

Technical Memorandum

To: LINDSAY VIVIAN
Office Chief, Environmental Analysis
Division of Environmental Planning and
Engineering
Caltrans District 4

Date: April 12, 2022

From: ARNICA MACCARTHY *AM*
Senior Environmental Planner
Marin and Sonoma Branch
Division of Environmental Planning and
Engineering
Caltrans District 4

Subject: **DRAFT ESCADERO CREEK BRIDGE RAILING REPLACEMENT PROJECT
EVALUATION OF POTENTIAL SECTION 4(F) RESOURCES AND DE MINIMIS
IMPACT DETERMINATION**

1. INTRODUCTION.

This Section 4(f) Evaluation document has been prepared in tandem with the Pescadero Creek Bridge Railing Replacement Coastal Development Permit (CDP) application. This technical memorandum provides the documentation to support determinations required to comply with the provisions of 23 United States Code (USC) 138 and 49 USC 303, hereafter referred to as Section 4(f).

This evaluation has been prepared in accordance with the legislation established under the United States Department of Transportation Act of 1966 (23 USC 138; 49 USC 303). Additional guidance was obtained from Federal Highway Administration Technical Advisory T6640.8A (FHWA, 1987) and the revised FHWA Section 4(f) Policy Paper (FHWA, 2012).

1.1. SECTION 4(F) OVERVIEW

Section 4(f), codified in federal law in 49 USC 303, declares that "it is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites." Section 4(f) protected resources include publicly owned parks; recreational areas of national, state or

local significance; publicly owned school playgrounds, wildlife, or waterfowl refuges; or lands from a historic site of national, state, or local significance.

Section 4(f) specifies that the Secretary of Transportation may approve a transportation program or project requiring the use of publicly owned park land, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) only if:

- there is no prudent and feasible alternative to using that land; and
- the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

If historic sites are involved, then coordination with the State Historic Preservation Officer (SHPO) is also needed.

1.2. SECTION 4(F) USE DEFINITIONS

When a proposed project is adjacent to or on a property protected under Section 4(f), the impacts of the proposed project must be evaluated. Section 4(f) defines the impact level by types of "use." These "uses" occur when any of the conditions discussed in the following subsections are met.

Permanent/Direct Use

A permanent use of a Section 4(f) resource occurs when property is permanently incorporated into a transportation facility. Permanent use may occur as a result of partial or full acquisition or a permanent easement that allows permanent access onto the property for maintenance or other transportation related purposes.

Constructive Use

A constructive use of a Section 4(f) resource occurs when a transportation project does not permanently incorporate land from the resource, but the project's proximity results in impacts so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only if the protected activities, features, or attributes of the resource are substantially diminished.

Temporary Occupancy

A temporary use of a Section 4(f) resource results when Section 4(f) property is required for project construction-related activities, the property is not permanently incorporated into a transportation facility, and the activity is not

considered adverse by the agency with jurisdiction in terms of the preservation purpose of Section 4(f).

Temporary impacts to a Section 4(f) property may trigger the application of Section 4(f). 23 Code of Federal Regulations (CFR) 774.13(d) defines the following five temporary occupation exception criteria that must be met to determine that a temporary occupancy does not rise to the level of permanent/direct or constructive use for the purposes of Section 4(f):

- Duration is temporary (i.e., the occupancy is shorter than the time needed for construction of the project and there is no change in ownership of the property).
- Scope of work is minor (i.e., the nature and magnitude of the changes to the Section 4(f) properties are minimal).
- There are no anticipated permanent adverse physical impacts or permanent interference with the protected activities, features, or attributes of the property.
- The property is restored to the same or better condition that existed prior to the project.
- There is documented agreement from the appropriate federal, state, or local officials exists having jurisdiction over the property regarding the previously listed conditions.

De minimis Impact Determinations

When impacts to a Section 4(f) property are minor, as agreed to by the agency with jurisdiction over that property, Section 4(f) regulations can be satisfied through a *de minimis* determination.

