

COASTAL CONSERVANCY

Staff Recommendation
February 15, 2024

WAVECREST COASTAL ACCESS PROJECT PHASE 2 PRIORITY ACTION IMPLEMENTATION

Project No. 23-095-01
Project Manager: Erin Gravley

RECOMMENDED ACTION: Authorization to disburse up to \$3,377,389 to the Coastside Land Trust to construct priority components of Phase 2 of the Wavecrest Coastal Access Project, which are: at least 1 mile of Coastal Trail, a trailhead with a parking lot and restroom, and a beach stairway at the Wavecrest property in Half Moon Bay, San Mateo County and adoption of findings under the California Environmental Quality Act.

LOCATION: Half Moon Bay, San Mateo County (Exhibit 1)

EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [Project Design](#)
- Exhibit 3: [Project Photos](#)
- Exhibit 4: [Project Letters](#)
- Exhibit 5: [Wavecrest Coastal Trail Phase 2 Initial Study and Mitigated Negative Declaration \(https://www.half-moon-bay.ca.us/DocumentCenter/View/3940/WavecrestCoastalTrailPart2_ISMND?bidId= \)](https://www.half-moon-bay.ca.us/DocumentCenter/View/3940/WavecrestCoastalTrailPart2_ISMND?bidId=)

RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed three million three hundred seventy-seven thousand, three hundred eighty-nine dollars (\$3,377,389) to the Coastside Land Trust (“the grantee”) to construct priority components of Phase 2 of the Wavecrest Coastal Access Project, which are: at least 1 mile of Coastal Trail, a trailhead with a

parking lot and restroom, and a beach stairway at the Wavecrest property in Half Moon Bay, San Mateo County.

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.
6. Prior to commencing the project, the grantee shall enter into and record an agreement pursuant to Public Resources Code 31116(d) sufficient to protect the public interest in the improvements.

In addition, to the extent appropriate, the grantee shall incorporate the guidelines of the Conservancy's "Coastal Access Project Standards".

Findings:

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

1. The proposed authorization is consistent with Chapter 9 of Division 21 of the Public Resources Code, regarding a System of Public Accessways.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Coastside Land Trust is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the Wavecrest Coastal Trail Phase 2 Initial Study and Mitigated Negative Declaration adopted by the City of Half Moon Bay on October 10, 2023 pursuant to the California Environmental Quality Act ("CEQA") and linked to the accompanying staff recommendation as Exhibit 5. The Conservancy finds that the Wavecrest Coastal Trail Phase 2 project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project will have a significant effect on the environment.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$3,377,389 grant to the Coastside Land Trust (CLT) to construct priority components of Phase 2 of the Wavecrest Coastal Access Project, which are: at least 1 mile of Coastal Trail, a trailhead with a parking lot and restroom, and a beach stairway at the Wavecrest property (Exhibit 1) in Half Moon Bay, San Mateo County. The remainder of the Wavecrest Coastal Trail Phase 2 project would be implemented as funding is secured.

The Wavecrest bluffs where the property resides is a significant gap in the California Coastal Trail (CCT). Though the Half Moon Bay Coastal Trail segments connect directly to the north and the south of the property, visitors wishing to travel the segment between must either detour to the shoulder of Highway 1 or cross through the Wavecrest property. As a result, Wavecrest has become an informal CCT segment stand-in as well as a bike/pedestrian connection between central Half Moon Bay and its southern neighborhoods. Walkers, runners, and bicyclists navigate rutted, potholed, and often muddy casual trails through the area to bridge these trail network gaps. The casual trails are inaccessible to people who use wheelchairs and otherwise difficult to navigate for people with mobility challenges or families with strollers. On multiple spots on the bluff, visitors scramble down to the beach via steep and eroding paths. The informal blufftop trails and beach access create drainage problems and areas of bare ground which accelerate erosion of the blufftops and encroach upon and fragment coastal grasslands, scrub, and wetlands habitats (Exhibit 3). And though the spot is popular, there is no dedicated parking lot for it, nor amenities such as bathrooms or beach access points.

The proposed project will construct public access improvements to address this need and to help protect the landscape from further degradation. The Phase 2 project in its entirety comprises constructing a segment of the CCT and spur trails to parking, beach access, and vista points; access stairways to Redondo Beach; and a parking lot and amenities such as drinking water and a restroom (Exhibit 2). Given that CLT is still fundraising for the Phase 2 project, the project proposed for the Conservancy grant consists of constructing the priority components of the Phase 2 project, which are a 1-mile segment of Coastal Trail, a trailhead with a parking lot and restroom, and a beach stairway. Depending on CLT fundraising, which is ongoing, and availability of VRA funds in the future (see Project Financing), it's possible that the project might be expanded in the future to include the remaining components of the Phase 2 project.

