



City of Gilroy

John Doughty
Public Works Director

PUBLIC WORKS DEPARTMENT

7351 Rosanna Street, Gilroy, CA 95020

MAIN (408) 846-0223

www.cityofgilroy.org

NOTICE OF EXEMPTION

Project Description:

The City of Gilroy (City), as the California Environmental Quality Act (CEQA) Lead Agency, proposes the Lions Creek Trail West Project (proposed project), which will convert an existing unpaved maintenance road atop a levee on the north side of Lions Creek, that is closed to the public to a multiuse public trail for use by bicyclists and pedestrians. Specifically, the project is located along an existing maintenance road on the top of the north levee for Lions Creek, south of Day Road E and Christopher Highschool, west of Santa Teresa Boulevard, on Assessor's Parcel Number (APN) 783-16-027 in the City.

The trail would be operated and maintained by the City through a joint use agreement with the Santa Clara Valley Water district (SCVWD). Disturbed overland and regraded drainage swale areas would be hydroseeded with native seed mix. The trail is identified in the City's Trails Master Plan. Proposed project improvements include paving the existing maintenance road per the City's Trails Master Plan trail standards; installing fencing between the roadway and the trail per SCVWD and City standards; hydroseeding disturbed areas adjacent to the trail; and installing trail signage at access points. The trail would be constructed in compliance with Americans with Disabilities Act (ADA) requirements.

The trail segment would begin at the north side of the newly constructed Christopher High School pedestrian and bicycle bridge (just south of the Cougar Court terminus) and end at the Santa Teresa Boulevard and Day Road intersection. The proposed project would help complete the connection between the high school and the existing pedestrian and bicycle facilities on Santa Teresa Boulevard. This trail segment would consist of constructing approximately 1,900 linear feet of a 10-foot wide to 12-foot-wide hot mix asphalt path serving both pedestrians and bicyclists located on the north side of Lions Creek. Shoulders would be 2-foot-wide unpaved aggregate base. Construction is anticipated to commence in Summer 2026 and last approximately 6-months.

Finding: The Engineering Division has reviewed the project and found it to be exempt from the provisions of the California Environmental Quality Act (CEQA).

- Ministerial Project
- Categorical Exemption
- Statutory Exemption
- Emergency Project
- Quick Disapproval [CEQA Guidelines, 14 Cal. Code of Regs. 15270]

- No Possibility of Significant Effect [CEQA Guidelines, 14 Cal. Code of Regs. 15061(b)(3)]

Supporting Reasons:

The project qualifies for a Categorical Exemption under Section 15301 (Existing Facilities) of the California Environmental Quality Act (CEQA) Guidelines. Improvements associated with the project would occur at an existing maintenance road between existing pedestrian and bicycle facilities to the west, and an existing intersection to the east, in the City of Gilroy. The project would include improvements to streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities consistent with Section 15301(c). The project would not result in cumulative impacts, significant impacts to the environment due to unusual circumstances, impacts on a scenic highway, and impacts to historical resources. The project is not located on a hazardous waste site. The project would not meet any of the exceptions (Section 15300.2) for not qualifying for environmental clearance under a Categorical Exemption. Therefore, the project is categorically exempt from CEQA under 14 CCR 15301.

02/19/2026

(Date)



Shaun Wright, Engineer I

CATEGORICAL EXEMPTION JUSTIFICATION

CEQA LEAD AGENCY: City of Gilroy

DATE: February 13, 2026

SUBJECT: CEQA Exemption Justification for the Lions Creek Trail West Project

1. Introduction

The City of Gilroy (City), as the California Environmental Quality Act (CEQA) Lead Agency, proposes the Lions Creek Trail West Project (proposed project), which would convert an existing unpaved maintenance road atop a levee on the north side of Lions Creek, that is closed to the public, to a multiuse public trail for use by bicyclists and pedestrians. The trail would be operated and maintained by the City through a joint use agreement with the Santa Clara Valley Water District (SCVWD). The trail is identified in the City's Trails Master Plan (City 2005).

The proposed project is considered exempt per CEQA Guidelines Article 19, Categorical Exemptions (CEs), Section 15301, Existing Facilities. The purpose of this memorandum is to document existing conditions and provide information to support the Notice of Exemption (NOE) under CEQA.

