City Council Agenda Item
Staff Report

CITY OF SAN BRUNO

DATE: September 24, 2019

TO: Honorable Mayor and Members of the City Council

FROM: Jovan D. Grogan, City Manager

PREPARED BY: Joanne Magrini, Community Services Director

SUBJECT: Authorize Modifications to the Florida Avenue Park Master Plan

EXECUTIVE SUMMARY:

In September 2018, City staff posted notices for removal on two heritage trees located at the Florida Avenue Park site. Within the 10-day notice period, three appeals of the removal were received. This report details the results of the appeal process and the settlement terms that were reached by the City of San Bruno and the appellants. Through this report, staff requests that the City Council authorize modifications to the Florida Avenue Park Master Plan, with the plan that staff will return to Council with final design drawings and cost estimates, which are projected to take two to three months.

BACKGROUND:

On October 28, 2014, the City Council adopted Resolution 2014-108 authorizing the City Manager and City Attorney to complete the purchase of 324 Florida Avenue for future use as a neighborhood park using $600,000 from the City's Park In-Lieu Fund. The property consists of eight parcels (approximately ½ acre in total land area) located in a relatively dense residential neighborhood. At the time of acquisition, the property included four buildings: the main residence, a duplex, a garage and a workshop. A large adjacent yard was primarily undeveloped with various types of trees and other vegetation including two heritage trees (exceeding 30" in diameter). The condition of the property had fallen into disrepair due to lack of upkeep and vandalism, and had become a public nuisance.

On May 24, 2016, the City Council authorized a contract for remediation of the site, which included the demolition of the buildings on site, proper removal and disposal of contaminated soil and asbestos associated with the property, grading, temporary security of the site with fencing, and salvage of a hand-carved solid mahogany wooden tableau found in the workshop.

Concurrently with the demolition and remediation of the property, an extensive community engagement process was conducted with the residents surrounding the future park site. The neighborhood was invited to attend meetings to provide input on their preferred design and amenities for their future park. At the first meeting in June 2016, residents were asked to articulate their vision for the park and share concerns regarding neighborhood impacts, safety, and maintenance. Residents were also asked their preferences regarding placement of various park elements such as play areas and features for young children, teens and adults, social and

gathering areas, spaces for solitude and quiet contemplation, and open space and natural elements. Following the first neighborhood meeting, a single concept plan was developed for the proposed park.

The second neighborhood meeting was held in August 2016, at which time the concept plan was introduced to the public. Meeting participants/area residents were very pleased with the design and expressed a strong interest in seeing the park constructed in a manner consistent with the presented design concept. On October 25, 2016, City Council approved the Florida Avenue Draft Master Plan, park design concept, and the architectural design services contract for the design phase. The design phase included civil and architectural design including grading plans, planting plans and plant palette, landscape layout, materials plans, irrigation area plans, lighting and electrical plans, and equipment selection such as play equipment, benches, trash receptacles, and picnic tables.

On August 22, 2017, the City Council approved a construction contract with Star Construction, Inc. for the Florida Avenue Park Project. During the project submittal phase, the Contractor identified and requested changes and clarifications related to the design and construction documents. The City did not issue the notice to proceed for the construction work and decided to terminate the contract before work commenced in November 2017. Since that time, City staff has worked with the landscape architecture firm to identify various revisions to construction documents and work through various concerns that were raised about the design and the site.

One of the more significant concerns involved the potential removal of two remaining/heritage trees on the site to protect public health and safety and avoid newfound/increased maintenance costs. This decision is linked to the preferred layout of the park. City staff brought this issue to the attention of the Parks and Recreation Commission at their regular Commission meeting held on September 19, 2018 and received a recommendation on the preferred layout in order to move forward with preparation of final design plans/specifications as well as preparation of the site and documents to rebid the project for construction. Specifically, the Commission recommended to proceed with the recommendation of staff to remove both trees.

Following the Park and Recreation Commission meeting, staff posted the trees for removal in accordance with Municipal Code §8.25.020, which requires a 10 day noticing period. Within the 10-day period, three appeals were received by City staff: one by the City Clerk's office; one by the City Manager; and one by the Community Services Director. All three appeals included the same information and were submitted by the same group of 18 citizens.

The appeal hearing was initially scheduled for October 23, 2018, and was rescheduled to November 13, 2018 at the request of one of the listed appellants. At that meeting, tCity staff gave a presentation recommending the following five listed design changes to the Florida Park Master Plan that were recommended by City staff and the City's landscape architecture firm:

1. Revise design of walkway are along San Anselmo Ave (i.e., maintain existing walkway alignment and replace mulch at the tree planting strip with decomposed granite).
2. Simplify planting inside the play area fence (i.e., eliminate proposed vines on fence, delete two irrigation valves and associated equipment, limit plants and shrubs to varieties that are not easily trampled).
3. Revise fence plan between the park and adjacent residence (i.e., change proposed property line fence from decorative metal to solid six-foot wood fence).

4. Revise irrigation and electrical plans (i.e., amend plans related to service meter dimensions and change irrigation design to revise quick coupler union PVC grade).
5. Remove the existing pine and cedar trees.

Staff's presentation focused on the removal of the two heritage trees and the written reports prepared by two independent, certified arborists that the City hired to evaluate the trees within the context of the approved Florida Park Master Plan : Tree Management Experts and Kielty Arborist Services. The arborists concluded that construction and use ofthe park would impact the trees, which would result in diminished health over the next several years. Both arborists determined that although the form of the cedar tree was poor and permanently disfigured, it did not present a hazard. Although it was likely that the health of the cedar would be impacted due to construction of the park, the root damage is estimated to be moderate at 10-15%.

Upon evaluation of the pine tree both arborists indicated that there would be significant safety risks as well as maintenance costs making it unsuitable for retention. The reports indicated that the pine produces large 2-3 pound seed pods,which could fall without warning from 50 to 80 feet, potentially causing serious harm or death. In addition to the safety risk the pine tree poses, there would be increased maintenance issues and costs related to the play equipment due to the honeydew excretions and falling pine needles. Lastly, there is potential impact to the root structure during construction, as root loss will be between 25-30% for the Norfolk Island Pine.

Based on this information, staff recommended that the City Council authorize the five changes to the current design, including removal of the two existing heritage trees. The estimated time line for these changes was: three to five weeks to revise the design and specifications, a three to six month process to rebid and select a contractor, construction start estimated to begin in the first quarter of 2019, and anticipated completion by the third quarter (July-Sept. 2019).

The Appellants made a presentation recommending that the trees remain in the park, noting that the trees were healthy, that the original park design had been altered, and that any public safety risk was overstated or could be mitigated. Oral testimony was given by 13 individuals supporting the Appellants' recommendation.

The City Council then deliberated, and several Council members noted that they had received phone calls and emails from residents in support of removing the trees. The Council also noted that this is not an environmental impact issue, but really just a neighborhood dispute and that people supporting the removal of the trees did not want to come in person to exacerbate the situation, so they provided feedback via email and phone calls to the Councilmembers instead. A motion was made and seconded to deny the appeal and uphold the staff's recommendation, which passed on a 4-0 vote. Staff indicated that a formal resolution with findings would be presented to the City Council at a later date.

Following the City Council's denial of the appeal, the attorney representing the appellants ("Friends of Florida Park") stated that they would sue the City based on alleged violations of the California Environmental Quality Act ("CEQA") if the trees were removed. To avoid a potentially lengthy delay caused by litigation, the City agreed to defer removing the trees, and met with the appellants and their attorney to discuss whether the matter could be resolved without significantly reducing the useable area of the park, unwarranted expense to relocate or redesign its key features, or unsustainable maintenance requirements. Meetings were scheduled for

December 19, 2018 and January 11, 2019. On March 30, 2019, the City hosted a community event at the park location to obtain input from residents regarding the alternatives. During the gathering, a member of the public asked if the pine were removed, could the City plant a large tree in its place. Staff did some research and obtained information from nurseries about whether a mature native tree such as a coast live oak could be purchased, and for what cost. On May 2, 2019, staff again met with the appellants to explore this idea, which was favorably received.

Following several months of discussions, the City and appellants reached a settlement in which the City would remove the pine and retain the cedar. The City would agree to plant a mature coast live oak in the park in place of the pine. The oak would be approximately 20-25' high and about 18' in breadth. The appellants requested that the City pay their attorney fees to resolve the threat of litigation, and because CEQA allows recovery of attorney's fees in court, the City also agreed to pay the appellants' attorney $15,000. In exchange, the appellants would withdraw their appeal and release the City from all related claims. Per the settlement, the City would consider a revised plan for the park that includes the oak in place of the pine, or in another suitable location within the park.

As a result of the appeal, and to prepare for potential litigation, the City commissioned a historical resources impact analysis by Page & Turnbull. Their report determined that the proposed project was found not to have any impacts on historic resources, and the finding applies whether the park includes or does not include the heritage trees. A biological study was also performed by WRA to address site conditions at the Florida Avenue Park Project site. Their report documented the habitat conditions and the very limited potential for special-status species to be present at the site. The reports are attached to this document as Attachments 1 and 2. Despite these findings, and while the City was confident in its legal position, if the City were sued, litigation could consume several years and cost substantial five- or six-figure sums, delaying the project and making it more costly to build due to construction cost escalation.

DISCUSSION:

The proposed action at this meeting, which conforms to the settlement between the City and the appellants, is for the City Council to review the revised conceptual Florida Park Master Plan prepared by the City's consultant, MIG, and approve it by motion (Attachment 3). The revised design retains all of the park's previously-approved features, makes the modifications previously suggested by staff at the November 2018 meeting, and retains the cedar and removes the pine, which would be replaced with a mature coast live oak.

If the City Council approves the revised conceptual design, MIG will prepare detailed drawings consistent with the approved design suitable for bidding, which will be presented to the City Council for approval by resolution at a later date. It is anticipated that the drawings could be completed by the first quarter of 2020, with a formal bid process to occur thereafter. Park construction could begin in mid-2020.

FISCAL IMPACT:

The FY2018-19 Capital Improvement Program Budget includes a total available appropriation for Florida Avenue Park site demolition and clean-up, planning, design, and construction. Costs expended by the City to mitigate potential City liability and resolve the threat of litigation are estimated to total $76,000 and include approximately $5,000 for the Page and Turnbull historical

assessment, $11,000 for the WRA biological assessment, arborist costs of $3,978, City outside counsel fees of $21,000, fees paid to the appellants' attorney of $15,000, and approximately $20,000 for the coast live oak that will replace the Pine tree. Due to the delay in construction of the park, there will likely be additional expenses associated with cost escalation for construction of the park. City staff are exploring additional funding sources to support the increased costs. At this time, staff requests that the City Council authorize modifications to the Florida Avenue Park Master Plan, and staff will return to Council with final design drawings and cost estimates, which are projected to take two to three months.

ALTERNATIVES:

1. Recommend changes in the conceptual design and direct staff to return at a later meeting.

RECOMMENDATION:

Authorize Modifications to the Florida Avenue Park Master Plan. Staff will return to the City Council with final design drawings and cost estimates, which are projected to take two to three months.

