

DRAFT

**Joseph D. Grant County Park Master Plan Amendment
Initial Study/ Mitigated Negative Declaration
Santa Clara County, California**

Prepared for:

County of Santa Clara Parks and Recreation Department

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Report Date: September 4, 2020

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ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
AADT	Average Annual Daily Traffic
AB	Assembly Bill
ADA	Americans with Disabilities Act
Amendment	Joseph D. Grant County Park Master Plan Amendment
AQP	air quality plan
AR	Agricultural Ranchlands
ARB	California Air Resources Board
AR-sr	Agricultural Ranchlands with Scenic Roads
ATV	all-terrain vehicle
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CP ₂ e	carbon dioxide equivalent
County	County of Santa Clara
County Parks	County of Santa Clara Parks and Recreation Department
dB	decibel
dBA	A-weighted decibel
EPA	United States Environmental Protection Agency
FGC	Fish and Game Code
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
General Plan	Santa Clara County General Plan
GHG	greenhouse gas
L _{dn}	day/night sound level
L _{max}	maximum instantaneous noise level

Acronyms and Abbreviations

LOS	Level of Service
IS/MND	Initial Study/Mitigated Negative Declaration
MBTA	Migratory Bird Treaty Act
MRP	Municipal Regional Permit
MT	metric ton
NAHC	Native American Heritage Commission
NPDES	National Pollution Discharge Elimination System
NWIC	Northwest Information Center
Park	Joseph D. Grant County Park
PM _{2.5}	particulate matter less than 2.5 microns
PM ₁₀	particulate matter less than 10 microns
RPZ	Root Protection Zone
SCCSD	Santa Clara County Sheriff's Department
SCVHP	Santa Clara Valley Habitat Plan
SMARA	Surface Mining and Reclamation Act
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCR	tribal cultural resource
USFWS	United States Fish and Wildlife Service
UTV	utility task vehicle

SECTION 1: INTRODUCTION

Joseph D. Grant County Park (Park) is the largest county park in Santa Clara County’s park system stretching over 10,882 acres and offering a variety of recreational activities to visitors. In 2012, the County of Santa Clara Parks and Recreation Department (County Parks) acquired the 1,155-acre Sulphur Springs Ranch adjacent to the Park’s southeastern boundary. For the purposes of this document, this new parkland will be referred to as the “Amendment area.” Although the Amendment area has not opened for public use yet, the acquisition has expanded overall acreage of the Park to just over 12,000 acres.

In 2018, County Parks began developing an amendment to the 1993 Joseph D. Grant County Park Master Plan (Master Plan Amendment) to study and propose recommendations for public use of the Amendment area and provide plans for trail and road circulation, parking, staging, and backpack camping.

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Master Plan Amendment in an area located eight miles west of the City of San José in Santa Clara County, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, County of Santa Clara (County) is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the Master Plan Amendment. The intended use of this document is to determine the level of environmental analysis required to adequately evaluate the Master Plan Amendment and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the Amendment area location and the characteristics of the proposed Master Plan Amendment. Section 2 includes an environmental checklist giving an overview of the potential impacts that may result from implementation of the Master Plan Amendment. Section 3 elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

1.2 - Amendment Area Location

The Park is located eight miles east of downtown San José in the Western Diablo Range foothills of eastern Santa Clara Valley, a subsection of the California Coast Ranges, as shown in Exhibit 1. The Master Plan Amendment addresses the need to provide access to the area of the Park known as Sulphur Springs Ranch at the easternmost portion of the Park, as shown in Exhibit 2.

1.3 - Environmental Setting

The elevation at the Park entrance is at approximately 1,600 feet, while the southern boundary is at approximately 1,240 feet, and the easternmost park boundary reaches a height of 3,960 feet. The local climate is characterized as Mediterranean with cool wet winters and hot dry summers. Annual

precipitation is 25-27 inches. Winter temperatures typically reach a low of 30°F (degrees Fahrenheit), while summer months reach highs above 90°F. Nearby landmarks include Mount Hamilton, the University of California's Blue Oak Ranch Reserve, and the Lick Observatory. The Lick Observatory property is located to the north of the Amendment area, as shown in Exhibit 3.

Halls Valley and the high ridges that rim the valley define the natural landscape of the Park. Several historic structures in the Park date to when the land was used for grazing cattle and recreational hunting. Historic and cultural resources are discussed further in Section 2E: Cultural/Historical/Archaeological Resources.

1.4 - Project Description

The Master Plan Amendment would provide for public use and access of the former Sulphur Springs Ranch by creating two new backpack camps for use by backpackers: Sulphur Springs Ranch Backpack Camp and Valley Oak Backpack Camp. The Master Plan Amendment would also include construction of required infrastructure to support the proposed camping uses and trail access, including trails connecting Sulphur Springs Ranch to the existing trail system of Joseph D. Grant County Park. Therefore, the proposed Master Plan Amendment project includes both the uses in the former Sulphur Springs Ranch and within the existing boundaries of Joseph Grant Park. The location of the camps, access roads, trails, and trail crossings are depicted in Exhibit 3. One of the trails, the extension of the Manzanita Trail, is located outside the former Sulphur Springs Ranch, but within the existing park boundaries. Development would include installation of a backcountry vault toilet at the Sulphur Springs Ranch Backpack Camp and improvements to the ranch road leading from State Route 130 (Mount Hamilton Road) to Sulphur Springs Ranch Backpack Camp. This access road would allow for passage of a pumper truck to service the toilet.

The County conducted an extensive public process to identify the types of improvements desired for the Master Plan Amendment; as part of this planning process, year-round camping was added. The County anticipates an additional 1,000 campers per year would use the new camps, as well as an increase in the number of hikers and other day visitors to the Sulphur Springs Ranch area.

1.4.1 - Physical Site Improvements

In addition to backpack camps, new trails would be constructed or created using existing ranch roads. Descriptions of physical features and construction methods of the camps, supporting infrastructure, the backcountry toilet, trails, trail crossings, and roads follows. All proposed improvements are shown on Exhibit 3.

Staging Area

An existing staging area, Stockman's Group Picnic Area, would be utilized as staging for overnight visitors who have reservations at one of the new backpack camps. Rangers would register campers and their cars at this location. The Stockman's Group Picnic Area is located near the main Park entrance and includes a permanent restroom building and numerous parking stalls. It would be an approximately 6-mile hike from this access point to the proposed camps.

Day-use visitors may use any existing parking lot within the Park for staging. Visitors seeking a shorter hike to the camps could access the Amendment area via the Twin Gates Staging Area. It would be an approximately 2-mile hike from this staging area to the proposed camps.

Backcountry Toilet

A new toilet would be added at the Sulphur Springs Ranch Backpack Camp. The backcountry toilet would be a vault-type toilet. The proposed model is a single-user, waterless facility, housed in a prefabricated building that is compliant with the Americans with Disabilities Act (ADA). The building would rest upon a concrete pad, and waste would be captured and stored in a vault chamber beneath the concrete pad. The vault, with a capacity of 750 gallons, would require periodic pumping to remove waste and accommodate up to 13,000 uses between pumping. Pumper truck access would be provided via the existing ranch road that connects the Sulphur Springs Ranch vehicular gate to Mount Hamilton Road. A pumping service would be contracted to pump and haul waste for disposal at a local wastewater treatment plant, under permitting authority from the County of Santa Clara Solid Waste Program. Site improvements would include an 80-foot diameter turnaround to be constructed of road base (12-inch class II aggregate base) and would also include widening the existing road base to 12 feet. A 10-foot wide segment of road base would connect the turnaround with the vault toilet building to provide direct access to the facility for toilet pumping service.

The backcountry toilet at the Sulphur Springs Ranch Backpack Camp would be located within a short walking distance of the group campsite. Walking distances to the toilet would range from 300 feet from the nearest campsite to 2,000 feet from the farthest campsite within Sulphur Springs Ranch Backpack Camp. Campers at the Valley Oak Backpack Camp would have an approximately one-mile hike to the toilet. To preserve visual integrity of the backpack camps, the toilet building would be screened from direct view by the existing tree canopy. The building and toilet vault would be placed beyond the root zone of existing trees to minimize impact.

New Campsites

The campsites at Sulphur Springs Ranch and Valley Oak backpack camps would each have a flat pad of compacted native soil that is cleared of vegetation and gently sloped to provide downhill drainage. Cook stove pads may be of concrete or wood material, and would be a minimum of 18 to 24 inches in height, 18 inches in diameter, and embedded a minimum of 16 inches.¹ Food lockers would be of prefabricated metal construction and installed with a subgrade concrete footing. Logs for cook stove pads or benches may be sourced from material on-site or other parks within the County. Construction of camps would require manual grading and pad compaction.

Sulphur Springs Ranch Backpack Camp

Sulphur Springs Ranch Backpack Camp would be located on a grassy hilltop in the northwest Amendment area. The site is distinguished by gently rolling topography, blue oak trees, foothill pines, and grassland. Sulphur Springs Ranch Backpack Camp would offer seven campsites within an approximately nine-acre area. There would be six individual sites and one larger group site. The

¹ Wooden cook pads would be embedded a minimum of 16 inches, which includes four inches of compacted aggregate base.

campsites would have a minimum 180-foot setback from each adjacent campsite to maintain a high-quality user experience.

Individual campsites would feature a flat area of compacted earth, metal food locker (15 cubic feet), log bench, and an embedded pad for camp stove cooking. Of the six individual sites, five are designed to accommodate up to four people, and are approximately 230 square feet each. The sixth individual site would have a concealed location on a terrace along a steep slope beneath a blue oak tree and could accommodate a maximum of two people. This sixth site is 112 square feet.

The group campsite would be ADA-accessible and feature a large, flat area (approximately 1,300 square feet) of compacted earth. The group campsite would be designed to accommodate up to ten individuals, three ADA-accessible metal food lockers (30 cubic feet), five log benches, and five cook stove pads (including one ADA-accessible cook pad).

Amenities of the individual campsites would be laid out in a rectilinear configuration while the group campsite would utilize a circular configuration. All campsites would be oriented toward the viewshed, taking care to install food lockers in areas that would prevent visual interruptions.

Valley Oaks Backpack Camp

The Valley Oak Backpack Camp would be more remotely situated, located approximately one mile directly east of the Sulphur Springs Ranch Backpack Camp. This campsite would be located on a terrace in a steep hillside approximately 250 feet above Smith Creek and distinguished by the valley oaks for which the camp is named. The site is a long, narrow, relatively flat terrace nearly 900 feet in length and approximately two acres in area. Valley Oak Backpack Camp would include five individual sites a minimum of 100 feet from each other, with at least 200 feet between the farthest two sites.

Campsites at Valley Oak Backpack Camp would feature a flat area of compacted earth (230 square feet), a metal food locker (15 cubic feet), and an embedded pad for camp stove cooking. Each site is designed to accommodate up to four people. A toilet facility would not be provided at this location.

Access Roads and Trails

The Amendment area is currently accessible via existing ranch roads, which form the backbone for the proposed trail network. Several ranch roads would be repurposed as trails for public use while other roads would be converted to operations and maintenance access roads or decommissioned. Nearly two miles of new trail would be constructed, three miles of existing ranch roads would be repurposed as multi-use trails, over one mile would be repurposed as an operations and maintenance access-only road, and two miles of ranch road would be decommissioned. All trails within the Amendment area would comply with the County's Uniform Interjurisdictional Trail Design, Use, and Management Guidelines Manual. Trail design will also follow the California State Parks Trails Handbook for construction guidelines, siting, and other principles of trail building. Exhibit 3 illustrates the location of new trails as well as existing trails and ranch roads that are to be repurposed as multi-use trails or decommissioned.

Most existing trails are sufficient to support immediate implementation of the backpack camps. Existing ranch roads being repurposed for trail use would be narrowed to a five-foot tread width,

appropriate to accommodate various permitted trail uses as well as a standard four-wheel drive off-road utility vehicle or small tractor for patrol and maintenance. Existing ranch roads that are recommended for decommissioning would be restored and reseeded with a native plant mix appropriate to the area. Passive restoration through germination of existing seed bank and mulching with native debris would also be implemented.

Both new trail construction and repurposing of existing trail would use a mechanical trail dozer and manual tools for brush-clearing and finishing work. Trails would be constructed by County Parks trail crews.

Sections of existing ranch roads are too steep to serve as multi-use trails; therefore, County Parks would construct three segments of new multi-use trail and one bridge to improve the trail network within the Amendment area. The new trails added to the Park network would be the Sulphur Springs Ranch Trail and Isabel Ridge Trail. The Smith Creek Trail and Manzanita Trail are currently open for public use but would be extended as part of the Amendment improvements. Each multi-use trail would be five feet in tread width and comply with the County's Uniform Interjurisdictional Trail Design, Use, and Management Guidelines Manual. Trail design will also follow the California State Parks Trails Handbook for construction guidelines, siting, and other principles of trail building. Following is a description of locations and improvements for each trail.

Sulphur Springs Ranch Trail

The new Sulphur Springs Ranch Trail would connect the Smith Creek Trail to the Sulphur Springs Ranch Backpack Camp. This new trail would be developed from a segment of repurposed ranch road and two segments of newly constructed trail and would be approximately 0.5 mile in length.

Smith Creek Trail

The Smith Creek Trail is an existing Park trail that would be extended into the Amendment area to connect to the Valley Oak Backpack Camp. This trail extension would be developed from a segment of new trail that connects to a new bridge over Sulphur Creek and a segment of repurposed ranch road. The trail extension alignment would follow Smith Creek on the northeast bank for a section and then climb the slope, terminating at Valley Oak Backpack Camp. The segment of new trail and the extension combined would be approximately 0.5 mile.

Isabel Ridge Trail

The new Isabel Ridge Trail begins at a junction with Smith Creek Trail and climbs Isabel Ridge, offering visitors sweeping views of the Western Diablo Range. Isabel Ridge Trail would be developed from a repurposed ranch road and would be nearly two miles in length.

Manzanita Trail

The Manzanita Trail is an existing Park trail that would be extended into the Amendment area to connect to Smith Creek Trail. A segment of the Manzanita Trail would be decommissioned from public use and converted to an access road. From the junction with the access road, the alignment of Manzanita Trail would be extended in a southeasterly direction toward the Amendment area's southern boundary, at which point it would cross Smith Creek. The trail would cross the creek as a

wet crossing, meaning there would not be a bridge. From Smith Creek, the trail would continue northwesterly until it connected at a junction with Smith Creek Trail. The Manzanita Trail extension would be over one mile in length of new trail construction.

In addition to these multi-use trail improvements, new trails would be constructed to provide internal trail connection between campsites within each backpack camp. The total length of new internal trail connections at the Sulphur Springs Ranch Backpack Camp would be approximately 3,200 feet, while approximately 200 feet would be added at the Valley Oak Backpack Camp. These new internal trails would be five feet in tread width to comply with the County's Uniform Interjurisdictional Trail Design, Use, and Management Guidelines Manual and the California State Parks Trails Handbook.

Table 1: Trail Improvement Mileage

Trail	New	Repurposed	Total
Sulphur Springs Ranch	0.45 mile	0.14 mile	0.60 mile
Smith Creek extension	0.11 mile	0.68 mile	0.80 mile
Isabel Ridge	--	1.95 miles	1.95 miles
Manzanita extension	1.29 miles	--	1.29 miles
Internal – Sulphur Springs Ranch Backpack Camp	0.61 mile	--	0.53 mile
Internal – Valley Oak Backpack Camp	0.04 mile	--	0.04 mile
Total	~2 miles	~3 miles	~5 miles
Source: Santa Clara County Parks. 2020. Draft Joseph D. Grant County Park Master Plan Amendment.			

1.4.2 - Operational Characteristics

The Sulphur Springs Ranch and Valley Oak backpack camps would be open for reservations and use year-round but may close occasionally pursuant to standard County Parks policy due to instances such as inclement weather or other unsafe conditions. Campers would be required to reserve a campsite in advance through County Parks' reservation system. No potable water would be provided in the backcountry or at the camps; food would be required to be stored in the provided storage lockers at each campsite; hikers would be required to pack out trash waste items; campfires would be prohibited. No trash receptacles or picnic tables would be provided at the backpack camps.

Upon arrival to the Park, campers should check-in with a ranger to register their vehicle to park at the Stockman's Group Picnic Area overnight and review Park, trail, and backcountry rules. Campers arriving after the Park is closed will follow the existing Park protocols for after-hours arrival. Operations and maintenance staff would access the Amendment area via existing Park trails and improved ranch roads.

Park staff would utilize all-terrain vehicles (ATVs) and utility task vehicles (UTVs) for maintenance, patrol, and emergency access to trails and camps. Periodic or seasonal mowing of trails as well as

mowing or weed whipping in the camps would be required to improve wayfinding and define camping areas.