De minimis impact is defined in 23 CFR 774.17 as follows:

- For parks, recreational areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that would not adversely affect the activities, features, or attributes qualifying the property for protection under Section 4(f).
- For historical sites, *de minimis* impact means that Caltrans has determined that, in accordance with 36 CFR 800, no historical property is affected by the project or the project would have “no adverse effect” on the property in question. The SHPO and Advisory Council on Historic Preservation, if involved, must be notified that Caltrans intends to enter a *de minimis* finding for properties where the project results in “no adverse effect.”
- The officials with jurisdiction must concur in writing with a *de minimis* determination. For recreational or refuge properties, concurrence from the officials having jurisdiction over the properties is required. For historical sites, concurrence from the SHPO is required.

2. PROJECT DESCRIPTION

The Pescadero Creek Bridge Railing Replacement Project (Project) would occur on and nearby the Pescadero Creek Bridge on State Route 1 (SR 1) in San Mateo County, at Post Mile (PM) 14.

The purpose of the Project is to upgrade the bridge railing systems on the Pescadero Creek Bridge. The Project is needed to enhance highway safety by reducing the severity of potential vehicle collisions and to protect the structural integrity of the bridge.

The Project would be constructed in two stages. The first stage would involve removal and replacement of the Eastern railing with controlled one-way reversing traffic shifted to the West (Southbound lane). In the second stage, traffic would be shifted to the East (Northbound lane) and the Western railings would be removed and replaced.

Traffic would be separated from construction in both stages by a temporary K-rail. K-rails are portable concrete barriers that provide safety for both workers and the travelling public. Caltrans would use one-way reversing traffic control with signage and flaggers at both ends of the bridge for the duration of the one lane closures.

After traffic is shifted, the next order of work for both stages would be to install a temporary containment platform along the entire length of the bridge, approximately 380 feet. The containment platform would be used as fall-protection for workers as well as containment for construction debris. Debris generated from this Project would include concrete material and water from saw-cutting blades. The containment platform would prevent debris and wastewater from entering Pescadero Creek and adjacent upland areas. The containment platform would be supported by deck overhang brackets, which would need to be installed throughout the span of the bridge and the length of the wingwalls. The brackets would be installed using an under-bridge inspection and utility truck; a flatbed truck with a long, flexible mechanical arm connected to a basket for carrying construction personnel. A worker in the basket would anchor the brackets into the bridge concrete using hand tools. After installing the containment platform, the existing bridge rails would be demolished.

Since construction in 1991, vegetation has grown on and under the current bridge rail barriers and Metal Beam Guard Rail (MBGR). In October 2021 Caltrans staff determined that the vegetation would need to be removed to provide construction crew access to the barrier for demolition and replacement. Some of the vegetation is located on Pescadero State Beach. An

area of approximately 1,660 square feet would be cleared of vegetation for Project activities including:

- 600 square feet (120 feet long, 3 feet wide) along the North-West pedestrian barrier on the Pescadero State Beach (Western) side.
- 40 square feet (8 feet long, 5 feet wide) would be cleared from the pedestrian pathway
- 190 square feet (62.5 feet long, 3 feet wide) along and under the North-West MBGR
- 312.5 square feet (62.5 feet long, 5 feet wide) along and under the North-East MBGR
- 205 square feet (410 feet long, 0.5 feet wide) along and under the South-West MBGR
- 312.5 square feet (62.5 feet long, 5 feet wide) along and under the South-East MBGR

The Project expects ground disturbance on Pescadero State Beach. Approximately 1800 cubic feet (66.6 cubic yards) of sand on the Pescadero State Beach side of the North-West pedestrian is expected to be removed for construction crew access to the barriers. The sand will be disposed of on Pescadero State Beach in coordination with State Parks staff.

The existing rails would be sawcut horizontally and removed. Workers using jackhammers and excavators would break the barriers down into manageable pieces, load them onto a truck and take them offsite. The barriers on the wingwalls would also be demolished. The top of the wingwalls would be sawcut to remove the barriers atop the wingwall. After the barriers are removed, they would be replaced.

Installing the new Type 85 barriers and the pedestrian rail would involve drilling and bonding dowels into the existing bridge deck overhang and wingwalls to anchor reinforcement bars. After reinforcement bars are placed, concrete would need to be poured for the Type 85 barriers. Wooden forms would be constructed around the reinforcement bars to provide a structure in which to pour the concrete. After the concrete has been poured and has hardened, the forms would be removed. The bridge deck would then be refinished within one foot of the new barriers throughout the length of the bridge.

