Lower Milagra Ridge
Golden Gate National Recreation Area

# Milagra Battery Trail and Signs

## DRAFT CEQA/NEPA Environmental Compliance

### Categorical Exemption/Categorical Exclusion

November 2015

Lower Milagra Ridge, Pacifica, CA

# Milagra Battery Trail and Signs Project Description

## A. PROJECT INFORMATION AND SUMMARY

| | |
|---|---|
| **Park Name:** | Golden Gate National Recreation Area (GGNRA) |
| **Project Title:** | Milagra Battery Trail and Signs, Milagra Ridge |
| **PEPC Project Number:** | 32170 |
| **Project Location:** | City of Pacifica |
| **County, State**: | San Mateo, California |
| **NPS Project Leader:** | Barnaby Fisher |
| **Administrative Record Location:** | GGNRA Environmental Compliance Office Fort Mason, Bldg. 101, San Francisco, CA 94123 |
| **Administrative Record Contact:** | Steve Ortega |
| **CEQA Lead Agency**: | City of Pacifica |
| **CEQA Contact**: | Kathryn Farbstein, Assistant Planner |

This document includes an environmental impact assessment regarding reconstruction of the Milagra Battery Trail, which would consolidate existing social trails into one established route. The background and project description are provided to support NEPA and CEQA compliance and to provide a determination that the project meets the conditions of a Categorical Exemption and a Categorical Exclusion. The purpose of the project is to construct a sustainable multi-use trail that connects the Connemara neighborhood in Pacifica to Milagra Ridge. The project would complete a segment of the Bay Area Ridge Trail and protect endangered species habitat.

This impact assessment reviews and estimates the potential effects from construction and operation activities for applicable physical, natural, and cultural environmental resources as listed in **Table 1**. Less than significant effects are anticipated for geologic resources, rare or unusual vegetation, unique or important wildlife, species of special concern, recreation resources, visitor experience and aesthetic resources, gateway communities, geohazards, air quality, soundscapes, water quality, non-native species, long-term management of resources or land/resource productivity and other important environmental resources. No major impacts regarding the Mandatory Criteria listed in **Table 2** would result from the project. Compliance with applicable laws, regulations, and implementation of Best Management Practices (BMPs) and conservation measures will limit the project's effect on the environment.

In 2007, the United States Fish and Wildlife Service (USFWS) issued a biological opinion (BO) for the effects of the Connemara Conservation Easement Dedication and Development Project on Milagra Ridge in Pacifica on the endangered mission blue butterfly, San Bruno elfin butterfly, and San Francisco garter snake; and the threatened California red-legged frog. As described above, the proposed trail alignment runs through the Connemara Conservation Easement. Thus, the BO includes conservation measures (such as requiring a biological monitor who is knowledgeable about the protected species to be present during the trail construction) that are required to be implemented during trail construction. In 2015 based on new information collected

since the initial consultation, the NPS reinitiated consultation with the USFWS to modify the project description and several conservation measures. As of November 2015, this approval is still pending, however if the USFWS adopts the proposed revisions, the updated avoidance and mitigation measures would be implemented as conditions required under this project.

## B. PURPOSE AND NEED

### B.1 Purpose

The purpose of the project is to consolidate existing social trails into a sustainable multi-use trail that connects the Connemara neighborhood in Pacifica to Milagra Ridge.

### B.2 Need

The project would decommission existing social trails; complete a segment of the Bay Area Ridge Trail; and protect endangered species habitat.

## C. NEPA/CEQA COMPLIANCE

The City of Pacifica is the lead agency under CEQA for the Categorical Exemption and the National Park Service is the lead agency under NEPA for the Categorical Exclusion. This document provides the background and project description to support NEPA and CEQA compliance and to provide a determination that the project meets the conditions of a Categorical Exemption and a Categorical Exclusion. Following the public review period, public comments will be reviewed and incorporated as necessary into this document. Approval of the Categorical Exemption and Exclusion would occur after the public review period and incorporated through the NEPA Categorical Exclusion determination (Attachment A) and the CEQA Categorical Exemption determination (Attachment C)

## D. PROJECT DESCRIPTION

The Milagra Battery Trail project (the project) would consolidate an existing network of braided informal trails into one formal multi-use trail in Lower Milagra Ridge between the Connemara condominium development and the National Park Service (NPS) property and trail system on Milagra Ridge in the City of Pacifica. Established in 1987, Milagra Ridge is a 245-acre parcel of land in the Golden Gate National Recreation Area (GGNRA). It is a windswept coastal ridge known for its views of the Pacific Ocean and scrub-covered ridgeline that provides habitat to several special-status species. The location for the proposed consolidated trail is along the southern edge of a 34-acre Conservation Easement Dedication Property established in 2007 as a result of an agreement between O'Brien homes and the NPS (**Figure 1**). The project would also complete a segment of the Bay Area Ridge Trail. The Bay Area Ridge Trail, a 350-mile trail system around the San Francisco Bay region, designated this alignment as their preferred route through Pacifica. An existing parking lot designated for public GGNRA access is located at the end of Connemara Drive, which currently provides access to the existing social trails and would continue to provide public access to the Milagra Battery Trail upon completion. Existing conditions in the project area include: several social trails that are steep and deeply eroded; several informal entry and exit trails to neighborhoods and the adjacent Oceana High School; and illegal dirt bike jumps.


SOURCE: National Park Service 2015

Milagra Battery Trail . 150519

**Figure 1**
Project Location

The project is located in the "dedication parcel", a component of the Connemara Conservation Easement Dedication and Development Project that was donated to the NPS to be protected in perpetuity as permanent open space under a conservation easement. Provisions for trail access were included in the development project. The 34-acre parcel provides preservation, restoration

and management of habitat for several federally listed species. In 2007, the USFWS issued a Biological Opinion (BO) in response to the NPS request for consultation on the Connemara Conservation Easement Dedication and Development Project. The resources in the dedication parcel are managed by the GGNRA to provide habitat for the mission blue butterfly, San Bruno elfin butterfly, San Francisco garter snake, and/or California red-legged frog.

The BO states that the conservation easement would allow restoration and management activities associated with the dedication parcel to include the construction and maintenance of an appropriate and sustainable trail alignment. The alignment would connect a trailhead parking area and trails constructed on the eastern end of the development parcel to the existing NPS lands on Milagra Ridge. Signs and fencing would also be installed to manage visitor use and protect listed species habitat. The BO also states that the conceptual trail alignment would involve the utilization and upgrade of existing former unpaved roads and social trails that currently exist on the dedication parcel. The final trail alignment would be developed to minimize impacts to larval host plants for the mission blue butterfly and other sensitive habitat areas, minimize future maintenance requirements, minimize erosion, and discourage shortcutting by trail users. Further, the BO acknowledges that trail work may be accomplished with trail dozers, mini-excavators, material haulers, Bobcat loaders and various types of handheld power tools and equipment.

In the BO, the USFWS concurred with the NPS that the Connemara Conservation Easement Dedication and Development Project is not likely to adversely affect the endangered Myrtle's silverspot butterfly (*Speyeria zerene myrtleae*), nor is it likely to adversely affect five endangered plant species: robust spineflower (*Chorizanthe robusta* var. *robusta*), beach layia (*Layia carnosa*), San Francisco lessingia (*Lessingia germanorum*), white-rayed pentachaeta (*Pentachaeta bellidiflora*), and Hickmans cinquefoil (*Potentilla hickmanii*). The USFWS also concluded that the Connemara project was not likely to jeopardize the continued existence of the mission blue butterfly (*Plebejus icarioides missionensis*), San Bruno elfin butterfly, San Francisco garter snake, or California red-legged frog.

The project proposes to construct a multi-use trail that is approximately 2,000-feet long and five to six-feet wide. The trail would follow the existing social trail routes for the most part, except in sections that require a lower grade. The existing switchback section of the trail currently has a 20-30% running grade. The realigned trail would follow the contour of the topography and result in a maximum running slope of 10-15% grade and maximum cross slope of 5%. The trail would be unpaved and constructed with base rock and compacted aggregate trail tread. Rock walls would be used to raise trail tread to a sustainable grade. The new alignment would reduce long-term maintenance costs, reduce overall trail running grade, create a single defined route providing access from Pacifica neighborhoods to Milagra Ridge, and provide a potential for volunteer opportunities through restoration of some of the trails that were decommissioned. In addition, the

alignment would avoid sensitive species and habitat areas, and post and cable fencing would be installed along the trail to reduce off trail use. Fencing would be installed to block off decommissioned social trails to prevent further use.

Following trail reconstruction, volunteer and staff support would assist with revegetating the trail corridor and the NPS trail crew would continue to maintain the trail's conditions periodically.

### D.1 General Project Construction

GGNRA has an existing trail crew responsible for maintaining park trails, who would construct the trail alignment. Construction is expected to commence in February 2016. The trail crew for this project would consist of staff and interns, typically working Monday through Thursday between 7:00 a.m. and 5:30 p.m. They would likely start on the mid and upper sections of the property and work downhill toward the parking lot at 100-200-foot increments at a time over a four to six-month period, with construction expected to be completed by October 2016.

As noted, the trail would be five to six-feet wide and during construction the disturbance area would extend approximately five feet on either side of the route.

To minimize the project footprint, staging would only occur in the following locations: 1) in the existing public parking lot at the end of Connemara Drive; 2) in the middle portion of the property half-way up the trail; and 3) at the property line at the top of the proposed trail alignment (along Milagra Battery Road) (**Figure 2**). No earthwork or vegetation clearing would be required to prepare staging areas. Staging areas would be restored and revegetated post project.

Construction methods would include hand tools, a mini-excavator, a small off-road vehicle to transport aggregate tail tread and other construction materials, and a tracked skid-steer. Other vehicles to be used during construction include two six-pack trucks to transport the trail crew and one dump-truck each day to be parked in the Connemara Drive parking lot. Once per week a 25-ton quarry truck would deliver tread material. Excavated soil would be reused in the new trail alignment and no soil would be exported from the site. However, a section of asphalt would be removed from the proposed trail alignment and placed in a dumpster located in the Connemara Drive parking lot, for removal by Recology.

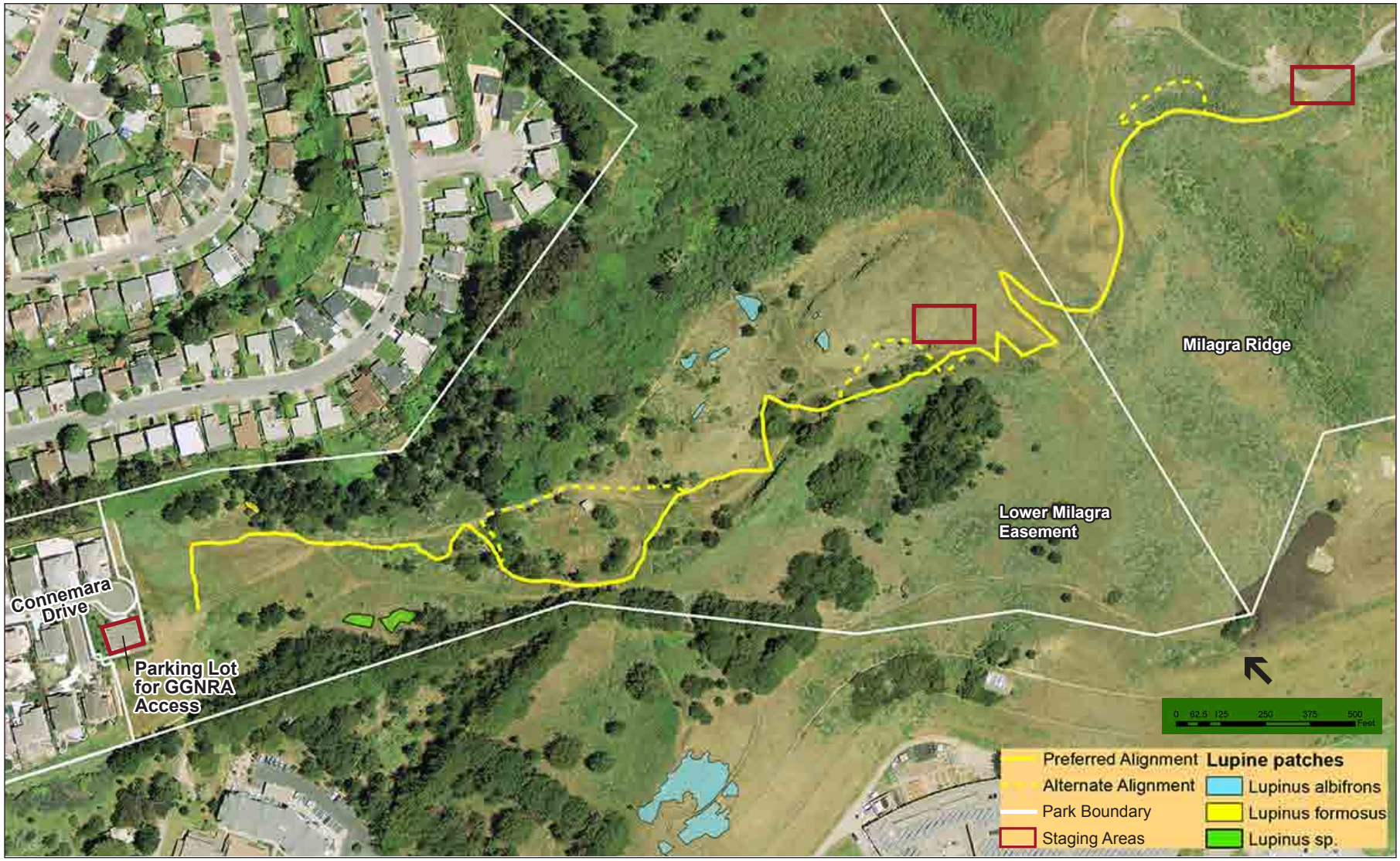
### D. 2 Avoidance and Minimization Measures as Part of the Project

As stipulated in the National Park Service 5X Project Review Conditions (August 13, 2015) the project shall meet all Conditions and Conservation measures under the 2007 USFWS Biological Opinion. The park is currently in discussion with USFWS to modify some biological monitoring requirements based on more recent survey information.