DISTRIBUTION:

1. None

ATTACHMENTS:

1. Page & Turnbull Historical Resources Impact Analysis
2. WRA Biological Technical Memorandum
3. Conceptual Master Plan

DATE PREPARED:

September 16, 2019

324 FLORIDA AVENUE PARK SITE
HISTORIC RESOURCES IMPACT ANALYSIS

SAN BRUNO, CALIFORNIA
[18407]

PREPARED FOR:
CITY OF SAN BRUNO

PAGE & TURNBULL
imagining change in historic environments through design, research, and technology

FEBRUARY 22, 2019
FINAL

ATTACHMENT 1

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I. INTRODUCTION

This Historic Resources Impact Analysis has been prepared at the request of the City of San Bruno for the proposed park site at 324 Florida Avenue (APN 020-366-050, 020-366-060, 020-366-070, 020-366-080, and 020-366-090) **(Figure 1 and Figure 2).** The irregularly-shaped subject parcel is comprised of five unimproved parcels located a few blocks southeast of San Mateo Avenue (San Bruno's commercial corridor), and adjacent to the identified Cupid's Row Historic District, which was previously determined eligible for listing in the California Register of Historical Resources. The subject block is bounded by Taylor Avenue and Florida Avenue to the south, Martin Place to the west, and San Anselmo Avenue North to the east. The subject property previously accommodated four buildings including a single-family residence, a residential duplex, an auto garage, and a workshop; all of these buildings were recently demolished.

Figure 1: Aerial image of subject block and adjacent double heart-shaped street plan with property outlined in orange. Note that the aerial image depicts the subject parcel developed with buildings that have since been demolished. Source: Google Maps, 2019. Edited by Page & Turnbull.

Figure 2: Assessor's map of the subject block and adjacent double heart-shaped street plan. The subject parcel is highlighted in orange. Source: County of San Mateo Assessor. Edited by Page & Turnbull. https://www.smcacre.org/assessor-maps

METHODOLOGY

This report provides a summary of the current historic status of the subject property, a records request overview from the Northwest Information Center of the California Historical Resources Information System, and an existing conditions description of the proposed park site at 324 Florida Avenue. The report also includes a description of the proposed Florida Avenue Park Master Plan and a project impacts analysis. The project impacts analysis identifies potential impacts on identified historic resources pursuant to the California Environmental Quality Act (CEQA), inclusive of project-specific impacts and cumulative impacts analysis.

Page & Turnbull reviewed 90 percent construction documents for the proposed Florida Avenue Park by Moore Iacofano Goltsman, Inc. and BFK Engineers, Surveyors, Planners, dated December 12, 2016; arborist reports completed by Tree Management Experts and Kielty Arborist Services in 2018; and a previous Historic Resource Evaluation report prepared by Page & Turnbull for the City of San Bruno in September 2015. All photographs in this report were taken by Page & Turnbull in February 2019, unless otherwise noted.

SUMMARY OF FINDINGS

In 2015, the four buildings at 324 Florida Avenue were determined ineligible for individual listing in the California Register of Historical Resources (California Register), but the property remained a potential contributor to the identified California Register-eligible Cupids Row Historic District. Due to the recent demolition of all buildings on the site, 324 Florida Avenue would no longer be considered a contributor to the Cupids Row Historic District. This Historic Resources Impact Analysis additionally finds that the proposed Florida Avenue Park Master Plan does not appear to impact any nearby identified historic resources under CEQA, and that the proposed park design is compatible with the Cupid's Row Historic District. These findings apply whether the final park design includes or does not include two heritage trees currently at the site.

II. EXISTING HISTORIC STATUS

324 Florida Avenue is not currently listed in the National Register or California Register and is not listed in the California Historical Resources Information System (CHRIS) San Mateo County database with a status code.

2001 SAN BRUNO REDEVELOPMENT AREA HISTORIC RESOURCE INVENTORY

The City of San Bruno created a San Bruno Redevelopment Area Historic Resource Inventory in 2001, but does not maintain a city-wide local inventory or local preservation ordinance. The San Bruno Redevelopment Plan was adopted in 1999 to improve commercial residential neighborhoods and to stimulate private investment in the oldest part of the City. Like all redevelopment agencies in California, the San Bruno Redevelopment Agency was dissolved in 2012.

The 2001 Historic Resource Inventory, produced by architectural historian Kent Seavey, surveyed the redevelopment area and identified individual properties as well as a potential historic district meeting criteria for listing in the California Register of Historical Resources. The so-called Cupid's Row Historic District, notable for its intertwined double heart-shaped street plan, is located generally between El Camino Real and Huntington Avenue just west of the Southern Pacific Railroad tracks. Platted in 1905 by Hensley Green Company as part of the San Bruno Park Third Addition, the unusual and distinctive roadways define a district with a large concentration of residential housing units constructed between 1909 and 1951. The residences were designed in a mix of architectural styles and the neighborhood is generally associated with the development of railroad/streetcar and automobile suburbs. Approximately 110 properties comprise the potential historic district, with 82 properties identified as potential contributors in 2001.[1]

2015 HISTORIC RESOURCE EVALUATION

Page & Turnbull authored a Historic Resource Evaluation for 324 Florida Avenue in 2015. The summary of determination is excerpted below.

> Research conducted for this report did not find supporting documentation about Henry Perroset, or his woodcarver father Francois Perroset, to demonstrate their significance as artists, craftsmen, or persons important to local, state, or national history. Despite a number of well-crafted elements at the property and continued ownership by the Perroset family since the early twentieth century, the buildings at 324 Florida Avenue do not appear to represent the work of a master or possess high artistic values. Based on the evaluation in this report, the property does not appear individually eligible for listing in the California Register.
>
> 324 Florida Avenue remains a contributor to a potential historic district identified in 2001 as eligible for listing in the California Register. Re-survey of the district is outside the scope of this report, but a cursory examination indicates that the district's 87 contributors remain substantially in place among the approximately 110 properties within the proposed boundaries of the potential district. With the high percentage of contributors remaining, the demolition of 324 Florida Avenue appears to have a less-than-significant impact on the potential district's ability to continue to be eligible for the California Register.[2]

[1] "Cupid's Row Historic District" in *Historical Inventory (San Bruno Redevelopment Area) 2001*, p. 1.
[2] Page & Turnbull, *324 Florida Avenue Historic Resource Evaluation* (September 2015).

Because the buildings at 324 Florida Avenue have been demolished, the property no longer contributes to the identified Cupid's Row Historic District.

2019 NORTHWEST INFORMATION CENTER RECORDS REQUEST

At the request of the City of San Bruno, Page & Turnbull submitted a records request to the Northwest Information Center (NWIC) for historic records (previous reports, maps, and other database information) within a 0.3-mile radius of the property at 324 Florida Avenue. The search area radius was bounded by El Camino Real, San Felipe Avenue, Huntington Avenue, Sylvan Avenue, San Mateo Avenue, and Jenevein Avenue **(Figure 3)**. The results of the cultural resources record search (inclusive of both archeological resources and historical buildings and/or structures) were provided to Page & Turnbull January 25, 2019.[3]

Figure 3: Aerial image of records search area bound by El Camino Real (west), San Felipe Ave (south), Huntington Ave (east), Sylvan Ave (north), San Mateo Ave (north), and Jenevein Ave (north). The search area is outlined in orange and the subject property is indicated with an orange star. Source: Google Maps, 2019. Edited by Page & Turnbull.

The record search identified five cultural resources studies covering approximately 10 percent of the search area:

[3] Northwest Information Center record search results for 324 Florida Avenue, File No. 18-1362 (January 25, 2019).

Report	Year	Title	Author(s)
S-017192 (OHP PRN - UMTA900828A)	1994	BART-San Francisco Airport Extension Project, Draft Environmental Impact Report/Supplemental Environmental Impact Statement, Historic Architectural Survey Technical Report	Laurence H. Shoup, Mark Brack, Nancy Fee, and Bruno Giberti; Cherilyn Widdell; Ward Hill
S-025174	2002	Cultural Resources Report for San Bruno to Mountain View Internodal Level 3 Fiber Optics Project in San Mateo and Santa Clara Counties, California	John Holson, Cordelia Sutch, and Stephanie Pau
S-026045	2000	Cultural Resources Reconnaissance Survey and Inventory Report for the Metromedia Fiberoptic Cable Project, San Francisco Bay Area and Los Angeles Basin Networks	Richard Carrico, Theodore Cooley, and William Eckhardt
S-027930	2003	Cultural Resource Assessment of Alternative Routes for PG&E's Jefferson-Martin Transmission Line, San Mateo County, California	Kyle Brown, Adam Marlow, James Allan, and William Self
S-032250	2003	Historic Property Survey Report, Mission Bells Project, State Route 82/Interstate 101, San Mateo and Santa Clara Counties, California	Philippe Lapin

None of the above listed reports include 324 Florida Avenue; study was concentrated along Huntington Avenue and El Camino Real. The search area contains no previously identified archeological resources.[4] NWIC base maps and/or the State Office of Historic Preservation Historic Property Directory list the following non-archeological resources within the search area:

[4] The NWIC record search results report does indicate there is a moderate potential for unrecorded Native American resources in the proposed Florida Avenue Park project area and there is a high potential for unrecorded historic-period archeological resources in the proposed Florida Avenue Park project area. Further analysis of archaeological resources is outside the scope of this report, which is focused on above-ground built historic resources.

Primary No.	Prop. #	Resource Name	Other IDs	Status Code
P-41-001496	091148	Site of Start of California Highway System	Hist. Res. SPHI-SMA-006	7L
P-41-001526	094974	389 Taylor Ave	Proj. Revw. HUD941220A	6Y
P-41-001581	098875	105 Sylvan Ave	Resource Name - 105 Sylvan Ave; OHP Property Number - 098875; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0025-0000; Other - 105-119 Sylvan Avenue	6Y
P-41-001582	098876	493 Huntington Ave	Resource Name - 493 Huntington Ave; OHP Property Number - 098876; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-026-0000; Other - 2224	6Y
P-41-001583	098877	421, 429, 437, 445, 453, 461, 469, 473, 477, 481, 485 Huntington Ave	Resource Name - 421, 429, 437, 445, 453, 461, 469, 473, 477, 481, 485 Huntington Ave; OHP Property Number - 098877; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0027-0000	6Y
P-41-001584	098878	102 Florida Ave	Resource Name - 102 Florida Ave; OHP Property Number - 098878; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0028-0000	6Y
P-41-001585	098879	104 Florida Ave	Resource Name - 104 Florida Ave; OHP Property Number - 098879; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0029-0000	6Y
P-41-001586	098880	105 Florida Ave	Resource Name - 105 Florida Ave; OHP Property Number - 098880; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0030-0000	6Y
P-41-001587	098881	381 Huntington Ave	Resource Name - 381 Huntington Ave; OHP Property Number - 098881; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0031-0000	6Y
P-41-001588	098882	365 Huntington Ave	Resource Name - 365 Huntington Ave; OHP Property Number - 098882; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0032-0000	6Y
P-41-001665	101774	285 Huntington Ave	Resource Name - 285 Huntington Ave; OHP Property Number - 101774; OHP PRN - UMTA900828A; OHP PRN - DOE-41-95-0076-0000	6Y
P-41-001876	117037	San Bruno Park, Third Addition	OHP PRN - DOE-41-96-0167-0000; OHP Property Number - 117037; Resource Name - San Bruno Park, Third Addition; OHP PRN - UMTA900828A	6Y

The above listed resource P-41-001496 ("Site of Start of California Highway System") is located at the convergence of El Camino Real and San Mateo Avenue. The status code "7L" indicates State Historical Landmarks No. 1 through No. 769 and Points of Historical Interest designated prior to January 1998 which need to be reevaluated using current standards. All other above listed resources with the status code "6Y" have been determined ineligible for the National Register by consensus through Section 106 process (not evaluated for the California Register or Local Listing).[5]

[5] Section 106 of the National Historic Preservation Act requires projects with a federal nexus (federal agency funding and/or ownership) to undergo a project review process to identify adverse effects on potential historic resources.

