CalVTP Project-Specific Analysis and Addendum to the PEIR for the Town of Los Gatos Open Space Vegetation Management Plan, Santa Clara County, California

AUGUST 2023

PREPARED FOR

Town of Los Gatos

PREPARED BY

SWCA Environmental Consultants

ATTACHMENT 3

CALVTP PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE PEIR FOR THE TOWN OF LOS GATOS OPEN SPACE VEGETATION MANAGEMENT PLAN, SANTA CLARA COUNTY, CALIFORNIA

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Acronyms and Abbreviations

ABAG	Association of Bay Area Governments
ACM	asbestos-containing material
AMMs	Avoidance and Minimization Measures
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
Cal-IPC	California Invasive Plant Council
Cal/OSHA	California Division of Occupational Health and Safety Administration
CalEPA	California Environmental Protection Agency
CAL FIRE	California Board of Forestry and Fire Protection
Caltrans	California Department of Transportation
CalVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
CHRIS	California Historical Resources Information System
CHSC	California Health and Safety Code
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
County	County of Santa Clara
CWPP	Community Wildlife Protection Plan
dbh	diameter at breast height
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
GHG	greenhouse gas
HCP	Habitat Conservation Plan
HWCA	Hazardous Waste Control Act
LOS	level of service
LRA	Local Responsibility Area
Midpen	Midpeninsula Regional Open Space District
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program

NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOx	nitrogen oxides
NWI	National Wetlands Inventory
NWIC	Northwest Information Center
OPR	California Governor's Office of Planning and Research
PEIR	Program Environmental Impact Report
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_{10}	particulate matter less than 10 microns in diameter
PRC	Public Resources Code
proposed project	Town of Los Gatos Undeveloped Parks and Open Space Areas Vegetation Management Plan
PSA	Project-Specific Analysis
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SCS	Sustainable Communities Strategy
SENL	single event [impulsive] noise level
SO_2	sulfur dioxide
SPR	Standard Project Requirement
SR	State Route
SRA	State Responsibility Area
Town	Town of Los Gatos
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMP	Vegetation Management Plan
VMT	vehicle miles traveled
WUI	wildland-urban interface

1 PROJECT OVERVIEW

The California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area (SRA) in California (CAL FIRE 2019a). It was designed for use by many state and local agencies and special districts to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR.

The Town of Los Gatos (Town) proposes to implement a Vegetation Management Plan (VMP) throughout its Town-owned and maintained undeveloped parks and open space areas within the Very High Fire Hazard Severity Zone (VHFHSZ) (Figure 1; Town of Los Gatos 2019b). The Town is seeking California Environmental Quality Act (CEQA) compliance for the *Town of Los Gatos Undeveloped Parks and Open Space Areas Vegetation Management Plan* (proposed project) through preparation of this CalVTP Project-Specific Analysis (PSA) and addendum to the PEIR.[1]

1.1 CEQA Lead Agency and Proposed Project

Serving as the Lead Agency under CEQA, the Town proposes to implement fuel reduction treatments on approximately 193.91 acres within Local Responsibility Areas (LRAs) in the Town of Los Gatos, Santa Clara County, California (see Figure 1). The Town is seeking CEQA compliance for the proposed project as a later activity covered by the PEIR using its PSA checklist. The proposed treatment types (i.e., wildland-urban interface [WUI] fuel reduction and fuelbreaks) and the treatment activities (i.e., manual treatments, mechanical treatments, prescribed herbivory, and chemical treatments) are consistent with those evaluated in the PEIR. Ongoing maintenance of the proposed vegetation treatments would involve the same treatment activities as the original treatments (i.e., manual treatments, mechanical treatments, prescribed herbivory, and chemical treatments). The treatment areas are partially outside the CalVTP treatable landscape.

1.2 Purpose of this Document

This document serves as the PSA to evaluate whether the proposed project is within the scope of the PEIR. As described above, the treatment types and activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with State CEQA Guidelines Section 15168(c)(2).

The majority of the proposed project treatment areas extend outside of the CalVTP treatable landscape within an LRA. Portions of the Santa Rosa and Heintz Open Spaces are within the treatable landscape, but the remainder of the open spaces and three Town parks are scattered throughout the Town and are outside of the treatable landscape. However, the southern and southwestern border of the Town are adjacent to the CalVTP treatable landscape and there are scattered polygons of treatable landscape through the southern and southeastern parts of the Town.

[1] The roadway portions of the VMP project qualified for a CEQA Statutory Exemption under Article 18, Section 15269(c) - Emergency Projects exemption. Article 18, Section 15269(b) addresses emergency repairs necessary to maintain services essential to public health, safety, or welfare. These emergency repairs include those that require a reasonable amount of planning to address an anticipated emergency. Article 18, Section 15269(c) applies to specific actions necessary to mitigate an emergency, including "activities such as fire or catastrophic risk mitigation or modifications to improve facility integrity."

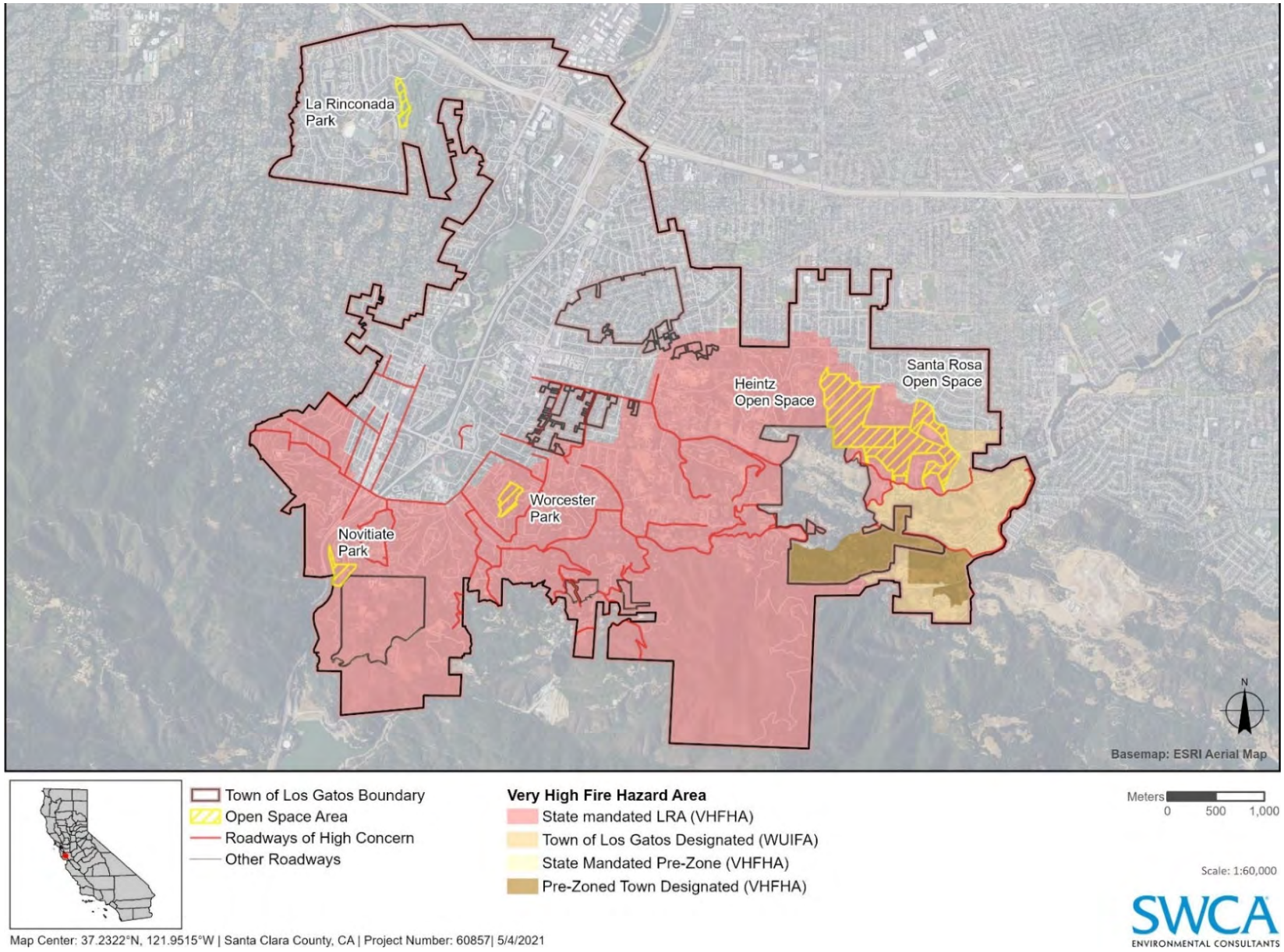

Figure 1. Proposed VMP Project Treatment Areas.

If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the treatable landscape, the environmental analysis in the PEIR would be applicable.

An Addendum to an Environmental Impact Report (EIR) is appropriate when a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there is a proposed revision to or change in the project, compared to the PEIR, which is the inclusion of areas outside of the CalVTP treatable landscape. The PSA checklist (refer to Section 4, *Project-Specific Analysis/Addendum*) includes the criteria to support an Addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR.

This document serves as both a PSA and an Addendum to the CalVTP PEIR to provide CEQA compliance for the proposed vegetation treatments within and outside of the treatable landscape. The Project-Specific Mitigation Monitoring and Reporting Program (MMRP), which identifies the CalVTP Standard Project Requirements (SPRs) and Mitigation Measures (MMs) applicable to the proposed project, is presented in Appendix A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

2 PROJECT DESCRIPTION

2.1 Project Background

The Town houses a complex wildfire environment (e.g., narrow, winding roads; combustible vegetation) that presents a significant risk to both residents and firefighters. The Town is included as a community at risk from wildfires on the federal and California Fire Alliance list of communities at risk in Santa Clara County (California Board of Forestry and Fire Protection [CAL FIRE] 2020).

The Town WUI planning area includes approximately 4,740 acres of primarily VHFHSZ areas, as defined by CAL FIRE and the Town Fire Prevention and Protection Ordinance (CAL FIRE 2007 Town of Los Gatos 1996, 2019a, 2020a). Approximately a quarter of the Town's residences are located within the WUI. Of an estimated 2018 total of 13,299 residences, the WUI contains approximately 3,091 (Town of Los Gatos 2022a). A Community Wildfire Protection Plan (CWPP) was prepared for the County of Santa Clara (County) in 2016 (County of Santa Clara 2016). The Town of Los Gatos Annex (Annex 9) of the CWPP addressed specific wildfire prevention and mitigation needs for the Town and identified the need for the following that pertain to the Town's parks and open spaces:

- Community outreach and prioritizing treatments along existing trails that could help to provide a more substantial fuel break and break up the continuity of fuels (Strategic Goal FR-1).
- Prioritize treatments along existing trails to provide fuel breaks and break up continuity of fuels (Strategic Goal FR-1).
- Establish maintenance program in WUI areas where fire behavior and evacuation timing are problematic (Strategic Goal FC-2; County of Santa Clara 2019).

The VMP was prepared to address those needs and outlines a strategy for managing fuel loads and vegetation along roadways in the Town's VHFHSZ (Phase 1) and on Town-owned open space lands/undeveloped parks (Phase 2). Phase 1 of the VMP, which included vegetation management along roadways, was determined to be exempt from CEQA and is not considered in this PSA. This PSA will include Phase 2 of the VMP, which includes vegetation management in Town-owned open space lands and undeveloped parks.

The goal of the Open Space VMP is to manage vegetation and create fuel breaks along trails in the Town-owned open space/undeveloped park lands through modification of vegetation to reduce crown overlap and ignition points with overhead powerlines, reduce ladder fuels and combustible surface fuels, enhance and maintain trails for efficient and effective evacuations, and create defensible space for fighting fires. Vegetation management in the Town will provide defensible space around structures and assets where these zones extend onto Town open space/undeveloped parks and create strategic fuel breaks to decrease intensity and duration of fires reducing their ability to accelerate and spread.

The VMP includes fire management strategies to reduce the potential for catastrophic wildfires to occur within the Town. The goals, objectives, and recommendations identified in the VMP are based on existing field conditions and accepted CAL FIRE, County, and Town vegetation management guidelines for wildfire hazard reduction (CAL FIRE 2019b; Town of Los Gatos 2020a). This VMP also identifies best management practices (BMPs) to be implemented during vegetation management activities to reduce or avoid impacts to the Town's valuable natural resources and maintain important wildlife habitat.

2.2 Purpose and Need

The overarching purpose of the Open Space VMP is to provide a framework for reducing and managing vegetative fuel loads on Town-owned open spaces/undeveloped parks within the Town's VHFHSZ to minimize wildfire hazard while avoiding or minimizing negative environmental effects. The Open Space VMP follows the vegetation management treatments for reducing wildfire hazard described in the CalVTP.

The Open Space VMP identifies and prioritizes fuel reduction treatments to remove hazardous vegetation from 193.91 acres of Town-owned open space lands and undeveloped parks, including the Santa Rosa and Heintz Open Spaces and La Rinconada, Novitiate, and Worcester Parks (see Figure 1). The Open Space VMP also discusses fire safety of land uses bordering the Town's undeveloped parks and open space areas and identifies recommended measures that private landowners can take to reduce wildfire risk and ignition potential throughout the VMP Area.

The Town will avoid and minimize potential negative environmental effects of vegetation management to the greatest extent feasible, but also acknowledges that vegetation management is essential to public safety and that environmental impacts of a catastrophic wildfire and post-fire effects within the Town could greatly exceed the impacts of routine maintenance activities.

2.3 Project Activities

2.3.1 *Project Area*

The proposed project consists of fuel reduction treatments over approximately 193.91 acres within five Town-owned and managed open space and undeveloped park areas (Town of Los Gatos 2008), including

two open space areas and three undeveloped parks within the VHFHSZ.[2] These parks and open spaces are also adjacent to WUI areas that are identified as VHFHSZ (Association of Bay Area Governments [ABAG] 2019).[3]

SANTA ROSA OPEN SPACE

The Santa Rosa Open Space area is located on approximately 76 acres of Town-owned land on the east side of the Town adjacent to and east of Heintz Open Space. Its northern boundary is adjacent to WUI lands that are also VHFHSZ, and its southern and eastern boundaries are adjacent to scattered WUI areas, some of which are also VHFHSZ. The Santa Rosa Open Space has a canopy primarily composed of oak woodland forest, including valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), and California buckeye (*Aesculus californica*), with an understory dominated by non-native annual grasslands, including slender oat (*Avena barbata*), and California natives, including coyote brush (*Baccharis pilularis*), poison oak (*Toxicodendron diversilobum*), California sage (*Artemisia californica*), elderberry (*Sambucus nigra*), California rose (*Rosa californica*), and snowberry (*Symphoricarpos albus*). Dominant invasive species include Italian thistle (*Carduus pycnocephalus*), star thistle (*Centaurea solstitialis*), stinkwort (*Dittrichia graveolens*), and cotoneaster. Several eucalyptus (*Eucalyptus* spp.) trees and ornamental tree species were observed adjacent to the Santa Rosa Open Space. There are areas of canopy connectivity across fire roads, mostly composed of oaks, areas with dense understories, and areas of minor powerline entanglement. Woody slash and debris were observed stockpiled in concentrated areas. These woody slash and debris areas are currently periodically removed but may also be chipped and left in place as part of the Open Space VMP.

HEINTZ OPEN SPACE

The Heintz Open Space is located on approximately 88 acres of Town-owned land near the Summerhill Homes development in the Heritage Grove neighborhood in the Town. The Heintz Open Space connects to the Shannon Valley Open Space, Belgatos Park, and Santa Rosa Open Space. Similar to the Santa Rosa Open Space, its northern border is comprised of WUI lands that are also VHFHSZ. Its southern and western borders are adjacent to scattered WUI lands. The Heintz Open Space is dominated by oak woodland and California buckeye. Vegetation is overall consistent with the Santa Rosa Open Space, as described above. Areas of canopy connectivity occur within this open space and will require maintenance for fire truck access.

LA RINCONADA PARK

La Rinconada Park is an approximately 9-acre forested creekside park located at 151 Granada Way. It includes a 4-mile trail along Smith Creek, an unlit tennis court, a playground, and picnic areas. La Rinconada Country Club golf course is located adjacent to La Rinconada Park along the park's eastern boundary near Smith Creek. Residential properties are located to the west of the park along Granada Way. The nearest WUI, which includes some VHFHSZ, is 0.3 mile south and connected by the Smith Creek riparian corridor. Valley oak and coast live oak dominate along the riparian area, which bisects the park. The understory is sparse and contains invasive species, including English ivy (*Hedera helix*), French broom (*Genista monspessulana*), acacia, and privet near the southern park boundary. Large patches of ivy are dominant at the northern boundary adjacent to the public tennis courts (Town of Los Gatos 2020c).

[2] La Rinconada Park is not within the VHFHSZ; however, it is included because it contains an area of mature trees and dense vegetation in close proximity to a residential area.

[3] La Rinconada Park is 0.3 mile north of the nearest WUI area, however, the intervening land includes a creek with continuous riparian vegetation. Such watercourses are capable of providing a conduit for wildfire (North 2012).

NOVITIATE PARK

Novitiate Park is located at 300 Jones Road and includes approximately 10 acres of former vineyard, now minimally developed with trails and coast live oak woodland. It is a gateway to the Midpeninsula Regional Open Space District (Midpen) St. Joseph Hill Open Space and is surrounded by WUI lands that are also VHFHSZ. Los Gatos Creek borders the western boundary of Novitiate Park and is dominated by California bay (*Umbellularia californica*), coast live oak, and sycamore. A dense understory of French broom along the eastern park boundary and an infestation of Italian thistle along the northern park boundary are present within this park. Coast live oak savannah and non-native annual grassland are consistent throughout the area with elderberry and poison oak interspersed towards the center of the park. Excess woody debris and slash occupy areas of the understory in northern and western portions of the park (Town of Los Gatos 2020c).

WORCESTER PARK

Worcester Park is located at 140 Worcester Loop. It consists of approximately 11 acres of oak woodland with three trails and is surrounded on all sides by residences that are located in the WUI and VHFHSZ (ABAG 2019). Worcester Park is dominated primarily by coast live oak woodland. A dense understory composed of French broom, olive (*Olea europaea*), elderberry, ivy, Italian thistle, tree of heaven (*Ailanthus altissima*), and woody debris is interspersed. A small irrigation-fed seep with hydrophytic vegetation, including nut sedge (*Cyperus eragrostis*), occurs on the western park boundary. Sparse areas of ivy, vinca (*Vinca major*), and acacia occur throughout the park and may require management to prevent future infestations. Dense mats of English ivy and broom are growing along the fence on the western edge of the park in the understory and will require management (Town of Los Gatos 2020c).

2.3.2 *Treatment Type: Wildland-Urban Interface Fuel Reduction*

The proposed project includes fuel reduction activities within LRA areas that are adjacent to WUI areas in the Town. Strategic fuel reduction activities would be conducted to reduce dead and dying trees and understory brush that pose a threat of wildfire to nearby neighborhoods within the proposed treatment areas. This proposed treatment type is consistent with the PEIR for modifications of landscape to reduce losses and improve resiliency to wildfire (SWCA Environmental Consultants [SWCA] 2020).

The focus of WUI fuel reduction treatments is to strategically reduce vegetation density and remove fuel to directly protect communities from wildfires originating in adjacent open space areas and protect open space areas from wildfire starting in or near development. These treatments also serve as emergency access points and staging areas for firefighters and equipment. WUI fuel reduction would also address areas where habitat is degraded by infestation of non-native plant species and in need of fuel reduction. Activities implemented within the WUI fuel reduction treatment type would occur within the 100-foot defensible space requirements on Town-owned open space, as well as within the open space areas and undeveloped parks, to reduce the overall risk of ignition and slow the rate of wildfire if it occurs within the Town. Proposed treatment activities include removing hazardous trees, thinning understory trees and brush, reducing ladder fuels, and removing fuels along trails throughout proposed treatment areas to reduce potential wildfire fuels within and adjacent to the WUI. Appendix B identifies the specific areas where WUI fuel reduction (i.e., defensible space and fuel reduction area treatments) and non-native species removal will occur within the Open Space VMP Area.

2.3.3 *Treatment Type: Fuel Break*

There are two types of fuel break treatment types: non-shaded fuel breaks and shaded fuel breaks. Non-shaded fuel breaks are typically created where there is a natural change in vegetation type, such as from

forest to grassland. Heavy equipment is typically used to remove all vegetation from this type of fuel break, although manual removal or prescribed burning may be used on slopes steeper than 50% to 60%. Shaded fuel breaks are used in forest settings. The tree canopy is thinned to reduce the potential for crown fire to move through the canopy, but large trees remain. The shade of the retained canopy helps reduce regrowth of shrubs and sprouting hardwoods. Shaded fuel breaks are used instead of non-shaded fuel breaks in areas where habitat needs to be retained for sensitive species, there is potential for erosion, there is potential for visual impacts, or the fuel type allows this type of treatment. The proposed project would create shaded fuel breaks that will be 100-feet wide and will be located along open space/undeveloped park boundaries, and along fire roads and trails. Appendix B identifies the specific areas where fuel breaks will occur within the Open Space VMP Area.

2.3.4 *Treatment Activities*

As described in Table 1, proposed treatment activities include mechanical thinning, mechanical mowing, manual thinning, prescribed herbivory, and herbicide application over approximately 193.91 acres of proposed treatment areas within the Town. Each of these activities are included as vegetation treatments in the PEIR and are described in detail below.

Table 1. Proposed VMP Treatments and CalVTP Treatment Types

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments	Timing of CalVTP Treatments
WUI Fuel Reduction/ Fuel Break	Use of motorized equipment to grade, mow, disk, cut, masticate, and grub existing vegetation to reduce fuel loads within the WUI, including in the Defensible Space areas or create zone of vegetation removal that support fire suppression.	Mechanical Treatment	Up to 194 acres	Bobcats, chippers, tractors, masticators, skid steers, dozers, and mowers	Mechanical treatment may be conducted year-round. Nesting bird Avoidance and Minimization Measures (AMMs) would apply March through August.
	Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species to avoid impacts to sensitive habitats while reducing fuel loads within the WUI.	Manual Treatment	Up to 194 acres	Shovels, wrenches, chainsaws, handsaws, pruning shears, trimmers, weed whackers, and loppers	Manual treatment may be conducted year round depending on the growth patterns of the species. Nesting bird AMMs would apply March through August.
	Use of livestock to consume grasses forbs and emerging shrubs and trees, to reduce understory and herbaceous fuel loads.	Prescribed Herbivory	Up to 137 acres	Livestock, such as cattle, goats, sheep, or horses	Prescribed herbivory would be conducted year round, but primarily in late spring through late summer.
	Herbicide application is typically performed by hand and can include sponging, spraying (e.g., backpack hand applicator, boom sprayers), hand placement of pellets, or dusting chemicals onto targeted vegetation. Herbicide application would be used for invasive species removal.	Herbicide Treatment	Up to 10 acres	Backpack hand applicator, boom sprayers	Chemical applications may be conducted January through September, depending on the invasive species growth patterns.
Total Project Acres			**193.91 acres***		

Source: SWCA (2021); CAL FIRE (2019c, Town of Los Gatos (2020c)

* Please note that more than one treatment may be applied at each location; therefore, the total acreage of treatments exceeds the total acreage in the project area.

MECHANICAL VEGETATION TREATMENT

Mechanical treatments involve the use of heavy machinery or equipment rather than hand or manual equipment to remove or alter vegetation and woody debris. Generally, this treatment option is used to create fire roads and/or breaks. Grading, mowing, disking, cutting, masticating, and grubbing are all examples of mechanical treatments. Mechanical treatments can be used on all vegetation types; however, access for machinery needs to be considered (e.g., slope, terrain, vegetation, seedbed preparation and revegetation needs, climate conditions, soil) before implementing this treatment type. Some areas may require more than one type of machinery to operate at once. For example, one machine may be cutting or removing vegetation and placing it in a stockpile for another machine to then chip in place or haul off-site. Vegetation removed during mechanical treatment would be disposed of by one or a combination of the following methods: lopping debris to a specified maximum length and scattering it within the treatment boundary to a specified depth to reduce flame lengths in the event of a wildfire, piling and leaving piles for wildlife habitat, chipping and blowing chips onto the ground as mulch or into piles for later removal, cutting large woody material into lengths for firewood, removing large wood material by hand, or hauling off-site to an appropriate facility.

This treatment option works best in areas with one uniform vegetation type. Operators of heavy machinery and equipment do not have the same ability as hand removal treatments to selectively remove species. However, it is possible with guidance for machinery to navigate around sensitive areas. Operators should be specifically trained to operate heavy machinery and supervised while conducting vegetation removal to limit impacts. Examples of heavy machinery and equipment include bobcats, chippers, tractors, and mowers. Mechanical treatments require ongoing monitoring and maintenance since residual weed or shrub seed in the soil or resprouting of shrubs may revegetate treated areas with undesired plants. Most mechanical treatment occurs in late spring, summer, or fall.

MANUAL VEGETATION TREATMENT

Manual treatment involves the use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or wood species. Hand removal is an effective but labor-intensive treatment option. Activities include hand pulling, trimming, pruning, cutting, and removal of trees, shrubs, or dead vegetation using only your hands or handheld equipment. Hand tools, including shovels, wrenches, chainsaws, handsaws, pruning shears, trimmers, weed whackers, and loppers, are used to trim and remove vegetation. This treatment requires less ground disturbance than mechanical treatment. Hand removal is a good treatment technique in areas with a vegetation mosaic, meaning multiple vegetation types in one area, where removal needs to be more selective. Solarizing and mulch application can also be placed on top of vegetation to reduce or stop growth through a combination of heat and lack of sunlight. These methods can take anywhere between 2 weeks and 6 months to treat vegetation, depending on the type and size of the vegetation and the treatment area size. This treatment option is most effective for spot treatments, not for widespread infestations. Vegetation that accumulates during manual treatments would be disposed of as described above for mechanical treatments.

