

County of San Mateo
Quarry County Park Wildfire Reduction and Visitor Services Project
Response to Comments
State Clearinghouse #2022110124

1. INTRODUCTION

It is the intent of the California Environmental Quality Act (CEQA) to solicit information from agencies and the public about a project's environmental effects and, in doing so, to avoid or reduce impacts of the project. This memorandum addresses the public review process for the Mitigated Negative Declaration (MND) or the Quarry County Park Wildfire Reduction and Visitor Services Project (Project) by providing written responses to public comments received on the MND.

Section 15074 (b) of the CEQA Guidelines states:

“Prior to approving a project, the decision-making body of the lead agency shall consider the proposed mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the mitigated negative declaration reflects the lead agency’s independent judgment and analysis.”

This memorandum provides written responses to public comments received on the ISMND, clarifying and supplemental information, and revisions to the Draft Initial Study text, and is part of the record of proceedings upon which the County of San Mateo (County) will base its decision when considering adoption of the MND and approval of the Project.

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines section 15073.5, a lead agency may revise an Initial Study and not have to recirculate the document for public review under the following circumstances:

- (1) Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.
- (2) New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.
- (3) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
- (4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The public comment received, response to comments, and text revisions presented in this Response to Comments document do not constitute significant new information regarding the project description, environmental and regulatory setting, conclusions of the environmental

analysis, or in the mitigation measures or requirements incorporated into the project to mitigate impacts, or otherwise provide significant new information that would require recirculation of the Public Review Initial Study pursuant to CEQA Guidelines section 15073.5.

2. PUBLIC COMMENT AND RESPONSES

The County prepared an Initial Study and Draft Mitigated Negative Declaration (IS/MND) for the Quarry County Park Wildfire Fuel Reduction and Visitor Serving Projects and circulated it for a 30-day public review from November 9, 2022 to December 9, 2022. The Draft IS/MND was posted on the County's website, filed with the State Clearinghouse CEQANet web portal (SCH#2022110124) and posted in the Half Moon Bay Review. Notices were also mailed to property owners and occupants within 300 feet of the site and emailed to members of the public, organizations, and entities who had requested notices about the Project.

The County received comment from one public agency. No comment was received from organizations or residents. The agency comment letter received is from the California Coastal Commission. The comment letter is included as Attachment 1. The comments are addressed below.

Comment Letter: California Coastal Commission

Comment 1: *Unavoidable Impacts.* ... *Commission staff understands the need for flexibility in managing vegetation given the unpredictability of the many factors that contribute to wildfire risk, however additional unavoidable impacts must be quantified and mitigated for. Please quantify all currently known unavoidable impacts and describe the appropriate mitigation actions for such impacts. Please keep in mind that any additional impacts not quantified currently will need additional authorization via a coastal development permit or other appropriate process.*

Response to Comment 1: As noted in the comment and described in the Initial Study (pp. 2-7), the proposed project would expand the fuel management program occurring at Quarry County Park from the defined buffer distances set in the County's Routine Maintenance Program (RMP) to areas throughout the park as shown in Initial Study Figure 5. Relevant Best Management Practices (BMPs) prescribed in the Routine Maintenance Program would be applied to the project activities as specified and identified in the Initial Study. Additional mitigation measures as outlined in the ISMND would be implemented to address potential environmental impacts. All known potentially significant environmental impacts have been identified in the Initial Study and mitigated to a less-than-significant impact. There are no unavoidable significant impacts. The commenter does not identify specific impacts of concern. Potential unavoidable impacts to biotic habitats are quantified in the Initial Study biology discussion (see Table 3) and are not significant. Impacts to specific special-status plant or wildlife species cannot be quantified as presence is unknown and would be identified and protected prior to construction activities as required by project mitigation (see Mitigation Measure BLGY-1 through BLGY-6). Unavoidable soil disturbance from fire road construction is quantified in the Initial Study hydrology discussion and mitigated through implementation of a Stormwater Pollution Prevention Plan (see Mitigation Measure HYD-1) and implementation of BMPs prescribed in the Routine Maintenance Program.

Comment 2: *Road Access.* *The report states that temporary access roads would be established to move equipment into the treatment areas and that vegetation would be removed to the minimum amount necessary to provide access. The temporary access roads would be decommissioned and restored upon completion of vegetation treatment activity. Please provide the proposed restoration plan for when the temporary access roads are decommissioned.*

South Ridge Fire Road is proposed to complete a loop through Quarry County Park to provide first responders access to the park in case of a wildfire. The fire road would be constructed from Coronado Avenue at the southeast corner of the park and connect to the existing South Ridge Trail. It seems there are multiple roads within the park that connect to urban/residential roads such as Santa Maria Avenue and El Granada Boulevard. Please discuss any alternatives that were considered in order to select the least environmentally damaging alternative.

