



FINAL ENVIRONMENTAL IMPACT REPORT – Volume 2

SFPUC Southern Skyline Boulevard Ridge Trail Extension Project

PLANNING DEPARTMENT
CASE NO. 2016-016100ENV

STATE CLEARINGHOUSE NO. 1998082030

Draft EIR Publication Date:	June 24, 2020
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Draft EIR Public Comment Period:	June 25, 2020 to August 10, 2020
Final EIR Certification Hearing Date	April 29, 2021



SAN FRANCISCO
PLANNING
DEPARTMENT

SFPUC Southern Skyline Boulevard Ridge Trail Extension Project

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City and County of San Francisco
San Francisco Planning Department

A dot (●) indicates material that has been revised since publication of the Draft EIR. A dot with an asterisk (●*) is used in the Table of Contents to identify which sections of the document contain changes.

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CHAPTER 8

INTRODUCTION TO RESPONSES TO COMMENTS

8.1 Purpose of the Responses to Comments Document

The purpose of this responses to comments (RTC) document is to present comments on the draft environmental impact report (draft EIR) for the proposed San Francisco Public Utilities Commission (SFPUC) Southern Skyline Boulevard Ridge Trail Extension Project (project), to respond in writing to comments on environmental issues, and to revise the draft EIR as necessary to provide additional clarity. Comments were made in written form during the public comment period from June 25, 2020 to August 10, 2020, and as oral testimony received before the San Francisco Planning Commission at the public hearing on the draft EIR held on July 23, 2020. A complete transcript of proceedings from the public hearing on the draft EIR and all written comments are included herein in their entirety. A complete list of commenters is provided in Chapter 10, List of Persons Commenting.

Pursuant to the California Environmental Quality Act¹ (CEQA) Public Resources Code sections 21091(d)(2)(A) and (B), the San Francisco Planning Department (planning department) has considered the comments received on the draft EIR, evaluated the issues raised, and provides written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the evaluation of all public comments received on the draft EIR and the identification of comments that raise significant environmental issues requiring a good faith, reasoned analysis in the written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in response may correspond to the level of detail provided in the comment. Where appropriate, this RTC document also includes EIR text changes made in response to comments.

In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project. The project has not substantively changed since publication of the draft EIR such that additional environmental analysis is warranted. Where relevant to topics raised in public comments, the responses provide additional clarifying project description information. These clarifications do not affect the EIR's analysis or conclusions.

“Significant effects on the environment” means substantial, or potentially substantial, adverse changes in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered a significant effect on the environment.² Therefore, this document focuses primarily on responding to comments that relate to physical environmental issues, in compliance with CEQA.³ However, for informational purposes, this RTC document also provides limited responses to general comments on the draft EIR received during the public review period that are not related to physical environmental issues.

The comments do not identify any new significant environmental impacts, or substantial increases in the severity of previously identified environmental impacts, from those analyzed in the draft EIR. Nor do the

¹ Public Resources Code sections 21000–21189 (the California Environmental Quality Act, or CEQA).

² CEQA Guidelines section 15064(e).

³ CEQA Guidelines sections 15382, 15064(c), and 15064(d).

comments identify feasible project alternatives or mitigation measures that are considerably different from those analyzed in the draft EIR that would clearly lessen the significant environmental impacts of the proposed project or project variant, but which the project sponsor has not agreed to study or implement.

The planning department is the Lead Agency under CEQA responsible for administering the environmental review of projects within the City and County of San Francisco. The draft EIR together with this RTC document constitutes the final EIR for the project in fulfillment of CEQA requirements consistent with CEQA Guidelines section 15132. The final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines and the San Francisco Administrative Code, chapter 31. It is an informational document for use by (1) governmental agencies (such as the City and County of San Francisco) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) the planning commission and other City and County of San Francisco (city) entities (such as SFPUC and the Board of Supervisors) where applicable prior to their decision to approve, disapprove, or modify the project. If the city approves the proposed project, CEQA requires it adopt CEQA findings and a mitigation monitoring and reporting program (MMRP or mitigation program) to ensure that mitigation measures identified in the final EIR are implemented.

8.2 Environmental Review Process

CEQA Guidelines sections 15080 to 15097 set forth the EIR process, which includes multiple phases involving notification and input from responsible agencies and the public. The main steps in this process are described below.

8.2.1 Notice of Preparation and Public Scoping

On December 21, 2016, the planning department published and distributed to governmental agencies, organizations, and known interested persons a Notice of Preparation (NOP) of an EIR for the project. In addition, on March 30, 2017 the planning department expanded its public outreach by mailing the NOP to owners and occupants of properties within 300 feet of project sites. Distribution of the NOP initiated the official scoping process, which allows the public and government agencies to comment on the scope and content of the EIR. The public scoping process included two 30-day public scoping periods—from December 21, 2016 to February 3, 2017 and from March 30, 2017 to April 29, 2017, respectively. The planning department held a public scoping meeting on Wednesday, January 18, 2017 at the SFPUC, 525 Golden Gate Avenue, San Francisco, California to receive oral comments on the scope of the EIR. During the scoping periods, interested parties provided a total of 56 comments, including letters, emails, and oral comments. The correspondence received in response to the NOP, both written and oral comments,⁴ are included in EIR Appendix A. The planning department has considered all comments made by the public and agencies during the scoping period in preparing the project EIR.

8.2.2 Draft EIR Public Review

The planning department published the draft EIR on June 24, 2020 and circulated it to local, state, and federal agencies and to interested organizations and individuals for their review and comment. On June 25, 2020, the planning department also distributed notices of availability (NOA) of the draft EIR to more than 420 interested

⁴ A transcript of the oral comments received at the January 18, 2017 public scoping meeting is included in Draft EIR, Appendix A.

parties, published notification of its availability in a newspaper of general circulation in the Bay Area (the San Francisco Examiner), and posted four notices at the project site. The NOA complied with local requirements under the March 23, 2020 Fifth Supplement to the Mayoral Proclamation Declaring the Existence of a Local Emergency Dated February 25, 2020. Electronic copies of the draft EIR and record of proceedings were made available and can be accessed through the internet on the planning department's website at <http://sf-planning.org/sfpuc-negative-declarations-eirs>.

The public review period for the draft EIR started on June 25, 2020 and ended on August 10, 2020. During the public review period, the planning department conducted a public hearing to receive oral comments on the draft EIR. The public hearing was held virtually/electronically before the San Francisco Planning Commission on July 23, 2020. A transcript of the public hearing is included as Appendix G of this RTC document. During the draft EIR public review period, the planning department received written and oral comments from four public agencies, 10 organizations, and 384 private individuals. See Chapter 10, List of Persons Commenting, for a complete list of persons, agencies, and organizations commenting on the draft EIR.

8.2.3 Responses to Comments Document and Final EIR

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft EIR. Under CEQA Guidelines section 15201,⁵ members of the public may comment on the project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be “on the sufficiency of the [draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” In addition, “when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” CEQA Guidelines section 15088 specifies that the lead agency is required to respond to the comments on the major environmental issues raised in the comments received during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft EIR in disclosing the significance of the environmental impacts of the project that was evaluated in the draft EIR.

The planning department distributed this RTC document for review to the San Francisco Planning Commission, as well as to the other public agencies and commissions, organizations, and individuals who commented on the draft EIR. In accordance with CEQA section 21092.5, the planning department has distributed the document 10 days prior to the planning commission hearing at which EIR certification will be considered. The planning commission will consider the adequacy of the final EIR—consisting of the draft EIR and the RTC document—in complying with the requirements of CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. If the planning commission finds that the final EIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the final EIR under CEQA.

If the final EIR is certified, the SFPUC will then review and consider the final EIR before making a decision to approve the proposed project. If the SFPUC decides to approve the project, it will adopt CEQA findings, including adopting or rejecting mitigation measures and alternatives to avoid or reduce significant impacts, and a mitigation monitoring and reporting program (MMRP). Consistent with CEQA Guidelines section 15097,⁶ the MMRP is designed to ensure implementation of the mitigation measures identified in the final EIR and

⁵ CEQA section 21082.1(b).

⁶ CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.

adopted by decision-makers to mitigate or avoid the project's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092). If the EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels and the project is approved, the findings must reject project alternatives and include a statement of overriding considerations for those impacts (CEQA Guidelines section 15093(b)). The SFPUC would adopt the MMRP as a condition of project approval.

8.3 Document Organization

This RTC document is organized to complement the draft EIR, and the order of the response topics generally follows that of the draft EIR's topical sections. The draft EIR consists of Chapters S through 7 and Appendices A through E as follows:

- **Chapter S, Summary.** This chapter summarizes the project, identifies significant environmental impacts and mitigation measures, and describes the alternatives considered in the EIR, including the environmentally superior alternative. It also identifies areas of controversy and issues to be resolved.
- **Chapter 1, Introduction.** This chapter describes the purpose and organization of the EIR, as well as the environmental review process and additional public outreach efforts.
- **Chapter 2, Project Description.** This chapter describes the project (including project background and project objectives), summarizes project components, and provides information about project construction and operation. The chapter also lists permits and approvals relevant to the construction and operation of the project.
- **Chapter 3, Plans and Policies.** This chapter describes applicable land use plans and policies and their relevance to the project and identifies any inconsistencies with those plans.
- **Chapter 4, Environmental Setting and Impacts.** This chapter covers a comprehensive range of environmental resource topics. Topics for which the project could result in a significant adverse impact or are otherwise of substantial public interest are addressed in individual sections corresponding to the respective environmental topic. Each such section describes the existing and/or baseline conditions relative to that resource; applicable regulatory framework; significance criteria used to assess the severity of the impacts; approach to and methodologies used in the impact analysis; and individually numbered impact statements and associated discussion of project-specific and cumulative impacts of the project and a determination of the significance of each impact. For impacts determined to be significant, mitigation measures that would reduce or avoid those impacts are presented. This chapter also addresses, albeit at a lesser level of detail, topics for which detailed impact analysis is not warranted because initial review for the EIR found that the project would not cause significant effects related to those resource topics.
- **Chapter 5, Other CEQA Issues.** This chapter discusses growth-inducing effects, identifies the significant environmental effects that cannot be avoided if the project is implemented, and describes significant irreversible impacts.
- **Chapter 6, Alternatives.** This chapter describes the alternatives to the project and compares their impacts to those of the project. This chapter also summarizes the alternatives that were considered but eliminated from further analysis.
- **Chapter 7, Report Preparers.** This chapter lists the authors of the EIR.

Technical and other supporting information are included in draft EIR appendices A through E.

This RTC document consists of Chapters 8 through 12 plus supplemental appendices, as follows:

- **Chapter 8, Introduction to Responses to Comments.** This chapter describes the purpose of the RTC document, the environmental review process, and the organization of the entire EIR.
- **Chapter 9, Revisions and Clarifications to the Proposed Project.** This chapter summarizes changes to the description of the proposed project, as described in draft EIR Chapter 2, that the SFPUC has initiated since publication of the draft EIR. The revisions and clarifications consist of minor updates to the project description and the associated environmental analysis previously presented in the draft EIR. RTC Chapter 9 analyzes and concludes that these revisions and clarifications to the proposed project would not result in any new environmental impacts not already discussed in the draft EIR or a substantial increase in the severity of previously identified significant environmental impacts.
- **Chapter 10, List of Persons Commenting.** This chapter lists the public agencies, organizations, and individual persons who submitted written comments during the public review period or spoke at the public hearing for the draft EIR. The tables identify whether the persons submitted comments in writing (i.e., via letter) during the public comment period, or orally at the draft EIR public hearing. Commenters within each category are listed in alphabetical order. These lists also show the comment code (described below) and the format (i.e., public hearing transcript, letter, or email) and the date of each set of comments.
- **Chapter 11, Responses to Comments.** This chapter presents the substantive comments excerpted verbatim from the public hearing transcript and comment letters. The complete transcript, letters, and emails containing the comments are provided in Appendices F and G of this RTC document. The comments and responses in this chapter are organized by topic and, where appropriate, by subtopic, in the same order as the environmental topics addressed in draft EIR Chapter 4. Similar comments on the same topic were received from multiple commenters. These comments are grouped together, and a single comprehensive response is provided.
- **Chapter 12, Draft EIR Revisions.** This chapter presents changes and additions to the draft EIR. The planning department has made changes and revisions to the draft EIR either in response to comments received on the draft EIR, to include updated information, or as necessary to clarify statements and conclusions made in the draft EIR. In all cases, changes are provided to clarify or correct content in the draft EIR or to add information received after the release of the draft EIR. None of the changes or additions in Chapter 12 substantially affect the conclusions presented in the draft EIR.
- **Responses to Comments Appendices.** The appendices include full copies of the written comments received on the draft EIR (Appendix F, Written Comments on the Draft EIR) and the transcript of the public hearing held for the Draft EIR (Appendix G, Draft EIR Hearing Transcript). Appendices F and G also show, in the margin of each letter or transcript, the bracketing and comment code used to identify comments and the corresponding response code.

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CHAPTER 9

REVISIONS AND CLARIFICATIONS TO THE PROJECT DESCRIPTION

Since publication of the draft EIR, the SFPUC has initiated minor revisions to the project as described in draft EIR Chapter 2, Project Description. This chapter summarizes these revisions, describes updates to the text in the draft EIR (deletions are shown in ~~strike through~~; new text is double-underlined), and describes the environmental impacts of the revisions. Draft EIR text revisions are presented in this chapter only where they have been made specifically in EIR Chapter 2, Project Description. Text revisions in other portions of the EIR that are updated as a result of these changes are presented in RTC Chapter 12, Draft EIR Revisions.

The revisions update the information in the draft EIR. The changes do not provide new information that would result in any new significant impacts that were not already identified in the draft EIR, nor would they increase the severity of any of the project's impacts identified in the draft EIR. Mitigation measures identified in the draft EIR would continue to be required in order to reduce or avoid significant environmental impacts. No new measures would be required to mitigate the significant impacts identified for the proposed project in the draft EIR.

CEQA Guidelines section 15088.5 requires recirculation of an EIR when “significant new information” is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines state that information is “significant” if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement.” Section 15088.5 further defines “significant new information” that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, of a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines section 15088.5(b) states that recirculation is not required if “new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As described below, the revisions and clarifications to the project would not introduce new elements or substantially modify previously proposed elements that would result in any new significant impacts not already identified for the project studied in the draft EIR, nor would these changes increase the severity of any identified significant impacts.

9.1 Summary of Project Description Revisions

The project description revisions are described below. Certain aspects of the project are superseded and replaced by the minor changes presented in this chapter; all other aspects of the project description remain unchanged, as presented in draft EIR Chapter 2, Project Description. The environmental effects of the project with the project refinements incorporated are fully covered by the analyses in this chapter together with the analyses in draft EIR Chapter 4, Environmental Setting and Impacts.

9.1.1 Wildlife Friendly Barbed-wire Fencing

The barbed-wire fencing described in the draft EIR's Chapter 2, Project Description, covers a range of potential sizes and configurations which include wildlife-friendly design elements. Since publication of the draft EIR, the SFPUC has refined the project description to include more specific information regarding the types and locations of proposed barbed wire fencing. The revised project description presents two design options for each of interior and exterior boundary fencing, each of which includes more specific wildlife friendly design details.

9.1.2 Additional Educational/Interpretive Signage

The draft EIR's project description states that under both the proposed access program and the variants the project would include an educational component. Specifically, the project description explains that educational programming would be based upon the Peninsula Watershed Trail Interpretive Master Plan and would provide interpretive educational information for recreational users, including SFPUC- and volunteer-hosted school program visits to the improved trail areas. The draft EIR's project description includes an educational/interpretive kiosk and directional signage near the universal access loop trail, along Fifield-Cahill ridge trail, near Cemetery Gate. Since publication of the draft EIR, the SFPUC has revised the project description to include additional educational/interpretive signage along the Fifield-Cahill ridge trail.

9.2 Draft EIR Revisions

The fencing description in Chapter 2, Project Description (p. 2-18), for the southern skyline ridge trail is revised as follows:

Security Features

To facilitate public access through the watershed while minimizing risks to public health and safety, the SFPUC would repair or install perimeter barbed-wire fencing along most of the southern skyline ridge trail alignment, with lockable gates at designated access points. The SFPUC has developed two categories of barbed-wire fencing, the specifications of which differ depending upon location and purpose. Each of the two categories – exterior boundary fencing and interior fencing – includes two designs (total of four designs), the details of which are presented below.

Exterior boundary fencing is proposed along property lines and roads where the SFPUC has identified security as a greater concern. The exterior boundary fencing would have two possible designs depending on location which would be either 48 or 60 inches tall; both types would have a smooth bottom wire at 12 inches above ground level and a barbed top wire. The spacing between wires would be 9 inches for both designs, except that the top two wires of the 60-inch design would be 12 inches apart.

Interior fencing is proposed between the trail and the watershed's interior, where access needs to be controlled, but security concerns are lower due to distance from the road and parking areas (which are more publicly accessible with higher traffic. The interior fencing would have two designs depending on location, either be between 42 or and 54 inches tall; both types would have a smooth bottom wire at 18 inches above ground surface, and a smooth top wire. The spacing between wires would be 6 inches for both designs, except that the top two wires of the 54-inch design would be 12 inches apart.

The SFPUC has designed the fencing with consideration for wildlife passage and required watershed security and resource protection, drawing upon relevant literature, local experience, and organizational

knowledge.^{15a} The shorter of the two designs in each category would be used in areas known to or suspected to be wildlife movement corridors. All fencing would have reflectors to increase visibility, prevent bird strike, and discourage wildlife from attempting passage through the middle of fence. Under all designs, the barbed-wire fencing would be strung between metal posts spaced approximately 10 feet apart.

This fencing would ~~mainly be 5-foot tall, barbed-wire fence extend~~ along approximately 5.5 miles of the southern skyline ridge trail's eastern frontage (interior) and 3.6 miles of the trail's western frontage (exterior). ~~The barbed-wire fencing would be strung between metal posts spaced approximately 10 feet apart. The SFPUC is considering a range of barbed-wire fencing types, with heights ranging from 42 to 60 inches, strands ranging from five to seven, and with un-barbed bottom wires ranging from 12 to 18 inches above the ground surface.~~ The SFPUC is not proposing new fencing where barbed-wire fencing already exists in the remaining portions of the western frontage. The project design calls for barbed-wire fencing setbacks of approximately 5 to 850 feet from the trail centerline, based upon topography, vegetation, property boundaries, and avoidance of sensitive resources.

In addition to the barbed-wire fencing, the SFPUC would install approximately 1,380 linear feet of 2.5-foot-tall barrier rail along the outer slope edge of trail segments with retaining walls. In addition, the SFPUC would construct a 4-foot-tall, 610-foot-long split-rail fence along the perimeter of the southern skyline ridge trail parking lot.

^{15a} Fournet, John, 2020, Email from John Fournet (SFPUC) to Scott MacPherson (SFPUC), Subject: Re: Ridge Trail EIR – Responses to Comments- wildlife friendly fencing, October 28, 2020.

The fencing description in Chapter 2, Project Description (p. 2-20), for the Fifield-Cahill ridge trail is revised as follows:

Security Features

The SFPUC would install road gates and *bollards*¹⁶ on Cahill Ridge Road (a service road) south of Cemetery Gate to limit vehicles to the access road and parking area only. In addition, under the unsupervised access management variants (variants 2 and 3, discussed further in Section 2.7.1, Trail Access Management Program and Visitation), the SFPUC would install barbed-wire fencing along the Fifield-Cahill ridge trail. This fencing would include approximately 8 miles of new fencing along both sides of the trail (16.3 miles in total) between Portola Gate and Cemetery Gate. The barbed-wire fencing components and dimensions would be as generally consistent with that described above for the southern skyline ridge trail's 54-inch interior fencing. The new fencing would be set back from the trail centerline by up to 50 feet, as topography and vegetation allow.

Section 2.5.1.2, *Fifield-Cahill Ridge Trail Improvements*, on draft EIR page 2-20, is revised to include a new subsection after the subsection Security Features, as follows:

Educational/Interpretive Signage

In addition to the trailhead signage identified for the universal access loop trail, above, the SFPUC would install 13 additional educational/interpretive signs along the Fifield-Cahill ridge trail. Consistent with the Peninsula Watershed Interpretive Master Plan, the signs would consist of interpretive panels which “moves beyond facts to tell a story that connects the visitor to the inherent meaning of a site’s

9. Revisions and Clarifications to the Project Description

9.3. Environmental Impacts

resources.”^{16a} The panels would measure approximately 36 inches horizontal by 24 inches vertical, would rise to a height of approximately 48 inches above the ground surface, and would be positioned at a 30 to 45 degree angle for maximum viewing and minimal view blockage. Each sign, which would be located along the existing service road (Fifield-Cahill ridge trail) shoulder, would be mounted on two redwood or metal posts set in concrete. The SFPUC would use a power auger or hand operated post hole digger to excavate the signpost holes, each of which would measure approximately 6 inches diameter and 36 inches deep. Sign installation would involve approximately 2.5 square yards of ground disturbance total. The educational/interpretive signage would be installed under both the proposed access program and the variants.

^{16a} SFPUC, 2019, *Peninsula Watershed Trails Interpretive Master Plan*, October 2019.

9.3 Environmental Impacts

The minor modifications described in RTC Section 9.2, Draft EIR Revisions, above would not result in any changes to the trail alignment, construction approach, or operations assumptions. Nor would these modifications result in any changes to the assumptions, analysis, or conclusions described in the draft EIR’s assessment of the proposed project’s potential environmental effects as presented in draft EIR Chapter 4, Environmental Setting and Impacts, with respect to any resource topics.

The barbed-wire fencing described in Section 9.2 would not be substantially different from that evaluated in the draft EIR. Notable changes include the height and spacing of the wires. However, the length, location, composition, and footprint of the fencing would remain as described and evaluated in the draft EIR.

The signage identified in Section 9.2 would be located in an area of low sensitivity for cultural resources, removed from any waterways and hazardous materials sites, and distant from noise sensitive land uses. The minimal ground disturbance required would not cause or contribute to geologic or seismic hazards. Given the short duration and small equipment required for installation, this work would result in a negligible increase in construction emissions of air quality pollutants and greenhouse gas emissions. The signage would be small in size and scale relative to other developments in the watershed, spaced at approximately 0.65 miles on average (about 1 every 3,450 feet), and would be subordinate to the aesthetic resources that contribute to the watershed’s high scenic quality (i.e., topography, vegetation, and vistas). And the new signage would not require substantial vegetation clearing such that special status plants or animals would be adversely impacted. Regardless, the SFPUC would observe the established protocols identified in draft EIR Chapter 2, as applicable, to minimize potential effects on nesting birds, special status plants, and the spread of plant pathogens within the watershed.

For the reasons presented, the revisions to the proposed project would not result in any new significant impacts that were not already identified in the draft EIR, nor would these changes substantially increase the severity of any impacts identified in the draft EIR. The mitigation measures identified in the draft EIR for the proposed project would continue to be required to reduce or avoid the significant environmental impacts of the revised proposed project. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the draft EIR. Therefore, references to the proposed project in this RTC document, including Chapter 12, Draft EIR Revisions, shall be interpreted to include and incorporate any changes proposed by the revised proposed project, unless otherwise noted.

CHAPTER 10

LIST OF PERSONS COMMENTING

This chapter lists all persons who submitted comments on the draft EIR. Commenters are grouped according to whether they commented as individuals or represent a public agency or non-governmental organization. **Table 10-1**, lists commenters' names, along with the corresponding commenter codes used in Chapter 11, Comments and Responses, to denote each set of comments, the comment format, and the comment date. The complete set of written and oral comments received on the draft EIR is contained in Appendix F, Written Comments on the Draft EIR, and Appendix G, Draft EIR Hearing Transcript.

In this RTC document, each commenter who submitted written correspondence or provided oral comment during the San Francisco Planning Commission hearing is assigned a unique commenter code in the following manner:

- Commenters from agencies are designated by "A-" and the agency's name or acronym thereof.
- Commenters from organizations are designated by "O-" and the organization's name or acronym thereof.
- Commenters as individuals are designated by "I-" and the commenter's last name.

If a commenter provided more than one set of comments, the acronym or name is followed by a hyphen and number indicating the comment set (e.g., -1, -2, -3). Within each category (public agencies, organizations, and individuals), commenters are listed in alphabetical order by code.

Similarly, each individual comment is assigned a unique comment code. Within each comment letter or public hearing testimony, individual comments on separate topics are bracketed and numbered sequentially; these numbers follow the commenter code described above, separated by a period. For example, the first comment from the letter submitted by the California Department of Transportation is designated as A-Caltrans.1, the second comment as A-Caltrans.2, and so on.

In this way, the reader can locate a particular comment in a comment letter or the public hearing testimony by referring to the comment's coded designation. Appendices F and G include the bracketing and coding of all substantive comments. These comment codes are used in Chapter 11 to identify which responses apply to which comment.

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
AGENCIES			
A-CALFIRE	Richard Sampson, Forester II-Unit Forester, Department of Forestry and Fire Protection	Letter via E-mail	July 17, 2020
A-Caltrans	Mark Leong, District Branch Chief, Department of Transportation, District 4	Letter via E-mail	July 30, 2020
A-CDFW	Gregg Erickson, Regional Manager, Department of Fish and Wildlife	Letter via E-mail	August 6, 2020
A-CPC-Chan	Deland Chan, Commissioner, San Francisco Planning Commission	Planning Commission Hearing Transcript	July 23, 2020
A-CPC-Diamond	Sue Diamond, Commissioner, San Francisco Planning Commission	Planning Commission Hearing Transcript	July 23, 2020
A-CPC-Imperial	Theresa Imperial, Commissioner, San Francisco Planning Commission	Planning Commission Hearing Transcript	July 23, 2020
NON-GOVERNMENTAL ORGANIZATIONS			
O-BARTC-1	Janet McBride, Executive Director, Bay Area Ridge Trail Council	Letter via E-mail	August 6, 2020
O-BARTC-2	Liz Westbrook, Bay Area Ridge Trail Council	Planning Commission Hearing Transcript	July 23, 2020
O-Midpeninsula Regional Open Space District	Ana Ruiz, General Manager, Midpeninsula Regional Open Space District	Letter via E-mail	August 10, 2020
O-CNPS	Jake Sigg, Conservation Committee Chair, California Native Plant Society	E-mail	August 10, 2020
O-GGAudubon	Whitney Grover, SF Conservation Committee Chair, Golden Gate Audubon Society	E-mail	August 10, 2020
O-GreenFoothills	Lennie Roberts, Legislative Advocate, Green Foothills	Letter via E-mail	August 10, 2020
O-POST	Walter Moore, President, Peninsula Open Space Trust	Letter via E-mail	August 10, 2020
O-Sequoia Audubon	Marshall Dinowitz, Conservation Committee Chair, Sequoia Audubon Society; Leslie Flint, Conservation Committee Member, Sequoia Audubon Society	Letter via E-mail	August 7, 2020
O-SFUR	Matthew Blain, SF Urban Riders	Planning Commission Hearing Transcript	July 23, 2020
O-Sierra Club	Mike Ferreira, Loma Prieta Chapter Executive Committee, Sierra Club; Arthur Feinstein, San Francisco Bay Chapter Executive Committee, Sierra Club	Letter via E-mail	August 10, 2020
O-SVMB	Sean McKenna, Silicon Valley Mountain Bikers	Letter via E-mail	August 10, 2020

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Commenter Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS			
I-Abbas	Alex Abbas	E-mail	July 24, 2020
I-Ackerman	Dylan Ackerman	E-mail	June 30, 2020
I-Adams	Jan Adams	E-mail	August 6, 2020
I-Alcorn	Susan Alcorn	E-mail	August 4, 2020
I-Allanson	Karen Allanson	E-Mail	August 10, 2020
I-Alldredge	Piper Alldredge	E-mail	August 7, 2020
I-Allemand	Sofia Allemand	E-mail	August 7, 2020
I-Allen	Scott Allen	E-mail	August 10, 2020
I-Anagnoson	Rob Anagnoson	E-mail	August 9, 2020
I-Applewhite	Anthony Applewhite	E-mail	August 6, 2020
I-Arbizu	Margarita Arbizu	E-mail	August 5, 2020
I-Arena	Chris Arena	E-mail	August 9, 2020
I-Arias	Javier Arias	E-mail	July 5, 2020
I-Armer	Joan Armer	E-mail	August 6, 2020
I-Arnold	Tom Arnold	E-mail	August 5, 2020
I-Arnold_J	Joan Arnold	E-mail	August 6, 2020
I-Ashley	Kate Ashley	E-mail	August 6, 2020
I-Axelrod	David Axelrod	E-mail	August 7, 2020
I-Bain	Candace Bain	E-mail	June 28, 2020
I-Baldwin	Donald Baldwin	E-mail	August 6, 2020
I-Barile	Jeff Barile	E-mail	July 13, 2020
I-Bartholomew	Brendan Bartholomew	E-mail	July 20, 2020
I-Barton	Terry Barton	E-mail	August 10, 2020
I-Basin	Cheryl Basin	E-mail	August 6, 2020
I-Beardsley	Aaron Beardsley	E-mail	July 4, 2020
I-Benesis	Marc Benesis	E-mail	July 10, 2020
I-Benioff	Jeanne Benioff	E-mail	August 6, 2020
I-Bergman	Claudette Bergman	E-mail	August 6, 2020
I-Bernstein	Maxwell Bernstein	E-mail	August 10, 2020
I-Bigbee	Paul Bigbee	E-mail	August 6, 2020
I-Black	Carlin Black	E-mail	August 4, 2020
I-Block	George Block	E-mail	July 16, 2020
I-Blockstein	Sue Blockstein	E-mail	August 2, 2020
I-Bobier	Kristine Bobier	E-mail	August 7, 2020
I-Boltin	Iain Boltin	E-mail	August 4, 2020
I-Borac	Cleo Borac	E-mail	July 7, 2020
I-Borden	Tom Borden	E-mail	July 23, 2020
I-Borelli	Beverley Siri Borelli	E-mail	August 4, 2020
I-Brady	William Brady	E-mail	August 7, 2020
I-Bridgeman-1	Carole Bridgeman	E-mail	August 9, 2020
I-Bridgeman-2	Carole Bridgeman	E-mail	August 9, 2020

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Brinckloe	Julie Brinckloe	E-mail	August 6, 2020
I-Brousseau-1	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-10	Christopher Brousseau	E-mail	July 12, 2020
I-Brousseau-2	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-3	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-4	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-5	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-6	Christopher Brousseau	E-mail	August 9, 2020
I-Brousseau-7	Christopher Brousseau	E-mail	August 10, 2020
I-Brousseau-8	Christopher Brousseau	E-mail	August 4, 2020
I-Brousseau-9	Christopher Brousseau	E-mail	August 9, 2020
I-Brown	Phyllis Rugg Brown	E-mail	August 5, 2020
I-Brubaker	Wesley Brubaker	E-mail	August 4, 2020
I-Bryan	Susan Bryan	E-mail	August 7, 2020
I-Buch	Vineet Buch	E-mail	August 9, 2020
I-Buncic	Mike Buncic	E-mail	August 9, 2020
I-Burger	Ursula Burger	E-mail	August 6, 2020
I-Burrows	Matthew Burrows	E-mail	August 10, 2020
I-Bushue	Mike Bushue	E-mail	August 7, 2020
I-Buxton	Mary Buxton	E-mail	August 9, 2020
I-Camerlengo	Judy Camerlengo	E-mail	August 5, 2020
I-Cancell	June Cancell	E-mail	August 6, 2020
I-Carroll	Jessica Carrol	E-mail	August 9, 2020
I-Carter-1	Jonathan Carter	E-mail	June 27, 2020
I-Carter-2	Jonathan Carter	E-mail	August 4, 2020
I-Case	Sarah Case	E-mail	August 6, 2020
I-Cassel	Edith Cassel	E-mail	August 6, 2020
I-Chaney	Carolyn Chaney	E-mail	July 20, 2020
I-Chang	Chang	E-mail	August 8, 2020
I-Chase	Laurie Chase	E-mail	August 5, 2020
I-Chavez	Teri Chavez	E-mail	July 6, 2020
I-Chen	Mich Chen	E-mail	August 4, 2020
I-Chris-1	Chris	E-mail	July 18, 2020
I-Chris-2	Chris	E-mail	July 25, 2020
I-Clark_D	David Clark	E-mail	July 11, 2020
I-Clark_M	Matthew Clark	E-mail	August 7, 2020
I-Clarke	James Clarke	E-mail	August 6, 2020
I-Clutton	Chris Clutton	E-mail	August 8, 2020
I-Cooper	Cameron Cooper	E-mail	August 6, 2020
I-Cordes	John Cordes	E-mail	July 21, 2020
I-Corley	Kristi Corley	E-mail	August 6, 2020

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Commenter Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Cousineau	Austin Cousineau	E-mail	July 6, 2020
I-Coyne	Brian Coyne	E-mail	August 10, 2020
I-Crater	Bonnie Crater	E-mail	August 4, 2020
I-Crow	Carolyn Crow	E-mail	August 6, 2020
I-Cuff	Kermit Cuff	E-mail	July 23, 2020
I-Culligan	Burke Culligan	E-mail	June 30, 2020
I-Curd	John Curd	E-mail	August 8, 2020
I-Cuviello	Pat Cuveillo	E-mail	August 8, 2020
I-Dat	Ted Dat	E-mail	August 7, 2020
I-Davidson	Andrew Davidson	E-mail	August 5, 2020
I-Davis	Janet Davis	E-mail	August 6, 2020
I-de la Rosa	Anne de la Rosa	E-mail	August 9, 2020
I-DeAngelis	Matt DeAngelis	E-mail	July 12, 2020
I-Dell	Stephen Dell	E-mail	August 5, 2020
I-Deutscher	Kathy Deutscher	E-mail	August 5, 2020
I-Dev	Gita Dev	E-mail	July 11, 2020
I-Dickstein	Leah Dickstein	E-mail	August 10, 2020
I-DiMattia	John DiMattia	E-mail	August 8, 2020
I-Dods	Suzie Dods	E-mail	August 10, 2020
I-Drazic	Stephanie Drazic	E-mail	August 7, 2020
I-Drees	Natalie Drees	E-mail	August 6, 2020
I-Drouin	Lisane Drouin	E-mail	August 6, 2020
I-Dsouza	Gladwyn Dsouza	E-mail	August 6, 2020
I-Eberhardt	Doug Eberhardt and Lisa Manning	E-mail	July 26, 2020
I-Eberle	Stefan Eberle	E-mail	August 7, 2020
I-Eckelmeyer	Karin Eckelmeyer	E-mail	August 6, 2020
I-Eichel	Kelsie Eichel	E-mail	August 4, 2020
I-Eisen	Adam Eisen	E-mail	August 7, 2020
I-Elliott	Janet Elliott	E-mail	August 6, 2020
I-Ellison	Sally Ellison	E-mail	August 6, 2020
I-Emanuel	Alex Emanuel	E-mail	August 6, 2020
I-Enevoldsen	Claus Enevoldsen	E-mail	August 4, 2020
I-Enns	Steven Enns	E-mail	August 5, 2020
I-Esteban	Gregory Esteban	E-mail	August 5, 2020
I-Evans	Bart Evans	E-mail	August 8, 2020
I-Evanston	Luci Evanston	E-mail	August 7, 2020
I-Eve	Eve	E-mail	August 10, 2020
I-Enevoldsen	Claus Enevoldsen	E-mail	August 4, 2020
I-Fuad	Michael Fuad	E-mail	August 8, 2020
I-Fell	Ryan Fell	E-mail	August 8, 2020
I-Fenichel	Rachel Fenichel	E-mail	August 10, 2020

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Ferrari	Ellie Ferrari	E-mail	August 8, 2020
I-Ferreira	Michael J. Ferreira	E-mail	August 6, 2020
I-Fletcher	Alma Fletcher	E-mail	August 9, 2020
I-Fong	Norman Fong	E-mail	August 9, 2020
I-Forrister	Ann Forrister	E-mail	August 6, 2020
I-Forter	John David Forter	E-mail	August 4, 2020
I-Fox	Jamie Fox	E-mail	August 10, 2020
I-Fredrikson	Eileen Fredrikson	E-mail	August 10, 2020
I-Fritze	Christian Fritze	E-mail	August 10, 2020
I-Frost	Shelley Frost	E-mail	August 8, 2020
I-Fuad	Michael Fuad	E-mail	August 8, 2020
I-Garcia	Carlos Garcia	E-mail	August 6, 2020
I-Gedgafov_D	Daniil Gedgafov	E-mail	July 10, 2020
I-Gedgafov_T	Tamara Gedgafov	E-mail	July 10, 2020
I-Gedgafov_V-1	Vladimir Gedgafov	E-mail	June 26, 2020
I-Gedgafov_V-2	Vladimir Gedgafov	E-mail	July 4, 2020
I-German	Carrie and Tim German	E-mail	July 23, 2020
I-Gersh	Barbara Gersh	E-mail	July 15, 2020
I-Gibbons	Eileen Gibbons	E-mail	July 23, 2020
I-Gila	Barak Gila	E-mail	August 10, 2020
I-Gilmore	Meg Gilmore	E-mail	July 23, 2020
I-Gipp	Nicole Gipp	E-mail	August 9, 2020
I-Giusti	William Giusti	E-mail	August 6, 2020
I-Goldenberg	Benjamin Goldenberg	E-mail	August 7, 2020
I-Goldstein	Chip Goldstein	E-mail	August 7, 2020
I-Golembiewski	Mark Golembiewski	E-mail	August 4, 2020
I-Golshan	Nathan Golshan	E-mail	August 10, 2020
I-Gonzales	Robert Gonzales	E-mail	August 4, 2020
I-Goodrum	James Goodrum	E-mail	August 7, 2020
I-Gosling	Marcus Gosling	E-mail	August 5, 2020
I-Greene	Thomas Greene	E-mail	August 6, 2020
I-Guerra-1	David R Guerra	E-mail	June 27, 2020
I-Guerra-2	David Guerra	E-mail	July 23, 2020
I-Hagberg	Sharon Hagberg	E-mail	June 27, 2020
I-Hall_A	Andrew Hall	E-mail	July 16, 2020
I-Hall_B	Brad Hall	E-mail	August 5, 2020
I-Hall_R	Robert Hall	E-mail	July 13, 2020
I-HallSnyder	Nathan Hall-Snyder	E-mail	August 10, 2020
I-Harvey	Sean Harvey	E-mail	August 4, 2020
I-Haxton	Tom Haxton	E-mail	June 25, 2020
I-Haydon	Noah Haydon	E-mail	August 6, 2020

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Haye	David Haye	E-mail	August 10, 2020
I-Heiman	Ross Heiman	E-mail	July 2, 2020
I-Heitkamp	Ross S. Heitkamp	E-mail	August 8, 2020
I-Hettenbach	Gerri Hettenbach	E-mail	August 10, 2020
I-Hettrich	Renate Hettrich	E-mail	August 10, 2020
I-Heyden	Neil Heyden	E-mail	August 4, 2020
I-Hiestand	Susan Hiestand	E-mail	August 7, 2020
I-Hoffman	Dan Hoffman	E-mail	August 4, 2020
I-Hofland	Freda Hofland	E-mail	July 12, 2020
I-Homan	William Homan	E-mail	August 6, 2020
I-Howitson	Mark Howitson	E-mail	June 30, 2020
I-Howse	Andy Howse	E-mail	July 1, 2020
I-Huang	Kathy Huang	E-mail	August 5, 2020
I-Hutchinson	Jeff Hutchinson	E-mail	July 5, 2020
I-Hyer	Jeanette Hyer and Arturo Alvarez	E-mail	August 11, 2020
I-Ingram	Peter Ingram	E-mail	August 10, 2020
I-Jacobs	Tori Jacobs	E-mail	July 6, 2020
I-Jankowski	Jesse Jankowski	E-mail	August 7, 2020
I-Janson	Nils Janson	E-mail	August 8, 2020
I-Jen	Bobby Jen	E-mail	July 2, 2020
I-Johansen-1	Fred Johansen	E-mail	June 27, 2020
I-Johansen-2	Fred Johansen	E-mail	August 9, 2020
I-Johnson_J	Jonathan Johnson	E-mail	July 27, 2020
I-Johnson_M	Mike Johnson	E-mail	August 9, 2020
I-Kawaja	Jon Kawaja	E-mail	July 3, 2020
I-Kaye	Theodore J. Kaye	E-mail	August 6, 2020
I-Kenin-1	Alexandra Kenin	E-mail	August 8, 2020
I-Kenin-2	Alexandra Kenin	E-mail	July 6, 2020
I-Kesterson	Ian Kesterson	E-mail	August 5, 2020
I-Key	Charles Key	E-mail	August 6, 2020
I-King_K	Kenneth King	E-mail	August 7, 2020
I-King_S	Steven King	E-mail	August 6, 2020
I-Kirschling	Karen Kirschling	E-mail	July 13, 2020
I-Kitto	Patrick Kitto	E-mail	August 5, 2020
I-Klein	Joel Klein	E-mail	August 9, 2020
I-Korbholz_K	Kathy Korbholz	E-mail	August 6, 2020
I-Korbholz_W	William Korbholz	E-mail	August 6, 2020
I-Krensky	Rob Krensky	E-mail	August 4, 2020
I-Kromat	Heidi Kromat	E-mail	July 22, 2020
I-Kropp	Mason Kropp	E-mail	August 4, 2020
I-Kunz	John Kunz	E-mail	August 4, 2020

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Langham	Kevin Langham	E-mail	August 6, 2020
I-Larsen_D	Denise and Don Larsen	E-mail	July 2, 2020
I-Larsen_S	Scot Larsen	E-mail	August 9, 2020
I-Le	David Le	E-mail	July 11, 2020
I-Lee	Lee	E-mail	July 11, 2020
I-Lee_D	Donovan Lee	E-mail	August 7, 2020
I-LeeRodgers	Alexander B Lee-Rodgers	E-mail	July 6, 2020
I-Lehane	Michael Lehane	E-mail	August 10, 2020
I-Leroy	Lieven Leroy	E-mail	August 9, 2020
I-Lesher	Ted Lesher	E-mail	August 9, 2020
I-Lider-1	Brett Lider	E-mail	July 6, 2020
I-Lider-2	Brett Lider	E-mail	August 7, 2020
I-Liebes_L	Linda Liebes	E-mail	August 7, 2020
I-Liebes_S	Sidney Liebes	E-mail	August 7, 2020
I-Long	Warren Long	E-mail	August 5, 2020
I-Lopez	Toni Lopez	E-mail	July 13, 2020
I-Louie	Denise Louie	E-mail	July 10, 2020
I-Louis	Tim Louis	E-mail	August 8, 2020
I-Lubin	Thalia Lubin	E-mail	August 6, 2020
I-Luiso	Mark Luiso	E-mail	August 9, 2020
I-Luke	David Luke	E-mail	August 5, 2020
I-Lunders	Ken Lunders	E-mail	July 23, 2020
I-Macartney	Robert Macartney	E-mail	August 9, 2020
I-MacDonald	Scott MacDonald	E-mail	August 9, 2020
I-MacKenzie	Michelle MacKenzie	E-mail	August 6, 2020
I-Mackey	Theral Mackey	E-mail	August 6, 2020
I-Manning	Jordan Manning	E-mail	August 7, 2020
I-Mar	Hendry Mar	E-mail	July 10, 2020
I-Marbury	Janet Marbury	E-mail	August 6, 2020
I-Martin_D	Deirdre Martin	E-mail	August 7, 2020
I-Martin_K	Kurt Martin	E-mail	August 10, 2020
I-Martin_N	Nancy Martin	E-mail	August 4, 2020
I-Masterson	Carol Masterson	E-mail	July 17, 2020
I-Matera	Matthew Matera	E-mail	August 10, 2020
I-McBride	Lori McBride	E-mail	August 6, 2020
I-McCarthy	Stacy McCarthy	Letter	August 10, 2020
I-McDowall	Kate McDowall	E-mail	July 28, 2020
I-McEntee	Shannon Rose McEntee	E-mail	July 11, 2020
I-McGee	Todd McGee	E-mail	June 25, 2020
I-McKitterick	Nate McKitterick	E-mail	June 29, 2020
I-McKnight	Robin McKnight	E-mail	August 9, 2020

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Melin	Dan Melin	E-mail	August 8, 2020
I-Menshikov	Sergey Menshikov and Larisa Osipovich	E-mail	June 29, 2020
I-Mercado	Abel Mercado	E-mail	August 9, 2020
I-Mercay	Julien Mercay	E-mail	August 7, 2020
I-Mercer	Kristin Mercer	E-mail	July 12, 2020
I-Merrill	Thea and Steve Merrill	E-mail	July 11, 2020
I-Michaels	David Michaels	E-mail	July 6, 2020
I-Mitchell	Marc Mitchell	E-mail	August 6, 2020
I-Molitor-1	Jerry Molitor	E-mail	August 10, 2020
I-Molitor-2	Jerry Molitor	E-mail	June 25, 2020
I-Molitor-3	Jerry Molitor	Planning Commission Hearing Transcript	July 23, 2020
I-Mone	Carol Mone	E-mail	July 11, 2020
I-Moore_D	David Moore	E-mail	August 6, 2020
I-Moore_R	Rhoda Moore	E-mail	August 6, 2020
I-Morey	Gail Morey	E-mail	August 8, 2020
I-Morris	Emily Morris	E-mail	July 12, 2020
I-Morse	Joe Morse	E-mail	August 5, 2020
I-Mui	Andrew Mui	E-mail	August 4, 2020
I-Nachury	Maxence Nachury	E-mail	August 4, 2020
I-Naranjo-1	Michael Naranjo	E-mail	August 6, 2020
I-Naranjo-2	Michael Naranjo	Planning Commission Hearing Transcript	July 23, 2020
I-Neufeld	Jan Neufeld	E-mail	August 5, 2020
I-Newbold	Julie Newbold	E-mail	July 10, 2020
I-Newlands	Allan Newlands	E-mail	August 8, 2020
I-Nichols	Ryan Nichols	E-mail	July 1, 2020
I-Nielsen	Hans Nielsen	E-mail	August 5, 2020
I-Nye	Adelaide Nye	E-mail	August 6, 2020
I-Ober	Richard Ober	E-mail	July 4, 2020
I-Ocampo	Pamela Ocampo	E-mail	August 7, 2020
I-Oh	Jenny Oh	E-mail	August 7, 2020
I-Oldendorp	Jason Oldendorp	E-mail	June 26, 2020
I-Olson	Anna Olson	E-mail	August 9, 2020
I-Ozaki	Tsuyoshi Ozaki	E-mail	August 10, 2020
I-Paley	Daniel Paley	E-mail	August 4, 2020
I-Paton	Laura Paton	E-mail	August 3, 2020
I-Paulsen	David Paulsen	E-mail	August 4, 2020
I-Pearson	Enid Pearson	E-mail	July 28, 2020
I-Perez-Vargas	Sandra Perez-Vargas	E-mail	July 9, 2020
I-Perrone	David Perrone	E-mail	August 6, 2020

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Commenter Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Peyronel	Thibault Peyronel	E-mail	August 8, 2020
I-Philibosian	Belle Philibosian	E-mail	August 10, 2020
I-Pielenz	Christine Pielenz	E-mail	August 8, 2020
I-Pillow	Thomas Pillow	E-mail	July 1, 2020
I-Polacco	Ben Polacco	E-mail	August 10, 2020
I-Pollak	Ted Pollak	E-mail	June 28, 2020
I-Polley	Claudia Polley	E-mail	August 10, 2020
I-Potis	John Potis	E-mail	August 11, 2020
I-Purrington	Tracy Purrington	E-mail	July 28, 2020
I-Qian	Hansen Qian	E-mail	August 10, 2020
I-Quinn	Adda Quinn	E-mail	August 7, 2020
I-Rarback	Harvey Rarback	E-mail	August 6, 2020
I-Ratcliffe	Jim Ratcliffe	E-mail	June 27, 2020
I-Ray	Kathleen Ray	E-mail	August 7, 2020
I-Redalen	Aaron Redalen	E-mail	June 25, 2020
I-Reddig	Randy Reddig	E-mail	August 9, 2020
I-Reinhart	Pat Reinhart	E-mail	July 11, 2020
I-Rhodes	Karen Rhodes	E-mail	August 10, 2020
I-Ries	Paul Ries	E-mail	August 10, 2020
I-Rivera	Joe Rivera	E-mail	July 23, 2020
I-Rix	Betsy Rix	E-mail	July 22, 2020
I-Roberts-1	Rama Roberts	E-mail	August 5, 2020
I-Roberts-2	Rama Roberts	E-mail	July 5, 2020
I-Roesch	Anna Roesch	E-mail	August 9, 2020
I-Rogers	Brian Rogers	E-mail	August 5, 2020
I-Romano	Christina Romano and Bruce Pucket	E-mail	August 8, 2020
I-Rosekind	Stephanie Rosekind	E-mail	July 4, 2020
I-Rosenblatt	Bettina Rosenblatt	E-mail	August 8, 2020
I-Rosenblum	Stephen Rosenblum	E-mail	July 11, 2020
I-Rosenthal	Cindy Rosenthal	E-mail	August 4, 2020
I-Rosoff	John Rosoff	E-mail	August 9, 2020
I-Ruby_D	Dennis Ruby	E-mail	July 23, 2020
I-Ruby_J	Jan Ruby	E-mail	August 10, 2020
I-Ryan	Ted Ryan	E-mail	August 10, 2020
I-Scarborough	Robert Scarborough	E-mail	August 4, 2020
I-Schafer	Jeff Schafer	E-mail	June 26, 2020
I-Schaub	Jeremy Schaub	E-mail	August 14, 2020
I-Schlemmer	Patrick Schlemmer	E-mail	July 10, 2020
I-Schmidt	Lisa Schmidt	E-mail	July 14, 2020
I-Schroeder	Marc Schroeder	E-mail	July 4, 2020
I-Schryver	Thomas Schryver	E-mail	August 6, 2020

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Schwesig	Carsten Schwesig	E-mail	August 7, 2020
I-Scovill-1	William Scovill	E-mail	June 28, 2020
I-Scovill-2	Will Scovill	E-mail	July 24, 2020
I-Self	Matthew Self	E-mail	August 4, 2020
I-Shukis	Warren Shukis	E-mail	August 4, 2020
I-Shuler	Jay Shuler	E-mail	August 7, 2020
I-Shurtleff	Jeffrey Shurtleff	E-mail	August 8, 2020
I-Shute	Jeff Shute	E-mail	August 8, 2020
I-Simnett	Sarah Simnett	E-mail	August 10, 2020
I-Sinks	Gus Sinks	E-mail	July 23, 2020
I-Sivarajah_A	Arulampalam Sivarajah	E-mail	July 7, 2020
I-Sivarajah_M	Mythily Sivarajah	E-mail	August 9, 2020
I-Slezak	Doug Slezak	E-mail	August 6, 2020
I-Smetters	Diana Smetters	E-mail	August 10, 2020
I-Smith_A	Alan Smith	E-mail	August 5, 2020
I-Smith_O	Oscar Smith	E-mail	July 10, 2020
I-Smith_S	Sarah Smith	E-mail	August 6, 2020
I-Smoot	Steve Smoot	E-mail	August 5, 2020
I-Snyder	John Snyder	E-mail	August 6, 2020
I-Sontag	Carol Sontag	E-mail	July 23, 2020
I-Soxharris	Alex Sox-Harris	E-mail	July 1, 2020
I-Spak	Margar Spak	E-mail	August 6, 2020
I-Spangler_J	Jon Spangler	E-mail	August 9, 2020
I-Spangler_M	Mary Spangler	E-mail	August 6, 2020
I-Stanke	Fred Stanke	E-mail	August 4, 2020
I-Stansfield	Lesley Stansfield	E-mail	July 14, 2020
I-Stern	Kathleen Stern	E-mail	August 4, 2020
I-Stocker	Eric Stocker	E-mail	August 7, 2020
I-Strahorn	Chris Strahorn	E-mail	August 8, 2020
I-StringerCalvert	David Stringer-Calvert	E-mail	August 2, 2020
I-Strnad	Jason Strnad	E-mail	July 8, 2020
I-Sullivan	Jim Sullivan	E-mail	July 23, 2020
I-SunMillbrae	Jadie Sun-Millbrae	E-mail	July 13, 2020
I-Swanson	Stacey Swanson	E-mail	August 4, 2020
I-Switzer	Cathy Switzer	E-mail	August 8, 2020
I-Szybalski	Andy Szybalski	E-mail	August 10, 2020
I-Taylor_K	Kent Taylor	E-mail	August 4, 2020
I-Taylor_W	Warrick Taylor	E-mail	August 5, 2020
I-Tepedelenioglu	Emre Tepedelenioglu	E-mail	August 9, 2020
I-Thomas	Winston Thomas	E-mail	August 4, 2020
I-Tonetti	Caroline Tonetti	E-mail	July 9, 2020

10. List of Persons Commenting

Table 10-1 Agencies, Organizations, Individuals Commenting on the Draft EIR (continued)

Committer Code	Name, Title and Affiliation of Commenter	Format	Date
INDIVIDUALS (CONT.)			
I-Towey	David Towey	E-mail	August 10, 2020
I-Trapp	Onnolee Trapp	E-mail	August 6, 2020
I-Trewin	Laura Trewin	E-mail	June 30, 2020
I-Turner	April Turner	E-mail	August 7, 2020
I-Turri	Jean Turri	E-mail	August 9, 2020
I-Upp	Rex Upp	E-mail	August 4, 2020
I-Vance	Wyles Vance	E-mail	August 8, 2020
I-Vandeman	Mike Vandeman	E-mail	June 27, 2020
I-VanSchoyck	Manon VanSchoyck	E-mail	August 6, 2020
I-Vaughan	Brandon Vaughan	E-mail	August 10, 2020
I-Vetter	Keith Vetter	E-mail	August 5, 2020
I-Vroom	Jeff Vroom	E-mail	July 11, 2020
I-Walczak	Susan Walczak	E-mail	August 6, 2020
I-Walsh	Steve Walsh	E-mail	August 9, 2020
I-Warne	Kathy Warne	E-mail	August 8, 2020
I-Weber	James Weber	E-mail	June 29, 2020
I-Wegner	Glenn and Linda Wegner	E-mail	August 8, 2020
I-Weiden	Cheryl Weiden	E-mail	July 11, 2020
I-Weil	Nina Weil	E-mail	August 5, 2020
I-White	Maggie White	E-mail	August 10, 2020
I-Wild	Lani Wild	E-mail	August 5, 2020
I-Willard	Ann Willard	E-mail	August 7, 2020
I-Willcox	Michelle Willcox	E-mail	August 8, 2020
I-Wilson	Bryan Wilson	E-mail	August 4, 2020
I-Winsor	Charity Winsor	E-mail	August 4, 2020
I-Winter	Joel Winter	E-mail	August 9, 2020
I-Wisniewski	Damian Wisniewski	E-mail	August 10, 2020
I-Wood	Chris Wood	E-mail	July 5, 2020
I-Woodward	Ted Woodward	E-mail	August 10, 2020
I-Wright	Beverly Wright	E-mail	August 6, 2020
I-Wyman	Will Wyman	E-mail	August 6, 2020
I-Wynne	Sara Wynne	E-mail	August 4, 2020
I-Ycasas	Joyce Ycasas	E-mail	July 23, 2020
I-Yost	Daniel Yost	E-mail	July 4, 2020
I-Young	Neil Young	E-mail	August 10, 2020
I-Zamel	Karen Zamel	E-mail	August 6, 2020
I-Zampino	Peter Zampino	E-mail	July 6, 2020
I-Zavestoski	Stephen Zavestoski	E-mail	August 8, 2020
I-Zermeno	E. Zermeno	E-mail	August 6, 2020
I-Zhu	Darren Zhu	E-mail	August 10, 2020

CHAPTER 11

RESPONSES TO COMMENTS

11.1 Organization

This section presents the substantive comments received on the draft EIR and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the draft EIR. The planning department did not receive comments on all draft EIR subjects; therefore, the number of subjects listed below and addressed in this RTC is smaller than the number in the draft EIR.

General comments on the EIR, including comments on the merits of the proposed project, grouped together at the end of the chapter. Comments unrelated to a specific draft EIR section or impact category are also classified as general comments. Comments on specific mitigation measures are included under the comments regarding the relevant impact category of the draft EIR.

The order of the comments and responses in this chapter is shown below, along with the prefix to the subject and response codes (indicated in square brackets):

11.2 Project Description [PD]	11.7 Hydrology and Water Quality [HY]
11.3 Plans and Policies [PP]	11.8 Hazards and Hazardous Materials [HZ]
11.4 Transportation and Circulation [TR]	11.9 Public Services [PS]
11.5 Noise and Vibration [NO]	11.10 Alternatives [AL]
11.6 Biological Resources [BI]	11.11 General Comments [GC]

Within each section under each subject area, similar comments are grouped together and identified using a topic code prefix and sequential numbering for each subtopic. For example, Project Description comments [PD] are listed as PD-1, PD-2, PD-3, and so on; the responses to each subtopic are similarly coded as Response PD-1, PD-2, PD-3, etc. Each topic code has a corresponding heading that introduces the comment subject; these subsections reproduce the comments and include the commenter's name and the comment code described in Chapter 10, List of Persons Commenting. Comments containing language that is unique to an individual commenter are presented verbatim. Comments that contain language that is substantially similar or identical to that of four or more other comments are grouped and one of the comments, referred to as a "representative comment," is presented verbatim.

The reader is referred to Appendices F and G for the full text and context of each comment letter or email, as well as the public hearing transcript. In those appendices, the bracketing of the substantive comments and the associated comment code and response code are provided in the margin of each comment, allowing the reader to locate the response to an individual comment.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment and to clarify or augment information in the draft EIR as appropriate. Response numbers correspond to the topic code; for example, the response to Comment PD-1 is presented under Response PD-1. The responses may clarify the draft EIR text or revise or add text to the EIR. Revisions to the

11. Final EIR

11.1 Organization

draft EIR are shown as indented text. New or revised text, including text changes initiated by planning department staff, is double underlined; deleted material is shown in ~~striketrough~~.

Footnotes included in written comments are numbered as in the original letter or email and thus may be non-consecutive. Footnotes to responses are indicated by consecutive letters.

11.2 Project Description

The comments and corresponding responses in this section cover the subjects included in draft EIR Chapter 2, Project Description. The comment topics relate to:

- PD-1: Project Elements
- PD-2: Barbed Wire Fencing
- PD-3: Watershed Rules - Compliance and Enforcement
- PD-4: Permits/Approvals
- PD-5: Project Objectives

Comment PD-1: Project Elements

This response addresses the following comments, which are quoted below:

A-Caltrans.2, O-Midpen.2, I-Brousseau-7.1, I-Brousseau-8.2, I-Fox.3, I-German.10, I-Johnson_M.2, I-Molitor-2.7, I-Molitor-3.5, I-Naranjo-1.4, I-Naranjo-2.2, I-Oldendorp.1, I-Ozaki.2, I-Smetters.3

“For Section 2.6.12 Construction Schedule on page 111, please update the construction schedule which currently states “project construction would begin in the summer of 2020”. (Mark Leong, Caltrans, Letter via Email, July 30, 2020)

“In 2017, the District submitted a comment letter regarding SFPUC’s Notice of Preparation (NOP) for the Project EIR. In that letter, the District requested a meeting with SFPUC staff to discuss potential Project impacts to District lands, specifically the North Ridge Parking Area at Purisima Creek Redwoods Open Space Preserve where there is high visitation and parking constraints. Since 2017, the District has met with SFPUC, Ridge Trail, and Peninsula Open Space Trust (POST) staff numerous times to discuss a regional planning partnership opportunity to evaluate a multi-use trail crossing at Skyline Boulevard that connects the Ridge Trail between SFPUC lands and Purisima Creek Redwoods, as well as North Ridge Parking Area improvements to address expanded parking needs for this Project. The District is pleased to see SFPUC’s commitment described on page 2-16 to work with the District and contribute funding to study the feasibility of this crossing and parking area improvements. While the District would lead this planning study, we appreciate the collaboration and funding from SFPUC, Ridge Trail and POST to move forward with this work.” (Ana Ruiz, Midpeninsula Regional Open Space District, Letter via Email, August 10, 2020)

“Names are important, and carry strong connotations that weigh heavily when people make decisions.

I notice that the current naming conventions for the three Variants of the access give negative connotations to Variants 2 and 3, yet Variant 1 does not have a consistent name, and thus may be treated more favorably by decision makers. In particular, Variants 2 and 3 have multiple occurrences of the "un" prefix, which means "not" and is negative - while also implying 100%.... which is incorrect in the context of these definitions -- all variants have restrictions.

In contrast, Variant 1 does not currently contain any negative connotations.

11. Responses to Comments

11.2 Project Description

This is clearly evident on page 112 if you are looking for specific examples, although these terms are used throughout the document.

I request that the EIR change the currently used terms to be correct and fair, which the current terms are not. I also request that the names include the named mode of use, to make it easier to understand in this long and complex document what is being proposed.

Some background where these terms are defined:

page 115

Variant 1 - 2.7.1.2 Access Program Variant 1 (Docent Program) current commonly used name: Variant 1 (Docent Program)

page 116

Variant 2 - 2.7.1.3 Access Program Variant 2 (Unsupervised/Unrestricted Access) current commonly used name: Variant 2 (Unsupervised or Unrestricted Access - used interchangeably)

page 116

Variant 3 - 2.7.1.4 Access Program Variant 3 (Unsupervised/Restricted Access) current commonly used name: - Variant 3 - Unsupervised / Restricted Access

I recommend that the EIR use the following, or similar names:

Variant 1 - Severely Restricted / Supervised - Docent Only (hike/bike)

Variant 2 - Restricted / Unsupervised - hike/bike/equestrian

Variant 3 - Highly Restricted / Unsupervised - hike only

It is likely that these could be simplified or improved, but the main idea is to name the Variants in descriptive ways that do not explicitly favor one Variant over the other through connotation or fear... which is important for Public Decision Makers to make a fair and informed decision about this important project.” (Christopher Brousseau, Email, August 10, 2020)

“Variant 1 is unworkable, and does not mitigate any environmental risks identified in the EIR.” (Christopher Brousseau, Email, August 4, 2020)

“4) Please consider COVID and the need for access to nature. The SF Watershed should be open from sunrise to sunset for pedestrian access (non-docent), during non-fire risk times of the year.” (Jamie Fox, Email, August 10, 2020)

“If we understand the proposals correctly, the people that would benefit the most from this trail, the residents of Kings Mountain, would have to drive 4-10 miles to the access point at Highways 92 and 35 to hike a trail within 300 feet of their homes. This does not make environmental sense. A gate key system similar to Woodside’s Equestrian Trail would be very appealing.” (Carrie German, Email, July 23, 2020)

“Variant 1 is unworkable and does not mitigate any environmental risks identified in the EIR.” (Mike Johnson, Email, August 9, 2020)

“(P.S. if the plan goes forward, as I expect most complaints will simply be shrugged off, I strongly suggest additional bathrooms be placed directly at 92 and 35 as well as large trash containers.)” (Jerry Molitor, Email, June 25, 2020)

“... there is absolutely no addressing of a parking lot at the end of the trail. It currently just terminates to an area where there is already an overloaded parking lot. I think there needs to be an investigation into the environmental impact of adding a parking lot there as well.” (Jerry Molitor, Planning Commission, Hearing Comments, July 23, 2020)

“More importantly, the EIR should take into consideration that some of the existing trails in this project are currently used for SFPUC vehicular traffic, which likely has a more significant impact than that of unaccompanied hikers and cyclists.” (Michael Naranjo, Email, August 6, 2020)

“Number four (sic), the report should consider the fact that there are currently trucks that use the Fifield-Cahill Ridge for maintenance and other uses. There is also an operating golf course and a quarry within the watershed area. And so the concerns that are noted in the report should also be considered along with the existing uses.” (Michael Naranjo, Planning Commission, Hearing Comments, July 23, 2020)

“In regards to the watershed trail project. I read a few different reports. One question in which the reports are vague on is what does the south end of the trail look like where it will meet phleger road? One report says visitors will have to turn around and walk back. Another report just says trail ends. Another report says the trail will eventually be connected to the lonely trail. It seems unclear as to what this end of the trail will look like.” (Jason Oldendorp, Email, June 26, 2020)

“Variant 1 is unworkable, and does not mitigate any environmental risks identified in the EIR.” (Tsuyoshi Ozaki, Email, August 10, 2020)

“In contrast, Variant 1 does not mitigate any environmental risks identified in the EIR.” (Diana Smetter, Email, August 10, 2020)

RESPONSE PD-1

CONSTRUCTION SCHEDULE

Comment A-Caltrans.2 requests an update to the construction timeline outlined in draft EIR Section 2.6.12, Construction Schedule, as it currently states construction would start summer of 2020. The commenter is correct that this schedule is out of date, and all references to a construction start date of summer 2020 throughout the draft EIR have been revised to reflect a start date of summer 2022.

11. Responses to Comments

11.2 Project Description

The text of the fourth paragraph on p. 2-28 is revised as follows in response the updated construction schedule:

Project construction would begin in the summer of ~~2020~~ 2022 and could continue into the summer of ~~2021~~ 2023. During the approximately 12-month construction period, the SFPUC would concurrently construct project components north and south of S.R. 92, as described in Section 2.6.9, Project Workforce.

The third bullet point on p. 4.1-5 is revised as follows in response the updated construction schedule:

Timing and Duration of Implementation. Construction of the project would span 12 months and is anticipated to commence in summer ~~2020~~ 2022 (refer to Section 2.6.10, Construction Equipment, in Chapter 2, Project Description) and be completed in summer ~~2021~~ 2023.

The third paragraph on p. 4.7-10 is revised as follows in response the updated construction schedule:

This analysis is based on estimates of GHG emissions from project construction derived using the CalEEMod emissions estimator model (version 2016.3.2); as input to the model, the SFPUC provided data on construction equipment fleet and activity for the proposed access program and variants (see Table 2-1 in Chapter 2, Project Description). Project construction activities would occur over approximately 12 months (~~between summer 2020 and summer 2021~~). The resulting exhaust emissions from off-road equipment, on-road trucking, and construction worker commute traffic during this period would contribute minimally to long-term regional GHG emissions.

PROJECT VARIANTS

Comments I-Brousseau-8.2, I-Johnson_M.2, I-Ozaki.2, and I-Smetters.3 include general statements regarding access program variant 1 and its ability to mitigate environmental risks identified in the draft EIR. Comment I-Brousseau-7.1 addresses the draft EIR's naming conventions for the three access program variants analyzed. The purpose of the EIR is to evaluate the potential effects of the proposed project on the environment. As presented in EIR Chapter 2, Project Description, Section 2.7.1, Trail Access Management Program and Visitation, the project includes a proposed access program and three variants. As explained in this section on draft EIR p. 2-29, the variants were developed in response to public comments received during the public scoping period requesting that the SFPUC consider access options in addition to the proposed access program. In order to address these comments, and to allow flexibility in crafting an access program that responds to ongoing watershed management requirements and environmental and economic considerations, the SFPUC crafted a CEQA project description that includes three additional public access program variants with differing levels of restrictiveness. The variants are part of the project, not mitigation measures intended to reduce the project's environment effects. Therefore, in accordance with CEQA Guidelines section 15126, the EIR evaluates the potential environmental effects of each.

With respect to the EIR's variant naming convention, the focus of public review under CEQA Guidelines section 15204 should be on "the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." The terminology used to describe the project variants has no bearing on the EIR's conclusions regarding their potential environmental effects. While not relevant to the adequacy of the EIR's analysis of potential project

effects on the environment, the commenter's preference for the use of different terminology to describe the project variants is noted.

COMMENTS REGARDING PROJECT FEATURES

Several comments (I-Fox.4, I-German.10, I-Molitor-2.6, I-Molitor-3.5), include requests that the project description be revised to add or modify various elements (e.g., access hours, gates, restrooms, parking lots). The purpose of the EIR is to evaluate the potential effects of the project, as proposed by the SFPUC, on the environment. While none of the comments in this group relate to the adequacy of the environmental analysis in the EIR, the commenters' stated preferences are noted and part of the record for the SFPUC to consider.

Comment I-Oldendorp.1 requests clarification regarding the configuration of the southern skyline ridge trail terminus. As described in Chapter 2, Project Description, Section 2.5.1.1, Southern Skyline Boulevard Ridge Trail Extension, the trail would extend south for approximately 6 miles, generally following S.R. 35 from S.R. 92 to the southern boundary of the SFPUC property at the GGNRA's Phleger Estate. A connection between the southern skyline ridge trail and the existing Lonely Trail near the Kings Mountain Fire Brigade on the GGNRA side of the property boundary could be established in the future. The proposed project does not include such a connection. Southern skyline ridge trail users would be required to turn around at the watershed boundary and return via the same path. As mentioned in comment O-Midpen.2, a connection to the nearby Purisima Creek Redwoods Open Space Preserve could be established in the future. While the proposed project does not include such a connection, the draft EIR does acknowledge on p. 2-16 that one could be established in the future, and describes a gate within the perimeter fence to accommodate this.

