

COUNTY OF SAN MATEO, PLANNING AND BUILDING DEPARTMENT

**NOTICE OF INTENT TO ADOPT  
MITIGATED NEGATIVE DECLARATION**

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et seq.), that the following project: *Lot Line Adjustment*, when adopted and implemented, will not have a significant impact on the environment.

FILE NO.: PLN 2021-00369

OWNER: 5 El Vanada LLC

APPLICANT: Bob Johnston for Western Pacific Investments LLC

ASSESSOR'S PARCEL Nos.: 051-440-060; 051-440-070; and 051-440-390

LOCATION: El Vanada Road, Unincorporated Redwood City

**PROJECT DESCRIPTION**

The project proposes to adjust the property lines between three properties. The adjustment will result in Parcel 051-440-060 increase in size from 14,955 sq. ft. to 77,710 sq. ft., Parcel 051-440-070 increase in size from 18,627sq. ft. to 77,576 sq. ft., and 051-440-390 decrease in size from 179,992 sq. ft. to 58,288 sq. ft. The resulting parcel sizes will allow each of the three re-configured parcels to be developed with single-family residential development.

**FINDINGS AND BASIS FOR A NEGATIVE DECLARATION**

The Current Planning Section has reviewed the initial study for the project and, based upon substantial evidence in the record, finds that:

1. The project will not adversely affect water or air quality or increase noise levels substantially.
2. The project will not have adverse impacts on the flora or fauna of the area.
3. The project will not degrade the aesthetic quality of the area.
4. The project will not have adverse impacts on traffic or land use.
5. In addition, the project will not:
  - a. Create impacts which have the potential to degrade the quality of the environment.
  - b. Create impacts which achieve short-term to the disadvantage of long-term environmental goals.

- c. Create impacts for a project which are individually limited, but cumulatively considerable.
- d. Create environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The County of San Mateo has, therefore, determined that the environmental impact of the project is insignificant.

MITIGATION MEASURES included in the project to avoid potentially significant effects:

**Mitigation Measure 1:** Vegetation trimming/removal and initial earth work should be conducted outside the breeding season (September 1-January 31). If these activities occur during the breeding season, a qualified biologist will need to conduct a survey for nesting birds within five days prior to the proposed start of construction. If an active nest is detected in the construction area, work will be delayed until the young fledge, and/or a disturbance-free buffer will need to be established around the nest. California Department of Fish and Wildlife usually accepts a 50-foot buffer for passerine nests, and a 250-foot buffer for most raptor nests. A qualified biologist shall monitor the behavior of the birds at the nest site to ensure that they are not disturbed by project related activities. Nest avoidance and/or monitoring shall continue during project-related construction work until the young have fledged, are no longer being fed by the parents, and have left the nest site. At that time the nest buffer may be removed, and work may commence.

**Mitigation Measure 2:** Prior to issuance of the building permit and/or commencement to any project related activities the applicant shall provide a study of the project site completed by a qualified professional archaeologist. Any measures recommended by the archaeologist shall be implemented for the duration of the project.

**Mitigation Measure 3:** In the event that unanticipated cultural resources are exposed during ground disturbance activities, work within 15 meters (50 feet) of the find must stop and a Secretary of the Interior qualified archaeologist, must be notified immediately. Work may not resume until a qualified archaeologist can evaluate the significance of the find. If the discovery proves significant, additional work such as archaeological testing, data recovery, or tribal consultation may be warranted.

**Mitigation Measure 4:** Although not anticipated, there remains the potential for the inadvertent discovery of human remains during ground-disturbing activities. State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The San Mateo County coroner must be notified of the find immediately. If concentrations of prehistoric or historic-era materials are encountered during project activities, all work in the immediate vicinity shall cease until a qualified archaeologist can evaluate the finds and make recommendations.

RESPONSIBLE AGENCY CONSULTATION

None

## INITIAL STUDY

The San Mateo County Current Planning Section has reviewed the Environmental Evaluation of this project and has found that the probable environmental impacts are insignificant. A copy of the initial study is attached.

REVIEW PERIOD: March 20, 2024 – April 9, 2024

All comments regarding the correctness, completeness, or adequacy of this Negative Declaration must be received by the County Planning and Building Department, 455 County Center, Second Floor, Redwood City, no later than **5:00 p.m., April 9, 2024.**

## CONTACT PERSON

Angela Chavez  
Senior Planner, 650/599-7217  
[achavez@smcgov.org](mailto:achavez@smcgov.org)



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Angela Chavez, Senior Planner

County of San Mateo  
Planning and Building Department

**INITIAL STUDY  
ENVIRONMENTAL EVALUATION CHECKLIST**  
(To Be Completed by Planning Department)

1. **Project Title:** Lot Line Adjustment
2. **County File Number:** PLN2021-00369
3. **Lead Agency Name and Address:** County of San Mateo Planning & Building Department, 455 County Center, 2<sup>nd</sup> Floor, Redwood City, CA 94063
4. **Contact Person and Phone Number:** Angela Chavez 650/ 599-7217
5. **Project Location:** El Vanada Road, Unincorporated Redwood City
6. **Assessor's Parcel Number and Size of Parcel:** 051-440-060 14,955 sq. ft.; 051-440-070 18,627 sq. ft.; and 051-440-390 179,992 sq. ft.
7. **Project Sponsor's Name and Address:** Bob Johnston for Western Pacific Investments, LLC 135 Hudson Street, Redwood City, CA 94062
8. **Name of Person Undertaking the Project or Receiving the Project Approval (if different from Project Sponsor):**
9. **General Plan Designation:** Low-Density Residential (0.3-2.3 dwelling units/net acre)
10. **Zoning:** R-1/S-101/DR (One-Family Residential District, 20,000 sq. ft. Minimum Parcel Size/Design Review)
11. **Description of the Project:** The project proposes to adjust the property lines between three properties. The adjustment will result in Parcel 051-440-060 increase in size from 14,955 sq. ft. to 77,710 sq. ft., Parcel 051-440-070 increase in size from 18,627sq. ft. to 77,576 sq. ft., and 051-440-390 decrease in size from 179,992 sq. ft. to 58,288 sq. ft. The resulting parcel sizes will allow each of the three re-configured parcels to be developed with single-family residential development.
12. **Surrounding Land Uses and Setting:** The subject properties are undeveloped parcels located within an unincorporated low-density residential neighborhood. Most of the immediately adjacent properties are developed with single-family residential development. The subject properties are located in a sloped area which is accessed via El Vanada Road. El Vanada Road is a private road that serves approximately 14 properties and is accessed from Edgewood Road. The project properties are located approximately 1-mile (as the crow flies) from the intersection of Interstate 280 and Edgewood Road. The south-western property lines abut the unincorporated boundary with the City of San Carlos which is also developed with residential development.
13. **Other Public Agencies Whose Approval is Required:** None

14. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?:** No consultation has been requested. Planning staff has consulted with the following tribes, as identified by the Native American Heritage Commission (NAHC): Amah Mutsun Tribal Band of Mission San Juan, Coastanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the SF Bay Area, the Ohlone Indian Tribe, the Wukwasche Indian Tribe/Eschom Valley Band, and the Tamien Nation. On January 23 and February 14, 2024, a letter was sent to each of the contact persons provided by the NAHC regarding the subject project requesting comment within 30 days. No comments were received to date.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Significant Unless Mitigated” as indicated by the checklist on the following pages.

