

COASTAL CONSERVANCY

Staff Recommendation  
March 10, 2005

**HOOD MOUNTAIN REGIONAL PARK  
JOHNSON RANCH EXPANSION PROPERTY  
BAY AREA RIDGE TRAIL**

File No. 05-006  
Project Manager: Maxene Spellman/Carol Arnold

**RECOMMENDED ACTION:** Authorization to disburse up to \$235,100 to the Sonoma County Regional Parks for construction of approximately 5 miles of the Bay Area Ridge Trail in Sonoma County.

**LOCATION:** Northern end of Pythian Road, within the Expansion Project area of Hood Mountain Regional Park, approximately three miles southeast of the City of Santa Rosa, in eastern Sonoma County (Exhibit 1: Location and Site Maps).

**PROGRAM CATEGORY:** San Francisco Bay Area Conservancy

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**EXHIBITS**

- Exhibit 1: Project Location and Site Map
  - Exhibit 2: Site Photographs
  - Exhibit 3: Proposed Trail Alignment
  - Exhibit 4: Letters of Support
  - Exhibit 5: Negative Declaration
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**RESOLUTION AND FINDINGS:**

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31160 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed two hundred thirty-five thousand one hundred dollars (\$235,100) to the Sonoma County Regional Parks (Regional Parks) to construct trail improvements on the Johnson Ranch Expansion Property within Hood Mountain Regional Park in Sonoma County. Prior to the disbursement of any Conservancy funds for construction, Regional Parks shall submit for the review and approval of the Executive Officer of the Conservancy:

1. A work program, including project schedule and budget, and the names of any contractors and/or subcontractors to be employed on the project; and

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2. Evidence that all permits and approvals necessary to implement the project have been obtained; and
3. A signing plan for the project.

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with the purposes and objectives of the San Francisco Bay Area Conservancy Program, Chapter 4.5 of Division 21 of the Public Resources Code.
2. The proposed project is consistent with the Project Selection Criteria and Guidelines adopted by the Conservancy on January 24, 2001.
3. The Conservancy has independently reviewed and considered the Mitigated Negative Declaration and Mitigation Monitoring Program for the Hood Mountain Regional Park Expansion Project, attached to the accompanying staff recommendation as Exhibit 5, and finds that the project, as mitigated, avoids, reduces or mitigates the possible significant environmental effects and that there is no substantial evidence that the project will have a significant effect on the environment, as defined in 14 California Code of Regulations Section 15382.”

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**PROJECT SUMMARY:**

The Sonoma County Regional Parks proposes to construct a new, approximately five mile segment of the Bay Area Ridge Trail within a 307 acre property (Johnson Ranch) acquired in 2003 as an addition to the 1750 acre Hood Mountain Regional Park (Hood Mountain) in eastern Sonoma County. Hood Mountain is the largest regional park in Sonoma County, and is operated as a relatively undeveloped wilderness park with hiking, biking and equestrian trails. Over the last three years, Regional Parks has worked collaboratively with the Bay Area Ridge Trail Council (BARTC) to develop this project.

The new trail (Johnson Ranch Trail) would begin at the floor of Sonoma Valley, continue to several freshwater ponds and an historic cabin complex and through a scenic grassland known as Orchard Meadow, then up a wooded canyon and forested hillsides to emerge at the watershed divide of the ridgeline where spectacular views across Santa Rosa and western Sonoma County await the visitor (Exhibit 2: Site Photographs and Exhibit 3: Trail Alignment). The trail would then connect with existing trails within Hood Mountain and wind to the top of 2370 foot Mt. Hood, the highest mountain between Sonoma and Napa Valleys.

The Johnson Ranch Trail will be an officially designated segment of the 500 mile Bay Area Ridge Trail. In the future, Regional Parks plans to connect this trail with Ridge Trail segments within Sugarloaf Ridge State Park to the north and east, and State Highway 12, a major transportation corridor in Sonoma County, and Annadel State Park to the south. Before these connections can be completed, Regional Parks will attempt to acquire fee ownership or easements from willing landowners of properties along the proposed trail alignment.

