Planning for Success.

January 4, 2016

Suzanne Avila
Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

Re: Consideration of Public Comments Received on the Stirling Subdivision Mitigated Negative Declaration

Dear Suzanne:

Pursuant to California Environmental Quality Act (CEQA) Guidelines section 15074, the Town is required to "consider" comments received on the Stirling Subdivision Mitigated Negative Declaration (MND) prior to making a decision on the proposed project. During the public review period for the MND, 12 comment letters/emails were received. Each is included as an attachment to this letter. Commenters included (dates indicate receipt by Town):

1. Nancy Couperus and George Clifford, Co-Chairs, Town of Los Altos Hills Open Space Committee, October 8, 2015
2. Nancy Couperus (Resident), October 19, 2015
3. Ann A Duwe, Chairman, Town of Los Altos Hills Pathways Committee, October 20, 2015
4. Alan and Carol Kaganov, et. al. (Residents), October 21, 2015
5. Masayuki Murakami (Resident), October 23, 2015
6. Sue Welch (Resident), October 23, 2015
7. Pat Ley and Carol Gottlieb, Co-Chairs, Town of Los Altos Hills Environmental Design and Protection Committee, October 23, 2015

EMC PLANNING GROUP INC.
A LAND USE PLANNING & DESIGN FIRM

301 Lighthouse Avenue Suite C Monterey California 93940 Tel 831·649·1799 Fax 831·649·8399
www.emcplanning.com

8. Sharen Schoendorf (Resident), October 23, 2015
9. Benjamin Sloss, et. al. (Residents), October 19, 2015
10. Kent Webb (Resident), October 23, 2015
11. Alice Sakamoto (Resident), October 23, 2015
12. Jeff Peterson, Wesley Ham (Project Engineer), October 23, 2015

Four general, major themes were recurrent in the comments received from local residents. Each of these is identified below in the "Comment Themes and Discussion" section. For each theme, a summary of comments is provided as is a discussion of the relationship of the theme to the content and analysis contained in the MND. These themes of concern represent the predominant comments on topics that are within the scope of the CEQA review. Comments and responses that do not fall under the four themes are provided in the "Other Environment Effects" section. The comment letters were also reviewed to identify comments on the specific technical content of the MND.

As you know, Wilsey Ham, the applicant's project engineer, submitted a follow-up letter to the Town dated November 18, 2015 that includes the applicant's responses to comments from many of the commenters. This letter is included as an attachment that follows the individual commenter letters. The responses to comments contained herein should be considered in conjunction with the supplemental information in the letter from Wilsey Ham. The letter from Wilsey Ham includes discussion of a range of issues that are not commonly addressed or required in CEQA documents such as quality of life, privacy, and property values. It also includes discussion of how input from the Town's committees was considered over time in the design of the project description/subdivision map, and answers specific questions raised by some commenters in relationship to their individual properties.

Comment Themes and Discussion

1. Town Committee Comments and Project Design

Several commenters questioned why recommendations of the Town's Open Space Committee, Pathways Committee, and Environmental Design & Protection Committee do not appear to be included in the proposed project. Recommendations regarding on-site setbacks and easements for wildlife corridors were frequently referenced.

The MND evaluates the environmental effects of the proposed project. The proposed project is represented primarily by the applicant's proposed subdivision map, which is included in the MND as Appendix A. The extent to which the applicant considered the recommendations of various committees in the project design is the discretion of the applicant.

Several commenters identify that a number of committee recommendations are not included in the project description and imply that as a result, the proposed project has significant environmental impacts that are not identified as such. The significance of project impacts is evaluated against thresholds of significance identified for each of the environmental topics addressed in the MND. These thresholds are taken from Appendix G of the CEQA Guidelines as is the Town's practice. The committee recommendations do not constitute thresholds of significance against which the significance of project impacts is evaluated. That the applicant may not have incorporated all of the various committee recommendations is itself not a basis for determining that the proposed project has significant impacts that require implementation of mitigation measures. However, this fact does not preclude the Town from requiring the applicant to incorporate one or more of the recommendations as conditions of approval for the proposed project. The Town Planning Commission has the discretion to recommend to the Town Council that the proposed project be required to incorporate one or more committee recommendations and the Town Council has the discretion to require such conditions of approval.

2. Aesthetics/Scenic Vistas

Several commenters noted that new homes proposed for the site would have potential to obstruct "scenic vistas" available from their adjacent individual properties and that MND does not address this effect. It is common that the general plans or other policy documents prepared by local agencies such as towns, cities, and counties define specific scenic vista locations within their respective jurisdictions that should be protected. The MND notes that the Town General Plan does not define such vistas. More importantly in light of the related comments, it is the professional practice in CEQA documents that scenic vistas are defined as those that may be available from public viewpoint locations, not from individual private properties. Hence, the MND does not define views from adjacent properties as scenic vistas that could be impacted by the proposed project.

It is acknowledged that existing views from some homes adjacent to the project site could be modified with implementation of the proposed project. This is common for new development projects at the periphery of existing residential areas and for any type of development on infill parcels that are bordered by residential uses.

The proposed project would alter the existing visual character of the site. However, the proposed project would be developed at densities which are consistent with the zoning regulations that apply to the site, including density limitations, building height limitations, etc. All of the properties surrounding the site have been developed with rural residential uses under similar or the same density and design regulations. Consequently, the proposed project would not be visually inconsistent with the existing residential uses that surround it.

Several commenters noted that views available from their homes located along Charles Avenue would be impacted by removal of heritage oak trees needed to widen Charles Avenue. As described above, evaluating of effects on views from individual private properties is not a consideration for determining impact significance when preparing CEQA documentation.

Some commenters noted that the proposed project would introduce new sources of light and glare. This is acknowledged in the MND as common for the type of development proposed. The proposed project would not introduce "substantial" new sources of light or glare that adversely affect day or nighttime views – this is the standard or threshold of significance identified in the MND for this effect.

3. Loss of Heritage Oak Trees

Several commenters noted that the Town places high priority on protecting loss of heritage oak trees in the course of considering new development projects. A number of commenters referenced General Plan policies and other standards that reflect this priority.

Based on the letter of November 18, 2015 submitted by the applicant's engineer and attached to this letter, the applicant has made an effort to locate the new on-site extension of Charles Avenue, the off-site widening of existing Charles Avenue, new home building footprints/driveways, and other improvements to consider and reduce loss of heritage oak trees as required in Town General Plan policies and development regulations. Nevertheless, loss of heritage oak trees will occur. This loss is identified in the MND as a significant

impact. Mitigation is required per mitigation measure BIO-8 (MND, pp. 52-53) consistent with Town policies and regulations to reduce the impact to less than significant.

4. Loss of Wildlife Migration Corridors

Many commenters were concerned about the potential degradation of the site as a wildlife movement corridor. Several commenters cited a 2006 study prepared for the Town by Live Oak Associates (a study referenced in the MND, p. 52) which suggests that the project site is an important wildlife corridor. That study emphasized and focused on the importance of riparian corridors as wildlife corridors. Many comments also cited recommendations from Town committees for maintaining on-site wildlife corridors, especially along the eastern and northern site boundaries, and utilizing wildlife friendly fencing to enable wildlife to move as freely through the site as possible. These recommendations were based largely on the 2006 Live Oak study.

The 2006 Live Oak analysis does show the site as part of a wildlife corridor within which specific considerations should be made to maintain corridor quality. Other such corridors are identified in other portions of the Town. The 2006 analysis is relatively broad in that it evaluated potential corridors on a Town-wide basis. It did not include field analyses to verify the value of individual corridors identified in the study.

As referenced in the MND (p. 52), Live Oak Associates subsequently conducted a site specific wildlife corridor analysis in 2014. This analysis references Town General Plan policy, Town Open Space Committee guidance, and Town Municipal Code regulations as context for the analysis. The analysis states that "the riparian woodland corridor associated with Matadero Creek just west of the site is clearly the most important regional wildlife pathway near this site" (Live Oak Associates 2014, p. 3). The analysis notes that about 40 percent of the project site that is comprised of the riparian corridor would be preserved through its inclusion in an open space easement as proposed by the applicant and reflected in the project subdivision map included in the MND.

Live Oak Associates acknowledges that any change in the landscape will, "result in changes in the spatial use patterns of several species of wildlife". However, Live Oak Associates concludes that for all wildlife species considered, the change is not significant under CEQA (Live Oak Associates 2014, p. 3). Regarding deer, the author notes that deer would continue to regularly access the site assuming that individual lots are not surrounded by impermeable

fencing. A conclusion is drawn that, "So while the relatively small disturbance from this project will alter spatial use patterns for a few individuals, this project is not expected to have any long-term adverse impacts to the local occurrence or abundance of key wildlife species" (Live Oak Associates 2014, p. 4). This determination was made based on a project description that did not include wildlife movement corridors along the eastern or northern boundaries of the project site as recommended by Town committees and supported by a number of commenters.

EMC Planning Group's staff wildlife biologist conducted a site analysis, conducted research, and reviewed both of Live Oak Associates' reports. The EMC Planning Group wildlife biologist made similar observations about conditions on the site and about the regional wildlife movement context and agrees with Live Oak Associates' 2014 conclusions as reported in the MND. Given the conclusions of two professional wildlife biologists, potential impacts on wildlife movement were determined to be less than significant and no mitigation measures were required.

The 2014 Live Oak Associates analysis includes several recommendations for "enhancing the rural character of the area" and "lessening anthropogenic effects on the remaining natural habitats near the site" (Live Oak Associates 2014, p. 4). As described in Section 1 above, it is at the Town's discretion as to whether these recommendations should be attached as conditions of project approval. One of the recommendations, installation of wildlife permeable fencing along the eastern and northern boundaries of the site, has already been implemented. While not a recommendation of Live Oak Associates or our staff biologist based on environmental impact, it is at the Town's discretion as to whether wildlife corridors recommended by Town committees and supported by commenters should also be included as a condition of approval.

Other Environmental Effects

Several commenters provided comments on issues that fall outside the general topics of concern listed in items 1-4 above. These are addressed below.

Noise, Air Pollutant Emissions, and Traffic. Several commenters, particularly those with properties located adjacent to the project site or along Charles Avenue, noted that the proposed project would create noise, air emissions, and/or increased traffic effects that affect their quality of life, privacy, and/or property values. While these concerns are

understandable, the purpose of the MND is to determine if related effects are significant based on accepted standards of significance. Standards of significance for quality of life, privacy, and/or property value impacts are not included in Appendix G of the CEQA Guidelines per se and have not been utilized by the Town to date. Therefore, these effects are not directly evaluated in the MND. It is acknowledged that some of the proposed project's direct environmental effects could be perceived by local residences as indirectly affecting their current quality of life, but these changes do not inherently rise to a level of significant impact in the CEQA context.

Ambient noise levels in the project area would marginally increase due primarily to a very nominal increase in vehicle trips to and from the site. Noise impacts are generally significant if average noise intensities over a specified time period, usually an hour, rise above a quantitative threshold. The proposed project could result in a net average increase of about seven to nine trips in or out of the site in the AM or PM peak travel hours. This is a very minor increase in traffic volume relative to changes that exceed traffic impact thresholds of significance as described in the MND (p. 83). The average increase in hourly noise level during these peak hours would not approach significance thresholds identified in the General Plan Noise Element as described in the MND (p. 74).

Similarly, the primary source of long-term air emissions from the project will be from vehicle trips. Given the very low volume increase in daily vehicle trips, air emissions volumes from the project will not approach impact significance thresholds as described in the MND (MND, p. 28).

Special Status Species. One commenter noted (Letter 6) that the MND did not address three fully protected species that could occur on the project site. No evidence is provided by the commenter for this statement, so a specific response is not possible. The MND includes analysis of project effects on special status plant and animal species and an additional detailed habitat assessment for California red-legged frog, California tiger salamander and San Francisco garter snake.

Project Description. One commenter noted (Letter 6) that the project description is insufficient due to lack of information about "major projects" associated with the proposed project and their environmental impacts (i.e. slope stabilization and storm drainage system). No further information is provided by the commenter for this statement, so a specific response is not possible. In general, the effects of the two noted "projects" are considered to

be within the scope and significance of effects for the project as a whole. Both require excavations that are common for development projects and both are subject to the same water quality, erosion control, and construction operation (daily hours) regulations of the state and the Town as described in the MND.

Past Effects/Baseline. One commenter (Letter 10) noted that the habitat impacts of past activities on the project site and within the neighborhood must be considered in the MND regarding impacts on wildlife habitat for California quail and gray fox. The MND includes evaluation of potential impacts on special status wildlife and wildlife movement in the context of conditions that existed at the time the environmental analysis began, which constitutes the baseline condition for wildlife habitat/movement conditions. The two noted species are not special status species. Issues related to wildlife movement are described above in item 4.

Modification of Biological Resources Mitigation Language. The applicant's project engineer (Letter 12), requested modification of the language in mitigation measure BIO-4b to eliminate the need for CDFW or USFWS approval of a qualified biologist to monitor for presence of/impacts on California red-legged frog. It is recommended that this language not be modified, as the language is considered consistent with the practices of these agencies.

If you have any questions about the information contained in this letter, please do not hesitate to contract me.