PRESCRIBED HERBIVORY

Grazing or prescribed herbivory involves using livestock, such as cattle, goats, sheep, or horses, to reduce understory and herbaceous fuel loads. Livestock consume grasses, forbs, and emerging trees and shrubs that contribute to the overall hazardous fuel load. Livestock do not effectively create fuel breaks; this treatment should be used to maintain vegetative growth to reduce fuel loads in grasslands, in brushlands, and beneath tree canopies. Livestock can also be used to remove non-native species infestations.

Grazing typically occurs late in spring when certain vegetation growth starts to slow and continues through the late summer. Some livestock are better suited to specific habitat and terrain types. For the

open space areas/undeveloped parks, goats are the recommended livestock choice due to their ability to traverse a diverse range of terrains; consume large areas of vegetation including woody shrubs, vines, and trees over a short time-period; and remove materials up to 6 feet above the ground.

It is important that livestock are managed and remain only in designated grazing areas, which may require a herder, fencing, mineral block, and/or watering site. A site-specific grazing management plan should be prepared and implemented by a qualified contractor to prevent grazing or disturbance of sensitive resources. This grazing plan should clearly identify livestock containment methods such as portable or fixed fencing and/or herders, as well as timing of grazing activities, and movement of grazing animals to new locations. A target vegetation removal goal should also be identified in the grazing management plan to determine the amount of vegetation (usually expressed in pounds per acre) to prevent overgrazing. Grazing does not need to occur on an annual basis for hazardous fuel reduction if the goal is to simply maintain fuel load in a specific area. If the goal is to reduce fuels, then grazing should occur on an annual basis and can be adjusted as needed. Consultation with a Certified Rangeland Manager is advised when conducting prescribed herbivory.

HERBICIDE

Herbicides are chemicals that damage or kill plants, and can be classified by their mode of action, that interfere with plant metabolism in different ways. Herbicides include growth regulators, amino acid inhibitors, grass meristem destroyers, cell membrane destroyers, root and shoot inhibitors, and amino acid derivatives. Herbicide treatments are also either selective (i.e., they kill only a specific type of plant) or non-selective (i.e., they kill any type of plant). There are multiple factors to consider before applying herbicide treatments. These factors include the type or species of plant and the life stage, size, density, and location of the species. Herbicide treatments are only suited for specific vegetation types and densities. For example, larger species in low densities that are more difficult to remove, such as eucalyptus, could be treated with herbicides as secondary spot treatments while broom species that generally occur in high densities should be removed using hand tools, such as a broom wrench. Application of herbicide treatments directly on plant tissues is one of the most effective methods. All herbicide treatments must be conducted from the ground and no aerial applications would be allowed as part of this VMP. Herbicide application is typically performed by hand and can include sponging, spraying (e.g., backpack hand applicator, boom sprayers), hand placement of pellets, or dusting chemicals onto targeted vegetation.

Herbicide treatments are optional as part of the Open Space VMP, on an as-needed basis, but are not to be used in areas with sensitive biological resources, including riparian habitat. Consistent with the CalVTP, the Open Space VMP would allow for the use of the following herbicides in the open space/undeveloped parks areas: borax (tetraborate decahydrate), clopyralid (monethanolamine salt), glyphosate (ispropylamine salt, potassium salt, dimethylamine salt, diammonium salt), hexazinone, imazapyr (isopropylamine salt), sulfometron methyl, triclopyr (butoxyethyl ester and triethylamine salt), nonylphenol 9 ethoxylates (NP9E), cleantraxx (penoxsulam and oxyfluorfen), velpar (hexazinone), and indaziflam.

Herbicide treatments can be highly effective in reducing the number of live species but require extra measures, such as training and certification to handle chemicals/pesticides, equipment, and storage. Certification is required to apply herbicides in the State of California through the California Department of Pesticide Regulation and requires the certified party to obtain appropriate personal protective equipment (PPE), including, but not limited to, masks or respirators, safety goggles, gloves, protective clothing, hard hats, and boots. In addition, after herbicide application, dead species still need to be removed so that dry woody debris does not add to fuel loads. Herbicide treatments require ongoing monitoring and maintenance. Herbicide treatments must be performed in accordance with federal and state regulations by a licensed Pest Control Advisor.

2.3.5 *Vegetation Management and Maintenance Standards and Areas*

Vegetation management for wildfire hazard reduction is an ongoing, cyclical process. Given the dynamic nature of vegetation, a single management prescription cannot be assigned to any location and be effective in perpetuity. Additionally, management prescriptions intended for initial treatments may differ from those intended for future maintenance of the same area. As a result, the management and maintenance standards presented in this section have been broken down by specific vegetation types known to occur within the overall Open Space VMP Area. In addition, certain vegetation community/land cover types found in the Open Space VMP Area (i.e., urban) do not present a wildfire hazard due to noncombustible condition and are not included in the VMP.

Vegetation management treatments outlined in the previous section will be selected based on the needs of each Open Space VMP location as conditions change over time. The management and maintenance standards outlined in this section are intended to modify fuel arrangements to reduce the potential for ignitions, rapid fire spread, crown fires, and extreme fire behavior in accordance with state and local regulations. These standards have ultimately been developed to reduce fuel loads, eliminate ladder fuels, disrupt the horizontal continuity of vegetation, remove non-native species, minimize ignition potential, and prioritize retention of non-combustible plants.

The Town will work with private contractors annually to inspect and clear vegetation (as needed) within the Town-owned open space and undeveloped park areas. Clearing activities in these areas will include the following management standards:

- Establish a defensible space zone around buildings on adjacent private properties. The Town will remove or treat vegetation on identified Town-owned property within 100 feet of adjacent buildings to create a 100-foot defensible space perimeter. The Town will not remove or treat any vegetation on private property.
- Within 30 feet of a habitable structure on Town-owned properties, grasses (annual or perennial), weeds, and thistles will be treated such that heights do not exceed 3 inches. Grasses will not be pulled from the ground to avoid soil erosion. [4]
- Beyond 30 feet of a habitable structure, grasses (annual or perennial), weeds, and thistles will be treated such that heights do not exceed 18 inches.
- All dead trees and dead or dying ground cover, brush/scrub, twigs, branches, limbs, vines, or other vegetation will be removed from within the 100-foot defensible space area.
- Dead trees will strategically be removed from open spaces areas outside the 100-foot defensible space area within the areas identified as fuel reduction area and shaded fuel break.
- Dead or dying growth will be strategically removed from brush/scrub and trees from open space areas outside the 100-foot defensible space area within the areas identified as fuel reduction area and shaded fuel break.
- Dead or dying ground cover, woody slash and debris, brush/scrub, twigs, branches, limbs, vines, or other vegetation will strategically be removed from open space areas outside the 100-foot defensible space area within the areas identified as fuel reduction area and shaded fuel break. Alternatively, any removed wood could be chipped and spread on-site as mulch.
- Areas within the shaded fuel break and fuel reduction areas will be thinned by removing trees and shrubs or chipping them and spreading them on-site as mulch. Treatments for these areas should

[4] Cut grass may be left on the ground surface to protect soil as long as it does not exceed 6 inches in height.

follow standards discussed in *Standards for Vegetation Communities within the VMP Area*, for the appropriate vegetation community.

- Non-native/invasive species will be removed and hauled off site. Treatments within these areas should follow standards for invasive species discussed in *Standards for Vegetation Communities within the VMP Area*.
- Eucalyptus and acacia trees will be removed.

Areas where defensible space, fuel reduction areas, shaded fuel breaks, mowing/grazing, and invasive species are proposed to be implemented within each Open Space VMP location is included in Appendix B.

STANDARDS FOR VEGETATION COMMUNITIES WITHIN THE VMP AREA

The following section describes specific treatment standards for vegetative fuels present within the Open Space VMP Area. All vegetation removed from Open Space VMP management areas should be chipped in place and spread as mulch or transported and disposed of in accordance with Town codes and standards. All treatment activities will follow the appropriate recommendations for fuel reduction according to vegetation type within the open space/undeveloped park areas, consistent with CalVTP and CAL FIRE recommendations. Avoidance and Minimization Measures (AMMs) and BMPs are listed in Section 2.3.7 *Avoidance and Minimization Implementation*. In addition, the proposed project would implement applicable CalVTP SPRs, which are further described in the individual resources sections included in Section 4, *Project-Specific Analysis*.

Grassland/Herbaceous

Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP Area. Recommendations for grassland/herbaceous areas follow:

- In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat.
- Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris.
- Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion.
- Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.

Chaparral/Scrub

Chaparral, scrub, and brush occur throughout the VMP Area and include species like California sage scrub and coyote brush. This vegetation type generally occurs in dense clusters with some tree species interspersed. Recommendations for chaparral/scrub areas follow:

- Dead and dying debris should be cut and trimmed or removed. Roots can be left in place in order to maintain soil stability if necessary.

- All vegetative debris should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris.
- If trees are growing among this community, a minimum distance of three times the height of the scrub should be cleared between the lowest lying branches and the chaparral/scrub species.
- Horizontal separation should be two to three times the height of the chaparral/scrub.

Oak Woodland

Oak woodland dominates the Open Space VMP Area and includes a combination of coast live oak, valley oak, California bay, California buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined below in Section 2.3.7 *Avoidance and Minimization Implementation*. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy, understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow:

- In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches. In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained.
- Duff and leaf litter should not exceed 3 feet above ground level.
- If highly flammable species are present in oak woodland habitat, they should be removed and hauled off-site.
- Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20% of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).

Acacia, Eucalyptus, and Privet

Acacia, eucalyptus, and privet are highly invasive and highly flammable species that contain flammable resins and oils. These species occurs throughout the Open Space VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for areas with acacia, eucalyptus, and privet follow:

- Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees.
- Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps.
- A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest-lying branches and any scrub species.
- Cut and treat larger sapling and mature tree species with herbicides.
- Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 2.3.7 *Avoidance and Minimization Implementation* below.
- Acacia, eucalyptus, and privet can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.

Tree of Heaven

Tree of heaven is a highly invasive and flammable species that is commonly found in disturbed areas and along riparian corridors within the Open Space VMP Area. Recommendations for tree of heaven areas follow:

- Pull seedlings and small saplings while soils are moist and loose. Remove taproots by digging around the base of the plant to remove all roots and prevent resprouts.
- Cut the stems of mature trees at the beginning of spring and once more in June or July to reduce seed production and deplete energy reserves.
- Cut and treat trunks or stems of large trees (i.e., greater than 4 inches diameter at breast height [dbh]) with chainsaws and apply herbicides.

Broom Species

Broom is common in Open Space VMP Area understories and can grow in grasslands, scrub, and woodland habitats. Recommendations for broom species areas follow:

- Pull shrubs by hand using a weed wrench.
- Cut shrubs to just above ground level using loppers or brush cutters during the dry season in areas sensitive to ground disturbance.

English Ivy

English ivy is a woody vine generally found in moist areas with dense canopies and good shade cover. Recommendations for English ivy areas follow:

- Pull vines that are climbing trees and on the ground by hand or using rakes.
- Cut stems with pruners or loppers and dig up roots using shovels to prevent resprouts.
- Utilize prescribed herbivory, as appropriate, to remove ivy.

Italian Thistle

Italian thistle is an invasive species commonly found in disturbed areas, grasslands, and riparian areas. This species occurs in concentrated patches throughout the Open Space VMP Area. Recommendations for Italian thistle areas follow:

- Smaller infestations can be removed by hand by pulling, digging, and cutting. Digging may be restricted in areas that contain sensitive habitat, including riparian, chaparral, and oak woodland especially in areas upslope of aquatic resources and in areas with steep slopes due to the high level of soil disturbance.
- Pull plants by hand once the plant has bolted but prior to flower production.
- Cut plants by hand or brush cutters before the thistle flowers and again in early summer to reduce energy reserves. This treatment is best used in the dry season when soils are hard and hand pulling is more difficult.
- Graze infestations in the early spring when individual plants are approximately 4 to 6 inches high. Grazing should continue for about 2 to 3 weeks, or in coordination with the contracted grazing manager.

- Treat plants with herbicides in mid-spring before they spread seed. Restrictions apply to sensitive habitat areas as detailed below in Section 2.3.7 *Avoidance and Minimization Implementation*.

Riparian Woodland

Riparian woodlands generally contain dense canopies with intermittent to continuous understories. Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. Riparian areas are sensitive and vegetation management activities should be minimal to protect and avoid impacts to sensitive resources per the AMMs and BMPs below in Section 2.3.7 *Avoidance and Minimization Implementation.* Recommendations for riparian areas follow:

- Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel.
- Target climbing and ladder fuels, such as poison oak and giant reed (*Arundo donax*). Three feet of separation should be maintained between surface fuels and low-lying canopy branches.
- Remove highly flammable species.
- Monitor canopy continuation and connectivity. In areas with gaps in the canopy, understory growth, including ladder fuels, is more prevalent. These gaps, if present, should maintain three times the vertical distance of the height of surface fuels, which should be trimmed or removed to ensure no highly flammable pockets of dense vegetation forms.

2.3.6 *Area-Specific Treatments*

As previously mentioned, the Open Space VMP is consistent with the CalVTP created by CAL FIRE. CalVTP separates the state into ecoregions and treatable landscapes. The Open Space VMP Area is part of the 261A Central California Coast Ecoregion. Ecoregions are generally characterized as areas with similar or recurring patters of physical and biological characteristics that may include geology, soils, geomorphology, hydrology, climate, vegetation types, animal species composition, biodiversity, and land use history (CAL FIRE 2019a). This method helps identify the range of biological resources and sensitive biological resources near or adjacent to implementation areas, provides a relevant scale for analyzing potential impacts, and demonstrates that potentially affected resources and impacts of treatments were considered prior to implementation. The following sections describe wildfire hazards, if present, and specific treatment activities for the Open Space VMP in accordance with CalVTP treatment standards. Appendix B shows the areas within Open Space VMP location for each treatment type and summarizes the treatment activities, timing, and standards for each open space area.

SANTA ROSA/HEINTZ OPEN SPACE

The Santa Rosa/Heintz combined open space areas will require a combination of fuel modification treatments and treatment activities to manage wildfire risk, including grazing or mowing, creating shaded fuel breaks adjacent to the open space boundary and along trails and fire roads, and pruning and thinning of trees and shrubs to reduce ladder fuels.

The Santa Rosa Open Space is one of the steepest and largest open space areas in the Open Space VMP Area along with the Heintz Open Space, which sits due west of Santa Rosa Open Space. Sixty-one percent of slopes are categorized as gently sloped (0%–20% sloped) and 39% are categorized as moderately steep (20%–40% sloped). Both the size and steepness of slopes in this open space area create a high wildfire risk. Although the vegetation is well managed in most areas, there are areas of canopy connectivity, stockpiled woody debris, dense understories, and minor powerline entanglement. All these factors contribute to a high wildfire risk. In general, the steeper the slope the greater the rate of wildfire

spread, as flames from below heat and dry fuels above, making them more available for combustion. Strong winds funneled through the hillside could cause a wildfire to spread at a more rapid rate through open space area towards residences and other infrastructure, which is most dense north and south of the open space boundary. Neighboring properties contain ornamental and landscaped vegetation, including eucalyptus trees, which are highly flammable. Fuels in the Santa Rosa Open Space are predicted to burn with flame lengths in an excess of 12 feet and rates of spread of 20 chains/hour or higher. Under these conditions, suppression strategies would be limited to indirect attack and use of mechanized equipment. Santa Rosa Open Space is also difficult for emergency and fire access because of the scale and steeply sloped fire roads that weave through the open space. If a wildfire were to occur, it may take longer for response teams to access the site and contain the fire.

The Heintz Open Space has similar conditions to the Santa Rosa Open Space. The two open spaces are connected and are both steeply sloped. Within the Heintz Open Space, 54% of slopes are categorized as gently sloped and 46% are categorized as moderately steep. It is very likely that if a wildfire were to start in one of the open spaces, it would easily spread to the other. Due to the overall aspect of both the Santa Rosa and Heintz Open Space areas, vegetation and ground warming from prolonged sun exposure could also cause wildfire to spread upslope more quickly than it would in flatter, cooler areas. Canopy connectivity and proximity and density of residences and infrastructure surrounding the open space area also contribute to the high-risk designation of this open space. Heintz Open Space is also subject to strong winds, which could cause rapid and unpredictable wildfire dispersion. Flame length and rate of spread within Heintz Open Space are also consistent with the Santa Rosa Open Space. These factors create additional constraints for fire response teams. This area is more difficult for emergency and fire access because of the scale and steeply sloped fire roads that weave through the open space. Just as in the Santa Rosa Open Space, if a wildfire were to occur, it may take longer for response teams to access the site and contain the wildfire.

LA RINCONADA PARK

La Rinconada Park will require a combination of fuel modification treatments and treatment activities to manage wildfire risk, including grazing or mowing, creating shaded fuel breaks adjacent to the park boundary and along trails and fire roads, pruning and thinning of trees and shrubs to reduce ladder fuels, and removing invasive species. Standards for riparian and oak woodland for pruning and reducing ladder fuels along Scott Creek should be followed, as detailed above in *Standards for Vegetation Communities within the VMP Area*. Invasive plants, including ivy, broom, acacia, and privet, should be managed, and AMMs and BMPs for ephemeral/intermittent drainages should be implemented, as seen below in Section 2.3.7 *Avoidance and Minimization Implementation*.

La Rinconada Park has a low wildfire risk and priority level of three, making it the lowest-priority area of the Open Space VMP. This park is mostly flat with 90% of slopes categorized as gently sloped and 10% are categorized as moderately sloped. This park is adjacent to the La Rinconada Country Club and golf course to the east, which is dominated by irrigated and regularly mowed turf that acts as a fuel break. In addition, approximately 70% of the western park boundary is also composed of mowed turf, which also acts as a fuel break. Although there are highly flammable species present, these species are currently only present in low quantities and do not pose a serious threat. These species should be removed to maintain a low wildfire risk but are not a high priority at this time. Since La Rinconada Park is small and flat, it would likely have a slower dispersal rate and overall risk. Fuels are predicted to burn with flame lengths of 0 to 4 feet and rates of spread of 0 to 2 chains/hour. Under these conditions, multiple wildfire suppression strategies are readily available, including direct attack. Adjacent multi-lane roadways also provide easy access for emergency vehicles.

WORCESTER PARK

Worcester Park will require a combination of fuel modification treatments and treatment activities to manage wildfire risk, including grazing or mowing, creating shaded fuel breaks adjacent to the park boundary and along trails and fire roads, pruning and thinning of trees and shrubs to reduce ladder fuels, and removing invasive species. Standards for fuel reduction within Oak Woodland habitat should be followed, as detailed above in *Standards for Vegetation Communities within the VMP Area*. Ladder and surface fuels should be reduced and invasive plants, including dense broom, ivy, vinca, Italian thistle, acacia, and tree of heaven, should be managed.

Worcester Park is a priority level two, moderate risk park within the VMP Area. The park is gently sloping with 99% of slopes categorized as gently sloped and 1% are categorized as moderately sloped. Concentrated areas of highly flammable vegetation and woody debris are interspersed in the understory. Almost the entire park boundary is surrounded by high-density residences and other infrastructure. This park is small and gently sloped and will likely have a slow wildfire dispersal rate and low overall risk. Fuels predicted to burn with flame lengths of 0 to 4 feet, with small pockets with potential to burn with 8-foot flame lengths, and rates of spread of 0 to 5 chains/hour or higher. Under these conditions, suppression strategies include direct attack, with some indirect attack. Access for fire response via fire roads, trails, or adjacent roadways allows for prompt containment of the fire. In addition, adjacent multi-lane roadways provide easy access for emergency vehicles and large apparatus.

NOVITIATE PARK

Novitiate Park will require a combination of fuel modification treatments and treatment activities to manage wildfire risk, including grazing or mowing, creating shaded fuel breaks adjacent to the park boundary and along trails and fire roads, pruning and thinning of trees and shrubs to reduce ladder fuels, and removing invasive species.

Novitiate Park is a moderate-risk park within the VMP Area. This park is categorized as 83% gently sloped and 17% moderately sloped, which is along the northern portions of the park boundary. Overall, vegetation is dense but well maintained except for a dense area of French broom along the eastern park boundary. In addition, excess fuels, including woody debris and slash, are present in the understory and require management. This park is small and gently sloped and will likely have a slow wildfire dispersal rate and low overall risk. Fuels are predicted to burn with flame lengths of 0 to 4 feet and rates of spread of 0 to 5 chains/hour or higher. Under these conditions, suppression strategies include direct attack, with some indirect attack. This park is also an accessible area to emergency vehicles, although the streets are narrow and often congested with cars from park users.

2.3.7 *Avoidance and Minimization Implementation*

Table 2 outlines practices intended to avoid and minimize potential impacts to sensitive resources associated with implementation of vegetation treatment or removal.

Table 2. Site- and Work-Specific Avoidance and Minimization Measures

ID #	Avoidance and Minimization Measure
General Measures	
1	The boundaries of the treatment area and protected resources will be clearly defined on maps and with highly visible flagging or other clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist).
2	During project activities, all trash that may attract predators shall be properly contained, removed, and disposed of regularly. Following vegetation management activities, trash and debris shall be removed from work areas.
Visual Resources Measures	
3	All treatment-related materials, including vehicles, vegetation treatment debris, and equipment, will be stored outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. Materials staging and storage areas will be located outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible.
4	Sufficient vegetation within, at the edge of, or adjacent to treatment areas will be preserved to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions.
5	When possible, project activities will ensure that fuel breaks or tree removals are blended into the surrounding environment.
Air Quality Measures	
6	Idling of construction vehicles and equipment shall be minimized to no more than 3 minutes to the extent feasible. Construction foremen shall include briefing crews on vehicle use as part of pre-construction site meetings. These briefings shall include discussion of "common sense" vehicle use.
7	To minimize dust control during vegetation management activities, the following measures will be implemented: a. Speed limits will be limited to 15 miles per hour on unpaved areas. b. If the use of unpaved roads creates excessive dust, water trucks will be used, as necessary. c. Visible dust, silt, or mud tracked-out on to public paved roadways will be removed.
Cultural Resource Measures	
9	Cultural research will be conducted prior to implementing treatments as part of a cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically trained resource professional will review records; review study maps; read pertinent ethnographic, archaeological, and historical literature specific to the area being studied; and conduct other tasks to maximize the effectiveness of the survey.
10	An archaeologically trained resource professional and/or qualified archaeologist will conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resources survey completed.
11	If during any phase of the project, cultural and/or paleontological resources or human remains are discovered, work will be stopped until the find has been evaluated and the potential significance determined by a qualified professional archaeologist and an appropriate course of action has been recommended.
12	A training will be conducted for all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance).

ID #	Avoidance and Minimization Measure
Biological Resources Measures	
13	Project activities will be designed to avoid significant effects on special-status species that are listed as rare, threatened, or endangered under federal law or are listed as rare, threatened, endangered, candidate, fully protected, or species of special concern under state law. A desktop review of the California Natural Diversity Database (CNDDB) and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation system has been conducted and a reconnaissance survey of the roadways and parks was completed by SWCA in June and July 2020. a. A qualified biologist will be retained to conduct a training for field personnel on sensitive habitat and species prior to vegetation management work. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified biologist. b. A qualified biologist will be engaged prior to all work to review the work locations. The biologist will be retained to survey the project area for special-status plant and wildlife species if work occurs adjacent to suitable habitat. All surveys will be conducted in the appropriate season. c. A qualified biologist will be retained to conduct a nesting bird survey if work occurs during the nesting bird season (generally March 1–September 15). If a nesting bird is found, the biologist will provide measures to avoid impacting the species, such as implementing an appropriate no disturbance buffer. d. A qualified biologist will be retained to conduct surveys for roosting bats prior to any tree trimming or tree removal. If a roosting bat is found, the biologist will provide measures to avoid impacting the species, such as an appropriate no disturbance buffer or exclusion.
14	If special-status wildlife is encountered during project activities, it will be unharmed, it will be allowed to leave the area on its own volition, or the appropriate regulatory agency (i.e., USFWS or California Department of Fish and Wildlife [CDFW]) will be contacted to determine the appropriate action to relocate the species.
15	If sensitive natural communities are determined to be present in the treatment area as part of Measure 13, a qualified biologist will perform a protocol-level survey following the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* of the treatment area prior to the start of treatment activities to map sensitive natural communities and sensitive habitats in the treatment area.
16	Treatments in chaparral habitats will implement the following in consultation with a qualified biologist: a. Develop a treatment design that avoids conversion of the chaparral vegetation alliance, including evaluating and determining the appropriate spatial scale at which the proponent would consider the chaparral alliance converted. Demonstrate with substantial evidence that the habitat function of chaparral would not be converted. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. b. Maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid vegetation conversion.
17	To minimize impacts to natural resources, the area of ground disturbance will be limited to the minimum footprint necessary to meet the goals and objectives of vegetation management activities.
18	Project activities will be conducted to avoid introducing or spreading invasive plant species. The following are California Invasive Plant Council (Cal-IPC) BMPs to prevent the spread of invasive species (Cal-IPC 2012): a. Provide prevention training to staff and contractors prior to starting work. b. Schedule activities to minimize potential for introduction and spread of invasive plants. c. Designate waste disposal areas for invasive plant materials and contain invasive plant material during transport. d. Plan travel routes to avoid areas infested with invasive plants. e. Clean tools, equipment, vehicles, and animals before transporting materials and before entering and leaving worksites. f. Clean clothing, footwear, and gear before leaving infested areas. g. Carry portable cleaning tools that can be used without water. h. Prepare worksites to limit the introduction and spread of invasive plants. i. Minimize soil and vegetation disturbance. j. After activities, monitor worksites for invasive plants. k. Prevent invasive plant contamination of project materials when stockpiling and during transport.