Additional measures to avoid and minimize effects on special status species include the following:

- Preservation of Existing Vegetation

  Whenever possible, all existing vegetation will be preserved. The construction crew would work with the habitat stewardship crew to restore impacted vegetation where possible.




Milagra Battery Trail . 150519

SOURCE: National Park Service 2015

**Figure 2**
Milagra Battery Trail Alignment

- Water Pollution Control

  A Construction General Permit and Stormwater Pollution Prevention Plan (SWPPP) is required for projects that disturb one acre of land. Because the project area of disturbance is less than one acre, a SWPPP is not required for this project. To avoid and minimize effects on environmental resources during construction, the NPS trail crew will control and prevent spills, store materials, and manage stock piles and waste in accordance with standard construction site BMPs as specified in the Under-an-Acre Pollution Prevention Plan (UPPP).

- Public Safety Measures

  Fencing would be installed to close off work areas as the trail construction proceeds. Signs notifying visitors of trail work ahead will be placed at the upper edge of the trail at the junction with Milagra Battery Road and at the base of the trail at the parking area on Connemara Drive.

- Nesting Bird Surveys

  The Migratory Bird Treaty Act (MBTA; 16 USC §703) prohibits taking, killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior.

  Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 of the code prohibits take, possession, or destruction of any birds in the orders Falconiformes (hawks) or Strigiformes (owls), or of their nests and eggs. Migratory non-game birds are protected under Section 3800, while other specified birds are protected under Section 3505.

  The disruption of nesting migratory or native birds is not permitted under the federal MBTA or the California Fish and Game Code, as it could constitute unauthorized take. Thus, the loss of any active nest by, for example, removing a tree or shrub containing an active nest or causing visual or noise disturbance which leads to nest abandonment, must be avoided under federal and California law.

  A biological monitor will be onsite to conduct nesting bird surveys prior to the removal of any trees (alive or dead) and limbing of trees.

  - Construction would occur outside of bird nesting season (January 1 – July 31) to the extent possible. If construction occurs during the nesting bird season, a pre-construction survey for protected nesting birds must be conducted within one week of the start of project activity. If protected birds are found to be nesting within 20 ft (for ground nesting birds), 50 ft (non ground-nesting passerines), or 250 ft (raptors) of the project area, a construction buffer will be established to prevent disturbance to the nesting birds until the nest is no longer active (e.g., due to fledging, predation, etc.).
  - Prior to removal of trees, whether dead or alive, during the bird nesting season (January 1 – July 31), the qualified biologist will conduct a nesting bird survey, within one day of tree removal to determine whether any active nests, including cavity nests, are present. If nesting activity is observed, tree removal will be postponed until the nest is no longer active. If no nesting activity is observed, the

qualified biologist will monitor tree removal in case presence of nesting birds becomes apparent.

- Prior to entry into project area, machinery used in land clearance and trail building shall be cleaned of vegetation/seeds sourced from other work sites.
- To the full extent possible, no native plants will be removed from the project impact area. Native plants that must be removed will be replanted whenever feasible. Debris and uprooted non-native vegetation shall be bagged and off-hauled. No dumping of non-native vegetation shall occur on the project site.

- The following measures shall be implemented should ground disturbing activities result in the inadvertent discovery of an archeological resource or human remains:
  - Prior to construction, a training session on the recognition of the types of archeological resources that could be encountered and the procedures to be followed if they are found shall be presented to project construction personnel by a qualified professional archeologist. If prehistoric or historic-period archeological resources are encountered, all construction activities within 50 feet shall halt.
  - The qualified archeologist shall inspect the find within 24 hours of discovery and consult with the NPS, the City, and the culturally affiliated Native American group or groups.
  - If the find is determined to be a historical resource according to CEQA Guidelines or a historic property that meets the National Register listing criteria at 36 CFR 60.4, the archeologist, in consultation with the NPS, the City, and the culturally affiliated Native American group shall determine whether preservation in place is feasible. This may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement.
  - If preservation in place is not feasible, NPS, the City, and the qualified archeologist shall prepare and implement an Archeological Research Design and Treatment Plan (ARDTP). The agencies and the qualified archeologist, agencies with jurisdiction in the location(s) of the discovered resource(s), and the culturally affiliated Native American group(s, if applicable) shall meet to determine the scope of the ARDTP. The ARDTP shall identify a program for the treatment and recovery of important scientific data contained within the portions of the archeological resources located within the Project Area of Potential Effects (APE); preserve any significant historical information obtained; and identify the scientific/historic research questions applicable to the resources, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions.
  - Treatment for most archeological resources shall consist of (but is not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource(s) to be impacted by the project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals. The results of the investigation shall be

documented in a technical report that provides a full artifact catalog, analysis of items collected, results of any special studies conducted, and interpretations of the resource(s) within a regional and local context. All technical documents shall be placed on file at the Northwest Information Center of the California Historical Resources Information System.

- The treatment of any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities shall comply with applicable state laws. Such treatment would include stopping work within 50 feet of the discovery and immediate notification of the County Coroner. In the event of the coroner's determination that the human remains are Native American, the coroner shall notify the Native American Heritage Commission, which would appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The qualified archeologist, the NPS, the City, and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. PRC Section 5097.98 allows 48 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the landowner of the property on which the discovery is made shall follow PRC Section 5097.98(b), which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

## E. NEPA ENVIRONMENTAL SCREENING FORM

Table 1 identifies the potential effects to resources in the project area. As indicated below, the following resource areas were determined to have "No Effect" because they would not be affected by the project or do not exist within the project area and are not discussed further: streamflow characteristics, marine or estuarine resources, floodplains or wetlands, land use, unique ecosystems, fish or fish habitat, archeological resources, prehistoric/historic structures, cultural landscapes, ethnographic resources, museum collections, socioeconomics, minority and low income populations, energy resources, other agency or tribal use plans or policies, resource conservation potential and sustainability. Topics with less than significant effects are described in more detail below the table.

**TABLE 1**
**RESOURCE EFFECTS TO CONSIDER**

| | Identify Potential Effects to the Following Physical, Natural, or Cultural Resources | No Effect | Less than Significant Effect | Data Needed to Determine / Notes |
|---|---|---|---|---|
| 1. | Geologic resources – soils, bedrock, streambeds, etc. | | X | Short-term effects related to construction ground disturbance. Excavated soil would be reused onsite to reconstruct the multi-use trail. Minimal excavation would be required up to a depth of less than two feet. There is no bedrock or other important geological resources in the area that could be affected. |
| 2. | From geohazards | | X | The project would not be susceptible to the effects of landslides or soil liquefaction due to the geography of the project site. |
| 3. | Air quality | | X | Air quality impacts would be short-term and temporary during construction activities and would not affect residential or other sensitive land uses. |
| 4. | Soundscapes | | X | Soundscape impacts would be short-term and temporary during construction activities and would not affect residential or other sensitive land uses. |
| 5. | Water quality and quantity | | X | With the implementation of standard construction site BMPs, impacts on water quality during construction will be minimized or prevented. |
| 6. | Streamflow characteristics | X | | There are no streams at or near the project site. The trail would be constructed in the same alignment as the existing social trails and would not impact any stream corridors. The project would not alter the course of a stream or waterway. |
| 7. | Marine or estuarine resources | X | | No marine or estuarine resources are within or near the project footprint. |
| 8. | Floodplains or wetlands | X | | No wetlands areas are within or near the project footprint. |
| 9. | Land use, including occupancy, income, values, ownership, type of use | X | | The project would not change or conflict with the existing land use of the project area. The existing use in the project area includes multiple informal trails which would be consolidated into one active multi-use trail. Provisions for a trail project were included in the conservation easement for the property. |
| 10. | Rare or unusual vegetation – old growth timber, riparian, alpine | | X | No old growth timber, riparian, or alpine vegetation is within or near the project footprint. There are is a moderate potential for other rare plant species to occur in the project area, see Table 3. |
| 11. | Species of special concern (plant or animal; state or federal listed or proposed for listing) of their habitat | | X | The 2007 BO concurred that actions within the conservation easement, including trail construction, would have no effect on the following federally listed and proposed species:<br>• Myrtle's silverspot butterfly (Speyeria zerene myrtleae)<br>• Robust spineflower (Chorizanthe robusta var. robusta)<br>• Beach layia (Layia carnosa)<br>• San Francisco lessingia (Lessingia germanorum)<br>• White rayed pentachaeta (Pentachaeta bellidiflora)<br>• Hickman's cinquefoil (Potentilla hickmanii)<br>The 2007 BO identified the following species that may be found in or near the project area, therefore, the project may affect, but is not likely to adversely affect, the following federally listed and proposed species, or their habitat:<br>• Mission blue butterfly (*Plebejus icarioides missionensis*)<br>• San Bruno elfin butterfly (*Callophrys mossii bayensis*)<br>• California red-legged frog (*Rana dratonii*)<br>• San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)<br>As described in Section D.2, general avoidance and conservation measures would be implemented to reduce potential effects on special-status species in the project area. |

**TABLE 1**
**RESOURCE EFFECTS TO CONSIDER**

| | Identify Potential Effects to the Following Physical, Natural, or Cultural Resources | No Effect | Less than Significant Effect | Data Needed to Determine / Notes |
|---|---|---|---|---|
| 12. | Unique ecosystems, biosphere reserves, World Heritage Sites | X | | Golden Gate National Recreation Area (GGNRA) is part of the Golden Gate Biosphere Reserve formed by UNESCO in 1998. The project would have a beneficial effect on the designation of this biosphere reserve because it would be promoting recreational access, however there would be no adverse effect. |
| 13. | Unique or important wildlife or wildlife habitat | | X | The project would have a less than significant effect on important wildlife habitat. The trail alignment has been planned to specifically avoid Mission blue butterfly larval food and adult nectar plants, which occur in the area. Host plants for San Bruno elfin butterfly have not been documented in the conservation easement. No critical habitat for the mission blue and San Bruno elfin butterflies and the San Francisco garter snake has been designated; therefore none would be adversely affected by the project. The project could have a less than significant effect on Mission blue butterfly, San Bruno elfin butterfly, California red-legged frog, or San Francisco garter snake. |
| 14. | Unique, essential or important fish or fish habitat | X | | No habitat occurs on or near the project site that would support unique, essential or important fish or fish habitat. |
| 15. | Introduce or promote non-native species (plant or animal) | | X | Standard BMPs will be implemented to reduce the likelihood that non-native species are introduced or promoted. |
| 16. | Recreation resources, including supply, demand, visitation, activities, etc. | | X | Access to the social trails within the project footprint would be restricted during construction. However, recreation access to the rest of Milagra Ridge would remain open and accessible to the public. Following completion of the project, recreation resources of the area would be improved by inclusion of trail materials and grades that meets NPS trail standards and improved connections to existing trail routes. |
| 17. | Visitor experience, aesthetic resources | | X | Construction noise and activities would result in short-term temporary effects to visitor experiences immediately around the construction area. Following completion of the project, visitor experience in the area would be improved by inclusion of safer trail surface and grades than the existing informal trails, and improved connections to existing trail routes. |
| 18. | Archeological resources | X | | No known archeological resources are within or near the proposed trail. The project is not anticipated to have an effect on archeological resources. Standard BMPs will be implemented in the event of an unanticipated discovery of an archeological resource. |
| 19. | Prehistoric/historic structures | X | | The proposed project would have No Adverse Effect to Historic Properties (including prehistoric/historic structures). Current recommendations from the Historic Resources Study for Golden Gate National Recreation Area San Mateo County (NPS, 2010) include appropriate signs and panels be installed at Milagra Ridge to interpret its history. |
| 20. | Cultural landscapes | X | | The proposed project would have No Adverse Effect to Historic Properties (including cultural landscapes). |
| 21. | Ethnographic resources | X | | No known ethnographic resources are within or near the proposed project. The project is not anticipated to have an effect on ethnographic resources. |

**TABLE 1**
**RESOURCE EFFECTS TO CONSIDER**

| | Identify Potential Effects to the Following Physical, Natural, or Cultural Resources | No Effect | Less than Significant Effect | Data Needed to Determine / Notes |
|---|---|---|---|---|
| 22. | Museum collections (objects, specimens, and archival and manuscript collections) | X | | There are no museums in the project footprint. |
| 23. | Socioeconomics, including employment, occupation, income changes, tax base, infrastructure | X | | The project is the consolidation of existing social trails and construction would be implemented by existing NPS employees, therefore there would be no effect on socioeconomics. |
| 24. | Minority and low income populations, ethnography, size, migration patterns, etc. | X | | There are no residents within the project area and construction traffic that could cross minority or low income neighborhoods while accessing the site would be negligible; therefore, no minority or low income populations would be affected. |
| 25. | Energy resources | X | | Minimal fuels and other energy resources would be required during construction; the project would not impact energy resources. |
| 26. | Other agency or tribal use plans or policies | X | | Construction would comply with the Native American Graves Protection and Repatriation Act (NAGPRA) if remains of Native American origin are discovered. |
| 27. | Resource, including energy, conservation potential, sustainability | X | | The project would not impact any energy resources directly. The project would have a beneficial impact on natural resources by consolidating multiple social trails into one sustainable multi-use trail. |
| 28. | Urban quality, gateway communities, etc. | | X | The project would have a temporary short-term effect on the Connemara neighborhood during construction due to the presence of construction equipment and staging area in the parking lot at the end of Connemara Drive. |
| 29. | Long-term management of resources or land/resource productivity | | X | The existing NPS trail crew would provide ongoing maintenance of the trail following construction. |
| 30. | Other important environmental resources (e.g., geothermal, paleontological resources)? | | X | Given the minimal ground disturbance for the proposed project, it is unlikely that the project would impact paleontological or geothermal resources, if any are within the project area. Impacts to other important environment resources are not known to exist in the area; however if present effects would be less than significant based on the amount of disturbance. |

### E.1 Geologic Resources-soils, Bedrock, Streambeds, etc.

Construction-related ground disturbance could result in temporary erosion of geologic material. Please refer to the "Water Quality or Quantity" discussion below regarding implementation of BMPs which will reduce the discharge of sediment and other construction materials. There is no bedrock or streambed in the project area.