The approach slabs would be repaired using methacrylate, a liquid chemical application. Workers would apply methacrylate to cracks and spalled areas, where it would quickly cure to a hardened material after seeping into holes.

Construction equipment would include, but not be limited to: an under-bridge inspection and utility truck, back hoes, excavators, cranes, paving machines,

dump trucks, jack hammers, saw cutters, generators, vacuums, water trucks, and street sweepers.

Construction is anticipated to begin in 2023 and take a total of 150 working days to complete. There would be no weekend work or full highway closures. Project Feature BIO-3: Bird Protection Measures includes a work window from October 1 to January 31 to avoid take of migratory birds during the bird nesting season (February 1 to September 30). Agency approved biologists would conduct preconstruction nesting bird surveys no more than three days prior to construction. If an active nest is discovered, the biologists would establish an appropriate exclusion buffer around the nest. The area within the buffer would be avoided until the young are no longer dependent on the adults or the nest is no longer active. If a nesting special-status bird species is discovered, an agency approved biologist would notify the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) for further guidance. Partially constructed and inactive nests would be removed to prevent occupation.

3. DESCRIPTION OF SECTION 4(F) RESOURCES

As part of this Section 4(f) evaluation, a 0.5-mile radius was developed around the Project site to determine if any Section 4(f) resources are located within the Project vicinity and if the proposed Project would “use” these properties. One public park is located within this 0.5-mile radius: Pescadero State Beach. The Pescadero Marsh Natural Preserve is part of Pescadero State Beach. Table 3-1 lists the Project location where construction activities are proposed within 0.5 mile of a park, and whether the work location would “use” the applicable Section 4(f) properties.

Table 3-1: Section 4(f) Resources Located within 0.5-Mile Radius of the Proposed Project and Preliminary Section 4(f) Impact Determination

Section 4(f) Resource and Agency with Jurisdiction	Location (post mile)	Type of Resource	Nature of Proposed Construction Activities	Dimension of “Use” (sq. ft.)	Anticipated Section 4(f) Impact
Pescadero State Beach - California Department of Parks and Recreation (DPR)	14.0	State Park, Wildlife Refuge	Replace bridge railing, remove vegetation and relocate sand	120' x 5' (600 square feet)	<i>De Minimis</i>

3.1 PARK/RECREATION RESOURCES

3.1.1 Pescadero State Beach

Pescadero State Beach is a State Beach intended for public recreation. Seventeen miles south of Half Moon Bay, Pescadero State Beach has a mile-long shoreline with sandy coves, rocky cliffs, tide pools, fishing spots, and picnic facilities. There are three public parking lots with access to the beach. East, across SR 1, is Pescadero Marsh Natural Preserve, a 235-acre wildlife refuge, popular with bird watchers and other naturalists. The preserve, a vital stopping point for migratory species along the Pacific Flyway, is a refuge for wildlife such as blue herons, kites, deer, raccoons, foxes, and skunks. The central parking lot, located immediately South-West of the Project site, also provides access to Pescadero Marsh Natural Preserve (State Parks, 2021).

4. IMPACTS ON SECTION 4(F) AND HISTORIC RESOURCES

4.1 PARK/RECREATION RESOURCES

4.1.1 Pescadero State Beach

Impact: Project construction activities would temporarily impact views of the Pacific Ocean and Pescadero State Beach from Pescadero Marsh Natural Preserve, Pescadero Creek Bridge, and surrounding areas. Pedestrian and cyclist access to Pescadero State Beach will continue during construction. Vegetation removal on Pescadero State Beach would temporarily impact natural resources and require a temporary construction easement (TCE).

Preliminary Use Determination: Based on the above, although a portion of park property would be required for a TCE from this protected resource, which constitutes permanent “use” under Section 4(f), the conclusion of this evaluation is a preliminary determination of *de minimis* impact for the proposed Project. The attributes and features of Pescadero State Beach, such as hiking, wildlife viewing, wildlife refuge, ocean overlooks, picnicking, camping, and beach access that qualify it for Section 4(f) protection would not be adversely impacted.