Comments I-Naranjo-1.4 and I-Naranjo-2.2 state the EIR should consider that some of the project trails are currently used by SFPUC vehicles. The commenter correctly notes, and the draft EIR acknowledges, that some of the proposed access and trail improvements would occur along service roads which receive regular traffic. This is noted in Chapter 2, Project Description, Section 2.2, Background, which states on pp. 2-5 in reference to an early project concept, "...the trail would extend along the Fifield-Cahill service road..." Existing use of the service road is considered as part of the project area's baseline condition, against which potential project environmental effects are evaluated in the EIR. See, for example, Section 4.8, Biological Resources, which states on p. 4.8-48:

However, it is also important to note that much of the potentially affected project area is already disturbed and/or regularly used by SFPUC staff and visitors. For example, SFPUC staff drive on the Fifield-Cahill ridge trail between Cemetery Gate and Five Points approximately 3 to 5 times per day, and between Five Points and Portola Gate (at Sweeney Ridge) approximately 1 to 3 times per day. In addition, approximately 10 to 20 visitors (i.e., hikers, bicyclists, and equestrians) use the trail under the existing docent program, up to three days per week.^{101,102} As discussed in Section 4.8.2.4, *Vegetation and Habitat Types*, the SFPUC annually mows watershed roads, including the Fifield-Cahill ridge trail, and maintains them (e.g., patching) every two to five years.

¹⁰¹ John Fournet, Community Liaison, SFPUC, Visitor and SFPUC use Fifield-Cahill ridge trail (file note), September 4, 2019.

¹⁰² San Francisco Public Utilities Commission, Annual Fifield-Cahill Ridge Trail Usage, August 23, 2003 Through December 31, 2017, 2017, Table: Number of Trail Participants/Docents by Event Type.

Comment PD-2: Barbed Wire Fencing

This response addresses the following comments, which are quoted below:

A-CPC-Diamond.1, I-Brousseau-4.1, I-Chavez.2

“Yes. I have a question on Page 2-18 of the draft EIR under the paragraph entitled, "Security Features." The paragraph describes how much of the trail will have barbed wire fencing, off of the trail, sometimes as close as 5 feet from the trail centerline. The paragraph says that the fencing is necessary to minimize risk to public health and safety, but doesn't go into detail about what those risks are. So it would be helpful, I think, if there was a greater explanation of what the risk is, that requires a fence, why the fence needs to be barbed wire, and more importantly, why it needs to be so close to the centerline, because a barbed wire fence seems at odds with the notion of a trail that's facilitating public access. So, in the Response to Comments, it would be helpful if those questions could be addressed. Thank you.” (Sue Diamond, Planning Commission, Hearing Comments, July 23, 2020)

“Page 103 states: "In addition, under the unsupervised access management variants (variants 2 and 3, discussed further in Section 2.7.1, Trail Access Management Program and Visitation), the SFPUC would install barbed-wire fencing along the Fifield-Cahill ridge trail. This fencing would include approximately 8 miles of new fencing along both sides of the trail (16.3 miles in total) between Portola Gate and Cemetery Gate. I request that the EIR evaluate options for Variants 2 and 3 that do NOT include installation of barbed wire fencing along the Fifield-Cahill portion of the project --- exactly the same as proposed for Variant 1. This is an inappropriate, unnecessary and ineffective installation of fencing that further risks damaging the ecosystem - far more than the low risk of someone stepping a few feet off the trail. Further, this creates no real security improvement for the watershed." (Christopher Brousseau, Email, August 9, 2020)

“Many San Bruno residents, including my family, walk the Crystal Springs trails. We are faced with an ugly fence throughout our beautiful walk. It impedes our view throughout the walk. We are responsible adults that would not damage the environment. Please remove the fences and allow us to walk freely. I have received many inquiries from my constituents that ask me why the fences still exist. I do not have a logical answer for them.” (Teri Chavez, Email, July 6, 2020)

RESPONSE PD-2

This group of comments concerns the proposed barbed wire fencing in association with project access configurations allowing for unsupervised watershed access. Generally, the Peninsula Watershed Management Plan calls for installing fencing, barriers, and other measures to protect watershed resources, namely water quality. For example, the management plan's Action haz4 calls for the installation of barriers or fencing to prevent access to reservoir edges and dams to prevent illegal dumping.¹

¹ San Francisco Public Utilities Commission, *Peninsula Watershed Management Plan*, Spring 2002, p. 5.3-2

The management plan also includes several similar policies and actions aimed at reducing the potential effects of unpermitted activity that can result from unsupervised watershed access.² For example, Action 6 calls for the periodic and systematic inspection and repair of watershed perimeter fencing, access gates, and locks to minimize trespassing, illegal dumping, etc.³ The plan's fire management Policy F8 calls for restricting access to the watershed and implementing strict fire hazard reduction practices, among other measures.⁴ Management plan Appendix A, Fire Management Element, calls for the use of fencing and gates, among other measures, to restrict public access within the watershed to mitigate potential fire risk.⁵ The management plan states further that a ridge trail project that provides unsupervised public access would require implementation of these measures and additional access barriers to prevent off trail use in sensitive locations.⁶

In 2018, the planning department commissioned a survey of recreational land managers from San Mateo County Parks, Midpeninsula Regional Open Space District, and Golden Gate National Recreation Area regarding unsupervised public access. The survey asked about improper uses observed, environmental impacts from such uses, and measures undertaken to curb such improper uses and effects.⁷ The responses indicated that improper use of public recreational lands in the vicinity of the Peninsula Watershed are not uncommon, and include trail creation/off-trail travel, smoking, littering of food waste or packaging, and dog walking/off-leash dogs. The responses also indicated that these improper uses can cause erosion, increase risk of wildland fire, negatively affect visual resources and threaten wildlife. However, the land managers surveyed also responded that posting educational signage, installing fencing and physical barriers, performing regular maintenance, and conducting daily patrols and enforcement have been effective at curbing significant impacts from these improper uses.⁸

With respect to the potential effect of fencing on views, the EIR analyzes the proposed project's potential effects on visual resources and views in Section 4.2, Aesthetics. As explained on p. 4.2-14:

Project changes would generally occur proximate to existing development or management activities, would be similar in size and scale to those developments or activities, and would be subordinate to the aesthetic resources that contribute to the watershed's high scenic quality (i.e., topography, vegetation, and vistas) ... While some project changes would be intermittently visible to motorists traveling along S.R. 35 as well as to visitors to the Bay Area Ridge Trail (including Fifield-Cahill ridge trail and Sweeney Ridge Trail), the effects would be minimal due to the nature of the project proposal and intervening vegetation and topography.

For these reasons, the EIR concludes that while the fencing and other project features would be visible from public vantage points, the effect on views and other visual resources would not be substantial.

² Ibid, p. 4.2-3

³ Ibid, p. 5.8-3

⁴ Ibid, p. 4.8-2

⁵ San Francisco Public Utilities Commission, *Peninsula Watershed Management Plan*, Appendix A-1, *Peninsula Watershed Fire Management Element*, Spring 2002, p. 81.

⁶ San Francisco Public Utilities Commission, *Peninsula Watershed Management Plan*, Spring 2002, p. 8-15.

⁷ ESA+Orion, *Land Manager Survey*, Memorandum, January 9, 2018.

⁸ Ibid.

Regarding potential ecosystem effects of fencing, the EIR analyzes the proposed project's potential affects from fencing on special-status species and wildlife corridors in Section 4.8, Biological Resources. Responses to comments related to wildlife migration are addressed in Section 11.6 of this RTC document.

Comment PD-3: Watershed Rules - Compliance and Enforcement

This response addresses the following comments, which are quoted below:

O-CNPS.4, O-GGAudubon.3, O-GGAudubon.8, O-GGAudubon.10, I-Cuviello.3, Luiso.2

“5) Unrestricted access will mean creation of unauthorized trails, promoting erosion and introducing/increasing nonnative plants and impacting wildlife.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“1. People break rules if they can. Without docents, unsupervised recreation users will break the rules in the Crystal Springs watershed (Watershed). Environmental impacts cannot be predicted based on the assumption that rules will be followed once the Watershed is open to unsupervised use. Therefore:

- i) Cost projections must be based on staffing and maintenance levels that will be effective.
- ii) At the same time, risk assessments (for fire danger, water quality impacts, etc.) must be based on the actual staffing and funding that will be available.

Experience as well as academic studies of human behavior in parks confirm the inevitability of widespread rulebreaking:

- The 2013 Hetch Hetchy Rim Fire was started by illegal campfire
- Illegal mountain biking trails are causing widespread destruction of soils and conflicts with other users in the Bay Area and nationwide (Clark, 2014).
- A study of “informal trails” in a large wildland park in Portland, OR examined the creation and use of unauthorized trails and their impacts on park resources (Van Winkle, 2014). She mapped 382 unauthorized trails in the 5,000 acre park.
- “Informal trails, tend to follow less sustainable alignments and are generally unmonitored, resulting in greater erosion and soil compaction, and likely serve as vectors in the spread of non- native and invasive species.” (Van Winkle, 2014)
- “People will do what they think they can get away with” was one conclusion of a 2011 survey of Bay Area open space managers (EBRPD, 2011). In other words, if docent supervision is removed from the Crystal Springs Watershed, it does not matter what rules are put in place, people will break them.
- Unauthorized, illegal trail proliferation is likely in absence of Docent supervision in the Watershed (see e.g. EBRPD, 2011; GGNRA, 2011; Van Winkle, 2014; Clark, 2014)
- The Open Space Survey also concluded: self-regulation (such as is proposed for the Watershed) is generally not effective in publicly-managed park lands (EBRPD, 2011)
- PUC staff have acknowledged that current staffing levels are not adequate to effectively monitor or control invasive or listed species (Pers. Communication, 2014)

Therefore, environmental analyses, cost projections, and management decisions must be based on the understanding that comprehensive, diligent (and thus expensive) implementation and enforcement programs are prerequisite to the adherence to and effectiveness of resource protection rules.” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“6. Dogs: No matter what the managers promise, if the Watershed is opened and docents are removed, people will break the rules and bring dogs into the Watershed. All studies reviewed for this Compendium reported widespread rule breaking by wildland users (shortcutting off established trails, deposition of litter, urine, feces and other waste, speeding, trespassing into closed areas, etc.). It is not logical to assume that dog owners will be the sole exception to this pattern.

- In the Golden Gate National Recreation Area, in 2007 alone, over 800 warnings were issued regarding dogs illegally off leash or in closed areas (GGNRA, 2011. Appendix G).” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)
-

“• Changes in the culture of some outdoor recreationists appear to have increased conflicts between law enforcement and some user groups as well as among user groups:

- For dogs, at the GGNRA, law enforcement personnel must work in pairs. “It is assumed by staff that any contact with a dog owner regarding dog walking regulation compliance will be confrontational” (GGNRA, 2011, p. 287)
 - For bicycles, higher speeds, steeper slopes and better-gripping “fat” tires have to increased soil damage and conflicts with other users (Clark, 2014)
 - “Trail Rage” is now a new documented problem. For example in Marin, a news reports documented conflicts between bikers and horses and hikers, particularly the elderly. One hiker told reporters “I feel like some of the younger mountain bikers aren’t respectful,” (Alexander, 2015)
 - The Open Space Survey found that high speed biking is a problem throughout Bay Area. Managers are forced to use ATV and bike patrols, radar guns and other labor and cost-intensive methods to attempt to stop bike speeding. (EBRPD, 2011)
 - Terrorism, crazy people: People are increasingly destructive as well as hostile. Should we give people easier access to our water supply? For example 6.4 mass shootings/year between 2000-2006. Between 2007 and 2013, there were 16.4 mass shootings/year. (Ehrenfreund and Goldfarb, 2015).” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)
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“Bikers are notorious for going off trail and are a major cause of erosion to trails and the surrounding environment. Our open space in Belmont-Water Dog Preserve-is a prime example of how bikers damage the environment. Bikers using Water Dog have cut deep ruts in many of the trails in Water Dog. Bikers also regularly go off trail, even going around barriers, creating deep grooves in the hillsides, wiping out the vegetation and creating wide swaths of dirt, which I call nuclear zones. One downhill off trail cut-through created six to seven feet of erosion, Even after the City put up a netting barrier around this cut-through bikers went around the barrier disregarding the erosion and the City’s desire to stop it. Bikers have also dug holes in the open space and used the dirt to create jumps and berms, which allow them to ride faster around the curves. They also ride up on the hillsides on the curves to create berms on the hillsides, which degrades the hillsides. Unrestrained sport mountain biking has caused even worse damage in the privately owned open space adjacent to Water Dog, on the other side of Hastings Drive, behind Carlmont High School. This area has become an ecological disaster due to biker use. My opinion of bikers is that as

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a group they have no respect for the integrity of natural areas as they are just looking for cheap thrills regardless of the environmental damage it causes. Bikers also ignore the rules and routinely ride in the open space at night, not only further degrading the open space but also disrupting the many nocturnal wild animals, who are hunting or foraging for food. I would be glad to give you a tour of Water Dog and show you the damage done by bikers if you would like to see it personally. Attached are photos of some biker damage In Water Dog.” (Pat CuvIELlo, Email, August 8, 2020)

“You can visit our own Water Dog Preserve in Belmont to witness firsthand the negative effects mountain bikers have wrought on this pristine piece of nature that exists among our neighborhoods. No matter that they are illegal, the bikers continue to create and use off-road trails destroying the natural habitat, frightening away the native wildlife, and nearly colliding with day-use walkers.

“Whenever humans are allowed into pristine areas, litter and destruction are bound to occur. People simply cannot help themselves from behaving badly. And the quiet beauty of these outdoor landscapes will suffer the consequences if we allow humans to enter them.” (Mark Luiso, Email, August 9, 2020)

RESPONSE PD-3

This group of comments concerns unsupervised access and the improper uses of the trail and watershed that could occur as a result.

As explained in Chapter 2, Project Description (p. 2-29), the project includes and the EIR evaluates the potential effects of multiple access program configurations, including access programs in which visitation would be supervised and others in which it would be unsupervised. Unsupervised access along the entirety of the trail would be provided under access program variants 2 and 3 and along the southern skyline ridge trail under the proposed access program. Security features to control and prevent improper uses of the trail and surrounding lands would be implemented under the proposed access program and all access program variants. Please see Chapter 2, Project Description, p. 2-18 for a discussion of security features proposed along the southern skyline ridge trail extension and see p. 2-20 for security features proposed along the Fifiield-Cahill ridge trail. Additionally, the draft EIR explains on pp. 2-31 and 2-33 that the SFPUC would conduct patrols under any access program configuration that allows for unsupervised access.

The EIR acknowledges that, while most visitors would be expected to follow watershed rules and would be dissuaded from improper use by the previously mentioned security features, some level of non-compliance would be expected. Effects of such non-compliance are accounted for in the impact discussions; for example, please see Section 4.2, Aesthetics, p. 4.2-15; Section 4-8, Biological Resources, pp. 4.8-87, 4.8-91, 4.8-98, etc.; Section 4.9, Geology, Soils, and Paleontological Resources, p. 4.9-24; Section 4.10, Hydrology and Water Quality, p. 4.10-21; Section 4.11, Hazards and Hazardous Materials, p. 4.11-28; and elsewhere.

Comment PD-4: Permits/Approvals

This response addresses the following comments, which are quoted below:

A-CALFIRE.1, A-CDFW.4

“Thank you for the opportunity to review the SFPUC Southern Skyline Boulevard Ridge Trail Extension Project Draft Environmental Impact Report (DEIR). We have reviewed the DEIR and have no additional comments. As stated in the DEIR, the project area is classified as “Timberland” as defined under Public Resources Code (PRC) section 4526 and a timberland conversion permit or timber harvest plan (THP) would be required prior to the cutting of commercial tree species. Please contact me if you have any questions.” (Richard Sampson, CALFIRE, Letter via Email, July 17, 2020)

“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 (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.” (Gregg Erickson, California Department of Fish and Wildlife, Letter via Email, August 6, 2020)

RESPONSE PD-4

The EIR identifies anticipated project approvals in Section 2.8, Intended Uses of the EIR and Approvals Required. This section addresses the potential requirement for a California Department of Forestry and Fire Protections authorization for removal of trees in a timberland area and a California Endangered Species Act permit if the project cannot avoid substantial adverse effects on species listed under the act. These potential permit requirements are also discussed in Section 4.8, Biological Resources, on pp. 4.8-41 and 4.8-42, respectively. Lake or streambed alteration agreements administered by the California Department of Fish and

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Wildlife are also acknowledged on p. 4.8-41, but are not listed in Section 2.8. As no component of the project would substantially divert, obstruct, or change the natural flow of a river, stream, or lake; substantially change the bed, channel, or bank of a river, stream, or lake; or use material from a streambed, a lake or streambed alteration agreement is not anticipated.

Comments noting certain requirements for permits or approvals do not raise specific issues concerning the adequacy or accuracy of the EIR under CEQA. Review and application for appropriate permits and approvals is carried out independent of the CEQA process.

Comment PD-5: Project Objectives

This response addresses the following comments, which are quoted below:

I-Brousseau-9.1

“page 92 & 93 outline the objective of the project, including:

Objective 4 - Improve the existing Fifield-Cahill ridge trail to enhance access (including access for people with disabilities), parking, and restroom facilities

Objective 5 - Support the Bay Area Ridge Trail Council’s goal of creating a continuous multimodal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay page 115-116 outline the proposed Access Variant 1 (Docent Program).

Access Variant 1 fails to meet either Objective 4 or Objective 5 of the project, and should be eliminated or modified to meet the objectives of the project.

Importantly - relating to Objective 4 - access. The current docent program is a failure in terms of access, as noted by footnote 32 on page 115 -- where a mere 866 people (all hikers) were able to use the Fifield-Cahill trail in an entire year. The estimated numbers of people for Variant 1 are artificially high, as very few people are actually available to go hiking during the times the docents feel like hosting a tour. **Therefore, Variant 1 fails to create additional access to meet Objective 4.**

Further Variant 1 fails to create multi-model access to meet Objective 5, as it does not address all the access modes listed in objective 5.” (Christopher Brousseau, Email, August 9, 2020)

RESPONSE PD-5

As explained in CEQA Guidelines section 15124(b), an EIR’s statement of project objectives is intended to help the lead agency develop a reasonable range of alternatives to be evaluated in the EIR. CEQA does not require that an EIR evaluate a project’s conformity with the stated objectives. Nevertheless, the planning department respectfully disagrees with the commenter’s assertion that the project does not fulfill the objectives identified in the comment.

With respect to Objective 4, the draft EIR explains in Section 2.5.1.2, Fifield-Cahill Ridge Trail Improvements (pp. 2-18 through 2-20), that the SFPUC would construct a new trailhead, restroom, parking lot, and universal access loop trail. These trail improvements would be constructed under the proposed project and all variants. Regarding Objective 5, the draft EIR explains in Section 2.7.1, Trail Access Management Program (p. 2-29),

“Both the proposed access program and the variants would provide multi-modal access (pedestrians, bicyclists, equestrians).”

Concerning current visitation under the existing docent program, the draft EIR notes in Section 2.6, Project Construction (p. 2-21).

“Under the current program, up to 9,380 visitors per year are allowed to access the Fifield-Cahill ridge trail; however, visitor counts indicate that the number has averaged about 866 people annually over the program’s more than 14-year history.¹⁷”

¹⁷ San Francisco Public Utilities Commission, *Annual Fifield-Cahill Ridge Trail Usage, August 23, 2003 Through December 31, 2017*, 2017, Table: Number of Trail Participants/Docents by Event Type.

Contrary to the commenter’s assertion that all visitors under the docent program are hikers, visitation between August 2003 and December 2017 included 8,642 hikers/runners, 2,065 bikers, and 381 equestrians.⁹ Please refer to Response GC-3 for discussion of equitable access under the proposed project.

Regarding the EIR’s characterization of potential visitation under variant 1, the purpose of the EIR is to evaluate the potential effect of the project proposed. Under variant 1, visitation would be limited to 60 people per day, 240 per week, 12,480 per year, per trail segment (i.e., Fifield-Cahill ridge trail and southern skyline ridge trail, as applicable). Accordingly, the EIR conservatively assumes that maximum visitation could be realized over the life of the project and considers the effects that could result. Nevertheless, as explained further in Response GC-6, the EIR does not find that visitation numbers would be a key driver of impacts for docent-led access; as a result, even if the EIR assumed fewer visitors, the impact conclusions would not be expected to change.

⁹ San Francisco Public Utilities Commission, *Annual Fifield-Cahill Ridge Trail Usage, August 23, 2003 Through December 31, 2017*, 2017, Table: Number of Trail Participants/Docents by Event Type.

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11.3 Plans and Policies

The comments and corresponding responses in this section cover the subjects included in draft EIR Chapter 3, Plans and Policies. The comment topics relate to:

- PP-1: Compatibility with Scenic Easement
- PP-2: Compatibility with Fish and Game Refuge Designation

Comment PP-1: Compatibility with Scenic Easement

This response addresses the following comments, which are quoted below:

O-CNPS.2, O-GGAudubon.1, O-GreenFoothills.1

“2) The May 2, 1969 Scenic Easement signed by the Secretary of the Interior and the City & County of San Francisco is unequivocal and forbids a public right to enter the Watershed “for any purpose”.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“I am writing to express serious concern regarding increased unsupervised access to the Watershed area. We believe this proposal is inconsistent with the 1969 Scenic Easement which precludes public access to the Watershed for any reason.” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“We have a long-standing interest in the San Francisco Peninsula Watershed (Watershed) lands. In the late 1960’s we were actively involved in the resolution of the dispute regarding the alignment of I-280 through the Watershed. The resulting Agreement by the City of San Francisco, the United States of America (now administered by Golden Gate National Recreation Area), the State of California Department of Public Works (now Caltrans) and the County of San Mateo established two protective Easements over the Watershed lands, The proposed project is located within lands covered by the Scenic Easement, which strictly limits uses due to the area’s intrinsic value as open space. We concur that the proposed project, which includes supervised access, complies with the Scenic Easement.” (Lennie Roberts, Green Foothills, Email, August 10, 2020)

RESPONSE PP-1

Comments O-CNPS.2, O-GGAudubon.1, and O-GreenFoothills.1 address the project’s compatibility with the 1969 Grant of Scenic Easement.

The statement in O-GreenFoothills.1 regarding use restrictions appear to reference easement restriction 1, which states: “The land shall be preserved in its present natural state and shall not be used for any purpose other than for the collection, storage and transmission of water and protection of water quality, and other purposes, which shall be compatible with said use and preserving said land as open-space land.”

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The inclusion of the phrase “other compatible purposes” in this restriction allows for uses other than those expressly identified, including public recreational uses, as long as they are in keeping with the open space character of the land. This point is discussed further in EIR Chapter 3, Plans and Policies, Section 3.2, U.S. Department of the Interior, Golden Gate National Recreation Area – Scenic Easement and Scenic and Recreation Easement. Section 3.2 explains how the city interprets public recreational access on watershed lands, as well as the associated water-supply-related educational opportunities it affords, as uses compatible with preserving the natural state and open space use of the land.

The statements in O-CNPS.2 and O-GGAudubon.1 regarding the public’s right to enter or access the watershed appear to reference the easement’s conditions, exceptions, and reservations, part c, which states: “The grant herein contained does not in any way and shall not be construed to grant to the public any right to enter the premises for any purpose.” While this statement makes it clear that no part of the easement should be understood to grant public entry, it does not prohibit future access to the lands under easement, provided that access complies with the terms and conditions of the easement, including those discussed above.

Comment PP-2: Compatibility with Fish and Game Refuge Designation

This response addresses the following comment, which is quoted below:

O-GreenFoothills.2

“As noted by the San Francisco Estuary Institute (SFEI), the Watershed’s diverse habitats support the highest concentration of rare, threatened, and endangered species in the nine-county Bay Area. The Watershed lands have also been designated as a State Fish and Game Refuge by the California Department of Fish and Wildlife.” (Lennie Roberts, Green Foothills, Letter via Email, August 10, 2020)

RESPONSE PP-2

The EIR acknowledges the watershed lands designation as a fish and game refuge and considers the project’s compatibility with that designation. Section 3.5.1 (pp. 3-11 and 3-12) describes the history of the watershed’s refuge designation, outlines the restrictions established thereunder, and addresses the project’s compatibility with those restrictions. As discussed in the section, unauthorized “take” of birds or mammals is generally prohibited under the designation without specific authorization. The EIR explains that implementation of the project under certain access configurations could result in take of federally- or state-listed special status species. The section goes on to note that any such actions would require authorization from the government agencies with jurisdiction, and the SFPUC would either obtain such authorization or modify the project to avoid such impacts prior to implementing the project. Therefore, the analysis concludes the project would not result in unauthorized take of birds or mammals in conflict with the designation.

11.4 Transportation and Circulation

The comments and corresponding responses in this section cover subjects in draft EIR Section 4.4, Transportation and Circulation. The comment topics are related to:

- TR-1: Transportation Existing Conditions
- TR-2: Construction Impacts - Traffic Circulation and Parking
- TR-3: Operational Impacts - Traffic Circulation and Parking
- TR-4: Transportation Mitigation Measures
- TR-5: Permits/Approvals

Comment TR-1: Transportation Existing Conditions

This response addresses the following comments, which are quoted below:

I-Brousseau-2.1, I-Chris-1.3, I-Chris-2.2, I-German.4, I-Hettrich.1, I-Johansen-2.2, I-Kromat.1, I-Molitor-2.1, I-Molitor-2.3, I-Polley.2, I-Roberts-1.2, I-Ruby_D.1, I-Sullivan.2, I-Turri.4

“I request that the EIR analyze current vehicle traffic within the project area, which is not included in the EIR now.

Although mentioned in passing - current vehicle usage of the project area is not quantified in any meaningful way - leading the reader and decision makers to assume that there is no meaningful vehicle traffic in this area now in contrast to reality - as the project area is regularly patrolled and used by SFPUC heavy trucks multiple times per day... as witnessed by the number of vehicles a person encounters when on a docent-led tour.”

This analysis should be substantially similar to the analysis of vehicle usage found on page 106 -- construction vehicle usage estimates

Page 283 -- mentions periodic maintenance vehicles, but does not quantify the number and vehicle miles for day / week / year for the daily patrols and maintenance trips, or the nine households that are living in the watershed.” (Christopher Brousseau, Email, August 10, 2020)

“b. Speeders - lots of accidents and really fast drivers on this stretch of the road. Many sections don't have speed limits and apparently people assume that 50 mph is the speed limit. We have been asking for years for a solution to solve this. Deer cross the road and there is often no shoulder to veer to if an animal comes into the road - veering could mean going over a cliff. Maybe consider reducing the speed limit and plan for some signage/enforcement, plus some rails on the steep portions so that people don't drive over a cliff trying to avoid an animal.” (Chris, Email, July 18, 2020)

“Also with Midpeninsula Open Space Trust clearing land on Miramontes Ridge just steps away, there will be more deer that can forage on the cleared land and so more deer crossing Skyline, so traffic speed will be important. Packs of up to six deer are starting to group together just steps from Skyline. There is one sharp steep high curve/slope on 92 driving from 280 West leading up to 35 (where the slope angle is

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marked with a caution sign for trucks) and that is the only portion of the road that I personally feel is dangerous for me. No matter how slow I drive (and with angry cars behind me for driving slowly) I always feel like I might drive over the cliff. I think SFPU owns that land so it would be nice to have a larger shoulder and/or railing because more people will be driving that road to access the new Skyline trails, including the elderly (and hopefully not anyone driving under the influence), so if SFPU owns that land and could put a rail or some other safety on that scary turn due to increased traffic in the area, that would be nice.” (Chris, Letter via Email, July 18, 2020)

“The traffic studies need to be updated, for both week days and weekends. A grade-separated crossing at Highways 92 and 35 is long over due for general safety issues.” (Carrie and Tim German, Email, August 7, 2020)

“Our neighbors and I have no access to any trails unless we get into our cars. Skyline is a very dangerous road for bicycles, equestrians and pedestrians. In most places there are and no shoulders. I see absolutely no danger in the creation of another parking lot 1.5 miles south of Hwy 92 and of having access points along the way.” (Renate Hettrich, Email, August 10, 2020)

“Let us all keep track of the accidents; both vehicular, bicycle, and/or hiker/pedestrian that occur in this area, and on 92. If anything, these areas should be closed to bicycles and hikers. 92, and 35 are 50 mph HiWays. The last thing that is needed in the area is more accidents.” (Fred Johansen, Email, August 9, 2020)

“The junction of highways 35 and 92 has always been treacherous. Cars go too fast in an effort to get across the intersection, merge in a timely manner and avoid the large trucks that are coming from both directions. It would be hard to imagine that any construction in this area would improve the situation.” (Heidi Kromat, Email, July 22, 2020)

“Living over a 1/4 mile north of the Purisima Creek Open Space North parking lot, I have seen how the parking lot is already so overcrowded that visitors find every little nook and cranny that they can to fit their vehicle into anywhere nearby, including completely blocking the area around an emergency callbox. They often leave their cars partly on the roadway, making it extremely dangerous for everyone. There is no regard for, or acknowledgement of, property lines....nor even the “no parking” signs that the Midpeninsula Regional Open Space temporarily utilized. I had one couple who parked at the top of my driveway and blatantly blocked access, then feigned complete ignorance of their wrongdoing but only when directly confronted (they, too, were using my property as a restroom).

I can tell you that people simply do not drive all this way up here only to turn around if there is a sign telling them that the trails or parking lots are full. They simply spread further out and squeeze in wherever they can fit. Considering that they are taking a hike, some of them have no aversion to simply parking further away and walking through private property to reach their destination. Once they are here, they feel entitled to go wherever they please and do as they wish with no regard for the local residents. They then get angry, even when politely notified of their transgressions.

This stretch of road in Kings Mountain already suffers from a lot of car clubs, motorcycles, and individual vehicular traffic racing up and down the highway at unsafe speeds regardless of the numerous blind corners, particularly during nice weather but even when the fog unexpectedly rolls in on them. Everyone

seems to think that this is a vacant racetrack for their personal amusement. This problem is exacerbated even further by the opposingly slow bicycle traffic that forces vehicles to suddenly swerve into oncoming traffic at the last moment due to those blind corners and high rate of speed differential. As a motorcyclist myself, I have not only witnessed numerous close calls but experienced many myself as drivers suddenly swerve or stop completely in the highway to avoid a bicyclist or attempt to parallel park onto a sliver of shoulder barely wide enough for a pedestrian. The frustrated folk who are caught behind these inconsiderate motorists then angrily hit the accelerator as hard as they can once they are free to do so.

Part of the magnificence of this area is not only the solitude that it offers, but the peace and quiet. Adding even more people equates to less solitude and more noise that detracts from the very beauty so many seek from such a small place. Kings Mountain is a finite resource that should remain limited as it simply cannot endure being overwhelmed even further beyond its already-stretched capacity. The roadways and community simply do not have the resources to handle the extra load safely. It is a very precious commodity that will erode severely if access is opened up even further.” (Jerry Molitor, Email, June 25, 2020)

“Living next to an emergency callbox pullout I already have to deal with a lot of noise as people pull over to get their bearing, let speeding cars fly by, or simply take a break for a variety of reasons. They then accelerate quickly and tear up the pullout so much that there are large dips and potholes, causing the larger trucks to slam around and bounce as they use the same space in an attempt to let cars go by (there are few pullouts large enough to accommodate trucks). We already have way too much traffic going on and adding even more foot traffic and parking is only going to make things even worse. And, without fail, every single access point that is close to a trail gets filled up with vehicles, peoples, and bicycles, causing extremely unsafe conditions wherever they try to enter, exit or even cross the highway. (Jerry Molitor, Email, June 25, 2020)

“To be fully addressed:

the dramatic increase of weekend/holiday/pandemic auto traffic and parking along Skyline Boulevard which to date (10 August) requires those of us with homes and driveways off of Skyline to risk life and property” (Claudia Polley, Letter via Email, August 10, 2020)

“When I do ride to Sweeney Ridge, my only options are to double back or take a fairly treacherous loop down highway 1 to Skyline. These aren't bike friendly roads, so almost always opt to backtrack. Opening up Fifield Cahill to the public would make for a great, bike safe way to make a loop of it. As for Skyline, its the same situation. I routinely ride to Woodside up to Skyline Blvd. Sometimes I'll take Skyline all the way west and descent 92 back home. It can be a bit nerve racking without a bike lane or much of a shoulder, and with traffic flying by at 50mph. Most cyclists wouldn't even consider riding in this area for that reason, and end up driving to areas with already over-congested parking. A trail on this western most part of Skyline would really help in that regard.” (Rama Roberts, Email, August 5, 2020)

I live on Skyline Blvd (SLB), 4.5 miles south of Hwy 92 (.3 miles from Purisima Open Space Parking) on the west side. Parking along SLB on the weekends has always resulted in overflow onto the edges of SLB, since CV19 has has been ridiculous with people parking on the active part of the road, private property, in front of fire hydrants, etc. They are also leaving trash and human waste, I can provide pictures. (Dennis Ruby, Email, July 23, 2020)

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“The safety aspect of my request is paramount and I do not feel the safety aspect if bicycle access is limited has been adequately addressed in the draft.

Bicycle riders are in great peril along the Ca 35 highway from 92-Phleger.” (Jim Sullivan, Email, July 23, 2020)

“When your department surveyed the area it was during the week, before Covid, and before the influx of hikers on the Purisma Trail every weekend. It is dangerous to drivers that drive the 35 highway with a posted 50 MPH speed limit and dangerous to hikers.” (Jean Turri, Email, August 9, 2020)

RESPONSE TR-1

Many commenters identify concerns about existing vehicle and bicycle conditions on study area roadways and existing vehicle traffic. One commenter seeks additional information related to existing SFPUC and homeowner vehicle usage on watershed lands. Additionally, several commenters recommend improvements for existing conditions. The transportation setting, including study area roadway operations, pedestrian and bicycle facilities, and public transit service, as described in draft EIR Section 4.4.1, Environmental Setting, on pages 4.4-1 through 4.4-4, is accurate and adequate. On draft EIR pages 4.4-1 through 4.4-4, existing operating conditions on S.R. 92 and S.R. 35 are characterized based on traffic data collected in 2017, and previous efforts by Caltrans and San Mateo County to address existing congestion and safety issues (e.g., uphill climbing lanes for slow-moving trucks, median barriers, retaining walls, intersection improvements, bicycle facilities), associated with these two state highways are discussed. On page 4.4-4, pedestrian, bicycle, and transit facilities are described, including an acknowledgement that roadway shoulders are narrow or discontinuous in some locations due to vegetation and roadway width constraints, which result in little-to-no dedicated pedestrian travel ways and bicycles often times sharing the roadways with automobiles. With respect to the comment on accidents that occur on S.R. 35 and S.R. 92 involving vehicles, bicycles, and pedestrians, please refer to Response TR-3, Project-related Hazards, for the most recent data on reported collisions on S.R. 35 from S.R. 92 to Kings Mountain Road.

One commenter opines that traffic counts should be updated for both weekdays and weekends. The EIR identifies existing traffic volumes and operating conditions on segments of S.R. 92, S.R. 35, and I-280 nearest to the project site, and discusses ongoing efforts by Caltrans and San Mateo County to improve traffic flow through the S.R. 92/S.R. 35 intersections. The Notice of Preparation (NOP) for the EIR for the proposed project was issued on December 21, 2016. Shortly thereafter, the technical analysis was conducted to inform the discussion and conclusions presented in the EIR. As stated on page 4.4-2 of the draft EIR, 2017 daily traffic volumes were used as the basis of analysis in the EIR. The technical analysis is representative of existing conditions at the time the NOP was issued, which is what is required under CEQA Guidelines section 15125(a)(1).

For informational purposes, the most recently available Caltrans daily traffic volumes on S.R. 92, S.R. 35, and I-280 were reviewed. A comparison of 2017 daily traffic volumes with 2019 daily traffic volumes is provided below in **Table 11.4-1**. As shown in the table, traffic volumes have remained relatively constant between 2017 and 2019, with differences of ± 4.0 percent. Such minimal changes in baseline traffic volumes on study area roadways would not alter the analysis or conclusions of the draft EIR.

Table 11.4-1 Daily Traffic Volume Comparison

Roadway	2017 Average Daily Traffic	2019 Average Daily Traffic	Percent Change
S.R. 92 at S.R. 35 South Junction (Milepost 5.2)	26,800- 28,900	27,900- 29,500	+ 3.1%
S.R. 35 at S.R. 92 Junction (Milepost 21.7)	2,500- 3,400	2,500- 3,400	No change
I-280 at S.R. 92 Junction (Milepost 10.9)	96,000- 127,000	92,100- 122,000	- 4.0%
SOURCES: Caltrans, 2017 Traffic Volumes on California State Highways, 2018. Caltrans, 2019 Traffic Volumes on California State Highways, 2020.			

One commenter requests additional information related to existing vehicle traffic, including truck traffic, associated with existing SFPUC maintenance activities. The EIR describes such existing activities generally in Section 2.7, Project Operations and Maintenance. Additional detail on daily traffic is presented in Section 4.8, Biological Resources (p. 4.8-48) which states

SFPUC staff drive on the Fifield-Cahill ridge trail between Cemetery Gate and Five Points approximately 3 to 5 times per day, and between Five Points and Portola Gate (at Sweeney Ridge) approximately 1 to 3 times per day. In addition, approximately 10 to 20 visitors (i.e., hikers, bicyclists, and equestrians) use the trail under the existing docent program, up to three days per week.

The draft EIR also includes additional information on seasonal maintenance in Section 4.2, Aesthetics (p. 4.2-6), which explains:

The SFPUC performs ongoing maintenance and management of Peninsula Watershed facilities and lands. These activities both decrease the naturalistic character of the project area and increase opportunities for expansive views. Current watershed management and maintenance periodically requires the presence of maintenance vehicles, equipment, and materials along with earth movement and vegetation management. For example, the SFPUC mows and maintains (i.e., grades and/or patches) watershed roads, including portions of the Fifield-Cahill ridge trail, every two to five years. In addition, SFPUC staff manages wildfire risk by reducing fuel loads and maintaining fuel breaks of up to 50 feet wide throughout the watershed, including along the proposed southern skyline ridge trail alignment and along Fifield Ridge, north of Five Points. This work involves tree felling and vegetation clearing, as needed, typically on four-year intervals. As described more fully in Section 4.8, Biological Resources, plant pathogens in the watershed— including sudden oak death (*Phytophthora ramorum*)—have decimated stands of coast live oak and tanoak within portions of the project area. In the course of, and in addition to, regular fuel maintenance activities, SFPUC staff has worked to slow the spread of sudden oak death and minimize the risk to public health and safety by removing hundreds of infected trees, among other measures.

While this information is relevant to the topic addressed in Section 4.4, Transportation and Circulation, its inclusion in that section’s the environmental setting discussion would not alter the analysis or conclusions in the EIR. Regardless, in response to the commenter’s request, and for informational purposes only, the following text is added to EIR Section 4.4.1.1, Road Network (p. 4.4-2), after the first paragraph in that

subsection, to describe existing SFPUC traffic and maintenance activities along watershed roads in the project area:

The volumes reported above capture all types of vehicle traffic, including visitors to the project area, regional travel, and trucks related to watershed maintenance and operations activities, among others. Current traffic on watershed service roads in the project area includes SFPUC and vendor vehicles for watershed lands and facilities operations, and periodically requires use by earth movement and vegetation management vehicles and equipment. For example, the SFPUC mows and maintains (i.e., grades and/or patches) watershed roads, including portions of the Fifield-Cahill ridge trail, every two to five years. In addition, SFPUC staff manages wildfire risk by reducing fuel loads and maintaining fuel breaks of up to 50 feet wide throughout the watershed, including along the proposed southern skyline ridge trail alignment and along Fifield Ridge, north of Five Points. This work involves tree felling and vegetation clearing, as needed, typically on four-year intervals. SFPUC staff drive on the Fifield-Cahill ridge trail between Cemetery Gate and Five Points approximately 3 to 5 times per day, and between Five Points and Portola Gate (at Sweeney Ridge) approximately 1 to 3 times per day. Watershed visitor traffic also includes vehicles for the approximately 10 to 20 visitors (i.e., hikers, bicyclists, and equestrians) who use the trail under the existing docent program, up to three days per week. However, watershed recreational visitors typically do not drive on interior watershed roads (i.e., Fifield and Cahill service roads).

For responses regarding the project's construction and operational impacts, please refer to Comment TR-2 and TR-3, respectively.

One commenter raises concern that data from Purisima Creek Redwoods Open Space Preserve that was used to evaluate visitor projections for the proposed project was collected prior to the onset of the COVID-19 pandemic. As described above, the Notice of Preparation (NOP) for the EIR for the proposed project was issued on December 21, 2016. Shortly thereafter, the technical analysis was conducted to inform the discussion and conclusions presented in the EIR. The technical analysis is representative of existing conditions at the time the NOP was issued, which is what is required under CEQA Guidelines section 15125(a)(1). While the commenter asserts that the COVID-19 pandemic may have resulted in an increase in visitors to Purisima Creek Redwoods Open Space Preserve and other recreational facilities throughout the region, the EIR is not required to assess such a change. Further, any changes to visitor activity due to the COVID-19 pandemic are not anticipated to be representative of conditions at the time this project is completed, which is currently anticipated to be summer of 2023. Please refer to response to Comment GC-6 – Non-specific, Lists Multiple Issues, for additional detail regarding the use of recreational lands during the COVID-19 pandemic.

Comment TR-2: Construction Impacts - Traffic Circulation and Parking

This response addresses the following comments, which are quoted below:

A-Caltrans.1, A-Caltrans.3

“For Figure 2-3b on page 95, construction access should not be placed on curves where sight distance is limited, especially if large trucks are accessing these areas.” (Mark Leong, Caltrans, Email, July 30, 2020)

“For the Construction Impacts section on page 196, the construction truck traffic should be limited to the non-commute weekday peak period 9am-3pm as much as possible to reduce the traffic impacts to SR-35, SR-92 and I-280.” (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

RESPONSE TR-2

The commenter seeks further clarification regarding the proposed project’s construction activities and includes a suggestion for reducing construction-related impacts.

The draft EIR discusses the potential impact of project-generated construction vehicle trips on transportation and circulation conditions on study area roadways on pages 4.4-9 through 4.4-13. As described therein, the construction worker and truck trips shown in Table 2-1, Summary of Construction Requirements for the Project, were used to determine the maximum number of vehicle trips to be evaluated for Impact TR-1. Regarding the request for restrictions on construction truck traffic to avoid peak hour traffic on Caltrans facilities near the project site, the EIR acknowledges Standard Construction Measures that included scheduling construction truck trips during non-peak hours. Specifically, draft EIR page 4.4-11 states that:

“The SFPUC would require its Standard Construction Measures (traffic control measures) be included in the construction specifications to maintain transportation and circulation on roadways affected by construction. These requirements include measures such as flaggers, construction warning signs, scheduling truck trips during non-peak hours, and coordinating with local emergency responder to maintain emergency access.”

Non-peak hours would be defined based on site-specific traffic conditions at the time construction activities are anticipated to commence, and would be defined in the Caltrans-approved transportation management plan, which is an application requirement for a Caltrans encroachment permit. The transportation management plan requirement for construction activities that would occur within the public right-of-way along S.R. 35 and S.R. 92 is described on page 4.4-11 of the draft EIR. For informational purposes, 24-hour traffic counts collected in May 2017 indicated that the peak hours of traffic on S.R. 92 were between 7 a.m. and 8 a.m. and between 4 p.m. and 5 p.m. on weekdays and between 11 a.m. and 12 p.m. on weekends.¹

Regarding the location of construction access on/near curves, the EIR also acknowledges work within the Caltrans right-of-way would be subject to Caltrans review and approval. The draft EIR states on pages 2-21 and 4.4-11 that:

“...portions of the southern skyline ridge trail parking lot, access drives, and trail would be constructed within the Caltrans right-of-way along S.R. 35. In addition, some of the staging areas would also require temporary use of the Caltrans right-of-way. As a result, the SFPUC would need to obtain an encroachment permit from Caltrans for the construction and operation of the southern skyline ridge trail.

¹ CHS Consulting Group, *State Route 92 and State Route 35 Ridge Trail Crossing Alternatives Technical Report*, July 2017.

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“Any activities taking place during the week or weekend within the public right-of-way along S.R. 35 and S.R. 92 or requiring temporary traffic controls such as lane closures would be coordinated directly with Caltrans (through preparation of a Caltrans-approved transportation management plan as part of an application for an encroachment permit) to ensure traffic safety and minimize disruptions to traffic, transit, bicycle, or pedestrian access or circulation along these facilities.”

While the EIR acknowledges that temporary construction activities in the Caltrans right-of-way would be subject to Caltrans review to ensure traffic safety and minimize disruptions, the text on draft EIR page 4.4-11 (second paragraph) is revised to address the issue raised in the comment, as follows:

Construction activities would generally take place within SFPUC right-of-way (i.e., outside of the public right-of-way along S.R. 35 and S.R. 92) and would not substantially conflict with traffic, transit, bicycle, or pedestrian access or circulation along these facilities. ~~Newly constructed service roads connecting to S.R. 35 would be sited to provide adequate sight distance for heavy vehicles to safely enter and exit the construction site.~~ The use of a crane to install the prefabricated pedestrian bridge proposed for seasonal drainage crossing along southern skyline ridge trail would require intermittent closure of the northbound lane of S.R. 35 for up to three days for site preparation, bridge delivery, crane setup, bridge placement, and site cleanup and materials removal. The access drives would provide construction and maintenance access connections between S.R. 35 and the trail alignment. Their approximate locations, shown in Figures 2-3a through 2-3e, were selected with consideration for safety and trail accessibility (e.g., distance, favorable topography, minimal vegetation). Any activities taking place during the week or weekend within the public right-of-way along S.R. 35 and S.R. 92, including construction and operation of access drives, or requiring temporary traffic controls such as lane closures would be coordinated directly with Caltrans (through preparation of a Caltrans-approved transportation management plan as part of an application for an encroachment permit) to ensure traffic safety and minimize disruptions to traffic, transit, bicycle, or pedestrian access or circulation along these facilities.

Comment TR-3: Operational Impacts - Traffic Circulation and Parking

This response addresses the following comments, which are quoted below:

O-BARTC-2.3, O-GreenFoothills.4, I-Haxton.2, I-Hyer.2, I-Kromat.2, I-Molitor-1.4, I-Molitor-2.5, I-Molitor-3.4, I-Oldendorp.2, I-Ruby_J.2, I-Ruby_J.5, I-Turri.2

“Additionally, from the Ridge Trail's perspective, we do not support the draft EIR's finding that the unresolved Highway 92 crossing should be considered a significant unavoidable impact related to transportation and circulation. This type of gap is not unique to the region. Specifically, we have 16 planned Caltrans crossings, and we believe the construction of the staging area and installation of simple signs would mitigate this impact.” (Liz Westbrook, Bay Area Ridge Trail Council, Planning Commission, Hearing Comments, July 23, 2020)

“We believe that Impact TR-5, regarding the potential for increased risks of conflicts between vehicles and trail users attempting to cross Highway 92, where no marked or signalized crossing exists, can be mitigated to a less than significant level through (1) design of the proposed staging area and parking lot that orients visitors to the Ridge Trail leading south, including signage such as “Ridge Trail South begins here”, and (2) signage noting hazards to hikers, bikers, and equestrians at the north end of the staging area/parking lot, (3) other materials including trail guides, maps and advisories at the staging area kiosk, and (4) the Permit that trail users will need to obtain.” Lennie Roberts, Green Foothills, Letter via Email, August 10, 2020)

“I also find the concerns about conflict between vehicles and pedestrians to be unfounded. If there are funds to prepare a 557-page EIR, perhaps we could scrounge up some funds to install a crosswalk or traffic light? There are lots of people who would love to use these public lands, and it seems quite paternalistic to say they can't use them because you don't think they know how to safely cross a street.” (Tom Haxton, Letter via Email, June 25, 2020)

“...as residents on Skyline Blvd, quite near the Purissima Trailhead, we see the number of visitors to the area, and have concerns about traffic at the junction of 92 and 35 and about visitors wanting to cross 92.” (Jeanette Hyer and Arturo Alvarez, Letter via Email, August 11, 2020)

“A large parking lot near this area would also make matters worse in my opinion. There is already a huge problem of overflow parking at the purissima open space parking lot. People are parking on skyline, blocking people’s driveways and reducing visibility for people who are trying to get out of their driveways. There has been an attempt to police the area, but there is not enough personnel to make a difference.” (Heidi Kromat, Letter via Email, July 22, 2020)

“4. There is no mention in the DEIR of how to mitigate unauthorized parking from forming at convenient access points, which will obviously be formed around the proposed maintenance lots and service driveways. My home sits directly across from where a bathroom and maintenance road have been proposed. That pullout is already used by overflow parking from the Purisima Trailhead so I feel this new access will draw even more people to park along both sides of the road here. I believe this impact will occur at many of the access roads and the DEIR does not make mention of this at all (that I could find).

5. The current southern end of the proposed Skyline Trail simply ends at the Phleger property line. The official recommendation is to have visitors simply turn around and walk back to the parking lot at 92 and does not address the likelihood of unauthorized access at this terminus, which happens to be near several other trails. These unauthorized access points are very close to several residential homes, one of which is actually captured in a photograph within the DEIR. The closest parking lot at this time is the Purisima Trailhead parking lot, which is already well above capacity on any given weekend.

If this trail were to move forward I submit that there should, at the very least, be a large parking lot installed on the other side of Highway 35 (Skyline) just south of the current parking lot. The DEIR currently does not address parking at this end of the trail in any manner.

Please take these concerns seriously. With the pandemic forcing so many businesses and beaches to shut down or reduce access, mountain trails have exploded in popularity. Unfortunately, the support infrastructure has not, meaning that many existing parking lots simply lack the capacity to handle the crowds, forcing many visitors to find any sliver of parking that they can. I have seen people come to a

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complete stop in order to parallel park along the roadway, nearly resulting in several accidents. People are not following the recommendations on the signs that say if the lot is full then the trails are full. They simply don't drive this far only to turn around or go somewhere else, so they are more than happy to park over a mile away from a trail access point.” (Jerry Molitor, Letter via Email, August 24, 2020)

“If you ever have a doubt as to what the impact to the neighborhood around a trail can be, take a look at the junction of Higgins Canyon Rd and Purisima Creek Rd around the Higgins Road trailhead down the hill at the bottom of the Purisima Creek trail. It is a major bottleneck and very difficult to navigate safely. The overcrowding and unsafe conditions are the exact opposite of what residents and visitors want.” (Jerry Molitor, Letter via Email, June 25, 2020)

“Lastly, there's no mention in the DEIR of how to mitigate unauthorized parking forming at any of the convening access points” (Jerry Molitor, Planning Commission, Hearing Comments, July 23, 2020)

“If there is no access off 35 to this end of the trail I assure you visitors will make their own parking and access. Security fences will not stop access. Recently with the increased visitation to purissima open space visitors have parked everywhere and anywhere including private property. I've sent many emails to the open space and the sherif in regards to visitors parking violations and walking on highway 35 which is very dangerous. I don't see anywhere in the reports about pedestrians safety and parking in regards to merely parking along 35 which will happen. Just come up on a sunny weekend and you'll find over 100 cars along the road.” (Jason Oldendorp, Letter via Email, June 26, 2020)

“1. PARKING - Safe Entrance & Exit.

Where do you intend to have parking for all these people? Will you create new parking lots with easy access prior to opening up this trail ? There is no realistic discussion of how and where all the cars will be parked for accessing this Watershed trail. How will you with deal with people parking anywhere along Skyline and entering the trail other than designated trail heads (people will try and succeed in going over or under any fences) ? Just to give you a visual of what will happen, checkout the parking situation along Skyline (especially around the Mid-Pen Open Space parks at North and South Skyline) any weekend and you will see the result of not enough parking even for the existing parks. Add in the Watershed trail and it will create an even larger, dangerous situation for hikers, bikers and community members. People unfamiliar with Highway 35/Skyline Speedway open car doors and walk down Skyline oblivious to the heavy and frequently speeding traffic (posted at 50 but more often people drive far faster on this road). The serious number of people making U-turns over double-yellows in blind spots in this area are frightening and unbelievable and there have been many accidents that have occurred due to unsafe driving on Skyline. Plus people become extremely distracted trying to locate any spot they can to park their cars. Quite a scary situation and it will only get worse adding in additional trail heads next to Skyline. There is also a negative impact on Skyline and our side streets when visitors park and leave their garbage such as masks, cigarette butts, water bottles, food wrappers, toilet paper, kleenex, food wrappers, etc. We've seen it all increase dramatically recently. Plus there is total disregard for No Parking signs put up by Mid-Pen and Cal Trans in unsafe areas to park. These signs need to be permanent 'No Parking' signs on Skyline where parking is dangerous to prevent visitors throwing the 'No Parking' sandwich boards' over the sides as we have witnessed.” (Jan Adair Ruby, Letter via Email, August 10, 2020)

“I do hope you give all the suggestions from Kings Mountain Community members and many others serious consideration. The impact of opening this upper part of the Watershed to the south will have a huge, negative impact for many reasons as I have indicated. The increased traffic will seriously impact the safety of cyclists, community members and the general public and we are all at greater risk if this project moves forward.” (Jan Adair Ruby, Letter via Email, August 10, 2020)

“Adding another trail/parking lot would increase the traffic in an already crowded area.” (Jean Turri, Letter via Email, August 9, 2020)

RESPONSE TR-3

Several commenters opine on the impact determination regarding the potential for an increase in conflicts between bicyclists, pedestrians, and equestrians crossing S.R. 92 to connect between the southern skyline ridge trail and the terminus of an existing segment of the Bay Area Ridge Trail. Several commenters disagree with the conclusion that the project operations would increase the risk of conflicts and create potentially hazardous conditions between vehicles and pedestrians, bicyclists, and equestrians attempting to cross S.R. 92 and that this impact would be significant and unavoidable. Several commenters express concern about the increase in potential hazards as well traffic due to the increase in trail visitors.

M-TR-5 IMPACT DETERMINATION

As described in the draft EIR on pages 4.4-18 to 4.4-25, the planning department found that project operations would increase the risk of conflicts and could create potentially hazardous conditions between vehicles and pedestrians, bicyclist, or equestrian attempting to cross S.R. 92 and that this impact would be significant and unavoidable with mitigation. Accordingly, the planning department identified mitigation measures to reduce the impact. Both Mitigation Measures M-TR-5a and/or M-TB-5b would require work within Caltrans jurisdiction. Thus, implementation of the mitigation measures are beyond the SFPUC’s sole control and, therefore, there is uncertainty regarding the ability to implement the mitigation measures. Therefore, the planning department determines that there is a potential for a significant and unavoidable impact to occur with respect to bicycle, pedestrian, and equestrian safety hazards as a result of the proposed project. However, if the mitigation measures were to be approved by Caltrans and implemented, the impact would be less than significant. Pursuant to the requirements of M-TR-5a and M-TR-5b, the SFPUC would work with Caltrans regarding the installation of signage (M-TR-5a) and installation of a designated pedestrian, bicycle, and equestrian crossing of S.R. 92 (M-TR-5b). For further discussion of the proposed mitigation measures, please refer to Comment TR-4.

The EIR’s determination of a significant and unavoidable impact with mitigation considers existing conditions, the characteristics of each proposed access program, and a preliminary evaluation of S.R. 92 crossing options conducted as part of the project by transportation engineering professionals. These elements qualify as “substantial evidence,” as defined by CEQA guidelines section 15126.4. It should be noted that the EIR’s impact determination is conservative, as the planning department cannot be certain that these mitigation measures could be implemented because they require approval from another agency (i.e., Caltrans).

For informational purposes, please refer to Response PD-3 for a discussion of compliance and enforcement of watershed rules, including those related to security and informal access and trails.

POTENTIALLY HAZARDOUS CONDITIONS FOR VEHICLES

Several commenters express concern regarding existing conditions at the Purisima Creek Redwoods Open Space Preserve due to shoulder parking on S.R. 35 and opine that the same conditions would result from implementation of the proposed project near the proposed 20-vehicle parking lot. A review of publicly available accident data on S.R. 35 was conducted. This data was obtained from the University of California – Berkeley’s Transportation Injury Mapping System, which is based on collision data from the Statewide Integrated Traffic Records System.² The most recent five-year period of collision data currently available is 2015-2019, and during that period a total of 22 collisions occurred on S.R. 35 between S.R. 92 and Kings Mountain Road. This segment of S.R. 35 captures the main access points to the Purisima Creek Redwoods Open Space Preserve.

As shown in **Figure 11.4-1**, six of the 22 collisions involved a parked vehicle, and only one of those occurred at a location near a trail entrance, approximately 1,200 feet to the south of the entrance to the north parking lot. In addition, one of the 22 collisions involved a vehicle making a U-turn near the entrance to the south parking lot.

The commenters’ observations about unsafe conditions on S.R. 35 caused by parked vehicles on S.R. 35 and vehicles making U-turns near the Purisima Creek Redwoods Open Space Preserve are noted. However, the commenters’ observations and the five-year collision data does not change the draft EIR conclusions for the following reasons.

As discussed on pages 4.4-14 through 4.4-19, operation of the project under any of the access programs analyzed for the Fifield-Cahill and southern skyline ridge trails would not substantially increase the current traffic volumes on area roadways and would not result in an appreciable increase in hazards beyond levels that currently exist for vehicles. The proposed project is estimated to generate a maximum of between 115 and 190 new daily vehicle trips, which would not be substantial in relation to the existing traffic volumes on study area roadways, as discussed on page 4.4-19 of the draft EIR. Furthermore, those vehicle trips would be spread across the hours that the trails are open and across multiple parking facilities, thereby lessening the effect on study area roadways. The effect of additional vehicles making left turns from S.R. 92 to access the two proposed parking areas in the vicinity of Cemetery Gate, and vehicles making left turns from southbound S.R. 35 into the proposed 20-vehicle parking lot, is discussed on pp. 4.4-18 and 4.4-19 of the draft EIR. Regarding the additional vehicle traffic, the EIR concludes that operation of the proposed access program and variants would result in a less-than-significant impact related to hazardous vehicle conditions:

The turning movements described above would occur more often on weekends than on weekdays, and more often under variant 2 than under the other access programs. The project would result in a maximum of between 115 and 190 new daily one-way vehicle trips, depending on the maximum visitation levels permitted under the proposed access program and variants (see discussion above for Impact TR-4). Those vehicle trips would be spread over an eight-hour period when trail access is open, and they would be spread among parking facilities accessed from two different roadway facilities (i.e., S.R. 92 and S.R. 35). Considering the temporal and geographic dispersion of these vehicle trips and the limited number of vehicles attempting to make turns into the proposed parking areas, this analysis does not expect left-turning vehicles to experience uncharacteristic queuing or delays. The addition of these left-turning vehicles would not result in an appreciable increase in safety hazards beyond levels that currently exist for vehicles making these left turns.

² UC Berkeley, 2020. Transportation Injury Mapping System. Collision Diagram for S.R. 35 between S.R. 92 and Kings Mountain Road, created February 1, 2021. Available at: <https://tims.berkeley.edu/>.

Primary Street:
S.R. 35

Secondary Street:
S.R. 92 to Kings Mountain Rd

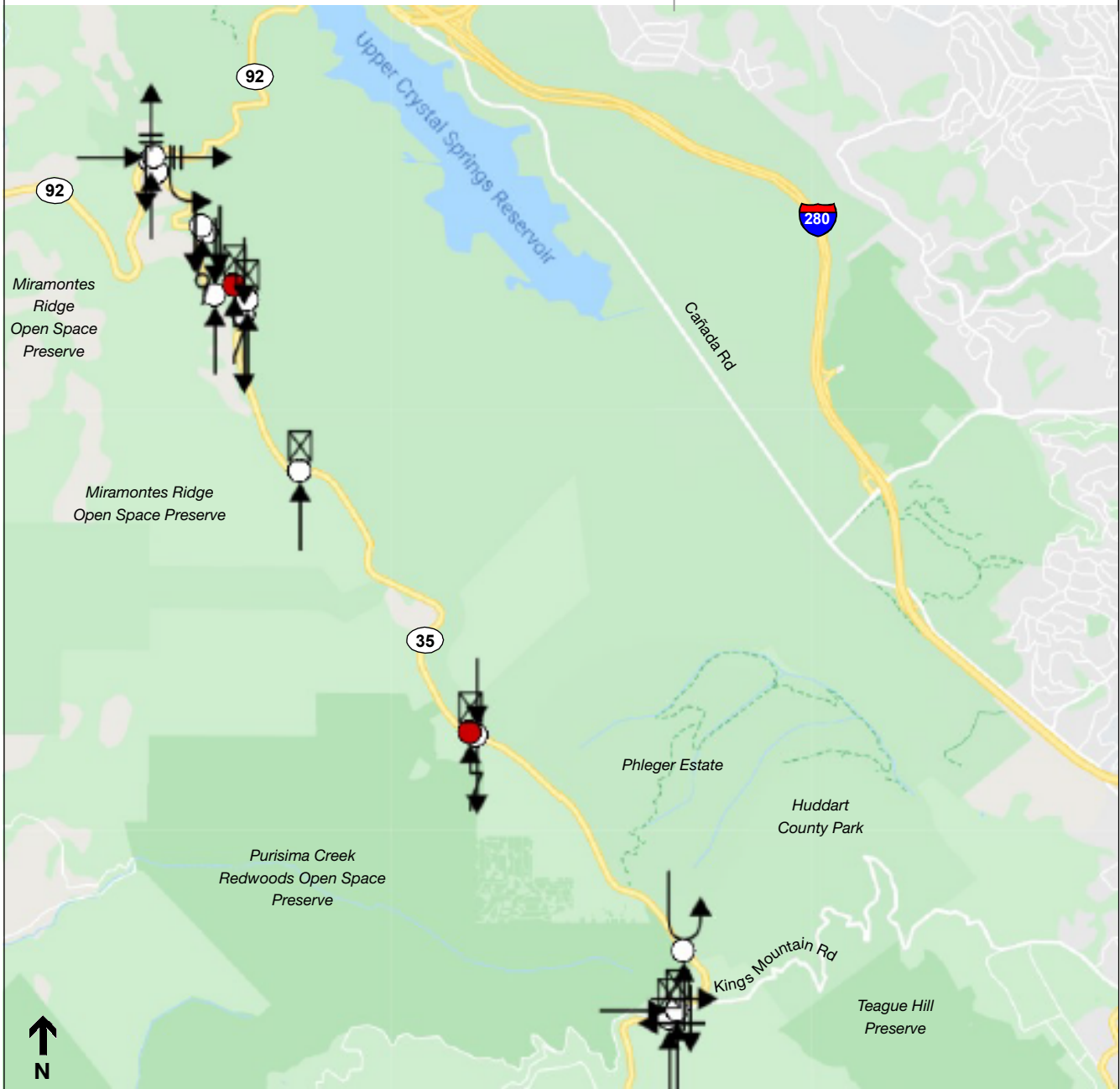
Time Period:
01/01/2015 to 12/31/2019

Agency Name:

Mapping Summary:

Fatal Collision	2
Injury Collision	15
Mapped	17
Not Drawn	5
Total	22

- | | |
|----------------|----------------|
| → Straight | 🚶 Pedestrian |
| ↶ Left Turn | 🚲 Bicycle |
| ↷ Right Turn | ☒ Object |
| ↺ U-Turn | ● Fatal Crash |
| ↻ Overturned | ○ Injury Crash |
| ↘ Ran Off Road | |
| ⊞ Stopped | |
| ☒ Parked | |



SOURCE: UC Berkeley, 2020

Southern Skyline Boulevard Ridge Trail Extension

Figure 11.4-1

Collisions on S.R. 35 between S.R. 92 and Kings Mountain Road 2015-2019

11. Responses to Comments

11.4 Transportation and Circulation

Further, as described on page 1-4 of the draft EIR, the planning department has prepared this EIR to tier from the Peninsula Watershed Management Plan EIR (management plan EIR), which was certified in January 2001. The management plan EIR identifies the southern skyline ridge trail (the project) as a potential future project, with the relevant program-level analysis provided on page III.J-3. The transportation project-level analysis for the opening of the Fifield-Cahill ridge trail begins on p. V-39.

The management plan EIR identifies potential hazards related to vehicular, bicycle, pedestrian, and equestrian safety and identifies mitigation measures related to signage and parking time limits, that would reduce the potential hazards to a less-than-significant level. The conclusions of the management plan EIR with respect to the southern skyline ridge trail and, more specifically with respect to the Fifield-Cahill ridge trail, are consistent with those conclusions reached in the EIR with one exception. The Peninsula Watershed Management Plan EIR identifies that, “unrestricted use of the Ridge Trail between the Portola Gate and SR 92 (near Skyline Boulevard) would generate an estimated 300 vehicle trips per day on weekends and about 100 daily vehicle trips on weekday” (p. V-39) whereas the Draft EIR estimates that a restricted access program would result in up to 115 new daily one-way vehicle trips and an unrestricted access program would result in up to 190 new daily one-way vehicle trips.

As previously mentioned, the Southern Skyline Boulevard Ridge Trail Extension Project EIR presents a project-level analysis that considers the effects of constructing and operating trails to the north and south of S.R. 92, based upon detailed project designs and project-specific technical studies, including a visitor use survey. In contrast, the Peninsula Watershed Management Plan EIR analyzes trail project concepts north and south of S.R. 92 at project (north) and program (south) levels, as part of a broader management plan for the watershed. Pursuant to CEQA Guidelines section 15152 (c):

Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

The project-level analysis conducted for the Southern Skyline Boulevard Ridge Trail Extension Project is based on a more refined project design than was analyzed in the Peninsula Watershed Management Plan EIR, provides a refined impact analysis and, pursuant to 15152 (c), does not identify any new significant impacts beyond those identified in the Watershed Management Plan EIR.

In addition, because this EIR evaluated a more refined project than what was originally envisioned in the management plan EIR, additional and more specific mitigation (described in detail below in the response to Comment TR-4: Transportation Mitigation Measures) is identified to address potentially hazardous conditions for bicyclists, pedestrians, and equestrians attempting to cross S.R. 92 or due to parked vehicles on the S.R. 35 shoulder near the proposed parking lot.

POTENTIALLY HAZARDOUS CONDITIONS FOR PEDESTRIANS, BICYCLISTS, AND EQUESTRIANS

With respect to bicycle, pedestrian, and equestrian safety, the EIR acknowledges on page 4.4-19 that new hazards may be introduced with implementation of the proposed project due to the possibility of shoulder parking on S.R. 35 or in the nearby 12-vehicle Caltrans vista point parking lot if parking demand were to exceed

the capacity of the proposed 20-vehicle parking lot, and the possibility of pedestrians, bicyclists, and/or equestrians attempting to cross S.R. 92 to connect between the southern skyline ridge trail and the terminus of an existing segment of the Bay Area Ridge Trail.

To address the potential hazards to bicyclists, pedestrians, and equestrians, the draft EIR states on page 4.14-19 that:

“The management plan EIR recognized this potential hazard and included Project-Level Mitigation Measures J.1 and J.4, which generally address this potential condition by imposing a parking time limit of two hours at the Caltrans vista point, and by coordinating with local jurisdictions regarding signage and enforcement of parking restrictions. Mitigation Measure M-TR-5a, Installation of Signage, would more specifically reduce the potentially hazardous condition created by parking overflow. However, implementation of this measure would not be entirely within the SFPUC’s control and require coordination with, and be contingent upon, agreement with Caltrans.”

Comment TR-4: Transportation Mitigation Measures

This response addresses the following comments, which are quoted below:

A-Caltrans.4, A-Caltrans.7, O-BARTC-1.3, I-Rix.2

“For the proposed mitigation discussed under the Impact TR-5 on page 209, please coordinate with Caltrans to determine the feasibility of the proposed mitigations. It could be considered as a feasible mitigation for the Impact TR-5 if the mitigation is analyzed to show that it could mitigate the impact without causing any other significant traffic operational concerns and is designed in accordance with Caltrans standards.” (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

“For the Mitigation Measure M-TR-5b on page 210, please analyze the feasibility of a dual roundabout at this location and how many lanes would be needed through the roundabout to address the potential impacts to vehicles on SR-92 and/or SR-35 to determine if this is a feasible mitigation.” (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

“Lead Agency

As the Lead Agency, the San Francisco Planning Department is responsible for all project mitigation, including any needed improvements to the STN. The project’s fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.” (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

“Though the Council avidly supports the project, there are two findings made in the DEIR with which the Council disagrees including (1) the findings for Impact TR-5; and (2) the ability of Alternative B to meet the project objectives as documented in Table 6-2: Summary of Ability of Alternatives to Meet Project

11. Responses to Comments

11.4 Transportation and Circulation

Objectives. First, the DEIR found that Impact TR-5, the potential for increased risk of conflicts from trail users attempting to cross State Route (S.R.) 92, would be a “significant and unavoidable” transportation impact. Building the proposed staging area will demarcate a clear end point for trail users. Furthermore, installing signs such as ‘Ridge Trail ends here’, documented in the DEIR as Mitigation Measure M-TR-5b, will also reduce the potential for traffic hazards. Inclusion of the mitigation strategies identified for the project, specifically M-TR-5b, should adequately reduce potential impacts to a less than significant level. Such measures are frequently and successfully employed on similar trails in the project vicinity and beyond. Additionally, a future connection of the trail across S.R. 92 is actively being prioritized by the Ridge Trail and other partners in the area.” (Janet McBride, Bay Area Ridge Trail Council, Letter via Email, August 7, 2020)

“I do feel that there are some challenging issues on the expansion of the trail, all to do with traffic and parking. It is impossible to envision the trail being put into place successfully without solving the congestion and traffic flow issues on Rte 92. It is definitely good for Kings Mountain residents to have parking further away from the overly-impacted Purisima parking lots, as they have been overfull even before the pandemic, so my concerns have more to do with safety and the 92 and 35 intersection itself.

