



ASCENT
ENVIRONMENTAL



Final Environmental Impact Report for the
Midpeninsula Regional Open Space District
Integrated Pest Management Program

November 2014



PREPARED FOR:
Midpeninsula Regional
Open Space District
330 Distel Circle
Los Altos, CA 94022

Midpeninsula Regional Open Space District Integrated Pest Management Program

Final Environmental Impact Report

PREPARED FOR:



Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022
650/691-1200

Contact:
Cindy Roessler
Senior Resource Management Specialist

PREPARED BY:

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Principal

November 25, 2014

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ACRONYMS AND ABBREVIATIONS

BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
DEIR	Draft Environmental Impact Report
District	Midpeninsula Regional Open Space District
EPA	Environmental Protection Agency
FEIR	Final Environmental Impact Report
IPM	Integrated Pest Management
IPMP	Integrated Pest Management Program
MROSD	Midpeninsula Regional Open Space District
OSPs	open space preserves
SFPUC	San Francisco Public Utilities Commission
SOD	Sudden Oak Death

1 INTRODUCTION

On September 26, 2014, the Midpeninsula Regional Open Space District (MROSD or District) released for public review the Draft Environmental Impact Report (DEIR) for the Integrated Pest Management Program (IPMP or project) which would comprehensively direct management of all pests on District properties. The project is intended to formalize and streamline guidelines and procedures for careful management of pests throughout the District's open space preserves (OSPs) while protecting natural resources and public health. The IPMP would be primarily a vegetation management program in wildlands; however, it would also include some rodent and insect pest management strategies at District-owned structures. MROSD is the lead agency for the project. As lead agency, the District has principal responsibility for approving and carrying out the proposed project.

The DEIR public review period ended on November 10, 2014. In accordance with Section 15088 of the California Environmental Quality Act (CEQA) Guidelines, MROSD, as the lead agency, has reviewed the comments received on the DEIR for the IPMP Project and has prepared this Final EIR (FEIR), which includes written responses to the comments received.

As required by CEQA Guidelines Section 15088(b), the District provided each public agency that submitted written comments on the DEIR with proposed written responses to that public agency's comments at least 10 days prior to certifying the FEIR.

Chapter 2 of the FEIR consists of the written comments received on the DEIR, and presents responses to environmental issues raised in the comments (as required by the State CEQA Guidelines Section 15132). The focus of the responses to comments is on the disposition of significant environmental issues that are raised in the comments, as specified by Section 15088(c) of the State CEQA Guidelines.

Each comment letter has been reproduced and is followed by the responses to the comments. For example, the response to the second comment of the first letter would be indicated as Response to Comment 1-2. In some instances, clarifications of the text of the DEIR may be required. In those cases, the text of the DEIR is revised and the changes compiled in Chapter 3, "Clarifications and Revisions," to the DEIR. The text deletions are shown in ~~strikeout~~ and additions are shown in double underline.

This document and the DEIR together constitute the FEIR, which will be considered by the District prior to a decision on whether to approve the proposed project. Before deciding whether to approve the proposed project, the District, as required by CEQA Guidelines Section 15090, must first certify that the FEIR was completed in compliance with CEQA's requirements, was reviewed and considered by the MROSD Board of Directors, and reflects the Board's independent judgment and analysis. The District will also adopt findings of fact on the disposition of each significant environmental impact, as required by CEQA Guidelines Section 15091(a) and a Mitigation Monitoring and Reporting Program, as required by CEQA Guidelines Section 15091(d).

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2 COMMENTS AND RESPONSES

This chapter of the Final Environmental Impact Report (FEIR) contains the comment letters received during the public review period for the Draft Environmental Impact Report (DEIR), which concluded on November 10, 2014. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on environmental issues received from reviewers of the DEIR.

2.1 COMMENTERS ON THE DEIR

Table 2-1 below indicates the numerical designation for the comment letters received, the author of the comment letter, and the date of the comment letter.