SAN BRUNO HERITAGE TREE PROGRAM

The City of San Bruno defines a Heritage Tree as: any native Bay (*Umbellularia californica*), Buckeye (*Aesculus* species), Oak (*Quercus* species), Redwood (*Sequoia sempervirens*), or Pine (*Pinus radiata*) tree that has a diameter of six (6) inches or more measured at fifty-four (54) inches above natural grade; any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit; a stand of trees, the nature of which makes each dependent on the others for survival; or any other tree with a trunk diameter of ten (10) inches or more, measured at fifty-four (54) inches above natural grade. The City's Heritage Tree Ordinance declares such trees, whether located on City or private property, to be an asset to the community at large and provides penalties for removing or improperly pruning these trees.[6] Additional information is outlined in Chapter 8.25 of the San Bruno Municipal Code: Heritage Trees.[7]

There are two trees on the subject site that the City of San Bruno determined to be Heritage Trees: a Deodar cedar tree and a Norfolk Island pine tree. Historic resource evaluations do not typically evaluate plants such as trees for historic significance unless they are part of an identified 'cultural landscape' of built and natural features that is eligible for listing in the California Register of Historical Resources. The National Park Service defines a cultural landscape as a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values.[8] There are four non-mutually exclusive types of cultural landscapes: vernacular, designed, historic site, or ethnographic. As described by The Cultural Landscape Foundation, vernacular landscapes have evolved through use by the people whose activities or occupancy shaped those landscapes. Designed landscapes were consciously designed or laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or by an amateur gardener working in a recognized style or tradition. Historic sites are cultural landscapes significant for their association with a historic event, activity, or person. Ethnographic landscapes contain a variety of natural and cultural resources that the associated people define as heritage resources.[9]

Furthermore, the California Register's eligibility criteria require significance associated with the following criteria:

> Criterion 1 (Events): Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
>
> Criterion 2 (Persons): Associated with the lives of persons important to local, California or national history (Criterion 2).
>
> Criterion 3 (Architecture/Design): Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.

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[6] "Trees on Private Property," City of San Bruno. Accessed February 2019, https://www.sanbruno.ca.gov/gov/city_departments/community_services/trees/heritage_trees.htm
[7] "San Bruno Municipal Code Chapter 8.25: Heritage Trees," City of San Bruno. Accessed February 2019, http://qcode.us/codes/sanbruno/view.php?topic=8-8_25&frames=on
[8] National Park Service, "Management Policies 2006: Glossary" (2006) 157. Accessed February 2019, https://www.nps.gov/policy/MP_2006.pdf#page=167
[9] "About Cultural Landscapes." The Cultural Landscape Foundation. Accessed February 2019, https://tclf.org/places/about-cultural-landscapes

> Criterion 4 (Information Potential): Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The two trees at 324 Florida Avenue were not identified as contributing to the significance of the identified Cupid's Row Historic District in Page & Turnbull's 2015 Historic Resource Evaluation. In the site's current unimproved state, the presence of two Heritage Trees at 324 Florida Avenue does not merit categorization as a cultural landscape under any of the types of cultural landscapes, nor does it meet any of the eligibility criteria of the California Register of Historical Resources. Therefore, the two Heritage Trees are not considered historic resources for the purposes of CEQA.

III. PROPERTY DESCRIPTION

SITE

The subject property consists of five unimproved parcels roughly forming a pentagonal site with street frontage at San Anselmo Avenue North to the east, Florida Avenue to the southeast, Taylor Avenue to the southwest, and Martin Place to the west. The north boundary is adjacent to a separate property. The irregularly-shaped site is generally flat and contains one Deodar cedar tree and one Norfolk Island pine tree **(Figure 4 and Figure 5)**. The identification of tree species at the subject property is primarily based on the *Arborist Report* prepared by Tree Management Experts and the *Tree Assessment* prepared by Kielty Arborist Services, both in September 2018.

Figure 4: Deodar cedar tree, located along the site's Martin Place frontage. Source: Kielty Arborist Services, *Tree Assessment* (September 2018).

Figure 5: Norfolk Island pine tree, located at the north end of the property. Source: Kielty Arborist Services, *Tree Assessment* (September 2018).

SURROUNDING NEIGHBORHOOD

The property at 324 Florida Avenue is at the north edge of an unusual subdivision platted in the shape of two hearts. According to a 2001 survey of the California Register-eligible Cupid's Row Historic District,

> The district, defined by its unusual and distinctive roadways, forming a pair of intertwined hearts, contains a large concentration of residential housing units constructed between 1909 and 1951. Their architectural styles range from wood shingled hipped cottages to contractor modern, indicative of architectural forms found in railroad/streetcar and automobile suburbs, of which this is an early and interesting example. Building lots are generally narrow (twenty-five feet), and deep (eighty feet) with varying, but uniform setbacks behind grassed lawns, or more modern hardscapes, with a few trees, but mostly low shrubbery for landscaping. The majority of the residences have detached garages to the rear, while some of the post-WWII [World War II] housing incorporates the garages into the building envelop.[10]

[10] *Historical Inventory (San Bruno Redevelopment Area) 2001*, p.1.

The surrounding neighborhood is residential and includes one- and two-story single-family residences, as well as some two- and three-story multi-family apartment buildings **(Figure 6 to Figure 21)**.[11] El Camino Real (State Route 82) is the main thoroughfare to the west of the identified historic district and the Southern Pacific Railroad tracks that now run the Caltrain commuter rail are to the east. About two miles to the southeast, east of the railroad tracks and Highway 101, is San Francisco International Airport. Despite numerous vinyl and aluminum replacement windows, and some demolished and/or renovated buildings, the Cupid's Row Historic District was evaluated as eligible for the California Register in 2001 with integrity of location, design, setting, feeling, and association.

Figure 6: 400 San Anselmo Avenue North. The property looks southwest to 324 Florida Avenue.

Figure 7: 409 San Anselmo Avenue North. The property sits directly north of 324 Florida Avenue.

Figure 8: 333 Florida Avenue. The property is a contributor to the identified Cupid's Row Historic District and looks northwest to 324 Florida Avenue.

Figure 9: 293 and 305 Florida Avenue. These properties look northwest to 324 Florida Avenue.

[11] Figure captions specify if the property looks onto 324 Florida Avenue. Note this applies to the property boundary, and not necessarily the orientation of the building. Figure captions also specify if the property is a contributor to the identified Cupid's Row Historic District.

Figure 10: 333 Taylor Avenue. The property is a contributor to the identified Cupid's Row Historic District and looks north to 324 Florida Avenue.

Figure 11: 349, 363, 373, and 381 Taylor Avenue. These properties look north to 324 Florida Avenue. All are contributors to the identified Cupid's Row Historic District.

Figure 12: 388 Taylor Avenue. The property is a contributor to the identified Cupid's Row Historic District and looks east to 324 Florida Avenue.

Figure 13: 25 Martin Place. The property looks east to 324 Florida Avenue.

Figure 14: 415 and 413 San Anselmo Avenue North.

Figure 15: 217 Carlton Avenue.

Figure 16: 203 and 211 Carlton Avenue, both contributors to the identified Cupid's Row Historic District.

Figure 17: 202 Carlton Ave and 148 Cupid Row, both contributors to the identified Cupid's Row Historic District.

Figure 18: 163 and 191 Florida Avenue.

Figure 19: 201 Florida Avenue.

Figure 20: 252 Florida Avenue. The property is a contributor to the identified Cupid's Row Historic District.

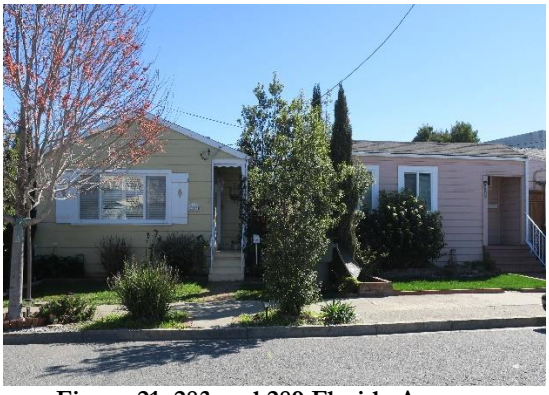

Figure 21: 283 and 289 Florida Avenue.

IV. PROPOSED PROJECT

Project Background

In October 2014, the San Bruno City Council adopted a resolution authorizing the City Manager and City Attorney to purchase 324 Florida Avenue for future use as a neighborhood park.[12] At the time of acquisition, the property included four buildings: a single-family residence, a residential duplex, an auto garage, and a workshop. In May 2016 the City Council authorized a contract for site remediation which included the demolition of the buildings on site.[13] Concurrently with the demolition phase, an extensive community engagement process was conducted with residents of the surrounding area. The first community meeting was held June 2016, and residents were asked to articulate their vision for the park. A concept plan for the park was introduced at the second community meeting held in August 2016. In October 2016 the City Council approved the Florida Avenue Draft Master Plan, park design concept, and the architectural design services contract for the design phase.[14]

Concerns were raised regarding the potential removal of two Heritage Trees on the site (the previously described Deodar cedar and the Norfolk Island pine). Two independent arborist reports were submitted in early September 2018. The Tree Management Experts recommended that the Deodar cedar be pruned and that a Tree Protection Report be created and implemented; they also recommended that the Norfolk Island pine be removed due to risks posed from falling cones.[15] Kielty Arborist Services recommended that both trees be removed.[16] City staff brought the issue to the attention of the Parks and Recreation Committee at their regular Commission meeting held on September 19, 2018 and received a recommendation to move forward with the tree removal. City staff posted the trees for removal (in accordance with Municipal Code Chapter §8.25.020) and received three appeals (containing the same information and all submitted by the group "Friends of Florida Park").

City staff developed two conceptual alternatives for the Parks and Recreation Commission to reconsider, if there was interest in retaining the Heritage Trees. Alternate 1 relocates the children's play area away from the trees and fences off the area around the trees.[17] Alternate 2 eliminates all play equipment in the park and fences off the area around the trees.[18] Due to the arborist reports, site considerations, and desire to provide an appealing new park, City staff again recommended that both Heritage Trees be removed and the City Council denied the Friends of Florida Park appeal.[19]

Proposed Park and Playground Description

Page & Turnbull reviewed 90 percent construction documents for the proposed Florida Avenue Park by landscape architect Moore Iacofano Goltsman, Inc., and BFK Engineers, Surveyors, Planners, dated December 12, 2016. The current proposed park and playground plan is based upon initial community feedback and has been modified from the original concept due to contractor requested changes, arborist recommendations, and City staff review. Most notably, the Heritage Trees were

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[12] "Florida Avenue Park: December 2018 Project Update," City of San Bruno. Accessed February 2019, https://www.sanbruno.ca.gov/gov/city_departments/community_services/new_parks_planning_and_construction/florida_avenue_park.htm
[13] Jovan D. Grogan, San Bruno City Manager, "City Council Agenda Item Staff Report: Appeal of the Removal of Two Heritage Trees from the Florida Avenue Park Development Site" (November 13, 2018), 1.
[14] Ibid.
[15] Tree Management Experts, *Arborist Report* (September 6, 2018).
[16] Kielty Arborist Services, *Tree Assessment* (September 7, 2018).
[17] Alternate 1 will add 2-3 months to the project timeline and may increase the project cost by $50,000-75,000.
[18] Alternate 2 will add 1-2 months to the project timeline and will be less expensive than the current/ recommended design.
[19] Grogan, 2.

initially going to be retained and now are proposed to be removed. Based on information conveyed by the December 2016 drawings, a written description presented on the City's website, and Jovan D. Grogan's November 2018 letter, "City Council Agenda Item Staff Report: Appeal of the Removal of Two Heritage Trees from the Florida Avenue Park Development Site," the proposed project includes the following features:

- Park entrance with signage, seating and scored stone paving;
- Fourteen new trees and new shrub landscaping;
    - Tree species to include big leaf maple, frontier elm, and swan hill olive
    - Shrub landscaping to include dwarf olive and Julia phelps ceanothus
    - Trees and shrubs dispersed throughout park and clustered in community grove and urban woodlands sections
- Children's play area at north section of park with play equipment, rubberized play surfacing, and seating;
- Adult exercise features including a cardio course and multi-generational play equipment
- Neighborhood square at central section of park with scored stone paving, varied seating, and picnic tables;
- Pedestrian paths with bench seating and score stone paving;
    - Walkway area along San Anselmo Avenue North with decomposed granite at the tree planting strip
- Great Lawn area at Florida and Taylor avenues with turf or drought tolerant grass; and
- Solid six-foot wood fence between the park and the adjacent residences

The Florida Park Master Plan documents are available at the Florida Avenue Park page on the City of San Bruno's website:
https://www.sanbruno.ca.gov/gov/city_departments/community_services/new_parks_planning_and_construction/florida_avenue_park.htm

V. CEQA FRAMEWORK FOR EVALUATION OF POTENTIAL IMPACTS

The following information has been included to understand how the provisions of the California Environmental Quality Act would relate to alterations of the subject property at 324 Florida Avenue.