All excavated soil would be reused on site for the reconstruction of the trail. No soil would be exported from the site. The primary geologic unit of the site is green schist facies, or greenstone, of the Franciscan formation. The soils of the site are ideally suited for trail construction because they are skeletal (gravelly) in nature and fairly cohesive. This means the soils are somewhat

protected from pluvial (rainsplash) detachment, and have an inherent resistance to the erosive force of surface runoff (Watershed Science, 2000). Construction would require the use of certain hazardous materials such as fuels and oils. Inadvertent release of large quantities of these materials into the environment could adversely impact soil, surface waters, or groundwater quality. However, regulatory agency oversight which requires standard BMPs would reduce the risk associated with hazardous materials used during construction to a less than significant level. The NPS would use construction best management practices typically implemented as part of its construction activities to minimize the potential adverse effects of the project to groundwater, soils, air, aesthetics, traffic, and noise. Therefore, the project would result in less than significant impacts to geological resources.

### E.2 Geohazards

The project site is located in a seismically active region; however, there are no known faults that cross the project area. The San Andreas is the closest active fault to the project area and transects the northeastern tip of the City of Pacifica. The potential for liquifaction is very low in the project area (Pacifica, 2015). In addition, the slope failure threat has been mapped in the project area as not landslide prone (Pacifica, 2015).

### E.3 Air quality

The Bay Area Air Quality Management District (BAAQMD) has developed thresholds for evaluating potential operational criteria air pollutant impacts from project implementation. These thresholds are based on the minimum size for projects that BAAQMD considers capable of producing air quality impacts. The BAAQMD threshold level for a project is equivalent to the generation of over 5,000 new vehicle trips per day, based on the latest version of the CalEEMod model. As the proposed project would not increase vehicular trips to the site, nor generate any permanent stationary source or area source emissions, the project vehicle trip generation from the improvements proposed at the project site would be well below the BAAQMD minimum threshold for potential air quality impacts.

Emissions of dust and air pollutants during project construction are expected to be minimal and short in duration and would not occur near sensitive receptors. Standard BMPs for dust control will be implemented. Emissions estimated with the CalEEMod model indicate that construction emissions would be 3.5 pounds per day of nitrogen oxides, 0.4 pounds per day of reactive organic gases and 0.2 pounds per day of exhaust particulate matter, all of which would be less than the 54 pound per day BAAQMD-developed significance threshold for construction related exhaust. Impacts to air quality would only occur during construction activities, which would be short-term and temporary.

### E.4 Soundscapes

The proposed project could result in a temporary increase in noise during project construction. Construction times would adhere to the City Code for noise regulation. The nearest sensitive receptors are the residents on Connemara Drive and Oceana High School. Noise from construction projects is regulated under the City of Pacifica Municipal Code (Title 5, Chapter 10), which prohibits the use of pile drivers or other similar equipment between the hours of 8:00 p.m. and 7:00 a.m.

Because the proposed project is not expected to result in an increase in public use, noise generated under the proposed project would be essentially the same as that generated under current conditions at the park. Noise impacts to the surrounding soundscape would only occur during construction activities and would be short-term and temporary.

### E.5 Water quality and quantity

No construction activities would occur within or near an active creek channel. Construction would require the use of certain hazardous materials such as fuels and oils. Inadvertent release of large quantities of these materials into the environment could adversely impact soil, surface waters, or groundwater quality. However, regulatory agency oversight which requires standard BMPs would reduce the risk associated with hazardous materials used during construction. Erosion control BMPs (e.g., straw wattle placement, water diversion and trenches) would also be implemented during construction to prevent excess runoff during the rainy season. The trail would be designed to minimize and lengthen the grade in order to minimize the effects of runoff and control erosion.

### E.6 Streamflow characteristics

No construction activities would occur within or near active creek channel or Waters of the U.S.

### E.7 Marine or estuarine resources

There are no marine or estuarine resources within or near the project area.

### E.8 Floodplains or wetlands

There are no floodplains or wetlands within or near the project area.

### E.9 Land use, including occupancy, income values, ownership, type of use

The project would not change or conflict with the existing land use of the project area. The existing use in the project area includes recreational use of multiple informal trails. The project would allow this land use to continue by consolidating the braided social trails into one active multi-use trail. The project area is located on the southern edge of a 34 acre conservation easement between the Connemara condominiums and NPS property established in 2007 as part of an agreement between the developer and NPS.

This project would also be consistent with the City of Pacifica's General Plan Open Space Element policies:

> 1. Retain open space which preserves natural resources, protects visual amenities, prevents inappropriate development, provides for the managed use of resources, and protects the public health and safety.
>
> 2. Provide outdoor recreation in local parks, open space, and school playgrounds in keeping with the need, scale and character of the City and of each neighborhood.
>
> 4. Promote communitywide links to open space and recreation facilities which do not abuse the open space resource or threaten public safety.

### E.10 Rare or unusual vegetation – old growth timber, riparian, alpine

No old growth timber, riparian, or alpine vegetation is within or near the project footprint and there is a low to moderate potential for other rare or unusual vegetation

### E.11 Species of Special Concern (Plant or Animal; State or Federally Listed or Proposed for Listing or Their Habitat)

In the 2007 Biological Opinion issued for the Connemara Conservation Easement Dedication, the USFWS concurred with the NPS that the following threatened and endangered species would not likely be adversely affected because these species are not likely to occur in the conservation easement area.

- Myrtle's silverspot butterfly (*Speyeria zerene myrtleae*) – FE
- Robust spineflower (*Chorizanthe robusta var. robusta)* – FE
- Beach layia (*Layia carnosa)* – CE/FE
- San Francisco lessingia (*Lessingia germanorum)* – CE/FE
- White rayed pentachaeta *(Pentachaeta bellidiflora*) – CE/FE
- Hickman's cinquefoil (*Potentilla hickmanii)* – FE/CE

The 2007 Biological Opinion found that actions within the conservation easement, including trail construction, may adversely affect the following state and federally listed species:

- Mission blue butterfly (*Plebejus icarioides missionensis*) - FE
- San Bruno elfin butterfly (*Callophrys mossii bayensis*) - FE
- California red-legged frog (*Rana draytonii*) – FT
- San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) – SE/ FE

The implementation of conservation measures required under the BO and described in Section D.2 would minimize many potential adverse effects.

Mission blue butterflies were observed as early as 1992 on Milagra Ridge above the project site. Surveys of NPS lands on Milagra Ridge have been ongoing since 1995 and have confirmed that the butterflies and their habitat occur on Milagra Ridge, adjacent to the dedication parcel. In 2007, reconnaissance-level surveys identified *Lupinus albifrons* on the dedication parcel. The USFWS states in the Connemara BO that the mission blue butterfly is reasonably certain to occur on the dedication parcel "because of the biology and ecology of the animal, the presence of suitable habitat on these parcels and adjacent lands, as well as the recent observations of this listed species within the [conservation easement]" (USFWS, 2007). The proposed trail alignment avoids mission blue butterfly larval food and adult nectar plants: silver or bush lupine (*Lupinus albifrons*), summer lupine (*L. formosus*), many-colored lupine (*L. variicolor*), and perhaps other *Lupinus* spp. In addition, any larval food or adult nectar plants for this species would be marked with pin flags and/or fencing. Thus, this project would not jeopardize the continued existence of, the Mission blue butterfly in the conservation easement.

The San Bruno elfin butterfly was first discovered on Milagra Ridge in the mid-1980s. The GGNPC initiated a monitoring program on Milagra Ridge in 1999 and San Bruno elfin butterfly adults and larvae have been observed there. During reconnaissance-level plant surveys in 2007, stonecrop was not observed; however, the USFWS believes that the dedication parcel could support stonecrop, as well as adult nectar plants, for the San Bruno elfin butterfly. The USFWS states in the Connemara BO that the San Bruno elfin butterfly is reasonably certain to occur on the dedication parcel "because of the biology and ecology of the animal, the presence of suitable habitat within the [conservation easement], as well as the recent observations of this listed species within the [conservation easement]" (USFWS 2007). There is a reported absence of the larval food and adult nectar plants in the conservation easement. Thus, this project would not jeopardize the continued existence of the San Bruno elfin butterfly in the conservation easement.

California red-legged frogs (CRLF) breed and lay eggs on emergent vegetation in "permanent ponds, pools along streams, springs, marshes, lakes and reservoirs" (Stebbins, 2012). The species is known to travel over one mile from breeding areas; upland dispersal of metamorphs is essential for finding foraging sites and avoiding predation by adult CRLF and other predators at breeding sites. California red-legged frogs are most likely to move through dry upland habitat during the rainy season and limit their movements to moist drainages during the dry summer months (Stebbins, 2012). Adult and metamorph CRLF may also estivate in rodent burrows, cracks, and moist debris piles between the time when breeding habitat dries out and the fall-winter rainy season commences.

During a survey conducted by ESA on September 3, 2015, groups of about a dozen small (approximately 3 inch) burrows were observed in two areas along the new trail alignment, which could potentially provide *refugia* for estivating CRLF or dispersing juveniles; however, the latter are likely to disperse with the onset of rains when trail building is planned to be completed. A California Natural Diversity Database (CNDDB) search of the South San Francisco and Montara Mountain USGS quadrants indicates that CRLF is presumed extant in multiple locations within approximately one mile of the project area. In the Connemara BO, the USFWS concluded that CRLF "is reasonably certain to occur within the Connemara…dedication parcel because of the biology and ecology of the animal, the presence of suitable habitat in and adjacent to (the) parcel, as well as the recent observation of this listed species in habitat areas contiguous with (this) parcel" (USFWS 2007). The presence of a biological monitor during trail construction; the requirement that only a 10(a)1(A) permitted biologist handle/relocate this species; the very limited number of burrows and other *refugia* in the conservation easement; flagging and avoidance of burrows; and, removal of vegetation per section 3.2.1 of the Biological Assessment would minimize the effect of the project and would not jeopardize the continued existence of, the CRLF in the project area.

A CNDDB search of the South San Francisco and Montara Mountain USGS quads indicate that San Francisco garter snake (SFGS) may be present in the project area (specific location of observations are not provided for this species). The San Francisco garter snake is a feeding specialist, hunting amphibians extensively in aquatic habitats. This species is also known to use open, upland habitat for basking and hibernation in rodent burrows; they have been found to use upland habitat within several hundred yards of their aquatic foraging habitat (USFWS, 2015). In

2014, the NPS conducted ten surveys around the Milagra Ridge pond and adjacent grassland habitat under sunny and warm conditions without observing any garter snakes. During the course of these surveys, trapping activities specifically for SFGS in 2005 (Swaim Biological, 2007), and two decades of natural resources management at Milagra Ridge (including intensive monitoring for breeding California red-legged frogs inside the pond), SFGS has never been detected. Therefore, the NPS believes that SFGS are not likely to be present at Milagra Ridge at this time,

The presence of a biological monitor during trail construction, as required under the 2007 BO; the requirement that only a 10(a)1(A) permitted biologist handle/relocate this species; the very limited number of burrows and other *refugia* in the [conservation easement]; flagging and avoidance of burrows; and, removal of vegetation per section 3.2.1 of the Biological Assessment, suggest that this project would have a less than significant effect on, and would not jeopardize the continued existence of, SFGS in the project area.

As described in the 2007 BO and in Section D.2, avoidance and minimization measures are required to reduce potential effects on special-status species in the project impact area. These measures include minimizing the area of impact; conducting worker environmental awareness training for construction workers; conducting preconstruction surveys; establishing nest buffers for nesting birds, if necessary; flagging burrows; preservation and relocation of native plant species, especially special status butterfly larval host plants on or near the project site; on-site biological monitoring; and construction site BMPs.

### E.12 Unique ecosystems, biosphere reserves, World Heritage Sites

Golden Gate National Recreation Area (GGNRA) is part of the Golden Gate Biosphere Reserve formed by UNESCO in 1998. The project would have a beneficial effect on the designation of this biosphere reserve because it would be promoting recreational access; there would be no adverse effect.