Table 2-1 List of Commenters			
Letter Number	Commenter	Date	Agency/Organization
1	Scott Morgan	November 12, 2014	California State Clearinghouse
2	Rich Sampson	November 10, 2014	Department of Forestry and Fire Protection (CAL FIRE)
3	Joanne C. Wilson, AICP	November 6, 2014	San Francisco Public Utilities Commission, Hetch Hetchy Regional Water System

2.2 COMMENTS AND RESPONSES ON THE DEIR

The written comments received on the DEIR and the responses to those comments are provided in this section of the FEIR. The comment letters received are reproduced in their entirety and followed by the response(s) to the letter. Each comment within the letters are indicated by a line bracket and an identifying number in the margin of the comment letter. The responses that follow the letter are numbered, corresponding to the comment number in the bracketed letter.

Letter
1



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

November 12, 2014

Cindy Roessler
Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

Subject: MROSD Integrated Pest Management Project
SCH#: 2013092033

Dear Cindy Roessler:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 10, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

2014 NOV 14 PM 1:59
MIDPENINSULA REGIONAL OPEN SPACE DISTRICT
330 DISTEL CIRCLE
LOS ALTOS, CA 94022

1-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013092033
Project Title MROSD Integrated Pest Management Project
Lead Agency Midpeninsula Regional Open Space District

Type EIR Draft EIR
Description The Midpeninsula Regional Open Space District proposes to implement a formal Integrated Pest Management (IPM) Program to comprehensively direct management of all pests on District properties. IPM is a long-term, science-based, decision-making system that uses a specific methodology to manage damage from pests. The proposed IPM Program would provide guidance for careful management of pests while protecting natural resources and public health. IPM requires that non-chemical methods be considered in addition to chemical methods. If chemical methods are necessary to meet a pest control objective, the potential for harm to the public and workers is carefully considered, as are effects on the environment, and then the least toxic and most effective, efficient, and target-specific method is chosen.

Lead Agency Contact
Name Cindy Roessler
Agency Midpeninsula Regional Open Space District
Phone (650) 691-1200 **Fax**
email
Address 330 Distel Circle
City Los Altos **State** CA **Zip** 94022

Project Location
County Santa Clara, San Mateo, Santa Cruz
City
Region
Lat / Long
Cross Streets Various
Parcel No. Various
Township

	Range	Section	Base

Proximity to:
Highways US 101, Hwy 85, 17, 280, & 9
Airports Moffett Fed. Airfield, Palo Alto
Railways UPRR
Waterways Various
Schools Various
Land Use Open Space

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 3; Cal Fire; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Caltrans, District 5; Air Resources Board; State Water Resources Control Board, Division of Drinking Water; Department of Toxic Substances Control; Native American Heritage Commission; Department of Pesticide Regulation

Date Received 09/26/2014 **Start of Review** 09/26/2014 **End of Review** 11/10/2014

Letter 1 Response	California State Clearinghouse Scott Morgan November 12, 2014
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- 1-1 The commenter states that no state agencies have commented on the DEIR for the project. This comment is acknowledged. No further response is necessary as no comments on the environmental analysis were raised.

Letter
2

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

Edmund G. Brown Jr., Governor



DEPARTMENT OF FORESTRY AND FIRE PROTECTION

6059 Highway 9
Felton, CA 95018
(831) 335-6794
Website: www.fire.ca.gov

RECEIVED

2014 NOV 17 AM 8:47



MIDPENINSULA REGIONAL
OPEN SPACE DISTRICT

Midpeninsula Regional Open Space District
Attention: Cindy Roessler, Senior Resource Management Specialist
330 Distel Circle
Los Altos, CA 94022

November 10, 2014

RE: Agency Comment for MROSD Integrated Pest Management Program, SCH# 2013092033,
Draft Environmental Impact Report (DEIR)

Dear Ms. Roessler:

Thank you for the opportunity to comment on the District's above referenced Draft EIR. Upon review of the document, the Department of Forestry and Fire Protection (CAL FIRE) wishes to make the following comments:

1. Pages 3-25 & 26 of the document indicate the project will provide guidance in selecting treatment options for the maintenance of fuel management activities. Shaded fuel breaks are a common and often effective fuel management activity, yet the document appears to reference only one along Monte Bello Road in Monte Bello OSP. Consistent with the District's Wildfire Management Policy, CAL FIRE expects additional shaded fuel breaks will be implemented in the near future. Realizing the IPMP is not proposing the implementation of any new fuel management projects on District lands, CAL FIRE is hopeful that as additional shaded fuel breaks are developed through other projects, maintenance of these future projects are included in the scope of this document and not limited to the one existing fuel break.
2. Page 8-2, Appendix B, Integrated Pest Management Guidance Manual, states, "It is unrealistic to think that natural vegetation communities can be managed to create fire-safe, wildfire resilient vegetation that also supports high biodiversity (Zedler 1995)." The reference cited is for a paper that discusses the effects of the fire regime in southern California shrublands. The paper does not make any reference to biodiversity, but rather discusses the effects of both fire exclusion and frequent fire return intervals on shrub communities. Shrublands usually burn in stand-replacing fires and though such fires may be considered natural over some of the District's ownership, historically, low to moderate understory fires likely were common in most of the woodland and mixed evergreen communities of the Bay Area – these areas were very likely resilient to fire and biologically diverse. CAL FIRE is supportive of management that creates conditions in forested areas to promote low to moderate wildfire intensity, thereby improving forest resiliency. The above referenced statement also seems to contradict the District's

2-1

2-2

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Wildfire Management Policy, WF-4: "Manage District vegetation communities to reduce the risk of catastrophic fire and to maintain biological diversity."

- 3. Also stated in Appendix B on Page 8-2 is, "Given the District's lands are all fire prone, the best option for managing fire risk is to focus active management in the wildland-urban interface where fire safety is needed most-adjacent to human communities." While CAL FIRE agrees fuel management in the WUI is a high priority, other fuel management activities should not be overlooked, including those consistent with the District's Wildfire Management Policy (WF-3 subset): "Focus fuel management activities in areas adjacent to development, **essential facilities and improvements, major egress and emergency routes, essential fuel breaks, and sensitive natural and cultural areas.**"

2-2
cont'd

2-3

Sincerely,

Rich Sampson, Division Chief
San Mateo – Santa Cruz Unit Environmental Coordinator

By,



Andrew Hubbs, Forester I

Cc:
State Clearinghouse
CAL FIRE Sacramento HQ

Letter 2 Response	California Department of Forestry and Fire Protection (CAL FIRE) Rich Sampson, Division Chief November 10, 2014
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- 2-1 The commenter states that it is hopeful that the District will develop additional shaded fuel breaks through other fuel management projects in the future and that maintenance of these fuel breaks are included within the scope of the IPMP. The District acknowledges the commenter's request for additional shaded fuel breaks and will consider this request in future fuel management activities. The scope of the IPMP includes the maintenance of existing fuel breaks within District lands. If new fuel breaks are developed on District lands as part of separate fuel management projects, the maintenance activities associated with these new fuel breaks will be reviewed to determine if they are included within the scope of the IPMP and EIR. If the proposed activities are determined by the District's IPM Coordinator to be within the scope of the IPMP and EIR, no further environmental review would be required. If they are determined to be outside the scope of the IPMP and EIR, then supplemental environmental review and amendment of the IPMP may be required. Please refer to Section 1.2, Scope of the Draft Environmental Impact Report, for additional information.
- 2-2 The commenter states that CAL FIRE is supportive of management that creates conditions in forested areas to promote low to moderate wildfire intensity, thereby improving forest resiliency. The District agrees with this statement and the District strives to manage its resources with biological diversity in mind. No further response is necessary as no comments on the environmental analysis were raised.
- 2-3 The commenter states that it agrees that the District should focus active fire management activities in the wildland-urban interface, but that it should also not overlook focusing activities in areas adjacent to development, essential facilities and improvements, major egress and emergency routes, essential fuel breaks, and sensitive natural and cultural areas. The District agrees with this comment. No further response is necessary as no comments on the environmental analysis were raised.