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The Johnson Ranch Trail would be accessible to vehicles at its southern end from the northern end of Pythian Road, a public road which connects with State Highway 12 to the south. The project would include construction of road improvements, a parking lot for 30 to 35 cars and four to six horse trailers, restrooms, benches, directional and interpretive signs, a bridge, the trail, fencing and minimal landscaping at the staging area. These features have been designed to minimize potential impacts to natural and cultural resources.

Regional Parks manages over 5500 acres of land in Sonoma County within 40 different parks, including over 90 miles of trail. Hood Mountain has presented similar management issues to those that will arise in connection with this project. The staff has long experience in property negotiations, resource management, and trail development which will be applied to this project.

There are few long segments of the Ridge Trail in Sonoma County. Regional Parks' acquisition of the Johnson Ranch, construction of this trail, and planned future negotiations with landowners to develop connecting Ridge Trail segments present a rare opportunity to help fill this gap.

**Site Description:** The Johnson Ranch property is comprised of 307 acres of undeveloped land adjacent to and a recent addition to, the 1750-acre Hood Mountain Regional Park, Sonoma County's largest regional park. Consisting of moderate to steep mountainous terrain, Hood Mountain is primarily an undeveloped wilderness park with hiking, biking and equestrian trails. The summit of Mt. Hood rises to 2370 feet within Hood Mountain and is the highest mountain between Sonoma and Napa Valleys.

The Johnson Ranch lies within the Mayacama Range of the coastal mountains of eastern Sonoma County. The elevation at the southern boundary is approximately 850 feet, and approximately 2100 feet at the northeast corner. The overall slope is relatively gentle, dipping generally toward the southwest, and includes areas that are fairly steep, interspersed with areas that are relatively flat. The property features several prominent rock outcrops and cliff faces. Biological resources on the property are similar to those found within Hood Mountain, including coniferous and riparian forest, oak woodlands, chaparral, freshwater springs, ponds and grasslands typical of the coastal ranges of California.

Like other properties in the region, in recent times the Johnson Ranch has been used as a private residence, and for timber harvesting, grazing, and private recreation. Adjacent land uses consist of rural development on the north, west, and southeast sides of the site, and Hood Mountain to the northeast. To the south of the property are several County-owned parcels containing a County building complex housing the Bridges Program and a wildlife rescue facility.

The lower portion of the Johnson Ranch is accessed from Pythian Road in Sonoma Valley, designated as a public road from State Highway 12 to the County building complex described above. At the end of Pythian Road a road continues north onto the Johnson Ranch property where an existing gravel road will be modified to serve as the park driveway. Also in the lower property is the proposed staging area, currently served by water, telephone and electrical power. Beyond the staging area, the largest portion of the property rises to fairly steep topography with a perennial creek, several seasonal creeks and two ponds. The eastern boundary of the property connects with Hood Mountain where the Johnson Ranch Trail will join Hood Mountain Trail on the ridgeline which climbs to the summit of Mt. Hood, and the Summit Trail which continues to the north toward Sugarloaf Ridge State Park.

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**Project History:** The Bay Area Ridge Trail is a proposed 500-mile trail that, when completed, will enable hikers, equestrians and mountain bicyclists to experience the exceptional views, habitats and cultural resources of the nine-county San Francisco Bay Area's coastal mountains and ridgetops. Formed as a nonprofit organization in 1987 to implement this vision, BARTC assists local entities such as Sonoma County Parks Department in identifying and creating the Ridge Trail. Since its inception, 267 miles of the proposed route have been dedicated and opened for public use. When completed, the Ridge Trail will include trail alignments along the ridges of the entire San Francisco Bay region, as well as connector trails extending from lower elevations.

Since 2001, the Conservancy has provided the majority of the financial support for the planning efforts of the BARTC to develop Ridge Trail projects. Among many other projects, BARTC has worked with the Regional Parks and other entities to identify potential Ridge Trail links in Sonoma County. In late 2002 and early 2003, the Sonoma County Board of Supervisors approved the purchase of over 307 acres of property adjacent to Hood Mountain Regional Park. The Sonoma County Agricultural Preservation and Open Space District funded this \$4 million acquisition which was completed in March, 2003. This acquisition has enabled BARTC and Regional Parks to move forward with this major segment of the Ridge Trail in Sonoma County.