CALIFORNIA ENVIRONMENT QUALITY ACT (CEQA)

The California Environment Quality Act (CEQA) is state legislation (Pub. Res. Code §21000 et seq.), which provides for the development and maintenance of a high quality environment for the present-day and future through the identification of significant environmental effects.[20] CEQA applies to "projects" proposed to be undertaken or requiring approval from state or local government agencies. "Projects" are defined as "…activities which have the potential to have a physical impact on the environment and may include the enactment of zoning ordinances, the issuance of conditional use permits and the approval of tentative subdivision maps."[21] Historic and cultural resources are considered to be part of the environment. In general, the lead agency must complete the environmental review process as required by CEQA. In the case of the proposed project at Mission Dolores Park, the City of San Francisco will act as the lead agency.

According to CEQA, a "project with an effect that may cause a substantial adverse change in the significance of an historic resource is a project that may have a significant effect on the environment."[22] Substantial adverse change is defined as: "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired."[23] The significance of an historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance" and that justify or account for its inclusion in, or eligibility for inclusion in, the California Register.[24] Thus, a project may cause a substantial change in a historic resource but still not have a significant adverse effect on the environment as defined by CEQA as long as the impact of the change on the historic resource is determined to be less-than-significant, negligible, neutral or even beneficial.

A property may qualify as a historic resource if it falls within at least one of four categories listed in CEQA Guidelines Section 15064.5(a), which are defined as:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of section 5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural,

[20] State of California, California Environmental Quality Act, http://ceres.ca.gov/topic/env_law/ceqa/summary.html, accessed 31 August 2007.
[21] Ibid.
[22] CEQA Guidelines subsection 15064.5(b).
[23] CEQA Guidelines subsection 15064.5(b)(1).
[24] CEQA Guidelines subsection 15064.5(b)(2).

engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Pub. Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Pub. Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Pub. Resources Code sections 5020.1(j) or 5024.1. [25]

In 2001, 324 Florida Avenue was identified as a potential contributor to the California Register-eligible Cupid's Row Historic District. In 2015, 324 Florida Avenue was determined ineligible for individual listing in the California Register but was confirmed as a contributor to the identified historic district. Since 2015, all buildings on the subject property have been demolished and the site no longer retains integrity as a district contributor. Thus, the site itself is not considered a historic resource for the purposes of this CEQA review.

Furthermore, as discussed in the previous Existing Historic Status section, the two Heritage Trees that remain on the site do not qualify as historic resources for the purposes of CEQA review.[26]

As the lead agency in CEQA determinations, the City of San Bruno has requested additional review of whether the proposed project will be compatible with any surrounding historic resources. As the NWIC records search confirmed that there are no other identified historic resources in the area, the only known historic resource is the California Register-eligible Cupid's Row Historic District, which was identified in the 2001 San Bruno Redevelopment Area Historic Resource Inventory.

The following discussion analyzes whether the proposed park development project will have any potential impacts on identified historic resources pursuant to CEQA, inclusive of project-specific impacts and cumulative impacts analysis.

PROPOSED PROJECT ANALYSIS

Project-Specific Impacts Under CEQA

The Florida Avenue Park Master Plan project at 324 Florida Avenue does not cause any adverse impacts on the site itself since the previous demolition of the former buildings on the site caused it to no longer be considered a historic resource.

The NWIC records search conducted in January 2019 identified the "Site of Start of California Highway System" as the only identified historic resource within a .3-mile radius of 324 Florida Avenue. The "Site of Start of California Highway System" was assigned a Status Code of "7L," indicating a reevaluation is required. As the "Site of Start of California Highway System" is not a confirmed historic resource, nor is not associated with or within view of the subject site, the

[25] Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.
[26] According to CEQA Guidelines Section 15064.5(a), Category 3: "Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources."

proposed construction of a park and playground at 324 Florida Avenue does not cause an adverse impact on this resource.

324 Florida Avenue is located directly north of a double-heart shaped street plan, which was identified in 2001 as the California Register-eligible Cupid's Row Historic District. The unusual and distinctive roadways define a potential district with a large concentration of residential housing units constructed between 1909 and 1951 in a mix of architectural styles. Approximately 110 properties comprise the potential historic district, with 82 properties identified as potential contributors in 2001. Alterations have and continue to occur to the individual contributors, and there appears to be a limited number of demolished or renovated buildings. However, the unusual and distinctive roadways remain unaltered and windshield surveys in September 2015 and February 2019 indicate that many of the buildings listed as contributors in 2001 appear to remain. The installation of a park at 324 Florida Avenue will result in a minor change to the setting of the district; however, the minor change would not significantly impact the integrity of the district.

324 Florida Avenue is directly visible from approximately six identified potential contributors, and minimally visible from the property lines of another approximately six potential contributors, located some distance away from the subject property.[27] 324 Florida Avenue features four street frontages at Florida Avenue, Taylor Avenue, Martin Place, and San Anselmo Avenue North **(Figure 22 to Figure 25)**. Identified contributors are located on Florida and Taylor avenues and are not located on Martin Place or San Anselmo North. There is no specific threshold established to assess when a proposed project compromises the integrity of a historic district, and consequently would represent an adverse impact to the resource. A generally accepted rule of thumb is that retaining two-thirds or more of the district contributors would not compromise the integrity of a district. As the subject property is currently not considered a contributing resource, the proposed construction of a park and playground at 324 Florida Avenue would not alter the number of contributors to the potential Cupid's Row Historic District or jeopardize the district's continued eligibility for listing in the California Register.

The proposed construction of a park and playground at 324 Florida involves new paving, tree plantings, play equipment, pathways, lawn, and other proposed park features. The Cupid's Row Historic District documentation notes that residential landscaping consists of "grassed lawns, or modern hardscapes, with a few trees, but mostly low shrubbery for landscaping."[28] This description generally matches the proposed park landscaping. Overall, the proposed design (with or without the Heritage Trees) is compatible with the identified district and would not impact the district's integrity of location, design, setting, feeling or association. Therefore, the park development project will not cause an impact to the identified Cupid's Row Historic District.

[27] Cupid's Row Historic District." *Historical Inventory (San Bruno Redevelopment Area)* 2001. Properties include: 221, 240, 268, and 333 Florida Avenue; 333, 349, 363, 381, 388, 389, 431, and 449 Taylor Avenue. Note this is an approximation of contributing properties within the line of sight of 324 Florida Avenue.
[28] Ibid.

Figure 22: View from San Anselmo Avenue North, looking southwest.

Figure 23: View from Florida Avenue, looking northwest.

Figure 24: View from Martin Place, looking southeast.

Figure 25: View from Taylor Avenue, looking northeast.

Cumulative Impacts Under CEQA

"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probably future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The California Register-eligible Cupid's Row Historic District is comprised of approximately 110 properties, with 82 properties identified as potential contributors. Many properties appear to feature vinyl and aluminum replacement windows. Observations indicate that the district has not experienced extensive demolition of potential contributors. Therefore, the proposed Florida Avenue Park Master Plan project at 324 Florida Avenue does not appear to contribute to any cumulative impacts.

VI. CONCLUSION

In 2015, 324 Florida Avenue was determined ineligible for individual listing in the California Register, but remained a potential contributor to the identified California Register-eligible Cupids Row Historic District. This Historic Resources Impact Analysis finds that the proposed Florida Avenue Park Master Plan is compatible with the California Register-eligible Cupid's Row Historic District and does not cause any project-specific or cumulative impacts to historic resources under CEQA. These findings apply whether the final park design includes or does not include two Heritage Trees currently at the site.

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February 25, 2019

Ms. Joanne Magrini
Director, San Bruno Community Services Department.
851 Traeger Ave # 360
San Bruno, CA 94066

Subject: **Biological Technical Memorandum for the Florida Avenue Park Project, 324 Florida Avenue, San Bruno, California**

Dear Ms. Magrini:

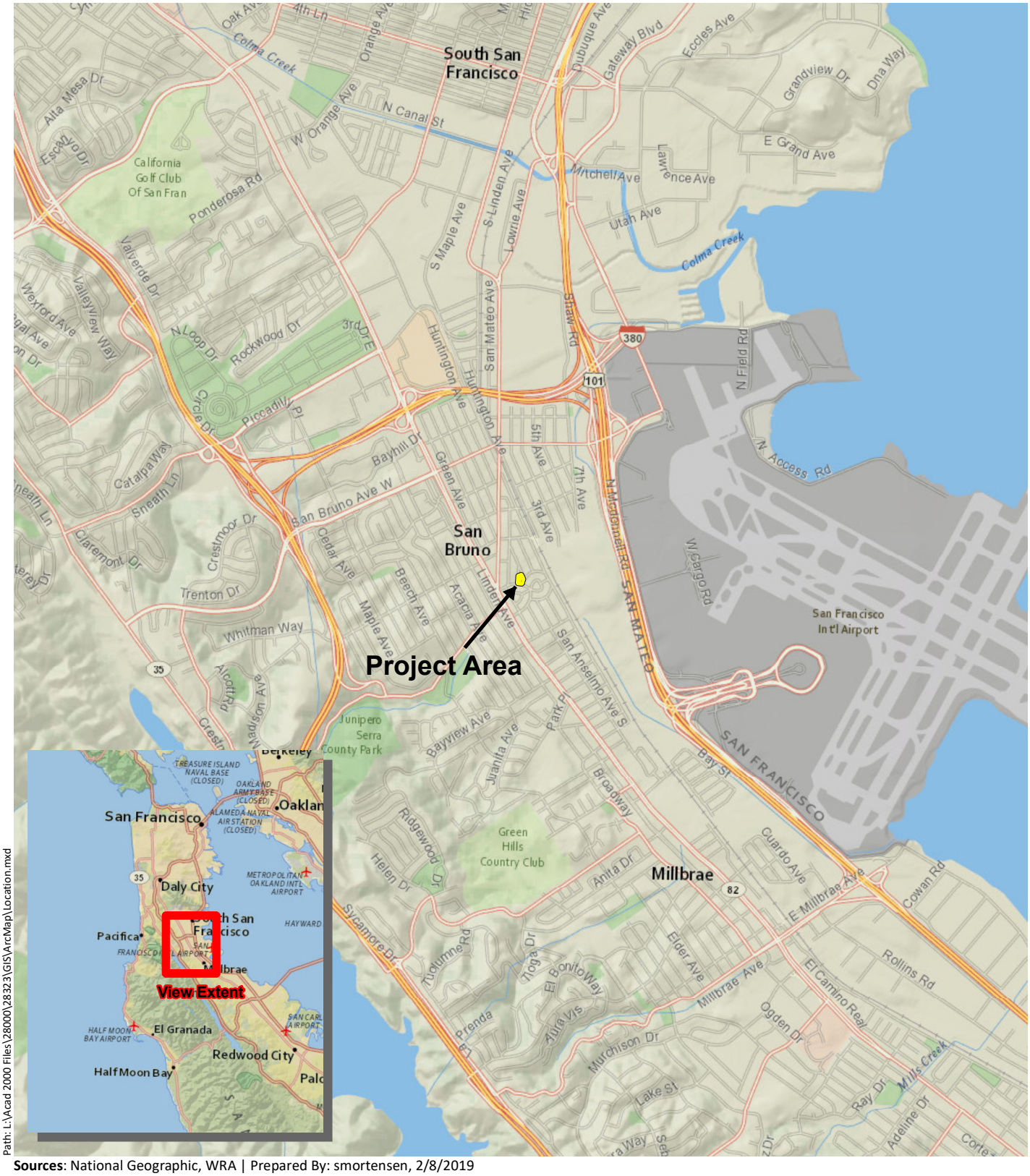
This technical memorandum provides the results of the recent biological survey that WRA, Inc. (WRA) conducted for the Florida Avenue Park Project in San Bruno, San Mateo County, California. The Project Area, (Figure 1) is located approximately half a mile west of San Francisco International Airport and consists of a ruderal/disturbed, formerly residential parcel that has undergone remediation.