1.5 - Best Management Practices Incorporated into the Project

Best Management Practices (BMPs) are incorporated into the Master Plan Amendment design to ensure that project-related effects are minimized or avoided. Successful implementation of BMPs would ensure minimization of air quality, biological, noise, and cultural resource impacts. These include County Parks' BMPs for prevention of plant pathogen introductions on County Park Lands, construction site BMPs during construction activities to reduce pollutants in storm water discharges, County standards for noise reduction per the County Noise Ordinance Code Chapter 8, during construction, Bay Area Air Quality Management District (BAAQMD) Basic Construction BMPs, and Stormwater Pollution Prevention Plan (SWPPP) BMPs.

1.6 - Construction Schedule

Implementation of proposed improvements is envisioned over a 10-year period between 2020 and 2029. Construction would take place in four phases as follows:

Phase One: Installation of the Sulphur Springs Ranch Backpack Camp (group site, individual sites, and connector trails), backcountry toilet, access road with truck turnaround, and Sulphur Springs Ranch Trail.

Phase Two: Installation of the access road from Sulphur Springs Ranch Trail to Sulphur Creek, Sulphur Creek Bridge, Smith Creek Trail from current terminus to new bridge, Smith Creek Trail from the bridge to Isabel Ridge Trail, and Isabel Ridge Trail.

Phase Three: Installation of the Manzanita Trail extension to the junction with Isabel Ridge Trail and decommission of the southern Manzanita Trail segment and conversion to access road.

Phase Four: Installation of the Valley Oak Backpack Camp and the extension of Smith Creek Trail from the junction of the Manzanita Trail to the Valley Oak Backpack Camp by repurposing the ranch road.

Phases Two, Three, and Four cannot supersede Phase One as trail network construction would extend with each phase and Phase One provides proper vehicular access to facilitate construction and maintenance for the following phases. In the case that Phase Four must be built independently, Phases Two and Three may be constructed concurrently following Phase One to alleviate total costs.

1.7 - Required Discretionary Approvals

The proposed project may require approvals, actions, and permits from various public agencies. In accordance with CEQA, the information contained in this Initial Study will be utilized, as applicable, by these agencies in conjunction with their respective roles for the project.

- County of Santa Clara, Department of Environmental Health

- California Department of Fish and Wildlife (CDFW)
- San Francisco Bay Regional Water Quality Control Board
- Bay Area Air Quality Management District
- U.S. Army Corps of Engineers (USACE)
- U.S. Department of Fish and Wildlife
- Santa Clara Valley Habitat Agency

1.8 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the Master Plan Amendment. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the Master Plan Amendment. The Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

Kimberly Brosseau
County of Santa Clara
Parks and Recreation Department
298 Garden Hill Drive
Phone: 408.355.2230
Email: Kimberly.brosseau@prk.sccgov.org

Submittal of written comments via e-mail is encouraged as it greatly facilitates the response process.

In response to the COVID-19 and Shelter-in-Place policy, hard copies are no longer available at the typical locations such as the County of Santa Clara Parks and Recreation Department, located at 298 Garden Hill Drive in Los Gatos; and at Joseph D. Grant County Park during normal business hours. Therefore, if requested, a hard copy will be mailed to you. Please allow time for printing and delivery.

The Draft IS/MND is available for review at the County of Santa Clara Parks and Recreation Department's website at: www.parkhere.org/JDGrantMPAmendment



Source: Census 2000 Data, The CaSIL

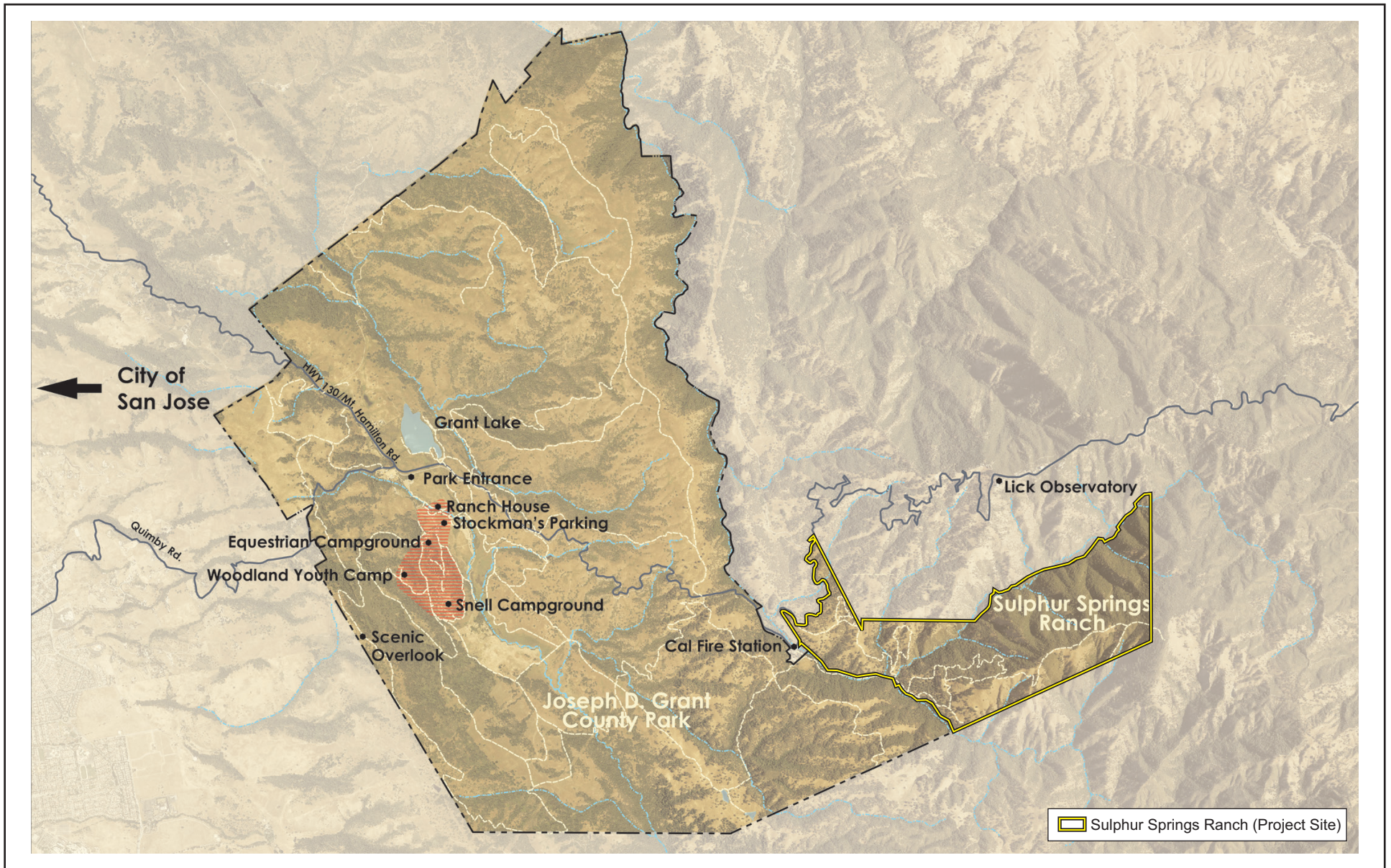
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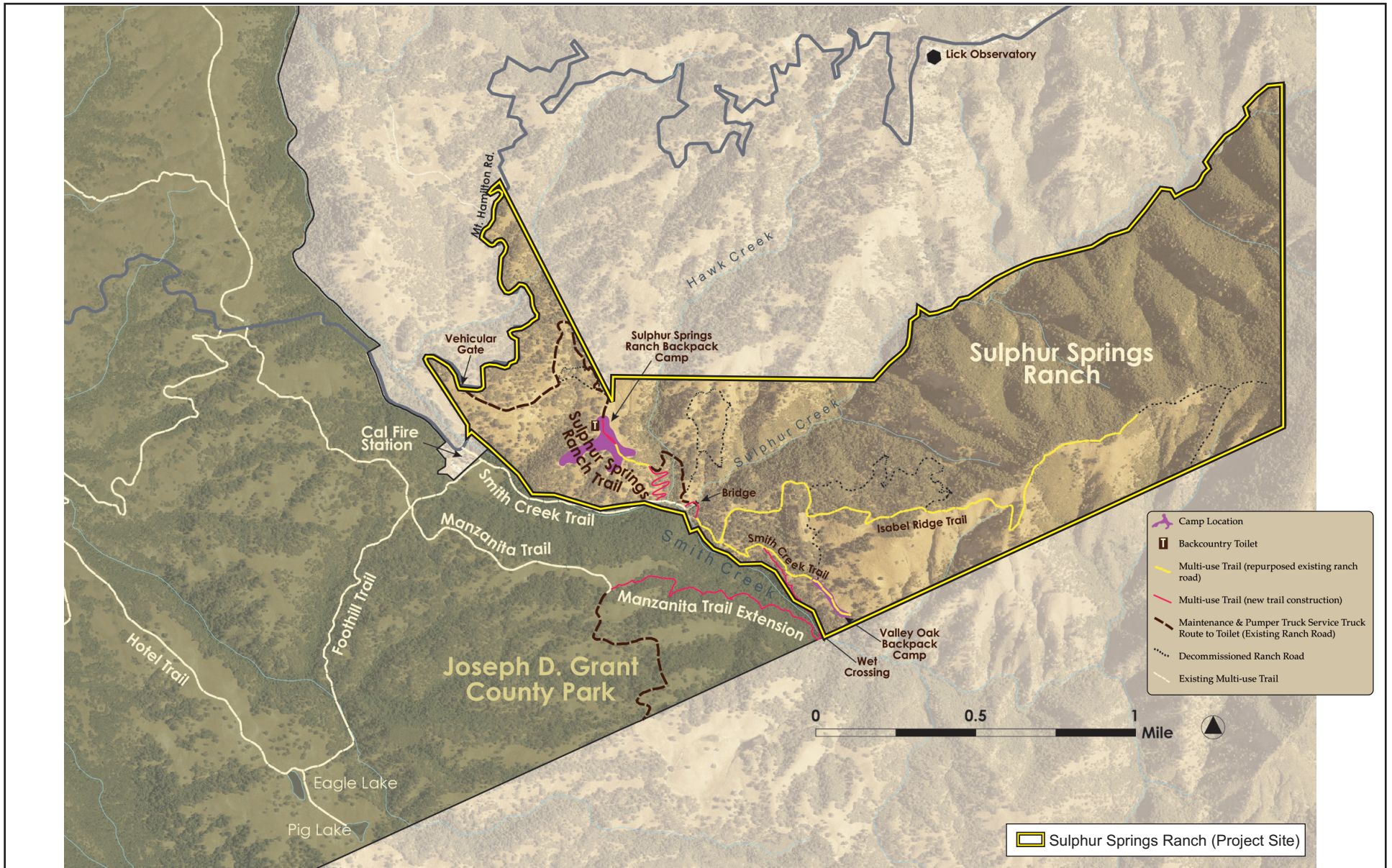
Exhibit 1 Regional Location Map

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Source: RRM Design Group, April 1, 2020.

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Source: RRM Design Group, April 1, 2020.

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Exhibit 3 Proposed Amendment Improvements

RRM DESIGN GROUP • JOSEPH D. GRANT PARK MASTER PLAN AMENDMENT
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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INITIAL STUDY

Environmental Evaluation Checklist for Santa Clara County

Project Title: Joseph D. Grant County Park Master Plan Amendment **Date:** September 4, 2020

File Number: N/A **APNs:** 627-06-002, 627-07-013, 627-07-014

500" Map #: N/A **General Plan Designation:** Ranchland

Zoning: Agricultural Ranchlands and Agricultural Ranchlands-Scenic Roads

Project Type: Master Plan Amendment **USA (if any):** N/A

Lead Agency Name and Address: County of Santa Clara
298 Garden Hill Drive, Los Gatos, CA 95032-7669

Applicant Name and Address: County of Santa Clara, Parks and Recreation Department
298 Garden Hill Drive, Los Gatos, CA 95032-7669

Owner Name and Address: Same as Above

Telephone: 408-355-2200

SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

The environmental factors checked below would be potentially affected by this project, involving at least one impact as indicated by the checklist on the following pages.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural/Historical/Archaeological Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input checked="" type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Services Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

A. Aesthetics						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	<u>Less Than Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Potentially Significant Impact</u>	<u>Cumulative</u>	
1. If subject to Architecture and Site Approval, be generally in non-compliance with the Guidelines for Architecture and Site Approval?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	35, 36
2. Create an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 37
3. Substantially damage scenic resources, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4, 7, 10f
4. Obstruct scenic views from existing residential areas, public lands, public water body or roads?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3
5. Be located on or near a ridgeline visible from the valley floor?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 10f, 11c,
6. Adversely affect the architectural appearance of an established neighborhood?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3
7. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3

Discussion

The Master Plan Amendment would provide for public use and access of the former Sulphur Springs Ranch by creating two new backpack camps: Sulphur Springs Ranch Backpack Camp and Valley Oak Backpack Camp. The Master Plan Amendment would also include construction of required infrastructure to support the proposed camping uses and trail access, including trails connecting Sulphur Springs Ranch to the existing trail system of Joseph D. Grant County Park. Therefore, the proposed Master Plan Amendment project includes both the uses in the former Sulphur Springs Ranch and within the existing boundaries of Joseph D. Grant Park. The location of the camps, access roads, trails, and trail crossings are depicted in Exhibit 3. One of the trails, the extension of the Manzanita Trail, is located outside the former Sulphur Springs Ranch, but within the existing park boundaries. Development would include installation of a backcountry toilet at the Sulphur Springs Ranch Backpack Camp and improvements to the ranch road leading from Mount Hamilton Road to Sulphur Springs Ranch Backpack Camp. This access road would allow for passage of a pumper truck to service the toilet.

Impact Analysis

1. Projects subject to Architectural and Site Approval (ASA) include commercial, institutional, office, industrial, and multi-family residential uses. The Master Plan Amendment proposes a

plan for public access and related trail improvements and backpack camps and is not subject to ASA Guidelines. **No impact.**

2. The Master Plan Amendment would not likely create an aesthetically offensive site open to public view. The Amendment area has historically been used for cattle grazing, and much of the proposed trail network would involve the use of existing ranch roads. Little or no change to the open space areas would be visible from vantage points within the park or from public views.

Less-than-significant impact.

3. The Santa Clara County General Plan (General Plan) designates a scenic resource according to its ecological, functional, economic, or aesthetic and/or recreational value.² The County has established goals and policies related to scenic resources and roadways to protect visual quality along such corridors.

There are no State-designated scenic highways in the vicinity of the Park.³ Therefore, the implementation of the Master Plan Amendment would not cause substantial damage to scenic resources within a State scenic highway. Mount Hamilton Road is a County-designated scenic route and borders a small portion of the northwest Amendment area.⁴ However, the Master Plan Amendment would not conflict with any General Plan policies regarding protection of County scenic routes, and further would assist in implementing the General Plan's policies by developing complementary recreation facilities and leaving viewsheds from the road intact.⁵ **No impact.**

4. The General Plan does not designate specific scenic vistas or views other than those generally associated with scenic roadways and highways (see Impact 3 above). The implementation of the Master Plan Amendment would not conflict with any General Plan policies regarding protection of County scenic routes and would assist in implementing the General Plan's policies by developing complimentary recreation facilities and leaving viewsheds from Mount Hamilton Road intact.⁶

The Amendment area is mostly open grassland and oak woodland in the Western Diablo Range foothills east of San José. The implementation of the Master Plan Amendment would not include construction of any elements that would obstruct views from other areas of the Park or Amendment area. There are no residential areas within the Amendment area or its vicinity. Grant Lake is located in the Park. Therefore, there would be no impacts to scenic views. **No impact.**

5. Neither of the proposed backpack camps would be located on a ridgeline. **No impact.**
6. There are no residential areas within the Amendment area or its vicinity; therefore, the implementation of the Master Plan Amendment would not adversely affect the architectural appearance of an established neighborhood. **No impact.**

² County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

³ California Department of Transportation (Caltrans). 2019. List of eligible and officially designated State Scenic Highways. August.

⁴ County of Santa Clara, Planning Office. 2008. Regional Parks and Scenic Highways Map Element of the Santa Clara County General Plan. June 26.

⁵ County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

⁶ Ibid.

7. The Master Plan Amendment does not propose any new sources of light. The Amendment area is in a rural area where there no existing sources of light. The only nearby sources of light and glare would be vehicles on the existing Mount Hamilton Road, which borders the Amendment area for a short length. There would be an additional 3-4 vehicles daily on Mount Hamilton Road which would be an insignificant amount of additional light generated.

Depending on the building material used for the roof of the backcountry toilet and whether the unit would have any windows, the toilet building could create minimal glare. However, any glare would be extremely minor in proportion to the Amendment area and would not adversely affect any day or nighttime views in the area. Therefore, the implementation of the Master Plan Amendment would not create a new source of substantial light or glare. **No impact.**

Mitigation: None required.