	Aesthetics		Energy		Public Services
	Agricultural and Forest Resources		Hazards and Hazardous Materials		Recreation
	Air Quality		Hydrology/Water Quality		Transportation
X	Biological Resources		Land Use/Planning		Tribal Cultural Resources
	Climate Change		Mineral Resources		Utilities/Service Systems
X	Cultural Resources		Noise		Wildfire
	Geology/Soils		Population/Housing	X	Mandatory Findings of Significance

**EVALUATION OF ENVIRONMENTAL IMPACTS**

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than

significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources. Sources used or individuals contacted should be cited in the discussion.

<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:					
		<i><b>Potentially Significant Impacts</b></i>	<i><b>Significant Unless Mitigated</b></i>	<i><b>Less Than Significant Impact</b></i>	<i><b>No Impact</b></i>
1.a.	Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?			X	
<b>Discussion:</b> Since the project site is undeveloped it does support areas of natural vegetation and a number of mature trees. However, the proposed lot line adjustment does not involve physical development that would result in impacts on or to a scenic area. El Vanada Road is improved and					

runs at the bottom of a valley with the parcels sloping upwards on either side. Given the slope most of the existing development is located towards the road and is minimally visible from the parcels located towards the top of the valley. The parcels are also located within a Design Review District and future development is subject to the issuance of a Design Review Permit which includes guidelines requiring the minimization of tree removal and site alterations ensuring that the future development would not have an adverse effect on any scenic views.

**Source:** Project Location; San Mateo County Zoning Regulations.

1.b. Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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**Discussion:** The project site is not located within a state scenic highway.

**Source:** Project Location.

1.c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
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**Discussion:** The project site is located within an urbanized area.

**Source:** Project Location.

1.d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				X
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**Discussion:** The proposed lot line adjustment does not involve physical development that would create a new source of light or glare that could adversely affect day or nighttime views in the area. Any future development would be subject to the areas Design Review guidelines which require non-reflective materials and downward facing lighting which would address any impacts to future light or glare.

**Source:** Project Location; San Mateo County Zoning Regulations.

1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?				X
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**Discussion:** The project site is not adjacent to a designated Scenic Highway or within a State or County Scenic Corridor.

<b>Source:</b> Project Location.					
1.f.	If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?			X	
<p><b>Discussion:</b> The project parcels are located within a designated Design Review District. The proposed lot line adjustment does not result in an increase of parcels beyond the current number but does result in conforming minimum sized parcels as required by the Zoning Regulations. The project does not propose to alter the General Plan designation or density and any future development will be subject to the development standards delineated in the County's Zoning Regulations.</p> <p><b>Source:</b> Project Location, County of San Mateo General Plan; County of San Mateo Zoning Regulations.</p>					
1.g.	Visually intrude into an area having natural scenic qualities?			X	
<p><b>Discussion:</b> Given that the project site is made up of three undeveloped parcels which are located in a low-density residential neighborhood the parcels do have natural scenic qualities. However, the project as currently proposed does not involve any physical development. Any future development on the resulting parcels will be subject to review under the County of San Mateo's Bayside Design Review Zoning Regulations and consideration by the Bayside Design Review Committee. These regulations look to limit the potential development impacts by requiring that buildings be designed with shapes that respect and conform to the natural topography of the site and by utilizing colors and materials that blend with the natural setting of the area. The regulations also seek to minimize grading and tree removal associated with development. Implementation of these standard regulations would reduce the impacts of any future development to less than significant.</p> <p><b>Source:</b> Project Location; San Mateo County Zoning Regulations.</p>					

**2. AGRICULTURAL AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:



	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
<p><b>Discussion:</b> The project site is located outside of the Coastal Zone but is not within an area mapped for Prime Farmland, unique farmland, or farmland of statewide importance. The project site is defined as “Other Land” by the California Important Farmland Finder mapping tool and is surrounded by areas defined as “Urban and Built-Up Land”.</p> <p><b>Source:</b> Project Location; CA Department of Conservation-California Important Farmland Finder Web Tool (accessed January 2024).</p>				
2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?				X
<p><b>Discussion:</b> The properties are not zoned for agricultural uses and are not covered by an existing open space easement or Williamson Act contract. The properties are zoned for residential uses and the project is consistent with that designation.</p> <p><b>Source:</b> Project Location; County of San Mateo Zoning Regulations.</p>				
2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?			X	
<p><b>Discussion:</b> The area in an around the project site is zoned and developed for residential uses. The project area is not located within an area identified as having or adjacent to farmland. California Public Resources Code defines forestland as land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Given that the overall project site is approximately 4.9 acres in size and currently undeveloped it could support 1% of native tree cover under natural conditions. However, the project site is located within an urbanized residentially zoned district which limits building site coverage to 25% of the parcel size. Post lot line adjustment the resulting parcel sizes are large and considering the limit on building site coverage would still allow for 10% of the area to remain undisturbed.</p> <p><b>Source:</b> Project Location; San Mateo County Zoning Regulations.</p>				

2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				X
<p><b>Discussion:</b> The project site is not located within the Coastal Zone.</p> <p><b>Source:</b> Project Location.</p>				
2.e. Result in damage to soil capability or loss of agricultural land?				X
<p><b>Discussion:</b> The project site does not currently support agricultural activities or agriculturally capable soils.</p> <p><b>Source:</b> Project Location; Project Scope; CA Department of Conservation-California Important Farmland Finder Web Tool (accessed January 2024).</p>				
<p>2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p> <p><i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i></p>				X
<p><b>Discussion:</b> The project results in parcel sizes consistent with the Zoning Regulations. The project does not include physical development, but subsequent development of the parcels is expected. Neither the project nor any future residential development requires rezoning of the properties or surrounding property. Any necessary improvements would be limited to the project sites.</p> <p><b>Source:</b> Project Scope; Project Location; San Mateo County Zoning Regulations.</p>				

<p><b>3. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
	<b>Potentially Significant Impacts</b>	<b>Significant Unless Mitigated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
<p><b>Discussion:</b> The proposed lot line adjustment does not include any physical development that would result in emissions that could conflict with or obstruct implementation of the applicable air quality plan. However, the lot line adjustment will result in three parcels sufficient in size to</p>				

accommodate the construction of three residential units. Given that the parcels are undeveloped and considering the sloped nature of the parcel grading of the parcels is expected. While the project may result in dust and odors associated with the grading and construction process, these impacts would be temporary and would not affect a significant number of people. The development of the individual parcel will also require that a separate Grading Permit be obtained which will include conditions of approval requiring that project implement all control measures to minimize emission from construction activities as detailed in the County's Grading Ordinance and as required by the Bay Area Air Quality Management District (BAAQMD).

**Source:** Project Location; Project Plans; San Mateo County Grading Ordinance; Bay Area Air Quality Management District.

3.b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			X	
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**Discussion:** As of December 2012, San Mateo County is a non-attainment area for PM-2.5. On January 9, 2013, the Environmental Protection Agency (EPA) issued a final rule to determine that the Bay Area attains the 24-hour PM-2.5 national standard. However, the Bay Area will continue to be designated as "non-attainment" for the national 24-hour PM-2.5 standard until the BAAQMD submits a "re-designation request" and a "maintenance plan" to EPA and the proposed redesignation is approved by the EPA. A temporary increase in the project area is anticipated at the time of future construction (not part of this phase of the project) since these PM-2.5 particles are a typical vehicle emission. The temporary nature of the future construction and California Air Resources Board vehicle regulations reduce the potential effects to a less than significant impact.