This report describes the results of the Biological evaluation and site visit to the Project Area to address: (1) presence of special-status plant and wildlife species; (2) potential to support special-status plant and wildlife species; and (3) the presence of other sensitive biological resources protected by local, state, and federal laws and regulations including the identification of any wetlands and non-wetland waters. This memorandum also contains an evaluation of potential impacts to special-status species and sensitive biological resources that may or may not occur as a result of the Proposed Project.

PROJECT DESCRIPTION

The Proposed Project includes the construction of a pocket park in San Bruno's Florida Avenue neighborhood. The park is anticipated to include benches, picnic tables and play equipment, in addition to tree and vegetation plantings. The Proposed Project will potentially involve the removal of two heritage trees, for which two arborist reports have been prepared (Kielty 2018 and Liggett 2018). Tree removal is predicated on the overall age and condition of the trees as well as concerns that large, dense pinecones could become a hazard if they were to fall on park users below. Replacement vegetation will include trees, shrubs, groundcover and grasses, stormwater planter perennials, and vines. The park is designed to meet the needs of the neighborhood and reflect the desires of the community.

2169-G East Francisco Blvd., San Rafael, CA 94901 (415) 454-8868 tel (415) 454-0129 fax info@wra-ca.com www.wra-ca.com



Sources: National Geographic, WRA | Prepared By: smortensen, 2/8/2019

Figure 1. Project Area Regional Location Map

Florida Avenue Park
San Bruno, San Mateo County, California

0 0.5 1 Miles

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BIOLOGICAL SITE ASSESSMENT

The evaluation of biological resources presented in this report is based on a site visit conducted by a WRA biologist on February 12, 2019, review of background literature, and professional scientific judgment of WRA biologists with expertise in the characteristics of the Project Area as well as regional vegetation, plant, and wildlife species. Background literature sources utilized for the review included, but were not limited to:

- California Natural Diversity Database records (CNDDB; CDFW 2019a)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) Species List (USFWS 2019a)
- The Western Bat Working Group (WBWG) online species accounts (WBWG 2019)
- CDFG publication "California Bird Species of Special Concern" (Shuford and Gardali 2008)
- CDFW publication "California Amphibians and Reptile Species of Special Concern" (Thomson et al. 2016)
- Breeding Bird Atlas of San Mateo County, California (Metropulos et al. 2001)

Plant and wildlife species observed within the Project Area were documented (Table 1) and all biological communities were documented.

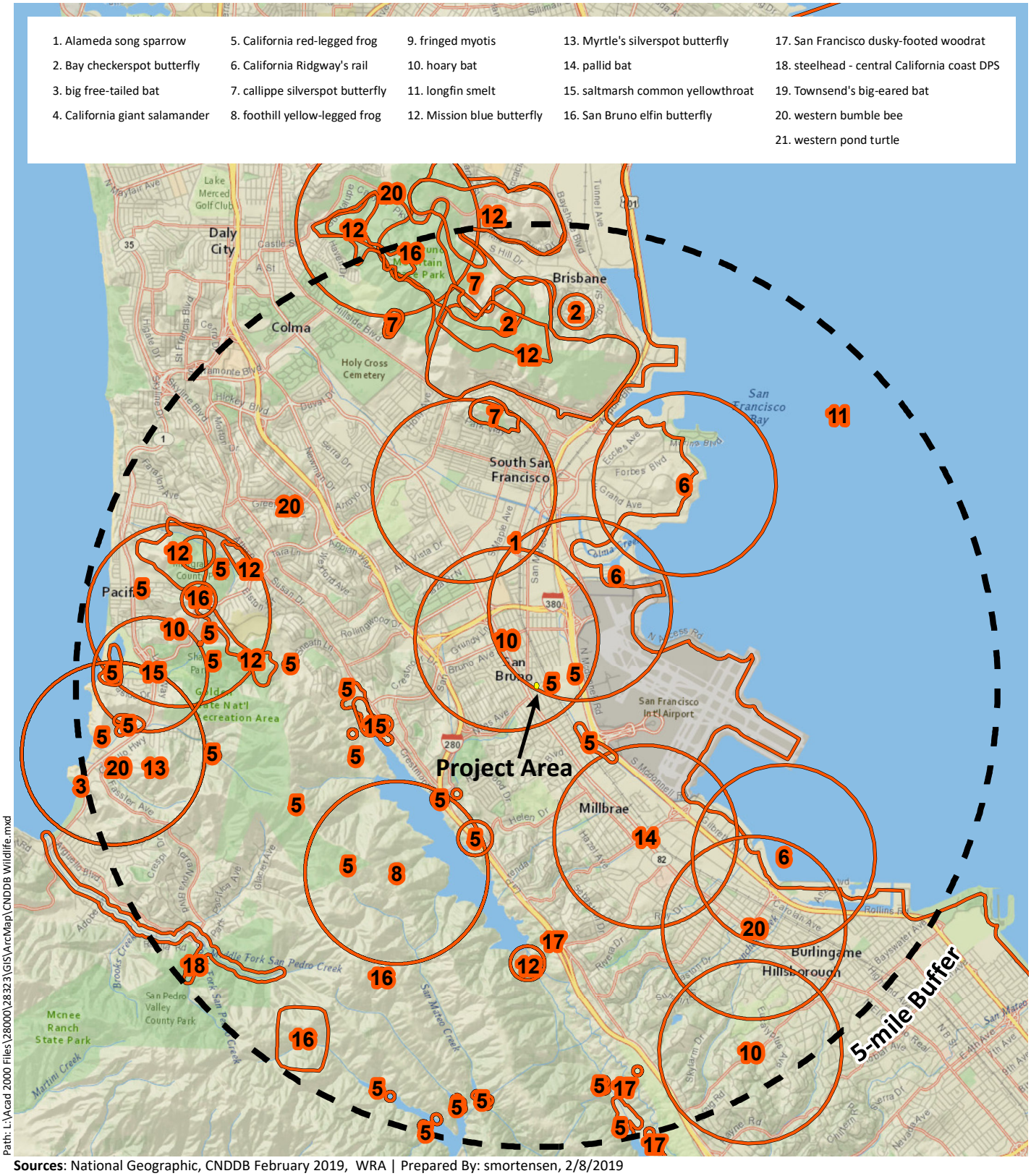
ASSESSMENT RESULTS

Biological Communities

The Project Area is approximately 0.4 acres of previously developed and ruderal/disturbed areas (Attachment A - Site Photographs). No native or naturalized vegetation alliances are present and common non-native and invasive plants species adapted to disturbance occupy these areas. There are two trees within the Project Area. The closest water feature to the Project Area is a flood control channel to the east, separated from the Project Area by dense residential development, and two sets of train tracks. The triangular site is bordered by minimally landscaped sidewalks to the east, west, and south, and by a residence directly to the north. The substrate of the area is disturbed in ruderal/disturbed areas with engineered fill. Ruderal/disturbed areas are dominated by non-native, invasive plants. Ruderal/disturbed areas are not considered environmentally sensitive, and have a very low potential to support special-status plant species, particularly in the landscape context present on site, completely surrounded by roads and dense residential development. The two trees in the Project Area are non-native species and have low potential to serve as habitat for special status wildlife species in this area. Non-special status birds protected under the MBTA or CDFW codes could potentially utilize the trees for nesting.

Special-status Plant and Wildlife Species

A total of 34 special-status wildlife species have been documented from the San Francisco South, Hunter's Point, Montara Mountain, and San Mateo 7.5 minute quadrangles (Attachment B), and 21 of those special-status species are found within 5 miles of the Project Area (Figure2). Given the site conditions, however, the Project Site has no potential to support any special-status plant species. The entirety of the Project Area is comprised of disturbed ruderal, non-native habitat;



Path: L:\Acad 2000 Files\28000\28323\GIS\ArcMap\CNDDB Wildlife.mxd

Sources: National Geographic, CNDDB February 2019, WRA | Prepared By: smortensen, 2/8/2019

Figure 2. Special-Status Wildlife Species Documented within 5-miles of the Project Area

Florida Avenue Park
San Bruno, San Mateo County, California

0 1 2 Miles

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none of the hydrologic, soil, topographic, or pH conditions; aquatic, wetland or vernal pool habitats; upland grassland habitats; or specific larval host plants that are necessary to support special-status plants and/or wildlife exist within or immediately adjacent to the Project Area. The land has been developed for many decades, and this land use history has degraded the local habitat and virtually eliminated any potential for special-status species to inhabit or move through the Project Area.

There is an approximately 45-foot deodar cedar (*Cedrus deodara*) present within the Project Area. The tree is generally in poor condition, with possible crown rot due to a past topping, with numerous dead limbs recently removed (Kielty 2018). Additionally, a 90-foot Norfolk Island pine (*Araucaria heterophylla*) is also present within the Project Area, and is in fair condition (Kielty 2018). The tree is located approximately 4 feet from a residence, with the upper branches situated directly overhead the residence. The tree has lost its top, and thus side limb development is likely to be faster, and those limbs will be proportionally longer, increasing the risk of limb failure (Leggitt 2018).

All plant and wildlife species observed during the February 12, 2019 site visit were common, urban-adapted native species, ornamental plants used in landscaping, or non-native invasive plants and wildlife. Wildlife and plant species observed during the site visit are listed in Table 1 below:

Table 1: Wildlife and dominant plant species observed on February 12, 2019 site visit

Common Name	Scientific Name
Wildlife	
House sparrow	*Carpodacus mexicanus*
Rock pigeon	*Columba livia*
American crow	*Corvus brachyrhynchos*
European starling	*Sturnus vulgaris*
House finch	*Passer domesticus*
Mourning dove	*Zenaida macroura*
Domestic cat	*Felis domesticus*
Western gray squirrel	*Sciurus griseus*
Plants	
Norfolk Island pine	*Araucaria heterophylla*
Deodar cedar	*Cedrus deodara*
Fat-hen	*Atriplex prostrata*
Wildoats	*Avena fatua*
Deadly nightshade	*Atropa belladonna*
Black mustard	*Brassica nigra*

Although the Project Area does not constitute habitat for any special-status species, the two trees on the site may be used as nesting habitat by bird species protected by the Migratory Bird Treaty Act (MBTA) and CDFW codes. These laws apply to a wide variety of native birds, including species that are non-migratory and/or commonly found in San Mateo County. Disturbance to breeding birds within and adjacent to the Project Area from construction noise and tree trimming or removal could result in nest abandonment or failure, which is considered a violation of the MBTA or CDFW codes.