Letter
3

From: Wilson, Joanne [jwilson@sflower.org]
Sent: Thursday, November 06, 2014 10:18 AM
To: Cindy Roessler
Cc: Natesan, Ellen; Thomas, Donald E; Ciardi, Guido; Naras, Joe; Fournet, John
Subject: Draft EIR for Integrated Pest Management Program Proposed by MidPeninsula Open Space District

Hi Cindy: Thank you for this opportunity to comment on the Draft EIR for the Districts proposed IPM Program. I would like to offer the following comments on behalf of the SFPUC.

- 1. Because MROSD currently operates a trail on SFPUC property, our agency should be named as a responsible agency in the final EIR. | 3-1
- 2. I appreciate that section 3.3 of the Draft EIR states that where the District has agreements with other agencies to use their land for open space purposes and those agencies have more restrictive pesticide requirements, the District will comply with those standards. Pesticide use on lands owned by the City and County of San Francisco (and in this case, managed by the SFPUC) must comply with the San Francisco Pesticide Ordinance. Because the SFPUC's Alameda and Peninsula Watershed lands have extensive areas designated as critical habitat for the California Red-legged Frog (CRLF), the EPA Stipulated Injunction regarding pesticide use would apply. For more information about the San Francisco Pesticide Ordinance and the Stipulated Injunction, please view the following website for the San Francisco Department of the Environment (the agency responsible for administering the pesticide ordinance): http://www.sfenvironment.org/sites/default/files/editor-uploads/toxics/pdf/sfe_th_reducedriskpesticide_compliance2013.pdf | 3-2
- 3. Projects and activities on the SFPUC's Alameda and Peninsula Watersheds, as well as on SFPUC Rights-of-Way (ROW) lands in Alameda, Santa Clara, and San Mateo Counties that involve construction; digging or earth moving; clearing; installation; the use of hazardous materials; other disturbance to watershed and ROW resources; or the issuance of new or revised leases and permits; must be reviewed by our Project Review Committee. This Committee reviews proposed projects for consistency with SFPUC plans and policies (including the Alameda and Peninsula Watershed Management Plans), as well as other San Francisco ordinances (including the San Francisco Pesticide Ordinance). | 3-3

Congratulations on achieving this milestone with the publication of the draft EIR for your proposed IPM Program. If you have any questions about my comments or need further information, please contact me.

Sincerely,

Joanne

Joanne C. Wilson, AICP
Senior Land and Resources Planner
Natural Resources and Lands Management Division / Water Enterprise
San Francisco Public Utilities Commission
Hetch Hetchy Regional Water System
1657 Rollins Road
Burlingame, CA 94010-2310
Tel: (650) 652-3205
Fax: (650) 652-3219
Email: jwilson@sflower.org

For more information on the Natural Resources and Lands Management Division, go to: <http://sflower.org/>

Hetch Hetchy Regional Water System

Operated by San Francisco Water, Power and Sewer | Services of the San Francisco Public Utilities Commission

Letter
3
Response

San Francisco Public Utilities Commission, Hetch Hetchy Regional Water System
Joanne C. Wilson, AICP
November 6, 2014

- 3-1 The commenter states that San Francisco Public Utilities Commission (SFPUC) should be named a responsible agency because the District operates a trail on their property.

The District acknowledges that one existing MROSD trail and other future trails may require easements across SFPUC property. Further, the District acknowledges that the SFPUC may serve as a responsible agency to the degree that the District would require any permits or access agreements for implementation of IPM activities on SFPUC lands. SFPUC is responsible for the management of its lands and MROSD will comply with SFPUC's management guidelines for those lands.