Sincerely,

Ron Sissem
Principal Planner

Attachments

Suzanne Avila

From: Nancy Couperus <couperus@mindspring.com>
Sent: Thursday, October 08, 2015 6:53 PM
To: Suzanne Avila
Cc: george@clifford.net
Subject: Initial Study - Comments

As co-chairs of the Open Space Committee, we are requesting that our Committee's recommendations on the proposed Stirling subdivision be included in the Initial Study, because:

(a) we see no mitigation to our concerns discussed, and

(b) we materially disagree with some of the statements made in the consultant's Mitigated Negative Declaration report. We disagree with the consultant's "Less Than Significant Impact" on wildlife movement, which is not supported by the Wildlife Corridor Study that the Town paid for previously.

Nancy Couperus, Co-Chair - Open Space Committee
George Clifford, Co-Chair - Open Space Committee

This email has been checked for viruses by Avast antivirus software.
www.avast.com

13680 Page Mill Road
Los Altos Hills 94022
October 16, 2015

Via Electronic Mail

Suzanne Avila, Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills CA 94022

RECEIVED

OCT 19 2015

TOWN OF LOS ALTOS HILLS

Re: Initial Study/Mitigated Negative Declaration
Stirling Subdivision

Dear Planning Director Avila,

I am submitting this letter as an interested resident of Los Altos Hills to provide comments on the Mitigated Negative Declaration (MND) for the Stirling Subdivision.

After reviewing the MND, it is my position that the MND is deficient in failing to adequately address the environmental consequences of development that have the potential to block a critical wildlife corridor – a corridor that links this property to the open space of the Arastradero Preserve, to the open space of Poor Clare's and to Byrne Preserve.

Areas that link wildlife habitat have become vital because native animals, such as deer, fox, bobcat and coyote, are prevented by roads, fences, homes and other development from moving freely as they once did (in Los Altos Hills). Page 6 – Wildlife Species and Habitat 315 – Conservation Element of the General Plan.

Additionally, preservation of open space in Los Altos Hills and the protection of local wildlife are viewed by residents as characteristics that define the Town. Every Town survey has confirmed open space preservation to be a top priority. The most recent 2011 survey revealed that residents highly value protection of the rural environment and wildlife (92.6% and 88.8%). See attached survey results.

Listed as Principles of the Open Space Element of the Town's General Plan:

a) to the maximum extent possible, all uses of land and structures in the planning area should be subordinate to the general open space quality of the planning area
b) open spaces, to the extent possible, should be linked together visually and physically to form a system of open spaces

Live Oak Associates "Wildlife Corridor Study" of December 2006 identified areas within the

Town of Los Altos Hills that contribute to the regional movement of wildlife populations with a goal of identifying existing landscape linkages (i.e. wildlife corridors) within the Town. As explained in this document, "Habitat corridors are vital to provide terrestrial animals connectivity between core habitat areas (i.e., larger intact habitat areas where species make their living). Connections between two or more core habitat areas help ensure that genetic diversity is maintained . . . This is especially true in fragmented landscapes such as LAH and the surrounding urbanized areas."

"New subdivisions, residences, and barrier fence can result in the breaking up of large blocks of habitat into smaller, disconnected, isolated pieces. This *habitat fragmentation* is one of the greatest threats to wildlife. Fragmentation reduces the area and the quality of habitat available to sustain healthy native wildlife populations; it prevents animals from moving between the remaining patches of habitat to access food, shelter, mates, and other resources. . . . Unless movement corridors are planned for and protected in advance of future development, this fragmentation will continue." *Wildlife Management* " –LAH Open Space Committee brochure.

The 18+ acre parcel at 28030 Natoma Road was identified as a site of environmental and biological importance by both the Town's Wildlife Survey conducted in 2005 and the Wildlife Corridor Study performed by Live Oak Associates. They confirmed the sensitivity of this site because of the variety and number of different kinds of wildlife found on this parcel (e.g. coyote, bobcat, black-tailed deer, mountain lion, fox, opossum, skunk and raccoon).

The Initial Study/MND (Background - page 2) recognizes the above with the following statement:

> **"Town resource documents indicate the potential for the site to serve as a wildlife passage corridor in that it links open space/open areas within this portion of the Town, including Byrne Preserve to the south and Poor Clare's just to the east along Natoma Road, with Arastradero Preserve in Palo Alto to the northwest."**

However, the Initial Study (Biological Resources 4d - page 30) with respect to the question – ***Would this project interfere substantially with the movement of any native resident . . or wildlife species or with established native resident or migratory corridors . . ?*** -- assigns the value **Less Than Significant Impact.**

On the contrary, the value assigned should be **Potentially Significant Impact** or, at least, **Less Than Significant with Mitigation Measures Incorporated.**

Wildlife – deer in particular – have been using the open habitat of the meadow/field on this parcel as a corridor, allowing them access to the open space of Poor Clare's (albeit through a small opening in the existing fence). If development and/or fencing block this access, a major wildlife corridor will be negatively impacted. While the large riparian open space area is important for wildlife, restricting wildlife to creeks can make prey species more vulnerable to predators, such as mountain lion,

coyote, skunk, fox, etc. For this reason additional open space areas (meadows and fields) are also needed for wildlife movement.

The removal of the existing property-line fence and replacement by a wildlife-friendly fence on the northern and eastern boundary is welcomed. However, such fencing is rendered useless, if other barrier fencing is erected on individual properties.

The Live Oak Associates "Analysis and Recommendations Regarding the Proposed Development" on the Stirling property (page 3) states:

. . . deer will continue to access this site regularly assuming that the individual lots are not surrounded by impermeable fencing.

The elimination of the existing perimeter fence and replacement by a wildlife-friendly fence, while helpful, will not guarantee the continued use of this area by local wildlife and allow their safe passage to the open space areas to the east, to the south, and to the northwest.

MITIGATION MEASURES PROPOSED:

In order to mitigate the impact of development on the open space character and on wildlife, it is being recommended by three Town committees that an open space easement or pathway easement between 25 and 30 feet wide be located on the northern and eastern boundaries of the property. An easement, combined with wildlife-friendly fencing and other measures to prevent future owners of individual lots from erecting impermeable fencing in this area, will facilitate wildlife flow through this area to the nearby open space.

CONCLUSION:

In conclusion, I believe that the MND does not meet the goals of the Town's General Plan "to adequately assess the potential of this development to fragment and isolate significant wildlife habitats. (Goal 3. Program 3.3 of the Conservation Element). Nor does it comply with the Santa Clara County General Plan, which encourages "maintenance of migratory corridors and linkages between natural areas to compensate for fragmentation."

If mitigation measures, as enumerated above, are taken to provide safe passage for wildlife through the property, rather than exclusively in the riparian area, the corridor will remain intact and wildlife will have been protected. The open space character of the Town will have been retained as well.

Very truly yours,

Nancy Couperus

LAH Online Survey: 2011 Fence Survey

SurveyMonkey

1. Do you agree that one intent of our founding documents was to preserve our rural environment?

	Response Percent	Response Count
Yes	92.6%	526
No	7.4%	42
answered question		568
skipped question		14

2. Is our rural environment and the protection of wildlife important to you?

	Response Percent	Response Count
Yes	88.8%	502
No	11.2%	63
answered question		565
skipped question		17

3. Do you agree that peripheral barrier fences built on shared property lines create fence grids that adversely affect the Town's intended rural character by "walling in" properties, reducing the open ambience of the Town, blocking natural wildlife corridors that keep wildlife away from yards and which may also force them on to roads, and can cause property line disputes between neighbors?

	Response Percent	Response Count
Yes	52.6%	301
No	37.1%	212
No Opinion	10.3%	59
answered question		572
skipped question		10

Pathways Committee
Town of Los Altos Hills
October 20, 2015

RECEIVED

OCT 20 2015

TOWN OF LOS ALTOS HILLS

Suzanne Avila, Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

Re: Stirling Sudivision
Assessor's Parcel 182-10-057

Dear Suzanne,

At our meeting on October 19, 2015, the Pathways Committee (PWC) voted unanimously (with Sue Welch recusing herself) to submit the following response to the Mitigated Negative Declaration (MND) filed on behalf of the Stirling Subdivision. The PWC reviewed the project in 2012, 2013 and 2014, and minutes of these meetings are available. Purpose of the reviews was to recommend how to integrate the project into the Town's existing pathway system. The recommendations below reiterate the majority vote on the issues listed.

The maps in the Mitigated Negative Declaration (MND) submitted on behalf of the Stirling Subdivision by EMC Planning Group Inc. of Monterey, California fail to reflect previous PWC recommendations. Significant negative impacts to the immediate neighbors, the community at large and the land underlying the project will result if the PWC recommendations are not incorporated into the Tentative Map and MND. Specifically, the project, as shown, would have significant negative effects with respect to:

Aesthetics
Geology/Soils (Geotechnical Hazards)
Hydrology
Land Use/Planning

Aesthetics

The Stirling Subdivision is one of the last large subdivisions possible in Los Altos Hills. For this reason it is imperative that it not violate the rural, residential character that has existed in Town since incorporation. Part of that character is created by the pathway system. Paths may run beside the roads but are often separated from the pavement for safety and aesthetic reasons. Off-road paths connect neighborhoods, create pleasant recreational loops and are essential as an alternative to roads in emergencies. Though they function as sidewalks, paths help preserve the open, rural aspect of the Town, especially when built to meander around trees and other natural features.

The pathway easements shown in the MND are not wide enough to create the necessary meandering, open character required to make this development consistent with the Town's look and feel. Wider easements are necessary to prevent

the pavement as possible. The path should meander to avoid cutting down mature trees.

To mitigate the significant negative effect of years of construction activity, the PWC recommends that the paths be built as part of the subdivision improvements and not wait until after completion of the homes.

The PWC further recommends that all paths be staked and inspected by the PWC before construction.

The PWC notes a 50' scenic and pathway easement on properties outside the western boundary of the Stirling project along Matadero Creek. The PWC wanted to draw attention to the kinds of requirements used to integrate other subdivisions into the pathway system and to safeguard the rural character of the Town.

Yours sincerely,

Ann A. Duwe, Chairman
Pathways Committee

Alan L. Kaganov and Carol M. Kaganov
13300 Simon Lane
Los Altos Hills, CA 94022

Phone (650) 947-3939
Fax (650) 941-8066
E-mail: ckaganov@ aol.com

RECEIVED

OCT 21 2015

TOWN OF LOS ALTOS HILLS

To: ~~Cynthia Richardson, Planning Consultant~~
Suzanne Avila
Planning Director
Los Altos Hills Planning and Building Department

Date: October 19, 2015

Re: Stirling Subdivision

We are submitting this written comment on the proposed mitigated negative declaration for the Stirling Subdivision, 28030 Natoma Road. We reside at 13300 Simon Lane, and the western edge of our property backs up to Charles Avenue. (This is a misnomer – it should be called Charles Path, or Charles Lane, or Charles Road – it can hardly be described as an "avenue," which is defined in the dictionary as "a broad road," "a wide street," "a thoroughfare.")

We recently received a notice of Los Altos Hills' intent to adopt the mitigated negative declaration for the Project, and we reviewed the access road plans online. We contend that the current proposed design of the egress and ingress easement for the project can and *should* be re-redesigned to minimize the issues we see:

(1) We discovered that instead of a 17-foot wide roadway, the proposed easement is now 22 feet wide along its entire length, and in some places wider. This will result in the removal of numerous mature Heritage Oak Trees that line the road and provide shade, shelter and visual enhancement to the existing roadway and homes. These trees add wonderful greenery on our property, and directly affect our view to the west.

(2) In addition, we hear that the road is being widened to accommodate a proposed walking pathway that parallels Charles "Avenue." This is of utmost concern to us! In our previous home at 190 Cherokee Way in Portola Valley, there was a walking path directly along the rear of our property, and it was one of the main reasons we sold our house and moved to Los Altos Hills! Having pedestrian activity within view, and earshot, negatively affected the enjoyment of our home, inside and out. People walking on the town path added noise, lessened our feeling of privacy, and it led to loss of sleep and mental and physical stress. We could see and hear the people, their horses, and their dogs, and we noticed that one dog's bark led to all the neighbors' dogs barking in turn. Also, we felt it created a security risk! This is true in LAH, too, because the County Sheriffs rarely patrol our small streets.

(3) Adding a construction zone on a narrow road behind, and adjacent to, our house will bring a lot of extra traffic – with noise, dust and dirt -- during the building phase, and it will *forever* bring dozens of cars, trucks, and other vehicles to the narrow road along our backyard. This is sure to have a negative effect on the property value of our home.

These are all serious concerns, and we would appreciate your taking them into consideration when evaluating the merits of your subdivision -- its ingress and egress on Charles, widening the road, and creating an unnecessary walking path. Our aim is to continue enjoying our home, our property, and the country flavor of Los Altos Hills.

These concerns and requests are also supported by our neighbors who have signed the bottom of this letter indicating their concern about (1) the removal of Heritage Trees, (2) creating a walking path, and (3) maintaining our property values.

Thank you.

Name and Signature of Property Owner(s)	Property Address
Carol Kaganov	13300 Simon Lane, LAH
Carol M. Kaganov and Alan L. Kaganov	13300 Simon Lane, Los Altos Hills
Christine Sloss	28025 Natoma Rd LAH.
Ellice Papp	13263 Simon Lane, Los Altos Hills

October 23, 2015

RECEIVED
OCT 23 2015
TOWN OF LOS ALTOS HILLS

Ms. Suzanne Avila
Planning Consultant
Los Altos Hills, Planning and Building Department
Town Hall Office
26379 Fremont Road
Los Altos Hills, CA 94022

Re: Mitigated Negative Declaration for the Stirling Subdivison
(28030 Natoma Road, Los Altos Hills 94022)

Dear Ms. Avila,

My name is Masayuki Murakami. I have lived at 13313 Simon Lane for the past 26 years.