2. Project Location

The proposed project would be located along an existing maintenance road on the top of the north levee for Lions Creek, south of Day Road E and Christopher High School, west of Santa Teresa Boulevard, on Assessors' Parcel Number (APN) 783-16-027 in the City, within Santa Clara County. Figure 1 and Figure 2 show the location of the proposed project area on a regional and local basis, respectively (Attachment A, Figure 1 and Figure 2). The United States Geological Survey (USGS) Topo 7.5-minute map for the Gilroy Quadrangle (1982) indicated the project area is between approximately 220 feet and 230 feet above mean sea level (msl) (Attachment A, Figure 3).

3. Project Description

Implementation of the proposed project would include paving the existing maintenance road per the City's Trails Master Plan standards, installing fencing between the roadway and the trail per SCVWD and City standards, hydroseeding disturbed areas adjacent to the trail, and installing trail signage at access points.

The trail segment would begin at the north side of the newly constructed Christopher High School pedestrian and bicycle bridge (just south of the Cougar Court terminus) and end at the Santa Teresa Boulevard and Day Road intersection. The proposed project would help complete the connection between the high school and the existing pedestrian and bicycle facilities on Santa Teresa Boulevard. This trail segment would

consist of constructing approximately 1,900 linear feet of a 10-foot to 12-foot-wide hot mix asphalt path serving both pedestrians and bicyclists located on the north side of Lions Creek. Shoulders would be 2-feet-wide unpaved aggregate base. The trail would be constructed in compliance with Americans with Disabilities Act (ADA) requirements.

Construction is anticipated to commence in Summer 2026 and last approximately 6-months.

4. California Environmental Quality Act (CEQA) Analysis

Categorical Exemptions (CE) under CEQA represent activities that generally do not result in significant environmental impacts. The Secretary of the Resource Agency has established a list of classes of projects, which have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA, provided several exception criteria are met (CEQA Guidelines Sections 15300-15333). The proposed project would be eligible as a CE under Class 1, Existing Facilities (Section 15301(c)), projects involving minor alteration of existing public or private facilities involving negligible or no expansion of existing or former use. The Exemption Discussion table presented below discusses and provides justification for CEQA compliance with exception criteria listed under CEQA Guidelines Section 15300.

TABLE 1: Exemption Discussion	
EXEMPTION	DISCUSSION
(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.	The proposed project is exempt under Class 1. The proposed project would not fall under exempt class 3, 4, 5, 6, or 11.
(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.	The proposed project consists of converting an existing unpaved Lions Creek side maintenance road, that is closed to the public, to a multiuse public trail for use by bicyclists and pedestrians with improvements consistent with the City’s Trails Master Plan (City 2005). The proposed project would not increase vehicle capacity but would provide an alternative mode of transportation to Christopher High School. Therefore, the proposed project would not combine with past, present, or future projects in a way that would result in cumulative impacts. The proposed project is not cumulatively considerable.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The proposed project is within the boundary of the Santa Clara Valley Habitat Conservation Plan (SCVHCP), which was adopted by the Santa Clara Valley Habitat Agency in 2013. The City is an active partner in the Santa Clara Valley Habitat Agency, which is a Joint Powers Authority responsible for executing requirements of the Habitat Plan and creating a Reserve System for the benefit of covered species, natural communities, biological diversity, and ecosystem function. The SCVHCP provides broad-scale natural community and more detailed land cover mapping information throughout the City. The SCVHCP designates the project area as grassland and irrigated agriculture natural communities/land covers; however, the alignment of the proposed project is on top of an existing levee that is devoid of vegetation. The proposed project would be considered a covered activity under the Habitat Plan, in the urban development category (California Department of Fish and Wildlife [CDFW], 2026; Gilroy, 2020; Santa Clara Valley, 2013).

Review of the United States Fish and Wildlife Service (USFWS), California Natural Diversity Database (CNDDDB), and California Native Plant Society (CNPS) databases conducted for the proposed project determined that 25 special status wildlife species and 6 special status plant species could potentially occur in the project area (Attachment B).

On February 5, 2026, Dewberry biologist, Aren Der-Gevorgian, conducted a burrowing owl (*Athene cunicularia*) presence survey. Neither owls nor signs of owl pellets or owl whitewash were observed at the project area (Attachment C).

Disturbed overland and regraded drainage swale areas would be hydroseeded with native seed mix. Overall, biological resources would not be impacted by proposed project implementation.