The trails of the Phase 2 project will close the Half Moon Bay CCT gap and address the lack of bike/pedestrian connectivity to Half Moon Bay's southern neighborhoods. They will also improve protection of coastal resources by directing foot, bicycle, and equestrian traffic to a safe, accessible route away from wetlands and other sensitive areas (with fencing alongside especially sensitive areas), reducing informal or casual footpaths, and reducing erosion caused by informal recreation. Stairways will make beach access safe and possible for many more visitors. This will also reduce the use of casual trails down to the beach, which will in turn slow bluff edge erosion. Lastly, construction of safe, environmentally protective public parking and amenities for the new CCT segment and beach access will more adequately accommodate visitors, as nearby parking lots are filled to overflowing on most weekend days.

Site Description: The project site is located in Half Moon Bay, west of Highway 1 on a terrace above scenic coastal bluffs approximately 83 feet above mean sea level. The project site is bounded by the Wavecrest Phase 1 Coastal Trail to the north, undeveloped land to the east and south, and the Pacific Ocean to the west. CLT constructed the Phase 1 Wavecrest Coastal Trail in 2014 funded in part by the Coastal Conservancy. Developed land uses in the project site vicinity include the Smith Field Little League Park located approximately 0.5 miles to the northeast, a recreational vehicle (RV) park and commercial land uses located approximately 1 mile directly to the east, Redondo Beach Road, an existing City-owned CCT segment, and a golf course are adjacent to the south, and single-family housing approximately 1 mile to the south and southeast. The Conservancy provided a grant to CLT in 2011 for the acquisition of Wavecrest and conceptual planning for the CCT on the property.

This part of Wavecrest is divided into numerous, mostly small, parcels – a legacy of how the Ocean View Railroad that owned the land in the early 1900s divided it up and auctioned off parcels. The project is solely on CLT-owned and managed property and paper street easements owned by the City of Half Moon Bay. On June 7, 2022 the City Council authorized entering into a 30-year license agreement, with options to renew, with CLT for use of these City-owned lands for the trail alignments.

The 87-acre project site consists of a gently sloping landscape, including seven gullies and one ravine. The ravine is a steep-sided large canyon that originates on the terrace and spills down the bluffs onto the beach. The project site is currently informally used for public recreation as demonstrated by a series of well-worn, informal foot trails that range from approximately 1- to 14-foot wide and have a complete lack of groundcover in comparison to the densely-vegetated areas immediately adjacent to the informal trails. The use of informal trails and resulting lack of vegetation has created significant erosion on the project site and along the bluff edge.

Existing vegetation is predominantly comprised of non-native grassland, with sections of dune scrub, coast scrub, coastal freshwater marsh, and central coast riparian scrub. On-site sensitive biological communities, which meet the California Coastal Commission's definition of an Environmentally Sensitive Habitat Area (ESHA) include sea cliffs, central coast riparian scrub, and beaches. Sea cliffs, beaches, and the Pacific Ocean form the western boundary of the project site, while non-native grassland, developed and disturbed areas, central coast riparian scrub, and seasonal wetlands form the eastern boundary. The northern and southern portions of the project site include large stands of Monterey cypress originally planted as windbreaks. The project site is locally known as one of the most important habitat sites for wintering raptors in San Mateo County, supporting high population density and diversity of raptors.

Grant Applicant Qualifications: Building the proposed access improvements at Wavecrest is part of CLT's comprehensive approach to management and stewardship of open space. CLT's mission is to protect and enhance the open space environment, including the natural, scenic, recreational, cultural, historical, and agricultural resources of Half Moon Bay and the San Mateo County coast for present and future generations. Since forming in 1997, CLT has acquired and protected more than 200 acres of open coastal bluffs and manages them for restoration and conservation and provided compatible recreational access to these open spaces. CLT regularly administers public and private grants that support this work. With the success of the Phase 1

CCT segment to the north of this project, CLT has specifically demonstrated its ability to provide for all aspects of a public access project such as this. Staff administered multiple grants, including one from the Conservancy, and successfully managed planning and design and all aspects of construction of the access improvements. Leading up to implementation of this proposed Phase 2 project, staff have carried out the same grant administration and project management tasks.