ID #	Avoidance and Minimization Measure
19	Prevent the risk of pathogens spread in sensitive natural communities by implementing the following BMPs: a. Include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training. b. Clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site or a site where contamination is a risk. c. Minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment. d. Minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination. e. Clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high-risk to low-risk areas or between widely separated portions of a treatment area. f. Follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (CA Oak Mortality Task Force 2016).
20	If temporary fencing is used for prescribed herbivory, it will be wildlife friendly, and a qualified biologist will review and approve the design prior to installation.
Aquatic Resources Measures	
21	If work will impact riparian vegetation, the Town will consult the CDFW and Regional Water Quality Control Board (RWQCB), as appropriate.
24	Treatments in riparian habitats will be designed to retain or improve habitat functions by implementing the following: a. Retain at least 75% of the overstory and 50% of the understory canopy of native riparian vegetation within the limits of mapped riparian habitat (see Measure 15). Native riparian vegetation will be retained in a well-distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. b. Limit treatments to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. c. Limit removal of large, native riparian hardwood trees (e.g., willow, ash, oak, maple, alder, sycamore, cottonwood). d. Fell removed trees away from adjacent streams or waterbodies and pile outside the mapped riparian area. e. Avoid removing vegetation that could reduce stream shading and increase stream temperatures. f. Limit ground disturbance to the minimum necessary to implement effective hazardous fuel reduction.
25	Herbicide use in riparian areas associated with the Open Space VMP will be applied by hand application only. Only herbicides approved for aquatic environments will be used.
26	Herbicide application will occur outside the wet season (generally November 1–April 14) when seasonal streams are low flow or dry.
27	Herbicide treatments must be performed in accordance with federal and state regulations by a licensed Pest Control Advisor. Applicators will follow all herbicide label requirements and refer to all other BMPs regarding mandatory measures to protect sensitive resources and employee and public health during herbicide application.
28	No work will occur in standing water associated with a stream or creek in the VMP Area.
29	During VMP implementation, fuel and hazardous materials will be kept at 100 feet from waterbodies to provide protection from accidental leaks or spills.
30	All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 100 feet from potentially jurisdictional drainages.
31	Prior to the onset of work, the Contractor shall ensure that there is a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills, and of the appropriate measures to take should a spill occur.
32	Soil and trimmed or chipped vegetation will not be placed where it could enter a waterbody or cover vegetation.
33	If grazing occurs adjacent to riparian features, livestock will be excluded from the area using exclusion fencing or methods approved by the project biologist and grazing manager.

ID #	Avoidance and Minimization Measure
Geology/Soils Measures	
34	Suspend mechanical treatments, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30% or more) of rain within the next 24 hours. Activities that cause soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur).
35	Heavy equipment operations will not be conducted on slopes greater than 50% or in any slide or unstable areas.
36	Limit heavy equipment use in areas that could cause soil disturbance or compaction when soils are wet and saturated to avoid compaction and/or damage to soil structure.
37	Erosion control measures will be installed, as necessary to minimize erosion, according to manufacturers' specifications. Appropriate erosion control measures include, but are not limited to, the following: • silt fences • straw bale barriers • brush or rock filters • storm drain inlet protection • sediment traps • sediment basins • erosion control blankets and mats • soil stabilization (e.g., tackified straw with seed, jute, or geotextile blankets, broadcast and hydroseeding) Erosion control measures will be inspected prior to the rain season and immediately repaired, as necessary. All temporary construction-related erosion control methods (e.g., silt fences) shall be removed at the completion of the project.
Noise Measures	
38	Per the Town of Los Gatos Noise Ordinance (Section 16.20.035), vegetation management activities will be limited to the hours between 8:00 a.m. and 6:00 pm Monday through Friday, and 9:00 a.m. to 4:00 p.m. on Saturday (Town of Los Gatos 1991).
39	All power equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.
Traffic Control Measures	
40	Prepare and implement a Traffic Control Plan to describe procedures to guide traffic (e.g., signage, flaggers), safeguard construction workers, provide safe passage of traffic, and minimize traffic impacts, as necessary, through the duration of the vegetation management project. Coordinate with work with local emergency services providers, as necessary, to ensure that emergency vehicle access and response is not impeded.
Public Health and Safety Measures	
41	The project will maintain fire-safe working conditions BMPs. These will include: a. All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for incipient stage fire suppression. b. No smoking is allowed in any areas of vegetation management activities along Town roadways or in Town open spaces or parks. All vehicle parking will be restricted to paved or graveled surfaces. c. Require spark arrestors on all off-road equipment. d. Monitor weather and fire danger on a daily basis. During Red Flag Warnings, a crew member will be assigned to fire watch for each separate and distinct active work area.

3 ENVIRONMENTAL CHECKLIST

Vegetation Treatment Project Information

1.	**Project Title:**	Los Gatos Open Space Vegetation Management Plan
2.	**Project Proponent's Name and Address:**	Town of Los Gatos Department of Public Works 1422 Monterey Street Los Gatos, CA 93401
3.	**Contact Person Information and Phone Number:**	Stefanie Hockemeyer (408) 399-5761 shockemeyer@losgatosca.gov
4.	**Project Location:**	Town of Los Gatos undeveloped parks and open space (see Section 2, *Project Description*, and Figure 1)
5.	**Total Area to be Treated (Acres):**	Approximately 193.91 acres

Description of Project: The project would perform fuel reduction treatments to remove hazardous vegetation from 193.91 acres of Town-owned open space lands and undeveloped parks, including Santa Rosa Open Space (75.89 acres), Heintz Open Space (88.12 acres), Worcester Park (11.33 acres), La Rinconada Park (8.64 acres), and Novitiate Park (9.93 acres) (see Figure 1).

a. Initial Treatment

Initial treatments would include primarily mechanical treatments and prescribed herbivory for fuel reduction treatments and to create strategically located fuel breaks within and surrounding five undeveloped parks and open space areas adjacent to WUI areas. In addition to mechanical treatment and prescribed herbivory, application and manual activities would be used for invasive species removal, and manual activities would be used for work in sensitive areas including riparian corridors. See Section 2, *Project Description*.

Treatment Types

- ☒ Wildland-Urban Interface Fuel Reduction
- ☒ Fuel Break
- ☐ Ecological Restoration

Treatment Activities

- ☒ Prescribed Herbivory, up to 137 acres
- ☒ Mechanical Treatment, up to 194 acres
- ☒ Manual Treatments, up to 194 acres
- ☒ Herbicide Treatments, up to 10 acres
- ☐ Prescribed Burning (Pile Burning), 0 acres
- ☐ Prescribed Burning (Broadcast), 0 acres

Fuel Type

- ☒ Grass Fuel Type
- ☒ Shrub Fuel Type
- ☒ Tree Fuel Type

b. Treatment Maintenance

Treatment maintenance methods would involve the same vegetation treatment activities used in the original treatment, including mechanical treatment, manual treatment, prescribed herbivory, and chemical application. Maintenance treatments would include similar equipment and would be required annually after initial treatments for Defensible Space areas and every 3 years for all other areas. Treatment maintenance activities would be subject to the identified Project Design Features and CalVTP SPRs.

6. Regional Setting and Surrounding Land Uses:

The proposed project is located in the Town of Los Gatos, in the San Francisco Bay Area, approximately 43 miles south of San Francisco. The Town is in the southwestern part of Santa Clara County at the base of the Sierra Azul mountain range, where the Santa Clara Valley meets the lower slopes of the Santa Cruz Mountains. The Town is bounded by the City of San Jose to the north and east, the City of Campbell to the north, the Cities of Monte Sereno and Saratoga to the west, and unincorporated areas of Santa Clara and Santa Cruz Counties to the south (Town of Los Gatos 2022a). The proposed project area encompasses a wide variety of terrain, ranging from flat topography at the edge of the valley floor to densely wooded hillsides. All five undeveloped parks and open space areas are surrounded, at least in part, by residential areas of the Town, and are in or near areas in the WUI and VHFHSZ.

7. Other Public Agencies Whose Approval is Required (e.g., permits):

None

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone

☐ The proposed project is within the Coastal Zone (check one of the following boxes)

☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable

☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

8. **Native American Consultation.** *For treatment projects that are within the scope of the CalVTP PEIR, Assembly Bill (AB) 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code Section 21080.3.1 during preparation of the PEIR. For treatment projects with impacts not within the scope of the PEIR, pursuant to Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3, project partners preparing a new negative declaration, mitigated negative declaration, or EIR must notify any California Native American tribe who has submitted written request for notification of a project in the area of the treatment site. Upon written request for consultation by a tribe, the project partners must begin consultation before the release of the environmental document and must follow the requirements of the cited Public Resources Code sections.*

The proposed project is within the scope of the PEIR; therefore, Assembly Bill (AB) 52 compliance has been completed. Pursuant to CalVTP SPR CUL-2, the project proponent would be required to obtain the latest Native American Heritage Commission (NAHC)-provided Native Americans Contact List to coordinate with geographically associated Native American tribe(s), which would identify locations of any known resources/areas with a high likelihood of finding archaeological or historical resources and would require protection or avoidance.

Environmental Determination

On the basis of this PSA and the substantial evidence supporting it:

- ☑ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, WITHIN THE SCOPE of the CalVTP PEIR. NO ADDITIONAL CEQA DOCUMENTATION is required.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project partners that would avoid or reduce the effects so that clearly no significant effects would occur. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature	**Date**
Printed Name	**Title**

4 PROJECT-SPECIFIC ANALYSIS

4.1 Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact AES-1: Result in Short- Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1 pages 3.2-16 to 3.2-19	Yes	AES-2/ AMM-3	NA	LTS	No	Yes
Impact AES-2: Result in Long- Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Wildland Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2 pages 3.2-20 to 3.2-22	Yes	AES-1/ AMM-5 AES-3/ AMM-4	NA	LTS	No	Yes
Impact AES-3: Result in Long- Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Nonshaded Fuel Break Treatment Type	LTS	Impact AES-3 pages 3.2-25 to 3.2-27	No	--	--	--	--	--

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Aesthetic and Visual Resources Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT AES-1

The proposed project area encompasses approximately 193.91 acres within five open space and undeveloped park areas within an LRA in the Town of Los Gatos (see Figure 1). These open space and park areas contain public hiking trails that pass through or in close proximity to some areas proposed for treatment. There are also two state roadways that are adjacent to or near the treatment areas, including State Route (SR)-17 and SR-85, as well as other local roadways (California Department of Transportation [Caltrans] 2022). Due to the dispersed geographical range of the proposed project, there are numerous public areas that provide views of the proposed treatment areas. There are two eligible scenic highways located in the vicinity of the proposed project area, including a portion of SR-17, which extends from the junction of SR-9 south to the City of Santa Cruz, and SR-9, which extends from the junction of SR-17 northwest towards the City of Monte Serreno. Past Monte Serreno, SR-9 becomes a designated scenic highway (Caltrans 2022). SR-9 is approximately 0.5 mile from proposed treatment areas in Worcester Park at its closest point. Proposed treatments would not be visible from SR-9 due to distance and intervening topography. However, SR-17 runs approximately 200 feet west of Novitiate Park and may provide public views of proposed vegetation treatments if they were to occur within its viewshed. Because the speed limit on SR-17 is 55 miles per hour and SR-17 is lined with trees that shield views of Novitiate Park, views from SR-17 would be fleeting and mostly shielded by existing vegetation.

The proposed project includes vegetation treatments over approximately 193.91 acres. The potential for these treatment types to result in short-term degradation of visual character was evaluated in the PEIR. Consistent with the PEIR, proposed vegetation treatments would result in the short-term presence of large trucks and mechanical equipment that could contrast with the natural environment. However, visibility of proposed treatments would be temporary, would not dominate or impede any views from scenic vistas or scenic highways, and would not introduce a new feature to the landscape. The proposed project includes AMMs that are integrated into the Open Space VMP to protect viewsheds. In addition, the PEIR includes SPRs to reduce visibility of proposed treatments from public viewing areas. SPR AES-2 and AMM-3 would require equipment storage and staging areas to be located outside of viewsheds from public trails, parks, recreation areas, and roadways as feasible to minimize visual impacts from the presence of equipment. Manual and mechanical treatment activities would be temporary in nature and minimized from public viewing areas. The potential for the proposed project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR, because the proposed treatment activities and types of equipment proposed for use are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-2

The proposed project includes removing hazardous trees, thinning understory trees and brush, reducing ladder fuels, and removing fuels along trails and fire roads throughout proposed treatment areas to reduce potential wildfire fuels within the WUI. Consistent with the PEIR, proposed vegetation treatments would not require all vegetation to be cleared and large healthy trees would remain at the discretion of the Town and its contractors; therefore, vividness, intactness, and unity of views would remain high, and the

proposed project would not permanently affect views from a scenic vista or state scenic highway. The proposed project includes AMMs that are integrated into the Open Space VMP to limit impacts to views. SPRs AES-1 and AES-3 and AMM-4 and AMM-5 would be implemented, as feasible, to break up or screen linear edges of a clearing, achieve a natural transitional appearance, and screen views from public areas, as feasible. Therefore, proposed treatment activities would not result in adverse long-term impacts related to aesthetic resources and project-specific impacts would be less than significant, which is consistent with the level of impact examined in the PEIR.

IMPACT AES-3

Impact AES-3 does not apply because the proposed project does not include implementation of a non-shaded fuelbreak.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.2.1, *Regulatory Setting*, and Section 3.2.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to aesthetics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics would occur.

4.2 Agriculture and Forestry Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1 pages 3.3-7 to 3.3-8	Yes	NA	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Agriculture and Forestry Resources Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT AG-1

The project area includes 193.91 acres within five managed open space and undeveloped park areas in the Town of Los Gatos within Santa Clara County. Treatment activities within the project area would only modify the landscape to reduce wildfire risk through tree thinning and removal. Target trees would include highly flammable invasive species and dying or declining trees. Native, healthy trees within the project area would be retained and protected. Per Public Resources Code (PRC) Section 12220(g), forest land is defined as land that can support 10% native tree cover of any species under natural conditions. Vegetation management and maintenance standards, as discussed in Section 2.3.5, *Vegetation Management and Maintenance Standards and Areas*, would be implemented to avoid impacts and retain the integrity of forest and woodland within the proposed treatment area. The implementation of the proposed treatment activities would continue to support more than 10% of native tree cover per PRC Section 12220(g). Therefore, the proposed project would not directly result in the loss of forest land, convert forest land to a non-forest use, or involve other changes in the existing environment that could

result in conversion of forest land to non-forest use. Project impacts would be less than significant, consistent with the impacts analyzed in the PEIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.3.1, *Regulatory Setting*, and Section 3.3.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to agriculture and forestry resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to agriculture and forestry resources would occur.

4.3 Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs and AMMs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Impact AQ-1 pages 3.4-26 to 3.4-32 Appendix AQ-1	Yes	AQ-1 AQ-4/AMM-7	MM AQ-1	LTSM	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Impact AQ-2 pages 3.4-33 to 3.4-34	Yes	AQ-1 HAZ-1 NOI-4 NOI-5 AMM-6	MM AQ-1	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Impact AQ-3 pages 3.4-34 to 3.4-35	Yes	AQ-4/ AMM-7 AQ-5	NA	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Impact AQ-4 pages 3.4-35 to 3.4-37	No	--	--	--	--	--
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5 pages 3.4-37 to 3.4-38	Yes	AQ-1 HAZ-1 NOI-4 NOI-5 AMM-6	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	PSU	Impact AQ-6 pages 3.4-36	No	--	--	--	--	--

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT AQ-1

The proposed project area is under the authority of the Bay Area Air Quality Management District (BAAQMD). It is located in the San Francisco Bay Area Air Basin, which is in state non-attainment for ozone and particulate matter less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$); and federal non-attainment for ozone and PM_{10}, and unclassifiable for $PM_{2.5}$ (BAAQMD 2023). The use of heavy vehicles and equipment during vegetation treatments would likely result in emissions of criteria pollutants (i.e., ozone, carbon monoxide [CO], nitrogen dioxide [NO_2], sulfur dioxide [SO_2], PM_{10}, $PM_{2.5}$, and lead) and ozone precursor emissions (reactive organic gases [ROG] and nitrogen oxides [NOx]). Criteria air pollutant and ozone precursor emissions have the potential to exceed BAAQMD emission thresholds and contribute to the nonattainment status with respect to the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) in the Bay Area Air Basin. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR.

Mechanical and Manual Treatments

Mechanical treatments would require the use of heavy machinery or equipment rather than hand or manual equipment. Grading, mowing, disking, cutting, masticating, and grubbing are all examples of mechanical treatments. The scope of the proposed project is consistent with the scope of the PEIR in regard to crew sizes and equipment use. Each individual treatment area would be relatively small, requiring between approximately one to three vehicles and a crew of less than 10 workers. The proposed project would treat a maximum of 193.91 acres per year, which is much less than the geographical scope (250,000 acres per year) evaluated in the CalVTP PEIR. There is potential for the proposed project to generate ROG and NOx emissions from equipment and vehicle use and PM_{10} and $PM_{2.5}$ emissions from crew transport along unpaved roadways. AMM-7 includes dust control measures. In addition, the PEIR includes SPRs to further reduce the potential for excessive emissions from proposed treatment activities. SPR AQ-1 requires proposed project compliance with all applicable BAAQMD air quality requirements. SPR AQ-4 would limit vehicle speeds on unpaved roads and require treatment crews to wet unpaved roads if excessive dust is created during road use, that vehicles be cleaned prior to leaving treatment sites to reduce the inadvertent transport of dust from unpaved areas onto paved roads, and the suspension of ground-disturbing activities when they result in visible dust transport outside the boundary of treatment areas. Implementation of SPRs AQ-1 and AQ-4 and AMM-7 would reduce potential criteria pollutant emissions, including PM_{10} and $PM_{2.5}$ emissions during proposed treatment activities. In addition, PEIR MM AQ-1 would require the implementation of on-road vehicle and off-road equipment exhaust emission reduction techniques during treatment activities to further reduce criteria air pollutant and ozone precursor emissions from individual treatments. Due to the dispersed geographical scope of the proposed project, there is potential for multiple treatments to occur within the project area at one time. However, due to the small geographic scope of the project area and with implementation of AMMs, SPRs, and MMs, it is unlikely that there will be an exceedance of established emissions thresholds. Overall, there is unlikely to be a short-term increase in criteria air pollutants that could exceed NAAQS, CAAQS, and/or BAAQMD thresholds and this impact would be less than significant. Even if the proposed project did exceed NAAQS, CAAQS, and/or BAAQMD thresholds, this impact would be consistent with the PEIR.

Prescribed Burns

The proposed project does not include prescribed burns. No impact related to prescribed burns would occur.

Conclusion

Proposed project activities are not expected to temporarily exceed established NAAQS, CAAQS, and/or BAAQMD thresholds and would be consistent with emission reduction strategies and air quality plans adopted by the BAAQMD. Due to the relatively small geographical scope and the lack of prescribed burns in the proposed project, the project is unlikely to result in a short-term increase in criteria air pollutants that may exceed NAAQS, CAAQS, and/or BAAQMD thresholds. Therefore, impacts related to the proposed project would be less than significant related to an increase in pollutant emissions from proposed treatment activities. Even if the project did exceed standards, it would be consistent with the evaluation and determination of the PEIR. No new or more severe significant impacts would occur as a result of the proposed project.

IMPACT AQ-2

Proposed treatment areas encompass approximately 193.91 acres of undeveloped parks and open spaces within the Town and would be located near numerous sensitive receptors. The PEIR evaluates the potential for CalVTP vegetation management activities to expose sensitive receptors to substantial short- and long-term diesel particulate matter (DPM) emissions in a manner that could increase cancer risk greater than 10 in one million to a Hazard Index of 1.0 or greater. Consistent with the evaluation included in the PEIR, the proposed project would require the use of heavy vehicles and equipment and crew transportation, which would increase DPM emissions in the project area. However, proposed treatment activities are not anticipated to expose sensitive receptors to substantial DPM emissions because treatment activities would progress across treatment sites; therefore, DPM emissions generated by treatment activities would not take place near any single sensitive receptor for an extended period of time. In addition, treatment activities would be short term and intermittent and would not result in a new long-term source of DPM emissions in the project area.

SPRs and MMs were included in the PEIR to further reduce the potential for public exposure to DPM emissions during proposed activities. SPR HAZ-1 requires that all diesel- and gasoline-powered equipment be properly maintained to comply with all federal and state emissions requirements, which would prevent excessive emissions of DPM due to poorly functioning equipment. SPR NOI-4 requires vegetation treatment activities and staging areas be located as far as possible from human receptors, and SPR NOI-5 and AMM-6 restrict equipment idling time. SPR AQ-1 requires proposed project compliance with all applicable BAAQMD air quality requirements. Since the proposed project is not anticipated to expose people to substantial DPM emissions and implementation of SPRs would further reduce potential exposure, further mitigation would not be necessary; however, PEIR MM AQ-1, which is required for Impact AQ-1, would further reduce potential impacts through the implementation of on-road vehicle and off-road equipment exhaust emission reduction techniques during treatment activities. Since proposed treatment activities would be short term and intermittent and would not expose any sensitive receptors to DPM for an extended period of time, proposed treatment activities would not expose any person to an incremental increase in cancer risk associated with DPM greater than 10 in one million to a Hazard Index of 1.0 or greater, and impacts would be less than significant. Implementation of SPRs HAZ-1, NOI-4, NOI-5, and AQ-1; PEIR MM AQ-1; and AMM-6 would further reduce the potential for substantial exposure to any sensitive receptor. Therefore, impacts would be less than significant, which is consistent with the determination of the PEIR, and no new or more severe impacts would occur.

IMPACT AQ-3

According to the U.S. Geological Survey (USGS) and California Geological Survey (CGS) maps, there are mapped ultramafic rock outcrops containing asbestos in the vicinity of the proposed treatment areas (USGS 2011; CGS 2000; CGS 2011a; CGS 2011b). There is potential for naturally occurring asbestos (NOA) to be present within or near these areas of ultramafic rock. The proposed project does not include the demolition of any buildings or structures that may contain asbestos-containing material (ACM). The PEIR evaluates the potential for vegetation treatment activities to generate dust emissions that may expose people to NOA, if present within disturbance areas. AMM-7, included in Section 2, *Project Description* (see Table 2), requires keeping speed limits to 15 miles per hour, using water trucks to control dust, and removed track out to control dust. The PEIR includes SPRs to reduce fugitive dust emissions that may contain NOA. Based on the potential for NOA to be present within the Open Space Areas, SPRs AQ-4 and AQ-5 have been included for the proposed project. SPR AQ-4 requires treatment crews to reduce the amount of dust generated by vehicle and equipment use on unpaved roads and SPR AQ-5 requires the preparation and implementation of an Asbestos Dust Control Plan and/or avoidance of ground disturbance in areas where NOA is likely to occur. With implementation of SPRs AQ-4 and AQ-5 and AMM-7, the proposed project would not expose people to fugitive dust emissions containing NOA. Therefore, project-specific impacts would be less than significant, which is consistent with the determination of the PEIR.

IMPACT AQ-4

Impact AQ-4 does not apply because the proposed project does not include implementation of prescribed burns.

IMPACT AQ-5

As described in Impact AQ-2, the use of diesel-powered equipment has the potential to expose people to objectionable odors from diesel exhaust. Consistent with the PEIR, diesel exhaust emissions from the proposed project would be short term and intermittent, progress across treatment sites such that odors from diesel exhaust would not be generated in a single location for an extended period, and dissipate rapidly from the source. Therefore, the proposed project is not anticipated to expose people to odors from diesel exhaust. Additionally, SPRs have been included to further reduce the potential for exposure to substantial diesel exhaust emissions, including SPRs HAZ-1, NOI-4, NOI-5, and AQ-1 and AMM-6, as described in Impact AQ-2. Therefore, project-specific impacts would be less than significant, which is consistent with the determination of the PEIR. No new or more severe impacts would occur.

IMPACT AQ-6

Impact AQ-6 does not apply because the proposed project does not include the implementation of prescribed burns.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, *Regulatory Setting*, and Section 3.4.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality present in the areas outside the treatable

landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

4.4 Archaeological, Historical, and Tribal Cultural Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1 pages 3.5-14 to 3.5-15	Yes	CUL-1 CUL-7 CUL-8/ AMM-12 AMM-10	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2 pages 3-5.15 to 3.5-16	Yes	CUL-1 CUL-2 CUL-3/ AMM-9 CUL-4/ AMM-10 CUL-5 CUL-8/ AMM-12 AMM-11	CUL-2	LTSM	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3 page 3.5-17	Yes	CUL-1 CUL-2 CUL-3/ AMM-9 CUL-4/ AMM-10 CUL-5 CUL-6/ AMM-11 CUL-8/ AMM-12	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4 page 3.5-18	Yes	AMM-11	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Archaeological, Historical, and Tribal Cultural Resources Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT CUL-1

The proposed project includes vegetation treatments over approximately 193.91 acres within five open space and undeveloped park areas. Consistent with the PEIR, proposed vegetation treatment activities may occur in areas that contain built historical resources and could potentially result in damage to these structures located adjacent to treatment areas. A California Historical Resources Information System (CHRIS) search through the Northwest Information Center (NWIC) was performed for previously recorded cultural resources within 0.25 mile of the proposed project area (NWIC 2020). Two historical structures were recorded within 0.16 mile of Worcester Park and within 0.25 mile of Novitiate Park. No historical resources were recorded within any of the treatment areas and all adjacent structures would be avoided during treatment implementation.

The proposed project would implement AMM-9 through AMM-12, included in Section 2, *Project Description* (see Table 2), during treatment activities in order to avoid impacts to built environment, historical resources. In addition, SPRs CUL-1, CUL-7, and CUL-8, included in the PEIR, would be implemented to avoid any substantial adverse change to any built historical resources. AMM-9 and SPR CUL-1, which require that a recent records search for archaeological and historical resources, has already been implemented. AMM-10 requires that a qualified archaeologist conduct a site-specific survey of the treatment area. SPR CUL-7 and AMM-11 require the avoidance of known built historical resources and the avoidance of built environment structures that have not yet been evaluated for historical significance. SPR CUL-8 and AMM-12 require that workers be trained regarding protection of historical resources and to stop work if any resources are found. Therefore, project-specific impacts related to built environment historical resources would be less than significant, consistent with the PEIR, and would not result in any new or more severe impacts.

