

# San Bruno Mountain HCP Amendment Environmental Impact Report/ Environmental Impact Statement

## Scope of Services

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Our approach for successfully completing the San Bruno Mountain habitat conservation plan amendment (HCPA) environmental impact report (EIR)/environmental impact statement (EIS) is presented in this scope of services. Our proposed scope of services is based on our understanding of the proposed HCPA described in the RFP, information provided at the pre-bid meeting on September 24, review of the original HCP, Jones & Stokes experience preparing and supporting HCPs and joint CEQA/NEPA compliance documents, and conversations with county staff, including a meeting with the County to discuss scope assumptions on November 4, 2003.

The approach outlined in this scope is to develop an EIR/EIS that relies heavily on work conducted by Thomas Reid Associates (TRA) in preparing the HCPA. The EIR/EIS will be focused primarily on direct and indirect impacts to listed butterfly species from issuance of an incidental take permit. Potential non-biological impacts resulting from HCPA management actions, such as air quality from controlled burns, will also be considered. It is assumed for the EIR/EIS that HCPA management activities will have very limited effects on issues other than biology, air quality, and fire safety and that the analysis of other resources areas in the EIR/EIS will therefore be very concise. We assume that direct and indirect impacts resulting from development-related HCPA covered projects (e.g., residential development, boys camp construction, interpretive center construction) have been or will be adequately addressed in past or future project-specific CEQA-compliance documents. Our approach assumes that the San Bruno Mountain HCPA EIR/EIS will substantially tier from the data, analysis, and alternatives developed for the HCPA. *These assumptions must be confirmed early in the project to ensure that it will meet County and USFWS priorities as well as regulatory mandates under NEPA and CEQA.*

This scope is divided by task according to the major milestones of the CEQA/NEPA process, including preparation of an administrative draft, draft, administrative final, and final EIR/EIS. Our approach does not include preparation of an initial study since USFWS has previously indicated that an EIS will be required for this project. The basic analysis presented in an initial study would provide little value to the County and USFWS since issues can be analyzed at the appropriate level in the EIR/EIS and, in the event of resource issues that are difficult to characterize at the outset (i.e., impacts to covered species), these issues can be more accurately characterized in the EIR/EIS. We have also identified several optional tasks.

The EIR/EIS will evaluate a reasonable range of alternatives, including the proposed action/project (i.e., the preferred conservation strategy), the no project/no action alternative (i.e., no HCPA or amended take permit issued), and a no new take alternative, as required by USFWS. The no new take alternative is expected to be infeasible. The EIR/EIS will also evaluate up to two action alternatives, in addition to the proposed action. These action alternatives will be limited to alternative conservation strategies (e.g., alternative management techniques, alternative management locations).

This scope and cost assumes that the base maps and content for most of the figures will be provided by TRA. It is assumed that any substantial revisions to the figure content that are requested will be performed by TRA and that minimal manipulation or creation of figures by Jones & Stokes will be required. Specific assumptions regarding figures is provided below under each relevant task.

## **Task 1. Project Initiation**

### **Task 1.1 Project Kickoff Meeting**

Following contract initiation, Jones & Stokes will participate in a meeting with the County of San Mateo Parks and Recreation Division, USFWS, and TRA staff to:

- obtain information and data, and develop a plan for gathering outstanding data;
- develop protocols for communication between the team members;
- confirm the scope of work;
- confirm the approach to NEPA/CEQA compliance; and
- confirm the schedule for the project.

A key objective of this meeting will be to clarify the scope and cost parameters for the analysis. Based on our conversations with the County, it is our understanding that the County views the action as approval of an HCPA for take of listed species and therefore believes that the analysis should focus on impacts to listed species from management activities and development. Other impacts related to development are to be addressed through project specific environmental documents or have been addressed by prior other environmental compliance processes. Jones & Stokes has considered this approach in formulating this proposal. Jones & Stokes will work with the County and USFWS to examine these assumptions, to consider the need (if any) for additional effort to meet regulatory requirements, and to revise the scope and cost, as necessary, before the EIR/EIS is initiated.

Another key objective of this meeting will be to refine the EIR/EIS schedule based on the status of the HCPA amendment. An accurate schedule will be essential to ensure that necessary inputs and outputs from the HCPA and EIR/EIS are properly timed to avoid inefficiencies.

**Deliverables:** Jones & Stokes will prepare a memo summarizing the meeting, and will prepare a finalized detailed schedule incorporating deadlines for preparation of material necessary for the EIR/EIS to be prepared by others.