- 3-2 The commenter acknowledges a statement in the DEIR that the District will comply with more stringent pesticide regulations on non-District lands in which they have agreements with other agencies to utilize their land. The commenter also points out that activities on lands under the control of the City and County of San Francisco and SFPUC must comply with the San Francisco Pesticide Ordinance and the Environmental Protection Agency's (EPA) Stipulated Injunction regarding pesticide use as it pertains to California Red-Legged Frog habitat.

Consistent with the statement made in Section 3.3 of the DEIR and with Best Management Practice (BMP) #20 identified in Table 3-4, page 3-38 of the DEIR, the District will comply with San Francisco Pesticide Ordinance and the EPA Stipulated Injunction where appropriate and relevant.

- 3-3 The commenter states that activities that involve construction, digging or earth moving, clearing, installation, the use of hazardous materials, disturbance to watershed and ROW resources, or the issuance of new or revised leases and permits on SFPUC's Alameda and Peninsula Watersheds and SFPUC Rights-of-Way in Alameda, Santa Clara, and San Mateo Counties must be reviewed by the SFPUC Project Review Committee.

If projects proposed under the IPMP would result in alteration to SFPUC lands or rights-of-way, the District will initiate the project review process with SFPUC's Project Review Committee.

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3 CORRECTIONS AND REVISIONS TO THE DEIR

This section contains changes to the text of the Draft Environmental Impact Report (DEIR) that are being made to correct minor text errors. The changes are presented in the order in which they appear in the DEIR and are identified by DEIR page number. Text deletions are shown in strikethrough (~~strikethrough~~) and additions are shown in double underline (double underline).

Page 2-13, Impact 4.4-1 is revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

4.4	Hydrology and Water Quality			
4.4-1	<p>Violate water quality standards or waste discharge requirements. Manual control methods used for pests in buildings, recreational facilities, fuel management areas, rangeland and agricultural fields, and natural areas would not result in discharge of sediments into aquatic areas. Erosion control measures required by BMP 28 would be implemented on sites with loose or unstable soils, steep slopes (greater than 30 percent), where a large percentage of the groundcover would be removed, or near aquatic features that could be adversely affected by an influx of sediment.</p> <p>Chemical control options, when used, would be implemented consistent with Pest Control Recommendations prepared annually by a licensed Pest Control Advisor, would be conducted in accordance with proposed BMPs. BMPs would require that chemical control operations be conducted under the supervision of a person holding a Qualified Applicator License or Qualified Applicator Certificate for pesticides; require all storage, loading and mixing of herbicides be set back at least 300 feet from any aquatic feature and all mixing and transferring occur within a contained area; require that application cease when weather parameters exceed label specifications, when wind at site of application exceeds seven miles per hour (MPH), or when precipitation (rain) occurs or is forecasted with greater than a 40 percent probability in the next 24-hour period; and Therefore, implementation of the IPM program would not result in violation of water quality standards or waste discharge requirements.</p>	<p>Less than-significant <u>Potentially Significant</u></p>	<p>No mitigation measures are required <u>Implement Mitigation Measure 4.2-3.</u></p>	<p>Less-than-significant</p>

Pages 4.2-13 and 4.2-14 of the DEIR are revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Impact 4.2-1: Impacts to Special-Status Wildlife Species.

Manual, mechanical, or chemical treatments could result in direct mortality of special-status amphibian, reptile or fish species, or impacts to their federally designated critical habitat. Manual or mechanical treatment of host plants or chemical application of pyrethrin could result in direct mortality of special-status invertebrates. Manual treatments could result in direct mortality of special-status mammal species through trapping within structures and loss of occupied roosting habitat for special-status bats. As a result the project would result in **potentially significant** impacts to special-status amphibian and reptile species (California red-legged frog, foothill yellow-legged frog, northern western pond turtle, San Francisco garter snake, California tiger salamander), special-status fish (tidewater goby, central California coast steelhead, central California coast coho salmon), special-status invertebrate species (bay checkerspot butterfly, Callippe silverspot butterfly, Smith's blue butterfly, and Zayante band-winged grasshopper), and special-status bat mammal species (Townsend's big-eared bat, western red bat, fringed myotis, hoary bat, long-eared myotis, long-legged myotis, and pallid bat, San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat).

