

**ADDENDUM TO
MONTE CRESTA ROAD EXTENSION PROJECT
INITIAL STUDY
AND MITIGATED NEGATIVE DECLARATION**

Prepared for:

**City of Belmont
Public Works Department
One Twin Pine Lane
Belmont, CA 94002-3893
(650) 595-7416**

September 2005

Introduction

As required by section 15073 and 15105 of the California Environmental Quality Act (CEQA) Guidelines, the City of Belmont circulated the Draft Initial Study/Notice of Intent to Adopt the Mitigated Negative Declaration for the Monte Cresta Road Extension Project for a 30-day public review and comment period (from April 18, 2005 to May 18, 2005). The Initial Study, Notice of Intent, Mitigated Negative Declaration, and supporting documentation were made available by the City of Belmont Planning Division, One Twin Pine Lane, Belmont, and notices were distributed to neighbors and other interested parties.

The City of Belmont received 30 letters and emails commenting on the Initial Study and Notice of Intent during the public review period. These are listed below:

Address	Name
2824 Monte Cresta Drive	Keith & Margie Gorzell
2705 All View Way	George Fulvio
2719 All View Way	Annette Robinson
2711 Sequoia Way	Geri Crane
P.O. Box 557	Carol Rossi, President, San Juan Canyon Preservation Trust
2638 Sequoia Way	James P. Moran
2820 Monte Cresta Drive	Nancy Sato
2811 Monte Cresta Drive	Paul & Andrea Rosenfeld
2820 Alhambra Drive	Etta and Mark Herbach
Department of Fish & Game	Robert W. Floerke, Regional Manager, Central Coast Region
2633 Sequoia Way	Rosemary Aurbrey
State Clearinghouse	Terry Roberts, Director
2701 All View Way	Mr. & Mrs. Jim J. Carrasco
2712 All View Way	Pierre St. Hilaire & Louise Morin
2704 All View Way	Mitchell Baker & Casey Dunn
Cotton Shires & Associates	Ted Sayre & Patrick O. Shires
2638 Monserat Avenue	Alan Marx, MD
2803 Monte Cresta Drive	Juris Blukis
2309 Monserat Avenue	Max & Heidi Daehler
1902 Notre Dame Avenue	George Kranen
5 Monte Cresta Drive	Barry & Margaret Moore
2805 Monte Cresta Drive	Jim & Justine Eller
3250 Upper Lock Avenue	Jeff Marshall
2703 Sequoia Way	Linnaea Knisely
2712 All View Way	Pierre St-Hilaire & Louise Morin
900 Veterans Blvd., Ste. 600, Redwood City, CA 94063	Peter G. Riechert

2817 Monte Cresta Drive	Ted and Kim Moore
2519 Lincoln Avenue	Carol W. Hatfield
10 Winding Way, San Carlos	Damon Campbell
2532 Sequoia Way	Hartley Laughead

CEQA Guidelines section 15074(b) states that the decision-making body of the lead agency shall adopt a Mitigated Negative Declaration only if it finds, on the basis of the whole record before it, that there is no substantial evidence that the project would have a significant effect on the environment. This includes consideration of all public comments on the Draft Initial Study/Mitigated Negative Declaration. The Lead Agency (City of Belmont) may choose to revise the Draft Initial Study/Mitigated Negative declaration, however there is no specific requirement that the Lead Agency specifically respond to comments received.

The City of Belmont has elected to provide responses to substantive environmental comments on the Initial Study/Mitigated Negative Declaration. This document summarizes the comments by topic, and provides responses to each comment topic.

Comments and Responses

Background

The City has identified 15 separate CEQA-related issues raised by comments, primarily from project neighbors. These concerns are summarized below. Additionally, several of the received comments express opposition to the project, but did not cite specific environmental concerns. A chart of letters and comment topics is provided on the following page.