**Source:** Project Scope; Bay Area Air Quality Management District; San Mateo County Grading Ordinance.

3.c. Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?				X
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**Discussion:** The proposed lot line adjustment does not include any physical development that would result in emissions that could conflict with or result in the exposure of sensitive receptors to substantial pollutant concentrations. Future construction will involve the requirement that the applicant obtain a Grading Permit. Implementation of standard conditions associated with this permit will ensure that the temporary construction related impacts are addressed. Further, there are no sensitive receptor locations within close proximity of the project site that would be impacted.

**Source:** Project Location; Project Scope, San Mateo County Grading Ordinance.

3.d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X
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**Discussion:** The proposed lot line adjustment does not include any physical development or aspects that would result in emissions. The future construction is not expected to result in other emissions which would adversely affect a substantial number of people.

**Source:** Project Scope.

4. <b>BIOLOGICAL RESOURCES.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4.a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?				X
<p><b>Discussion:</b> The project site is largely undeveloped aside from the portions of El Vanada Road that have previously been constructed. The parcels will serve as infill development as there is existing residential development present along the roadway both before and after the project site. A review of the California Natural Diversity Database identified no special status species (animal or plant) in the project area. Given that there are no mapped resources, and the semi-developed nature surrounding the project site there is no anticipated adverse impacts either directly or through habitat modifications expected with this project.</p> <p><b>Source:</b> Project Location; California Natural Diversity Database; San Mateo County General Plan Sensitive Habitats Map.</p>				
4.b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?				X
<p><b>Discussion:</b> The project site is not mapped as supporting any riparian habitat or other sensitive natural community identified in any local or regional plans, policies, or regulations.</p> <p><b>Source:</b> Project Location; San Mateo County General Plan Sensitive Habitats Map.</p>				

4.c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
<p><b>Discussion:</b> The project site is located in an urbanized residential neighborhood. There are no mapped wetlands in the project vicinity.</p> <p><b>Source:</b> Project Location; San Mateo County General Plan Sensitive Habitats Map.</p>				
4.d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
<p><b>Discussion:</b> The project site supports a number of mature trees which will not be impacted by the lot line adjustment. However, the future development of the resulting parcels will impact some of the trees. While the parcels are located in an urbanized area the presence of migratory birds is possible. Therefore, the following mitigation measure has been added to reduce the potential of construction related impacts to less than significant.</p> <p><b>Mitigation Measure 1:</b> Vegetation trimming/removal and initial earth work should be conducted outside the breeding season (September 1-January 31). If these activities occur during the breeding season, a qualified biologist will need to conduct a survey for nesting birds within five days prior to the proposed start of construction. If an active nest is detected in the construction area, work will be delayed until the young fledge, and/or a disturbance-free buffer will need to be established around the nest. California Department of Fish and Wildlife usually accepts a 50-foot buffer for passerine nests, and a 250-foot buffer for most raptor nests. A qualified biologist shall monitor the behavior of the birds at the nest site to ensure that they are not disturbed by project related activities. Nest avoidance and/or monitoring shall continue during project-related construction work until the young have fledged, are no longer being fed by the parents, and have left the nest site. At that time the nest buffer may be removed, and work may commence.</p> <p><b>Source:</b> Project Location; Standard Biological Mitigation Measure.</p>				
4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?			X	
<p><b>Discussion:</b> The proposed lot line adjustment does not involve the removal of trees. Subsequent development of the resulting parcels may occur and will be subject to the San Mateo County Removal of Significant Tree Ordinance, Removal of Heritage Tree Ordinance, and Bayside Design Review District standards for the Palomar Park area which all require that development projects minimize the removal of trees and provide protection measures for trees in the vicinity of proposed development.</p>				

<b>Source:</b> Project Plans; San Mateo County Significant Tree Ordinance; San Mateo County Heritage Tree Ordinance, and San Mateo County Zoning Regulations.					
4.f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				X
<p><b>Discussion:</b> There is no adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan that covers the project area.</p> <p><b>Source:</b> Project Location.</p>					
4.g.	Be located inside or within 200 feet of a marine or wildlife reserve?				X
<p><b>Discussion:</b> As discussed previously, the subject parcel is located with a developed low-density residential district. There is no marine or wildlife reserve located within 200 feet of the project site.</p> <p><b>Source:</b> Project Location.</p>					
4.h.	Result in loss of Oak woodlands or other non-timber woodlands?			X	
<p><b>Discussion:</b> The project site is located in an area with canyon like features where the access road runs along the low-lying center and where the topography slopes upward on either side of the road. While the proposed lot line adjustment will not have any impacts on trees, the subsequent development of the parcels will result in the loss of trees. However, it is expected that most of the development will occur adjacent to the roadway due to the aforementioned slopes. This will allow much of the project area to remain in its natural state especially in the upper sloped areas. The project also will be required to comply with the San Mateo County Bayside Design Review Zoning Regulations, Grading Ordinance, and Significant Tree Ordinance all of which encourage the protection of natural vegetation and minimization of tree removal when associated with development.</p> <p><b>Source:</b> Project Location; San Mateo County Zoning Regulations; San Mateo County Grading Ordinance; San Mateo County Significant Tree Ordinance.</p>					

<b>5. CULTURAL RESOURCES.</b> Would the project:					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		X		
<p><b>Discussion:</b> A project referral was sent to California Historical Resources Information System (CHRIS), File No: NWIC 23-1008. The CHRIS response noted that no previous cultural resources</p>					

study had been conducted which covered the project area and that the project area has the possibility of containing unrecorded archaeological sites. California Historical Resources Information System recommended that a study by a qualified professional archaeologist is recommended prior to commencement of project activities. Therefore, the Mitigation Measure 2 has been added to address this recommendation. California Historical Resources Information System also recommended that the local Native American tribe(s) be contacted regarding traditional, cultural, and religious heritage values that might be present on the site. Staff contacted the Native American Heritage Commission (NAHC) to complete a sacred lands request and obtain a list of the local Native American tribe(s). The NAHC provided a response noting that the results were positive and to contact the Amah Mutsun Tribal Band of Mission San Juan Bautista. The NAHC also provided a list of other Native American tribes that may have knowledge of the site. The Amah Mutsun Tribal Band of Mission San Juan Bautista and all other tribes noted on the provided list were sent notification of the proposed project and site location. No responses to those notifications were received. However, in the event cultural resources are encountered Mitigation Measure 3 has been added.

**Mitigation Measure 2:** Prior to issuance of the building permit and/or commencement to any project related activities the applicant shall provide a study of the project site completed by a qualified professional archaeologist. Any measures recommended by the archaeologist shall be implemented for the duration of the project.

**Mitigation Measure 3:** In the event that unanticipated cultural resources are exposed during ground disturbance activities, work within 15 meters (50 feet) of the find must stop and a Secretary of the Interior qualified archaeologist, must be notified immediately. Work may not resume until a qualified archaeologist can evaluate the significance of the find. If the discovery proves significant, additional work such as archaeological testing, data recovery, or tribal consultation may be warranted.

**Source:** Project Location; California Historical Resource Information System (File No.: 23-1008); State of California Native American Heritage Commission.

5.b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?		X		
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**Discussion:** See discussion under 5.b., above.

**Source:** Project Location; California Historical Resource Information System (File No.: 23-1008); State of California Native American Heritage Commission.

5.c. Disturb any human remains, including those interred outside of formal cemeteries?		X		
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**Discussion:** Although there have been no identified human remains found within the project area, the following mitigation measure has been recommended to ensure that potential impacts are mitigated to a less than significant level in the event that they are discovered:

**Mitigation Measure 4:** Although not anticipated, there remains the potential for the inadvertent discovery of human remains during ground-disturbing activities. State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The San Mateo County coroner must be notified of the find immediately. If concentrations of prehistoric or

historic-era materials are encountered during project activities, all work in the immediate vicinity shall cease until a qualified archaeologist can evaluate the finds and make recommendations.