IMPACT CUL-2

The proposed project includes vegetation treatments over approximately 193.91 acres within five open space and undeveloped park areas. Consistent with the PEIR, the proposed project primarily includes treatment types that either require no soil disturbance or very shallow soil disturbance. However, it is possible unique archaeological or subsurface historical resources could be disturbed during treatment activities, especially where mechanical treatments could result in churning the ground surface during vegetation removal.

The proposed project would implement AMM-9 through AMM-12, included in Section 2, *Project Description* (see Table 2), during treatment activities in order to ensure the avoidance and protection of archaeological resources present within the proposed project area. In addition, SPRs CUL-1 through CUL-5 and CUL-8, included in the PEIR, would be implemented to further minimize the risk of damaging known or unknown subsurface archaeological and historical resources during treatment activities. SPR CUL-1 and AMM-9 require that a recent records search for archaeological and historical resources has already been completed. SPR CUL-2 requires coordination with geographically associated Native American tribe(s), which would identify locations of any known resources/areas with a high likelihood of finding archaeological or historical resources and would require protection or avoidance.

SPR CUL-3 and AMM-9 require pre-field research to become familiar with the area and potential resources. SPR CUL-4 and AMM-10 require an archaeological survey of the treatment area to identify archaeological resources. SPR CUL-5 requires working with the geographically affiliated tribe(s) to avoid and protect any resources identified. SPR CUL-8 and AMM-12 require that workers be trained regarding protection of historical resources and to stop work if any resources are found. In addition, AMM-11 and PEIR MM CUL-2 would require the protection of inadvertently discovered unique archaeological and/or subsurface historical resources by requiring all work stop, evaluation of the significance of the find, and development of an appropriate course of action.

The scope of the PEIR considers this impact to be significant and unavoidable based on the large geographical scope, which increases the likelihood for unknown resources to be present within treatment areas, and the wide variety of resource types present throughout the state. However, the proposed project only encompasses approximately 193.1 acres and would be conducted on a much smaller scale than what is analyzed in the PEIR. AMMs, SPRs, and MMs would be implemented to ensure the protection of archaeological or subsurface historical resources. Therefore, due to the small scale and low level of ground disturbance that would be generated during project treatments, project-specific impacts would be less than significant and would not result in any new or more severe impacts.

IMPACT CUL-3

The proposed project includes treatment activities that have the potential to impact tribal cultural resources if present within or adjacent to treatment areas. The proposed project would implement AMM-9 through AMM-12, discussed above and included in Section 2, *Project Description* (see Table 2), during treatment activities in order to avoid any substantial adverse change to tribal resources. In addition, SPRs CUL-1 through CUL-5 and CUL-8, as described in Impact CUL-2 above, and SPR CUL-6 would be implemented to avoid or minimize the potential to disturb cultural resources that may be present within the project area. SPR CUL-6 requires consulting with the geographically affiliated tribes to avoid or protect any identified tribal cultural resources. AMMs and SPRs would be implemented to avoid or reduce the potential to disturb tribal cultural resources that may be present within proposed treatment areas. Therefore, project-specific impacts would be less than significant and would not result in any new or more severe impacts.

IMPACT CUL-4

Per the PEIR, prehistoric or historic-era marked or unmarked interments and cremated remains are present throughout California. The proposed project includes ground-disturbing treatment activities such as mechanical treatments that could potentially uncover previously unknown human remains. Consistent with the PEIR, the proposed project would be subject to California Health and Safety Code (CHSC) Sections 7050.5 and 7052 and PRC Section 5097, which identified the procedures for the treatment of Native American human remains. Compliance with CHSC Sections 7050.5 and 7052 and PRC Section 5097 requires avoiding or minimizing disturbance of human remains, and following the appropriate protocols if remains are unearthed. Therefore, project-specific impacts would be less than significant, which is consistent with the PEIR. No new or more severe impacts would occur.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.5.1, *Regulatory Setting*, and Section 3.5.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in

the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, and tribal cultural resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to archaeological, historical, and tribal cultural resources would occur.

4.5 Biological Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1 pages 3.6-132 to 3.6-139	Yes	BIO-2/ AMM-13 BIO-3/ AMM-15 BIO-7 BIO-9/ AMM-18	BIO-1a BIO-1b BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) SU (bumble bees)	Impact BIO-2 pages 3.6-139 to 3.6-187	Yes	BIO-2/ AMM-13 BIO-3/ AMM-15 BIO-4/ AMM-24 BIO-5/ AMM-16 BIO-10/ AMM-13 BIO-11/ AMM-20 BIO-12/ AMM-13 HAZ-5/ AMM-31 HAZ-6 HYD-1/ AMM-21 HYD-4/ AMM-1, AMM-30	BIO-2a BIO-2b BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3 pages 3.6-186 to 3.6-191	Yes	BIO-2/ AMM-13 BIO-3/ AMM-15 BIO-4 BIO-5/ AMM-16 BIO-6/ AMM-19 BIO-9/ AMM-18 HYD-4/ AMM-1, AMM-30 AMM-17, AMM-20, and	BIO-3a BIO-3b BIO-3c BIO-4	LTSM	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
				AMM-24 through AMM-28				
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4 pages 3.6-191 to 3.6-192	Yes	BIO-1 HYD-1 HYD-3 HYD-4 AMM-21 through AMM-37	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5 pages 3.6-198 to 3.6-199	Yes	BIO-1 BIO-4 BIO-5 BIO-10 BIO-11 BIO-12 HYD-1 HYD-4 AMM-21 through AMM-37	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6 pages 3.6-192 to 3.6-196	Yes	BIO-1 BIO-2/ AMM-13 BIO-3/ AMM-15 BIO-4/ AMM-24 BIO-5 BIO-12/ AMM-13 AMM-20 AMM-33	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	LTS	Impact BIO-7 pages 3.6-198 to 3.6-199	Yes	BIO-1 through BIO-5 BIO-10 through BIO-12 HYD-1 HYD-4 AD-3 AMM-13 through AMM-33	BIO-2a BIO-2b BIO-3a BIO-3b BIO-3c BIO-4 BIO-5	LTSM	No	Yes
Impact BIO-8: Conflict with the Provisions of an	NI	Impact BIO-8	No	--	--	--	--	--

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan		pages 3.6-199 to 3.6-200						

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

The project area includes a total of approximately 193.91 acres within five Town-owned and managed open space and undeveloped park areas, including two open space areas and three undeveloped parks within the Town. The project area is comprised of five distinct locations, including Santa Rosa Open Space, Heintz Open Space, La Rinconada Park, Novitiate Park, and Worcester Park. The Open Space VMP Area is dominated primarily by urban land, hardwood woodland, and herbaceous and shrub cover. Urban land is present throughout the Open Space VMP Area and concentrated mainly around roadways and in gently sloping and flat areas. As the terrain steepens, urban development mostly consists of homes, infrastructure, and developed parks surrounding open space and undeveloped park boundaries. Oak woodland is present throughout the Open Space VMP Area but dominates in the foothills and canyons along the southern Town boundary along with other hardwood woodland species, described in more detail below. California oak woodland is a sensitive vegetation community. Herbaceous and shrub species are interspersed in understories and canopy openings throughout the southern portion of the VMP Area. Vegetation communities and individual vegetation species observed at each location in the VMP Area are described in more detail in Section 2, *Project Description*. Additional details on aquatic resources and special-status species in the Open Space VMP Area follow.

STREAMS AND WATER RESOURCES

The Town contains several creeks, ponds, and reservoirs. The natural hydrology of the area has been altered over time due to urban development and flood control infrastructure. Waterways within the Town include a mixture of perennial and ephemeral rivers and creeks, including the Guadalupe River and Los Gatos, Ross, and Smith Creeks. Los Gatos and Smith Creeks flow south to north, the Guadalupe River and Ross Creek flow southwest to northeast, and all drainages in the Open Space VMP Area enter San

Francisco Bay. The Vasona Reservoir is the largest open water habitat within the Town (Town of Los Gatos 2008); however, the reservoir is not within the Open Space VMP Area. Los Gatos Creek is one of the major creeks in the Open Space VMP Area, flowing south to north into and out of the Vasona Reservoir. Santa Rosa Open Space, La Rinconada Park, and Novitiate Park are adjacent to and/or contain ephemeral riparian features. Novitiate Park is bisected by Los Gatos Creek, and Santa Rosa Open Space and La Rinconada Park both contain unnamed water features identified by the National Wetland Inventory (NWI) as stream/river and lake/pond resources.

SPECIAL-STATUS SPECIES

In compliance with SPR BIO-1, SWCA biologists conducted a data review and reconnaissance-level survey in June and July 2020 to identify and document sensitive biological resources within the treatment areas and to assess potential habitat suitability for special-status plants and animals. SWCA biologists documented site conditions throughout the proposed project area.

Special-Status Plant Species

The following special-status plant species have potential to occur or are known to occur within the Open Space VMP Area and are described in more detail in Table 3.

- Loma Prieta hoita (*Hoita strobilina*)
- Most beautiful jewel flower (*Streptanthus albidus*)
- Robust monardella (*Monardella villosa* ssp. *villosa*)
- Western leatherwood (*Dirca occidentalis*)
- Woodland woollythreads (*Monolopia gracilens*)

Special-Status Animal Species

The following special-status animal species have potential to occur or are known to occur within the Open Space VMP Area and are described in more detail in Table 3:

- Western pond turtle (*Emys marmorata*)
- Santa Cruz black salamander (*Aneides flavipunctatus niger*)
- Steelhead (*Oncorhynchus mykiss irideus* pop. 8)
- California red-legged frog (*Rana draytonii*)
- Foothill yellow-legged frog (*Rana boylii*)
- Pallid bat (*Antrozous pallidus*)

Table 3. Species with Potential to Occur in the Project Area

Species Name[1]	General Habitat Description[2]	Legal Status Federal/State/ CRPR Status[3,4]	Rationale for Potential Occurrence
Special-Status Plant Species			
Loma Prieta hoita (*Hoita strobilina*)	Perennial herb endemic to California that occurs in chaparral, cismontane woodland, and riparian woodland. Elevation: 1–95 meters. Blooming period: May–July.	1B.2	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. Six California Natural Diversity Database (CNDDB) occurrences have been recorded (2002, 2009, 2014, 2018) approximately 0.36 mile southwest of the nearest Open Space VMP location.
Most beautiful jewel flower (*Streptanthus albidus*)	Annual herb endemic to California that occurs in chaparral, valley grassland, and foothill woodland habitats. Elevation: 0–207 meters. Blooming period: April–September.	1B.2	**Unlikely to Occur:** Suitable habitat exists in the Open Space VMP Area but is limited to the hills above Lexington Reservoir. Two CNDDB occurrences have been recorded (1995, 2001) approximately 0.3 mile southwest of the nearest Open Space VMP location.
Robust monardella (*Monardella villosa* ssp. *villosa*)	Perennial herb endemic to California that occurs in chaparral and foothill woodland. Elevation: 0–240 meters. Blooming period: June–August.	-	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. No CNDDB occurrences have been recorded in the Open Space VMP Area; however, this species has been identified as known to occur in the *Town of Los Gatos 2040 General Plan*.
Western leatherwood (*Dirca occidentalis*)	Shrub endemic to California that occurs in chaparral, foothill woodland, mixed evergreen forest, closed-cone pine forest, north coastal coniferous forest, and wetland riparian habitat. Elevation: 25–425 meters. Blooming period: January–March (or April).	1B.2	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. No CNDDB occurrences have been recorded in the Open Space VMP Area; however, this species has been identified as known to occur in the Town's General Plan.
Woodland woollythreads (*Monolopia gracilens*)	Annual herb that occurs in broad-leaved upland forest openings, chaparral openings, cismontane woodland, and north coast coniferous forest openings. Elevation: 100–1,200 meters. Blooming period: February–July.	1B.1	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. Three CNDDB occurrences have been recorded (2018) approximately 0.25 mile south of the nearest Open Space VMP location.
Special-Status Wildlife			
Amphibians			
California red-legged frog (*Rana draytonii*)	Inhabits permanent and temporary pools, streams, freshwater seeps, and marshes in lowlands and foothills occurring from sea level to 6,500 feet. Uses adjacent upland habitat for foraging and refuge. Breeds during wet season from December to March. Lays between 300 and 4,000 eggs in a large cluster that are attached to plants near water surface. Eggs hatch after about 4 weeks and undergo metamorphosis in 4 to 7 months.	FT/SSC/--	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. No CNDDB occurrences have been recorded in the Open Space VMP Area; however, this species has been identified as known to occur in the Town's General Plan and has been observed in Los Gatos Creek.

Species Name[1]	General Habitat Description[2]	Legal Status Federal/State/ CRPR Status[3,4]	Rationale for Potential Occurrence
Foothill yellow-legged frog (*Rana boylii*)	Found in or near rocky streams and rivers with open, sunny banks in forest, chaparral, and woodland habitats occurring from sea level to 6,000 feet. Breeds from April to early July in streams or rivers. Lays between 300 to 2,000 eggs in large cluster on downstream side of rocks in slow-moving water. Eggs hatch after 5 to 37 days and undergo metamorphosis in 3 to 4 months.	--/SSC/--	**Potential to Occur:** Suitable habitat exists in the Open Space VMP Area. No CNDDB occurrences have been recorded in the Open Space VMP Area; however, this species has been identified as known to occur in the Town's General Plan.
Santa Cruz black salamander (*Aneides flavipunctatus niger*)	Occurs in mixed deciduous woodland, coniferous forest, and coastal grasslands. Usually found under rocks, near streams, in talus, under damp logs, and in soils along wet streams. Terrestrial species that forage during wet nights and stay underground during dry weather. Breeds between July and August laying between 8 and 25 eggs below ground. May remain streamside year-round.	--/SSC/--	**Unlikely to Occur:** Three CNDDB occurrences (1931, 1973, 1985) have been recorded within 1 mile of the Open Space VMP Area, with no new occurrences recorded. The closest recorded CNDDB occurrence is approximately 0.86 mile south of the nearest Open Space VMP Area along the Lexington Reservoir. The parcels separating the occurrence from the Open Space VMP Area are disked and contain steep terrain.
Fish			
Steelhead – Central California Coast Distinct Population Segment (DPS) (*Oncorhynchus mykiss irideus*)	Occurs in clear, cool water with abundant in-stream cover, well-vegetated stream margins, relatively stable water flow, and 1:1 pool-to-riffle ratio. Requires cool, deep pools with overhead cover to protect from predators.	FT/--/--	**Potential to Occur:** The closest recorded CNDDB occurrence (2017) is approximately 0.1 mile from the nearest roadway. This species has recorded occurrences in Guadalupe Creek, which runs adjacent to Shannon and Hicks Roads, and Los Gatos Creek near Vasona Reservoir, which runs alongside the Santa Cruz Highway adjacent to Novitiate Park. Supporting tributaries include Alamitos, Hicks, and Pheasant Creeks.
Mammals			
Pallid bat (*Antrozous pallidus*)	Occurs in grasslands, shrublands, woodlands, and forests in semi-arid and arid landscapes. Most common in open, dry habitats with rocky outcroppings for roosting. Day roosts in caves, crevices, mines, and hollow trees. Night roosts in open sites such as open buildings. Forages at ground level with open vegetation. Breeds from October to February with litters between one and three.	--/SSC/--	**Potential to Occur:** The closest recorded CNDDB occurrence (2004 is approximately 0.5 mile from the nearest Open Space VMP Area at Santa Rosa Open Space. Suitable habitat occurs on-site. One CNDDB occurrence (2004) was recorded from a nearby roosting site in a barn, which has since been developed and the species removed. Suitable habitat occurs in the Open Space VMP Area, and it is possible that this species could roost and forage within open space areas.

Species Name[1]	General Habitat Description[2]	Legal Status Federal/State/ CRPR Status[3,4]	Rationale for Potential Occurrence
Reptiles			
Western pond turtle *(Emys marmorata)*	Occurs in permanent and intermittent rivers, creeks, small lakes or ponds, marshes, irrigation ditches, and reservoirs. Basks on land, logs, branches, or boulders in and around water. Can migrate more than 0.5 mile. May return to same site each year during overwintering period. Breeds from April to May but can be year-round. Leave aquatic habitat to travel upland to nests and lay eggs. Nests in sandy banks near water or in fields with sunny openings within few hundred feet from water. Forages and feeds in aquatic habitats only.	--/SSC/--	**Potential to Occur:** The closest recorded CNDDB occurrence (2012 is approximately 0.5 mile from the nearest priority roadway and 1.25 miles from La Rinconada Park. Four CNDDB occurrences (1998, 2001) are recorded near the Vasona Reservoir and County Park. Suitable habitat exists near La Rinconada Park at the La Rinconada Country Club in the existing ponds, but the reservoir is separated by two major roadways.

[1] List of plant species based on California Native Plant Society (CNPS) and CNDDB results from searches of Los Gatos, California USGS 7.5-minute quadrangle and the *Town of Los Gatos 2040 General Plan*. List of animal species based on CNDDB searches of the Los Gatos, California USGS 7.5-minute quadrangle and Town's General Plan.

[2] Listing status based on California Department of Fish and Wildlife (CDFW) CNDDB State & Federally Listed Endangered & Threatened Animals of California List (CDFW 2023). Habitat associations and blooming periods based on the Jepson Online Interchange for California Floristics (Jepson 2020). Other sources include CalFish (2020), CAL Herps (2020), Center for Biological Diversity (CBD 2020), Calflora (2020), and CNPS (2020).

[3] Listing status based on CNDDB and CNPS data (queried in July 2020). Status Codes: -- = no status, FT = Federally Listed Threatened, SSC = California Species of Special Concern.

[4] California Rare Plant Ranking: 1B = Plants rare, threatened, or endangered in California and elsewhere
CRPR Threat Ranks: 0.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat); 0.2 = Moderately threatened in California (20-80% of occurrences threatened / moderate degree and immediacy of threat)
Potential for Occurrence Ratings:
Unlikely to Occur. The species is not likely to occur in the VMP Open Space area based on the following considerations: lack of suitable habitat and features that are required to satisfy the life history requirements of the species or presence of invasive species that inhibit survival or occupation.
Potential to Occur. There is a possibility that the species can be found in the VMP area based on the following conditions: the VMP Open Space area falls within the range of the species, suitable habitat is present, but no records of sighting are located within or near (2 miles) the VMP Area, or the records are old and unreliable, and it is undetermined whether the habitat is currently occupied.

IMPACT BIO-1

Proposed treatment and maintenance activities could result in direct or indirect impacts to special-status plant species with suitable habitat within the treatment area. Based on a desktop-level review, there is potential for five special-status plant species to occur in the Open Space VMP Area. These species include Loma Prieta hoita, most beautiful jewel flower, robust monardella, western leatherwood, and woodland woollythreads (California Department of Fish and Wildlife [CDFW] 2022). The proposed project will implement manual and mechanical treatments, grazing or prescribed herbivory, and chemical treatments which, per the PEIR, have the potential to impact special-status plant species that may be present within the project area.

To minimize and/or avoid impacts to special-status plant species, AMM-1, AMM-13, AMM-15, AMM-18, and AMM-33, included in Section 2, *Project Description* (see Table 2), and SPRs BIO-2, BIO-3, BIO-7, and BIO-9, included in the PEIR, would be implemented to reduce potential impacts to special-status plant species or their habitats due to treatment activities. AMM-13, AMM-15, and SPR BIO-7 require surveys for special-status plants be conducted during the appropriate blooming period if they have potential to occur in a proposed treatment area. AMM-13 and SPR BIO-2 require biological resource training for workers to inform them of the presence of special-status plants and the mitigation measures, work practices, and laws and regulations that protect these resources. AMM-1 and SPR BIO-3 require project-specific surveys to identify and map the limits of sensitive natural communities and other sensitive habitats. AMM-18 and SPR BIO-9 require BMPs be implemented to prevent the spread of invasive plants and noxious weeds that could have indirect adverse effects on special-status plants

through competition for resources and habitat degradation. In addition to the SPRs, PEIR MMs BIO-1a through BIO-1c would be implemented as needed to further reduce potentially significant impacts to special-status plant species. If special-status plants are present within the project area, MMs BIO-1a and BIO-1b would require disturbance buffers of a minimum of 50 feet around these species. This area would be marked using high-visibility flagging, stakes, or clear, existing landscape demarcations such as the edge of a roadway. If implementation of MMs BIO-1a and BIO-1b is not possible due to site limitations, MM BIO-1c would require the preparation and implementation of a Compensatory Mitigation Plan that identifies the significant impacts and implementation strategy to mitigate for loss of special-status plants.

The potential for treatment activities to result in adverse effects on special-status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR because the treatment activities and intensity of disturbance from implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status plants is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs, SPRs, and PEIR MMs BIO-1a through BIO-1c, if necessary.

IMPACT BIO-2

The proposed project includes treatment and maintenance activities that could result in direct or indirect impacts to special-status animals with suitable habitat within the treatment area, as described below.

Special-Status Amphibians, Fish, and Reptiles

There is potential for California red-legged frog, foothill yellow-legged frog, Santa Cruz black salamander, Central California Coast steelhead Distinct Population Segment (DPS) pop. 8, and western pond turtle to occur within the proposed project area. Per the PEIR, treatment activities, including manual and mechanical treatments, prescribed herbivory, and herbicide treatment, could affect special-status amphibians and reptiles through habitat modification. AMM-1, AMM-13 through AMM-15, AMM-20, and AMM-24, included in Section 2, *Project Description* (see Table 2), would be implemented to avoid impacts to special-status amphibians and reptiles or their habitat. In addition, SPRs BIO-2 through BIO-5, BIO-10, BIO-11, HAZ-5, HAZ-6, HYD-1, and HYD-4, included in the PEIR, would be implemented to further minimize impacts to special-status amphibians and reptiles. SPR BIO-1 requires a data review and reconnaissance surveys to identify habitat for special-status species and has already been implemented. AMM-13 and SPR BIO-2 requires biological resources training for workers by a qualified biologist to inform them of the presence of special-status wildlife species and the mitigation measures, work practices, and laws and regulations that protect these resources. AMM-15, AMM-16, AMM-24, and SPRs BIO-3 through BIO-5 reduce potential impacts to special-status species through avoidance of their habitat. AMM-16 and SPR BIO-3 require project-specific surveys to identify and map the limits of sensitive natural communities and other sensitive habitats. AMM-24 and SPR BIO-4 require treatments to be designed to avoid loss or degradation of riparian habitat functions and values. AMM-16 and SPR BIO-5 require treatments to avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub habitats. AMM-15 and SPR BIO-10 require surveys for special-status wildlife and nursery sites. AMM-20 and SPR BIO-11 require the installation of wildlife-friendly fencing for prescribed herbivory and the establishment of exclusion zones. AMM-31 and SPR HAZ-5 require the preparation of a Spill Prevention and Response Plan and that a spill kit be kept and maintained on-site. AMM-21 and SPR HYD-1 require the proposed project to comply with all state and regional water quality regulations, including conditions of waste discharge requirement waivers that are applicable to

fuel reduction and fire prevention activities. AMM-1 and SPR HYD-4 require identification and protection of protected resource areas. AMM-30 and SPR HYD-4 require equipment to be fueled and serviced outside of protected resource areas and wet areas that may provide habitat for special-status amphibians, fish, and reptiles. In addition, PEIR MMs BIO-2a and BIO-2b, BIO-3a through BIO-3c, and BIO-4, included in the PEIR, would be implemented, as needed. PEIR MMs BIO-2a and BIO-2b require the avoidance of special-status wildlife species identified as occurring within the project area. PEIR MM BIO-3a would reduce potentially significant impacts on sensitive natural communities and oak woodland habitat which may provide habitat for these species by requiring activities be designed to avoid loss of sensitive natural communities, to the extent feasible. If avoidance of sensitive natural communities is not feasible, PEIR MMs BIO-3b and BIO-3c would require compensation for unavoidable impacts. In addition, PEIR MM BIO-4 would reduce potentially significant impacts on federally and state-protected wetlands that may provide habitat to identified wildlife species by requiring the delineation and avoidance of any wetlands identified within the project area. With the implementation of identified SPRs, AMMs, and MMs, project-specific impacts would be less than significant.

Special-Status Bats

There is potential for pallid bat to occur within the proposed project area. Per the PEIR, treatment activities, including manual and mechanical treatments and herbicide application, conducted in suitable habitat for bats or during the bat maternity season (April 1–August 31) could result in the loss of young or abandonment of roosts from auditory and visual disturbances (e.g., heavy equipment, vehicles, chainsaws, etc.). Suitable habitat for special-status bats is present within the proposed project area.

AMM-13 through AMM-15 and AMM-24, included in Section 2, *Project Description* (see Table 2), and described above would be implemented to avoid impacts to special-status and roosting bats. In addition, SPRs BIO-2 through BIO-5, BIO-10, HAZ-5, and HYD-4 would also be implemented to avoid impacts to special-status bats. PEIR MMs BIO-2a and BIO-2b would also be implemented, as needed. With the implementation of AMMs, SPRs, and MMs, project-specific impacts would be less than significant.

Special-Status, Nesting, and Migratory Birds

No special-status bird species were determined to have potential to occur within the proposed project area. However, the presence of nesting and migratory birds is anticipated to occur. Per the PEIR, treatment activities conducted during the nesting bird season (February 1–August 31) could result in the loss of active nests or disturbance of nests from auditory and visual disturbances (e.g., heavy equipment, vehicles, chainsaws, etc.). In the event that special-status or nesting birds are discovered within the treatment area, a qualified biologist will establish suitable buffers, depending on the species, around nests. Nests would be monitored, and buffers would be maintained until the chicks have fledged as determined by a qualified biologist. AMM-13 through AMM-15 and AMM-24, included in Section 2, *Project Description* (see Table 2), and described above, as well as SPR BIO-10, which protects habitat and nursery sites, and SPR BIO-12, which protects common nesting birds and raptors, would also be implemented. Following implementation of AMMs and SPRs, project-specific impacts would be less than significant.

Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance due to implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and

outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status wildlife is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs, SPRs, and PEIR MMs BIO-2a and BIO-2b, BIO-3a through BIO-3c, and BIO-4, if necessary.