- Adequacy/Completeness of Project Description
- Adequacy of Assessment of Project-related Fire Hazards (including wildfires)
- Adequacy of Assessment of Geologic (in)Stability of the Site and Environs
- Adequacy of Biological Resources Assessment
- Mitigation Monitoring and Reporting Program/Mitigation Language
- Adequacy of Project Effects on Parks and Open Space
- Adequacy of Traffic and Parking Analysis
- Air Quality and Associated Health Risk Issues
- Noise Issues
- Adequacy of Sanitary Sewers
- Runoff and Storm Drainage Issues
- Visual and Aesthetic resource Concerns
- Adequacy of Initial Study Evaluation of Project Compliance with San Juan Hills Area Plan Policies
- Adequacy of CEQA Noticing
- Negative Declaration is Inappropriate; EIR is Required

Comments are addressed below by topic. Although several comments may have been received on various topics, this Addendum provides a single comprehensive response to comments on each of the 15 topics listed above.

Topic:	Project Description	Fire Hazards	Geologic Stability	Biological Resources	Mitigation/Monitoring	Parks/Open Space	Traffic	Air Quality/Health	Noise	Sewers	Runoff/Storm Drains	Visual/Aesthetics	SJHAP Policy Compliance	Inadequate Notice EIR Needed
Commenter														
Herbach		x	x	x	x	x	x			x			x	x
Rosenfeld														x
Rossi/SJCPT														
Crane/Wach			x	x			x			x				
Moran			x										x	
Sato							x	x		x				
Robinson												x		x
Gozell		x	x			x		x	x		x	x	x	x
Fulvio		x	x	x							x		x	
Campbell			x										x	
Laughead			x										x	
Hatfield		x	x	x							x			x
Moore		x						x			x		x	x
St-Hilaire			x											
Knisley			x								x		x	x
Eller		x	x	x						x	x		x	
Moore				x						x				x
Kranen													x	
Daehler			x										x	
Blukis		x	x								x		x	
Marx			x	x		x					x			
Cotton, Shires			x											
Baker	x	x				x			x	x		x		
Carrasco			x							x	x		x	x
State OPR														
CDFG				x										
Reichert			x										x	
Marshall	x	x	x	x	x	x	x				x		x	

Responses to Comments

Project Description

Public comments expressed concern that the project has been defined too narrowly to comply with CEQA. The comments questioned the IS/ND's calculation that three houses could be built on the properties that would be accessed by the roadway extension. Commenters counted four buildable lots. Commenters also stated that full buildout of the roadway from the Barclay Road side to the Alhambra Road side should be considered as part of cumulative development and stated that failure to do so was, in fact, the impermissible (under CEQA) piecemealing or segmentation of a larger extension of Monte Cresta Road, possibly connecting it through from Barclay Road to Alhambra Road.

While there were, at one time, four lots that would have been accessed by the proposed extension, two of those lots, former APN's 048-243-100 and 048-243-110, have since been merged into a single lot (APN 048-243-340), thereby reducing from four to three the number of houses that could be built on the properties accessed by the proposed roadway extension.

With respect to the cumulative projects/piecemealing comment, the project applicant seeks to develop a property adjacent to the proposed extension assessed in this document, and has no plans to extend the road further. Additionally, the City has received no applications, plans or proposals to further extend the roadway. Therefore, any further extension is not considered cumulative development under CEQA (which defines cumulative projects as past, approved, or reasonably foreseeable projects). The applicant did propose a longer (1,800-foot) extension in 2001-2002, but that proposal was abandoned in favor of the current project due to substantial geologic, biological resources/tree removal issues, and neighborhood opposition. This is discussed further in response to comments on compliance with the San Juan Hills Area Plan.

Fire Hazards

Fire hazard issues raised by commenters include questions regarding the projects contribution to and susceptibility to wildfires, the adequacy of fire truck access/turn-arounds, need for an additional fire hydrant, adequacy of roadway width, and adequacy of the South County Fire Authority's ability to fight grass fires. The Draft IS/ND noted that fire-safe measures associated with any new homes accessed by the roadway extension would be identified and required at the time of design review of those houses by the City and Fire Authority. In response to comments on the Draft IS/ND, the Fire Authority and has provided more detailed comments and recommendations on the roadway extension itself. The Fire Authority has determined that the proposed roadway extension meets the requirement of California Fire Code Section 902 requirements. The Fire Marshal does not foresee problems with truck access and turn-arounds. (James Palisi, Fire Marshal, South County Fire Authority, email communication, June 15, 2005). The Fire Authority requires a 20-foot roadway width; the project provides a 48-foot total

width, and, with one parking lane would still have an available width of 36 feet or more for truck access and turn-arounds.