I have read the EIR and can’t imagine two roundabouts not causing massive queues on the road, and am having a hard time imagining loaded trucks headed to the dump managing the roundabouts. And even on the 300 feet between the roundabouts there is no safety in a pedestrian crossing.

I don’t see any safe way for cars leaving the Fifield Cahill parking lot near Skylawn to make the left turn, eastbound, when leaving to return home with the intersection unchanged. Cars fly up over that hill on a routine basis.

The grade separation overpass seems like the only solution that will not only work for the trail extension, but also the current traffic situation for everyone. Rumor has it that the funding for that has evaporated. I hope that Caltrans can make this happen!” (Elisabeth Rix, Letter via Email, July 22, 2020)

RESPONSE TR-4

The topics represented in the comments concern the EIR mitigation measures proposed to address Impact TR-5. One commenter (A-Caltrans.4, A-Caltrans.7) requests that additional technical analysis be conducted to determine feasibility of mitigation measure M-TR-5b, one commenter (O-BARTC-1.3) disagrees with the impact conclusion for Impact TR-5 and opines on the adequacy of various mitigation measures, and one commenter (I-Rix.2) voices support for the bridge crossing concept.

As stated on page 4.4-20 of the draft EIR, the SFPUC and the San Francisco Planning Department consulted with Caltrans in the development of M-TR-5b (Construction of a Pedestrian/Bicycle/ Equestrian Bridge or Roundabout) to reduce the potentially significant traffic hazard impact.^{3,4} Caltrans reviewed and provided input on the bridge crossing, the roundabout concept, and other signalization concepts for mitigation put forward by the SFPUC and the San Francisco Planning Department. These proposals were based on the analysis conducted for this EIR as well as recent efforts undertaken by Caltrans and San Mateo County to

³ San Francisco Planning Department, 2017. Meeting Minutes for Southern Skyline Ridge Trail Project, Case No. 2016-016100ENV Project Coordination Meeting, July 27, 2017.

⁴ California Department of Transportation, 2017, Letter from Patricia Maurice (Caltrans) to Elizabeth White (San Francisco Planning Department), Subject: Southern Skyline Boulevard Ridge Trail Extension – State Route 92 and State Route 35 Ridge Trail Crossing Alternatives Technical Report. August 17, 2017.

address congestion and safety issues in the vicinity of the intersection of S.R. 92/S.R. 35, which are described on page 4.4-2 and 4.4-3 of the draft EIR.

The commenter requests that additional analysis be conducted to evaluate the feasibility of a dual roundabout at the S.R. 92/S.R. 35 intersection. As stated in the draft EIR on page 4.4-22, the San Francisco Planning Department commissioned a study of S.R. 92 crossing options which identified as potentially feasible a dual roundabout concept (Alternative 4) in which one roundabout is located at the S.R. 92/S.R. 35 intersection and another at the S.R. 92/Lifemark Road intersection. The study was completed by CHS Consulting Group in July 2017 and evaluated one lane roundabouts, which is consistent with the one-lane approaches on S.R. 92, S.R. 35, and Lifemark Road.⁵ A conceptual design for two-lane roundabouts was not evaluated as part of the study.

The EIR acknowledges that the crossing options are based on preliminary evaluations conducted to date and are conceptual, meaning that specific design elements may change. However, as stated on page 4.4-23 of the draft EIR, Mitigation Measure M-TR-5b requires that:

“The SFPUC shall work with Caltrans to formulate and execute an agreement on the design, funding, and construction of either a grade-separated crossing or roundabout to reduce potentially hazardous conditions for trail user access across S.R. 92 near its intersections with S.R. 35 and Lifemark Road.”

As part of this requirement, the conceptual designs prepared to support the conclusions in this EIR would be further developed by the SFPUC and Caltrans if the roundabouts are selected for implementation. CEQA guidelines section 15126.4 identifies that:

“The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type (s) of potential actions(s) that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure.”

The mitigation measure identifies specific performance standards that will be achieved by the mitigation (i.e., the construction of a pedestrian bridge or roundabout that would reduce the potentially significant traffic hazard impact), and identifies the steps to achieve the performance standard such as the execution of an agreement regarding the design, funding, SFPUC’s fair share payment, and construction. As identified in the draft EIR on page 4.4-25:

“Should Caltrans agree to undertake a pedestrian bridge crossing or roundabout project at this location, such project would be subject to a separate CEQA process that would fully analyze and disclose the environmental impacts of the measures. CEQA does not require this project to speculate regarding the impacts of potential future roadway improvements that would be under the jurisdiction of Caltrans and beyond SFPUC’s control. In addition, there is insufficient information on the mitigation measures’ design, schedule, and funding to analyze these measures further.”

⁵ CHS Consulting Group, *State Route 92 and State Route 35 Ridge Trail Crossing Alternatives Technical Report*, July 2017.

11. Responses to Comments

11.4 Transportation and Circulation

Therefore, the analysis conducted for the EIR is adequate for the purposes of developing feasible mitigation measures, and additional analysis is not necessary to support the impact conclusions.

The commenter also opines on the roles, responsibilities, and required elements of the proposed M-TR-5b mitigation measure. As previously described, details related to funding, specifically SFPUC's fair-share contribution, scheduling, and specific design/construction parameters cannot be provided at this time. These details depend on future decisions made by Caltrans, San Mateo County, and other interested parties in developing and approving comprehensive traffic safety improvements for this area, and would be developed as part of an agreement to be executed by SFPUC and Caltrans. With respect to the proposed project's fair-share contribution, the EIR recognizes that SFPUC's financial contribution in the agreement would be roughly proportional to the project's impact. Additionally, the draft EIR states on page 4.4-24 that:

“The selected crossing option (i.e., bridge or roundabout) shall be constructed prior to opening the Fifield-Cahill ridge trail to unsupervised public access (if southern skyline ridge trail is constructed) and prior to opening the southern skyline ridge trail to unsupervised public access.”

SFPUC would continue to engage with Caltrans and San Mateo County to develop comprehensive traffic safety improvements for the area surrounding the intersection of S.R. 92 and S.R. 35. As discussed above and on pages 4.4-2 and 4.4-3 of the draft EIR, San Mateo County and Caltrans are engaged in public planning processes to address the extensive congestion and traffic safety issues in the project area. These efforts include the development of Connect the Coastside, which is San Mateo County's Comprehensive Transportation Management Plan for the County's Midcoast area. SFPUC will continue to participate in these processes, and will work with its partner agencies, as appropriate, to design, plan, fund, and construct needed transportation improvements. Because these other agencies will develop and decide whether to implement any traffic safety improvements in this area, there is insufficient information on the grade-separated crossing or roundabout design, schedule, and funding to provide any additional detail at this time.

The commenter disagrees with the EIR's conclusion that M-TR-5a – Installation of Signage (mistakenly referred to as M-TR-5b in the comment) would not, on its own, reduce impacts identified for Impact TR-5 to a less-than-significant level. The planning department's determination is supported by substantial evidence. On p. 4.4-20, the draft EIR explains:

“Implementation of Mitigation Measure M-TR-5a would reduce this impact to some degree by notifying visitors that crossing S.R. 92 is prohibited and dangerous. However, signage alone might not discourage all potential S.R. 92 crossings by trail users. As a result, this measure would not be sufficient on its own to reduce the above-described potentially hazardous conditions related to trail users crossing S.R. 92 under the proposed access program and variants 2 and 3 to less-than-significant levels.”

Please refer to the response to Comment TR-3: Operational Impacts – Traffic Circulation and Parking, subsection *M-TR-5 Impact Determination*, for the rationale as to the planning department's conservative impact determination of significant and unavoidable with mitigation.

Comment TR-5: Permits/Approvals

This response addresses the following comments, which are quoted below:

A-Caltrans.6, A-Caltrans.8

“Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>. (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

“Prior to construction, coordination is required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).” (Mark Leong, California Department of Transportation, Letter via Email, July 30, 2020)

RESPONSE TR-5

The comments state the need for a Caltrans permit for movement of oversized or excessive load vehicle on state roadways and coordination with Caltrans in the development of a TMP for any work conducted within or adjacent to the State ROW. The SFPUC’s obligation to comply with applicable Caltrans requirement for oversized or excessive load vehicles on state roadways as well as an encroachment permit for any construction-related activities identified in Section 2.8 Project Approvals on page 2-36.

Regarding the comment for coordination on a transportation management plan, page 4.4-4 of the draft EIR explains:

“...Caltrans and local jurisdictions require issuance of encroachment permits, as well as preparation of transportation management plans/traffic control plans, when work during project construction would occur within the right-of-way of state and/or local roadways.”

Furthermore, the EIR discusses the potential impact of project-generated construction vehicle trips on transportation and circulation conditions on study area roadways on pages 4.4-9 through 4.4-13. Regarding Caltrans permitting/approval requirements, the draft EIR states on page 4.4-11 that:

“Any activities taking place during the week or weekend within the public right-of-way along S.R. 35 and S.R. 92 or requiring temporary traffic controls such as lane closures would be coordinated directly with Caltrans (through preparation of a Caltrans-approved transportation management plan as part of an application for an encroachment permit) to ensure traffic safety and minimize disruptions to traffic, transit, bicycle, or pedestrian access or circulation along these facilities.”

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11.5 Noise

The comment and corresponding response in this section covers the subject included in draft EIR Section 4.5, Noise and Vibration. The comment topic relates to:

- NO-1: Noise Setting

Comment NO-1: Noise Setting

This response addresses the following comment, which is quoted below:

I-German.9

"We noticed that sound checks were taken in regards to construction noise (Section 4.5). The sound checks of the regular road noise struck us as woefully inadequate (Table 4.5-2) being taken four years ago on a late Tuesday and Thursday afternoon. It probably captured the residents coming home from work and not the delivery, dump, garbage and big rig trucks. This survey needs to be updated to include weekend morning (and now more frequent) vehicle club activities and the seasonal logging trucks. The sound is quite disruptive to a serene and contemplative hike and is always present, startling and oppressive." (Carrie German, Email, July 23, 2020)

RESPONSE NO-1

Under CEQA, an EIR is required to evaluate the effects of a project on the environment. Within the context of CEQA, effects do not include impacts that are not caused by the project (CEQA Guidelines Section 15358). The EIR's Section 4.5, Noise and Vibration, evaluates potential project effects on noise-sensitive receptors relative to baseline conditions; it does not evaluate the effects of existing noise on potential future project users.

Sensitive receptors are identified on page 4.5-1 (footnote 2) as generally including hospitals, nursing homes, senior citizen centers, schools, churches, libraries, and residences, as identified by the State of California General Plan Guidelines.¹ The draft EIR also considers the Skylawn Memorial Park as a noise-sensitive receptor, because it meets the San Mateo County General Plan's definition of a "quiet area," meaning it is perceived as having a low ambient noise level (p. 4.5-7). Recreationists are generally not considered sensitive receptors, as they tend not to be stationary and generally have a higher tolerance for noise than the types of sensitive receptors identified.

Baseline conditions include the presence of existing noise-sensitive receptors and the existing ambient noise levels. Thus, the primary purpose of the noise monitoring at existing receptor locations is to establish the existing background condition at identified sensitive land uses for the purposes of comparing the increase in noise levels that would result from project activities.

¹ Governor's Office of Planning and Research, State of California General Plan Guidelines, p. 136, 2017. Available online at: https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf, accessed March 10, 2021.

11. Responses to Comments

11.5 Noise

As stated on page 4.5-10 of the draft EIR: “To address the CEQA significance criterion regarding ‘substantial temporary or periodic noise increases in ambient noise levels’ for construction noise, the San Francisco Planning Department considers an increase of 10 dBA over existing noise levels from persistent construction to be a substantial temporary increase in noise levels for residential land uses.”

Therefore, as a conservative approach to analysis, noise monitoring was performed during the mid-afternoon, prior to the p.m. peak hour commute during which vehicle-related noise tends to increase.² By collecting noise data during quieter periods (i.e., prior to the peak commute hour), the analysis estimates a larger increase in noise levels than if data were collected during noisier periods. That is, if the noise measurements were collected during periods of greater noise, the estimated increase in noise due to project construction would be lower.

² With the exception of monitoring at Skylawn Memorial Park, within a location distant from areas of roadway noise, whose noise was measured during the 5 p.m. hour.

11.6 Biological Resources

The comments and corresponding responses in this section cover the subjects included in draft EIR Section 4.8, Biological Resources. The comment topics related to:

- BI-1: Special-status Plants
- BI-2: Special-status Wildlife
- BI-3: Non-native/Invasive Species
- BI-4: Wildlife Movement and Migration
- BI-5: General Wildlife and Habitat

Comment BI-1: Special-status Plants

This response addresses the following comments, which are quoted below:

A-CDFW.2, I-Brousseau-6.1

“COMMENT 2: State-listed Plants.

Issue: San Mateo woolly sunflower (*Eriophyllum latilobum*), a state endangered species, has been documented to occur in the vicinity of the Project area. Without appropriate mitigation measures, Project activities conducted within San Mateo woolly sunflower habitat have the potential to significantly impact San Mateo woolly sunflower.

The draft EIR, Mitigation Measures M-BI-1a and M-BI-1c states that if the Project cannot avoid take of special-status plant species, the proposed Project will translocate or salvage rare or endangered plants as recommended by a qualified biologist, and CDFW will be notified at least 10 days prior to disturbance.

Take of state-listed or state Rare plant species, requires acquisition of an Incidental Take Permit (ITP) from CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq to comply with CESA and/or the Native Plant Protection Act. Additional mitigation may be required pursuant to such a permit.

Recommendation: State-listed Plant Take Authorization: CDFW recommends that the Project proponent (SFPUC) obtain an ITP from CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq. if the Project has the potential for take of state-listed or state rare plant species.

CDFW recommends early consultation when obtaining an ITP as mitigation ratios, protective measures, etc. must be developed. Information on how to obtain a ITP is found on CDFW’s Incidental Take Permits webpage: <https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>.” (Gregg Erickson, California Department of Fish and Wildlife, Letter via Email, August 6, 2020)

“I request that the EIR be amended to correctly address the issue of soil compaction along the Fifield-Cahill Ridge Road - and to fairly compare the current amount of soil compaction on the road that has already happened as a result of decades of SFPUC patrol and operations vehicle traffic - with the potential additional amount of compaction that may result on this road as a result of additional unsupervised visitors.

In reality - the area under discussion is a well travelled, highly-compacted gravel road, that is regularly driven on multiple times per day by heavy trucks operated by the SFPUC. In addition, this road is already

11. Responses to Comments

11.6 Biological Resources

mowed by the SFPUC, so the potential for vegetation damage is minimal. However, in its current form, the EIR gives the unfair impression that a few docents are taking small groups on a single track trail in the woods that is rarely used...and will compact the previously uncompacted soil - which just is not true -- the soil is already heavily compacted, and the additional impact of foot traffic on top of vehicle traffic would be negligible to both soil compaction and vegetation.

from page 283: "...As noted previously, the Fifield-Cahill ridge trail is subject to various uses and activities under existing conditions, including mowing, fuel management, road maintenance, watershed operations vehicle traffic, and pedestrian, bicycle, and equestrian trail use. Under existing conditions, the edges of the road and even the center of the road are well vegetated in some locations. Unsupervised access under variants 2 and 3 is expected to result in greater visitation than under existing conditions. As described in Chapter 2, Project Description, Section 2.5, Project Components, annual visitation is estimated to be up to 50,000 people under variants 2 and 3, as compared to about 870 people currently. Increased visitor traffic under access variants 2 and 3 could trample and crush existing vegetation, and/or compact the underlying soil, within maintained portions of the trail, thereby reducing the density of vegetation in these areas." (Christopher Brousseau, Email, August 9, 2020)

RESPONSE BI-1

With respect to potential effects on San Mateo woolly sunflower, EIR Appendix C states that "CNDDDB reports five occurrences of [San Mateo woolly sunflower], three of them on the Peninsula Watershed, near Pilarcitos Dam, along Sawyer Ridge Road, and San Mateo Creek canyon... Habitat resembling known populations is present along the Fifield-Cahill Ridge Trail." Thus, the EIR identifies the species as moderately likely to occur in the project area. As discussed in Impacts BI-1 and BI-5, significant impacts on special-status plants could occur during project construction and operations, and mitigation measures M-BI-1a, M-BI-1b, M-BI-1c, and M-BI-1d are identified as capable of reducing those impacts to less-than-significant levels. As represented in the mitigation measures referenced in comment A-CDFW.2, and draft EIR Chapter 2, Project Description, which identifies on page 2-36 the potential need for a California Endangered Species Act permit, the EIR acknowledges the potential need for such authorization for take of state-listed or state rare plant species.

However, as outlined in Mitigation Measure M-BI-1c, for special-status plants which could not be avoided during construction, the SFPUC would first be required to identify and avoid special-status plants, or undertake appropriate salvage and transplantation measures where special-status plants cannot be avoided. In response to comment A-CDFW.2, Mitigation Measure M-BI-1c on draft EIR pages 4.8-51 and 4.8-52 is revised to clarify the requirement to obtain a take permit in circumstances in which special-status plant species cannot be avoided, as follows:

If special-status plants are identified within the active work area and cannot be avoided, the revegetation plan shall include salvage and transplantation measures to seed or relocate affected plants to an appropriate nearby revegetation site. The qualified ecologist shall identify those plants for which translocation would likely be successful and feasible, and for each of those species the plan shall include a description of microhabitat conditions necessary for the species, salvage and transplantation procedures, seed collection and germination methods, an assessment of potential transplant and enhancement sites, performance criteria (e.g., less than 10 percent coverage by target invasive plants and comparable plant abundance, as deemed appropriate for the affected species), and a long-term monitoring program. If any state-listed or state rare plant species cannot be avoided, SFPUC shall obtain

an Incidental Take Permit from CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq. prior to any salvage operations, or if salvage and transplantation is not feasible.

Special-status plant mitigation areas shall be established at a ratio of 1:1 (impacted area to plantings) based on either the impacted area or the number of impacted individuals, as deemed appropriate by the qualified ecologist. Plants that can be feasibly relocated shall be transplanted into the revegetation site, typically adjacent suitable habitat that is unoccupied, to avoid making transplants into undisturbed occupied habitat and potentially spreading diseases. ~~If salvage and transplantation is not feasible, consistent with the requirements of the Native Plant Protection Act, the SFPUC shall notify the California Department of Fish and Wildlife at least 10 days prior to disturbance to allow for the salvage of rare or endangered native plants that would otherwise be destroyed.~~

Potential soil compaction effects are discussed under Section 4.8, Biological Resources, Impact BI-4 (p. 4.8-48):

However, it is also important to note that much of the potentially affected project area is already disturbed and/or regularly used by SFPUC staff and visitors. For example, SFPUC staff drive on the Fifield-Cahill ridge trail between Cemetery Gate and Five Points approximately 3 to 5 times per day, and between Five Points and Portola Gate (at Sweeney Ridge) approximately 1 to 3 times per day. In addition, approximately 10 to 20 visitors (i.e., hikers, bicyclists, and equestrians) use the trail under the existing docent program, up to three days per week.^{101,102} As discussed in Section 4.8.2.4, *Vegetation and Habitat Types*, the SFPUC annually mows watershed roads, including the Fifield-Cahill ridge trail, and maintains them (e.g., patching) every two to five years.

¹⁰¹ John Fournet, Community Liaison, SFPUC, Visitor and SFPUC use Fifield-Cahill ridge trail (file note), September 4, 2019.

¹⁰² San Francisco Public Utilities Commission, Annual Fifield-Cahill Ridge Trail Usage, August 23, 2003 Through December 31, 2017, 2017, Table: Number of Trail Participants/Docents by Event Type.

While the commenter correctly notes, and the EIR acknowledges, that some portions of the service road receive regular traffic, there are other portions that receive less traffic and do not consist of gravel road, as the commenter suggests. Rather, the Fifield-Cahill service road is primarily a dirt road. As shown in draft EIR Figure 4.2-2a (p. 4.2-3, Photo 2), in its northern portion the road has extensive plant growth in the median between the tire ruts.

The impact analysis presented in the EIR considers the potential increase in physical environmental effects of the project relative to existing, or baseline conditions. That is, the analysis factors existing conditions into its consideration of potential project effects. While the soil within the tire ruts is well compacted, and the southern portion of the road close to Cemetery Gate is composed of compacted dirt and gravel, the margins, and in some cases medians, of the Fifield-Cahill service road are not compacted, and currently host numerous species of native plants. For these reasons, the EIR analysis correctly identifies the potential for effects on selected areas where sensitive resources occur within and adjacent to the road.

Comment BI-2: Special-status Wildlife

This response addresses the following comments, which are quoted below:

A-CDFW.3, O-GGAudubon.7, I-Abbas.2, I-Bridgeman-1.1, I-Brousseau-2.2, I-Eberhardt.2, I-Fox.2, I-Haxton.1

“COMMENT 3: State Fully Protected Species – San Francisco Garter Snake.

Issue: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), a state fully protected species, is known to occur throughout the Project area. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code §§ 3511, 4700, 5050, and 5515. Take¹ of any fully protected species is prohibited. CDFW cannot authorize incidental take of fully protected species unless the take is for scientific purposes pursuant to Fish and Game Code Section 2081(a) or a project has an approved Natural Communities Conservation Plan pursuant to Fish and Game Code Section 2800.

Based on the current Project description and Mitigation Measures, the proposed Project cannot completely avoid impacts to San Francisco garter snake and has the potential to significantly impact the species.

Evidence impact would be significant: The Project has the potential to disturb, injure, or kill San Francisco garter snake during project construction, including use of heavy equipment. Exclusion fencing and/or funnels are not always fully effective for snakes, and can cause mortality or injury by capturing San Francisco garter snake within exclusion fencing and coverboards.

Recommended Potentially Feasible Mitigation Measure: CDFW recommends incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 1: San Francisco Garter Snake Full Avoidance. CDFW recommends that the Project completely avoid impacts to San Francisco garter snake by having a full-time biological monitor actively observe all vegetation removal and ground-disturbing activities. Vegetation removal should be done using hand tools. If work would occur in different portions of the alignment such that the biological monitor would not be able to fully monitor all activities, additional monitors may be needed.

COMMENT 4: Trail Usage.

Issue: The proposed Project would allow pedestrians, bicyclists, and equestrian usage on the trail and could impact the state fully protected San Francisco garter snake.

Evidence the impact would be significant: San Francisco garter snakes may utilize the trail for thermoregulation (basking) or move across trails during hunting and other movements. If bicyclists and equestrians do not observe San Francisco garter snakes on the trail, they have the potential to disturb, injure, and/or kill snakes. For example, a San Francisco garter snake was run over by a bicyclist and killed along a road on SFPUC property in area surrounding Crystal Springs and San Andreas Reservoirs in San Mateo County (U.S. Fish and Wildlife Service, 2006). Several additional cases of San Francisco garter snake mortality have been reported in the vicinity under similar circumstances. Snake mortality associated with bicycle and vehicle traffic is common on trails where such uses are allowed (Miller and Alvarez, 2016).

¹ Take is defined by Fish and Game Code § 86 as to “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.

Recommendation to minimize significant impacts: CDFW recommends that the trails be limited to pedestrian use to completely avoid take of San Francisco garter snake.

COMMENT 5: Mitigation Measure M-BI-2c – Avoidance and Minimization Measures for Dusky-footed Woodrat and American Badger.

Issue: The Project has a potential to significantly impact San Francisco dusky-footed woodrats.

Evidence the impact would be significant: Mitigation Measure M-BI-2c identifies that if San Francisco dusky-footed woodrat nests cannot be avoided, the nest will be dismantled. Depending on the number of San Francisco dusky-footed woodrat nests that are impacted by the Project, relocation of nests may be required to mitigate for impacts to San Francisco dusky-footed woodrats.

Recommended Potentially Feasible Mitigation Measure: CDFW recommends incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 2: San Francisco Dusky-footed Woodrat Nest Relocation: CDFW recommends that Mitigation Measure M-BI-2c include relocation of San Francisco dusky-footed woodrat nests if the Project requires the removal of more than 10 nests. CDFW encourages consultation with CDFW before San Francisco dusky-footed woodrat nests are removed or are impacted by the proposed Project.

COMMENT 6: Mitigation Measure M-BI-5a – Protection of Special-Status Wildlife during Operations.

Issue: Marbled murrelet is a state endangered species and has the potential to occur within the Project Area. Without appropriate avoidance and mitigation measures, Project activities include, but is not limited to, vegetation trimming, noise, tree removal, may significantly impact marbled murrelets.

Evidence the impact would be significant: Mitigation Measure M-BI-5a describes how marbled murrelets breeding surveys will be conducted; however, the draft EIR does not provide mitigation measures on how the project will avoid impacts to marbled murrelets if found.

Recommended Potentially Feasible Mitigation Measure: To avoid potential impacts to marbled murrelets, CDFW recommends incorporating the following mitigation measures into the Project's draft EIR, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 3: Marbled Murrelet Avoidance Period: To protect marbled murrelet young, CDFW recommends that Project activities that have the potential to impact marbled murrelet (i.e., activities in proximity to nesting areas) do not occur from March 15 – September 15.

Recommended Mitigation Measure 4: Marbled Murrelet Trash Abatement: To avoid attracting known predators of marbled murrelets, such as raved and jays, CDFW recommends that all food, organic scraps and garbage should be picked up daily and properly disposed of at an appropriate site.” (Gregg Erickson, California Department of Fish and Wildlife, Letter via Email, August 6, 2020)

“5. Listed species.

- Fully one third of the words Cactus species are at risk of extinction due to illegal harvest and trade from the wild (Beament, 2015). Other plant species are also increasingly at risk.
- Impacts from outdoor recreation and tourism are the fourth leading reason that species are listed by the federal government as threatened or endangered, behind threats from nonnative species, urban growth and agriculture. (Anderson, 2015; Solomon, 2015)
- The Wildlife Conservation Society found fivefold declines in detections of bobcats, coyotes and other midsize carnivores in protected areas in California that allowed quiet recreation activities like hiking, compared with protected areas that prohibited those activities. (Solomon, 2015)

11. Responses to Comments

11.6 Biological Resources

- Running, canoeing, cycling and similar activities negatively affected birds in nearly 90 percent of 69 studies that researchers reviewed in 2011. (Solomon, 2015)
- Informal illegal walking and biking trails traverse and damage areas intentionally protected from human activity, such as listed species habitat.”

(Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“A hike or bicycle ride on the trail has many beautiful views but does nothing harmful to any wildlife species, endangered or not. For instance, the EIR’s assertion that bicycles or equestrians will crush garter snakes or frogs just doesn’t line up with my many years of experience in these activities. Yes, a bicycle moves faster, but there’s still no real risk of killing animals, it just doesn’t work like that.

I also support the proposed new trail construction in this area, this would offer great benefit to the public. I understand the notion that it might have a negative impact on wildlife, but my impression is that the project would be fairly small-scale and not cause any significant harm.” (Alex Abbas, Email, July 24, 2020)

“I am a long time resident of the Bay Area when I was a child through my college years. I have lived back in the Bay Area since 1992. I am an equestrian and have been active with the San Mateo County Sheriff office as a volunteer with the Mounted Search and Rescue component, also San Mateo County Volunteer Horse Patrol.

A number of us had a key issued by the SFPUC and were able to ride on the old Stage Road from Edgewood to Hwy 92. I had a key for a number of years, and can't remember when we were told that they weren't issuing them anymore. We had to stay on the old Stage Road and didn't go down to the reservoir. Many of us via the news media were told about the whole watershed being open in the future. That is really sad as we stayed on the roads and could see if there were any issues. We were extra eyes for the rangers.

Most equestrians stay on the road and DON'T cut our own trails. The issue of people not being able to recreate in the Watershed doesn't make any sense. East Bay MUD has people using their property including cattle grazing. The frog and garter snake issue isn't a problem for MROSD with the Mindego Property and SMC Parks has Edgewood with its rare plant life and butterflies. There are numerous trail connections if the Watershed was Open. Why can't there be a trial period for pedestrians, bikes and equestrians to utilize the property.” (Carole Bridgeman, Email, August 9, 2020)

“In addition, page 283 mentions annual mowing of the road but does not describe the potential impact this has on endangered species, in contrast with the foot and bicycle traffic associated with unsupervised access. I request that the impact of mowing on endangered species be addressed with the same frequency and depth of discussion as the potential impacts due to pedestrian and bicycle access.” (Christopher Brousseau, Email, August 9, 2020)

“While we strongly support the protection of watersheds and endangered species, we cannot believe that hiking on existing roads poses any threat that could not be readily mitigated.” (Doug Eberhardt, Email, July 26, 2020)

“2) **Bicycles and snakes:** I agree the risk of bicycles to endangered snakes is logical and should be mitigated. Perhaps a solution is a lower quantity of permits given for biking than hiking permits, this would be logical.

3) **Bicycles and butterflies:** I question the science that blue butterflies would be damaged by bicycles. I would like to see more scientific quantification of this topic, it is important that we protect engaged species, but we should also not overstate the risks. We must balance risk with the immense ‘guaranteed’ value in bringing nature into our lives w/ greater public access to the Watershed. How many butterflies are there? How many do you expect to be killed by bicycles? I suspect the percentage is very low.” (Jamie Fox, Email, August 10, 2020)

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- “On snakes and frogs, I regularly run and hike in similar locales (Crystal Springs Cross County Course, Belmont Open Space, Wunderlich Park) and I've never seen snakes or frogs having been crushed by bicycles or horses. Given the low density of these animals and the infrequency of people crushing them in general, is there any data to support that trail use would kill these animals? It also seems out of proportion that protecting a sub-species of the common garter snake would take such precedence.
 - On butterflies host plants, I don't see why opening the trails would cause plants to be trampled. The trails already exist and are free of plants. From my experience Bay Area folks are rule followers and generally not interested in bushwacking through butterfly bushes when there is a perfectly good trail to use. Is there any evidence to the contrary?” (Tom Haxton, Email, June 25, 2020)
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RESPONSE BI-2

SAN FRANCISCO GARTER SNAKE

Several commenters note the presence of San Francisco garter snake in the project area; some express concern for project effects on this species, while others question the likelihood of project impacts. As stated in draft EIR Section 4.8, San Francisco garter snake is federally and state listed as endangered and a California Fully Protected species (p. 4.8-29, Table 4.8-3). Its range is highly localized and centered on the upper San Francisco Peninsula. As stated in Impact BI-2, surveys along the Ridge Trail for this species have found numerous individuals. In addition, snake mortality from bicycle traffic has been documented on a road adjacent to the Peninsula Watershed property.¹ The planning department appreciates commenters’ opinions regarding potential effects on San Francisco garter snake, based upon their personal hiking, biking or equestrian experiences. However, consistent with federal and state requirements, the project is required to fully avoid impacts on San Francisco garter snake, and that is the standard used in the EIR.

Regarding potential effects on San Francisco garter snake during construction, comment A-CDFW.3 states that exclusion fencing and exit funnels called for in Mitigation Measure M-BI-2a may not be fully effective at protecting snakes, and snakes may become trapped in fencing or coverboards. To minimize the potential for such effects, the commenter recommends full-time biological monitoring during construction and use of hand tools for vegetation removal in San Francisco garter snake habitat. The exclusion fencing identified in the mitigation measure is necessary to prevent San Francisco garter snake and special-status amphibian species, such as California red-legged frog, from transiting through the Fifield-Cahill ridge trail work area during

¹ U.S. Fish and Wildlife Service, *San Francisco Garter Snake (Thamnophis sirtalis tetrataenia) 5-Year Review: Summary and Evaluation*, U.S. Fish and Wildlife Service Sacramento Field Office, Sacramento, CA, September 2006.

construction within specific areas. Furthermore, Mitigation Measure M-BI-2a requires the qualified biologist to conduct a thorough survey of the entire construction footprint for San Francisco garter snake prior to construction; identify specific locations for the exclusion fencing and be present during, and oversee vegetation removal for, construction of the exclusion fence; and inspect the fence and the worksite daily, in order to detect any individuals that may have become trapped. In response to the recommendation in comment A-CDFW.3, the text of Mitigation Measure M-BI-2a on draft EIR pages 4.8-59 through 4.8-61 is revised to include the use of hand tools for vegetation clearing and a full-time monitor during vegetation clearing and initial ground disturbance. The measure is revised as follows:

Mitigation Measure M-BI-2a – Avoidance and Minimization Measures for Special-Status Reptiles and Amphibians.

The following measures shall be implemented before and during construction:

- Construction contractor(s) shall limit the construction disturbance area to that necessary for project construction and avoid outside areas by posting signage delineating the construction disturbance area with flags, stakes, or fencing.
- The SFPUC shall identify a qualified biologist (who has familiarity and field experience with the affected species, as described in M-BI-1d) to act as construction monitor before construction work begins.
- No more than two weeks prior to the onset of work activities and immediately prior to commencing work, the qualified biologist shall conduct a thorough survey of the entire construction footprint for San Francisco garter snake, California red-legged frog, and other special-status species with the potential to be present.
- The SFPUC shall ensure that, during work activities, all trash is properly contained in closed containers, removed from the work site and disposed of daily to avoid attracting predators to the site.
- The contractor and all site personnel in motorized vehicles shall maintain a speed limit of 15 miles per hour within the project area at all times.
- The construction contractor shall install a wildlife exclusion fence in or adjacent to wetland areas where earthmoving equipment will be used. The qualified biologist shall determine specific locations for the exclusion fencing and shall be present during, and oversee vegetation removal for, construction of the exclusion fence. Within San Francisco garter snake habitat areas where vegetation clearing would occur, initial vegetation thinning shall occur using hand tools. If mechanized hand tools such as string trimmers are used within San Francisco garter snake habitat, they will be used in the presence of a biological monitor (see last bullet) who ensures the absence of SFGS immediately ahead of vegetation clearing.
- In San Francisco garter snake habitat, the contractor shall install an exclusion fence containing exit funnels to allow any San Francisco garter snakes within the construction area to leave without human intervention, while preventing entry of San Francisco garter snake and California red-legged frog into the construction zone. A qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, as deemed necessary by the biologist. Exit funnels shall be placed no more than 200 feet apart along the fence, or as modified by the biological monitor. The exit funnels shall be installed at ground level. The contractor may use a qualified biologist as a full-time biological monitor in place of exclusion fencing. The monitor will survey the trail for the presence of San Francisco garter snake and California red-legged frog. If an

individual is observed, the monitor shall follow the procedures set forth in this measure (below) for responding in the event special status species are present within the exclusion fence area.

- At the beginning of each workday that includes initial ground disturbance, including grading, excavation, and vegetation-removal activities, the approved biologist shall conduct onsite monitoring for the presence of these species in the area where ground disturbance or vegetation removal will occur. The biologist shall inspect the perimeter fences to ensure they do not have any tears or holes, that the bottoms of the fences are still buried, and that no individuals have been trapped in the fences.
- Construction work crews shall cover all excavated or deep-walled holes or trenches greater than 2 feet at the end of each workday using plywood, steel plates, or similar materials or shall construct escape ramps of earth fill or wooden planks to allow animals to exit. Before such holes are filled, workers shall thoroughly inspect them for trapped animals.
- If a special-status species is present within the exclusion fence area during construction, work shall cease in the vicinity of the animal, and the animal shall be allowed to relocate of its own volition unless otherwise approved by the regulatory agencies with jurisdiction over the species.
- The contractor shall maintain the temporary fencing—both exclusion fencing and protective fencing (if installed)—until all construction activities are completed. No construction activities, parking, or staging shall occur beyond the fenced exclusion areas. After construction is completed, the contractor shall remove exclusion fencing, cover boards, and all associated debris and either store or dispose of it off site.
- Project personnel shall be required to immediately report any harm, injury, or mortality of a special-status species during construction (including entrapment) to the biological monitor, who shall immediately notify the SFPUC. As appropriate, the SFPUC shall provide verbal notification to the U.S. Fish and Wildlife Service’s Endangered Species Office in Sacramento, California and/or to the California Department of Fish and Wildlife warden or biologist (as applicable) and written notification, as requested, by the agencies.
- Full-time biological monitoring shall be provided during vegetation clearing and initial ground disturbance within San Francisco garter snake habitat. Once all clearing and initial ground-disturbing activities are completed, the biological monitor shall perform spot checks of the project area at least once a week, and daily between November and April during rain events, for the duration of construction to ensure that the perimeter fence is in good order, trenches are being covered if left open overnight (or escape ramps provided), project personnel are conducting checks beneath parked vehicles prior to their movement, and all other required biological protection measures are being followed.

With respect to potential effects of bicycle and equestrian impacts on San Francisco garter snake, comment A-CDFW.3 recommends restricting use of Fifield-Cahill and southern skyline ridge trails to pedestrians, who do not move fast enough to trample the species. The EIR acknowledges on pages 4.8-91 and 4.8-92 that increased, unsupervised equestrian and bicycle use along the Fifield-Cahill ridge trail could result in greater encounters of and harm to San Francisco garter snake, relative to supervised or pedestrian-only access. Similarly, the EIR explains on pages 4.8-95 and 4.8-96 that unsupervised use of the southern skyline trail could harm San Francisco garter snake; although, the EIR also notes the likelihood of visitors encountering the San Francisco garter snake along the southern skyline ridge trail is lower because of that trail segment’s distance from known habitat areas for this species. The EIR concludes impacts to San Francisco garter snake from unsupervised equestrian and bicycle use on Fifield-Cahill ridge trail would be significant and unavoidable with mitigation, while those for southern skyline ridge trail were found to be less than significant with mitigation.

The project's potential for a significant and unavoidable impact on San Francisco garter snake was of primary consideration in developing the EIR's Alternative C, Pedestrian-Only Access. As noted in Chapter 6, Alternatives, on page 6-23, "This EIR considers Alternative C because it would address the significant operational impacts related to the potential for unsupervised trail users, specifically bicyclists and equestrians, to harm special-status amphibians and reptiles along the Fifield-Cahill ridge trail." Under the alternative, public access to both the Fifield-Cahill ridge trail and southern skyline ridge trail would be restricted to pedestrians only; no bicycle or equestrian access would be permitted. The EIR's analysis of potential effects under Alternative C found that impacts on San Francisco garter snake and special-status amphibians would be reduced to a less-than-significant level for both Fifield-Cahill ridge trail and southern skyline ridge trail. However, as explained on page 6-24, the analysis also concluded that Alternative C would still result in the same significant unmitigable impacts as the project for other environmental topics, and would not meet the project objectives as well as the project.

SAN FRANCISCO DUSKY-FOOTED WOODRAT

Comment A-CDFW.3 notes the potential for San Francisco dusky-footed woodrat to be impacted by the project. As the commenter notes, the EIR's Impact BI-2 identifies the potential for project construction to damage occupied woodrat nests, which could result in the loss of woodrats, a significant impact. To minimize the potential for such effect, the EIR calls for Mitigation Measure M-BI-2c, which would involve preconstruction surveys of the construction area for woodrat nests; flagging of any identified nests for avoidance; and dismantling by a qualified biologist, in accordance with CDFW guidelines, nests that cannot be avoided. To further minimize potential effects of the project on woodrats, the commenter recommends relocation of nests if more than 10 require removal and encourages notification before nests are removed or impacted. In response to the recommendation in comment A-CDFW.3, the text of Mitigation Measure M-BI-2c on pages 4.8-72 and 4.8-27 is modified to include relocation and notification as follows:

Mitigation Measure M-BI-2c – Avoidance and Minimization Measures for Dusky-Footed Woodrat and American Badger.

The following measures shall be implemented to avoid and minimize impacts on dusky-footed woodrat and American badger, if present:

- A qualified biologist with experience identifying woodrat nests and badger dens shall conduct a preconstruction survey for San Francisco dusky-footed woodrat nests and American badger dens in suitable habitat along: the universal access loop trail, staging area, parking lots; the southern skyline ridge trail work area, parking lot, and staging areas; and all fencing work areas along the southern skyline ridge trail and Fifield-Cahill ridge trail. The qualified biologist shall flag active nests/dens identified within the project work areas as a sensitive resource to be avoided during construction.
- Should avoidance of active woodrat stick nests within the project site not be feasible, the nests material shall be dismantled by hand and relocated to a nearby area under the supervision of the qualified biologist, consistent in coordination with California Department of Fish and Wildlife guidance and permits, as applicable. If young are encountered during dismantling/relocation of the nest material, the material shall be replaced placed back and a 20-foot no-disturbance buffer shall be established around the active nest. The biologist shall inspect the nest at least 2448 hours later to see if the young are present. If the young are still present, the buffer shall remain in place until the woodrats have matured enough to disperse on their own accord and the nest is no longer active.

MARBLED MURRELET

Comment A-CDFW.3 notes the potential for project maintenance activities to significantly impact marbled murrelets. To reduce the potential for such effects the commenter recommends implementation of a mitigation measure restricting such activity to outside nesting season (March 15 to September 15). The EIR's Impacts BI-2 and BI-5 describe the marbled murrelet habitat in proximity to the project work areas, the current watershed management activities that regularly occur within these areas and the associated minor auditory and visual disturbances to the species that could result, as well as the potential for project activities to temporarily increase those types of disturbances.

The EIR explains the SFPUC's current watershed maintenance activities in the habitat areas (e.g., mowing, service road maintenance) observe U.S. Fish and Wildlife Service guidelines for minimizing auditory and visual disturbance to murrelets (p. 4.8-67). More specifically, and consistent with current practice, draft EIR Chapter 2, Project Description, states (p. 2-29):

SFPUC would generally require activities that generate very high noise levels to be conducted outside of the marbled murrelet nesting season (March 15 to September 15). However, the SFPUC might allow some activities with such noise levels late in the season (i.e., July to September), if a qualified biologist confirms that, based upon appropriately-timed survey(s), that there is no marbled murrelet nesting activity within 0.25-mile of the noise-generating activity.

As explained in Impact BI-5 (pp. 4.8-100 through 4.8-101), through the SFPUC's continued observance of the U.S. Fish and Wildlife Service guidance, project maintenance activities would not result in substantial adverse effects on marbled murrelet. For these reasons, mitigation restricting maintenance activities to outside of the marbled murrelet nesting season is not required to avoid or minimize a significant project effect.

Comment A-CDFW.3 also recommends adding a mitigation measure to protect murrelets from known nest predators such as ravens and jays by removing all food and garbage daily from the site. The EIR's Impacts BI-2 and BI-5 explain the relationship between human food waste and corvid population growth, the effect of corvid population growth on marbled murrelet, and the potential for project-related increases in food waste to indirectly adversely affect marbled murrelet. The draft EIR explains that while the potential for substantial increases in food waste under the project are generally low, such increases would not be expected under the proposed access program or variant 1 due to the docent's presence (p. 4.8-101). Given the rarity and susceptibility of marbled murrelets to disturbance, the EIR conservatively concludes that food waste could increase under variants 2 and 3 along Fifield-Cahill ridge trail, which could indirectly increase nest predation, a significant impact (p. 4.8-102). To reduce this impact, the EIR calls for implementation of Mitigation Measure M-BI-4, which requires garbage containers at trailheads be emptied daily and project area be scanned daily for litter and food waste.

Comment A-CDFW.3 recommends daily removal of refuse which is generally consistent with Mitigation Measure M-BI-4 (p. 4.8-89). In response to Comment A-CDFW.3, the measure is modified to clarify that litter and food waste shall be collected and removed during daily sweeps, as follows:

- The SFPUC shall provide closed (wildlife-proof) garbage containers at trailhead parking areas for the disposal of trash items (e.g., wrappers, cans, bottles, food scraps) and empty them daily. The SFPUC shall scan the project area and remove ~~for~~ litter and food waste during daily sweeps.

MISSION BLUE AND SAN BRUNO ELFIN BUTTERFLY

Commenters I-Bridgeman-1.1 and I-Haxton.1 question the EIR's conclusion regarding potential project effects on special-status butterflies. As stated in draft EIR Section 4.8, the San Bruno elfin butterfly and Mission blue butterfly are federally listed as endangered species (p. 4.8-29, Table 4.8-3). Their range is limited to discrete areas within the San Francisco Bay Area. As explained in Impact BI-5 (p. 4.8-103), lupine species—the larval host plants for Mission blue butterflies—tend to grow along trail edges, even between tire tracks on the Fifield-Cahill ridge trail. As a result, increased, unsupervised trail use from pedestrians, bicyclists, and equestrians would increase the potential for visitors to inadvertently trample or crush plants within the roadway. As further explained in Impact BI-5, the destruction of host plants may result in the destruction of larvae and permanent loss of occupied habitat for these butterflies, a significant impact. The planning department appreciates commenters' opinions regarding potential effects on butterflies, based upon their personal experiences. However, consistent with federal requirements, the project is required to minimize impacts on Mission Blue and San Bruno elfin butterfly, and that is the standard used in the EIR.

RECREATIONAL USE IMPACTS

Several commenters address the potential for recreational use of the Peninsula Watershed trails to impact special-status wildlife species. As explained in Section 4.8.4.2, *Approach to Analysis*, the EIR evaluates potential effects of the project, including the operational effects that may result from increased recreational use, relative to existing conditions, which also currently include recreational use (p. 4.8-44). Impact BI-5 (pp. 4.8-89 through 4.8-109) addresses the potential direct and indirect effects of increased recreational use of the watershed on a range of special-status wildlife with moderate or higher potential to occur in the watershed, including San Francisco garter snake, California red-legged frog, marbled murrelet, special-status butterflies, nesting birds and special-status bats, San Francisco dusky-footed woodrat, and American badger, among others, as well as potential effects on wildlife movement and migration. As explained in Section 4.8.2, Environmental Setting, studies have indicated that increasing human recreation can have a negative impact on wildlife and the natural environment. However, the analysis also explains that such impacts can be limited by effective land management, including adherence to established rules and minimizing improper use of recreational lands. As stated under Impact BI-4 (p. 4.8-87):

As indicated in a recent survey of recreational land managers in the project vicinity...overall, agencies have curbed significant adverse impacts stemming from improper uses by posting educational signage, installing fencing and physical barriers, performing regular maintenance, and conducting daily patrols and enforcement.

The EIR analysis identifies potentially significant impacts of increased recreational use on special-status wildlife or habitat, and identifies mitigation measures that would reduce those impacts, where feasible. These measures include, but are not limited to, those identified by regional land managers as effective at minimizing such adverse effects.

With respect to impacts of mowing, the EIR acknowledges existing mowing and maintenance activities along the Fifield-Cahill service road in the analysis of potential project effects on biological resources (Section 4.8) under Impacts BI-1, BI-2, BI-4, BI-5 and BI-6. As noted in Response BI-1, the EIR acknowledges mowing is currently conducted on a regular basis and, therefore, considers it as part of the environmental baseline for this project. The EIR's analysis is primarily concerned with the potential physical environmental effects of the project relative

to that baseline condition (CEQA Guidelines section 15125(a)). Thus, the existing mowing practices are not the subject of the EIR analysis.

Comment BI-3: Non-native/Invasive Species

This response addresses the following comment, which is quoted below:

O-GGAudubon.5

“3. Non-native invasive weeds and other pests: Trails are pathways for invasion of weeds and diseases that compromise ecosystem health.

- A 2015 global review invasive species literature found “the abundance and richness of non-native species are significantly higher in sites where tourist activities take place than in control sites.”, particularly when tourism takes the form of outdoor recreation (Anderson, et al., 2015).
- Problematic invasive species include: diseases (e.g. sudden oak death, already present in the Watershed), flammable weeds (e.g. annual grasses), and numerous aquatic plants and animals that can impact water delivery systems
- The informal trails study found that the presence of (unauthorized) informal trails “leads to significant changes in Forest Park plant communities that favor invasive and ruderal species”, particularly close to the trails. (Van Winkle, 2014)
- Facilitation of the spread of invasive species into natural areas by informal trails is two-fold: seeds are transported by users and wildlife along the trail corridor, and the disturbance to native vegetation and soil creates an opening for these seed to establish. (Van Winkle, 2014)”

(Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

RESPONSE BI-3

Impact BI-7 in the EIR considers the potential for invasive species and spread of plant pathogens to increase with recreational use and trail development. As explained in the context of unsupervised access on page 4.8-115, increases in visitation “would result in a commensurate increase in the potential spread of invasive plants by visitors. The spread of invasive plants in the course of project operations would have impacts on... sensitive and special-status vegetation communities... (e.g., ability to spread and outcompete, difficulty controlling, etc.)”. The draft EIR also notes on page 4.8-115 that “unsupervised visitors would be more likely to trample vegetation, allowing for the spread of weed propagules, and to carry propagules from outside the watershed.”

Regarding sudden oak death (and other pathogens of the *Phytophthora* genus), the draft EIR states on page 4.8-118 that “*Phytophthora* spp. are transported through natural mechanisms (e.g., wind and rain) as well as through human activities (e.g., pathogen-infected mud or vegetation carried on shoes or tires). The potential spread of plant pathogens is fully considered in the draft EIR, both during construction and from recreational use (see Impact BI-7, page 4.8-113 through 4.8-121). The draft EIR concludes on page 4.8-118 that, “While the current extent and rate of transmission within the watershed remains unknown, it is possible that

with an increase in the number of visitors to the Fifield-Cahill ridge trail, the rate of transport and potential spread of *Phytophthora* spp. along the trail could also increase.”

To address these impacts, the EIR identifies Mitigation Measure M-BI-7a and explains that implementation of the measure would reduce potential project effects related to invasive species through development of an invasive plant management plan, including “semiannual surveys and treatment and removal of target invasive plants on the southern skyline ridge trail and Fifield-Cahill ridge trail segments during the operation of the ridge trail.” For sudden oak death, the EIR identifies Mitigation Measure M-BI-7b and explains that the measure would reduce potential project effects related to pathogen spread through posting signage and training volunteers to educate visitors about how to prevent transmission of these pathogens. If warranted, M-BI-7b calls for consideration of additional measures recommended by the *Phytophthora* Working Group, such as wash stations.

The EIR concludes that, with mitigation, project operations involving docent-led access would result in a less-than-significant effect related to invasive plants and spread of plant pathogens. The EIR also concludes that with mitigation, project operations involving unsupervised access would result in a less-than-significant effect related to invasive plants, but a significant and unavoidable impact related to the spread of plant pathogens. As explained on p. 4.8-119, in the absence of supervision from docents, it cannot be concluded with certainty that all unsupervised visitors would comply with mandated pathogen control measures (e.g., sanitation measures).

The EIR addresses the potential for the creation or use of unauthorized trails. As stated under Impact BI-4 (p. 4.8-87) in the context of unsupervised access:

“Off-trail usage may occur in areas where visitors wish to obtain better views, in attractive areas for stopping, or where users wish to create informal trails. These types of off-trail usage could result in damage to special-status plants, either directly as visitors trample and crush these plants or indirectly through soil compaction; the spread of invasive plants, which could change the local species composition; or through erosion in unvegetated areas.”

To mitigate for these potential impacts, the draft EIR identifies Mitigation Measure M-BI-4 and explains on 4.8-88 that its implementation would reduce such adverse effects to a less-than-significant level through annual surveys, monitoring, and adaptive measures to address detected declines in populations due to trail use or unauthorized off-trail usage, among other actions.

Comment BI-4: Wildlife Movement and Migration

INDIVIDUAL COMMENTS

This response addresses the following individual comments, which are quoted below:

A-CDFW.1, O-BARTC-1.5, O-GreenFoothills.6, O-Miden.7, O-POST.4, O-SequoiaAudubon.2, O-SierraClub.2, I-Ferrari.2, I-Ferreira.2, I-German.2, I-Korbholz_K.2, I-Liebes_S.2

“**Issue:** The Project proposes to install barbed-wire fencing as a perimeter fence along the proposed trail.

Evidence the impact would be significant: Fencing can be a hazard to wildlife causing entanglement and mortality (van der Ree 1999, Stuart et al. 2001, Harrington and Conover 2006).

Recommendations to minimize significant impacts: CDFW recommends using wildlife friendly fencing throughout the Project area. A guide to wildlife friendly fences, *Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind*, can be found online at <https://wildlife.ca.gov/Grants/FRGP/Guidance>. (Gregg Erickson, California Department of Fish and Wildlife, Letter via Email, August 6, 2020)

“The Council has an additional suggestion related to the fencing proposed in the DEIR. The Council urges SFPUC to utilize wildlife friendly fencing, rather than the proposed barbed wire fencing along the border of the trail as described in Section 2.5.1.1 (pg. 2-18). Installing such fencing will reduce the potential adverse impacts from ‘off trail’ travel by trail users while allowing safe wildlife passage; however, as proposed, the barbed-wire fencing may present a hazard to native wildlife. Installation of wildlife compatible fencing with design features such as three-wire fencing lower than 42”, smooth bottom wires, and additional clearance on the bottom wire for wildlife passage, should be used to prevent wildlife mortality in the project area. This is a concern of both the Council and local conservation and wildlife protection groups that can be easily mitigated by implementing best management practices and best available science in wildlife friendly fencing.” (Janet McBride, Bay Area Ridge Trail Council, Letter via Email, August 7, 2020)

“The DEIR does not identify potentially significant impacts to wildlife connectivity from the proposed barbed wire fencing along the Southern Skyline ridge trail alignment that is intended to discourage trespassing. As described in Section 2.5.1.1 Security Features, page 2-18, the SFPUC is considering a range of barbed-wire fencing types, with heights ranging from 42 to 60 inches, strands ranging from five to seven, and with smooth un-barbed bottom wires ranging from 12 to 18 inches above the ground surface. Native deer and other large indigenous wildlife species attempting to cross over or through such fencing could become entangled in the barbed wire.

Combining smooth wire fencing no higher than 42 inches and at least 16 inches above ground surface with a living fence of native blackberry and poison oak is one possible solution that could meet both objectives.” (Lennie Roberts, Green Foothills, Letter via Email, August 10, 2020)

“As the Project proposes between 9 to 25 miles of new fencing, the District requests the use of wildlife friendly fencing for this project as a method to reduce impacts on wildlife movement while ensuring that users remain on designated trails. The District recommends that wildlife-friendly fencing include smooth wire spaced at least (12) inches apart, with the lower wire placed twenty (20) inches from the ground to allow animals to pass through, over, or under the fence.” (Ana Ruiz, Midpeninsula Regional Open Space District, Letter via Email, August 10, 2020)

“Wildlife-friendly Fencing: The proposed barbed wire fencing along the length of the trail [Section 2.5.1.1] will present hazards to native wildlife through direct injury or mortality, reduction of movement across the landscape [Section 4.8.4.1], and possibly directing wildlife to hazardous roads and parking areas.

POST recommends the use of wildlife compatible fencing where needed, including features such as smooth-wire spaced at least 12 inches apart, at least 20 inches of ground-level clearance, and a maximum height of 42 inches.

11. Responses to Comments

11.6 Biological Resources

This Project will close a significant regional gap in the Ridge Trail and provide an excellent opportunity for the public to recreate responsibly on their watershed lands. POST appreciates the SFPUC's and Planning Department's leadership on this Project, and we look forward to continuing to work with you to advance its completion." (Walter Moore, Peninsula Open Space Trust, Letter via Email, August 10, 2020)

"Sequoia Audubon is concerned that the fencing proposed is not wildlife friendly.

Wildlife-friendly fences allow wildlife to jump over or crawl under without risk of injury. A 5' fence with barbs can easily injure animals and while an adult deer would easily jump that fence, it would be too high for a fawn to jump over. Also, low-flying birds, such as Northern Harriers, might have difficulty spotting this type of fence and could easily become entangled in the barbed wire. A wildlife-friendly fence should preferably be no more than 42" above the ground; have at least 12" between the top two wires; a bottom wire that is at least 16" above the ground; smooth wire on the top and bottom; and preferably markers along the top wire to alert birds. (Ref: A Landowner's Guide to Wildlife Friendly Fences: How to Build a Fence with Wildlife in Mind (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=134713&inline>) (Marshall Dinoqitz and Leslie Flint, Sequoia Audubon Society, Letter via Email, August 7, 2020)

"We support fencing to contain the small but impactful percentage of users that may be tempted to engage in destructive trespass. It is important, however that the fencing be as wildlife friendly as possible while achieving its main purpose." (Mike Ferreira and Arthur Feinstein, Sierra Club San Francisco Bay, Letter via Email, August 10, 2020)

"I also ask that you use wildlife-friendly fencing and not barbed wire fencing along the new trails." (Ellie Ferrari, Email, August 8, 2020)

"I do have some lingering concerns about the impacts to general wildlife in terms of loss of habitat due to the future frequency of human activity and I am hopeful that there will be some consideration given to compensatory mitigation. I would also like to see adequate critter-friendly fencing that would constrain a noisome minority of trail users from abusing habitat while allowing the migration that animals need for healthy breeding." (Michael Ferreira, Email, August 6, 2020)

"We are seeing quite a bit of concern for the safety and preservation of butterflies, frogs and reptiles. We are seeing little concern for large, migratory animals (Section 4.8). Installing six miles of two parallel barbed-wire fences will be a much more solid barrier for deer, mountain lions and other large animals which frequently dodge the traffic of Highway 35. Our community has recently been made aware that we share our environment with mountain lions and have learned to appreciate them." (Carrie and Tim German, Email, July 23, 2020)

"Please use wildlife friendly fencing when constructing the proposed trails." (Kathy Korbholz, Email, August 6, 2020)

“... and urge them to use wildlife friendly fencing along new trail segments.” (Sidney Liebes, Email, August 7, 2020)

REPRESENTATIVE COMMENTS

This response also addresses the following comments, which are similar or identical to the representative comment quoted below:

BI-4 REPRESENTATIVE COMMENT 1

I-Allemand.2, I-Applewhite.2, I-Armer.2, I-Ashley.2, I-Axelrod.2, I-Baldwin.2, I-Benioff.2, I-Bergman.2, I-Bobier.2, I-Brady.2, I-Bryan.2, I-Burger.2, I-Cancell.2, I-Clark_M.2, I-Corley.2, I-Crow.2, I-Davis.2, I-Drazic.2, I-Drouin.2, I-Dsouza.2, I-Eckelmeyer.2, I-Ellison.2, I-Eisen.2, I-Evanston.2, I-Forrister.2, I-Giusti.2, I-Goldstein.2, I-Goodrum.2, I-Haydon_L.2, I-Hiestand.2, I-Homan.2, I-Ingram.2, I-Kaye.2, I-King_K.2, I-King_S.2, I-Korbholz_W.2, I-Langham.2, I-Liebes_L.2, I-Lubin.2, I-Martin_D.2, I-MacKenzie.2, I-Marbury.2, I-McBride.2, I-McKnight.2, I-Moore_D.2, I-Moore_R.2, I-Morey.2, I-Newlands.2, I-Nye.2, I-Pielenz.2, I-Perrone.2, I-Rarback.2, I-Ray.2, I-Schryver.2, I-Smith_S.2, I-Snyder.2, I-Spak.2, I-Spangler_M.2, I-Trapp.2, I-Walczak.2, I-Warne.2, I-Willard.2, I-Wright.2, I-Wyman.2, I-VanSchoyck.2, I-Zamel.2, I-Zermeno.2

“To best provide for wildlife connectivity, wildlife friendly fencing should be used along new trail segments instead of the proposed barbed wire fencing.” (Sofia Allemand, Email, August 7, 2020; Anthony Applewhite, Email, August 6, 2020; Joan Armer, Email, August 6, 2020; John Arnold, Email, August 6, 2020; Kate Ashley, Email, August 6, 2020; David Axelrod, Email, August 7, 2020; Donald Baldwin, Email, August 6, 2020; Jeanne Benioff, Email, August 6, 2020; Claudette Bergman, Email, August 6, 2020; Kristine Bobier, Email, August 7, 2020; William Brady, Email, August 7, 2020; Susan Bryan, Email, August 7, 2020; Ursula Burger, Email, August 6, 2020; June Cancell, Email, August 6, 2020; Matthew Clark, Email, August 7, 2020; Kristi Corley, Email, August 6, 2020; Carolyn Crow, Email, August 6, 2020; Janet Davis, Email, August 6, 2020; Stephanie Drazic, Email, August 7, 2020; Lisane Drouin, Email, August 6, 2020; Gladwyn DSouza, Email, August 6, 2020; Karin Eckelmeyer, Email, August 6, 2020; Adam Eisen, Email, August 7, 2020; Sally Ellison, Email, August 6, 2020; Luci Evanston, Email, August 7, 2020; Ann Forrister, Email, August 6, 2020; William Giusti, Email, August 6, 2020; Chip Goldstein, Email, August 7, 2020; James Goodrum, Email, August 7, 2020; Noah Haydon, Email, August 6, 2020; Susan Hiestand, Email, August 7, 2020; William Homan, Email, August 6, 2020; Peter Ingram, Email, August 10, 2020; Theodore Kaye, Email, August 6, 2020; Kenneth King, Email, August 7, 2020; Steven King, Email, August 6, 2020; William Korbholze, Email, August 6, 2020; Kevin Langham, Email, August 6, 2020; Linda Liebes, Email, August 7, 2020; Thalia Lubin, Email, August 6, 2020; Michelle Mackenzie, Email, August 6, 2020; Janet Marbury, Email, August 6, 2020; Deirdre Martin, Email, August 7, 2020; Lori McBride, Email, August 6, 2020; Robin McKnight, Email, August 9, 2020; David Moore, Email, August 6, 2020; Rhoda Moore, Email, August 6, 2020; Gail Morey, Email, August 8, 2020; Allan Newlands, Email, August 8, 2020; Adelaide Nye, Email, August 6, 2020; David Perrone, Email, August 6, 2020; Christine Pielenz, Email, August 8, 2020; Harvey Rarback, Email, August 6, 2020; Kathleen Ray, Email, August 7, 2020; Thomas Schryver, Email, August 6, 2020; Sarah Smith, Email, August 6, 2020; John Snyder, Email, August 6, 2020; Margar Spak, Email, August 6, 2020; Mary Spangler, Email, August 6, 2020; Onnolee Trapp, Email, August 6, 2020; Manon VanSchoyck, Email, August 6, 2020; Susan Walczak, Email, August 6, 2020; Kathy Warne, Email, August 8, 2020; Ann Willard, Email, August 7, 2020; Beverly Wright, Email, August 6, 2020; Will Wyman, Email, August 6, 2020; Karen Zamel, Email, August 6, 2020; E. Zermeno, Email, August 6, 2020)

RESPONSE BI-4

The commenters express concern that the project's proposed barbed wire fencing may inhibit the movement of large wildlife species such as deer and mountain lion. As explained in Chapter 2, the SFPUC proposes to install fencing along the southern skyline ridge trail, and along the Fifield-Cahill ridge trail under access program variants 2 and 3. As described on page 2-18 of the draft EIR:

“This fencing would mainly be 5-foot-tall, barbed-wire fence... strung between metal posts spaced approximately 10 feet apart. The SFPUC is considering a range of barbed-wire fencing types, with heights ranging from 42 to 60 inches, strands ranging from five to seven, and with un-barbed bottom wires ranging from 12 to 18 inches above the ground surface.”

The commenters request the project utilize fencing that meets wildlife-friendly fencing standards and offer a number of characteristics of such fencing including height, bottom-wire elevation, barbless wire, number of strands, etc. The commenters also provide reference to published guidance for such fencing, which generally recommend fencing no higher than 40-42 inches to allow wildlife passage over the fence, with bottom wires no less than 16-18 inches from the ground to allow passage beneath.²

The fencing described in the EIR's project description covers a range of potential sizes and configurations, which encompasses the wildlife-friendly fencing standards identified by commenters. Since publication of the draft EIR, the SFPUC has refined the project description to include more specific details regarding the types and locations of proposed barbed wire fencing. The fencing descriptions in Chapter 2, Project Description (pp. 2-18 and 2-20), for the southern skyline ridge trail and Fifield-Cahill ridge trail, respectively, have been revised as presented in Chapter 9, Revisions and Clarifications to the Project Description, Section 9.2, Draft EIR Revisions, to include more specific information regarding the types and locations of proposed barbed wire fencing. The revisions provide more specific wildlife friendly design details for both interior and exterior boundary fencing options.

Commenters also mention potential impacts to mountain lion, a candidate threatened species in the watershed. The watershed lands are a valuable, unfragmented landscape for this species. The draft EIR addresses potential effects of the proposed fencing on wildlife movement under impact BI-5 (pp. 4.8-107 through 4.8-109). As explained in the impact discussion, the proposed fencing would not substantially impede wildlife movement across the Fifield-Cahill ridge trail, as animals would be able to pass beneath or over the fence (p. 4.8-108). Even large mammals such as mountain lion and mule deer are able to cross below an 18-inch unbarbed fence wire.³ While external fencing for the watershed would have a 12-inch bottom wire, this fencing would be used in areas with high levels of human traffic, such as Cemetery Gate, that are not important wildlife corridors. The draft EIR also notes that the existing topography, fencing, and S.R. 35 presently reduce the utility of this the southern skyline ridge trail alignment as a wildlife movement corridor (p. 4.8-109). Thus, while the fencing might limit use by some wildlife more than under baseline conditions, any change would not be significant given existing conditions. The project description refinements identified above do not affect the analysis or conclusions presented in the EIR regarding project effects on wildlife movement or migration.

² Montana Fish, Wildlife and Parks. 2012. Landowner's Guide to Wildlife-Friendly Fencing. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=134713&inline>, accessed March 10, 2021.

³ Arizona Game & Fish Department, 2008. Wildlife Compatible Fencing. https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/110125_AGFD_fencing_guidelines.pdf

Comment BI-5: General Wildlife and Habitat

This response addresses the following comments, which are quoted below:

O-Post.3, O-SierraClub.3, I-Brousseau-5.1

“2. Operating Impacts on Wildlife: The biological impacts analysis focuses on direct impacts during construction, such as mortality and behavior disruption, and loss of habitat in the Project’s footprint [Section 4.8.4.4]. We agree that these impacts are significant. However, additional documented impacts to wildlife behavior due to the presence of people are not well addressed. The analysis of the impacts to wildlife from increased human presence is inadequate to understand the biological impacts of the Project.

We recommend additional analyses to reflect the best available science on the impacts of non-consumptive recreation on wildlife (e.g. mammals, birds, amphibians, reptiles, insects), including potential impacts to wildlife behaviors in and outside the immediate vicinity of the proposed trail, such as potential spatiotemporal effects on wildlife community composition and ecological relationships.¹

POST recommends additional analyses on potential impacts to mountain lion (*Puma concolor*), a candidate for listing under the California Endangered Species Act, given its particular needs, role in the ecosystem, and existing habitat fragmentation in the region, and other Species of Special Concern. We encourage the development of a monitoring and adaptive management plan to assess the above potential impacts to wildlife and habitat due to public recreation and tie monitoring results to corresponding management responses. Monitoring should ensure future analyses of changes in species behavior (e.g. shifts in day time use of the Project area, changes to nesting or foraging behavior) in adjacent buffer areas is also feasible.” (Walter T. Moore, Peninsula Open Space Trust, Letter via Email, August 10, 2020)

¹ See for example: Lucas, E. (2020). Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs. California Fish and Wildlife, Recreation Special Issue; 29-51.

“We do have a lingering concern as to appropriate mitigation for the cumulative removal/degradation of habitat that is an obvious consequence of the trail construction itself.” (Mike Ferreira and Arthur Feinstein, Sierra Club, Letter via Email, August 10, 2020)

“The Biological Resources content beginning on page 15 talk about potential impact to biological resources but are incomplete. I request that the EIR create a visual to show precisely when during the year each potential impacted species would be potentially using the Fifield-Cahill trail during daytime hours. As an example, it has previously been pointed out that the California Red-Legged Frog may be in the area, but also that it is typically found near water - which does not exist on the road. It may be possible that the frog (and other species) migrate onto the road during specific periods of the year - and we should understand that as compared with proposed project usage. It would help decision makers understand the potential impact if this were a graphic, rather than just written narrative.

A similar analysis should be done for time of day. There is a lack of clarity in the EIR as to when certain species are active in a summary way. It would be helpful, and I request that the EIR include a simplified summary graphic showing the relative activity level of each species for each time of day, as compared with proposed project usage.” (Christopher Brousseau, Email, August 9, 2020)

RESPONSE BI-5

With respect to the project's implications for wildlife raised in comment O-POST.3, the EIR evaluates the potential effects that could result from both project construction (Impact BI-2) and operations (Impact BI-5) activities, including the effects of increased human presence. The analysis follows the CEQA Guidelines, which state:

“An EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published...”

As explained in Chapter 2, Project Description, and Section 4.8, Biological Resources, the project is proposed for locations within the watershed that currently experience regular human presence, or are near such areas. The project's trail and access improvements proposed for areas north of S.R. 92 would mainly occur along or near the existing Fifield-Cahill service road which is used regularly by recreationists and watershed maintenance staff. The majority of the proposed universal access loop trail would be located within 300 feet of the Cahill service road and adjacent to the existing Cemetery Gate parking and staging area. Similarly, the project's proposed trail and access improvements proposed for areas south of S.R. 92 would generally follow the S.R. 35 alignment, with most of the trail located within 200 feet of the road. Wildlife tend to avoid automobile traffic and avoid or become habituated to areas of frequent human use.⁴ As a result, the project's siting of project elements in proximity to areas of existing human traffic would not substantially affect wildlife behavior within these areas.