**Source:** Project Location; California Historical Resource Information System (File No.: 23-1008); State of California Native American Heritage Commission.

<b>6. ENERGY.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
6.a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
<p><b>Discussion:</b> The project does not involve development which would consume or result in wasteful, inefficient, or unnecessary consumption of energy resources.</p> <p><b>Source:</b> Project Plans.</p>				
6.b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.				X
<p><b>Discussion:</b> The project does not involve elements which would conflict or obstruct a state or local plan for renewable energy or energy efficiency. Any future development will be subject to securing separate entitlements which will be required to comply with any applicable renewable energy or energy efficiency requirements.</p> <p><b>Source:</b> Project Plans.</p>				

<b>7. GEOLOGY AND SOILS.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7.a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				



<p>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?</p> <p><i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i></p>			X	
<p><b>Discussion:</b> A Geotechnical Study was prepared for the project site. The study was prepared by Lee Engineers, Inc., dated April 20, 2020 (Geotechnical Study). The study notes that nearest fault is the San Andreas fault at approximately 1.9 miles southwest of the project site. The other noted fault is the Hayward fault which is located 17 miles northeast from the project site. The study notes that the San Andreas Fault is a significant right-lateral strike slip fault with compression forces which have initiated parallel faulting and thrusting along either side of the fault zone. The study sites an empirical study by the USGS which determined that the site could be subject to “very strong” ground motion on the above-mentioned faults. The very strong ground motion equivalent to an approximate intensity of VIII on the Modified Intensity may be expected. While the lot line adjustment does not involve the construction of any physical development, future development of the parcels is expected. The study does provide discussion, conclusions, and recommendations for the future development of the parcel. Future development of this parcel will require compliance with the applicable building permit regulations including compliance with applicable geotechnical requirements.</p> <p><b>Source:</b> San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp: California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.</p>				
<p>ii. Strong seismic ground shaking?</p>			X	
<p><b>Discussion:</b> See discussion under 7.a.i, above.</p> <p><b>Source:</b> San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp: California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.</p>				
<p>iii. Seismic-related ground failure, including liquefaction and differential settling?</p>				X
<p><b>Discussion:</b> Neither the submitted Geotechnical Study nor the noted reference maps identify the project location as being susceptible to seismic-related ground failure, including liquefaction, and/or differential settling.</p> <p><b>Source:</b> San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp: California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.</p>				

iv. Landslides?			X	
<p><b>Discussion:</b> The project site is located in an area mapped for landslide susceptibility. The Geotechnical Study provides recommendations for the type and method of construction best appropriate for the geology of the site. At the time of project construction, the study also includes recommendations regarding observation and testing of work to be performed. However, given the mapped hazards as part of the standard building permit process the applicant will be required to adhere to the recommendations of the geotechnical study.</p> <p><b>Source:</b> San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp; California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.</p>				
v. Coastal cliff/bluff instability or erosion?  <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i>				X
<p><b>Discussion:</b> The project site is not located on a coastal cliff or bluff. The project site is located on the inland bayside area of San Mateo County approximately 9.5 miles from the Pacific Ocean and 6 miles from the San Francisco Bay.</p> <p><b>Source:</b> Project Location.</p>				
7.b. Result in substantial soil erosion or the loss of topsoil?			X	
<p><b>Discussion:</b> As discussed previously, the proposed lot line adjustment does not include physical development and therefore will not result in substantial soil erosion or the loss of topsoil. Future development of the site will likely involve earthwork that could result in temporary constructed related impacts. However, at the construction phase the project will be required to prepare and submit for review and approval sediment and erosion control plans and implement standard construction best management practices. As is standard requirement the measures will need to be installed prior to project commencement and be maintained for the duration of the project.</p> <p><b>Source:</b> Project Plans; San Mateo County Grading Ordinance;</p>				
7.c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?		X		
<p><b>Discussion:</b> The subject parcels are not mapped as being susceptible to lateral spreading, subsidence, severe erosion, liquefaction, or collapse. However, the project site is mapped as a known area susceptible to landslides.</p> <p><b>Source:</b> Project Location; San Mateo County General Plan Natural Hazards Map; EQ Zapp; California Earthquake Hazards Zone Application.</p>				

7.d. Be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property?				X
<p><b>Discussion:</b> The geotechnical study notes that test borings conducted as part of the study. The borings found that the first six feet consisted of dark brown Silty Clay with some sand and angular gravel stratum overlaid on the top of weathered and fractured brown greenstone with coarse sand and small gravel combined to the depth of exploration. With increasing depth of penetration, drilling became extremely difficult due to stiff consistency and gravel size increase. The lab tested borings found that the soils had a plasticity of 10 which is generally below what is considered expansive.</p> <p><b>Source:</b> San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp: California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.</p>				
7.e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
<p><b>Discussion:</b> As part of the permit application the applicant has submitted preliminary plans which have been reviewed and conditionally approved by the County's Environmental Health Services, the agency responsible for the review and approval of such systems.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
7.f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
<p><b>Discussion:</b> The subject property does not support a unique paleontological resource or site or unique geologic feature.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				

<b>8. CLIMATE CHANGE.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
8.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?			X	

<p><b>Discussion:</b> The proposed lot line adjustment does not involve physical construction that would result in the generation of GHG emissions. The future development of the project site could result in temporary construction related impacts. However, the vehicles and equipment associated with the construction phase of the project are subject to California Air Resources Board emission standards which would reduce any impacts to less than significant.</p> <p><b>Source:</b> California Air Resources Board, San Mateo County Energy Efficiency Climate Action Plan.</p>					
8.b.	Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X
<p><b>Discussion:</b> The project does not conflict with the San Mateo County Energy Efficiency Climate Action Plan. At the time that future development is proposed it will be subject to securing separate entitlements and complying with all applicable County and State requirements such as the California Green Building Standards Code, which includes requirements for energy saving measures.</p> <p><b>Source:</b> San Mateo County Energy Efficiency Climate Action Plan.</p>					
8.c.	Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				X
<p><b>Discussion:</b> The project site does not qualify as forestland. The proposed lot line adjustment does not require the removal of trees and any future development will be subject to the applicable County regulations for the minimization of removal and protection of significant trees. While removal of trees will be necessary to develop the resulting parcels, County Ordinances require tree replacement as a standard condition of approval.</p> <p><b>Source:</b> Project Location; San Mateo County Zoning Regulations; San Mateo County Significant Tree Ordinance.</p>					
8.d.	Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				X
<p><b>Discussion:</b> The project site is located approximately 2.80 miles from San Francisco Bay and 9.50 miles from the Pacific Ocean. Due to distance and topography the project site is not expected to be impacted by sea level rise.</p> <p><b>Source:</b> Project Location.</p>					
8.e.	Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
<p><b>Discussion:</b> See discussion under 8.d., above.</p> <p><b>Source:</b> Project Location.</p>					

8.f.	Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
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**Discussion:** The project site is located in Flood Zone X designated as an area of minimal flood hazard, usually depicted on FIRMS as above the 500-year flood level.

**Source:** FEMA Flood Insurance Rate Map (Community Panel No. 06081C0282E, map effective October 16, 2012).

8.g.	Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
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**Discussion:** See discussion under 8.f., above.