My family and I would like to submit our comments and concerns regarding the proposed Mitigated Negative Declaration (MND) for the Stirling Subdivision (28030 Natoma Road, Los Altos Hills 94022).

The design currently proposed by the developer regarding the vehicle road, pedestrian paths, and easement for the proposed plan raises serious concerns/problems for our property. Namely:

1. A negative impact on our family's quality of life caused by a significant increase in Automotive exhaust fumes, noise, and light pollution along Charles Avenue.
2. A significant decrease in privacy.
3. A decrease in property value.
4. The illegal removal of heritage oak trees on our property.

According to the MND, the improvement of the existing segment of Charles Avenue will require the removal of approximately 24 oak trees, a number of which are "heritage" trees of 12 inches in diameter or larger. This removal has several permanent negative effects on our everyday quality of life. According to the Stirling map for oak tree removal, there will be at least 7 heritage oak trees removed between our property and Charles Avenue.

The background and details regarding these 4 issues listed above are provided below, with particular attention to how the removal of these 7 trees plays a key role in each.

1. A negative impact on our family's quality of life and a negative environmental impact on our property

The amount of traffic on Charles Avenue will be much heavier than today once the future residents have moved into the new homes (owing to the residents' vehicles as well as their staff's)

The 7 oak trees (108, 111, 112, 113, 114, 118 and 119) currently dampen the effects of traffic on Charles Avenue by virtue of their canopies, which cover down toward the ground. If these 7 trees between our property and Charles Avenue are removed, our property (which is adjacent to the project

zone) will incur a substantial permanent increase in exhaust fume levels, ambient noise levels, and light levels compared to a scenario where these trees are not removed.

2. A significant decrease in privacy

Today, both our front and back yards have excellent privacy. The oak canopies contribute substantially to this privacy. Thus, the removal of any of these oak trees (108, 111, 112, 113, 114, 118 and 119) will significantly decrease the privacy of our property. Once any of these oak trees are removed, our everyday activities in our yard will become easily observable by others from along Charles Avenue and its proposed pedestrian pathway.

Additionally, the proposed pedestrian pathway along with our property would remove additional landscaping along this property boundary, decreasing our privacy further. The landscaping that would be removed includes the many small shrubs and 7 large trees planted along our fence adjacent to Charles Avenue. Many of these shrubs are either (1) on our property line, or (2) inside our property and shall not be removed. The 7 large trees were planted by the Sloss family under recommendation by members of the Los Altos Hills Landscape Review Meeting held in the Town Hall this year, in order to obstruct the sightline between their newly constructed garage and our property. These shrubs and new trees were planted recently and are meant to add to our property's privacy as they grow taller. Removing these plants would significantly decrease our property's privacy.

3. A decrease in property value

The removal of these 7 oak trees between our property and Charles Avenue would decrease the value of our property. We suffered such a decrease in property value in the past when a significant number of large oak trees were removed in this area.

When we purchased our property 26 years ago, there was a beautiful oak forest with more than 100 oak trees in this same area and the current Sloss property. However, more than 15 years ago, most of those oak trees were illegally removed, and the current Sloss property was built after such illegal removal by another developer. When this happened, we not only suffered a decrease in privacy but also a decrease in our property value.

If these additional 7 oak trees between our property and Charles Avenue are removed, our property value will decline further.

4. The illegal removal of heritage oak trees on our property

The proposed Mitigated Negative Declaration removes one oak tree that lies within our property. This may not be obvious at first glance, because our fence was built 0.5 ft. to 2 ft. inside our property line in order to allow these oak trees to grow unencumbered and also to avoid boundary disputes with our neighbors.

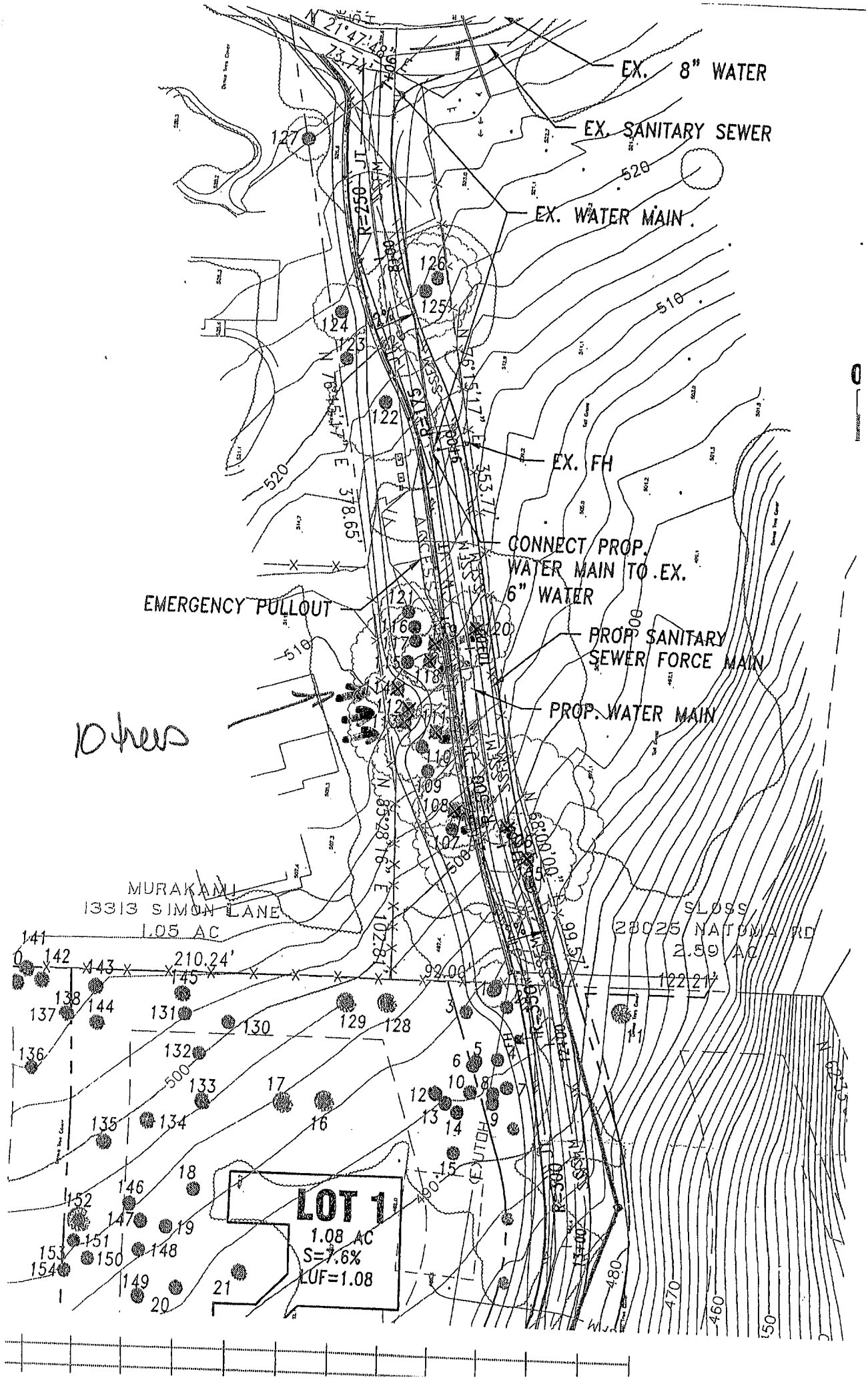
The oak tree in question is either 112, 113 or 114. Unfortunately it is difficult to identify the number on the attached Stirling property map. We hope to identify the proper number for this oak tree moving forward.

These heritage oak trees are valuable assets not only to our family, but also to our neighbors and to our community. They increase our collective property value, improve the quality of our everyday lives, and improve environmental quality. They are a key factor in differentiating our town from other nearby neighborhoods.

We have already permanently lost more than 40 large heritage oak trees and many small/medium oak trees more than 15 years ago, which were illegally removed. This time, we would like to ask that the Planning and Building Department of the Los Altos Hills Town Hall Office finds solutions that resolve the issues we have raised in this letter and helps us preserve the remaining valuable heritage oak trees for the future of our town.

Regards,

Masayuki Murakami
13313 Simon Lane
Los Altos Hills, CA 94022
Tel: 650-949-5001


EX. 8" WATER
EX. SANITARY SEWER
EX. WATER MAIN
EX. FH
CONNECT PROP. WATER MAIN TO EX. 6" WATER
EMERGENCY PULLOUT
PROP SANITARY SEWER FORCE MAIN
PROP. WATER MAIN
10 trees
MURAKAMI
13313 SIMON LANE
1.05 AC
SLOSS
28025 NATOMA RD
2.59 AC
LOT 1
1.08 AC
S=7.6%
LUF=1.08
R=250
R=175
R=300
210.24'
122.21'
378.65'
353.71'
92.00'
99.57'
102.81'
N 21°47'48" E
73.74'
N 76°15'17" E
N 85°28'16" E
N 68°00'00" E
520
510
500
490
480
470
460

27750 Edgerton Road
Los Altos Hills, CA 94022
October 23, 2015

Via Electronic Mail and US Mail

RECEIVED
OCT 23 2015
TOWN OF LOS ALTOS HILLS

Ms. Suzanne Avila
Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

SUBJECT: Initial Study/Mitigated Negative Declaration for Stirling (Top Elegant Investment, LLC) Subdivision dated September 14, 2015

Dear Ms. Avila:

I live in Los Altos Hills on a property adjacent to the proposed 9-lot Stirling (Top Elegant Investment, LLC) subdivision and am writing to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the project. I am a member of the LAH Open Space Committee and Pathways Committee, but have recused myself from committee discussions and comments and my opinions do not represent either committee. My comments are limited to how this large project may affect environmental conditions and resources near the property where I live.

This letter briefly outlines my concerns about the adequacy of the IS/MND. I plan to submit an additional letter addressing my concerns in detail within a few weeks, well before the December 3 meeting, as allowed by Public Resources Code section 21177(a). I have been advised that comments submitted after the October 23, 2015 deadline must still be addressed and entered into the administrative record.

Specifically, my comments describe inadequacies of the IS/MND in addressing 1) preservation of oak woodland and Heritage oaks; 2) evaluation and mitigation of increased noise levels expected from construction of subdivision improvements and nine new houses; and 3) protection of Matadero Creek, which runs between the Top Elegant parcel and the property where I live. I also note the IS/MND did not address three Fully Protected species that are known to or could occur on the project site.

The IS/MND lacks sufficient information and analyses to support conclusions that some impacts of the project will be "less than significant". In addition, further mitigation measures are needed for some impacts determined to be significant in order to reduce their impact to less than significant.

The IS/MND lacks sufficient description of major projects that will be done for subdivision improvements (i.e., slope stabilization repair and installation of an extensive storm water drainage system). Not enough information is provided to allow the public to understand what is proposed, how it will be done, and what the environmental impacts will be.

Los Altos Hills residents, and especially neighbors of the project, expect the Town as the lead agency to require an adequate and fully supported environmental review—including appropriate analyses and effective mitigation measures—before making the decision to approve a Mitigated Negative Declaration for this large new development in an environmentally sensitive area. I respectfully ask the Town not to approve the IS/MND for the Top Elegant subdivision until corrections are made and further study and analyses of potentially significant impacts are done.

Sincerely,

Sue Welch

RECEIVED
OCT 23 2015
TOWN OF LOS ALTOS HILLS

EDPC comments on the Initial Study of the Stirling Subdivision by the EMC Planning Group Inc.

On October 14th 2015 members of the Environmental Design & Protection Committee visited the Stirling Subdivision site. The EDPC was later asked to submit by October 23rd 2015 its comments on the Initial Study of the Stirling Subdivision submitted by the EMC Planning Group Inc.

They are as follows:

On August 21st 2014 the Environmental Design & Protection Committee submitted comments on the Stirling Subdivision Formal Submittal for a nine-lot Tentative Subdivision Map.

1. on that occasion we asked for an Open Space Easement to be established over a group of heritage oaks on Lot 1, oaks which form a significant grove.

Has this been done?

2. is the path of the road through the site the same as that taken on the plan used for the 2014 study? If it is not the same, where and how does it differ?

3. we asked that there be a wildlife corridor left along the eastern fence line, allowing the movement of animals from one open space to another.

Why has this suggestion not been accepted, since a wildlife permeable fence is shown all around the Stirling property, including this eastern property line?

The 30' easement along this fence could then accommodate the pathway which all the Committees concerned with the environment wish to have.

4. View Easements were requested for the residents of Simon Lane: has this request been addressed?

We submit that a 5' view easement on both sides of the property lines between Lots 1, 2, 3 and 4 would allow such views.

As no grading or building can be done within 10' of a lot line, then such a 5' site view line would not affect the applicant's MDA.

5. cannot an alternative be found to the position of the Lot 7 driveway?

As it is now drawn three oaks – no.85, dia.26", no.83, dia 20", and no.82, dia 20" – are to be cut down, and probably nos.86 and 84 as well, equally heritage size.