The TCE located at PM 14.0 would not incorporate property from this resource into the upgraded SR 1 transportation facility, would have temporary duration, and is minor in scope, and following construction, this site would be restored to its previous condition. Additionally, Caltrans plans to compensate DPR for a beach dune restoration project in place of vegetation mitigation for Project activities, improving protected resource conditions. Therefore, this evaluation results in a preliminary determination of *de minimis impact* for this temporary “use.”

4.1.2 Conclusion

In conclusion, implementation of the proposed Project includes one small encroachment onto portions of park land protected under Section 4(f), which constitute a “use” of the property. This “use” of Section 4(f) property would not result in any permanent impacts to recreational attributes or features of the park resources. The proposed Project would preserve the structural integrity of Pescadero Creek Bridge and SR 1 within the project corridor. In addition, the proposed Project would help maintain safe, uninterrupted access and connectivity for the public’s continued use of the public park evaluated in this document.

5. MEASURES TO MINIMIZE HARM TO SECTION 4(F) RESOURCES

Advanced planning was conducted, and appropriate measures have been incorporated into the proposed Project to minimize impacts to the Section 4(f) resource discussed above. The replacement of railing on Pescadero Creek Bridge on SR 1 in this coastal section of San Mateo County was designed to avoid any adverse impacts to the recreational facilities and parks in the Project vicinity.

The following Project Features (PFs) and Avoidance and Minimization Measures (AMMs) have been incorporated into the proposed Project.

5.1 PROJECT FEATURES

Project Feature AQ-1: Control Measures for Construction Emissions of Fugitive Dust. Dust control measures would be implemented to minimize airborne dust and soil particles generated from graded areas. For disturbed soil areas, the use of an organic tackifier to control dust emissions would be included in the construction contract. Watering guidelines would be established by the contractor and approved by the Caltrans resident engineer. Any material stockpiles would be watered, sprayed with tackifier, or covered to minimize dust production and wind erosion.

Project Feature AQ-2: Air Pollution Control. Caltrans Standard Specifications Section 14-9.02, Air Pollution Control, requires contractors to follow all air pollution control rules, regulations, ordinances, and statutes.

Project Feature BIO-1: Worker Environmental Awareness Training. Construction personnel will attend a mandatory environmental education program delivered by a qualified Caltrans biologist prior to taking part in site construction. The program will focus on the conservation measures that are relevant to an

employee's personal responsibility and will include an explanation as how to best avoid take of California red- legged frog and San Francisco garter snake. At a minimum, the training will include a description of species; how they might be encountered within the project area; their status and protection. A fact sheet conveying this information will be prepared and distributed to all construction and project personnel. Distributed materials will include cards with distinctive photographs of California red-legged frog and San Francisco garter snake, compliance reminders, and relevant contact information. Documentation of the training, including sign-in sheets, will be kept on file and made available to regulatory agencies upon request.

Project Feature BIO-2: Proper Use of Erosion Control Devices. To avoid entanglement or injury of susceptible, protected biological resources, erosion control materials that use plastic or synthetic monofilament netting will not be used during the Project's construction.

Project Feature BIO-3: Bird Protection Measures. To avoid take of migratory birds during the bird nesting season (February 1 to September 30): Agency approved biologists would conduct preconstruction nesting bird surveys no more than three days prior to construction, within a 300 feet buffer from the Project work area, and within a 500 feet buffer for raptors. If an active nest is discovered, the biologists would establish an appropriate exclusion buffer around the nest. An exclusion buffer of 300 feet would be established for any nest. An exclusion buffer of 500 feet would be established for a raptor nest. The area within the buffer would be avoided until the young are no longer dependent on the adults or the nest is no longer active. If a nesting special-status bird species is discovered, an agency approved biologist would notify the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) for further guidance. Partially constructed and inactive nests would be removed to prevent occupation.

Project Feature BIO-4: Vegetation Removal. *Vegetation removal of any kind is prohibited from any Project-related activities.*

Project Feature BIO-4 was removed from the Project due to a change to the existing environment in the Project footprint, requiring vegetation removal.

Project Feature BIO-5: Night Lighting. Artificial lighting during nighttime hours will be minimized to the maximum extent practicable. Lighting must be directed to illuminate the immediate work area only, while minimizing spillage into adjacent areas.

Project Feature BIO-6: Trash Control. Food and food related trash items would be secured in sealed trash containers and removed from the site at the end of each day.