The Authority considers fire access on the proposed roadway extension to be adequate provided the following conditions are met. These conditions are added as mitigation measures to the IS and MMRP:

Mitigation VII-1: The project shall comply with the following requirements of the South County Fire Authority:

- a) The roadway width must be at least 20 feet, it must be clear and unobstructed, with an all-weather surface capable of supporting 60,000 lbs, and have outside turning radius of 51 feet.
- b) A fire hydrant at the end of the roadway shall be added to project plans prior to project approval. Fire flow calculations shall be submitted to the South County Fire Authority along with final project plans showing that water pressure and flows will meet the Authority's minimum standards.
- c) No-parking signage, and red-curbs on one side of the roadway.
- d) A vegetation management plan shall be prepared for the project that stipulates clearing all vegetation to at least 10' from each curb. This plan shall be submitted to the South Bay Fire Authority prior to issuance of roadway construction permits

According to the Fire Marshal, although the site is in a designated urban/wildland interface, no additional requirements from the urban/wildland interface criteria applicable at this level of project review (road extension). (James Palisi, Fire Marshal, South County Fire Authority, email communication, June 15, 2005).

Geologic Stability Issues

Commenters expressed concern regarding the adequacy of the geotechnical investigations, their timing, and the failure of the studies to adequately address the instability of the surrounding hillsides. Commenters also stated that engineering and construction information is insufficient to evaluate the cost and risk of crossing Pdf (potential debris flow) areas, and that seismic and landslide risks have not been adequately evaluated.

Project geotechnical issues have been studied in detail and the studies are summarized on pp. 17-21 of the IS/ND. The IS/ND geologic hazards discussion was further reviewed by Cotton Shires Associates, the City's geologic consultants, who submitted a comment letter on this document. These issues appear to be adequately addressed by prior geologic analyses as well as the most recent Cotton Shires submittal. The Cotton Shires report states that the proposed roadway alignment stops approximately 30 feet

short of a 20-foot wide shallow landslide, which is consistent with the Pdf area shown on the San Juan Hills Ground Movement Potential Map and indicated as a shaded area on Figure 2 in the IS/ND. Cotton Shires states that “the remainder of the proposed roadway is located on a mapped Ps zone indicating the potential for shallow slope instability.” They concluded that “With respect to environmental impacts, we concur with the Initial Study that the proposed project (with listed mitigation measures) should not expose people or structures to potential adverse impacts from fault rupture, ground shaking, seismic ground failure, landslides, expansive soil or erosion.” Cotton Shires reiterated their recommendations for a supplemental geotechnical investigation prior to issuance of any permits for project construction, and for review of all geotechnical aspects of project building and grading plans by the applicant’s geotechnical consultants. These recommendations are consistent with Mitigation IV-1 in the IS/ND, and would be included as conditions of project approval.

The applicant also commented that certain statements in the IS/ND inaccurately characterize site geologic hazards. On p. 18, the last line has been corrected to read:

“...findings that a ~~two~~-potential debris flow areas exists ~~on or near~~ 30 feet north west of the proposed roadway..” [text changes in italics/strike-through].

Biological Resources

A comment mentions an inconsistency regarding our evaluation of the potential for occurrence of the federally listed subspecies Mission Blue butterfly. The comment is correct. There is a misstatement in the first paragraph under the heading “Mission Blue Butterfly” on line 4, page 10 of the Biological Resources Assessment (IS/ND Appendix A). That sentence is revised to read, “the subspecies is considered to have a low potential to occur within the study area.” Our determination that the butterfly has a low potential to occur on site is repeated in the summary (page ii, last paragraph); in paragraph 2, page 11; and Appendix B, page 1. No revisions are required to the IS/ND text.