We understand that the Open Space Committee and the Pathways Committee are as dissatisfied as we that few if any of our carefully considered suggestions have been adopted. The above comments have been phrased in question form so as to require answers which we hope will be reasonable and straightforward.

Pat Ley, EDPC co-Chair

Carol Gottlieb, EDPC co-Chair

October 23rd 2015

RECEIVED

OCT 26 2015

TOWN OF LOS ALTOS HILLS

Suzanne Avila, Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

October 22, 2015

Suzanne Avila
Planning Director

Regarding D 1.a in the initial study/mitigated negative declaration report of the Stirling subdivision, (D. Evaluation of Environmental Impacts, 1.a. Aesthetics,) I disagree with table item 1.a that is demarcated, "No Impact" regarding the question, "Would the project have a substantial adverse effect on a scenic vista?" No mention was made of the present views of the western hills, sunsets, and heritage oaks enjoyed for decades by neighbors abutting the subdivision project. Heights of new homes were not considered which, if limited, would lessen the impact.

Regarding 1. Aesthetics item c. Visual Character, the statement that "the visual effects on the visual character of the Town as rural residential will be less than significant" does not address the fence gridding effect of back-to-back fencing. A mitigating factor would be a fence setback of 25 ft. or more.

Referring to page 52, d. Wildlife Movement, the existing fence has effected connectivity of wildlife between the Stirling subdivision and our property (13145 Byrd Ln.) on the Eastern border. We've seen a significant reduction of wildlife moving across our property to the creek on Byrd Lane, thus significantly impacting the quality of the previous wildlife corridor that was used by bobcats, coyotes, deer, etc. for decades. This negatively affects our quality of life. A fence setback of 25 ft. or more would greatly mitigate this problem.

Sincerely,

Sharen Schoendorf

Sharen Schoendorf
13145 Byrd Lane

Michael Schoendorf

Via Email and U.S. Mail

Cynthia Richardson, Planning Consultant
Los Altos Hills Planning and Building Department
Town Hall Office
26379 Fremont Road
Los Altos Hills, CA 94022
crichardson@losaltoshills.ca.gov

RECEIVED
OCT 19 2015
TOWN OF LOS ALTOS HILLS

Dear Ms. Richardson,

My name is Benjamin Sloss and I am submitting this written comment on the proposed mitigated negative declaration for the Stirling Subdivision, 28030 Natoma Road ("the Project") on behalf of my spouse and myself. My spouse Christine Sloss and I reside at 28025 Natoma Road in Los Altos and we contend that the current proposed design of the vehicle and pedestrian egress and ingress easement for the Project can and should be re-designed to minimize the removal of matured heritage oak trees fronting our property.

We recently received a notice of Los Altos Hills intent to adopt the mitigated negative declaration for the Project but did not receive a copy of the plans. After reviewing the access road improvements plans for the Project on line, we discovered that 1) instead of the 17 feet wide roadway necessary, the proposed easement roadway for the Project is 22 feet wide along its entire length, and in some places wider; and 2) numerous matured heritage oak trees lining the front of our property will be removed to accommodate the egress and ingress easement for the Project.

According to the Los Altos Hills General Plan for the Conservation Element adopted on April 26, 2007, heritage trees "are a valuable asset to the community because they beautify landscapes, increase property value, improve air quality, and reduce energy consumption." Additionally, the Town's Heritage Tree Ordinance protects large oaks and other trees determined to be of special significance. "Preserve and protect Heritage Trees, including native oaks and other significant trees, on public and private property." Policy 2.3 in the Conservation Element. Accordingly, programs have been established to enforce the Heritage Tree Ordinance including Program 2.4 in the Conservation Element to "[c]ontinue to refer site development applications to the Environmental Design Committee and Open Space Committee for review and comment." Pages 4 and 5 of the Conservation Element Los Altos hills General Plan are attached for your convenience.

These line of mature heritage oak trees that front our property provide us and several of our neighbors with shelter/shade and visually enhances the existing roadway. We believe that a re-design of the proposed roadway easement could save several of these oak trees and would provide an amicable solution between the Project developer and their adjoining neighbors. We are requesting that the Town of Los Altos Hills requires the Project's planning engineer to work

with a private architect, whom we will retain, to come up with an alternate design that will be acceptable to all parties. Also, we are requesting that the Project gets referred to the Environmental Design Committee and Open Space Committee for review and comment if that has not been done. Finally, we request that we be kept informed regarding the development and approval of the Project.

Our concerns and requests are also supported by our neighbors who have signed the bottom of this letter indicating their concern about the removal of the Heritage trees.

Thank you.

Very truly yours,

Benjamin Sloss

Benjamin Sloss
18 October 2015

Property Address	Signature of Property Owner
28065 Natoma Rd.	
Los Altos Hills	
13300 Simon Lane Los Altos Hills	Carol Kagansov
13313 Simon Lane Los Altos Hills	Masayuki Murakami

GOAL 2

Protect native and naturalized trees and plants.

Policy 2.1 **Minimize disturbance of the natural terrain and vegetation.**

Policy 2.2 **Preserve and protect native and naturalized plants, with special attention to preservation of unique, rare or endangered species and plant communities such as oak woodlands.**

Policy 2.3 **Preserve and protect Heritage Trees, including native oaks and other significant trees, on public and private property.**

Policy 2.4 **Encourage the planting of native trees and shrubs to provide a substantial buffer between the roadways and adjoining properties in harmony with the general character of the Town.**

Policy 2.5 **Encourage the removal and prevention of the spreading of aggressive exotics such as Italian thistle, stinkweed, pampas grass, acacia, yellow star thistle, French broom, Scotch broom and eucalyptus.**

Policy 2.6 **Encourage the removal of poison oak where allowed by law.**

Policy 2.7 **Avoid the development of environmentally sensitive areas that are rich in wildlife or of a fragile ecological nature, such as areas of rare or endangered species of plants, or riparian areas.**

Program 2.1 Continue to enforce the Heritage Tree Ordinance, which protects large oak trees and other significant trees by requiring a special permit for removal.

Program 2.2 Continue to require the replacement of any Heritage Oaks or other significant trees that are removed under special permit or as part of approved development projects.

Program 2.3 Continue to limit development within the dripline of Heritage Oaks.

Program 2.4 Continue to refer site development applications to the Environmental Design Committee and Open Space Committee for review and comment.

Program 2.5 Encourage the dedication of conservation/open space easements or the public acquisition of areas that are rich in wildlife or of a fragile ecological nature to ensure their protection.

Program 2.6 In the landscaping of individual sites and replanting where original vegetation has been destroyed or removed, encourage the use of native rather than exotic plants. In those areas of high fire risk, however, it may be preferable to introduce carefully chosen exotics with high fire resistance characteristics.

Program 2.7 Develop a program to manage and control invasive species, particularly along creeks and their associated riparian corridors.

RECEIVED

OCT 23 2015

TOWN OF LOS ALTOS HILLS

From: Kent Webb
13315 Simon Lane
Los Altos Hills, CA 94022

To: Suzanne Avila, Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills CA 94022

Date: October 23, 2015

Re: Comment on Stirling Subdivision Initial Study/Mitigated Negative Declaration

After reviewing the document for this project, I cannot agree that it meets the criteria for a proposed (mitigated) negative declaration. Specific issues are explained below.

Pre-Development Issues

Generally unsupervised pre-development of the Stirling property has already resulted in significant adverse environmental impacts. As a result of significant predevelopment clearing of native vegetation, including shrubs, grasses, small trees, the habitat supporting a once vibrant California quail population has been destroyed, resulting in the elimination of the species from the eastern portion of the property and neighboring properties (by observation), and perhaps the entire area. The wildlife-impermeable fencing along the eastern and northern boundary contributed to the decline by fragmenting the habitat. *This issue was not addressed in the document*. According to the Stanford Quail page: "In 1999, the National Audubon Society added them to their list of threatened bird species and the San Francisco chapter launched a "Save the Quail" campaign to counter habitat loss ... " Source: http://web.stanford.edu/group/stanfordbirds/art/species/bird/webQuail_California.html Attached.

A small population of gray foxes that were once observed on the eastern portion of the property has disappeared coincident with this predevelopment. Foxes rely on brush and other vegetation to evade coyotes. The widespread clearing of the property appears to be a likely cause related to the disappearance of foxes. Declining populations of bats and jack rabbits observed in the area are another likely consequence of recent unsupervised development.

The wildlife impermeable fence along east and northern boundaries was installed without adequate review from the Town. Representative of indifference to neighbors, concrete supports for the fence were built to extend onto neighboring properties, no notice of construction was provided. There were immediate adverse impacts from the fence on wildlife movement in the area. As one compromise to reduce these impacts negotiated by a Council member, a wildlife corridor was established as a small opening in the fence at the southwest corner of the property at 13315 Simon Lane, on the eastern boundary of Lot 2 in the development. Jack rabbits, deer and other animals use this opening. Without this corridor, animals moving east to west from the open space in the Stirling property to the open space of Poor Clares are funneled onto a blind curve at the entrance to the development at 28030 Natoma Rd, creating a traffic safety hazard for motorists and wildlife.

I am pleased to see the proposed subdivision map includes the removal of the existing fence and its replacement with wildlife permeable fencing. As a property owner at 13315 Simon Lane I am happy to

offer my support for the new wildlife-permeable fencing. Without other protections, however, the intent of the wildlife permeable fencing may be defeated; for example, perimeter impermeable fencing of lots in the subdivision would block all access to the sections of wildlife permeable fence. Perimeter fencing was opposed by the majority of Town residents in the 2011 fence survey currently available on the Town website. In the survey, 88.8% of the respondents also answered yes to the following question: "Is our rural environment and the protection of wildlife important to you?"

Summary: In order to comply with the proposed (mitigated) negative declaration for this project, the new wildlife permeable fence described in the Stirling Subdivision documents of September 14, 2015, would need additional conditions to protect its implied benefit, such as the implementation of the open space easement proposed by the Open Space Committee, a formally designated wildlife corridor, appropriate setbacks, and restrictions on type and location of any new fencing. Without other fencing restrictions, the intent of the wildlife permeable fence will not provide any mitigation for project impacts on established wildlife movement routes through the area. The project impact on California quail and jack rabbits has not been addressed in the report.

Aesthetics

In part c on page 23 of the report related to the "character or quality of the site and its surroundings" the report concludes that the development is consistent with residential use throughout the Town" and that "visual effects will be less than significant." In a previous meeting held with one of Stirlings attending by telephone, one of the Los Altos Hills residents, not an immediate neighbor, advised them not to try to maximize the number of lots in the project. That fewer lots would actually enhance the value of the project. He pointed out that people who want to live on a cul-de-sac live in Palo Alto or Los Altos. People wanting to live in Los Altos Hills are attracted by the rural nature of the Town.

The Town Environmental Design Committee has recommended setbacks along the eastern boundary of the development to reduce the negative visual impacts of this project. The report does not address the concerns raised by the Environmental Design Committee. The Pathways Committee also recommended an easement along the eastern border.

Sensitive Natural Communities

In part b. on page 50 of the report the following assertion is made: "The project would provide for the maximum feasible preservation of open space; protect areas necessary to the integrity of natural resources/processes; and preserve natural beauty and minimize disturbance of the natural terrain and vegetation." *This statement is clearly false*. Three of the Town advisory committees – Open Space, Pathways, and Environmental Design – have proposed additional easements providing more open space along the eastern boundary of the project. The indifference to the recommendations of Town committees evidenced by this comment in the report raises questions about the credibility of this document.

Wildlife Movement

This assertion in part d. on page 52, is not adequately supported by the associated information: "... EMC Planning Group biologists agree that even though this project will lead to changes in spatial use patterns of local common species of wildlife, this would not constitute a significant CEQA impact because the project will preserve approximately 40 percent of the project site ..." A single island of open space is not

sufficient to guarantee sustainable wildlife movement in an already highly fragmented environment. The organization Reliable Prosperity, a project of Ecotrust, offers the following guidance: "Multiple intersecting wildlife corridors offering multiple pathways between core reserves provide important resiliency to a wildlands network." Source: http://www.reliableprosperity.net/wildlife_corridors.html Attached.

A rigorous study of urban wildlife corridor connectivity provides this empirical conclusion related to the importance of multiple corridors: "Well-connected networks such as Network E have a lower probability of extinction; populations can recolonize with greater ease if they are highly connected (Schippers et al. 1996)... This high degree of connectivity is just as important to maintain regional biodiversity as are the sizes and or number of nodes (Noss 1983)." Source: "Rudd, H., Vala, J., and Schaefer, J.V., (2002). Importance of Backyard Habitat in a Comprehensive Biodiversity Conservation Strategy: A Connectivity Analysis of Urban Green Spaces. Restoration Ecology 10(2). p. 368-375. Attached.

The Town General Plan has identified wildlife linkages as an important consideration in planning new development. From page six of the Conservation Element of the General Plan, Wildlife Species and Habitat 135: "Areas that link wildlife habitat have become vital because native animals, such as deer, fox, bobcat and coyote, are prevented by roads, fences, homes and other development from moving freely as they once did ..." Also as noted in the Town's Wildlife Management Open Space Committee brochure. "New subdivisions, residences, and barrier fence can result in the breaking up of large blocks of habitat into smaller, disconnected, isolated pieces. This habitat fragmentation is one of the greatest threats to wildlife ..."