B. Agriculture and Forest Resources						
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p>						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,20, 21, 23,24,26
2. Conflict with existing zoning for agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9,21
3. Conflict with an existing Williamson Act Contract or the County's Williamson Act Ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 49
4. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,4,26
5. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by Public Resources Code section 4526) or timberland zoned Timberland Production (as definite by Government Code section 51104(g)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 33
6. Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	33

Discussion

The General Plan designates the Amendment area as Ranchland.⁷ The Farmland Mapping and Monitoring Program (FMMP) designates portions of the Amendment area as Grazing Land, but the majority is designated as Other Land.⁸ Grazing Land is land with existing vegetation suited for livestock grazing. Other Land can include low density rural developments, timber, wetland, and riparian areas not

⁷ County of Santa Clara Planning Office. 2016. Land Use Plan Map. October.

⁸ California Department of Conservation, Division of Land Resources Protection. 2018. Santa Clara County Important Farmland 2016. September.

suitable for livestock grazing, strip mines, and water bodies less than forty acres. County Parks acquired the Amendment area in 2012 as an expansion of the Park and is now considered part of a regional park.

The Santa Clara County Zoning Ordinance has zoned the Amendment area parcels as Agricultural Ranchlands (AR) and Agricultural Ranchlands combined with Scenic Roads (AR-sr). These districts are meant to protect ranching, natural resources, and rural character, and in the case of AR-sr, are meant to preserve the visual character of scenic roads (in this case, Mount Hamilton Road).

Impact Analysis

1. There are no Prime Farmlands, Unique Farmlands, Farmlands of Statewide importance, or Forest or Timberland Production lands on or near the Amendment area, as indicated in the 2016 Santa Clara County FMMP. Grazing is an integral component of the vegetation management program within the Park and the Amendment area. The Amendment would not convert farmland to non-agricultural use. **No impact.**
2. Low-intensity recreation and preserving land in its “natural state” are permitted uses in the AR district.⁹ Therefore, the Master Plan Amendment would not conflict with existing zoning. **No impact.**
3. Assessor’s Parcel Number 627-06-002 in the southwest corner of the Amendment area is currently under a Williamson Act contract. Notification of non-renewal has been filed and the contract terminates on January 1, 2029. While the contract is under non-renewal, development of the parcel for recreational uses may occur per the County Ordinance Code Section C13-15 (compatible use).¹⁰ The Amendment area would remain under the existing grazing license to manage natural resources and reduce fuel loads. Therefore, impacts would be less than significant. **Less than significant impact.**
4. The Amendment area is surrounded by ranchland and public open land uses with little infrastructure. The Master Plan Amendment does not possess any characteristics that would lead to conversion of Farmland or forest land. **No impact.**
5. The Master Plan Amendment would not impact forest resources since the Amendment area does not contain any forest land as defined in Public Resources Code Section 12220(g), timberland as defined by Public Resources Code Section 4526, or property zoned for Timberland Production as defined by Government Code Section 51104(g). **No impact.**
6. The Amendment area contains existing trails and undeveloped land. Most of the trees at the proposed backpack camps and along new trails would remain. The proposed camp locations are not considered suitable forest land. This condition precludes the possibility of the loss of forestland. **No impact.**

Mitigation: None required.

⁹ County of Santa Clara. 2018. Santa Clara County Zoning Ordinance. May.

¹⁰ County of Santa Clara Planning Office. Online Property Profile. Website: www.sccplanning.org/gisprofile/profile_web.html?apn=62706002. Accessed January 22, 2020.

C. Air Quality						
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5,34
2. Violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2,3,4
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5,29
4. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4, 28
5. Create objectionable dust or odors affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 34
6. Alter air movement, moisture, or temperature, or cause any change in climate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 4, 5

Discussion

Sources of air pollution in the San Francisco Bay Area are regulated by the Bay Area Air Quality Management District. BAAQMD's Bay Area 2017 Clean Air Plan provides a strategy to reduce air pollutants and establishes emission control practices to be adopted or implemented in the 2017-2020 timeframe.

Major criteria pollutants, listed in "criteria" documents by the U.S. Environmental Protection Agency and the California Air Resources Board, may contribute to negative health effects, such as respiratory impairment and symptoms of heart/lung disease. The San Francisco Bay Area does not meet State or Federal ambient air quality standards for ground level ozone and fine particulate matter (PM_{2.5}) and State standards for coarse particulate matter (PM₁₀). The area is considered in attainment or unclassified for all other pollutants.

Besides criteria air pollutants, there is another group of substances found in ambient air referred to as toxic air contaminants (TACs). TACs tend to be localized and are found in relatively low concentrations in ambient air. Exposure to low concentrations over long periods, however, can result in adverse chronic health effects. Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the San Francisco Bay Area average).

The Master Plan Amendment would generate emissions during construction from dust and operation of construction equipment. Construction would occur over a period of approximately nine years, in four phases.

Impact Analysis

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

1. If a project's construction or operational emissions exceed BAAQMD significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

The Master Plan Amendment is in Santa Clara County, where air quality is regulated by BAAQMD. The San Francisco Bay Area region is currently designated non-attainment for state and federal ozone and PM_{2.5} standards, and the state PM₁₀ standard. The region is in attainment or unclassified for all other ambient air quality standards.¹¹ BAAQMD prepares Air Quality Plans (AQPs) that include projected emissions inventories and account for emission reduction strategies to demonstrate how the region will achieve ambient air quality standards by given deadlines. BAAQMD recommends that projects consider three criteria to determine if a project would conflict with or obstruct implementation of an applicable AQP:¹²

- **Does the project support the primary goals of the AQP?**

The 2017 Clean Air Plan serves as the AQP for attaining federal ambient air quality standards. Its primary goals are to protect public health and the climate. As discussed in Air Quality Impact 2, the Master Plan Amendment construction- and operation-related emissions would not exceed BAAQMD's thresholds of significance on an average daily or annual basis. Therefore, the Master Plan Amendment would not result in a significant impact and would be consistent with goals of the applicable AQP.

- **Does the project include applicable control measures from the AQP?**

Regardless of significance, all projects within BAAQMD's jurisdiction are required to implement BAAQMD Basic Construction BMPs. County Parks would implement all Basic Construction BMPs, which would be consistent with assumptions in the AQP. Furthermore, the Master Plan Amendment would comply with all applicable BAAQMD rules and regulations.

- **Does the project disrupt or hinder implementation of AQP control measures?**

The Master Plan Amendment would comply with all required control measures, rules, and regulations required by BAAQMD during construction and operation. The Master Plan Amendment would not include any special features that would disrupt or hinder implementation of the AQP control measures. Therefore, the Master Plan Amendment would not conflict with or obstruct implementation of the applicable AQP. **Less than significant impact.**

¹¹ Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January 5. Website: <https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>. Accessed February 25, 2020.

¹² Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May.

2. Construction emissions would result from on-site and off-site activities. On-site emissions would principally consist of exhaust emissions from heavy-duty off-road construction equipment and fugitive dust (mainly PM₁₀) from disturbed soil. Off-site emissions are caused by motor vehicle exhaust from delivery and haul truck vehicles, worker traffic, and road dust. Most fugitive dust would remain localized and be deposited near the Amendment area. However, potential for impacts from fugitive dust exists unless BMP's are implemented to reduce emissions.

Due to the limited nature of construction required for implementation of the Master Plan Amendment, use of heavy construction equipment or heavy-duty hauling trucks for extended periods of time would not be required. Construction activities associated with implementation of the Master Plan Amendment would be limited to repurposing ranch roads and installation of the backcountry toilet. A SWECO 480 trail dozer and hand tools would be used to grade trails and make improvements. SWECO trail dozers are Tier III, 83 horsepower construction vehicles. The Master Plan Amendment is anticipated to be completed over an approximate nine-year period from 2020 to 2029 in four phases. Access road grading and surfacing would take place in the first two phases.

For all proposed projects, BAAQMD recommends implementation of all Basic Construction BMPs listed below regardless of whether construction-related emissions exceed applicable thresholds of significance. Application would minimize fugitive PM dust generated during construction.

- a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- d) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- h) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

With implementation of BAAQMD's Basic Construction BMPs applicable to the project, construction-related emissions associated with implementation of the Master Plan Amendment would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. **Less than significant impact.**

Pollutants of concern include reactive organic gasses, oxides of nitrogen, PM₁₀, and PM_{2.5}. Operational emissions would be generated by area, energy, and mobile sources. Area sources are generally individual facilities releasing pollutants. No area sources are in the vicinity of the Amendment area. Energy sources are not considered here since no electricity or natural gas connections are proposed as part of the Master Plan Amendment. Mobile sources would include vehicle trips associated with visitors, employees, and delivery trucks. The County estimates a maximum of approximately 1,000 additional campers annually to the Amendment area. Conservatively assuming each camper brings their own vehicle and campers are distributed throughout the year, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily, or 25 vehicles per week on average. Additional truck trips resulting from increased visitation and construction would include pumper trucks, delivery trucks, garbage trucks, maintenance vehicles, and fire protection vehicles, as necessary. If these trips occurred on a weekly basis, they would average four truck trips per week. This increase is not substantial in relation to existing traffic load and capacity and emissions would likely be below applicable thresholds. Therefore, the operation-related emissions would result in a less than significant impact. **Less than significant impact.**

3. Construction activities associated with the Master Plan Amendment are not expected to significantly impact air quality, as fossil fueled equipment use and construction activities themselves are highly limited. Based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily, or 25 visitor vehicles per week. Approximately four weekly truck trips are expected. This increase is not substantial in relation to existing traffic load and capacity and emissions would likely be below applicable thresholds.

As discussed in Impact 2, construction- and operation-related emissions would be less than significant with implementation of BAAQMD's Basic Construction BMPs. The San Francisco Bay Area region is in non-attainment for federal and state ozone standards, state PM₁₀ standards, and federal and state PM_{2.5} standards.¹³ Therefore, an individual project with less than significant emissions impacts would not be considered to result in a cumulatively considerable contribution to regional air quality impacts. Construction- and operation-related emissions associated with the Master Plan Amendment would not create a cumulatively considerable contribution to existing regional air quality impacts. **Less than significant impact.**

4. The Amendment area is in an undeveloped, unincorporated hillside area of the County. The closest sensitive receptors are residential areas over five miles west and southwest of the Amendment area in the City of San José.

¹³ Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January 5. Website: <https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>. Accessed February 25, 2020.

Exposure to TAC emissions can have both chronic long-term (over a year or longer) and acute short-term (over a period of hours) health impacts. Construction-period TAC emissions could contribute to increased health risks to nearby residents or sensitive receptors.

The Master Plan Amendment's short-term construction would be minor and not involve emission-intensive activities such as earthmoving or mass site grading. It is anticipated that implementation of the Master Plan Amendment would take place over the course of nine years, with completion estimated in 2029. Given the low intensity and short-term nature of proposed construction activities, and that sensitive receptors are far from the Amendment area, it is not anticipated that Master Plan Amendment construction-related TAC emissions would expose sensitive receptors to substantial pollutant concentrations. Therefore, construction activities associated with the Master Plan Amendment would not result in a significant health risk impact on sensitive receptors. **Less than significant impact.**

Carbon monoxide (CO) emissions from traffic are a concern at the local level. Congested intersections can result in high, localized concentrations of CO. The BAAQMD criteria identify when site-specific CO dispersion modeling is necessary. The Master Plan Amendment would result in a less than significant impact to air quality for local CO if the following are met:

- a) The Master Plan Amendment is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
- b) The Master Plan Amendment's traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- c) The Master Plan Amendment's traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Traffic Volumes for 2017 conducted by the California Department of Transportation (Caltrans) indicate that the Average Annual Daily Traffic (AADT) on Mount Hamilton Road was 400 vehicles at each of the intersections with Quimby Road and Kincaid Road, which are the traffic count locations nearest the Park entrance and the Amendment area, respectively.¹⁴

Based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily. Approximately four weekly truck trips are expected. This increase is substantially less than the BAAQMD screening thresholds considering Mount Hamilton Road does not receive enough traffic in an entire day to trigger hourly thresholds. Therefore, the proposed Master Plan Amendment's contribution to cumulative future traffic volumes would not exceed the CO screening criteria and would not have a significant impact on sensitive receptors. **Less than significant impact.**

¹⁴ California Department of Transportation (Caltrans). 2017. 2017 Traffic Volumes: Route 118-133. Website: <https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-118-133>. Accessed February 25, 2020.

5. As stated in the BAAQMD 2017 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard.¹⁵ The ability to detect odors varies considerably. Two circumstances have the potential to cause odor impacts:
 - a) A source of odors is proposed to be located near existing or planned sensitive receptors, or
 - b) A sensitive receptor land use is proposed near an existing or planned source of odor.

Diesel exhaust and volatile organic compounds would be emitted during construction associated with the Master Plan Amendment, which could result in objectionable odors to some populations. However, emissions would disperse rapidly from the sites and construction activities would be relatively low in intensity and short-term. Therefore, it is not anticipated that construction-related activities would create objectionable odors affecting a substantial number of people.

Land uses typically associated with odors include wastewater treatment and disposal and agriculture. The Amendment proposes installing a backcountry toilet at one of the camps, which could periodically emit objectionable odors. However, the toilet building would feature a powerless ventilation system to force gas and odors out of the building. Orienting the wall vent into prevailing winds would drive the ventilation system. Aside from the backcountry toilet, the Master Plan Amendment does not involve land uses typically associated with emission of objectionable odors. During operation, minimal odors could also be emitted from vehicles traveling to the Amendment area. Based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily, a minimal amount that would not be considered to contribute discernable amount of emissions. Based on the above information, the operation phase of the implementation of the Master Plan Amendment would not produce objectionable odors affecting a substantial number of people; therefore, impacts related to the project's generation of odor during day-to-day operations would be less than significant.

Although the Master Plan Amendment would not be a typical source of objectionable odors, the Amendment area would be a place of congregation and so have potential to place sensitive receptors near sources of odors (the backcountry toilet). However, the Amendment area is not located near agricultural operations (dairies, feedlots, etc.), landfills, wastewater treatment plants, refineries, or other types of industrial land uses. Thus, the Master Plan Amendment would not place sensitive receptors near sources of objectionable odor affecting a substantial number of people and impacts would be less than significant. **Less than significant impact.**

6. The Plan would not alter air movement, moisture, or temperature, or cause any change in climate. **No impact.**

Mitigation: None required.

¹⁵ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May.

D. Biological Resources						
WOULD THE PLAN:	IMPACT					SOURCE
	NO	YES				
		No Impact	Less Than Significant Impact	Less Than Significant With Mitigation Incorporated	Potentially Significant Impact	
1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 7, 1, 11d
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,7, 10b
3. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or tributary to an already impaired water body, as defined by section 303(d) of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 7
4. Have a substantial adverse effect on oak woodland habitat as defined by Oak Woodlands Conservation Law (conversion/loss of oak woodlands)—Public Resource Code 21083.4?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3,5
5. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,7,
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,4,52
7. Impact a local natural community, such as a freshwater marsh, oak forest or saltwater tide land?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 10b, 11d
8. Impact a watercourse, aquatic, wetland, or riparian area or habitat?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 12b, 39
9. Adversely impact unique or heritage trees or a large number of trees over 12" in diameter?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 25
10. Conflict with any local policies or ordinances protecting biological resources:						
i) Tree Preservation Ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 49
ii) Wetland Habitat?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 5, 10b, 52
iii) Riparian Habitat?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 5, 10b,

FCS completed a Biological Constraints Analysis Technical Memorandum for the proposed Master Plan Amendment in November 2018 for project features located in the Sulfur Springs Ranch area (Appendix A), and a follow-up reconnaissance-level field survey for all proposed project features on May 19, 2020.

Existing Conditions

The Amendment area is located within the Western Diablo Range and consists predominately of oak woodland, annual grassland, chaparral, and mixed riparian vegetation. Oak woodlands include canyon live oak (*Quercus chrysolepis*), blue oak (*Quercus douglasii*), interior live oak (*Quercus wislizeni*), black oak (*Quercus kelloggii*), valley oak (*Quercus lobata*), and scrub oak (*Quercus berberidifolia*). Other woody species present include California bay (*Umbellularia californica*), manzanitas (*Arctostaphylos* spp.), grey pine (*Pinus sabiniana*), chamise (*Adenostoma fasciculatum*), and others. Herbaceous vegetation observed on-site includes predominantly non-native annual grassland interspersed with native grasses and forbs, including blue wildrye (*Elymus glaucus*), tarweed (*Holocarpha virgata*), and others.

The diversity of plant species in the Amendment area affords a diversity of wildlife, including notable species such as California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), and a variety of residential and migratory bird species.¹⁶

Additionally, the Amendment area includes two perennial creeks, Smith Creek and Sulphur Springs Creek, several ephemeral and intermittent headwater drainages, associated riparian vegetation, and a spring-fed seasonal wetland.