The closest school, Christopher High School, is located to the north side of the project area. Proposed project construction would be temporary and would primarily occur while school is out of session, in the summer, to avoid peak traffic periods. The proposed project would improve pedestrian and bicycle facilities by providing a connection between existing facilities to the west and east of the project

	<p>area. This would make it safer for pedestrians and cyclists in the surrounding neighborhoods to travel to and from Christopher High School.</p> <p>The proposed project would convert an existing unpaved maintenance road atop a levee to a pedestrian and bicycle path. Since the proposed project area is approximately 46,958 square feet and creating new impervious surface due to the new asphalt path, the proposed project would be subject to the Central Coast Post-Construction Requirements. The proposed project would fit into the Tier 1 type of project since it would not create or replace 5,000 square feet, or more, of impervious surface area. Performance requirements for Tier 1 projects would be implemented as outlined in Regulatory Compliance Measure 5.1 (City, 2015).</p> <p>Mapping prepared by the California Division of Mines and Geology confirms that the proposed project area is not in an area known for ultramafic rock containing naturally occurring asbestos (NOA) (Department of Conservation [DOC], 2000). The handling of hazardous materials during construction activities would occur in accordance with applicable federal, state, and local law requirements. Implementation of standard construction best management practices (BMPs), compliance with vehicle manufacturer's specifications, and compliance with applicable regulations would address methods for containing accidental spills of toxic materials. Overall, impacts relating to hazards and hazardous materials due to proposed project implementation would not be significant.</p> <p>Sensitive receivers in the vicinity of the proposed project include single-family residences to the south of the project area. The project area is not within any airport noise contour. Construction noise would increase ambient noise levels in the short term, but construction noise would be intermittent. Furthermore, construction noise is exempt from the City code exceptions to exterior noise limits (30.41.31[c]). The construction contractor would comply with the noise Regulatory Compliance Measures, as outlined below in Section 5.2. Overall, noise impacts due to proposed project implementation would not be significant. Operational noise impacts would not be significant because the</p>
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TABLE 1: Exemption Discussion

EXEMPTION	DISCUSSION
	<p>noise would be generated by trail users, occur almost exclusively during daylight hours, result in lower noise levels than nearby vehicular traffic, and would be intermittent with peak use anticipated to occur in the morning prior to school starting and in the afternoon after school.</p> <p>The proposed project is not within or adjacent to tribal land or a designated cultural or historic area; however, it is within the historical cultural region of the Amah Mutsun Tribal Band of the Ohlone indigenous people. The proposed project would follow federal, state, and local regulations and Regulatory Compliance Measures as outlined below in Section 5.3 and 5.4.</p> <p>There are no unusual circumstances of concern involved with the proposed project. Significant effects would not occur to biological resources, cultural resources, nor to tribal cultural resources. Significant effects would also not occur due to hazardous materials or due to noise.</p>
<p>(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.</p>	<p>There are no visual or scenic resources in the project vicinity. There are also no officially designated or eligible scenic highways near the proposed project. The closest eligible scenic highway is approximately six miles southwest of the project area, State Route (SR) 152 (California Department of Transportation [Caltrans], 2019).</p>
<p>(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.</p>	<p>The review of EnviroStor and GeoTracker identified no hazardous materials sites directly associated with the project area. The proposed project is not located on a listed hazardous materials site. The closest active site is located approximately 1.88 miles southeast of the project area and would not affect the project area (Department of Toxic Substances Control [DTSC], 2025; State Water Resource Control Board [SWRCB], 2025).</p>

TABLE 1: Exemption Discussion

EXEMPTION	DISCUSSION
(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.	A California Historical Resources Information System (CHRIS) records search was conducted on December 12th, 2025, which identified no recorded cultural resources within the project area. The record search identified several previous reports of the project area; however, no cultural materials, prehistoric or historic were noted in the proposed project trail segment. Nevertheless, construction activities occurring in the project area requiring below surface excavation/trenching, could reveal previously undiscovered cultural resources. In the event this occurs, the construction contractor would comply with the cultural resource Regulatory Compliance Measures as outlined below in Section 5.3 and 5.4. Overall, historical and cultural resources would not be impacted by proposed project implementation.

5. Regulatory Compliance Measures

In addition to the measures identified in the sections above, the following regulatory compliance measures and/or BMPs would be included in bid packages and construction notices for implementation during construction.