Ongoing operation and maintenance of the project recreation features will be paid from CLT's stewardship reserve fund that is replenished annually through private donations. This will pay for staff for janitorial services and, separately, for the Coastside Clean Team to do bimonthly cleanups and observation/monitoring of the Wavecrest open space. The Clean Team is a program run by Abundant Grace Coastside Worker, a local non-profit that provides paid employment for the extremely low-income earning and homeless members of the Half Moon Bay community. CLT already contracts with Abundant Grace for the Team's regular trash cleanup and monitoring of trail conditions and issues at Wavecrest and plans to expand this to include the new trails and other amenities. In addition, CLT has \$50,000 from the Coastal Commission that is allocated specifically for maintenance of the beach access stairs.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

Selection Criteria

1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.

See the "Consistency with Conservancy's Strategic Plan" section below.

2. Project is a good investment of state resources.

The proposed project will provide new coastal access amenities in Half Moon Bay, which is within close reach of millions of people in the San Francisco Bay Area. The project will provide parking and, by constructing at least 1 mile of Coastal Trail, it will help reduce use of informal trails that are contributing to erosion and habitat degradation. These improvements will help reduce coastal erosion and increase the overall resilience of these coastal bluffs to the impacts of sea level rise and climate change. The segment of Coastal Trail to be built as part of this project will extend the Half Moon Bay Coastal Trail to the north and to the south, creating a newly continuous stretch of CCT. In addition, the Conservancy commissioned a value-engineering study of the project to ensure its cost-effectiveness.

3. Project benefits will be sustainable or resilient over the project lifespan.

The alignment, siting, design, and construction materials for the Coastal Trail and other public access infrastructure are protective of the sensitive coastal bluff habitat and species found in this area, and well-suited to the non-motorized recreational uses of the trail which will ensure that the project benefits are sustainable over its 20-year lifespan. In order to ensure long-term

preservation of the trail alignment, it has been designed with a minimum 60-foot setback from the bluff edge to accommodate additional bluff erosion expected with rising sea levels and more intense storms. The trail and parking area surfacing will be compacted rock to ensure durability and a firm surface that drains well. This surfacing mimics CLT's Phase 1 CCT project to the north which, since opening in 2014, has been very popular with visitors on foot, bike, horseback and wheelchair as well as families with strollers, and it has held up well under this heavy use and through multiple, very wet winters. CLT designed and selected materials for the stairs and other project features, including signage, fencing and the restroom to withstand the coastal bluff conditions (e.g., erosive soils, salty air).

The project also actively increases the resilience of the Wavecrest bluffs to climate change by formalizing public access through the undeveloped Wavecrest bluffs. The trail directs foot, bicycle, and equestrian traffic to a safe, accessible route away from wetlands and other sensitive areas, and reduces informal or casual footpaths which are a major cause of accelerated erosion of the bluffs. Also, the beach stairs will reduce informal access down the bluff and resulting erosion, thus improving bluff resilience to climate change related impacts. Lastly, regrading and revegetating bare ground at the informal parking area at the end of Redondo Beach Road as well as along the informal trails that are on CLT and City-owned property will reduce the concentrated stormflows that are contributing to accelerated bluff erosion.

4. Project delivers multiple benefits and significant positive impact.

The proposed project will improve access to the beach and along the coastal bluff while also reducing bluff erosion and restoring habitat. Improved parking, the addition of a bathroom, and an ADA-accessible trail will ensure that the project serves a wide range of users. In addition, as described in grantee qualifications, the maintenance plan includes employment opportunities for unhoused residents of Half Moon Bay.

5. Project planned with meaningful community engagement and broad community support.

Coastside Land Trust has engaged the community at in-person and virtual events, and feedback was incorporated into key elements of the Phase 2 project design such as the alignment of trail spurs and connections to neighborhoods; locations of viewpoints; and increased parking. Community engagement for the Phase 2 project began with Phase 1 Wavecrest Coastal Trail Project. The new CCT segment was an immediate success with local and non-local trail users alike who expressed interest for a similar connection to the CCT at Redondo Beach with safe beach access and parking. At trail-specific events held at Wavecrest on National Trails Day in June of 2018 and 2019, CLT hosted on-site presentations and tours at the north and south ends of the project area. Approximately 75 participants reviewed concept maps for trail and stair beach access; went on walking tours of potential beach access locations and other trail features; and gave input on the project. CLT engaged the community at more than 20 other community events in 2018 and 2019. At least one of these events was conducted bilingually in Spanish and English.