Impact Analysis

Special-Status Plants

1. A plant species' potential to occur in the Amendment area was evaluated based on presence of suitable habitats, soil types, occurrences recorded by the California Native Plant Society (CNPS) and in the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDB), previous biological documents, and observations made during site surveys. Similarly, potential habitat suitability was determined for special-status plant species known to occur in the region. Search results from the CNDDB and the CNPS' Inventory of Rare and Endangered Plants indicate that 11 special-status plant species have been documented to occur on or in the greater vicinity of the Amendment area (see Appendix A). Additionally, Nomad Ecology developed a list of 20 potentially occurring or observed special-status plant species for the Amendment area.¹⁷ The table values are directly from Nomad's study. These species have potential to occur within the Amendment area based on habitats observed during field surveys. Special-status plant species evaluated as having potential to occur in the Amendment area are included in Table 2, which includes habitat specifications.

¹⁶ Nomad Ecology. 2012. Easement Documentation Report: Nolan Property. September.

¹⁷ Ibid.

Table 2: Special-status Plant Species Previously Documented within the Amendment Area

Common Name`	Scientific Name	Federal Listing	State Listing	State Rare Plant Rank	Habitat in which the species is found	Potential to Occur
Santa Clara thorn-mint	<i>Acanthomintha lanceolata</i>	—	—	4.2	Chaparral (often serpentinite), cismontane woodland, coastal scrub	Presence documented
Bent-flowered fiddleneck	<i>Amsinckia lunaris</i>	—	—	1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub	Possible
California androsace	<i>Androsace elongate acuta</i>	—	—	4.2	Chaparral, cismontane woodland, coastal scrub, meadows and seeps, pinyon and juniper woodland, valley and foothill grassland	Possible
Oakland star-tulip	<i>Calochortus umbellatus</i>	—	—	4.2	Often serpentinite, broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland	Possible
Santa Cruz Mountains pussypaws	<i>Calyptridum parryi</i> var. <i>hesseae</i>	—	—	1B.1	Chaparral, cismontane woodland on sandy or gravelly outcroppings	Possible

Common Name`	Scientific Name	Federal Listing	State Listing	State Rare Plant Rank	Habitat in which the species is found	Potential to Occur
Chaparral harebell	<i>Campanula exigua</i>	—	—	1B.2	Chaparral on rocky sites, usually on serpentine soils	Possible
Mt. Hamilton thistle	<i>Cirsium fontinale</i> var. <i>campylon</i>	—	—	1B.2	Cismontane woodland, chaparral, valley and foothill grasslands within seasonal and perennial drainages on serpentine	Not expected. No serpentine observed in project footprint.
Brewer's clarkia	<i>Clarkia breweri</i>	—	—	4.2	Often serpentinite, chaparral, cismontane woodland, coastal scrub	Possible
Santa Clara red ribbons	<i>Clarkia concinna</i> ssp. <i>Automixa</i>	—	—	4.3	Cismontane woodland, chaparral on slopes and near drainage	Possible
Hospital Canyon larkspur	<i>Delphinium californicum interius</i>			1B.2	Openings in chaparral, mesic cismontane woodland, coastal scrub	Possible
Santa Clara Valley dudleya	<i>Dudleya abramsii</i> ssp. <i>Setchellii</i>	FE	—	1B.1	Valley and foothill grasslands, cismontane woodland on rocky serpentine outcrops	Not expected. No serpentine observed in project footprint.
Tracy's eriastrum	<i>Eriastrum tracyi</i>	—	CR	3.2	Chaparral, cismontane woodland, valley and foothill grassland	Possible

Common Name`	Scientific Name	Federal Listing	State Listing	State Rare Plant Rank	Habitat in which the species is found	Potential to Occur
Coast iris	<i>Iris longipetala</i>	—	—	4.2	Mesic, coastal prairie, lower montane coniferous forest, meadows and seeps	Possible
Mt. Hamilton coreopsis	<i>Leptosyne hamiltonii</i>	—	—	1B.2	Cismontane woodland on steep shale talus with open southwestern exposure	Possible
Mt. Hamilton lomatium	<i>Lomatium observatorium</i>	—	—	1B.2	Cismontane woodland within open to partially shaded openings in pine and oak woodlands	Possible
Showy golden madia	<i>Madia radiata</i>	—	—	1B.1	Cismontane woodland, valley and foothill grassland	Possible
Hall's bush mallow	<i>Malacothamnus hallii</i>	—	—	1B.2	Chaparral, coastal scrub	Possible
Oregon meconella	<i>Meconella oregana</i>	—	—	1B.1	Coastal prairie, coastal scrub	Possible
San Benito pentachaeta	<i>Pentachaeta exilis aeolica</i>	—	—	1B.2	Cismontane woodland, valley and foothill grassland	Possible
Mt. Diablo phacelia	<i>Phacelia phacelioides</i>	—	—	1B.2	Chaparral, cismontane woodland. Adjacent to trails, on rock outcrops and talus slopes	Possible

Common Name`	Scientific Name	Federal Listing	State Listing	State Rare Plant Rank	Habitat in which the species is found	Potential to Occur
Rock sanicle	<i>Sanicula saxatilis</i>	—	CR	1B.2	Broadleafed upland forest, chaparral, valley and foothill grassland in bedrock outcrops and talus slopes	Possible
Metcalf Canyon jewelflower	<i>Streptanthus albidus</i> ssp. <i>Albidus</i>	FE	—	1B.1	Open areas in dry grassy meadows on serpentine soils	Not expected. Preferred serpentine substrate absent; Highly restricted distribution; Not observed.
Mt. Hamilton jewelflower	<i>Streptanthus callistus</i>	—	—	1B.3	Chaparral, cismontane woodland	Possible
Notes:						
Federal Status: 2020 USFWS Listing FE = Listed as endangered under the Endangered Species Act FT = Listed as threatened under the Endangered Species Act FC = Candidate for listing (threatened or endangered) under Endangered Species Act FD = Delisted in accordance with the Endangered Species Act — = Not federally listed			State Status: 2020 CDFW Listing SE = Listed as endangered under the California Endangered Species Act ST = Listed as threatened under the California Endangered Species Act SSC = Species of Special Concern as identified by CDFW CFP = Listed as fully protected under FGC CR = Species identified as rare by CDFW CE= Candidate for listing (threatened or endangered) — = Not state listed			
Habitat description: Habitat description adapted from CNDDDB and CNPS online inventory.						
Sources: California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Database. June and California Native Plant Society (CNPS), Rare Plant Program. 2020. Inventory of Rare and Endangered Plants of California. Website: http://www.rareplants.cnps.org . Accessed June 17, 2020.						

All proposed activities requiring vegetation removal including construction of trails, backpack camps, and drainage crossings have potential to impact the above listed special-status plants if present. Following a protocol-level rare plant survey, trail and camp alignments would be modified to avoid special-status plant species to the greatest extent practicable. With implementation of mitigation measures BIO-1 and BIO-7, potential impacts to special-status plants would be avoided. **Less than significant.**

Special-status Wildlife

Wildlife species' potential to occur in the Amendment area was evaluated based on presence of suitable habitats, occurrences recorded in the CNDDDB in the region, previous biological documents, and observations made during site surveys. Similarly, potential habitat suitability was determined for special-status wildlife species known to occur in the region. Search results from the CNDDDB indicate that nine special-status wildlife species have been documented in the

greater vicinity of the Amendment area (see Appendix A). Of these species, six have potential to occur within the Amendment area based on habitats observed during field surveys. Special-status wildlife species that were evaluated as having potential to occur in the Amendment area are included in Table 3, which includes habitat specifications.

Table 3: Special-status Wildlife Species Evaluated

Common Name	Scientific Name	Federal Listing	State Listing	Habitat Requirements	Potential to Occur
California tiger salamander	<i>Ambystoma californiense</i>	FT	ST	Need underground refuges, specifically ground squirrel burrows, and seasonal water sources for breeding	Low
Foothill yellow-legged frog (West/Central Coast Clade)	<i>Rana boylei</i>	—	SE	Partly-shaded, shallow streams and riffles with rocky substrate. Needs cobble-sized substrate for egg-laying	High
California red-legged frog	<i>Rana draytonii</i>	FT	SSC	Lowlands and foothills in or near perennial water sources with dense, shrubby, or emergent riparian vegetation	High
Tricolored blackbird (nesting colony)	<i>Agelaius tricolor</i>	—	ST	Requires open water, protected nesting substrate, and foraging area with insects	None
Burrowing owl	<i>Athene cunicularia</i>	—	SSC	Open, dry annual or perennial grasslands characterized by low-growing vegetation. Dependent on burrowing mammals (i.e. California ground squirrel)	Not expected
Bay checkerspot butterfly	<i>Euphydryas editha bayensis</i>	FT	—	Restricted to native grasslands on outcrops of serpentine soil. Plantago erecta is primary host plant	None
Western pond turtle	<i>Emys marmorata</i>	—	SSC	Aquatic species found in marshes, rivers, streams with aquatic vegetation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat for egg-laying	Possible
Coast horned lizard	<i>Phrynosoma blainvillii</i>	—	SSC	Most common in lowlands along sandy washes. Needs open areas for sunning, vegetation for cover, and abundant supply of ants and other insects	Possible
San Francisco dusky-footed woodrat	<i>Neotoma fuscipes annectens</i>	—	SSC	Inhabits oak and riparian woodlands with a well-developed understory in the San Francisco Bay Area. They exhibit high site fidelity and may live in the same nest community for generations. Nest structures are key indicator of their presence and are easily identified by their conical appearance.	Possible

Common Name	Scientific Name	Federal Listing	State Listing	Habitat Requirements	Potential to Occur
Notes:					
Federal Status: 2020 USFWS Listing FE = Listed as endangered under the Endangered Species Act FT = Listed as threatened under the Endangered Species Act FC = Candidate for listing (threatened or endangered) under Endangered Species Act FD = Delisted in accordance with the Endangered Species Act — = Not federally listed			State Status: 2020 CDFW Listing SE = Listed as endangered under the California Endangered Species Act ST = Listed as threatened under the California Endangered Species Act SSC = Species of Special Concern as identified by CDFW CFP = Listed as fully protected under FGC CR = Species identified as rare by CDFW CE= Candidate for listing (threatened or endangered) — = Not state listed		
Habitat description: Habitat description adapted from CNDDB. Source: California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Database. June 2020.					

All proposed activities requiring vegetation removal and work in or near creeks including construction of trails, backpack camps, and drainage crossings have potential to significantly impact the above-listed special-status wildlife species if present. Trail and camp alignments would be modified to avoid special-status wildlife species' habitat to the greatest extent practicable. Additionally, County Parks will obtain coverage through the Santa Clara Valley Habitat Plan (SCVHP) for all SCVHP-covered species and follow mitigation requirements defined in the SCVHP for each special-status wildlife species present within the SCVHP plan area. The SCVHP provides a framework for promoting the protection and recovery of natural resources, including endangered species, while streamlining the permitting process for planned development, infrastructure, and maintenance activities. The Plan will allow the County of Santa Clara and others to receive endangered-species permits for activities and projects they conduct and those under their jurisdiction.

For areas outside the SCVHP plan area and for species not covered by the SCVHP but within the SCVHP plan area, the project shall obtain a CDFW Incidental Take Permit for State-listed species (including foothill yellow-legged frog) and a Biological Opinion for federally listed species (including California red-legged frog). The Amendment would follow all requirements defined in agency-issued permits. Following these requirements, and with implementation of mitigation measures BIO-2, BIO-6, and BIO-7, potential impacts to special-status wildlife species would be reduced. **Less than significant.**

Additionally, suitable foraging and nesting habitat for raptors and other birds protected by the Migratory Bird Treaty Act (MBTA) and/or the California Migratory Bird Protections Act occurs within and adjacent to the Amendment area. Most native, breeding birds are protected under Fish and Game Code (FGC) Section 3503, and raptors specifically are protected under Section 3503.5. Additionally, both FGC Section 3513 and the MBTA prohibit killing, possession, or trading of migratory birds. FGC Section 3800 prohibits the taking of nongame birds and State Fully Protected species. Most raptors nest in mature, large trees and use twigs and branches as nesting material. Smaller raptors may nest in cavities in trees and anthropogenic structures. The nesting period for raptors generally occurs between February 15 and August 31.

Potential impacts could occur to resident and migratory species during construction of proposed Amendment improvements, which would render improvement areas temporarily unsuitable for

birds due to noise, vibrations, and increased activity levels. These activities could potentially subject birds to risk of death or injury, and they are likely to avoid using the area until such construction activities have dissipated or ceased. Relocation, in turn, could cause hunger or stress among individual birds by displacing them into adjacent territories belonging to other individuals. Removal of vegetation could also directly destroy nests, eggs, and immature birds if present. Adverse impacts to nesting birds and their habitat are potentially significant impacts which would be reduced to a less than significant level by implementing mitigation measure BIO-3. **Less than significant with mitigation incorporated.**

2. Construction of a bridge over Sulphur Creek and trail construction at or near smaller headwater drainages and Smith Creek could result in impacts to riparian vegetation. The project would avoid and minimize impacts to riparian habitats to the greatest extent practicable. Prior to work in riparian areas, the project would obtain coverage through the SCVHP, U.S. Army Corps of Engineers (USACE), San Francisco Bay Regional Water Quality Control Board (RWQCB), or CDFW, as applicable. Additionally, the project would follow mitigation requirements for any agreements with the previously identified agencies. . Potential permanent and temporary impacts to riparian habitat would be addressed through the SCVHP where applicable. Additionally, the project would follow mitigation requirements for any agreements with the previously identified agencies.

All proposed activities requiring vegetation removal, including construction of trails, backpack camps, and drainage crossings have potential to result in impacts to sensitive natural communities as defined by CDFW and the SCVHP. Following mapping of sensitive natural communities, trail and camp alignments would be modified to avoid and minimize impacts to sensitive natural communities to the greatest extent practicable. If unavoidable impacts are proposed, the project would follow mitigation requirements of the SCVHP. With implementation of these measures and mitigation measures BIO-1 and BIO-4 through BIO-7, potential impacts to natural sensitive communities would be reduced to a less-than-significant level.

Construction of new trails and bridge crossings may result in native tree and understory plant removal, impacts to tree root zones, trees along the trail corridor, and riparian trees at creek crossings. Native trees are particularly susceptible to disturbance, especially within the root crown and root zone (commonly referred to as the Root Protection Zone (RPZ), which is defined as 1.5 times the dripline radius measured from the tree trunk, and approximately three feet below the soil surface). Construction activities within the RPZ, including soil compaction or root cutting, could adversely affect mature native trees. Campsites and trails will be located outside the RPZ whenever possible.

Any ground disturbance, including trail development, can also facilitate spread or establishment of invasive species. Invasive seeds may be transported into the Amendment area via construction or maintenance equipment. Plants, seeds, straw, and mulch purchased for restoration efforts may contain seeds of noxious non-native species.

Construction may adversely impact native communities and vegetation, and facilitate spread of invasive plant species, and impacts would be potentially significant. However, mitigation measure BIO-5 would reduce impacts to a less than significant level. **Less than significant impact.**

3. Construction of crossings of Sulphur Creek, Smith Creek, and other headwater tributary crossings, or trail construction close to a wetland associated with a freshwater seep/spring in the

Amendment area could result in significant impacts to State or federally protected wetlands and tributaries. Following a jurisdictional delineation of State and federally protected wetlands and tributaries, trail alignments would be modified to avoid and minimize impacts to these features to the greatest extent practicable. If unavoidable impacts are proposed, the project would obtain coverage through the SCVHP, USACE, San Francisco Bay Regional Water Quality Control Board (RWQCB), or CDFW, as applicable. Smith Creek and Sulphur Creek are potential waters of the U.S., however, no impacts below the ordinary high-water mark are proposed. Additionally, the project would follow mitigation requirements for any agreements with the previously identified agencies. With implementation of these measures in addition to mitigation measure BIO-6, potential impacts to natural sensitive communities will be reduced to a less-than-significant level. **Less than significant with mitigation incorporated.**

4. Master Plan Amendment improvements would be low impact in nature. In the County, a significant impact on oak woodlands is defined as a 0.5-acre or more native oak canopy decrease within an oak woodland.¹⁸ The Master Plan Amendment would not remove or alter any of oak trees and therefore would not conflict with the Oak Woodlands Conservation Law. **No impact.**
5. The proposed project would convert, construct, and maintain trails and backpack camps for recreational use. The proposed trail alignments and camps would not substantially interfere with movement of any native migratory fish or wildlife species or impede use of native wildlife nursery sites. **Less than significant impact.**
6. The Amendment area is partially within the Habitat Plan Permit Area of the Santa Clara Valley Habitat Plan (SCVHP). As such, there is potential for SCHVP relevant plant and wildlife species to occur within the Amendment area. The SCVHP aims to protect and promote recovery of wildlife and plant species found throughout the 4,605-acre Habitat Plan Permit Area.

The SCVHP was designed “to protect, enhance, and restore natural resources in specific areas of Santa Clara County, while improving and streamlining the environmental permitting process for impacts on threatened and endangered species.” Local partners for the SCVHP include the County; the cities of San José, Morgan Hill, and Gilroy; Santa Clara Valley Water District; and Santa Clara Valley Transportation Authority. The SCVHP, which is a Habitat Conservation Plan/Natural Community Conservation Plan, was developed in collaboration with the United States Fish and Wildlife Service (USFWS) and CDFW. The SCVHP study area encompasses 519,506 acres, or approximately 62 percent of the County.