Comments also expressed concern that the IS mitigation measures improperly defer certain biological resources studies to pre-construction surveys, particularly with respect to the mission blue butterfly. As discussed in the biological assessment report appended to the Initial Study (Wood 2004), suitable larval host plants for the federally listed endangered subspecies mission blue butterfly (*Icaricia icarioides misionensis*) are present within the study area. Silver lupines were detected just down slope of the proposed driveway on parcel # 043-161-170 and in the northwestern corner of parcel # 043-243-340. This does not mean that the mission blue butterfly is present on site. Rather, due to the presence of these host plants, its presence cannot be ruled out at this time. The IS considers the potential for occurrence of mission blue butterfly on site to be low due to the remote location of the project site from documented populations elsewhere in San Mateo County.

The silver lupine impact issue is addressed in detail in an additional letter report from Wood Biological Consulting (included as Attachment A to this Addendum). As

described in that report, the specific host plants, silver bush lupine (*Lupinus albifrons*), exist in four clusters. When overlaid on the proposed revised road section plans (dated 2/26/05), it does not appear as though any of the silver bush lupine clusters would be directly affected by the roadway, but could be impacted by future house construction.

To ensure that the silver bush lupines are not accidentally impacted during grading and road construction, the following mitigation measure is added to the IS and MMRP:

Mitigation Measure IV.3A: Silver lupine plants identified in the vicinity of the proposed roadway extension shall be protected by installation of orange construction fencing around the plants. The grading contractor shall be informed of the potential presence of an endangered species and made aware of the implications of violating the Endangered Species Act. If the lupines are accidentally impacted by the contractor, the contractor shall be responsible for implementing any mitigation measures the USFWS determines are warranted.

As outlined in the Initial Study, if proposed grading (i.e. for future houses) would impact silver bush lupines, further study relevant to mission blue butterfly, as specified in the IS Mitigation Measure IV.3, would be warranted. That measure has been revised to specify that it is warranted only under those conditions. Specifically, as described in Mitigation IV-3, presence/absence surveys should be conducted during the flight season for the butterfly, which extends from March through the end of June. At least three site visits should be made by a qualified entomologist, during which larval host plants should be inspected for adults butterflies, eggs, larvae and evidence of larval feeding damage. If presence of mission blue butterfly were confirmed, consultation with the U.S. Fish and Wildlife Service (USFWS) would be required before grading could proceed. Specific mitigation measures would need to be developed in consultation with the USFWS. Unauthorized "take" of mission blue butterfly adults, larvae or eggs would constitute a violation of the federal Endangered Species Act.

Commenters also have requested that the biological study area be expanded to include the entire canyon. The IS biologist stands by his characterization of the habitats occurring within the study area. The as described above under the Project Description comment discussion, the project does not include a longer roadway, and, therefore, would not affect areas of the San Juan Canyon beyond those studied in this IS/ND's biological survey.

Comments also question the IS's treatment of Coastal Oak Woodlands habitat and stated that portions of the site should be considered Coastal Oak Woodlands and viewed in a larger context. While the IS biologist agrees with the comment's sense of the importance of California's diminishing oak woodlands, it is worth pointing out that coast live oak forests and woodlands do not have legally protected status at the state level. With the exception of coast live oak-black oak woodland and southern coast live oak riparian forest, the 25 coast live oak plant community types are not denoted as communities that "are either known or believed to be of high priority for inventory in CNDDDB" (CDFG 2003). The IS defines "special-status natural communities" in Section 4.1 of the Biological Assessment. Impacts to other natural communities, that is, those not defined

as having special-status, are not considered significant under CEQA guidelines, are not required to be address in CEQA documents, and do not require mitigation.

The commenter cites the Oak Woodland Conservation Act of 2001. In recognizing the importance of oak woodlands and the critical role private landowners have in the conservation of oaks, the legislative intent of this act is to:

1. Support and encourage voluntary, long-term private stewardship and conservation of California oak woodlands by offering landowners financial incentives to protect and promote biologically functional oak woodlands;
2. Provide incentives to protect and encourage farming and ranching operations that are operated in a manner that protect and promote healthy oak woodlands;
3. Provide incentives for the protection of oak trees providing superior wildlife values on private land, and;
4. Encourage planning that is consistent with oak woodlands preservation.