As noted earlier, without providing supporting conditions related to the proposed wildlife permeable fence, this document does not adequately address the issue of wildlife movement.

Transportation/Traffic

In part d. included in the table on page 82 the assessment of no impact related to "increase hazards due to a design uses" does not take into account the issue of wildlife movement. As previously mentioned, without the wildlife corridors implied by the proposed wildlife permeable fence, all animals moving from the subdivision to Poor Clares would be funneled onto a blind curve at the entrance of the project creating a traffic hazard. There are already wildlife movement traffic warning signs at this location. This traffic safety issue is not addressed in the document.

Mandatory Findings of Significance

In part a. included in the table on page 87 related to "substantially reduce the habitat of a fish or wildlife species" the conclusion is Less Than Significant Impact with Mitigation Measures Incorporated. As noted earlier, pre-development work on the site has already significantly reduced habitat resulting in the local disappearance of the California quail and the gray fox. Wildlife permeability of the entire project site, including multiple corridors that are implied by the proposed wildlife permeable fence, would be essential elements to mitigate further damage.

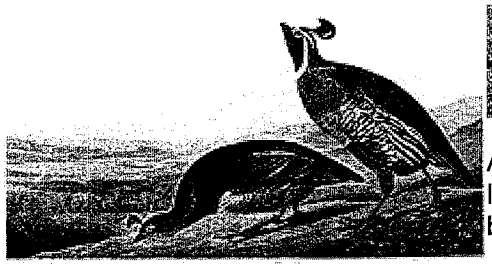
Because this is the last undeveloped parcel in the area to be developed, the environmental review must take into account impacts of previous development (e.g. other fences already put up and gridding off the whole neighborhood). The impact of this last development is significant in context with all the earlier development.

Stanford

Art at Exits:
Seeing Stanford Species

California Quail (*Callipepla californica*)

Narrative and Science Lens



Click on image to Enlarge

Audubon shows the female investigating what may be a Harvestman (or Daddylonglegs), an eight-legged arachnid that resembles a spider, but is not venomous. This scene is a little unusual since the birds usually eat seeds and foliage. These occasional hunters are themselves hunted. In San Francisco in 1881-82, for example, quail-on-toast went for thirty cents. More than 375,000 birds were shipped in from southern California that year, bringing hunters $32,000, or about a dollar per dozen.

Although considered hardy and adaptable, the popular birds were overhunted, and by 1885 targeting them was no longer profitable. Populations recovered, hunting has continued, some areas are artificially stocked, and today the bag limit within the state is 10 birds.

One measure of their adaptability is producing small broods during drought years, which reduces the risk of rearing young who will eventually starve (See below: Quail Eggs and Clover and Wheye drawing after Audubon). One measure of their popularity is their designation as California's state bird.

Campus Locations

Historically common throughout campus, but now extirpated from many areas. As recently as the early 1990s, coveys could be found in the Arboretum and around the Oval, but these have mostly disappeared. Sightings in the general area are now uncommon and declining, probably in response to predation, especially by cats, and reduced dispersal through the campus from "natural" areas. The birds are primarily seen either in southern portions of campus, where they forage in grassy habitats or under oaks and use dense brush and ornamental plantings for cover, around Lagunita, or in the Dish area.

Campus sustainability

By the 1960s Bay Area quail populations, which had been generally widespread and common were declining and heading toward local extinctions. In 1999, the National Audubon Society added them to their list of threatened bird species and the San Francisco chapter launched a "Save the Quail" campaign to counter habitat loss and predation by feral cats in Golden Gate Park, where the population had dropped to 12 from about 1,200. The Presidio, which has San Francisco's largest quail population, installed eight "Quail in Area, Drive Carefully" road signs and initiated monitoring projects and habitat restoration activities. Quail protection expanded across the city within a year, and the bird was designated San Francisco's official bird. Meanwhile, by the late 1980s statewide hunters were taking 2 million birds annually. On campus the birds are at risk to predation by cats and other urban-adapted predators, and habitat fragmentation, which reduces recolonization. The decline is apparent both on campus and in other more urbanized areas.

What you can do

1. Share your sightings—especially of the birds nesting on campus and try to keep a journal.

Reliable Prosperity

Society
- Fundamental Needs
  - Subsistence Rights
  - Shelter For All
  - Health
  - Access to Knowledge
- Community
  - Social Equity
  - Security
  - Cultural Diversity
  - Cultural Preservation
  - Sense of Place
  - Beauty and Play
  - Just Transitions
  - Civic Society

Nature
- Ecological Land-Use
  - Connected Wildlands
    - Core Reserves
    - Wildlife Corridors
    - Buffer Zones
  - Productive Rural Areas
    - Agriculture
    - Forestry
    - Fisheries
    - Ecotourism
  - Compact Towns and Cities
    - Human-Scale Neighborhoods
    - Green Building
    - Transit Access
    - Ecological Infrastructure
    - Urban Growth Boundaries
- Ecosystem Services
  - Watershed Services
  - Soil Services
  - Climate Services
  - Biodiversity

Capital
- Household Economies
- Green Business
  - Long-Term Profitability
  - Community Benefit

Wildlife Corridors

Wildlife corridors are necessary because they maintain biodiversity, allow populations to interbreed, and provide access to larger habitats.

Coastal estuaries, such as this one on the Khutze River on British Columbia's mainland coast, are vital as a spring-time food source for coastal grizzly bears.
Image by Adrian Dorst.

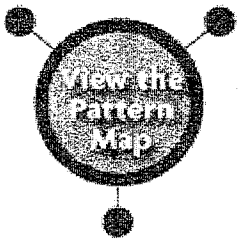
Wildlife corridors connecting core reserves are crucial since they increase the effective amount of habitat that is available for species and effectively reverse habitat fragmentation. This is especially important for migratory animals and those with large home ranges. Larger habitats support greater biodiversity, larger populations, and a wider range of food sources and shelter. They also allow populations to interbreed, improving long-term genetic viability. However, Wildlife Corridors cannot substitute for large areas of protected habitat like those in core reserve systems.

At the largest scale, Wildlife Corridors must be wide enough to allow easy movement for even the largest mammals, including grizzlies, cougars, and wolves. Widths of several miles are typical. However, Wildlife Corridors can serve at smaller scales to provide habitat connectivity for other species, including amphibians, fish, and birds. They are particularly beneficial along riparian corridors, where they provide both aquatic and terrestrial connectivity. In urban areas, they can provide significant recreational opportunities and important linkages in a highly fragmented landscape. Whenever possible, urban and rural parks and open spaces should be linked to form functional Wildlife Corridors, which can then be joined to outlying core reserves.

Since wildlife corridors are typically narrow and vulnerable, they must be managed with extreme caution. For instance, pesticide use next to a corridor might have destructive impacts on pollinators, in turn reducing plant diversity. In many cases, ecological forestry, agriculture, and other non-extractive land-uses can be made compatible with wildlife corridors with special management practices acknowledging the needs of species using the corridor.

When roads or other infrastructure cross a Wildlife Corridor, it is essential to maintain transportation connections that do not diminish the effectiveness of the corridor. Multiple intersecting wildlife corridors offering multiple pathways between core reserves provide important resiliency to a wildlands network.

Green Procurement
Renewable Energy
Materials Cycles
Resource Efficiency
Waste as Resource
Product as Service
Local Economies
Value-Added Production
Rural-Urban Linkages
Local Assets
Bioregional Economies
Fair Trade
True Cost Pricing
Product Labeling



identify critical existing or potential wildlife corridors between core reserves, protect them, and mange them for ecosystem connectivity.

CASE STUDIES

EXAMPLES OF THIS PATTERN IN ACTION:

Mattole Valley wildlife "mosaic"
For watershed organizing and restoration, the Mattole Restoration Council of Northern California stands out as a pioneering model. In this classic article of bioregional literature, Freeman House, one of the initiators of the Mattole effort, details the Council's history and broader lessons drawn from that experience. This article appeared in Whole Earth Review, Spring 1990.

I-90 Ocean to Mountain Corridor
The Greenway Education Program focuses on the challenge of sustaining a healthy, natural environment in balance with the needs of a growing population. A key element of the Greenway plan is preserving forests along the Interstate 90 corridor in Washington State.

Victoria's Sea-to-Sea Green/Blue Belt Alliance
A greenbelt of wilderness and parkland from Goldstream Park to the Sooke Basin. One of the links is a small property between Ayum Creek and the Galloping Goose trail. Sea-to-Sea Green/Blue Belt Alliance (a new coalition of seven local conservation organizations).

ORGANIZATIONS WHOSE WORK INCORPORATE THIS PATTERN:

American Wildlands

The Wildlands Project

Yellowstone to Yukon

REFERENCES:

Hudson, W.E. *Landscape Linkages and Biodiversity*. Island Press. Washington, DC. 1991.

Little, C.E. *Greenways for America*. John Hopkins University Press. Baltimore, MD. 1990.

Smith, Daniel S and Paul Cawood Hellmund, eds.. *Ecology of Greenways: Design and Function of Linear Conservation Areas*. University of Minnesota Press. Minneapolis, MN. 1993.

Importance of Backyard Habitat in a Comprehensive Biodiversity Conservation Strategy: A Connectivity Analysis of Urban Green Spaces

Hillary Rudd[1]
Jamie Vala[1]
Valentin Schaefer[1,2]

Abstract

Connectivity has been an accepted goal in ecological restoration of wilderness areas for some time, but it is a relatively new approach in urban areas. The connectivity analysis presented here explores the numbers and patterns of corridors required to connect urban green spaces as part of an overall biodiversity conservation strategy. Green spaces in this study were weighted based on size and a habitat requirement of 0.5 ha for a hypothetical indicator species. Thirteen potential networks were evaluated using Gamma, Beta, and Cost Ratio indices. The study zone contained 54 green spaces (habitat nodes) with a combined area of 636.5 ha in a total urban area of approximately 2,600 ha. Several models (Travelling Salesman, Paul Revere, and Least Cost to User) were used to evaluate possible connections. These results indicated that at least 325 linkages are necessary to connect half of the nodes. Such large numbers of linkages are only feasible by enhancing the matrix of backyard habitat, planted boulevards, and utility rights-of way found in a city. Strengthening such networks should work well to support the biota protected in urban parks and wildlife refuges and the seasonal migrants that sometimes depend on urban habitats for their survival.

Key words: backyard habitat, connectivity, corridors, Greater Vancouver, green space, habitat matrix, urban ecology.

[1]Douglas College Centre for Environmental Studies and Urban Ecology, P.O. Box 2503, New Westminster, British Columbia, Canada V3L 5B2
[2]Corresponding author: Tel.: (604) 527-5224; Fax: (604) 527-5095; E-mail: val_schaefer@douglas.bc.ca

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Introduction

Habitat loss and fragmentation are important factors contributing to a reduction in the planet's biodiversity (Rolstad 1991). Besides resource extraction in mining, fishing, and forestry, most habitat loss and fragmentation is due to urban and agricultural development. The population of Greater Vancouver, British Columbia is expected to increase from its present 2 million to 3.1 million people within 20 years. Globally, the world's population is expected to increase from the present 6 billion people to 10 billion by the year 2050, mostly in urban areas. Many urban regions are in biologically sensitive areas. Increased habitat fragmentation is of particular concern in Greater Vancouver because it is located on the Fraser River estuary. This estuary is home to the world's largest salmon run and is one of three major stops on the Pacific Flyway for migratory birds along the west coast of North America. The region has already suffered substantial habitat loss. One prominent estimate is that about 70% of the wetlands and 80% of the salt marshes found here historically were already lost by the turn of the twentieth century, mainly through diking (Fraser River Estuary Study Steering Committee 1978).

Although habitat loss and isolation result in reductions in smaller natural populations and more local extinctions (Adams & Dove 1989; Rolstad 1991), ecosystem fragments remaining in cities are far more important than their limited size and disturbed state might suggest (Gilbert 1987; Schaefer 1994). In fact, habitat fragments contribute significantly to the viability of the greater ecosystem as part of metapopulations—assemblages of local populations that are connected by migration (Hanski & Gilpin 1991). It is clear from metapopulation theory that the greater the number of patches and the closer they are, the better the colonization (Hanski & Thomas 1994). Seed dispersal and wildlife movements are key processes in determining the survival of metapopulations. Such movements are directly related to the connectivity of the landscape (Schippers et al. 1996). As wildlife moves between nodes or islands, extinction and colonization rates are equalized within fragmented landscapes (Bueno et al. 1995). A concern about urban habitat restoration is that it may lead to habitat sinks, attracting wildlife from good source ecosystems to marginal habi-

Greater Vancouver. The area is largely self-contained with significant barriers to the movement of biota, bounded by major roads: Lougheed Highway, North Road, Clark Road, St. John's Street, and Barnet Highway (Fig. 1). This area was chosen because the Institute of Urban Ecology's Green Links project already has one corridor in Coquitlam linking several green spaces (including the large mother node of Mundy Park) and is interested in evaluating other potential links in this area. Table 1 lists the green spaces included in this study and their sizes in hectares.