The planning department acknowledges that non-consumptive recreation, including hiking, bicycling, and horseback riding, has been documented to result in adverse effects on wildlife, and that such adverse effects can sometimes result from small perturbations.⁵ The potential for such effects is considered in the EIR's analysis. As explained on page 4.8-69, the Peninsula Watershed Management Plan EIR (2001) identified the potential for increased trail use to result in adverse effects on listed butterflies, and called for monitoring, among other measures, to reduce the potential for such effects. The SFPUC has conducted annual monitoring for San Bruno elfin butterfly and Mission blue butterfly since docent-led visitation began in 2003; those surveys have shown no impact from the docent-led public trail use (p. 4.8-103). As explained on page 4.8-65, the management plan EIR also identified the potential for human disturbance on the species, and called for monitoring, among other measures, to minimize the effect. The SFPUC has conducted annual monitoring for marbled murrelet since the docent-led visitation began in 2003; each year monitors have observed murrelets (p. 4.8-65). As also explained in the draft EIR, despite the docent-led access program, annual service road mowing, and regular watershed maintenance vehicle access, the SFPUC has recorded no take of San Francisco garter snake (p. 4.8-29) or California red legged frog (p. 4.8-97) since docent-led public trail use began in 2003.

The EIR's analysis considers the potential physical environmental effects of the project in the context of and relative to this existing baseline condition, and identifies those which could be significant. As explained in Impact BI-5, based upon the annual results of monitoring since docent-led access program inception, continued and expanded docent-led access is not expected to result in substantial adverse effects on wildlife.

⁴ Lucas, E. (2020). Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs.... California Fish and Wildlife, Recreation Special Issue; 29-51.

⁵ Lucas, E. (2020). Recreation-related disturbance to wildlife in California – better planning for and management of recreation are vital to conserve wildlife in protected areas where recreation occurs.... California Fish and Wildlife, Recreation Special Issue; 29-51.

However, the EIR does acknowledge that increased recreational use under an unsupervised access program could result in substantial adverse effects on wildlife species, including mountain lion, now a state candidate endangered species.

The draft EIR notes that the trails would be closed at night when mountain lions and most other wildlife species are more active, but that increased human traffic in daytime could result in an increase in trail avoidance behavior for species active during the day (p. 4.8-108). The EIR identifies mitigation, including measures M-BI-5a and M-BI-5b, to reduce these effects. As outlined in Mitigation Measure M-BI-5a, the EIR calls for continuation of the special-status butterfly and marbled murrelet monitoring, restrictions on hours of use to minimize human disturbance during periods when wildlife are most active, and other measures to generate greater public awareness of the watershed's sensitive resources. Mitigation Measure M-BI-5b provides additional protections for wildlife and habitat that might be disturbed due to greater unsupervised recreational use. Notably, the measure calls for implementation of additional protective measures if the monitoring called for in measure M-BI-5a records a decline in the monitored species' populations. These measures could include additional fencing, signage, enforcement, access program modifications, and trail relocation or closure (pp. 4.8-92 through 4.8-94).

The planning department appreciates the commenter's suggestion for expanded monitoring and adaptive management for the project. Regarding the commenter's request of that the project include monitoring and adaptive management measures, the EIR's mitigation measures call for the continuation of special-status species monitoring (M-BI-5a) and adaptive management in the event that such monitoring reveals declines in species populations (M-BI-5b and M-BI-5c).

Comment O-SierraClub.3 expresses concern for the cumulative impact of habitat removal or degradation which the commenter asserts "is an obvious consequence of the trail construction itself". The Fifield-Cahill ridge trail portion of the proposed project is proposed for an existing service road. The new trails to be constructed for the project include the universal access loop trail and the southern skyline ridge trail. The southern skyline ridge trail runs along Highway 35 and thus contains only marginal wildlife habitat. The universal access loop trail alignment is located in secondary-growth Douglas fir forest, close to the existing service road, where an existing cleared pathway exists. As explained in Impacts BI-3 and BI-8, project construction could disturb up to 1.27 acres of sensitive natural communities (under variants 2 and 3), and would require removal of between approximately 125 and 140 trees. Mitigation Measure M-BI-3 is recommended to minimize and compensate for impacts on sensitive natural communities and would reduce the impact to less than significant (p. 4.8-81). The draft EIR analysis also explains on page 4.8-122 that the limited number and small size of trees anticipated for removal within the heavily forested 23,000-acre watershed would not materially affect environmental factors concerning microclimates, animal habitats, soil conditions, or other environmental benefits of trees. Considering these impacts and those of other projects in the cumulative scenario, the draft EIR's cumulative impacts analysis concludes on page 4.8-124, "The incremental contribution of the project's effects would not be cumulatively significant, considering the limited extent of cumulative project effects relative to the total watershed area, the temporary nature of the effects, and the minimal project area overlap."

Regarding the timing and seasonality of wildlife use, the EIR identifies behavioral patterns of wildlife species found in the watershed. The EIR's analysis of potential project effects on wildlife movement addresses how the project might affect animals active at night (nocturnal), twilight (crepuscular), and daytime (diurnal), as these factors are relevant to the impact discussion. As stated in Section 4.8, most wildlife species, including

11. Responses to Comments

11.6 Biological Resources

mountain lion, are primarily active around dawn and dusk. For this reason, Mitigation Measure BI-5a limits trail use to 9 a.m. to 4 p.m. in winter (pacific standard time), and 8 a.m. to 6 p.m. in summer (p. 4.8-92). Where more specific behavioral information is needed to understand the impact, the EIR provides that information. For example, the draft EIR's analysis of potential effects on nesting birds and bat maternity roosts (p. 4.8-74) considers the breeding season and maternity roosting season, as those seasonal windows are integral to the analysis of project effects on these animals. Geographic and temporal dispersal information relevant to the impact discussion for San Francisco garter snake and California red-legged frog is presented on draft EIR pages 4.8-58 and 4.8-64, respectively. This approach is consistent with CEQA Guidelines section 15125, which states, "The description of the environmental setting shall be no longer than is necessary to provide an understanding of the significant effects of the proposed project and its alternatives."

11.7 Hydrology and Water Quality

The comments and corresponding response in this section cover the subject included in draft EIR Section 4.10, Hydrology and Water Quality. The comment topics relate to:

- HY-1: Hydrology
- HY-2: Water Quality

Comment HY-1: Hydrology

This response addresses the following comment, which is quoted below:

A-Caltrans.5

“Please ensure that any increase in stormwater needs to be treated and contained on the project site to leave no impact to the State Drainage Systems. Also, any floodplain impacts must be documented and mitigated using the most updated Federal Emergency Management Agency (FEMA) information.” (Mark Leong, Caltrans, Email, July 30, 2020)

RESPONSE HY-1

As discussed in EIR Impacts HY-1 and HY-2, project construction and operations activities within the Caltrans right-of-way would be subject to requirements of applicable Caltrans stormwater control requirements. As noted on page 4.10-13, project construction activities in Caltrans jurisdiction would be subject to the agency’s stormwater control requirements. In addition, as discussed on pages 4.10-17 through 4.10-19, the proposed new impervious surfaces within Caltrans right-of-way would be required by the Caltrans statewide permit to incorporate stormwater flow and treatment controls into the project design. The EIR acknowledges the mandatory Caltrans stormwater requirements, compliance with which would protect against substantial adverse effects on the state drainage systems. Through adherence to these and other mandatory regulatory requirements, the EIR concludes the potential effects related to existing drainage patterns and stormwater runoff would be less than significant.

On the issue of floodplains, as noted on page 4.10-10 of the draft EIR, the project site is not located in a 100-year flood zone and, as noted above, with adherence to stormwater drainage control requirements which regulate runoff volumes, the project would not alter drainage patterns to cause significant impacts related to flooding on- or off-site and the impact is less than significant.

Comment HY-2: Water Quality

This response addresses the following comments, which are quoted below:

O-GGAudubon.6, I-Cuviello.2

“4. Water Quality: Trails cause soil damage, erosion, sedimentation, and deposition of garbage and human waste, impacting water quality and ecosystem health

- Erosion/sedimentation: “recreation managers (and regulatory agencies) have observed that trails and associated recreation use tend to elevate sediment levels in adjacent waterways.The sediments that enter into drainages and creeks can have an adverse effect on water quality, thereby endangering plant and animal species in riparian habitats (e.g., federal and /or state listed species such as California red-legged frog, Coho salmon).” (EBRPD, 2011)
- “Water quality/sedimentation control solutions need to begin at the planning and design phases and continue to be monitored after completion of construction (EBRPD, 2011)
- Human waste. The informal trails study found that bathroom stops, party spots, waste dumping, and camps make up 28% of all informal trails. (Van Winkle, 2014)
- Informal trails impact wildlands even when lightly used. A few user passes rapidly affects soil and vegetation in the form of increased compaction, decreased soil moisture, and decreased vegetation (Figure 3). (Van Winkle, 2014)
- The most common observed associations with informal trails are (i) water-related (e.g. creek access) comprising 19% of informal trails and (ii) human waste disposal comprising 29% of all informal trails (for the “human waste” category, this was commonly toilet paper, but could also include: trash, clothing, animal waste bags, or other waste products). (Van Winkle, 2014)
 - So informal trails disproportionately impact water bodies and water quality because litter and human waste is deposited adjacent to them.
 - Even if official trails are located far from creeks and water bodies in order to protect them, recreation users will make trails to water bodies anyway.” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“Horse poop can contain giardia, which if it gets into the reservoir could be disastrous.” (Pat Cuiello, Email, August 8, 2020)

RESPONSE HY-2

As discussed in draft EIR Impact HY-3, beginning on page 4.10-21, project implementation with unsupervised access could adversely affect water quality due to the possibility that visitors could engagement in activities that would not be permitted in the watershed (e.g., off-trail usage, camping, littering, and domestic animal waste). However, as also discussed, the SFPUC proposes project elements which would minimize the potential for adverse effects on water quality, including barbed wire-fencing and lockable gates, trail design that avoids wetland areas, and increased monitoring of trail use and maintenance of trail facilities. The proposed fencing and lockable gates would help limit public access to the trail to daylight hours. Similarly, increased monitoring

and inspection would minimize incidence of unpermitted activities and provide for timely identification and repair of damaged facilities (e.g., unauthorized trails and damaged fencing). Implementation of these project elements would reduce the potential for substantial indirect water quality impacts associated with unpermitted activities that could occur with unsupervised watershed access, including littering, animal wastes, recreating in reservoirs and drainages, and soil erosion from the creation of any informal trails. Therefore, the EIR concludes that water quality impacts of the project would be less than significant.

With respect to potential water quality impacts resulting from any increased equestrian use of the trails, the effects would be negligible due to the distance between the project site and receiving waters. In response to this comment, the text of Impact HY-3 on page 4.10-22 second paragraph is revised as follows:

As discussed for the proposed access program in this EIR's Chapter 2, Project Description, Section 2.7.1, Trail Access Management Program and Visitation, the SFPUC would install barbed-wire fencing and lockable gates along the southern skyline ridge trail. The public could access the trail through these gates for approximately eight hours per day during daylight hours. The SFPUC would ensure that permit holders have completed educational programs that emphasize the importance of protecting water quality. The trail realignment and bridge would avoid the wetlands identified along the southern skyline ridge trail, and SFPUC project operations and maintenance activities would similarly avoid these areas. However, as discussed in Impact HY-2, visitors would be allowed to traverse the drainage that bisects the unimproved portion of the trail alignment. Visitor traffic could cause disturbances to soils and potential siltation, as well as the introduction of animal wastes (e.g., horse manure), when water is present in the drainage. However, because the drainage is seasonal and is located a considerable distance (approximately 1 mile), and the project trails are generally between several hundred and a few thousand feet, from any receiving waters, the potential impact would be less than significant.

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11.8 Hazards

The comments and corresponding response in this section cover the subject included in draft EIR Section 4.11, Hazards and Hazardous Materials. The comment topic relates to:

- HZ-1: Wildfire - Risk, Effects, Management

Comment HZ-1: Wildfire - Risk, Effects, Management

This response addresses the following comments, which are quoted below:

A-CPC-Imperial.1, O-CNPS.3, O-GGAudubons.4, O-Midpen.6, I-Chris-1.4, I-Fox.1, I-Fox.4, I-German.1, I-Oldendorp.3

“Thank you. My comment or my question is -- thank you for the staff for presenting. My question is about whether there is, whether it's also covered in terms of fire prevention or fire protection around-- I'm sure that we're all in particular on this trail, but in terms of assessments of fire prevention. You know, it's California. It's always, you know, (indiscernible) by the fire, so I think if that's something that can be added. Thank you.” (Theresa Imperial, Planning Commission, Hearing Comments, July 23, 2020)

“3) Fire, always a concern, is heightened by climate warming, which is expected to continue and perhaps accelerate, meaning that plants will be consuming more water while water available to them is likely to decline.

4) Catastrophic fire could have devastating consequences for supply and quality of water.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“2. Fire Danger. Unsupervised recreation users will dramatically increase fire risk in the Watershed.

- Federal agencies report that humans ignite 80-90% of all wildland fires. Thus, the introduction of unsupervised humans into a wildland ecosystem can increase the likelihood of ignition 4 to 9 times (see Figure 1, NPS, EcoWest, 2013; Stein et al., 2013). Many of those ignitions are associated with automobiles and other machinery and so would be less likely to occur in the Watershed. However, many are also caused by smoking (tobacco and marijuana), campfires, and fireworks, all of which can and do invariably co-occur with unsupervised recreation.
- The enormous Rim Fire near Hetch Hetchy reservoir was caused by an illegal campfire. As the 2015- 16 rainy season approaches, the reservoir and water supply is once again at risk from landslides and other erosion of burned hillsides (Alexander, 2013). 2014 was a low rainfall year (drought), but 2015 is predicted to possibly produce high rainfall due to El Nino.
- Fire suppression for the Rim fire cost over \$100 million, according to the SF Chronicle. Restoration costs for the Rim Fire run to tens of millions of dollars, \$43 million from FEMA alone, according to the FEMA website.
- The current historic draught has created some of the driest fuel in the history of the Bay Area.

- Studies have found that urbanization has reduced the number of foggy days in southern California. If this is also true in the Bay Area, lack of fog may also exacerbate low fuel moisture. (Williams, et al., 2015)
- Federal data show that human-caused ignitions of wildlands increase as the surrounding population density increases (see graph 2, Stein et al., 2013). The Peninsula is very densely populated.
- Many invasive weeds in the Bay Area are annual grasses and other highly flammable species.
- Climate change has increased fire danger worldwide. A 2015 study (Jolly et al., 2015) in the journal Nature confirms that wildfires worldwide are larger, more numerous, and their season is longer every year; and that it is all a direct consequence of climate change. Hotter and drier conditions, beginning earlier each spring, have over 30 years doubled the area of the planet's surface that is vulnerable to wildfire; and have lengthened by 18% the average length of fire seasons worldwide.
- The Nature study specifically states “If these fire weather changes are coupled with ignition sources and available fuel, they could markedly impact global ecosystems, societies, economies and climate.” (emphasis added) (Jolly et al., 2015).” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“The District supports SFPUC’s mitigation measure to prepare and implement a new fire management plan and requests, as a neighboring land owner, to be consulted during plan preparation. The District is currently preparing a Wildland Fire Resiliency Program (<https://www.openspace.org/our-work/projects/wfrp>) and would like to coordinate with SFPUC on our respective wildland fire management programs.” (Ana Ruiz, Midpeninsula Regional Open Space District, Letter via Email, August 10, 2020)

“c. Would be great to address fire safety issues from the dangerous and invasive Eucalyptus trees and also include some fire evacuation routes for the locals in case Skyline and 92 are not passable due to a fire. A fast moving fire moving like a chimney up the ridge could blow up one of the propane tanks at nearby homes rendering the entire area unpassable – if you have evacuation routes, please let the locals know where they are. Please note that Kings Mountain near Skyline was rated 3rd most dangerous fire area in all of California by Governor Newsom. I don't see too much in the EIR about fire evacuation plans. As you drive west on 92 near 35, you can notice the massive unchecked overgrowth of dangerous Eucalyptus trees on the watershed property. This negatively affects the habitat too. Apparently, there are companies that can use the Eucalyptus trees for products and they are willing to take them off your hands if coordinated well. I hope there is a plan on the Eucalyptus trees.” (Chris, Email, July 18, 2020)

“1) **Fire Risk:** I’m saddened the EIR does not mention the PG&E Utility Power lines running through the project area, and Section 4.11 in the EIR misleads, by using a US based study, not a local California study on fire risk. I personally photographed several tree branches in the Watershed located directly ABOVE utility power lines (see photos attached near HWY 92). Please re-word section 4.11 to clarify or remove this statement: “90% of the fires in the US are started by humans ” Let's be honest, this statement is misleading and not scientifically applicable to the project scope. In California, the vast majority of fires recently have been caused by wind and utility power lines located under falling tree branches, or by campfires at campgrounds where people stay overnight. I would like the EIR to provide a relevant, localized Northern California study, that compares the risk of utility power lines (# of acres burned) vs. human hikers/bikers (# of acres burned) within areas that have 0 campgrounds. This will provide

an unbiased, local result, and likely to help reduce fire risks without overstating the risk from hikers.”
(Jamie Fox, Email, August 10, 2020)

“This simple message is lost in the EIR. The EIR doesn’t even mention the existing utility power lines posing a major fire risk (see photos). “ (Jamie Fox, Email, August 10, 2020)

“If building this trail means that CalTrans right-of-ways and the areas around the trail are better maintained for fire suppression, that would be the major benefit. But if CalTrans continues to ignore the maintenance of their right-of-way (Section 4.11-7), any trail maintenance by the SFPUC would be futile, especially in the event of a fire sparked on Highway 35. Any fuel abatement measures by CalTrans were inadequately completed at least 7 years ago and are long overdue. Another benefit of this amount of fencing and attention is that it might deter any additional illegal marijuana grows. Conflicts between growers, hikers and park rangers should be of concern.” (Carrie German, Email, July 23, 2020)

“Just come up on a sunny weekend and you’ll find over 100 cars along the road. The cars are basically making new parking spots in places where there is not enough space and also over dry grass and downed oak branches which is a fire concern.” (Jason Oldendrop, Email, June 26, 2020)

RESPONSE HZ-1

CLIMATE CHANGE

The effects of climate change and its likely potential to increase wildfire occurrences is acknowledged and discussed in the draft EIR on pages 4.11-12 and 4.11-13. As noted in the EIR, warmer and drier conditions may ultimately lead to earlier and thus a longer fire season. Alternatively, increased vegetation growth from wetter climates might also increase fuels and thus increase seasonal wildfire fire intensity and overall hazard risk. As stated in the draft EIR on page 4.11-13, “research suggests that large fires and burned acreage will increase throughout this century, with some declines after mid-century due to vegetation type conversions.” Neither the project nor variants would emit greenhouse gas emissions at a level that could result in a significant impact on the global climate, including its potential to increase wildfire occurrences (p. 4.7-9). However, as discussed under Impact HZ-8, unsupervised access would increase wildfire hazards, as many wildfires result from humans engaging in activities that would not be permitted in the watershed under the project (e.g., smoking, use of cooking stoves, campfires, and unauthorized off-trail use). Therefore, the EIR considers the project’s implications for wildfire hazards, in the context of climate change, and concludes the potential wildfire hazard risk with unsupervised access would be significant.

To minimize the identified risk, the EIR identifies Mitigation Measure M-HZ-8 which would provide for the development and implementation of a new fire management plan, in coordination with CalFire (see Section 4.11.1.3, *Wildfires, Peninsula Watershed Fire Management Element*). The fire management plan would include project-relevant and specific fire defense improvement actions, fuel management actions, and fire response actions from the Peninsula Watershed Management Plan. Implementation of these measures prior to and during project operation would substantially reduce the risk of fire and, while not entirely eliminating the potential for wildfires to occur, they would be effective in reducing the fire hazard risk. In addition, as stated on

11. Responses to Comments

11.8 Hazards

page 4.11-28 of the draft EIR, the new fire management plan called for under Mitigation Measure M-HZ-8 would require that the identified fire management element actions be based on site-specific conditions, with consideration for the potential effects of climate change. Therefore, implementation of Mitigation Measure M-HZ-8 would reduce the potential of wildfire risks including those due to the effects of climate change to less-than-significant levels by improving fire hazard conditions compared to present day conditions.

CAUSE OF WILDFIRES

Wildfires can be caused by naturally occurring events such as lightning or by human activities such as campfires, fireworks, smoking, or ignition from gas-fired engines. As noted on page 4.11-28 of the draft EIR, unsupervised public use of new trails would increase the potential for people to engage in unpermitted activities, which could increase fire hazards. Page 4.11-30 of the draft EIR also acknowledges that due to the severity of fire hazard conditions in the vicinity of the project area, even a small number of visitors engaging in prohibited activities could have substantial adverse effects related to wildfire risk. As the comments above note, in recent years devastating wildfires have also been attributed to electrical transmission line issues. According to estimates by the California Public Utilities Commission, 10 percent of wildfires are associated with electrical transmission lines, many of which relate to vegetation management.¹ Nonetheless, with unsupervised access, the wildfire risk would be expected to increase. Because of the current conditions, which include vegetation types considered to have a high fire potential (e.g., chaparral, grassland, brush, and conifer or eucalyptus tree stands as noted on page 4.11-3 of the draft EIR), and areas of high fire risk in the vicinity of the proposed trail improvements, the EIR concludes the increase in wildfire risk would be significant.

As noted in the draft EIR on page 4.11-11, the Peninsula Watershed Management Plan includes fire management actions such as the fuel management plan which is an ongoing annual management plan that contains recommendations to reduce sources of ignitions, minimize the spread of fires, reduce fire intensity, and reduce the potential for depositing embers into unburned areas. The fuel management plan identifies standards (referred to as treatment prescriptions) for management of specific vegetation types (e.g., eucalyptus trees) in the watershed that have been reviewed and adopted by the cities of Berkeley, Oakland, and Piedmont; East Bay Municipal Utility District; East Bay Regional Park District; University of California; Lawrence Berkeley Laboratory; and Pacific Gas and Electric Company. As stated on page 4.11-28 of the draft EIR, implementation of Mitigation Measure M-HZ-8 would substantially reduce the risk of fire by requiring the development and implementation of a new fire management plan, in coordination with CalFire, with specific fire defense and fuel management plan recommendations, as well as other measures designed to reduce overall wildfire risk. These measures would consider all potential sources and include preventative measures such as fuel reduction through vegetative management measures.

The presence of electrical transmission lines is part of existing conditions and would not be altered by the proposed access program or variants. The potential for these electrical transmission lines to be an ignition source is acknowledged; however, vegetation management could improve conditions by reducing wildfire potential. Vegetation management would be included as part of the new fire management plan required under Mitigation Measure M-HZ-8 and would further the ongoing improvements to fire hazard conditions compared to existing conditions. The plan would also include vegetation management measures that address roadside vegetation control to reduce the potential for wildfires due to ignition from unauthorized roadside parking.

¹ California Public Utilities Commission, 2020. Public Safety Power Shutoff (PSPS) / De-Energization. Available at: <https://www.cpuc.ca.gov/deenergization/>, accessed March 10, 2021.

The inclusion of coordination with CalFire would help ensure that the latest fire prevention and fire response measures are included in the new fire management plan. The EIR concludes implementation of these management measures would reduce potential impacts related to wildfires to less-than-significant levels.

SECONDARY EFFECTS (WATER SUPPLY AND WATER QUALITY) FROM WILDFIRES

As discussed above, the project area includes areas of high risk for wildfires under existing conditions, and the risk of wildfires could increase under the project with unsupervised trail access (p.4.11-30). Secondary effects of wildfire, such as the loss of vegetation resulting in increased soil erosion potential, could have temporary adverse effects on water quality. Wildfires can also strain water supplies, especially in times of drought, when used for fire suppression. However, as discussed in Section 4.10, Hydrology and Water Quality, of the draft EIR (pp. 4.10-22 through 4.10-24); with unsupervised access, the SFPUC would undertake additional security measures and increased monitoring and maintenance to minimize incidence of unpermitted activities in the watershed, including fires, which would reduce associated risk of indirect water quality effects. In addition, as noted above, the implementation of Mitigation Measure M-HZ-8 would reduce the wildfire hazards by providing preventative measures (e.g., establishing fire breaks, reducing fuel loads, increasing access, and increasing water sources for fire suppression). Therefore, while wildfire risks cannot be entirely eliminated, the EIR concludes implementation of proposed security and maintenance measures, along with a new fire management plan as required by Mitigation Measure M-HZ-8, would be effective in reducing the potential for wildfires, and associated secondary effects on water supply and water quality, to less-than-significant levels.

EVACUATION AND EGRESS CONCERNS

The draft EIR addresses in Impact HZ-7 (p. 4.11-26) whether the project would impair or physically interfere with an adopted emergency response plan. The analysis explains the project would not permanently change the existing or planned transportation network, nor would it permanently affect emergency access on area roadways. Therefore, the EIR concludes project operation would not conflict with an adopted emergency response or evacuation plan, and this impact would be less than significant. The EIR refers the reader to Impact HZ-8 for discussion of the project's potential effects on emergency response related to wildfire.

As noted above, Impact HZ-8 evaluates the project's potential wildfire hazard risk, concludes that project construction and operations (with unsupervised access) could result in significant impacts, and identifies mitigation to reduce or avoid those impacts. As also discussed, Mitigation Measure M-HZ-8 calls for development and implementation of a new fire management plan which would include Peninsula Watershed Management Plan fire response actions, as detailed in EIR Appendix E. For example, actions fir11 and fir12 outline fire response preparations and actions in the event evacuations are necessary, including emergency contacts and notifications, establishment of an incident command system, and other measures. With implementation of Mitigation Measure M-HZ-8, the EIR concludes the effects of project operations on wildfire hazard risk would be less than significant with mitigation.

As discussed in Section 4.4, Transportation and Circulation, the proposed access program and variants would not permanently change the existing or planned transportation network, nor would they permanently affect emergency access on area roadways. Therefore, considering the required implementation of a new fire management plan under M-HZ-8, and no changes to the existing road network, the EIR concludes the project would have a less-than-significant impact related to emergency evacuation and egress.

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11.9 Public Services

The comment and corresponding response in this section covers the subject included in draft EIR Section 4.13, Topics Not Requiring Detailed Analysis, and specifically concerning the subsection on public services. The comment subtopic relates to:

- PS-1: Emergency Services

Comment PS-1: Emergency Services

This response addresses the following comment, which is quoted below:

I-German.7

"Kings Mountain Volunteer Fire Department bears the brunt of emergency responses in this area and are generally the first responders before the CHP, Sheriff's Office, Midpeninsula Open Space rangers and CalFire. The added public use and complicated access would be an additional burden on the volunteers and could hinder recruitment and retainment efforts." (Carrie German, Email, July 23, 2020)

RESPONSE PS-1

The California Environmental Quality Act is concerned with a project's potential physical effects on the environment. In the context of emergency services, the primary focus of the analysis is not whether a project would increase the demand for emergency services, but whether an increased demand in emergency services would require new or expanded facilities that could result in physical environmental effects. As explained in the draft EIR Section 4.13.7, Public Services, the establishment of new trails and amenities, along with expanded public access, would not have a significant impact on public services such that a new or altered government facility would be required (p. 4.13-5). However, in response to the comment, the text on EIR page 4.13-5 is revised as follows to clarify the potential effects related to emergency services:

The management plan EIR concludes that the establishment of new trails and amenities, along with expanded public access, would not have a significant impact on public services.¹⁰ Increased visitor use along watershed trails under the proposed project would be expected to result in an increase in demand for emergency services. There are few studies that have examined the relationship between outdoor recreation and emergency service calls in California or the broader United States. However, incident data from the Midpeninsula Regional Open Space District is available. Considering the proximity of district lands, recreational trails provided, and types of trail use allowed, the data are relevant and considered representative of the emergency response incidence that would be expected under the project.

The district manages approximately 63,000 acres of open space lands, which host approximately 245 miles of multi-modal access trail (i.e., hikers, bicyclists, equestrians), and receive approximately 2 million visitors per year.^{10a,10b} The district property nearest the project site is the Purisima Redwood Creek Open Space Preserve, located adjacent to the peninsula watershed, opposite S.R. 35 from the

terminus of the proposed southern skyline ridge trail. District properties are patrolled by district rangers, who possess law enforcement, fire suppression, and emergency medical response capabilities, and work in coordination with state, regional, and local emergency services agencies.

The district's 2015 Field Enforcement Activity Report and Ten-Year Field Activity Summary (the most recent available), indicates that district rangers responded to 66 accidents and medical incidents district-wide in 2015.^{10c} Among these, seven were within the Purisima Redwood Creek Open Space Preserve, which is above the 10-year average of just over four for this preserve. Of the seven incidents in 2015, six involved a response by San Mateo County Fire, two of which also included a response by Kings Mountain Fire Brigade. During this period, district rangers also responded to 14 fire incidents district-wide, nine of which were on district lands, and none of which were at Purisima Redwood Creek Open Space Preserve. The report notes that fire incidents on district lands were mostly extinguished fire rings.^{10d,10e}

Under the proposed project, annual watershed visitation could increase to between 25,000 and 50,000 visitors per year. As explained in Chapter 2, Project Description (page 2-35), SFPUC staff, which are trained in fire suppression and emergency medical response capabilities, would be onsite and continue to conduct regular patrols, the level of which would increase depending upon the access program selected. Accordingly, SFPUC watershed staff would likely be the first responders in the event of an emergency, and would work with state, regional, and local emergency services agencies as needed. As the required emergency response times in San Mateo County are lower for paramedic fire than for ambulance responders, regional and local fire department personnel would likely respond first in the event of an emergency within the project area.^{10f} Under the San Mateo County's emergency response system, the closest fire engine and ambulance is dispatched to every medical incident, regardless of the local fire agency boundaries.^{10g}

The King's Mountain Fire Brigade Station 56 is located approximately 1 mile south of the southern terminus of the proposed 6-mile-long southern skyline ridge trail, and is the station closest to the approximately 14 linear miles of existing and proposed trails that are the subject of the EIR. However, there are also several other county fire stations in proximity to, and in some cases closer to other segments of, the project trails. These include San Mateo County Fire Station 17, located approximately 4.8 miles from the project site; San Mateo County Fire Station 27, located approximately 4.9 miles from the project site; and Central County Fire Station 33, located approximately 6 miles from the project site, among others within 7 miles of the project site.

Based upon emergency response data from the Midpeninsula Regional Open Space District, the number of project-related incidents requiring emergency services is not expected to be substantial (i.e., about three to five per year). In the event of an emergency, SFPUC staff would serve as first responders, aided by state, regional, and local first responders, as needed. Considering the small number of incidents expected, the county's approach to emergency response dispatch, and the number of fire departments in proximity to the project area, the project would not be expected to have a substantial adverse effect on regional emergency services providers, nor a disproportionate burden on any individual provider. For these reasons, and given ~~The the~~ project is not expected to cause an increase in population, ~~and therefore would be no substantial effect on~~ ~~not significantly affect~~ service ratios, response times, or other performance objectives for public services such that a new or altered governmental facility would be required.

The Bay Area Ridge Trail provides a recreational public service. Sections 4.2 through 4.12 of this EIR address the potentially significant impacts of this trail extension project for each related environmental topic. For example, Section 4.11, Hazards and Hazardous Materials, evaluates the potential fire risk during construction and the adverse effects associated with increased public access within the watershed.

¹⁰ San Francisco Planning Department, *Peninsula Watershed Management Plan Final Environmental Impact Report*, Section III.K and V.K, Utilities and Public Services (pp. III.K-1 through III.K-7, and V-41).

^{10a} Midpeninsula Regional Open Space District, 2020, Brochure and Map. Available at: https://www.openspace.org/sites/default/files/district_map.pdf; accessed March 10, 2021.

^{10b} Midpeninsula Regional Open Space District, 2015. Annual Update 2014/2015. Available at: https://www.openspace.org/sites/default/files/AR_14-15.pdf; accessed March 10, 2021.

^{10c} Accidents and medical incidents include hiking, bicycling, equestrian and other medical responses such as motor vehicle accidents and other medical events.

^{10d} Midpeninsula Regional Open Space District. 2015. Calendar Year 2015 Field Enforcement Activity Report and Ten-Year Field Activity Summary. March 23, 2015.

^{10e} Midpeninsula Regional Open Space District. 2021. Email correspondence between Elijah Davidian (ESA) and Deborah Bazar (MidPen) re: Southern Skyline Ridge Trail Project - MidPen/Purisima Enforcement Activities Report.

^{10f} San Mateo County. 2017. System Overview Report – San Mateo County Emergency Medical Services, FY 2016-2017. Available online at: https://www.smchealth.org/sites/main/files/file-attachments/ems_system_overview_report_2016-17_1.pdf?1520536224, accessed March 10, 2021.

^{10g} San Mateo County, 2020. Emergency Medical Services - General Information. Available at: <https://www.smchealth.org/ems/background>; accessed on March 10, 2021.

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11.10 Alternatives

The comments and corresponding responses in this section cover the subjects included in draft EIR Chapter 6, Alternatives. The comment topics related to:

- AL-1: Adequacy of Alternatives
- AL-2: Analysis of Impacts

Comment AL-1: Adequacy of Alternatives

INDIVIDUAL COMMENTS

This response addresses the following individual comments, which are quoted below:

O-BARTC-1.1, O-BARTC-1.4, O-BARTC-2.2, O-Midpen.3, O-SVMB.2, I-Brousseau-3.1, I-Fuad.2, I-Kenin-1.2, I-Kitto.2, I-Mackey.2, I-Molitor-1.3, I-Molitor-1.5, I-Molitor-3.3, I-Polacco.2, I-Romano.3, I-Ruby_J.3, I-Ycasas.2

“The Council supports the proposed project and access program as defined in the DEIR. No other project alternative achieves the stated project objectives as they relate to the Ridge Trail (Section 2.4.2, Project Objectives #3-5), nor would they fulfill the Ridge Trail mission to create a continuous trail, for all users, that encircles San Francisco Bay. “(Janet McBride, Bay Area Ridge Trail Council, Letter, August 7, 2020)

“Second, Table 6-2 identifies which project alternatives meet or partially meet the project objectives as outlined in Section 2.4.2, Project Objectives. Three of the five project objectives, Objectives #3, 4, and 5, address the Ridge Trail mission specifically. The Council respectfully disagrees with the DEIR’s conclusion that Project Alternative B partially meets Objective #3 and #5. The proposed project trail route is the only route documented by the DEIR which will allow the Ridge Trail to connect to adjacent sections. Alternative B does not meet Project Objective #3: to extend the Bay Area Ridge Trail south from S.R. 92 to the Phleger Estate. Furthermore, the Ridge Trail mission is to be fully multi-use, for hikers, bikers and equestrians, and this alternative excludes (and does not provide an alternate route for) cyclists. For these reasons, Alternative B fails to meet Objectives #3 and 5, related to connectivity and multi-use.” (Janet McBride, Bay Area Ridge Trail Council, Letter, August 7, 2020)

“We do not support any of the project alternatives, as they do not achieve the stated project goals, nor the Ridge Trail’s mission for a continuous trail for all users.” (Liz Westbrook, Bay Area Ridge Trail Council, Planning Commission, Hearing Comments, July 23, 2020)

“The District has also reviewed the Project Draft EIR Alternatives and are concerned that the alternatives do not sufficiently fulfill Project Objectives 3 and 5 of extending the Ridge Trail south from Highway 92 to the Phleger Estate, or support the Bay Area Ridge Trail Council’s goal of creating a continuous multi-modal

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(pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay.” (Ana Ruiz, Midpeninsula Regional Open Space District, Email, August 10, 2020)

“However, none of the project alternatives achieve the stated project goals, nor the Bay Area Ridge Trail’s mission to create a continuous trail, for all users, that encircles San Francisco Bay.” (Sean McKenna, Silicon Valley Mountain Bikers, Email, August 10, 2020)

“The Alternative D: Alternative Trail Alignment is not acceptable as a replacement to the primary proposed route, because it would not result in creation of a southern skyline ridge trail. As noted in the EIR, Alternative D would not meet either Objective 3 (extend the Bay Area Ridge Trail south from S.R. 92 to the Phleger Estate) or Objective 4 (improve the existing Fifield-Cahill ridge trail to enhance access). Alternative D would be a nice addition to the project but is clearly not a replacement alternative for the project.” (Christopher Brousseau, Email, August 9, 2020)

“I don't believe the project alternatives achieve the project goals, nor do they fulfill the mission of the Ridge Trail.” (Michael Fuad, Email, August 8, 2020)

“The alternatives would not achieve those goals.” (Alexandra Kenin, Email, August 8, 2020)

“The alternatives would not achieve those goals.” (Patrick Kitto, Email, August 5, 2020)

“The trail also benefits many other users. The project alternatives would not achieve those goals.” (Theral Mackey, Email, August 6, 2020)

"3. A major concern with any of the proposals is figuring out a way to cross Highway 92. I believe that since none of the current proposals seem to actually solve this problem that a new alternative should be explored that the DEIR simply does not address. I suggest creating a short trail from the Skyline quarry parking (off of the branch from Fifield-Cahill) along the north side of 92 down to the existing traffic light at the reservoir where 35 meets 92 (two miles east of Skylawn). This would utilize an existing signal light to allow trail users to safely cross the highway. From there the trail could come back up the southern side of 92 only a short distance to the gated entrance to Old Canada Road on the west side of the reservoir and then connect to the Pulgas Water Temple at the southern end of the reservoir. Or the trail could simply follow the roadway on the eastern side (or both).

I submit that this option should be investigated for several reasons:

1. existing maintenance roads are on relatively flat terrain, meaning the environmental impact & construction costs should be far lower
2. there is plenty of room for wide trails to allow for social distancing
3. the Water Temple has a parking lot, water bottle station, and restroom facilities

4. it would be very easy to use Canada Road to bypass the Filoli property (if easement on Old Canada is too difficult to negotiate) and still connect with the Phleger Estate trails right where they come down at the terminus of Edgewood Road.
5. It would allow for a continuation of the ridge trail rather than an abrupt end at the cemetery.
6. It would allow connection to the Sawyer Camp Trail and provide a loop around the northern reservoir
7. It would also prevent shifting additional traffic and parking difficulties to the already overloaded Skyline corridor and the residents who live there.
8. It would not only fulfill the primary goal of completing a contiguous trail around the bay, but would still provide plenty of easy-access education opportunities
9. It would provide easy access for the pedestrians and cyclists that participate in the unday closures of Canada Road (bicycle Sunday).“ (Jerry Molitor, Email, August 10, 2020)

"Considering that the Fifield-Cahill trail & southern connection into the existing trail system will be a highly anticipated addition, I urge SFPUC to consider providing trails alongside the western side of the reservoirs to allow for a complete connection into that trail system. I believe it will be far less impactful to the environment and residential community of Kings Mountain, much easier to implement, and cost much less than having to reform the mountainous terrain.“ (Jerry Molitor, Email, August 10, 2020)

“My biggest recommendation is that I actually see an inadequacy where there is an alternative that has not been explored yet, where there would be a short trail going through the quarry parking lot to the existing traffic light at the reservoir where 35 meets 92. From there, the trail could either come around Old King out on the west side of the reservoir, or simply follow the roadway on the eastern side. This option should be investigated because there are existing maintenance roads on relative flat terrain, meaning an environmental impact and construction costs that are far lower, plenty of room for wide trails for social distancing. It could end at the Water Temple, which has a parking lot, water bottle station and restroom facilities. It could be easily connected to Cañada road to bypass Filoli if an easement is a concern, and still connect with the Phleger Estate trails, which would allow for the continuation of the Ridge Trail, and allow for crossing of Highway 92.” (Jerry Molitor, Planning Commission, Hearing Comments, July 23, 2020)

“SAFETY: A skyline boulevard trail would be a safe alternative for cyclists, such as myself, who might otherwise travel along Hwy 35 to access Purisima Creek Redwoods and other existing open space. Shortening the trail for safety (as is proposed in one section of the EIR) is counter-productive for cyclists' safety. Similarly, opening the quarry road to connections from 92 is a safer alternative to cycling 92, which many cyclists do these days. Closing or shortening trails because our roads are unsafe is “fixing” the wrong problem.” (Ben Polacco, Email, August 10, 2020)

“So, we have no choice except to support the staff recommended project and access program, as alternatives don't support a the Ridge Trail, continuous, for all users, that will hopefully encircle San Francisco Bay in some future time” (Christina Romano and Bruce Pucket, Email, August 8, 2020)

“The north part of the Watershed (Fifield-Cahill Ridge) is currently accessible to the public. You can book a free, docent-led hike throughout the year. Granted these hikes are at the other end of the Watershed

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going towards Sweeney Ridge, but there are definitely opportunities that already exist to see this lovely area. What is remarkable is how few people bother to schedule these hikes or even show up when they do sign up. The question is do they plan to make this new trail at the south end of the Watershed decent led and subsequently reduce the impact of many cars and people impacting this dense area? There is more than adequate parking at the Cemetery that is already being used for parking for hikes in the Watershed to the north. Which brings up the suggestion described below by one of our neighbors:

- A new alternative path, going from Fifield--Cahill Ridge (behind Skylawn Cemetery) down to Skyline Quarry and then continuing down to the light to allow for safe crossing of 92. At this point, the trail could use the current maintenance roads/trails on the western side of the southern reservoir and simply connect to the Pulgas Water Temple (and all of the amenities therein). Additionally, the trail could then connect further south to the Phleger Estate using existing trails that come off of the Edgewood Road terminus.

As noted above, trails/dirt roads already exist for this lower part of the Watershed by Crystal Springs and would have far less impact and cost a lot less money than developing an entirely new trail and parking lot on Skyline. Routing people to the top of the mountain where the impact is already immense and has several Mid-Pen Open Space parks available makes no sense. This alternative plan would avoid increasing the speeding and unsafe pedestrian traffic on Skyline/Highway 35 which is definitely a serious issue on the weekends in particular and weekdays in general due to the parks that already exist.” (Jan Adair Ruby, Email, August 10, 2020)

“The best option, I believe, is the staff-recommended project and access program, rather than the alternatives, which fall short of meeting the stated project goals.” (Joyce Ycasas, Email, July 23, 2020)

This response also addresses the following comments, which are similar or identical to the representative comment quoted below:

AL-1 REPRESENTATIVE COMMENT 1

I-Alcorn.2, I-Allen.2, I-Anagnoson.2, I-Arbizu.2, I-Arena.2, I-Arnold_T.2, I-Basin.2, I-Bernstein.2, I-Bigbee.2, I-Black.2, I-Blockstein.2, I-Boltin.2, I-Borelli.2, I-Bridgeman.2.2, I-Bushue.2, I-Camerlengo.2, I-Carroll.2, I-Carter.2.2, I-Case.2, I-Chase.2, I-Chen.2, I-Clarke.2, I-Cooper.2, I-Crater.2, I-Cuff.2, I-Dat.2, I-Dell.2, I-Deutscher.2, I-Dickstein.2, I-Eberle.2, I-Eichel.2, I-Enevoldsen.2, I-Enns.2, I-Esteban.2, I-Fong.2, I-Forter.2, I-Garcia.2, I-Gilmore.2, I-Gipp.2, I-Golembiewski.2, I-Gonzales.2, I-Greene.2, I-Hall_B.2, I-Hall-Snyder.2, I-Harvey.2, I-Heitkamp.2, I-Heyden.2, I-Hoffman.2, I-Huang.2, I-Janson.2, I-Key.2, I-Krensky.2, I-Kropp.2, I-Kunz.2, I-Lee_D.2, I-Lehane.2, I-Lesher.2, I-Lider.2.2, I-Long.2, I-Luke.2, I-Lunders.2, I-MacDonald.2, I-Martin_N.2, IMartin_K.2, I-Mercay.2, I-Mitchell.2, I-Morse.2, I-Mui.2, I-Nauchury.2, I-Neufeld.2, I-Paley.2, I-Paulsen.2, I-Quinn.2, I-Reddig.2, I-Rhodes.2, I-Ries.2, I-Rivera.2, I-Rogers.2, I-Rosenblatt.2, I-Rosenthal.2, I-Rosoff.2, I-Scareborough.2, I-Self.2, I-Shukis.2, I-Shuler.2, I-Shute.2, I-Simnett.2, I-Slezak.2, I-Smith_A.2, I-Smoot.2, I-Sontag.2, I-Stanke.2, I-Stern.2, I-Strahorn.2, I-Swanson.2, I-Switzer.2, I-Taylor_W.2, I-Taylor_K.2, I-Tepedelenlioglu.2, I-Towey.2, I-Upp.2, I-Vaughan.2, I-Wegner.2, I-Weil.2, I-Wild.2, I-Wilson.2, I-Winsor.2, I-Wisniewski.2, I-Woodward.2, I-Wynne.2, I-Young.2

“None of the project alternatives achieve the stated project goals, nor the Ridge Trail mission to create a continuous trail, for all users, that encircles San Francisco Bay.” (Susan Alcorn, Email, August 4, 2020; Scott Allen, Email, August 10, 2020; Rob Anagnoson, Email, August 9, 2020; Margarita Arbizu, Email, August 5,

2020; Chris Arena, Email, August 9, 2020; Tom Arnold, Email, August 5, 2020; Cheryl Basin, Email, August 6, 2020; Max Bernstein, Email, August 10, 2020; Paul Bigbee, Email, August 6, 2020; Carlin Black, Email, August 4, 2020; Sue Blockstein, Email, August 2, 2020; Iain Boltin, Email, August 4, 2020; Beverley Borelli, Email, August 4, 2020; Carole Bridgeman, Email, August 9, 2020; Mike Bushue, Email, August 7, 2020; Judy Camerlengo, Email, August 5, 2020; Jessica Carroll, Email, August 9, 2020; Jonathan Carter, Email, August 4, 2020; Sarah Case, Email, August 6, 2020; Laurie Chase, Email, August 5, 2020; Mich Chen, Email, August 4, 2020; James Clarke, Email, August 6, 2020; Cameron Cooper, Email, August 9, 2020; Kermit Cuff, Email, July 23, 2020; Ted Dat, Email, August 7, 2020; Stephen Dell, Email, August 5, 2020; Kathy Deutscher, Email, August 5, 2020; Leah Dickstein, Email, August 10, 2020; Stefan Eberle, Email, August 7, 2020; Kelsie Eichel, Email, August 4, 2020; Claus Enevoldsen, Email, August 4, 2020; Steven Enns, Email, August 5, 2020; Gregory Esteban, Email, August 5, 2020; Norman Fong, Email, August 9, 2020; John Forter, Email, August 4, 2020; Carlos Garcia, Email, August 6, 2020; Meg Gilmore, Email, July 23, 2020; Nicole Gipp, Email, August 9, 2020; Mark Golembiewski, Email, August 4, 2020; Robert Gonzales, Email, August 4, 2020; Thomas Greene, Email, August 6, 2020; Brad Hall, Email, August 5, 2020; Nathan Hall-Snyder, Email, August 10, 2020; Sean Harvey, Email, August 4, 2020; Ross Heitkamp, Email, August 8, 2020; Neil Heyden, Email, August 4, 2020; Dan Hoffman, Email, August 4, 2020; Kathy Huang, Email, August 5, 2020; Nils Janson, Email, August 8, 2020; Charles Key, Email, August 6, 2020; Rob Krensky, Email, August 4, 2020; Mason Kropp, Email, August 4, 2020; John Kunz, Email, August 4, 2020; Donovan Lee, Email, August 7, 2020; Michael Lehane, Email, August 10, 2020; Ted Leshner, Email, August 9, 2020; Brett Lider, Email, August 7, 2020; Warren Long, Email, August 5, 2020; Lawrence Luke, Email, August 5, 2020; Ken Lunders, Email, July 23, 2020; Scott MacDonald, Email, August 9, 2020; Kurt Martin, Email, August 10, 2020; Nancy Martin, Email, August 4, 2020; Julien Mercay, Email, August 7, 2020; Marc Mitchell, Email, August 6, 2020; Joe Morse, Email, August 5, 2020; Andrew Mui, Email, August 4, 2020; Maxence Nachury, Email, August 4, 2020; Jan Neufeld, Email, August 5, 2020; Daniel Paley, Email, August 4, 2020; David Paulsen, Email, August 4, 2020; Adda Quinn, Email, August 7, 2020; Randy Reddig, Email, August 9, 2020; Karen, Rhodes, Email, August 10, 2020; Paul Ries, Email, August 10, 2020; Joe Rivera, Email, July 23, 2020; Brian Rogers, Email, August 5, 2020; Bettina Rosenblatt, Email, August 8, 2020; Cindy Rosenthal, Email, August 4, 2020; John Rosoff, Email, August 9, 2020; Robert Scarborough, Email, August 4, 2020; Matthew Self, Email, August 4, 2020; Warren Shukis, Email, August 4, 2020; Jay Shuler, Email, August 7, 2020; Jeff Schute, Email, August 8, 2020; Sarah Simnett, Email, August 10, 2020; Doug Slezak, Email, August 6, 2020; Alan Smith, Email, August 5, 2020; Steve Smoot, Email, August 5, 2020; Carol Sontag, Email, July 23, 2020; Fred Stanke, Email, August 4, 2020; Kathleen Stern, Email, August 4, 2020; Chris Strahorn, Email, August 8, 2020; Stacey Swanson, Email, August 4, 2020; Cathy Switzer, Email, August 8, 2020; Kent Taylor, Email, August 4, 2020; Warrick Taylor, Email, August 5, 2020; Emre Tepedelenlioglu, Email, August 9, 2020; David Towey, Email, August 10, 2020; Rex Upp, Email, August 4, 2020; Brandon Vaughan, Email, August 10, 2020; Glenn and Linda Wegner, Email, August 8, 2020; Nina Weil, Email, August 5, 2020; Lani Wild, Email, August 5, 2020; Bryan Wilson, Email, August 4, 2020; Charity Winsor, Email, August 4, 2020; Damian Wisniewski, Email, August 10, 2020; Ted Woodward, Email, August 10, 2020; Sara Wynne, Email, August 4, 2020; Neil Young, Email, August 10, 2020)

RESPONSE AL-1

The comments identified generally concern whether the alternatives analyzed in the EIR would fulfil the stated project objectives, and whether the EIR considers a reasonable range of alternatives. Each is addressed under corresponding subheadings within this response. In summary, and as explained further in the subsections that follow, the planning department respectfully disagrees with the commenters' assertions that the alternatives evaluated fail to meet the project objectives sufficiently and that additional alternatives should be evaluated.

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CEQA Guidelines section 15126.6(a) provides that “An EIR shall describe a range of reasonable alternatives to the project, or location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” Draft EIR Section 6.2, Alternatives Selection (pp. 6-2 to 6-6), provides a discussion of the alternatives selection process that was used to identify the range of alternatives analyzed in the EIR in compliance with CEQA guidelines section 15126.6. As discussed in Section 6.2, the planning department identified six alternatives concepts with potential to meet the basic project objectives and lessen significant impacts identified for the project (pp. 6-7 and 6-8). Three concepts were rejected due to feasibility or inability to substantially lessen significant project effects. The remaining three concepts were further developed and analyzed. The analysis in Section 6.3 (pp. 6-9 through 6-34) concludes the alternatives carried forward would be feasible, avoid or substantially lessen project impacts, and meet most of the basic project objectives.

ATTAINMENT OF BASIC PROJECT OBJECTIVES

Several of the comments presented state that none of the project alternatives achieve the project goals, nor the Ridge Trail mission to create a continuous trail, for all users, that encircles the San Francisco Bay. As explained above, CEQA requires the consideration of alternatives that meet “most of the basic objectives of the project.” The SFPUC has identified five project objectives, presented in Section 6.1.2; none of the objectives were identified as being more critical than others. One of the five project objectives concerns supporting the Bay Area Ridge Trail Council’s goal of creating a continuous, multi-modal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay (objective 5). The ability of the alternatives evaluated to meet most of the basic project objectives was a primary consideration in the selection of alternatives to be carried forward for detailed analysis in the EIR. The analysis of the alternatives’ ability to meet the project objectives is presented for each alternative in Section 6.3, and summarized in Table 6-2.

Comments O-BARTC-1.1, O-BARTC-1.4, O-Midpen.3, express disagreement with the EIR’s conclusion that Alternative B partially meets objective 3 and objective 5. The rationale for the EIR’s conclusion is presented on page 6-21 and explains that:

Since Alternative B would not extend south from S.R. 92 but would begin approximately 1.5 miles south of S.R. 92 and continue south to the Phleger Estate, this alternative would not fully meet project objective 3, which is to “extend the Bay Area Ridge Trail south from S.R. 92 to the Golden Gate National Recreation Area’s Phleger Estate.” However, as Alternative B would add 4.5 miles of ridge trail between existing nearby ridge trail segments to the north and south, and because the 1.5-mile trail gap could be completed in the future when additional funding is available for a designated S.R. 92 crossing, this alternative would partially meet project objective 3. For the same reasons described for project objective 3, and because it would allow multi-modal access (pedestrian, bicycle, and equestrian) on the southern skyline ridge trail, Alternative B would partially meet project objective 5, which is to “support the Bay Area Ridge Trail Council’s goal of creating a continuous multi-modal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay.”

The planning department appreciates the commenters’ perspectives. However, the EIR’s conclusions for Alternative B comply with the requirements of CEQA. As noted previously, pursuant to CEQA Guidelines section 15126.6(a), an EIR shall describe a range of alternatives that would feasibly attain most of the basic project objectives. As discussed in Section 6.3.2, and summarized in Table 6-2, Alternative B would fully meet objectives 1, 2, and 4, and partially meet objectives 3 and 5. For these reasons, the alternative meets most of the basic project objectives.

ADDITIONAL ALTERNATIVES CONCEPTS

The commenter I-Molitor-1.3, I-Molitor-1.5, I-Molitor-3.3, I-Polacco.2, and I-Ruby_J.3 identify additional alternatives concepts and request they be considered in the EIR. As noted above, CEQA does not require that all conceivable alternatives to a proposed project be evaluated. The EIR describes a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen its significant effects. Nevertheless, solely for informational purposes, and for the benefit of the commenters and the decision-makers, each additional proposal suggested by the commenters listed above is briefly considered in relation to criteria set forth in CEQA Guidelines Section 15126.6(a) and the alternatives analyzed in the EIR.

ALTERNATIVE TRAIL ALIGNMENT (VIA SKYLINE QUARRY AND OLD CAÑADA ROAD)

Comments I-Molitor-1.3, I-Molitor-1.5, I-Molitor-3.3, and I-Ruby-J.3 propose an alternative trail alignment that would not involve a new southern skyline ridge trail. Instead, the comments suggest extending access along the Fifield-Cahill ridge trail from Cemetery Gate to Skyline Quarry. From Skyline Quarry Road, the commenters propose constructing a new trail extending east along the north side of S.R. 92 to its intersection with S.R. 35 (north), providing a crossing of S.R. 92 at the existing S.R. 35/S.R. 92 signalized intersection, and continuing the trail south along the west side of Upper Crystal Springs Reservoir (along Old Canada Road) to a point of connection with the Phleger Estate.

This alternative concept is similar to the EIR's Alternative D, which includes an alternative trail alignment along the east side of Upper Crystal Springs Reservoir, connecting to the Phleger Estate. Upon initial review, the proposal appears to meet the basic project objectives. However, the concept would retain the significant unavoidable effects identified for the project along Fifield-Cahill ridge trail (i.e., unsupervised access effects on San Francisco garter snake and California red-legged frog, trampling of host plants for the Mission Blue butterfly or San Bruno elfin butterfly, and accelerated spread of plant pathogens).

The commenters' proposal would eliminate the need for a designated crossing of the S.R. 35 (south)/S.R. 92 intersection. However, a new crossing of the S.R. 35 (north)/S.R. 92 would be required, as no crosswalk currently exists at that location. As discussed for Alternative D, the California Department of Transportation (Caltrans) would have primary jurisdiction at this location because the crossing would involve a state highway. Adding a safe crossing would be beyond the control of the SFPUC and, therefore, the transportation hazard associated with trail users attempting to cross S.R. 92 outside of a designated crossing would remain significant and unavoidable.

The use of Old Cañada Road as an alternative to the project's proposed southern skyline ridge trail would result in greater environmental effects, relative to the proposed project. This is primarily due to Old Cañada Road's proximity to Upper Crystal Springs Reservoir. Whereas the southern skyline ridge trail would be located approximately 1 mile from the reservoir at its closest point, the commenters' proposed Old Cañada Road trail alignment would be approximately 380 feet from the reservoir at its closest point. As explained in EIR Section 4.8, Biological Resources, Upper Crystal Springs Reservoir provides breeding habitat for San Francisco Garter Snake and California red-legged frog, which are federally-listed as threatened or endangered species. Upland habitat within 1 to 2 miles of breeding habitat may be used by these species for refuge or dispersal. With new or substantially increased visitation along trails near primary habitat areas, there is potential for direct impacts (e.g., trampling and crushing) on these special-status reptiles and amphibians. Because of the southern skyline ridge trail's distance from the reservoir, and with mitigation, the EIR concludes that the southern skyline ridge

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trail would not result in substantial adverse effects on these species. However, for the same reasons set forth in the draft EIR for Fifield-Cahill ridge trail and Alternative D, increased visitor traffic along Old Cañada Road – which is presently closed to the public – would result in a substantial adverse effect on these species, and the effects could not be reduced or avoided through mitigation.

For the reasons presented, the commenters’ alternative concept would not avoid or substantially lessen environmental effects relative to those of the project. Therefore, the proposal does not meet the criteria set forth in the CEQA Guidelines Section 15126.6.

ALTERNATIVE TRAIL ALIGNMENT (VIA SKYLINE BOULEVARD AND SKYLINE QUARRY)

Comment I-Polacco.2 states a preference for an alternative with a trail along S.R. 35 (Skyline Boulevard) and an alternative with an opening at Skyline Quarry Road. With respect to the former (trail along S.R. 35, as described in Chapter 2, the proposed project includes the southern skyline ridge trail, which would extend approximately 6 miles south from S.R. 92, running alongside and set back from S.R. 35. The alternative concept with a trailhead at Skyline Quarry Road would be substantially similar to the proposed project and, therefore, would meet most of the project objectives. However, for the same reason, the alternative concept would not avoid or substantially lessen effects relative to those of the project. Therefore, the proposal does not meet the criteria set forth in the CEQA Guidelines Section 15126.6.

Comment AL-2: Analysis of Impacts

This response addresses the following comments, which are quoted below:

O-Green Foothills.5, O-Midpen.4, O-SFUR.2, I-Buncic.1, I-Chris-1.1, I-Mercer.2, I-Molitor-1.2, I-Molitor-3.2

“Alternative B, which would relocate the trailhead to a mile and a half south of the PUC’s proposed trailhead location, does not include adequate analysis of how the potential transportation impacts would be reduced, since trail users would likely use the shoulder of Skyline Boulevard along this major gap in the Ridge Trail.” (Lennie Roberts, Green Foothills, Email, August 10, 2020)

“Furthermore, the “Environmentally Superior” Alternative does not include adequate analysis to demonstrate how it would reduce the potential transportation impacts associated with an alternative extension of the South Skyline Ridge Trail.” (Ana Ruiz, Midpeninsula Regional Open Space District, Email, August 10, 2020)

“And the connection to the Purisima Open Space (indiscernible) is particularly important. There is a concern about the Highway 92 crossing. I want to say that the, certainly the trail is not a good mitigation for that, because there's two categories of trail users. One is the one which was mentioned, who are likely to use the trailheads. I'm happy with that. The other is people who are going to make a continuous route anyway, and no matter what is done, they will use the trail. And if the trail is shortened, they'll obviously

be forced onto a particularly dangerous section of the highway, which has many blind corners and fast cars.” (Matthew Blain, SF Urban Riders, Planning Commission, Hearing Comments, July 23, 2020)

“I write this letter to address the Draft of the EIR for the Southern Skyline Boulevard Ridge Trail Extension Project. In particular I want to draw attention to an impact I feel the EIR does not address. I speak to Alternative D: Alternative Trail Alignment. There is no discussion as to the impact this alternative would make to existing bicycle and or pedestrian safety in the area. I feel if this segment were to be enacted either as an alternative to the ridge trail extension, or in addition there would be a significant impact to bicycle safety in the area. This impact should be addressed in the final draft and mitigated in some form. This is a popular area for all levels of bicyclists. The construction of trails in the areas of Sweeney Ridge from the north to Crystal Springs Trail at its southern end would be welcome but also cause an increase in bicycle use in an already busy area. I find such as a positive, but certain already existing safety hazards need to be minimized or their existence would only exacerbate the potential for injury and traffic impact. In specific the Crystal Springs Regional Trail connection in the area of HWY 92 would be formalized. I also point this would likely increase bicycle traffic of the most novice users through its expansion of a scenic and level through corridor. The southern portion of Crystal Springs Trail is currently not open to bike use, thus forcing them onto Canada Road. This is a safety hazard for the increasing level of cyclists resulting from this alternative. While proficient cyclists may enjoy this section of road, this forms a pending hazard for increasing levels of novice and family cyclists. The most hazardous section is the southernmost section of the Crystal Springs Trail, where Canada Road diverges to the east of HWY 280. This is a high traffic area and a location of previous bike - automobile injury incidents. This southern section of the Crystal Springs Trail is gravel covered and suitable for bike travel, especially at low speed. I maintain the project as described would only increase the danger of bicycle incidents along a very busy section of Canada Road.

I propose this impact be mitigated in the following ways. Allow cyclists the option the use of the entire length of the Crystal Springs Trail through to its southernmost end. While avid cyclists may not prefer its surface many of an increasing novice user base may see it as a safe and pleasurable alternative. Indeed some surface improvements could be added here as well. The southernmost section of Crystal Springs is a gravel road and would allow bikers to avoid a dangerous section of Canada Road. This forms the most significant hazard with existing or expanded use under the project alternative. I commute along HWY 280 quite often, I find this section of Crystal Springs Trail to be lightly used. It could even be described as rarely used. The use is almost entirely pedestrian. I have only seen a single use of equestrian traffic in my many trips though the area recently. This simple change would require no change in the trail surface and would offer a much safer route for cyclists who chose it. Especially novices. I have witnessed many inexperienced cyclists diverted to the east side of 280 and traveling along a hazardous Canada Road. (See Photos Below) In order to mitigate this impact I propose SFPUC would work with SMCO Parks to open this section to Bicyclists. SFPUC would also work with the Town of Woodside to accomplish this as the southern gate borders the town. I see no reasonable barrier to this concept.

I hope you will find these comments suitable, and offer constructive points in order to make this project safe and equitable for the most diverse user group possible.” (Mike Buncic, Email, August 1, 2020)

“I hope you are staying safe and well. I'm generally supportive, but had the following concerns/additions to the EIR generally and also on Alternative B.

1. Alternative B proposes a large parking lot plus restroom to be built right next to the sole wetlands area along Southern Skyline Ridge about 2.3 miles south of 92 and 35. Its my understanding that there is at least one endangered bird nearby (I think the Saltmarsh Common Yellowthroat, but I'm not 100% sure. Its a bird listed as endangered in the Midpen Open Space Preserve district's work on Miramontes Ridge (which is just steps away from the Southern Skyline Boulevard Ridge Trail Extension) (relating to Madonna

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Creek). There is a seasonal creek as well near the proposed parking lot. My main ask is that this parking lot/restroom be moved either a half a mile north or a half a mile south from the proposed location (ideally, this would fit well right closer to the intersection of 92 and 35). If this can be done, then no need to read any further on this point. If it can't be done, then please consider the following:

a. wetlands support many species including endangered species - such as the mission blue butterfly. The reason this particularly area has wetlands is due to the slope/erosion issues when it rains - the water pools in that area, like a basin. Lately with huge storms we have been having, such areas have resulted in sudden and dangerous sink holes near the road. If you look up Skyline Boulevard and sink hole, you will see a dramatic picture of a sudden sink hole that required closing Skyline Boulevard just a little south of this same area. A parking lot would create additional issues in this wetlands basin area.

b. The parking lot/restroom would also be near a dangerous blind curve that scares all of us who live nearby. Sometimes we have to "hear for cars" because we can't see fast incoming cars.

c. Please consider visiting this area generally on the weekend on hot days during this current shelter in place. There are so many cars parked along Skyline as overflows to parking lots (see Purissima Creek North Trail Parking lot as an example), that its dangerous, particularly when cars are parallel parking, while other cars are speeding. Having all of this type of overflow which is likely next to a parking lot on peak days, would endanger human life, particularly right next to an already dangerous blind curve!!!

d. South of the intersection of 92 and 35 has very few homes, until you reach about 2.3 miles down, where a more dense residential area begins. Its puzzling why the parking lot and restroom would be right there - and also could create danger, unless a security guard monitors the area. Sex crimes can occur near restrooms that are unmonitored. This has been the case for unmonitored restrooms in Half Moon Bay. Regarding the dense residential community there, please note that because PG&E gas is not available there, most residents have propane tanks, so a fast moving fire could blow up one of the propane tanks, particularly with the high wind events we have been having. So, best to have a firebreak or some room between the trail and this patch of homes 2.3 miles south of 92 and 35 in addition to not having the parking lot and restroom right there near the propane tanks.

e. Please consider the speeders going through this blind curve.” (Chris, Email, July 18, 2020)

“Alternative B - which places parking on Skyline Road 1.4 miles south of Hwy 92 – fails to consider the added bike traffic that will be diverted onto dangerous Skyline Blvd. This alternative encourages bikers to extend their route north to a point on Skyline Blvd where they have NO alternative but to continue north on Skyline to Hwy 92, and then down 92 either east or west. Encouraging bikers onto this highway is a recipe for disaster.” (Kristin Mercer, Email, July 12, 2020)

“2. Alternative B is inadequate because it creates a new safety hazard that cannot be mitigated. It would put the Skyline Ridge parking lot 1.5 miles south of Hwy 92 in the middle of a blind corner. Anyone who regularly drives this section of road knows that is the last chance to get around slow vehicles & bicycles before going into the 1.5 miles of curves where passing is not allowed. This means that cars carrying a lot of downhill speed would suddenly and unexpectedly be faced with cars and pedestrians either entering or crossing the roadway. See this video for my personal experience approaching the proposed driveway <https://heyjerr.smugmug.com/Other/Misc-online-uploads/n-4WHX4/i-nnSB4nC> After recording that video I turned around and recorded from the other side of the road and actually recorded video of a car pulled over there that almost got hit twice whilst trying to pull out, and the approaching cars were both well under the speed limit. <https://heyjerr.smugmug.com/Other/Misc-online-uploads/n-4WHX4/i-tq2VVZR/A>” (Jerry Molitor, Email, August 10, 2020)

“There's a second alternative about a parking lot about a mile and a half south of 92, that is square in the of a very blind corner right after a very fast passing section. I think that creates a very unsafe section of roadway there.” (Jerry Molitor, Planning Commission, Hearing Comments, July 23, 2020)

RESPONSE AL-2

The comments identified generally concern the adequacy of the analysis of environmental effects of alternatives addressed in the EIR. In particular, the comments concern potential impacts of siting a new parking lot and trailhead under Alternative B, and operational transportation safety hazards under Alternatives B and D. Each is addressed under corresponding subheadings within this response.

GENERAL EFFECTS OF TRAILHEAD AND PARKING LOT LOCATION UNDER ALTERNATIVE B

Comments I-Chris-1.1, I-Molitor-1.2, and I-Molitor-3.2 include various statements regarding potential effects of siting the Alternative B trailhead and parking lot. As explained in draft EIR Section 6.3.2 (p. 6-19), under Alternative B, the parking lot and trailhead for the southern skyline ridge trail from the proposed location at the S.R. 35/S.R. 92 intersection to a new location approximately 1.5 miles south of S.R. 92. Contrary to the representation in comment I-Chris-1.1, the site would not be 2.3 miles south of the S.R. 35/S.R. 92 intersection, would not be near a wetland or seasonal drainage, and would not be near a residential area. As a result, the associated concerns identified in the comment are not addressed further in this response. Responses to other comments concerning potential project impacts on transportation, special-status wildlife, water quality, and residences generally are provided in Sections 11.4, 11.6, 11.7, and 11.11, respectively, of this RTC.

Comments I-Molitor-1.2 and I-Molitor-3.2 assert the location of the relocated parking lot and trailhead are unsafe due to the presence of a curve in the road which limits sight distance. As noted above, the location of the parking lot and trailhead identified is approximate. If selected, this alternative would undergo further study and design in accordance with applicable transportation safety standards. Notably, as the parking lot and trailhead would be accessed from a state highway, the driveway would require a permit from the California Department of Transportation, which would ensure that any approved driveway was designed in accordance with applicable state standards for safety, design, and operation. For these reasons, the comments do not identify an inadequacy with the EIR and no revisions to the alternative or analysis are warranted.