5.1 Stormwater Management Guidance

The following control measures will be incorporated to meet stormwater management requirements:

- Limit disturbance of natural drainage features.
- Limit clearing, grading, and soil compaction.
- Minimize impervious surfaces.
- Minimize runoff by dispersing runoff to landscape or using permeable pavements

The project engineer will submit a stamped and signed copy of the “Performance Requirement No. 1 Site Design and Runoff Reduction Certification,” found in Appendix A of the Stormwater Management Guidance Manual for Low Impact Development & Post-Construction Requirements (City 2015), which states that low impact development design strategies are included in the project design.

5.2 Construction Noise Control

The following control measures will be incorporated to minimize noise disturbances at sensitive receivers during the project construction activities:

- Construction activities will be limited to weekdays between 7:00 a.m. and 7:00 p.m., and Saturdays between 9:00am and 7:00pm, with no construction allowed on Sunday or City holidays in compliance with Chapter 16, Offenses –

Miscellaneous, Section 38, Hours of Construction, of the Gilroy City Code of Ordinances.

- Locate stationary noise-generating equipment as far as possible from sensitive receivers.
- The construction contractor will use newer equipment with improved muffling and maintain equipment per the manufacturers' recommended guidelines (such as mufflers, engine enclosures, and engine vibration isolators intact and operational). Newer equipment will generally be quieter in operation than older equipment.
- Noise producing equipment that are regulated for noise output by a federal, state, or local agency will comply with such regulations throughout project construction.
- Prior to construction commencement, all construction equipment will be inspected to confirm proper maintenance and presence of noise control devices (e.g., mufflers and shrouding).
- The construction contractor will utilize electrically powered equipment instead of pneumatic or internal-combustion powered equipment where feasible.
- Staging areas will be located as far as practicable from noise sensitive receivers.
- Idling equipment will be turned off after five minutes.
- Nearby noise sensitive receivers will be notified of construction schedules so that arrangements can be made, if desired, to limit their short-term increases in ambient noise levels.

5.3 Unanticipated Cultural Materials

Per Caltrans Exhibit 5.1 in Volume 2 of the Standard Environmental Reference, it is Caltrans' policy to avoid cultural resources whenever possible. Further investigations may be needed if the site[s] cannot be avoided by the project. If previously unidentified cultural materials are unearthed during construction, it is Caltrans' policy that work be halted in that area until a qualified archaeologist can assess the significance of the find. Additional archaeological surveys will be needed if project limits are extended beyond the present survey limits.

5.4 Human Remains

If human remains are discovered during project activities, all activities in the vicinity of the find will be stopped and the County Sheriff-Coroner's Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the NAHC. Treatment of the remains shall be conducted in accordance with further directions of the County Coroner or the NAHC, as appropriate.

6. Determination

In accordance with CEQA, each public agency shall, in the course of establishing its own procedures, list those specific activities which fall within each of the exempt classes, subject to the qualification that these lists must be consistent with both the letter and the intent expressed in the classes.

Based on a review of the proposed project area, CEQA Guidelines, and the analysis above, the proposed project would meet the requirements of a CE under CEQA Section 15301(c).

7. References

- California Department of Fish and Wildlife (CDFW). 2026. NCCP Plan Summary – Santa Clara Valley Habitat Plan. Available Online: <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Santa-Clara#map>. Date Accessed: January 20, 2026.
- California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. Available Online: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Date Accessed: December 5, 2025.
- City of Gilroy. 2025. Chapter 16, Offences – Miscellaneous, Section 38, Hours of Construction. Available Online: <https://www.codepublishing.com/CA/Gilroy/#!/Gilroy16.html#16.38>. Date Accessed: February 12, 2026.
- City of Gilroy. 2025. Chapter 30, Zoning Ordinance, Article 41, Performance Standards, Section 31, Specific Provisions - Noise, Subsection C, Exceptions to Exterior Noise Limits. Available Online: <https://www.codepublishing.com/CA/Gilroy/#!/Gilroy30/Gilroy3041.html>. Date Accessed: February 12, 2026.
- City of Gilroy. 2020. 2040 General Plan. Available Online: <https://www.cityofgilroy.org/274/2040-General-Plan>. Date Accessed: December 5, 2025.
- City of Gilroy. 2005. Trails Master Plan. Available Online: <https://www.cityofgilroy.org/238/Master-Plans>. Date Accessed: December 5, 2025.
- Department of Conservation (DOC). 2000. A General Location Guide for Ultramafic Rocks in California. Available Online: <https://www.placer.ca.gov/DocumentCenter/View/1433/General-Location-Guide-PDF>. Date Accessed: December 5, 2025.
- Department of Toxic Substances Control (DTSC). 2025. EnviroStor; (37.035348, -121.600833). Available Online: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=37.035348%2C-121.600833>. Date Accessed: December 5, 2025.
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- Native Land Digital. 2025. Popeloutchom (Amah Mutsun). Available Online: <https://native-land.ca/listings/territories/mutsun>. Date Accessed: January 26, 2026.