PROJECT FINANCING

Coastal Conservancy	\$3,377,389
Coastside Land Trust	\$350,000
Project Total	\$3,727,389

Conservancy funds for the project are anticipated to come from two sources. The first is a Fiscal Year 2022/23 appropriation from the General Fund to the Conservancy for the purpose of “urgent sea-level rise adaptation and coastal resilience needs” (Budget Act 2022, SB 154 as amended by the Budget Act of 2023, SB 101). The coastal resilience funds are available as described in Section 52 of Chapter 258 of the Statutes of 2021, which sets forth a detailed description of the purposes of the coastal resilience funds, including projects for nonmotorized trails of statewide significance. The proposed project is consistent with this funding source because it will fund construction of a segment and trail head amenities of the California Coastal Trail, which is a nonmotorized trail of statewide significance.

The second source of Conservancy funds for the proposed project is an appropriation to the Conservancy from Proposition 84 (Public Resources Code Section 75001-75090). Proposition 84 authorizes the use of these funds for the purpose of promoting access to and enjoyment of coastal resources of the state (PRC Section 75060). Consistent with PRC Section 75060, this proposed project will promote access to and enjoyment of the coast by constructing new beach access facilities and a segment of the coastal trail.

Section 75060(c) allocates funding specifically for the San Francisco Bay Area Conservancy Program (Chapter 4.5 of Division 21 of the Public Resources Code, Sections 31160-31165), and states that “not less than 20% of the funds allocated by this paragraph shall be expended on projects in watersheds draining directly to the Pacific Ocean.” The proposed project is consistent with Chapter 4.5 of Division 21, as further discussed below in “Consistency with Conservancy’s Enabling Legislation.” The project is located in an ocean-draining watershed of one of the nine counties in the San Francisco Bay Area Conservancy Program, so the project meets the requirements of Section 75060(c) of Proposition 84.

Staff anticipates seeking authorization, in the future, to disburse an additional \$1 million in funds from the Violation Remediation Account (VRA) for the remainder of the Phase 2 project components upon appropriation of additional VRA funds to the Conservancy. The Coastal Act established the VRA within the State Coastal Conservancy Fund to hold penalties paid as a result of violations of the Coastal Act (See Public Resources Code Section 30823.). The VRA currently includes the \$1 million penalty paid to address violations of the Coastal Act related to the failure to provide public access to the coast at the Ritz-Carlton Half Moon Bay, which is adjacent to the project site. The funds in the VRA cannot be used until the legislature appropriates them to the Conservancy. Coastside Land Trust has \$350,000 in already-secured funds to contribute and will continue working to secure additional funds to complete the Phase 2 project.

Unless specifically identified as “Required Match,” the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from

other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to Chapter 9 of Division 21 of the Public Resources Code (Sections 31400-31410) related to public accessways. Section 31400 states that the Conservancy shall have a principal role in the implementation of a system of public accessways to and along the state's coastline. Through the proposed project the Conservancy will help enhance coastal access and the enjoyment of coastal resources along the Big Sur Coast. Section 31400.1 authorizes the Conservancy to award grants to nonprofit organizations to develop, operate, or manage lands for public access purposes to and along the coast. Consistent with Section 31400.2, the following factors were considered in determining the amount of Conservancy funding for this project: the total amount of funding available for coastal public accessway projects, the fiscal resources of the applicant, the urgency of the project, and the Conservancy's project selection criteria, as described in the "Consistency With Conservancy's Project Selection Criteria" section above.

The proposed project is also consistent with Chapter 4.5 of Division 21 of the Public Resources Code, Sections 31160-31165, regarding the San Francisco Bay Area Conservancy Program. Consistent with Section 31162(a), the proposed project will improve access to and along the coast. Consistent with Section 31163(c), the proposed project is identified as a priority in the Half Moon Bay Local Coastal Plan, will increase coastal access for people on the peninsula and throughout the Bay Area, can be implemented in a timely manner, and includes matching funds from the Coastside Land Trust.

CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#):

Consistent with **Goal 2.3 Expand Accessibility**, the proposed project will construct approximately 0.5 miles of ADA-Accessible blufftop coastal trail and install ADA-compliant parking and restrooms.

Consistent with **Goal 2.4 Build Trails**, the proposed project will construct approximately 0.5 miles of Coastal Trail.