Project Feature BIO-7: Pets. Pets would be prohibited from entering the Project limits.

Project Feature BIO-8: Firearms. Firearms would be prohibited within the Project limits except for those carried by authorized security personnel or local, state, or federal law enforcement.

Project Feature CULT-1: Stop Work Upon Discovery of Cultural Materials. If cultural materials are discovered during construction, all earth-moving activity within a sixty-foot radius would be halted until a Caltrans Professionally Qualified Staff (PQS) can assess the nature and significance of the find.

Project Feature CULT-2: Additional Actions if Cultural Materials Contain Human Remains. If Caltrans PQS determines that cultural materials contain human remains, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall stop in any area or nearby area suspected to overlie remains. Caltrans' OCRS would contact the San Mateo County Coroner. Pursuant to PRC Section 5097.98, if the remains are thought by the coroner to be Native American, the coroner would notify the Native American Heritage Commission, which would then notify the Most Likely Descendent. The Caltrans OCRS would work with the Most Likely Descendent on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

Project Feature GHG-1: Emissions Reduction. Caltrans Standard Specifications Section 7-1.02A and 7-1.02C, Emissions Reduction, require contractors to comply with all laws applicable to the Project and to certify they are aware of and would comply with all ARB emission reduction regulations.

Project Feature WQ-1: Water Quality BMPs. The potential for adverse effects to water quality will be avoided by implementing temporary and permanent BMPs outlined in Section 7-1.01G of the Caltrans Standard Specifications. Caltrans erosion control BMPs will be used to minimize any wind or water related erosion. The State Water Resources Control Board has issued a National Pollution Discharge Elimination System Statewide Storm Water Permit to Caltrans to regulate storm water and non-storm water discharges from Caltrans facilities. A Water Pollution Control Plan would be developed for the Project, as one is required for all projects that have less than one acre of soil disturbance.

Protective measures will be included in the contract, including, at a minimum:

- No discharge of pollutants from vehicle and equipment cleaning are allowed into the storm drain or water courses.
- Vehicle and equipment fueling and maintenance operations must be 50 feet away from water courses.
- Concrete wastes are collected in washouts and water from curing operations is collected and disposed of and not allowed into water courses.
- Dust control will be implemented, including use of water trucks and tackifiers to control dust in excavation and fill areas, rocking temporary access roads entrances and exits, and covering temporary stockpiles when weather conditions require.

Project Feature TRIBE-1: Protect Discovered Tribal Cultural Resources with Temporary Fencing. If any tribal cultural resources are found during construction, a Caltrans PQS archaeologist shall determine whether the resources can be avoided by the Project. If the resources can be avoided, the resources would be delineated on the ground with temporary fencing and avoided by construction. No construction-related activities or staging would be permitted within these areas.

5.2 AVOIDANCE AND MINIMIZATION MEASURES

AMM AES-1: Transparent Railing. Aesthetically pleasing high transparent bridge rails would be incorporated into the design of the Project, and this would be instrumental in minimizing visual impacts.

AMM AES-2: Erosion Control. All disturbed ground surfaces would be restored and treated with erosion control.

AMM BIO-1: Pre-construction Surveys. Pre-construction surveys for special-status species will be conducted by a qualified Caltrans biologist(s) no more than 20 calendar days prior to any ground disturbance. These efforts will consist of walking surveys of the project limits and, if possible, accessible adjacent areas within at least 50 feet of the project limits. The biologist(s) will investigate potential cover sites when it is feasible and safe to do so.

AMM BIO-2: Special-Status Species on Site. If a special-status species is observed within a construction zone, construction activities within a 50-foot radius of the animal will be suspended until the animal leaves the site voluntarily or an agency-approved protocol for removal has been established.

AMM BIO-3: Native Vegetation Removal Mitigation. To mitigate for native vegetation removal, Caltrans will enter into an interagency agreement with DPR

to pay for a DPR project to establish a native vegetation sand dune community on Pescadero State Beach.

AMM BIO-4: Plant and Wildlife Impact Avoidance. Caltrans will avoid and minimize impacts to plant and wildlife species in the Project work area to the extent feasible.

AMM BIO-5: Pre-construction Plant Survey. Pre-construction sensitive plant species surveys will be conducted by a qualified Caltrans biologist(s) during the blooming season from March 1 to July 30.