“Covered activities” in the SCVHP include projects and ongoing activities that receive incidental take authorization for potential impacts to covered species and supporting habitat. The SCVHP provides conservation measures to protect and maintain habitat areas to support 18 special-status “covered species,” consisting of nine wildlife species and nine plant species, within the Amendment area.¹⁹ In addition, the SCVHP sets forth a comprehensive, coordinated, and standardized mitigation and compensation program to ensure that conservation actions will be accomplished to streamline future mitigation requirements and achieve biological goals. Implementation of mitigation measure BIO-6 would reduce any potentially significant impacts to

¹⁸ Santa Clara County Planning Office. 2011. Guide to Evaluating Oak Woodlands Impacts. July 28.

¹⁹ Santa Clara Valley Habitat Agency. 2012. Santa Clara Valley Habitat Plan. August.

covered species to a less than significant level. **Less than significant with mitigation incorporated.**

7. All proposed activities requiring vegetation removal, including construction of trails, backpack camps, and drainage crossings, have potential to result in impacts to local natural communities as defined by the SCVHP. Following mapping of local natural communities, trail and camp alignments would be modified to avoid and minimize impacts to sensitive natural communities to the greatest extent practicable. For any unavoidable impacts, the project would follow mitigation requirements of the SCVHP and mitigation measures BIO-1 and BIO-4 through BIO-7. With implementation of these measures, potential impacts to local communities would be reduced to a less-than-significant level. **Less than significant with mitigation incorporated.**
8. There are two perennial creeks, several smaller perennial and intermittent streams and drainages, and one seasonal wetland on or near proposed Amendment improvements. Following a jurisdictional delineation of State and federally protected wetlands and tributaries, trail alignments would be modified to avoid and minimize impacts to these features to the greatest extent practicable. The trail alignment was designed to avoid streams to the maximum extent practicable to preserve natural resources and reduce future maintenance requirements. However, the trail alignment could pass through streams and riparian habitat under the potential jurisdiction of federal and State agencies. Stream crossings could include rock fords and one bridge. For all work proposed within riparian areas, all potential applicable permits would be obtained prior to construction. Potential permanent and temporary impacts to riparian habitat would be addressed through consultation with the previously identified regulatory agencies. The Department will continue to implement adaptive management strategies including managed grazing, reconnaissance surveys, and invasive plant control to maintain and enhance conditions for natural resources in the Amendment area. Compliance with conditions of applicable regulatory permits, requirements of the SCVHP, and mitigation measure BIO-6 would result in less than significant impacts to riparian areas. **Less than significant with mitigation incorporated.**
9. Trees will be avoided during project design but may need to be removed to avoid long-term impacts as a result of erosion, landslides, other sensitive habitat, etc. . Compliance with the County Tree Preservation Ordinance and SCVHP would be required for tree removal and to mitigate potential impacts to riparian and wetland habitats located on the SCVHP plan area. As such, the Master Plan Amendment would not adversely impact unique or heritage trees. **No impact.**
10. The Master Plan Amendment would be consistent with all local policies and regulations that protect biological resources. Compliance with the County Tree Preservation Ordinance and SCVHP would be required for tree removal and to mitigate potential impacts to riparian and wetland habitats located on the SCVHP plan area. Final trail alignments will avoid tree removal to the extent possible, particularly healthy mature trees. The project would follow all applicable mitigation as defined in the SCVHP. **Less than significant with mitigation incorporated.**

Mitigation

- BIO-1** To avoid impacts to special-status plants and sensitive plant communities, protocol-level rare plant and sensitive communities surveys shall be conducted prior to construction by a qualified biologist or County Parks Natural Resource Program Supervisor, or designee. The

surveys shall conform to current protocols established by the CDFW and CNPS and shall include surveys during appropriate blooming periods for every target species. Optimal survey times vary from year to year depending on temperature, rainfall amount, timing, etc., and shall be confirmed by monitoring of known reference populations for as many target species in the Master Plan Amendment's vicinity as possible. The final field positioning of each Master Plan Amendment's component shall avoid significant impacts to all observed special-status plant species and sensitive community occurrences.

BIO-2

The project shall obtain coverage through the SCVHP for all SCVHP-covered special-status species and shall follow mitigation requirements defined in the SCVHP for each special-status wildlife species present within the SCVHP plan area. For areas outside the SCVHP plan area, and for special-status species within the SCVHP plan area that cannot be covered by the SCVHP, the project shall obtain a CDFW Incidental Take Permit for State-listed species (including foothill yellow-legged frog) and a USFWS Biological Opinion for federally listed species (including California red-legged frog). The project shall follow all requirements defined in agency-issued permits and include at a minimum measures that would avoid take of foothill yellow-legged frog and California red-legged frog, including pre-construction surveys, environmental training of construction personnel, construction monitoring by a qualified biologist, and installation of wildlife exclusion fencing.

BIO-3

Construction activities that occur during the nesting season (generally March 1 to August 31) have the potential to disturb nesting sites for birds protected by the MBTA and FGC. Vegetation removal shall take place outside of the avian nesting season to the greatest extent possible. If vegetation removal is to occur during the nesting season, a pre-construction nesting bird survey shall be completed by a qualified biologist, or County Parks Natural Resources Supervisor, or designee. No action is necessary if no active nests are found, or if construction occurs during the non-breeding season (generally September 1 through February 14). Implementation of the following avoidance and minimization measures would reduce impacts to nesting birds:

1. To prevent impacts to MBTA-protected birds, nesting raptors, and their nests, removal of vegetation shall be limited to only those necessary to construct the proposed Amendment.
2. If vegetation removal is necessary, then it shall occur outside the nesting season between September 1 and February 14. If vegetation cannot be removed outside the nesting season, pre-construction surveys shall be conducted by a qualified biologist, or County Parks Natural Resources Supervisor, or designee three days prior to vegetation removal to verify absence of active nests.
3. If an active nest is located during pre-construction surveys, the USFWS and/or CDFW (as appropriate) shall be notified regarding the status of the nest. Construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned, or the agencies deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment

at a minimum 100-foot radius around an active raptor nest, and a 50-foot radius around an active migratory bird nest) or alteration of the construction schedule.

4. A qualified biologist, or County Parks Natural Resources Supervisor, or designee, shall delineate the buffer using Environmentally Sensitive Area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

BIO-4

To protect native trees and riparian trees, County Parks shall implement the following measures and include the wording of these measures in all final construction plans and specifications:

1. Work shall be minimized to the extent practicable within the RPZ around native trees.
2. If native trees greater than 12 inches in diameter at breast height are removed as part of the Amendment, all removals will be consistent with the County Tree Preservation Ordinance. Replanting sites shall be contiguous with existing woodlands and provide the greatest opportunities for wildlife movement and use. Replacement of lost trees shall follow the requirements of the County Tree Preservation Ordinance and SCVHP, where applicable.

BIO-5

To limit spread and new infestations of invasive plant species during construction and long-term management of the Amendment area, County Parks shall implement the following measures and include the wording of these measures in all final construction plans and specifications:

1. Any seed, straw, or mulch brought into the Amendment area shall be certified weed-free or inspected by a revegetation specialist or ecologist before use to confirm weed seed is not present. Use of native duff and debris may also be used for erosion control to reduce the amount of imported materials into the Amendment area.
2. Construction vehicles and other equipment such as mowers shall be cleaned of seed and soil from other sites before entering the Amendment area, after use within non-native annual grassland, and prior to entry into adjacent native habitats.
3. Revegetation of disturbed soil shall occur promptly after disturbance.
4. Only locally native plant species shall be used in the Amendment area for any site restoration, erosion control, or landscaping efforts. Propagules shall be collected on-site.

The following Best Management Practices for prevention measures of plant pathogen introductions will be incorporated into the project where applicable:

1. If possible, do not work in pathogen infested areas during wet, rainy, and cool times of the year and avoid working in muddy conditions.
2. If working in infested areas, the Project Manager shall inform all personnel of the presence of pathogen(s) and implement measures to prevent spread of disease including:

- Route equipment away from host plants and trees, especially areas with symptoms of diseases.
- Staging areas should be located away from both diseased and susceptible plants.
- After working in an infested area, remove accumulations of soil, mud, and organic material from shoes, boots, vehicles and heavy equipment.
- Disinfect boots, tools, and equipment with approved alcohol or bleach solution.
- During vegetation management activities, all vegetated materials should remain within the work site if possible.
- If materials are being removed from site for other purposes (i.e., firewood), the project manager should contact County Agricultural Commissioner or CAL FIRE for recommendations on safe removal and transport.

BIO-6 The County shall implement the following mitigation measures for bridge design to prevent adverse effects to creeks and riparian corridors, and include the wording of these measures in all final construction plans and specifications:

1. The County will consult with regulatory agencies on the bridge design and mitigate impacts as required by any applicable permits.
2. Use a bridge design that does not require installation of supports or any bridge elements below the top of the bank.
3. Design new trails to avoid first-order headwater drainages to the maximum extent practicable.

BIO-7 To avoid or minimize impacts to covered species listed in Table 1-2 of the SCVHP, all applicable conditions outlined in SCVHP Chapter 6: Conditions on Covered Activities and Application Process shall be implemented during each phase of the Master Plan Amendment that occurs with the SCVHP permit area.

E. Cultural/Historical/Archaeological Resources						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	<u>No Impact</u>	<u>Less Than Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Potentially Significant Impact</u>	<u>Cumulative</u>	
1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 of the CEQA Guidelines, or the County's Historic Preservation Ordinance (i.e. relocation, alterations or demolition of historic resources)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 40, 41
2. Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 19, 41, 42
3. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2,41, 42
4. Be located in a Historic District (e.g., New Almaden Historic District)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7, 10a
5. Disturb a historic resource or cause a physical change which would affect unique ethnic cultural values or restrict existing religious or sacred uses within the potential impact area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	3, 25, 42
6. Disturb potential archaeological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 10d, 41, 42

Discussion

FCS completed a Cultural and Paleontological Resources Constraints Analysis Technical Memorandum for the proposed Master Plan Amendment in November 2018, which is included as Appendix B.

On October 5, 2018, FCS staff conducted a records search at the Northwest Information Center (NWIC) in Rohnert Park, California that included the Amendment area and a 0.50-mile radius beyond Master Plan Amendment boundaries. Three historical resources lie within 0.5 mile of the Amendment area. Of the three recorded resources, one is located within 500 feet of the western Amendment boundary (Smith Creek Forest Fire Station on Mount Hamilton Road). The Fire Station is one of a few California Conservation Corps-era truck garages in the California Department of Forestry and Fire Protection (CAL FIRE) building collection retaining high historic integrity. The contemporary associated buildings have been replaced with newer facilities.

On October 5, 2018, FCS staff conducted a records search at the NWIC that included the Amendment area and a 0.50-mile radius beyond Amendment boundaries. There were no records found for the Amendment area, but one prehistoric archaeological resource was found within the search radius. The details is not provided in this document to protect the integrity of the resource.

On November 6, 2018, FCS received a response from the Native American Heritage Commission (NAHC) indicating that results from the Sacred Lands File search were positive for recorded sites in proximity to the Amendment area. The letter included a list of seven Native American tribal representatives that the

NAHC recommended contacting to determine tribal interest in the Amendment area, as well as additional information on tribal cultural resources (TCRs) in the Amendment vicinity. Letters were sent to these representatives via certified mail on June 23, 2020, which included summary information regarding the project and its location. During the 30-day period, one response was received from one of the tribal representatives (Amah Mutsun). The response stated that the tribal representative had examined the documents and had no specific information to add and that generally the sulfur springs were of special interest to Native peoples. No additional comments were received nor was consultation requested during the 30 day period, which ended on July 23, 2020.

Two pedestrian surveys were conducted in the Amendment area by FCS Senior Archaeologist Dr. Dana DePietro on September 5, 2018 and May 21, 2020. Neither survey revealed additional resources, however, lack of soil visibility and proximity to natural resources known to have been used by native peoples in the past were noted.

Impact Analysis

1. Despite their proximity to the Amendment area, all three historical resources near the Amendment area are located completely outside of the Amendment area and would remain unaffected by the Master Plan Amendment. Furthermore, the proposed improvements, including new locations for backpack camping, installation of a backcountry toilet, and conversion of existing ranch roads for trails, are low impact developments and unlikely to have an adverse effect on any undiscovered resources. There is always the possibility, however, that previously unknown historic resources exist below the ground surface. Therefore, implementation of Mitigation Measures CR-1 and CR-2 would ensure that this impact would be less than significant. **Less than significant with mitigation incorporated.**
- 2, 6. One archeological resource is located approximately 500 feet outside of the Amendment area and would remain unaffected by the Master Plan Amendment. The proposed improvements, including new locations for backpack camping, installation of a backcountry toilet, and conversion of existing ranch roads for trails, involve ground disturbance and therefore have the potential to have an adverse effect on undiscovered resources. Furthermore, the results of the NAHC Sacred Lands File search, proximity of a known prehistoric archaeological site, and proximity to natural resources used by native peoples in the past increases probability that additional resources may be found in the Amendment area. Therefore, implementation of Mitigation Measures CR-1 and CR-2 would ensure that this impact would be less than significant. **Less than significant with mitigation incorporated.**
3. No human remains are known to exist within the Amendment area. Furthermore, the proposed Master Plan Amendment is minimally invasive in terms of sub-surface activity, making discovery of human remains unlikely. However, there is always the possibility that construction activities such as grading could potentially damage or destroy previously undiscovered human remains. Accordingly, this is a potentially significant impact. However, if human remains are discovered, implementation of Mitigation Measure CR-3 would reduce this potential impact to a less than significant level. **Less than significant with mitigation incorporated.**
4. The Amendment area is not within a Historic District. **No impact.**

5. On November 6, 2018, FCS received a response from the NAHC indicating that results from the Sacred Lands File search were positive for TCRs in proximity to the Amendment area. The letter included a list of seven Native American tribal representatives that the NAHC recommended contacting to determine tribal interest in the Master Plan Amendment, as well as additional information on TCRs in the Amendment vicinity. The Cultural and Paleontological Resources Constraints Analysis Technical Memorandum recommended the County, being the lead agency, engage in tribal consultation pursuant to the recommendations of the NAHC and AB-52. Letters were sent to these representatives via certified mail on June 23, 2020, which included summary information regarding the project and its location. As of this date, one response has been received from one of the tribal representatives (Amah Mutsun. No additional comments were received nor was consultation requested during the 30 day period, which ended on July 23, 2020. As of this date, the County has not identified any significant TCRs pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024. **Less than significant with mitigation incorporated.**

Mitigation

- CR-1** Trail Construction crews will be trained by qualified archaeologists to recognize potentially significant cultural resources and appropriate procedures in the case of discovery of potentially significant cultural resources.
- CR-2** Potentially sensitive areas will be identified in a pre-construction survey by a qualified archaeologist. Based on pre-construction surveys, if there is any potential for unearthing cultural resources then monitoring will be required. Construction-related ground disturbance within these sensitive areas shall be monitored by a qualified archaeologist. Surface clearing and grubbing activities associated with trail construction do not require monitoring provided they are above ground, and do not impact sub-surface soils. If buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archeologist shall make recommendations to County Parks on measures that shall be implemented to protect discovered resources, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of, but are not limited to, stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the Amendment area should be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria.
- If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. Additional appropriate mitigation measures for significant resources could include avoidance or capping; incorporation of the site in green space, parks, or open space; or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until County Parks approves measures to protect these resources. Any archaeological artifacts recovered during mitigation shall be donated to a qualified scientific institution approved by County Parks where they would be afforded long-term preservation to allow future scientific study.

CR-3

If human remains are found during construction there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the Office of the Medical Examiner-Coroner of Santa Clara County is contacted to determine whether investigation of the cause of death is required. Additionally, excavation or disturbance shall stop until procedures outlined in the County Ordinance Code Title B, Division B6, Chapter II Relating to Indian Burial Grounds and Public Resources Code Section 5097.98 can be implemented. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours.

Per Public Resources Code Section 5097.98, the NAHC shall identify the person or persons it believes to be the most likely descendent(s) of the deceased Native American. The most likely descendent(s) may then make recommendations to the County or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. The most likely descendant(s) shall complete their inspection and make recommendations within 48 hours after being granted access to the site. The County or its authorized representative shall rebury the Native American human remains and any associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendent or in the Amendment area in a location not subject to further subsurface disturbance:

- (a) the NAHC is unable to identify a most likely descendent(s) or the most likely descendent(s) fails to make a recommendation within 48 hours after being allowed access to the site;
- (b) the most likely descendent(s) identified fails to make a recommendation; or
- (c) the County or its authorized representative rejects the recommendation of the most likely descendent(s), and mediation by the NAHC fails to provide measures acceptable to the County.