OPERATIONAL TRANSPORTATION HAZARDS UNDER ALTERNATIVE B

Comments O-GreenFoothills.3, O-SFUR.2, and I-Mercer.2, state the EIR's analysis of effects that would result from Alternative B is incomplete and should be revised to further address bicycle and pedestrian safety. As explained in Section 6.3.2 (p. 6-19), the primary purpose of including Alternative B in the EIR is that it would address the significant operational transportation hazards impact related to the potential for unsupervised project visitors to attempt crossing S.R. 92 at its intersection with S.R. 35. As discussed on pages 6-22 and 6-23, the analysis assumes that a 1.5-mile separation between the terminus of the existing Ridge Trail segment at Skylawn Memorial Park, north of S.R. 92, and the Alternative B trailhead and parking area, south of S.R. 92, is sufficiently long to remove the enticement for some trail users to attempt crossing S.R. 92. With this modification, the EIR concludes the project's significant transportation hazards impact would be eliminated. Based upon the comments received, the analysis in Section 6.3.2 is revised to more fully explain how the alternative would avoid or lessen the significant transportation hazard identified for the project, and incorporate mitigation identified for the project that could help reduce potential effects that could remain

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under Alternative B, even with relocation of the parking lot and trailhead. With these text changes, Alternative B continues to fulfil the criteria set forth in CEQA Guidelines section 15126.6, because it would be feasible, meet most of the basic project objectives, and avoid or substantially lessen a significant project effect.

In response to the identified comments, the text of Table 6-3, Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives, page 6-13, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, row Transportation and Circulation, is revised as follows:

Hazard posed by visitors crossing S.R. 92 would be eliminated or substantially lessened; reduced impact related to vehicles turning to and from relocated parking lot; less than significant.

In response to the identified comments, the text of Table 6-4, Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives, by Access Program Configuration, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised on page 6-16, first row, as follows:

Reduced; avoids or substantially lessens transportation impact, somewhat smaller project footprint. SUM impact related to spread of plant pathogens. LSM impacts related to transportation, cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.

Table 6-4, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised on page 6-17, first row, as follows:

Reduced; avoids or substantially lessens transportation impact; somewhat smaller project footprint. SUM impacts related to transportation, special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards

Table 6-4, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised on page 6-17, second row, as follows:

Reduced; avoids or substantially lessens transportation impact; somewhat smaller project footprint. SUM impacts related to transportation, special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.

In response to the identified comments, the text of Section 6.3.2.3, *Environmental Impacts*, page 6-21, is revised as follows:

6.3.2.3 ENVIRONMENTAL IMPACTS

Implementation of Alternative B would eliminate or substantially lessen a significant operations impact and decrease the intensity of some of the other significant construction and operations impacts identified for the project.

In response to the identified comments, the text of Section 6.3.2.3, *Environmental Impacts*, pages 6-22 and 6-23, beginning with the first paragraph under subheading *Operations*, is revised as follows:

OPERATIONS

The 1.5-mile gap between S.R. 92 and the southern skyline ridge trail relocated trailhead would remove an incentive for visitors of one trail segment to attempt crossing S.R. 92 to reach the opposite segment. In addition to the challenge of crossing the busy S.R. 92, the intervening stretch of S.R. 35 is a narrow, winding road, with a minimal shoulder in most locations – conditions expected to be unappealing to pedestrians, equestrians, and cyclists who might otherwise be tempted to cross S.R. 92 to bridge a shorter trail gap. While such conditions would be expected to deter most, it is possible that some trail users might still travel between the two trail segments. The installation of signs at the southern terminus of the Fifield-Cahill ridge trail and northern terminus of the southern skyline ridge trail similar to those identified in Mitigation Measure M-TR-5a would further reduce the potential for visitors to attempt crossings of S.R. 92. For these reasons, the operational transportation hazard identified for the project would be substantially lessened under Alternative B.

Given the distance and roadway conditions described, and with installation of signage, pedestrians and equestrians would not be expected to cross S.R. 92 to reach an opposite project trail segment. The segment of S.R. 35 extending south from S.R. 92 is identified by the City/County Association of Governments of San Mateo County (C/CAG) as a “cyclist suggested route” and a proposed class III bicycle route.^{1a,1b} Considering these designations, and the prevalence of cycling activity in the region, it is possible that a small number of cyclists might attempt to traverse the S.R. 35/92 intersection and 1.5 mile of S.R. 35 to reach the opposite project trail segment.

Thus, for the reasons described, Alternative B would avoid or substantially lessen the significant and unavoidable transportation and circulation impacts identified for the project (Impact TR-5). However, because the Fifield-Cahill ridge trail improvements would be the same as the project, Alternative B operations with unsupervised access along the Fifield-Cahill ridge trail could also result in significant and unavoidable impacts on San Francisco garter snake, California red-legged frog, Mission blue butterfly, and San Bruno elfin butterfly (Impact BI-5). Similarly, Alternative B operations with unsupervised access could result in substantial adverse impacts related to the spread of *Phytophthora* pathogens (Impact BI-7).

Operations impacts associated with the Fifield-Cahill ridge trail improvements would be the same as for the project (Impacts CU-3, CU-4, TCR-2, BI-4, BI-5, and HZ-8). However, operations impacts for the southern skyline ridge trail related to cultural and tribal cultural resources, biological resources, fire hazards would be slightly reduced, relative to those identified for the project (Impacts CU-3, CU-4, TCR-2, BI-5, and HZ-8) because with a southern shift in the southern skyline ridge trail parking lot and trailhead and a correspondingly shorter southern skyline ridge trail, visitors would use a smaller portion of the watershed as compared to the project. This would result in reduced potential for inadvertent discovery and damage to archeological resources, human remains, and other cultural resources of tribal cultural significance; a lower likelihood of encountering and harming California red-legged frog and nesting birds and their habitats; and slightly reduced wildfire hazard risk. As explained for Alternative B construction, the key drivers of the above-referenced operations-related impacts would be substantially similar to those identified for the project. For these reasons, the planning department expects that Alternative B would result in similar types of significant impacts as the project and require the same mitigation measures identified for project operations to reduce the operations impacts of Alternative B to less-than-significant levels.

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In summary, the overall intensity of construction and operations impacts would be slightly reduced under Alternative B relative to the project due to relocating southern skyline trailhead and parking area to the south, which would result in a 25 percent reduction in the length of new trail construction, and a 10 percent reduction in overall length of newly accessible trail for the SFPUC to operate and maintain. Alternative B would eliminate or substantially lessen the significant and unavoidable transportation hazards impact. However, significant impacts related to San Francisco garter snake, California red-legged frog, Mission blue butterfly, San Bruno elfin butterfly, and spread of *Phytophthora* pathogens would remain. Albeit slightly reduced, all of the significant-but-mitigable impacts would also remain, and the mitigation measures identified for the project would be required to reduce those impacts to less-than-significant levels. This alternative would not meet the project objectives to the same extent as the project.

^{1a} City/County Association of Governments (C/CAG), 2010, Map - San Mateo County On-Road Bike Routes, Off-Road Multi-Use Trails. Available at: https://ccag.ca.gov/wp-content/uploads/2014/07/SMBikeMap_Coverbooklet.pdf, accessed March 10, 2021.

^{1b} C/CAG, 2011, San Mateo County Comprehensive Bicycle and Pedestrian Plan. Available at: https://ccag.ca.gov/wp-content/uploads/2014/07/CBPP_Main-Report_Sept2011_FINAL.pdf, accessed March 10, 2021.

In response to the identified comments, the text of Section 6.4.2, Operations, page 6-35, is revised as follows:

6.4.2 OPERATIONS

Alternative A would avoid operational impacts because the SFPUC would not implement the project. Relative to the project, alternatives B and C would reduce operational impacts to a similar degree. By removing an incentive for visitors to cross S.R. 92 where no designated crossing exists, Alternative B would avoid or substantially lessen a significant and unavoidable transportation hazard impact identified for the project. Under Alternative B, significant impacts related to special-status amphibians, reptiles, and butterflies, as well as spread of plant pathogens, would remain.

In response to the identified comments, the text of Section 6.4.2, Operations, page 6-36, last paragraph, is revised as follows:

In summary, based on the evaluation above, Alternative B is the environmentally superior alternative among the project alternatives (other than the No Project Alternative). Alternatives D would avoid a significant project impact, but could also result in new or greater significant impacts. Alternative C would similarly avoid a significant project impact and would not result in new or greater significant impacts. However, Alternative B would have the greatest impact reduction because it would avoid or substantially lessen a significant traffic hazard impact, and have a greater reduction in significant-but-mitigable impacts. Alternative B also meets most of the project objectives.

OPERATIONAL TRANSPORTATION HAZARDS UNDER ALTERNATIVE D

Comment I-Buncic.1 asserts the EIR's analysis of effects that would result from Alternative D is incomplete and should be revised to further address bicycle safety. In particular, the comment requests additional analysis of the potential hazards that could occur with increased visitation along existing segments of the Crystal Springs Regional Trail (regional trail), as well as those that might result from conflicts between motorists and bicyclists. Regarding the latter, the comment states that bicyclists traveling south along the Alternative D multi-modal trail segment south of S.R. 92 would be forced on to Cañada Road at the new trail's connection with the Crystal Springs segment of the regional trail.

Regarding potential bicycle safety hazards associated with increased bicycle and pedestrian use of the Crystal Springs Regional Trail under Alternative D, the planning department acknowledges that increased use of trails may result in a proportionate increase in the number of accidents. However, under Alternative D the types of use and designs of affected segments of the Crystal Springs Regional Trail would not be modified, and the change in visitation would not cause congestion, such that hazardous conditions would result.

As explained in the draft EIR (p. 6-28), the Crystal Springs Regional Trail receives approximately 400,000 visitors per year, which would be expected to increase under Alternative D. The amount of increase is unknown. However, visitation for the proposed project, which would provide a different user experience in a different setting, was estimated to be up to 50,000 per year. As the majority of the Crystal Springs Regional Trail facilities would remain as they currently are under Alternative D, the novelty attraction of the alternative would be less than under the project, which could affect visitation.

Under Alternative D, all bicycle use would occur on paved trails. A recent study of San Mateo County parks users found that among park visitors, about 10.5 percent bike on paved trails.¹ Based upon the results of the visitor survey, and assuming an increase in Crystal Springs Regional Trail visitation similar to that estimated for the project, annual bicycle visitation would increase under Alternative D by about 5,250 visitors. While these visits would be distributed throughout the week and vary across the year, conservatively assuming all such visitation would occur on weekend days, the daily weekend increase in bicycle visitation would be about 51 visitors. Given this small number of new visitors, any proportionate increase in accidents would also be small in number. The alternative would provide new connections along and expand the length of trail available to visitors. Thus, considering the increased bicycle visitation would be spread over the course of a day and approximately 10 miles of trail, the increase would not cause or contribute to congestion which would increase the likelihood of accidents on the trail. Concerning the comment's assertion that Alternative D would force bicyclists to use Cañada Road, resulting in a significant safety hazard, the planning department respectfully disagrees. As explained in page 6-26, the SFPUC would construct a 1.3-mile new multi-modal trail extending south from the existing multi-modal Sawyer Camp segment, to a point of connection with the existing Crystal Springs segment. The Crystal Springs segment, on which bicycle use is prohibited, permits pedestrian and equestrian use and provides connection to Huddart Park and the Phleger Estate via trails on which bicycles are also prohibited. Alternative D would not construct facilities or propose access modifications within areas south of the subject trail connection such that bicyclists using the new trail under Alternative D would be forced or enticed to travel along Cañada Road to access project facilities or improvements.

For the reasons presented, Alternative D would not be expected result in substantial increased bicycle safety hazards along the Crystal Springs Regional Trail or Cañada Road. The project would not modify the travel mode along or the design of these facilities. Increased use of the Crystal Springs Regional Trail could reasonably be expected to result in a commensurate increase in the number of accidents, but the proportionate increase would amount to a small number of accidents. Moreover, considering the increased visitation would be spread over the course of the day and many miles of trail, the project would not increase trail congestion such that additional accidents would be expected. Similarly, the project would not force or entice bicyclists onto Cañada Road such that a substantial increased safety hazard would result. Thus, the EIR's analysis is sound, and no changes are warranted.

¹ San Mateo County Parks Department and San Francisco State University, Visitor Use/Non-Use Study 2015-2016. October 2016. Available online at: <https://parks.smcgov.org/sites/parks.smcgov.org/files/documents/files/Visitor-Study-Final-Report-072216.pdf>. Accessed March 10, 2021.

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11.11 General Comments

The comments and corresponding responses in this section cover general subjects, some of which are relevant to and addressed in the draft EIR, some are not. The comment topics relate to:

- GC-1: CEQA process
- GC-2: Support, Opposition, and Opinions Related to the Project
- GC-3: Equitable Access and Expanded Educational Offerings
- GC-4: Privacy, Property Rights, Property Value
- GC-5: Project Funding
- GC-6: Non-specific, Lists Multiple Issues

Comment GC-1: CEQA Process

This response addresses the following comments, which are quoted below:

A-CDFW.5, O-Midpen.5

“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.” (Gregg Erickson, CDFW, Email, August 6, 2020)

“On April 28, 2017, the District submitted the attached comment letter regarding the Project NOP. While a summary of District comments is included in Table 1-1, Summary of Scoping comments, in the Draft EIR, a copy of our comment letter is not included in Appendix A, Attachment D: Scoping Period Comments. Please include a copy of our comment letter in Appendix A with the Final EIR.” (Ana Ruiz, Midpeninsula Regional Open Space District, Email, August 10, 2020)

RESPONSE GC-1

In response to comment A-CDFW.5, the requirement to pay California Department of Fish and Wildlife CEQA document filing fees is noted. As acknowledged by the commenter, this fee is associated with and to be paid at the time of Notice of Determination filing, which would occur following EIR certification (if it is certified). Therefore, the comment is not applicable to this phase of the CEQA review process.

In response to comment O-Midpen.4, the EIR appendix referenced is a memorandum, dated March 6, 2017, which summarizes and presents comments received during the scoping period extending from December 21, 2016 to February 3, 2017. As explained in the draft EIR (page 1-4), subsequent to the date of the memo, the planning department expanded public outreach by mailing the Notice of Preparation to owners and occupants of properties within 300 feet of project sites, which extended the scoping period from March 30, 2017 to April 29, 2017. The letter referenced by the commenter was submitted during the expanded outreach period. All

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comments received during the initial and extended scoping periods are summarized in draft EIR Chapter 1, Introduction (Table 1-1 on pages 1-5 through 1-12), and were considered in preparation of the EIR. However, the memorandum in Appendix A was not revised to reflect the extended scoping period. In response to the commenter's request, EIR Appendix A has been revised to include an addendum to the March 2017 memorandum which summarizes the expanded outreach and presents the full text of the comments received.

Comment GC-2: Support, Opposition, and Opinions Related to the Project

INDIVIDUAL COMMENTS

This response addresses the following individual comments, which are quoted below:

A-CPC-Chan.1, O-BARTC-1.2, O-BARTC-2.1, O-CNPS.1, O-CNPS.6, O-GGAudubon.2, O-GreenFoothills.3, O-Midpen.1, O-POST.1, O-SequoiaAudubon.1, O-SFUR.1, O-SFUR.3, O-SierraClub.1, O-SVMB.1, O-SVMB.3, I-Abbas.1, I-Ackerman.1, I-Arias.1, I-Bain.1, I-Barile.1, I-Bartholomew.1, I-Beardsley.1, I-Benesis.1, I-Bergman.3, I-Block.1, I-Borac.1, I-Borden.1, I-Brinckloe.1, I-Brousseau-8.1, I-Brousseau-10.1, I-Brubaker.1, I-Burrows.1, I-Buxton.1, I-Carter-1.1, I-Cassel.1, I-Chaney.1, I-Chaney.3, I-Chang.1, I-Chavez.1, I-Cousineau.1, I-Coyne.1, I-Culligan.1, I-Cuviello.1, I-Davidson.1, I-de la Rosa.1, I-de la Rosa.3, I-Dev.1, I-DiMattia.1, I-Drees.1, I-Drees.3, I-Drees.5, I-Eberhardt.1, I-Eberhardt.3, I-Elliott.1, I-Emanuel.3, I-Evans.1, I-Evans.3, I-Eve.1, I-Fell.1, I-Ferrari.1, I-Ferreira.1, I-Fletcher.1, I-Fox.6, I-Fredrikson.1, I-Frost.1, I-Fuad.1, I-Gedgafov_D.1, I-Gedgafov_T.1, I-German.5, I-German.8, I-German.11, I-Gersh.1, I-Gibbons.1, I-Gila.1, I-Gosling.1, I-Guerra-1.1, I-Hall_A.1, I-Hall_R.1, I-Haye.1, I-Heiman.1, I-Hettenbach.1, I-Hettrich.2, I-Howse.1, I-Hyer.1, I-Hyer.3, I-Jankowski.1, I-Johansen-1.1, I-Johansen-2.1, I-Johnson_M.1, I-Kenin-1.1, I-Kenin-1.2, I-Kesterson.1, I-Kitto.1, I-Kitto.3, I-Klein.1, I-Korbholz_K.1, I-Kromat.4, I-Larsen_D.1, I-Le.1, I-Lee.1, I-Lee-Rodgers.1, I-Leroy.1, I-Lider-1.1, I-Liebes-L.3, I-Liebes_S.1, I-Lopez.1, I-Louie.1, I-Luiso.1, I-Luiso.3, I-MacCartney.1, I-Mackey.1, I-Mackey.3, I-Masterson.1, I-McCarthy.1, I-McDowall.1, I-McKitterick.1, I-Melin.1, I-Menshikov.1, I-Mercer.1, I-Mercer.3, I-Merrill.1, I-Michaels.1, I-Molitor-2.6, I-Mone.1, I-Naranjo-1.1, I-Naranjo-1.3, I-Naranjo-1.5, I-Naranjo-2.1, I-Naranjo-2.3, I-Newbold.1, I-Nichols.1, I-Nielsen.1, I-Ober.1, I-Ozaki.1, I-Pearson.1, I-Philibosian.1, I-Pillow.1, I-Polacco.1, I-Polacco.3, I-Pollak.1, I-Purrington.1, I-Qian.1, I-Qian.3, I-Rarback.3, I-Reinhart.1, I-Rix.1, I-Rix.3, I-Roberts-1.1, I-Roberts-1.3, I-Roberts-2.1, I-Romano.1, I-Romano.4, I-Rosenblum.1, I-Ruby_D.2, I-Ruby_D.4, I-Ruby_J.1, I-Ryan.1, I-Shafer.1, I-Schaub.1, I-Schlemmer.1, I-Schmidt.1, I-Scovill-2.3, I-Shurtleff.1, I-Sivarajah_A.1, I-Slezak.3, I-Smetters.1, I-Smith_O.1, I-Sox-Harris.1, I-Spangler_J.1, I-Spangler_J.3, I-Stansfield.1, I-Strnad.2, I-Sullivan.1, I-Sullivan.3, I-Sun-Millbrae.1, I-Tonetti.1, I-Turner.1, I-Turri.3, I-Vandeman.1, I-Vetter.1, I-Vroom.1, I-Walsh.1, I-Weber.1, I-White.1, I-Winter.1, I-Wood.1, I-Ycasas.1, I-Ycasas.3, I-Yost.1, I-Zampino.1, I-Zhu.1

“Okay. Let me just get organized here for my notes. Yeah, first of all I really appreciate the comment, the ability to comment on trail operations and access options as part of the EIR, draft EIR. I think it's really great that when we're considering a project, we're also thinking about the end users. I understand the need to protect our watersheds, and our ecological resources, and I think it makes sense to have some combination of a docent and unsupervised restricted program.” (Deland Chan, Planning Commission, Hearing Comments, July 23, 2020)

“The proposed project is the result of 20 years of planning and collaboration with neighboring land agencies and partner organizations, including: Midpeninsula Regional Open Space District (Midpen), Peninsula Open Space Trust (POST), Golden Gate National Recreation Area (GGNRA), San Mateo County Parks, and Green Foothills. In addition to strong partner support, this project has received significant investments including a \$1 million Priority Conservation Area grant from the Metropolitan Transportation Commission.

The proposed project and access program will provide an excellent opportunity for the public to recreate responsibly on their watershed lands. In regards to the proposed access program, the Council understands that maintaining the existing docent-led access program on Fifield Cahill is a compromise between access and conservation needed to maintain the natural integrity of the watershed lands and remain in compliance with the 1969 Scenic Easement¹. Maintaining the docent-led access program on the existing Fifield Cahill trail, allows two potentially “significant and unavoidable” impacts to native flora and fauna (Impact BI-5; access program variants 2 and 3) to be avoided. As for the new Southern Skyline Blvd trail extension, the development of a permit program would allow for broader but responsible access to the watershed on these less environmentally sensitive lands. This access program is consistent with the Scenic Easement that covers the 19,000 acres of the watershed and project area. Regional success of permit access has been demonstrated on Ridge Trail sections throughout the Bay Area, including East Bay Municipal Utilities District owned lands.” (Simone Nageon de Lestang, Bay Area Ridge Trail Council, Email, August 7, 2020)

“The Ridge Trail supports the staff-recommended project and access program and the draft EIR.” (Liz Westbrook, Bay Area Ridge Trail Council, Planning Commission, Hearing Comments, July 23, 2020)

“1) The public seems not to have a clear picture of the nature of the area and conceive of it as a park. It is not; its existence is due solely to the fact that it is crucial to a dependable high quality supply of water, and that identity must be the overriding issue in management decisions.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“We value public education regarding the nature of our support systems and continue to advocate increased public access through an improved and expanded docent program on Fifield-Cahill Ridge, as provided by Alternative B. We note that this is also the Environmentally Superior Alternative.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“Increased public access to this sensitive and critical habitat will have irreparable negative impacts on the Watershed for birds and humans alike. Mitigation efforts outlined in the Draft EIR do not go far enough to protect against these threats. Continued restricted access is the way to ensure the health of the plants, animals, insects, soil, water, as well as nearby humans.” (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“Green Foothills supports the SFPUC’s proposed project that (1) improves the docent program for hikers, cyclists and equestrians along the existing Fifield Cahill ridge trail, (2) creates a new half-mile long ADA trail accessed from the Fifield Cahill ridge trail; both of which are located north of Highway 92, and

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(3) creates a new six-mile long trail along the east side of Skyline Boulevard extending south from Highway 92 to the Phleger Estate (GGNRA) in Woodside.

We are particularly supportive of the continuation and expansion of the existing managed or supervised access through the auspices of the docent program on the Fifield Cahill ridge trail. Enhanced docent programs will increase public understanding and appreciation of the importance of watershed function, the area's rich diversity of wildlife, as well as historical and cultural features of these protected Watershed lands." (Lennie Roberts, Green Foothills, Email, August 10, 2020)

"The District specifically supports the Project's Objective 3 and access program variant 3, which include construction of an approximately 6-mile southern trail alignment parallel to Skyline boulevard (Highway 35), open to the public through unsupervised and restricted use under a permit system. The District also supports SFPUC's intent to work with Caltrans in the future to identify a feasible trail crossing of Highway 92 as identified in Mitigation Measure M-TR-5b – Construction of a Pedestrian/Bicycle/Equestrian Bridge or Roundabout. A future crossing of Highway 92 and the Objective 3 trail alignment from Highway 92 to the Golden Gate National Recreation Area Phleger Estate would close a key regional trail gap and assist in the creation of an approximately 100-mile continuous alignment of the Ridge Trail." (Ana Ruiz, Midpeninsula Regional Open Space District, Email, August 10, 2020)

"POST supports the implementation of a new, approximately 6-mile trail alignment parallel to Skyline Boulevard (Highway 35) between Highway 92 and the Golden Gate National Recreation Area's Phleger Estate, as it would close a key gap in the Ridge Trail. We support the use of a permit system for unsupervised and restricted use of this segment of the Ridge Trail.

POST supports the Project with some exceptions. Further planning and analyses are needed to meet the Project objectives, to ensure that public access is equitable and available to all, and to verify that recreational use of the land does not adversely impact native plant and wildlife populations. Specifically, we request the San Francisco Planning Department address the following concerns." (Walter Moore, Peninsula Open Space Trust, Email, August 10, 2020)

"We support the Environmentally Superior Alternative B with the trailhead being relocated 1.5 miles south of Highway 92, We agree that placement of a parking lot just south of the current one at the intersection of Hwy 92 and Skyline Blvd. could tempt continuing hikers to cross the highway at a very dangerous location.

We support Alternative C, the Pedestrian Only option because of the increased possibility of greater impact on special status species and sensitive natural communities caused by bicycles and horses. In addition, a 6' wide trail seems inadequate to support hikers, bikers, and equestrians all on the trail together.

We strongly support Access Program Variant 1 that improves the current Docent program for hikers, cyclists and equestrians that is in place on the Fifield-Cahill ridge trail north of Highway 92. We also support Access Program Variant 3, unsupervised/restricted (i.e. permit system) for the southern trail portion as this is preferred as being the most environmentally friendly option and would be consistent with the Scenic Easement that covers the 19,000 acres of the watershed including the two proposed trail sections in the Draft EIR." (Marshal Dinowitz and Leslie Flint, Sequoia Audubon Society, Email, August 7, 2020)

“We're very supportive of the project outlined in the report, particularly the new Southern Skyline Extension. It will provide an important piece of connectivity to the Bay Area Ridge Trail and the regional trail network in general.” (Matthew Blain, SF Urban Riders, Planning Commission, Hearing Comments, July 23, 2020)

“I'll also say the proposed project, with its trailhead close to Highway 92 provides better access to transit users as it's actually one of the few bus stops along the Skyline Ridge, anywhere in the, along the Santa Cruz Mountains. (Indiscernible) access team, I also want to talk briefly about the access variants. The proposed permit access to the southern extension is a reasonable approach to the balance between environmental protection and the access for users. The docent program to the north is extremely limiting, and so the EIR reflects that yes, there is some impact from that. But this restricted program, especially if we consider in our current time, is that impact to the public, and public access should definitely be considered for more options, the EIR possibly including other variants on how this could be done.” (Matthew Blain, SF Urban Riders, Planning Commission, Hearing Comments, July 23, 2020)

“We are pleased to note that Alternative B meets our expressed hopes for an improved/expanded docent program on the Fifield-Cahill segment, said docent program being vital to the ongoing protection of the unique environmental sensitivity of the Watershed. We cite the improved handicap access segment as another noteworthy improvement.

As to the Extension itself we believe the 1.5 mile separation serves the dual purpose of significant cost reduction by avoiding challenging terrain and by achieving conflict reduction by discouraging potential bike/ped crossings of Highway 92.” (Mike Ferreira and Arthur Feinstein, Sierra Club San Francisco Bay, Email, August 10, 2020)

“The Bay Area Ridge Trail is important to Silicon Valley Mountain Bikers because of its significant contribution to regional recreational values. We're very supportive of the project outlined in the report. In particular, the new Southern Skyline Extension will provide an important piece of connectivity for the Bay Area Ridge Trail and the regional trail network in general. The connection to Purisima Creek Redwoods Open Space Preserve and Phleger Estate are particularly important.” (Sean McKenna, Silicon Valley Mountain Bikers, Email, August 10, 2020)

“The proposed permit access for the Southern Extension is a reasonable approach to balance the important environmental concerns with the needs of users. However the docent program for Fifield-Chaill Trail is extremely limiting. I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use.” (Sean McKenna, Silicon Valley Mountain Bikes, Email, August 10, 2020)

“I am an SFPUC ratepayer from the city of San Carlos. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR.

I support adopting non-supervised access for all non-motorized users to this area. I have participated in docent-led use of the trail, and I am amazed that anyone that has would think that the docent supervision offered any benefit.” (Alexander Abbas, Email, July 24, 2020)

11. Responses to Comments

11.11 General Comments

“I am a homeowner in San Mateo, and I'm writing to voice support for the proposed opening of the Bay Ridge Trail in the San Francisco Watershed.

All over California, people are able to recreate near reservoirs and watersheds without issue, and the Crystal Springs reservoir sits near some of the best (but unopened) hiking space in the entire Bay Area. Opening this area to a modest amount of recreation would pay huge dividends for residents of the city and the Peninsula.” (Dylan Ackerman, Email, June 30, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Javier Arias, Email, July 5, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Candace Bain, Email, June 28, 2020)

“Please support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Jeff Barile, Email, July 13, 2020)

“I am writing to urge you to support unsupervised public access to the Fifield-Cahill Trail, i.e., the Bay Area Ridge Trail, in the San Francisco Watershed.” (Brendan Bartholomew, Email, July 20, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. I am a native of SF and lifelong resident of the Bay Area and fully endorse public access to lands held by the SF Watershed, just as our neighbors in Marin enjoy access to the open spaces of the Mt Tamalpais Watershed.” (Aaron Beardsley, Email, July 4, 2020)

“Please open the restricted area for hikers and bikers. We have hiked the opened areas so many times. It would be awesome to have some new trails available to us. Please, please, please with cream on top.” (Marc Benesis, Email, July 10, 2020)

“As the masking of the populace has shown, we cannot allow the public to be left to their own devices. Our natural beauty and environs needs structured care.” (Claudette Bergman, Email, August 6, 2020)

“Please note I support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (George Block, Email, July 16, 2020)

“I ask that my comments be included in support of non-supervised public access to the Fifield-Cathill Trail.” (Cleo Borac, Email, July 7, 2020)

“I support the Project rather than any of the alternatives. There is no good justification to put a hole in the Ridge Trail as contemplated in Alternative B. Alternative C also runs counter to the premise of the Ridge Trail and the benefits of excluding bikes and horses would not be because they are more lethal for fauna crossing the trail, it would be that it would greatly reduce the number of people on the trail. The whole point of this project is to open this area up to the public.

As for the Variants, #2 would allow access to the broadest range of potential users. This is the one I support. Variant 1, docent controlled, dramatically reduces public access. Docent controlled access is virtually no access. Variant 3 would be my second choice. the planning required to get permits would still exclude large demographic groups.” (Tom Borden, Email, July 24, 2020)

“I am a native Californian and have lived on the Coastside in Montara for 25 years. This land of ours--from the coast inland over 92 and through the Redwoods--is California Gold.

Since the opening of the tunnel at Devil's Slide, a flood of humanity has descended on us. And though we love people and we love to share, we are beset with a myriad of new housing developments that stain our roads and stress our environment and resources.

Do I need to say more?

Every morsel of land we can save is gold. Please take whatever measures you have the authority to take to honor our precious natural places.

From the heart and logical mind I respectfully urge you to support the Skyline Boulevard Trail Extension Project. It's compassionate, logical and in the end, good fiscal sense.” (Julie Brinckloe, Email, August 6, 2020)

“I am an SFPUC ratepayer from the city of San Mateo. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR in support of non-supervised access - particularly Access Variants 2.” (Christopher Brousseau, Email, August 4, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

Simply stated - the Fifield-Cahill trail should have non-supervised public access, just as the Midpeninsula Regional Open Space properties have had successfully for decades.” (Christopher Brousseau, Email, July 12, 2020)

“I am a resident of San Francisco. I am a long time supporter of the Bay Area Ridge Trail. I am writing in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project. I support the staff recommended project and access program.

I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use.

I want to see a continuous trail for all users, that encircles San Francisco Bay.

Public access to the outdoors is important to me and my community.

Do the right thing.” (Wesley Brubaker, Email, August 4, 2020)

11. Responses to Comments

11.11 General Comments

“While I agree with the below pre-written comments as a maximum choice, I feel we really need to re-think our approach to public access to the Peninsula Watershed, a unique wildlife preserve.. With the staggering world-wide and local losses of natural habitat and the resulting decimation of animal and insect life, adding any kind of human intrusion is counterproductive. While groups like Open the Watershed or the Bay Ridge Trial Cpuncil had perhaps laudable or romantic goals twenty years ago,, their time has long passed. Reading Open the Watershed's irrelevant and tortured rationalizations on why we should open more access to the Peninsula Watershed is painful. There are already dozens and dozens of other resources for humans to use locally. Please continue to both limit and increase limitations on human use of the Peninsula Watershed. The future of our planet, for all living beings, depends on this and many other similar actions.

Thank you,
Matthew Burrows

I support the proposal by the San Francisco Public Utilities Commission to expand the existing docent program on the Fifield Cahill ridge trail, construct a new half-mile long ADA trail accessed from the Fifield Cahill ridge trail (both north of Highway 92), and a new six-mile long trail along the east side of Skyline Boulevard extending south from Highway 92 to the Phleger Estate (GGNRA) in Woodside. This proposal will protect wildlife habitat and drinking water quality while providing appropriate public access” (Matthew Burrows, Email, August 10, 2020)

“I am in support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Mary Buxton, Email, August 9, 2020)

“I ask that my comments be included in strong support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

The EIR is now accepting public commentary. Public non-supervised recreational access to the Fifield Cahill Trail would be a major improvement in recreational access for Bay Area residents. Public access would be in accordance with the EIR, particularly Alternative D, which reads: "allow multi-modal (pedestrian, bicyclist, and equestrian) access on the connector trail between Sweeney Ridge and the Crystal Springs Regional Trail, and along the trail between the Sawyer Camp segment and Crystal Springs segment. The existing access modes described above for the Crystal Springs Regional Trail would not change, nor would those for the Huddart County Park trail system, which also allows pedestrian and equestrian access on some trails and pedestrian-only access on others. Visitor access along the 1.2-mile connector trail would be the same as described for the project (e.g., could range from docent-led access to unsupervised/unrestricted), during daylight hours. Visitor access along the 1.3 miles of new trail would be consistent with that of the adjacent existing Crystal Springs Regional Trail segments (i.e., unsupervised/unrestricted access) during daylight hours."

Docent-led access, provided in the past, is problematic and never works for the public. It is not a viable option. Docent-led access does not permit recreational use to meet the trail user’s recreational needs for the simple reason that hiking, jogging, and biking are done at different speeds, by different types of athletes, with different abilities, at different times, with different goals in mind. Doing these activities in a large group does not satisfy recreational needs. Recreational access in open space reduces stress, increases health, improves quality of life, and is considered by many to be the best part of living in the Bay Area. There are a number of other examples of very successful public access to watershed areas, such as the Mount Tamalpais Watershed, managed by the Marin Municipal Water District. We should absolutely do the same on the Peninsula.” (Jonathan Carter, Email, June 27, 2020)

“As a local Siera Club member, avid hiker, and volunteer at Edgewood, I am delighted to learn that Alternative B has been selected by the Draft EIR for the Fifield-Cahill Ridge watershed area. I am looking forward to hiking on an eventual new trail from Highway 92 to Phleger Estate, and joining docent programs North of Hwy 92 – when such will be possible again.” (Edith Cassel, Email, August 6, 2020)

“I do not support opening the SF Watershed to the public. This is a very sensitive area, and one of the few places in the area where wildlife is totally protected from human incursion.” (Carolyn Chaney, Email, July 20, 2020)

“I hike a lot in the parks and preserves of the peninsula, and I don’t always love the people who share the trails. Many leave trash, including plastic bags of dog poop, and others ignore the safety precautions put in place by rangers during the pandemic, such as walking in reverse on one-way trails. I believe that we have plenty of places we can roam in nature...and that there is very little reason to open up the pristine watershed to humans who want to enter freely. Let’s leave a bit of space for the mountain lions, bobcats, coyotes and other creatures.” (Carolyn Chaney, Email, July 20, 2020)

“hi there, i'm an SF resident and a long-time watcher of the process to open the watershed trails. i'm writing to express my support for opening it to multi-use (walking / bike / etc) and especially variant #3 which does a better (IMO) job of hooking up the rest of the bay area ridge trail. the rest ridge trail usage maintains the balance of ecological protection while giving public access, and i think this variant achieves this as well.

Anyway, it’s time to keep this ball rolling.” (D. Change, Email, August 8, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Teri Chavez, Email, July 6, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. And opening up the watershed in general, now more than ever people need access to nature for physical, and mental health, and education on the systems that support us and the ecology around us.” (Austin Cousineau, Email, July 6, 2020)

“I'm writing to share my comments on the EIR for the project. I live in San Francisco and very much support this project. The Southern Skyline Ridge Trail will allow hikers and bicyclists to avoid unsafe conditions along Skyline Blvd as well as contribute to the Bay Area Ridge Trail, a major long-term regional priority.” (Brian Coyne, Email, August 10, 2020)

“I ask that in support of being fully inclusive to all SF residents, that I strongly support - and believe you should to, non-supervised multi-use public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Burke Culligan, Email, June 30, 2020)

11. Responses to Comments

11.11 General Comments

“I am a resident of Belmont, CA. I am writing in opposition to the proposed Southern Skyline Boulevard Ridge Trail Extension Project. I do not support opening up this pristine area to people. There are very few places left in the Bay Area where wildlife can live without human intrusion and interference. If there is going to be people allowed it should be by guided tour or permit only and only pedestrians should be allowed; no bikers and no horse riding.” (Pat Cuviallo, Email, August 8, 2020)

“I hope this email addresses the proper subject matter at the correct juncture in the process of opening the SF Watershed to increased recreational opportunities.

I write in support of the Southern Skyline Boulevard Ridge Trail Expansion project. Having grown up (and still having family and extended family) in Palo Alto, and having lived in Marin for the last year and San Francisco for the 10 before that, I understand the importance of regional open space as well as connecting open space pathways to allow for human-powered activity. This is particularly relevant in times of COVID-19, where we need all the open space we can get.

I frequently choose to travel to visit family by bicycle. In Marin, I have a network of protected pathways and wonderful open space. In San Francisco, the Bay Trail continues along the waterfront via the protected Crissy Field, Marina Green, and Embarcadero Promenades. However, there is a large gap through San Mateo County. I often take Skyline Boulevard from Daly City south all the way to Sand Hill Road. When it is open, I will take the Sawyer Camp Trail through Crystal Springs. However, demand for this open space far outstrips the available space, and the pathway is often oversubscribed. I would far prefer to spend the entire journey along peaceful, car-free paths deep in nature.

Please note my support for opening the SF Watershed to multiple uses, including cycling, as part of a regional connected Bay Trail and expanded recreational opportunities for all.” (Andrew Davidson, Email, August 5, 2020)

“I am a SFPUC ratepayer and feel that the PUC is archaic in its thinking and needs to understand the import of having environmentalists supporting its watershed. The best way to understand the import of maintaining a watershed, is to be able to have enough access to it to understand its beauty. I believe the watershed should be open to hiking just as it has been in Marin and Alameda Counties. There has been no harm to the quality of Marin and Alameda County water due to open hiking access and it is a crime to keep the peninsula watershed private with access only given to a few elite individuals.” (Anne de la Rosa, Email, August 9, 2020)

“The Bay Area ridge trail is a great asset to the peninsula, and we ratepayers, should be able to have it completed through the SFPUC watershed.” (Anne de la Rosa, Email, August 9, 2020)

After reading thru the alternatives and also about how this area supports several of our endangered species, I would like to see it treated with more care than is possible if we open it to the public without docents. Therefore I am in support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Gita Dev, Email, July 11, 2020)

I'm an avid cyclist living in San Francisco and am writing in support of the skyline ridge extension project, ideally access variants 2 or 3. I mostly ride gravel in Marin's extensive network but would love to do more exploring south of the city." (John DiMattia, Email, August 8, 2020)

"I am a SFPUC customer in San Francisco. I support unrestricted public access to the watershed." (Natalie Drees, Email, August 6, 2020)

"2. I respect that this watershed needs to protection for the safety our water source and wildlife. However, considering how populated the Bay Area is, use on existing area trails is minimal. I can go for miles on Montara Mountain on a weekend day and not see another soul. Opening more trails will just disperse people making human impact to each area less. Other watershed in the Bay Area are open to the public who respect the rules and care for the trails. The care taken by visitors to adjacent properties with regards to respecting plant and wildlife and wildfire awareness will carry over to the watershed trails." (Natalie Drees, Email, August 6, 2020)

"As a San Francisco resident, tax-payer and water customer, and long-time San Francisco and peninsula resident, it would be nice to have public, unrestricted use to an area that I have admired from afar for years and pay to maintain." (Natalie Drees, Email, August 6, 2020)

"We are residents of Pacifica, where we have lived for over 25 years. We are avid hikers and have been hiking the Baquiano and Sweeney Ridge Trails ever since we moved to Pacifica. It has always troubled us that we have had to turn around when we get to the Portola Gate. It makes no sense to us whatsoever that hiking is restricted on the Fifield-Cahill Ridge Trail or the existing road or trail that extends up to Montara Mountain. We saw the notice on the Portola Gate and want to express our strong support for any of the alternatives that would open the Fifield-Cahill Ridge Trail to hiking." (Doug Eberhardt and Lisa Mann, Email, July 26, 2020)

"We would dearly love to see the road connecting the Fifield-Cahill Ridge Trail to the North Peak Access Road opened to hiking, but we are grateful that the Fifield-Cahill Ridge Road itself may at least be opened to unrestricted hiking." (Doug Eberhardt and Lisa Mann, Email, July 26, 2020)

"I am writing on behalf of the Bay Area Ridge Trail in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project. I support the staff-recommended project and access program as it best meets the project goals and Ridge Trail's mission to create a continuous trail for all users that connects the ridgelines of the San Francisco Bay Area. On a personal note, I was in attendance at the SFPUC Commission meeting on December 18, 2002, when the Commission approved Alternative E for the Cahill-Fifield Trail with a 5-0 vote. In fact, I wrote the minutes for that meeting and recall how elated everyone with Bay Area Ridge Trail, Mid-Peninsula Open Space, and all the other environmental groups and government partners were that day when their efforts were fulfilled by a unanimous vote. I hope the same result for this project, as public access to the outdoors is vital for the health and well-being of human beings. The Cahill-Fifield Trail has proven that such projects can have tremendous benefits and be done responsibly in allowing the public access to the watershed lands." (Janet Elliott, Email, August 6, 2020)

11. Responses to Comments

11.11 General Comments

“I believe it is a public service and duty to responsibly open up the peninsula SFPUC lands and I believe this is possible without meaningfully compromising water quality or increasing fire or other risks, in the way many watershed lands are open to the public in the Bay Area and beyond. As such I support non-supervised access on the Bay Area Ridge Trail in this EIR, and to other similar trails in peninsula SFPUC watershed lands.” (Alex Emanuel, Email, August 6, 2020)

“I am a teacher and father in San Francisco. I am really happy to hear about this project! I am writing in support of variant 2 (unsupervised access without a permit) for the southern skyline ridge extension project.” (Bart Evans, Email, August 8, 2020)

“I am also concerned that docents, if for example were mostly white, would turn off community members of color. Also finally we all need more open space during the pandemic.” (Bart Evans, Email, August 8, 2020)

“Please protect pristine watershed wilderness on Peninsula. I'm sending this email opposing the opening of this pristine area, and opposing mountain bikers and horses if it is opened.” (Eve, Email, August 10, 2020)

“San Francisco PUC is considering opening up the pristine forest area of the watershed to hikers, bikers and horse riders. This is one of the last wild areas in the Bay Area where wildlife are free from human intrusion, interference and harassment. It will especially be a disaster if mountain bikers and horse riders are allowed in the area. Horse poop can contain giardia. If this gets into the reservoir it can be a disaster. My experience with mountain bikers is they don't care what damage they do as long as they can get their cheap thrills. In our Belmont open space the bikers have cause deep ruts on the trails and regularly go off trail created severe erosion. Again, I'm sending this Email opposing the opening of this pristine area, and opposing mountain bikers and horses if it is opened.” (Eve, Email, August 10, 2020)

“I am very excited to hear of increased access to the watershed. I am an avid cyclist in San Carlos and would love the ability to ride off road north of 92 in a thru route fashion. The docent program is too limiting.

“I am most excited about the new section of trail south that would allow multimodal access by continuing the Bay Area Ridge Trail thru your land. I ride this area all the time, skirting the closed watershed on a daily basis. I would treasure access to this huge swath of land that basically encompasses most of my backyard. I support Access Variant 3.” (Ryan Fell, Email, August 8, 2020)

“I am in support of the SFPUC's plans to improve and develop recreational trails in the Peninsula Watershed lands. Keeping supervised access in the watershed will protect water quality and wildlife.” (Ellie Ferrari, Email, August 8, 2020)

“I applaud the Planning Department's selection of Alternative B in the DEIR for the extension of the Ridge Trail through the SFPUC Crystal Springs Watershed that would retain and improve the docent program that has performed so well over the past decades since it was wisely chosen by SFPUC. The starting and ending points for the new trail south of Highway 92 are also wisely chosen in terms of safety issues at Highway 92, landform alteration avoidance and the potential consequent costs.” (Michael Ferreira, Email, August 6, 2020)

“I support the proposal by the San Francisco Public Utilities Commission to expand the existing docent program on the Fifield Cahill ridge trail, construct a new half-mile long ADA trail accessed from the Fifield Cahill ridge trail (both north of Highway 92), and Alternate D as crossing 92 to get to 35 will be deadly for all concerned.” (Alma Fletcher, Email, August 9, 2020)

“In summary, the fire risk from power lines is much greater than risk from hikers, so, please open the SF Watershed to hikers, or take down the power lines. Also, hikers pose no real threat to butterflies, snakes, or water quality, so, logically, hikers should be allowed, we need nature.” (Jamie Fox, Email, August 10, 2020)

“I am a resident of the Kings Mountain community where the Draft EIR for the SSB RTE is being contemplated. I would like to submit these objection regarding the inadequacy of the Draft EIR.

- 1) The impetus for this 6 mile trail to nowhere was a connector of the Bay trail to the Phleger Estate. However, Hwy 92 blocks such a connection. It is essentially a trail to nowhere that serves no real purpose. We have an abundance of well maintained trails for hiking and biking on the mountain already that are widely used and enjoyed by Bay Area residents.
 - 2) A 6'-12' trail that is enclosed by fencing (including barbed wire) hardly offers the "out in nature" experience that is another goal of such trail building.
 - 3) Alternative D is a far better choice for effectively opening up Watershed property for public access.
 - 4) Although costs are not available in the EIR materials, any amount spent on a project that does not accomplish its goal is irresponsible.” (Eileen Fredrikson, Email, August 10, 2020)
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“As a native Peninsulan born and raised in Palo Alto and now living in Belmont, I URGE you to NOT open the Peninsula Watershed for the use of human activities. The “Southern Skyline Ridge Trail” proposal must not be approved. You can visit our own Water Dog Preserve in Belmont to witness the negative effects mountain bikers have wrought on this pristine piece of nature that exists among our neighborhoods. No matter that they are illegal, the bikers continue to create and use off road trails destroying the natural habitat, frightening away the native wildlife and nearly colliding with day use walkers.

Whenever humans are allowed into a pristine area, litter and destruction are bound to occur. People simply cannot help themselves from behaving badly. And the quiet beauty of these outdoor landscapes will suffer the consequences if we allow humans to enter them.

I implore you to NOT create the “Southern Skyline Ridge Trail” and to allow nature to continue existing on its own without the negative and unsightly impact of humans and their activities.” (Shelley Frost, Email, August 8, 2020)

11. Responses to Comments

11.11 General Comments

“I am a resident of San Francisco and frequent user of the bay area ridge trails. I am writing to you to express my support for accessible and safe bike trails to be added along Skyline Blvd. I would also advocate for better access to Fifield Cahill Road, which currently is only accessible by appointment only (and I have never been able to ride). Overall, I support the proposed Southern Skyline Boulevard Ridge Trail Extension Project, and I support the staff recommended project and access program.” (Michael Fuad, Email, August 8, 2020)

“Dear Mr. Johnson and the Honorable SF Planning Commission, Please open the restricted area for hikers and bikers. The area is very beautiful and I think it should be enjoyed by all.” (Daniil Gedgafov, Email, July 10, 2020)

“Please open the restricted area for hikers and bikers. It is a beautiful area and it is a shame that nobody can enjoy it, bikers and hikers never litter and always follow the rules.” (Tamara Gedgafov, Email, July 10, 2020)

“Building a parking lot so close to the vista point at Highways 92 and 35 will only invite the public to overflow into the vista point’s parking lot making their lot unavailable for its intended purpose. This is what happened with the Skeggs Point Vista parking lot across from Midpeninsula Open Space’s original entrance to El Corte de Madera Creek Park. None of the signs were of any use and it continues to be abused by visitors to the park. Moving the parking lot as suggested in Section 6.2.3.2 could discourage a similar situation.” (Carrie and Tim German, Letter via Email, August 7, 2020)

“As a hiker, walking for six miles in basically a cage and then turning around and walking six miles straight back does not sound appealing. Having a docent point out items of interest would make the hike more educational and interesting.” (Carrie German, Email, July 23, 2020)

“We are strongly in favor of continuing the docent-led hikes as are now, hopefully successfully, being used on the FifieldCahill Ridge Trail - Access Program Variant 1 (Docent Program) or Access Program Variant 3. Either would eliminate the need for much of the fencing. The parking lot could also then be smaller. Restricted public access would lessen the possibilities of pathogen transportation, fire hazard and environmental damage. We are also in favor of CEQA Alternative D (Section 6.3.4). In fact, we would encourage that be done as soon as possible as it appears to meet the project’s objective quickly and fairly easily.

The benefits of constructing the Southern Skyline Ridge Trail seem to be minuscule in relation to the overwhelming amount of physical work that needs to be done, and the work that has already been done, to bring this project to fruition. In conclusion, we support Alternatives A, B and D; Access Program Variants 1 and 3. Unrestricted and unsupervised access to the fragile and critical watershed would be too easily accessible by the too many people that are reckless, inconsiderate, irresponsible and environmentally negligent.” (Carrie German, Email, July 23, 2020)

“I’m a resident of San Francisco who frequently enjoys hiking on the Peninsula. I’ve had the experience of visiting the Fifield-Cahill property with docents a few times.

I'm writing to support Alternative B, which will preserve access to Fifield-Cahill, while still protecting the environment, as well as providing additional hiking trails for many to experience." (Barbara Gersh, Email, July 15, 2020)

"Please build the Southern Skyline Boulevard Ridge Trail Extension Project.

I heard about it via the Bay Area Ridge trail group. My husband and I have walked most of the BARidge trail and had the opportunity (once) to hike along the Crystal Springs Reservoir. It is all a wonderful part of our Bay Area.

I have worked on the Pathway Committee (in the past) in the town of Los Altos Hills. I have done countless hours of research and outreach learning/teaching how much trails benefit communities. Take my word for it that trails are needed, used, a huge benefit, and certainly currently when more people are walking close to home, very very timely to build NOW. Trails and paths rarely cause the litter, gang / theft, drinking of teens that opponents like to imagine. Parking can be something of an issue which is why it is very good to see parking as part of this plan." (Eileen Gibbons, Email, July 23, 2020)

"I would like to support the Southern Skyline Boulevard Ridge Trail Extension Project, ideally with variant 2 (unrestricted access) to the new trail so that the greatest number of people can enjoy it.

Just this past weekend, I biked to Half Moon Bay from SF where I live, and this trail would have made it easier to avoid Skyline Blvd, which can be scary/dangerous to bike on due to the fast traffic." (Barak Gila, Email, August 10, 2020)

"I am a resident of Kings Mountain, and an avid hiker and cyclist on the local trails. The southern Skyline Boulevard Ridge Trail Extension Project would open up a huge set of possibilities for me and my family to connect by bike to SF and great cycling routes south of the city.

This proposed trail would also be a beautiful route and destination in itself. I currently avoid the several miles of 35 approaching 92 as the road is extremely narrow with bad visibility and speeding motorists. The proposed extension would open up a huge range of safe riding options for us, north of Purissima.

I am also excited about what this step could mean for progress towards a complete loop of the bay by bike/hiking. We live in one of the most beautiful areas of the world and providing greater access to these vistas for all would be of huge value.

Public access, trails, then environment, and the watershed are important to me. I support Access Variant 3. The proposed variant provides the flexibility needed for resource protection through the permit process, while allowing much greater access for a broader range of people than those who can schedule a visit with the current program." (Marcus Gosling, Email, August 5, 2020)

"I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail." (David Guerra, Email, June 27, 2020)

"As a former SF resident and current resident of Pacifica, I want to strongly encourage the unsupervised opening of the Fifield-Cahill trail (bay area ridge trail). It is a huge disappointment that it is inaccessible to the public. Even if small segments were opened, such as the connector from Sweeney Ridge through to Montara Mountain, that would be a game changer.

11. Responses to Comments

11.11 General Comments

I ask that my comments be included in the EIR study for the trail.” (Andrew Hall, Email, July 16, 2020)

“Please support Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project. We’re in the midst of a climate crisis and, according to the United Nations study, a biodiversity crisis. We have to do the least amount of damage to our precious natural heritage as possible in order to have a strong food web for wildlife.” (Robert Hall, Email, July 13, 2020)

“I see that there is the possibility of opening up more public access around the southern skyline boulevard ridge trail, and I think it would be a wonderful idea.

As a cyclist, I love riding the road at Sweeney Ridge, and the Sawyer Camp/San Andreas trail, and I have been longing for more of this land to be accessible for hikers, bikers and other responsible non-motorized users.

It feels that this land belongs to everybody, and that there should be ways for the public to be able to use this responsibly, without the need for permits or docent tours.” (David Haye, Email, August 10, 2020)

“While I appreciate the level of environmental review and detail included in the draft EIR, the scope of the trail extension is inadequate in providing full public access to the existing trail system in the SF watershed. I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Ross Heiman, Email, July 2, 2020)

“I urge you to support alternative B. Thank you for your help.” (Gerri Hettenback, Email, August 10, 2020)

“The open space around Kings Mountain was created for the public not just for Kings Mountain residents. Please pursue plan B which gets bicycles, pedestrians and equestrians off Skylline Blvd.” (Renate Hettrich, Email, August 10, 2020)

I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

Science and common sense says that people should be able to traverse this trail, like in the surrounding parkland.

My oldest ancestor on this peninsula lies in Colma, & was born in San Francisco in 1898. So is my family history when the watershed was closed in 1930, and it is my family history to yearn to explore it.

But it’s all of our history that the SFPUC is not democratically accountable to the residents of San Mateo County at all. And that is at the heart of why this Watershed has been closed for all these years” (Andy Howse, Email, July 1, 2020)

“We would like to voice our support for Alternative B laid out in the Environmental Impact Report,” (Jeanette Hyer and Arturo Alvarez, Email, August 11, 2020)

“In addition, Alternative B mitigates some of the impacts on the environment, in comparison to the original plan.” (Jeanette Hyer and Arturo Alvarez, Email, August 11, 2020)

“I am a Bay Area resident and I strongly support the proposed Southern Skyline Boulevard Ridge Trail Extension Project and Access Variants 2 or 3. Thank you.” (Jesse Jankowski, Email, August 7, 2020)

“I must say that I am most surprised with your project, especially since I hadn't heard of it before. I am also alarmed that it has gotten this far! There is no need for a trail that lets the public so close to the reservoir. My Army Special Forces buddies, and FBI friends claim that the reservoir is a perfect terrorist target for Anthrax, or a dirty bomb. Currently, the SF Water Dept conducts guided tours & bicycle rides of these areas. We don't need the public roaming around these areas. We have already had a few "All points bulletins" raised for lost hikers.

Skyline Blvd, south of 92 is completely over burdened now. We don't wish to see more lost tourists pulling illegal U-turns, or backing up, just because they missed the parking lot. This is way too much of a delicate environment to let hoards of wondering public littler, and endanger other motorists.

If we truly wish to help this area, then perhaps a tunnel should be built for through traffic on 92 to connect with Halfmoon Bay, and by-pass our last little piece of tranquility, that is Kings Mountain.

Mr. Johnston, I am strongly against any further, or additional trails, or extensions that would lure more people to this area. Our litter problems are on the rise from the hikers, our mail theft problem is on the rise, and traffic issues (including having tourists park on my own personal property) are all escalating. Hopefully you understand our dilemmas and can cancel, or reverse this project?” (Fred Johansen, Email, June 27, 2020)

“By now I hope that your team realizes that this trail extension project is a terrible idea, that must not continue. Both Cal Fire, and the Kings Mountain Volunteer Fire Brigade are already overwhelmed with the way things are now. Just the idea of more activity, no matter what it may be, is absurd in the Skyline area, south of 92.” (Fred Johansen, Email, August 9, 2020)

“I am an SFPUC ratepayer from the city of San Mateo. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR in support of non-supervised access - particularly Access Variants 2.” (Mike Johnson, Email, August 9, 2020)

“I wanted to follow up on my previous email. I live in SF and am a supporter of the proposed Southern Skyline Boulevard Ridge Trail Extension Project. The proposed project achieves the stated project goals, in particular, those to support the Bay Area Ridge Trail Council's goal of creating a continuous multi-modal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay. What an asset that would be for our region.” (Alexandra Kenin, Email, August 8, 2020)

“Specifically, I support variant 3, which will improve public access while maintaining ecological and watershed protection. Public, unescorted access is very important, many other local watershed lands

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support this, and I think San Francisco as a progressive city should finally do the same.” (Alexandra Kenin, Email, August 8, 2020)

“I'm writing to express my support the proposed southern skyline ridge trail and specifically, extended access for bicycle riding on open trail space.

Opening access to bicycle riding on trail systems helps to create links between road ways, adds fun to a bike ride, and is a good idea. These are not wild downhill trails and the cycling community that uses these trails know how to be safe while riding.

When using trails like this I am able to ride my bike to the trail and incorporate it as part of a longer ride. This reduces parking needs at the trailheads, which are always at a premium. This also reduces mileage driven to the trailhead. Planning for bicycles is always a good idea.” (Ian Kesterson, Email, August 5, 2020)

“I am a resident of San Francisco, work in San Mateo County, and am a frequent trail user of open spaces in the project vicinity. I am writing to support the proposed Southern Skyline Boulevard Ridge Trail Extension Project. The proposed project achieves the stated project goals, in particular those to support the Bay Area Ridge Trail Council’s goal of creating a continuous multi-modal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay.” (Patrick Kitto, Email, August 5, 2020)

“I support access Variant 3, which will improve public access while maintaining ecological and watershed protection. More so, I support any and all programs that allow unsupervised access to public lands for all trail users, and oppose public funds being spent on significant parking facilities. The most effective use of public funds would be to make trail right-of-way improvements and grant access to the public to enjoy the publicly owned open space. If habitat protection is the major concern, installation of habitat protecting features should take precedence over parking and restroom facilities. I have traveled Fifield-Cahill Ridge multiple times through the docent program, but the limitations of supervised use prevents consistent and convenient use of public land. While it is not the major use case, the proposed project locations with unsupervised access has the potential to be a world class open space nonmotorized travel route, for both local and long distance travel. Given the traffic conditions of alternative routes from Pacifica to Woodside, this section could be a crown jewel of the Pacific Coast Bicycle touring route, the Bay area Ridge Trail.” (Patrick Kitto, Email, August 5, 2020)

“I am a bicyclist, and I'm writing to support the proposed Southern Skyline Boulevard Ridge Trail Extension Project. My father, Larry Klein, was a former General Manager of Hetch Hetchy Water and Power, and he rode his mountain bike on the inaugural docent-led ride on the Fifield Cahill Trail through the watershed. He raved to me about his experience. He instilled in me a great respect for watershed protection, but he was also a proponent of access as well.

I still have not managed to get on a docent-led ride, though I did hike it once a couple of years ago, and marvelled at the possibility of including it on a big, mixed-terrain cycling loop. I have ridden from my house in Belmont, on the mid-Peninsula, up north along Sawyer Camp Trail, and then continued up Sneath Lane to Sweeney Ridge. From there I rode down a trail to Hwy 1, and headed south to Purisima Open Space where I climbed back up to Skyline. From there, I took Skyline north to 92, and descended on that east to Cañada Road, finally taking Sheep Camp Trail to get back into Belmont. I included as much off- road as possible, because for me it's safer, more challenging, and more enjoyable.

This sort of riding is why I support Access Variant 3. Having a permit available would provide resource protection, but give the flexibility to allow me and my fellow riders to do longer loops like this.

The part of Hwy 1 south of Pacifica is frankly quite scary to ride until you get to the Half Moon Bay airport. Having a continuous Ridge Trail option would be safer and much more scenic and fun. The addition of Ridge Trail between Hwy 92 and Purisima Open Space would also be much safer than riding along that stretch of Skyline.

The Bay Area Ridge Trail starting at Raply Ranch Road at the north end of Russian Ridge OSP is continuous all the way south to Sanborn County Park above Saratoga. I've ridden loops through all of it and it is spectacular! I'm a big proponent of a multi- user and continuous Bay Area Ridge Trail, as it provides amazing opportunities for all of us.

In closing, public access, trails, the environment, and the watershed, are all important to me. I support Access Variant 3, as this option provides the flexibility needed for users through the permit process, and allows much greater access for a broader range of people than those who can schedule a visit with the current program, while still providing for resource protection.” (Joel Klein, Email, August 9, 2020)”

“I am writing in support of wildlife protection, drinking water quality, and public access and education in the San Francisco Peninsula Watershed.” (Kathy Korbholz, Email, August 6, 2020)

“I realize that the trail extension is about granting more access to people for recreation, it’s just hard for me to imagine how this can be done in a safe and environmentally sound way.

The impact both on the environment and the people surrounding the trail areas would be far reaching and negative in my opinion.” (Heidi Kromat, Email, July 22, 2020)

“I ask that my comments be included in support of unsupervised access to the Fifield-Cahill, Bay Area Ridge Trail through the SF watershed. I am also am in favor of completing and opening the section of trail between HWY 92 and the Phlegar Estate Park trails, along Skyline Blvd. Please allow us to hike and / or bike these trails and enjoy the nature and exercise in this area. More areas are needed for people to get outside and exercise and support open spaces.” (Denise and Don Larsen, Email, July 2, 2020)

“I am writing you to voice my support unsupervised public access on the Bay Area Ridge Trail, through the San Francisco watershed. This is a beautiful resource that should be shared with all us citizens.

I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (David Le, Email, July 11, 2020)

“Ridge trail Extension. Project. Please support.” (Lee, Email, July 11, 2020)

“I would like to express my support for the full and unrestricted opening of trails in the SF peninsula watershed, including the Fifield-Cahill road and trails crossing Lake Pilarcitos.

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The watershed area is home to beautiful lakes and trails which would greatly enhance the lives of the residents of the peninsular.

The reasons for keeping the land closed are minimal compared to the benefits that opening would bring. Thanks for taking these comments into consideration” (Alexander Lee-Rodgers, Email, July 6, 2020)

“Quite a few of my neighbors here near the watershed have reservations about the potential traffic impact of the project. However, unlike many of them, I've been following this project for a while. Traffic is a valid concern up here, but overall I'm excited by the prospect of safe access to a bit of the watershed. It is a gorgeous area, one I hope we can preserve and enjoy.” (Lieven Leroy, Letter via Email, August 9, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

Many other Bay Area water districts support unsupervised access on their land (Marin, EBMUD) and we should be able to, too.” (Brett Lider, Email, July 9, 2020)

“In this time of Covid-19-and who know how long this will go on?-the actions above will be heralded by all as essential to human health and well-being as well as wildlife! With appreciation for, I hope, the SFPUC's support of the above vital issues.” (Linda Liebes, Email, August 7, 2020)

“Having been a deeply involved participant in the efforts, half a century ago, to protect in perpetuity the wilderness habitat of the San Mateo Crystal Springs Watershed, I write in support of the SFPUC's proposed extension of the Bay Area Ridge Trail south of Highway 92, and the improved docent programs on Fifield Cahill Ridge.” (Sidney Liebes, Email, August 7, 2020)

“Hello Mr. Johnson, I am a resident of San Francisco and I am writing to encourage you to support Alternative B for the extension project to help protect the rare, threatened and endangered species that thrive in the area” (Toni Lopez, Email, July 13, 2020)

“I am deeply concerned about human activities disrupting what little is left of natural settings. Therefore, I support Alternative A, no changes.

I wish humans would show more respect for undisturbed nature, in this era of declining species, abundance and biomass. Greta Thunberg has it right; we are in the midst of a climate change crisis as well as an environmental crisis. The reason the United Nations delared the current Decade on Biodiversity is that humans have destroyed too much habitat and sent too many species to extinction or the brink of extinction. Scientists speak of mass extinctions, the insect apocalypse, and 2/3 of North American bird species at risk of extinction in the foreseeable future. We should do all that is in our power to protect habitat for native plants and wildlife that evolved with them. Our human footprint is already too large. Can you see it?” (Denise Louie, Email, July 10, 2020)

“As a lifelong resident of the bay area, I URGE you to NOT open the Peninsula Watershed for the use of human activities. The “Southern Skyline Ridge Trail” proposal must not be approved.” (Mark Luiso, Email, August 9, 2020)

“I implore you to NOT create the “Southern Skyline Ridge Trail” and to allow nature to continue existing on its own without the negative and unsightly impact of humans and their activities.

Thank you for considering my position.” (Mark Luiso, Email, August 9, 2020)

“I a writing to support Alternative B of the draft EIR for the Southern Skyline Boulevard Ridge Trail Extension Project. This approach will maximize protection for the environment and for numerous important and imperiled species as well as allowing the public to enjoy a special habitat.. When I was young, to see a San Francisco Garter Snake (we called them Rainbow Snakes) was a special bit of luck. I want to know that this and other species will be kept safe in perpetuity.

Please give your support to Alternative B.” (Robert MacCartney, Email, August 9, 2020)

“As an avid Mountain Biker and Hiker, I welcome any new additions of trail that provide more opportunities to visit different places in the bay area. I look forward to a day when the Bay Area Ridge Trail is complete, and we will be able to ride or hike an entire loop around the SF Bay. I also look forward to a much more accessible SFPUC Watershed. This large swath of land has been kept off limits to the public far too long. It MUST be reopened for more recreational opportunities, as the current lands available are already overcrowded. The current limitations to only allow docent-lead trips is overly complicated and restrictive; and, I feel, unnecessary. I realize this current plan only takes one step towards these goals, but I still wish to express my support for them and the direction that this access should be going towards. Below is the copy provided by others supporting these goals. To strengthen this push, I provide it to express my support of their view as well. I am writing to support the proposed Southern Skyline Boulevard Ridge Trail Extension Project. The proposed project achieves the stated project goals, in particular those to support the Bay Area Ridge Trail Council’s goal of creating a continuous multimodal (pedestrian, bicycle, equestrian) trail that loops the San Francisco Bay. The trail also benefits many other users.” (Theral Mackey, Email, August 6, 2020)

“Public access, trails, then environment, and the watershed are important to me. I support Access Variant 3.” (Theral Mackey, Email, August 6, 2020)

“Please keep the Watershed closed to the general public. Allowing people to access the trails with out supervision could create chaos. Unsupervised folks walking thru the pristine environment of the watershed will degrade the environment. Think about garbage, people leaving the trails or roads and going “cross-country” in this protected area.

The watershed area is a precious jewel for San Francisco. It is an area that been protected and unmolested. The value of this protected wild area is unmeasurable.

Please keep this area closed for future generations. Not every area has to be open to man. How about leaving spaces just for the animals and plants.

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I ask that my comments be included **against non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.** (Carol Masterson, Email, July 17, 2020)

“I am writing to share my thoughts on the proposed Southern Skyline Ridge Trail Extension Project. As a long time resident who calls Kings Mountain home I think the public needs and safety would be best served by accommodating bicycle traffic. People are in danger on the roads: both cyclists who need a place to ride (there simply aren’t enough places to enable that) and car drivers. Skyline Blvd. needs bike lanes far more than another hiking/walking trail. We are blessed with miles and miles of those thanks to earlier forward thinkers. Help us think forward for a reasonable biking solution. It would be the most environmentally responsible focus. Thank you for your time and consideration.” (Stacy McCarthy, Email, August 10, 2020)

“I am a Bay Area college student who grew up in Woodside on the Peninsula. I absolutely love the open spaces and trails available in the Bay Area, and support for Alternative B of the Southern Skyline Boulevard Ridge Trail Extension Project.

This option will ensure that the Peninsula maintains good quality drinking water, while also protecting the habitat of Bay Area wildlife. Furthermore, the proposed 6 mile trail south of 92 will give Peninsula residents more access to beautiful open spaces, and help with the completion of the Bay Area Ridge Trail, a trail I and many others hope to hike in its entirety when it is completed.

Thank you for your time, and I hope you will support Alternative B.” (Kate McDowall, Email, July 8, 2020)

“I was for many years a Planning Commissioner for the Town of Portola Valley, where environment-based planning has been the standard for all for over a half-century. The continued closure of the Watershed lands to the public has not been based on environmental science, or any other reasonable considerations. The Watershed is not wilderness – it is land that has deeply felt the impact of human intervention for more than 100 years. To continue to refuse to let the public freely use it for low-impact activities such as hiking and biking is unjustifiable.

The science is most of the Watershed can be opened to the public in a manner that will have no material impact on the environment. Rather, it will have positive impacts for our communities and their health, given the limited access to open space particularly on the weekends in the mid- and northern Peninsula.

It is especially important, at this time for our nation, to see San Francisco provide the public an outdoor resource such as this, in a decision based on science and public welfare.