IMPACT BIO-3

Riparian and other sensitive natural communities are present within the proposed project area. Per the PEIR, vegetation treatment activities could result in the loss or degradation of sensitive habitats, including designated sensitive natural communities, riparian habitats, and oak woodlands. Data review and reconnaissance-level surveys of the treatment areas and associated biological resources were conducted in compliance with SPR BIO-1. Sensitive natural communities with potential to occur within the proposed treatment areas were compiled through searches conducted through a California Natural Diversity Database (CNDDB) nine-quadrangle search (CDFW 2022) and cross referenced against Table 3.6-22 (pages 3.6-83–3.6-85), in Volume II of the PEIR, for sensitive natural communities that could occur in the Central California Coast ecoregion. Based on this information, sensitive natural communities with potential to occur in the California Wildfire Habitat Relationship habitat types within the treatment area include oak woodland, chaparral, and riparian woodland. The presence of these habitat types was verified during the reconnaissance-level surveys. Within designated sensitive natural communities, vegetation treatment standards, included in Section 2, *Project Description*, have been established to reduce impacts to these communities.

Riparian habitat is present within the proposed treatment area. Three of the treatment areas—Santa Rosa Open Space, La Rinconada Park, and Novitiate Park—are adjacent to and/or contain ephemeral riparian features. Novitiate Park is bisected by Los Gatos Creek and Santa Rosa Open Space and La Rinconada Park both contain unnamed water features identified by the NWI as stream/river and lake/pond resources. SPR BIO-3 requires site-specific surveys to identify and map the limits of sensitive natural communities and other sensitive habitats using standard field protocols. No ground disturbance or grazing would be allowed in these buffer areas. In addition, prescribed burning is not proposed as a treatment method and no chemical treatments would be permitted adjacent to stream and water resources. The use of herbicides in riparian areas would be limited to those approved in the PEIR, as discussed in Section 4.9 *Hazardous Materials, Public Health, and Safety*, under Impact HAZ-2.

AMMs included in Section 2, *Project Description* (see Table 2), will be implemented to avoid impacts from treatment activities to riparian habitat and other sensitive natural communities. SPRs BIO-2 through BIO-6, BIO-8, BIO-9, and HYD-4, from the PEIR, will be implemented to reduce potential direct and indirect impacts to riparian habitat and sensitive natural communities. SPR BIO-2 requires biological resource training for workers so that they can identify and avoid sensitive natural communities and habitats. AMM-1, AMM-13, AMM-15, and SPR BIO-3 require site-specific surveys to identify and map the limits of sensitive natural communities and other sensitive habitats using standard field protocols. AMM-17, AMM-20, AMM-24 through AMM-28, and SPR BIO-4 require treatments be designed to avoid loss or degradation of riparian habitat functions and values. AMM-16 and SPR BIO-5 require treatments be designed to avoid environmental effects of type conversion of chaparral habitats. AMM-19 and SPR BIO-6 require BMPs be implemented to prevent the spread of plant pathogens. AMM-18 and SPR BIO-9 require BMPs be implemented to prevent the spread of invasive plants and noxious weeds that could degrade the quality of sensitive habitats and sensitive natural communities. SPR HYD-4 requires identification of environmentally sensitive areas, such as aquatic resources.

In addition, implementation of PEIR MM BIO-3a and BIO-4 would reduce potentially significant impacts by requiring treatments to be designed to avoid loss of sensitive natural communities and the delineation of wetlands and waters as well as the establishment of disturbance buffers to avoid impacts to state and/or

federally protected wetlands. If impacts to sensitive natural communities are unavoidable, PEIR MMs BIO-3b and BIO-3c, which require compensation for loss of natural communities, oak woodlands, and unavoidable loos of riparian habitat, would be implemented. However, no unavoidable impacts are anticipated.

The potential for treatment activities to result in adverse effects on riparian habitat or other sensitive natural communities was examined in the PEIR. This impact on riparian habitat or other sensitive natural communities is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on riparian habitat or other sensitive natural communities is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs, SPRs, and PEIR MMs BIO-3a through BIO-3c and BIO-4, if necessary.

IMPACT BIO-4

The U.S. Fish and Wildlife Service (USFWS) NWI database identifies multiple features within the project area (USFWS 2022). The Town contains several creeks, ponds, and reservoirs; however, the natural hydrology of the area has been altered over time due to urban development and flood control infrastructure. Waterways within the Town include a mixture of perennial and ephemeral rivers and creeks, including the Guadalupe River and Los Gatos, Ross, and Smith Creeks. Santa Rosa Open Space, La Rinconada Park, and Novitiate Park are adjacent to and/or contain ephemeral riparian features. Novitiate Park is bisected by Los Gatos Creek and Santa Rosa Open Space and La Rinconada Park both contain unnamed water features identified by NWI as stream/river and lake/pond resources. No NWI waters or wetlands have been mapped within Heintz Open Space and Worcester Park. The presence or absence of waters and wetlands was verified in the field and confirmed NWI features. Treatment activities may occur in riparian areas; however, grazing or prescribed herbivory and chemical treatments will be regulated in riparian areas consistent with the PEIR.

AMM-21 through AMM-37, included in Section 2, *Project Description* (see Table 2), will be implemented to avoid impacts from treatment activities to aquatic resources and riparian areas and reduce the potential for erosion or hazardous spills in sensitive habitat areas. SPRs BIO-1 and HYD-1, HYD-3, and HYD-4, from the PEIR, will be implemented to identify potential resources on-site and protect water quality. In addition, implementation of PEIR MM BIO-4 would reduce potentially significant impacts by requiring the delineation of wetlands and waters as well as the establishment of disturbance buffers to avoid impacts to federally and/or state-protected wetlands.

The potential for treatment activities to result in adverse effects on federally or state-protected wetlands was examined in the PEIR. This impact on protected wetlands is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on federally and state-protected wetlands is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs, SPRs, and PEIR MM BIO-4.

IMPACT BIO-5

The project area consists of five distinct undeveloped parks and open space areas within the Town with varying degrees of wildlife connectivity. La Rinconada and Worcester Parks are located in dense urban areas surrounded primarily by residential uses. Santa Rosa and Heintz Open Space Areas and Novitiate Park have connectivity to adjacent open space areas and likely experience greater use from terrestrial species. The PEIR recognizes that treatment activities, including those that generate noise, temporary fencing for prescribed herbivory, and other disturbances, may cause temporary changes to wildlife movement and potentially disrupt nursery sites. In addition, treatment activities that remove cover and impact habitat structures could result in long-term effects that may result in habitat loss or degradation. However, no known wildlife nursery sites were identified during the implementation of SPR BIO-1.

Implementation of AMM-21 through AMM-37, included in Section 2, *Project Description* (see Table 2), will reduce impacts to wildlife movement corridors and nurseries by avoiding work in sensitive habitat areas. Additionally, implementing vegetation management standards included in Section 2, *Project Description*, ensures vegetation retention for wildlife. SPRs HYD-1, HYD-4, BIO-1, BIO-4, BIO-5, and BIO-10 through BIO-12 will be implemented to reduce potential impacts to aquatic and riparian habitat; see Impacts BIO-1 through BIO-4 for detailed descriptions of these SPRs and AMMs. Wildlife nurseries could be impacted if the habitats or areas where these nurseries occur are in habitats that are not covered in the SPRs. If nursery sites are identified in areas not included in the SPRs, the PEIR requires that PEIR MM BIO-5 be implemented to retain nursery habitat and implement buffers to avoid nursery sites. Nursery sites, if present, should be identified through the implementation of SPR BIO-10.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and the impeded use of nurseries was examined in the PEIR. This impact on wildlife movement and nurseries is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wildlife movement corridors and nurseries is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs, SPRs, and PEIR MM BIO-5, if necessary.

IMPACT BIO-6

The proposed project would include treatment methods that could result in the reduction of habitat or abundance of common wildlife, including nesting birds, due to the presence of suitable habitat throughout the project area. Proposed treatment activities conducted during the nesting bird season could result in the loss or disturbance of active nests due to noise impacts and could potentially result in abandonment and loss of chicks.

Treatment activities would include the removal of vegetation, dead trees, and woody debris to reduce fuel loads and fire risk within the Town. However, focused nesting bird surveys would be conducted prior to the implementation of treatment activities in accordance with the AMMs and SPRs. AMM-13, included in Section 2, *Project Description* (see Table 2), would provide protection of nesting birds in congruence with the Migratory Bird Treaty Act. AMM-13 through AMM-15 require a qualified biologist to conduct surveys for special-status species, to conduct environmental awareness training for crew members, and establish protocols for special-status species encounters. AMM-24 requires that treatments in riparian habitat be designed to retain or improve habitat functions. Additionally, AMM-20 and AMM-33 also

provide exclusion areas and treatment standards for sensitive habitat areas to protect long-term habitat for wildlife.

In addition to the AMMs above which provide protection for wildlife and their habitat, and provide exclusion areas, SPRs BIO-1 through BIO-5 and BIO-12 would be implemented to reduce impacts to less than significant. SPRs BIO-1 through BIO-5 limit the loss or degradation of high-quality breeding habitats for special-status wildlife that would also benefit common species and protect sensitive natural communities, including wetland and riparian habitat. SPR BIO-12 provides protection for common nesting birds and raptors, if treatment activities need to occur during the nesting season, by requiring pre-treatment nesting bird surveys and implementation of feasible impact avoidance strategies, including protective buffers, treatment modifications, and raptor nest monitoring. Overall, proposed treatments are occurring within small portions of species' overall habitat range and would not substantially reduce the overall abundance of any common wildlife.

The potential for treatment activities to result in adverse effects on the reduction of habitat or abundance of common wildlife was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on common wildlife, including nesting birds, is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate AMMs and SPRs.

IMPACT BIO-7

The proposed project is compliant with the *Town of Los Gatos 2040 General Plan Open Space, Parks, and Recreation Element* (Element 7) and *Environment and Sustainability Element* (Element 8), which require the protection of biological and water resources, including special-status species, sensitive habitat communities, and aquatic resources. AMM-13 through AMM-33, discussed in Impacts BIO-1 through BIO-6, would be implemented to protect and reduce impacts to special-status species, sensitive habitat communities, and aquatic resources. SPR AD-3 would be implemented to ensure consistency with local plans, policies, and ordinances, as applicable to the proposed project. In addition, SPR AD-3, which requires that the project proponent design and implement the treatment in a manner that is consistent with applicable local plans, policies, and ordinances to the applicable extent, would be implemented to provide additional protection for special-status species, sensitive biological habitats, and aquatic resources, consistent with the Town's General Plan. Further, SPRs BIO-1 through BIO-12, HYD-1, HYD-4, and HAZ-5 and PEIR MMs BIO-2a through BIO-2b, BIO-3a through BIO-3c, BIO-4, and BIO-5, identified in Impacts BIO-1 through BIO-6, would be implemented to further protect special-status species, riparian areas, and water resources, which is consistent with the Town's General Plan. With implementation of AMMs, SPRs, and MMs, project-specific impacts would be less than significant, which is consistent with the determination of the PEIR.

The potential for treatment activities to comply with local policies or ordinances protecting biological resources was examined in the PEIR. This impact on biological resources is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside

the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on biological resources from conflicts with local policies or ordinances is also the same, as described above. Therefore, no new or severe impacts would occur, and impacts related to project activities would be less than significant with the implementation of appropriate SPRs.

IMPACT BIO-8

The implementation of the proposed project and treatment activities would not conflict with adopted habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) because the treatment area is not within an adopted HCP or NCCP. Therefore, project-specific impacts would be less than significant and would not result in any new or more severe impacts.

NEW BIOLOGICAL RESOURCES IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.6.1, *Regulatory Setting*, and Section 3.6.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to biological resources would occur.

4.6 Geology, Soils, Paleontology, and Mineral Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1 pages 3.7-27 to 3.7-30	Yes	GEO-1/ AMM-34 GEO-2/ AMM-36 GEO-3 GEO-4 GEO-5 GEO-7/ AMM-37 GEO-8/ AMM-35 AD-3 HYD-4 AQ-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2 pages 3.7-30 to 3.7-31	Yes	GEO-3 GEO-4 GEO-7/ AMM-37 GEO-8/ AMM-35	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Geology, Soils, Paleontology, and Mineral Resources Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT GEO-1

The proposed project includes grazing or prescribed herbivory, mechanical, manual, and herbicide treatments over 193.91 acres in the Town of Los Gatos within Santa Clara County. Treatment activities would occur on a phased schedule throughout the year. The proposed treatment areas include five

managed open space and undeveloped park areas. Per the PEIR, these treatment activities have the potential to cause soil disturbance, increased runoff, increased fluvial erosion, increased mass wasting, and impacts to water quality. The reduction or removal of vegetation has the potential to result in short-term erosion or loss of topsoil. However, the proposed project does not include treatment activities such as prescribed burns, which could cause water repellency or non-shaded fuelbreaks, that would result in the removal of all vegetation, and would retain vegetation to the greatest possible extent. Consistent with the PEIR, SPRs GEO-1 through GEO-8, AQ-4, and HYD-4, as well as AMM-35 through AMM-37, would be implemented to further prevent or reduce potential impacts to soil and topsoil during treatment activities. In addition, SPR AD-3 requires consistency with local plans, policies, and ordinances with respect to all treatment activities and maintenance. With the implementation of AMMs and SPRs, project impacts would be less than significant, consistent with the PEIR, and no new or more severe significant impacts would occur as a result of proposed activities.

IMPACT GEO-2

No steep slopes occur in the treatment areas and prescribed burns are not included as a treatment method for this project. The proposed treatment areas vary between gently to moderately sloped. Treatment activities would reduce and remove vegetation in moderately sloped areas, which has the potential to increase the risk of landslides if treatments affect the vegetation root structure, reducing soil water uptake and transpiration which can cause the water content in the slopes to destabilize and increase the chance of a landslide. Vegetation management and maintenance standards, as discussed in Section 2.3.5, *Vegetation Management and Maintenance Standards and Areas*, will be implemented to reduce the risk of landslides caused by treatment activities. Aside from specific invasive species, roots will be left in place, to the maximum extent possible, to support soil structure. In addition, consistent with the PEIR, SPRs GEO-3, GEO-4, GEO-7, and GEO-8, as well as AMM-35 and AMM-37, would be implemented to prevent landslides. With the implementation of vegetation management and maintenance standards, AMMs, and SPRs, project impacts would be less than significant, consistent with the PEIR, and no new or more severe significant impacts would occur as a result of proposed activities

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.7.1, *Regulatory Setting*, and Section 3.7.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology, soils, paleontology, and mineral resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to geology, soils, paleontology, and mineral resources would occur.

4.7 Greenhouse Gas Emissions

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1 pages 3.8-10 to 3.8-11	Yes	None	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2 pages 3.8-11 to 3.18-17	Yes	None	NA	SU	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Greenhouse Gas Emissions Impacts: Would the treatment result in other impacts to greenhouse gas emissions that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT GHG-1

The overall goal of the CalVTP is to reduce the risk of wildfire, which would likely result in greenhouse gas (GHG) emissions caused by large wildfire events and would increase long-term carbon sequestration through the preservation of trees. Fuel reduction treatments that were evaluated in the PEIR were determined to be consistent with California's *2017 Climate Change Scoping Plan* (2017 Scoping Plan), *California Forest Carbon Plan*, and *Draft California 2030 Natural and Working Lands Climate Change Implementation Plan* (CARB 2017; 2018; 2019). These plans acknowledge the importance of fuel reduction treatments in managing natural and working lands to reduce long-term GHG emissions. Project-specific fuel reduction treatments for the proposed project would not include prescribed burns and would be consistent with the fuel reduction treatments evaluated in the PEIR; therefore, as evaluated in the PEIR, short-term GHG emissions from equipment and vehicle use are anticipated to be offset by the long-term benefits of reducing wildfire risk within the state. The proposed project would be consistent with the analysis of the PEIR and would not conflict with applicable GHG reduction plans, regulations, or

policies; therefore, project-specific impacts would be less than significant, which is consistent with the impact determination included in the PEIR. Therefore, no new or more severe significant impacts would occur as a result of proposed activities.

IMPACT GHG-2

Proposed manual and mechanical treatment activities would result in GHG emissions generated by the use of on- and off-road vehicles and equipment (e.g., masticators, chippers, bulldozers, etc.), machine-powered hand tools (e.g., chainsaws), and crew and equipment transportation. Consistent with the PEIR, treatment activities implemented under the proposed project would result in GHG emissions directly generated by equipment, vehicles, and hauling of equipment and materials associated with manual and mechanical treatment activities. However, unlike under the CalVTP, no prescribed burning, which results in substantially more GHG emissions than manual or mechanical treatments, would occur under the proposed project. PEIR MM GHG-2 would not be applicable to the proposed project because it requires GHG emissions reduction techniques to be implemented during prescribed burning, which is not a proposed treatment activity. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. In addition, the intent of the proposed vegetation treatments is to reduce wildfire risk and GHG emissions related to wildfire. The proposed project encompasses a much smaller treatment area and would not include prescribed burns; therefore, the proposed project would generate a substantially reduced amount of GHG emissions compared to what was evaluated in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. Within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW GREENHOUSE GAS EMISSIONS IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.8.1, *Regulatory Setting*, and Section 3.8.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to GHGs present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to GHG emissions would occur.

4.8 Energy Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1 pages 3.9-7 to 3.9-8	Yes	NA	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Energy Resources Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT ENG-1

As described in the PEIR, proposed treatment activities would result in the short-term consumption of energy resources in the form of gasoline, diesel, and fuels during the use of heavy-duty vehicles and equipment and crew transportation to and from the site. Long-term impacts related to energy consumption would likely be beneficial because proposed treatment activities would reduce the threat of large-scale wildfire events that would require immediate emergency response personnel and vehicle mobilization. Consistent with the PEIR, treatment activities would require the short-term consumption of energy resources; however, by reducing wildfire risk, the inefficient use of energy resources during catastrophic wildfire events could also be reduced. Proposed treatment activities are consistent with the equipment and treatment types included in the PEIR. Therefore, the proposed project is consistent with the determination of the PEIR, and project-specific impacts would be less than significant.

NEW ENERGY RESOURCES IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, *Regulatory Setting*, and Section 3.9.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the

geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to energy use present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to energy would occur.

4.9 Hazardous Materials, Public Health, and Safety

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1 pages 3.10-14 to 3.10-15	Yes	HAZ-1 HAZ-5/ AMM-31 HYD-4/ AMM-1, AMM-30	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2 pages 3.10-15 to 3.10-18	Yes	HAZ-5/ AMM-31 HAZ-6 HAZ-7 HAZ-8 HAZ-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	LTSM	Impact HAZ-3 pages 3.10-18 to 3.10-19	Yes	NA	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Hazardous Materials, Public Health, and Safety Impacts: Would the treatment result in other impacts to hazardous materials, public health, and safety that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT HAZ-1

Consistent with the PEIR, certain treatment activities require the use of vehicles and equipment that require fuels, oils, and lubricants to function. The use of these materials has the potential to result in accidental exposure to hazardous materials that may cause health hazards. AMM-1, AMM-30, and AMM-31, included in Section 2, *Project Description* (see Table 2), would reduce the potential for hazardous materials to enter environmentally sensitive areas, prevent accidental spills, and implement a spill response plan in case of spills. The proposed project would also implement SPR HAZ-1, which

requires routine maintenance on all equipment; SPR HAZ-2, which requires all mechanized equipment to be equipped with spark arrestors; SPR HAZ-3, which requires crews to carry one fire extinguisher per chainsaw used; and SPR HAZ-4, which prohibits smoking in vegetated areas. A Spill Prevention and Response Plan consistent with SPR HAZ-5 would also be implemented and a spill kit would be kept on-site. In addition, the proposed project would be subject to state rules and regulations, including the Hazardous Waste Control Act (HWCA), California Department of Toxic Substance Control (DTSC), California Division of Occupational Health and Safety Administration (Cal/OSHA), and California Environmental Protection Agency (CalEPA) regulations for the use, transport, storage, and disposal of hazardous materials. Project impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

IMPACT HAZ-2

Per the PEIR, herbicide application requires increased transportation, use, storage, and disposal of herbicides, which could result in risks related to human exposure when applied near public areas or if accidental spills occur. The proposed project includes the optional, as-needed use of herbicides as a treatment option to remove target vegetation. Herbicides proposed are consistent with those analyzed in the PEIR and include borax (tetraborate decahydrate), clopyralid (monethanolamine salt), glyphosate (ispropylamine salt, potassium salt, dimethylamine salt, diammonium salt), hexazinone, imazapyr (isopropylamine salt), sulfometron methyl, triclopyr (butoxyethyl ester and triethylamine salt), nonylphenol 9 ethoxylates (NP9E), cleantraxx (penoxsulam and oxyfluorfen), valpar (hexazinone), and indaziflam.

Certification is required to apply herbicides in the State of California through the California Department of Pesticide Regulation and requires the certified party to obtain appropriate PPE, including, but not limited to, masks or respirators, safety goggles, gloves, protective clothing, hard hats, and boots. Herbicide treatments would be performed in accordance with federal and state regulations and conducted by a licensed Pest Control Advisor. In addition, the proposed project would limit the use and type of herbicides and restrict treatment in areas adjacent to the public and environmentally sensitive areas, consistent with the PEIR. AMM-31, included in Section 2, *Project Description* (see Table 2), would reduce potential health hazards that could result from the use of herbicides by requiring hand application of herbicides and limiting herbicide use adjacent to sensitive environmental areas including, waters and wetlands. In addition, the proposed project would implement SPRs HAZ-5 through HAZ-9, from the PEIR. AMM-31 and SPR HAZ-5 require the preparation of a Spill Prevention and Response Plan and that a spill kit be kept and maintained on-site. SPR HAZ-6 requires compliance with herbicide application regulations, including coordinating pesticide use with the applicable County Agricultural Commissioner(s) and obtaining all required licenses and permits. SPR HAZ-7 requires that herbicide containers be triple rinsed with clean water at an approved site and disposed of by placing it in a batch tank. SPR HAZ-8 requires minimization of herbicide drift to public areas during herbicide application, and SPR HAZ-9 requires the public be notified of herbicide use prior to applications in areas adjacent to public areas (e.g., recreation areas, residential areas, schools, etc.) within 500 feet. Project impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

IMPACT HAZ-3

Mechanical treatments have the potential to cause soil disturbance and may expose workers, members of the public, and the environment to hazardous materials in the treatment areas. Mechanical treatments would be implemented as part of the project, however, there are no hazardous material sites within the proposed treatment areas (DTSC 2022; Regional Water Quality Control Board [RWQCB] 2022). Project impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH, AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.10.1, *Regulatory Setting*, and Section 3.10.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials, public health, and safety present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to hazardous materials, public health, and safety would occur.

4.10 Hydrology and Water Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1 pages 3.11-25 to 3.11-27	No	--	--	--	--	--
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2 pages 3.11-27 to 3.11-29	Yes	BIO-1 HYD-1/ AMM-21 HYD-4/ AMM-1, AMM-30 GEO-1/ AMM-34 GEO-2/ AMM-36 GEO-3/ AMM-35 GEO-4/ AMM-37 GEO-7 HAZ-1 HAZ-5/ AMM-31 AMM-21 AMM-41	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3 page 3.11-29	Yes	HYD-3 AMM-33	NA	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4 pages 3.11-29 to 3.11-31	Yes	BIO-4/ AMM-25 HYD-5 HAZ-5/ AMM-31 HAZ-6/ AMM-27 HAZ-7 AMM-26	NA	LTS	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5 page 3.11-31	Yes	HYD-1/ AMM-21 HYD-4/ AMM-1, AMM-30 HYD-6 GEO-1/ AMM-34 GEO-2	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT HYD-1

The proposed project does not include prescribed burning. Therefore, this impact does not apply to the proposed project.

IMPACT HYD-2

The proposed project includes manual and mechanical vegetation treatments over approximately 193.91 acres within open space areas and undeveloped park areas. Consistent with the PEIR, these treatment

activities would result in ground disturbance and may cause soil erosion. Disturbed soil could enter environmentally sensitive areas, including adjacent watercourses. In addition, fuel required for the use and operation of mechanical equipment and transport of manual equipment could potentially enter watercourses and degrade water quality through accidental spills. The proposed project would implement AMMs included in Section 2, *Project Description* (see Table 2), during treatment activities to reduce the potential for erosion, runoff, and accidental spills, and to avoid impacts to environmentally sensitive areas, such as aquatic habitat. In addition, the proposed project would also implement SPRs included in the PEIR to reduce impacts to watercourses from erosion and runoff. SPR BIO-1 requires a qualified biologist to conduct a data review and reconnaissance-level surveys within proposed treatment areas in order to identify and document sensitive resources, including riparian habitat, wetlands, and special-status species habitat and establish an avoidance buffer area to protect resources during project activities. AMM-34 and AMM-36 and SPRs GEO-1 and GEO-2 limit ground disturbance during precipitation or heavy equipment operation over saturated soils, when such activities could produce ruts and runoff could concentrate. AMM-37 and SPR GEO-3 requires highly disturbed areas be stabilized with mulch and SPR GEO-4 requires treatment areas to be inspected for erosion prior to and following the first large rainfall event. AMM-35 and SPRs GEO-7 and GEO-8 would limit equipment operation on steep or unstable slopes to reduce the potential for erosion. AMM-21 and SPR HYD-1 require the proposed project to comply with all state and regional water quality regulations, including conditions of waste discharge requirement waivers that are applicable to fuel reduction and fire prevention activities. AMM-30 and SPR HYD-4 require equipment to be fueled and serviced outside of environmentally sensitive areas. AMM-41 and SPR HAZ-1 require all equipment to be maintained and regularly inspected for leaks. AMM-31 and SPR HAZ-5 require the preparation of a Spill Prevention and Response Plan and that a spill kit be kept and maintained on-site. Implementation of AMMs and SPRs would reduce the potential for erosion, runoff, and/or accidental spills into adjacent environmentally sensitive areas. Therefore, project-specific impacts would be less than significant, consistent with the PEIR, and would not result in any new or more severe impacts.