Santa Clara County, Department of Planning and Development, County Surveyor's Office. 2025. Santa Clara County Surveyor Record Index. Available Online: https://experience.arcgis.com/experience/be2e1200b3c543909d27d8ef23483a15#data_s=id%3AdataSource_11-196b1da5952-layer-13%3A232822. Date Accessed: December 5, 2025.

Santa Clara Valley Habitat Agency. 2013. Santa Clara Valley Habitat Plan. Available Online: <https://scv-habitatagency.org/178/Santa-Clara-Valley-Habitat-Plan>. Date Accessed: January 20, 2026.

State Water Resource Control Board (SWRCB). 2025. GeoTracker; (37.035348, -121.600833). Available Online: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=37.035348%2C-121.600833>. Date Accessed: December 5, 2025.

8. Attachments

Attachment A: Figures

Attachment B: Special-Status Species Lists

Attachment C: Burrowing Owl Presence Survey Field Memorandum

ATTACHMENT A

Figure 1 – Regional Location

Figure 2 – Project Vicinity

Figure 3 – USGS 7.5 Minute Quadrangle

Regional Location



Lions Creek Trail Project
West Side
City of Gilroy, CA

Figure 1

Legend

- ★ Project Location
- Santa Clara County



Author: I. Ciraulo
Last updated on Friday, December 5, 2025







Project Vicinity

Lions Creek Trail Project
West Side
City of Gilroy, CA

Figure 2

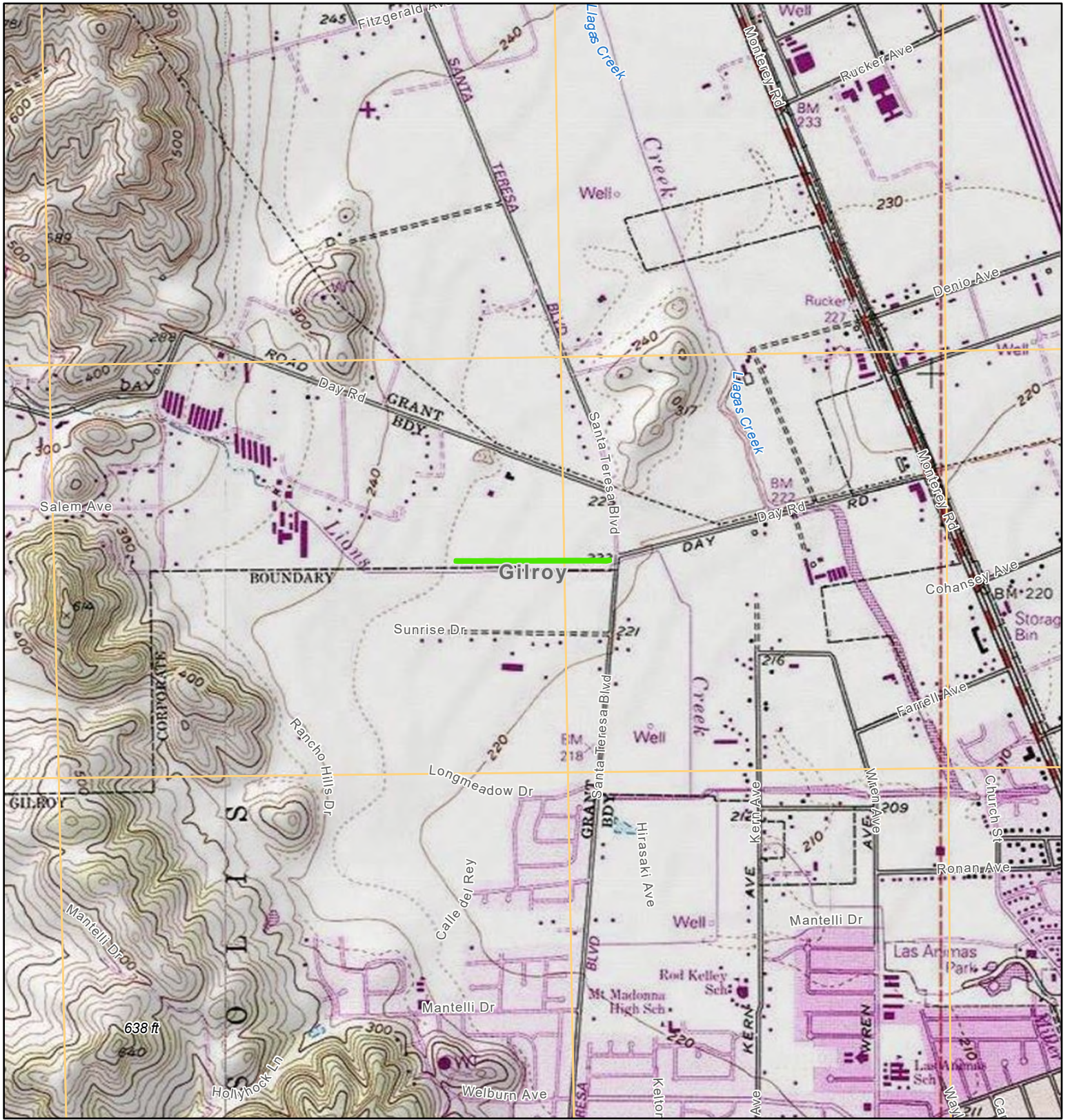
Legend

-  Project Area
-  Parcels
-  Gilroy City Limits
-  Urban Growth Boundary



Author: I. Ciraulo
Last updated on Friday, December 5, 2025





USGS 7.5 Minute Map

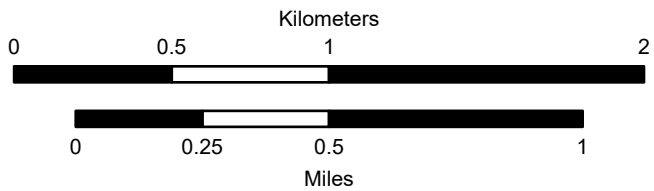
Figure 3

Gilroy, California 7.5-minute Quadrangle, 1982
 T10S, R03E, Section 25, 26
 Santa Clara County, CA

Legend

 Project Area

Author: I. Ciraulo
 Last updated on Friday, December 5, 2025



ATTACHMENT B
Special-Status Species Lists