## **Task 1.2 Notices of Preparation and Intent**

Jones & Stokes will draft a Notice of Preparation (NOP) and Notice of Intent (NOI). The NOP/NOI will include a general description of the HCPA, potential alternatives, and a preliminary list of issues to be addressed in the EIR/EIS. The content for a project location figure will be provided by TRA. Jones & Stokes will submit the NOP to the State Clearinghouse and provide a copy of the NOI to USFWS for submittal to the Federal Register. It is assumed that the County and USFWS will reproduce and distribute copies of the notices, as necessary, for the Federal Register, area newspapers, and interested parties.

**Deliverables:** Jones and Stokes will provide a hard copy and electronic copies of the NOP and NOI to the County and USFWS.

## **Task 2. Prepare Description of the Proposed Action/Project and Alternatives for EIR/EIS**

### **Task 2.1 Development of Proposed Action/Project and Alternatives**

It is assumed that the EIR/EIS will largely rely on the project description and alternatives developed by TRA for the HCPA. Jones & Stokes will work with the County and TRA to refine the project description for the proposed action/project (e.g. the HCPA) and alternatives as necessary for the EIR/EIS. The project description will include all elements required by State CEQA guidelines and USFWS NEPA guidelines. The project description will include a site location map, a site plan including HCP/HCPA parcels, and sufficient information to address the areas of potential environmental impact of concern.

Alternatives will be limited to those that reduce or avoid take of listed species. This scope and cost estimate assumes evaluation of three action alternatives, including the proposed action. Alternatives that may be considered for inclusion in the EIR/EIS are:

- No Action/No Project (continuation of existing HCP without amendment).
- Proposed Action (HCPA to add Callippe silverspot butterfly to cover take in designated development areas, update the HCP operating programs to administrative parcels, allow take of listed butterflies that may result from vegetation management, and update the HCP to reflect USFS 5-Point Policy guidelines);
- Excluding the Callippe silverspot from the HCPA (i.e., not adding it as a covered species);
- Habitat management alternatives (e.g., different management techniques, different management locations).

Jones & Stokes will prepare draft project description and alternatives for review by the County and USFWS. Following review and comment by the County and USFWS, Jones & Stokes will prepare a revised Project Description and Alternatives as a basis for proceeding with the analysis in the EIR/EIS. Jones & Stokes assumes that figures illustrating the features of the proposed project and the alternatives will be provided by TRA and will require minimal modification for use in the EIR/EIS.

This scope and cost assumes that no analysis will begin until the project description and alternatives have been completed. In addition, any revisions to the project description and alternatives following initiation of the EIR/EIS analysis may affect the scope and cost.

**Deliverables:** A draft description of the proposed project/action and draft alternatives will be distributed to the County and USFWS in electronic format for their review.

### **Task 3. Public Scoping**

Under this task, Jones & Stokes will conduct activities pursuant to the scoping requirements of CEQA and NEPA. Included in this task will be facilitation of one public scoping meeting. Jones & Stokes will prepare materials for the meeting, including handouts, sign-in sheets, and comment cards. Maps illustrating the proposed HCPA and alternatives will be provided by TRA and require only minimal modification by Jones & Stokes for this meeting. It is not assumed that any large display boards will be prepared or that a court reporter will be provided for the scoping meeting. It is assumed that the County and USFWS will be responsible for public notification of the scoping meeting beyond that already provided for under Task 1.2.

**Deliverables:** Jones & Stokes will provide a summary of the scoping meeting to both the County and USFWS.

### **Task 4. Prepare Administrative Draft EIR/EIS**

Jones & Stokes will prepare the administrative draft EIR/EIS in compliance with requirements of CEQA, NEPA, the County, and USFWS. A suggested format for the EIR/EIS is presented below.

#### **4.1 Executive Summary**

We propose to prepare an Executive Summary that meets the requirements of CEQA and NEPA and that is written as a true summary of EIR/EIS findings. The impacts and mitigation measures presented in the EIR/EIS will be presented in table format and will be placed at the end of the Executive Summary. The body of the chapter will contain a concise, clearly written summary of the proposed project's elements, alternatives analyzed, and key findings of the document.

## 4.2 Introduction

The Introduction to the EIR/EIS will clearly direct readers on how to find information in the EIR/EIS. It will also provide a brief history of the San Bruno Mountain HCP and previous environmental analysis, will explain the roles of the CEQA and NEPA lead agencies and the legal authorities guiding each, and it will explain the connection between the HCPA and the conclusions of the EIR/EIS.