The project site itself has an interesting history. Like surrounding lands, it was used by three separate indigenous groups, the Wappo, Southern Pomo and Coast Miwok who settled in semi-permanent villages and seasonal camps used for hunting and gathering. After European settlement, a large land grant (Los Guilicos) was established just to the south of the property. Various owners used the property for various purposes until, in 1957, the Johnson family purchased the property and owned it up to the time it was sold to the County. According to a family member, the property has been the site of three Indian hunting camps, an orchard cultivated by monks, an alcohol still during prohibition, a retreat for the fraternal organization known as the Knights of Pythias, mining, ranching, and a hunting lodge.

**PROJECT FINANCING:**

Coastal Conservancy	\$235,100*
Sonoma County (Proposition 12 per capita funds)	\$300,000
Sonoma County (Park Mitigation Fees)	<u>\$100,000</u>
 Total Project Cost	 \$635,100

In addition to the funding sources listed above, the project is also supported by in-kind donations by volunteers from Recreation Equipment Incorporated (REI), the Sierra Club, Sonoma County Trails Council, and other groups anticipated to total \$22,500.

- The expected source of Conservancy funds for this project is the FY 02/03 appropriation to the Conservancy from the California Clean Water, Clean Air, Safe Neighborhoods and Coastal Protection Act of 2002 (Proposition 40) for the San Francisco Bay Area Conservancy Program. Under Public Resources Code Section 5096.650(b), Proposition 40 funds may be used for the development of land resources in accordance with the

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provisions of the Conservancy's enabling legislation, Division 21 of the Public Resources Code. The proposed project serves to assist in the development of land-based public access and, as discussed in the section found immediately below, the project is consistent with Chapter 4.5 of Division 21. Proposition 40 also requires the Conservancy to give priority to grant projects with matching funds (Public Resources Code Section 5096.651). The project is supported by a commitment by Sonoma County and others to provide almost two thirds of the cost of trail development.

**CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:**

This project would be undertaken pursuant to Chapter 4.5 of the Conservancy's enabling legislation, Public Resources Code Sections 31160-31164, to address recreational goals of the San Francisco Bay Area Conservancy Program.

Pursuant to Section 31162, the Conservancy may award grants in the nine-county San Francisco Bay Area that help to achieve various specific goals, including the goal of increasing public access. This project is located entirely within Sonoma County, one of the designated nine counties of the San Francisco Bay Area. Consistent with Section 31162(a), the project would improve public access around the ridgetops by contributing towards the completion of a regional ridge trail system. As required by Section 31162(a), the project will not have a significant adverse impact on environmentally sensitive areas and wildlife.

Section 31163(a) directs the Conservancy to cooperate with nonprofit land trusts and other organizations in identifying and adopting long-term resource and outdoor recreational goals for the San Francisco Bay Area. Completion of the Ridge Trail is one of the goals identified in the Bay Area Open Space Council's "Regional Needs Briefing Book."

The proposed project satisfies the criteria for determining project priorities under Section 31163(c) in the following respects: (1) the Ridge Trail is a multijurisdictional resource; (2) the Ridge Trail serves a regional constituency; (3) the project can be implemented in a timely way; (4) the project provides an opportunity for benefits that could be lost if Regional Parks is unable to construct the trail improvements; and (5) the project includes significant matching contributions from the County.

**CONSISTENCY WITH CONSERVANCY'S  
STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):**

The proposed project is consistent with **Goal 11** of the Conservancy's Strategic Plan, which is to improve public access, recreation and educational facilities in and around the San Francisco Bay, coast, ridge tops, urban open spaces and natural areas.

Consistent with **Goal 11, Objective A**, the proposed project involves the construction of a new public trail across land that was previously not available to the public. The trail will be built upon land recently acquired by Regional Parks.

Consistent with **Goal 11 Objective B**, the proposed project will add approximately 5 miles to help complete the Ridge Trail and will provide regionally significant public access that links with urban open spaces.