AMM BIO-6: Plant Seed Collection. If sensitive plant species are discovered during construction, all construction activity within a sixty-foot radius would be halted until a Caltrans Biologist can assess the nature and significance of the find and collect seeds if the plant is in the appropriate seed season. The collected seed will be stored in a regionally appropriate seed bank.

AMM TRANS-1: Develop a Traffic Management Plan. To offset temporary disruption during construction, a Traffic Management Plan (TMP) would be developed by Caltrans with input from the local community during the design phase. The TMP would include one-way traffic controls, flaggers, and construction phasing to reduce impacts to residents and maintain access for emergency services. Thus, police, fire, and medical services would not be adversely affected by the proposed Project. The TMP would also include coordination with San Mateo County and public notification in the event of an emergency. The TMP would also ensure access to residential driveways that are near construction activities. The TMP would have the added benefit of reducing construction GHG emissions by limiting traffic delays.

6 COORDINATION

Caltrans will continue to coordinate with DPR regarding the preliminary *de minimis* finding made in this document, as well as all advanced Project designs with respect to the affected park in San Mateo County. Prior to finalizing the *de minimis* impact finding made in this document, Caltrans will prepare a public notice and provide the public an opportunity to review and comment on the preliminary *de minimis* impact finding during a 30-day public review period.

Possible methods of public involvement include, but are not limited to, newspaper advertisements, notices posted on bulletin boards, and project websites.

The Draft Initial Study with Proposed Negative Declaration was circulated to the public for 30 days beginning on September 2, 2020 and ending on October 1,

2020. In addition, the Final environmental document is electronically accessible on the Caltrans website:
<https://dot.ca.gov/caltrans-near-me/district-4/d4-popular-links/d4-environmental-docs>

Caltrans District 4, OCRS technical studies were conducted by Caltrans PQS and carried out in a manner consistent with Caltrans responsibilities under the January 2014 First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal Aid Highway Program in California.

Caltrans contacted the Native American Heritage Commission (NAHC) on April 30, 2019, requesting a review of their scared lands file for any historically significant resources within or near the Project area. No Native American cultural resources were identified through this search. The NAHC provided a list of interested Native American individuals and organizations for further consultation. Letters and emails requesting input along with a Project area map were sent to each of the listed parties on May 3, 2019. Follow-up phone calls were made May 3rd and 30th, 2020.

Chairperson Irene Zwierlein, Amah Mutsun Tribal Band of Mission San Juan Bautista, suggested that all Project personnel be trained in cultural sensitivity matters. Detailed voicemail messages were left for Chairperson Patrick Orozoco of the Costanoan Ohlone Rumsen-Mutsun Tribe and Chairperson Valentin Lopez of the Amah Mutsun Tribal Band. Chairperson Tony Cerda's, of the Costanoan Rumsen Carmel Tribe, telephone was disconnected. The voicemail box of Charlene Nijmeh, Chairperson of the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, was full. Andrew Galvan of the Ohlone Indian Tribe requested, via email, copies of any reports completed for this Project. Ann Marie Sayers, Chairperson of the Indian Canyon Mutsun Band of Costanoan, was not reached by phone. No further responses have been received at the time of this writing.

7. LIST OF TECHNICAL STUDIES AND REFERENCES

California Department of Parks and Recreation (State Parks). 2021. Pescadero State Beach. Webpage. https://www.parks.ca.gov/?page_id=522

California Department of Transportation (Caltrans). 2017. Construction Site Best Management Practices (BMP) Manual. CTSW-RT-17-314.18.1. May. Division of Environmental Analysis, Stormwater Program.

_____. 2019. Section 106 Review for the Pescadero Creek Bridge Rails Project in San Mateo County, California. Technical Memorandum. File 04-SM-1. EA 04-4J870. District 4 Office of Cultural Resources Studies. Oakland, CA. September 30.

Coastside State Parks Association. 2021. Pescadero Marsh Natural Reserve. Webpage. <https://www.coastsidestateparks.org/pescadero-marsh-natural-preserve>

Federal Highway Administration (FHWA). 1987. FHWA Technical Advisory T6640.8A. October 30.

_____. 2012. Revised FHWA Section 4(f) Policy Paper. July 20.