

**Evaluation for Applicability of a Categorical Exemption Under CEQA Section 15301  
Existing Facilities and Section 15303 New Construction or Conversion of Small  
Structures**

**Finch Trail Access Project from Trillium Lane-  
San Carlos, California**

**POSTING  
ONLY**

APR 08 2024

**Introduction**

The City of San Carlos (City) is proposing to formalize neighborhood access to an existing trail system by establishing a connector trail from Trillium Lane to the existing Finch Trail within an existing city-owned trail easement. The project would involve constructing a trail segment approximately 250 feet in length from Trillium Lane downslope to the existing Finch Trail. Currently, a chain across the easement entrance at Trillium Lane blocks vehicle access and an informal foot trail exists beyond the easement entrance marking a path downslope to Finch Trail. The trail segment is not yet designed but is expected to be constructed of compacted soil three to six feet wide and be designed with steps and switchbacks to help navigate the 50-foot drop in elevation, consistent with the San Carlos Hillside Trails Plan design guidelines. The access point is proposed to facilitate neighborhood access to the City's designated trail system. No trailhead staging area is proposed at Trillium Lane as part of this project. Trail signage will be placed on Club Drive by the intersection with Trillium Lane directing pedestrians to the trail connection and indicating motorists should park on Club Drive.

Construction of the new 250-foot trail segment is considered a project under the California Environmental Quality Act (CEQA) and the City, acting as the Lead Agency under CEQA, must prepare an appropriate environmental evaluation of the potential project impacts as required by CEQA. The CEQA Guidelines include a list of classes of projects which have been determined not to have a significant effect on the environment and which are considered exempt from the provisions of CEQA. Article 19 Categorical Exemptions of the CEQA Guidelines presents this list of classes of projects determined not to have a significant effect on the environment, and thus are declared to be categorically exempt from the required preparation of environmental documents.

As the Lead Agency, the City has prepared this categorical exemption documentation for the proposed project. This investigation documents the project's ability to meet the conditions for CEQA exemptions described in Section 15301 (c) Existing Facilities and Section 15303(d) New Construction or Conversion of Small Structures.

**Project Description**

Location. The trail access point (project site) is located on the north side of Trillium Lane in the City of San Carlos within a city-owned trail easement. Access to Trillium Lane, a cul-du-sac, is via Club Drive approximately 470 feet southeast of the project site. Trillium Lane is in the northwest portion of the City and borders the City of Belmont to the north. An existing, informal foot trail in the city owned easement connects to the Finch Trail, which is located within the Hidden Canyon Park Open Space Preserve in the City of Belmont (County of San Mateo 2023).

Site Characteristics. The city owned easement is in an undeveloped parcel between two residential lots. The opening of the easement is blocked by a chain at the sidewalk on Trillium Lane and slopes downward about 50 feet in elevation to its connection with the Finch Trail. The existing informal footpath follows the easement. A retaining wall, which extends from an existing residence to the north to a drainage swale to the west, crosses the trail alignment. The project

site is surrounded by single- and multi-family residences to the west, south, and east, and undeveloped open space to the north. The area surrounding the project site is Zoned RM-20 (Multi-Family-Low Density) Designation RS-3 (Single Family-Low Density) With General Plan designations of Multiple Family, Medium Density (21-59 DUs/Ac), and Single Family, Low Density (3 DUs/Ac).

**Proposed Project.** The project would formalize neighborhood public access within an existing city-owned trail easement on Trillium Lane that would connect to the existing Finch Trail. Currently, an informal foot trail exists beyond the easement entrance marking a downslope path to Finch Trail. The project would involve removing the existing chain and developing a trail segment approximately 250 feet in length that travels downslopes to the Finch Trail. The trail segment is not yet designed but is expected to be constructed of compacted soil three to six feet wide and be designed with wide stairs and/or switchbacks to help navigate the 50-foot drop in elevation and the retaining wall, consistent with the San Carlos Hillside Trails Plan design guidelines (San Carlos 2012). No trailhead staging area is proposed at Trillium Lane as part of this project. A small sign on Trillium Lane would indicate the location of the trail link to pedestrians. No tree removal is proposed as part of the project. Minimal vegetation removal would be required to construct the trail improvements.

**Parking.** Trail signage would be placed on Club Drive by the intersection with Trillium Lane indicating motorists should park on Club Drive and directing pedestrians to the trail connection.