**Source:** FEMA Flood Insurance Rate Map (Community Panel No. 06081C02820E, map effective October 16, 2012).

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
		<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9.a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?				X
<p><b>Discussion:</b> The proposed project does not involve development at this time that would result in the transport of any materials to the project site. The future development of the parcels would involve the construction of residential development which is consistent with the type and scope of development present in the surrounding neighborhood. Construction activities would not involve elements that would result in a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.</p> <p><b>Source:</b> Project Location; Project Plans.</p>					
9.b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X

<p><b>Discussion:</b> Neither the project nor future development involves elements that would result in a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p> <p><b>Source:</b> Project Plans; Project Location.</p>					
9.c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
<p><b>Discussion:</b> The project does not include elements which would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. The project site is not located within one-quarter mile of an existing or proposed school.</p> <p><b>Source:</b> Project Plans; Project Location.</p>					
9.d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
<p><b>Discussion:</b> The project site is not included on a list of hazardous materials sites.</p> <p><b>Source:</b> California Department of Toxic Substances Control, Hazardous Waste and Substances Site List.</p>					
9.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?				X
<p><b>Discussion:</b> The project site is not located within 2 miles of a public airport or public use airport.</p> <p><b>Source:</b> Project Location.</p>					
9.f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X

**Discussion:** The project will not physically interfere with an adopted emergency plan. The proposed lot line adjustment does not require physical development for approval. The roadway to access the properties is existing and there is existing development along the road both before and after passing the site. Future development of the parcels will serve as infill development within an established neighborhood of low-density residential development. The current project has been reviewed by the responsible fire authority and received conditional approval. Any future development is not expected to impact any adopted emergency response plan or emergency evacuation plan.

**Source:** Project Application/Plans and San Mateo County GIS Resource Maps.

9.g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
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**Discussion:** The project site is located in a State Responsibility Area designated as very high severity for wildland fires. As noted previously, the lot line adjustment does not result in the creation of new parcels and future development will result in infill development. The project has been reviewed and received conditional approval from the responsible Fire Authority. Future development will be subject to review and approval by the Fire Authority and will be required to comply with applicable fire codes.

**Source:** Project Location; Project Plans.

9.h. Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
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**Discussion:** See discussion under 8.f., above.

**Source:** FEMA Flood Insurance Rate Map (Community Panel No. 06081C02820E, map effective October 16, 2012).

9.i. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				X
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**Discussion:** See discussion under 8.f., above.

**Source:** FEMA Flood Insurance Rate Map (Community Panel No. 06081C02820E, map effective October 16, 2012).

9.j. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
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**Discussion:** There are no levees or dams in the project vicinity which would expose people or structures to significant loss, injury or death involving flooding.

<b>Source:</b> Project Location; FEMA Flood Insurance Rate Map (Community Panel No. 06081C02820E, map effective October 16, 2012.				
9.k. Inundation by seiche, tsunami, or mudflow?				X
<b>Discussion:</b> The project site is not in a mapped hazard zone for seiche, tsunami, and/or mudflows. <b>Source:</b> Project Location.				

<b>10. HYDROLOGY AND WATER QUALITY.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10.a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?			X	
<b>Discussion:</b> The proposed lot line adjustment does not involve elements which would result in impacts to water quality or waste discharge requirements. However, at the time that future development is proposed it will be subject to the implementation and maintenance of an erosion control plan and Best Management Practices (BMPs) as part of issuance of the required building permit. In addition, the project will be subject to standard County drainage policies which require that new development incorporate measures into each design which can accommodate pre-construction levels of stormwater/drainage. Therefore, ensuring that the resulting project does not result in impacts. <b>Source:</b> Project Plans, San Mateo County Drainage Ordinance.				
10.b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
<b>Discussion:</b> Future development will have a municipal water connection provided by California Water Service Company. The project does not involve other elements that would impact groundwater supplies or interfere with groundwater recharge. <b>Source:</b> Project Plans.				



10.c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:				
i. Result in substantial erosion or siltation on- or off-site;			X	
<p><b>Discussion:</b> While no grading activities are necessary for the completion of the lot line adjustment, future development is expected to involve grading activities. As mentioned previously, the subsequent development of the project site will be required to comply with the standard requirements of submittal and implementation of an erosion control plan that would contain and slow run-off, while allowing for natural infiltration of water run-off. In addition, the project will be required, as is standard, to adhere to the San Mateo County-wide Stormwater Pollution Prevention Program “General Construction and Site Supervision Guidelines” and County’s Drainage Ordinance all of which include measures to address construction related erosion impacts.</p> <p><b>Source:</b> Project Plans; Project Location; County Grading Ordinance; County Drainage Ordinance.</p>				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				X
<p><b>Discussion:</b> Future development is subject to the County’s standard requirement that post-development stormwater flows not exceed pre-development levels. The future developer will be required to install and design development which complies with this requirement.</p> <p><b>Source:</b> Project Plans; Project Location; County Grading Ordinance; County Drainage Ordinance.</p>				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				X
<p><b>Discussion:</b> See discussion under 10.c.i and 10.c.ii above.</p> <p><b>Source:</b> Project Plans; Project Location; County Grading Ordinance; County Drainage Ordinance.</p>				
iv. Impede or redirect flood flows?				X
<p><b>Discussion:</b> The project site is not located within an area mapped for flooding.</p> <p><b>Source:</b> Project Location; FEMA Flood Zone Maps; San Mateo County Hazard Maps (GIS).</p>				
10.d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X

<b>Discussion:</b> The project site is not located within an area mapped for flooding, tsunami, or seiche zones.				
<b>Source:</b> Project Location; FEMA Flood Zone Maps; San Mateo County Hazard Maps (GIS).				
10.e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
<b>Discussion:</b> See discussion under 10.a., above.				
<b>Source:</b> Project Plans, San Mateo County Drainage Ordinance.				
10.f. Significantly degrade surface or ground-water water quality?				X
<b>Discussion:</b> See discussion under 10.a., above.				
<b>Source:</b> Project Plans, San Mateo County Drainage Ordinance.				
10.g. Result in increased impervious surfaces and associated increased runoff?				X
<b>Discussion:</b> See previous discussion under this Section.				
<b>Source:</b> Project Plans, Project Location; San Mateo County Drainage Ordinance.				

<b>11. LAND USE AND PLANNING.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Physically divide an established community?				X
<b>Discussion:</b> The proposed lot line adjustment will reconfigure the parcel boundaries between three existing parcels resulting in three conforming lots of adequate size and configuration to accommodate future infill development. The project site is located along a developed roadway where existing residential development is located before and after the project site. There is also existing development located in the surrounding Palomar Park and Crestview neighborhoods. The lot line adjustment and future development of the parcels will not physically divide an established community.				
<b>Source:</b> Project Location; Project Plans.				
11.b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

**Discussion:** The proposed project does not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The proposed project use is consistent with the applicable Zoning Regulations and General Plan Policies.

**Source:** Project Plans; Project Location; San Mateo County Zoning Regulations; San Mateo County General Plan.

11.c. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities, or recreation activities)?				X
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**Discussion:** The lot line adjustment will allow the reconfiguration of the subject properties into a size and configuration capable of supporting residential development. Any infrastructure improvements will be limited to the project site and while they will allow development of the subject parcels, they do not increase the development potential of presently undeveloped areas.

**Source:** Project Location; Project Plans.

**12. MINERAL RESOURCES.** Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				X

**Discussion:** The project site is not located in an area known to contain mineral resources nor does the project involve mineral extraction.

**Source:** Project Location; San Mateo County General Plan; San Mateo County GIS Resource Map.

12.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
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**Discussion:** See discussion under 12.a., above.