Manual and Mechanical Treatment

Buildings

There would be no adverse effects to amphibian and reptile species, birds, fish or invertebrate species through the implementation of manual or mechanical treatments within the District's 103 buildings, as these structures do not provide suitable habitat. Species that may occur within or directly adjacent to structures or buildings include special-status bats (Townsend's big-eared bat, western red bat, fringed myotis, hoary bat, long-eared myotis, long-legged myotis, and pallid bat), San Francisco dusky-footed woodrat, and Santa Cruz kangaroo rat.

Manual and mechanical treatments that seal potential entry points to maintain existing structures as bat-free may result in the loss of roosting or nesting habitat within a building, as well as the mortality of individuals should the sealing points of egress result in the inadvertent entrapment of individuals. Exclusion of bats during the nesting season may result in the death of young. Additionally, when vacant structures are deemed too expensive or time consuming to maintain, or otherwise damaging to the surrounding natural environment, and the buildings would be demolished by the District, permanent removal of roosting or nesting habitat if bats are occupying the structure could occur. This would be considered a potentially significant impact.

While Santa Cruz kangaroo rat has not been found in existing District buildings, the acquisition of additional buildings within the District throughout the timeframe of the IPMP may result in management of buildings adjacent to Santa Cruz kangaroo rat. San Francisco dusky-footed woodrat has been known to occur within District buildings. Snap traps and glue boards used to control Norway and roof rats within buildings may incidentally injure or kill San Francisco dusky-footed woodrats or Santa Cruz kangaroo rat, and as such would not be utilized within 100-feet of woodrat or kangaroo rat nests. As a component of the project, buildings are maintained using mechanical exclusions to prevent colonization by San Francisco dusky-footed woodrat, and management actions throughout natural lands are designed to enhance habitat for San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat. BMP 23 would ensure that District staff and contractors implementing treatment actions are trained in the identification of woodrat and kangaroo rat nests, and that lethal manual and mechanical treatments are not utilized within 100-feet of known nest sites.

As part of management activities San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat nests located in buildings, or within 100-feet ~~for~~ of buildings may be removed to prevent reinfestation from woodrats and kangaroo rats. The removal of nests could result in direct mortality to adults and young during removal or through increased depredation resulting in a significant impact to San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat.

Page 4.2-15, second full paragraph of the DEIR is revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Manual and mechanical vegetation removal within aquatic habitat occupied by California red-legged frog, central California coast steelhead trout, northern western pond turtle, central California coast coho salmon, tidewater goby, foothill yellow-legged frog, or California tiger salamander could result in damage to habitat and the direct mortality eggs and young that cannot actively move out of the treatment area. Additionally the removal of vegetation in occupied upland habitat for California red-legged frog, foothill yellow-legged frog, and San Francisco garter snake could leave these species exposed to predators resulting in mortality, and could disrupt breeding behavior when adjacent to o aquatic breeding habitat. This would be considered a significant impact.

Page 4.2-15, sixth full paragraph of the DEIR is revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Chemical Treatment

Buildings

Chemical treatments include the application of herbicides, fungicide, rodenticide, and insecticide that have been screened for minimal ecological toxicity and environmental fate, and minimal transport, and proven efficacy against target pests (see Appendix A of IPM Guidance Manual). As a standard practice and goal of the IPMP, before the use of chemicals, District staff would first determine if there are other viable non-chemical treatment options to address the pest removal. Only if it is determined that other treatment options are unavailable or would not be effective in pest removal, would the District select chemical treatment options of a selected IPM project. Chemical treatments include the use of insecticides and diatomaceous earth for the control of ant and cockroaches, and the use of rodenticides for control of rats. Rodenticides are only used indoors to control infestations in structures and on a limited basis. Prior to the use of rodenticides, the District must determine that an infestation is severe, and is a risk to human health and safety. As required by BMP 23 rodenticides would not be used in buildings located within 100 feet of San Francisco dusky-footed woodrat nests or Santa Cruz kangaroo rat nests, and would not be permitted for use by lease holders and are not anticipated to impact these species.