### E.13 Unique or important wildlife or wildlife habitat

The project would have less than significant effects on important wildlife habitat. The trail alignment has been planned to specifically avoid Mission blue butterfly larval food and adult nectar plants, which occur in the area. Host plants for San Bruno elfin butterfly have not been documented in the conservation easement. No critical habitat for the mission blue and San Bruno elfin butterflies and the San Francisco garter snake has been designated; therefore none would be adversely affected by the project. The project could impact Mission blue butterfly, San Bruno elfin butterfly, California red-legged frog, and San Francisco garter snake, as described above. Please refer to the discussion under Section E.11, above.

### E.14 Unique or Important Fish or Fish Habitat

The project would have no effect on unique or important fish or fish habitat because no such habitat is found within or near the project area.

### E.15 Introduce or promote non-native species (plant or animal)

Standard construction site BMPs will be implemented to reduce the likelihood that non-native species are introduced or promoted in compliance with Executive Order (EO) 13112.

### E.16 Recreation resources, including supply, demand, visitation, activities, etc.

Milagra Ridge is a 245-acre park unit of the GGNRA. The GGNRA manages the park with the goal of protecting and restoring natural habitat, while still providing public access. Access to the park is from a parking lot at the end of College Drive north of Sharp Park Road. The project would consolidate the existing unimproved trails and enhance connectivity with other ridge trails in the vicinity, including the Sweeney Ridge trail, a segment of the Bay Area Ridge Trail, which extends from the Portola Gate at the boundary of the Peninsula Watershed in the south to Milagra Ridge in the north.

Trailheads with parking lots are at Milagra Ridge and Skyline College to the north and northeast, Shelldance Nursery off of Highway 1 to the west and Sneath Lane off of Skyline Boulevard to the east. There is a trailhead with no parking at the top of Fassler Avenue. Milagra Ridge has a three-quarter mile hiking trail on paved road and/or dirt trail. Access to the trails is from a parking lot at the end of the College Drive extension north of Sharp Park Road.

Existing visitor use data has not been collected at Milagra Ridge; anecdotally this park unit is primarily used by local residents. The NPS does not expect the visitor use to increase as a result of this project. The existing multiple braided social trails in the project area are already used extensively by local recreationists, bikers and students from the adjacent Oceana High School. The social trails are steep and deeply eroded and there are several informal entry/exit trails to adjacent neighborhoods and the school. The beneficial effects of the new trail alignment include improved wayfinding for hikers, reduced grade, improved surface tread and safer conditions on the existing steep and eroded hillside.

Access to the project area would be temporarily restricted during construction. However, recreation access to the rest of Milagra Ridge would remain open and accessible to the public.

### E.17 Visitor experience, aesthetic resources

Construction activities would result in short-term temporary impacts to visitor experiences immediately around the construction area and a short-term impact to the aesthetic character of the project site due to the presence of construction equipment and temporary fencing. The project would have beneficial effects to visitor experience by improving access to Milagra Ridge and replacing the steep social trails in the conservation easement.

### E.18 Archeological resources

The Cultural Resources Survey Report (CRSR) completed for the proposed project defined an Area of Potential Effect (APE), which is the area of direct impact for the project including areas of ground disturbance, staging, access, and work areas. The archeological APE included a 100-foot-wide buffer on either side of the proposed 5- to 6-foot wide trail alignment to accommodate access and work areas. The CRSR included background research and a surface survey to identify potential archeological resources (ESA, 2015). Results from the archival search at the Northwest Information Center (NWIC) of the California Historical Resources Information System indicate that five previous cultural resources studies have been conducted within the 1-mile records search radius. These studies include archeological surface and subsurface investigations, primarily south

of Milagra Ridge and along the coastline. There are no studies on file at the NWIC that indicate the APE has been previously surveyed by an archeologist.

Background research indicates that no previously recorded archeological resources are located within the proposed project APE. Archeologist N.C. Nelson noted two (2) prehistoric shellmounds in the vicinity of Pacifica during his 1907–1908 survey of the San Francisco Bay Area. These sites have not been re-recorded during subsequent survey efforts in the area and their precise locations are not currently known.

A Secretary of the Interior-qualified archeologist completed a surface survey of the APE on August 18, 2015. The steep rocky slopes were intensively surveyed in narrow 5-meter-wide zigzag transects where feasible. The survey did not identify prehistoric archeological resources, including midden soil, artifacts, or other evidence of past human use and occupation. Additionally, the survey did not identify historic-era archeological resources, such as refuse concentrations or other deposits, as well as features such as fence lines, ditches, or other water conveyance features. There is no evidence that archeological resources are within the proposed project APE. The project is not anticipated to have an effect on archeological resources.

Based on the background research, survey results, previous disturbance, and environmental framework, there appears to be a low potential for the discovery of buried or unknown archeological resources or human remains. While unlikely, the inadvertent discovery of archeological resources cannot be entirely discounted. Standard BMPs as described in Section D.2 will be implemented should ground disturbing activities result in the inadvertent discovery of an archeological resource.

#### E.19 Prehistoric/historic structures

See E.18 above. No evidence of prehistoric resources is within in the proposed project APE.

Two historic-era structures (Fire Control Station BS Construction #129 and a historic-era paved road segment) are within the proposed project APE. While individually not considered a significant resource (i.e. a historic property) and despite having been moved from its original location at Devil's Slide, Fire Control Station BS Construction #129 is considered a contributing resource to the San Francisco Harbor Defenses National Historic Landmark District. For management purposes, NPS considers this contributing resource to be a historic property.

The remains of the historic-era paved road in the APE are associated with Nike Site SF-51. Previous documentation (NPS, 2010) has not considered the road as a contributing resource to the San Francisco Harbor Defenses National Historic Landmark District. The road lacks integrity of design, materials, workmanship, and association. The upper portion of the road is entirely removed and the lower portion is nearly incomplete. The road is not considered a historic property and no additional consideration is necessary for the proposed project.

The proposed project would have No Adverse Effect to Historic Properties. There would not be a direct effect on a historic property—B6S6 Construction #129. Construction of a new trail over an existing trail route would not cause a visual change that would be considered adverse. As the

structure is immediately adjacent to the proposed trail, indirect effects could include increased visitation; however this would also not be considered an adverse effect.

#### E.20 Cultural landscapes

See E.19 above. The proposed project would have No Adverse Effect to Historic Properties (including cultural landscapes). Construction of a new trail over an existing trail route would not cause a visual change that would be considered adverse.

#### E.21 Ethnographic resources

See E.18 above. Background research completed for the CRSR did not result in the identification of ethnographic resources within the APE. The site was surveyed by NPS Archaeologist Peter Gavette on September 18, 2013, for a separate project to remove invasive plants. It was determined that no further stipulations were required for the project area beyond NPS standard requirements for projects involving ground disturbance. The project is not anticipated to have an effect on ethnographic resources.

#### E.22 Museum collections (objects, specimens, and archival and manuscript collections)

There are no museums in the project footprint, nor anticipation of retrieval of archival objects or specimens in the project area, therefore there would be no effect.

#### E.23 Socioeconomics, including employment, occupation, income changes, tax base, infrastructure

The project is the consolidation of existing social trails and construction would be implemented by existing NPS employees, therefore there would be no effect on socioeconomics.

#### E.24 Minority and low income populations, ethnography, size, migration patterns, etc.

There are no residents within the project area and construction traffic that could cross minority or low income neighborhoods while accessing the site would be negligible; therefore, no minority or low income populations would be affected.

#### E.25 Energy resources

Minimal fuels and other energy resources would be required during construction; the project would not impact energy resources.

#### E.26 Other agency or tribal use plans or policies

Although it is unlikely that human remains could be encountered during excavation in the project area, in the event human remains of Native American origin are discovered, the project would comply with the Native American Graves Protection and Repatriation Act (NAGPRA), which specifies the procedures federal agencies must follow when burials of Native American origin are found on federal land. If human remains of Native American origin are discovered during construction-related ground-disturbing activities, standard BMPs as described in Section D.2 will be implemented to comply with NAGPRA regulations.

#### E.27 Resource, including energy, conservation potential, sustainability

Construction activities would consolidate existing informal social trails into a formalized trail. Construction impacts would be temporary and short-term. The project would result in a beneficial impact to long-term resource conservation by reducing the effects on biological and cultural

resources from informal trail use. Minimal fuels and other energy resources would be required during construction; the project would not impact energy resources.

#### E.28 Urban quality, gateway communities, etc.

The project would have a temporary short-term effect on the Connemara neighborhood during construction due to the presence of construction equipment and staging area in the GGNRA parking lot at the end of Connemara Drive. Due to the presence of staging and equipment access the parking lot would be closed to the public throughout the entire project construction period. The width of Connemara Drive varies from about 19 to 21 feet (excluding the extra width where on-street parking spaces are provided), which is sufficient to safely accommodate the relatively low volume of traffic. While there would be a temporary, intermittent, and incremental increase in traffic due to the presence of construction vehicles at the site during construction, the short-term effects on traffic flow and safety would be minimal. The project is not expected to result in any permanent increases in traffic or use of on-street parking spaces.

#### E.29 Long-term management of resources or land/resource productivity

The existing NPS trail crew would provide ongoing maintenance of the trail following construction. Volunteer programs that conduct habitat restoration activities at Milagra Ridge would contribute to the native plant restoration and non-native plant removal in the project area following the trail construction.

#### E.30 Other important environmental resources (e.g., geothermal, paleontological resources)?

Given the minimal ground disturbance for the proposed project, it is unlikely that the project would impact paleontological resources. If paleontological resources are observed during construction, work would cease within 100 feet of the find until a qualified paleontologist can evaluate the discovery.

### F. NEPA MANDATORY CRITERIA

For the purpose of interpreting these procedures within the NPS, any action that has the potential to violate the NPS Organic Act by impairing park resources or values would constitute an action that triggers the DOI exception for actions that threaten to violate a federal law for protection of the environment. Table 2 below assesses the project's potential to impair park resources.

**TABLE 2**
**NEPA MANDATORY CRITERIA**

| Mandatory Criteria: If implemented, would the proposal: | Yes | No | N/A | Comment or Data Needed to Determine |
|---|---|---|---|---|
| A. Have significant impacts on public health or safety? | | X | | During construction signage and fencing would be installed to inform visitors of the trail construction and prevent any public interaction with the construction site, avoiding a safety risk. The long-term benefit of the project would increase the public safety on the trail system at Milagra Ridge by providing a formal graded trail for public use rather than the informal existing trails that do not meet trail standards and pose an existing hazard. |
| B. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990); floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas? | | X | | The project would have less than significant impacts to these resource areas: Please refer to the discussion in Section E. There are no wild and scenic rivers, national natural landmarks, sole or principal drinking water aquifers or prime farmlands in or near the project area. |
| C. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources (NEPA section 102(2)(E))? | | X | | The project does not concern alternative use of an available resource. The project would not have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources. |
| D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks? | | X | | No significant impacts are anticipated and the project includes commonly used construction equipment and routine construction activities and therefore, unknown risks are not anticipated. |
| E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects? | | X | | The project is a routine activity to consolidate existing social trails and is not something new that would establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects. |
| F. Have a direct relationship to other actions with individually insignificant, but cumulatively significant, environmental effects? | | X | | There are no other actions with which this project would result in a cumulatively significant environmental effect. |
| G. Have significant impacts on properties listed or eligible for listing on the National Register of Historic Places, as determined by either the bureau or office? | | X | | There are no significant impacts anticipated to the proposed San Francisco Harbor Defenses National Historic Landmark District, which is eligible for listing in the National Register of Historic Places. There are no other historic properties within the project APE. |

**TABLE 2**
**NEPA MANDATORY CRITERIA**

| Mandatory Criteria: If implemented, would the proposal: | | Yes | No | N/A | Comment or Data Needed to Determine |
|---|---|---|---|---|---|
| H. | Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species? | | X | | There are no significant impacts anticipated to the listed species or designated critical habitat for these species. The 2007 USFWS Biological Opinion determined that critical habitat designated for the threatened California red-legged frog would not be affected because the proposed action would not occur within any critical habitat unit for this species. |
| I. | Violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment? | | X | | The project would not violate a federal law, or a state, local, or tribal law or requirement imposed for the protection of the environment. |
| J. | Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)? | | X | | There are no residents at the project site. Construction traffic that could cross minority or low income neighborhoods while accessing the site would be negligible. Therefore, no minority or low income populations would be affected. |
| K. | Limit access to and ceremonial use of Indian sacred sites on federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007)? | | X | | No ethnographic resources were identified in the project area. No impacts to ethnographic resources are anticipated. |
| L. | Contribute to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and EO 13112)? | | X | | Implementation of standard BMPs are required that reduce the likelihood that non-native species are introduced or promoted. Therefore, the project is unlikely to contribute to the introduction, existence, or spread of noxious weeds or non-native invasive species or promote the introduction, growth or expansion of such species. |

## G. IMPACT ASSESSMENT: BIOLOGICAL RESOURCES

### G.1 Biological Opinion

As described above, the proposed trail alignment runs through the Connemara Conservation Easement. In 2007, the USFWS issued a BO for the effects of the Connemara Conservation Easement Dedication and Development Project on Milagra Ridge in Pacifica on the endangered mission blue butterfly, San Bruno elfin butterfly, and San Francisco garter snake; and the threatened California red-legged frog. The BO includes conservation measures to be implemented during trail construction. In 2015 based on new information collected since the initial consultation, the NPS reinitiated consultation with the USFWS to modify the project description and several conservation measures. As of November 2015, this approval is still pending, however

if the USFWS adopts the proposed revisions, the updated avoidance and mitigation measures would be implemented upon approval of this project.