## 4.3 Purpose and Need/Objectives of the Proposed Action

Developing a focused Purpose and Need/Project Objectives statement is an essential element of the document since it will provide the basis for the action and for defining the range of feasible alternatives that are considered in the EIR/EIS. This section of the EIR/EIS will fulfill both the requirements of NEPA (Purpose and Need) and CEQA (Project Objectives). It will contain the objectives of the proposed HCPA and the underlying need that the action seeks to fulfill.

## 4.4 Proposed Action and Alternatives

This section of the EIR/EIS will describe the Proposed Action/Project in terms that are suitable for an environmental document and a reasonable range of alternatives. It is assumed that up to three action alternatives will be analyzed in the EIR/EIS in detail, including the proposed action. The No-Project/No-Action Alternative will also be evaluated. These alternatives will be analyzed at the same level of detail as the proposed action to fulfill the requirements of NEPA and allow for a meaningful comparison of the impacts of the alternatives with those of the proposed action. As described under Task 2, Jones & Stokes will work with the County, USFWS, and TRA to refine project alternatives that would reasonably achieve the purpose and need of the proposed action. The EIR/EIS will also discuss those alternatives to the project that were considered for analysis, but rejected, and the reasons for rejection. As described previously, Jones & Stokes will rely on figures provided by TRA to illustrate features of the proposed action and alternatives.

## 4.5 Environmental Setting, Impacts, and Mitigation Measures

The EIR/EIS is presumed to focus on resource issues related to habitat management. Each setting and impact section will begin with a description of the setting for each resource topic. The setting will provide the baseline for comparison of the impacts from the proposed project/action. Each resource section will include a concise description of the methodology used in the impact analysis, and the standards used to determine whether an impact is significant. The standards of significance will be based on CEQA, NEPA, County, and USFWS guidance. The methodology for development of mitigation measures will also be described. It is expected that mitigation measures will primarily be in the form of policies to be incorporated into the HCPA, or design measures to be incorporated into the implementation sections and documents associated with the HCPA.

The HCPA, in addition to proposing new habitat management actions in conservation areas, is also going to allow a certain level of take within designated development areas. The effects of

that development (such as on traffic, water resources, or other subject areas) are presumed to either have been previously disclosed in prior environmental impact assessments or will be addressed through subsequent environmental compliance.

The resource topics to be evaluated in the EIR/EIS will ultimately depend on the nature of effects of the HCPA. For purposes of this scope, it is assumed that HCPA management activities will have very limited effects on issues other than biology, air quality, and fire safety. It is assumed that the analysis of other resources areas in the EIR/EIS will therefore be very concise.

#### 4.5.1 Biological Resources

Jones & Stokes will rely almost exclusively on the technical studies and other information previously gathered or prepared for the HCP or the HCPA. Jones & Stokes' biological team will conduct an independent review of the existing information, coordinate with resource agencies concerning identified issues of concern, conduct a reconnaissance-level field visit, and analyze existing field data. It is not assumed that it will be necessary to update data, fill data gaps, or improve mapping resolutions for biological resources.

Jones & Stokes will rely on the TRA data to develop GIS coverages of various biological and physical resources pertinent to the EIR/EIS study area. We also assume that color, georectified, aerial photographs at a scale of 1 inch = 400 feet or better resolution are available for interpretation of vegetation and land cover types.

The biological resource section of the EIR/EIS will include a setting section that describes existing resources in the HCP area. The setting section will be based on a review of existing information and data as well as any information gathered during site reconnaissance. This section will also contain a regulatory subsection that discusses the project's consistency with county, state, and federal policies and regulations.

To support the County and USFWS in their efforts to prepare an adequate biological resource analysis, Jones & Stokes will review and confirm the adequacy of existing studies and will:

- Obtain and review existing and available information that pertains to the project area. This will include a review of records from the California Natural Diversity Database (CNDDB) (2003), environmental documents prepared for the HCP area and other projects in the region, prior environmental impact assessments on San Bruno Mountain, and Jones & Stokes file information. This information will be used to develop lists of special-status species and other sensitive biological resources other than \_\_\_\_\_ that have the potential to occur in the project region.
- Coordinate with resource agencies. The purpose of this coordination effort will be to obtain additional information on special-status species, and to gather up to date information on the status of permitting and mitigation plans in process through the resource agencies' processes.

- Conduct a field visit to confirm baseline conditions and become familiar with the project site.

It is assumed that up to five figures will be provided for biological resources. Jones & Stokes assumes that TRA will provide the content for these figures in a suitable format and that minimal modifications will be required for use in the EIR/EIS.