The comment also cites the California Oak Woodlands Law of 2005. This law provides oak woodland conservation standards for the CEQA processes. It only applies to CEQA processes within a county's jurisdiction; other public agencies (such as cities) are still subject to the general guidelines of CEQA. Under this law, CEQA mitigation standards apply only to oaks with a diameter of 5 inches or more. The law outlines four mitigation alternatives available to proportionally mitigate significant impacts to oak woodlands habitat. These include:

1. Conserve oak woodlands, through the use of conservation easements;
2. Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
3. Contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of Section 1363 of the Fish and Game Code, for the purpose of purchasing oak woodlands conservation easements.
4. Other mitigation measures developed by the county.

The legislation cited in the comments would not affect this project, do not alter the IS/ND's analysis, and does not change the recommended mitigation measures. The Belmont Tree Ordinance conforms essentially to the recommended mitigation measures of the California Oak Woodlands Law. However, as discussed above, that law does not apply to CEQA processes where a City is the lead agency.

Mitigation Monitoring/Mitigation Language

Comments asked about the lack of a Mitigation Monitoring and Reporting Program (MMRP) and requested more definitive language (shall vs. should) in the mitigations. Under CEQA, a MMRP is required at the time of project approval, but not prior to that

time. The MMRPP is included in the Final IS. Mitigation measure wording has been revised to include enforceable terms such as shall and will. The revised mitigation wording has been incorporated into the MMRP and will be incorporated into the City's Conditions of Approval for the project should the project be approved.

Parks/Open Space

Commenters generally expressed concern on project impacts to open space, expressed concern that this was part of an incremental loss of open space, and commented that the additional houses would worsen existing per-capita park acreage deficiencies. The roadway itself would result in minimal loss of open space, and would not create any additional demand on City or regional parks. The roadway would be public and the public could still access open space from the end of the roadway. The development of up to three houses would slightly reduce the appearance of open space in the area, however that land is privately owned and zoned residential, and is not public park or open space land. Therefore its potential development, while being a visual impact, is not considered an impact to park land.

The Director of City's Parks and Recreation was contacted to address the issue of deficiency of park space in the San Juan Hills area as called out in the 1988 San Juan Hills Area Plan (Karl Mittelstadt, Director of Parks and Recreation Department, telephone conversation, June 17, 2005). Since 1988, an additional one-acre park, Ralston Ranch Park, has been added in the San Juan Hills Area. This reduced the park acreage-per-capita deficiencies cited in the comment. It is not known whether there are still parks deficiencies in the San Juan Hills Area. The Director concurs with the statement in the Draft IS/ND (p. 31), that the development of three houses would add minimally to the City's park demand, and would not result in a significant impact on local parks.

Traffic

Several comments were received on traffic access and safety. As described in the IS, buildout of up to three house would add up to 30 trips/day, or less than 6 trips in the peak traffic hour, to the roadways accessing the site. The City's Public Works Department does not consider this level of increased traffic to have any potential to adversely affect traffic on Ralston Avenue, Cipriani Boulevard, or San Juan Boulevard (Gilbert Yau, personal communication). The prohibition of parking on one side of the extended roadway (for fire access) has been added to assure adequate fire engine access (See new Mitigation VII-1, above). Adequacy of parking in association with any new houses accessed from the proposed extension would be evaluated and conditions in the design review of those houses.

Air Quality/Health

Commenters address potential health and other impacts associated with dust, wind, and micro-climates. As described on p. 11 of the draft IS, dust and other particulates could be generated from the site during grading and construction of the roadway. Measures 1-10 on pp. 11-12 of that document would be required by the City as conditions of

project approval. To assure implementation of these measures, they have been included in the Mitigation Monitoring and Reporting Program for the project. Emissions from construction vehicles and daily trips from possible houses accessed by the roadway would be far below the Bay Area Air Quality Management District's screening criteria (80 lbs/day for most criteria pollutants). Therefore, project traffic would not have a significant air quality impact.