## G.2 Biological Resources

The following section provides background for the biological resources existing setting. The project area contains northern coastal scrub and annual grasslands habitat. The following habitat descriptions come from the *Pacifica General Plan Environmental Impact Report* (City of Pacifica, 2015).

*Northern coastal scrub*

Northern coastal scrub habitat is dominated by Coyote brush (*Baccharis pilularis* ssp. *consanguinea*) or California sagebrush (*Artemisia californica*) depending on slope aspect. North facing slopes support a greater diversity of shrub species and canopy cover than south facing slopes. Other species present in northern coastal shrub habitats include the seaside woolly sunflower (*Eriophyllum staechadifolium*), arroyo willow (*Salix lasiolepis*), California blackberry (*Rubus ursinus*), California bee plant (*Scrophularia californica*), yarrow (*Achillea millefolium*), cudweed (*Gnaphalium* sp.), and blueblossom (*Ceanothus thyrsiflorus*).

Coastal scrub habitat, often interspersed with other habitats, provides foraging and nesting habitat for species that are attracted to edges of plant communities. Bird species that use the scrub habitat include bushtits (*Psaltriparus minimus*), wrentits (*Chamaea fasciata*), California quail (*Callipepla californica*), California towhee (*Melozone crissalis*), white-crowned sparrow (*Zonotrichia leucophrys*), and California thrasher (*Toxostoma redivivum*). Flowering scrub vegetation (e.g., *Ceanothus* spp.) attracts nectar drinkers such as Anna's hummingbird (*Calypte anna*). Mammals, including striped skunk (*Mephitis mephitis*), may use this habitat for protection and foraging grounds. Reptiles and small mammals that occur within scrub habitats include western fence lizard (*Sceloporus occidentalis*), brush rabbit (*Sylvilagus bachmani*), Botta's pocket gopher (*Thomomys bottae*), and deer mouse. Small mammals attract predators such as coyote (*Canis latrans*), bobcat (*Lynx rufus*), and gray fox (*Urocyon cinereoargenteus*).

Special-status animals that may use northern coastal scrub around Pacifica include merlins (*Falco columbarius*), dusky-footed woodrat (*Neotoma fuscipes*), Mission blue butterfly (*Plebejus icarioides missionensis*), and San Bruno elfin butterfly (*Callophrys mossii bayensis*). Special-status plants with the potential to occur include: Pacific manzanita (*Arctostaphylos pacifica*), Presidio manzanita (*A. montana* ssp. *ravenii*), San Bruno manzanita (*A. imbricata*), San Francisco lessingia (*Lessingia germanorum*), Choris' popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*), Davidson's bush-mallow (*Malacothamnus davidsonii*), fragrant fritillary (*Fritillaria liliacea*), Kellogg's horkelia (*Horkelia cuneata* ssp. *sericea*), Montara manzanita (*A. montaraensis*), Oregon polemonium (*Polemonium carneum*), pale yellow hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), San Francisco campion (*Silene verecunda*), San Francisco collinsia (*Collinsia multicolor*), and San Francisco gumplant (*Grindelia hirsutula*).

*Annual grasslands*

Annual grasslands, also present in the project area, occur in a mosaic pattern with coastal scrub and are dominated by non-native annual grass species and a variety of other non-native weeds. Common dominants of grasslands include ripgut brome (*Bromus diandrus*), rattail fescue (*Festuca myuros*), and wild oat (*Avena barbata*). Associated forbs include filaree (*Erodium botrys*), sweet clover (*Melilotus indicus*), plantain (*Plantago lanceolata*), and wild radish (*Raphanus sativus*). Weedy species include foxtail (*Hordeum murinum* ssp. *leporinum*), Italian ryegrass (*Festuca perennis*), French broom (*Genista monspessulana*), pampas grass (*Cortaderia selloana*), cape ivy (*Delairea odorata*), Bermuda buttercup (*Oxalis pes-caprae*), black mustard (*Brassica nigra*), and sweet alyssum (*Lobularia maritima*). Native species include wild iris (*Iris douglasiana*), blue-eyed grass (*Sisyrinchium bellum*), and California poppy (*Eschscholzia californica*).

Grasslands attract reptiles and amphibians, such as western fence lizard (*Sceloporus occidentalis*), common garter snake (*Thamnophis sirtalis*), northern alligator lizard (*Elgaria coerulea*), gopher snake (*Pituophis catenifer*), and western rattlesnake (*Crotalis viridis*). Bird species commonly found in this community include California quail (*Callipepla californica*), mourning dove (*Zenaida macroura*), Brewer's blackbird (*Euphagus cyanocephalus*), robin (*Turdus migratorius*), American goldfinch (*Carduelis tristis*), western meadowlark (*Sturnella neglecta*), song sparrow (*Melospiza melodia*), and red-winged blackbird (*Agelaius phoeniceus*). Annual grasslands are important foraging grounds for aerial and ground-foraging insect eaters such as Myotis bat species and pallid bats (*Antrozous pallidus*). Mammals such as coyote (*Canis latrans*), black-tailed deer (*Odocoileus hemionus columbianus*), California ground squirrel (*Spermophilus beecheyi*), black-tailed jackrabbit (*Lepus californicus*), deer mouse *(Peromyscus maniculatus*), California meadow vole (*Microtus californicus*), and Botta's pocket gopher (*Thomomys bottae*) may browse and forage on grasslands in Pacifica. Small rodents attract raptors (birds of prey) including red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*B. lineatus*), American kestrel (*Falco sparverius*), great horned owl (*Bubo virginianus*), turkey vulture (*Cathartes aura*), and white-tailed kite (*Elanus leucurus*). In urban situations, grassland patches tend to support more disturbance tolerant animals adapted to survive in impacted environments. These include eastern fox squirrels (*Sciurus niger*), striped skunks (*Mephitis mephitis*), raccoon (*Procyon lotor*), feral and domestic dogs (*Canis lupus familiaris*), feral and domestic cats (*Felis catus*), rats, and mice.

Special-status species that have the potential to occur in grassland habitats around Pacifica include the Mission blue butterfly (*Plebejus icarioides missionensis*), San Bruno elfin butterfly (*Callophrys mossii bayensis*), Crystal Springs fountain thistle (*Cirsium fontinale* var. *fontinale*), Marin western flax (*Hesperolinon congestum*), San Mateo thorn-mint (*Acanthomintha duttonii*), white-rayed pentachaeta (*Pentachaeta bellidiflora*), Crystal Springs lessingia (*Lessingia arachnoidea*), pappose tarplant (*Centromadia parryi* ssp. *parryi*), and San Francisco owl's clover (*Triphysaria floribunda*).

The California Department of Fish and Game's California Natural Diversity Data Base (CNDDB) was reviewed for the presence of sensitive species in the project vicinity (USGS quadrangles for

South San Francisco and Montara Mountain) (CNDDB, 2015). The sensitive species with potential to occur within the project site or vicinity are presented below in Tables 3 and 4.

**TABLE 3**
**SPECIAL-STATUS PLANT SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State \|Status | CRPR Ranking | Habitat Description / Blooming Period | Potential to Occur in the Study Area |
|---|---|---|---|---|---|
| Plant Species Listed or Proposed for Listing | | | | | |
| Franciscan manzanita<br>*Arctostaphylos franciscana* | FE | -- | 1B.1 | Open, rocky, serpentine outcrops in chaparral.<br>February – April | **Low.** No serpentine habitat present, site is well outside known range |
| San Bruno Mountain manzanita<br>*Arctostaphylos imbricata* | -- | CE | 1B.1 | Chaparral and coastal scrub, usually on sandstone outcrops.<br>February – May | **Low.** Regional occurrences are restricted to San Bruno Mountain and the Santa Cruz Mountains. |
| Presidio manzanita<br>*Arctostaphylos montana* ssp. *ravenii* | FE | CE | 1B.1 | Open, rocky, serpentine slopes in chaparral, coastal scrub, and coastal prairie.<br>February – March | **Low.** No serpentine habitat present, site is well outside known range. |
| Pacific manzanita<br>*Arctostaphylos pacifica* | -- | CE | 1B.2 | Coastal scrub and chaparral.<br>February – April | **Low.** Regional occurrences are restricted to San Bruno Mountain |
| Robust spineflower<br>*Chorizanthe robusta* var. *robusta* | FE | -- | 1B.1 | Scrub areas, sandy terraces and bluffs or loose sand.<br>April –September | **Low.** The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| San Mateo woolly sunflower<br>*Eriophyllum latilobum* | FE | CE | 1B.1 | Sparsely wooded, rocky or grassy slopes in the mixed evergreen forest/coast live oak woodland. | **Low.** No suitable habitat present. |
| Beach layia<br>*Layia carnosa* | FE | CE | 1B.1 | Sand dunes.<br>March – July | **Low**. The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| San Francisco lessingia<br>*Lessingia germanorum* | FE | CE | 1B.1 | Coastal scrub, sandy soils free of competing species.<br>July – November | **Low.** The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| White rayed pentachaeta<br>*Pentachaeta bellidiflora* | FE | CE | 1B.1 | Open, dry, rocky slopes and grassy areas, usually on serpentine.<br>March – May | **Low.** The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| Hickman's cinquefoil<br>*Potentilla hickmanii* | FE | CE | 1B.1 | Coastal bluff scrub. | **Low.** The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| Serpentine Adobe sanicle<br>*Sanicula maritima* | -- | Rare | 1B.1 | Moist clay or ultramafic soil in chaparral, coastal prairie, meadows, seeps, and valley and foothill grassland.<br>February – May | **Low.** No serpentine habitat present. |
| Showy Indian clover<br>*Trifolium amoenum* | FE | -- | 1B.1 | Valley grassland and wetland and riparian areas. Affinity to serpentine soils.<br>April – June | **Low.** No serpentine habitat present. |

**TABLE 3**
**SPECIAL-STATUS PLANT SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State \|Status | CRPR Ranking | Habitat Description / Blooming Period | Potential to Occur in the Study Area |
|---|---|---|---|---|---|
| CNPS California Rare Plant Ranked Species | | | | | |
| Franciscan onion<br>*Allium peninsulare* var. *franciscanum* | -- | -- | 1B.2 | Clay, volcanic, or serpentine substrate in valley and foothill grassland and cismontane woodland.<br>May - June | **Low.** No serpentine habitat present. |
| Bent-flowered fiddleneck<br>*Amsinckia lunaris* | -- | -- | 1B.2 | Coastal bluff scrub, cismontane woodland, and valley and foothill grassland.<br>March – June | **Moderate.** Suitable habitat in scrub and grassland may be present. |
| Montara manzanita<br>*Arctostaphylos montaraensis* | -- | -- | 1B.2 | Slopes and ridges in chaparral and coastal scrub.<br>January – March | **Low.** Regional occurrences are restricted to San Bruno Mountain and mountains west of San Mateo. |
| Bristly sedge<br>*Carex comosa* | -- | -- | 2B.1 | Lake margins, marshes, swamps, coastal prairie, and valley and foothill grasslands.<br>May – September | **Low.** No suitable habitat present. |
| Pappose tarplant<br>*Centromadia parryi* ssp. *parryi* | -- | -- | 1B.2 | Chaparral, coastal prairie, meadows, seeps, coastal salt marshes and swamps, and vernally mesic, often alkaline, valley and foothill grasslands.<br>May – November | **Low.** No suitable habitat present. |
| San Francisco spineflower<br>*Chorizanthe cuspidata* var. *cuspidata* | -- | -- | 1B.2 | Sandy terraces and slopes of coastal bluff scrub, coastal dunes, coastal prairie and coastal scrub.<br>April – July | **Low.** Limited to sandy openings in coastal scrub and dune scrub below 250 meters. |
| Franciscan thistle<br>*Cirsium andrewsii* | -- | -- | 1B.2 | Coastal bluff scrub, coastal prairie, coastal mesic scrub, and broadleaf upland forest; sometimes on serpentine soils; often associated with seeps.<br>March – July | **Low.** No suitable habitat present. |
| Compact cobwebby thistle<br>*Cirsium occidentale* var. *compactum* | -- | -- | 1B.2 | Coastal scrub, grassland, and dunes; often associated with seeps.<br>April – June | **Low.** No suitable habitat present. |
| San Francisco collinsia<br>*Collinsia multicolor* | -- | -- | 1B.2 | On humus-covered soil derived from mudstone in closed-cone coniferous forest and coastal scrub.<br>March – May | **Low.** No suitable habitat present. |
| Hillsborough chocolate lily<br>*Fritillaria biflora* var.*ineziana* | -- | -- | 1B.1 | Cismontane woodland and serpentinite valley and foothill grasslands.<br>March-April | **Low.** No serpentine habitat present. |

