



# **SANTA CLARA VALLEY OPEN SPACE AUTHORITY**

## **NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING FOR THE INTEGRATED PEST MANAGEMENT PROGRAM**

**Date:** October 17, 2019

**To:** Responsible Agencies, Trustee Agencies, and Interested Persons

**RE:** Notice of Preparation of a Draft Program Environmental Impact Report for the Integrated Pest Management Program

The Santa Clara Valley Open Space Authority (Authority) proposes to implement an Integrated Pest Management (IPM) Program to comprehensively direct management of all pests on Authority open space preserves (preserves). The IPM Program is intended to formalize guidelines and procedures for the careful management of pests throughout the Authority's preserves while protecting natural resources and public health.

The Authority is in the process of preparing an IPM Guidance Manual (IPM Manual) to lay out the overall approach of the IPM Program. The IPM Manual will be an objective evaluation tool and process to effectively and efficiently make pest management decisions while providing for safe recreational use of the preserves and protecting their natural and cultural resources.

In accordance with the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.), the Authority has determined that the proposed IPM Program will require preparation of a Programmatic Environmental Impact Report (PEIR). The Authority will serve as the lead agency for CEQA compliance. The purpose of this Notice of Preparation (NOP) is to provide an opportunity for the public, interested parties, and public agencies to comment on the scope and proposed content of the PEIR. This NOP initiates the CEQA scoping process. A hard-copy of the NOP is available for public review at:

**Santa Clara Valley Open Space Authority  
33 Las Colinas Lane  
San Jose, CA 95119**

The NOP is also available for public review online at: [www.openspaceauthority.org/IPM](http://www.openspaceauthority.org/IPM)

33 Las Colinas Lane  
San Jose, CA 95119  
408.224.7476 T  
408.224.7548 F  
[openspaceauthority.org](http://openspaceauthority.org)

## PROVIDING COMMENTS ON THIS NOTICE OF PREPARATION

Agencies and interested parties may provide the Authority with written and/or email comments on topics to be addressed in the PEIR for the IPM Program. Because of time limits mandated by State law, comments must be received by **5:00 p.m. on November 18, 2019**. Please send all comments on the NOP by mail or email to:

**Santa Clara Valley Open Space Authority  
33 Las Colinas Lane  
San Jose, CA 95119**

**Attn: Galli Basson, Resource Management Specialist  
Phone: (408) 224-7476  
E-mail: [gbasson@openspaceauthority.org](mailto:gbasson@openspaceauthority.org)**

Comments provided by email should include "IPM Program NOP Scoping Comment" in the subject line, and the name and physical address of the commenter in the body of the email. If you are from an agency that will need to consider the PEIR when deciding whether to issue permits or other approvals for the project, please provide the name of a contact person.

All comments on environmental issues received during the public comment period will be considered and addressed in the Draft PEIR, which is anticipated to be available for public review in early 2020.

### Focus of Input

The Authority relies on responsible and trustee agencies to provide information relevant to the analysis of resources falling within their jurisdiction. The Authority encourages input for the proposed PEIR, with a focus on the following topics:

- ▶ **Scope of Environmental Analysis.** Guidance on the scope of analysis for this PEIR, including identification of specific issues that will require closer study due to the location, scale, and character of the IPM Program;
- ▶ **Mitigation Measures.** Ideas for feasible mitigation, including mitigation that could potentially be imposed by the Authority and that would avoid, eliminate, or reduce potentially significant or significant impacts;
- ▶ **Alternatives.** Suggestions for alternatives to the IPM Program that could potentially reduce or avoid potentially significant or significant impacts; and
- ▶ **Interested Parties.** Identification of public agencies, public and private groups, and individuals that the Authority should notice regarding the IPM Program and the accompanying PEIR.

## PUBLIC SCOPING MEETING

The Authority will conduct a public scoping meeting to inform interested parties about the project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the PEIR. The public scoping meeting is scheduled for the following time and location:

**October 29, 2019; 6:00 p.m. to 8:00 p.m.; Presentation at 6:30 p.m.**

**Santa Clara Valley Open Space Authority Boardroom  
33 Las Colinas Lane  
San Jose, CA 95119**

The meeting space is accessible to persons with disabilities. Individuals needing special assistive devices will be accommodated to the Authority's best ability. For more information, please contact Annelyse Dok at (408) 224-7476 at least 48 hours before the meeting.