Noise

Commenters address noise associated with wind and micro-climates. As described on p. 29 of the draft IS, noise would be generated during project construction. Project traffic would generate small amounts of traffic noise. While winds could carry noise some distance from construction activities, topography also plays a substantial role in noise transmission; given the site topography, construction noise could be audible at residences across the canyon. However, as described on p. 21 of the draft IS, the City's Noise Ordinance places strict limits on construction noise. Those limits would eliminate any nighttime noise, and otherwise limit construction noise. Therefore, this impact is considered less than significant.

Sanitary Sewers

A number of commenters expressed concern that sanitary sewers accessing the project site are problematic and may be of insufficient capacity. Evidence provided seems to indicate that sewer problems in the area have been due primarily to roots clogging the pipes. However a sewer capacity evaluation has been prepared by the Applicant's engineer. That study determined that the sanitary sewer lines serving the project area are running at 70% of capacity or less. The addition of up to three houses would increase this to no more than 80%, indicating adequate sewer capacity. Sanitary sewer demand calculations are included as Attachment B to this Addendum.

Runoff/Storm Drainage

The adequacy of local storm drainage facilities and the project's plan to control runoff has been questioned. The applicant has proposed to retain all project-generated increases in stormwater from the project site in the 10-year/1-hour design rainfall event. This retained water will then be released into the gutter and enter the City's stormwater system after the peak flows have passed. This stormwater detention design standard will be a condition of approval of the project.

Visual/Aesthetics

Several commenters express concern on the project's visual impacts, specifically from Ralston Avenue and Belmont Canyon Road. Project visual impacts are described on pp. 7-10 of the draft IS. That discussion notes that the project "would be visible in the background in views from houses located across the canyon to the west of the site". Those views include views from Belmont Canyon Road. It is unlikely that the site could be seen in any views from Ralston Avenue.

SJHAP Policy Compliance

A number of commenters express concern that the project would not comply with San Juan Hills Area Plan (SJHAP) Infrastructure Policy 10, which imposes limits and conditions on roadway extensions in the Plan area. Comments also cite a 1988 comment from the then Community Development Director that Policy 10 would permanently end incremental development of unimproved roads in the San Juan Hills area. Comments also stated that the project would conflict with Section 7-13 of the Belmont Municipal Code, which implements Policy 10 and specifies requirements for plans for unimproved road segments between existing paved roads and areas off physical constraints that preclude further roadway extension.

Project compliance with SJHAP Policy 10 and Municipal Code Section 7-13 is discussed on p. 27 of the draft IS. City Planning Department staff have reviewed this discussion and concur that it is correct as written. Section 10(b) specifies five components to a plan for extending a roadway between an existing paved road and an area where physical constraints make further road extensions infeasible or undesirable. The project's compliance with the six components are summarized below:

1) *Design for physical improvements to provide safe, all weather access prior to building construction.*

The project plan evaluated in this IS/ND complies with this plan requirement.

2) *Demonstration that the road section will be geologically safe.*

See discussion under Geologic Stability Issues, above. As described therein, the project geotechnical consultants and the City's geologist concur that the project, as designed and evaluated in the IS, would be geologically safe.

3) *A method and timetable for financing the road improvements.*

The applicant proposes to fund the roadway improvements. The timetable for those improvements is described on p. 2 of the IS/ND.

4) *A method for financing and maintenance of the road if the road is to be private.*

The road is proposed to be public, so this condition does not apply (except that City staff reserves the right to review the permit).

5) *A plan for the access for the properties located along the rest of the roadway which will not be served by the proposed extension.*

In 2002 the applicant submitted a plan to the City for a potential roadway extension (1,800 feet) that service all of the parcels along Monte Cresta, including

those beyond the currently proposed extension. The City considers that plan adequate to meet this requirement.