IMPACT HYD-3

The proposed project includes grazing/prescribed herbivory as a treatment method. The use of prescribed herbivory has potential to impact water quality, especially in riparian areas where livestock tend to congregate. Consistent with the PEIR, the proposed project would require a grazing management plan to be prepared and exclusion fencing to be installed to prevent impacts to water quality as a result of grazing activities. The proposed project would implement AMM-33, included in Section 2, *Project Description* (see Table 2), to prevent grazing in environmentally sensitive areas and reduce the risk of substantial degradation to surface or groundwater quality from prescribed herbivory. AMM-33 and SPR HYD-3 exclude grazing in sensitive areas, require livestock movement if erosion is observed, require alternative water sources, and limit stream access points and crossings, which would avoid and minimize water quality degradation and be implemented to further minimize potential impacts to surface or groundwater quality. Therefore, project-specific impacts would be less than significant, consistent with the PEIR, and would not result in any new or more severe impacts.

IMPACT HYD-4

As discussed in Section 4.9, *Hazardous Materials, Public Health, and Safety*, the proposed project includes the optional, as-needed use of herbicides as a treatment option to remove target vegetation. Herbicides proposed are consistent with those analyzed in the PEIR and include borax (tetraborate decahydrate), clopyralid (monethanolamine salt), glyphosate (ispropylamine salt, potassium salt, dimethylamine salt, diammonium salt), hexazinone, imazapyr (isopropylamine salt), sulfometron methyl, triclopyr (butoxyethyl ester and triethylamine salt), nonylphenol 9 ethoxylates (NP9E), cleantraxx (penoxsulam and oxyfluorfen), valpar (hexazinone), and indaziflam. Per the PEIR, the use of herbicides

has the potential to impact water quality through off-site movement of herbicides from runoff, leaching, drift, and misapplication or spills. Other factors, including site conditions, chemical characteristics, and application techniques, increase the likelihood of an herbicide to degrade water quality.

Certification is required to apply herbicides in the State of California through the California Department of Pesticide Regulation and requires the certified party to obtain appropriate PPE, including, but not limited to, masks or respirators, safety goggles, gloves, protective clothing, hard hats, and boots. Herbicide treatments would be performed in accordance with federal and state regulations and conducted by a licensed Pest Control Advisor. In addition, the proposed project would limit the use and type of herbicides and restrict treatment in environmentally sensitive areas, consistent with the PEIR. AMM-25 through AMM-27 and AMM-31, included in Section 2, *Project Description* (see Table 2), would reduce and minimize the risk of impacts to surface or groundwater quality from herbicide application.

In addition, the proposed project would also implement SPRs from the PEIR, including SPR BIO-4, SPR HAZ-5 through 7, and SPR HYD-5 to further reduce the risk of substantial degradation to surface or groundwater quality from herbicide application. SPR HYD-5 prohibits spray application of herbicides when wind speeds are 7 miles per hour or greater and prohibits herbicide application within 50 feet of surface waters or wet meadows for non-aquatic formulations. AMM-25 and SPRs HYD-5 and BIO-4 allow only hand application of herbicides in riparian areas. AMM-26 requires herbicide application to occur outside of the wet season. AMM-31 and SPR HAZ-5 require the preparation of a Spill Prevention and Response Plan and that a spill kit be kept and maintained on-site. AMM-27 and SPR HAZ-6 require compliance with herbicide application regulations, including coordinating pesticide use with the applicable County Agricultural Commissioner(s) and obtaining all required licenses and permits. SPR HAZ-7 requires that herbicide containers be triple rinsed with clean water at an approved site and disposed of by placing it in a batch tank to protect water resources. Therefore, project-specific impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

IMPACT HYD-5

Consistent with the PEIR, the proposed project includes ground-disturbing treatment activities that could intersect existing drainage infrastructure at treatment locations. The proposed project does not include non-shaded fuel breaks, but includes a combination of manual, mechanical, and prescribed herbivory treatment methods over 193.91 acres within the Open Space VMP Area, which have the potential to temporarily disturb existing drainage patterns within the project area. Consistent with the PEIR, prescribed herbivory, and most methods of mechanical treatments, would have minor effects on site drainage. The implementation of AMMs, included in Section 2, *Project Description* (see Table 2), and SPRs, included in Impacts HYD-2 through HYD-4, would reduce impacts to existing drainages in the treatment areas. Therefore, project-specific impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.11.1, *Regulatory Setting*, and Section 3.11.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape;

therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to hydrology and water quality would occur.

4.11 Land Use and Planning, Population and Housing

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1 pages 3.12-13 to 3.12-14	Yes	AD-3	NA	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2 pages 3.12-14 to 3.12-15	Yes	NA	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
☐	☐	☐

Discussion

IMPACT LU-1

The project area encompasses approximately 193.91 acres of parks and open space within the Town of Los Gatos. SPR AD-3, included in the PEIR, requires proposed projects to be consistent with applicable local plans, policies, and ordinances. Applicable local plans, policies, and ordinances include the *Town of Los Gatos 2040 General Plan* (Town of Los Gatos 2022a), *Town of Los Gatos Municipal Code, Los Gatos Hillside Specific Plan* (Town of Los Gatos 1978), *Town of Los Gatos Tree Protection Ordinance* (Town of Los Gatos 2022b), and *Santa Clara County Fire Department Road Standards* (SCCFD 2009; 2020a; 2020b). These plans require the protection of biological resources, water resources, air quality, and other environmental resources. In addition, the *Town of Los Gatos 2040 General Plan Hazards and Safety Element* (Element 9) identifies the need to protect the community from potential threats, including wildfire (Town of Los Gatos 2022a). The proposed project includes AMMs (see Section 2, *Project Description* [see Table 2]) to reduce potential impacts related to air quality, special-status species and other biological resources, soil stability, and water resources. Consistent with the analysis of the PEIR, implementation of AMMs, SPRs, and MMs included in each resource section would avoid or reduce impacts and ensure consistency with applicable local plans, policies, and regulations. Additionally, the

proposed project would reduce the risk for wildfire to occur, which is consistent with the *Hazards and Safety Element* (Element 9). Since AMMs, SPRs, and MMs are required to be implemented in individual resource sections, the proposed project would have less-than-significant impacts related to land use and planning; therefore, the proposed project would be consistent with the evaluation and determination included in the PEIR, and no new or more significant environmental impacts would occur.

IMPACT LU-2

Due to the relatively small geographical scope of the PEIR, it is anticipated that the increase in proposed vegetation treatments would be unlikely to generate new employment opportunities that could marginally increase population growth in the project area. The proposed project is expected to include less than 10 crew members per treatment area to conduct proposed vegetation treatments over approximately 193.91 acres of parks and open space within the Town of Los Gatos. Therefore, the proposed project would only result in short-term increases in the demand for workers, which is within the scope of the PEIR. The proposed project would not result in a substantial population increase and impacts would be less than significant. Therefore, project-specific impacts would be consistent with the analysis and determination of the PEIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.12.1, *Regulatory Setting*, and Section 3.4.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to land use and planning present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to land use and planning would occur.

4.12 Noise

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1 pages 3.13-9 to 3.13-12 Appendix NOI-1	Yes	AD-3/ AMM-38 NOI-1 NOI-2/ AMM-39 NOI-3 NOI-4 NOI-5/ AMM-6 NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated Single-Event Noise Levels During Treatment Activities	LTS	Impact NOI-2 page 3.13-12	Yes	NOI-1	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT NOI-1

Vehicle and equipment use for proposed vegetation treatment activities have the potential to increase ambient noise levels within the vicinity of proposed treatment areas. SPR AD-3 included in the PEIR requires proposed projects to be consistent with local plans, policies, and ordinances. The Town of Los Gatos Code of Ordinances (Section 16.20.035) prohibits construction noise between the hours of 6:00 p.m. and 8:00 a.m. on weekdays and 4:00 p.m. and 9:00 a.m. on Saturdays, and any time on Sundays. Under AMM-38, included in Section 2, *Project Description* (see Table 2), proposed vegetation treatments would be limited to the hours in the Noise Ordinance. The Noise chapter on the *Town of Los Gatos 2040 General Plan Environment and Sustainability Element* (Chapter 8.11) includes policies and

implementation measures to ensure that equipment noise does not adversely affect land uses and to actively enforce noise standards. Proposed vegetation treatments would occur in public parks and open space areas. However, noise generated by proposed treatments would be temporary, would be intermittent, and would not create a new permanent source of noise in the area, which is consistent with the Noise Chapter of the *Environment and Sustainability Element* (Chapter 8.11). Additionally, the proposed project would be subject to noise-specific SPRs included in the PEIR and project AMMS to reduce short-term increases in ambient noise levels. SPR NOI-1 restricts vegetation treatment activities to daytime hours. SPR NOI-2 and AMM-39 require all equipment to be maintained appropriately and equipped with the proper intake and exhaust shrouds. SPR NOI-3 requires all equipment engine shrouds to be closed during operation. SPR NOI-4 would require vegetation treatment activities and staging areas be located away from sensitive receptors to the extent feasible to minimize noise exposure. SPR NOI-5 and AMM-6 restrict equipment idling time. Additionally, SPR NOI-6 requires notification to be provided to nearby sensitive receptors when heavy equipment would be used for a treatment. With implementation of required SPRs and AMMs, the proposed project would have a less-than-significant impact related to increases in ambient noise and would be consistent with the determination of the PEIR.

IMPACT NOI-2

As described in the PEIR, single event (impulsive) noise level (SENL) describes a receiver's cumulative noise exposure from a single impulsive noise event (e.g., an automobile passing by, an aircraft flying overhead). The proposed project has the potential to increase SENL within proposed treatment areas through heavy equipment and vehicle trips. SPR NOI-1, included in the PEIR, would be implemented to restrict vegetation treatment activities to daytime hours, which would reduce the potential for an increase in heavy vehicle and equipment trips to increase SENLs during noise-sensitive evening and nighttime hours. The increase in heavy vehicle and equipment trips would be temporary and would not result in a permanent increase in trips along public roadways. The proposed project would be consistent with the PEIR because vehicle and equipment trips would be limited to daylight hours and would not result in a long-term increase in SENL. Therefore, project-specific impacts would be less than significant, and no new or more severe impacts than what was evaluated in the PEIR would occur.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.13.1, *Regulatory Setting*, and Section 3.13.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to noise would occur.

4.13 Recreation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pages 3.14-6 to 3.14-7	Yes	REC-1	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT REC-1

Consistent with the PEIR, the proposed project could result in potential conflicts with recreationists and recreation areas. The proposed project includes treatment activities across 193.91 acres within five open space areas and undeveloped park areas. Therefore, proposed treatment activities could result in conflicts with recreationists including access restrictions or nuisance impacts such as degradation of views, dust emissions, and increased traffic. SPR REC-1, included in the PEIR, would be implemented to minimize recreational nuisances that could result due to treatment activities. SPR REC-1 requires the project proponent to notify the public before the implementation of treatment activities. Potential nuisance impacts would be temporary and would not result in long-term disruption or conflicts with recreational land uses. Therefore, project-specific impacts would be less than significant, consistent with the PEIR, and would not result in any new or more severe impacts.

NEW RECREATION IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.14.1, *Regulatory Setting*, and Section 3.14.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of

land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to recreation present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to recreation would occur.

4.14 Transportation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Impact TRAN-1 pages 3.15-9 to 3.15-10	Yes	AD-3 TRAN-1 AMM-40	NA	LTS	No	YES
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pages 3.15-10 to 3.15-11	Yes	AD-3 TRAN-1 AMM-40	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pages 3.15-11 to 3.15-13	Yes	NA	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT TRAN-1

The *Town of Los Gatos 2040 General Plan Mobility Element* (Element 5) evaluates existing roadway conditions using levels of service (LOS), which are categorized according to the flow of traffic. Within the Town, LOS D is considered an acceptable LOS (Town of Los Gatos 2022a). There are several state and county roadways that traverse the Town in the vicinity of the treatment areas, including, but not limited to, SR-17 and SR-9, in addition to local roadways. In addition, there are numerous local roadways located within the project area.

The proposed project has the potential to slow the flow of traffic through an increase of heavy vehicles and equipment traveling on nearby roadways and through implementation of temporary traffic controls. AMM-40, included in Section 2, *Project Description* (see Table 2), would require the project to prepare and implement a Traffic Control Plan in order to coordinate with nearby land uses in regard to potential road closures or other necessary controls. Temporary traffic controls on public roadways would be subject to SPR TRAN-1, included in the PEIR, which requires coordination with local agencies to develop a traffic management plan as necessary. In addition, vehicle and equipment transportation would be temporary and would not permanently impede the flow of traffic on public roadways. The proposed project would be consistent with SPR AD-3 because it would be consistent with the *Town of Los Gatos 2040 General Plan Mobility Element* (Element 5). Therefore, project-specific impacts would be less than significant, which is consistent with the analysis and determination included in the PEIR.

IMPACT TRAN-2

The proposed project does not include the construction of any new roads; therefore, the proposed project would not substantially increase hazards due to hazardous road design. The PEIR also identifies an increase in congestion as a potential roadway hazard. AMM-40, included in Section 2, *Project Description* (see Table 2), would require preparation of a Traffic Control Plan to foster coordination with nearby land uses in regard to potential road closures or other necessary controls. Temporary traffic controls would be subject to SPR TRAN-1 to avoid unnecessary hazards associated with implementation of traffic controls. Additionally, the proposed project would be consistent with SPR AD-3 because traffic controls are not anticipated to increase long-term congestion along public roadways. Therefore, project-specific impacts would be less than significant and would not constitute a new or more severe impact than what was evaluated in the PEIR.

IMPACT TRAN-3

According to the *Technical Advisory on Evaluating Transportation Impacts in CEQA*, projects that do not indicate substantial evidence that a project would generate a potentially significant level of vehicle miles traveled (VMT), that are consistent with a Sustainable Communities Strategy (SCS) or general plan, or that would generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact (California Governor's Office of Planning and Research [OPR] 2018). One to three vehicles per treatment area would be used for crew transportation to proposed treatment areas. Although there is potential for concurrent treatment activities to occur, vehicle and equipment trips would be temporary and the project is not anticipated to result in more than 110 trips per day; therefore, project-specific impacts related to VMT would be less than significant. The PEIR evaluates the potential impacts of an increase in vegetation treatments throughout the state; therefore, this impact area was identified as having a potentially significant and unavoidable impact related to VMT. The PEIR also notes that individual treatment projects are reasonably expected to generate less than 110 trips per day, which is consistent with the determination of the proposed project. Project-specific impacts would be less than significant; therefore, the proposed project would not result in any new or more severe impacts than what was included in the PEIR.

NEW TRANSPORTATION IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.15.1, *Regulatory Setting*, and Section 3.15.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the

existing environmental and regulatory conditions pertinent to transportation present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to transportation would occur.

4.15 Public Services, Utilities, and Service Systems

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Impact UTIL-1 page 3.16-9	No	--	--	--	--	--
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Impact UTIL-2 pages 3.12-10 to 3.16-12	No	--	--	--	--	--
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Impact UTIL-3 page 3.16-12	No	--	--	--	--	--

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Public Services, Utilities, and Service Systems Impacts: Would the treatment result in other impacts to public services, utilities, and service systems that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT UTIL-1

The proposed project does not include prescribed burning or non-shaded fuel breaks and would not require the use of on-site water supplies. Therefore, this impact does not apply to the proposed project.

IMPACT UTIL-2

The proposed project includes treatment methods that generate solid organic waste during mechanical and manual vegetation removal in the form of organic woody biomass. Biomass generated during treatment activities would be disposed of through chipping and mastication. The proposed project does not include the transport of biomass to off-site waste facilities for processing. Therefore, this impact does not apply to the proposed project as it would not generate solid waste exceeding state or local standards or infrastructure capacity.

IMPACT UTIL-3

As described in Impact UTIL-2, the proposed project does not include the transport of biomass to local waste providers; therefore, this impact does not apply to the proposed project.

NEW PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.16.1, *Regulatory Setting*, and Section 3.16.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to public services, utilities, and service systems present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to public services, utilities, and service systems would occur.

4.16 Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	**Identify Impact Significance in the PEIR**	**Identify Location of Impact Analysis in the PEIR**	**Does the Impact Apply to the Treatment Project?**	**List SPRs Applicable to the Treatment Project[1]**	**List MMs Applicable to the Treatment Project[1]**	**Identify Impact Significance for Treatment Project**	**Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?**	**Is This Impact Within the Scope of the PEIR?**
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Impact WIL-1 pages 3.17-13 to 3.17-14	Yes	HAZ-2 HAZ-3 HAZ-4 AMM-41	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Postfire Flooding or Landslides	LTS	Impact WIL-2 pages 3.17-14 to 3.17-15	Yes	GEO-3 GEO-4/ AMM-37 GEO-5 GEO-8/ AMM-35 AMM-34 AMM-36	NA	LTS	No	Yes

[1] NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?

☐ **Yes** ☒ **No** If yes, complete row(s) below and discussion.

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT WIL-1

The proposed project includes manual, mechanical, and prescribed herbivory treatments within areas identified as high risk for wildfire potential. Consistent with the PEIR, proposed treatment activities have the potential to result in temporary risks associated with uncontrolled fire from the use of vehicles and heavy machinery in the treatable landscape due to the risk of accidental wildfire ignition. AMM-41, included in Section 2, *Project Description* (see Table 2), would reduce the potential for proposed treatment activities to ignite a wildfire. In addition, SPRs HAZ-1 through HAZ-4, included in the PEIR, would be implemented to further reduce the risk of uncontrolled spread of a wildfire from treatment activities. AMM-41 encompasses the following SPRs: HAZ-1, which requires routine maintenance on all equipment; HAZ-2, which requires all mechanized equipment to be equipped with federally and state-approved spark arrestors to prevent the emission of flammable debris; HAZ-3, which requires vegetation

treatment crews to carry one fire extinguisher per chainsaw used, one long-handle shovel, and one axe or Pulaski to quickly respond to an ignition should one occur; and HAZ-4, which prohibits smoking outside of designated smoking areas. In addition, AMM-41 requires crews to monitor weather and fire danger on a daily basis and a designated crew member at each treatment area to monitor for fires during Red Flag Warnings. Implementation of proposed treatment activities would not substantially exacerbate fire risk that could result in the uncontrolled spread of wildfire. The proposed project would ultimately reduce the fuel load and result in a long-term reduction in wildlife risk of uncontrolled spread of wildfire. Therefore, project impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

IMPACT WIL-2

Consistent with the PEIR, the proposed project does not include the construction of new structures that could place people or structures in an area with risks related to post-wildfire flooding or landslides. In addition, the proposed project does not include prescribed burning as a treatment option. However, treatment activities have the potential to result in soil disturbance. AMM-34 through AMM-37, included in Section 2, *Project Description* (see Table 2), and SPRs GEO-3 through GEO-5 and GEO-8 would be implemented to stabilize disturbed soils and reduce the risk of post-fire flooding or landslides. SPR GEO-3 requires highly disturbed treatment areas to be stabilized following mechanical or prescribed herbivory treatments with mulch. AMM-36 limits the use of heavy equipment in areas that could cause compaction of or damage to soils when they are wet or saturated. AMM-34 limits treatment activities during rain, and SPR GEO-4 requires treatment areas to be inspected for erosion prior to and following the first large rainfall event. SPR GEO-5 requires the project proponent to drain compacted and/or bare linear treatment areas capable of generating stormwater runoff through the use of water breaks. AMM-35 and SPR GEO-8 would limit equipment operation on steep or unstable slopes to reduce the potential for erosion. The overall goal of the proposed project is to implement treatments in order to reduce fuel loads and the risk of wildfire and associated flooding or landslides that could impact surrounding communities. Therefore, project impacts would be less than significant, consistent with the PEIR, and would not result in any new or more significant environmental impacts.

NEW WILDFIRE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.17.1, *Regulatory Setting*, and Section 3.17.2, *Environmental Setting*, in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to wildfire would occur.

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APPENDIX A

CalVTP PEIR Addendum
Project-Specific
Mitigation Monitoring and Reporting Program

INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A mitigation monitoring and reporting program (MMRP) is required for approval of the proposed project outlined in the Project-Specific Analysis (PSA). Standard Project Requirements (SPRs) and Mitigation Measures (MMs), which are part of the program description, outlined in the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR), have been adopted. These SPRs and MMs have been designed to avoid or mitigate significant environmental effects that were identified in the PEIR.

PURPOSE OF THE MMRP

This MMRP has been prepared to monitor the implementation of SPRs and MMs. The attached table presents the text of each SPR and mitigation measure, the timing of its planned implementation, the implementing entity, and the entity with monitoring responsibility. The numbering of SPRs and MMs follows the numbering used in the PEIR. SPRs and MMs that are referenced more than once in the PSA are not duplicated in the MMRP.

ROLES AND RESPONSIBILITIES

The project proponent (the Town of Los Gatos [Town]) is responsible for taking all actions necessary to implement the SPRs and MMs described in this document. The project proponent is responsible for administration of the project, including timing of mitigations, monitoring, and all project requirements. The CEQA lead agency (the Town), will be responsible for verification of all mitigations and monitoring efforts.

REPORTING

The project proponent will document the compliance of the proposed project with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report.

STANDARD PROJECT REQUIREMENTS AND MITIGATION MEASURES CHECKLIST

- **Applicable Standard Project Requirements and Mitigation Measures.** The SPR or MMs listed below are applicable to the initial treatment and/or treatment maintenance. A yes/no is placed next to the initial treatment and treatment maintenance to indicate if it is applicable to that stage of treatment. SPRs and MMs not applicable to initial or maintenance treatments were removed from the table.
- **Timing.** This column identifies the time frame in which the SPR or MM will be implemented (e.g., prior to treatment, during treatment, etc.).
- **Implementing Entity.** The implementing entity is the agency or organization responsible for carrying out the requirement.
- **Verifying/Monitoring Entity.** The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Administrative Standard Project Requirements					
SPR AD-2 Delineate Protected Resources. The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
SPR AD-3: Consistency with Local Plans, Policies, and Ordinances. The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
SPR AD-5 Maintain Site Cleanliness. If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR AD-6: Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	1 to 3 days prior to the treatment activities	Town of Los Gatos	Town of Los Gatos	
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and following treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ► GIS data that include project location (as a point); ► project size (typically acres); ► treatment types and activities; and ► contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ► A completed PSA Environmental Checklist; ► A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ► GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ► GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ► A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Aesthetic and Visual Resource Standard Project Requirements					
SPR AES-1 Vegetation Thinning and Edge Feathering. The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical and manual treatment activities	Town of Los Gatos	Town of Los Gatos	
SPR AES-2: Avoid Staging within Viewsheds. The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR AES-3 Provide Vegetation Screening. The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During design of treatment	Town of Los Gatos	Town of Los Gatos	
Air Quality Standard Project Requirements					
SPR AQ-1: Comply with Air Quality Regulations. The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR AQ-4 Minimize Dust. To minimize dust during treatment activities, the project proponent will implement the following measures: ► Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ► If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ► Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ► Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR AQ-5: Avoid Naturally Occurring Asbestos. The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements					
SPR CUL-1: Conduct Record Search. An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
SPR CUL-2: Contact Geographically Affiliated Native American Tribes. The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ► A written description of the treatment location and boundaries. Brief narrative of the treatment objectives. ► A description of the activities used (e.g., mastication) and associated acreages. ► A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ► A request for information regarding potential impacts to cultural resources from the proposed treatment. ► A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
SPR-CUL-3: Pre-field Research. The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
SPR CUL-4: Archaeological Surveys. The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR CUL-5: Treatment of Archaeological Resources. If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	
SPR CUL-6 Treatment of Tribal Cultural Resources. The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	
SPR CUL-7: Avoid Built Historical Resources. If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area,	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR CUL-8: Cultural Resource Training. The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	
Biological Resources Standard Project Requirements					
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with	Initial Treatment: Y Treatment Maintenance: Y	Conduct data review and reconnaissance-level survey prior to treatment projects and no more than 1 year prior to submittal of the PSA for each treatment project	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
a qualified RPF or biologist, will determine which one of the following best characterizes the treatment: 1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.** If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). c. Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.** Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Sensitive Natural Communities and Other Sensitive Habitats					
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ► require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ► map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ► Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian	Initial Treatment: Y Treatment Maintenance: Y	During design of treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry.					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval	Initial Treatment: Y Treatment Maintenance: Y	During design of treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: ► Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. ► The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ► For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ► Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ► A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. ► Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ► If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.					
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (Fusarium), goldspotted oak borer, shot hole borer, bark beetle): ► clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ► include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ► minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment;	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Special-Status Plants					
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special- status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special- status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Environmentally Sensitive Habitat Areas					
Invasive Plants and Wildlife					
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ► clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ► for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ► inspect all heavy equipment, vehicles, tools, or other treatment- related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ► stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ► identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Wildlife					
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	No more than 14 days prior to treatment projects	Town of Los Gatos	Town of Los Gatos, CDFW, and/or USFWS	
SPR BIO-11: Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to ensure that minimize the risk of wildlife entanglement is low. The fencing design will meet the following standards:	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.					
SPR BIO-12: Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area,	Initial Treatment: Y Treatment Maintenance: Y	Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically, up to 3 weeks before treatment); if an active nest is observed, implement avoidance strategies prior to and during treatment projects	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ► **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. ► **Treatment activities will be implemented outside of the buffer.** The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ► **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ► **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions. If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ **Monitor Active Raptor Nest During Treatment.** A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ **Retention of Raptor Nest Trees.** Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Geology, Soils, and Mineral Resource Standard Project Requirements					
SPR GEO-1: Suspend Disturbance during Heavy Precipitation. The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment projects, if there is a "chance" (30% or more) of rain within the next 24 hours	Town of Los Gatos	Town of Los Gatos	
SPR GEO-2: Limit High Ground Pressure Vehicles. The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are	Initial Treatment: Y Treatment Maintenance: Y	During treatment projects, if there is a "chance" (30% or more) of rain within the next 24 hours	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.					
SPR GEO-3: Stabilize Disturbed Soil Areas. The project proponent will stabilize soil disturbed during mechanical and prescribed herbivory treatments that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical or prescribed herbivory treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical and prescribed herbivory that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During manual, mechanical, and prescribed herbivory, activities that result in exposure of bare soil over 50% or more of the treatment area	Town of Los Gatos	Town of Los Gatos	
SPR GEO-4: Erosion Monitoring. The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical and prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Inspect treatment areas for the proper implementation of erosion control SPRs and MMs prior to the rainy season; if erosion control measures are not properly implemented, remediate prior to the first rainfall event; inspect for evidence of erosion after the first large storm or rainfall event (i.e., greater than or equal to 1.5 inches in 24 hours) as soon as is feasible after the event; any area of erosion that will result in substantial sediment discharge	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
		will be remediated within 48 hours			
SPR GEO-5: Drain Stormwater via Water Breaks. The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical, manual, and prescribed herbivory treatment activities	Town of Los Gatos	Town of Los Gatos	
SPR GEO-7: Minimize Erosion. To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR GEO-8: Steep Slopes. The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment projects with slopes greater than 50%	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non- shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.					
Hazardous Material and Public Health and Safety Standard Project Requirements					
SPR HAZ-1: Maintain All Equipment. The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Inspect all equipment for leaks prior to treatment projects; inspect everyday thereafter until equipment is removed from the site; promptly remove any leaking equipment; maintain all diesel- and gasoline-powered equipment per manufacturer's specifications and in compliance with all federal and state emissions requirements during treatment projects	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-2: Require Spark Arrestors. The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-3: Require Fire Extinguishers. The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
SPR HAZ-4: Prohibit Smoking in Vegetated Areas. The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-5: Spill Prevention and Response Plan. The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ► a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ► a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ► procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prepare SPRP prior to beginning any herbicide treatment activities; during herbicide treatment	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-6: Comply with Herbicide Application Regulations. The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ► Be implemented consistent with recommendations prepared annually by a licensed PCA. ► Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. ► Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ► Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-7: Triple Rinse Herbicide Containers. The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.					
SPR HAZ-8: Minimize Herbicide Drift to Public Areas. The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ► application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ► spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ► low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ► spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	Town of Los Gatos	Town of Los Gatos	
SPR HAZ-9: Notification of Herbicide Use in the Vicinity of Public Areas. For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Hydrology and Water Quality Standard Project Requirements					
SPR HYD-1: Comply with Water Quality Regulations. Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR HYD-3: Water Quality Protections for Prescribed Herbivory. The project proponent will include the following water quality protections for all prescribed herbivory treatments: ► Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ► Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ► Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/ Monitoring Entity</th><th>Compliance Reporting</th></tr>
<tr><td>SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones.
The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or
2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or
2) Aquatic habitat for nonfish aquatic species.
3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high- water flow conditions after completion of timber operations.</td></tr>
<tr><td colspan="4">WLPZ Width (ft) – Distance from top of bank to the edge of</td></tr>
<tr><td>< 30% Slope</td><td>100</td><td>50</td><td rowspan="2">Sufficient to prevent the degradation of downstream beneficial uses of water.</td></tr>
<tr><td>30–50% Slope</td><td>100</td><td>75</td></tr>
<tr><td>>50% Slope</td><td>100</td><td>100</td><td>Determined on a site-specific basis.</td></tr>
</table></td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Establish WLPZs during design of treatment projects; implement WLPZ protections during treatment projects</td><td>Town of Los Gatos</td><td>Town of Los Gatos</td><td></td></tr>
</table>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version) The following WLPZ protections will be applied for all treatments: ▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ Burn piles will be located outside of WLPZs. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs. ▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. ▶ Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides. The project proponent will implement the following measures when applying herbicides: ► Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ► Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ► No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ► No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ► For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ► Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ► No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
SPR HYD-6: Protect Existing Drainage Systems. If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Mark existing stormwater drainage infrastructure prior to ground-disturbing activities; if a drainage structure or infiltration system is inadvertently disturbed or modified during treatment, coordinate with owner to repair damage and restore pre-project drainage conditions	Town of Los Gatos	Town of Los Gatos	
Noise Standard Project Requirements					
SPR NOI-1: Limit Heavy Equipment Use to Daytime Hours. The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of- day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR NOI-2: Equipment Maintenance. The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers'	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.					
SPR NOI-3: Engine Shroud Closure. The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR NOI-4: Locate Staging Areas Away from Noise-Sensitive Land Uses. The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise- sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR NOI-5: Restrict Equipment Idle Time. The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors. For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to mechanical treatment activities within 1,500 feet of noise-sensitive receptors	Town of Los Gatos	Town of Los Gatos	
Recreation Standard Project Requirements					
SPR REC-1: Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which	Initial Treatment: Y Treatment Maintenance: Y	Approximately 2 weeks prior to treatment projects requiring temporary closure of public recreation areas or facilities	Town of Los Gatos	Town of Los Gatos and Santa Clara County Administrative Officer (or equivalent official responsible for distribution of public information)	