## PROGRAM LOCATION

The Authority has preserved over 25,000 acres of open space, natural areas, watersheds, and wildlife habitat in the cities of Campbell, Milpitas, Morgan Hill, San Jose, and Santa Clara and the unincorporated areas of Santa Clara County. The IPM Program Area includes the 14 open space preserves currently owned and managed by the Authority, totaling 16,197 acres across Santa Clara County (Figure 1), and excludes any publicly or privately-owned lands over which the Authority holds an easement. The preserves included in the IPM Program are described in Table 1.

**Table 1 Authority Preserves Included in the IPM Program Area**

Preserve Name	Acres	Public Access Status
Coyote Ridge	1,832	Closed
Coyote Valley	348	Open
Croy Redwoods	116	Closed
Diablo Foothills	834	Closed
El Toro Preserve	39	Closed
Mount Chual	626	Closed
Pajaro River Agricultural Preserve – South	183	Closed
Pajaro River Agricultural Preserve – North	101	Closed
Palassou Ridge	3,524	Closed
Rancho Canada del Oro	4,733	Open
Santa Teresa Ridge	53	Closed
Santa Teresa Foothills	9	Closed
Sierra Vista	1,556	Open
Upper Uvas	1,216	Closed
Little Uvas	276	Closed

Note: Pajaro River Agricultural Preserve South and North are considered one preserve.