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**CONSISTENCY WITH CONSERVANCY'S  
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines adopted January 24, 2001, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy's statutory programs and purposes:** See "Consistency with Conservancy's Enabling Legislation" above.
2. **Consistency with purposes of the funding sources:** See "Project Financing" above.
3. **Support of the public:** There is substantial support for this project as evidenced by Letters of Support attached as Exhibit 4, including that of Senator Wesley Chesbro, the Sierra Club, the Sonoma County Trails Council, and the Bay Area Ridge Trail Council.
4. **Location:** The project is located in Sonoma County, entirely within the jurisdiction of the San Francisco Bay Program Conservancy.
5. **Need:** The project is a necessary component of developing the Ridge Trail in Sonoma County. Regional Parks is developing plans to link this trail to other Ridge Trail segments in Sugarloaf Ridge State Park and Annadel State Park. This project will provide the needed incentive to continue this effort.
6. **Greater-than-local interest:** The Ridge Trail is a major regional attraction. When completed, it will offer spectacular views of the entire Bay Area, and will link with many other parklands and preserves. Completion of the Ridge Trail is one of the goals identified in the Bay Area Open Space Council's "Regional Needs Briefing Book." The Hood Mountain Regional Park is an impressive regional park, and the trail through the Johnson Ranch expansion property will greatly enhance the semi-wilderness experience that visitors from all over the Bay Area can enjoy.

**Additional Criteria**

7. **Urgency:** Regional Parks has acquired the expansion property and has identified matching funds for this project. The project will provide the incentive to move ahead with additional segments of the Ridge Trail. If not implemented at this time, these opportunities could be lost.
8. **Leverage:** See the "Project Financing" section above.
9. **Readiness:** Regional Parks has finalized plans and environmental review for the project, dedicated necessary staff for implementation, identified matching funds, and is ready to move forward.
10. **Realization of prior Conservancy goals:** See "Project History" above.
11. **Cooperation:** This project is a collaborative effort involving Regional Parks, BARDT, the Sonoma County Trails Council and other public access and open space organizations.

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**COMPLIANCE WITH CEQA:**

Sonoma County Regional Parks staff prepared a draft Mitigated Negative Declaration and Mitigation Monitoring Program for the proposed project (Exhibit 5: Mitigated Negative Declaration and Mitigation Monitoring Program). These documents were noticed and circulated for public review on September 27, 2004. The comment period ended on October 29, 2004, and the Sonoma County Board of Supervisors adopted the Mitigated Negative Declaration on November 30, 2004 and filed a Notice of Determination approving the project with mitigation measures. The Mitigated Negative Declaration identified possible significant effects of the project related to biological resources, archeological/historical resources, and hazards and hazardous materials. Proposed mitigation measures that will avoid, reduce or minimize these possible effects to a level of insignificance are described in detail in the attached Mitigation Monitoring Program, and are summarized below:

Biological Resources

The proposed project could result in a potentially significant impact to nesting birds and impact habitat. These impacts are reduced to a less-than-significant level by implementation of the following mitigation measures:

- Regional Parks will require that all trees that are cut down will be left onsite to provide wildlife habitat.
- Regional Parks will require that snags (i.e. plant roots or dead plant material) be retained to provide wildlife habitat with the exception of snags that present a safety hazard.
- Regional Parks will, to the greatest extent feasible, remove trees, shrubs and other vegetation between August 1 and March 15 to avoid bird-nesting season.
- If it is not feasible to avoid bird-nesting season, Regional Parks will complete bird-nesting surveys between 7 and 14 days prior to the removal of vegetation. The area to be surveyed will include all construction sites for which vegetation removal is required to a buffer of 150 feet outside the boundary of the area to be cleared.
- In the event that an active nest is discovered in the area to be cleared or within 150 feet of the construction area, clearing and construction within 150 feet of the nest will be postponed. No activity will be allowed to occur within this area until it is determined that the young have fledged, the nest is vacated, and there is no evidence of second nesting attempts. Survey results will remain valid for a period of 21 days following the date of the survey.

The proposed project could generate surplus soil for disposal off-site. Improper disposal of this material could affect off-site wetlands or other sensitive habitats. This potentially significant impact can be reduced to a less-than-significant level by implementation of the following mitigation measure:

- Regional Parks will require the contractor to comply with regulations of the U.S. Army Corps of Engineers, the California Department of Fish and Game, and the North Coast Regional Water Quality Control Board regarding construction activities that affect drainages.

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- Regional Parks will require the contractor to dispose of surplus soils at an acceptable disposal site. If any areas outside the project site are used for disposal or stockpiling of soil or other materials, the contractor will be required to demonstrate that the site has all the required permits. The contractor will be required to provide evidence to Regional Parks that the site does not affect wetlands under the jurisdiction of the Army Corps of Engineers and the North Coast Regional Water Quality Control Board, or that the site has the appropriate permits from these agencies.
- Regional Parks will require the contractor to dispose of surplus concrete rubble or pavement at an acceptable and legally permitted disposal site or taken to a permitted concrete and/or asphalt recycling facility.