The impacts and mitigation measures section of the EIR/EIS will include an evaluation of potential impacts by alternative on biological resources and will identify feasible mitigation measures to reduce potential impacts to a less than significant level. No new studies to develop or enable mitigation measures are assumed as part of this scope and cost. This scope also does not presume floristic surveys for special-status plant species nor species-specific wildlife surveys.

#### **4.5.2 Air Quality**

In the air quality analysis, Jones & Stokes will focus on potential emissions from controlled burns on San Bruno Mountain, where included in alternatives. The tasks involved in preparing the air quality analysis include the following:

- collect information from available data sources for use in the air quality setting section;
- summarize the environmental and regulatory setting;
- identify significance thresholds for air quality impacts, using the BAAQMD's CEQA guidelines;
- describe the methodology used to estimate air emissions;
- estimate emissions from controlled burns and summarize the results of the air quality analysis in a table showing estimated emission concentrations; and
- identify mitigation measures as necessary.

#### **4.5.5 Fire Safety and Services**

Given the proximity of existing (and future) development to areas of potential habitat management for listed species, fire safety and services related to prescribed fire use is an issue of analysis for the EIR/EIS. This section will evaluate prescribed burns in terms of the timing, location, frequency, intensity, and size in order to assess fire safety relative to adjacent development as well as impact on fire services in terms of responder capacity.

#### **4.5.6 Other Resource Sections**

The primary focus of the EIR/EIS analysis is expected to be biological resources, with a secondary emphasis on air quality and fire safety issues. As stated previously, it is assumed that impacts to resources, other than to listed species, from residential or other development will be addressed by other environmental review. Other CEQA/NEPA resource areas will be covered in the EIR/EIS at a more general level of analysis. These resources and a discussion of our

assumptions regarding the parameters of the EIR/EIS analysis are discussed below. This scope and cost assumes that figures will not be necessary for other resource areas.

- Cultural Resources – San Bruno Mountain is a sensitive area for cultural resources and thus management activities may have an impact on cultural resources. Jones & Stokes will address cultural resources by developing a sensitivity analysis of the proposed project area. The sensitivity analysis will include information obtained from a records search at the Northwest Information Center to document known resources and a focused field visit to assess sensitivity for the presence of archaeological and architectural resources. Jones & Stokes cultural resources staff will document the potential sensitivity of the proposed project area in a brief technical report outlining the actions that are necessary to comply with CEQA, NEPA, and Section 106 of the NHPA prior to the implementation of specific management practices. A map of the area of potential effect will be prepared, based on base maps provided by TRA, but no other cultural resource or sensitivity mapping will be prepared. This technical report will support the analysis included in the EIR/EIS. It is assumed that environmental review for specific development projects will adequately address resources in the development areas. Our estimate does not assume site evaluation of cultural resources or resource-specific mitigation.
- Soils, geology, and mineral resources – Likely HCPA impacts could include habitat management affects on soil erosion in conservation areas as well as impacts during construction or earth moving. It is assumed that standard BMPs will be adequate to address these concerns and a general analysis will be adequate.
- Visual, scenic, and aesthetic resources – Vegetation management may result in minor changes in the aesthetic setting. It is presumed that this would be addressed on a qualitative basis and that no mapping or visual simulations would be necessary.
- Traffic and transportation – Minor temporary contributions of additional traffic from management activities are presumed to have limited impact area roadways. Traffic associated with facilitated development would be noted, but not analyzed in this document.
- Noise – Minor temporary construction and traffic noise from management near existing residential development would be addressed. It is assumed that these effects are minor and temporary and that standard BMPs would be adequate mitigation.
- Population and housing – Our proposal assumes that development covered in the HCPA is foreseen in local land use and housing plans and analyzed in detail in separate environmental analysis.
- Recreation – The impact and timing of habitat management could have minor temporary effects due to restrictions on recreational use of parts of the Mountain and would be addressed.
- Utilities and Public Services – Habitat management and new HCPA biological constraints may effect utility line maintenance activities and timing and will be discussed in the document. Demand for public services from facilitated development is presumed to be addressed separately in project-specific environmental compliance documents.



- Hazardous waste and materials – Use of petroleum and hazardous materials for habitat management activities is presumed to be addressed through standard BMPs. No extensive analysis (such as a risk assessment) of hazards of potential herbicide use is presumed. A qualitative assessment is presumed instead.
- Water resources - Impacts of different habitat management actions, such as fire management or other means of vegetation control, on water quality are presumed to be limited.