### **Best Management Practices**

The project would follow the design and construction specifications for trails contained in the 2012 San Carlos Hillside Trails Plan. Additionally, the City would implement standard best practices during construction of the 250-foot trail segment including the following measures:

**BMP-1: Nesting Bird Surveys.** All tree trimming and vegetation removal shall occur outside of the bird nesting season if possible (defined as the time between September 1st and January 31st). If tree trimming or vegetation removal occurs during the bird nesting season between February 1st and August 31st, a qualified biologist shall perform a pre-construction survey to identify active bird nests. The pre-construction survey shall take place no more than five days prior to the tree trimming or vegetation removal, and if more than five days pass prior to the tree trimming or vegetation removal, another pre-construction survey shall be required. The survey shall include all trees and vegetation to be trimmed or removed, and all trees and shrubs within a 50-foot radius of the trimming or removal sites. If an active, native bird nest is found during the survey, the biologist shall designate a construction-free buffer zone (typically 1,000 feet for raptors and 250 feet for other birds, but this sometimes can be reduced in urban areas) around the nest to remain in place until the young have fledged. Work shall halt in the area and the qualified biologist shall be contacted immediately if a bird nest is discovered during tree trimming or vegetation removal activities.

**BMP-2: Tree Protection.** The project shall follow the City of San Carlos Protected Tree Ordinance (Ordinance 1580 Section 18.18.070, effective June 9, 2022) and associated new Protected Trees Administrative Guidelines for protection of Significant and Heritage trees on the project site. The Ordinance requires that Protected Significant and Heritage Trees have a designated Tree Protection Zone (TPZ), which identifies the area with a radius 10x the trunk diameter to protect the tree, soil, and roots from proposed disturbance. Any variation in the size

of the TPZ radius must be approved by the City arborist. The TPZ shall be shown on all site plans and landscaping plans for the project. If any construction activity is proposed within the TPZ, a Tree Protection Plan (TPP) prepared by a certified arborist shall be submitted to the City arborist for review.

Consistent with the Protected Tree Ordinance and Protected Trees Administrative Guidelines, protective tree fencing shall be installed around protected trees. Unless otherwise specified, the protective fencing shall serve as the TPZ. Fenced enclosures shall be erected around trees to be Protected to achieve three primary goals, (1) to keep the foliage crowns and branching structure clear from contact by equipment, materials and activities; (2) to preserve roots and soil conditions in an intact and non-compacted state and; (3) to identify the TPZ in which no soil disturbance is permitted and activities are restricted, unless otherwise approved. If project activities would encroach upon the TPZ of a Protected Tree, additional protective measures may be required by the City arborist.

A "Significant tree" means any tree that is 11 inches in diameter (or more) outside of bark, measured at 54 inches above natural grade. The following trees are not classified as significant or heritage trees regardless of size: Bailey, Green or Black Acacia: *Acacia baileyana*, *A. decurrens* or *A. melanoxylon*; Tree of Heaven: *Ailanthus altissima*; Fruit trees of any kind; Monterey Pine: *Pinus radiata*; Eucalyptus genera; and Monocot trees including palms and palm relatives.

A "Heritage Tree" is defined as an indigenous tree having a certain diameter measured at 54 inches above natural grade as identified below:

- California buckeye (*Aesculus californica*), single/multi stem 9" diameter or greater
- pacific madrone (*Arbutus menziesii*), single/multi stem 9" diameter or greater
- coast live oak (*Quercus agrifolia*), single/multi stem 9" diameter or greater
- valley oak (*Quercus lobata*), single/multi stem 9" diameter or greater
- blue oak (*Quercus douglassii*), single/multi stem 9" diameter or greater
- interior live oak (*Quercus wislizenii*), single/multi stem 9" diameter or greater
- coast redwood (*Sequoia sempervirens*), single/multi stem 15" diameter or greater
- California bay laurel (*Umbellularia californica*), single/multi stem 11" diameter or greater

### Findings for a CEQA Categorical Exemption

Projects resulting in a physical change to the environment are subject to review under the California Environmental Quality Act (CEQA; Pub. Resources Code § 21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.).

For projects qualifying for categorical exemptions, CEQA allows the use of multiple exemptions, as applicable, for a project. The proposed trail segment is eligible for a categorical exemption under CEQA Guidelines Section 15301 (c) Existing Facilities (Class 1) and Section 15303 (d)

New Construction or Conversion of Small Structures (Class 3) which allow the construction or minor alteration of existing facilities and topographical features, including pedestrian trails. Project consistency with these CEQA Guidelines is described below.