6) *Evidence of participation and support by the affected landowners.*

The applicant has submitted letters of support and/or participation to the City from the landowners adjacent to the proposed extension. These are on file at the City.

Municipal Code Section 7-13 also requires a report by a licensed geotechnical engineer concluding that a stable road cannot be reasonably constructed through to a paved road. As described on p. 27 of the draft IS, such a report has been submitted by the applicant's geologist.

CEQA Noticing Issues and EIR Requests

Comments on CEQA issues focused on two areas; 1) whether adequate noticing was provided for the Initial Study, and 2) whether an EIR is required. Comments also referenced cumulative impacts and piecemealing issues (discussed above under Project Description) as additional reasons why the IS is inadequate and an EIR should be prepared.

We concur with comments stating that CEQA requires a lead agency to prepare an EIR if the agency determines that there is substantial evidence in light of the whole record that a project, either cumulatively or individually, may have a significant effect on the environment. However, as detailed in the Initial Study and described above, the proposed project either would not cause a significant effect, or it would cause such an effect but mitigation measures have been incorporated in the IS that would clearly reduce these impacts to a less-than-significant level. Therefore, staff and the CEQA consultant have found that an Environmental Impact report is not triggered by the project. It should be noted that the ultimate decision on whether this IS is sufficient to comply with CEQA is up to the Planning Commission and City Council.

Commenters requesting noticing of further City actions on this project will be added to the City's list of people to be notified.

Attachment A: Wood Biological Consulting Letter



WOOD BIOLOGICAL CONSULTING

65 Alta Hill Way
Walnut Creek, CA 94595
Tel: (925) 899-1282
Fax: (925) 939-4026
e-mail: wood-biological@mindspring.com

June 17, 2005

Richard Grasseti
Grasseti Environmental Consulting
7008 Bristol Drive
Berkeley, CA 94705

RE: Monte Cresta Drive, Belmont

Dear Richard:

As discussed in our biological assessment report (Wood 2004), suitable larval host plants for the federally listed endangered subspecies mission blue butterfly (*Icaricia icarioides misionensis*) are present within the study area. This does not mean that the mission blue butterfly is present on site. Rather, due to the presence of these host plants, its presence cannot be ruled out at this time. We consider the potential for occurrence of mission blue butterfly on site to be low due to the remote location of the project site from documented populations elsewhere in San Mateo County.

The specific host plants, silver bush lupine (*Lupinus albifrons*), exist in four clusters, as shown on the attached map. When overlaid on the proposed revised road section plans (dated 2/26/05), it does not appear as though any of the silver bush lupine clusters would be directly affected.

As outlined in the biological assessment, if proposed grading would impact silver bush lupines, further study relevant to mission blue butterfly would be warranted. Specifically, presence/absence surveys should be conducted during the flight season for the butterfly, which extends from March through the end of June. At least three site visits should be made by a qualified entomologist, during

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which larval host plants should be inspected for adults butterflies, eggs, larvae and evidence of larval feeding damage. If presence of mission blue butterfly were confirmed, consultation with the

U.S. Fish and Wildlife Service (USFWS) would be required before grading could proceed. Specific mitigation measures would need to be developed in consultation with the USFWS. Unauthorized "take" of mission blue butterfly adults, larvae or eggs would constitute a violation of the federal Endangered Species Act.

To ensure that the silver bush lupines are not accidentally impacted during grading and road construction, the plants shall be protected by installation of orange construction fencing. The contractor shall be informed of the potential presence of an endangered species and made aware of the implications of violating the Endangered Species Act. If the lupines are accidentally impacted by the contractor, the contractor shall be responsible for implementing whatever mitigation measures the USFWS determines are warranted.

If you have any questions, please don't hesitate to contact me.

Sincerely,

Michael Wood

Enclosures: map of locations of silver bush lupine stands

Literature Cited

Wood Biological Consulting. 2004. *Biological Assessment for the Proposed Monte Cresta Drive Road Improvement Project Site, Belmont, San Mateo County, California*. Unpublished technical report prepared for Grasseti Environmental Consulting, Berkeley. October 14.

Attachment B: Sewer Capacity Calculations