Our presentation of these other resource areas will draw on existing city and County documents and prior environmental impact assessments, wherever feasible. Each resource area will identify impacts by alternative and present mitigation for significant impacts. Because some of the covered development may have already completed CEQA, the document will note this where appropriate and identify the adopted mitigation pursuant to that prior process.

#### 4.6 Other Required Analysis

This section will provide other areas of analysis required under CEQA, NEPA or other regulatory controls. These include analysis of:

- cumulative impacts;
- irreversible environmental changes;
- the relationship between short-term uses of the environment and maintenance and enhancement of long-term productivity;
- significant, unavoidable environmental effects;
- growth-inducing impacts; and
- analysis of the project in relation to relevant federal executive orders.

Development of a cumulative impact analysis will be a primary focus of this section to ensure the document fulfills the requirements of CEQA and NEPA. Jones & Stokes will work with the County and USFWS to develop an appropriate background for analysis of cumulative impacts. We anticipate analyzing cumulative effects within both a “near field” and a “far field” study area.

The “near field” study area would be San Bruno Mountain and the immediately adjacent areas of suitable habitat for covered species. Currently proposed or future potential development in immediately adjacent areas outside of the HCP/HCPA project area would be identified from existing city and county planning documents.

The “far field” study area would consist of the range of extant populations of the listed butterfly species affected by the HCP/HCPA. In specific, this “far field” would include the following: Mission blue butterfly (Twin Peaks in San Francisco; Fort Baker in Marin County; and San Bruno Mountain); San Bruno elfin butterfly (portions of San Francisco peninsula); Callippe silverspot butterfly (portion of Alameda County and San Bruno Mountain); and Bay checkerspot butterfly (portions of San Mateo and Santa Clara counties). The purpose of the “far field” analysis is to examine cumulative impact on a general basis to all of the extant populations. This

discussions, while necessarily general in nature, will allow the impacts of the HCPA and alternatives to be understood on a broader, "whole of the species" level. The status of other extant areas and potential threats for each of these areas would be identified from existing documentation collected as part of data collection for biological resources. "Far-field" analysis will rely largely on species data for other populations provided by TRA. Jones & Stokes will prepare up to two figures illustrating "near-field" and "far-field" cumulative conditions.

#### **4.7 Agencies and Persons Contacted, References and Literature Cited, and Report Preparers; Glossary**

The EIR/EIS will contain this information as required by CEQA and NEPA guidelines.

#### **4.8 Administrative Draft EIR/EIS (ADEIR/EIS) Document Preparation**

Jones & Stokes will submit one unbound, reproducible copy and a PDF copy of the ADEIR/EIS to the County. It is assumed that the County will provide copies to all reviewers. We assume that the County and USFWS will each provide comments on the document and that Jones & Stokes will consolidate the comments for review.

### **Task 5. Prepare Draft EIR/EIS**

#### **Task 5.1 Draft EIR/EIS**

Following receipt of comments on the administrative draft EIR/EIS, Jones & Stokes will meet with County, USFWS, and TRA staff to review the comments. Following this meeting, Jones & Stokes will prepare the draft EIR/EIS, incorporating changes in response to the comments on the ADEIR/EIS. It is assumed that the County will submit required copies of the draft EIR/EIS to the California State Clearinghouse

Under this task, Jones & Stokes will also facilitate a public hearing for the draft EIR/EIS following public release. Jones & Stokes will provide logistical support and materials for the hearing. It is not assumed that any large display boards will be prepared or that a court reporter will be provided for the hearing. It is also assumed that the County and USFWS will be responsible for public notification of the hearing beyond that already provided for under Task 5.2 below.

**Deliverables:** Jones & Stokes will provide one unbound, reproducible copy of the draft EIR/EIS to the County and 50 CD copies of the draft EIR/EIS for public distribution. Jones & Stokes will also submit on CD copy of the draft EIR/EIS in a format (PDF or html) for posting on the web. It is assumed that the County and/or USFWS will be responsible for reproduction and distribution of any additional hard or CD copies of the EIR/EIS.

## Task 5.2 Notices

Jones & Stokes will prepare and submit the Notice of Availability (NOA) for mailing, publication in newspapers, and Federal Register publication, and a Notice of Completion (NOC) for State Clearinghouse distribution.

**Deliverables:** Jones & Stokes will provide a copy of the NOA and NOC to the County and USFWS. It is assumed that the County and USFWS will reproduce and distribute copies of the notices.