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (San Felipe (3612184) OR Gilroy Hot Springs (3712114) OR Chittenden (3612185) OR Watsonville East (3612186) OR Mt. Madonna (3712116) OR Gilroy (3712115) OR Mt. Sizer (3712125) OR Mississippi Creek (3712124) OR Morgan Hill (3712126))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Actinemys marmorata</i> northwestern pond turtle	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
<i>Adela oplerella</i> Opler's longhorn moth	IILEE0G040	None	None	G2	S2	
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
<i>Ambystoma californiense pop. 1</i> California tiger salamander - central California DPS	AAAAA01181	Threatened	Threatened	G3T3	S3	WL
<i>Ammodramus savannarum</i> grasshopper sparrow	ABPBXA0020	None	None	G5	S3	SSC
<i>Aneides niger</i> Santa Cruz black salamander	AAAAD01070	None	None	G3	S3	SSC
<i>Anodonta californiensis</i> California floater	IMBIV04220	None	None	G3	S2?	
<i>Antrozous pallidus</i> pallid bat	AMACC10010	None	None	G4	S3	SSC
<i>Aquila chrysaetos</i> golden eagle	ABNKC22010	None	None	G5	S3	FP
<i>Arctostaphylos andersonii</i> Anderson's manzanita	PDERI04030	None	None	G2	S2	1B.2
<i>Arctostaphylos pajaromensis</i> Pajaro manzanita	PDERI04100	None	None	G1	S1	1B.1
<i>Ardea herodias</i> great blue heron	ABNGA04010	None	None	G5	S4	
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
<i>Balsamorhiza macrolepis</i> big-scale balsamroot	PDAST11061	None	None	G2	S2	1B.2
<i>Bombus caliginosus</i> obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	
<i>Bombus crotchii</i> Crotch's bumble bee	IIHYM24480	None	Candidate Endangered	G2	S2	
<i>Bombus occidentalis</i> western bumble bee	IIHYM24252	None	Candidate Endangered	G3	S1	
<i>Buteo swainsoni</i> Swainson's hawk	ABNKC19070	None	Threatened	G5	S4	