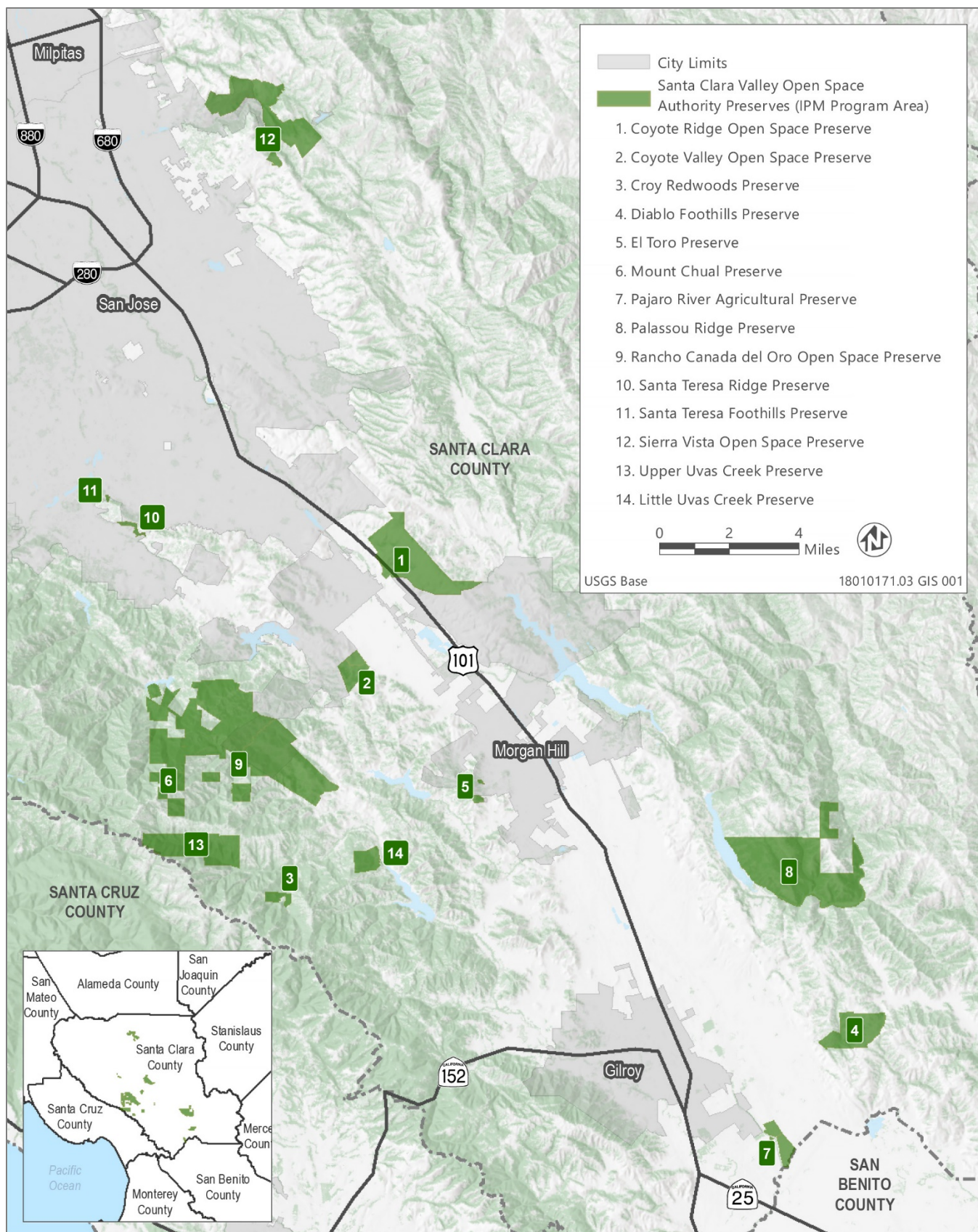


Figure 1 IPM Program Area

## PROGRAM DESCRIPTION

The overall goal of the IPM Program is to effectively manage pests in the Authority's open space preserves and facilities, while protecting human health and environmental quality. Specific objectives of the proposed IPM Program include the following:

- ▶ Develop and implement site-specific pest management strategies that are effective in controlling targeted pests while avoiding damage to natural resources, promoting visitor safety and enjoyment, and protecting human health;
- ▶ Keep the interested public informed about treatment strategies, upcoming projects, and environmental and public health protection measures;
- ▶ Inhibit the establishment of new invasive species on Authority preserves, such as new invasive plants in natural areas, rangelands, and agricultural properties;
- ▶ Maintain an inventory of invasive species infestations, monitor treatment effectiveness, and incorporate relevant monitoring results into future treatment applications;
- ▶ Implement an adaptive management framework to promote the long-term effectiveness of pest management activities; and
- ▶ Develop and implement an IPM Program Guidance Manual (IPM Manual) to standardize pest management and IPM procedures.

To achieve these objectives, the Authority is preparing an IPM Manual to facilitate the design and implementation of pest management strategies that are effective in controlling target pests, cost-effective, safe for human health, and protective of natural resources, including native species, special-status species, and water quality. The IPM Manual is being developed based on review of existing scientific literature and plans documenting best approaches to effective pest management, as well as pest management approaches that have been successfully implemented by the Authority over the past several decades. The main components of the IPM Program are identifying the target species and understanding their life cycle, assessing distribution and abundance of pests, setting thresholds for targeted control, assessing site conditions to identify appropriate treatments, using the most benign suite of control methods to target the most vulnerable stage in a pest's life cycle, and preventing pest problems through early detection and rapid response programs.

Given the varied landscapes in which pests could occur, and that pest management techniques are rapidly evolving through scientific research and technical innovations, the IPM Manual outlines approaches for different IPM management categories, which include natural lands, agricultural lands, recreational facilities, and building and structures. A variety of methods can be used to manage pest plants and animals in these environments, including:

- ▶ manual treatments,
- ▶ mechanical treatments,
- ▶ biological treatments, and
- ▶ chemical treatments.

To treat invasive plants, specific treatment methods include: pulling and digging by hand, cutting, mowing, weed whipping, tarping, mulching, release of a biological control agent (e.g., an insect) that targets an invasive plant species, and herbicide application. For management of animal pests, the following techniques are proposed: prevention and habitat modification, physical barriers and trapping, sanitation, and chemical control as a last resort (e.g., insecticidal soap, boric acid bait, diatomaceous earth, or rodenticide). The use of herbicides and rodenticides under the IPM Program would be regulated by the U.S. Environmental Protection Agency, the California Environmental Protection Agency, and the California Department of Pesticide Regulation.

## POTENTIAL ENVIRONMENTAL EFFECTS

As required by CEQA, the PEIR will describe existing conditions and evaluate the potential environmental effects of the proposed IPM Program and a reasonable range of alternatives, including the no-project alternative. It will address direct, indirect, and cumulative effects. The PEIR will identify feasible mitigation measures, if available, to reduce potentially significant impacts. At this time, the Authority has identified a potential for environmental effects in the areas identified below:

- ▶ Biological Resources,
- ▶ Hazards and Hazardous Materials,
- ▶ Hydrology and Water Quality,
- ▶ Aesthetics, and
- ▶ Recreation.

The PEIR will evaluate all environmental topic areas included in State CEQA Guidelines, including the topics identified above. Feasible and practicable mitigation measures will be recommended to reduce any identified potentially significant and significant impacts.

## ALTERNATIVES TO BE EVALUATED IN THE PEIR

In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the PEIR will describe a range of reasonable alternatives to the proposed IPM Program that are capable of meeting most of the objectives and would avoid or substantially lessen one or more significant effects of the IPM Program. The PEIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The PEIR will provide an analysis of the No Project Alternative and will also identify the environmentally superior alternative.