## Task 6. Prepare Draft Response to Comments and Administrative Final EIR/EIS

Following the close of the Public Comment period on the draft EIR/EIS, Jones & Stokes will prepare responses to substantive comments received on the EIR/EIS. This scope and estimate assumes that there will be only a moderate level of public interest and that a maximum of fifteen (15) comment letters will be submitted on the draft EIR/EIS. It is further assumed that comments on the draft EIR/EIS will not result in the need for analysis of issues not covered in the draft EIR/EIS, and will not require additional substantial technical analysis or modeling. Following the receipt of all of the comments on the draft EIR/EIS, Jones & Stokes will assess the level of effort required for responses, relative to the budgeted level of effort, and determine whether the existing budget is adequate to address substantial comments received.

It is expected that the County and USFWS will supply Jones & Stokes with a complete copy of all comments to which the County and USFWS expects responses to be prepared.

We recommend early coordination between Jones & Stokes, the County, TRA and USFWS on the appropriate level of response to the comments. Jones & Stokes will meet with the County and USFWS to discuss the approach to response preparation, resulting in agreement on the approach for each major comment. We presume to employ a "master response" approach to increase efficiency.

Jones & Stokes will prepare the mitigation monitoring and reporting program (MMRP) for inclusion in the administrative final EIR/EIS. The MMRP will:

- identify each impact of the project that will be mitigated,
- contain a brief explanation of each relevant mitigation measure,
- specify the agency or individual responsible for implementing and monitoring each mitigation measure, and
- state when and how frequently each mitigation measure should be implemented.

Jones & Stokes will coordinate with the County and USFWS during preparation of the MMRP regarding the format of the MMRP and the relative monitoring responsibilities of County and USFWS agencies.

The administrative final EIR/EIS will include:

- Response to Comments document containing all of the comments made as well as responses;
- EIR/EIS text, revised as necessary based on responses to comments on the draft EIR/EIS; and
- MMRP.

**Deliverables:** Jones & Stokes will submit one unbound, reproducible copy of the administrative draft final EIR/EIS to the County. It is assumed that the County will provide copies to all reviewers.

## Task 7. Prepare Final EIR/EIS

Following receipt of the County and USFWS's comments on the draft Response to Comments and administrative final EIR/EIS, Jones & Stokes will meet with County and USFWS staff to review all of the County and USFWS comments and agree on the appropriate responses to those comments. Following this meeting, Jones & Stokes will prepare final EIR/EIS, incorporating changes in response to the County and USFWS's comments on the administrative draft. Jones & Stokes will also revise the MMRP based on comments on the administrative final EIR/EIS and MMRP. Jones & Stokes will prepare the notice of completion (NOC). It is assumed that the County will submit the NOC and any copies of the final EIR/EIS to the California State Clearinghouse and will provide payment for the California Department of Fish and Game review fee upon completion of the final EIR/EIS.

**Deliverables:** Jones & Stokes will submit one unbound reproducible copy of the final EIR/EIS and MMRP to the County and 50 CD copies for public distribution. Jones & Stokes will also submit on CD a copy of the final EIR/EIS in a web compatible format. It is assumed the County and/or USFWS will reproduce and distribute any necessary copies of the final EIR/EIS.

## Optional Task 8: Develop Analysis of Conservation Funding Methods

If requested by the County, EPS and Jones & Stokes can analyze conservation funding methods and develop alternative funding strategies for the proposed HCPA.

### 8.1 Funding Sources and Strategy

EPS would work with the County, USFWS, the HCPA team, and Jones & Stokes to develop a funding strategy that can cover the costs of plan implementation. The steps required to develop the strategy would include a presentation of all potential funding sources, a more detailed evaluation of funding sources that appear most suitable for the plan; and the selection of a set of funding sources that could cover plan costs under the different alternatives.

Potential funding sources could include developer-based mitigation fees, state and federal grants, land acquisition by other agencies that may count towards plan goals, and local funding mechanisms such as assessment districts and voter-approved special taxes. The benefits and drawbacks of each source based on statutory requirements, previous successes in other HCPA funding regimes, and political considerations would all be described. For example, the ability of development to bear additional cost burdens through mitigation fees would be evaluated to ensure that new development would not be rendered infeasible. Input from the USFWS would be vital to ensure that the funding sources selected as part of the ultimate funding strategy meet specific requirements of these agencies.