Response to Comment 2: As noted in the comment and described in the Initial Study (p.5 and p. 8, Table 2), temporary access roads would be established to move equipment into the treatment area. Roads would be decommissioned as discussed in Quarry Park Master Plan Appendix B, Watershed Assessment and Erosion Prevention Plan (see <https://www.smcgov.org/media/133306/download?inline=>). Road decommissioning would involve restoring the road grade back to a pre-existing topographic contour, installing erosion and sediment controls as specified by Routine Maintenance Program BMPs (see Initial Study Attachment A), and installing barriers or visually disguising trails at road entrances to prevent public access and ongoing use. This Initial Study (p. 6) discussion of decommissioning temporary access roads is revised to include this additional information on decommissioning activities to provide clarity. See Initial Study Text Revisions below.

As noted in the comment, trails within the park connect to Santa Maria Avenue, El Granada Boulevard, and Coronado Avenue). The proposed South Ridge Fire Road alignment connecting Coronado Avenue to the South Ridge Trail was selected by Cal Fire to close a gap in fire access coverage within the park. The southern end of Quarry County Park does not have roads with sufficient grades or widths that support emergency vehicles. Designing the route alignment involved multiple factors including achieving the correct road grade and width required for fire protection equipment, avoidance of geologically unstable areas, and avoidance of biologically sensitive areas such as creeks and drainages. Alignments from Santa Maria or El Granada Boulevard were not considered by Cal Fire as these routes would not achieve design objectives for emergency vehicles.

Comment 3: Stream Crossings. *Table 3 indicates that there will be no impacts to ephemeral, intermittent and perennial streams found on the project site resulting from the construction of the South Ridge Fire Road. However, Figure 7 shows that South Ridge Fire Road will cross ephemeral and intermittent streams at several locations. Please indicate what the associated impacts will be and what mitigation measures will be implemented to assure impacts to these resources will be avoided and lessened where possible, and mitigated for where avoidance is not possible.*

Response to Comment 3: As shown Initial Study Figure 6 (renumbered to Figure 7; see Attachment 2), the South Ridge Fire Road is located above a class III stream (intermittent) but does not cross the stream in any location. Initial Study Figure 7 (renumbered to Figure 8; see Attachment 2) shows ephemeral and intermittent streams to the west of the South Ridge Fire Road alignment. The lines shown crossing the fire road are foot trails or legacy roads (see Figure 8 legend). The map color used for the ephemeral streams has been revised to provide better visual distinction from the foot trails. As shown in Figure 8, the South Ridge Fire Road would not cross ephemeral, intermittent, or perennial streams.

3. INITIAL STUDY TEXT REVISIONS

This section includes changes to the Draft IS/MND needed to respond to comments, correct inaccuracies, and clarify information provided in the Draft IS/MND. Text removed from the IS/MND is marked with ~~strike-out~~. New text is indicated by underline.

Page 6, first sentence top of page

Roads would be decommissioned and restored upon completion of vegetation treatment activity. Roads would be decommissioned as discussed in Quarry Park Master Plan Appendix B, Watershed Assessment and Erosion Prevention Plan. Road decommissioning would involve restoring the road grade back to a pre-existing topographic contour, installing erosion and sediment controls as specified by Routine Maintenance Program BMPs (see Initial Study Attachment A), and installing barriers or visually disguising trails at road entrances to prevent public access and ongoing use.

Pages 10-12, Figures 4 through 7

Figures 4 through 7 are renumbered as Figures 5 through 8. Corrected Figures are presented in Attachment 2

Page 42, Discussion 4c, second paragraph

The Project site contains non-wetland waters including ephemeral, intermittent, and perennial streams and perennial ponds (Figure 7~~8~~) that are potentially subject to regulation by the USACE, RWQCB, California Department of Fish and Wildlife (CDFW), and CCC.