Assumptions

The nodal analysis requires a minimum area for an indicator species. Choosing a specific indicator species was problematic, so half a hectare was arbitrarily chosen as a hypothetical minimum area requirement. Other studies have determined that most species found in urban areas require at least half a hectare for their minimum habitat requirements. For example, the smallest patch occupied by the Tawny Owl, *Strix aluco*, was 0.3 ha (Redpath 1995); the bank vole, *Clethrionomys glareolus*, is found in areas smaller than 0.3 ha (van Apeldoorn et al. 1992) and Townsends vole, *Microtus townsendii*, is found in areas as small as 0.18 ha (Harris 1984). Robbins et al. (1989) determined that the American Robin, *Turdus migratorius*, the Common Yellowthroat, *Geothlypis trichas*, and the Gray Catbird, *Dumetella carolinesis*, are all found in areas of less than 0.3 ha. Half a hectare was chosen to encompass a wider range of species.

Minimum distances, as the crow flies, between green spaces were measured instead of centroid distances. Centroid distances are measured from the geometric center of one green space to another. This approach simplifies the analysis and gives a more accurate picture of the interactions between nodes. This is especially true for nodes that are close together where minimum distances more accurately reflect distances that must be crossed by biota rather than using centroid distances, which are much further apart.

Nodal Analysis

The gravity model is used to evaluate the level of interaction between the nodes (Linehan et al. 1995). With this model, nodal weight determines the relative significance of the nodes in the study area with reference to the minimum habitat requirement (Linehan et al. 1995).

$$N_a = [x(\text{ha}) / s(\text{ha})] \times 10$$

where N_a is the nodal weight for the green space, x is the area of the green space measured in hectares, and s is the minimum area required for the indicator species. Multiplying by 10 normalizes the data. For example, Mundy Creek has an area of 11.5 ha. Dividing this area by 0.5 ha (the habitat requirement for the hypothetical indicator species chosen for this study) and multiplying by 10 gives the nodal weight of 230. There will be no nodal weights with a value less than 1 (unless the green space is less than 0.05 ha).

Connectivity Analysis

Generally, areas have a greater interaction when they are larger and closer together (Linehan et al. 1995). Connectivity using the gravity model (G_{ab}) is determined as follows:

$$G_{ab} = (N_a \times N_b) / D_{ab}^2$$

where G_{ab} is the level of interaction between nodes a and b, N_a is the nodal weight of node a, N_b is the nodal weight of node b, and D_{ab} is the distance between nodes a and b. The gravity model provides an unbiased method to determine different levels of interactions between nodes.

Network Generation

Several potential networks can be generated and evaluated. Figure 2 shows some of the most common types of networks. There are two major groups of network models, branching and circuit. An example of a branching network is the Paul Revere model (Linehan et al. 1995), one of the simplest network models connecting all nodes. It is also the cheapest to create for the group concerned with creating the network.

The other family of networks is circuit networks (Fig. 2). These networks tend to be more complex than branching networks and often represent a lower cost to the user: the flora and fauna using the green spaces as their habitat and benefiting from the networks. Examples include the Travelling Salesman and the Least Cost to User (Linehan et al. 1995). The Travelling Salesman is the simplest, where each node is connected only to two other nodes. The Least Cost to User is the most complex network model because all nodes are directly connected to each other. Networks from both families are evaluated using the Gamma, Beta, and Cost Ratio indices described in the next section.

The networks were generated using MATLAB (version 5.2.0.3084, Math Works Inc.), a high level programming language. A Monte Carlo random search technique was used to determine an estimate of the most effective networks. The program searches for the best linkages, but depending on the random starting point and the path chosen it produces different results. The program ran hundreds of times to produce the best possible results. The models presented below represent the results after the program ran for 5 hr. At this point the results had stabilized, and it is likely that no better result would be found.

were 26 green spaces with nodal weights greater than 100, 11 greater than 250, and 5 greater than 500 (Table 1).

Nodal weights ranged from 2.00 to 3483.36 (Table 1). These weights reflect the different sizes of the green spaces and indicate their importance in the study area relative to the minimum habitat requirement of 0.5 ha. The average nodal weight for this project is 235.74 (Table 2). The nodal weight of 250 was chosen as a criterion for evaluation because it is close to the average and it represents half of the green spaces studied. Nodal weights of 100 and 500 were chosen to evaluate significantly more and less green space without including or excluding all of them. Table 2 summarizes the mean and standard deviation of the sizes and nodal weights of the green spaces in the study area.

The connectivity analysis shows the level of interaction between each of the green spaces in the study area. These results were used in the network analysis. The values range in magnitude from 10^{-1} to 10^{9}.

The analysis tested the Paul Revere, Travelling Salesman, and the Least Cost to User network models. Four different node configurations were examined for each of the above models: the maximum number of nodes (54) and nodes with a weight greater than 100, 250, and 500, respectively. A total of 13 different network scenarios were possible (Networks A-M). The Gamma, Beta, and Cost Ratio indices were then used to evaluate each of the scenarios (Table 3).

Network A connects all green spaces in the study area, including those less than 0.02 km apart from each other. Network B excludes those green spaces that are 0.02 km apart but connects the rest of them. The green spaces that are 0.02 km apart are structurally connected. These areas are close enough together that there is already a corridor and movement can easily occur (Fahrig & Merriam 1985). However, this depends on the species using the corridor and its specific requirements (Bennett et al. 1994) and whether the discontinuity is an impenetrable barrier (e.g., a busy freeway).

Network A is the best network model as the Gamma is 1, the Beta is 26.5, and the Cost Ratio is 0.62 (Table 3). This indicates the highest possible complexity and the greatest degree of connectivity. Network B is the second best model with similar index values. However, Networks A and B, with 1,431 and 1,403 links, respectively, may in fact require continuous habitat joining nodes.

Table 2. Summary of statistics for green space size and nodal weight.

Statistic	*Size (ha)*	*Nodal Weight*
Mean	11.79	235.74
SD	25.60	512.09

There are three networks that represent the most optimistic and realistic choices for the study area. These networks have an unadjusted Gamma of 0.04 or larger, a Beta greater than 1, and a Cost Ratio greater than 0.45. Network D joins 54 nodes with 54 links. It is one complete circuit and is moderately complex. Of all the networks, D represents the network with the greatest ease of use for the user.

Networks E, F, and G include only nodes with weights greater than 100. Network E joins 26 nodes with 325 links. With a Beta of 12.5, and the cost to both the builder (e.g., people) and the user (e.g., wildlife) being equalized, it is a complex network.

Networks H, I, and J include only nodes with a nodal weight greater than 250. Network H joins 11 nodes with 55 links. It has a Beta of 5 and a Cost Ratio of 0.46. The cost to the builder and user is almost equal and represents more than one circuit. In Networks E and H, the user has more than one option for dispersal between the green spaces.

Networks K, L, and M use the criterion of a nodal weight greater than 500, resulting in only five nodes and a maximum of 10 links. This is unsuitable to gain significant connectivity between green spaces. Other unsuitable networks are those that have a Gamma index of less than 0.04, a Beta index of less than 1, and a Cost Ratio that bears a significant cost to the user (under 0.4).

Discussion

Network E represents the best option. It uses half of the nodes and has a high degree of connectivity. Although Network E's 325 links seems unattainable in an urban environment, the distance between many of the nodes is small and is realistic for this area. The small distances between nodes enables the large number of links to be created through backyard habitat enhancement, forming a matrix of pathways through the zone.

Network E also encompasses the entire study area, whereas some of the networks only include portions of the study area. Backyard habitat creation is the best approach to creating the largest ecosystem areas within a zone. Green spaces with nodal weights of less than 100 may also be included in Network E, because these smaller nodes will become part of the corridors between the major nodes of the network.

Well-connected networks such as Network E have a lower probability of extinction; populations can recolonize with greater ease if they are highly connected (Schippers et al. 1996). Network E has 325 links connecting half the nodes in the study area. This high degree of connectivity is just as important to maintain regional biodiversity as are the sizes and or number of nodes (Noss 1983). Dispersal between nodes, which is simpler

numbers of species on their own but are able to provide important peripheral habitat to species in the mother node (Hansson 1991). Satellite nodes are partly or entirely dependent on individuals immigrating from the mother node (Hansson 1991). They have a higher rate of extinction than the mother nodes and therefore need to be repopulated constantly (van Apeldoorn et al. 1992). This requires proximity to the mother node. As the urban environment becomes increasingly more fragmented, satellite nodes are getting smaller and farther away from the mother node, making dispersal even more difficult. As a way of preserving the biological integrity of a landscape, corridors and habitat matrices must be in place to allow dispersal between green spaces.

Mundy Park is the mother node for this study area. It is the largest park in the area and has the largest nodal weight and therefore the greatest influence over the surrounding green spaces. Mundy Park has a variety of different habitat types: wetland, coniferous forests, deciduous forests, and fields. Because the satellite nodes also vary in their habitat types, the variety of flora and fauna in each of Mundy Park's habitat types is also able to use the different satellite nodes to the fullest extent. The corridors could allow for dispersal between Mundy Park and the other nodes. Although no studies have been done on dispersal from Mundy Park to its satellite nodes, it is well documented that mother nodes provide a base for dispersal, and corridors aid in this dispersal (Hobbs & Saunders 1990; Taylor et al. 1993; Bennett et al. 1994; Beier & Noss 1998). This is why it is important to have a complex network. More links equal more routes to suitable habitat, creating more opportunities for dispersal. This is important because suitable habitat often remain unused if isolated (Hanski & Thomas 1994).

Another very important component of network planning is the consideration of private and unprotected areas. Backyard habitat can be an invaluable food and habitat source for a wide range of urban species and is essential in developing the matrix that supports the large numbers of corridors required for connectivity. Public education on gardening with native plants and providing proper habitat is another tool to enhance the connectivity of the region and improve the viability of the corridors. This is crucial in urban areas because of existing development and lack of green space.

This study is a general analysis that examines the structural connectivity of the landscape. The literature is not consistent in the definition of connectivity. Taylor et al. (1993) defines landscape connectivity "as the degree to which the landscape facilitates or impedes movement among resource patches," whereas connectedness refers to structural or physical connections between patches or nodes. Where resources are available future studies should concentrate on connectivity rather than connectedness. However, this poses another problem because examining connectivity is usually conducted on a single species (e.g., Bennett et al. 1994) and the results may not be transferable to all species in an area. Analyzing structural connectivity may present more general results. Future work in this area should use a species–area curve to determine a more accurate minimum habitat size requirement for urban species. Species lists from a variety of urban parks of varying sizes can be obtained and plotted to develop a species–area curve that is appropriate for urban habitats. Once all green spaces in the area have been identified, it would be useful to evaluate the quality of the nodes when resources are available. There is a possibility that some municipal parks may not provide suitable habitat for flora and fauna.

The analysis presented here gives a solid foundation for developing a greenway network in urban areas. This can be applied to other areas throughout Greater Vancouver and cities around the world.

Acknowledgments

We thank Lea-Ann Locker for the initial background work on the connectivity analysis, Mark Fallat for his help with writing and running the MATLAB program, and Mike Esovoloff from the City of Coquitlam for supplying us with maps of the study area. Susan Osterle provided comments on the final manuscript.

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Suzanne Avila, Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

10/23/2015

Re: Initial Study/Mitigated Negative Declaration, Stirling Subdivision

I am submitting comments as a concerned resident who lives adjacent to the proposed 9 lot subdivision and whose property will be impacted by it.

1. AESTHETICS

a. Scenic Vista and
c: Visual Character

This report fails to adequately identify, analyze and mitigate the projects potentially significant adverse impacts on the scenic views of existing properties, in particular on existing residences on adjacent properties along the eastern border.

If not the most scenic of all views in the area; a view that includes the western hills, the canopy of Matadero Creek, a succession of local hills as far as the Redwood City hills including views of "The Cross" and broad views of Skyline Ridge, owners of adjacent properties East of proposed lots 1,2,3,4 enjoy views that are highly sought after and are significant to the property values of those residences.

In fact the website for the sellers of the proposed subdivision property itself, is not at all understated about the significance of Scenic Vista; it is one of its primary selling points:

"Miles of unobstructed views... and wide commanding panoramas of mountain ranges, rolling hills and valleys." (www.debijoy.com)

The MND devotes a single paragraph to Scenic Vista:

1. Aesthetics

    a. Scenic Vista. "A scenic vista is generally described as a clear, expansive view of significant regional features possessing visual and aesthetic qualities of value to the community. There are no individual scenic vista points or locations identified in the Town General Plan that warrant special consideration and none identified on or near the project site. Therefore, the proposed project would not impact a scenic vista."

Since the proposed subdivision lots, 1, 2, 3 and 4, immediately to the West of four existing residences are largely level as are the four adjacent residences, each at a similar elevation, the four residences will therefore have real potential for view obstruction or negative impact. Views of these residences while not specified in the General Plan as this reports states, are highly significant views nonetheless. It is highly unlikely that anyone would not consider Skyline Ridge to be a view that qualifies as a scenic vista and that would not warrant consideration.

By stating that "There are no individual scenic vista points or locations identified in the LAH General Plan," this report appears to place the onus on the Town's documentation rather than assessing the actual views from the property itself. If one of the primary selling points of this property was "scenic vista" then the conclusion of this report with respect to Scenic Vista aesthetics appears to be in conflict. I also question why only the General Plan was used as the reference in this report, omitting the Town's municipal code requirements.

10-2.701 Purposes. (LAH Municipal Code)
The purposes of this article are to insure that the site, location and configuration of structures are unobtrusive when viewed from off-site; **that scenic views are retained; that buildings do not dominate the natural landscape;** that ridgelines and hilltops are preserved;

Because there is no description of the proposed height of the structures to be built, particularly on lots 1, 2, 3 and 4, it is not possible to assume there will be no obstruction of view from the surrounding properties.