**TABLE 3**
**SPECIAL-STATUS PLANT SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State \|Status | CRPR Ranking | Habitat Description / Blooming Period | Potential to Occur in the Study Area |
|---|---|---|---|---|---|
| Fragrant fritillary<br>*Fritillaria liliacea* | -- | -- | 1B.2 | On clay, often serpentine derived soils in coastal scrub, grassland, and coastal prairie.<br>February – April | **Low.** No serpentine habitat present. |
| Blue coast gilia<br>*Gilia capitata* spp. *chamissonis* | -- | -- | 1B.1 | Coastal dunes and scrub.<br>April – July | **Moderate.** Suitable habitat in coastal scrub may be present. |
| San Francisco gumplant<br>*Grindelia hirsutula* var. *maritima* | -- | -- | 3.2 | Coastal scrub and grasslands.<br>June – September | **Moderate.** Suitable habitat in grassland is may be present. |
| Diablo helianthella<br>*Helianthella castanea* | -- | -- | 1B.2 | On rocky soils in broadleaf upland forest, cismontane woodland, coastal scrub, riparian woodland, and valley and foothill grassland.<br>March – June | **Moderate.** Suitable habitat in grassland is may be present. |
| Pale yellow hayfield tarplant<br>*Hemizonia congesta* ssp. *congesta* | -- | -- | 1B.2 | Grassy valleys and hills, often on fallow fields in coastal scrub.<br>April – November | **Moderate.** Suitable habitat in grassland is may be present. |
| Short-leaved evax<br>*Hesperevax sparsiflora* var. *brevifolia* | -- | -- | 1B.2 | Sandy bluffs and flats in coastal scrub and coastal dunes.<br>March – June | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Kellogg's horkelia<br>*Horkelia cuneata* var. *sericea* | -- | -- | 1B.1 | Coastal scrub, dunes, and openings of closed-cone coniferous forests.<br>February – July | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Point Reyes horkelia<br>*Horkelia marinensis* | -- | -- | 1B.2 | Sandy areas in coastal dunes, coastal prairies, and coastal scrub.<br>May –September | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Coast yellow leptosiphon<br>*Leptosiphon croceus* | -- | -- | 1B.1 | Coastal bluff scrub and coastal prairie.<br>April –May | **Low.** No suitable habitat present. |
| Rose leptosiphon<br>*Leptosiphon rosaceus* | -- | -- | 1B.1 | Coastal bluff scrub.<br>April – July | **Low.** No suitable habitat present. |
| Crystal Springs lessingia<br>*Lessingia arachnoidea* | -- | -- | 1B.2 | Cismontane woodland, coastal scrub, and serpentinite valley and foothill grasslands.<br>July –October | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Arcuate bush mallow<br>*Malacothamnus arcuatus* | -- | -- | 1B.2 | Gravelly alluvium in chaparral and cismontane woodland.<br>April – September | **Low.** No suitable habitat present. |

**TABLE 3**
**SPECIAL-STATUS PLANT SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State \|Status | CRPR Ranking | Habitat Description / Blooming Period | Potential to Occur in the Study Area |
|---|---|---|---|---|---|
| Choris' popcornflower<br>*Plagiobothrys chorisianus var. chorisianus* | -- | -- | 1B.2 | Coastal prairie, chaparral, coastal scrub.<br>March – June | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Oregon polemonium<br>*Polemonium carneum* | -- | -- | 2B.2 | Coastal prairie, coastal scrub, lower montane coniferous forest.<br>April – September | **Moderate.** Suitable habitat in coastal scrub may be present. |
| San Francisco campion<br>*Silene verecunda* ssp. *verecunda* | -- | -- | 1B.2 | Mudstone, shale, or serpentine substrates in coastal scrub, coastal prairie, chaparral and valley and foothill grassland.<br>March – June | **Moderate.** Suitable habitat in coastal scrub may be present. |
| Coastal triquetrella<br>*Triquetrella californica* | -- | -- | 1B.2 | Coastal bluff and coastal scrub. (no blooming period – species is a moss) | **Moderate.** Suitable habitat in coastal scrub may be present. |
| San Francisco owl's clover<br>*Triphysaria floribunda* | -- | -- | 1B.2 | Coastal prairie, coastal scrub and valley and foothill grassland, usually on serpentine. .<br>April – June | **Moderate.** Suitable habitat in coastal scrub may be present. |

NOTES:

The "Potential for Effect" category is defined as follows:
High = Species is expected to occur and habitat meets species requirements.
Moderate = Habitat is only marginally suitable or is suitable but not within species geographic range.
Low = Habitat does not meet species requirements as currently understood in the scientific community.

STATUS CODES:
**Federal**:
FE = Listed as "endangered" under the federal Endangered Species Act
FT = Listed as "threatened" under the federal Endangered Species Act

**State:**
CE = Listed as "endangered" under the California Endangered Species Act
CT = Listed as "threatened" under the California Endangered Species Act
CSC = CDFW designated "species of special concern"
CFP = CDFW designated "fully protected"
SC = CDFW designated "candidate threatened"
WL = CDFW designated "watch list"

**California Rare Plant Rank (CRPR):**
Rank 1A = Plants presumed extirpated in California and either rare or extinct elsewhere.
Rank 1B = Plants rare, threatened, or endangered in California and elsewhere.
Rank 2A = Plants presumed extirpated in California, but more common elsewhere.
Rank 2B = Plants rare, threatened, or endangered in California, but more common elsewhere.
Rank 3 = Plants about which we need more information – a review list
Rank 4 = Plants of limited distribution – a watch list

An extension reflecting the level of threat to each species is appended to each rarity category as follows:
.1 – Seriously endangered in California.
.2 – Fairly endangered in California.
.3 – Not very endangered in California.

SOURCE: CNDDB, 2015; CNPS, 2015, City of Pacifica, 2015

**TABLE 4**
**SPECIAL-STATUS ANIMAL SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State Status | Habitat Description | Potential to Occur in the Study Area |
|---|---|---|---|---|
| Species Listed or Proposed for Listing | | | | |
| **Invertebrates** | | | | |
| San Bruno elfin butterfly<br>*Callophrys mossii bayensis* | FE | -- | Coastal scrub on rocky outcrops with broadleaf stonecrop (*Sedum spathulifolium*) | **High.** This species is known to occur on Milagra Ridge. |
| Monarch butterfly<br>*Danaus plexippus* | -- | * | Eucalyptus groves (wintering sites). | **Low.** No suitable habitat present in the project area |
| Bay checkerspot butterfly<br>*Euphydryas editha bayensis* | FT | -- | Serpentine grasslands. | **Low.** No suitable habitat present in the project area. |
| Mission blue butterfly<br>*Plebejus icarioides missionensis* | FE | -- | Grassland with *Lupinus albifrons, L. Formosa*, and *L. varicolor.* | **High.** This species is known to occur on Milagra Ridge. |
| Callippe silverspot butterfly<br>*Speyeria callippe callippe* | FE | -- | Found in native grasslands with *Viola pedunculata* as larval food plant. | **Low.** No suitable habitat present in the study area. |
| Myrtle's silverspot butterfly<br>*Speyeria zerene myrtleae* | FE | * | Larval food plant is *Viola adunca.* | **Low.** The host plant *Viola adunca* has not been observed during plant and butterfly surveys. The 2007 USFWS Biological Opinion concurred that the proposed action would not adversely affect this species. |
| **Reptiles** | | | | |
| San Francisco garter snake<br>*Thamnophis sirtalis tetrataenia* | FE | CE, CFP | Densely vegetated ponds near open hillsides with abundant small mammal burrows. | **Moderate.** There is no record of this species occurring at Milagra Ridge, however suitable is present. |
| **Amphibians** | | | | |
| California red-legged frog<br>*Rana draytonii* | FT | CSC | Freshwater ponds and slow streams with emergent vegetation for egg attachment. | **High.** No surveys for CRLF have been conducted in the project area, however they do exist on the adjacent parcels on Milagra Ridge and the project area provides suitable habitat. |
| **Birds** | | | | |
| Merlin<br>*Falco columbarius* | -- | §3503.5 | Most common on coastlines, open grasslands, savannahs, woodlands, lakes and wetlands. | **Moderate.** Winter in California between September and May. |
| **Mammals** | | | | |
| Pallid bat<br>*Antrozous pallidus* | -- | CSC | Prefers caves, crevices, hollow trees, or buildings in areas adjacent to open space for foraging. Associated with lower elevations in California. | **Low.** Roosting habitat may be available in hollow trees |
| Townsend's big-eared bat<br>*Corynorhinus townsendii* | -- | CSC, SC | Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings of rocky areas with caves or tunnels. Roosting sites limited. Extremely sensitive to human disturbance. | **Low.** No suitable habitat present in the study area. |

**TABLE 4**
**SPECIAL-STATUS ANIMAL SPECIES THAT MAY OCCUR IN THE STUDY AREA**

| Common Name<br>Scientific Name | Federal Status | State Status | Habitat Description | Potential to Occur in the Study Area |
|---|---|---|---|---|
| hoary bat<br>*Lasiurus cinereus* | -- | * | Prefers open 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. | **Low.** Roosting habitat may be available in tree cavities. |
| fringed myotis<br>*Myotis thysanodes* | -- | CSC | Common in drier woodlands, but may roost in buildings, rocks, trees and snags. | **Low.** Roosting habitat may be available in tree cavities. |
| big free-tailed bat<br>*Nyctinomops macrotis* | -- | CSC | Roost in crevices of rocks and cliff sides for nesting and occasionally in buildings and tree cavities. | **Low.** Roosting habitat may be available in tree cavities. |

NOTES:
The "Potential for Effect" category is defined as follows:
High = Species is expected to occur and habitat meets species requirements.
Moderate = Habitat is only marginally suitable or is suitable but not within species geographic range.
Low = Habitat does not meet species requirements as currently understood in the scientific community.

STATUS CODES:
**Federal**:
FE = Listed as "endangered" under the federal Endangered Species Act
FT = Listed as "threatened" under the federal Endangered Species Act

**State:**
CE = Listed as "endangered" under the California Endangered Species Act
CT = Listed as "threatened" under the California Endangered Species Act
CSC = California Department of Fish and Wildlife designated "species of special concern"
CFP = California Department of Fish and Wildlife designated "fully protected"
SC = California Department of Fish and Wildlife designated "candidate threatened"
WL = California Department of Fish and Wildlife designated "watch list"
§3503 = Eggs, Nests, and Nestlings Protected under Section 3503 of the California Fish and Game Code
§3503.5 = Eggs, Nests, and Nestlings of Falconiformes and Strigiformes Protected under Section 3503.5 of the CDFG Code
* = California special animal

**Other:**
Western Bat Working Group (WBWG):
Low = Stable population
Medium = Need more information about the species, possible threats, and protective actions to implement.
High = Imperiled or at high risk of imperilment.

SOURCE: CNDDB, 2015; CNPS, 2015, City of Pacifica, 2015

## References

Calflora, 2015. calflora.org, Accessed September 20, 2015.

California Department of Toxic Substances Control (DTSC), 2015, Envirostor Database, www.envirostor.dtsc.ca.gov/public, accessed May 28, 2015.

California Department of Transportation (Caltrans), 2015. California Scenic Highway Mapping System, dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed August 31, 2015.

California Native Plant Society (CNPS), 2015. Inventory of Rare and Endangered Plants for *San Francisco South* and *Montara Mountain* U.S. Geological Survey (USGS) 7.5-minute topographic quadrangles. rareplants.cnps.org, Accessed September 17, 2015.

California Natural Diversity Database (CNDDB), 2015. Rarefind version 5 query of the *San Francisco South* and *Montara Mountain* USGS 7.5-minute topographic quadrangles, Commercial Version. Accessed September 2, 2015.

City of Pacifica, *Pacifica General Plan Final Environmental Impact Report*, April 2015.

ESA, Milagra Battery Trail Project Cultural Resources Survey Report, September, 2015.

Holloway, Robert. Personal communication, September 30, 2015.

Stebbins, Robert C. and McGinnis, Samuel M., 2012. Field Guide to Amphibians and Reptiles of California. UC Press (Berkeley, Los Angeles, London).

Swaim Biological, Inc. June 20, 2007. Results of surveys for the San Francisco garter snake habitat improvement project at Milagra Ridge and Rancho Corral de Tierra for Golden Gate National Recreation Area, San Mateo County, California. Unpublished report prepared for Golden Gate National Recreation Area. 57 pp.

U.S. Fish and Wildlife Service, 2007. *Formal Consultation on the Connemara Conservation Easement Dedication and Development Project, City of Pacifica, San Mateo County, CA*, June 2007.

U.S. Fish and Wildlife Service, 2015. Endangered Species Account for San Francisco Garter Snake, fws.gov/sacramento/es_species/Accounts/Amphibians-Reptiles/es_sf-garter-snake.htm, accessed September 20, 2015.

Watershed Science, 2000. Proposed Trail Alignment for Pacific Crest Planned Development, Pacifica, California, June 2000.

The Xerces Society for Invertebrate Conservation, xerces.org/mission-blue, accessed September 20, 2015.

# Attachment A – NEPA Categorical Exclusion Memorandum

# Categorical Exclusion Form

**Project:** Milagra Battery Trail and Signs, Milagra Ridge
**PEPC Project Number:** 32170
**Description of Action (Project Description):**

The project proposes to formalize a series of existing braided social trails into a multi-use trail located on the southern edge of a 34 acre conservation easement between the Connemara condominiums and NPS property established in 2007 as part of an agreement between the developer and NPS. This project will address the need to consolidate social trails, complete a segment of the Bay Area Ridge Trail, and protect endangered species habitat. Rather than hiking use only as originally proposed in 2010, it is returning now as a multi-use trail with a revised alignment that connects the trailhead with the existing upper Milagra trail network. The formalized social trail would be called the Milagra Battery trail. The trail would be 5-6' wide with a granular compacted tread material. The project would include NPS trailhead and directional signage. The conservation easement also included set-asides for habitat restoration.

Residential construction is complete on the developed portion of the property and a public access trailhead has been established by the developer. It is now time to establish a preferred trail connection to the Milagra Ridge trail system for residents and the public that will protect habitat and establish a more sustainable pattern of use. An excerpt from the 2007 Biological Opinion describing the relevant actions is attached in PEPC. In the agreement with the developer, $25,000 was committed to implement a trail plan that was described in a June 2000 document from project consultant Watershed Science. This plan is attached in PEPC.