Project implementation will involve the removal of trees and other vegetation. Some of the trees are protected trees pursuant to the Sonoma County Tree Protection and Replacement Ordinance No. 4014. The applicable construction and mitigation standards included in Ordinance No. 4014 have been incorporated into the mitigation measures below.

- Regional Parks will implement a replanting plan to replace the vegetation removed as part of this project development. Trees removed that are subject to Sonoma County Ordinance No. 4014 will be replaced at ratios determined by the Ordinance and will be replanted on-site to the greatest degree possible. Mitigation areas have been identified along the perimeter of the parking area and the equestrian parking area. Plants will be monitored for a three-year period after installation and a survival rate of 75 percent of the total of the plants installed would be considered successful implementation of this mitigation measure. If a 75 percent survival rate is not achieved after the three-year monitoring period, additional tree and/or shrubs would be replanted.
- Regional Parks will clearly identify trees that will require removal on the construction drawings. The contractor will be required to clearly mark in the field the trees that will be removed for trail development.
- Regional Parks will clearly identify the protected perimeter of trees to be protected on the construction drawings. The protected perimeter is defined in Sonoma County Ordinance No. 4014 as the tree dripline.
- Regional Parks will require the contractor to place temporary protective fencing at the outermost edge of the protected perimeter of each tree or group of trees to be protected. Protective fencing will be placed prior to commencement of construction and will remain in place until all construction-related activities are complete. The contractor will be required to avoid disturbance within the protected perimeter during construction of the proposed project. Construction-related activities including storing equipment, chemicals, spoil materials, trash, parking vehicles or equipment, may not take place within the protective fencing.
- Regional Parks will require the contractor to perform all tree trimming and branch removal in accordance with the International Society of Arborists Tree Pruning Guidelines, adopted in 1995. These standards require that (a) branches are cut cleanly, utilizing pruning shears, loppers, or a fine tooth saw that cuts on the pull stroke; (b) branches are cut just outside the branch bark ridge or at the callus shoulder, and at a point of junction with another branch to avoid leaving a limb section without live leaf support;

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(c) climbing spurs cannot be worn when performing work on any tree, and (d) trees will not be “headed.”

- Regional Parks may require a certified arborist to be on-site to direct pruning cuts on large limbs and to ensure that necessary pruning cuts are made to balance the weight of the tree.
- Regional Parks will required the contractor to report any damage to protected trees that occurs during, or as a result of, project construction. If a protected tree is damaged so that it cannot be preserved in a healthy state, the tree will be replaced in accordance with the Arboreal Value Chart included in Sonoma County Ordinance No. 4014.

Archeological/Historical Resources

Regional Parks’ Cultural Resource Survey concluded that the prehistoric site and one of the four historic-period archaeological sites could be directly impacted by the project. One of the proposed trails could cross through these two archaeological sites. The trail was re-designed to avoid impact to these archaeological sites and the potential impact is now less than significant.

The Cultural Resources Survey identified a potential direct impact to the “Cabin Complex,” which is an historic-period archaeological resource. The Cabin Complex includes collapsed buildings, buildings that are in poor physical condition, open pits and ditches, and rock walls in varying states of disrepair. The Cabin Complex also includes artifacts such as tin cans, broken bottles and ceramics, and structural debris. In order to make the Cabin Complex safe for park visitors, some of these features and artifacts will need to be removed or stabilized which would alter the site. The Cultural Resources Survey also identified a potential indirect impact to the Cabin Complex. Opening the cabin complex area to park visitors could result in vandalism to the site and/or unauthorized collection of artifacts. These potentially significant impacts can be reduced to a less than significant level with implementation of the following mitigation measures:

- Regional Parks will complete archival research regarding the Cabin Complex, a historic-period archaeological resource. The archival research would establish the origins and features of the complex, determine what individuals and groups were associated with the complex over time, and determine how the complex was used. The archival research would help to evaluate the site’s significance and would provide useful information for an interpretive display.
- Regional Parks will complete an enhanced surface survey to thoroughly document all of the features of the Cabin Complex in order to provide information about which features need to be protected from those that do not warrant protection. Regional Parks would then be able to restore the Cabin Complex site by removing the modern site use and attempted restoration efforts from the original design elements of the site, if such restoration were to occur.
- Regional Parks will map and photograph in-place artifacts that could be collected by park visitors in the Cabin Complex. Regional Parks will consider collecting these items for curation and/or inclusion in interpretive displays.