Attachment 1: California Coastal Commission Comment Letter

From: Martinez, Erik@Coastal <erik.martinez@coastal.ca.gov>
Sent: Friday, December 9, 2022 11:54 AM
To: Samuel Herzberg
Cc: KoppmanNorton, Julia@Coastal; Rexing, Stephanie@Coastal; Camille Leung
Subject: PLN 2022-00125 Quarry Park Wildfire Reduction Project CCC Comments

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Hi Sam,

Thank you for the opportunity to comment on the initial environmental evaluation for the Quarry County Park Wildfire Reduction and Visitor Serving Projects. Commission staff has reviewed and has the following comments:

1. **Unavoidable Impacts.** The report states that per the recommendations and actions for managing wildfire threat in Quarry County Park through the Quarry County Park Master Plan (2022) and the Department's Wildfire Fuel Management Program (2021), SMCPD proposes expanding the scope of fuel reduction into the areas beyond currently managed service road, trail, and park boundary corridors to other areas outside of these defined buffer distances set in the County's RMP. It also states that non-shaded and shaded fuel breaks could also be implemented throughout the park **as needed or appropriate** outside of the 100-foot buffer currently implemented by County Parks through the RMP and proposes addressing hazard tree removal beyond the current 200 feet perimeter of park facilities, roads, trails, or boundaries as needed in order to increase the safety of access and reduce fire risk posed by dead or decaying trees. Commission staff understands the need for flexibility in managing vegetation given the unpredictability of the many factors that contribute to wildfire risk, however additional unavoidable impacts must be quantified and mitigated for. Please quantify all currently known unavoidable impacts and describe the appropriate mitigation actions for such impacts. Please keep in mind that any additional impacts not quantified currently will need additional authorization via a coastal development permit or other appropriate process.
2. **Road Access.** The report states that temporary access roads would be established to move equipment into the treatment areas and that vegetation would be removed to the minimum amount necessary to provide access. The temporary access roads would be decommissioned and restored upon completion of vegetation treatment activity. Please provide the proposed restoration plan for when the temporary access roads are decommissioned.

South Ridge Fire Road is proposed to complete a loop through Quarry County Park to provide first responders access to the park in case of a wildfire. The fire road would be constructed from Coronado Avenue at the southeast corner of the park and connect to the existing South Ridge Trail. It seems there are multiple roads within the park

that connect to urban/residential roads such as Santa Maria Avenue and El Granada Boulevard. Please discuss any alternatives that were considered in order to select the least environmentally damaging alternative.

3. **Stream Crossings.** Table 3 indicates that there will be no impacts to ephemeral, intermittent and perennial streams found on the project site resulting from the construction of the South Ridge Fire Road. However, Figure 7 shows that South Ridge Fire Road will cross ephemeral and intermittent streams at several locations. Please indicate what the associated impacts will be and what mitigation measures will be implemented to assure impacts to these resources will be avoided and lessened where possible, and mitigated for where avoidance is not possible.