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Castilleja affinis</i> var. <i>neglecta</i> Tiburon paintbrush	PDSCR0D013	Endangered	Threatened	G4G5T1T2	S1S2	1B.2
<i>Castilleja rubicundula</i> var. <i>rubicundula</i> pink creamsacs	PDSCR0D482	None	None	G5T2	S2	1B.2
<i>Ceanothus ferrisiae</i> Coyote ceanothus	PDRHA041N0	Endangered	None	G1	S1	1B.1
<i>Centromadia parryi</i> ssp. <i>congdonii</i> Congdon's tarplant	PDAST4R0P1	None	None	G3T2	S2	1B.1
<i>Chlorogalum pomeridianum</i> var. <i>minus</i> dwarf soaproot	PMLIL0G042	None	None	G5T3	S3	1B.2
<i>Chorizanthe pungens</i> var. <i>pungens</i> Monterey spineflower	PDPGN040M2	Threatened	None	G2T2	S2	1B.2
<i>Cirsium fontinale</i> var. <i>campylon</i> Mt. Hamilton thistle	PDAST2E163	None	None	G2T2	S2	1B.2
<i>Clarkia concinna</i> ssp. <i>automixa</i> Santa Clara red ribbons	PDONA050A1	None	None	G5?T3	S3	4.3
<i>Collinsia multicolor</i> San Francisco collinsia	PDSCR0H0B0	None	None	G2	S2	1B.2
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
<i>Delphinium californicum</i> ssp. <i>interius</i> Hospital Canyon larkspur	PDRAN0B0A2	None	None	G3T3	S3	1B.2
<i>Dicamptodon ensatus</i> California giant salamander	AAAAH01020	None	None	G2G3	S2S3	SSC
<i>Dudleya abramsii</i> ssp. <i>setchellii</i> Santa Clara Valley dudleya	PDCRA040Z0	Endangered	None	G4T2	S2	1B.1
<i>Elanus leucurus</i> white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
<i>Eryngium aristulatum</i> var. <i>hooveri</i> Hoover's button-celery	PDAPI0Z043	None	None	G5T1	S1	1B.1
<i>Euphydryas editha bayensis</i> Bay checkerspot butterfly	IILEPK4055	Threatened	None	G4G5T1	S3	
<i>Extriplex joaquinana</i> San Joaquin spearscale	PDCHE041F3	None	None	G2	S2	1B.2
<i>Fritillaria liliacea</i> fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
<i>Gonidea angulata</i> western ridged mussel	IMBIV19010	None	None	G3	S2	
<i>Hesperoleucus venustus subditus</i> southern coastal roach	AFCJB19032	None	None	GNRT2	S2	SSC
<i>Hoita strobilina</i> Loma Prieta hoita	PDFAB5Z030	None	None	G2?	S2?	1B.1



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Holocarpha macradenia</i> Santa Cruz tarplant	PDAST4X020	Threatened	Endangered	G1	S1	1B.1
<i>Icteria virens</i> yellow-breasted chat	ABPBX24010	None	None	G5	S4	SSC
<i>Lanius ludovicianus</i> loggerhead shrike	ABPBR01030	None	None	G4	S4	SSC
<i>Lasiurus cinereus</i> hoary bat	AMACC05032	None	None	G3G4	S4	
<i>Lavinia exilicauda harengus</i> Monterey hitch	AFCJB19013	None	None	G4T3	S3	SSC
<i>Legenere limosa</i> legenere	PDCAM0C010	None	None	G2	S2	1B.1
<i>Leptosyne hamiltonii</i> Mt. Hamilton coreopsis	PDAST2L0C0	None	None	G2	S2	1B.2
<i>Lessingia micradenia var. glabrata</i> smooth lessingia	PDAST5S062	None	None	G2T2	S2	1B.2
<i>Malacothamnus arcuatus var. arcuatus</i> arcuate bushmallow	PDMAL0Q0E0	None	None	GNRT2	S2	1B.2
<i>Malacothamnus hallii</i> Hall's bushmallow	PDMAL0Q0F0	None	None	G2	S2	1B.2
<i>Microcina homi</i> Hom's micro-blind harvestman	ILARA47020	None	None	G1	S2	
<i>Monolopia gracilens</i> woodland woollythreads	PDAST6G010	None	None	G3	S3	1B.2
<i>Navarretia prostrata</i> prostrate vernal pool navarretia	PDPLM0C0Q0	None	None	G2	S2	1B.2
<i>Neotoma fuscipes annectens</i> San Francisco dusky-footed woodrat	AMAFF08082	None	None	G5T2T3	S2S3	SSC
<i>Oncorhynchus mykiss irideus pop. 9</i> steelhead - south-central California coast DPS	AFCHA0209H	Threatened	None	G5T2Q	S2	SSC
<i>Optioservus canus</i> Pinnacles optioservus riffle beetle	IICOL5E020	None	None	G2	S1	
<i>Penstemon rattanii var. kleei</i> Santa Cruz Mountains beardtongue	PDSCR1L5B1	None	None	G4T2	S2	1B.2
<i>Phacelia phacelioides</i> Mt. Diablo phacelia	PDHYD0C3Q0	None	None	G2G3	S2S3	1B.2
<i>Phrynosoma blainvillii</i> coast horned lizard	ARACF12100	None	None	G4	S4	SSC
<i>Plagiobothrys glaber</i> hairless popcornflower	PDBOR0V0B0	None	None	GX	SX	1A
<i>Puccinellia simplex</i> California alkali grass	PMPOA53110	None	None	G2	S2	1B.2