### Findings for a Class 1 Exemption

CEQA Guidelines Section 15301 (c):

*"Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.*

*Examples include but are not limited to:*

*(c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety, and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes)." Cal. Code Regs. tit. 14 § 15301*

**Project Consistency:** The City proposes to establish a neighborhood public access point for an existing informal pedestrian trail that is located within an existing city-owned trail easement. The trail connection would be approximately 250 feet long, would not require tree removal, and would avoid sensitive habitat (see discussion below under Exceptions to CEQA Exemptions).

The trail segment is not yet designed but is expected to be constructed of compacted soil three to six feet wide and be designed with wide stairs and/or switchbacks to help navigate the 50-foot drop in elevation and the retaining wall, consistent with the San Carlos Hillside Trails Plan design guidelines (San Carlos 2012). The installation of stairs and switchbacks would require minimal earth disturbance. The project does not propose new street parking on Trillium Lane. Trail signage would be placed on Club Drive by the intersection with Trillium Lane indicating motorists to park on Club Drive and directing pedestrians to the trail connection. A small sign on Trillium Lane would indicate the location of the trail link to pedestrians.

The key consideration for applicability of a Class 1 CE is whether the project involves negligible or no expansion of the existing use. The project would not expand the use of the existing Finch Trail. It would formalize pedestrian use of an existing informal foot path in the existing city-owned easement. The new trail segment is intended to facilitate neighborhood access to the Finch Trail and would not be designed as a trailhead. Based on the findings, the project would meet the applicability requirements for a Class 1 CE pursuant to Section 15301 of the CEQA Guidelines.

### Findings for a Class 3 Exemption

CEQA Guidelines Section 15303 (d)

*“Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include but are not limited to:*

*“(d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.” Cal. Code Regs. tit. 14 § 15303*

**Project Consistency:** The City proposes to establish a neighborhood public access point for an existing informal pedestrian trail that is located within an existing city-owned trail easement. The trail connection would be approximately 250 feet long, would not require tree removal, and would avoid sensitive habitat (see discussion below under Exceptions to CEQA Exemptions). The new trail segment is considered a small facility under the Class 3 exemption. The design and construction of the new trail segment is described above under Project Description. The trail segment is an allowable facility within the city-owned easement.

### **Exceptions to CEQA Exemptions**

The applicability of CEs is qualified by the exceptions listed in Section 15300.2 (a) through (f) of the CEQA Guidelines. In the discussion below, each exception (in italics) is followed by an explanation of why the exception does not apply to the proposed project.

**15300.2(a) Location.** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

The project site is not located in an area with any environmental resource of hazardous or critical concern such as a flood zone, sensitive habitat for species of special concern, a geologic hazard zone, or a hazardous materials site (San Carlos General Plan. 2009, updated 2023)

**15300.2(b) Cumulative Impact.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

The project site is located in a developed residential area and is surrounded by single-family and multi-family residences to the north, south, and west. To the east of the site is public open space located in the City of Belmont. New construction or development is unlikely to occur in the vicinity of the proposed trail segment. There are no other planned development projects nearby. Therefore, the project would not result in a cumulatively considerable contribution to potential impacts. Thus, exception criterion 'b' does not apply to the project.



**15300.2(c) Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The project site is located in the San Carlos Hills and is surrounded by single- and multi-family homes, paved streets, gutters, curbs, and sidewalks. Public open space is beyond the public access point. As discussed, the project proposes to formalize a neighborhood public access point on an existing city-owned trail easement. The only improvements that are proposed are minor recontouring of the natural terrain to install stairs and switchbacks to help with navigating the 50-foot drop in elevation. The proposed improvements are expected to be constructed of compacted soil three to six feet wide. The potential to impact biological resources is described below.

### Biological Resources

#### *Existing Conditions*

Two vegetation communities/landcover types, coast live oak woodland and urban-suburban, are present on the project site. Coast live oak woodland is located along the southern portion of the study area and gradually opens up to urban-suburban landcover along the northern portion of the site. The coast live oak woodland is dominated by coast live oak (*Quercus agrifolia*), but also supports California bay (*Umbellularia californica*), and Monterey cypress (*Cupressus macrocarpa*) trees along Trillium Lane. The understory of this community is barren to sparsely vegetated due to regular vegetation management (e.g., mowing) for fire suppression. Remnant understory vegetation observed in this vegetation community include native poison oak (*Toxicodendron diversilobum*) and non-native English ivy (*Hedera helix*). The urban-suburban landcover is also sparsely vegetated due to vegetation management practices. Vegetation in this area includes a variety of native and non-native species. Native species observed in the urban-suburban area are poison oak, coyote bush (*Baccharis pilularis*), yerba buena (*Clinopodium douglasii*), and sticky monkey flower (*Diplacus puniceus*). Non-native species observed are stinkwort (*Dittrichia graveolens*), bristly ox-tongue (*Helminthotheca echioides*), hawksbeard (*Crepis sp.*), pampas grass (*Cortaderia jubata*), and Italian thistle (*Carduus pycnocephalus*). The existing retaining wall is located within this landcover type.