Page 4.2-15, first and second full paragraphs of the DEIR are revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Use of rodenticides and other chemicals in the District's 103 buildings would have no impacts to amphibian and reptile species, birds, fish, or invertebrate species because these structures do not provide suitable habitat for these species. Additionally, BMPs 1 through 4, and 8 through 10 require that pesticides be applied by a trained and/or licensed staff, consistent with label guidelines, and that waste products be properly disposed of to reduce potential impacts to non-treatment areas.

Under existing conditions, the District does not always know about the use of pesticides in buildings by tenants lease holders. The proposed IPMP would require lease holders to comply with the IPMP BMPs, and implementation of BMPs 1 through 10 would ensure that lease holders are using ant and roach control in approved bait formulations only and restricted to indoor locations in tamper-proof containers. Tenants Lease holders would not be allowed to use rodenticides. Only trained District staff or contractors could use rodenticides (including on leased properties) and only indoors in tamper-proof and anchored bait stations when an urgent human health issue is determined. This would be an improvement over existing conditions. Indirect effects to wildlife occurring adjacent to building facilities would be minimized through the implementation of the BMPs 1 through 4, and 8 through 10, that regulate the application of pesticides, and ensuring that only approved rodenticides are used as outlined in the IPMP, reducing the risk of secondary poisoning to wildlife that may occur if the project is not implemented. Overall, less-than-significant impacts would occur.

Page 4.2-20, the Mitigation Measure title and the third full paragraph of the DEIR is revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Mitigation Measure 4.2-31e: Mitigation for Impacts to San Francisco dusky-footed woodrat and Santa Cruz kangaroo rat.

Level of Significance after Implementation of Mitigation Measure

With the implementation of Mitigation Measure 4.2-1a through 4.2-1e, the project would not have substantial adverse effect on any special-status wildlife species. The recommended mitigation measures would minimize the risk of take of individual special-status species by avoiding sensitive breeding periods, and limiting activities that may result in direct impacts. Therefore, implementation of the IPMP with mitigation would result in **less-than-significant** impacts to special-status wildlife species.

Starting at page 4.2-20, Impact 4.2-2 of the DEIR is revised as shown below. This change does not alter the conclusions of the DEIR. No new significant impacts would occur.

Impact 4.2-2: Impacts to riparian habitat or other sensitive natural communities.

Manual and mechanical treatment methods used for pest control and fire prevention would affect limited areas of sensitive habitats where they occur adjacent to structures, along trails, and at recreation facilities. Manual and mechanical methods used for invasive plants and other pests on rangelands, agricultural lands, and natural lands would improve habitat function and ensure continued success of sensitive natural communities. Because the District restores natural conditions of riparian habitat and other sensitive natural communities to ensure no loss of habitat function, no net loss of sensitive habitat function would occur. Manual, mechanical, and chemical treatments would have a **less-than-significant** impact on riparian habitat or other sensitive natural communities.

Manual and Mechanical Treatment

Buildings

No riparian habitat or other sensitive natural communities are located within the building treatment areas. Therefore, no impact would occur.

Recreational Facilities, Fuel Management, Rangelands and Agricultural Properties, and Natural Lands

Manual and mechanical activities used for pest control and fire prevention over approximately 2,000 acres would affect limited areas of riparian woodland and oak woodland adjacent to structures, along trails, and at recreation facilities. Manual and mechanical activities for invasive plants and weeds on approximately 950 acres of rangelands, agricultural lands and natural lands may result in the cutting or trampling of broader areas of serpentine bunchgrass, northern maritime chaparral, northern interior cypress forest, valley oak woodland, and valley needlegrass grassland, however, the goal of these activities is specifically to enhance the function of these habitats and these activities would not result in significant impacts to these habitats.