Heritage tree views

Existing residences adjacent to proposed lots 1 through 4 are also highly impacted by views of the property itself including the heritage oaks that exist throughout the entire property and as mentioned, the extensive canopy of Matadero Creek. In at least one case, the proximity of heritage oaks was a primary reason for the purchase of one resident's property over 25 years ago.

(It should be noted that all residents adjacent to this subdivision have lived alongside this property for 27, 30, 35, and 45 years.)

The seller's website includes the importance of the oaks on the property as a selling point:

... ancient white (Valley) oaks provide a safe haven and an invitation to participate in the natural and restorative.

This report fails to include any mention of heritage trees or other views in Aesthetics 1a through 1d.

Considering that the Town places value on heritage trees, and presumably view of them by including designation of these trees in the municipal code, this omission should be addressed.

12-2.502 (a) The Zoning Administrator, the Site Development Committee, the Subdivision Committee, the Planning Commission, and the City Council. in reviewing development proposals or subdivisions, shall seek to preserve and protect existing trees, especially Heritage Oaks and heritage trees, from unnecessary removal or damage by placing conditions on development approvals.

The MND states that the project will have "less than significant impact" on aesthetics but provides no analysis to support this. The IS/MND fails to identify scenic views that will be adversely affected and simply states (pg. 23) that the visual character of the Town is rural residential and that the nine new houses that will be built on the site will be reviewed by the Town to meet zoning and design standards. "*This will assure that the visual effects will be less than significant.*" The IS/MND does not describe the existing scenic views and other visual resources or provide any analyses of the temporary and permanent changes in visual resources the proposed project will create. This typically includes photos of existing scenic views in the vicinity and photo simulations of the views after the new houses are constructed

Under the proposed plans, both near views of the project site and expansive scenic views of hillsides and Skyline ridge would be permanently altered by the subdivision and construction of nine new homes. The impact is especially significant from the eastern side of the subdivision. With allowable roof heights of up to 32 feet, property line setbacks of 30 feet, and landscape screening allowed along property lines, the existing views from residences along the eastern border may be obstructed by the new homes on Lots 1-4.

Because the MND does not identify visual impacts, no mitigation is described.

LAH Site Development Ordinances;
LAH Subdivision Ordinances
9.1.102 Purposes and Objectives

a) To insure the development of land in a manner consistent with the general community objectives set forth in the General Plan;

d) To preserve and protect the natural beauty and the established character o the community, and through good design, to provide for harmonious relationship between completed subdivisions and the natural environment.

9.1.05 Tentative Maps: Purpose

...Special concern and scrutiny will be paid to the relationship of the subject property to surrounding properties.

It is the intent of this article to generate an accurate portrayal of how, and to what degree, the proposed subdivision will alter the natural state of the undeveloped land. To the degree that the natural amenities, characteristics, topography, vegetation and wildlife, are preserved, the probability of acceptance of a given subdivision will be enhanced.

Mitigation could be provided by modifying the tentative map to include the 25- to 30-foot wide open space or pathway easement along the eastern border of the subdivision recommended by the LAH Open Space Committee, the Environmental Design Committee, and Pathways Committee. (See committees' recommendations.) This easement would mitigate to some extent adverse impacts of the subdivision on the existing visual character of the site and *preserve and protect the natural beauty and the established character*" of the site, as LAH Subdivision ordinances require.
In addition require building setbacks to be 20 or 30 feet from the inner easement border 30-foot setback from the easement on the eastern border (total building setback from property line would be 50-60 feet). This would move the new houses further down the hill where they will not obstruct as much of the view from the adjacent properties.

The new road and nine new driveways that will be constructed have potential to create new sources of nighttime light and glare—specifically car headlights shining into existing residences on the adjacent properties. Removal of trees for the road and from building sites will increase the impact. Mitigation should include specific direction to give careful consideration to new driveway locations so they will not present a new intrusive source of light from vehicle headlights. This potential impact is not addressed in the report.

In summary, this report fails to adequately address the importance of 1. Aesthetics to the surrounding properties of this proposed subdivision.

Views from 13315 Simon Lane

4. BIOLOGICAL RESOURCES

The IS/MNDreport fails to adequately identify and analyze the projects potentially significant adverse effects on established wildlife movement routes. The MND categorizes area as "Less than significant impact."

Most residents that border the proposed subdivision, are aware that it is a highly wildlife sensitive area. The significance of the 18 acre parcel is it is virtually untouched. It provides a water source (Matadero Creek) shelter and sustenance for a wide variety of wildlife. Inhabitants and visitors include Great Horned owls, Barn owls, Red Tailed hawks, coyotes, deer, bobcats, jackrabbits, many other species of small animals, reptiles and birds.

The open grassland of the property, primarily comprised of wild oats and other types of vegetation has for decades provided sustenance for wildlife in the area. Heritage valley oaks provide roosts, cover, roughage from leaves and in the Fall, acorns which account for much of herbivore diets during the fall/winter months.

California has placed a premium on the importance of wildlife corridors: (https://www.wildlife.ca.gov/conservation/planning/connectivity/CEHC, CA Department of Transportation, CA Department of Fish and Wildlife.) This 18+ acre parcel has provided a locally arguably a vital link in this corridor system. The largely untouched property is a critical hub for wildlife travel between the major open space areas in town; Poor Clares, Foothills Park, Arastradero Preserve, Byrne Preserve. The IS/MND report contends that wildlife will travel through the area via the creek (Live Oak Associates) however as many hunters are aware, prey animals avoid riparian areas at night when possible, preferring open spaces for the best chance of survival.

As previously stated, the State of California has attached high importance to the preservation and maintenance of Wildlife corridor links or linkages. The words link or linkages are referenced 400+ times in, "California Essential Habitat Project (CA Department of Transportation, CA Department of Fish and Wildlife) produced as a result of the rapidly increasing fragmentation.

- The word "link or linkages" is not mentioned once in this report.
- The word fragmentation is mentioned once.
- The word migration is not included in the report.

In addition to State documents, the report fails to address the Open Space Committee recommendations with respect to wildlife movement. The word path or pathways is mentioned 2 times as it pertains to wildlife movement in the body of the report (4.d) and is in reference to LOA comments.

The IS/MND report fails to address the 2006 LOA Wildlife Corridor Study recommendations regarding planning area and blockage to movement of terrestrial animals as well as the recommendations by LOA regarding allowances for wildlife between properties in wildlife sensitive areas.

The report fails to address the impact on surrounding properties that will occur when large numbers of existing ground-dwelling animals are displaced by construction and subsequent conversion of wildlife habitat to human residences, including jackrabbits, cottontails, snakes, ground squirrels and other small mammal and reptiles.

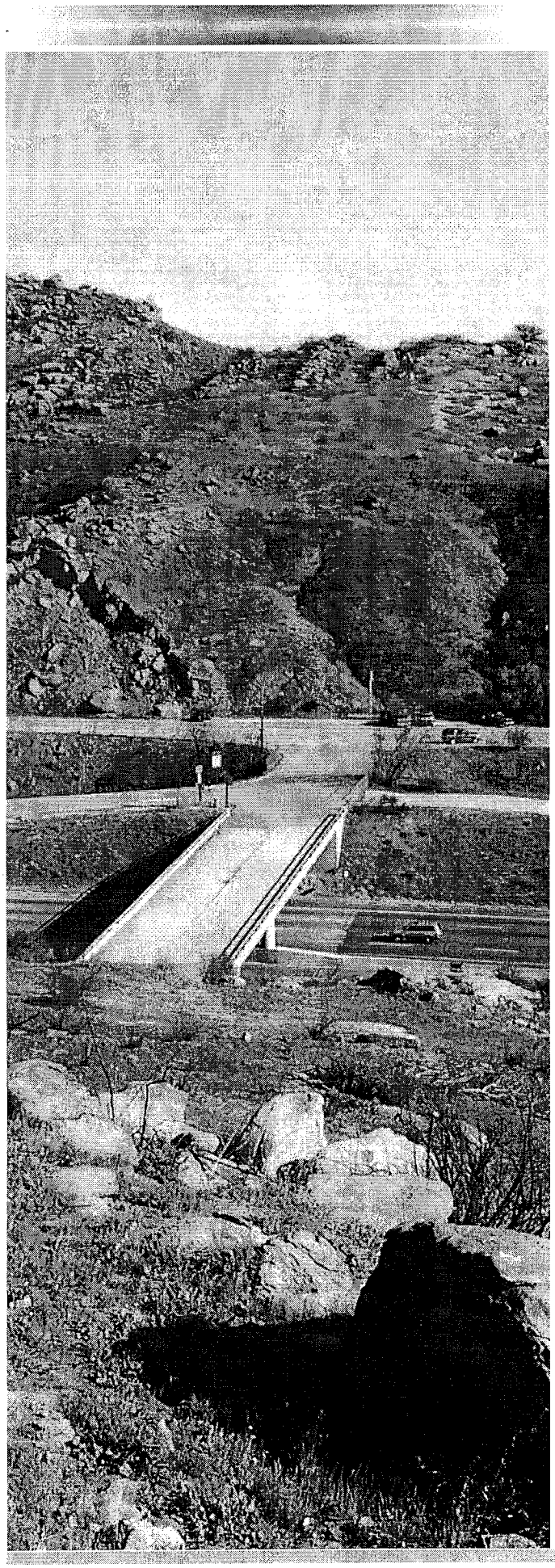
The IS/MND report concludes this development proposal causes less than significant impact (4.d.) therefore no mitigation measures are offered.

In summary I believe this report fails to adequately address the impacts on adjacent and surrounding properties with respect to Aesthetics, Biological Resources, Mandatory Findings of Significance as well as other environmental impacts including noise, tree removal and creek impact, not addressed in this letter. I will submit an additional letter with comments prior to the Planning Commission meeting as I understand is permitted.

Sincerely,

Alice Sakamoto
13315 Simon Lane

Alice Sakamoto



California Essential Habitat Connectivity Project:

A Strategy for Conserving a Connected California

February 2010

Prepared for:

California Department of Transportation
California Department of Fish and Game

With Funding From:
Federal Highways Administration

LIVE OAK ASSOCIATES, INC.

an Ecological Consulting Firm

THE TOWN OF LOS ALTOS HILLS WILDLIFE CORRIDOR STUDY

Prepared by:

Live Oak Associates, Inc.

Rick A. Hopkins, Ph.D., Principal, Senior Biologist
Michele Korpos, B.A., Project Manager, Wildlife Ecologist

Prepared for:

Mr. Roger Spreen
LAH Open Space Chair
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, California 94022

18 December 2006

Project No. 789-01

San Jose Office: 6840 Via Del Oro, Suite 205 • San Jose, CA 95119 • Phone: 408-281-5885 • Fax: 408-224-1411
Oakhurst Office: P.O. Box 2697 • 49430 Road 426, Suite B • Oakhurst, CA 93644 • Phone: 559-642-4880 • Fax: 559-642-4883

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NOV 13 2014

TOWN OF LOS ALTOS HILLS

November 11, 2014

Jeff Peterson, P.E.
Principal
3130 La Selva Street, Suite 100
San Mateo, CA 94403

RE: Analysis and recommendations regarding the comments from the Town of Los Altos Hills regarding proposed development on the Stirling Property

Dear Jeff:

Per your request and that of the Stirling Family, Live Oak Associates, Inc. (LOA) has prepared a technical analysis of how the proposed development on the Project Site, accommodates local wildlife and their ability to move amongst the larger open space preserves in this region. The Stirling Project Site is situated on an approximately 18-acre site at 28030 Natoma Road (Stirling Project Site) in Los Altos Hills, California. As we understand it, the proposed project would develop 9 lots ranging in size from approximately 1-acre to more than 3 acres. Over 7 acres of the western portion of the site (approximately 40%) would be preserved via an easement protecting the steeper sloped wooded areas of the site that include a tributary to Matadero Creek.

The Town of Los Altos Hills (LAH) staff has provided several comments on the proposed development, many of them focusing on the occurrence of various species of native wildlife (e.g., black-tailed deer, coyote, foxes, etc.) and how the site may function in a larger context as providing connections amongst suitable habitats within LAH and regional open space preserves. Therefore, our primary objective is to evaluate whether or not the proposed project will adversely degrade or constrain regional wildlife movement patterns. This analysis relies not only on the principals as outlined in CEQA, Appendix G, but also the LAH Municipal Code, General Plan Policies, and guiding principals as established by the LAH Open Space Committee

At the beginning of the year (January 20, 2014) the LAH Open Space Committee identified the site as an "...environmentally valuable and sensitive.." area for the Town. They went on to note what they believed to be important elements of the site such that it:

- Includes a major creek corridor.
- Has extensive steep slopes
- Has mature oak woodlands
- Provides significant wildlife habitat
- Serves as a critical hub for wildlife movement between the major open space areas in this part of the Town, linking Arastradero Preserve, Matadero Creek, Poor Clare's area and Byrne Preserve.
- Has a steep, heavily vegetated swale creating a creek tributary.