Arroyo Willow Thicket Vegetation Alliance, which is classified by the California Department of Fish and Wildlife (CDFW) as a sensitive vegetation community, is located directly adjacent to the project site to the east (CDFW 2007). Additionally, based on the presence of the swale, a low point where water may flow at the surface or subsurface, and the presence of arroyo willows, a strong wetland indicator species, along and within portions of the swale, the Arroyo Willow Thickets could also meet the definition of a wetland as defined by the U.S. Army Corps of Engineers (USACE). Impacts to wetlands, including trail construction and vegetation removal or pruning, would also require permit authorization from the Regional Water Quality Control Board (RWQCB).

Wildlife in the project area that may occasionally visit the site likely consists of species common in urban-wildland interface areas, such as fox squirrels (*Sciurus niger*), Virginia opossums (*Didelphis virginiana*), raccoons (*Procyon lotor*), striped skunks (*Mephitis mephitis*), and a variety of bird species. No wildlife was observed on the project site during the site visit, but common birds that were detected by site or sound in the vicinity include oak titmouse (*Baeolophus inornatus*), wrentit (*Chamaea fasciata*), California towhee (*Melospiza crissalis*), spotted towhee (*Pipilo*

*maculatus*), Anna's hummingbird (*Calypte anna*). The Hidden Canyon Park Open Space Preserve likely also has mule deer (*Odocoileus hemionus*), coyotes (*Canis latrans*), western fence lizards (*Sceloporus occidentalis*), Pacific gopher snakes (*Pituophis catenifer catenifer*), and other species common in Bay Area open spaces.

### Special-Status Biological Resources

The project is the formalization of an existing 250-foot trail in a residential neighborhood, and would not impact special-status species, sensitive habitats, or protected wetlands or waters. The reasons for this determination are described below.

The California Natural Diversity Database (CNDDDB) and California Native Plant Society (CNPS) Rare Plant Inventory show five California Rare Plant Rank (CRPR) 1B plants (plants that are rare, threatened, or endangered in California and elsewhere), and two Federally and State-listed Endangered, and CRPR List 1B plants within two miles of the project site (CNDDDB 2023, CNPS 2023). The two federal and state endangered/CRPR 1B plants are the arcuate bush mallow (*Malacothamnus arcuatus*) and San Mateo thornmint (*Acanthomintha duttonii*). The six CRPR 1B plants are the white-rayed pentachaeta (*Pentachaeta bellidiflora*), Franciscan onion (*Allium peninsulare* var. *franciscanum*), western leatherwood (*Dirca occidentalis*), San Francisco collinsia (*Collinsia multicolor*), chaparral ragwort (*Senecio aphanactis*), and woodland woollythreads (*Monolopia gracilens*). Suitable habitat (e.g., chaparral, valley/foothill grassland, northern coastal scrub, serpentine) that would support most of these species is not present on the project site, but suitable chaparral habitat is present in the open space lands to the north where the Finch Trail is located, and the western leatherwood is documented within this habitat approximately 100 feet from the site (CNPS 2023). As proposed, the project would not occur in/impact the nearby chaparral habitat where these species may occur; thus, the project is not expected to impact special-status plant species.