Manual and mechanical removal and chemical cut-stump treatment of a small number of California bay trees may be conducted to protect adjacent oak trees from sudden oak death (SOD), however, this action is not appropriate for managing oak stands or areas forested with oaks and would only be used on a limited basis near high value oaks. Therefore, cut-stump application of fungicides would not result in significant impacts to oak habitats.

Manual and mechanical activities would only occur within riparian habitats under the term of the existing CDFW Streambed Alteration Agreement which limits treatment areas and activities, and requires habitat replacement, restoration, and monitoring to ensure no net-loss of special habitats, these requirements would continue to be implemented under the IPMP and would minimize impacts

to specific riparian habitats and ensure there is no net loss of functioning riparian habitat in the project area. Chemical treatments in riparian habitats would only be selected after careful consideration of alternatives, and would be in lieu of more disruptive manual and mechanical treatments that could lead to soil loss or root damage to riparian species. Chemical treatment options around buildings and recreational facilities would be limited in locations ~~and would not be used in riparian habitat or other sensitive communities~~; treatments on rangelands, agricultural areas, and natural lands would be selectively applied to target invasive species and would have a positive effect on sensitive communities.

As mandated by the CDFW the Streambed Alteration Agreement, the District replaces riparian habitat and other sensitive natural communities affected by pest management activities in CDFW jurisdiction. Per the District's existing CDFW Streambed Alteration Agreement, all riparian trees that are removed are to be replaced and monitored to ensure that restoration areas meet pre-treatment conditions. Non-native trees that provide creek canopy cover are replaced at a 1:1 ratio, native trees that provide creek canopy cover are replaced at a 2:1 ratio. All vegetation is replaced at a minimum 1:1 ratio, and sycamore alluvial woodland and other rare habitats are replaced at a 5:1 ratio. Where restoration is conducted for impacts to riparian habitat, a revegetation plan is prepared and implemented, including monitoring and remediation to ensure that habitat restoration goals are met.

Because the District ensures that no net loss of riparian or other sensitive communities occurs in CDFW jurisdiction, the IPMP does not include changes in land use or habitat, and in many cases has a goal of habitat enhancement, the modification resulting from chemical and manual/mechanical treatments considered a less-than-significant impact.

Chemical Treatment

Buildings, Recreational Facilities, Fuel Management, Rangelands and Agricultural Properties, and Natural Lands
No riparian habitat is located within the District's buildings, therefore, no impact to riparian habitat would occur. ~~Further, no chemical treatments would occur in riparian habitat and no impacts would occur.~~ Implementation of BMPs 1 through 10, require that chemicals be applied by a trained and/or licensed staff, consistent with label guidelines, and that waste products be properly disposed of to reduce potential impacts to non-treatment areas and these actions would limit discharge of chemicals to riparian areas. Further, treatment sites would be surveyed prior to work to determine if aquatic features are located onsite and avoided when possible. Chemical treatment methods would be minimized within 15-feet of aquatic features, including riparian areas and wetlands, when possible. Treatment of target pest plants on stream banks would require use of chemical treatments in order to avoid creating stream bank erosion resulting from more disruptive manual treatments and with the overall purpose of protecting riparian habitats.

Conclusion

Manual and mechanical activities would result in the replacement of riparian trees that are removed under the Streambed Alteration Agreement and would not significantly impact riparian or other sensitive communities. Treatment of target pest plants on stream banks would require use of chemical treatment in order to avoid creating stream bank erosion resulting from manual treatments and with the overall purpose of protecting riparian habitats. Therefore, overall impacts to riparian or other sensitive natural communities would be **less than significant**.

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