Thank you for your consideration. Please include my comments in support of open public access on the Bay Area Ridge Trail.” (Nate McKitterick, Email, June 29, 2020)

“I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR. I support non-supervised access to the trail system. These existing trails and dirt roads which are used for maintenance vehicles already would provide a wonderful safe alternative to ride a bike on and avoid the dangerous roads full of vehicles.” (Dan Melin, Email, August 8, 2020)

"I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail." (Sergey Menshikov, Email, June 29, 2020)

"I support Alternative A (NO project) or Alternative D (eastern boundary trail alignment) for the following reasons:

The Project: Unsupervised bike access is proven to lead to environmental degradation. Evidence the severe damage occurring in Belmont's Water Dog Park – an 80 acre open space in which the city allows unlimited bike access. Bikers now outnumber hikers by 2-1, including e-bikes which cannot be enforced. Hikers are no longer safe on the trails due to speeding bikes. The number of unsanctioned trails has doubled in the past 10 years and new trails are being created by vandals weekly. Based on Belmont's experience, creating bike access anywhere along Skyline Blvd will lead to unsanctioned bike incursion into the restricted areas of the watershed." (Kristin Mercer, Email, July 12, 2020)

Alternative C – Extension of hiking-only trails adjacent to the heavily trafficked Skyline Road creates no benefit for hikers, who will likely shun this route due to traffic noise and lack of a circular route. It is doubtful that bikers could be prevented from illegally using the trail, as they do elsewhere in all the POST and MidPen properties.

This proposal thus incurs all of the environmental damages, while providing no real public benefit.

Alternative D – which directs and contains public access to the eastern flank of the watershed - to areas already impacted. This alternative has the least impact on species, habitat and historical sites. Plus it provides for a pedestrian connector to existing open space areas and connection for the bay ridge trail. Further, the trail access is from points more widely accessible to a wider socio-economic group. Let's be honest. The bike trails that you seek to develop are promoted and used by a very affluent and privileged segment of the population. Very seldom do we see the disadvantaged riding their \$1000 bikes on the open space trails, nor setting personal goals of riding the circumference of the bay area. Mountain biking is a sport for the rich. **Please elect to invest your project funds in places accessible by public transit and by socio-economic groups who need nature opportunities closer to home. This is NO PROJECT unless it's an alternative serving all socio-economic groups equally.**" (Kristin Mercer, Email, July 12, 2020)

"I am writing today to let you know that our South Bay/Peninsula area family of four active voters asks you to please support Alternative B for the Southern Skyline Boulevard Trail Extension Project. We strongly support this "Environmentally Superior Alternative," and urge you to do all you can to ensure its adoption." (Thea and Steve Merrill, Email, July 11, 2020)

"I am writing in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. If there is a concern regarding overcrowding, then a system of online permits could easily be implemented, as is done in the East Bay with some open space (I think maybe EBMUD has that on some trails)." (David Michaels, Email, July 6, 2020)

"As I stated at the start, I am aware that you will always receive pushback for new plans but I guarantee that this is not simply a case of NIMBYism. I beg of you not to simply look at these complaints as obstacles to overcome and conquer but rather as serious feedback that should be taken to heart in order to maintain

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the status quo. These trails do not bring in additional monies, at least not to the communities that they affect, so I do not see a tangible benefit that outweighs the numerous grave concerns that we residents should not have to bear being piled upon us even further. Please do not make this trail the “straw that breaks Kings Mountain’s back”. (Jerry Molitor, Email, June 25, 2020)

“I am a resident of Woodside and I support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Carol Mone, Email, July 11, 2020)

“I am a resident of Burlingame and an SFPUC ratepayer. I am writing in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project and would like my comments to be made part of the public record. I support the staff recommended project with unsupervised access, particularly access variants 2 or 3.

The COVID-19 pandemic has highlighted the critical importance of access to open spaces for fitness, physical and mental health, and recreation. The pandemic has also highlighted that the demand for outdoor recreation in the SF Peninsula far exceeds the available open spaces that are close to where people live. Open spaces throughout the SF Peninsula are experiencing record high visitorship and it is difficult to practice social distancing under such circumstances. Public access to more trails in local open space matters now more than ever.

The proposed project to open Fifield Cahill trail and trails south of 92 provide a wonderful opportunity for more families to enjoy outdoor recreation. It will promote healthy outdoor recreation during a critical time when our health system is being strained by the pandemic. For these reasons, it is critically important that the project go forward with access variants 2 or 3 to provide the highest level of access and so as to be inclusive to all.” (Michael Naranjo, Email, August 6, 2020)

“The project can be implemented in a manner that promotes safety to the environment, without limiting access through the use of docents. Other water districts in Marin and the East Bay have permitted unaccompanied recreational access of this nature with great success and minimal environmental impact.” (Michael Naranjo, Email, August 6, 2020)

“I support opening the San Francisco Watershed lands for more responsible and inclusive recreational use.” (Michael Naranjo, Email, August 6, 2020)

“I wholeheartedly support the project, and then commend the Public Utilities Commission on its enactment of the EIR. I do take issue, however, with some of the findings. First of all, we need to consider, as an environmental consideration, public health, and the ability of additional trail access to allow for more outdoor recommend recreation. Number two, the addition of the trail will also burden the use of the existing trails. Number three, the trail will allow safety of cyclists by getting them off the road, at least for a portion of Skyline Boulevard. Number four, this can be done safely to the environment. Other water districts in Marin and in the East Bay have permitted recreational access of their watersheds, with great success and minimal environmental impact.” (Michael Naranjo, Planning Commission, Hearing Comments, July 23, 2020)

“Overall I support the enactment of the project, as scoped out, with limited - with the most limited amount of restrictions, specifically, by going forward with Variances 2 and 3 in the EIR. Thank you.” (Michael Naranjo, Planning Commission, Hearing Comments, July 23, 2020)

“I am a resident of San Francisco and in support of “Alternative B” in the Environmental Impact Report (EIR) for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Julie Newbold, Email, July 10, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. During these times it is more apparent than ever how important it is to have nearby options for outdoor recreation.

It pains me to walk on the crowded Sawyer Camp Trail with my two boys and try to explain to them why it is OK for us to walk on this side of Crystal Springs, but not on the other side.” (Ryan Nichols, Email, July 1, 2020)

“As a Sunnyvale resident who is dependent on SFPUC water, I am writing to support building out the Southern Skyline Ridge Trail, making watershed land access open to all, and ensuring the trail network stays connected.

As a hiker and a bicyclist, I would love to see the full trail constructed. There are many trails that have small but puzzling gaps -- and Alternative B, while it does make the Fifield-Cahill trail more accessible, leaves a gap between it and the Southern Skyline Ridge Trail. As noted in the EIR, this proposal only partially meets project objectives 3 and 5. While more trails are better than none, it is frustrating to be faced with a trail gap that requires additional driving or walking along unfriendly roads.

I hope that someday I will be able to walk (and bike!) the entire length of the Bay Area Ridge Trail.” (Hans Nielsen, Email, August 5, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Richard Ober, Email, July 4, 2020)

“I am an SFPUC ratepayer from the city of San Mateo. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR in support of non-supervised access - particularly Access Variants 2.” (Tsuyoshi Ozaki, Email, August 10, 2020)

“Add my name for support of this alternative B. Enid Pearson, former PA Vice Mayor and City Councilwoman and Vice Chair of Ca Water Commission, years 1965 to 1978 era. Thanks” (Enid Pearson, Email, July 28, 2020)

“I am writing to express my support for the proposed Southern Skyline Boulevard Ridge Trail Extension Project. More specifically I support a hybrid of several of the proposed variants and alternatives. For the proposed new southern Skyline trail I support unsupervised, restricted multi-modal access through a

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permit program. For the northern (Fifield-Cahill) trail section I support unsupervised, restricted (through permits) pedestrian-only access, with equestrian or bicycle access continued to be supervised through the docent program. This would substantially increase the recreational accessibility of the area while continuing to limit the detriments from more high-impact activities of cycling and horseback riding.” (Belle Philibosian, Email, August 10, 2020)

“I am strongly in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. This is a cause I'm very passionate about and will be working tirelessly to secure more support moving forward. Please keep me informed on any developments.” (Thomas Pillow, Email, July 1, 2020)

“I am writing in support of the Southern Skyline Boulevard Ridge Trail Extension Project. I especially want to voice my support for OPEN and CONNECTED trails.

I am a San Francisco resident, father and husband, outdoor enthusiast, nature lover, conservationist, and professional biologist.

As you are stewards of a large piece of publicly owned land, I believe you are responsible for managing it for the greatest public good. In this case, I believe open and connected trails close to our homes are not only compatible with that mission and your primary mission of safe drinking water, but required by that.

Outdoor access and engagement with nature is important for the long term health of the public and long term health of nature. Public that engages with nature will support and defend nature, and we need that in a democracy.

More open nature close to people’s homes results in less driving and greenhouse gases. Connected trails encourages more through route and less driving, thus less greenhouse gases.” (Ben Polacco, Email, August 10, 2020)

“I also support enhanced access to the Fifield Cahill Road (and Whiting Ridge Road) for all the reasons above.” (Ben Polacco, Email, August 10, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Ted Pollak, Email, June 28, 2020)

“I’m writing in support of Alternative B for the Southern Skyline Ridge Trail Extension. As the draft EIR indicates, Alternative B is the best option for expanding access to hikers, mountain bikers and other users in the region while providing key protections for endangered and at-risk wildlife and plant habitats. Many critically sensitive species are found in the watershed, including the Mission Blue Butterfly and California Red-Legged Frog. It’s important to prioritize the continued health of these habitats over human access and I believe Alternative B is the best option for doing so. Alternative B is supported by local chapters of Sierra Club and the Audubon Society as well as other environmental advocates such as the California Native Plant Society.” (Tracy Purrington, Email, July 28, 2020)

“My name is Hansen and I am a longtime resident of the Bay Area, formerly of South Bay and in the past 5 years of San Francisco. As an avid hiker, biker, and user of the multiple open spaces in the Bay Area (I was just up on Skyline yesterday!) I believe that it's more important than ever to create and maintain new trails for public access and appreciation of outdoors space.

I'm writing in support of Variant 2, and secondly, of Variant 3. I believe that open spaces are best visited with friends and family when convenient to everyone, especially if one wants to enjoy nature themselves at an unrestricted pace.” (Hansen Qian, Email, August 10, 2020)

“As someone who's biked and hiked along Skyline Blvd between 92 and Purisma Creek, this trail is sorely needed to ensure that people stay safe and out of the way of speeding cars on that highway. I encourage you and the commision to support Variant 2 (and secondly, Variant 3).” (Hansen Qian, Email, August 10, 2020)

“As a Half Moon Bay Councilmember and frequent user of the trails near Skyline Highway, I appreciate that these two projects will help the public access these wonderful areas in an environmentally friendly way.” (Harvey Rarback, Email, August 6, 2020)

“I totally support Alternative B.” (Pat Reinhart, Email, July 11, 2020)

“I am a resident of the Kings Mountain area, very close to the proposed extension of the southern section of the trail that runs through the SF Watershed. About ten years ago I hiked the entire Bay Area Ridge Trail, and it was one of the best experiences of my life. I understand how every mile of this Bay Area treasure has been hard-fought, and am appreciative of everyone who put in, and continues to put in, the enormous effort to complete the entire 500 miles. So I am in full support of this project but want to express a few concerns about access.” (Betsy Rix, Email, July 22, 2020)

“I also think it would be most prudent to start the southern section of the trail open with docent-led access only, as a trial, subject to evaluation. The third alternative of unrestricted access might need to wait a few years, pending observation.

Thank you for your consideration of my thoughts!” (Betsy Rix, Email, July 22, 2020)

“I'm an avid road and mountain biker based in San Mateo, riding throughout the bay area for 25 years now. We are very lucky to have this area to ride in our own backyard, however one of the challenges is connecting short sections of good roads/trails into fun loops, not out-and-backs or rides that mean you need to drive somewhere just to start. The proposed opening of Fifield Cahill and Southern Skyline Ridge Trails sound like excellent options to help in that regard.

While I'm sure you've heard from plenty of others, and may be a bike rider yourself and already know this, I thought I'd elaborate a bit more based on my personal experiences riding in both of those areas.

Fifield Cahill is beautiful, as is the entire area surrounding Crystal Springs reservoirs. I've hiked it with my wife on a docent led hike. While I know you can join docent led bike rides, making an appointment well in

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advance, and arriving at a defined time in the middle of a bike ride really takes the fun out of it.” (Rama Roberts, Email, August 5, 2020)

“If I were forced to pick just one, opening up the already established Fifield Cahill trail would win hands down.” (Rama Roberts, Email, August 5, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Rama Roberts, Email, July 5, 2020)

“We are residents of Woodside, and are in support of the Southern Skyline Boulevard Ridge Trail Extension Project.” (Christina Romano and Bruce Puckett, Email, August 8, 2020)

“Inclusive public access to SFWD lands is important to us and my community.” (Christina Romano and Bruce Puckett, Email, August 8, 2020)

“I support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Stephen Rosenblum, Email, July 11, 2020)

“I am a docent-naturalist for the SFPUC Fifield-Cahill trail. My vote is for option B, which I believe is also supported by the Sierra Club.” (Dennis Ruby, Email, July 23, 2020)

“For these reasons I support option B, controlled access to be the same as for the Fifield-Cahill property.” (Dennis Ruby, Email, July 23, 2020)

“Please understand I am all for people being able to access the wonderful trails and open space in our County so don’t presume I am playing NIMBY when I am making the following comments. The reasons presented are valid and critical to the discussion regarding the reasons this extension project in a regrettably bad idea.” (Jan Adair Ruby, Email, August 10, 2020)

“I am a resident of Pacifica and would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR. I support non-supervised access for the area, specifically access variants 2 or 3.” (Ted Ryan, Email, August 10, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

As in accordance with the EIR, particularly Alternative D which reads: "allow multi-modal (pedestrian, bicyclist, and equestrian) access on the connector trail between Sweeney Ridge and the Crystal Springs Regional Trail, and along the trail between the Sawyer Camp segment and Crystal Springs segment.

The existing access modes described above for the Crystal Springs Regional Trail would not change, nor would those for the Huddart County Park trail system, which also allows pedestrian and equestrian access on some trails and pedestrian-only access on others. Visitor access along the 1.2-mile connector trail would be the same as described for the project (e.g., could range from docent-led access to unsupervised/unrestricted), during daylight hours.

Visitor access along the 1.3 miles of new trail would be consistent with that of the adjacent existing Crystal Springs Regional Trail segments (i.e., unsupervised/unrestricted access) during daylight hours." (Jeff Schafer, Email, June 26, 2020)

"I have reviewed the draft EIR and found it to be exceptionally detailed. My main comment is that the most access to the trail should be allowed, and scaled back where necessary to prevent environmental impacts. I have traversed the entire Ridge Trail, including portions of the SFPUC and EBMUD districts where restrictions are in place.

I truly hope that the project can be built as proposed, and that the Hwy 92 can be addressed later on. If restrictions to bicycles or horses are needed, then so be it, but I hope the full extent of the Ridge Trail can be realized. Thanks for your work!" (Jeremy Schaub, Email, August 14, 2020)

"I'm writing to ask that you support "Alternative B" in the Environmental Impact Report for the Southern Skyline Boulevard Ridge Trail Extension Project.

This alternative provides the greatest protection for the highly endangered Mission blue butterfly, as well as other endangered species." (Patrick Schlemmer, Email, July 10, 2020)

"My husband and I are residents of Santa Clara County and support Alternative B." (Lisa Schmidt, Email, July 14, 2020)

"The Watershed property is some of the most historically important in California. And some of the most hidden from the public. This is a cultural heritage issue for native Californians and newcomers alike." (Will Scovill, Email, July 24, 2020)

"I am an SFPUC ratepayer from the city of San Bruno. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR. In support of non-supervised access. Particularly Access Variant 3.

I believe that we, the Peninsula Ratepayers, Citizens, and registered voters, are fully worth of UNLIMITED, non-supervised access to OUR SF Watershed trails. How can SFPUC and PG&E allow the fire danger from trees above power lines (serving our homes), but not allow hikers and bikers? This double standard must stop. Open the SF Watershed.

Monitors and volunteer crews YES...but public barriers and KEEP OUT SIGNS...NO." (Jeffrey Shurtleff, Email, August 9, 2020)

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“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. This’s overdue for a Democratic county. We are not living in Hong Kong or China but Freedom USA. Please respect the wishes of the people. The country belongs to them not to the bureaucrats.” (Arulampalam Sivarajah, Email, July 7, 2020)

“Public access, trails, then environment, and the watershed are important to me. I support Access Variant 3. The proposed variant provides the flexibility needed for resource protection through the permit process, while allowing much greater access for a broader range of people than those who can schedule a visit with the current program.” (Doug Slezak, Email, August 6, 2020)

“I am an SFPUC ratepayer from the city of San Carlos. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR in support of non-supervised access - particularly Access Variants 2.” (Diana Smetters, Email, August 10, 2020)

“I want to express my support for Alternative B in the EIR for the Crystal Springs Watershed. I am a Redwood City bike rider who loves bike on the Camp Sawyer trail and looked forward to Alternative B be implimented.” (Oscar Smith, Email, July 10, 2020)

“Bayarea residents need more open space. If the pandemic has taught us anything, its that social distanced trail use is a precious resource for our physical and mental health. The experience of MPOSP and San Mateo County Parks and East Bay MUD show that non-motorized trail use is completely compatible with the priorities of the SF Watershed. I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Alex Sox-Harris, Email, July 1, 2020)

“I support the proposed Southern Skyline Boulevard Ridge Trail Extension Project, including the ADA accessible trail. I recommend that the City of San Francisco implement the project with unsupervised recreation access variants 2 or 3 to permit as much public access as possible.

My mother, Nita Reifschneider Spangler (1923-2018), founded the Portolá Bicentennial Foundation in 1967 to help preserve the historic ridge from which the Spanish explorers first saw San Francisco Bay in 1769. She wrote the successful application for it to become a National Historical Landmark and later served on the San Mateo County Recreation and Parks Commission for 14 years. Public access to Sweeney Ridge was always important to her and it is important to me.

The panoramic views from these ridges, including Skyline Boulevard (SR 35), are among the best in the Bay Area and in California. I was born in Redwood City and grew up spending untold hours in and around the Crystal Springs watershed and bicycling along the Sawyer Camp Trail, Skyline, Highway 92, and Cañada Road. (I can remember hiking along the ridges above San Carlos and Belmont with my mother just before I-280 was constructed.) I love to ride these familiar roads and hike these trails when I can get across the bay from Alameda.” (Jon Spangler, Email, August 9, 2020)

“Please open the public watershed lands for more responsible and inclusive recreational use and approve the Southern Skyline Boulevard Ridge Trail Extension Project with unsupervised access (variants 2 or 3)

while maintaining proper environmental protections and fire suppression precautions.” (Jon Spangler, Email, August 9, 2020)

“I support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project.” (Lesley Stansfield, Email, July 14, 2020)

“Non-Supervised access to authorized trails and subject to reasonable and clearly posted rules is the only legitimate option for public access to the watershed lands. Please include my comments in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Jason Strnad, Email, July 8, 2020)

“I support the 6 mile extension from Ca 92 to Phleger Estate. I ask that the 6 mile extension be accessed with yearly permit (variant 3) and unsupervised for the entire length of the 6 mile extension.” (Jim Sullivan, Email, July 23, 2020)

Allowing bicycles with a yearly permit from dawn til dusk, 7 days a week on this extension will greatly enhance riders safety.”

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. Thank you,” (Jim Sullivan, Email, July 23, 2020)

“I ask that my comments be included in support of keeping this area closed to public access on the Fifield-Cahill (Bay Area Ridge) Trail. We already have a lot of open access to public land and free space. If it is opened, it will require people to monitor so that visitors will follow rules to keep the area clean. Already (on existing trails), some people break rules, such as bring their dogs even though there is clear signage that this is not allowed.” (Jadie Sun-Millbrae, Email, July 13, 2020)

“I am writing to state my support for unsupervised public access on the Bay Area Ridge Trail, through the San Francisco Watershed. During this time when safe outdoor activities and space are so desperately needed it seems absurd to have such beautiful space open on rare occasions for a select few. It makes what land is available impossible and unsafe to use because of overcrowding. I ask that my comments be included in support of non-supervised public access on the FifieldCahill (Bay Area Ridge) Trail. Thank you,” (Caroline Tonetti, Email, July 9, 2020)

“I am an indirect SFPUC ratepayer from the city of Half Moon Bay. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR. **I am OPPOSED to UNSUPERVISED access.**

I have been lucky enough to have been invited in to ride horseback in the watershed with one of the water and soils scientists who lived with his family in one of the houses inside the watershed. This is a fragile ecosystem, and one of the only wild places left on the peninsula. The animal and plant life that thrive in the watershed will not be able to withstand the onslaught of today's typical careless tourist. I have lived in Half Moon Bay since 1981, and have seen year over year the erosion, trash and general disrespect of our local beaches as well as Hatches Woods and Purissima Creek park. People don't listen, don't pay attention and are selfish. If you want trash in the Crystal Springs lakes, eroded trails, and habitat loss to build the

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parking lots required for all the tourists, then please don't raise my water rates to pay for this incursion. There is a reason that this land has been largely hidden from the public.

The Watershed property is some of the most historically important in California. This is a cultural heritage issue for native Californians and newcomers alike. The EIR could address this importance through *a more accessible appointment system* enabling carefully planned, docent led tours for the public to visit historical sites in the Watershed property.

Again, I am **OPPOSED** to *unsupervised* access to the San Francisco Watershed property.” (April Turner, Email, August 7, 2020)

“I would recommend Alternative D: different trail proposal eliminating SSBTE on Kings Mountain.” (Jean Turri, Email, August 9, 2020)

“What were you thinking??? Mountain biking and trail-building destroy wildlife habitat! Mountain biking is environmentally, socially, and medically destructive! There is no good reason to allow bicycles on any unpaved trail!

There is absolutely no good reason to build huge trails circling the Bay Area. That will destroy a huge amount of wildlife habitat, and provide zero benefit to the wildlife. You don't teach conservation by doing the opposite!

This project would destroy wildlife habitat in order to provide access that is already provided by State Route 35, just a few hundred feet to the west! I support Alternative A, No Project Alternative. To be perfectly clear, I oppose all new trail construction and all mountain biking on unpaved trails. Both destroy wildlife habitat.” (Mike Vandeman, Email, June 27, 2020)

“I'm an avid cyclist living in Palo Alto. I very much support the building of new trails that make cycling safer and more accessible. I love it when new areas are opened and I can see just how beautiful our region is.

Skyline Blvd is a beautiful road but can be very scary with all the high-speed cars and motorcycles. This new trail would be a great resource.” (Keith Vetter, Email, August 5, 2020)

“My brother lives in San Mateo off the Bunker Hill exit and I live in SF in Bernal Heights and we are both avid bikers. It would be amazing to ride to his place or vice versa or ride together on this incredible resource. I have only managed to do the docent-led trail once but would definitely purchase a pass. Given the length, we should also allow electric bikes to increase the number of people who can enjoy this trail. It will defray costs for other trails and improve health and wellbeing of our community. Thanks for all that you do to help manage our public resources.” (Jeff Vroom, Email, July 11, 2020)

“As a resident of El Granada west of the crystal springs water shed I am strongly opposed to opening the watershed for general public activity. My reasons concern the fire dangers and the increased cost of the necessary oversight that would be needed. The hiking reservation program to access the area if still in effect provides the means to enjoy a beautiful area perhaps it could be expanded to accommodate more hikers. Thank you.” (Steve Walsh, Email, August 9, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail. Please look to the other open watersheds in the SF Bay Area that have successfully allowed non-supervised public access as an example for the opening the SF Watershed. The SF Watershed already has roads in place that are used by Watershed vehicles. The public should be allowed to use these same roads for non-supervised hiking, biking, and equestrian access. I have lived near the borders of the SF Watershed for 40 years and have longed to enjoy the area responsibly and have been deeply saddened by the lack of public access to public lands.” (James Weber, Email, June 29, 2020)

“I am writing to support the proposed Southern Skyline Boulevard Ridge Trail Extension Project (variant 2). As a frequent cyclist, I would greatly benefit from a fenced bike path alternative to Skyline Boulevard, and being able to use the proposed trail on an unpermitted basis would support more regular use. If it's not possible to pass variant 3, I would also be supportive of variant 2 as an alternative. Variant 1 seems prohibitive enough that I wouldn't personally be able to access this new trail extension.” (Maggie White, Email, August 10, 2020)

“I am a San Francisco home owner residing writing in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project. The plan should proceed forward with none of the proposed alternatives. This project is overdue. It should have been completed in 2018 per the description published on sfwater.org. I a regular cyclist around the watershed and have done the docent program twice. Trails on the peninsula are seeing much more traffic this year. I bicycle and drive Skyline often. It's time to create a safe and beautiful alternative. This trail will save human lives and inspire volunteers to care for the surrounding environment.

I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use.” (Joel Winter, Email, August 9, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Chris Wood, Email, July 5, 2020)

“I live in San Francisco (28 years) and am excited to hear about the proposed Southern Skyline Boulevard Ridge Trail Extension Project.” (Joyce Ycasas, Email, July 23, 2020)

“Outdoor access to the beautiful propsed route is such a boon to the physical and mental health of locals! It is a priceless community project during these restricted times, for everyone in the immediate and surrounding communities. Opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use is GREAT idea. Thank you for your consideration of the best plan for this Ridge Trail extension.” (Joyce Ycasas, Email, July 23, 2020)

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.

Please open this jewel of a walking trail to the public. Especially in times of pandemic we have learned how critically important It is to have access to plenty of great walking trails open to the public. As a busy

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parent I tend to make last minute plans and the docent program has never fit into those plans.” (Daniel Yost, Email, July 4, 2020)

“Since I moved from Marin to San Mateo six years ago, I have always been perplexed as to why such vast open spaces with so many trails surrounding the water shed are unaccusable to the public for responsible trail use.

In Marin, most all Water District fire roads are open for use and provide recreation as well as a sense of belonging within the community.

It has been my experience that in general people who spend the time and energy to visit these places do so because they respect them. These lands belong to all of us in one way or another and reasonable access should be allowed.

I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Peter Zampino, Email, July 6, 2020)

“As an avid cyclist based in San Francisco who often rides directly to Peninsula trails from the city, I am writing to express support for the proposed Southern Skyline Boulevard Ridge Trail Extension Project. This would enable safer off-road riding as an alternative to biking on Skyline Blvd itself to Purisima Creek and El Corte de Madera OSPs. I support expanded and flexible access to the Fifield-Cahill ridge trail and therefore support Access Variant 2 or 3.” (Darren Zhu, Email, August 10, 2020)

REPRESENTATIVE COMMENTS

This response also addresses the following comments, which are similar or identical to the representative comment quoted below:

GC-2 REPRESENTATIVE COMMENT 1

I-Alcorn.1, I-Allen.1, I-Anagnoson.1, I-Arbizu.1, I-Arena.1, I-Arnold_T.1, I-Basin.1, I-Bernstein.1, I-Bigbee.1, I-Black.1, I-Blockstein.1, I-Boltin.1, I-Borelli.1, I-Bridgeman-2.1, I-Bushue.1, I-Camerlengo.1, I-Carroll.1, I-Carter-2.1, I-Case.1, I-Chase.1, I-Chen.1, I-Clarke.1, I-Cooper.1, I-Crater.1, I-Cuff.1, I-Dat.1, I-Dell.1, I-Deutscher.1, I-Dickstein.1, I-Eberle.1, I-Eichel.1, I-Enevoldsen.1, I-Enns.1, I-Esteban.1, I-Fong.1, I-Forter.1, I-Garcia.1, I-Gilmore.1, I-Gipp.1, I-Golembiewski.1, I-Gonzales.1, I-Greene.1, I-Hall_B.1, I-Hall-Snyder.1, I-Harvey.1, I-Heitkamp.1, I-Heyden.1, I-Hoffman.1, I-Huang.1, I-Janson.1, I-Key.1, I-Krensky.1, I-Kropp.1, I-Kunz.1, I-Lee_D.1, I-Lehane.1, I-Lesher.1, I-Lider-2.1, I-Long.1, I-Luke.1, I-Lunders.1, I-MacDonald.1, I-Martin_K.1, I-Martin_N.1, I-Mercay.1, I-Mitchell.1, I-Morse.1, I-Mui.1, I-Nauchury.1, I-Neufeld.1, I-Paley.1, I-Paulsen.1, I-Quinn.1, I-Reddig.1, I-Rhodes.1, I-Ries.1, I-Rivera.1, I-Rogers.1, I-Rosenblatt.1, I-Rosenthal.1, I-Rosoff.1, I-Scareborough.1, I-Self.1, I-Shukis.1, I-Shuler.1, I-Shute.1, I-Simnett.1, I-Slezak.1, I-Smith_A.1, I-Smoot.1, I-Sontag.1, I-Stanke.1, I-Stern.1, I-Strahorn.1, I-Swanson.1, I-Switzer.1, I-Taylor_W.1, I-Taylor_K.1, I-Tepedelenioglu.1, I-Towey.1, I-Upp.1, I-Vaughan.1, I-Wegner.1, I-Weil.1, I-Wild.1, I-Wilson.1, I-Winsor.1, I-Wisniewski.1, I-Woodward.1, I-Wynne.1, I-Young.1

“I am a resident of Oakland. I am writing on behalf of the Bay Area Ridge Trail in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project. I support the staff recommended project and

access program.” (Susan Alcorn, Email, August 4, 2020; Scott Allen, Email, August 10, 2020; Rob Anagnoson, Email, August 9, 2020; Margarita Arbizu, Email, August 5, 2020; Chris Arena, Email, August 9, 2020; Tom Arnold, Email, August 5, 2020; Cheryl Basin, Email, August 6, 2020; Max Bernstein, Email, August 10, 2020; Paul Bigbee, Email, August 6, 2020; Carlin Black, Email, August 4, 2020; Sue Blockstein, Email, August 2, 2020; Iain Boltin, Email, August 4, 2020; Beverley Borelli, Email, August 4, 2020; Carole Bridgeman, Email, August 9, 2020; Mike Bushue, Email, August 7, 2020; Judy Camerlengo, Email, August 5, 2020; Jessica Carroll, Email, August 9, 2020; Jonathan Carter, Email, August 4, 2020; Sarah Case, Email, August 6, 2020; Laurie Chase, Email, August 5, 2020; Mich Chen, Email, August 4, 2020; James Clarke, Email, August 6, 2020; Cameron Cooper, Email, August 9, 2020; Bonnie Crater, Email, August 4, 2020; Kermit Cuff, Email, July 23, 2020; Ted Dat, Email, August 7, 2020; Stephen Dell, Email, August 5, 2020; Kathy Deutscher, Email, August 5, 2020; Leah Dickstein, Email, August 10, 2020; Stefan Eberle, Email, August 7, 2020; Kelsie Eichel, Email, August 4, 2020; Claus Enevoldsen, Email, August 4, 2020; Steven Enns, Email, August 5, 2020; Gregory Esteban, Email, August 5, 2020; Norman Fong, Email, August 9, 2020; John Forter, Email, August 4, 2020; Carlos Garcia, Email, August 6, 2020; Meg Gilmore, Email, July 23, 2020; Nicole Gipp, Email, August 9, 2020; Mark Golembiewski, Email, August 4, 2020; Robert Gonzales, Email, August 4, 2020; Thomas Greene, Email, August 6, 2020; Brad Hall, Email, August 5, 2020; Nathan Hall-Snyder, Email, August 10, 2020; Sean Harvey, Email, August 4, 2020; Ross Heitkamp, Email, August 8, 2020; Neil Heyden, Email, August 4, 2020; Dan Hoffman, Email, August 4, 2020; Kathy Huang, Email, August 5, 2020; Nils Janson, Email, August 8, 2020; Charles Key, Email, August 6, 2020; Rob Krensky, Email, August 4, 2020; Mason Kropp, Email, August 4, 2020; John Kunz, Email, August 4, 2020; Donovan Lee, Email, August 7, 2020; Michael Lehane, Email, August 10, 2020; Ted Leshner, Email, August 9, 2020; Brett Lider, Email, August 7, 2020; Warren Long, Email, August 5, 2020; Lawrence Luke, Email, August 5, 2020; Ken Lunders, Email, July 23, 2020; Scott MacDonald, Email, August 9, 2020; Kurt Martin, Email, August 10, 2020; Nancy Martin, Email, August 4, 2020; Julien Mercay, Email, August 7, 2020; Marc Mitchell, Email, August 6, 2020; Joe Morse, Email, August 5, 2020; Andrew Mui, Email, August 4, 2020; Maxence Nachury, Email, August 4, 2020; Jan Neufeld, Email, August 5, 2020; Daniel Paley, Email, August 4, 2020; David Paulsen, Email, August 4, 2020; Adda Quinn, Email, August 7, 2020; Randy Reddig, Email, August 9, 2020; Karen, Rhodes, Email, August 10, 2020; Paul Ries, Email, August 10, 2020; Joe Rivera, Email, July 23, 2020; Brian Rogers, Email, August 5, 2020; Bettina Rosenblatt, Email, August 8, 2020; Cindy Rosenthal, Email, August 4, 2020; John Rosoff, Email, August 9, 2020; Robert Scarborough, Email, August 4, 2020; Matthew Self, Email, August 4, 2020; Warren Shukis, Email, August 4, 2020; John Shuler, Email, August 7, 2020; Jeff Schute, Email, August 8, 2020; Sarah Simnett, Email, August 10, 2020; Doug Slezak, Email, August 6, 2020; Alan Smith, Email, August 5, 2020; Steve Smoot, Email, August 5, 2020; Carol Sontag, Email, July 23, 2020; Fred Stanke, Email, August 4, 2020; Kathleen Stern, Email, August 4, 2020; Chris Strahorn, Email, August 8, 2020; Stacey Swanson, Email, August 4, 2020; Cathy Switzer, Email, August 8, 2020; Kent Taylor, Email, August 4, 2020; Warrick Taylor, Email, August 5, 2020; Emre Tepedelenlioglu, Email, August 9, 2020; David Towey, Email, August 10, 2020; Rex Upp, Email, August 4, 2020; Brandon Vaughan, Email, August 10, 2020; Glenn and Linda Wegner, Email, August 8, 2020; Nina Weil, Email, August 5, 2020; Lani Wild, Email, August 5, 2020; Bryan Wilson, Email, August 4, 2020; Charity Winsor, Email, August 4, 2020; Damian Wisniewski, Email, August 10, 2020; Ted Woodward, Email, August 10, 2020; Sara Wynne, Email, August 4, 2020; Neil Young, Email, August 10, 2020)

GC-2 REPRESENTATIVE COMMENT 2

I-Alcorn.3, I-Allen.3, I-Anagnoson.3, I-Arbizu.3, I-Arena.3, I-Arnold_T.3, I-Basin.3, I-Bernstein.3, I-Bigbee.3, I-Black.3, I-Blockstein.3, I-Boltin.3, I-Borelli.3, I-Bridgeman-2.3, I-Bushue.3, I-Camerlengo.3, I-Carroll.3, I-Carter-2.3, I-Case.3, I-Chase.3, I-Chen.3, I-Clarke.3, I-Cooper.3, I-Crater.3, I-Cuff.3, I-Dat.3, I-Dell.3, I-Deutscher.3, I-Dickstein.3, I-Eberle.3, I-Eichel.3, I-Enevoldsen.3, I-Enns.3, I-Esteban.3, I-Fong.3, I-Forter.3, I-Garcia.3, I-Gilmore.3, I-Gipp.3, I-Golembiewski.3, I-Gonzales.3, I-Greene.3, I-Hall_B.3, I-Hall-Snyder.3, I-Harvey.3, I-Heitkamp.3,

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I-Heyden.3, I-Hoffman.3, I-Huang.3, I-Janson.3, I-Key.3, I-Krensky.3, I-Kropp.3, I-Kunz.3, I-Lee_D.3, I-Lehane.3, I-Lesher.3, I-Lider-2.3, I-Long.3, I-Luke.3, I-Lunders.3, I-MacDonald.3, I-Martin_N.3, I-Martin_K.3, I-Mercay.3, I-Mitchell.3, I-Morse.3, I-Mui.3, I-Nauchury.3, I-Neufeld.3, I-Paley.3, I-Paulsen.3, I-Quinn.3, I-Reddig.3, I-Rhodes.3, I-Ries.3, I-Rivera.3, I-Rogers.3, I-Rosenblatt.3, I-Rosenthal.3, I-Rosoff.3, I-Scarborough.3, I-Self.3, I-Shukis.3, I-Shuler.3, I-Shute.3, I-Simnett.3, I-Smith_A.3, I-Smoot.3, I-Sontag.3, I-Stanke.3, I-Stern.3, I-Strahorn.3, I-Swanson.3, I-Switzer.3, I-Taylor_W.3, I-Taylor_K.3, I-Tepedelenlioglu.3, I-Towey.3, I-Upp.3, I-Vaughan.3, I-Wegner.3, I-Weil.3, I-Wild.3, I-Wilson.3, I-Winsor.3, I-Wisniewski.3, I-Woodward.3, I-Wynne.3, I-Young.3

“Public access to the outdoors is important to me and my community. I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use.” (Susan Alcorn, Email, August 4, 2020; Scott Allen, Email, August 10, 2020; Rob Anagnoson, Email, August 9, 2020; Margarita Arbizu, Email, August 5, 2020; Chris Arena, Email, August 9, 2020; Tom Arnold, Email, August 5, 2020; Cheryl Basin, Email, August 6, 2020; Max Bernstein, Email, August 10, 2020; Paul Bigbee, Email, August 6, 2020; Carlin Black, Email, August 4, 2020; Sue Blockstein, Email, August 2, 2020; Iain Boltin, Email, August 4, 2020; Beverley Borelli, Email, August 4, 2020; Carole Bridgeman, Email, August 9, 2020; Mike Bushue, Email, August 7, 2020; Judy Camerlengo, Email, August 5, 2020; Jessica Carroll, Email, August 9, 2020; Jonathan Carter, Email, August 4, 2020; Sarah Case, Email, August 6, 2020; Laurie Chase, Email, August 5, 2020; Mich Chen, Email, August 4, 2020; James Clarke, Email, August 6, 2020; Cameron Cooper, Email, August 9, 2020; Kermit Cuff, Email, July 23, 2020; Ted Dat, Email, August 7, 2020; Stephen Dell, Email, August 5, 2020; Kathy Deutscher, Email, August 5, 2020; Leah Dickstein, Email, August 10, 2020; Stefan Eberle, Email, August 7, 2020; Kelsie Eichel, Email, August 4, 2020; Claus Enevoldsen, Email, August 4, 2020; Steven Enns, Email, August 5, 2020; Gregory Esteban, Email, August 5, 2020; Norman Fong, Email, August 9, 2020; John Forter, Email, August 4, 2020; Carlos Garcia, Email, August 6, 2020; Meg Gilmore, Email, July 23, 2020; Nicole Gipp, Email, August 9, 2020; Mark Golembiewski, Email, August 4, 2020; Robert Gonzales, Email, August 4, 2020; Thomas Greene, Email, August 6, 2020; Brad Hall, Email, August 5, 2020; Nathan Hall-Snyder, Email, August 10, 2020; Sean Harvey, Email, August 4, 2020; Ross Heitkamp, Email, August 8, 2020; Neil Heyden, Email, August 4, 2020; Dan Hoffman, Email, August 4, 2020; Kathy Huang, Email, August 5, 2020; Nils Janson, Email, August 8, 2020; Charles Key, Email, August 6, 2020; Rob Krensky, Email, August 4, 2020; Mason Kropp, Email, August 4, 2020; John Kunz, Email, August 4, 2020; Donovan Lee, Email, August 7, 2020; Michael Lehane, Email, August 10, 2020; Ted Lesher, Email, August 9, 2020; Brett Lider, Email, August 7, 2020; Warren Long, Email, August 5, 2020; Lawrence Luke, Email, August 5, 2020; Ken Lunders, Email, July 23, 2020; Scott MacDonald, Email, August 9, 2020; Kurt Martin, Email, August 10, 2020; Nancy Martin, Email, August 4, 2020; Julien Mercay, Email, August 7, 2020; Marc Mitchell, Email, August 6, 2020; Joe Morse, Email, August 5, 2020; Andrew Mui, Email, August 4, 2020; Maxence Nachury, Email, August 4, 2020; Jan Neufeld, Email, August 5, 2020; Daniel Paley, Email, August 4, 2020; David Paulsen, Email, August 4, 2020; Adda Quinn, Email, August 7, 2020; Randy Reddig, Email, August 9, 2020; Karen, Rhodes, Email, August 10, 2020; Paul Ries, Email, August 10, 2020; Joe Rivera, Email, July 23, 2020; Brian Rogers, Email, August 5, 2020; Bettina Rosenblatt, Email, August 8, 2020; Cindy Rosenthal, Email, August 4, 2020; John Rosoff, Email, August 9, 2020; Robert Scarborough, Email, August 4, 2020; Matthew Self, Email, August 4, 2020; Warren Shukis, Email, August 4, 2020; John Shuler, Email, August 7, 2020; Jeff Schute, Email, August 8, 2020; Sarah Simnett, Email, August 10, 2020; Alan Smith, Email, August 5, 2020; Carol Sontag, Email, July 23, 2020; Fred Stanke, Email, August 4, 2020; Kathleen Stern, Email, August 4, 2020; Chris Strahorn, Email, August 8, 2020; Stacey Swanson, Email, August 4, 2020; Cathy Switzer, Email, August 8, 2020; Kent Taylor, Email, August 4, 2020; Warrick Taylor, Email, August 5, 2020; Emre Tepedelenlioglu, Email, August 9, 2020; David Towey, Email, August 10, 2020; Rex Upp, Email, August 4, 2020; Brandon Vaughan, Email, August 10, 2020; Glenn and Linda Wegner, Email, August 8, 2020; Nina Weil, Email, August 5, 2020; Lani Wild, Email, August 5, 2020; Bryan Wilson, Email, August 4, 2020; Charity Winsor, Email, August 4, 2020; Damian Wisniewski, Email, August 10, 2020; Ted Woodward, Email, August 10, 2020; Sara Wynne, Email, August 4, 2020; Neil Young, Email, August 10, 2020)

GC-2 REPRESENTATIVE COMMENT 3

I-Allanson.1, I-Alldredge.1, I-Barton.1, I-Buch.1, I-Clutton.1, I-Curd.1, I-Dods.1, I-Emanuel.1, I-Fenichel.1, I-Fritze.1, I-Goldenberg.1, I-Golshan.1, I-Guerra-2.1, I-Larsen_S.1, I-Louis.1, I-Manning.1, I-Matera.1, I-Mercado.1, I-Ocampo.1, I-Oh.1, I-Olson.1, I-Peyronel.1, I-Potis.1, I-Schwesig.1, I-Scovill-2.1, I-Sivarajah_M.1, I-Stocker.1, I-Szybalski.1, I-Vance.1, I-Willcox.1, I-Zavestoski.1

“I am a resident of San Francisco, CA. I am writing in support of the proposed Southern Skyline Boulevard Ridge Trail Extension Project and would like my comments to be made part of the public record. I support the staff recommended project with unsupervised access, particularly access variants 2 or 3.

Public access to the outdoors is important to me and my community, particularly during these pandemic times. I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use.” (Karen Allanson, Email, August 10, 2020; Piper Alldrege, Email, August 7, 2020; Terry Barton, Email, August 10, 2020; Vineet Buch, Email, August 9, 2020; Chris Clutton, Email, August 24, 2020; John Curd, Email, August 8, 2020; Suzie Dods, Email, August 10, 2020; Alex Emanuel, Email, August 6, 2020; Rachel Fenichel, Email, August 10, 2020; Christian Fritze, Email, August 10, 2020; Benjamin Goldenberg, Email, August 7, 2020; Nathan Golshan, Email, August 10, 2020; David Guerra, Email, July 23, 2020; Scot Larsen, Email, August 9, 2020; Tim Louis, Email, August 8, 2020; Jordan Manning, Email, August 7, 2020; Matthew Matera, Email, August 10, 2020; Abel Mercado, Email, August 9, 2020; Pamela Ocampo, Email, August 7, 2020; Jenny Oh, Email, August 7, 2020; Anna Olson, Email, August 9, 2020; Thibault Peyronel, Email, August 8, 2020; John Potis, Email, August 11, 2020; Carsten Schwesig, Email, August 7, 2020; Will Scovill, Email, July 24, 2020; Mythily Sivarajah, Email, August 9, 2020; Eric Stocker, Email, August 7, 2020; Andy Szybalski, Email, August 10, 2020; Wyles Vance, Email, August 8, 2020; Michelle Willcox, Email, August 8, 2020; Stephen Zavestoski, Email, August 8, 2020)

GC-2 REPRESENTATIVE COMMENT 4

I-Allemand.1, I-Applewhite.1, I-Arnold_J.1, I-Armer.1, I-Ashley.1, I-Axelrod.1, I-Baldwin.1, I-Benioff.1, I-Bergman.1, I-Bobier.1, I-Brady.1, I-Bryan.1, I-Burger.1, I-Cancell.1, I-Clark_M.1, I-Corley.1, I-Crow.1, I-Davis.1, I-Drazic.1, I-Drouin.1, I-Dsouza.1, I-Eckelmeyer.1, I-Eisen.1, I-Ellison.1, I-Evanston.1, I-Forrister.1, I-Giusti.1, I-Goldstein.1, I-Goodrum.1, I-Haydon.1, I-Hiestand.1, I-Homan.1, I-Ingram.1, I-Kaye.1, I-King_K.1, I-King_S.1, I-Korbholz_W.1, I-Langham.1, I-Liebes_L.1, I-Lubin.1, I-MacKenzie.1, I-Marbury.1, I-Martin_D.1, I-McBride.1, I-McKnight.1, I-Moore_D.1, I-Moore_R.1, I-Morey.1, I-Newlands.1, I-Nye.1, I-Perrone.1, I-Pielenz.1, I-Rarback.1, I-Ray.1, I-Schryver.1, I-Smith_S.1, I-Snyder.1, I-Spak.1, I-Spangler_M.1, I-Trapp.1, I-VanSchoyck.1, I-Walczak.1, I-Warne.1, I-Willard.1, I-Wright.1, I-Wyman.1, I-Zamel.1, I-Zermeno.1

“I support the proposal by the San Francisco Public Utilities Commission to expand the existing docent program on the Fifield Cahill ridge trail, construct a new half-mile long ADA trail accessed from the Fifield Cahill ridge trail (both north of Highway 92), and a new six-mile long trail along the east side of Skyline Boulevard extending south from Highway 92 to the Phleger Estate (GGNRA) in Woodside. This proposal will protect wildlife habitat and drinking water quality while providing appropriate public access.” (Sofia Allemand, Email, August 7, 2020; Anthony Applewhite, Email, August 6, 2020; Joan Armer, Email, August 6, 2020; John Arnold, Email, August 6, 2020; Kate Ashley, Email, August 6, 2020; David Axelrod, Email, August 7, 2020; Donald Baldwin, Email, August 6, 2020; Jeanne Benioff, Email, August 6, 2020; Claudette Bergman, Email, August 6, 2020; Kristine Bobier, Email, August 7, 2020; William Brady, Email, August 7,

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2020; Susan Bryan, Email, August 7, 2020; Ursula Burger, Email, August 6, 2020; June Cancell, Email, August 6, 2020; Matthew Clark, Email, August 7, 2020; Kristi Corley, Email, August 6, 2020; Carolyn Crow, Email, August 6, 2020; Janet Davis, Email, August 6, 2020; Stephanie Drazic, Email, August 7, 2020; Lisane Drouin, Email, August 6, 2020; Gladwyn DSouza, Email, August 6, 2020; Karin Eckelmeyer, Email, August 6, 2020; Adam Eisen, Email, August 7, 2020; Sally Ellison, Email, August 6, 2020; Luci Evanston, Email, August 7, 2020; Ann Forrister, Email, August 6, 2020; William Giusti, Email, August 6, 2020; Chip Goldstein, Email, August 7, 2020; James Goodrum, Email, August 7, 2020; Noah Haydon, Email, August 6, 2020; Susan Hiestand, Email, August 7, 2020; William Homan, Email, August 6, 2020; Peter Ingram, Email, August 10, 2020; Theodore Kaye, Email, August 6, 2020; Kenneth King, Email, August 7, 2020; Steven King, Email, August 6, 2020; William Korbholze, Email, August 6, 2020; Kevin Langham, Email, August 6, 2020; Linda Liebes, Email, August 7, 2020; Thalia Lubin, Email, August 6, 2020; Michelle Mackenzie, Email, August 6, 2020; Janet Marbury, Email, August 6, 2020; Deirdre Martin, Email, August 7, 2020; Lori McBride, Email, August 6, 2020; Robin McKnight, Email, August 9, 2020; David Moore, Email, August 6, 2020; Rhoda Moore, Email, August 6, 2020; Gail Morey, Email, August 8, 2020; Allan Newlands, Email, August 8, 2020; Adelaide Nye, Email, August 6, 2020; David Perrone, Email, August 6, 2020; Christine Pielenz, Email, August 8, 2020; Harvey Rarback, Email, August 6, 2020; Kathleen Ray, Email, August 7, 2020; Thomas Schryver, Email, August 6, 2020; Sarah Smith, Email, August 6, 2020; John Snyder, Email, August 6, 2020; Margar Spak, Email, August 6, 2020; Mary Spangler, Email, August 6, 2020; Onnolee Trapp, Email, August 6, 2020; Manon VanSchoyck, Email, August 6, 2020; Susan Walczak, Email, August 6, 2020; Kathy Warne, Email, August 8, 2020; Ann Willard, Email, August 7, 2020; Beverly Wright, Email, August 6, 2020; Will Wyman, Email, August 6, 2020; Karen Zamel, Email, August 6, 2020; E. Zermeno, Email, August 6, 2020)

GC-2 REPRESENTATIVE COMMENT 5

I-Brown.1, I-Clark_D.1, I-Cordes.1, I-DeAngelis.1, I-Hofland.1, I-Johnson_J.1, I-Kirschling.1, I-McEntee.1, I-Morris.1, I-Weiden.1

“I am writing in support of Alternative B for the Southern Skyline Boulevard Ridge Trail Extension Project. The Draft Environmental Impact Report (EIR) for the proposed project has identified Alternative B as the environmentally superior alternative. Alternative B maintains and improves the existing docent program for hikers, cyclists, and equestrians on Fifield-Cahill Ridge. It also proposes to allow unsupervised access to a new six-mile trail in a less environmentally sensitive area along the east side of Skyline Boulevard, extending south from Highway 92 to the Phleger Estate outside Woodside.” (Phyllis Brown, Email, August 5, 2020; David Clark, Email, July 11, 2020; John Cordes, Email, July 21, 2020; Matt DeAngelis, Email, July 12, 2020; Freda Hofland, Email, July 12, 2020; Jonathan Johnson, Email, July 17, 2020; Karen Kirschling, Email, July 13, 2020; Shannon Rose McEntee, Email, July 11, 2020; Emily Morris, Email, July 12, 2020; Cheryl Weiden, Email, July 11, 2020)

GC-2 REPRESENTATIVE COMMENT 6

I-Gedgafov_V.1, I-Gedgafov_V-2.1, I-Hagberg.1, I-Howitson.1, I-Hutchinson.1, I-Jacobs.1, I-Jen.1, I-Kawaja.1, I-Kenin-2.1, I-Mar.1, I-McGee.1, I-Perez-Vargas.1, I-Ratcliffe.1, I-Redalen.1, I-Rosekind.1, I-Schroeder.1, I-Scovill-1.1, I-Sinks.1, I-Trewin.1

“I ask that my comments be included in support of non-supervised public access on the Fifield-Cahill (Bay Area Ridge) Trail.” (Vladimir Gedgafov, Email, June 26, 2020; Vladimir Gedgafov, Email, July 4, 2020; Sharon

Hagberg, Email, June 27, 2020; Mark Howitson, Email, June 30, 2020; Jeff Hutchinson, Email, July 5, 2020; Tori Jacobs, Email, July 6, 2020; Bobby Jen, Email, July 2, 2020; Jon Kawaja, Email, July 3, 2020; Alexandra Kenin, Email July 6, 2020; Henry Mar, Email, July 10, 2020; Todd McGee, Email, June 25, 2020; Sandra Perez-Vargas, Email, July 9, 2020; Jim Ratcliffe, Email, June 27, 2020; Aaron Redalen, Email, June 25, 2020; Stephanie Rosekind, Email, July 4, 2020; Marc Schroeder, Email, July 4, 2020; William Scovill, Email, June 28, 2020; Gus Sinks, Email, July 23, 2020; Laura Trewin, Email, June 30, 2020)

GC-2 REPRESENTATIVE COMMENT 7

I-Adams.1, I-Paton.1, I-Stringer-Calvert.1, I-Thomas.1

“I am an SFPUC ratepayer from the city of San Francisco. I would like my comments to be part of the public record on the Fifield-Cahill (Bay Area Ridge) Trail EIR. In support of non-supervised access. Particularly Access Variants, 2 or 3.” (Jan Adams, Email, August 6, 2020; Laura Paton, Email, August 3, 2020; David Stringer-Calvert, Email, August 2, 2020; Winston Thomas, Email, August 4, 2020)

GC-2 REPRESENTATIVE COMMENT 8

I-Adams.3, I-Paton.3, I-Stringer-Calvert.3, I-Thomas.3

“The Watershed property is some of the most historically important in California. And some of the most hidden from the public. This is a cultural heritage issue for native Californians and newcomers alike. The EIR should address this importance, the unmet public need to visit historical sites in the Watershed property. I support unsupervised public access in the SF Watershed.” (Jan Adams, Email, August 6, 2020; Laura Paton, Email, August 3, 2020; David Stringer-Calvert, Email, August 2, 2020; Winston Thomas, Email, August 4, 2020)

RESPONSE GC-2

The topics represented in the comments presented generally concern statements of support opposition, or opinions concerning the merits of the proposed project. The comments include general statements about the implications of project implementation related to historic sites, transportation, plants and animals, soils, water quality, and wildfire hazards. The comments also include statements of preference and opinion regarding for trail design, project amenities, and access configurations.

Some comments (e.g., O-GGAudubon.2, O-POST.1, I-Mercer.1) briefly mention environmental concerns or issues as the basis for the commenters’ support, opposition and opinion. The commenters expand upon these issues and concern in other comments. These more detailed and topic-specific comments are presented and responses provided in the corresponding Chapter 11 section of this RTC. For commenters’ reference, the EIR presents project description details in Chapter 2, and evaluates potential project effects on historic resources in Section 4.3, transportation in Section 4.4, plants and animals in Section 4.8, soils in Section 4.9, water quality in Section 4.10, and wildfire hazards in Section 4.11. Responses to comments related to the project

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description are addressed in Section 11.2, transportation in Section 11.4, plants and animals in Section 11.6, water quality in Section 11.7, and wildfire hazards in Section 11.8 of this RTC.

Comments expressing support, opposition, or general opinion do not raise specific issues concerning the adequacy or accuracy of the EIR's coverage of physical impacts that require a response in this RTC document under CEQA Guidelines section 15088. However, such comments, including recommendations for project modifications, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

Comment GC-3: Equitable Access and Expanded Educational Offerings

INDIVIDUAL COMMENTS

This response addresses the following individual comments, which are quoted below:

A-CPC-Chan.2, O-BARTC-1.6, O-GreenFoothills.7, O-POST.2, I-Adams.2, I-Bartholomew.2, I-Brousseau-8.3, I-Brousseau-10.2, I-Chaney.2, I-Coyne.2, I-de la Rosa.2, I-de la Rosa.4, I-Drees.4, I-Emanuel.2, I-Evans.2, I-Fox.5, I-Golshan.2, I-Heitkamp.4, I-Johnson_M.3, I-Mackey.4, I-Naranjo-1.2, I-Ozaki.3, I-Qian.2, I-Romano.2, I-Scovill-2.2, I-Smetters.4, I-Spangler_J.2, I-Strnad.1, I-Wood.2

“But I also hope that we're able to evaluate these options with an eye toward who's really able to access these, this resource. So for example, you know, there are studies showing that black and Latino populations are underrepresented visitors to our national public lands, relative to their share of the population at large. So I would really hope to see that this project is consistent with, you know, the open space and recreation element of the General Plan, and especially around Guiding Principle 3, around equity and accessibility, so that we are able to provide open space and recreational programs that are accessible to, you know, all workers, residents and visitors. And so, I think, moving forward, it'd be really helpful to evaluate the access options relative to if there are kind of existing social economic data about who is participating in the docent and permit programs, just to get a sense of whether these programs have been accessible to all, and to consider these access options relative to that. And I did want to note that access is really more than just ability to, you know, go on the internet and apply for a permit. It really runs, you know, I think much deeper, in terms of removing cultural barriers, in terms of some groups might not feel that outdoor recreation or hiking is something that they are familiar with, or it feels accessible to them. There's a certain amount of know-how around equipment, preparation and so forth. And I'd just really encourage us to kind of think about reaching out to nonprofit groups that have been working to expand access to youth who have not traditionally had the ability to access outdoor education, and just really want to respectfully suggest that for future access options, kind of consider targeted outreach to these for education. Thank you.” (Deland Chan, Planning Commission, Hearing Comments, July 23, 2020)

“While not directly related to the DEIR, the Council would also like to take this opportunity to encourage SFPUC to expand educational offerings through the docent access program on Fifield Cahill to increase the value of the trail to the public. In these unprecedented times, as parks and open space areas around the Bay Area are experiencing increased visitation, inclusive and accessible recreation is essential. This

would be an opportune time to expand the docent access program on Fifield Cahill to include additional opportunities for educational programming will greatly increase the value of the docent program and aid in growing the next generation of stewards and responsible trail users.” (Janet McBride, Bay Area Ridge Trail Council, Email, August 6, 2020)

“Finally, although not directly related to the DEIR, we strongly encourage the SFPUC to establish new initiatives that will enable people from disadvantaged and/or underserved communities to enjoy the trails within the Watershed. These new initiatives can help meet important City goals of diversity, equity and inclusion and will help foster appreciation of the Watershed’s values.” (Lennie Roberts, Green Foothills, Email, August 10, 2020)

“Equitable Access: We appreciate that the Project's proposed access program on the southern skyline extension will be accessible via public transportation with a bus stop on Highway 92 near the trailhead. We support the use of a permit system to manage access. Permit systems can present a barrier to some users, including those who do not have regular access to the internet.

POST recommends that public use is monitored and managed adaptively to ensure that barriers to public access (e.g. cost and access to permits via an online system) are not unintentionally prohibiting this trail (and the educational opportunities to learn about the peninsula watershed lands) from being enjoyed by all.” (Walter Moore, Peninsula Open Space Trust, Email, August 10, 2020).

“I first learned of this issue when I was a freelance journalist for the San Francisco Examiner. When I wrote articles about the efforts to open the Watershed to the public, I originally had no opinion on the matter. But the more I learn, the more I become convinced depriving the public of access to this open space is a terrible injustice and a tragic missed opportunity.

The organizations loudly opposing access to the San Francisco Watershed are mostly made up of white, affluent Mid-Peninsula residents who live in San Mateo County’s wealthiest towns, and thus enjoy unfettered access to a host of excellent parks and open spaces.

The residents of the northern San Mateo County cities closest to the Watershed, and the residents of the city and county of San Francisco, tend to be less white, and less wealthy than, the privileged folks advocating against access.

At this moment in history, when people all over the US are addressing racial inequity with renewed, unprecedented vigor, blocking access to the Fifield-Cahill Trail would put the Planning Commission on the wrong side of history.

Those of us who live in the northern Peninsula’s less affluent cities and towns deserve the interpretive and recreational opportunities currently locked up on the Fifield-Cahill Trail. There is a wealth of history and natural beauty contained in the Watershed. Please allow the people to experience it.” (Brendan Bartholomew, Email, July 20, 2020)

“Importantly, the EIR footnotes on page 115 clearly show that the current docent-led program is a huge barrier to public access to public lands...by killing 94% of the potential visits (only 866 visits on average, versus potential visits of 12,480).

As it turns out, most people can not take the time to do a docent-led tour at 10am on a Tuesday because they are working. Variant 1 (Docent Program) would result in the same unfair access that exists today,

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where a few insiders who are named docents or working for the SFPUC have unlimited, unsupervised access to the Fifiield-Cahill trail themselves, while the general public is locked out. This is a tremendous social justice issue.” (Christopher Brousseau, Email, August 4, 2020)

“You may receive arguments stating that people should not have access at all - or that they should only access this site under extreme measures such as written permits or docent led tours. Importantly, you should know this land is already used by many people who are on the Water Districts inner circle, and the extremely limited availability of current Docent-led tours creates a significant social justice issue for the City of San Francisco, as the Docent Tours are held infrequently, mainly during working hours.

Finally - even land federally designated as Wilderness, the most stringent level of protection available under American law, does not exclude public access. The National Park system, our nation’s system of treasuring and preserving our most important places, is based explicitly on the idea that responsible public access and protection for the environment are mutually reinforcing priorities.” (Christopher Brousseau, Email, July 12, 2020)

“Plus the SF Water Company has tried really hard to make portions available to the public on docent-led walks. I have taken several of these hikes and have found the docents to be well-informed and helpful. Also, SF Water allows groups such as the Mycological Society of SF to enter for mushroom foraging with permits. Access is restricted, but not impossible.” (Carolyn Chaney, Email, July 20, 2020)

“In regard to access, I strongly urge you to adopt Variant 3, which would allow unsupervised access by permit to both the Southern Skyline Ridge Trail and the Fifiield-Cahill Ridge Trail. The existing docent-only program is insufficient and is not real public access. For example, because I don't own a car, I rely on public transit to get to your area and therefore cannot get to the bike tours of the Watershed, which are almost all very early on weekend mornings when public transit is limited or not running.

In 2016, the San Francisco Board of Supervisors considered a resolution urging the PUC to improve public access. PUC representatives, including General Manager Kelly, told the Board of Supervisors that the resolution was unnecessary because the PUC would expand public access imminently. Four years later, we are still waiting. Unsupervised public access is the only way to meet this commitment.” (Brian Coyne, Email, August 10, 2020)

“The current docent guided program has been a huge failure as far as being able to give ratepayers access. I have attempted to take the docent led hike 6 times and was only able to do it once. All the other times it was cancelled stating that there wasn't a guide available at the last minute. When I attempted to be trained to be a docent, all of the classes were cancelled as well.” (Anne de la Rosa, Email, August 9, 2020)

“This is a bit like all the “haves” vs the “have-nots” that have been playing out everywhere over the last few months. This should be egalitarian. Open the Watershed to all!!!” (Anne de la Rosa, Email, August 9, 2020)

“3. The current docent system does not work. My husband submitted a request over a year ago and have not received a response. After not receiving a response, he submitted a request to volunteer as a docent and still received no response. I can only assume that the lack of response, is because the docent program

exists only in name and the lack of response is to keep the public out of the watershed.” (Natalie Drees, Email, August 6, 2020)

“From my personal experience, the docent programs in SFPUC Watershed land are wholly insufficient to provide meaningful access to many, many people including families who could and should be able to enjoy these wonderful, expansive lands and with their important historical and cultural sites.” (Alex Emanuel, Email, August 6, 2020)

“Requiring a docent makes it more difficult for families and working class folks, and the permit is another similar hurdle that would heighten inequitable access.” (Bart Evans, Email, August 8, 2020)

“Considering the totality of the situation, it’s clear we should provide more socially equitable access (non-docent); for nature lovers, before a large fire from the power lines might burn the whole thing down before anyone can see it in our lifetimes. Please do the right thing, and provide equitable access.” (Jamie Fox, Email, August 10, 2020)

“Docent-led access effectively keeps access closed to all members of the community except those who have the time and resources to attend docent-supervised trips, which are almost exclusively during work hours. To put it in terms of the language of the pandemic-almost no one with "Essential Worker" status is going to be able to attend a docent-led tour as they exist today. If public lands are to be opened to public use, they should be realistically and practically accessible to a representative cross-section of the public. Open and unsupervised access is the only way to achieve this.” (Nathan Golshan, Email, August 10, 2020)

“I will say that I support opening the southern Peninsula Watershed lands for more responsible and inclusive recreational use, so it concerns me that you feel the need to make this a permit-required access. I feel that restriction tends to disproportionately restrict access by the underprivileged and those of lower socio-economic standing. It doesn’t really affect me, personally, since this is farther away from my home and I am retired, so I’ll make special plans to visit it, but I know many harder working people will find a short break and just stop by places to explore and will end up turned away, not knowing the secret handshake required for access. I hope that the SFPUC might revisit this restriction after a year to evaluate whether it needs to remain in effect.” (Ross Heitkamp, Email, August 8, 2020)

“Importantly, the EIR footnotes on page 115 clearly show that the current docent-led program is a huge barrier to public access to public lands.

Most residents can't take time off from work to join a docent-led tour at 10am on a Tuesday. Variant 1 (Docent Program) would result in the same unfair access that exists today, where a few insiders who are named docents or working for the SFPUC have unlimited, unsupervised access to the Fifield-Cahill trail themselves, while the general public is locked out. This is a tremendous injustice that allows a privileged few or insiders to use the land while excluding most ratepayers.” (Mike Johnson, Email, August 9, 2020)

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“The proposed variant provides the flexibility needed for resource protection through the permit process, while allowing much greater access for a broader range of people than those who can schedule a visit with the current program.” (Theral Mackey, Letter via Email, August 6, 2020)

“Limiting access to docent led tours (under variant 1) will preclude access by our most underrepresented groups, including people of color and those without the financial means to be able to plan their work schedules around appointments for docent led tours. People need to have the flexibility to access these trails when their work and family demands permit, not when tours are made available.” (Michael Naranjo, Email, August 6, 2020)

“Importantly, the EIR footnotes on page 115 clearly show that the current docent-led program is a huge barrier to public access to public lands...by killing 94% of the potential visits (only 866 visits on average, versus potential visits of 12,480).

As it turns out, most people can not take the time to do a docent-led tour at 10am on a Tuesday because they are working. Variant 1 (Docent Program) would result in the same unfair access that exists today, where a few insiders who are named docents or working for the SFPUC have unlimited, unsupervised access to the Fifield-Cahill trail themselves, while the general public is locked out. This is a tremendous social justice issue.” (Tsuyoshi Ozaki, Email, August 10, 2020)

“A restricted trail is worse than having no trail. Much fewer people would be able to enjoy access to this trail due to scheduling conflicts, health and safety concerns (especially in the next pandemic), and permit-challenges created by bureaucracy.” (Hansen Qian, Email, August 10, 2020)

“We would prefer the trail to be open to all without permits, since the permit system has proven so restrictive as to be unkind and discriminatory. The SFWD has a proven history to exclude no matter what.” (Christina Romano and Bruce Puckett, Email, August 8, 2020)

“There is a clear association between access to open space, residential land values, and health statistics. And Docent programs largely cut out families. Specifically working families and families with children.” (Will Scovill, Email, July 24, 2020)

“More critically, it continues the unfair and biased access practices that exist today -- where a few insiders who are named docents or work for the SFPUC have unlimited, unsupervised access to the Fifield-Cahill trail, while the rest of the public is locked out by virtue of the fact that they cannot take the time to do a docent-led tour during business hours on a workday. This is a tremendous social justice issue made more pressing in the time of COVID-19, when members of the public are looking for more, not fewer, outdoor areas to enjoy.” (Diana Smetters, Email, August 10, 2020)

“The Southern Skyline Boulevard Ridge Trail Extension Project is a key addition to the Bay Area Ridge Trail towards and into the Crystal Springs watershed, which is a vital wildlife habitat, watershed, and public recreation resource. Less-restricted access should be the priority. It goes without saying that adequate

protections to maintain water quality, habitat, soil stability, and fire suppression should be in place, including significant efforts to educate diverse trail users in multiple languages.

Free and public access to the outdoors was important to my mother and father, my family, my community, and my friends.” (Jon Spangler, Email, August 9, 2020)

“For all the years I've lived in San Francisco and enjoyed the open spaces and public lands in Montara, Half Moon Bay, Belmont, El Corte Madera, and more, I've always been disgusted by the hypocrisy of being told the watershed is "too sensitive" for responsible public access while I see the golf course users, and power and communications maintenance vehicles, and obviously "connected" families picnicking and enjoying what the tax and rate paying public is denied. Inconvenient and discriminatory docent access is a fig leaf, and denies people who can't afford to access the land on an administratively convenient schedule. Low quota permit access is also woefully insufficient if it requires people to sit on waiting lists or get lucky enough to be one of the "chosen few" who have the "privilege" of access bestowed upon them by bureaucrats who have demonstrated for decades that they're only willing to do the bare minimum for to allow access.” (Jason Strnad, Email, July 8, 2020)

“This area should not be a private playground for PUC employees.” (Chris Wood, Email, July 5, 2020)

REPRESENTATIVE COMMENTS

This response also addresses the following comments, which are similar or identical to the representative comment quoted below:

GC-3 REPRESENTATIVE COMMENT 1

I-Adams.2, I-Paton.2, I-Stringer-Calvert.2, I-Thomas.2

“This EIR should also investigate the social justice, equity issues associated with access. For example, San Francisco's Excelsior neighborhood is as close to the proscribed Watershed property as it is to The Presidio. There is a clear association between access to open space, residential land values, and health statistics. And Docent programs largely cut out families. Specifically working families and families with children.” (Jan Adams, Email, August 6, 2020; Laura Paton, Email, August 3, 2020; David Stringer-Calvert, Email, August 2, 2020; Winston Thomas, Email, August 4, 2020)

RESPONSE GC-3

The comments in this group do not concern the project's potential physical environmental effects or otherwise address the adequacy or accuracy of the EIR. Nevertheless, for the benefit of the public and decision-makers, this response summarizes pertinent SFPUC policies, plans, and guidance related to equitable access—including its 2020 Strategic Master Plan, Environmental Justice Policy, Community Benefits Policy, Equity Policy, and Interpretive Master Plan—which would guide public access programing if the project were to move forward.