The CNDDDB shows occurrences of San Francisco garter snake (*Thamnophis sirtalis tetrataenia*, federal and State listed as Endangered), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei* population 4, federal and state listed as Endangered), western pond turtle (*Emys marmorata*, federally proposed as threatened), western bumble bee (*Bombus occidentalis*, state Candidate as Endangered), pallid bat (*Antrozous pallidus*, California Species of Special Concern [CSSC]), burrowing owl (*Athene cunicularia*, CSSC), Townsend's big-eared bat (*Corynorhinus townsendii*, CSSC), and San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*, CSSC) within two miles of the project site (CNDDDB 2023). Occurrences of San Francisco garter snake are nonspecific in location to preserve the snake and may not be near the project site. No suitable habitat that may support most of these species (e.g., freshwater marsh, slow-moving streams for special-status reptiles/amphibians, valley/foothill grassland with ground squirrel burrows for burrowing owls, or trees with cavities or crevices for roosting bats) are present on or adjacent to the project site. Sparsely vegetated areas of the urban-suburban area could potentially support the western bumble bee, but this species has not been observed in the Bay Area since the 1950s. San Francisco dusky-footed woodrats typically occupy oak woodland habitat, but no woodrat stick houses were observed in this habitat on the site, likely due to the absence of suitable dense vegetation and woody debris due to routine vegetation management. Suitable habitat for the San Francisco dusky-footed woodrat is present in the Arroyo willow thicket directly adjacent to the site to the east and one woodrat stick house was observed in this area. Regardless, the project will not impact this adjacent habitat. Based on the existing conditions on the project site, none of the special-status animals species known to occur in the vicinity are

expected to occur on the project site. Thus, no special-status animals will be impacted by the project.

A number of common native birds may nest within the oak woodland on site, and adjacent Arroyo Willow thickets and undeveloped areas surrounding the site. All bird species are protected under the California Fish and Game code (Section 3503, 3503.5, and 3513); and most are protected under the federal Migratory Bird Treaty Act (MBTA; 16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10). Although no tree removal is proposed, the project may result in minor ground disturbance for trail construction, which has some potential to disturb/impact active nests on or in proximity to the site. To ensure that nesting birds are not impacted by the project, the City will implement BMP 1, which will avoid take of protected nesting birds.

#### *Sensitive Natural Community and Protected Wetlands and Waters.*

There are no sensitive communities, aquatic habitats, or protected wetlands or other waters on the project site (NWI, 2023). Although the proposed trail segment is not yet designed, the project will not physically encroach on the sensitive Arroyo Willow Thicket Vegetation Alliance or potential wetland that is located directly east of the project site; thus, the project will not impact sensitive habitats or protected wetlands or waters.

#### *Wildlife Movement or Nursery Sites*

The project would not impact wildlife movement or nursery sites. There are no known wildlife movement corridors or nursery sites in the project area, though wildlife does move throughout the nearby open space as well as breed there. However, the project would not create any wildlife movement barriers.

#### *Local Policies, or Habitat Conservation Plan*

The project would not conflict with a local policy or ordinance protecting biological resources, or conflict with a habitat conservation plan. The City of San Carlos has tree protection guidelines that protect trees of certain types and sizes and require permits before such trees are removed. The project is not expected to result in the removal of any Protected Trees. However, if project activities occur within a Protected Tree's TPZ, the project will comply with BMP-2. Thus, there would be no impact to Protected Trees.

The project would not impact biological resources, and thus would not conflict with any San Carlos General Plan (City of San Carlos, 2009) policies protecting biological resources. No habitat conservation plan applies to the project area.

No known circumstances at the project site or related to project operations create a reasonable possibility of significant effects to the environment. Therefore, exception criterion 'c' would not apply to the project.

**15300.2(d) Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*



The project site is located approximately 1800 feet northeast of Highway 280, an officially designated State Scenic Highway (Caltrans 2019). The project site is in a hillside area and is not visible from Highway 280. The only improvements the project proposes are the installation of stairs and a pedestrian trail along the proposed 250-foot trail to assist with navigating the 50-foot drop in elevation. The project would not damage any scenic resources such as trees, historic buildings, and rock outcroppings within the state scenic highway. Therefore, exception criterion 'd' would not apply to the project.

**15300.2 (e) Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The project site is not listed as a hazardous waste site on a list compiled pursuant to Section 65962.5 of the Government Code, according to EnviroStor database. According to the GeoTracker database there is one site within 1000 feet of the project site that is listed as a cleanup site. However, the status of this case is closed as of 2015. Additionally, there are no areas near the project site that are listed as hazardous waste sites (California Department of Toxic Substance Control 2023). Therefore, exception criterion 'e' does not apply to the project.

**15300.2 (f) Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

There are no buildings or structures of historic significance on the project site, nor are there any historic resources located in the vicinity of the project site according to the City's General Plan. Therefore, the project will not impact any historic structures or views of resources. Exception criterion 'e' does not apply to the project.