F. Energy						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
		No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	
1. Use non-renewable resources in large quantities or in a wasteful manner?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
2. Involve the removal of vegetation capable of providing summer shade to a building or significantly affect solar access to adjacent property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3

Impact Analysis

- The Master Plan Amendment would not use non-renewable resources in large quantities or in a wasteful manner. Construction of the proposed trails and associated improvements would be completed over a period of approximately nine years in four phases. During that time, energy would be required to operate construction equipment and transport construction workers and materials to the site. Construction of the Master Plan Amendment would be temporary and not use resources in large quantities or in a wasteful manner. State and federal regulations regarding standards for vehicles are designed to reduce wasteful, unnecessary, and inefficient use of energy for transportation; compliance with air quality best practices would reduce fuel consumption by reducing idling times of vehicles and equipment. **Less than significant impact.**
- The Master Plan Amendment would not include the removal of vegetation capable of providing summer shade to a building or significantly alter solar access to adjacent property. **No impact.**

Mitigation: None required.

G. Geology and Soils						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
		No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	
1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:						
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 17, 19
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 17
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 17
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 17
2. Result in substantial soil erosion or siltation or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 2, 3
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, collapse, shrink/swell potential, soil creep or serve erosion?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 17,
4. Be located on expansive soil, as defined in the report, <i>Soils of Santa Clara County</i> or California Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	14, 20, 21, 48
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3,5
6. Cause substantial compaction or over-covering of soil either on-site or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 5
7. Cause substantial change in topography or unstable soil conditions from excavation, grading, or fill?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 5,
8. Be located in an area designated as having a potential for major geological hazard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9b, 10c, 11a, 12a, 17
9. Be located on, or adjacent to a known earthquake fault?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9b, 10c, 11a
10. Be located in a Geologic Study Zone?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9b, 11a
11. Involve construction of a building, road, or septic system on a slope of:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	9b, 10c, 11a, 12a, 17
a. 30 percent or greater?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 10j, 11c
b. 20 percent to 30 percent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 10j, 11c
c. 10 percent to 20 percent?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 11c
12. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2,3,4,41

Discussion

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to prevent construction of buildings for human occupancy on the surface trace of active faults. The State Geologist is required to establish regulatory zones known now as Earthquake Zones of Required Investigation and to issue corresponding maps.²⁰ The County is located within the seismically active San Francisco Bay Area, though the Park is not located within an Earthquake Zone of Required Investigation. The General Plan outlines policies and regulations regarding design, location, and regulation of development to withstand geologic and seismic hazards.²¹ Ground shaking severity depends on numerous variables, such as magnitude, proximity to earthquake epicenter, local geology (including properties of unconsolidated sediments), groundwater conditions, and topographic setting.

Liquefaction refers to the sudden, temporary transformation of loose, saturated, granular sediments from a solid state to a liquefied state. Liquefaction related occurrences include seismically induced settlement, lateral spreading, and flow failure. Pursuant to the Seismic Hazards Mapping Act, the State identifies and maps areas that are prone to liquefaction, amplified ground shaking, and earthquake-induced landslides.

Landslides are gravity-driven movements of earth materials that may include unconsolidated sediment, rock, soil, or a combination of such materials. Various factors influence probability of a landslide and its relative level of risk, including steep terrain and expansive soils.

Impact Analysis

1. The closest active faults to the Amendment area are the Calaveras Fault Zone, approximately 3.3 miles west, and the Hayward Fault Zone, approximately six miles west.²² Strong ground shaking would likely occur at the Amendment area during an earthquake, due to the proximity of regional active faults. As with most areas of northern California, there exists potential for seismic events. However, no habitable dwellings would be constructed as part of the proposed Master Plan Amendment. The only new structure associated with the Master Plan Amendment is the backcountry toilet, which would be a prefabricated unit compliant with the seismic design parameters of the California Building Code (CBC). Accordingly, the Master Plan Amendment would not expose people or structures to potential adverse effects involving rupture of a known earthquake fault. **Less than significant impact.**
 - i) There are no known or potentially active faults that traverse the Amendment area, and the Amendment area is not located within an Alquist-Priolo Earthquake Fault Zone.²³ The Amendment area is within seismically active northern California, putting the entire area at risk of adverse effects due to strong seismic ground shaking. The potential severity of ground shaking depends on many factors, including distance from the originating fault, earthquake magnitude, and the nature of subsurface materials. The only structure that would be constructed as part of the proposed Master Plan Amendment is the backcountry

²⁰ California Geological Survey. 2019. EQ Zapp: California Earthquake Hazards Zone Application. April 4. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 30, 2020.

²¹ County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

²² United States Geological Survey (USGS). U.S. Quaternary Faults. Website: <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>. Accessed January 30, 2020.

²³ California Geological Survey. 2019. EQ Zapp: California Earthquake Hazards Zone Application. April 4. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 30, 2020.

toilet, which would be susceptible to strong seismic ground shaking. As a prefabricated unit, this new structure would conform to the seismic design parameters of the 2019 CBC pertaining to seismic safety design, thereby reducing and preventing potential impacts. **Less than significant impact.**

- ii) Strong seismic shaking can cause ground failure such as liquefaction. Liquefaction-related occurrences include seismically induced settlement, lateral spreading, and flow failure. The California Department of Conservation produces maps of liquefaction hazard zones throughout the state. The Amendment area has not been evaluated for liquefaction by the State.²⁴ However, the County has determined that the area is located outside of a liquefaction hazard zone.²⁵ Since no habitable dwellings would be constructed as part of the proposed Master Plan Amendment, the risk of exposing people or structures to adverse effects related to liquefaction would be remote. As mentioned, the backcountry toilet would be the only new structure associated with the Master Plan Amendment. Because it would be a prefabricated unit, it would comply with the applicable seismic design standards in the CBC and any potential impacts due to ground-failure and liquefaction would be less than significant. **Less than significant impact.**
- iii) The Amendment area has not been evaluated for landslides by the State. However, the County has determined that the area is within a County Landslide Hazard Zone.^{26,27} This is an existing condition that would not be exacerbated by the Master Plan Amendment. There is no housing located within the Amendment area, and the Master Plan Amendment would not introduce new permanent dwellings that would expose a significant number of Park visitors to landslide risk.

The Sulphur Springs Ranch Backpack Camp would construct the camp area terraced along a steep slope, and the Valley Oak Backpack camp area would be terraced into a steep hillside. Given the general topography of sloping canyons in the Amendment area, these locations do not present higher risks than others. The campsites themselves would be graded and compacted to be flat and reduce immediate landslide risk.

Furthermore, campers would be required to obtain a campsite permit with their reservation, which includes the rules and risks of backpack camping. Additionally, the County retains the ability to close the Park and its camps to visitors in the event of weather conditions or seismic events that increase risk of landslides. **Less than significant impact.**

- 2. The Park is subject to erosion by periodic and seasonal heavy rain, winds, and other storm events. With the implementation of the Master Plan Amendment, most erosion potential or loss of topsoil would occur during grading and excavation. Grading and ground disturbance increase the potential for accelerated erosion by removing protective vegetation or cover and changing natural drainage patterns. Grading would be necessary to improve the ranch road to an access

²⁴ California Geological Survey. 2019. EQ Zapp: California Earthquake Hazards Zone Application. April 4. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 30, 2020.

²⁵ County of Santa Clara. 2012. Geologic Hazard Zones. October 26.

²⁶ California Geological Survey. 2019. EQ Zapp: California Earthquake Hazards Zone Application. April 4. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 30, 2020.

²⁷ County of Santa Clara Planning Office. Online Property Profile. Websites: www.sccplanning.org/gisprofile/profile_web.html?apn=62706002; www.sccplanning.org/gisprofile/profile_web.html?apn=62707013; www.sccplanning.org/gisprofile/profile_web.html?apn=62707014. Accessed January 22, 2020.

road for the Sulphur Springs Ranch Backpack Camp, repurpose other existing ranch roads into multi-use trails, and prepare campsite pads. Excavation of less than 250 cubic feet for the new backcountry toilet would be required at Sulphur Springs Ranch Backpack Camp. Short-term construction activities could potentially result in substantial soil erosion or loss of topsoil. Construction activities (including clearing, grading, trenching, and excavation), while minor, could instigate or accelerate soil erosion or the loss of topsoil. During the construction phase, high winds, rainfall, or other storm events could contribute to erosion impacts. As such, the proposed Master Plan Amendment would be constructed in accordance with a (National Pollution Discharge Elimination System) NPDES Permit. Compliance with the NPDES Permit would include development and implementation of a Water Quality Management Plan, Stormwater Pollution Prevention Plans (SWPPP), and BMPs aimed at reducing on-site soil erosion and the loss of on-site topsoil if there is disturbance of greater than one acre.

To reduce potential soil loss due to construction, the Parks Department would implement County-specific erosion control measures as described in the Uniform Interjurisdictional Trail Design, Use, and Management Guidelines and comply with the NPDES SWPPP. These measures would help contain soil and filter runoff from distributed areas with use of vegetated filters, silt fencing, straw wattles, plastic sheeting, catch basins, or other means necessary to prevent escape of sediment from disturbed areas. These measures would also prohibit placement of earth or organic material where it may be directly carried into a stream, swale, ditch, marsh, pond, or body of standing water; avoid construction on unstable slopes and other areas subject to soil erosion where possible; require management techniques that minimize soil loss and erosion; manage grading to maximize capture and retention of water runoff through ditches, trenches, siltation ponds, or similar measures; and minimize erosion through adopted protocols and standards in the industry. County Parks and/or its contractors would further be required to implement a monitoring program to verify effectiveness of BMPs implemented as part of the SWPPP. With implementation of these minimization measures, impacts from the Master Plan Amendment to soil erosion and loss of topsoil would be less than significant. **Less than significant impact.**

As in the construction phase, long-term operation activities could potentially result in soil erosion or the loss of topsoil. During Amendment operation, both paved and soft surface trails would likely be less susceptible to soil erosion than during construction. However, surface erosion may occur where steep slopes exist. Routine trail maintenance is proposed to prevent substantial soil erosion on and around trails, especially following significant storm events. The County's Trail Management Guidelines; Uniform Interjurisdictional Trail Design, Use, and Management Guidelines; and Santa Clara Valley Water District Water Resources Protection Manual specify trail siting, construction, and maintenance considerations to reduce erosion or siltation to the maximum practicable extent.²⁸ Therefore, potential long-term impacts would be less than significant. **Less than significant impact.**

3. There is low liquefaction risk within the Amendment area and construction of trails and backpack camps would not exacerbate the existing risk of landslides, as described above. Soil

²⁸ Santa Clara County Interjurisdictional Trails Committee. 1999. Uniform Interjurisdictional Trail Design, Use, and Management Guidelines. April 15.

conditions in the Amendment area, as well as geologic conditions on- and off-site, make lateral spreading, subsidence, liquefaction, or collapse unlikely. The Master Plan Amendment would not introduce permanent new habitable structures, and the County retains authority to close or restrict access to any part of the Park in the event of poor weather or seismic activity that could result in increased landslide or subsidence risks. Associated impacts would be less than significant. **Less than significant impact.**

4. Soil in the Amendment area consists mostly of Gaviota loam, Gaviota gravelly loam, and Los Gatos-Gaviota complex. There is also a small amount of Vallecitos rocky loam underlying a portion of the proposed Sulphur Springs Ranch Backpack Camp, which has a moderate expansion potential.²⁹ However, the construction of the backcountry toilet concrete pad would conform to all applicable State and local construction codes and ordinances. Therefore, potential for substantial risks to life or property from expansive soils as a result of the Master Plan Amendment would be less than significant. **Less than significant impact.**
5. The Park is located within an unincorporated of the County and relies on septic systems. However, the Master Plan Amendment would not expand any septic infrastructure. The single backcountry toilet proposed at the Sulphur Springs Ranch Backpack Camp would qualify as a holding tank according to the County On-site Wastewater Treatment System Ordinance Section B11-76 and does not require any specific soil types for safe operation.³⁰ **No impact.**
6. Soil would be mechanically compacted for the campsites and the compacted area limited to a total area of 3,712 square feet. Soil would also be compacted during construction equipment use and underfoot on trails, especially within and between backpack camps. The design of the campsite would avoid compaction within the RPZ of trees whenever possible. The Master Plan Amendment would not cause substantial compaction of soil. **Less than significant impact.**
7. Minimal grading would be implemented during construction of trails and campsites associated with the Master Plan Amendment. The backcountry toilet would require excavation to install the holding vault, however this would be relatively minimal, and is the only excavation activity associated with the Master Plan Amendment. The backcountry toilet would not significantly change topography in the Amendment area. Therefore, the Master Plan Amendment would not cause a substantial change in topography. **Less than significant impact.**
8. The Amendment area is in a seismically active area. However, as discussed in Impacts 1 and 3, geologic risks would be less than significant as no residential uses are proposed as part of the Master Plan Amendment and visitors would be on-site temporarily at their own risk. **Less than significant impact.**
9. As discussed in Impact 1(i), the Amendment area is less than five miles from an active earthquake fault, but not on or adjacent to one. **No impact.**
10. The Amendment area is not in a Geologic Study Zone (now called Earthquake Zones of Required Investigation).³¹ **No impact.**

²⁹ United States Department of Agriculture, Natural Resources Conservation Service. 2019. Web Soil Survey 3.3.2. September 16. Website: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed June 11, 2020.

³⁰ County of Santa Clara. 2013. County of Santa Clara Ordinance Code Section B11-76 – Holding tanks; portable toilets. November 26.

³¹ California Geological Survey. 2019. EQ Zapp: California Earthquake Hazards Zone Application. April 4. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed January 30, 2020.

11. The Master Plan Amendment does not propose septic systems. The only building proposed is the backcountry toilet. According to the USDA Web Soil Survey and the toilet's proposed location, the backcountry toilet would be installed in an area with 15 to 30 percent slopes.³² However, the backpack camp area and toilet location would be graded to ensure flat surfaces. Additionally, implementation of SWPPP BMPs as discussed would reduce potential erosion from steeper slopes.

The existing ranch road from Mount Hamilton Road to the Sulphur Springs Ranch Backpack Camp would be improved to decrease hazards for use as a service and maintenance access road, including reducing the grade. As part of the Master Plan Amendment, this road would be improved to include an 80-foot diameter turnaround at the road base, widen the road base to 12 feet, and reduce the grade in two sections. As designed, the Master Plan Amendment would not involve construction of a roadway on slopes of greater than 20 percent. **Less than significant impact.**

12. Fossils of plants, animals, or other organisms of paleontological significance have not been discovered in the Amendment area, nor has the area been identified to be within an area where such discoveries are likely.³³ The type of depositional environment in the Amendment area typically does not present favorable conditions for discovery of paleontological resources, and the Master Plan Amendment is minimally invasive (no greater than 10 feet disturbance in depth) in terms of sub-surface activity. As such, it is highly unlikely that paleontologically sensitive alluvial deposits would be disturbed, as they are generally present at greater depths than proposed in the Master Plan Amendment. In this context, the Master Plan Amendment would not result in impacts to paleontological resources or unique geologic features. However, if significant paleontological resources are discovered, implementation of mitigation measure GEO-1 would reduce this potential impact to a less than significant level. **Less than significant with mitigation incorporated.**

Mitigation

GEO-1 If a fossil is discovered during excavations of 10 feet or more below ground surface, excavation activity within 50 feet of the find shall be temporarily halted or delayed until the find is examined by a qualified paleontologist in accordance with Society of Vertebrate Paleontology standards. The County shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If the find is determined to be significant and avoidance is not feasible, the paleontologist shall design and carry out a data recovery plan consistent with the Society of Vertebrate Paleontology standards. The County shall implement this mitigation measure and include the wording of this measure in all final construction plans and specifications.

³² United States Department of Agriculture, Natural Resources Conservation Service. 2019. Web Soil Survey 3.3.2. September 16. Website: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed June 11, 2020.

³³ Finger, Kenneth L. 2018. Paleontological Records Search: Joseph Grant Park Project. October 1.

H. Greenhouse Gas Emissions						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	<u>No Impact</u>	<u>Less Than Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Potentially Significant Impact</u>	<u>Cumulative</u>	
1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3
3. Would the project increase greenhouse gas emissions that hinder or delay the State's ability to meet the reduction target (25 percent reduction by 2020) contained in CA Global Warming Solutions Act of 2006 (AB 32)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4

Discussion

The Amendment area is located within Santa Clara County, which is regulated by BAAQMD. BAAQMD has not established a significance threshold for construction greenhouse gas (GHG) emissions. BAAQMD's significance threshold for operational GHG emissions is 1,100 metric tons of carbon dioxide equivalent (MT CO₂e) per year. The thresholds recommended in BAAQMD's 2017 Guidelines for project-level operational GHG generation are as follows:

- **Compliance with a qualified Greenhouse Gas Reduction Strategy, or**
- **1,100 MT CO₂e per year, or**
- **4.6 MT CO₂ equivalent per service population (employees plus residents).**

It should be noted that the BAAQMD's thresholds of significance were established based on meeting the 2020 GHG targets set forth in the AB 32 Scoping Plan.