The project timeline up to this point has been: " 2007 NPS acquired an easement " 2007 NPS initiated FWS consultation o BO listed MBB, SBE, SFGS, CRLF " 2010 PR for scoping, hiking trail " 2013 Priority Conservation Area grant, 3:1 match " 2014 Bay Area Ridge Trail designation

Although the 2007 FWS BO lists San Francisco Garter Snakes, over 10 biological surveys have since been conducted without finding evidence of their presence. This begs the question as to what level of additional consultation with USFWS is required to complete the project. Christine FitzGerald, Acting Project Manager, has proposed to work with Steve Ortega, Environmental Protection Specialist, and Darren Fong, Aquatic Ecologist, to determine the best course of action.

Due to partial project funding from the state, CEQA compliance is also required. A Categorical Exemption is expected as the CEQA pathway.

Existing conditions on the site include: " Braided network of social trails " Existing social trails are steep and deeply eroded " Several informal entry/exit trails to neighborhoods and school " Illegal dirt bikes and jumps

The proposed trail specifications include: " 4-6 wide, multi-use trail " NPS wayfinding and regulatory signage " Post-and-cable fencing to protect sensitive habitat " Re-vegetation and erosion control " Trail construction February - June 2016

The lower switchback section of the trail currently runs at an old alignment of greater than a 20-30% running grade, and would be realigned to better follow the contour of the topography and to result in less than a 10-15% running grade.The upper switchback section currently is comprised of multiple alignments of a greater than 20-30% running grade , and would be realigned in switchbacks to result in less than a 10-15% running grade. Both alignments would use rock walls to raise trail tread to a sustainable height. The trail project would take 4-5 months to complete and outcomes would include: " ~2000 of hardened trail tread surface " New alignment will reduce long term maintenance costs and provide habitat protection " Overall reduction in trail running grade " A single defined route providing access from Pacifica neighborhoods to Milagra Ridge " Great potential for volunteer opportunities with nearby High School and local community

**Project Locations:**

**Location 1**

**County:** San Mateo **State:** CA

**Mitigation(s):**

- Project Managers will work with Barnaby Fisher, Acting Trails Supervisor to coordinate construction timeline given regulatory requirements; and Steve Ortega to work with environmental consultants on NEPA compliance.
- Project Managers will follow up with NPS Law Enforcement to determine enforcement rights within easement properties, and if desired and applicable, ensure that the Superintendent's Compendium is updated to allow enforcement of social trail closures.
- Project Managers will ensure accessibility requirements are incorporated in the parking and trailhead designs.
- Project Managers, Kirsten Holder and Christine FitzGerald, will work with Steve Ortega, Environmental Protection Specialist, and Darren Fong, Aquatic Ecologist, to ensure the project meets all Conditions and Conservation Measures under the 2007 USFWS Biological Opinion. If deviations from the BO are contemplated, reinitiation of consultation may be necessary.

**CE Citations:**

C.11 Minor trail relocation, development of compatible trail networks on logging roads or other established routes, and trail maintenance and repair.

C.17 Construction of fencing enclosures or boundary fencing posing no effect on wildlife migrations.

**Decision: I find that the action fits within the categorical exclusion above. Therefore, I am categorically excluding the described project from further NEPA analysis. No extraordinary circumstances apply.**

**Superintendent:** _____ **Date:** _____

# Attachment B – NHPA Approval and 5X Project Review

# United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

H4217 (GOGA-CRMM)

OCT - 5 2010

Memorandum

To: Steve Griswold, Landscape Architect, Golden Gate

From: General Superintendent, Golden Gate NRA

Subject: Completion of Certification for Project through Preservation Assessment Form (5X)
Project Title: (PEPC 32170) Milagra Battery Trail and Signs, Milagra Ridge, Golden Gate
Certification No.: GOGA-10-086

Enclosed is a copy of the signed Preservation Assessment Form (5X) indicating that the subject project has received Certification for compliance with the National Historic Preservation Act through our Park Programmatic Agreement. You may proceed with the project once you have met the other requirements of Project Review, and based on conformance with the following stipulations.

Stipulation(s):

1. Project Manager will not begin any ground disturbing activities until Park Archeologist (Leo Barker, 289-1891) has completed a site survey of the project site.

for
Frank Dean

Attachment

cc:
Jim Kren, Dan Collman, Jerry Scheumann, Facility Managers, Golden Gate, w/o att.
Environmental Protection Spec., Golden Gate, w/o att.

National Park Service
U.S. Department of the Interior

Golden Gate NRA
Date: 09/21/2010

# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON CULTURAL RESOURCES

## A. DESCRIPTION OF UNDERTAKING

1. Park: **Golden Gate NRA** Park district (optional):

2. Project Description:
a. Project Name **Milagra Battery Trail and Signs, Milagra Ridge** Date: **September 21, 2010** PEPC project ID no. **32170 (GOGA-10-086)**
b. Describe project and area of potential effects (as defined in 36 CFR 800.2[c])

**This project will establish a hiking trail on Lower Milagra Ridge, San Mateo County, between the condominium development (aka Connemara) and the NPS property and trail system on Milagra Ridge. The new trail will be called the Milagra Battery trail. This trail is located on the southern edge 34.02 acres of Conservation Easement Dedication Property established in 2007 as a result of an agreement between O'Brien homes and the NPS. Residential construction is now nearly complete on the developed portion of the property and a public access trailhead has been established by the developer. It is now time to establish a preferred trail connection to the Milagra Ridge trail system for residents and the public that will protect habitat and establish a more sustainable pattern of use. An excerpt from the 2007 Biological Opinion describing the relevant actions is attached. In the agreement with the developer, $25,000 was committed to implement a trail plan that was described in a June 2000 document from project consultant Watershed Science. This plan is attached. Keith Stegall (NPS trail supervisor) and Steve Griswold have interpreted this plan on the ground and layed out and mapped a preferred trail alignment with improvements. The trail will be hiking only, 5 feet in width and will include runs of timber box steps to ascend grades in excess of 15%. Project will include appropriate NPS trailhead and directional signage.**

**The conservation easement also included set-asides for habitat restoration and this trail alignment has been planned in consultation with the habitat restoration team.**

Milagra Ridge Cultural Landscape

3. Has the area of potential effects been surveyed to identify cultural resources?

__ No

__X__ Yes, Source or reference: **Milagra Ridge is an Identified Cultural Landscape within Golden Gate and is part of the Coastal Fortifications NHL.**

___ Check here if no known cultural resources will be affected. (If this is because area has been disturbed, please explain or attach additional information to show the disturbance was so extensive as to preclude intact cultural deposits.)

4. Potentially Affected Resource(s):

**Milagra Ridge Cultural Landscape**

5. The proposed action will: (check as many as apply)

__No__ Destroy, remove, or alter features/elements from a historic structure

__No__ Replace historic features/elements in kind

__No__ Add non-historic features/elements to a historic structure

__Yes__ Alter or remove features/elements of a historic setting or environment (inc. terrain)

__Yes__ Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape

__No__ Disturb, destroy, or make archeological resources inaccessible

__No__ Disturb, destroy, or make ethnographic resources inaccessible

__No__ Potentially affect presently unidentified cultural resources

__No__ Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

__No__ Involve a real property transaction (exchange, sale, or lease of land or structures)

__ Other (please specify)

6. Measures to prevent or minimize loss or impairment of historic/prehistoric properties:
(Remember that setting, location, and use may be relevant.)

~~No Assessment of Effect mitigations identified~~ BGH PM WILL NOT BEGIN GROUND DISTURBING ACTIVITIES UNTIL PARK ARCHEOLOGIST (LEO BARKER) HAS COMPLETED A SITE SURVEY.

7. Supporting Study Data:
(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

**Milagra Ridge is an Identified Cultural Landscape within Golden Gate and is part of the Coastal Fortifications NHL.**

8. Attachments:

[ X ] Maps [ ] Archeological survey, if applicable [ ] Drawings [ ] Specifications [ X ] Photographs
[ ] Scope of Work [ ] Site plan [ ] List of Materials [ ] Samples [ ] Other:

Prepared by **Bob Holloway** Date: **September 22, 2010** Title: **CRM Specialist (Curator)** Telephone: **415-561-4976**

**B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS**

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

---

[ **X** ] Archeologist
Name: **Leo Barker**
Date: **09/22/2010**
Comments: Leo R. Barker leo to survey for archaeology before construction starts.
*Check if project does not involve ground disturbance* [ ]
Assessment of Effect: __ No Historic Properties Affected ✓ No Adverse Effect __ Adverse Effect
__ Streamlined Review
Recommendations for conditions or stipulations:

---

[ **X** ] Historian
Name: **Stephen Haller**
Date: **09/22/2010**
Comments: **Reviewed as Admin Review 9/22/10.**

*Check if project does not involve ground disturbance* [ ]
Assessment of Effect: __ No Historic Properties Affected **X** No Adverse Effect __ Adverse Effect
__ Streamlined Review
Recommendations for conditions or stipulations:

Doc Method:
**Park Specific Programmatic Agreement**

---

[ **X** ] 106 Advisor
Name: **Bob Holloway**
Date: **09/22/2010**
Comments:

*Check if project does not involve ground disturbance* [ ]
Assessment of Effect: __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect
__ Streamlined Review
Recommendations for conditions or stipulations:

---

No Reviews From: **Curator, Historical Architect, Other Advisor, Anthropologist, Historical Landscape Architect**

---

**C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

1. Assessment of Effect:

_____ No Historic Properties Affected __X__ No Adverse Effect _____ Adverse Effect

2. Compliance requirements:

[ ] A. STANDARD 36 CFR PART 800 CONSULTATION
Further consultation under 36 CFR Part 800 is needed.

[ ] B. STREAMLINED REVIEW UNDER THE 2008 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

APPLICABLE STREAMLINED REVIEW Criteria
(Specify 1-16 of the list of streamlined review criteria.)

[ ] C. PLAN-RELATED UNDERTAKING

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 2008 Servicewide PA and 36 CFR Part 800.
Specify plan/EA/EIS: _____

[ **X** ] D. UNDERTAKING RELATED TO ANOTHER AGREEMENT
The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.
Specify: Golden Gate P.A.

[ ] E. COMPLIANCE REQUIREMENTS SATISFIED BY USE OF NEPA

Documentation is required for the preparation of an EA/FONSI or an EIS/ROD has been developed and used so as also to meet the requirements of 36 CFR 800.3 through 800.6

[ ] F. No Potential to Cause Effects [800.3(a)(1)]

[✓] G. STIPULATIONS/CONDITIONS

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

SEE BARKER SPECIALIST REVIEW. BGH

Recommended by Park Section 106 coordinator:

Name: **Bob Holloway**

Title: **CRM Specialist (Curator)**

Date: **9/22/10**

**D. SUPERINTENDENT'S APPROVAL**

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Name/Signature of Superintendent _____ for

Date: 10/5/10

**National Park Service**
**U.S. Department of the Interior**

Golden Gate National Recreation Area
Division of Planning
Fort Mason, Building 201
San Francisco, CA 94123
www.nps.gov/goga

# Memorandum

TO: General Superintendent, Golden Gate National Recreation Area

THROUGH: Deputy Superintendent

FROM: NEPA Team / Bob Holloway, Cultural Resources Section 106 Coordinator

DATE: August 13, 2015

SUBJECT: NEPA/NHPA Project Review/5X Committee Conditions/Recommendations

---

Included below are summaries of the proposals, discussion, and conditions or recommendations for projects presented at the **August 5, 2015 5X/Project Review Meeting.** The signature of the General or Deputy Superintendent, indicating approval or concurrence, is required for each project within the jurisdiction of Golden Gate National Recreation Area.

**3. FORM REVIEW/APPROVAL – 5X/PROJECT REVIEW**
**Milagra Battery Trail and Signs, Milagra Ridge, Barnaby Fisher and Kirsten Holder, PEPC 32170**

*See attachment for project description*

Discussion

- Steve Haller, Park Historian, asked for clarification on what endangered species are present. Christine FitzGerald, Acting Project Manager, replied Mission Blue butterfly, San Bruno elfin butterfly, San Francisco garter snake, and California red-legged frog. FitzGerald clarified that although San Francisco garter snakes were included in the USFWS BO, over 10 biologic surveys have been completed without finding evidence of their presence.
- Daphne Hatch, inquired if the rock walls would remain exposed. Barnaby Fisher, Acting Trails Supervisor, responded that yes, the rock walls would remain exposed, but that they would apply an oxidizer to the rock to better match the look of the surrounding environment. When applied, the oxidizer would turn the rock received from a local quarry from a white or blue hue to a tan or brown hue.
- Steve Ortega, asked if the closure of the surrounding social trails would be included in the Superintendent's Compendium to allow Law Enforcement Rangers to enforce the closures. FitzGerald responded that she was unsure whether the park could include easement areas in the compendium for enforcement. Hatch mentioned that the park has been doing enforcement in other easement areas. FitzGerald stated that she would follow up with Law Enforcement to inquire as to the recommended action.
- Hatch asked how the project proposed to keep trail users from cutting the switchbacks. Fisher answered that in part, the topological features would provide a significant psychological deterrent in many areas. Kirsten Holder, Project Manager and Landscape Architect, followed up that the project also proposes to install post and cable fencing in areas that attract trail cutting. Holder also mentioned that the trail has been planned to be sited away from sensitive habitat areas to further protect those resources.