**Source:** Project Location; San Mateo County General Plan; San Mateo County GIS Resource Maps.

<b>13. NOISE.</b> Would the project result in:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13.a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
<p><b>Discussion:</b> While the proposed lot line adjustment will not result in any temporary or permanent increase in ambient noise, future development could result in temporary impacts. During project construction, excessive noise could be generated, particularly during grading and excavation activities. However, the project is subject to the County's Noise Ordinance which limits the days and hours of construction related activities. Once construction is complete, the project site is not expected to generate noise which would violate the San Mateo County Noise Ordinance.</p> <p><b>Source:</b> Project Plans, San Mateo County Noise Ordinance.</p>				
13.b. Generation of excessive ground-borne vibration or ground-borne noise levels?				X
<p><b>Discussion:</b> See discussion under 13.a., above.</p> <p><b>Source:</b> Project Plans, San Mateo County Noise Ordinance.</p>				
13.c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?				X
<p><b>Discussion:</b> The project site is not located within 2 miles of a public airport or public use airport.</p> <p><b>Source:</b> Project Location.</p>				

<b>14. POPULATION AND HOUSING.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
14.a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
<p><b>Discussion:</b> As mentioned previously, the surrounding parcels are largely developed and the infrastructure to serve the parcels is either existing or will be implemented on the resulting parcels. There is no element included in the proposed project scope which will result in unplanned or unexpected population growth.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
14.b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
<p><b>Discussion:</b> The subject parcels are currently undeveloped. Future development will result in new housing but will not require the displacement of existing people or housing.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				

<b>15. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15.a. Fire protection?				X
15.b. Police protection?				X
15.c. Schools?				X
15.d. Parks?				X
15.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				X

**Discussion:** The proposed lot line adjustment does not create any new parcels. The three subject parcels will be adjusted in size and configuration which will allow for future development. These parcels are located within a largely developed low-density residential neighborhood and future development will serve as infill development. As such current level of public services will not be significantly affected by the project and resulting future development.

**Source:** Project Location; Project Plans.

16. RECREATION. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
<p><b>Discussion:</b> Future development of the three parcels may result in minor increases in the use of parks and other recreation facilities. However, given that there is no increase in the number of parcels and that the project serves as infill development within an established residential district the small increase in use would not result in substantial physical deterioration of the facility would occur or be accelerated.</p> <p><b>Source:</b> Project Plans; Project Location.</p>				
16.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
<p><b>Discussion:</b> Neither the proposed project or the expected future residential development includes the creation of recreational facilities or requires the construction or expansion of recreational facilities.</p> <p><b>Source:</b> Project Plans.</p>				

<b>17. TRANSPORTATION.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
17.a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?				X
<p><b>Discussion:</b> The subject parcels are located along a private road accessed from Edgewood Road. The lot line adjustment does not include any modifications to the road. Future development may involve minor improvements but would not include elements which would conflict with a program plan, ordinance or policy addressing the circulation system.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
17.b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) <i>Criteria for Analyzing Transportation Impacts</i> ?  <i>Note to reader: Section 15064.3 refers to land use and transportation projects, qualitative analysis, and methodology.</i>				X
<p><b>Discussion:</b> The subject lot line adjustment does not result in the increase in the number of parcels. The future development of the resulting parcels would generally be exempt from CEQA review per Section 15303, Class 3 which allows up to three single-family residences in an urbanized area to be constructed or converted under this exemption. However, the eventual development of the lot is not expected to result in vehicle miles traveled sufficient to warrant additional evaluation.</p> <p><b>Source:</b> Project Location; Project Plans; CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387).</p>				
17.c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
<p><b>Discussion:</b> El Vanada Road is an existing improved private road which runs through the subject project site (via a dedicated access easement). The proposed lot line adjustment does not include any revisions to the existing access easement. While future development may include minor improvements to the road, they would occur within the existing access easement which is not currently laid out in a manner that results in a geometric design feature which would increase hazards.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
17.d. Result in inadequate emergency access?				X

**Discussion:** The project does not include any changes to the existing private roadway that serves the site. Future development may result in minor alterations, but these are not expected to be significant as the private roadway serves developed parcels beyond the project site. The current project has been reviewed by the responsible Fire Authority and was determined to have adequate existing emergency access.

**Source:** Project Plans.

<b>18. TRIBAL CULTURAL RESOURCES.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
18.a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)		X		
<b>Discussion:</b> See discussion under 5.a., above.				
<b>Source:</b> Project Location; California Historical Resource Information System (File No.: 23-1008; State of California Native American Heritage Commission.				
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. (In applying the criteria set forth in Subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)		X		



**Discussion:** See Discussion under 5.a., above.

**Source:** Project Location; California Historical Resource Information System (File No.: 23-1008; State of California Native American Heritage Commission.

<b>19. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
19.a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
<p><b>Discussion:</b> The lot line adjustment does not include utility extensions. However, future development will require extension of water service and installation of individual septic systems. However, given that the project vicinity is developed other utilities exist within the project area. While these extensions are expected to involve grading activities and perhaps some tree removal, they are not expected to be substantial in nature which would result in significant environmental effects.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
19.b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
<p><b>Discussion:</b> The project has received a conditional sign-off from the water provider for the area, California Water Service Company, that there is available water to serve the parcels.</p> <p><b>Source:</b> Project Location; California Water Service Company Review.</p>				
19.c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
<p><b>Discussion:</b> There is no municipal wastewater treatment provider for the project area. Future development of the parcels will require that each parcel will need to include the installation of an onsite wastewater treatment system (septic system). A preliminary review by the County's Environmental Health Services, the agency responsible for such systems, has determined that the installation of systems on the reconfigured parcels can comply with their established standards.</p>				

<b>Source:</b> Project Location; Project Plans; Review by County of San Mateo's Environmental Health Services.				
19.d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				X
<p><b>Discussion:</b> As the lot line adjustment does not include any physical development this phase of the project will not generate solid waste. Future development will result in generation of solid waste. However, the resulting three single-family residences do not include elements which would result in levels of solid waste that would impair any attainment goals. Finally, as mentioned previously, each parcel will be served by its own onsite wastewater treatment system (septic system) thereby avoiding impacts to the capacities of local infrastructure.</p> <p><b>Source:</b> Project Plans; Project Location.</p>				
19.e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X
<p><b>Discussion:</b> See discussion under 19.d., above.</p> <p><b>Source:</b> Project Plans; Project Location.</p>				

<b>20. WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
20.a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
<p><b>Discussion:</b> The project site is located within a state responsibility area identified as a very high fire hazard severity zone. As mentioned previously, the project site is located along an existing private road which has development both before and after the project site. The project will serve as infill development and will be required to comply with all applicable requirements of the responsible Fire Authority. The future development of the site will have no impact on any adopted emergency response or evacuation plan.</p> <p><b>Source:</b> Project Plans; Project Location; CAL-FIRE Fire Hazard Severity Zone Viewer; Review by San Mateo County Fire (CAL-FIRE).</p>				

20.b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
<p><b>Discussion:</b> As discussed, the project does not involve physical development. However, future development of the reconfigured parcels is anticipated. The future project will serve as infill development which is surrounded by low density residential development. Future development will be required to comply with all fire code requirements associated with very high fire severity zones. This would include but is not limited to the use of fire resistant materials, installation of fire sprinkler system, and the creation of defensible space around the developed areas as part of project construction. The surrounding area is sloped and there is a significant amount of tree cover. In the event there was a wildfire in the area the occupants would likely be exposed to pollutant concentrations and/or uncontrolled spread as would the other surrounding development. However, the incorporation of the fire reduction methods described would aid in minimizing impacts.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
20.c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
<p><b>Discussion:</b> The site is located along an existing privately maintained road which may require minor updates. These updates will be located within the existing access easement that runs through the properties. New electrical lines will be required to be installed underground in accordance with the requirement of the Design Review Zoning Regulations. Generally, any required improvements would reduce fire risks via improved access and emergency facilities to address emergencies. Given that the road is improved, much of the infrastructure is limited to the project site, and/or is located in close proximity future development and will have significant impacts to the environment.</p> <p><b>Source:</b> Project Plans; Project Location; San Mateo County Zoning Regulations; California Fire Code.</p>				
20.d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	
<p><b>Discussion:</b> While downslope landslides associated with post-fire slope instability are a possibility, all future development entitlements will require a geotechnical report and will be required to construct in accordance with the recommendations and under the observation of the responsible engineer. Compliance with these recommendations, geotechnical requirements, and standard building code should reduce impacts to less than significant.</p>				

**Source:** San Mateo County Geotechnical Hazards Synthesis Map; California Geological Survey - EQ Zapp; California Earthquake Hazards Zone Application; Project Location; County GIS Resource Maps, and Geotechnical Study prepared by Lee Engineers, Inc., dated April 2020.