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Rana boylei</i> pop. 4 foothill yellow-legged frog - central coast DPS	AAABH01054	Threatened	Endangered	G3T2	S2	
<i>Rana draytonii</i> California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
<i>Ravenella exigua</i> chaparral harebell	PDCAM020A0	None	None	G2	S2	1B.2
<i>Riparia riparia</i> bank swallow	ABPAU08010	None	Threatened	G5	S3	
<i>Sanicula saxatilis</i> rock sanicle	PDAPI1Z0H0	None	Rare	G2	S2	1B.2
<i>Serpentine Bunchgrass</i> Serpentine Bunchgrass	CTT42130CA	None	None	G2	S2.2	
<i>Streptanthus albidus ssp. albidus</i> Metcalf Canyon jewelflower	PDBRA2G011	Endangered	None	G2T1	S1	1B.1
<i>Streptanthus albidus ssp. peramoenus</i> most beautiful jewelflower	PDBRA2G012	None	None	G2T2	S2	1B.2
<i>Streptanthus callistus</i> Mt. Hamilton jewelflower	PDBRA2G0A0	None	None	G1	S1	1B.2
<i>Sycamore Alluvial Woodland</i> Sycamore Alluvial Woodland	CTT62100CA	None	None	G1	S1.1	
<i>Taxidea taxus</i> American badger	AMAJF04010	None	None	G5	S3	SSC
<i>Trifolium buckwestiorum</i> Santa Cruz clover	PDFAB402W0	None	None	G2	S2	1B.1
<i>Trifolium hydrophilum</i> saline clover	PDFAB400R5	None	None	G2	S2	1B.2
<i>Vireo bellii pusillus</i> least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S3	
<i>Vulpes macrotis mutica</i> San Joaquin kit fox	AMAJA03041	Endangered	Threatened	G4T2	S3	

Record Count: 75

ATTACHMENT C
Burrowing Owl Presence Survey
Field Memorandum

FIELD MEMORANDUM

DATE: February 5, 2026

PROJECT: Lions Creek Trail West

SUBJECT: Burrowing Owl Survey

TIME: 6:30 – 10:00 AM

WEATHER CONDITIONS: Clear, calm winds, 31 degrees F

SURVEYOR: Aren Der-Gevorgian, Dewberry

Methods

Dewberry biologist Aren Der-Gevorgian conducted a burrowing owl (*Athene cunicularia*) presence survey, on the morning of February 5, 2026. The survey was located along Lions Creek in Gilroy, CA, from the intersection of Day Road and Santa Teresa Boulevard to the newly constructed Christopher High School pedestrian and bicycle bridge at Tapestry Drive. The survey was conducted on foot using 10x42 power binoculars to scan for visual observations focused on detecting burrowing owl individuals, behavior indicative of burrow use, and potential breeding behavior. The ground surface was also surveyed for presence of potential burrows.

Results

No owls were observed. Between 10 and 15 vacant ground squirrel burrows were observed along the upper banks of the creek. No signs of owl pellets or whitewash were observed outside any of the burrows.

Although the survey area was fenced off, high level of pedestrian traffic was observed during the survey period, due to its proximity to surrounding suburban neighborhoods and Christopher High School.

Wildlife species observed within the survey area included American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), red-winged blackbird (*Agelaius phoeniceus*), sierran treefrog (*Pseudacris sierra*), and white-crowned sparrow (*Zonotrichia leucophrys*).

Recommendations

None.