Supplemental funding strategies would also be recommended to deal with potential cost increases over time; the uncertainty of funding from some sources; the need for HCPA start-up costs; and the annual nature of operations, management, and maintenance costs. Potential strategies would include building in buffers to fees on development, pursuing up-front grants to cover HCPA start-up costs and/or endowments to generate interest for operations and maintenance costs, and establishing a land banking acquisition strategy where early funding is sought to purchase land at existing prices. The ultimate funding strategy would also be attuned to the institutional framework for the HCPA and input from the participating jurisdictions, including any intergovernmental agreements and the implementing agreement with the regulating agencies.

## 8.2 Benefits Analysis

EPS would compare the current regulatory regime with likely permitting requirements under each of the proposed HCPA alternatives to evaluate potential plan benefits to the development community. This analysis would use descriptions of current regulatory requirements developed in previous tasks as well as interviews with developers and public agencies to establish a description of the current situation. The current situation would then be compared to the plan in terms of regulatory uncertainty, time delay, and cost, among other relevant factors.

## 8.3 Landowner Incentives

EPS would develop a list of potential incentives to landowners participating in the proposed plan. These could include financial remuneration for development rights that otherwise might be hard to “cash in”, and potential tax benefits through donations. EPS would prepare a concise summary document that can be used to demonstrate those benefits to landowners and other stakeholders.

## 8.4 Grant Applications

As an additional task, the Jones & Stokes team could provide grant-writing services to the County. The experience of EPS staff, particularly Teifion Rice-Evans, in identifying and pursuing funding sources for plan development and implementation could be used to support the Counties’ efforts to keep the planning effort well funded and to “kick-start” implementation of the HCPA following its approval.

Because such an evaluation is not clearly specified in the RPF, and the parameters of this analysis would need to be defined in consultation with the County, USFWS, and TRA, a cost for this task is not included in our present estimate. We would be happy to describe this task and its cost more fully with the County.

### **Optional Task 9. Additional Field Surveys**

No specific surveys are proposed at this time and thus no scope of work or estimate of costs is presented in this proposal.

### **Optional Task 10. Additional Public Involvement and Outreach**

No specific public outreach is proposed at this time and thus no scope of work or estimate of costs is presented in this proposal.

# Key Assumptions for Scope of Work and Cost Estimate

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This scope of work and cost estimate are based on the following key assumptions:

- The EIR/EIS will focus on resource issues related to habitat management activities. We assume that direct and indirect impacts of covered development projects for all resources other than listed butterfly species, have been or will be adequately addressed in past or future project-specific CEQA-compliance documents. This EIR/EIS will not address the direct or indirect impacts of these development projects. Non-biological resource issues will be addressed only to the extent that habitat management would affect them. These discussions will be as succinct as possible and will rely heavily on incorporation by reference of previous planning and environmental documents.
- A cultural resources sensitivity analysis of the HCPA permit area will be conducted based on a records search and focused field visit. Jones & Stokes will prepare an APE map, based on maps provided by TRA, but will not provide cultural resource or sensitivity mapping. Jones & Stokes will not evaluate cultural resources or develop site-specific mitigation.
- Jones & Stokes will rely heavily on the project description and alternatives developed by TRA for the HCPA for the alternatives in the EIR/EIS. We assume that it will require only minimal effort to modify and incorporate the material provided by TRA into the EIR/EIS. This scope and cost assumes that no analysis will begin until the project description and alternatives have been completed. In addition, any revisions to the project description and alternatives following initiation of the EIR/EIS analysis may affect the scope and cost.
- This scope and estimate assumes evaluation of three action alternatives, including the proposed action. The action alternatives will be limited to those that reduce or avoid take of listed species and to alternative conservation strategies (e.g., alternative management techniques, alternative management locations). Alternative development footprints, development locations, or development densities will not be considered. We will also consider the no new take alternative, as required by USFWS; we assume this alternative will be deemed infeasible.
- This scope assumes a total of six meetings, including:
  - one project initiation meeting (Task 1);
  - one public scoping meeting (Task 3);
  - one meeting to review comments on the administrative draft EIR/EIS (Task 4);
  - one public hearing on the draft EIR/EIS (Task 5);