Assessing the site according to the California Environmental Protection Act (CEQA) Environmental Checklist (Appendix G), as summarized in Table 2, we find the project does not have the potential to cause adverse impacts according based on the established thresholds of significance.

SUMMARY & RECOMMENDATIONS

Based on the site visit and review of information pertinent to the Project Area, the construction of the Project will not result in impacts to special-status plant and wildlife species or to any sensitive habitats. The habitats required by the special-status species known to occur in the Project Area vicinity are not present due to the developed nature of the Project Area, persistence of non-native species, and overall lack of natural habitat. The Project Area is subject to regular human disturbance from traffic and other activities.

The Project would have no impact to nesting birds protected by the MBTA and CDFW codes as long as construction occurs from September 1 to January 31, outside of the breeding bird season. If ground disturbance or vegetation removal must be conducted between February 1 and August 31, a qualified biologist will conduct preconstruction nesting bird surveys. These surveys will occur no less than 14 days prior to the start of ground disturbance or vegetation removal in any given area of construction to locate any nesting birds within the Project Area and adjacent areas that may be impacted by the Project. If nesting birds are found, they will be avoided by Project activities until a qualified biologist determines that the young have fledged. If construction activities do not begin within 14 days from the time of the survey, another survey will be completed before work begins.

Because the Project is in a highly developed area, nesting birds may be accustomed to regular disturbance and may nest over or adjacent to the Project Area. If a bird nests within the Project Area after the start of construction, construction activities can continue as long as the nest is physically avoided and construction noise levels do not significantly increase.

Table 2: California Environmental Quality Act (CEQA) Environmental Checklist: Appendix G.

Would the Project:	**Analysis**
A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	The Project Area has been developed for many decades, and this land use history has degraded the local habitat and virtually eliminated any potential for special-status species that will inhabit or move through the Project Area. The Project will not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	The Project Area does not contain any riparian habitat or other sensitive natural communities, thus will not have a substantial adverse effect on those communities.
C. Have a substantial adverse effect on state or federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	The Project Area does not contain any state or federally protected wetlands, thus will not have a substantial adverse effect on those features.
D. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	The Project Area is situated within dense residential development, and does not serve as a migration corridor, nor does it contain native wildlife nursery sites. It is not within any essential connectivity areas (CNDDB 2019).
E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	The Project does not conflict with any local policies or ordinances protecting biological resources. The city of San Bruno has obtained a Tree Removal Permit for the removal of two heritage trees within the Project Area.
F. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	The Project does not conflict with the provisions of any local, regional, or state conservation plans.

If you have questions or require additional information, please do not hesitate to contact me or Paul Curfman, at 415-524-7544.

Sincerely,

Stewart DesMeules
WRA Biologist

Enclosures:

Attachment A: Representative Photographs of the Project Area

Attachment B: CNDDB and USFWS Results for a 5-mile radius around the Project Area

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Attachment A

Representative Photographs of the Project Area

The Project Area, facing north towards the deodar cedar and Norfolk Island pine.

View of the deodar cedar and the pruned Norfolk Island pine.

The Project Area, facing south.

Residential development and road adjacent to the Project Area.

Scar at the base of the Norfolk Island pine.

Removed bark at the base of the deodar cedar within the Project Area.

Attachment B

Figure 2. Special-status Wildlife Species Documented Within 5-miles of the Project Area