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- Regional Parks will coordinate with an archaeologist who is familiar with the site during the design phase for trails and interpretive displays. This will minimize potential disturbance to archaeological features and exposure to vandalism.
- Regional Parks will monitor the condition of the archaeological resources, including the Cabin Complex, after these areas are open to the public. If damage and/or vandalism should occur, access to the resources may be curtailed.

Historic resources could be uncovered during construction. This less than significant impact can be further reduced with implementation of the following mitigation measure:

- If historical, archaeological, paleontological, or other types of cultural resources are discovered during project construction, construction will cease in the immediate vicinity of the find until a qualified archaeologist is consulted to determine the significance of the find and has recommended appropriate measures to protect the resource.

### Hazards and Hazardous Materials

Construction activities will require use of vehicles, construction equipment, and construction materials that use hazardous materials such as motor oil and gasoline, which have the potential for accidental release of hazardous materials into the environment. This potentially significant impact can be reduced to a less than significant level with implementation of the following mitigation measures:

- Regional Parks will required the contractor to prepare, submit, and implement a spill prevention plan for any construction of the proposed project. The contractor will be required to follow the provisions of Sections 5163 – 5167 of the General Industry Safety Orders (CCR Title 8) to protect the project site from being contaminated by the accidental release of any hazardous materials and/or waste. The contractor will be required to store all flammable liquids to be in compliance with the Sonoma County Fire Code and section 7-1.01G of the Caltrans Standard Specification (or the functional equivalent) for the protection of surface waters. If hazardous materials are encountered during construction, the contractor will immediately halt construction activities will halt immediately and will implement actions required by the current California regulatory requirements. In the event of a spill of hazardous materials the Contractor will immediately call the emergency number 9-1-1 to report the spill, and will take appropriate actions to contain the spill to prevent further migration of the hazardous materials to stormwater drains or surface waters.
- Regional Parks will require the contractor to dispose of petroleum-based products in accordance with applicable laws and regulations. If a spill should occur, the contractor will be required to immediately call 9-1-1 and report the spill to the appropriate authority. The contractor will be prohibited from conducting vehicle and equipment repair and maintenance on-site.

Maintenance of the proposed project may require the occasional use of vehicles and equipment that use hazardous materials such as motor oil and gasoline, which have the potential for accidental release of hazardous materials into the environment.

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- Regional Parks operations and maintenance crews will be required to dispose of petroleum-based products in accordance with applicable laws and regulations. If a spill should occur, Parks staff will immediately call 9-1-1 and report the spill to the appropriate authority. Regional Parks will be prohibited from conducting vehicle and equipment repair and maintenance on-site.

Maintenance of the portable restrooms or the permanent restroom could result in a sewage spill. This potentially significant impact can be reduced to less than significant levels with implementation of the following mitigation measures:

- Regional Parks will require the contractor to conduct inspections and maintenance, according to current regulations, of portable toilet facilities used during construction. The contractor will be required to conduct routine waste removal to ensure that effluent spills are avoided or minimized.
- Regional Parks will require the contractor to conduct inspections and maintenance, according to current regulations, of portable toilet facilities used during project operation. Regional Parks will ensure that routine waste removal is conducted so that effluent spills are avoided or minimized.

Given the detailed analysis of potential environmental impacts and the extensive and complete set of mitigation measures appropriately designed to reduce or eliminate these impacts, Conservancy staff recommends approval of the Mitigated Negative Declaration and Mitigation Monitoring Program for the project. Staff also recommends that the Conservancy find that the project, as mitigated, avoids, reduces, or mitigates the possible effect to a level of insignificance; that there is no substantial evidence that the project, as revised, may have a significant effect on the environment; and that the proposed Negative Declaration reflects the Conservancy's independent judgment and analysis. Upon approval, staff will file a Notice of Determination for the project.