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The 2020 Strategic Plan¹ provides a framework for planning, managing, and evaluating SFPUC-wide performance, taking into account the long-term economic, environmental, and social impacts of the SFPUC's business activities. This plan consists of a "Durable Section" that contains goals, objectives, and performance indicators to implement the SFPUC's vision and values. The goals and objectives drive the sustainability plan's "Dynamic Section," which contains specific action items, targets, measures, and budgeting. The SFPUC uses the plan to evaluate its performance semiannually to help the SFPUC measure progress on an annual basis. Goal 5 in the strategic plan, Stakeholder and Community Benefits, aims to foster trust and engagement with customers, employees, and the communities SFPUC serves through open and timely communication and education.

The Environmental Justice Policy,² adopted October 13, 2009, defines environmental justice as the fair treatment of people of all races, cultures, and incomes and commits the SFPUC to the goals of ensuring that no group of people bear a disproportionate share of negative environmental consequences. It also commits staff to developing training programs, expanding workforce development strategies, implementing initiatives to avoid disproportionate impacts and increase communication strategies for public participation in decisions, and developing environmental justice best practices.

The Community Benefits Policy,³ adopted January 11, 2011, commits the SFPUC to the goal of developing an inclusive and comprehensive community benefits program to better serve communities in all SFPUC service areas and to ensure that public benefits are shared across all communities. In relation to equity specifically, the policy commits the SFPUC to creating diversity and inclusion programs and initiatives. In application of this policy, the SFPUC commits to developing processes to effectively engage stakeholders and communities in all SFPUC service areas and to developing diverse and culturally competent communication strategies to ensure that stakeholders can participate in decisions and actions that may impact their communities.

The Equity Policy,⁴ adopted July 14, 2020, was put in place to ensure that the SFPUC remains committed to the fair treatment of people of all races, cultures, and incomes and that the agency advances racial justice by centering programs and resource allocations on racial and social equity. Specifically, this policy resolves to structural change within the agency to ensure that underrepresented and minority communities have access to equal benefits from the land and environment and to assess, strengthen, and fund outreach and engagement strategies to ensure communities of color have true access to representation and participation in the agency's processes. The policy further requires that a detailed plan, along with relevant resources and timelines, be reported quarterly detailing how the policy will be implemented.

The Interpretive Master Plan for the Peninsula Watershed trails, completed in October 2019, draws upon the results of background research, site observations, visitor surveys, stakeholder interviews, and planning sessions, among other resources, to establish a vision interpretive and educational programming in association with the proposed Fifield-Cahill ridge trail and southern skyline ridge trail improvements.⁵ Based upon surveys of visitors to neighboring trails (i.e., not visitors to the Peninsula Watershed under the existing docent program) and a review of regional demographic data, the report's authors state that current visitors to nearby trails do not reflect the diversity of some communities in the surrounding region. They go on to explain

¹ SFPUC, *2020 Strategic Plan*, August 2016, <https://sfwater.org/Modules/ShowDocument.aspx?documentid=10846>, accessed March 11, 2021.

² SFPUC, 2009, Commission Resolution No. 09-0170, *SFPUC Environmental Justice Policy*, October 13, 2009.

³ SFPUC, 2011, Commission Resolution No. 11-0008, *SFPUC Community Benefits Policy*, January 11, 2011.

⁴ SFPUC, 2020, Commission Resolution No. 20-0149, *SFPUC Equity Policy*, July 14, 2020.

⁵ SFPUC, 2019, *Peninsula Watershed Trails Interpretive Master Plan*, October 2019.

that outreach is needed, including “specific efforts to identify underserved, often diverse populations and remove the barriers that limit their participation.”

The master plan includes recommendations across arrange of topic areas, including amenities, trail maps, and programs, among others. With respect to programs, the plan acknowledges the SFPUC’s diversity and inclusion policies and identifies several recommendations aimed at and/or would have the effect of helping advance these policies for potential watershed visitors. Selected recommendations include:

- consider offering diverse programs at different times during weekends
- consider reaching out to audiences with physical or sensory challenges
- extend outreach to other underserved and underrepresented groups, including children and youth within the SFPUC’s service area
- recruit, train, and retain docents and volunteers

Regarding diversity and inclusion, the master plan recommends SFPUC consider the six processes identified by the National Park Service’s Conservation Study Institute as essential to engaging diverse communities. These include:

- develop awareness and knowledge of local cultures
- equip staff with the necessary skills
- create a supportive leadership environment
- work with schools and community groups
- provide benefits to communities and the program provider
- recruit new stewards, including student interns who receive training that can lead to employment

As explained in draft EIR Chapter 2, Project Description (p. 2-30), the project includes interpretive educational information for recreational users, which would be tailored to the selected access program. In addition, the project would provide for SFPUC- and volunteer-hosted school program visits to the improved trail areas. The interpretive and educational programming would be based upon the master plan’s recommendations.

Comment GC-4: Privacy, Property Rights, Property Value

This response addresses the following comments, which are quoted below:

I-German.6, I-Molitor-2.4, I-Oldendorp.4, I-Polley.1, I-Polley.3, I-Roesch.1

“We are disappointed and concerned for our neighbors’ privacy and property rights where the trail has not been re-aligned to avoid their homes (Figure 4.2-2c Photo 12). As has been shown with visitors to Midpeninsula Open Space’s Purisima Creek Redwoods Grabtown Gulch trail head, visitors have made themselves at home on residents’ decks despite fencing and signs.” (Carrie German, Email, July 23, 2020)

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“Lastly, I bought this property knowing that the land between me and Filoli was closed to the public. There are already miles and miles of trails in this area that are open to the public. If the public is given access to the land and continues to park closer and closer to our home, it is going to detract from quality of life and property values. It may sound selfish and silly but it will definitely have to be something added into any disclosure document, which directly affects the sellability of a home that is already not in a good school district and located far from any conveniences. If you ever have a doubt as to what the impact to the neighborhood around a trail can be, take a look at the junction of Higgins Canyon Rd and Purisima Creek Rd around the Higgins Road trailhead down the hill at the bottom of the Purisima Creek trail. It is a major bottleneck and very difficult to navigate safely. The overcrowding and unsafe conditions are the exact opposite of what residents and visitors want.” (Jerry Molitor, Email, June 25, 2020)

“I also don’t see in the reports anything about The residential impact. I may have over looked it but I see impacts to environment. wildlife. Vegetarian. Air quality and water quality. But nothing about impact to residents. Quality of life. And property values. If you survey the residents I believe you will get an overwhelming negative response to the project due to increased traffic. Increased noise. Increased trash. Increased parked cars in which many park on private property. One neighbor said they had 8 cars on their land one weekend. The increased visitation over the past 4 months should be looked at very closely as it is a sign of what will happen. I see many dangerous Driving and parking and pedestrian activities and I’m also picking up trash each Monday after the weekends.” (Jason Oldendorp, Email, June 26, 2020)

“Please include this comment among those regarding the Southern Skyline Ridge Trail Extension Project. I respond as a resident and business owner located along the very much affected Kings Mountain Skyline Boulevard section. This project holds portent of much good for the greater Bay Area, but the design and implementation must be amended to not be a huge burden for local residents along the Kings Mountain portion. There are at least three crucial negative factors that cause harm to neighborhood residents along Skyline Boulevard. Until this EIR more fully mitigates the following, I will actively stand opposed to the trail extension from SR 92 south to Phleger Estate.” (Claudia Polley, Email, August 10, 2020)

- “intruders on private property looking for additional walking and bicycle on Kings Mountain.” (Claudia Polley, Email, August 10, 2020)
-

“My parents bought the property at 13419 Skyline Blvd Woodside in 1974. I am now managing the property living in the main house, while I have renters in our 13417 Skyline in-law unit. I wrote a letter in 2016 that I do not want the Southern skyline ridge trail to proceed. I discovered at that time that someone had put florescent flags 15feet behind my property line. My family has paid property taxes for years. The intrusion of people walking in my back yard would be devastating. My parents moved here for the peace and quiet. There are currently 6 houses on the west side of Skyline that would be affected by the trail. It would create more litter, fire hazard and be difficult for maintaining privacy for potential renters. In no-where on the trails do I see intermingling with private homes. Here it is blatant. I do not want to see people traipsing through my back yard. My recommendation is to not build the ridge extension.” (Anna Roesch, Email, August 9, 2020)

RESPONSE GC-4

The topics represented in the comments presented generally concern project effects on property values, privacy, property rights, and residential land uses broadly. The commenters identify as the primary drivers of these effects project-related litter, traffic, noise, and fire hazards. CEQA is concerned with the potential physical effects of a project on the environment. Section 15131 of the CEQA implementing regulations states, “economic or social effects of a project shall not be treated as significant effects on the environment.” Section 15131 states further, “An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to *physical changes caused in turn by the economic or social changes*” (emphasis added). As a result, potential project effects related to property values, privacy, and property rights are beyond the scope of the EIR. However, the environmental topics referenced in these comments are addressed as follows: litter is addressed in EIR Chapter 2 and Section 4.8, traffic in Section 4.4, noise in Section 4.5, and fire hazards in Section 4.11. Responses to comments concerning litter are addressed in Section 11.2, transportation in Section 11.4, noise in Section 11.5, and fire hazards in Section 11.8 of this RTC.

Comment GC-5: Project Funding

This response addresses the following comments, which are quoted below:

O-CNPS.5, I-Abbas.3, I-Brousseau-10.3, I-Drees.2, I-Kromat.3

“6) Funding operations. Costs of maintaining the Watershed and protecting the quality and quantity of water will greatly increase. Who will pay these increased costs—ratepayers? Budget pressures can be expected to occur. We cannot be sure that operations will always be adequately funded.” (Jake Sigg, California Native Plant Society, Email, August 10, 2020)

“In general I appreciate infrastructure improvements to make walking and bicycling safe, but the construction of a bridge as described in the EIR seems like unnecessary expense. I’d think that signage would suffice in this case.” (Alexander Abbas, Email, July 24, 2020)

“Importantly, although I am a resident of San Mateo, and it is important to note that 75% of the water and budget managed by the San Francisco Public Utility Commission is for residents of other cities outside San Francisco.” (Christopher Brousseau, Email, July 12, 2020)

“1. It is my understanding that because there is an existing system of trails and service roads, infrastructure costs would be minimal.” (Natalie Drees, Email, August 6, 2020)

“Which brings me to the matter of finances. Who is paying for this project and wouldn’t the money be better spent on increasing park personnel and dealing with existing problems?” (Heidi Kromat, Email, July 22, 2020)

RESPONSE GC-5

CEQA is concerned with the potential physical adverse effects of a project on the environment. While project costs are relevant factors in determining whether a project alternative is feasible, unless there is a clear connection between a project’s cost and a physical environmental change, it is beyond the scope of CEQA. The comments listed above do not connect the cost of the project to a physical environmental effect. Therefore, these considerations of cost are beyond the scope of the EIR.

Comment GC-6: Non-specific, Lists Multiple Issues

This response addresses the following comments, which are quoted below:

O-GGAudubon.9, I-Brousseau-1.1, I-Brousseau-5.2, I-Brousseau-8.4, I-Chris-1.2, I-Chris-2.1, I-Chris-2.3, I-German.3, I-Johnson_M.4, I-Molitor-1.1, I-Molitor-1.6, I-Molitor-2.2, I-Molitor-3.1, I-Ozaki.4, I-Polley.4, I-Ruby_D.3, I-Ruby_J.4, I-Self.4, I-Smetters.2, I-Turri.1

“7. Population and Demography: The Bay Area’s population is growing rapidly and its projected demographics predict ever increasing demand for outdoor recreation, particularly in “challenging terrain” where steep slopes increase landslide and erosion hazard.

- in 2014, Bay Area population was 7.5 million according to Census estimates. In 2000, close to the date of the 2001 EIR, it was 6.8 million, an increase of nearly 10%. (Artz and Blasky. 2015, Arroyo, 2015)
 - Demographic changes: The Open Space Survey projected: “By 2020, it is projected that California’s young adult group (ages 18–40) will be the most populous in the state, and will be more mobile, dependent on technology (EBRPD, 2011)
 - Moreover, as technology advances, new forms of recreational pursuits will appear and existing activities, such as biking and geocaching (an activity using global positioning systems), will continue in popularity and expand as technology allows for the development of customized equipment to accommodate use in increasingly challenging terrain.” (EBRPD, 2011)
8. Other Changed Circumstances since 2001 Peninsula EIR that make it necessary for a new EIR to be prepared
- New uses of open space e.g. “geocaching”. Geocaching is an outdoor treasure hunting activity for users of hand-held Global Position System (GPS) (EBRPD, 2011)
 - “many new subtypes of mountain biking have evolved and are in practice in Bay Area parks and open spaces including crosscountry (XC) riding, all-day endurance biking, free riding, downhill riding, and a variety of technical obstacle-focused activities.” (EBRPD, 2011, see also Clark, 2014)
 - Americans with Disabilities Act (ADA). From the Open Space Survey: “In accordance with the provisions of the ADA, all newly-designed pedestrian facilities, including trails, should be accessible wherever feasible. This is placing growing pressure on open space land management agencies

to develop narrow natural surface trails to meet new standards;”. The requirements can increase the costs of trails (both initial costs and maintenance to maintain ADA compliance). The requirements may also increase the environmental impacts of the trails (EBRPD, 2011). (Whitney Grover, Golden Gate Audubon Society, Email, August 10, 2020)

“Page 114, and other places similarly state the following: *“Under the proposed access program, the SFPUC would allow supervised access to the Fifield-Cahill ridge trail, similar to the docent program presently in place for this trail segment. This program would allow groups of up to 20 hikers, bicyclists, or equestrians, under the supervision of an SFPUC-approved guide. A maximum of three trail event itineraries could be scheduled per day, four days per week (i.e., Fifield-Cahill ridge trail access would be limited to 60 people per day, 240 per week, 12,480 per year).”*

These numbers are misleadingly high and should be corrected to reflect the likely attendance based on the fact that this current access level is available today - and is rarely used. Unfortunately, these numbers make Variant 1 appear to provide greater access than will really be available -- as current access usage on page 115 footnote 32 shows that only 866 people per year on average, over a 14- year period.

This information should be highlighted in the main body of the report, not just a footnote -- AND -- the estimated usage numbers for this Variant should be adjusted down to reflect the likely average number of users given the strong historical record this model has for keeping people out of the project area.

As an example, under the current model - exactly the same method of access as proposed for Variant 1 - approximately 9,360 reservation slots were available, yet only 866 (~10%) of the people used the system.... so if Variant 1 is going to increase the available slots to 12,480 per paragraph 2.7.1.2.... then the EIR should clearly list the likely number of users as approximately 1,248 per year.

If necessary, list both numbers - but it is critical for decision makers and the public to understand the draconian limitations that Variant 1 creates for public access to this public resource.” (Christopher Brousseau, Email, August 9, 2020)

“Finally, this EIR, and this section, makes explicit reference to additional potential impacts due to only Variants 2 and 3 - but does not explain why those variants create additional impacts, while Variant 1 does not. It seems to be that the affected project area for Variants 2 and 3 is larger, assuming a huge amount of off-trail usage, which is not the proposal, the proposal is usage of the road.

I request that the EIR explain in simple summary form why Variant 1 assumes zero impact, while Variants 2 and 3 are assumed to have large impacts - as it appears that a number of assumptions are being made differently between each proposal. This should be done in a simplified summary table.” (Christopher Brousseau, Email, August 9, 2020)

“Finally, the Midpeninsula Open Space Preserves currently successfully manage over 65,000 acres of public land across 26 separate preserves - using the same access conditions as defined under Variant 2 in the EIR.” (Christopher Brousseau, Email, August 4, 2020)

“2. General Feedback. The two biggest concerns of our community are the speeders and the trash.

a. Many of us have called Caltrans and the county, including asking for an adopt a road program on the incredibly beautiful stretch of this scenic road. Ironically, we were told that its too dangerous for public employees to pick up trash in that area, so, "get this" - the local residents risk their lives to pick up massive

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amounts of trash on a continuous basis!!! Because the area is remote and also on the way to the nearby dump site, some people to save money, just decide to dump their trash along this same stretch of Southern Skyline. So, on days when you see little trash there, its because the local residents have been risking their lives to pick up the trash. Not sure there is a solution to this, but with more people comes more trash, so please at least note this in your EIR as its a huge concern for our community.” (Chris, Email, July 18, 2020)

“Thanks for your email. Local Skyline resident email below (posted on Nextdoor listserv) does a good job summing up the trash problem. The EIR mentioned trash pick up along the trail but I didn't see anything about trash pickup on Skyline Boulevard. As an optimist, maybe more people driving on Skyline means that fewer people decide to dump because more eyes to watch them? The Bay Ridge Trail would be a more beautiful and environmentally safe experience if there was a coordinated plan with the county/law enforcement on the trash dumping along Skyline.” (Chris, Email, July 25, 2020)

“I am new(ish) to the Kings Mountain neighborhood. I drive skyline and then 92 every day twice a day for work and back home. There is honestly not a day that the beauty of this ridge doesn't fill me with awe and joy! The reason I'm writing is because I'm noticing that quite often there is trash dumped at the many lookout points along Skyline. It seems like just when one pile is cleared, another [couch/mattress/pile of waste] takes its place. It really upsets me that this ridge— which is such a treasure to some— is also a place where people come to illegally dump their garbage. It really breaks my heart. That, and I worry for the wildlife that may get entangled/hurt/sick from the mess. Can someone tell me what I can do to keep Skyline clean? Has anyone else noticed/been affected by this? My husband and I have discussed donating security cameras to hopefully deter and/or catch and charge offenders. But who to contact? The county? I'd really appreciate your advice and ideas!” (Chris, Email, July 25, 2020)

“Based on the current behavior of the general public during this corona virus pandemic, Access Program Variant 2 is blatantly irresponsible. The Midpeninsula Open Space Preserves have been discovered by the general public and they are being used well beyond capacity, irresponsibly and with a lack of respect for private property. Now discovered, we expect they will return regularly. Any restroom visible from Skyline will be used by the public. Any locked gate at a clear access point will be breached by them. Unlike deer and mountain lions, fencing will not deter them.” (Carrie German, Email, July 23, 2020)

“Finally, the Midpeninsula Open Space Preserves currently successfully manage over 65,000 acres of public land across 26 separate preserves - using the same access conditions as defined under Variant 2 in the EIR.” (Mike Johnson, Email, August 24, 2020)

“1. The 6-foot wide trail width analyzed in the DEIR does not address social distancing and the current pandemic could, unfortunately, become the "new normal" - more study is needed to determine how to address this situation and the additional environmental impact that a wider trail would bring. I thought I had read somewhere that 4 feet was optimal from an environmental impact perspective but have been unable to find that section again. I would suggest that 8 to 12 feet may be required going forward and it would be irresponsible not to investigate this aspect if the proposal were to move forward.” (Jerry Molitor, Email, August 10, 2020)

“If anyone wishes to discuss these concerns or become familiarized with affected residents along the Kings Mountain Skyline Corridor, I would like to be involved.” (Jerry Molitor, Email, August 10, 2020)

“We already have to deal with a lot of trash as well. I am frequently cleaning up the area in front of my house after weekend visitors overflow from the Purisima Creek North parking lot and decide to either clean out their car or defecate by the roadside (diapers are the worst). It is for all of these reasons that I oppose the trail connecting Phleger Estate with 92, especially considering the possible addition of numerous "feasible" entry points along the way (language taken from the draft doc). There isn't enough garbage collection as it stands right now, so I don't see how bringing in more people and vehicles is going to improve that situation one bit.” (Jerry Molitor, Email, June 25, 2020)

“The 4-foot-wide trail width analyzed does not address the current needs for social distancing, and the current pandemic could unfortunately become the new normal. More study is needed to determine how to address the situation and the impact that a wider trail would bring.” (Jerry Molitor, Planning Commission, Hearing Comments, June 23, 2020)

“Finally, the Midpeninsula Open Space Preserves currently successfully manage over 65,000 acres of public land across 26 separate preserves - using the same access conditions as defined under Variant 2 in the EIR” (Tsuyoshi Ozaki, Email, August 10, 2020)

• tremendous increase in discarded trash and waste along Skyline Boulevard from SR 92 south to at least Kings Mountain Road

None of these issues are addressed in the current Draft EIR. It must be amended to do so.” (Claudia Polley, Email, August 10, 2020)

“To me that would mean setting priority for the well being of the animals within the refuge. Having human activity at a minimum 40% of the day would have a negative impact on the health of the animals. People will also wander, I KNOW this from experience. People will also leave litter and human waste not in the best interest of “protecting the water quality”. You can bet there will also be cyclists (I’m a cyclist as well) using the trail around the clock, they do on MidPen properties, I can see the headlamps at night.” (Dennis Ruby, Email, July 23, 2020)

“Additionally, seeing the increased dumping along Skyline only makes it clear the negative impact public access has had in this beautiful area. There are more and more cars pulled over to the side of the road on upper Skyline as their occupants look for a way to get into the open space, public and private, and in the process leave their garbage.” (Jan Adair Ruby, Email, August 10, 2020)

“Given that the trail is immediately adjacent to State Highway 35, any environmental impact of the trail should be considered in comparison to the existing impact of the highway. There is far greater impact on

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pollution, litter, fire risk, and noise from the existing highway than any potential impact from the trail.”
(Matthew Self, Email, August 4, 2020)

“The Midpeninsula Open Space Preserves currently successfully manage over 65,000 acres of public land across 26 separate preserves - using the same access conditions as defined under Variant 2 in the EIR. By removing the docent requirements for visits, Variant 2 has the potential to increase the number of visits to this trail from 866 on average per year to an estimated 12,480 (see the EIR footnotes on page 115).”
(Diana Smetters, Email, August 10, 2020)

“Before Purisma Creek Open Space opened, I also felt opening the watershed to hiking was a great idea and wanted to hike the trail on the east side of Skyline. But I have since seen over crowding of that space, garbage scattered, hikers parking on private property, and dangerously meandering on the highway. The parking lot does not hold the amount of hikers that come to that area. Hikers park along the highway. It is a danger to KM.” (Jean Turri, Email, August 9, 2020)

RESPONSE GC-6

CHANGED CIRCUMSTANCES, NEW EIR NEEDED

With respect to the comment concerning changed circumstances since the 2011 Peninsula Watershed Management Plan EIR and the need for a new EIR (O-GGAudubon.9), the planning department has prepared an EIR for the project. As described in Chapter 2 (page 2-18), the project includes and the EIR analyzes the potential effects of constructing and operating a proposed universal access trail and parking, which would be designed in accordance with the Americans with Disabilities Act. As also described in Chapter 2 (pages 2-10 through 2-20), the project also includes and the EIR addresses the potential effects of expanding visitation along designated watershed trails to pedestrians, cyclists, and equestrians. As the project would provide for multi-modal access, the types of uses identified by the user (e.g., geocaching and mountain biking) would be allowed under the project and are considered in the EIR’s impact analyses. However, to the extent that the uses identified would require venturing off the designated trails, these activities would be prohibited, and the project includes and the draft EIR evaluates the impacts of design and security elements to minimize off-trail use (page 2-18).

VISITOR USE ASSUMPTIONS

The EIR evaluates the potential effects of constructing and operating the trail project proposed by the SFPUC, including with supervised and unsupervised access, on the Peninsula Watershed. The analysis considers the potential project effects relative to baseline conditions, including with consideration for existing watershed uses and nearby developments and land uses (e.g., State Route 35 and other regional recreational lands). For each type of access, supervised and unsupervised the EIR states the amount of visitation that would be allowed or expected and analyzes the potential effects of that visitation. Additional information regarding the assumptions and approach to analysis for each is provided here.

As explained in draft EIR Chapter 2 (page 2-32), under a docent (supervised) program, public access would be capped at 60 people per day, 240 per week, 12,480 per year, per trail segment. While these numbers represent the maximum visitation under a docent-led access program, the EIR acknowledges that the current docent-led

access program operates well below capacity (page 2-32, footnote 32). The EIR's analysis of effects under a docent program considers the fact that visitors would be under the supervision of a person trained in the rules of watershed access and the sensitivity of its resources, and therefore less likely to engage in prohibited activities that would result in substantial environmental effects. The analysis also draws upon the results of annual surveys and watershed managers' experience over more than 15 years of public access to under the existing docent program (please see for example Section 11.6, Biological Resources [Response B-5] for additional discussion of the findings of annual biological surveys and watershed managers under the existing docent program). For these reasons, the EIR does not find visitation numbers to be a key driver of impacts for docent-led access; assuming fewer visitors therefore would not change any impact conclusions.

As discussed in draft EIR Chapter 2 (page 2-33), under an unsupervised access program, the number visitors would not be capped. To estimate potential visitation with unsupervised access, the planning department commissioned a visitor-use study, which found that up to 50,020 people per year could be expected to visit the project.⁶ The EIR's analysis of effects with unsupervised access is informed by the results of a survey of regional recreational lands managers.⁷ The survey results indicate that non-compliance with watershed rules would likely increase with unsupervised access, and could result in significant adverse environmental effects (see draft EIR Section 4.8 (page 4.8-87) and Section 4.11 (page 4.11-28) for representative discussions related to biological resources and wildfire, respectively). However, the survey also found that overall, agencies have curbed significant adverse impacts stemming from improper uses by posting educational signage, installing fencing and physical barriers, performing regular maintenance, and conducting daily patrols and enforcement. As described in Chapter 2 the project includes a number of these measures, and the EIR evaluates the effects of their installation and operation, including both adverse (e.g., direct effects of installation on wildlife) and beneficial (e.g., protection of water quality).

Several comments (I-Brousseau-8.4, I-Johnson_M.4, I-Ozaki.4, I-Smetters.2) reference nearby open space managed by the Midpeninsula Regional Open Space District and the type of access provided within those lands. The planning department recognizes and, where relevant to the potential effects of the project, the EIR addresses the existence of parks and open space areas in the project area. These comments are noted.

LITTER

Several comments address issues of trash. Most of these comments address existing conditions along State Route 35, and do not concern a potential effect of the project or deficiency with the EIR's analysis. As explained in Chapter 2, the project includes the installation of wildlife-proof trash cans within the project area. Specifically, the trash cans would be installed at visitor access and parking areas, and within restrooms, and would be available for visitor use (page 2-16, 2-17 and 2-20). The trash cans would be inspected daily and emptied as needed based on use (page 2-35). The commenters' preference for a coordinated plan to address trash dumping along S.R. 35, beyond the project limits, is noted. However, the project does not propose facilities beyond the watershed property boundary, and therefore does not include trash cans or collection in such areas.

⁶ CHS Consulting Group, Memorandum from Jill Hough (CHS) to Elijah Davidian (Environmental Science Associates), re: Travel Demand and Vehicle Miles Traveled Estimates for Southern Skyline Boulevard Ridge Trail Extension, March 22, 2018.

⁷ ESA+Orion, *Land Manager Survey, Memorandum*, January 9, 2018.

CORONAVIRUS DISEASE 2019 (COVID-19)

Comments (I-German.3, I-Molitor-1.1, I-Molitor-3.1, and I-Naranjo-2.2) address the potential effects of the project related to the coronavirus disease 2019. The EIR analysis is primarily concerned with the potential physical environmental effects of the project relative to the CEQA baseline, which are those conditions that existed at the time the Notice of Preparation (NOP) was published (CEQA Guidelines section 15125(a)). The coronavirus disease 2019 (COVID-19) pandemic did not exist at the time of NOP publication in 2017. Since the outbreak, San Mateo County has issued guidelines and orders regarding the types of activities that the public may engage in and how to do so safely. Presently, the San Mateo County Public Health Department identifies outdoor trail use (e.g., walking, hiking, bicycling) as an activity that can be done safely with appropriate precautions.^{8,9} Accordingly, recreational lands within the project area are presently open to the public. Under the current schedule, the project would not be completed and open for visitor use until 2022, at which time circumstances related to the COVID-19 pandemic may have changed. In any case, trail use would be governed by the applicable local public health directives effective at the time.

⁸ San Mateo County Health, 2020. Order No. C19-11 of the Health Officer of the County of San Mateo – Social Distancing Guidelines and Face Mask Requirements. June 17, 2020. Available online at: https://www.smchealth.org/sites/main/files/file-attachments/ho_order_c19-11_20200617.pdf?1592431253, accessed March 11, 2021.

⁹ County of San Mateo Parks Department, 2020. More Parks, Trails & Drop-in Picnic Sites, and Playgrounds Re-open. February 24, 2021. Available online at: <https://parks.smcgov.org/press-release/more-parks-trails-drop-picnic-sites-and-playgrounds-re-open>, accessed March 11, 2021.

CHAPTER 12

DRAFT EIR REVISIONS

This chapter presents revisions to the Southern Skyline Boulevard Ridge Trail Extension Project (project) Draft Environmental Impact Report (draft EIR) which was published on June 25, 2020. These revisions include both (1) changes made to text, tables, or figures in response to comments on the Draft EIR, as identified Chapter 11, Comments and Responses; as well as (2) planning department staff-initiated text changes to correct minor inconsistencies, to add minor information or clarification related to the project, and to provide updated information where applicable.

The chapter includes all revisions by reproducing the relevant excerpt of the draft EIR in the sequential order by the chapter, section, and page that it appears in the document. Preceding each revision is a brief explanation for the text change, either identifying the corresponding response codes, such as Response PD-1, where the issue is discussed in Chapter 11 or indicating the reason for a staff-initiated change. Staff-initiated changes to clarify information presented in the draft EIR are highlighted with an asterisk (*) in the margin to distinguish them from text changes made in response to comments. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in underline (double-underline).

None of the revisions result in substantial changes in the analysis or conclusions presented in the Draft EIR. These revisions do not constitute “new information of substantial importance” within the meaning of CEQA Guidelines section 15162(a)(3); therefore, recirculation of the draft EIR is not required.

12.1 Revisions to the Table of Contents and Summary Chapter

* To reflect the addition of an addendum to the scoping summary memorandum in Appendix A, Notice of Preparation and Scoping Summary, page ii of the EIR Table of Contents is revised as follows:

Appendices

A.	Notice of Preparation and Scoping Summary <u>Memorandum and Addendum</u>	A-1
B.	Air Quality and Greenhouse Gas Emissions Estimates.....	B-1
C.	Biological Resources.....	C-1
D.	SFPUC Specifications for Preventing the Introduction and Spread of <i>Phytophthora</i> Species, Including Sudden Oak Death.....	D-1
E.	Expanded Hazards Mitigation M-HZ-8: Fire Management Plan	E-1

* In Table S-1, Mitigation Measure M-BI-1c on draft EIR pp. S-20 though S-22 is revised as follows:

Table S-1 Summary of Impacts of the Proposed Project and Mitigation Measures Identified in this EIR [Excerpt]

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
<p>Impact BI-1: Construction of the project could result in substantial adverse impacts on special-status plants.</p>	Significant	Significant	<p>Mitigation Measure M-BI-1c – Revegetation Plan. A qualified ecologist shall prepare and implement a revegetation plan with detailed specifications for restoring all temporarily disturbed areas. The plan shall include or provide for the following:</p> <ul style="list-style-type: none"> • Preconstruction surveys of representative areas to characterize vegetation composition, including species present, vegetation characterization (tree diameter, etc.), percent cover contributed by each plant species, and total cover by natives, non-natives, and target invasive plant species. Photo points shall also be used to document pre-project conditions. The surveys shall be performed by a qualified ecologist with experience in vegetation restoration. • Use of locally native, ecologically appropriate species for revegetation. Only native species known to occur on the Peninsula Watershed in the affected habitat types shall be used in the planting and seeding palettes. Local native seeds should be sourced from the watershed where possible. Upon approval of the SFPUC or approved representative, some seed may be sourced from suppliers who specialize in locally sourced seed from the greater Bay Area region. • Sanitation measures (e.g., locally sourced cuttings, the elimination of container stock, or the exclusive use of container plants that were grown according to plant pathogen best management practices) to prevent the introduction and/or spread of sudden oak death, other plant pathogens, and invasive plants during revegetation. • Performance criteria and measures to control/remove target invasive plants. Control species shall include those ranked by Cal-IPC as high or moderately invasive, except those that are already widespread in the watershed (e.g., non-native bromes, rough cat’s ear [<i>Hypochaeris radicata</i>], Italian ryegrass [<i>Festuca perennis</i>], wild oats [<i>Avena fatua</i>], etc.). The revegetation plan shall distinguish between well-established invasives not targeted for management and invasives targeted for management. Target invasive plants include but are not be limited to the following: yellow star-thistle, purple star-thistle, 	Less than Significant	Less than Significant

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
			<p>Italian thistle, shortpod mustard, poison hemlock, and large periwinkle. Because the proposed trail may serve as a conduit for spread of weeds, controlling newly introduced invasive weeds promptly and effectively at disturbed construction sites is critical. The performance standard for target invasive weeds shall be no more than 10 percent absolute cover during the five-year performance period.</p> <ul style="list-style-type: none"> The minimum performance criteria shall include: <ul style="list-style-type: none"> Combined native and naturalized⁴ plant cover (50 percent cover; or equal to or greater than baseline within five years) (applies to non-maintained areas only) Maximum cover by target invasive plant species (no more than 10 percent absolute cover during each year of the monitoring period) If special-status plants are identified within the active work area and cannot be avoided, the revegetation plan shall include salvage and transplantation measures to seed or relocate affected plants to an appropriate nearby revegetation site. The qualified ecologist shall identify those plants for which translocation would likely be successful and feasible, and for each of those species the plan shall include a description of microhabitat conditions necessary for the species, salvage and transplantation procedures, seed collection and germination methods, an assessment of potential transplant and enhancement sites, performance criteria (e.g., less than 10 percent coverage by target invasive plants and comparable plant abundance, as deemed appropriate for the affected species), and a long-term monitoring program. <u>If any state-listed or state rare plant species cannot be avoided, SFPUC shall obtain an Incidental Take Permit from CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq. prior to any salvage operations, or if salvage and transplantation is not feasible.</u> Special-status plant mitigation areas shall be established at a ratio of 1:1 (impacted area to plantings) based on either the impacted area or the number of impacted individuals, as deemed appropriate by the qualified ecologist. Plants that can be feasibly relocated shall be transplanted into the revegetation site, typically adjacent suitable habitat that is unoccupied, to avoid making transplants into undisturbed occupied habitat and potentially spreading diseases. # 		

12. Draft EIR Revisions

12.1 Revisions to the Table of Contents and Summary Chapter

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
			salvage and transplantation is not feasible, consistent with the requirements of the Native Plant Protection Act, the SFPUC shall notify the California Department of Fish and Wildlife at least 10 days prior to disturbance to allow for the salvage of rare or endangered native plants that would otherwise be destroyed.		

⁴ Note that naturalized species may include Cal-IPC moderate species such as non-native bromes, Italian ryegrass, wild oats, and other species found in the Peninsula Watershed.

* In Table S-1, Mitigation Measure M-BI-2a on draft EIR pp. S-23 though S-25 is revised as follows:

Table S-1 Summary of Impacts of the Proposed Project and Mitigation Measures Identified in this EIR [Excerpt]

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
<p>Impact BI-2: Construction of the project could result in substantial adverse impacts on special-status wildlife.</p>	Significant	Significant	<p>Mitigation Measure M-BI-2a – Avoidance and Minimization Measures for Special-Status Reptiles and Amphibians.</p> <p>The following measures shall be implemented before and during construction:</p> <ul style="list-style-type: none"> • Construction contractor(s) shall limit the construction disturbance area to that necessary for project construction and avoid outside areas by posting signage delineating the construction disturbance area with flags, stakes, or fencing. • The SFPUC shall identify a qualified biologist (who has familiarity and field experience with the affected species, as described in M-BI-1d) to act as construction monitor before construction work begins. • No more than two weeks prior to the onset of work activities and immediately prior to commencing work, the qualified biologist shall conduct a thorough survey of the entire construction footprint for San Francisco garter snake, California red-legged frog, and other special-status species with the potential to be present. • The SFPUC shall ensure that, during work activities, all trash is properly contained in closed containers, removed from the work site and disposed of daily to avoid attracting predators to the site. • The contractor and all site personnel in motorized vehicles shall maintain a speed limit of 15 miles per hour within the project area at all times. • The construction contractor shall install a wildlife exclusion fence in or adjacent to wetland areas where earthmoving equipment will be used. The qualified biologist shall determine specific locations for the exclusion fencing and shall be present during, and oversee vegetation removal for, construction of the exclusion fence. <u>Within San Francisco garter snake habitat areas where vegetation clearing would occur, initial vegetation thinning shall occur using hand tools. If mechanized hand tools such as string trimmers are used within San Francisco garter snake habitat, they will be used in the presence of a biological</u> 	Less than Significant	Less than Significant

12. Draft EIR Revisions

12.1 Revisions to the Table of Contents and Summary Chapter

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
			<p><u>monitor (see last bullet) who ensures the absence of SFGS immediately ahead of vegetation clearing.</u></p> <ul style="list-style-type: none"> <u>In San Francisco garter snake habitat, the contractor shall install an exclusion fence containing exit funnels to allow any San Francisco garter snakes within the construction area to leave without human intervention, while preventing entry of San Francisco garter snake and California red-legged frog into the construction zone. A qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, as deemed necessary by the biologist. Exit funnels shall be placed no more than 200 feet apart along the fence, or as modified by the biological monitor. The exit funnels shall be installed at ground level. The contractor may use a qualified biologist as a full-time biological monitor in place of exclusion fencing. The monitor will survey the trail for the presence of San Francisco garter snake and California red-legged frog. If an individual is observed, the monitor shall follow the procedures set forth in this measure (below) for responding in the event special status species are present within the exclusion fence area.</u> At the beginning of each workday that includes initial ground disturbance, including grading, excavation, and vegetation-removal activities, the approved biologist shall conduct onsite monitoring for the presence of these species in the area where ground disturbance or vegetation removal will occur. The biologist shall inspect the perimeter fences to ensure they do not have any tears or holes, that the bottoms of the fences are still buried, and that no individuals have been trapped in the fences. Construction work crews shall cover all excavated or deep-walled holes or trenches greater than 2 feet at the end of each workday using plywood, steel plates, or similar materials or shall construct escape ramps of earth fill or wooden planks to allow animals to exit. Before such holes are filled, workers shall thoroughly inspect them for trapped animals. If a special-status species is present within the exclusion fence area during construction, work shall cease in the vicinity of the animal, and the animal shall be allowed to relocate of its own volition unless otherwise approved by the regulatory agencies with jurisdiction over the species. 		

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
			<ul style="list-style-type: none"> • The contractor shall maintain the temporary fencing—both exclusion fencing and protective fencing (if installed)—until all construction activities are completed. No construction activities, parking, or staging shall occur beyond the fenced exclusion areas. After construction is completed, the contractor shall remove exclusion fencing, cover boards, and all associated debris and either store or dispose of it off site. • Project personnel shall be required to immediately report any harm, injury, or mortality of a special-status species during construction (including entrapment) to the biological monitor, who shall immediately notify the SFPUC. As appropriate, the SFPUC shall provide verbal notification to the U.S. Fish and Wildlife Service’s Endangered Species Office in Sacramento, California and/or to the California Department of Fish and Wildlife warden or biologist (as applicable) and written notification, as requested, by the agencies. • <u>Full-time biological monitoring shall be provided during vegetation clearing and initial ground disturbance within San Francisco garter snake habitat.</u> Once all <u>clearing and</u> initial ground-disturbing activities are completed, the biological monitor shall perform spot checks of the project area at least once a week, and daily between November and April during rain events, for the duration of construction to ensure that the perimeter fence is in good order, trenches are being covered if left open overnight (or escape ramps provided), project personnel are conducting checks beneath parked vehicles prior to their movement, and all other required biological protection measures are being followed. 		

* In Table S-1, Mitigation Measure M-BI-2c on draft EIR pp. S-25 and S-26 is revised as follows:

Table S-1 Summary of Impacts of the Proposed Project and Mitigation Measures Identified in this EIR [Excerpt]

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
<p>Impact BI-2: Construction of the project could result in substantial adverse impacts on special-status wildlife.</p>	Significant	Significant	<p>Mitigation Measure M-BI-2c – Avoidance and Minimization Measures for Dusky-footed Woodrat and American Badger.</p> <p>The following measures shall be implemented to avoid and minimize impacts on dusky-footed woodrat and American badger, if present:</p> <ul style="list-style-type: none"> • A qualified biologist with experience identifying woodrat nests and badger dens shall conduct a preconstruction survey for San Francisco dusky-footed woodrat nests and American badger dens in suitable habitat along: the universal access loop trail, staging area, parking lots; the southern skyline ridge trail work area, parking lot, and staging areas; and all fencing work areas along the southern skyline ridge trail and Fifield-Cahill ridge trail, including along the Skyline Quarry access road. The qualified biologist shall flag active nests/dens identified within the project work areas as a sensitive resource to be avoided during construction. • Should avoidance of active woodrat stick nests within the project site not be feasible, the nests <u>material</u> shall be dismantled by hand <u>and relocated to a nearby area under</u> the supervision of the qualified biologist, consistent in coordination with California Department of Fish and Wildlife guidance and permits, as applicable. If young are encountered during dismantling/<u>relocation</u> of the nest <u>material</u>, the material shall be replaced <u>placed back</u> and a 20-foot no-disturbance buffer shall be established around the active nest. The biologist shall inspect the nest at least 24 <u>48</u> hours later to see if the young are present. If the young are still present, the buffer shall remain in place until the woodrats have matured enough to disperse on their own accord and the nest is no longer active. 	Less than Significant	Less than Significant

* In Table S-1, Mitigation Measure M-BI-4 on draft EIR pp. S-32 and S-33 is revised as follows:

Table S-1 Summary of Impacts of the Proposed Project and Mitigation Measures Identified in this EIR [Excerpt]

Environmental Impacts	Level of Significance Without Mitigation		Mitigation/Improvement Measures	Level of Significance With Mitigation	
	Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail		Fifield-Cahill Ridge Trail	Southern Skyline Ridge Trail
BIOLOGICAL RESOURCES [EXCERPT]					
Impact BI-7: Project construction and operations would result in substantial adverse impacts related to the spread of invasive plant species and pathogens.	Significant	Significant	<p>Mitigation Measure M-BI-4 – Operational Measures to Protect Sensitive Plant Species.</p> <ul style="list-style-type: none"> The SFPUC shall annually survey and monitor special-status plants within 20 feet of the Fifield-Cahill ridge trail, loop trail, and southern skyline ridge trail centerline to detect changes in population size, location, and vigor. If population decline is recorded during annual monitoring and the surveyors determine trail usage or unauthorized off-trail appears to be a contributing factor, the SFPUC shall protect the population and reduce the impact of trail usage by implementing measures such as additional fencing, signage, increased enforcement, rerouting the road or trail, translocation or reseeding, returning to doцент-led access, or seasonal trail closure. The SFPUC shall monitor and enforce protection of special-status plant populations for 10 years or until monitoring demonstrates that trail use has no substantial effect on year-over-year plant vigor or plant population numbers, whichever is longer. The SFPUC shall provide informational signage to educate the public concerning potential recreational impacts on native vegetation, including sudden oak death and other <i>Phytophthora</i> spp. The SFPUC shall regularly inspect trail fencing (e.g., weekly or monthly) and promptly repair damage (e.g., quarterly) in order to maintain fencing integrity and prevent off-trail use. <p>All motorized vehicles shall maintain a speed limit of 15 miles per hour within the project area (10 miles per hour at Five Points) at all times to avoid harm to sensitive species.</p> <ul style="list-style-type: none"> The SFPUC shall provide closed (wildlife-proof) garbage containers at trailhead parking areas for the disposal of trash items (e.g., wrappers, cans, bottles, food scraps) and empty them daily. The SFPUC shall scan the project area <u>and remove</u> for litter and <u>food waste</u> during daily sweeps. 	Less than Significant	Significant and Unavoidable

12.2 Revisions to Chapter 2, Project Description

* The fencing description in Chapter 2, Project Description (p. 2-18), for the southern skyline ridge trail is revised as follows:

Security Features

To facilitate public access through the watershed while minimizing risks to public health and safety, the SFPUC would repair or install perimeter barbed-wire fencing along most of the southern skyline ridge trail alignment, with lockable gates at designated access points. The SFPUC has developed two categories of barbed-wire fencing, the specifications of which differ depending upon location and purpose. Each of the two categories – exterior boundary fencing and interior fencing – includes two designs (total of four designs), the details of which are presented below.

Exterior boundary fencing is proposed along property lines and roads where the SFPUC has identified security as a greater concern. The exterior boundary fencing would have two possible designs depending on location which would be either 48 or 60 inches tall; both types would have a smooth bottom wire at 12 inches above ground level and a barbed top wire. The spacing between wires would be 9 inches for both designs, except that the top two wires of the 60-inch design would be 12 inches apart.

Interior fencing is proposed between the trail and the watershed's interior, where access needs to be controlled, but security concerns are lower due to distance from the road and parking areas (which are more publicly accessible with higher traffic. The interior fencing would have two designs depending on location, either be between 42 or and 54 inches tall; both types would have a smooth bottom wire at 18 inches above ground surface, and a smooth top wire. The spacing between wires would be 6 inches for both designs, except that the top two wires of the 54-inch design would be 12 inches apart.

The SFPUC has designed the fencing with consideration for wildlife passage and required watershed security and resource protection, drawing upon relevant literature, local experience, and organizational knowledge.^{15a} The shorter of the two designs in each category would be used in areas known to or suspected to be wildlife movement corridors. All fencing would have reflectors to increase visibility, prevent bird strike, and discourage wildlife from attempting passage through the middle of fence. Under all designs, the barbed-wire fencing would be strung between metal posts spaced approximately 10 feet apart.

This fencing would mainly be 5-foot tall, barbed-wire fence extend along approximately 5.5 miles of the southern skyline ridge trail's eastern frontage (interior) and 3.6 miles of the trail's western frontage (exterior). The barbed-wire fencing would be strung between metal posts spaced approximately 10 feet apart. The SFPUC is considering a range of barbed-wire fencing types, with heights ranging from 42 to 60 inches, strands ranging from five to seven, and with un-barbed bottom wires ranging from 12 to 18 inches above the ground surface. The SFPUC is not proposing new fencing where barbed-wire fencing already exists in the remaining portions of the western frontage. The project design calls for barbed-wire fencing setbacks of approximately 5 to 850 feet from the trail centerline, based upon topography, vegetation, property boundaries, and avoidance of sensitive resources.

In addition to the barbed-wire fencing, the SFPUC would install approximately 1,380 linear feet of 2.5-foot-tall barrier rail along the outer slope edge of trail segments with retaining walls. In addition, the SFPUC would construct a 4-foot-tall, 610-foot-long split-rail fence along the perimeter of the southern skyline ridge trail parking lot.

^{15a} Fournet, John, 2020, Email from John Fournet (SFPUC) to Scott MacPherson (SFPUC), Subject: Re: Ridge Trail EIR – Responses to Comments- wildlife friendly fencing, October 28, 2020.

- * The fencing description in Chapter 2, Project Description (p. 2-20), for the Fifield-Cahill ridge trail is revised as follows:

Security Features

The SFPUC would install road gates and *bollards*¹⁶ on Cahill Ridge Road (a service road) south of Cemetery Gate to limit vehicles to the access road and parking area only. In addition, under the unsupervised access management variants (variants 2 and 3, discussed further in Section 2.7.1, Trail Access Management Program and Visitation), the SFPUC would install barbed-wire fencing along the Fifield-Cahill ridge trail. This fencing would include approximately 8 miles of new fencing along both sides of the trail (16.3 miles in total) between Portola Gate and Cemetery Gate. The barbed-wire fencing components and dimensions would be as generally consistent with that described above for the southern skyline ridge trail's 54-inch interior fencing. The new fencing would be set back from the trail centerline by up to 50 feet, as topography and vegetation allow.

- * Section 2.5.1.2, *Fifield-Cahill Ridge Trail Improvements*, on draft EIR page 2-20, is revised to include a new subheading after the subheading *Security Features*, as follows:

Educational/Interpretive Signage

In addition to the trailhead signage identified for the universal access loop trail, above, the SFPUC would install 13 additional educational/interpretive signs along the Fifield-Cahill ridge trail. Consistent with the Peninsula Watershed Interpretive Master Plan, the signs would consist of interpretive panels which “moves beyond facts to tell a story that connects the visitor to the inherent meaning of a site’s resources.”^{16a} The panels would measure approximately 36 inches horizontal by 24 inches vertical, would rise to a height of approximately 48 inches above the ground surface, and would be positioned at a 30 to 45 degree angle for maximum viewing and minimal view blockage. Each sign, which would be located along the existing service road (Fifield-Cahill ridge trail) shoulder, would be mounted on two redwood or metal posts set in concrete. The SFPUC would use a power auger or hand operated post hole digger to excavate the signpost holes, each of which would measure approximately 6 inches diameter and 36 inches deep. Sign installation would involve approximately 2.5 square yards of ground disturbance total. The educational/interpretive signage would be installed under both the proposed access program and the variants.

^{16a} SFPUC, 2019, Peninsula Watershed Trails Interpretive Master Plan, October 2019.

12. Draft EIR Revisions

12.3 Revisions to Section 4.1, Overview

The text of the fourth paragraph on p. 2-28 is revised as follows to reflect the updated construction schedule:

Project construction would begin in the summer of ~~2020~~ 2022 and could continue into the summer of ~~2021~~ 2023. During the approximately 12-month construction period, the SFPUC would concurrently construct project components north and south of S.R. 92, as described in Section 2.6.9, Project Workforce.

12.3 Revisions to Section 4.1, Overview

The text of the third bullet on p. 4.1-5 is revised as follows to reflect the updated construction schedule:

Timing and Duration of Implementation. Construction of the project would span 12 months and is anticipated to commence in summer ~~2020~~ 2022 (refer to Section 2.6.10, Construction Equipment, in Chapter 2, Project Description) and be completed in summer ~~2021~~ 2023.

12.4 Revisions to Section 4.4, Transportation and Circulation

The following text is added to EIR Section 4.4.1.1, Road Network (p. 4.4-2), after the first paragraph in that subsection, to describe existing SFPUC traffic and maintenance activities along watershed roads in the project area:

The volumes reported above capture all types of vehicle traffic, including visitors to the project area, regional travel, and trucks related to watershed maintenance and operations activities, among others. Current traffic on watershed service roads in the project area includes SFPUC and vendor vehicles for watershed lands and facilities operations, and periodically requires use by earth movement and vegetation management vehicles and equipment. For example, the SFPUC mows and maintains (i.e., grades and/or patches) watershed roads, including portions of the Fifield-Cahill ridge trail, every two to five years. In addition, SFPUC staff manages wildfire risk by reducing fuel loads and maintaining fuel breaks of up to 50 feet wide throughout the watershed, including along the proposed southern skyline ridge trail alignment and along Fifield Ridge, north of Five Points. This work involves tree felling and vegetation clearing, as needed, typically on four-year intervals. SFPUC staff drive on the Fifield-Cahill ridge trail between Cemetery Gate and Five Points approximately 3 to 5 times per day, and between Five Points and Portola Gate (at Sweeney Ridge) approximately 1 to 3 times per day. Watershed visitor traffic also includes vehicles for the approximately 10 to 20 visitors (i.e., hikers, bicyclists, and equestrians) who use the trail under the existing docent program, up to three days per week. However, watershed recreational visitors typically do not drive on interior watershed roads (i.e., Fifield and Cahill service roads).

The text on draft EIR page 4.4-11 (second paragraph) is revised as follows:

Construction activities would generally take place within SFPUC right-of-way (i.e., outside of the public right-of-way along S.R. 35 and S.R. 92) and would not substantially conflict with traffic, transit, bicycle, or pedestrian access or circulation along these facilities. ~~Newly constructed service roads connecting to S.R. 35 would be sited to provide adequate sight distance for heavy vehicles to safely enter and exit the construction site.~~ The use of a crane to install the prefabricated pedestrian bridge proposed for seasonal drainage crossing along southern skyline ridge trail would require intermittent

closure of the northbound lane of S.R. 35 for up to three days for site preparation, bridge delivery, crane setup, bridge placement, and site cleanup and materials removal. The access drives would provide construction and maintenance access connections between S.R. 35 and the trail alignment. Their approximate locations, shown in Figures 2-3a through 2-3e, were selected with consideration for safety and trail accessibility (e.g., distance, favorable topography, minimal vegetation). Any activities taking place during the week or weekend within the public right-of-way along S.R. 35 and S.R. 92, including construction and operation of access drives, or requiring temporary traffic controls such as lane closures would be coordinated directly with Caltrans (through preparation of a Caltrans-approved transportation management plan as part of an application for an encroachment permit) to ensure traffic safety and minimize disruptions to traffic, transit, bicycle, or pedestrian access or circulation along these facilities.

* The text of the third full paragraph on page 4.4-14 is revised as follows:

Upon the completion of construction, typical maintenance activities would include periodic (e.g., monthly) inspection of trail infrastructure (e.g., trail and parking lot surfaces, retaining walls, and drainage facilities), with more frequent inspection of restroom and fences (i.e., weekly). Restroom maintenance would include weekly vault toilet pumping by a vacuum service truck. For the proposed access program and variants, this EIR conservatively assumes up to one additional staff person and 10 volunteers could be required to support project operations. As a result, SFPUC maintenance vehicle traffic along the Fifield and Cahill service roads would not be substantially different from that described above for existing conditions (3 to 5 times per day between Cemetery Gate and Five Points, 1 to 3 times per day between Five Points and Portola Gate [at Sweeney Ridge]). Maintenance vehicle traffic along the southern skyline ridge trail would be similar to or less than that described for the Fifield and Cahill service roads, on account of the trail's proximity to S.R. 35 which would provide trail access via the proposed access drives, and because the southern skyline ridge trail would not connect to other interior watershed roads. Considering the infrequent occurrence and the minimal number of staff/volunteers needed to perform maintenance activities, the number of vehicle trips generated by such activities would not represent a noticeable increase in daily traffic volumes. Therefore, maintenance is not considered in the discussion of project operations below.

* The text on the top of page 4.4-23 is revised as follows:

Mitigation Measures M-TR-5a; and M-TR-5b; ~~and M-TR-5c~~ apply to operation of the proposed access program and variants 2 and 3.

12.5 Revisions to Section 4.7, Greenhouse Gas Emissions

The third paragraph on p. 4.7-10 is revised as follows to reflect the updated construction schedule:

This analysis is based on estimates of GHG emissions from project construction derived using the CalEEMod emissions estimator model (version 2016.3.2); as input to the model, the SFPUC provided data on construction equipment fleet and activity for the proposed access program and variants (see Table 2-1 in Chapter 2, Project Description). Project construction activities would occur over approximately 12 months ~~(between summer 2020 and summer 2021)~~. The resulting exhaust emissions

from off-road equipment, on-road trucking, and construction worker commute traffic during this period would contribute minimally to long-term regional GHG emissions.

12.6 Revisions to Section 4.8, Biological Resources

* The text of the third paragraph on page 4.8-16 is revised as follows:

In San Mateo County, Douglas fir forest is limited to fog-influenced areas near the coast. Douglas fir forest is the primary habitat type on Cahill ridge and a small portion of the upper Quarry Road, and is also found along the southern one-third of the proposed southern skyline ridge trail alignment. Special-status plants potentially occurring in this habitat type include Anderson's manzanita (*Arctostaphylos andersonii*), Montara manzanita (*Arctostaphylos montaraensis*), Kings Mountain manzanita (*A. regismontana*), and Dudley's lousewort (*Pedicularis dudleyi*).

* The text of the third paragraph on page 4.8-17 is revised as follows:

In the project area, coast redwood forest is mapped only along the southernmost mile of the proposed southern skyline ridge trail alignment. In the watershed, coast redwood forest typically occurs on sheltered northeast-facing slopes on neutral (non-acidic) soils. It is reported that nearly all redwoods on the watershed were cut some 150 years ago and that today's trees are second-growth.⁴³ The SFPUC has removed hazardous tanoaks adjacent to its southern fuelbreak, while the remaining tanoak in the project area have decomposed on the stump and collapsed after being killed by sudden oak death. The tanoak burls are sprouting but show evidence of continued infestation by this pathogen. Special-status plants potentially occurring in this habitat type include Anderson's manzanita, Montara manzanita, Kings Mountain manzanita, and Dudley's lousewort.

⁴³ San Francisco Public Utilities Commission, *Peninsula Watershed Management Plan*, Spring 2002.

* The text of the third paragraph on page 4.8-18 is revised as follows:

Although no special-status plants known to occur in the region are specifically associated with tanoak forest, special-status plants potentially occurring in this habitat type include Anderson's manzanita, Montara manzanita, and Kings Mountain manzanita. Although sudden oak death has heavily affected this habitat type, where tanoak forest remains its habitat value is considerable because the dominant species produces large seed crops almost every other year. Common wildlife species expected in tanoak forest are much the same as those in Douglas fir and coast redwood forests. Special-status species potentially occurring in this habitat could include sharp-shinned hawk, California giant salamander, and Santa Cruz black salamander.

* The text of the third paragraph on page 4.8-21 is revised as follows:

Many native woody species are hosts of the sudden oak death pathogen. California bay is the primary infectious agent, although *sporangia* (buds or spores) are also released from tanoak twigs and leaves. In addition to bay and tanoak, other hosts in the watershed include Montara manzanita (*Arctostaphylos montaraensis*), Giant chinquapin (*Chrysolepis chrysophylla* var. *minor*), coast live oak, Pacific madrone (*Arbutus menziesii*), and coffeeberry (*Rhamnus californica*). Montara manzanita has

shown symptoms of *P. ramorum* infestation on Montara Mountain in the Peninsula Watershed, and sudden oak death could also affect the closely related Anderson's manzanita (*A. andersonii*) and King's Mountain manzanita (*A. regismontana*).⁵⁵ ~~Both~~ Each of these manzanita species may potentially occur in certain habitat types in the project area (see Table 4.8-2).

⁵⁵ California Oak Mortality Task Force, *Phytophthora ramorum* hosts reported since 2012/2013 and missing from the APHIS *P. ramorum* host or associated host list, July 23, 2018, <http://www.suddenoakdeath.org/wp-content/uploads/2018/10/P-ramorum-hosts-detected-since-2012.pdf>, accessed October 11, 2019.

* The text of the last paragraph on page 4.8-23 is revised as follows:

In a 2013 study, Swiecki and Bernhardt⁶³ reported that seven additional species of *Phytophthora* were present on the Peninsula Watershed: *P. cinnamomi*, *P. cambivora*, *P. cactorum*, *P. cryptogea*, *P. megasperma*, *P. 'chlamydo'* (now recognized as *P. chlamydospora*⁶⁴), and *P. gonapodyides*. The study's authors report detection of *P. cinnamomi* and *P. cambivora* in nine locations each; *P. cactorum* in eight locations; *P. cryptogea*, *P. megasperma*, and *P. chlamydospora* (*chlamydo.*) in two locations each, and *P. gonapodyides* in one location. Most detections were in the south skyline portion of the project area. *P. cryptogea* was detected near Cemetery Gate and there were no detections north of this point.⁶⁵ All of these species are reported to be primarily soil-borne rather than primarily airborne as with *P. ramorum*. Swiecki and Bernhardt concluded that of the seven other (non-sudden oak death) *Phytophthora* species, several pose considerable threats to watershed native plant communities.⁶⁶ *Phytophthora cinnamomi* causes lethal diseases in an unusually large number of plant species, including madrones and many other woody *dicot* species (flowering plants with two seed leaves) and conifers. In Australia, *P. cinnamomi* has invaded and devastated several hundred thousand acres of native forests and has brought a number of Australian rare plant species to the brink of extinction.⁶⁷ In California, *P. cinnamomi* causes severe damage to coast live oaks, madrones, and manzanitas, all of which are present on the watershed (including ~~two~~ three rare manzanitas). *P. cinnamomi* is more widespread on the watershed than other species of *Phytophthora*, but studies have yet to establish why.⁶⁸

⁶³ Swiecki, Tedmund and Elizabeth Bernhardt, *The Distribution and Management of Root-rotting Phytophthora Species on the Peninsula Watershed*, prepared for San Francisco Public Utilities Commission, San Francisco, September 2013, 23 pp.

⁶⁴ Hansen, Everett M., Paul Reeser, Wendy Sutton and Clive M. Brasier, Redesignation of *Phytophthora* taxon *Pgchlamydo* as *Phytophthora chlamydospora* sp. Nov., *North American Fungi*, 10(2):1-14, May, 2015, <http://www.pnwfungi.org/index.php/pnwfungi/article/view/1414>, accessed October 9, 2017.

⁶⁵ Swiecki, Tedmund and Elizabeth Bernhardt, *The Distribution and Management of Root-rotting Phytophthora Species on the Peninsula Watershed*, (Figure 1 and Table 1), September 2013, 23 pp.

⁶⁶ Swiecki, Tedmund and Elizabeth Bernhardt, *The Distribution and Management of Root-rotting Phytophthora Species on the Peninsula Watershed*, September 2013, 23 pp.

⁶⁷ Shearer, B.L., C.E. Crane, S. Barrett and A. Cochrane, *Phytophthora cinnamomi* invasion, a major threatening process to conservation of flora diversity in the South-West Botanical Province of Western Australia. *Australian Journal of Botany* 55:225-238, 2007, in Swiecki, Tedmund and Elizabeth Bernhardt, *The Distribution and Management of Root-rotting Phytophthora Species on the Peninsula Watershed*, prepared for San Francisco Public Utilities Commission, San Francisco, September 2013, 23 pp.

⁶⁸ Swiecki, Tedmund and Elizabeth Bernhardt, *The Distribution and Management of Root-rotting Phytophthora Species on the Peninsula Watershed*, September 2013, 23 pp.

* Table 4.8-2 on page 4.8-27 is revised to include a new row below the second row (Bent-flowered fiddleneck), as follows:

Table 4.8-2 Special-Status Plant Species Present, or with Potential to Occur, in the Project Area [Excerpt]

Common Name <i>Scientific Name</i>	Listing Status	Life Form	Flowering Period	Habitat Conditions	Potential to Occur
Bent-flowered fiddleneck <i>Amsinckia lunaris</i>	CNPS 1B.2	Annual herb	Mar – Jun	Cismontane woodland, coastal bluff scrub, and valley and foothill grassland. Elevation 10 to 1,640 feet.	Moderate: Records approximately 0.6 mile away; suitable woodland-grassland habitat present on Fifield and Cahill ridges.
<u>Anderson's manzanita</u> <i>Arctostaphylos andersonii</i>	CNPS <u>1B.2</u>	<u>Shrub (evergreen)</u>	<u>Nov-May</u>	<u>Openings in broadleafed upland forest, chaparral, and North Coast coniferous forest. Elevation range: 200 to 2,500 ft.</u>	Moderate: <u>Habitat present on southern skyline ridge trail alignment. Recorded from Butano Ridge in redwood/Douglas-fir habitat.</u>

* Table 4.8-3 on page 4.8-31 as follows:

Table 4.8-3 Special-Status Wildlife Species Present, or with Potential to Occur, in the Project Area [Excerpt]

Common Name <i>Scientific Name</i>	Status	Habitat	Potential to Occur
MAMMALS			
American badger <i>Taxidea taxus</i>	CSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Moderate: One known <u>Known to</u> occur near the southern portion of the project area. Suitable open habitat is found elsewhere throughout the project area.
<u>Mountain lion</u> <i>Puma concolor</i>	<u>CE (candidate)</u>	<u>Found in mountains, hills, chaparral, forest and woodland habitats. Solitary, elusive, and highly territorial; primarily prey on deer, also other mammals. Dens among rocky outcrops, dense thickets and under uprooted trees</u>	High Potential (movement only): <u>Numerous sightings reported on the San Francisco Peninsula and near the Crystal Springs Reservoirs; watershed lands contain suitable habitat and abundant prey.</u>

* The text of the last paragraph on page 4.8-55 is revised as follows:

The clearing and/or crushing of vegetation for fencing construction in coast redwood, Douglas fir, and tanoak forest and oak woodland habitat could directly affect populations of Anderson's manzanita, Montara manzanita, Kings Mountain manzanita, bent-flowered fiddleneck, Franciscan onion, and San Francisco collinsia. Construction in grassland, coyote brush scrub, and coffeeberry scrub could affect Franciscan onion, bent-flowered fiddleneck, San Francisco collinsia, western leatherwood,

Point Reyes horkelia, arcuate bush mallow, woodland woollythreads, and coastal triquetrella. Low-lying moist or clay soils in construction areas could support Choris' popcornflower, Franciscan onion, or bent-flowered fiddleneck. Non-native-dominated Monterey cypress or Monterey pine stands may also support western leatherwood. As discussed above, none of these plants were observed within the trail alignment and construction area, suggesting a similarly low potential for them to occur in the adjacent fence alignment area.

- * Section 4.8.4.4, Impact Analysis, is revised to include a new subsection within Impact BI-2, on page 4.8-73, following subsection *Dusky-Footed Woodrat and American Badger, Fifield-Cahill Ridge Trail*, as follows:

Mountain Lion, Fifield-Cahill Ridge Trail and Southern Skyline Ridge Trail

Proposed Access Program and Variants

Mountain lions are found in the Peninsula Watershed, where they inhabit undisturbed areas and prey on deer and other large mammals. Because they den, raise young, and feed in remote areas, they would not be present in the project area during construction, and their habitat would not be impacted by the project. Thus, there would be no impact on this species during construction.

- * Section 4.8.4.4, Impact Analysis, is revised to include a new subsection within Impact BI-5, on page 4.8-105, following subsection *Dusky-Footed Woodrat and American Badger, Fifield-Cahill Ridge Trail*, as follows:

Mountain Lion, Fifield-Cahill Ridge Trail and Southern Skyline Ridge Trail

Proposed Access Program and Variants

Mountain lions are found in the Peninsula Watershed, but are elusive, preferring undisturbed areas for denning, feeding and raising young. While they have high potential to occur in the project area, they are active primarily at night and near dawn and dusk, and therefore would not be likely to encounter visitors. Thus, impacts on this species from operations under all access variants would be less than significant. Impacts on the movement of this species and other wildlife during operations are discussed below under wildlife corridors.

The text of Mitigation Measure M-BI-1c on draft EIR pages 4.8-51 and 4.8-52 is revised to clarify the requirement to obtain a take permit in circumstances in which special-status plant species cannot be avoided, as follows:

If special-status plants are identified within the active work area and cannot be avoided, the revegetation plan shall include salvage and translocation measures to seed or relocate affected plants to an appropriate nearby revegetation site. The qualified ecologist shall identify those plants for which translocation would likely be successful and feasible, and for each of those species the plan shall include a description of microhabitat conditions necessary for the species, salvage and translocation procedures, seed collection and germination methods, an assessment of potential transplant and enhancement sites, performance criteria (e.g., less than 10 percent coverage by target invasive plants and comparable plant abundance, as deemed appropriate for the affected species), and a long-term monitoring program. If any state-listed or state rare plant species cannot be avoided, SFPUC shall obtain an Incidental Take Permit from CDFW pursuant to Fish and Game Code Sections 2081(b) and/or Section 1900 et seq. prior to any salvage operations, or if salvage and translocation is not feasible.

Special-status plant mitigation areas shall be established at a ratio of 1:1 (impacted area to plantings) based on either the impacted area or the number of impacted individuals, as deemed appropriate by the qualified ecologist. Plants that can be feasibly relocated shall be transplanted into the revegetation site, typically adjacent suitable habitat that is unoccupied, to avoid making transplants into undisturbed occupied habitat and potentially spreading diseases. ~~If salvage and transplantation is not feasible, consistent with the requirements of the Native Plant Protection Act, the SFPUC shall notify the California Department of Fish and Wildlife at least 10 days prior to disturbance to allow for the salvage of rare or endangered native plants that would otherwise be destroyed.~~

The text of Mitigation Measure M-BI-2a on draft EIR pages 4.8-59 through 4.8-61 is revised to include the use of hand tools for vegetation clearing and a full-time monitor during vegetation clearing and initial ground disturbance, as follows:

Mitigation Measure M-BI-2a – Avoidance and Minimization Measures for Special-Status Reptiles and Amphibians.