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
Transportation Standard Project Requirements					
SPR TRAN-1: Implement Traffic Control during Treatments. Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	If needed, prepare TMP prior to treatment projects and implement during project treatments	Town of Los Gatos	Town of Los Gatos and agency(ies) with jurisdiction over affected roadways	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Air Quality					
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques. Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: ▶ Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NOX and PM.					
Archaeological, Historical, and Tribal Cultural Resources					
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources. If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Town of Los Gatos	Town of Los Gatos	
Biological Resources					
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA. If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.					
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA. If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat:	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump- sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special- status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be					

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.					
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants. If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat.					

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result, treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.					
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities). If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. ▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos, CDFW, and/or USFWS/ NOAA Fisheries	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Maintain Habitat Function ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.					
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities). If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos, CDFW, and/or USFWS	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: ▪ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▪ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special- status species.					

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
Maintain Habitat Function ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▪ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special- status					

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non- listed special-status species would benefit from the treatment.					
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands. The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, Fire Characteristics (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural					

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.					
Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands. If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos, CDFW, and/or any other applicable responsible agency	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.					
Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat. If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: ▪ restoring riparian habitat functions and acreage within the treatment area; ▪ restoring degraded riparian habitat outside of the treatment area; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements,	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.					
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands. Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment activities	Town of Los Gatos	Town of Los Gatos	

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/ Monitoring Entity	Compliance Reporting
treatments, prescribed herbivory, equipment and vehicle access or staging.					
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites. The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ **Retain Known Nursery Sites.** A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. ▶ **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment activities	Town of Los Gatos	Town of Los Gatos	

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APPENDIX B

Open Space VMP Treatment Activities Maps

	January	February	March	April	May	June	July	August	September	October	November	December
Habitat Communities												
Grassland/Herbaceous	Grazing											
				Mowing / Cutting								
Chaparral/Scrub				Masticating / Cutting								
Oak Woodland				Cutting / Chipping								
Riparian Woodland				Cutting								
Invasive Species												
French Broom				Pulling		Cutting						
English Ivy				Pulling		Cutting						
	Grazing											
Italian thistle	Pulling		Chemical								Pulling	
			Grazing									
Tree of Heaven	Chemical											
	Pulling		Cutting								Pulling	
Privet									Cutting			
Eucalyptus				Chipping								
				Chemical							Cutting	
Acacia	Pulling		Chemical								Cutting / Pulling	

*Treatment timing should be the same each year.

**Nesting bird season occurs from March through August. AMMs apply.

Worcester Park - Moderate Risk Priority 2				
	Total Acres	**Treatment Standards**	**Treatment Activity**	**AMMs**
Defensible Space	*2.90*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Shaded Fuel Break	*4.82*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Trails (lf)	*2698.35*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fuel Reduction Area	*2.33*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Invasive Species Removal	*3.01*	See Section 10.1.3.4 - 10.1.3.8	Manual, Mechanical,*Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Mowing/Grazing	*0.38*	See Section 10.1.3.1	Mechanical, Prescribed Herbivory/Grazing	Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Woody Slash & Debris Removal	*1.25*	See Section 10.1.2	Mechanical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Invasive Species				
French Broom	*0.09*	See Section 10.1.3.6	Manual (Pulling), Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Acacia	*0.57*	See Section 10.1.3.4	Manual (Pulling), *Chemical, Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
English Ivy	*1.25*	See Section 10.1.3.7	Manual (Pulling), Mechanical (Cutting), Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Tree of Heaven	*1.10*	See Section 10.1.3.5	Manual (Pulling), *Chemical, Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Sensitive Habitat				
Oak Woodland	*8.68*	See Section 10.1.3.3	Mechanical (Cutting)	Delineate work, treatment, and protected resource area boundaries (General Measure 1). Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).

*Restrictions apply in riparian habitat. Seasonal and quantitative restrictions may apply to sensitive habitats. Nesting bird season occurs from March through August. See AMMs.

LOS GATOS VEGETATION MANAGEMENT PLAN

Worcester Park Treatments

Worcester Park (11.33 Acres)

Trail (2,698.35 Feet)

Treatment Type

Fuel Reduction Area (2.33 Acres)

Mow / Graze (0.38 Acre)

Shaded Fuel Break (4.82 Acres)

Defensible Space (2.90 Acres)

Woody Debris & Dense Understory (1.25 Acres)

Invasive Species

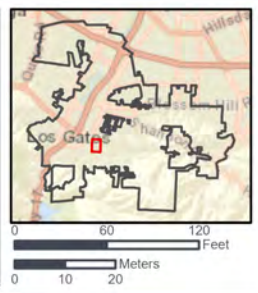
Acacia, Ivy, & Vinca (0.57 Acre)

Broom (0.09 Acre)

Ivy (1.25 Acres)

Tree of Heaven (1.10 Acres)

Santa Clara County, Ca
NAD 1983 UTM Zone 10N



File: Worcester Vegetation

SWCA ENVIRONMENTAL CONSULTANTS

Worcester Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).
10.1.3.4 Acacia, Eucalyptus & Privet	Acacia and eucalyptus are highly invasive and highly flammable species that contains flammable resins and oils. This species occurs throughout the VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for acacia areas follow: · Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees (Figure 10-3). · Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps. · A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest lying branches and any scrub species (Figure 10-2). · Cut and treat larger sapling and mature tree species with herbicides. · Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts. · Acacia and eucalyptus can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.
10.1.3.5 Tree of Heaven	Tree of heaven is a highly invasive and flammable species that is commonly found in disturbed areas and along riparian corridors within the VMP Area. Recommendations for tree of heaven areas follow: · Pull seedlings and small saplings while soils are moist and loose. Remove taproots by digging around the base of the plant to remove all roots and prevent resprouts. · Cut the stems of mature trees at the beginning of spring and once more in June or July to reduce seed production and deplete energy reserves. · Cut and treat trunks or stems of large trees (i.e., greater than 4-inches diameter at breast height [dbh]) with chainsaws and apply herbicides.
10.1.3.6 Broom Species	Broom is common in VMP Area understories and can grow in grasslands, scrub, and woodland habitats. Recommendations for tree of heaven areas follow: · Pull shrubs by hand using a weed wrench. · Cut shrubs to just above ground level using loppers or brush cutters during the dry season in areas sensitive to ground disturbance.
10.1.3.7 English Ivy	English Ivy is a woody vine generally found in moist areas with dense canopies and good shade cover. Recommendations for tree of heaven areas follow: · Pull vines climbing trees and on the ground by hand or using rakes. · Cut stems with pruners or loppers and dig up roots using shovels to prevent resprouts. · Utilize prescribed herbivory, as appropriate, to remove ivy.

LOS GATOS VEGETATION MANAGEMENT PLAN

Worcester Park Sensitive Habitat

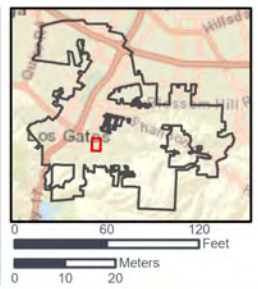
Worcester Park (11.33 Acres)

Trail (2,698.35 Feet)

Sensitive Habitat Type

Oak Woodland (8.68 Acres)

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

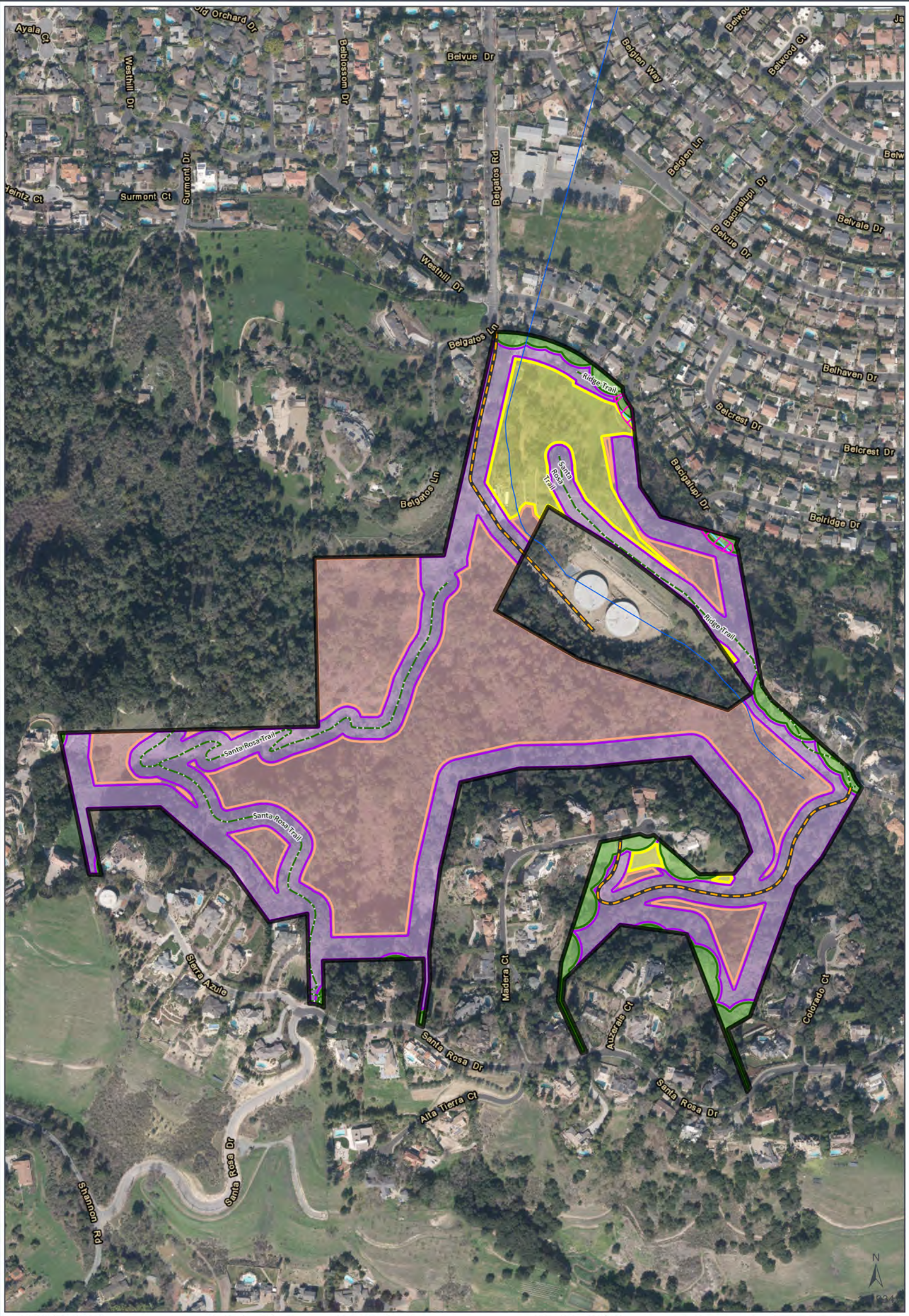


File: Worcester Sensitive Habitat

SWCA ENVIRONMENTAL CONSULTANTS

Santa Rosa Open Space Preserve - High Risk Priority 1				
	Total Acres	**Treatment Standards**	**Treatment Activity**	**AMMs**
Defensible Space	*3.83*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Shaded Fuel Break	*32.40*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Trails (lf)	*6041.67*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fire Road (lf)	*2961.86*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fuel Reduction Area	*33.55*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Invasive Species Removal	*0.25*	See Section 10.1.3.4	Manual, Mechanical,*Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Mowing/Grazing	*6.13*	See Section 10.1.3.1	Mechanical, Prescribed Herbivory/Grazing	Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Invasive Species				
Eucalyptus	*0.25*	See Section 10.1.3.4	*Chemical, Mechanical (Cutting & Chipping)	
Sensitive Habitat				
Riparian	*3.03*	See Section 10.1.3.9	Manual, Mechanical (Cutting)	Delineate work, treatment, and protected resource area boundaries (General Measure 1). Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). All AMMs in the Aquatic Resources Section apply.
Oak Woodland	*46.43*	See Section 10.1.3.3	Mechanical (Cutting)	Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).
Chaparral/Scrub	*16.60*	See Section 10.1.3.2	Mechanical (Cutting), Prescribed Herbivory/Grazing	Activities will avoid areas with special-status species (Biological Resources Measure 13). Treatments in chaparral habitat require consultation with a qualified biologist (Biological Resources Measure 16). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).

*Restrictions apply in riparian habitat. Seasonal and quantitative restrictions may apply to sensitive habitats. Nesting bird season occurs from March through August. See AMMs.



LOS GATOS VEGETATION MANAGEMENT PLAN

Santa Rosa Open Space and Recreation Area Treatments

SWCA ENVIRONMENTAL CONSULTANTS

- Santa Rosa Open Space (75.89 Acres)
- Trail (6,041.67 Feet)
- Fire Road (2,961.86 Feet)

Invasive Species

- Eucalyptus (0.25 Acre)

Treatment Type

- Defensible Space (3.83 Acres)
- Fuel Reduction Area (33.55 Acres)
- Mow / Graze (6.13 Acres)
- Shaded Fuel Break (32.40 Acres)

NHD

- Stream/Creek

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

File: Santa Rosa Vegetation

Santa Rosa Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.2 Chaparral/Scrub	Chaparral, scrub, and brush occur throughout the VMP Area and include species like California sage scrub and coyote brush. This vegetation type generally occurs in dense clusters with some tree species interspersed. Recommendations for chaparral/scrub areas follow: · Dead and dying debris should be cut and trimmed or removed. Roots can be left in place in order to maintain soil stability if necessary. · All vegetative debris should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · If trees are growing among this community, a minimum distance of 3 times the height of the scrub should be cleared between the lowest lying branches and the chaparral/scrub species (Figure 10-2). · Horizontal separation should be 2 to 3 times the height of the chaparral/scrub (Figure 10-3).
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).
10.1.3.4 Acacia, Eucalyptus & Privet	Acacia and eucalyptus are highly invasive and highly flammable species that contains flammable resins and oils. This species occurs throughout the VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for acacia areas follow: · Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees (Figure 10-3). · Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps. · A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest lying branches and any scrub species (Figure 10-2). · Cut and treat larger sapling and mature tree species with herbicides. · Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts. · Acacia and eucalyptus can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.
10.1.3.9 Riparian Woodland	Riparian woodlands generally contain dense canopies with intermittent to continuous understories. Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. Riparian areas are sensitive and vegetation management activities should be minimal to protect and avoid impacts to sensitive resources per the AMMs and BMPs in Section 11, Practices to Avoid or Minimize Impacts. Recommendations for riparian areas follow: · Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. · Target climbing and ladder fuels, such as poison oak and giant reed (Arundo donax). Three feet of separation should be maintained between surface fuels and low-lying canopy branches. · Remove highly flammable species (Section 10.4.2). · Monitor canopy continuation and connectivity. In areas with gaps in the canopy, understory growth, including ladder fuels, is more prevalent. These gaps, if present, should maintain 3 times the vertical distance of the height of surface fuels which should be trimmed or removed to ensure no highly flammable pockets of dense vegetation forms (Figure 10-2).

LOS GATOS VEGETATION MANAGEMENT PLAN

Santa Rosa Open Space and Recreation Area Sensitive Habitat

SWCA ENVIRONMENTAL CONSULTANTS

- Santa Rosa Open Space (75.89 Acres)
- Trail (6,041.67 Feet)
- Fire Road (2,961.86 Feet)
- Grazing Exclusion Area

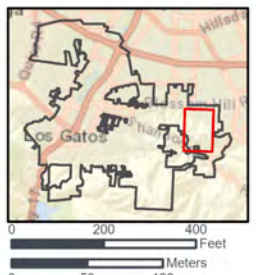
Sensitive Habitat Type

- Oak Woodland (46.43 Acres)
- Chaparral/Scrub (16.60 Acres)
- Riparian (3.03 Acres)

NHD

- Stream/Creek

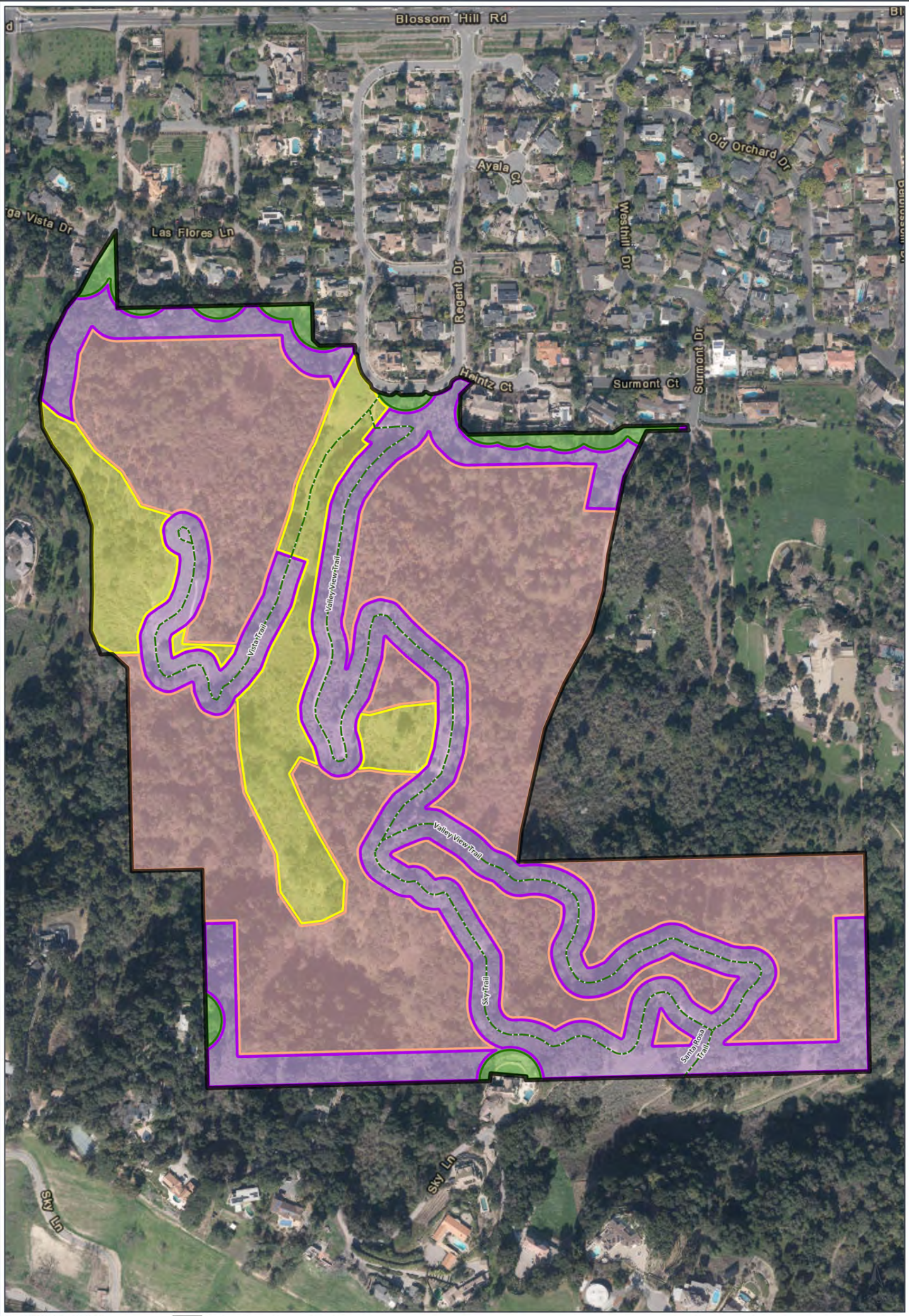
Santa Clara County, Ca
NAD 1983 UTM Zone 10N



File: Santa Rosa Sensitive Habitat

Heintz Open Space Preserve - High Risk Priority 1				
	Total Acres	**Treatment Standards**	**Treatment Activity**	**AMMs**
Defensible Space	*2.04*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Shaded Fuel Break	*26.67*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Trails (lf)	*8428.98*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fuel Reduction Area	*49.10*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Mowing/Grazing	*10.29*	See Section 10.1.3.1	Mechanical, Prescribed Herbivory/Grazing	Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Sensitive Habitat				
Oak Woodland	*64.72*	See Section 10.1.3.3	Mechanical (Cutting)	Delineate work area/treatment area boundary (General Measure 1). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).
Chaparral/Scrub	*20.30*	See Section 10.1.3.2	Mechanical (Cutting), Prescribed Herbivory/Grazing	Activities will avoid areas with special-status species (Biological Resources Measure 13). Treatments in chaparral habitat require consultation with a qualified biologist (Biological Resources Measure 16). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).

*Restrictions apply in riparian habitat. Seasonal and quantitative restrictions may apply to sensitive habitats. Nesting bird season occurs from March through August. See AMMs.



LOS GATOS VEGETATION MANAGEMENT PLAN

Heintz Open Space and Recreation Area Treatments

SWCA ENVIRONMENTAL CONSULTANTS

Heintz Open Space (88.12 Acres)

Trail (8,428.98 Feet)

Treatment Type

- Defensible Space (2.04 Acres)
- Fuel Reduction Area (49.10 Acres)
- Mow / Graze (10.29 Acres)
- Shaded Fuel Break (26.67 Acres)

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

File: Heintz Vegetation

Heintz Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.2 Chaparral/Scrub	Chaparral, scrub, and brush occur throughout the VMP Area and include species like California sage scrub and coyote brush. This vegetation type generally occurs in dense clusters with some tree species interspersed. Recommendations for chaparral/scrub areas follow: · Dead and dying debris should be cut and trimmed or removed. Roots can be left in place in order to maintain soil stability if necessary. · All vegetative debris should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · If trees are growing among this community, a minimum distance of 3 times the height of the scrub should be cleared between the lowest lying branches and the chaparral/scrub species (Figure 10-2). · Horizontal separation should be 2 to 3 times the height of the chaparral/scrub (Figure 10-3).
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).