Appendix B. Potential for Special Status Wildlife Species to Occur in the Project Area. List compiled from the California Department of Fish and Wildlife (CDFW) Natural Diversity Database (2019), U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation Database (2019), searches of the San Francisco South, Hunter's Point, Montara Mountain, and San Mateo USGS 7.5' quadrangles, a review of historical and current satellite imagery via Google Earth (2019) and a review of other CDFW lists and publications.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Mammals				
American badger *Taxidea taxus*	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Requires friable soils and open, uncultivated ground. Preys on burrowing rodents.	**No Potential.** No suitable open shrub, forest or herbaceous habitat exists within the Project Area.	No further actions are recommended for this species.
southern sea otter *Enhydra lutris nereis*	FT, CFP, MMC SSC	Nearshore marine environments from about Año Nuevo, San Mateo County. To Point Sal, Santa Barbara County. Needs canopies of giant kelp and bull kelp for rafting and feeding. Prefers rocky substrates with abundant invertebrates.	**No Potential.** No aquatic habitat exists within the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
fringed Myotis *Myotis thysanodes*	WBWG High	Associated with a wide variety of habitats including dry woodlands, desert scrub, mesic coniferous forest, grassland, and sage-grass steppes. Buildings, mines and large trees and snags are important day and night roosts.	**No Potential.** No rocky outcrops, cliffs or caves are present within the Project Area. Trees within the Project Area don't contain suitable structural features to support roosting by this species.	No further actions are recommended for this species.
pallid bat *Antrozous pallidus*	SSC, WBWG	Found in deserts, grasslands, shrublands, woodlands, and forests. Most common in open, forages along river channels. Roost sites include crevices in rocky outcrops and cliffs, caves, mines, trees and various human structures such as bridges, barns, and buildings (including occupied buildings). Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	**No Potential.** No rocky outcrops, cliffs or caves are present within the Project Area. The existing structures on the property don't support thermally stable conditions required by this species. Trees within the Project Area are small and don't contain suitable structural features to support roosting by this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Townsend's big-eared bat *Corynorhinus townsendii*	SC, SSC, WBWG	This species is associated with a wide variety of habitats from deserts to mid-elevation mixed coniferous-deciduous forest. Females form maternity colonies in buildings, caves and mines and males roost singly or in small groups. Foraging occurs in open forest habitats where they glean moths from vegetation.	**No Potential.** The Project Area does not contain the mixed coniferous forest typically associated with this species, and does not contain caves or other similar structures to support roosting.	No further actions are recommended for this species.
silver-haired bat *Lasionycteris noctivagans*.	WBWG	Primarily a forest dweller, feeding over streams, ponds, and open brushy areas. Summer habitats include a variety of forest and woodland types, both coastal and montane. Roosts in hollow trees, snags, buildings, rock crevices, caves, and under bark.	**No Potential.** No water sources exist within the Project Area. Trees within the Project Area don't contain suitable structural features to support roosting by this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
hoary bat *Lasiurus cinereus*	WBWG	Prefers open forested habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.	**No Potential.** The Project Area does not contain suitable trees required for roosting by this species.	No further actions are recommended for this species.
big free-tailed bat *Nyctinomops macrotis*	SSC, WBWG	Occurs rarely in low-lying arid areas. Requires high cliffs or rocky outcrops for roosting sites.	**No Potential.** No high cliffs or rocky outcrops are present within the Project Area. This Project Area is also outside of the typical range for this species.	No further actions are recommended for this species.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	SSC	Forest habitats of moderate canopy and moderate to dense understory. Also in chaparral habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.	**No Potential.** No suitable forest or chaparral habitats exist within the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
salt-marsh harvest mouse *Reithrodontomys raviventris*	FE, SE, CFP	Endemic to emergent salt and brackish wetlands of the San Francisco Bay Estuary. Pickleweed marshes are primary habitat; also occurs in various other wetland communities with dense vegetation. Does not burrow, builds loosely organized nests. Requires higher areas for flood escape.	**No Potential.** The Project Area does not contain emergent salt and brackish wetlands.	No further actions are recommended for this species.
Birds				
tricolored blackbird *Agelaius tricolor*	ST, BCC, SSC	Nearly endemic to California, where it is most numerous in the Central Valley and vicinity. Highly colonial, nesting in dense aggregations over or near freshwater in emergent growth or riparian thickets. Also uses flooded agricultural fields. Abundant insect prey near breeding areas essential.	**No Potential.** The Project Area does not contain wetlands with emergent vegetation to support breeding in this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
marbled murrelet *Brachyramphus marmoratus*	FT, SE	Predominantly coastal marine. Nests in old-growth coniferous forests up to 30 miles inland along the Pacific coast, from Eureka to Oregon border, and in Santa Cruz/San Mateo Counties. Nests are highly cryptic, and typically located on platform-like branches of mature redwoods and Douglas firs. Forages on marine invertebrates and small fishes.	**No Potential.** The Project Area does not contain suitable forest habitat to support breeding in this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
bank swallow *Riparia riparia*	ST	Summer resident in riparian and other lowland habitats near rivers, lakes and the ocean in northern California. Nests colonially in excavated burrows on vertical cliffs and bank cuts (natural and manmade) with fine-textured soils. Historical nesting range in southern and central areas of California has been eliminated by habitat loss. Currently known to breed in Siskiyou, Shasta, and Lassen Cos., portions of the north coast, and along Sacramento River from Shasta Co. south to Yolo Co.	**No Potential.** No vertical cliffs, bank cuts, or other suitable nesting habitat exists for this species in the Project Area.	No further actions are recommended for this species.
grasshopper sparrow *Ammodramus savannarum*	SSC	Summer resident. Breeds in open grasslands, generally with low- to moderate-height grasses and scattered shrubs. Well-hidden nests are placed on the ground.	**No Potential.** No grasslands this species would utilize for nesting are present within the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
golden eagle *Aquila chrysaetos*	BCC, CFP	Occurs year-round in rolling foothills, mountain areas, sage-juniper flats, and deserts. Cliff-walled canyons provide nesting habitat in most parts of range; also nests in large trees, usually within otherwise open areas.	**No Potential.** There are no cliffs, rocky outcroppings or suitable trees that would support nesting by this species.	No further actions are recommended for this species.
great egret *Ardea alba*	none (breeding sites protected by CDFW); CDF sensitive	Year-round resident. Nests colonially or semi-colonially, usually in trees, occasionally on the ground or elevated platforms. Breeding sites usually in close proximity to foraging areas: marshes, lake margins, tidal flats, and rivers. Forages primarily on fishes and other aquatic prey, also smaller terrestrial vertebrates.	**No Potential.** The Project Area does not contain any potential roost trees close enough to water to be utilized by this species. Species may occasionally fly over the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
short-eared owl *Asio flammeus*	SSC	Occurs year-round, but primarily as a winter visitor; breeding very restricted in most of California. Found in open, treeless areas (e.g., marshes, grasslands) with elevated sites for foraging perches and dense herbaceous vegetation for roosting and nesting. Preys mostly on small mammals, particularly voles.	**No Potential.** The Project Area does not contain marsh habitat, and is outside the known breeding range for this species.	No further actions are recommended for this species.
long-eared owl *Asio otus*	SSC	Occurs year-round in California. Nests in trees in a variety of woodland habitats, including oak and riparian, as well as tree groves. Requires adjacent open land with rodents for foraging, and the presence of old nests of larger birds (hawks, crows, magpies) for breeding.	**No Potential.** The Project Area does not contain the riparian habitat used by this species for nesting.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
burrowing owl *Athene cunicularia*	SSC, BCC	Year-round resident and winter visitor. Occurs in open, dry grasslands and scrub habitats with low-growing vegetation, perches and abundant mammal burrows. Preys upon insects and small vertebrates. Nests and roosts in old mammal burrows, most commonly those of ground squirrels.	**No Potential.** No open grassland exists within the Project Area. Additionally, no suitable burrows, or burrow surrogates were observed within the Project Area during the site visit.	No further actions are recommended for this species.
oak titmouse *Baeolophus inornatus*	BCC	Occurs year-round in woodland and savannah habitats where oaks are present, as well as riparian areas. Nests in tree cavities.	**No Potential.** The two trees within the Project Area contain no suitable nesting cavities for this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Swainson's hawk *Buteo swainsoni*	ST, BCC	Summer resident in California's Central Valley. Nests in tree groves and isolated trees in riparian and agricultural areas, including near buildings. Forages in grasslands and scrub habitats as well as agricultural fields, especially alfalfa. Preys on arthropods year-round as well as smaller vertebrates during the breeding season.	**No Potential.** The Project Area and surroundings do not contain the flat, open habitat this species requires for nesting and foraging.	No further actions are recommended for this species.
western snowy plover *Charadrius nivosus (alexandrines) nivosus*	FT, SSC, BCC, RP	Federal listing applies only to the Pacific coastal population. Year-round resident and winter visitor. Occurs on sandy beaches, salt pond levees, and the shores of large alkali lakes. Nests on the ground, requiring sandy, gravelly or friable soils.	**No Potential.** The Project Area does not contain any beaches, salt pond levees or alkali lakes.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
northern harrier *Circus cyaneus*	SSC	Year-round resident and winter visitor. Found in open habitats including grasslands, prairies, marshes and agricultural areas. Nests on the ground in dense vegetation, typically near water or otherwise moist areas. Preys on small vertebrates.	**No Potential. D**ue to the highly disturbed nature of the Project Area and close proximity to roads, and residences, and the Project Area contains no suitable grassland, prairie or marsh habitat to support nesting in this species.	No further actions are recommended for this species.
olive-sided flycatcher *Contopus cooperi*	SSC, BCC	Summer resident. Typical breeding habitat is montane coniferous forests. At lower elevations, also occurs in wooded canyons and mixed forests and woodlands. Often associated with forest edges. Arboreal nest sites located well off the ground.	**No Potential.** The Project Area does not contain the woodland, forest, or riparian habitats required by this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
yellow rail *Coturnicops noveboracensis*	BCC, SSC	Summer resident in eastern Sierra Nevada in Mono County, breeding in shallow freshwater marshes and wet meadows with dense vegetation. Also a rare winter visitor along the coast and other portions of the state. Extremely cryptic.	**No Potential.** The Project Area does not contain the freshwater marsh habitat this species requires for breeding.	No further actions are recommended for this species.
white-tailed kite *Elanus leucurus*	CFP	Year-round resident in coastal and valley lowlands with scattered trees and large shrubs, including grasslands, marshes and agricultural areas. Nests in trees, of which the type and setting are highly variable. Preys on small mammals and other vertebrates.	**No Potential.** The Project Area provides no foraging habitat for this species and the trees within the Project Area have no potential to support nesting by this species. The species may occasionally fly over the area.	No further actions are recommended for this species.
snowy egret *Egretta thula*	none (breeding sites protected by CDFW)	(Rookery) colonial nester, with nest sites situated in protected beds of dense tules. Rookery sites situated close to foraging areas: marshes, tidal-flats, streams, wet meadows, and borders of lakes.	**No Potential.** The Project Area does not contain any potential roost trees close enough to water to be utilized by this species. Species may occasionally fly over the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
American peregrine falcon *Falco peregrinus anatum*	FD, SD, CFP, BCC	Year-round resident and winter visitor. Occurs in a wide variety of habitats, though often associated with coasts, bays, marshes and other bodies of water. Nests on protected cliffs and also on man-made structures including buildings and bridges. Preys on birds, especially waterbirds. Forages widely.	**No Potential.** The Project Area does not contain suitable elevated nesting structures such as cliffs, tall buildings, or transmission towers. This species may occasionally pass through the Project Area.	No further actions are recommended for this species.
Saltmarsh common yellowthroat *Geothlypis trichas sinuosa*	BCC, SSC	Resident of the San Francisco Bay region, in fresh and salt water marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	**No Potential.** The Project Area does not contain marsh habitat, tall shrubs or other suitable vegetation required for nesting.	No further actions are recommended for this species.
black oystercatcher *Haematopus bachmani*	BCC	Year-round resident of rocky coast habitats along the Pacific coast. Also occurs on coastal and lower estuarine mud-flats. Forages primarily on intertidal invertebrates.	**No Potential.** The Project Area does not contain coastal cliffs or estuarine habitats required for nesting and foraging by the species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
caspian tern *Hydroprogne caspia*	BCC	Summer resident in northern California. Nests colonially on sparsely-vegetated islands (including man-made islands), sandbars and beaches near expanses of open water. Forages on fishes.	**No Potential.** The Project Area does not contain and is not near flat sand or gravel flats which are required to support nesting by this species.	No further actions are recommended for this species.
least bittern *Ixobrychus exilis*	SSC, BCC	Summer resident in portions of the Central Valley and southern California. Typically breeds in deeper freshwater marshes with dense emergent and woody vegetation.	**No Potential.** The Project Area does not contain any marsh habitat needed by this species for nesting.	No further actions are recommended for this species.
loggerhead shrike *Lanius ludovicianus*	BCC, SSC	Year-round resident in open woodland, grassland, savannah and scrub. Prefers areas with sparse shrubs, trees, posts, and other suitable perches for foraging. Preys upon large insects and small vertebrates. Nests are well-concealed in densely-foliaged shrubs or trees.	**No Potential.** The Project Area does not contain suitable open habitats for foraging by this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
California black rail *Laterallus jamaicensis coturniculus*	ST, CFP	Year-round resident in marshes (saline to freshwater) with dense vegetation within four inches of the ground. Prefers larger, undisturbed marshes that have an extensive upper zone and are close to a major water source. Extremely secretive and cryptic.	**No Potential.** The Project Area does not contain the marsh habitat this species requires for breeding.	No further actions are recommended for this species.
Lewis's woodpecker *Melanerpes lewis*	BCC	Uncommon resident in California occurring on open oak savannahs, broken deciduous and coniferous habitats. Breeds primarily in ponderosa pine forests, riparian woodlands and disturbed pine forests but is also known to nest in orchards and oak woodlands. Rare nester in the San Francisco Bay Area.	**No Potential.** The Project Area does not contain any pine forests or riparian woodlands required by this species for nesting.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Alameda song sparrow *Melospiza melodia pusillula*	BCC, SSC	Year-round resident of salt marshes bordering the south arm of San Francisco Bay. Inhabits primarily pickleweed marshes; nests placed in marsh vegetation, typically shrubs such as gumplant.	**No Potential.** The Project Area does not contain emergent brackish water vegetation that this species typically inhabits.	No further actions are recommended for this species.
Samuels (San Pablo) song sparrow *Melospiza melodia samuelis*	BCC, SSC	Year-round resident of tidal marshes along the north side of San Francisco and San Pablo Bays. Typical habitat is dominated by pickleweed, with gumplant and other shrubs present in the upper zone for nesting. May forage in areas adjacent to marshes.	**No Potential.** The Project Area does not contain emergent brackish water vegetation that this species typically inhabits.	No further actions are recommended for this species.
black-crowned night heron *Nycticorax nycticorax*	none (breeding sites protected by CDFW)	(Rookery) colonial nester, usually in trees, occasionally in tule patches. Rookery sites located adjacent to foraging areas: lake margins, mud-bordered bays, marshy spots.	**No Potential.** The Project Area does not contain any potential roost trees close enough to water to be utilized by this species. Species may occasionally fly over the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
double-crested cormorant *Phalacrocorax auritus*	DFG:WL	(Rookery site) colonial nester on coastal cliffs, offshore islands, and along lake margins in the interior of the state. Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.	**No Potential.** The Project Area does not contain any potential roost trees close enough to water to be utilized by this species. Species may occasionally fly over the Project Area.	No further actions are recommended for this species.
Nuttall's woodpecker *Picoides nuttallii*	BCC	Year-round resident in lowland woodlands throughout much of California west of the Sierra Nevada. Typical habitat is dominated by oaks; also occurs in riparian woodland. Nests in tree cavities.	**Unlikely.** The trees within the Project Area do not contain suitable cavities for nesting. The species may occasionally fly over the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
California Ridgway's (clapper) rail *Rallus obsoletus obsoletus*	FE, SE, CFP	Year-round resident in tidal marshes of the San Francisco Bay estuary. Requires tidal sloughs and intertidal mud flats for foraging, and dense marsh vegetation for nesting and cover. Typical habitat features abundant growth of cordgrass and pickleweed. Feeds primarily on molluscs and crustaceans.	**No Potential.** The Project Area does not contain the saltwater marsh habitat this species requires for breeding.	No further actions are recommended for this species.
short-tailed albatross *Phoebastria albatrus*	FE, SSC	Highly pelagic; comes to land only when breeding. Nests on remote Pacific islands. A rare non-breeding visitor to the eastern Pacific.	**No Potential.** The Project Area contains no breeding habitat for this species.	No further actions are recommended for this species.
black skimmer *Rynchops niger*	BCC, SSC	Found primarily in southern California; South San Francisco Bay has a small resident population. Nests colonially on gravel bars, low islets, and sandy beaches	**No Potential.** The Project Area does not contain and is not near flat sand or gravel bar habitats required to support nesting by this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Allen's hummingbird *Selasphorus sasin*	BCC	Summer resident along the California coast, breeding in a variety of woodland and forest habitats, including parks and gardens with abundant nectar sources. Nest in shrubs and trees with dense vegetation.	**Unlikely. T**he Project Area does not contain open woodlands chaparral or scrub habitats that are known to support nesting by this species.	No further actions are recommended for this species.
Lawrence's goldfinch *Spinus (= Carduelis) lawrencei*	BCC	Summer resident; generally uncommon and local. Typically found in arid open woodlands, including oak savannah. Breeding distribution is erratic from year to year.	**No Potential.** The Project Area does not contain the open woodland or savannah habitats this species prefers.	No further actions are recommended for this species.
black-chinned sparrow *Spizella atrogularis*	BCC	Prefers sloping ground in mixed chaparral, chamise-redshank chaparral, sagebrush, and similar brushy habitats. Often on arid, south-facing slopes with ceanothus, manzanita, sagebrush, and chamise.	**No Potential.** The Project Area does not contain any chaparral or similar brushy habitats.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
California least tern *Sternula antillarum browni*	FE, SE, CFP	Summer resident along the coast from San Francisco Bay south to northern Baja California; inland breeding also very rarely occurs. Nests colonially on barren or sparsely vegetated areas with sandy or gravelly substrates near water, including beaches, islands, and gravel bars. In San Francisco Bay, has also nested on salt pond margins.	**No Potential.** The Project Area does not contain and is not near flat sand or gravel flats which are required to support nesting by this species.	No further actions are recommended for this species.
Suisun song sparrow *Melospiza melodia maxillaris*	BCC, SSC	Year-round resident of brackish-water marshes along Suisun Bay. Inhabits cattails, tules, bulrushes and other emergent vegetation, including pickleweed. Nests typically placed in shrubs.	**No Potential.** The Project Area does not contain emergent brackish water vegetation that this species typically inhabits.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
yellow-billed magpie *Pica nuttalli*	BCC	Endemic to the Central Valley and central Coast Ranges. Favors open park-like areas with expanses of open ground, including oak savannah, orchards, and along stream courses. Large, dome-shaped stick nests are placed in trees.	**No Potential.** This species is not known to nest within the vicinity of the Project Area.	No further actions are recommended for this species.
yellow warbler *Setophaga (Dendroica) petechia brewsteri*	SSC, BCC	Summer resident throughout much of California. Breeds in riparian vegetation close to water, including streams and wet meadows. Microhabitat used for nesting variable, but dense willow growth is typical. Occurs widely on migration.	**No Potential.** The Project Area does not contain riparian habitat with thick continuous cover required to support this species.	No further actions are recommended for this species.
yellow-headed blackbird *Xanthocephalus xanthocephalus*	SSC	Summer resident. Breeds colonially in freshwater emergent wetlands with dense vegetation and deep water, often along borders of lakes or ponds. Requires abundant large insects such as dragonflies; nesting is timed for maximum emergence of insect prey.	**No Potential.** The Project Area does not contain any water bodies with suitable surrounding marsh.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Reptiles and Amphibians				
Pacific (western) pond turtle *Actinemys marmorata*	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches with aquatic vegetation. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks, and suitable upland habitat (sandy banks or grassy open fields) for egg-laying.	**No Potential.** The Project Area does not contain aquatic habitat to support this species.	No further actions are recommended for this species.
foothill yellow-legged frog *Rana boylii*	SSC	Found in or near rocky streams in a variety of habitats. Prefers partly-shaded, shallow streams and riffles with a rocky substrate; requires at least some cobble-sized substrate for egg-laying. Needs at least 15 weeks to attain metamorphosis. Feeds on both aquatic and terrestrial invertebrates.	**No Potential.** While this species is known to the region, the Project Area does not contain any aquatic habitat to support the species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
San Francisco garter snake *Thamnophis sirtalis tetrataenia*	FE, SE, CFP, RP	Vicinity of freshwater marshes, ponds and slow moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	**No Potential.** The Project Area is not within the vicinity of any suitable water bodies that this species would occur near.	No further actions are recommended for this species.
California giant salamander *Dicamptodon ensatus*	SSC	Occurs in the north-central Coast Ranges. Moist coniferous and mixed forests are typical habitat; also uses woodland and chaparral. Adults are terrestrial and fossorial, breeding in cold, permanent or semi-permanent streams. Larvae usually remain aquatic for over a year.	**No Potential.** The Project Area does not contain any forested habitat or aquatic features that this species would utilize.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
California red-legged frog *Rana draytonii*	FT, SSC, RP	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Associated with quiet perennial to intermittent ponds, stream pools and wetlands. Prefers shorelines with extensive vegetation. Disperses through upland habitats after rains.	**No Potential.** This species has been documented within one mile of the Project Area, however that occurrence was associated with a canal separated from the Project Area by dense residential development and two sets of railroad tracks (CNDDB 2019). The Project Area does not contain any water bodies, nor are there water bodies within the typical dispersal distance for the species. Therefore there is no potential that this species would occur within the Project Area at any time.	No further actions are recommended for this species.
Fishes				
tidewater goby *Eucyclogobius newberryi*	FE, SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches; requires fairly still but not stagnant water and high oxygen levels.	**No Potential.** No aquatic habitat is present to support this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
hardhead *Mylopharodon conocephalus*	SSC, FS sensitive	Found in low to mid-elevation streams in the Sacramento-San Joaquin drainage; also occurs in the Russian River and tributaries. Favors clear, deep pools with sand-gravel-boulder bottoms and slow water velocity. Not found where exotic Centrarchids predominate.	**No Potential.** No aquatic habitat is present to support this species.	No further actions are recommended for this species.
steelhead - central CA coast DPS *Oncorhynchus mykiss irideus*	FT	Occurs from the Russian River south to Soquel Creek and Pajaro River. Also in San Francisco and San Pablo Bay Basins. Adults migrate upstream to spawn in cool, clear, well-oxygenated streams. Juveniles remain in fresh water for 1 or more years before migrating downstream to the ocean.	**No Potential.** No aquatic habitat is present to support this species.	No further actions are recommended for this species.