## Conclusion

Based on this analysis, the proposed Trillium Lane-Finch Trail Connection meets the criteria for a Class 1 Categorical Exemption pursuant to CEQA Guidelines Section 15301 (c), and a Class 3 exemption pursuant to CEQA Guidelines Section 15303 (d). Furthermore, exceptions to the applicability of a CE, as specified in Section 15300.2 (a) through (f) of the CEQA Guidelines, do not apply to the project. Therefore, the proposed project is exempt from CEQA evaluation.

## References

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**Figure 1: Existing Site Photos**



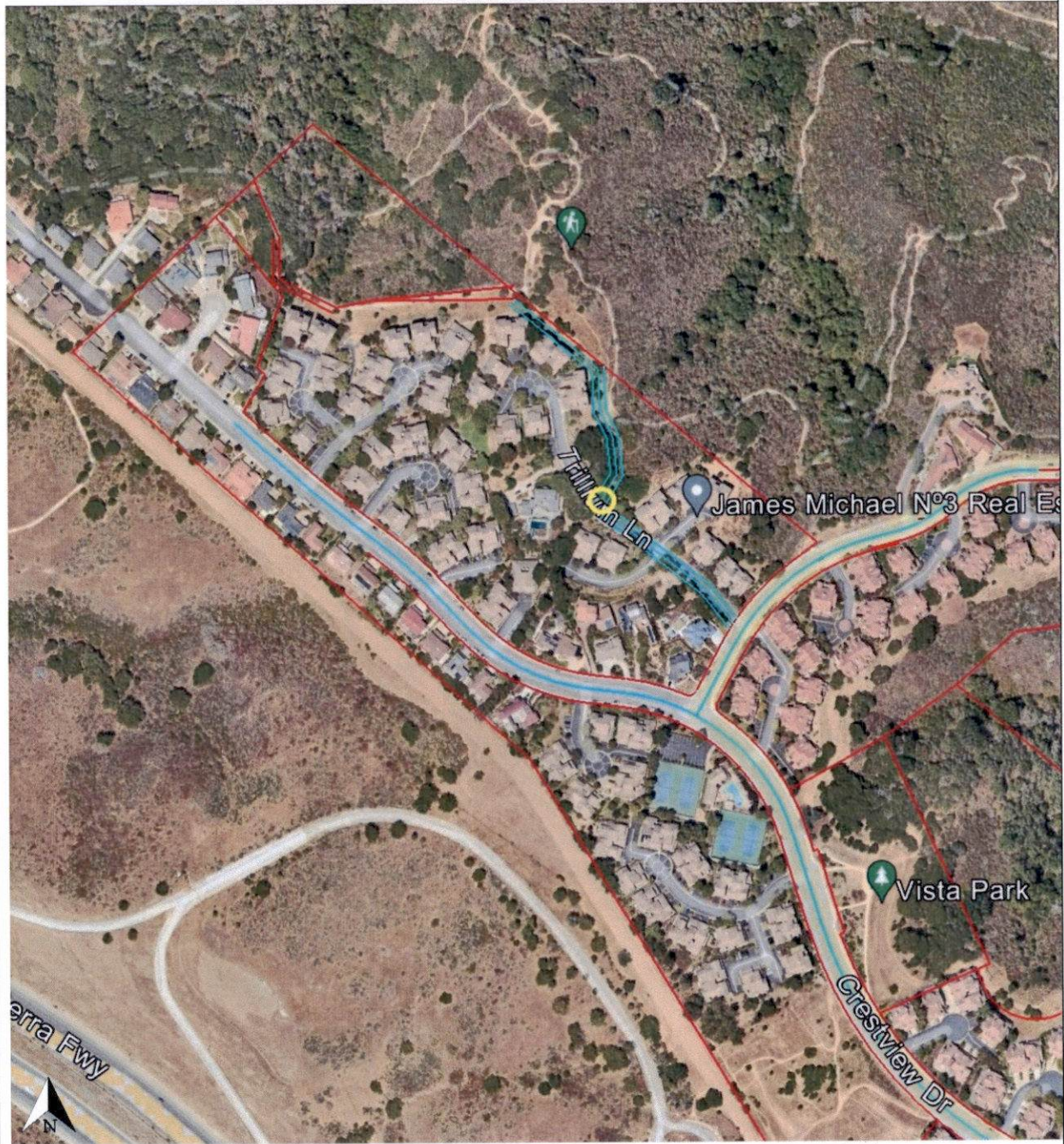
**Photo 1.** View of entrance to the trail on Trillium Lane.





**Photo 2.** View of retaining wall and area where trail steps will be installed.





**Photo 3.** Aerial view of the Trillium Lane-Finch Trail project area.