LOS GATOS VEGETATION MANAGEMENT PLAN

Heintz Open Space and Recreation Area Sensitive Habitat

SWCA ENVIRONMENTAL CONSULTANTS

- Heintz Open Space (88.12 Acres)
- Trail (8,428.98 Feet)

Sensitive Habitat Type

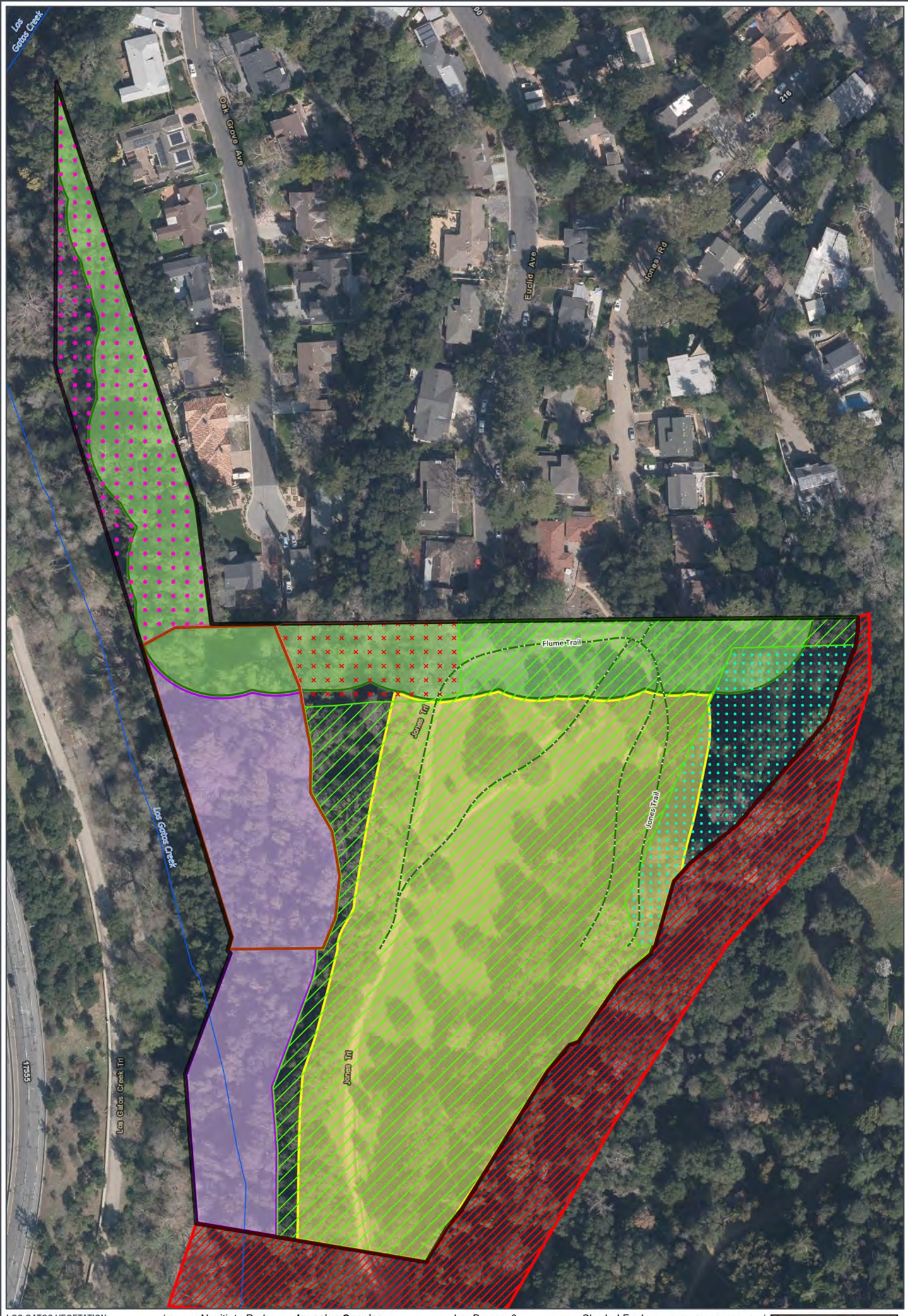
- Oak Woodland (64.72 Acres)
- Chaparral/ Scrub (20.30 Acres)

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

File: Heintz Sensitive Habitat

Novitiate Park - Moderate Risk Priority 2				
	Total Acres	**Treatment Standards**	**Treatment Activity**	**AMMs**
Defensible Space	*2.27*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Shaded Fuel Break	*1.77*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Trails (lf)	*1698.16*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fuel Reduction Area	*0.18*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Invasive Species Removal	*7.90*	See Section 10.1.3.4 - 10.1.3.8	Manual, Mechanical,*Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Mowing/Grazing	*4.58*	See Section 10.1.3.1	Mechanical, Prescribed Herbivory/Grazing	Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Woody Slash & Debris Removal	*1.29*	See Section 10.1.2	Mechanical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Invasive Species				
French Broom	*0.77*	See Section 10.1.3.6	Manual (Pulling), Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
English Ivy	*1.16*	See Section 10.1.3.7	Manual (Pulling), Mechanical (Cutting), Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Privet	*1.16*	See Section 10.1.3.4	Manual (Pulling), *Chemical, Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Italian thistle	*0.41*	See Section 10.1.3.8	Manual (Pulling), *Chemical, Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Tree of Heaven (and non-native grassland)	*5.56*	See Section 10.1.3.5 & See Section 10.1.3.1	Manual (Pulling), *Chemical, Mechanical (Cutting) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Sensitive Habitat				
Riparian	*0.62*	See Section 10.1.3.9	Manual, Mechanical (Cutting)	Delineate work, treatment, and protected resource area boundaries (General Measure 1). Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). All AMMs in the Aquatic Resources Section apply.
Oak Woodland	*6.09*	See Section 10.1.3.3	Mechanical (Cutting)	Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).

*Restrictions apply in riparian habitat. Seasonal and quantitative restrictions may apply to sensitive habitats. Nesting bird season occurs from March through August. See AMMs.



LOS GATOS VEGETATION MANAGEMENT PLAN

Novitiate Park Treatments

SWCA ENVIRONMENTAL CONSULTANTS

- Novitiate Park (9.93 Acres)
- Midpen Wildfire Resiliency Program
- Trail (1,698.16 Feet)

Invasive Species

- Avena, Star thistle, Tree of Heaven, & Non-Native Annual Grassland (5.56 Acres)
- French Broom (0.77 Acre)
- Italian Thistle (0.41 Acre)
- Ivy, Broom, & Privet (1.16 Acres)

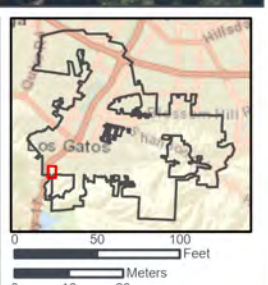
Treatment Type

- Fuel Reduction Area (0.18 Acre)
- Mow / Graze (4.58 Acres)
- Shaded Fuel Break (1.77 Acres)
- Defensible Space (2.27 Acres)
- Woody Slash & Debris Removal (1.29 Acres)

NHD

- Stream/Creek

Santa Clara County, Ca
NAD 1983 UTM Zone 10N



File: Novitiate Vegetation

Novitiate Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.2 Chaparral/Scrub	Chaparral, scrub, and brush occur throughout the VMP Area and include species like California sage scrub and coyote brush. This vegetation type generally occurs in dense clusters with some tree species interspersed. Recommendations for chaparral/scrub areas follow: · Dead and dying debris should be cut and trimmed or removed. Roots can be left in place in order to maintain soil stability if necessary. · All vegetative debris should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · If trees are growing among this community, a minimum distance of 3 times the height of the scrub should be cleared between the lowest lying branches and the chaparral/scrub species (Figure 10-2). · Horizontal separation should be 2 to 3 times the height of the chaparral/scrub (Figure 10-3).
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).
10.1.3.4 Acacia, Eucalyptus & Privet	Acacia and eucalyptus are highly invasive and highly flammable species that contains flammable resins and oils. This species occurs throughout the VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for acacia areas follow: · Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees (Figure 10-3). · Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps. · A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest lying branches and any scrub species (Figure 10-2). · Cut and treat larger sapling and mature tree species with herbicides. · Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts. · Acacia and eucalyptus can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.
10.1.3.6 Broom Species	Broom is common in VMP Area understories and can grow in grasslands, scrub, and woodland habitats. Recommendations for tree of heaven areas follow: · Pull shrubs by hand using a weed wrench. · Cut shrubs to just above ground level using loppers or brush cutters during the dry season in areas sensitive to ground disturbance.
10.1.3.7 English Ivy	English Ivy is a woody vine generally found in moist areas with dense canopies and good shade cover. Recommendations for tree of heaven areas follow: · Pull vines climbing trees and on the ground by hand or using rakes. · Cut stems with pruners or loppers and dig up roots using shovels to prevent resprouts. · Utilize prescribed herbivory, as appropriate, to remove ivy.
10.1.3.8 Italian Thistle	Italian thistle is an invasive species commonly found in disturbed areas, grasslands, and in riparian areas. This species occurs in concentrated patches throughout the VMP Area. Recommendations for Italian thistle areas follow: · Smaller infestations can be removed by hand by pulling, digging, and cutting. Digging may be restricted in areas that contain sensitive habitat including riparian, chaparral, and oak woodland especially in areas upslope of aquatic resources and in areas with steep slopes due to the high level of soil disturbance. · Pull plants by hand once the plant has bolted but prior to flower production. · Cut plants by hand or brush cutters before the thistle flowers and again in early summer to reduce energy reserves. This treatment is best used in the dry season when soils are hard and hand pulling is more difficult. · Graze infestations in the early spring when individual plants are approximately 4 to 6 inches high. Grazing should continue for about 2 to 3 weeks, or in coordination with the contracted grazing manager. · Treat plants with herbicides in mid-spring before they spread seed. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts.
10.1.3.9 Riparian Woodland	Riparian woodlands generally contain dense canopies with intermittent to continuous understories. Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. Riparian areas are sensitive and vegetation management activities should be minimal to protect and avoid impacts to sensitive resources per the AMMs and BMPs in Section 11, Practices to Avoid or Minimize Impacts. Recommendations for riparian areas follow: · Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. · Target climbing and ladder fuels, such as poison oak and giant reed (Arundo donax). Three feet of separation should be maintained between surface fuels and low-lying canopy branches. · Remove highly flammable species (Section 10.4.2). · Monitor canopy continuation and connectivity. In areas with gaps in the canopy, understory growth, including ladder fuels, is more prevalent. These gaps, if present, should maintain 3 times the vertical distance of the height of surface fuels which should be trimmed or removed to ensure no highly flammable pockets of dense vegetation forms (Figure 10-2).

LOS GATOS VEGETATION MANAGEMENT PLAN

Novitiate Park Sensitive Habitat

SWCA ENVIRONMENTAL CONSULTANTS

Novitiate Park (9.93 Acres)

Trail (1,698.16 Feet)

Grazing Exclusion Area

Sensitive Habitat Type

Oak Woodland (6.09 Acres)

Riparian (0.62 Acre)

NHD

Stream/Creek

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

File: Novitiate Sensitive Habitat

La Rinconada Park - Low Risk Priority 3				
	Total Acres	**Treatment Standards**	**Treatment Activity**	**AMMs**
Defensible Space	*0.83*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Shaded Fuel Break	*6.84*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). All Aquatic Resources Measures apply.
Trails (lf)	*1321.83*	See Section 10.1.3.3 & See Section 10.1.3.1	Mechanical (Cutting & Chipping) & Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Fuel Reduction Area	*0.80*	See Section 10.1.3.3	Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). All Aquatic Resources Measures apply.
Invasive Species Removal	*0.48*	See Section 10.1.3.4 - 10.1.3.8	Manual, Mechanical,*Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Mowing/Grazing	*0.29*	See Section 10.1.3.1	Mechanical, Prescribed Herbivory/Grazing	Livestock will be excluded from riparian areas using exclusion fencing (Aquatic Resources Measure 33).
Invasive Species				
English Ivy	*0.33*	See Section 10.1.3.7	Manual (Pulling), Mechanical (Cutting), Prescribed Herbivory/Grazing	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
French Broom	*0.15*	See Section 10.1.3.6	Manual (Pulling), Mechanical (Cutting)	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Acacia	-	See Section 10.1.3.4	Manual (Pulling), Mechanical (Cutting)*Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Privet	-	See Section 10.1.3.4	Manual (Pulling), Mechanical (Cutting), *Chemical	Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19).
Sensitive Habitat				
Riparian	*3.28*	See Section 10.1.3.9	Manual, Mechanical (Cutting)	Delineate work, treatment, and protected resource area boundaries (General Measure 1). Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). All AMMs in the Aquatic Resources Section apply.
Oak Woodland	*3.24*	See Section 10.1.3.3	Mechanical (Cutting)	Activities will avoid areas with special-status species (Biological Resources Measure 13). Limit the risk of pathogens spread through BMPs (Biological Resources Measure 19). Soil and trimmed/chipped vegetation will not be placed where it covers other vegetation or near a waterbody (Aquatic Resources Measure 32).

*Restrictions apply in riparian habitat. Seasonal and quantitative restrictions may apply to sensitive habitats. Nesting bird season occurs from March through August. See AMMs.

LOS GATOS VEGETATION MANAGEMENT PLAN

La Rinconada Park Treatments

SWCA ENVIRONMENTAL CONSULTANTS

La Rinconada Park (8.64 Acres)

Trail (1,321.83 Feet)

Treatment Type

Defensible Space (0.83 Acre)

Fuel Reduction Area (0.80 Acre)

Mow / Graze (0.29 Acre)

Shaded Fuel Break (6.84 Acres)

Invasive Species

Broom, Acacia, and Privet (0.15 Acre)

Ivy (0.33 Acre)

NHD

Stream/Creek

Santa Clara County, Ca
NAD 1983 UTM Zone 10N

File: LaRinconada Vegetation

La Rinconada Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).
10.1.3.4 Acacia, Eucalyptus & Privet	Acacia and eucalyptus are highly invasive and highly flammable species that contains flammable resins and oils. This species occurs throughout the VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for acacia areas follow: · Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees (Figure 10-3). · Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps. · A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest lying branches and any scrub species (Figure 10-2). · Cut and treat larger sapling and mature tree species with herbicides. · Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts. · Acacia and eucalyptus can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.
10.1.3.6 Broom Species	Broom is common in VMP Area understories and can grow in grasslands, scrub, and woodland habitats. Recommendations for tree of heaven areas follow: · Pull shrubs by hand using a weed wrench. · Cut shrubs to just above ground level using loppers or brush cutters during the dry season in areas sensitive to ground disturbance.
10.1.3.7 English Ivy	English Ivy is a woody vine generally found in moist areas with dense canopies and good shade cover. Recommendations for tree of heaven areas follow: · Pull vines climbing trees and on the ground by hand or using rakes. · Cut stems with pruners or loppers and dig up roots using shovels to prevent resprouts. · Utilize prescribed herbivory, as appropriate, to remove ivy.
10.1.3.9 Riparian Woodland	Riparian woodlands generally contain dense canopies with intermittent to continuous understories. Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. Riparian areas are sensitive and vegetation management activities should be minimal to protect and avoid impacts to sensitive resources per the AMMs and BMPs in Section 11, Practices to Avoid or Minimize Impacts. Recommendations for riparian areas follow: · Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. · Target climbing and ladder fuels, such as poison oak and giant reed (Arundo donax). Three feet of separation should be maintained between surface fuels and low-lying canopy branches. · Remove highly flammable species (Section 10.4.2). · Monitor canopy continuation and connectivity. In areas with gaps in the canopy, understory growth, including ladder fuels, is more prevalent. These gaps, if present, should maintain 3 times the vertical distance of the height of surface fuels which should be trimmed or removed to ensure no highly flammable pockets of dense vegetation forms (Figure 10-2).

LOS GATOS VEGETATION MANAGEMENT PLAN

La Rinconada Park Sensitive Habitat

SWCA ENVIRONMENTAL CONSULTANTS

La Rinconada Park (8.64 Acres)

Grazing Exclusion Zone

Sensitive Habitat Type

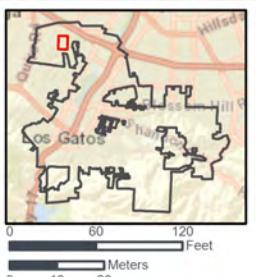
Oak Woodland (3.24 Acres)

Riparian (3.28 Acres)

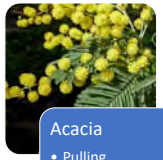
NHD

Stream/Creek

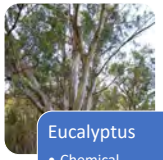
Santa Clara County, Ca
NAD 1983 UTM Zone 10N



File: LaRinconada Vegetation Sensitive Habitat



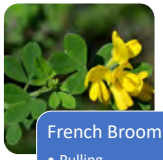
Acacia
- Pulling
- Chemical
- Cutting



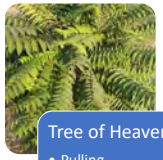
Eucalyptus
- Chemical
- Cutting
- Chipping

Grassland
- Mowing / Cutting
- Grazing

Italian Thistle
- Pulling
- Grazing
- Chemical

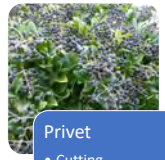


French Broom
- Pulling
- Cutting

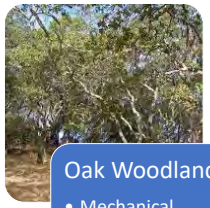


Tree of Heaven
- Pulling
- Chemical
- Cutting

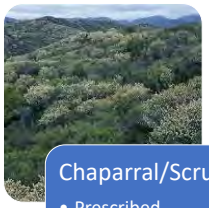
English Ivy
- Cutting
- Pulling
- Grazing



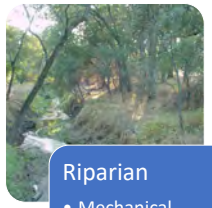
Privet
- Cutting



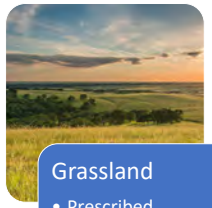
Oak Woodland
- Mechanical (Cutting / Chipping)



Chaparral/Scrub
- Prescribed Herbivory/Grazing
- Mechanical (Masticating / Cutting)



Riparian
- Mechanical (Cutting)



Grassland
- Prescribed Herbivory/Grazing
- Mechanical (Mowing / Cutting)

VMP Treatment Standards	
10.1.3.1 Grassland/Herbaceous	Grassland and certain herbaceous species are flash fuels with quick ignition, burn, and dispersal rates. Non-native annual grassland and herbaceous understories are present throughout the Open Space VMP area. Recommendations for grassland/herbaceous areas follow: · In areas where grassland transitions to woodland habitat, a fuel break should be maintained to prevent ignition of surrounding vegetation. A minimum break of 10 feet of horizontal distance should be maintained between grassland and woodland habitat. · Woody slash and debris created by dead herbaceous vegetation should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · Cut grass must be removed if it exceeds 6 inches of vertical height. If it is below 6 inches in height, grass cuttings can be left in place to protect ground soils from erosion. · Grazing is allowed in this habitat and can occur year-round in certain areas, although it is recommended and most effective in late spring through late summer. Grazing should follow the grazing plan provided by the hired grazing management company.
10.1.3.2 Chaparral/Scrub	Chaparral, scrub, and brush occur throughout the VMP Area and include species like California sage scrub and coyote brush. This vegetation type generally occurs in dense clusters with some tree species interspersed. Recommendations for chaparral/scrub areas follow: · Dead and dying debris should be cut and trimmed or removed. Roots can be left in place in order to maintain soil stability if necessary. · All vegetative debris should be hauled off-site or chipped in place. Vegetative materials chipped in place must not exceed 6 inches in height and should be evenly distributed to prevent a buildup of debris. · If trees are growing among this community, a minimum distance of 3 times the height of the scrub should be cleared between the lowest lying branches and the chaparral/scrub species (Figure 10-2). · Horizontal separation should be 2 to 3 times the height of the chaparral/scrub (Figure 10-3).
10.1.3.3 Oak Woodland	Oak woodland dominates the VMP Area and includes a combination of coast live oak, valley oak, California bay, buckeye, and walnut. As previously mentioned, this is a sensitive vegetation community and work in this habitat type should be minimal and conducted in accordance with AMMs and BMPs outlined in Section 11, Practices to Avoid or Minimize Impacts. Canopies in this community are intermittent to continuous. In areas with breaks in the canopy understories are generally composed of grassland and brush and scrub species. Recommendations for oak woodland areas follow: · In canopy breaks, maintain a vertical distance of 3 feet between surface fuels and low-lying tree branches (Figure 10-2). In areas where shrubs and scrub occupy the understory, a horizontal distance of at least three times the size of the scrub should be maintained, as shown in Figure 10-3. If grassland or herbaceous fuels are present in understories, a minimum distance of three times the vertical height of surface fuels should be maintained. · Duff and leaf litter should not exceed 3 feet above ground level. · If highly flammable species (Section 10.4.2) are present in oak woodland habitat, they should be removed and hauled off-site. · Only shaded fuel breaks or thinning will be used in oak woodland and will not remove more than 20 percent of oak woodland vegetation (i.e., if the oak woodland covers 100 acres, no more than 20 acres will be converted to thin or create the shaded fuel break).
10.1.3.4 Acacia, Eucalyptus & Privet	Acacia and eucalyptus are highly invasive and highly flammable species that contains flammable resins and oils. This species occurs throughout the VMP Area in small, concentrated stands mostly along roadways and adjacent to private properties. Recommendations for acacia areas follow: · Pull seedlings and small saplings by hand or with a weed wrench. Thin dense clusters and maintain 10 to 20 horizontal feet, depending on the slope, between mature trees (Figure 10-3). · Regulate and control stump sprouts, resprouts, and sapling growth using hand pulling for saplings and resprouts and chemical treatments for stumps. · A minimum vertical distance of 3 times the height of resprouts and saplings shall be cleared between the lowest lying branches and any scrub species (Figure 10-2). · Cut and treat larger sapling and mature tree species with herbicides. · Drill and inject with herbicide in applicable areas. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts. · Acacia and eucalyptus can be chipped in place so long as no plant material is left adjacent to sensitive riparian features and does not cover other plants.
10.1.3.5 Tree of Heaven	Tree of heaven is a highly invasive and flammable species that is commonly found in disturbed areas and along riparian corridors within the VMP Area. Recommendations for tree of heaven areas follow: · Pull seedlings and small saplings while soils are moist and loose. Remove taproots by digging around the base of the plant to remove all roots and prevent resprouts. · Cut the stems of mature trees at the beginning of spring and once more in June or July to reduce seed production and deplete energy reserves. · Cut and treat trunks or stems of large trees (i.e., greater than 4-inches diameter at breast height [dbh]) with chainsaws and apply herbicides.
10.1.3.6 Broom Species	Broom is common in VMP Area understories and can grow in grasslands, scrub, and woodland habitats. Recommendations for tree of heaven areas follow: · Pull shrubs by hand using a weed wrench. · Cut shrubs to just above ground level using loppers or brush cutters during the dry season in areas sensitive to ground disturbance.
10.1.3.7 English Ivy	English Ivy is a woody vine generally found in moist areas with dense canopies and good shade cover. Recommendations for tree of heaven areas follow: · Pull vines climbing trees and on the ground by hand or using rakes. · Cut stems with pruners or loppers and dig up roots using shovels to prevent resprouts. · Utilize prescribed herbivory, as appropriate, to remove ivy.
10.1.3.8 Italian Thistle	Italian thistle is an invasive species commonly found in disturbed areas, grasslands, and in riparian areas. This species occurs in concentrated patches throughout the VMP Area. Recommendations for Italian thistle areas follow: · Smaller infestations can be removed by hand by pulling, digging, and cutting. Digging may be restricted in areas that contain sensitive habitat including riparian, chaparral, and oak woodland especially in areas upslope of aquatic resources and in areas with steep slopes due to the high level of soil disturbance. · Pull plants by hand once the plant has bolted but prior to flower production. · Cut plants by hand or brush cutters before the thistle flowers and again in early summer to reduce energy reserves. This treatment is best used in the dry season when soils are hard and hand pulling is more difficult. · Graze infestations in the early spring when individual plants are approximately 4 to 6 inches high. Grazing should continue for about 2 to 3 weeks, or in coordination with the contracted grazing manager. · Treat plants with herbicides in mid-spring before they spread seed. Restrictions apply to sensitive habitat areas, see Section 11, Practices to Avoid or Minimize Impacts.
10.1.3.9 Riparian Woodland	Riparian woodlands generally contain dense canopies with intermittent to continuous understories. Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. Riparian areas are sensitive and vegetation management activities should be minimal to protect and avoid impacts to sensitive resources per the AMMs and BMPs in Section 11, Practices to Avoid or Minimize Impacts. Recommendations for riparian areas follow: · Downed branches, woody slash, and debris should be removed adjacent to stream and creek channels to reduce surface fuel. · Target climbing and ladder fuels, such as poison oak and giant reed (Arundo donax). Three feet of separation should be maintained between surface fuels and low-lying canopy branches. · Remove highly flammable species (Section 10.4.2). · Monitor canopy continuation and connectivity. In areas with gaps in the canopy, understory growth, including ladder fuels, is more prevalent. These gaps, if present, should maintain 3 times the vertical distance of the height of surface fuels which should be trimmed or removed to ensure no highly flammable pockets of dense vegetation forms (Figure 10-2).