San Jose: 6840 Via del Oro, Suite 220 • San Jose, CA 95119 • Phone: (408) 224-8300 • Fax: (408) 224-1411
Oakhurst: P.O. Box 2697 • 39930 Sierra Way, Suite B • Oakhurst, CA 93644 • Phone: (559) 642-4880 • Fax: (559) 642-4883
Bakersfield: 8200 Stockdale Highway, M10-293 • Bakersfield, CA 93311

Suzanne Avila

From: Jeff Peterson, PE <jpeterson@wilseyham.com>
Sent: Friday, October 23, 2015 2:06 PM
To: Suzanne Avila
Cc: Rosy Ko (rosy.ko@gmail.com)
Subject: Ko Subdivision Environmental Document

Hi Suzanne,

One of the biologists that we have been talking with about the project expressed concern about the language in Mitigation Measure BIO-4b which reads: b) A biologist qualified to assess and monitor CRLF shall be approved by CDFW and USFWS prior to the start of construction activities.

They recommended the language be changed to: Prior to the start of construction activities, the Town will confirm that a qualified biologist [i.e. holding a valid USFWS 10(a)(1)(A) permit for the CRLF] has been hired by the project proponent to assess and monitor the species within portions of the project site to be actively graded.

The reason for their recommended language change is that gaining simple approval from the USFWS is often a very lengthy process simply due to the workload of agency staff. That agency also may not respond to such requests without the project being involved in some form of Section 7 consultation, which can take a year or more to complete. The frog is not state listed as endangered or threatened by CDFW.

For clarification: Section 10(a)(1)(A) of the ESA is for scientific research on a listed species or activities to enhance a listed species propagation or survival a Section 10(a)(1)(A) permit is required. Examples include, but are not limited to: abundance surveys, genetic research, relocations, capture and marking, and telemetric monitoring.

I would like to submit this as a comment to the Environmental Document.

Let me know if you would like to discuss it.

Best regards,

Jeff

Jeff Peterson, P.E.
Principal

WILSEY HAM
Engineering, Surveying & Planning

3130 La Selva Street, Suite 100
San Mateo, CA 94403
650.349.2151 main
650.286.8415 direct
650.345.4921 fax
jpeterson@wilseyham.com

WILSEY HAM
Engineering, Surveying & Planning

November 18, 2015

Suzanne Avila
Planning Director
Town of Los Altos Hills
26379 Fremont Road
Los Altos Hills, CA 94022

WH Project #: 999-002

Re: Top Elegant Investments, LLC Tentative Map – Response to Comments on MND

Dear Suzanne,

We have reviewed the public comment letters that were submitted regarding the Mitigated Negative Declaration for the Top Elegant Investments, LLC (Land of Ko) Tentative Map. From this review, we noted that some of the comments are related to the design of the Tentative Map, while other comments address aspects of the Mitigated Negative Declaration (MND). We understand that the environmental consultant that prepared the MND will be responding to the comments, however the applicant would like to provide some additional background on the Tentative Map design as it relates to the specific comments listed below.

Letter from Masayuki Murakami, dated October 23, 2015

Comment #4 – The proposed Mitigated Negative Declaration (Ko project) removes one oak tree that lies within our property.

Response: A boundary survey has been performed for all of the subdivision boundaries, including the Charles Avenue right of way. No trees will be removed that are on a neighbor's property. This tree will be checked to verify its location relative to the property line.

Letter from Environmental Design Committee, dated October 23, 2015

Comment #1 – On occasion we asked for an Open Space Easement to be established over a group of heritage oaks on Lot 1, oaks which form a significant grove. Has this been done?

Response: The applicant acknowledges and understands the Committee's request, but is not proposing an Open Space Easement over this grove of trees. This approach is proposed with the understanding that the oaks are already protected with the Town's tree protection ordinance, and a desire to limit the number of easements on the property in advance of a thoroughly coordinated site development plan for a residence.

Comment #2 – Is the path of the road through the site the same as that taken on the plan used for the 2014 study?

Response: The road alignment through the subdivision is the same as the 2014 study. We are continuing to review Charles Avenue within the dedicated road right of way connection to Natoma for possible ways to reduce impacts to trees.

Comment #3 – we asked that there be a wildlife corridor left along the eastern fence line, allowing the movement of animals from one open space to another. Why has this suggestion not been accepted, since a wildlife permeable fence is shown all around the Stirling (Ko) property, including the eastern property line?

Response: The applicant hired a wildlife biologist to review the wildlife movement potential through the subdivision and to provide recommendations to facilitate the ability of wildlife to move through the subdivision after its development. These recommendations were summarized in a letter dated November 11, 2014. The Town's ordinances require a 30-foot building setback from side and back property lines, prohibiting structures to be built within that area. This open area combined with wildlife permeable fencing will enable wildlife to move freely through these properties. The applicant is concerned that further restrictions on this area will prohibit future residents of these lots from using this area for a garden or other uses currently enjoyed by the Town's residents. As a result, the applicant believes that the current proposal achieves the Committee's objectives without the addition of further restrictions and easements on the property that would not improve the flow of wildlife.

Comment #4 – View easements were requested for the residents of Simon Lane: has this request been addressed?

Response: The Town's ordinances require a 30-foot building setback from side property lines, prohibiting structures to be built within that area. The combined setback for two adjacent lots creates a *minimum* of a 60-foot opening between structures which provides a substantial view corridor for the residences on Simon Lane. This view corridor is consistent with the minimum corridor enjoyed by other residents of the Town. As a result, the applicant believes that the current proposal achieves the Committee's objectives without the addition of further restrictions and easements on the property.

Comment #5 – Cannot an alternative be found to the position of the Lot 7 driveway?

Response: The proposed driveway for lot 7 is located on the frontage of the lot with the flattest slopes for the driveway connection to the street, and also maintains the screen of trees along the property frontage. Other locations would result in a considerable increase in grading and tree removal.

<u>Letter from Michael and Sharon Schoendorf, dated October 22, 2015</u>

Comment (summarized): The Schoendorfs express concern that the MND does not address the visual effects of the "fence gridding effect of back-to-back fencing". The Schoendorfs also state that the existing fence has affected the connectivity of wildlife between the Stirling (Ko) subdivision and their property at 13145 Byrd Lane on the Eastern border. The have seen a significant reduction in wildlife moving across their property. As a result, they recommend a 25-foot fence setback to mitigate the problem.

Response: Based on the comments received to date regarding concerns about wildlife movement through the Eastern subdivision boundary, the applicant hired a wildlife biologist to review the wildlife movement potential through the subdivision and to provide recommendations to facilitate the ability of wildlife to move through the subdivision after its development. These recommendations were summarized in a letter dated November 11, 2014. A wildlife permeable fence is now proposed along the Eastern subdivision boundary to facilitate the wildlife movement through the Eastern subdivision boundary. Therefore, the applicant does not believe a 25-foot fence setback would provide any further improvement to wildlife mobility.

Since there are already some existing fences along the Eastern subdivision boundary that belong to neighbors, these existing fences would not be removed as part of the subdivision improvements. Therefore, a 25-foot fence setback in the subdivision may result in another parallel fence to the existing boundary fence which would increase the "grid effect" of these fences.

Letter from Alan and Carol Kaganov, co-signed by Christine Sloss and Ellice Papp dated October 19, 2015

Summarized Comment #1 – Concern was expressed over the widening of Charles Avenue from its current width of approximately 17 feet to 22 feet of driving lane that results in the removal of mature Heritage Oak trees. The letter requests the re-design of the entrance road to minimize the removal of trees. Concerns were also expressed about the inclusion of a pedestrian pathway along Charles Avenue which will increase noise and reduce privacy negatively affecting the enjoyment of their home. Lastly, concerns were expressed about the increase in traffic, noise and dust during construction and continuing after the subdivision is completed.

Response: The applicant is currently looking at potential ways to reduce the impact of the entrance road on the trees lining the roadway within the panhandle. A localized, minor reduction in road widths is one of the strategies being evaluated, however any reduction in road width will need to be approved by the Town.

The installation of a pathway connection within the Charles Avenue access right of way is a recommendation of the Pathway Committee.

The Town will require dust control, limits on construction hours and several other requirements on the construction to reduce the impacts on surrounding neighbors.

Letter from Benjamin and Christine Sloss, co-signed by Alan and Carol Kaganov and Carol Kaplan, Masayuki Murakami and one other dated October 18, 2015

Summary of Comments – The letter expressed concern that the proposed widening of Charles Avenue from approximately 17 feet to 22 feet of driving lane will result in the removal of mature Heritage Oak trees. The letter requests the re-design of the entrance road to minimize the removal of trees and requests that the applicant's engineer work with an architect retained by the Sloss's in the redesign of the road.

Response: The applicant is currently looking at potential ways to reduce the impact of the entrance road on the trees lining the roadway within the panhandle. A localized reduction in road widths is one of the strategies under evaluation, however any reduction in road widths will need to be approved by the Town. Proposed changes to the road design will be made public at our earliest opportunity.

Letter from the Pathway Committee, dated October 20, 2015

Summary of Comments – The Pathway Committee expressed concern that the proposed subdivision maps (Tentative Map) does not reflect previous Pathway Committee recommendations and as a result, the subdivision will have significant negative impacts to immediate neighbors and the community at large. The Committee commented that the proposed pathway easements are not wide enough to create the necessary meandering, open character required to make the development consistent with the Town's look and feel. In addition, pathways should avoid cutting down mature trees.

Response: The pathways proposed on the Tentative Map will complete all of the pathway connections called for on the Pathways Master Plan between Natoma Road, the Stegner Pathway at the northwest corner of the subdivision, and the existing pathway easement located in the northeasterly corner of the subdivision. The total length of pathways to be constructed as part of the subdivision are approximately 4000 linear feet, and include a substantial bridge installation over a fork of Matadero Creek as well as a challenging pathway along the northerly subdivision boundary with many switchbacks. The proposed pathway easement over the lower switchback area is 75 feet wide.

The applicant believes that the proposed pathway configuration does reflect previous Pathway Committee input, although it may not reflect the Committee's current thinking.

After review of an earlier Preliminary Map version in September of 2012, the Pathway Committee requested a 30 foot easement along the easterly subdivision boundary. An alternative pathway proposal was presented to the Pathway Committee by the applicant at their meeting in January 2014 that included a pathway and easement along the full length of the northern boundary, a roadside pathway along Charles Lane from the cul de sac to Natoma Road, and a pathway connection between the cul de sac and the northern boundary within an off-road easement. A pathway was not proposed along the easterly subdivision boundary. The rationale for this proposal was that a pathway along the easterly subdivision boundary would be redundant to the roadside pathway, running parallel approximately 200 feet away and leading pathway users to the same point along the Charles Avenue access road. A roadside pathway would allow subdivision residents to walk to neighbor's homes without walking on the street and would allow more privacy in the back yards of Lots 1 - 4.

The Pathway Committee voted to accept the revised proposal contingent upon the widening of the off-road pathway easements to 20 feet along the northerly boundary (except for where it was proposed to be wider on the steeper portion of the lot 5) and from the end of the cul de sac. In addition, the Committee requested that the roadside pathway be located toward the outside of the right of way where possible. Those changes were incorporated into the Tentative Map proposal.

We understand that the Committee has re-visited their decision and have revised their recommendations to request a 30-foot pathway easement along the easterly subdivision boundary. A 30-foot pathway easement is also requested along the northerly subdivision boundary.

The applicant prefers to construct a pathway within the Charles Avenue street right of way that was previously approved by the Pathway Committee, as opposed to the 30-foot easement along the easterly subdivision boundary. There are several reasons for this preference. A roadside pathway provides the regional pathway connection requested by the Pathway Committee and better serves the residents of the subdivision by providing a place to walk between the subdivision homes without walking long distances on the road. A roadside pathway provides equal access for all residents of the subdivision.

A roadside pathway provides a connection from the proposed pathway along the northerly subdivision boundary (and the lands of Yong) to Natoma Road, which is an important connection. We are also aware that the existing pathway easement on the lands of Papp (perpendicular to the easterly subdivision boundary) has been removed from the Pathway Master Plan as a future connection, so there is no need for a pathway to connect to this easement at the easterly boundary.

To facilitate wildlife movement along the east side of the subdivision, the applicants have proposed to remove the existing mesh fencing along the easterly and northerly subdivision boundaries and replace it with wildlife permeable fencing. However, this wildlife permeable fencing will also be permeable to humans. We believe this type of permeable fence which facilitates wildlife movement will raise security concerns among the subdivision residents and neighbors if a pathway is constructed along the easterly boundary. For all of the reasons stated above, applicant continues to propose a pathway connection within the Charles Avenue right of way in lieu of a pathway along the easterly subdivision boundary. We believe this proposal achieves all of the goals of the Pathway Master Plan for a local pathway and a regional connection.

Email from Jeff Peterson on behalf of the applicant, dated October 23, 2015

Comment: In this email I recommend that Mitigation Measure BIO-4b be changed to require that a qualified biologist be hired to assess and monitor the California Red Legged Frog, eliminating the need for CDFW approval which could potentially delay the process for months.

Additional Comment: We have since become aware that BIO-5 and BIO-6 require CDFW approval of a plan to avoid badger dens, as well as mitigations for the avoidance of roosting bats. Our understanding is that CDFW does not have the statutory mechanisms for evaluating these plans and mitigations. Similar to our comment above, we believe the intent of these mitigations can be fulfilled by a qualified biologist to provide the appropriate guidance and recommendations for each species.

Very truly yours,

WILSEY HAM

Jeff Peterson

Jeff Peterson
Principal