Consistent with **Goal 2.5 Recreation Facilities & Amenities**, the proposed project will construct new parking, restrooms, and a beach access stairway.

CEQA COMPLIANCE:

On October 10, 2023, the City of Half Moon Bay adopted the Wavecrest Coastal Trail Phase 2 Initial Study and Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring and Reporting Program (MMRP), and approved the Wavecrest Coastal Trail Phase 2 project. The proposed project will construct some components analyzed in the IS/MND and Conservancy staff anticipates seeking future authorization to complete the entirety of the Phase 2 project

analyzed in the IS/MND. Staff concurs that there is no substantial evidence that the Phase 2 project will have a significant effect on the environment.

The IS/MND identified potentially significant environmental effects in the areas of Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, Transportation, and Tribal Cultural Resources. With the Phase 2 project's incorporated mitigation measures, summarized below, these environmental effects will be less than significant.

Air Quality

The Phase 2 project could result in potentially significant emissions of PM₁₀ and PM_{2.5} from fugitive dust created by soil-disturbing activities such as grading and excavation. Mitigation Measure AIR-1 requires the contractor to implement the Bay Area Air Quality Management District's best management practices for controlling fugitive dust, which are summarized as follows:

- Water all active construction areas at least twice daily.
- Pave, apply water twice daily or more if necessary to prevent airborne dust from leaving the site, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
- Sweep daily all paved access roads, parking areas and staging areas at the construction site to prevent airborne dust from leaving the site.
- Sweep public streets daily in the vicinity of the project site.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt/sand).
- Limit vehicle traffic speeds on unpaved roads to 15 miles per hour.
- Replant vegetation in disturbed areas as quickly as possible.
- Install sandbags or other erosion control measures to prevent silt runoff from public roadways.

Biological Resources

Construction activities, including clearing of vegetation or construction during the breeding season from February through August could impact a number of special status species through direct harm or modification of their habitat. The construction activities could also impact Environmental Sensitive Habitats found on site. In addition, future trail use could also impact sensitive species and habitats. Multiple mitigation measures are identified in the IS/MND to ensure these impacts are not significant. These are summarized below.

Mitigation Measures BIO-1a-1e identify several best management practices for avoiding and minimizing impacts to biological resources including: 1a) biologist led training for construction personnel to help them avoid impacts; 1b) onsite biological monitoring; 1c) use of designated staging areas with exclusion fencing to keep special status species out of staging areas; 1d) use of trash receptacles and nightly removal of trash; and 1e) installation of signs directing trail users away from sensitive areas.

Mitigation Measure BIO-2 calls for preconstruction surveys to identify nesting bird locations. If active nests are present, temporary protective breeding season buffers will be established to avoid nest abandonment and direct mortality during construction.

Mitigation Measure BIO-3 will minimize impacts to California Red Legged Frog (CRLF) and San Francisco Garter Snake (SFGS) through best management practices such as: 3a) restrict construction to the dry season; 3b) preconstruction surveys and relocation if necessary; 3c) prohibiting work for 2 days following a significant rain event; 3d) use of wildlife-appropriate erosion control material; 3e) appropriate storage and handling of culvert, pipes and other materials to ensure no CRLF or SFGS have entered into them before use in the construction; 3f) appropriate treatment of all excavated, steepwalled holes or trenches to prevent inadvertent entrapment of CRLF or SFGS; and 3g) implementing Mitigation Measures 1a-1e.

Mitigation Measure BIO-4 will minimize impacts to monarch butterflies through the following: 4a) conducting surveys during the winter roosting season prior to trimming or removing Monterey Cypress trees; and 4b) Minimize soil disturbance and vegetation removal in order to reduce the impact to nectar plants for monarch butterflies.

Mitigation Measure BIO-5 will minimize impacts to dusky-footed woodrats through pre-construction surveys, avoidance of nests, and, if necessary, removal of nests only after young have dispersed.

Mitigation Measure BIO-6 will minimize impacts to bats by conducting pre-construction surveys during maternity roosting season if project activities have the potential to disturb roosting or foraging habitats within the project site. If special-status bat species are detected during surveys, species- and roost-specific mitigation measures that prevent significant impacts shall be developed by a qualified biologist.

Mitigation Measure BIO-7 will minimize impacts to special status plant species by conducting surveys for specific species during their blooming period. If the surveys find plants in areas that would be impacted by construction, a mitigation plan will be developed and implemented that includes avoidance measures, salvaging and transplanting of plants within disturbance areas, and collection and storage of seeds for future re-establishment efforts.