The following measures shall be implemented before and during construction:

- Construction contractor(s) shall limit the construction disturbance area to that necessary for project construction and avoid outside areas by posting signage delineating the construction disturbance area with flags, stakes, or fencing.
- The SFPUC shall identify a qualified biologist (who has familiarity and field experience with the affected species, as described in M-BI-1d) to act as construction monitor before construction work begins.
- No more than two weeks prior to the onset of work activities and immediately prior to commencing work, the qualified biologist shall conduct a thorough survey of the entire construction footprint for San Francisco garter snake, California red-legged frog, and other special-status species with the potential to be present.
- The SFPUC shall ensure that, during work activities, all trash is properly contained in closed containers, removed from the work site and disposed of daily to avoid attracting predators to the site.
- The contractor and all site personnel in motorized vehicles shall maintain a speed limit of 15 miles per hour within the project area at all times.
- The construction contractor shall install a wildlife exclusion fence in or adjacent to wetland areas where earthmoving equipment will be used. The qualified biologist shall determine specific locations for the exclusion fencing and shall be present during, and oversee vegetation removal for, construction of the exclusion fence. Within San Francisco garter snake habitat areas where vegetation clearing would occur, initial vegetation thinning shall occur using hand tools. If mechanized hand tools such as string trimmers are used within San Francisco garter snake habitat, they will be used in the presence of a biological monitor (see last bullet) who ensures the absence of SFGS immediately ahead of vegetation clearing.
- In San Francisco garter snake habitat, ~~the~~ contractor shall install an exclusion fence containing exit funnels to allow any San Francisco garter snakes within the construction area to leave without

human intervention, while preventing entry of San Francisco garter snake and California red-legged frog into the construction zone. A qualified biologist shall supervise the installation of exclusion fencing along the boundaries of the work area, as deemed necessary by the biologist. Exit funnels shall be placed no more than 200 feet apart along the fence, or as modified by the biological monitor. The exit funnels shall be installed at ground level. The contractor may use a qualified biologist as a full-time biological monitor in place of exclusion fencing. The monitor will survey the trail for the presence of San Francisco garter snake and California red-legged frog. If an individual is observed, the monitor shall follow the procedures set forth in this measure (below) for responding in the event special status species are present within the exclusion fence area.

- At the beginning of each workday that includes initial ground disturbance, including grading, excavation, and vegetation-removal activities, the approved biologist shall conduct onsite monitoring for the presence of these species in the area where ground disturbance or vegetation removal will occur. The biologist shall inspect the perimeter fences to ensure they do not have any tears or holes, that the bottoms of the fences are still buried, and that no individuals have been trapped in the fences.
- Construction work crews shall cover all excavated or deep-walled holes or trenches greater than 2 feet at the end of each workday using plywood, steel plates, or similar materials or shall construct escape ramps of earth fill or wooden planks to allow animals to exit. Before such holes are filled, workers shall thoroughly inspect them for trapped animals.
- If a special-status species is present within the exclusion fence area during construction, work shall cease in the vicinity of the animal, and the animal shall be allowed to relocate of its own volition unless otherwise approved by the regulatory agencies with jurisdiction over the species.
- The contractor shall maintain the temporary fencing—both exclusion fencing and protective fencing (if installed)—until all construction activities are completed. No construction activities, parking, or staging shall occur beyond the fenced exclusion areas. After construction is completed, the contractor shall remove exclusion fencing, cover boards, and all associated debris and either store or dispose of it off site.
- Project personnel shall be required to immediately report any harm, injury, or mortality of a special-status species during construction (including entrapment) to the biological monitor, who shall immediately notify the SFPUC. As appropriate, the SFPUC shall provide verbal notification to the U.S. Fish and Wildlife Service’s Endangered Species Office in Sacramento, California and/or to the California Department of Fish and Wildlife warden or biologist (as applicable) and written notification, as requested, by the agencies.
- Full-time biological monitoring shall be provided during vegetation clearing and initial ground disturbance within San Francisco garter snake habitat. Once all clearing and initial ground-disturbing activities are completed, the biological monitor shall perform spot checks of the project area at least once a week, and daily between November and April during rain events, for the duration of construction to ensure that the perimeter fence is in good order, trenches are being covered if left open overnight (or escape ramps provided), project personnel are conducting checks beneath parked vehicles prior to their movement, and all other required biological protection measures are being followed.

The text of Mitigation Measure M-BI-2c on draft EIR pages 4.8-72 and 4.8-27 is modified to include relocation and notification, as follows:

Mitigation Measure M-BI-2c – Avoidance and Minimization Measures for Dusky-Footed Woodrat and American Badger.

The following measures shall be implemented to avoid and minimize impacts on dusky-footed woodrat and American badger, if present:

- A qualified biologist with experience identifying woodrat nests and badger dens shall conduct a preconstruction survey for San Francisco dusky-footed woodrat nests and American badger dens in suitable habitat along: the universal access loop trail, staging area, parking lots; the southern skyline ridge trail work area, parking lot, and staging areas; and all fencing work areas along the southern skyline ridge trail and Fifield-Cahill ridge trail. The qualified biologist shall flag active nests/dens identified within the project work areas as a sensitive resource to be avoided during construction.
- Should avoidance of active woodrat stick nests within the project site not be feasible, the nests material shall be dismantled by hand and relocated to a nearby area under the supervision of the qualified biologist, ~~consistent in coordination~~ with California Department of Fish and Wildlife ~~guidance and permits, as applicable~~. If young are encountered during dismantling/relocation of the nest material, the material shall be replaced placed back and a 20-foot no-disturbance buffer shall be established around the active nest. The biologist shall inspect the nest at least 2448 hours later to see if the young are present. If the young are still present, the buffer shall remain in place until the woodrats have matured enough to disperse on their own accord ~~and the nest is no longer active~~.

The text of Mitigation Measure M-BI-4 on draft EIR page 4.8-89 is modified to clarify that litter and food waste shall be collected and removed during daily sweeps, as follows:

- The SFPUC shall provide closed (wildlife-proof) garbage containers at trailhead parking areas for the disposal of trash items (e.g., wrappers, cans, bottles, food scraps) and empty them daily. The SFPUC shall scan the project area and remove ~~for~~ litter and food waste during daily sweeps.

12.7 Revisions to Section 4.10, Hydrology and Water Quality

The text of Impact HY-3 on draft EIR page 4.10-22, second paragraph, is revised as follows:

As discussed for the proposed access program in this EIR's Chapter 2, Project Description, Section 2.7.1, Trail Access Management Program and Visitation, the SFPUC would install barbed-wire fencing and lockable gates along the southern skyline ridge trail. The public could access the trail through these gates for approximately eight hours per day during daylight hours. The SFPUC would ensure that permit holders have completed educational programs that emphasize the importance of protecting water quality. The trail realignment and bridge would avoid the wetlands identified along the southern skyline ridge trail, and SFPUC project operations and maintenance activities would similarly avoid these areas. However, as discussed in Impact HY-2, visitors would be allowed to traverse the drainage that bisects the unimproved portion of the trail alignment. Visitor traffic could cause disturbances to soils and potential siltation, as well as the introduction of animal wastes (e.g.,

horse manure), when water is present in the drainage. However, because the drainage is seasonal and is located a considerable distance (approximately 1 mile), and the project trails are generally between several hundred and a few thousand feet, from any receiving waters, the potential impact would be less than significant.

12.8 Revisions to Section 4.13, Topics Not Requiring Detailed Environmental Analysis

The text on draft EIR page 4.13-5 is revised as follows to clarify the potential effects related to emergency services:

The management plan EIR concludes that the establishment of new trails and amenities, along with expanded public access, would not have a significant impact on public services.¹⁰ Increased visitor use along watershed trails under the proposed project would be expected to result in an increase in demand for emergency services. There are few studies that have examined the relationship between outdoor recreation and emergency service calls in California or the broader United States. However, incident data from the Midpeninsula Regional Open Space District is available. Considering the proximity of district lands, recreational trails provided, and types of trail use allowed, the data are relevant and considered representative of the emergency response incidence that would be expected under the project.

The district manages approximately 63,000 acres of open space lands, which host approximately 245 miles of multi-modal access trail (i.e., hikers, bicyclists, equestrians), and receive approximately 2 million visitors per year.^{10a,10b} The district property nearest the project site is the Purisima Redwood Creek Open Space Preserve, located adjacent to the peninsula watershed, opposite S.R. 35 from the terminus of the proposed southern skyline ridge trail. District properties are patrolled by district rangers, who possess law enforcement, fire suppression, and emergency medical response capabilities, and work in coordination with state, regional, and local emergency services agencies.

The district's 2015 Field Enforcement Activity Report and Ten-Year Field Activity Summary (the most recent available), indicates that district rangers responded to 66 accidents and medical incidents district-wide in 2015.^{10c} Among these, seven were within the Purisima Redwood Creek Open Space Preserve, which is above the 10-year average of just over four for this preserve. Of the seven incidents in 2015, six involved a response by San Mateo County Fire, two of which also included a response by Kings Mountain Fire Brigade. During this period, district rangers also responded to 14 fire incidents district-wide, nine of which were on district lands, and none of which were at Purisima Redwood Creek Open Space Preserve. The report notes that fire incidents on district lands were mostly extinguished fire rings.^{10d,10e}

Under the proposed project, annual watershed visitation could increase to between 25,000 and 50,000 visitors per year. As explained in Chapter 2, Project Description (page 2-35), SFPUC staff, which are trained in fire suppression and emergency medical response capabilities, would be onsite and continue to conduct regular patrols, the level of which would increase depending upon the access program selected. Accordingly, SFPUC watershed staff would likely be the first responders in the event of an emergency, and would work with state, regional, and local emergency services agencies as needed. As the required emergency response times in San Mateo County are lower for paramedic fire

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12.8 Revisions to Section 4.13, Topics Not Requiri

than for ambulance responders, regional and local fire department personnel would likely respond first in the event of an emergency within the project area.^{10f} Under the San Mateo County's emergency response system, the closest fire engine and ambulance is dispatched to every medical incident, regardless of the local fire agency boundaries.^{10g}

The King's Mountain Fire Brigade Station 56 is located approximately 1 mile south of the southern terminus of the proposed 6-mile-long southern skyline ridge trail, and is the station closest to the approximately 14 linear miles of existing and proposed trails that are the subject of the EIR. However, there are also several other county fire stations in proximity to, and in some cases closer to other segments of, the project trails. These include San Mateo County Fire Station 17, located approximately 4.8 miles from the project site; San Mateo County Fire Station 27, located approximately 4.9 miles from the project site; and Central County Fire Station 33, located approximately 6 miles from the project site, among others within 7 miles of the project site.

Based upon emergency response data from the Midpeninsula Regional Open Space District, the number of project-related incidents requiring emergency services is not expected to be substantial (i.e., about three to five per year). In the event of an emergency, SFPUC staff would serve as first responders, aided by state, regional, and local first responders, as needed. Considering the small number of incidents expected, the county's approach to emergency response dispatch, and the number of fire departments in proximity to the project area, the project would not be expected to have a substantial adverse effect on regional emergency services providers, nor a disproportionate burden on any individual provider. For these reasons, and given ~~The the~~ the project is not expected to cause an increase in population, ~~and therefore would be no substantial effect on~~ not significantly affect service ratios, response times, or other performance objectives for public services such that a new or altered governmental facility would be required.

The Bay Area Ridge Trail provides a recreational public service. Sections 4.2 through 4.12 of this EIR address the potentially significant impacts of this trail extension project for each related environmental topic. For example, Section 4.11, Hazards and Hazardous Materials, evaluates the potential fire risk during construction and the adverse effects associated with increased public access within the watershed.

¹⁰ San Francisco Planning Department, *Peninsula Watershed Management Plan Final Environmental Impact Report*, Section III.K and V.K, Utilities and Public Services (pp. III.K-1 through III.K-7, and V-41).

^{10a} Midpeninsula Regional Open Space District, 2020, Brochure and Map. Available at: https://www.openspace.org/sites/default/files/district_map.pdf; accessed March 10, 2021.

^{10b} Midpeninsula Regional Open Space District, 2015. Annual Update 2014/2015. Available at: https://www.openspace.org/sites/default/files/AR_14-15.pdf; accessed March 10, 2021.

^{10c} Accidents and medical incidents include hiking, bicycling, equestrian and other medical responses such as motor vehicle accidents and other medical events.

^{10d} Midpeninsula Regional Open Space District. 2015. Calendar Year 2015 Field Enforcement Activity Report and Ten-Year Field Activity Summary. March 23, 2015.

^{10e} Midpeninsula Regional Open Space District. 2021. Email correspondence between Elijah Davidian (ESA) and Deborah Bazar (MidPen) re: Southern Skyline Ridge Trail Project - MidPen/Purisima Enforcement Activities Report.

^{10f} San Mateo County. 2017. System Overview Report – San Mateo County Emergency Medical Services, FY 2016-2017. Available online at: https://www.smchealth.org/sites/main/files/file-attachments/ems_system_overview_report_2016-17_1.pdf?1520536224, accessed March 10, 2021.

^{10g} San Mateo County, 2020. Emergency Medical Services - General Information. Available at: <https://www.smchealth.org/ems/background>; accessed on March 10, 2021.

12.9 Revisions to Chapter 6, Alternatives

The text of Table 6-3, page 6-13, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, row Transportation and Circulation, is revised as follows:

Table 6-3 Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives [Excerpt]

Environmental Resource	Project	Alternative A: No Project	Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92	Alternative C: Pedestrian-Only Trail Access	Alternative D: Alternative Trail Alignment
Transportation and Circulation	Impact TR-5: Project operations would not create potentially hazardous conditions for vehicles entering and exiting the project area; however, project operations would increase the risk of conflicts between vehicles and pedestrians, bicyclists, or equestrians attempting to cross State Route 92.	No impact.	Hazard posed by visitors crossing S.R. 92 would be eliminated <u>or substantially lessened</u> ; reduced impact related to vehicles turning to and from relocated parking lot; less than significant.	Slightly reduced, due to lower overall visitation (no bicycle or equestrian use; significant and unavoidable with mitigation).	Slightly reduced, hazard posed by visitors crossing S.R. 92 would be shifted to new trail alignment; significant and unavoidable with mitigation; hazards posed by vehicles turning into parking lot would be reduced; significant and unavoidable with mitigation.

The text of Table 6-4, page 6-18, first row, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised as follows:

Table 6-4 Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives, by Access Program Configuration [Excerpt]

Project	Alternative A: No Project	Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92	Alternative C: Pedestrian-Only Trail Access	Alternative D: Alternative Trail Alignment
Proposed Access Program (supervised access on unfenced Fifield-Cahill ridge trail, and unsupervised and restricted (i.e., with a permit) access on fenced southern skyline ridge trail): SUM impacts related to transportation hazards and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.	No impact.	Reduced; avoids <u>or substantially lessens</u> transportation impact, somewhat smaller project footprint. SUM impact related to spread of plant pathogens. LSM impacts related to <u>transportation</u> , cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.	Similar to project. Construction impacts same as project. Some operations impacts slightly reduced due to lower overall visitation. Continued SUM impacts related to transportation hazards and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.	(Supervised access on fenced Sweeney Ridge connector, unsupervised and unrestricted access on fenced Crystal Springs Regional Trail connector) Increased; reduces butterfly and plant pathogen impacts; somewhat reduces transportation impact; increases special-status reptiles and amphibians, special-status plants, and sensitive natural communities impacts; reduces intensity of other effects due to

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12.9 Revisions to Chapter 6, Alternatives

Project	Alternative A: No Project	Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92	Alternative C: Pedestrian-Only Trail Access	Alternative D: Alternative Trail Alignment
				substantially smaller project footprint. SUM impacts related to transportation hazards and special-status reptiles and amphibians. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.

The text of Table 6-4, page 6-19, first row, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised as follows:

Table 6-4 Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives, by Access Program Configuration [Excerpt]

Project	Alternative A: No Project	Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92	Alternative C: Pedestrian-Only Trail Access	Alternative D: Alternative Trail Alignment
<p>Access Program Variant 2 (unsupervised and unrestricted access on fenced Fifiel-Cahill ridge trail and fenced southern skyline ridge trail):</p> <p>SUM impacts related to transportation hazards; special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.</p>	No impact.	Reduced; avoids <u>or substantially lessens</u> transportation impact; somewhat smaller project footprint. SUM impacts related to <u>transportation</u> , special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards	Reduced; avoids special-status amphibian and reptile impact; retains transportation, special-status-butterfly, and plant pathogens impact; some operations impacts slightly reduced due to lower overall visitation; other impacts same as project. SUM impacts related to transportation hazards, special-status butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.	(Unsupervised and unrestricted access on fenced Sweeney Ridge connector and fenced Crystal Springs Regional Trail connector) Similar to project; reduces special-status butterfly and plant pathogen impacts; somewhat reduces transportation impact; increases special-status reptiles and amphibians, special-status plants, and sensitive natural communities impacts; reduces intensity of other effects due to substantially smaller project footprint. SUM impacts related to transportation hazards and special-status reptiles and amphibians. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.

The text of Table 6-4, page 6-19, second row, column Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92, is revised as follows:

Table 6-4 Comparison of the Significant Environmental Impacts of the Project vs. the Impacts of the Alternatives, by Access Program Configuration [Excerpt]

Project	Alternative A: No Project	Alternative B: Relocated Parking Lot and Trailhead South of S.R. 92	Alternative C: Pedestrian-Only Trail Access	Alternative D: Alternative Trail Alignment
<p>Access Program Variant 3 (unsupervised and restricted (i.e., with a permit) access on fenced Fifield-Cahill ridge trail and fenced southern skyline ridge trail):</p> <p>SUM impacts related to transportation hazards; special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.</p>	<p>No impact.</p>	<p>Reduced; avoids <u>or substantially lessens</u> transportation impact; somewhat smaller project footprint. SUM impacts related to <u>transportation</u>, special-status amphibians, reptiles, and butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.</p>	<p>Reduced; avoids special-status amphibian and reptile impact; retains transportation, special-status-butterfly, and plant pathogens impacts; some operations impacts slightly reduced due to lower overall visitation; other impacts same as project. SUM impacts related to transportation hazards, special-status butterflies, and spread of plant pathogens. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.</p>	<p>(Unsupervised and restricted access on fenced Sweeney Ridge connector, unsupervised and unrestricted access on fenced Crystal Springs Regional Trail connector)</p> <p>Similar to project; reduces special-status butterfly and plant pathogen impacts; somewhat reduces transportation impact; increases special-status reptiles and amphibians, special-status plants, and sensitive natural communities impacts; reduces intensity of other effects due to substantially smaller project footprint. SUM impacts related to transportation hazards and special-status reptiles and amphibians. LSM impacts related to cultural and tribal cultural resources, noise, air quality, biological resources, and fire hazards.</p>

The text of Section 6.3.2.3, *Environmental Impacts*, page 6-21, is revised as follows:

6.3.2.3 ENVIRONMENTAL IMPACTS

Implementation of Alternative B would eliminate or substantially lessen a significant operations impact and decrease the intensity of some of the other significant construction and operations impacts identified for the project.

The text of Section 6.3.2.3, *Environmental Impacts*, pages 6-22 and 6-23, beginning with the first paragraph under subheading *Operations*, is revised as follows:

OPERATIONS

The 1.5-mile gap between S.R. 92 and the southern skyline ridge trail relocated trailhead would remove an incentive for visitors of one trail segment to attempt crossing S.R. 92 to reach the opposite segment. In addition to the challenge of crossing the busy S.R. 92, the intervening stretch of S.R. 35 is a narrow, winding road, with a minimal shoulder in most locations – conditions expected to be unappealing to pedestrians, equestrians, and cyclists who might otherwise be tempted to cross S.R. 92 to bridge a shorter trail gap. While such conditions would be expected to deter most, it is possible that some trail users might still travel between the two trail segments. The installation of signs at the southern terminus of the Fifield-Cahill ridge trail and northern terminus of the southern skyline ridge trail similar to those identified in Mitigation Measure M-TR-5a would further reduce the potential for visitors to attempt crossings of S.R. 92. For these reasons, the operational transportation hazard identified for the project would be substantially lessened under Alternative B.

Given the distance and roadway conditions described, and with installation of signage, pedestrians and equestrians would not be expected to cross S.R. 92 to reach an opposite project trail segment. The segment of S.R. 35 extending south from S.R. 92 is identified by the City/County Association of Governments of San Mateo County (C/CAG) as a “cyclist suggested route” and a proposed class III bicycle route.^{1a,1b} Considering these designations, and the prevalence of cycling activity in the region, it is possible that a small number of cyclists might attempt to traverse the S.R. 35/92 intersection and 1.5 mile of S.R. 35 to reach the opposite project trail segment.

Thus, for the reasons described, Alternative B would avoid or substantially lessen the significant and unavoidable transportation and circulation impacts identified for the project (Impact TR-5). However, because the Fifield-Cahill ridge trail improvements would be the same as the project, Alternative B operations with unsupervised access along the Fifield-Cahill ridge trail could also result in significant and unavoidable impacts on San Francisco garter snake, California red-legged frog, Mission blue butterfly, and San Bruno elfin butterfly (Impact BI-5). Similarly, Alternative B operations with unsupervised access could result in substantial adverse impacts related to the spread of *Phytophthora* pathogens (Impact BI-7).

Operations impacts associated with the Fifield-Cahill ridge trail improvements would be the same as for the project (Impacts CU-3, CU-4, TCR-2, BI-4, BI-5, and HZ-8). However, operations impacts for the southern skyline ridge trail related to cultural and tribal cultural resources, biological resources, fire hazards would be slightly reduced, relative to those identified for the project (Impacts CU-3, CU-4, TCR-2, BI-5, and HZ-8) because with a southern shift in the southern skyline ridge trail parking lot and trailhead and a correspondingly shorter southern skyline ridge trail, visitors would use a smaller portion of the watershed as compared to the project. This would result in reduced potential for inadvertent discovery and damage to archeological resources, human remains, and other cultural resources of tribal cultural significance; a lower likelihood of encountering and harming California red-legged frog and nesting birds and their habitats; and slightly reduced wildfire hazard risk. As explained for Alternative B construction, the key drivers of the above-referenced operations-related impacts would be substantially similar to those identified for the project. For these reasons, the planning

department expects that Alternative B would result in similar types of significant impacts as the project and require the same mitigation measures identified for project operations to reduce the operations impacts of Alternative B to less-than-significant levels.

In summary, the overall intensity of construction and operations impacts would be slightly reduced under Alternative B relative to the project due to relocating southern skyline trailhead and parking area to the south, which would result in a 25 percent reduction in the length of new trail construction, and a 10 percent reduction in overall length of newly accessible trail for the SFPUC to operate and maintain. Alternative B would eliminate or substantially lessen the significant and unavoidable transportation hazards impact. However, significant impacts related to San Francisco garter snake, California red-legged frog, Mission blue butterfly, San Bruno elfin butterfly, and spread of *Phytophthora* pathogens would remain. Albeit slightly reduced, all of the significant-but-mitigable impacts would also remain, and the mitigation measures identified for the project would be required to reduce those impacts to less-than-significant levels. This alternative would not meet the project objectives to the same extent as the project.

^{1a} City/County Association of Governments (C/CAG), 2010, Map - San Mateo County On-Road Bike Routes, Off-Road Multi-Use Trails. Available at: https://ccag.ca.gov/wp-content/uploads/2014/07/SMBikeMap_Coverbooklet.pdf, accessed March 10, 2021.

^{1b} C/CAG, 2011, San Mateo County Comprehensive Bicycle and Pedestrian Plan. Available at: https://ccag.ca.gov/wp-content/uploads/2014/07/CBPP_Main-Report_Sept2011_FINAL.pdf, accessed March 10, 2021.

The text of Section 6.4.2, Operations, page 6-35, is revised as follows:

6.4.2 OPERATIONS

Alternative A would avoid operational impacts because the SFPUC would not implement the project. Relative to the project, alternatives B and C would reduce operational impacts to a similar degree. By removing an incentive for visitors to cross S.R. 92 where no designated crossing exists, Alternative B would avoid or substantially lessen a significant and unavoidable transportation hazard impact identified for the project. Under Alternative B, significant impacts related to special-status amphibians, reptiles, and butterflies, as well as spread of plant pathogens, would remain.

The text of Section 6.4.2, Operations, page 6-36, last paragraph, is revised as follows:

In summary, based on the evaluation above, Alternative B is the environmentally superior alternative among the project alternatives (other than the No Project Alternative). Alternatives D would avoid a significant project impact, but could also result in new or greater significant impacts. Alternative C would similarly avoid a significant project impact and would not result in new or greater significant impacts. However, Alternative B would have the greatest impact reduction because it would avoid or substantially lessen a significant traffic hazard impact, and have a greater reduction in significant-but-mitigable impacts. Alternative B also meets most of the project objectives.

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

EIR Appendix A has been revised to include an addendum to the March 2017 scoping summary memorandum. The addendum summarizes the expanded outreach and presents the full text of the comments received.

APPENDIX A

Notice of Preparation and Scoping Summary Memorandum and Addendum



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memorandum

date: December 16, 2020

to: Timothy Johnston (SF Planning Department); Scott MacPherson (SFPUC)

from: Elijah Davidian

subject: Addendum to the Southern Skyline Boulevard Ridge Trail Project CEQA Scoping Summary, dated March 6, 2017

On March 6, 2017, the San Francisco Planning Department's environmental consultant, ESA, prepared a memorandum summarizing public outreach and comments received during the Southern Skyline Boulevard Ridge Trail Project's environmental impact report (EIR) scoping process. Subsequent to completion of the March 6, 2017 memorandum, the planning department undertook an expanded outreach effort to engage property owners near the project site and, in turn, received additional comments on the scope of the EIR during the associated extended scoping period. This addendum to the March 6 memorandum provides an overview of the expanded outreach and comments received during the extended scoping period.

Expanded Public Outreach

In accordance with section 15082 of the CEQA Guidelines, the planning department published a Notice of Preparation (NOP) of an EIR for the project to responsible agencies and interested parties on December 21, 2016. In addition, on March 30, 2017 the planning department expanded its public outreach by mailing a revised notice of availability (Attachment E¹) of the NOP to 170 owners and occupants of properties within 300 feet of the project site (Attachment F). Distribution of the revised notice extended the scoping period, allowing for submission of additional written comments from the public on the scope and content of the EIR until April 29, 2017.

Expanded Scoping Period Comments

During the expanded outreach period, the planning department received 10 pieces of scoping correspondence (i.e., letters, emails). Among the correspondence received, one was from a community organization and nine were from individuals. Correspondence contained comments relevant to the CEQA process (e.g., whether the project would have a physical effect on the environment), and some correspondence addressed topics beyond the scope of CEQA analysis (e.g., support for the project and social benefits of recreation). A summary of comments received during the scoping period and the text of the correspondence is presented in Attachment G.

¹ The March 6, 2017 memorandum includes Attachments A through D.

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ATTACHMENT E
Revised Notice of Availability of NOP

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12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

Attachment E
SSBRTF Expanded Notice

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SAN FRANCISCO PLANNING DEPARTMENT

REVISED PUBLIC NOTICE OF Availability of Notice of Preparation of Environmental Impact Report

Date: March 30, 2017
Case No.: 2016-016100ENV
Project Title: **Southern Skyline Boulevard Ridge Trail Extension Project**
Zoning: Resource Management District and Residential Estates District
Project Sponsor: San Francisco Public Utilities Commission
 Yin Lan Zhang – (415) 487-5201
 YZhang@sfgwater.org
Lead Agency: San Francisco Planning Department
Staff Contact: Chelsea Fordham – (415) 575-9071
 Chelsea.Fordham@sfgov.org

1650 Mission St.
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 CA 94103-2479

Reception:
415.558.6378

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415.558.6409

Planning
 Information:
415.558.6377

A notice of preparation (NOP) of an environmental impact report (EIR) has been prepared by the San Francisco Planning Department in connection with this project. The NOP is available for public review and comment on the Planning Department's web page (<http://www.sf-planning.org/puccases>). Paper copies are also available at the Planning Information Center (PIC) counter on the first floor of 1660 Mission Street, San Francisco.

Project Description:

The San Francisco Public Utilities Commission (SFPUC) is proposing the Southern Skyline Boulevard Ridge Trail Extension Project (Project), a component of the SFPUC's Peninsula Watershed Management Plan. The Project would involve extending the Bay Area Ridge Trail, modifying access management programs over existing and proposed trail segments, and conveying a permanent easement over an existing trail segment.

The Project's MAIN component, the Southern Skyline Boulevard Ridge Trail Extension (SSBRTE), would be located at the top of Skyline Ridge, 1 to 1.75 miles upslope of Upper Crystal Springs Reservoir. The trail would extend south approximately 6 miles, generally following Skyline Boulevard¹ from Highway 92 to the southern boundary of SFPUC property at the GGNRA Phleger Estate property. Trail support facilities under consideration include new vault toilets, drainage facilities, retaining structures, and security mechanisms (such as fences and gates). In addition, SFPUC would construct two new trailhead parking areas: one just south of the Highway 35/92 intersection (approximately 20 vehicles) and a second larger area (approximately 50 vehicles) to the north of Skylawn Cemetery. SFPUC would also construct a new, approximately 0.5-mile accessible loop trail along the existing Fifield/Cahill Trail and acquire a permanent

¹ Skyline Boulevard is also referred to as Highway 35 in this location.

www.sfplanning.org

Availability of Notice of Preparation of an EIR
March 30, 2017

Case No. 2016-016100ENV
Southern Skyline Blvd. Ridge Trail Extension

trail easement (currently held by the Bay Area Ridge Trail Council) in the vicinity of Skylawn Funeral Home and Memorial Park, north of Highway 92.

The EIR is considering range of trail access management program alternatives varying between the least and the most restrictive options for both existing and new segments of the Fifield-Cahill Ridge Trail and Southern Skyline Boulevard Ridge Trail. The options under consideration are referred to as Option 1: Docent Program and Option 2: Unsupervised Access. These options would apply to both existing and proposed segments of trail. Under both Options 1 and 2, multi-modal access (pedestrians, bicyclists, equestrians) would be provided. The Planning Department initiated an outreach process, generally referred to as scoping, to notify the public of the project and to determine the appropriate scope of the environmental review. On December 21, 2016, the Planning Department and SFPUC published notice of the scoping period in local newspapers, their websites, and circulated the NOP for public review. The SFPUC hosted one scoping meeting on January 18, 2017.

The Planning Department is now expanding its outreach to include owners and occupants of properties within 300 feet of proposed Project components. Your comments concerning the scope of the EIR will be accepted until April 29, 2017. Written comments should be sent to Lisa Gibson, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103 or Lisa.Gibson@sfgov.org. Referenced materials are available for review by appointment at the Planning Department's office on the fourth floor of 1650 Mission Street. To schedule an appointment, call (415) 575-9025.

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

ATTACHMENT F
Extended Scoping Period Distribution List

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

Attachment F
Ridge Trail Expanded Outreach List

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12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

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12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

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12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

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DEFIORE JOHN E
ROLETTO JANETTE
225 OLD RANCH RD
WOODSIDE, CA 94061

CURRENT OCCUPANT
227 OLD RANCH RD
WOODSIDE, CA 94062

MCINTIRE KENNETH M
MCINTIRE JOAN B C
235 OLD RANCH RD
WOODSIDE, CA 94062-4576

KROMAT DAN TR
KROMAT HEIDI TR
KROMAT TRUST
240 OLD RANCH RD
WOODSIDE, CA 94062-4528

REEVES CAROL L
275 OLD RANCH RD
WOODSIDE, CA 94062-4576

PETERSON ERIK
500 ORACLE PARKWAY MS 40P12
REDWOOD SHORES, CA 94065

PAUL WILLIAM J TR
PAUL CHERYL L TR
PAUL WILLIAM & CHE
207 PURISIMA RD
WOODSIDE, CA 94062-4531

BARRY THOMAS W TR
CHRISTENSEN BREND
BARRY TRUST
225 PURISIMA RD
WOODSIDE, CA 94062-4531

MORRISON DAVID W & KAREN R
248 PURISIMA RD
WOODSIDE, CA 94062-4577

CURRENT OCCUPANT
207 PURISSIMA RD
WOODSIDE, CA 94062

CURRENT OCCUPANT
222 PURISSIMA RD
REDWOOD CITY, CA 94062

CURRENT OCCUPANT
225 PURISSIMA RD
WOODSIDE, CA 94062

CURRENT OCCUPANT
248 PURISSIMA RD
REDWOOD CITY, CA 94062

CURRENT OCCUPANT
1 QUAIL CT
WOODSIDE, CA 94062

SHER JUSTIN W
KNIAZ LORENA B
5 QUAIL CT
WOODSIDE, CA 94062-4534

CURRENT OCCUPANT
6 QUAIL CT
WOODSIDE, CA 94062

CASON BRIAN A
GORDON HELEN J
9 QUAIL CT
WOODSIDE, CA 94062-4534

CURRENT OCCUPANT
100 REDWOOD TERRACE
WOODSIDE, CA 94062

KING MATTHEW JAMES
KING MARIA NURSI
80 REDWOOD TERRACE
WOODSIDE, CA 94062

PEDERSEN ERIC N
PEDERSEN JULIE
85 REDWOOD TERRACE
WOODSIDE, CA 94062

MOBRATEN CHARLES TR
MOBRATEN LINDA TR
MOBRATEN CHARLES &
1330 REDWOOD TERRACE RD
WOODSIDE, CA 94062-4621

LE COUNT RICHARD & JILL
2 SHARI CT
NOVATO, CA 94947

RUEHL WILLIAM W TR
RUEHL CINDY M TR
RUEHL WILLIAM W &
13868 SILVER SKY WAY
WOODSIDE, CA 94062

PERRY JASON
RUSCH BRIAN
13872 SILVER SKY WAY
WOODSIDE, CA 94062-4504

CURRENT OCCUPANT
13876 SILVER SKY WAY
REDWOOD CITY, CA 94062

POLONCZEK CHRIS
POLONCZEK MARIA
13876 SILVER SKY WY
REDWOOD CITY, CA 94062

FORSTER CAROL H TR
11200 SKYLINE BLVD
WOODSIDE, CA 94062-4549

BARTLETT JAMES O TR
HAX THEODORE Z TR
BARTLETT HAX TRUST
11222 SKYLINE BLVD
WOODSIDE, CA 94062-4549

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

RICHTER EDWIN TR
RICHTER MARILYN K
RICHTER TRUST
12150 SKYLINE BLVD
REDWOOD CITY, CA 94062-4541

STOCKER ANNY M TR
12160 SKYLINE BLVD
REDWOOD CITY, CA 94062-4541

BAKER THOMAS V TR
BAKER DONNA M TR
BAKER TRUST
12170 SKYLINE BLVD
WOODSIDE, CA 94062

SMITH JUSTIN N
12180 SKYLINE BLVD
WOODSIDE, CA 94062-4541

RIEDEL ANDREW D
12190 SKYLINE BLVD
WOODSIDE, CA 94062-4541

JOHNSON STEPHEN F & E J TRS
12200 SKYLINE BLVD
WOODSIDE, CA 94062-4552

ANANIAN RAYMOND MICHAEL
12250 SKYLINE BLVD
WOODSIDE, CA 94062

SHIFFMAN DANIEL M
CICALESE MARY F
12270 SKYLINE BLVD
WOODSIDE, CA 94062-4552

CLARK ANDREW R
CLARK JULIE
12290 SKYLINE BLVD
REDWOOD CITY, CA 94062

MICHAILOV EVA
MICHAILOV MOMCHIL
12350 SKYLINE BLVD
WOODSIDE, CA 94062-4553

HETRICH JOHN A & RENATE
12354 SKYLINE BLVD
WOODSIDE, CA 94062-4553

CORUCCINI VINCENT T
12356 SKYLINE BLVD
REDWOOD CITY, CA 94062-4553

FRANTZ RICHARD E TR
FRANTZ SUSAN G TR
12360 SKYLINE BLVD
WOODSIDE, CA 94062-4553

STRINGER CHRISTOPHER J TR
STRINGER TRUST
12400 SKYLINE BLVD
WOODSIDE, CA 94062-4554

DAWES PAUL TR
DAWES JANIE TR
DAWES PAUL & JAN T
12422 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
12424 SKYLINE BLVD
WOODSIDE, CA 94062

FRANK VICTOR R & KATSUKO
12450 SKYLINE BLVD
WOODSIDE, CA 94062-4554

STEFANCIK WILLIAM G TR
FLORY ANN T TR
STEFANCIK FLORY TR
12500 SKYLINE BLVD
WOODSIDE, CA 94062-4555

MAUCK CARL F TR
MAUCK LINDA D TR
MAUCK TRUST
12510 SKYLINE BLVD
WOODSIDE, CA 94062-4555

PITT LEE & CYNTHIA CAPPS TRS
12520 SKYLINE BLVD
WOODSIDE, CA 94062-4555

CURRENT OCCUPANT
12585 SKYLINE BLVD
REDWOOD CITY, CA 94062

FIRST SKYLINE CORPORATION
12650 SKYLINE BLVD
WOODSIDE, CA 94062

SKYMOON RANCH LLC
C/O FARMWALD PAUL
12650 SKYLINE BLVD
WOODSIDE, CA 94062

GROSS DAWN M TR
GROSS DAWN M TR
C/O JOANNE L HOWAR
12660 SKYLINE BLVD
WOODSIDE, CA 94062-4556

BIL CRIS INC
12860 SKYLINE BLVD
WOODSIDE, CA 94062

PATIN EUCLID & FRENCH
ATTN: WILLIAM L MC
12860 SKYLINE BLVD
WOODSIDE, CA 94062

HEWETT MICHEAL S
HEWETT DARLA K
12960 SKYLINE BLVD
REDWOOD CITY, CA 94062

STENMARK BETTY ANNE TR
12970 SKYLINE BLVD
WOODSIDE, CA 94062-4559

GABER MILYAUSHA TR
GABER ALICE
12990 SKYLINE BLVD
WOODSIDE, CA 94062

ELPERS JOHN R TR
ABBOTT BEVERLY K
13000 SKYLINE BLVD
WOODSIDE, CA 94062-4560

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

STERN HENRY D TR
STERN MARLENE S T
STERN TRUST
13060 SKYLINE BLVD
WOODSIDE, CA 94062-4560

REBHOLTZ MICHAEL ANTHONY
REBHOLTZ LAURA FR
13070 SKYLINE BLVD
WOODSIDE, CA 94062-4560

GERMAN TIMOTHY A TR
GERMAN CAROLINE L
GERMAN & C.L TRUST
13080 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
13090 SKYLINE BLVD
WOODSIDE, CA

MCCARTHY STACY ANN TR
13186 SKYLINE BLVD
WOODSIDE, CA 94062-4542

TEDESCO SUSAN CAROLE TR
SHADICK JANINE TE
13196 SKYLINE BLVD
WOODSIDE, CA 94062-4542

BROWN JEFFERY V TR
BROWN BONNIE M TR
BROWN JEFF & BONNI
13240 SKYLINE BLVD
WOODSIDE, CA 94062-4561

CURRENT OCCUPANT
13250 SKYLINE BLVD
WOODSIDE, CA 94062

RUBY DENNIS MITCHELL TR
RUBY JANET ADAIR
13260 SKYLINE BLVD
WOODSIDE, CA 94062

ICE CHRISTOPHER M
PALME DIANE SUSAN
13280 SKYLINE BLVD
WOODSIDE, CA 94062-4561

TORRES THALEA A
TORRES DAVID A
13304 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
13330 SKYLINE BLVD
PORTOLA VALLEY, CA 94062

GOEBNER WILLIAM P TR
13340 SKYLINE BLVD
WOODSIDE, CA 94062-4562

WERNIG MARIUS
WERNIG GERLINDE
13344 SKYLINE BLVD
REDWOOD CITY, CA 94062-4562

OLDENDORP JASON B
OLDENDORP AMY LOU
13356 SKYLINE BLVD
WOODSIDE, CA 94062

BUNTON GREG JEFFREY TR
BUNTON RADIKA TR
13370 SKYLINE BLVD
WOODSIDE, CA 94062-4562

GALOUSIN MICHAEL N
GALOUSIN LAURA L
13385 SKYLINE BLVD
WOODSIDE, CA 94062

ROESCH KARIA TR
ROESCH-TUBBS ANNA
TUBBS LYNN ALAN TR
13417 SKYLINE BLVD
WOODSIDE, CA 94062-4581

NEWHALL WILLIAM PARSONS JR
NEWHALL JEAN
13424 SKYLINE BLVD
WOODSIDE, CA 94063-4563

LEROY LIEVEN P
13438 SKYLINE BLVD
WOODSIDE, CA 94062-4563

MERIN DAVID A
MERIN LISA V
13451 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
13503 SKYLINE BLVD
WOODSIDE, CA 94062

TALLEY JOHN R
FUNG LANCE M
13519 SKYLINE BLVD
WOODSIDE, CA 94062-4582

STURIZA RICHARD M TR
AIKEN MARY D TR
STURIZA AIKEN TRUS
13520 SKYLINE BLVD
WOODSIDE, CA 94062-0000

TOWNSLEY EDWIN STUART JR
WARE META S
13560 SKYLINE BLVD
REDWOOD CITY, CA 94062-4543

FLETCHER ALMA K TR
13568 SKYLINE BLVD
WOODSIDE, CA 94062-4543

LEVEQUE DUANE E TR
LEVEQUE JANICE L
LEVEQUE TRUST
13600 SKYLINE BLVD
WOODSIDE, CA 94062-4564

JOHANSEN FREDERICK W
13620 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
13630 SKYLINE BLVD
WOODSIDE, CA 94062

BATKA JAMES F TR
BATKA NOEL M TR
BATKA TRUST
13636 SKYLINE BLVD
WOODSIDE, CA 94062-4564

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

CURRENT OCCUPANT
13660 SKYLINE BLVD
WOODSIDE, CA 94062

ALAFOUZOS NICK M & MARILYN A
13668 SKYLINE BLVD
WOODSIDE, CA 94062-4564

FRAILEY ROGENE R
13670 SKYLINE BLVD
WOODSIDE, CA 94062-4564

MARBURGER JOHN
COHN CATHERINE
13680 SKYLINE BLVD
WOODSIDE, CA 94062-4564

MOUNTANOS PETER
13704 SKYLINE BLVD
REDWOOD CITY, CA 94062-4565

MORIARTY MARK D & DENISE M TRS
13716 SKYLINE BLVD
WOODSIDE, CA 94062-4565

OLSON JERRY R & LORRAINE S
13770 SKYLINE BLVD
WOODSIDE, CA 94062

KLEIN LAURA
PRESTEMON ERIC
13780 SKYLINE BLVD
REDWOOD CITY, CA 94062-4565

OLSON JERRY & LORRAINE
CAUGHLIN WALTER &
13808 SKYLINE BLVD
WOODSIDE, CA 94062-4504

ROY SUMIT
COVELL MICHELE
13830 SKYLINE BLVD
REDWOOD CITY, CA 94062

CURRENT OCCUPANT
13850 SKYLINE BLVD
WOODSIDE, CA 94062

CURRENT OCCUPANT
13866 SKYLINE BLVD
WOODSIDE, CA 94062

NEPON ARI B
NEPON RACHAEL S
13878 SKYLINE BLVD
WOODSIDE, CA 94062

BIKLE ROBERT
BIKLE KELLY
13880 SKYLINE BLVD
WOODSIDE, CA 94062

DESPHANDE VENKATESH
NIRANJAN THARUNA
13890 SKYLINE BLVD
WOODSIDE, CA 94062-0000

RIVAS RONALD A
13850 SKYLINE BLVD #4
WOODSIDE, CA 94062

HENRIK IBSEN PARK INC
ATTN TREASURER HEN
13800 SKYLINE BLVD UNIT 21
WOODSIDE, CA 94062

JENKEL ANNE E TR
JENKEL ANNE E TRU
13250 SKYLINE DR
WOODSIDE, CA 94062

PADILLA TOMAS N JR
PADILLA CYNTHIA S
5 SPRING VIEW LN
GREAT FALLS, MT 59404

LIFEMARK GROUP INC
C/O NORTHSTAR GROU
1900 ST JAMES PL STE 200
HOUSTON, TX 77056

MASCIA WAYNE M & SHARON J TRS
90 TEMELEC CIR
SONOMA, CA 95476-8045

GARBER JONATHAN F TR
FOUGHT BONNIE E T
GARBER FOUGHT TRUS
55 TIPTOE LN
HILLSBOROUGH, CA 94010-6242

CURRENT OCCUPANT
104 WARE RD
WOODSIDE, CA 94062

IRVING BRYAN
SEMENOFF IRVING M
108 WARE RD
WOODSIDE, CA 94062

NATION DERYL
NATION TRACIE
112 WARE RD
WOODSIDE, CA 94062

GREENBERG PETER TR
GREENBERG SUZANNE
GREENBERG PETER &
120 WARE RD
WOODSIDE, CA 94062-4537

DINKINS STEVEN RODNEY
STEELE AMBER NICO
125 WARE RD
WOODSIDE, CA 94062

TURN JEAN TR
TURN JEAN TRUST
130 WARE RD
WOODSIDE, CA 94062-4537

ZHANG YILIN
SUN LIHYUN
140 WARE RD
WOODSIDE, CA 94062-4537

WELSH KEVIN T TR
WELSH AMANDA LATH
POLYVINYL TRUST
145 WARE RD
WOODSIDE, CA 94062-4536

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

CHANG RAYMOND
CHANG SOPHIA
161 WARE RD
WOODSIDE, CA 94062

CROOP VIOLET P TR
170 WARE RD
WOODSIDE, CA 94062-4537

WARD KENNETH J TR
WARD KIMBERLY A T
WARD TRUST
176 WARE RD
WOODSIDE, CA 94062-4537

FOTRE TERRY V
THOMASFOTRE SHARO
180 WARE RD
WOODSIDE, CA 94062-4537

ROCKMORE A JOSEPH TR
ROCKMORE DEBRA TR
195 WARE RD
WOODSIDE, CA 94062

CULVER CRAIG F TR
CULVER CAROL K TR
CULVER TRUST
201 WARE RD
WOODSIDE, CA 94062-4538

FREDRIKSON JON A TR
FREDRIKSON EILEEN
231 WARE RD
WOODSIDE, CA 94062-4538

MNF PROPERTIES LLC
C/O NATHAN FISHER
224 WARREN RD
SAN MATEO, CA 94402

ATTACHMENT G
Extended Scoping Period Comments

Attachment C
Summary of Expanded Outreach Comments

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**SOUTHERN SKYLINE BOULEVARD RIDGE TRAIL PROJECT EIR
SUMMARY OF SCOPING COMMENTS BY COMMENTER (ADDENDUM TO TABLE IN ATTACHMENT D)**

Commenter	Summary of Comment	CEQA Subject Area(s)
<u>Local/Regional Agencies/Organizations</u>		
L10	Midpeninsula Regional Open Space District (Jane Mark) Expresses support for the proposed project since it would provide key regional trail connection between two segments of the Bay Area Ridge Trail.	<ul style="list-style-type: none"> Comment noted
L10	Midpeninsula Regional Open Space District (Jane Mark) Requests that the EIR analyze potential impacts to the District's adjacent recreational facilities, including potential traffic and parking impacts to the North Parking Lot for the Parisima Creek Redwoods Open Space Preserve.	<ul style="list-style-type: none"> Traffic and Circulation
L10	Midpeninsula Regional Open Space District (Jane Mark) Requests coordination meeting with SFPUC to discuss regional trail crossing and potential impacts to North Parking Lot.	<ul style="list-style-type: none"> Project Description
<u>Individuals</u>		
144	Paul Dawes Commenter supports the project and favors multi-use access, including mountain biking.	<ul style="list-style-type: none"> Project Description
145	Nick & Marilyn Alafouzos Prefers supervised access to minimize impacts on wildlife.	<ul style="list-style-type: none"> Biological Resources
145	Nick & Marilyn Alafouzos Expresses concern about illicit campfires.	<ul style="list-style-type: none"> Hazards and Hazardous Materials
145	Nick & Marilyn Alafouzos Policing unsupervised access would be too expensive.	<ul style="list-style-type: none"> Project Description
146	Stacy McCarthy Expresses support for the trail extension with dogs allowed on leash only.	<ul style="list-style-type: none"> Beyond EIR scope
147	Beverly Abbott & J.R. Elpers Expresses favor for unsupervised access because arranging docent service is an obstacle to recreation.	<ul style="list-style-type: none"> Project Description
148	Dr. James Bartlett & Theodore Hax Expresses favor for docent program and is concerned that unsupervised access will increase fire risk, pollution, and degradation of the Watershed.	<ul style="list-style-type: none"> Hazards and Hazardous Materials Hydrology and Water Quality
149	Anna Roesch-Tubbs & Alan Tubbs Commenters own property at 13417 & 13419 Skyline Blvd and are concerned about the proximity of the trail to their property line, and the potential increase in litter, traffic, and safety and security concerns.	<ul style="list-style-type: none"> Transportation and Circulation Merits of the Project
150	Andrew Nourse Commenter supports the project and would be able to use the SSBRITE to bike or walk to public transit connections instead of driving.	<ul style="list-style-type: none"> Transportation and Circulation

Attachment G
Summary of Expanded Outreach Comments

SOUTHERN SKYLINE BOULEVARD RIDGE TRAIL PROJECT EIR (Continued)
SUMMARY OF SCOPING COMMENTS BY COMMENTER (ADDENDUM TO TABLE IN ATTACHMENT D)

<u>Commenter</u>	<u>Summary of Comment</u>	<u>CEQA Subject Area(s)</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>Option 1 will protect drinking water supply but would limit local access to trails.</u>	<ul style="list-style-type: none"> <u>Project Description</u> <u>Hydrology and Water Quality</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>Option 2 should allow unrestricted access to local community, but restricted access to general public to ensure adequate maintenance, safety, and emergency services.</u>	<ul style="list-style-type: none"> <u>Project Descriptions</u> <u>Hazards and Hazardous Materials</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>Under Option 2, a 20 car parking lot would be inadequate.</u>	<ul style="list-style-type: none"> <u>Transportation and Circulation</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>A 50 car parking lot north of Highway 92 would create a dangerous pedestrian crossing situation. Suggests resurrecting the Caltrans overpass project.</u>	<ul style="list-style-type: none"> <u>Transportation and Circulation</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>Requests measures to discourage parking on Kings Mountain Volunteer Fire Brigade at 13889 Skyline Blvd.</u>	<ul style="list-style-type: none"> <u>Comment noted</u>
<u>151</u> <u>Carrie & Tim German</u>	<u>Expresses desire for regular forest maintenance to reduce fire hazards caused by traffic along Skyline Blvd.</u>	<ul style="list-style-type: none"> <u>Hazards and Hazardous Materials</u> <u>Transportation and Circulation</u>
<u>152</u> <u>Fred Johansen</u>	<u>Expresses concerns related to increased traffic, user security, and water quality risk and does not support the proposed project.</u>	<ul style="list-style-type: none"> <u>Merits of the Project</u> <u>Traffic and Circulation</u> <u>Hydrology and Water Quality</u>

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary



Midpeninsula Regional Open Space District

April 28, 2017

Lisa Gibson, Director of Environmental Planning
City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Revised Public Notice of Availability of Notice of Preparation of Environmental Impact Report for the Southern Skyline Boulevard Ridge Trail Extension Project (Case No. 2016-016100ENV)

Dear Ms. Gibson,

On behalf of the Midpeninsula Regional Open Space District (District), we respectfully submit the following comments regarding the Notice of Preparation (NOP) of Environmental Impact Report (EIR) for the Southern Skyline Boulevard Ridge Trail Extension Project. The District supports the Southern Skyline Boulevard Ridge Trail Extension Project as it would provide a key regional trail connection between two segments of the Bay Area Ridge Trail in San Mateo County.

The District owns and manages approximately 63,000 acres of open space land on the San Francisco Bay Peninsula, including the Purisima Creek Redwoods Open Space Preserve which is located adjacent to the southernmost end of the proposed project site across Highway 35 (Skyline Boulevard). Our mission is:

To acquire and preserve a regional greenbelt of open space land in perpetuity; protect and restore the natural environment; and provide opportunities for ecologically sensitive public enjoyment and education.

The District's 26 Open Space Preserves include redwood, oak, and fir forests, chaparral-covered hillsides, riparian corridors, grasslands, and wetlands along the San Francisco Bay. Ranging from 55 to over 18,000 acres, 24 of the 26 preserves are open to the public free of charge, 365 days a year.

Given the project's proximity to District lands, the environmental analysis of this project should address potential impacts to the District's adjacent recreational facilities. Within in the vicinity of the proposed project, the District owns and manages an existing trailhead and parking area of approximately 30 spaces which is currently well-used by visitors and neighbors at the Purisima Creek Redwoods Open Space Preserve (Preserve). The southernmost connection of the proposed trail, at the Phleger Estate, would be approximately one half mile from the Preserve's North Parking Lot. Per initial discussions with the San Francisco Public Utilities Commission (SFPUC) staff, we understand that the proposed trail would cross Highway 92 near or at the Preserve's North Parking Lot.

At peak use generally on the weekends, the parking lot is full where overflow vehicles would park along Highway 35. The proposed project would bring additional visitors to the District's trailhead and parking

Midpeninsula Regional Open Space District
April 28, 2017
Page 2

lot. The EIR should analyze potential impacts to the Purisima Creek Redwoods Open Space Preserve, and particularly to the North Parking Lot that may result from increased traffic and additional parking needs of the proposed project. The District requests a coordination meeting with the SFPUC and City of San Francisco Planning staff to discuss the regional trail crossing and the potential additional impacts to the Preserve's North Parking Lot off of Highway 92.

We appreciate the opportunity to comment on this NOP. Should you have any questions about this letter, please contact me at jmark@openspace.org or at (650) 691-1200.

Sincerely,



Jane Mark, AICP
Planning Manager

CC: Ana Ruiz, AICP, Assistant General Manager, Midpeninsula Regional Open Space District
Janet McBride, Bay Area Ridge Trail

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

From: Paul Dawes <pauljdawes@gmail.com>

Date: April 2, 2017 at 3:36:32 PM CDT

To: lisa.gibson@sfgov.org

Subject: S. Skyline ridge trail extension

Hi Lisa

I am a homeowner on Skyline Blvd near Hwy 92 and received the letter regarding the EIR for the skyline ridge trail extension. I really hope it is a multi use trail as well (i.e. Mountain bikers)!

I think it is a GREAT idea (long overdue actually). Please let me know if I can be of any assistance!

Thanks

Paul Dawes

(650) 678-2600

Sent from my iPad

From: "nmalafouzos@netzero.net" <nmalafouzos@netzero.net>

Date: April 3, 2017 at 4:44:56 PM GMT-6

To: Lisa.Gibson@sfgov.org

Subject: Southern Skyline Blvd. Ridge Trail Extension

Dear Ms.Gibson,

I'm writing in regards to the opening up up the Southern Skyline Trail.

My wife and I are residents of Kings Mountain, we live approximately 1/4 mile south of the SF Watershed southern border gate, near the Bella Vista restaurant. We really don't have any objections to opening that part of the Watershed as long as it is supervised.

I'm a one-year retired SF Water Dept. Heavy Equipment Operator that worked extensively on the Peninsula Watershed. I'm also a bicycle docent for the watershed.

What I always tell the public that come out for the rides, is that it's a privilege to be able to ride out there because of how pristine the environment is. That the wildlife is not as affected by massive amounts of people going through the Watershed unsupervised. There are not very many places in the Bay Area that are like this. By supervising the people who want to use the trail, it keeps the impact on the wildlife to a minimum.

Also in our experience of living here for the past 24 years, we've have come across people creating campfires in areas that people are not allowed to be.

Policing the trail like Mid-Pen does for their Open Space would create a major expense for the City.

I would prefer not to open the Watershed at all for safety's sake. But the public should be allowed to experience it, only supervised.

Thank you for your consideration,

Nick and Marilyn Alafouzos
13668 Skyline Blvd.
Woodside, Ca. 94062

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

From: smccarthy <smccarthy@palette17.com>
Date: April 5, 2017 at 11:59:15 AM GMT-6
To: "lisa.gibson@sfgov.org" <lisa.gibson@sfgov.org>
Subject: Re: Southern Skyline Boulevard Ridge Trail Extension Project.

Dear Lisa,

I am a resident of King's Mountain near where the trail is proposed.
I wanted to send you a note to say that I support this trail extension.
I would only ask that dogs on leash be allowed as well.

Much thanks,
Stacy McCarthy

From: Beverly Abbott <bjkabbott@aol.com>
Date: April 3, 2017 at 3:36:19 PM GMT-6
To: Lisa.Gibson@sfgov.org
Cc: <jrelpers@aol.com>
Subject: Southern Skyline Boulevard Ridge Trail Extension Project -2016-016100ENV

Dear Ms. Gibson

I am writing about the above referenced project. My husband and I are residents on Skyline Blvd. We are both in favor of the Option 2: Unsupervised Access. Under Option: 1 access to this valuable trail extension would be limited. We live next to the Purissima Open Space hiking area where there is lots of access and no docents. With few exceptions, we find that the people who are attracted to hiking in this area are good stewards of the property and wild life. Having to arrange a docent puts an unnecessary obstacle in the way of people who would enjoy the proposed area.

Please approve Option 2

Thank you

Beverly Abbott and J.R. Elpers
13000 Skyline Blvd
Woodside CA 94062

12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

From: james bartlett <jobsailor44@hotmail.com>
Date: April 3, 2017 at 10:54:14 AM GMT-6
To: "Lisa.Gibson@sfgov.org" <Lisa.Gibson@sfgov.org>
Subject: Southern Skyline Boulevard Ridge Trail Extension Project

Dear Ms Gibson,

We live on Skyline Blvd approximately 1.2 miles from the 92/35 intersection, across from the proposed trail discussed in your letter.

We would like to urge using the Docent Program for trail access in the watershed/wildlife preserve. We think unsupervised access will needlessly increase the risk of fire, pollution and degradation of the watershed.

It is our understanding that the Docent Program has worked well in the Northern part of the water shed and think it prudent that this same access is required for the Southern extension of the trail.

Sincerely,

Dr. James Bartlett
Mr. Theodore Hax

From: Anna Roesch-Tubbs <aroeschtubbs@gmail.com>
Date: April 23, 2017 at 9:07:32 PM PDT
To: lisa.gibson@sfgov.org
Subject: Fwd: Proposed hiking trail-Case no 2016-06100ENV

Dear Lisa,

This is in response to Case No. 2016-016100ENV- Southern Skyline Blvd Ridge Trail.

I own the property at 13417 & 13419 Skyline Blvd. Woodside CA. I am very concerned that the trail is about 15 feet from the back of my property line.

You can see my house from the proposed trail. I think this will increase people traffic, litter, the potential for safety and security of my home.

My parents moved up to the Skyline area for the peace and quiet in the 70's. This will make for a very stressful life for us. I have issues that my property value will decline as well as the ability to get good renters. Please move the train further down 300 yards from the Back of the property lines of the owners that are affected.

Sincerely

Anna Roesch-Tubbs,
Alan Tubbs
13419 Skyline Blvd,
Woodside CA 94062
650 303 3427

Begin forwarded message:

From: Anna Roesch-Tubbs <aroeschtubbs@gmail.com>
Subject: Proposed hiking trail
Date: April 23, 2017 at 8:55:09 PM PDT
To: Anna Roesch-Tubbs <aroeschtubbs@gmail.com>



12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

Sent from my iPhone

From: "Andrew Nourse" <andy@tiedeve.com>
To: "Gibson, Lisa (CPC)" <lisa.gibson@sfgov.org>
Subject: EIR: Southern Skyline Boulevard Ridge Trail SUPPORT

There is some positive environmental impact:

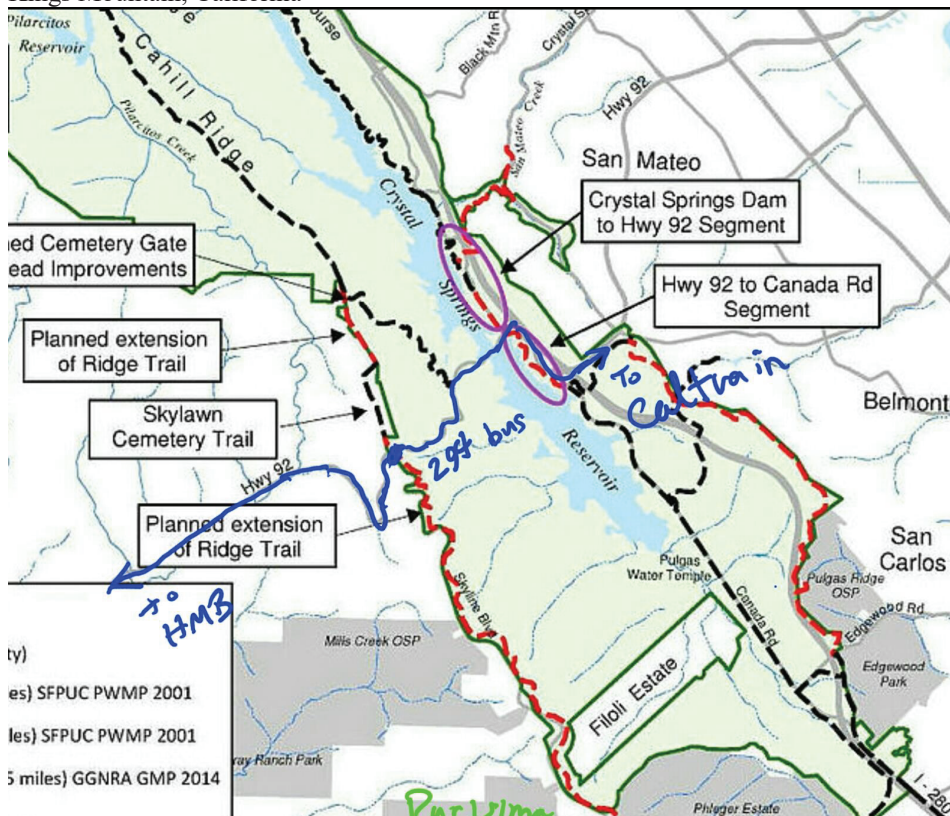
Walking or riding a bike to the nearest bus stop becomes much much safer and more appealing for Kings Mountain residents, reducing the number of car trips by residents.

I am a Kings Mountain resident, and I would use the new trail for this.

The new trail will provide a valuable connection to some popular existing trails in the Purisima Open Space preserve. Those driving up to ride on those trails may start their rides closer to town and ride the new trail, and they will also have the option to get to the trailhead by bus (which has bike racks), which connects to Caltrain (also carries bikes) resulting in shorter and fewer car and truck trips.

I strongly support this project, as a resident who rides a bicycle and as an environmentalist.

Andrew Nourse
Kings Mountain, California



12. Draft EIR Revisions

12.10 Revisions to Appendix A, Notice of Preparation and Scoping Summary

From: carrieg2@aol.com [<mailto:carrieg2@aol.com>]
Sent: Thursday, April 27, 2017 2:33 PM
To: Gibson, Lisa (CPC); Fordham, Chelsea (CPC); Zhang, Yin Lan (PUC)
Subject: Southern Skyline Boulevard Ridge Trail Extension Project

Case No.: 2016-016100ENV
Project Title: Southern Skyline Boulevard Ridge Trail Extension Project

Some thoughts in response to the Public Notice dated March 30, 2017:

1. There are pros and cons to both Option 1 and Option 2. Option 1 is good because access will be supervised. Protection of our drinking water supply should always be paramount. There is always one member of the general public to spoil things for everyone else. If I understand the description correctly, however, local residents who have used the existing trail segment responsibly for generations would be denied access. Residents currently use the existing trail segment quite heavily and regularly, many walking their leashed dogs. It would be a blow to the community to lose this access. MidPeninsula Regional Open Space closed that type of access to their properties when they came into the area. Attempts to work with them to initiate a program that would have allowed residents to have leashed dogs on their trails were futile.

2. Option 2 would allow unrestricted access to the local community. It would be ideal if the general public were restricted and local residents given access. Unrestricted public access would also mean that an adequate number of rangers and maintenance personnel would need to be hired. Appropriate research would also need to be done to insure that adequate safety and emergency services would be available.

3. If the public is allowed unsupervised access to the trail, a parking lot for 20 cars will be inadequate. A quick look at the parking lots of MidPeninsula Regional Open Space along Skyline on weekends indicate a larger lot would be needed.

4. If I understand the letter correctly, a 50 car parking lot north of Highway 92 will be dangerous for pedestrians crossing the highway. I suggest researching resurrecting CalTrans' abandoned overpass project:

<http://www.dot.ca.gov/serp.html?q=highway+92&cx=001779225245372747843%3Auh1ozfcfcd&cof=FORID%3A10&ie=UTF-8&nojs=1>

(page 2 of search - highway 92)

1. purpose and need for project

File Format: Microsoft Word

Accident rates on the eastbound and westbound section of Route 92 within the project area are higher than the average for similar highway facilities. During the ...

www.dot.ca.gov/dist4/envirodocs/.../Update2000-92E.doc

5. I hope that measures will be taken to discourage the public from using the private property of the Kings Mountain Volunteer Fire Brigade at 133889 Skyline Blvd. for parking.

6. It will be beneficial to have regular forest maintenance to reduce the inherent fire hazard caused by traffic along Skyline Blvd.

Yours,
Carrie & Tim German
13080 Skyline Blvd.
Kings Mountain

Monday, April 24, 2017

Hello Chelsea & Yin,

It is with great concern that I contact you in regard to the Southern Skyline Boulevard Ridge Trail Extension Project. As a resident of this proposed area, I can tell you first hand that added traffic, be it vehicular, bicycle, or even pedestrian, cannot be supported.

Firstly, the roads here, including 92, which would be the access to this part of 35 are over saturated. Please access the CHP reports, and our own Kings Mountain Fire Brigade reports for the number of accidents in this area. 92 serves as a major bottle neck for commuters both on 35, and most of Halfmoon Bay. On the weekends, it gets even worse. Adding an attraction for more traffic and people will certainly up the death toll for traffic, spoil the lush natural environment, and ruin the area in every way. It would also cause a major security risk for the pristine drinking water reservoir, which effects and serves most of our local population.

Just last month we had a major, all out search with some 13 organizations on a man hunt for a missing hiker. Let us please learn from this, and realize that opening up any more trails, or attracting more people is horrible idea for this community, this environment, and its potential visitors.

Please keep me posted on this case.

Sincerely, Fred Johansen
Skyline Blvd, Woodside 94062
and
San Francisco, 94127

12.11 Revisions to Appendix C, Biological Resources

* Table BIO-1.1 on page C-4 is revised to include a new row below the fourth row (San Bruno Mountain manzanita), as follows:

Table BIO-1.1 Special-status Plant Species with Potential to Occur in the Project Area [Excerpt]

Common Name Scientific Name	Listing Status	Life Form	Flowering Period	Habitat Conditions	Potential to Occur
San Bruno Mountain manzanita <i>Arctostaphylos imbricata</i>	CE CRPR 1B.1	Shrub (evergreen)	Feb -- May	Chaparral, coastal scrub; sandstone outcrops. Elevation 900 to 1,200 feet.	Low ; known from only five occurrences on San Bruno Mountain.
<u>Anderson's manzanita</u> <u><i>Arctostaphylos andersonii</i></u>	<u>CRPR 1B.2</u>	<u>Shrub (evergreen)</u>	<u>Nov-May</u>	<u>Openings in broadleafed upland forest, chaparral, and North Coast coniferous forest. Elevation range: 200 to 2,500 ft.</u>	Moderate: <u>Habitat present on southern skyline ridge trail alignment. Recorded from Butano Ridge in redwood/Douglas-fir habitat.</u>

* Table BIO-1.2 on page C-15 is revised as follows:

Table Bio-1.2 Special-status Wildlife Species with Potential to Occur in the Project Area [Excerpt]

Common Name Scientific Name	Status	Habitat	Potential to Occur
MAMMALS			
American badger <i>Taxidea taxus</i>	CSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Moderate: One known <u>Known to</u> occur near the southern portion of the project area. Suitable open habitat is found elsewhere throughout the project area.
<u>Mountain lion</u> <u><i>Puma concolor</i></u>	<u>CE (candidate)</u>	<u>Found in mountains, hills, chaparral, forest and woodland habitats. Solitary, elusive, and highly territorial; primarily prey on deer, also other mammals. Dens among rocky outcrops, dense thickets and under uprooted trees</u>	High Potential (movement only): <u>Numerous sightings reported on the San Francisco Peninsula and near the Crystal Springs Reservoirs; watershed lands contain suitable habitat and abundant prey.</u>

* The text on page C-34 is revised to include a new subsection after the subsection *American Badger*, as follows:

MOUNTAIN LION

Status. The mountain lion (*Puma concolor*) is a California candidate endangered species.

General Ecology and Distribution. Mountain lions (also known as cougars) are widely distributed within California. They may be found in mountainous or chaparral areas, as well as hillsides, forest and woodlands. They primarily prey on mule deer, but also on other large mammals, such as hares or

coyotes. Mountain lions are highly territorial, solitary and elusive animals; they prefer to den in remote areas in dense vegetation, or underneath rocks or uprooted trees. Mountain lions do not hibernate; they are primarily active at night and around dawn and dusk. Home ranges may be as large as 50 to 150 miles in size; the species' candidate listing in California is primarily a result of inbreeding due to habitat loss and fragmentation. Mountain lions may mate year-round; the mother raises young, which may stay with her for up to two years.⁵³

Project Area Occurrence. CNDDDB has not tracked this species prior to its advancement to candidacy in April 2020.⁵⁴ The San Francisco Peninsula is known to be mountain lion habitat and numerous reports have observed mountain lions in the vicinity.⁵⁵ The watershed contains suitable wide-ranging undisturbed habitat for this species, which has high potential to intermittently occur in the project area.

⁵³ Center for Biological Diversity. 2019. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)

⁵⁴ California Fish & Game Commission, 2020. Press Release. <https://cdfgnews.wordpress.com/2020/04/16/california-fish-and-game-commission-meets-remotely/>

⁵⁵ Center for Biological Diversity. 2019. A Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)

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