The BAAQMD has not updated their recommended GHG emissions thresholds to address target reductions past 2020. However, consistent with current State directives (AB 32 and AB 398), the updated target requires an additional 40 percent reduction in GHG emissions by 2030. Applied to the BAAQMD quantitative thresholds based on 2020 AB 32 GHG reduction goals, this would equate to 660 MT CO₂e per year by 2030, or 2.6 MT CO₂e per year per service population by 2030.³⁴ Qualified GHG Strategies remain an appropriate threshold if the project's full buildout year falls within the time horizon covered within a Qualified GHG Strategy, and if the Qualified GHG Reduction Strategy demonstrates compliance with post-2020 GHG reduction goals.

³⁴ Association of Environmental Professionals (AEP). 2016. Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. October 18.

The Amendment area is currently not open to the public for recreational uses. Portions of the Amendment area are used for grazing operations. Current GHG emissions resulting from human activities are minimal and primarily associated with vehicle trips to and from the Amendment area.

Impact Analysis

1. The Master Plan Amendment would generate GHG emissions during construction activities such as site preparation, grading, on-site construction vehicle use, vehicles hauling materials to and from the Amendment area, and construction worker trips. These emissions are considered temporary or short-term. The 10-year phasing of the Project would include planning, design and permitting. Construction activities would take place over the years in phases and would not be a continual 10-years of construction. Additional truck trips resulting from increased visitation and construction would include pumper trucks, delivery trucks, garbage trucks, maintenance vehicles, and fire protection vehicles, as necessary. If these trips occurred on a weekly basis, they would average four truck trips per week. This increase is not substantial in relation to existing traffic load and capacity and emissions would likely be below applicable thresholds.

Operational or long-term emissions would occur over the life of the Master Plan Amendment. Sources would mainly be GHG emissions contained in exhaust from cars and trucks that would travel to and from the Park. The County estimates a maximum of approximately 1,350 additional campers annually at backpack camp buildout. Conservatively assuming each camper brings their own vehicle and campers are distributed throughout the year, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily, or 25 vehicles per week on average.

A preliminary screening method is provided in BAAQMD's 2017 Guidelines for operational GHGs.³⁵ The preliminary screening can be used to indicate whether a project's operational GHGs could potentially exceed BAAQMD's thresholds of significance. Based on BAAQMD screening criteria, operation of a park general land use would result in a less than significant impact if the project size is less than 600 acres. The Amendment area is 1,155 acres, however proposed developments in the Master Plan Amendment would encompass approximately five acres for backpack camp installation and trail improvements and be below the applicable screening threshold. Furthermore, the Master Plan Amendment proposes improvements that would extend similar recreational land use activities of the existing Park. Because the Master Plan Amendment would not exceed BAAQMD's screening threshold based on size, ongoing project operations would not be considered to have potential to generate GHG emissions that would have a significant impact on the environment. Therefore, the operational-related emissions would result in a less than significant impact. **Less than significant impact.**

2. The County of Santa Clara Climate Action Plan (CAP) for Operations and Facilities adopted in 2009 applies to County operations, facilities, and employee behavior. The CAP includes a goal of reducing County GHG emissions by 10 percent every five years until 2050 when it aims to reach 80 percent reduction.³⁶ The CAP does not identify mandatory provisions, but the State has adopted regulations that will help the County achieve its reduction goal. Motor vehicle emissions associated with the Master Plan Amendment would be reduced through compliance

³⁵ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. May.

³⁶ County of Santa Clara, Climate Action Team. 2009. County of Santa Clara Climate Action Plan for Operations and Facilities. September 29.

with state regulations on fuel efficiency and fuel carbon content. Regulations include the Pavley fuel efficiency standards that require manufacturers to meet stringent fuel mileage rates for vehicles sold in California, and the Low Carbon Fuel Standard that requires reductions in average carbon content of motor vehicle fuels.³⁷ The Master Plan Amendment would not conflict with the County CAP or regulations adopted by the State to reduce GHG. **Less than significant impact.**

3. The Master Plan Amendment would not increase GHG emissions such that the State's ability to meet the AB 32 or Senate Bill 32 reduction targets would be hindered or delayed. Emissions during construction from construction equipment would be short term and temporary. The 10-year phasing of the Project would include planning, design and permitting. Construction activities would take place over the years in phases and would not be a continual 10-years of construction. **Less than significant impact. Mitigation:** None required.

³⁷ California Environmental Protection Agency and California Air Resources Board. 2019. Low Carbon Fuel Standard. Website: <https://ww3.arb.ca.gov/fuels/lcfs/lcfs.htm>. Accessed January 30, 2020.

I. Hazards and Hazardous Materials						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 4, 5
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 4, 53
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 5, 9d
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 4, 5, 53
5. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3
6. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 10g
7. Involve risk of explosion or release of hazardous substances (including pesticides, herbicides, toxic substances, oil, chemicals, or radioactive materials)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 4, 5
8. Provide breeding grounds for vectors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
9. Proposed site plan result in a safety hazard (i.e., parking layout, access, closed community, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
10. Involve construction of a building, road, or septic system on a slope of 30 percent or greater?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 17
11. Involve construction of a roadway greater than 20 percent slope for a distance of 300' or more?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 17
12. Be located within 200' of a 230KV or above electrical transmission line?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 4
13. Create any health hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 4, 5
14. Expose people to existing sources of potential health hazards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4, 53
15. Be located in an Airport Land Use Commission Safety Zone?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	31

16. Increase fire hazard in an area already involving extreme fire hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10g
17. Be located on a cul-de-sacs over 800 ft. in length and require secondary access which will be difficult to obtain?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2
18. Employ technology which could adversely affect safety in case of a breakdown?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2

Discussion

The improvements that would be implemented as part of the Master Plan Amendment would be in accordance with General Plan Policy GC-PR 12, “Parks and trails in remote areas, fire hazardous areas, and areas with inadequate access should be planned to provide the services or improvements necessary to provide for the safety and support of the public using the parks and to avoid negative impacts on the surrounding areas.”

The Amendment area and adjacent properties are not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. According to CAL FIRE the Amendment area is located within a High Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA).³⁸ County Parks standards and policies for wildfire prevention are listed below and would be implemented during all phases of construction and during operation of the Master Plan Amendment to control potential fire hazards:

- Comply with the Santa Clara County Parks Rangeland Management Policy.
- Smoking is prohibited in all Santa Clara County Parks.
- Campfires would not be allowed in the proposed Amendment Area.
- Operations staff routinely enforce all Park regulations.
- County Parks implements a series of fire protection practices in its day-to-day operations such as the establishment of shaded fuel breaks along roads and trails and fuel management around developed sites and public use areas.
- County Parks Operations, Maintenance, and Natural Resource Management staff are trained in wildland fire suppression techniques.
- Temporarily closing trails when conditions become unsafe or environment resources are severely impacted. Such conditions include soil erosion, flooding, fire hazard and environmental damage in accordance with General Plan C-PR 30.

County Parks also operates under a Memorandum of Understanding with CAL FIRE that requires staff to implement fire prevention practices (i.e., checking fire forecast conditions, monitoring weather, and having fire suppression equipment on-hand) to reduce chances of accidental ignition during vegetation

³⁸ California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed January 31, 2020.

maintenance operations. Under high fire danger conditions, all activities with a risk of wildfire initiation are halted.

Impact Analysis

1. Short-term construction activities associated with construction of the backpack camps could potentially use hazardous materials, specifically those associated with operation of construction equipment and vehicles (i.e. fuel, lubricants, etc.). These hazardous materials would not be of a type, or occur in sufficient quantities, to pose a significant hazard to public safety or the environment. Much like the construction phase itself, their uses would be temporary in nature and comply with all local, State, and federal regulations. Long-term operation activities are not anticipated to transport, use, or dispose of hazardous materials. Therefore, impacts would be less than significant. The 10-year phasing of the Project would include planning, design and permitting. Construction activities would take place over the years in phases and would not be a continual 10-years of construction. **Less than significant impact.**
2. Hazardous materials such as gasoline, diesel fuels, lubricants, and other materials associated with operation and maintenance of machinery would be used on-site during construction. These limited quantities of hazardous materials would not create a significant hazard to the public or environment. Transportation, use, and disposal of hazardous materials would comply with applicable federal, State, and local regulations, minimizing potential for accident or upset to the maximum extent practical. **Less than significant impact.**
3. There are no schools near the Amendment area. Additionally, the Master Plan Amendment would not involve use of acutely hazardous materials. **No impact.**
4. A Phase I environmental site assessment update was conducted in 2010 for the Nolan easement portion of the proposed Amendment area. No environmental hazards were detected.³⁹ Databases such as the State Water Resources Control Board's GeoTracker and the Department of Toxic Substances Control's EnviroStor, which track cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites, were consulted as part of the Phase I. The Amendment area is not included on any lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5.^{40,41,42,43} **No impact.**
5. Mount Hamilton Road is considered an evacuation route for the Park.⁴⁴ The proposed backpack camps are concentrated in a small portion of the Amendment area and would not affect Mount Hamilton Road, and all trail improvements would be away from the road. Master Plan Amendment improvements would not impede or interfere with emergency response planning. The amount of additional vehicles on Mount Hamilton Road is negligible. **No impact.**

³⁹ Diablo Green Consulting. 2012. Phase I Environmental Site Assessment Update for Nolan Property. July 6.

⁴⁰ State of California Department of Toxic Substances Control (DTSC). 2020. EnviroStor Hazardous Waste and Substances Site List. Website: <https://www.envirostor.dtsc.ca.gov/public/map/>. Accessed January 31, 2020.

⁴¹ California State Water Resources Control Board (State Water Board). 2015. GeoTracker List of Open Active Leaking Underground Storage Tank Sites. Website: <https://geotracker.waterboards.ca.gov/map>. Accessed January 31, 2020.

⁴² California State Water Resources Control Board (State Water Board). Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit.

⁴³ California State Water Resources Control Board (State Water Board). List of "active" CDO and CAO.

⁴⁴ SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 18 – County of Santa Clara Parks and Recreation Department. August.

6. CAL FIRE designates the Amendment area as an High FHSZ in an SRA.⁴⁵ However, compliance with State and local regulations, including the California Fire Code, Local Hazard Mitigation Plan, and County fire standards and practices, would reduce risks to the maximum extent practical. Campfires would be prohibited at the backpack camps, though camp stoves would be allowed on elevated cook stove pads. Regular maintenance activities on trails and at camps, such as vegetation removal and campsite earth compaction, would reduce potential impacts from wildland fires. Lastly, the CAL FIRE Smith Creek Station is just outside the western boundary of the Amendment area between it and the existing Park, and provides wildland fire protection services and response during fire season when the station is staffed to protect people and structures.⁴⁶ Furthermore, Park staff monitor facilities for fire danger and would enforce prohibition of campfires at the Amendment area campsites. Park ranger vehicles are equipped with fire suppression equipment and ranger staff are qualified to initiate wildfire suppression, if necessary, before CAL FIRE could arrive. The County retains authority to evacuate and close the Park to visitors in the event of wildfire. **Less than significant impact.**
7. The Master Plan Amendment would involve very little risk of explosion or release of hazardous substances (see Impact 2). Hazardous materials such as gasoline, diesel fuels, lubricants, and other flammable or explosive materials associated with operation and maintenance of machinery would be used on-site during construction. Much like the construction phase itself, their uses would be temporary in nature and comply with all local, State, and federal regulations. The 10-year phasing of the Project would include planning, design and permitting. Construction activities would take place over the years in phases and would not be a continual 10-years of construction. **Less than significant impact.**
8. The Master Plan Amendment would not provide breeding grounds for vectors. **No impact.**
9. The Master Plan Amendment would not result in a safety hazard associated with site access. Restricted vehicular access to the Sulphur Springs Ranch Backpack Camp would be provided from a gated ranch road extending from Mount Hamilton Road. Additional routes would be repurposed as access roads between the two backpack camps and along the existing southern segment of the Manzanita Trail. These access roads would provide emergency access to both camps and new trails. Park staff and other emergency officials could access trails on ATVs and UTVs. However, the Amendment area is not vehicle accessible by the public, and timely evacuations could be difficult without help. Therefore, there would be less than significant impacts related to safety hazards and site access. **Less than significant impact.**
10. See Geology and Soils Impact 11. **Less than significant impact.**
11. The existing ranch road from Mount Hamilton Road to the Sulphur Springs Ranch Backpack Camp would be improved to decrease hazards for use as a service and maintenance access road, including reducing the grade. As part of the Master Plan Amendment, this road would be improved to include an 80-foot diameter turnaround at the road base, widen the road base to 12 feet, and reduce the grade in two sections. As designed, the Master Plan Amendment would

⁴⁵ California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed January 31, 2020.

⁴⁶ SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 13 – Unincorporated Areas without Local Fire Protection. August.

not involve construction of a roadway on slopes of over 20 percent for 300 feet or more. **No impact.**

12. The Amendment area is not within 200 feet of any electrical transmission line.⁴⁷ **No impact.**
13. The Master Plan Amendment would not create a health hazard. The backcountry toilet would require an operating permit from the County Department of Environmental Health, ensuring there would be no health hazards.⁴⁸ **No impact.**
14. The Master Plan Amendment would not expose people to existing sources of potential health hazards as none are identified for the Amendment area. **No impact.**
15. The nearest airport to the Amendment area is the Norman Y. Mineta San José International Airport, approximately 16 miles to the west. The Amendment area is not within its Airport Land Use Commission Safety Zones.⁴⁹ **No impact.**
16. CAL FIRE designates the Amendment area as a High FHSZ in an SRA, which is not considered an extreme fire hazard for the purposes of this analysis.⁵⁰ Therefore, the Master Plan Amendment would not increase fire hazard in an area already involving an extreme fire hazard. **No impact.**
17. The Amendment area would not be on a cul-de-sac. **No impact.**
18. The Master Plan Amendment would not employ any technology, and therefore could not adversely affect safety in case of a breakdown. **No impact.**

Mitigation: None required.

⁴⁷ California Energy Commission. California Electric Infrastructure App. Website: <https://cecgis-caenergy.opendata.arcgis.com/app/ad8323410d9b47c1b1a9f751d62fe495>. Accessed June 11, 2020.

⁴⁸ County of Santa Clara. 2013. County of Santa Clara Ordinance Code Section B11-76 – Holding tanks; portable toilets. November 26.

⁴⁹ Windus, Walter B. 2016. Comprehensive Land Use Plan: Santa Clara County – Norman Y. Mineta San Jose International Airport. November 16.

⁵⁰ California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed January 31, 2020.

J. Hydrology and Water Quality						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	46, 47, 51,
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 4
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river in a manner which would:						2, 3, 10e
i) result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Place a structure within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 12c
5. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 12c
6. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4
7. Result in an increase in pollutant discharges to receiving waters?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 10e
8. Be located in an area of special water quality concern (e.g., Los Gatos or Guadalupe Watershed)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4,
9. Result in use of well water previously contaminated by nitrates, mercury, asbestos, etc. existing in the groundwater supply?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10e,
10. Result in a septic field being constructed on soil with severe septic drain field limitations or where a high water table extends close to the natural land surface?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3

11. Result in a septic field being located within 50 feet of a drainage swale; 100 feet of any well, water course or water body or 200 feet of a reservoir at capacity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,2,3,4
12. Conflict with Water Resources Protection Collaborative Guidelines and Standards for Land Uses near Streams?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	22, 51
13. Result in extensions of a sewer trunk line with capacity to serve new development?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3
14. Require a NPDES permit for construction [Does it disturb one (1) acre or more]?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 46
15. Result in significant changes to receiving waters quality during or following construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	46,47
16. Is the project tributary to an already impaired water body? If so will the project result in an increase in any existing pollutants?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	46,47
17. Substantially change the direction, rate of flow, or quantity, or quality of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,3,46
18. Interfere substantially with ground water recharge or reduce the amount of groundwater otherwise available for public water supplies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 10e, 11b
19. Involve a surface water body, natural drainage channel, streambed, or water course such as to alter the amount, location, course, or flow of its waters?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 11c,
20. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 5, 12c
21. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	51

Discussion

According to the Federal Emergency Management Agency Flood Insurance Rate Map, the Amendment area is not within a 100-year flood hazard area or located near a levee or dam.⁵¹ The closest dam is the Anderson Dam, approximately 11 miles south of the Amendment area. No structures would be placed within a 100-year flood hazard as part of the Master Plan Amendment.

Impact Analysis

1. The Amendment area lies approximately 18.5 miles southeast from San Francisco Bay and 11 miles north of the Anderson Dam and Reservoir. The Master Plan Amendment proposes two backpack camps in a small area, trail improvement/ development throughout other areas, and installation of a backcountry toilet at the Sulphur Springs Ranch Backpack Camp. The toilet would qualify for a holding tank exemption according to the County On-site Wastewater

⁵¹ Federal Emergency Management Agency (FEMA). FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search>. Accessed January 31, 2020.