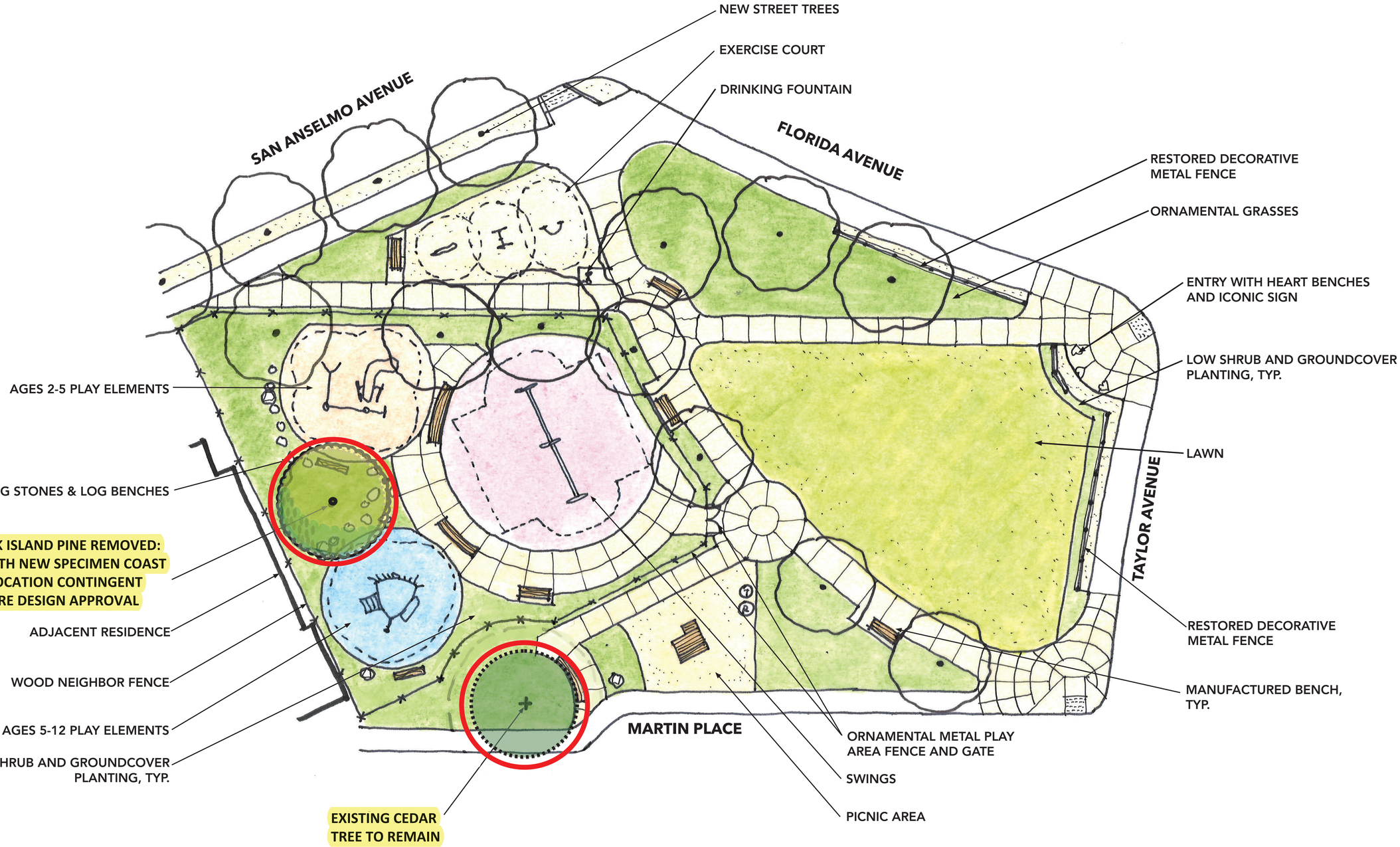
SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
longfin smelt *Spirinchus thaleichthys*	FC, ST, SSC	Euryhaline, nektonic and anadromous. Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15 to 30 ppt, but can be found in completely freshwater to almost pure seawater.	**No Potential.** No aquatic habitat is present to support this species.	No further actions are recommended for this species.
Delta smelt *Hypomesus transpacificus*	FT, SE, RP	Lives in the Sacramento-San Joaquin estuary in areas where salt and freshwater systems meet. Occurs seasonally in Suisun Bay, Carquinez Strait and San Pablo Bay. Seldom found at salinities > 10 ppt; most often at salinities < 2 ppt.	**No Potential.** No aquatic habitat is present to support this species.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Invertebrates				
western bumble bee *Bombus occidentalis*	SSI	Formerly common throughout much of western North America; populations from southern British Columbia to central California have nearly disappeared (Xerces 2015). Occurs in a wide variety of habitat types. Nests are constructed annually in pre-existing cavities, usually on the ground (e.g. mammal burrows). Many plant species are visited and pollinated.	**Unlikely**. No burrows or burrow surrogates were observed within the Project Area during the site visit.	No further actions are recommended for this species.
Mission blue butterfly *Icaricia icarioides missionensis*	FE, SSI, RP	Inhabits grasslands and coastal chaparral of the San Francisco peninsula and southern Marin County, but mostly found on San Bruno Mountain. Three larval host plants: *Lupinus albifrons*, *L. variicolor*, and *L. formosus*, of which *L. albifrons* is favored.	N**o Potential.** The Project Area does not contain grasslands or the coastal chaparral habitat that this species requires.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Myrtle's silverspot butterfly *Speyeria zerene myrtleae*	FE, RP, SSI	Restricted to the fog belt of northern Marin and southernmost Sonoma County, including the Point Reyes peninsula; extirpated from coastal San Mateo County. Occurs in coastal prairie, dunes, and grassland. Larval foodplant is typically *Viola adunca*. Adult flight season may range from late June to early September.	N**o Potential.** The Project Area is outside the range of this species.	No further actions are recommended for this species.
Bay checkerspot butterfly *Euphydryas editha bayensis*	FT, SSI, RP	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Orthocarpus densiflorus* and *O. purpurscens* are the secondary host plants.	N**o Potential.** The Project Area does not contain any host plants for this species, nor does it contain native grasslands.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
San Bruno elfin butterfly *Callophrys mossii bayensis*	FE, SSI	Limited to the vicinity of San Bruno Mountain, San Mateo County. Colonies are located on in rocky outcrops and cliffs in coastal scrub habitat on steep, north-facing slopes within the fog belt. Species range is tied to the distribution of the larval host plant, Sedum spathulifolium.	N**o Potential.** The Project Area is outside the range of this species.	No further actions are recommended for this species.
monarch butterfly *Danaus plexippus*	SSI	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, Monterey cypress), with nectar and water sources nearby.	**Unlikely.** No suitable roost trees are present within the Project Area.	No further actions are recommended for this species.

SPECIES	STATUS*	HABITAT REQUIREMENTS	POTENTIAL TO OCCUR IN THE PROJECT AREA	DISCUSSION
Callippe silverspot butterfly *Speyeria callippe callippe*	FE, SSI	Two populations in San Bruno mountain and the Cordelia Hills are recognized. Hostplant is Viola pedunculata, which is found on serpentine soils. Most adults found on east-facing slopes; males congregate on hilltops in search of females.	**No Potential.** The Project Area is not within the area of the two known populations for this species.	No further actions are recommended for this species.



ATTACHMENT 3

0 10′ 20′

NORTH

NORFOLK ISLAND PINE REMOVED

MIG

MARCH 2019 - Rev. Sept 2019

FLORIDA AVENUE PARK
San Bruno, California