- one meeting to review public comments on the draft EIR/EIS and to agree on the appropriate responses to those comments prior to preparation of the administrative final EIR/EIS (Task 5); and
  - one meeting to review comments on the administrative final EIR/EIS (Task 6).
- The scope assumes that up to two staff will attend one scoping meeting and one public hearing on the Draft EIR/EIS. Jones & Stokes will provide handouts and support for these meetings but large poster boards will not be prepared and a court reporter will not be provided.
  - We assume that TRA will provide all base maps and most content for graphics and will require minimal modification by Jones & Stokes. This scope and estimate assumes that up to five figures will be provided for biological resources. This scope assumes that no figures will be necessary for resource areas other than biological resources.
  - Jones & Stokes will largely rely on data provided by TRA for butterfly populations outside the HCPA permit area to assess potential cumulative impacts. Jones & Stokes will prepare up to two figures illustrating cumulative activities that may affect the listed butterfly species, one of which will illustrate cumulative activities around San Bruno Mountain and rely on base map and content provided by TRA.
  - This scope does not include updating data, filling data gaps, or improving mapping resolutions for biological resources. Jones & Stokes will rely on the TRA data to develop GIS coverages of various biological and physical resources pertinent to the HCPA permit area. We also assume that color, georectified, aerial photographs at a scale of 1 inch = 400 feet or better resolution are available for interpretation of vegetation and land cover types. Jones & Stokes assumes that all data received from TRA will be accurate for purposes of analysis and mapping of resources.
  - This scope of work assumes that one administrative draft each of the draft and final EIR/EIS will be prepared and submitted simultaneously to the County and USFWS. If USFWS or the County requests additional review drafts or screen check copies of the draft or final EIR/EIS, these would be at additional cost.
  - This scope of work assumes that comments from the County and USFWS will be sorted and any conflicts among comments will be reconciled prior to Jones & Stokes receiving them. (Comments from the County and USFWS can be received separately.)
  - San Mateo County's legal counsel will provide any necessary input and direction on legal issues encountered during the EIR/EIS process. David Nawi will provide minimal legal support and will largely be relied upon to facilitate or coordinate efforts with USFWS.
  - All reproduction and distribution of deliverables will be provided by the County and/or USFWS. Jones & Stokes will not maintain a mailing list for the project or distribute documents beyond that described in this scope of work.



- This scope includes biological reconnaissance for the Jones & Stokes team to familiarize themselves with the resources in the HCPA project area, but does not include additional field surveys, data collection or species-specific surveys.
- This scope of work assumes a maximum of fifteen (15) comment letters will be received and responded to for the draft EIR/EIS. These 15 letters will be of short to moderate length (no more than 10 unique comments each) and will not have been prepared by outside technical experts hired by project opponents. These comments will not necessitate analysis of issues that were not covered in the draft EIR/EIS, or additional substantial technical analysis. Following the receipt of all of the comments on the draft EIR/EIS, Jones & Stokes will assess the level of effort required for responses, relative to the budgeted level of effort, and determine whether the existing budget is adequate to address substantial comments received. The County's legal staff will provide direction and assistance in developing responses to any comments on the legal adequacy of the EIR/EIS.
- Jones & Stokes will not distribute notices or submit notices to the California State Clearinghouse. No other distribution, publication, or noticing is included in the scope. Jones & Stokes' estimate does not include payment of the California Department of Fish and Game review fee required upon completion of the final EIR/EIS.



**Bay**  
**JONES & STOKES ASSOCIATES**  
**Standard Billing Rates Effective January 1, 2003**  
Billing rates are subject to revision effective January 1 of each year

<b>Labor Classifications</b>	<b>Per Hour</b>
Principal	158.00-195.00
Associate Principal	135.00-150.00
Senior Environmental Scientist/Engineer/Planner	120.00
Environmental Scientist/Engineer/Planner	110.00
Environmental Specialist IV	105.00
Contracts Manager	94.00
Administrative Manager	N/A
Environmental Specialist III	94.00
Environmental Specialist II	83.00
Environmental Specialist I	70.00
Technical Writer	75.00
Technical Editor	70.00
Graphic Artist	68.00
Communications Specialist	52.00
Technician	50.00
Administrative Technician	50.00
Intern	45.00
Clerical Assistant	45.00

Testimony as expert witness at court trials, administrative hearings, and depositions will be billed at 150% of the above rates.

**Other Direct Expenses**

Microcomputer Time	\$12.00/hour
Computer mapping and image editing work station time (GIS, CAD)	16.00/hour
Blueprints/Color prints	\$0.30/square foot
Report reproduction, photocopying	0.08/page
Automobile mileage at current IRS rate or	0.345/mile
Laptop computer	10.00/day
Cellular telephone	10.00/day

A general and administrative charge of 9.5% will be applied to all other direct costs, inclusive of subcontractor charges.  
Per diem is charged at \$145.00/day. A lodging surcharge may apply in high rate areas.

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**Prompt Payment**

Jones & Stokes Associates clients may reduce any current invoice by (1%) of the billed amount if payment is made within 10 business days of receipt of said invoice.

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**CONFIDENTIAL**