<b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
21.a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
<p><b>Discussion:</b> While the lot line adjustment has no expected impacts, future development of the parcel may. Future construction, which is subject to its own entitlement process, could have impacts on cultural resources and temporary impacts associated with project construction. However, compliance with standard requirements of the CA building and fire codes, conditions of approval provided by the various responsible review agencies, and mitigation measures included in this document will reduce those impacts to less than significant.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
21.b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		X		
<p><b>Discussion:</b> See discussion under 21.a., above.</p> <p><b>Source:</b> Project Location; Project Plans.</p>				
21.c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

**Discussion:** See discussion under 21.a., above.

**Source:** Project Location; Project Plans.

**RESPONSIBLE AGENCIES.** Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
Bay Area Air Quality Management District		X	
Caltrans		X	
City		X	
California Coastal Commission		X	
California Department of Food and Agriculture		X	
County Airport Land Use Commission (ALUC)		X	
Other: _____			
National Marine Fisheries Service		X	
Regional Water Quality Control Board		X	
San Francisco Bay Conservation and Development Commission (BCDC)		X	
Sewer/Water District:		X	
State Department of Fish and Wildlife		X	
State Department of Public Health		X	
State Water Resources Control Board		X	
U.S. Army Corps of Engineers (CE)		X	
U.S. Environmental Protection Agency (EPA)		X	
U.S. Fish and Wildlife Service		X	

**MITIGATION MEASURES**

	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.	X	
Other mitigation measures are needed.		X

The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:

**Mitigation Measure 1:** Vegetation trimming/removal and initial earth work should be conducted outside the breeding season (September 1-January 31). If these activities occur during the breeding season, a qualified biologist will need to conduct a survey for nesting birds within five days prior to the proposed start of construction. If an active nest is detected in the construction area, work will be delayed until the young fledge, and/or a disturbance-free buffer will need to be established around the nest. California Department of Fish and Wildlife usually accepts a 50-foot buffer for passerine nests, and a 250-foot buffer for most raptor nests. A qualified biologist shall monitor the behavior of the birds at the nest site to ensure that they are not disturbed by project related activities. Nest avoidance and/or monitoring shall continue during project-related construction work until the young have fledged, are no longer being fed by the parents, and have left the nest site. At that time the nest buffer may be removed, and work may commence.

**Mitigation Measure 2:** Prior to issuance of the building permit and/or commencement to any project related activities the applicant shall provide a study of the project site completed by a qualified professional archaeologist. Any measures recommended by the archaeologist shall be implemented for the duration of the project.

**Mitigation Measure 3:** In the event that unanticipated cultural resources are exposed during ground disturbance activities, work within 15 meters (50 feet) of the find must stop and a Secretary of the Interior qualified archaeologist, must be notified immediately. Work may not resume until a qualified archaeologist can evaluate the significance of the find. If the discovery proves significant, additional work such as archaeological testing, data recovery, or tribal consultation may be warranted.

**Mitigation Measure 4:** Although not anticipated, there remains the potential for the inadvertent discovery of human remains during ground-disturbing activities. State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The San Mateo County coroner must be notified of the find immediately. If concentrations of prehistoric or historic-era materials are encountered during project activities, all work in the immediate vicinity shall cease until a qualified archaeologist can evaluate the finds and make recommendations.

**DETERMINATION** (to be completed by the Lead Agency).

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Planning Department.

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because of the mitigation measures in the discussion have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



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(Signature)

Senior Planner

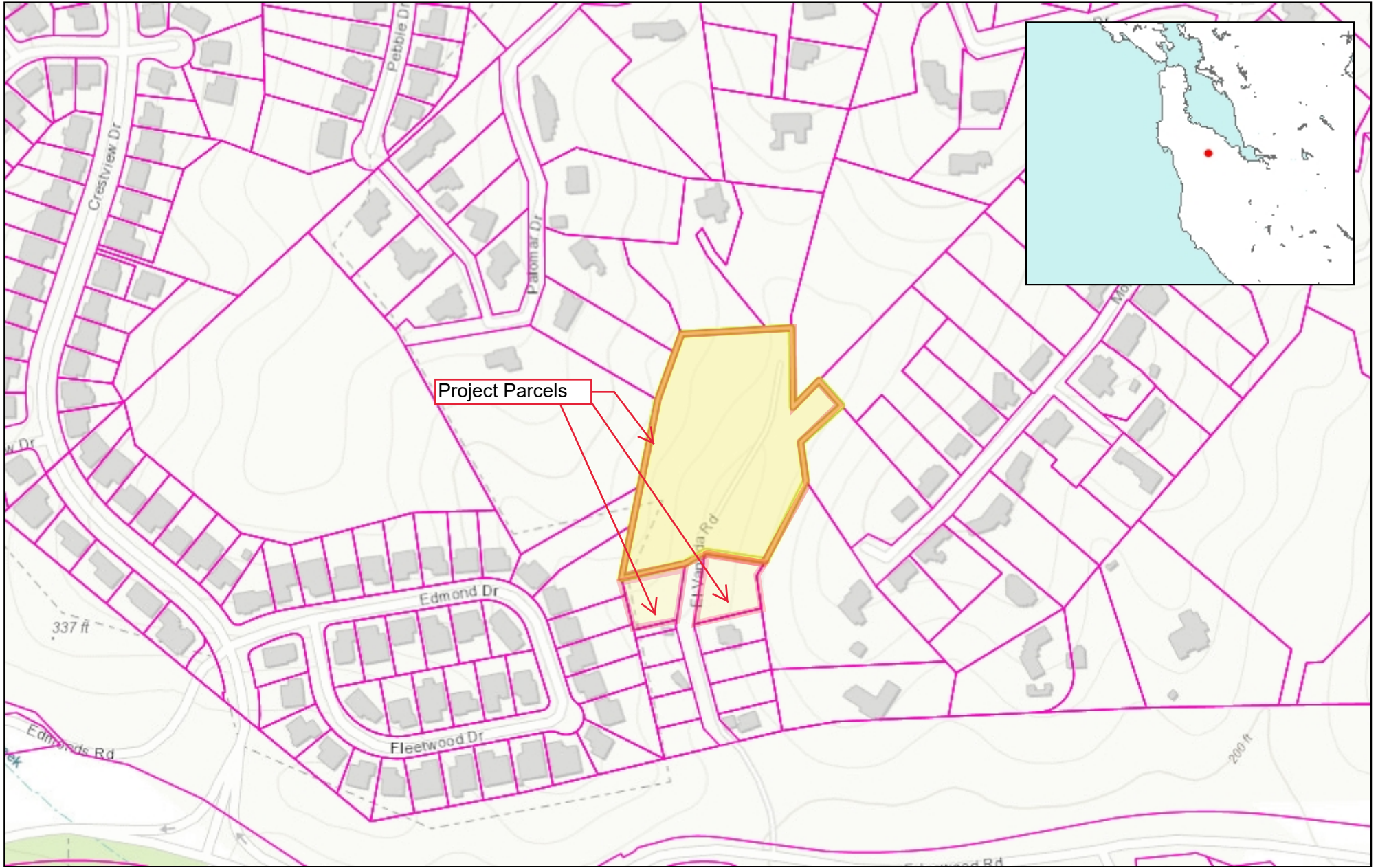
March 19, 2024

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Date

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(Title)