Mitigation Measure BIO-8a-8c will minimize impacts to wetland habitat through implementation of best practices including: minimizing vegetation removal; following wetland permit requirements, minimizing soil disturbance, erosion and runoff, using native vegetation for replanting, not using toxic substances, such as fertilizers and pesticides; and restricting site grading to the dry season; and prohibiting storage of solid or liquid construction materials adjacent to wetlands to avoid spills into the wetlands. Impacts to seasonal wetlands will also be minimized through installation of "swamp-matting" to prevent rutting and compaction of wetland soils, and the reseeded of wetlands following construction to ensure that impacts are temporary in nature.

Cultural Resources

No known archaeological resources exist within the Phase 2 project site. The Native American Heritage Commission (NAHC) verified it had no information about the presence of Native American

cultural resources in the immediate project area. While there are no known archaeological resources within the project site and it is not anticipated that Native American or historic burials are present in the project site, discovery of unknown resources or human resources is possible in the course of project implementation. In such an event Mitigation Measures CULT-1 and CULT-2 would reduce the impact.

Mitigation Measure CULT-1 specifies the steps to be followed if an archaeological site(s) is encountered during grading or other soil disturbing activities. Depending on the type of resource found, these include recording the site and boundaries, rerouting the trail away from the site, and/or installing protective elements such as fencing to protect the site. Mitigation Measure CULT-2 specifies the steps to be followed if human remains are encountered during grading or other soil disturbing activities. These include stopping work, calling the County coroner and contacting the Native American Most Likely Descendent to inspect the site and provide recommendations for the proper treatment of the site.

Hydrology and Water Quality

Ground disturbance during construction could result in a temporary alteration in drainage patterns. However, the goal of the trail reconstruction is to reduce the overall potential for erosion and siltation with proper construction of the informal trail system. Implementation of the best management practices recommended by San Mateo County and the City of Half Moon Bay, as listed in Mitigation Measure HYDRO-1, would minimize the potential for erosion, siltation, or changes in drainage patterns as a result of the project. These practices are summarized as follows:

- Limiting construction activities to the dry season.
- Using (but not overusing) reclaimed water for dust control.
- Stabilizing construction sites, including entrances and exits.
- Following construction, stabilizing disturbed sites with native plant materials, hydroseeding, or similar measures.
- Storing stockpiled materials under tarps when they are not actively being used.
- Balancing cut and fill materials when possible.
- Disposing of all wastes and debris properly.
- Recycling materials and wastes that can be recycled (such as aggregate base materials, wood, etc.).
- Inspecting vehicles and equipment frequently for leaks and repairing promptly, and using drip pans to catch leaks until repairs are made.
- Cleaning up spills or leaks immediately and disposing of cleanup materials properly.

Transportation

During project construction, traffic related to delivery of equipment and import of material, as well as the daily transportation of construction workers to the site is not expected to cause a significant increase in traffic volume. Implementation of Mitigation Measures TRANS-1a and TRANS-1b would ensure that impacts would be less than significant.

Mitigation Measure TRANS-1a requires the contractor to prepare a Traffic Control Plan (TCP) prior to the start of construction. The TCP will include traffic control measures to ensure traffic

safety throughout project construction. Mitigation Measure TRANS-1b includes three best practices to avoid increases traffic congestion in the project area: 1) identify locations for contractor parking on site so that parking does not affect the operation of local roads; 2) Vehicle trips to and from the project site for purposes of transporting cut and fill are prohibited during peak traffic hours; and 3) In the event of lane closures due to deliveries, an adequate number of flaggers and appropriate signage shall be utilized to ensure the safe passage of vehicles, bicyclists, and pedestrians.

Tribal Cultural Resources

The City of Half Moon Bay did not receive any consultation requests from California Native American tribes in regard to this project. In addition no known archeological resources, ethnographic sites, or Native American remains are located within the project site. However, excavation of the project site could impact buried archaeological resources, including Tribal Cultural Resources. Mitigation Measures CULT-1 and CULT-2, described above, would ensure that any potential impacts would be less than significant.

With implementation of the Phase 2 project's mitigation measures, environmental effects to air quality, biological resources, cultural resources, hydrology & water quality, and transportation will be less than significant. Staff recommends that the Conservancy find that the Phase 2 project as mitigated avoids, reduces or mitigates the potentially significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the Phase 2 project will have a significant effect on the environment.

Upon approval of the project, Conservancy staff will file a Notice of Determination.