Best,

Erik Martinez

Coastal Planner

California Coastal Commission



Quarry County Park Vegetation Treatment Areas for Fuel Reduction

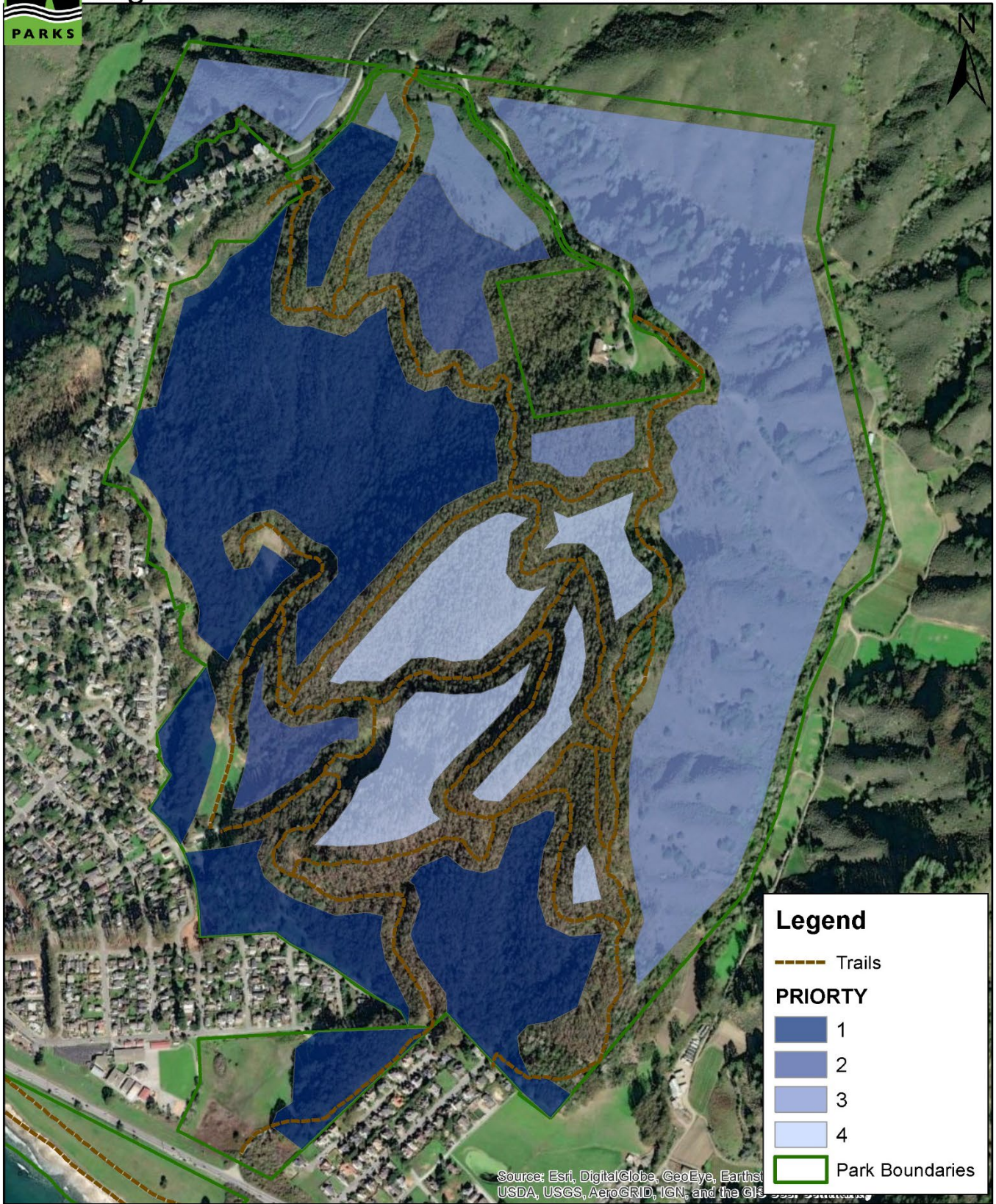


Figure 5 Fuel Reduction Areas

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Photo 1. Example of park vegetation requiring fuel reduction to reduce wildfire hazard prior to treatment. Large diameter hazard trees are tagged with orange paint for removal.



Photo 2. Example of a shaded fuel break with thinned trees and understory brush removed.

Figure 6 Site Photos

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Photo 3. Example of fuel break area prior to treatment.



Photo 4. Fuel break area after treatment with thinned trees and understory brush removed.

Figure 6 Site Photos

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Photo 5. Example of a hazard tree prior to removal.



Photo 6. Example of area after with hazard tree after removal.

Figure 6 Site Photos

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Photo 7. View of fuel reduction area along western park boundary looking north.



Photo 8. View of fuel reduction area along western park boundary looking northwest toward homes along El Granada Boulevard.

Figure 6 Site Photos

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Photo 9. View of proposed South Ridge Fire Road alignment looking southwest toward Coronado Road.



Photo 10a. Location of proposed vault toilet adjacent to (left of) the pump track area.



Photo 10b. Single-vault toilet near park entrance. Example of structure to be installed near pump track

Figure 6 Site Photos

Quarry County Park Wildfire Reduction and Visitor Serving Projects



Source: Google Earth 9/27/2021; WRA 2022

Sensitive Communities

- Ephemeral Stream (10,172 linear ft, .11 acres)
- Intermittent Stream (10,144 linear ft, .38 acres)
- Perennial Stream (264 linear ft, .03 acres)
- Central Coast Arroyo Willow Riparian Scrub (23.3 acres)
- Perennial Pond (1.35 acres)
- Seasonal Pond (.044 acres)
- Seasonal Wetland (3.97 acres)

- Study Area
- Park Trails/Access Roads
- ESHA Buffers

Non-Sensitive Communities

- Developed/ Disturbed (19.3 acres)
- Eucalyptus Woodland (307 acres)
- Monterey Pine Stand (3.32 acres)
- Non-native Annual Grassland (36.8 acres)
- Northern Coastal Scrub (126 acres)

Project Impacts

- Vault Toilet
- South Ridge Fire Road
- Fuel Reduction Areas Effectiveness
 - Highest
 - High
 - Moderate
 - Lower
- Foot Trails/Quarry Legacy Roads (Future Temporary Access Road)

Figure 8 Biotic Habitats and Project Impact Areas

Quarry Park Wildfire Reduction & Visitor Serving CEQA