TO: Brisbane Planning Department FROM: Dana Dillworth RE: Environmental Assessment for MK Pipeline Proposal August 24,2023

Below are some issues raised after reading the Environmental Assessment, Attachment E:

A four-hour visual observation after an extended drought is not an adequate assessment of this area. The presence of checkerspot larvae is more than hopeful, imagine if the preparers had actually done transects and multi-season observations, imagine what their findings would be.

I have observed large shore birds (Great Blue Heron and Snowy Egret) roost in the eucalyptus at sunset. On one hike with David Schooley, I stumbled into a bee hive and had to hurry home to quell the swelling of several stings. Point is, while this isn't an UNESCO World Heritage Site, the habitat deserves a fair review and a better understanding of its place on San Bruno Mountain. It is only through dedicated observers, over time, that rare Lessingia, Helianthus, and Hawkweeds have been discovered on San Bruno Mountain.

Here's some information about the prior season, some new discoveries in the area, that are not noted in this document: <u>https://www.mountainwatch.org/mountain-journal/2021/8/20/summer</u>

I ask that each Planning Commissioner, Council member, and Planning Department member get a copy of David Nelson and Doug Allshouse's book <u>San Bruno Mountain: A Guide to the Flora and Fauna.</u> It is an extraordinary resource and should be referenced here.

## https://www.heydaybooks.com/catalog/san-bruno-mountain

I don't understand how one totally degraded NCRO acre (more than 50% developed) can be the standard measurement for fourteen others that have different (scrub) qualities and different uses (BA Open Space).

Page 27 of the assessment speaks to fragmentation of habitat without mentioning the other HCP approved remedies that have been permitted in this area. Did the Thomas properties construct their habitats and are they viable? What are their status?

Is money to the City of Brisbane for future acquisition the only solution? Based on the city selling off Brisbane Acres under closed session and negotiating our Rails-to-Trails lands to developers under closed session and the abuse of categorical exemptions, I suggest that a Habitat Trust and Easement System be developed was recommended in our Open Space Plan. You are fragmenting the process by allowing one bad acre to spoil the rest.

A question of the need to clear the fuel load for fire safety vs. leaving flammable eucalyptus in place for habitat needs to be discussed. There could be a hybrid solution.

I expect better from folks who have studied biological systems. I would like to see San Mateo County's and Fish and Wildlife's response to compliance with the HCP, as well as the County Fire Authority weighing in on this application, as these approvals are mentioned in the staff report. Somehow a chance to improve the environment is missing in the documents presented that you are being asked to approve tonight.

I would send this back to the Planning Department and require more information consistent with our General Plan's goals.

Thank you.

Attachments: Google Map "Stanislaus Trail - Washed-out Roadway 1936"