- Ortega asked what outreach efforts were planned for the project. FitzGerald replied that an aggressive schedule for targeted outreach has been developed for implementation before the end of the year. Outreach would include Oceana High School, City of Pacifica, and neighborhood associations. Ortega followed up to ask if onsite construction signage would also be present prior to and during construction, and FitzGerald replied in the affirmative.
- Hatch asked what funding is available for revegetation, both in the trail corridor and otherwise. FitzGerald explained that although there is a plan for revegetation, due to the changes in the project from hiking only to multi-use, that funding would be tight. FitzGerald requested that additional Rec Fee funding be provided to support the trail project and associated revegetation. FitzGerald went on to mention that the Bay Area Ridge Trail would also try to assist as well.
- Carey Feierabend, Chief of Project Management, inquired what the timeline for construction is. Fisher said February 2016. Ortega asked if there was any flexibility in that. Fisher answered that yes, there could be flexibility by switching spring and summer projects if necessary per regulatory requirements.

5x Discussion

- This project is, in reality, formalizing an existing unofficial trail, not building a new trail, as characterized in the agenda description. Rehabilitation of existing trails are permitted under our Park PA, construction of new trails in historic districts are not.
- This project was reviewed and certified for Section 106 on 9/22/10 with a stipulation that PM will not begin any ground disturbing activities until Park Archeologist has completed a site survey of the project site. The proposed project area has since been surveyed for archeological resources and none were found to be present.
- Though Amy Hoke, who is away from the park this week, has been working with the IDT, it is uncertain if she has reviewed all of the proposed changes.
- **Subsequent to the 8/05/15 5x/Project Review Meeting, Amy reviewed and supports the current trail design.**

**5X STIPULATION**

This project was certified for Section 106 on 9/22/10 as No Adverse Effect with a stipulation that has since been met. Today's Project Scope Update was certified with no additional stipulations.

**PROJECT REVIEW CONDITIONS**

The Executive Committee recommended that the proposed **Milagra Battery Trail and Signs** project be approved and determined it would meet the terms of a Categorical Exclusion with the preparation of a separate environmental compliance document for Superintendent's signature with the following conditions:

1. Project Managers, Kirsten Holder and Christine FitzGerald, will work with Steve Ortega, Environmental Protection Specialist, and Darren Fong, Aquatic Ecologist, to ensure the project meets all Conditions and Conservation Measures under the 2007 USFWS Biological Opinion. If deviations from the BO are contemplated, reinitiation of consultation may be necessary.
2. Project Managers will ensure accessibility requirements are incorporated in the parking and trailhead designs.
3. Project Managers will follow up with NPS Law Enforcement to determine enforcement rights within easement properties, and if desired and applicable, ensure that the Superintendent's Compendium is updated to allow enforcement of social trail closures.

4. Project Managers will work with Barnaby Fisher, Acting Trails Supervisor to coordinate construction timeline given regulatory requirements; and Steve Ortega to work with environmental consultants on NEPA compliance.

Project Managers, **Kirsten Holder** and **Christine FitzGerald**, will document and note the completion dates of the above-required actions in PEPC and upload all pertinent documentation. PM's will work with Steve Ortega and environmental consultants to prepare a separate environmental compliance CE package for Superintendent's Approval.

General Superintendent's Comments:

Concurrence:

**[signed by Aaron Roth on 8/18/15]**

_____ _____

General Superintendent Date

# ATTACHMENT
## Project Description – August 5, 2015 Project Review

**Milagra Battery Trail, and Signs, Milagra Ridge, PEPC 32170**

This project was previously reviewed as Scoping at 5x only, 9/22/10 and approved administratively, 10/5/10, with one stipulation. It was presented at Project Review as Scoping, 9/10/10. The Executive Committee requested it return for final review and approval following the completion of several recommendations by the committee. Project management has shifted from Steve Griswold to Kirsten Holder, and will be taken over in the interim during Kirsten Holder's maternity absence by Christine FitzGerald.

The project proposes to formalize a series of existing braided social trails into a multi-use trail located on the southern edge of a 34 acre conservation easement between the Connemara condominiums and NPS property established in 2007 as part of an agreement between the developer and NPS. This project will address the need to consolidate social trails, complete a segment of the Bay Area Ridge Trail, and protect endangered species habitat. Rather than hiking use only as originally proposed in 2010, it is returning now as a multi-use trail with a revised alignment that connects the trailhead with the existing upper Milagra trail network. The formalized social trail would be called the Milagra Battery trail. The trail would be 5-6' wide with a granular compacted tread material. The project would include NPS trailhead and directional signage. The conservation easement also included set-asides for habitat restoration.

Residential construction is complete on the developed portion of the property and a public access trailhead has been established by the developer. It is now time to establish a preferred trail connection to the Milagra Ridge trail system for residents and the public that will protect habitat and establish a more sustainable pattern of use. An excerpt from the 2007 Biological Opinion describing the relevant actions is attached in PEPC. In the agreement with the developer, $25,000 was committed to implement a trail plan that was described in a June 2000 document from project consultant Watershed Science. This plan is attached in PEPC.

The project timeline up to this point has been:

- 2007 NPS acquired an easement
- 2007 NPS initiated FWS consultation
  - BO listed MBB, SBE, SFGS, CRLF
- 2010 PR for scoping, hiking trail
- 2013 Priority Conservation Area grant, 3:1 match
- 2014 Bay Area Ridge Trail designation

Although the 2007 FWS BO lists San Francisco Garter Snakes, over 10 biological surveys have since been conducted without finding evidence of their presence. This begs the question as to what level of additional consultation with USFWS is required to complete the project. Christine FitzGerald, Acting Project Manager, has proposed to work with Steve Ortega, Environmental Protection Specialist, and Darren Fong, Aquatic Ecologist, to determine the best course of action.

The anticipated NEPA pathway is a Categorical Exclusion. Due to partial project funding from the state, CEQA compliance is also required. A Categorical Exemption is expected as the CEQA pathway. A joint NEPA/CEQA compliance document would be completed by a contractor.

Existing conditions on the site include:

- Braided network of social trails
- Existing social trails are steep and deeply eroded
- Several informal entry/exit trails to neighborhoods and school
- Illegal dirt bikes and jumps

The proposed trail specifications include:

- 4'-6' wide, multi-use trail
- NPS wayfinding and regulatory signage
- Post-and-cable fencing to protect sensitive habitat
- Re-vegetation and erosion control
- Trail construction February - June 2016

The lower switchback section of the trail currently runs at an old alignment of greater than a 20-30% running grade (Figure 1), and would be realigned to better follow the contour of the topography and to result in less than a 10-15% running grade (**Figure 2**).

**Figure 1. Old alignment**

**Figure 2. New alignment**

The upper switchback section currently is comprised of multiple alignments of a greater than 20-30% running grade, and would be realigned in switchbacks to result in less than a 10-15% running grade.

**Figure 3. Multiple old alignments**

**Figure 4. New alignment**

Both alignments would use rock walls to raise trail tread to a sustainable height. The trail project would take 4-5 months to complete and outcomes would include:

- ~2000' of hardened trail tread surface
- New alignment will reduce long term maintenance costs and provide habitat protection
- Overall reduction in trail running grade
- A single defined route providing access from Pacifica neighborhoods to Milagra Ridge
- Great potential for volunteer opportunities with nearby High School and local community

# Attachment C – CEQA Categorical Exemption Memorandum

# Categorical Exemption Form

**Project:** Milagra Battery Trail and Signs, Milagra Ridge

The Milagra Battery Trail project (the project) would consolidate an existing network of braided informal trails into one formal multi-use trail in Lower Milagra Ridge between the Connemara condominium development and the National Park Service (NPS) property and trail system on Milagra Ridge in the City of Pacifica. The location for the proposed consolidated trail is along the southern edge of a 34-acre Conservation Easement Dedication Property established in 2007 as a result of an agreement between O'Brien homes and the NPS. The project would also complete a segment of the Bay Area Ridge Trail. An existing parking lot designated for public GGNRA access is located at the end of Connemara Drive, which currently provides access to the existing social trails and would continue to provide public access to the Milagra Battery Trail upon completion. Existing conditions in the project area include: several social trails that are steep and deeply eroded; several informal entry and exit trails to neighborhoods and the adjacent Oceana High School; and illegal dirt bike jumps. The formalized social trail would be called the Milagra Battery trail. The trail would be 5-6' wide with a granular compacted tread material. The project would include NPS trailhead and directional signage.

### CEQA EXEMPTION

Projects may be exempt from CEQA for categorical reasons. A categorical exemption is typically a class of project that is generally not considered to have potential impacts on the environment. Categorical exemptions are identified by the State Resources Agency and defined in the CEQA Guidelines (14 California Code of Regulations Sections 15300-15331). This project would not result in a direct or reasonably foreseeable indirect physical change in the environment and is categorically exempt from CEQA as described below.

Under CEQA Guidelines Article 19, Categorical Exemption, Section 15301 (Class 1) operation, repair, maintenance, or minor alteration of existing structures or facilities not expanding existing uses. The following criterion under Class 1 is applicable to the project: (c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities.

As described in the project description, this project would consolidate the existing informal trails into one established route. As an existing pedestrian trail, it would be exempt from CEQA under CEQA Guidelines 15301. Potential effects from the construction and operation of this project are discussed in Section E of the Project Description.

### Exceptions to Exemptions (CEQA Guidelines Section 15300.2)

CEQA Guidelines Section 15300.2, stipulates exceptions to categorical exemptions for the following topics: cumulative impact; significant effect; scenic highways; hazardous waste sites; and historical resources.

**Cumulative Impacts**. Exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. Because the project would

not result in any direct or foreseeable indirect environmental impacts, there is not the potential for the project to contribute to a cumulative impact.

**Significant Effect**. A categorical exemption may not be used for an activity where there is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances. There are no unusual circumstances and the trail construction involves routine construction activity. As described above there would be no significant effects on the environment as a result of the implementation of this project.

**Scenic Highways**. A categorical exemption may not be used for a project which may result in damage to scenic resources within a highway officially designated as a state scenic highway. The Milagra Battery Trail is not within view of any officially designated California scenic highways (Caltrans, 2015).

**Hazardous Waste Sites**. A categorical exemption may not be used for a project located on a site which is included on any list of hazardous waste sites compiled pursuant to Section 65962.5 of the Government Code. The Department of Toxic Substances Control (DTSC) EnviroStor database does not list any existing hazardous materials sites within the project area (DTSC, 2015). The nearest hazardous waste site is on Milagra Ridge, about 1,200 feet southeast of the proposed trail alignment. This is the San Francisco Nike Battery 51, a military evaluation site, containing three underground storage tank (UST) and one aboveground storage tank (AST). The storage tanks had been used for fuel oil. According to the DTSC, the contents were removed from all tanks and soil testing was performed at the site. Because the hazardous waste site is outside of the proposed trail project area, its presence does not result in an exception to the Categorical Exemption for the proposed project.

**Historical Resources**. A categorical exemption may not be used for a project which may cause a substantial adverse change in the significance of a historical resource. A "substantial adverse change" is defined by State CEQA Guidelines Section 15064.5 as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

Two historic-era structures (Fire Control Station BS Construction #129 and a historic-era paved road segment) are within the proposed project APE. While individually not considered a significant resource (i.e. a historic property) and despite having been moved from its original location at Devil's Slide, Fire Control Station BS Construction #129 is considered a contributing resource to the San Francisco Harbor Defenses National Historic Landmark District. For management purposes, NPS considers this contributing resource to be a historic property.

The remains of the historic-era paved road in the APE are associated with Nike Site SF-51. Previous documentation (NPS, 2010) has not considered the road as a contributing resource to the San Francisco Harbor Defenses National Historic Landmark District. The road lacks integrity of design, materials, workmanship, and association. The upper portion of the road is entirely removed and the lower portion is nearly incomplete. The road is not considered a historic property and no additional consideration is necessary for the proposed project.

The proposed project would have No Adverse Effect to Historic Properties. There would not be a direct effect on a historic property—B6S6 Construction #129. Construction of a new trail over an existing trail route would not cause a visual change that would be considered adverse. As the structure is immediately adjacent to the proposed trail, indirect effects could include increased visitation; however this would also not be considered an adverse effect. Current recommendations from the Historic Resources Study for Golden Gate National Recreation Area San Mateo County include appropriate signs and panels be installed at Milagra Ridge to interpret its history.

### CEQA Conclusion

The Milagra Battery Trail project is exempt from environmental review under CEQA Guidelines Section 15301, which provides categorical exemptions for operation, repair, maintenance, or minor alteration of existing structures or facilities including existing pedestrian trails. The project would consolidate the existing social trails into one established route.

The operation, repair, maintenance, or minor alteration of existing structures or facilities including existing pedestrian trails is categorically exempt from environmental review under CEQA Guidelines Section 15301, Class 1(c). The proposed project is eligible for this exemption because the project would consolidate the existing social trails into one established route. In addition, none of the exceptions to exemptions (Section 15300.2) are applicable to the project.

> **Categorical Exemption**: On the basis of the impact assessment in the joint CEQA/NEPA Project Description for the Milagra Battery Trail and Signs Project, City of Pacifica review, public input, and the information in the project record, this project is Categorically Exempt (CE) from further CEQA analysis in accordance with CEQA Guidelines Article 19, Categorical Exemption, Section 15301:
>
> - (Class 1) operation, repair, maintenance, or minor alteration of existing structures or facilities not expanding existing uses. The following criterion under Class 1 is applicable to the project: (c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities.

**Decision: I find that the action fits within the categorical exemption above. Therefore, I am categorically exempting the described project from further CEQA analysis. No extraordinary circumstances apply.**

_____ **Date:** _____