Project Parcels

0.14 0 0.07 0.14 Miles

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
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1:4,514



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**THIS MAP IS NOT TO BE USED FOR NAVIGATION**

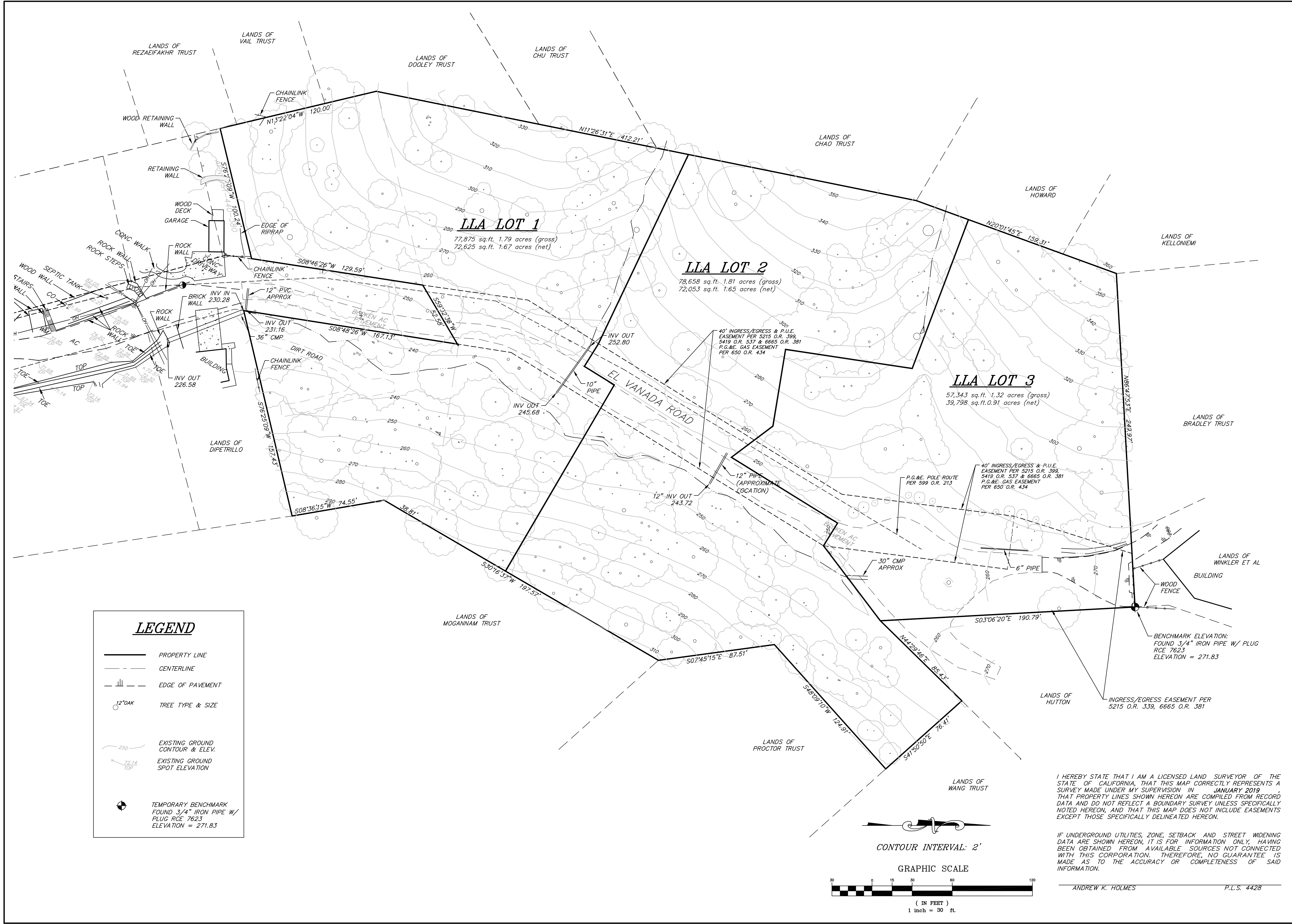


REVISIONS:	BY:

PREPARED FOR:  
S. EL VANADA LLC  
PO BOX 971  
SAN CARLOS, CA 94070

**LLA/ EASEMENTS EXHIBIT**  
**APNs 051-440-060, 070 & 390**  
 SAN MATEO COUNTY, STATE OF CALIFORNIA

DATE	09/16/2019
SCALE	1" = 30'
DRAWN	SR
JOB NO.	09.0333
DWG	C1
SHEET	2 OF 2

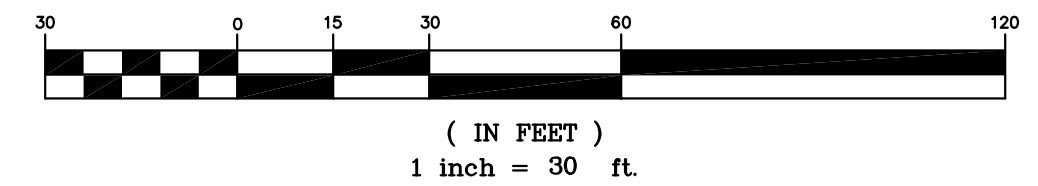


**LEGEND**

- PROPERTY LINE
- CENTERLINE
- EDGE OF PAVEMENT
- 12" OAK TREE TYPE & SIZE
- EXISTING GROUND CONTOUR & ELEV.
- EXISTING GROUND SPOT ELEVATION
- TEMPORARY BENCHMARK FOUND 3/4" IRON PIPE W/ PLUG RCE 7623 ELEVATION = 271.83

CONTOUR INTERVAL: 2'

GRAPHIC SCALE



I HEREBY STATE THAT I AM A LICENSED LAND SURVEYOR OF THE STATE OF CALIFORNIA, THAT THIS MAP CORRECTLY REPRESENTS A SURVEY MADE UNDER MY SUPERVISION IN JANUARY 2019 THAT PROPERTY LINES SHOWN HEREON ARE COMPILED FROM RECORD DATA AND DO NOT REFLECT A BOUNDARY SURVEY UNLESS SPECIFICALLY NOTED HEREON, AND THAT THIS MAP DOES NOT INCLUDE EASEMENTS EXCEPT THOSE SPECIFICALLY DELINEATED HEREON.

IF UNDERGROUND UTILITIES, ZONE, SETBACK AND STREET WIDENING DATA ARE SHOWN HEREON, IT IS FOR INFORMATION ONLY, HAVING BEEN OBTAINED FROM AVAILABLE SOURCES NOT CONNECTED WITH THIS CORPORATION. THEREFORE, NO GUARANTEE IS MADE AS TO THE ACCURACY OR COMPLETENESS OF SAID INFORMATION.

ANDREW K. HOLMES P.L.S. 4428