Treatment System Ordinance Section B11-76 and would require an operating permit, which provides approval of the tank pumper, maintenance schedule, tank/sewage level monitoring, and reporting requirements.⁵² Compliance with applicable regulations would reduce potential impacts to water quality to the maximum practicable extent.

The Master Plan Amendment involves improvements in a small portion of the greater context of the Amendment area, including a wet trail crossing over Smith Creek in the Manzanita Trail Extension and a prefabricated bridge over Sulphur Creek in the Smith Creek Trail Extension. The Amendment would be required to comply with applicable water quality laws and regulations, including the Clean Water Act, Porter-Cologne Water Quality Control Act, and Santa Clara County On-site Wastewater System Ordinance. The County's Trail Management Guidelines, Uniform Interjurisdictional Trail Design, Use, and Management Guidelines, Santa Clara Valley Water District Water Resources Protection Manual specify trail siting, construction, and maintenance considerations to reduce erosion or siltation to the maximum practicable extent.⁵³ The wet crossing would follow mitigation requirements of the SCVHP, USACE Section 404 permitting, RWQCB permit, and CDFW Lake and Streambed Alteration Agreement. With implementation of these measures in addition to mitigation measure BIO-6, impacts would be less than significant. **Less than significant with mitigation.**

2. Forty percent of the County's water supply originates from both groundwater and reservoirs, five percent comes from recycled water, and the remaining 55 percent emanates from the Sacramento-San Joaquin River Delta and Hetch Hetchy system.⁵⁴ Potable water used in the Park is well water.⁵⁵ No potable water would be provided in the Amendment area; visitors would have to pack in or filter their own from Smith Creek. Overall, Plan components would not require substantial amounts of water and would not substantially deplete groundwater supplies or interfere with groundwater recharge, as groundwater pumped for the Park constitutes a negligible amount of the County water supply. **No impact.**
3. i, ii) The greater vicinity of the Park includes several creeks; however, Master Plan Amendment components would not include construction of paved trails or roads that would introduce impervious surfaces to previously pervious, undeveloped areas, or otherwise necessitate substantially altering existing drainage patterns of the area or the course of a stream or river. The concrete backcountry toilet pad would add minimal impervious surfaces compared to existing conditions. During storm events resulting in ground saturation and excessive surface runoff, natural surfaces and vegetation would allow surface runoff to percolate into surrounding subsurface soils. The backpack campsites would be constructed on a gently sloping pad of compacted native soil to facilitate downhill drainage. Any necessary resurfacing of repurposed ranch road trails would follow the alignment that provides the best drainage, slope, and grade. The County's Trail Management Guidelines, Uniform Interjurisdictional Trail Design, Use, and Management Guidelines, Santa Clara Valley Water District Water Resources Protection Manual

⁵² County of Santa Clara. 2013. County of Santa Clara Ordinance Code Section B11-76 – Holding tanks; portable toilets. November 26.

⁵³ Santa Clara County Interjurisdictional Trails Committee. 1999. Uniform Interjurisdictional Trail Design, Use, and Management Guidelines. April 15.

⁵⁴ Santa Clara Valley Water District. 2014. Where our water comes from. Website: <https://www.valleywater.org/where-your-water-comes-from>. Accessed January 31, 2020.

⁵⁵ Amphion Environmental, Inc. and 2M Associates. 1993. Joseph D. Grant County Park Master Plan. July.

specify trail siting, construction, and maintenance considerations to reduce erosion or siltation to the maximum practicable extent.⁵⁶ **Less than significant impact.**

iii) The Master Plan Amendment includes installation of a backcountry toilet on a concrete pad, resulting in increased impervious surfaces in the Park. Implementation of BMPs through the Construction General Permit (CGP) Order 2009-0009-DWQ and compliance with NPDES permit conditions would reduce volume and rate of surface runoff from the site to the maximum practicable extent. Compliance with the County's two regional NPDES permits, Phase II NPDES Permit, and the Municipal Regional Permit (MRP), would allow stormwater runoff to be managed to protect local waterways during and after construction activities. **Less than significant impact.**

iv) The Master Plan Amendment would not place any structures which would impede or redirect flood flows. **Less than significant impact.**

- 4, 5. The Amendment area is not within a 100-year flood hazard area.⁵⁷ No structures would be placed within a 100-year flood hazard as part of the Amendment. **No impact.**
6. The Amendment area is not near a levee or dam. The closest dam is the Anderson Dam, approximately 11 miles south of the Amendment area. The Master Plan Amendment would not expose people or structures to significant risk of flooding from levee or dam failure. **No impact.**
- 7, 15. Receiving waters are natural bodies of water that receive wastewater or effluent. The Master Plan Amendment would not discharge any wastewater or effluent. **No impact.**
8. The Amendment area's watershed drains to Alameda County, and therefore is not within a County area of special water quality concern.⁵⁸ **No impact.**
9. The Master Plan Amendment would not result in the use of well water. **No impact.**
- 10, 11. The Master Plan Amendment would not result in a septic field being constructed. **No impact.**
12. County Parks has adopted the Santa Clara Valley Water Resources Protection Collaborative's Guidelines and Standards for Land Use near Streams and incorporated them into their policies. The Amendment area contains multiple creeks and would be required to conform to the County Parks policies on streams and/or creeks. As such, the Master Plan Amendment would not conflict with the Guidelines and Standards for Land Use near Streams. **Less than significant impact.**
13. The Amendment area is not connected to sewer lines and the Master Plan Amendment would not result in extensions of sewer trunk lines. **No impact.**
14. For all development projects in the County, the NPDES requires that stormwater runoff be managed to protect local waterbodies during and after construction. Specifically, stormwater discharge within the County is regulated by the regional Phase II NPDES Permit pursuant to the San Francisco Bay RWQCB. Furthermore, the County is required to operate under the MRP to

⁵⁶ Santa Clara County Interjurisdictional Trails Committee. 1999. Uniform Interjurisdictional Trail Design, Use, and Management Guidelines. April 15.

⁵⁷ Federal Emergency Management Agency (FEMA). FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search>. Accessed January 31, 2020.

⁵⁸ Santa Clara Valley Water District. 2020. Watersheds of Santa Clara Valley. Website: <https://www.valleywater.org/learning-center/watersheds-of-santa-clara-valley>. Accessed June 11, 2020.

regulate stormwater discharge throughout the County. The MRP (NPDES Permit No. CAS612008) mandates that permittees use their planning and development review authority to require that stormwater management measures be included in new and redevelopment projects to minimize and properly treat stormwater runoff. The erosion control measures identified would suffice for this project. Projects that disturb one or more acres of soil are required to obtain coverage under CGP Order 2009-0009-DWQ. It is estimated that less than 0.5 acres of soil would be disturbed for backpack camp implementation, and at least three linear acres would be disturbed for various trail improvements. CGP requirements include development of a SWPPP and installation and preservation of BMPs to protect water quality until the site is stabilized.

The following measures will be implemented during all phases of construction of the Project to prevent stormwater pollution and minimize potential sedimentation:

1. Earthmoving or other dust-producing activities shall be suspended during periods of high winds.
2. All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust as necessary.
3. Stockpiles of soil or other materials that can be blown by the wind shall be watered or covered.
4. All trucks hauling soil, sand, and other loose materials shall be covered and all trucks shall maintain at least two feet of freeboard.
5. All paved access roads, parking areas, staging areas and residential streets adjacent to the construction sites shall be inspected daily and swept when sediment is visible.
6. Vegetation in disturbed areas shall be replanted as quickly as possible.
7. All unpaved entrances to the site shall be filled with rock to remove mud from tires prior to entering County streets.

Compliance with regulatory permit conditions and implementation of erosion control measures would reduce impacts this project. **Less than significant impact.**

16. The Amendment area does not include a tributary to an impaired water body. **No impact.**
17. The Master Plan Amendment would not substantially change the direction, rate of flow, quantity, or quality of ground waters. The prefabricated backcountry toilet would meet requirements of the County Department of Environmental Health operating permit for a holding tank (the backcountry toilet), thus avoiding the possibility of groundwater contamination. **Less than significant impact.**
18. The Master Plan Amendment would not interfere with groundwater recharge or public groundwater supplies. **No impact.**
19. The Master Plan Amendment involves improvements in a small portion of the greater context of the Amendment area, including a wet trail crossing over Smith Creek in the Manzanita Trail Extension and a prefabricated bridge over Sulphur Creek in the Smith Creek Trail Extension. The Master Plan Amendment would be required to comply with applicable water quality laws and

regulations, including the Clean Water Act, Porter-Cologne Water Quality Control Act, and Santa Clara County On-site Wastewater System Ordinance. The County's Trail Management Guidelines, Interjurisdictional Trail Design Use and Management Guidelines, Santa Clara Valley Water District Water Resources Protection Manual specify trail siting, construction, and maintenance considerations to reduce erosion or siltation to the maximum practicable extent.⁵⁹ The wet crossing would follow mitigation requirements of the SCVHP, RWQCB permit, and Lake and Streambed Alteration Agreement. With implementation of these measures in addition to mitigation measure BIO-6, impacts would be less than significant. **Less than significant with mitigation.**

20. Flood Insurance Rate Map (FIRM) Number 06085C0285H indicates that the Amendment area is in a Zone D area, or an area of undetermined flood hazard.⁶⁰ A tsunami is an earthquake-induced wave that has potential to reach tens of feet along shorelines. The Master Plan Amendment area is not near sea level and is approximately 18.5 miles from the San Francisco Bay and 30 miles from the Pacific Ocean and is not susceptible to tsunamis. Seiches are oscillatory waves that occur in a closed body of water and are due to seismic activity; sufficient seismic activity could potentially cause a seiche in one of the County reservoirs. The nearest closed body of water is Grant Lake in the existing Park approximately three to five miles away. The Amendment area is higher in elevation than the nearest County Reservoir, Anderson Lake. Therefore, the Amendment area is not susceptible to a seiche. Mudflow potential is high in unstable hillsides with slopes greater than 15 percent, such as in portions of the Santa Cruz Mountains, Diablo Range, and most unincorporated areas of the County. As noted in Section G, Geology and Soils, portions of the Amendment area are vulnerable to landslides because of the natural terrain. However, the Master Plan Amendment would not exacerbate existing risk. In addition, the County retains authority to close the Park to visitors in the event of weather or seismic events that could cause an increased risk of landslide or mudflow. Therefore, Amendment operation would have a low risk of inundation and impacts would be less than significant. **Less than significant impact.**
21. As discussed, the Master Plan Amendment would protect water quality during construction and at operation. Additionally, the Master Plan Amendment would not provide potable water or non-potable water and would not substantially deplete groundwater resources or conflict with any plans, as the Amendment area does not lie within any water district's service area. **Less than significant impact.**

Mitigation: Implement BIO-6.

⁵⁹ Santa Clara County Interjurisdictional Trails Committee. 1999. Uniform Interjurisdictional Trail Design, Use, and Management Guidelines. April 15.

⁶⁰ Federal Emergency Management Agency (FEMA). FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search>. Accessed January 31, 2020.

K. Land Use and Planning						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 4
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,3,5,56
3. Conflict with general plan designation or zoning?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5, 7, 9a, 10a,
4. Conflict with special policies?						
a. San Martin and/or South County	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6, 10a, 44, 45
b. Los Gatos Specific Plan or Lexington Watershed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6, 10a, 13, 14
c. East Foothills Policy Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6, 10a
d. New Almaden Historic Area/Guadalupe Watershed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6, 7, 10a
e. Stanford	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6, 15, 16
f. San Jose	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	8, 10a
5. Be incompatible with existing land use in the vicinity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 12b,56

Discussion

The Amendment area is in unincorporated Santa Clara County, east of San José. The Amendment area is zoned AR and AR-sr and designated Ranchlands in the General Plan. However, County Parks acquired the Amendment area in 2012 as an expansion of the Park and is now considered part of a regional park.

Impact Analysis

- Physical division of an established community typically refers to construction of a linear feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local bridge that would impact mobility within an existing community or between a community and outlying area. The Master Plan Amendment does not involve any such features and would not remove any means of access or impact mobility. **No impact.**
- Grazing is an integral component of the vegetation management program within the Park and the Amendment area. Master Plan Amendment components would be consistent with the existing Park's designation and applicable General Plan policies discussed in Book B's Regional Parks and Public Open Space Lands section.⁶¹ **No impact.**

⁶¹ County of Santa Clara, Planning Office. 2008. Regional Parks and Scenic Highways Map Element of the Santa Clara County General Plan. June 26.

3. The Master Plan Amendment would not conflict with any applicable general plan designation (see Impact 2). Low-intensity recreation and preserving land in its “natural state” are permitted uses in the AR district, and the -sr overlay intends to preserve visual character of scenic roads (here being Mount Hamilton Road).⁶² Therefore, the Master Plan Amendment would not conflict with existing zoning. **Less than significant impact.**
4. The Master Plan Amendment would not occur in an area with special policies. **No impact.**
5. The Master Plan Amendment would not be incompatible with existing land uses as a regional park expansion into ranchlands purchased by County Parks in 2012. **No impact.**

Mitigation: None required.

⁶² County of Santa Clara. 2018. Santa Clara County Zoning Ordinance. May.

L. Mineral Resources						
	IMPACTS					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 19
2. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 5,
3. Result in substantial depletion of any non-renewable natural resource?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3

Discussion

The Surface Mining and Reclamation Act (SMARA) of 1975 is the principal State law regarding mineral resources. Given the economic value of mineral resources, SMARA limits development in areas that contain mineral resources with significant economic value. Furthermore, SMARA mandates State Geologists in accordance with the State Mining and Geology Board to designate land into Mineral Resource Zones, classified into categories based on both geological and economic data. There are no mineral recovery sites within a 10-mile radius of the Amendment area.⁶³

Impact Analysis

1. No mineral resource recovery sites exist in the Amendment area, and no mineral resources have been identified within the area.⁶⁴ Therefore, the Amendment would not result in loss of availability of a known mineral resource or a locally important mineral resource recovery site and there would be no associated impact. **No impact.**
2. The Santa Clara County General Plan EIR does not identify any mineral resource recovery sites within the Amendment Area.⁶⁵ No impact would occur. **No impact.**
3. The Amendment would not result in substantial depletion of any non-renewable natural resource as minimal amounts would be used as necessary to fuel construction equipment and operational maintenance equipment. **No impact.**

Mitigation: None required.

⁶³ California Department of Conservation. 2020. Mines Online. Website: <https://maps.conservation.ca.gov/mol/index.html>. Accessed February 3, 2020.

⁶⁴ State of California Division of Mines and Geology. 1983. Mineral Land Classification Map – Aggregate Resources Only: Santa Clara County. March 1.

⁶⁵ Planning Analysis and Development. 1994. Santa Clara County General Plan Draft Environmental Impact Report. September.

M. Noise						
WOULD THE AMENDMENT:	IMPACTS					SOURCE
	NO	YES				
		No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	
1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5,
2. Generate excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 37
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 31

Discussion

Noise is unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of sounds that we hear in the environment do not consist of a single frequency, but rather are a broad band of frequencies, each which differs in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The zero point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of three dB or less are only perceptible in laboratory environments. A change of three dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of five A-weighted decibel scale (dBA) is considered the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the dBA was derived to relate noise to the sensitivity of humans, it gives greater weight to frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for several sound level metrics, including the day/night sound level (L_{dn}), which represents how humans are more sensitive to sound at night. In addition, L_{max} is the maximum instantaneous noise level occurring over a sample period.

The County of Santa Clara regulates noise through the County Ordinance Code, Title B, Division B11, Chapter VIII - Control of Noise and Vibration. These standards provide restrictions designed to control unnecessary, excessive and annoying noise and vibration by all sources specified in the Chapter. It is the intent of Santa Clara County to maintain quiet in areas that exhibit low noise levels and to reduce noise levels in areas where noise levels are above noise standards.

The General Plan sets the satisfactory noise compatibility level for most land uses at less than 55 dBA L_{dn} . Satisfactory noise levels are those that pose no serious threat to the land use. The main strategy of the General Plan Safety and Noise Element is to prevent or minimize noise conflicts.⁶⁶ To achieve this strategy, the General Plan and Ordinance Code contain noise standards.

The General Plan defines the satisfactory noise compatibility level for park uses as up to 55 dBA L_{dn} ; environments with ambient noise levels above 55 dBA L_{dn} and up to 80 dBA L_{dn} are considered cautionary for new park or open space land use development. Cautionary noise levels are those which could potentially pose a threat to the proposed land use, and a project-specific analysis may be required to determine compatibility of the proposed land use.⁶⁷

Proposed improvements include expansion of existing trails, addition of new backpack camps and trails, and one backcountry toilet (Exhibit 3). Because the noisiest construction equipment is earthmoving equipment, the site preparation phase is expected to be the loudest phase of construction. This is expected to require use of dozers, front-end loaders, compactors, hydraulic backhoes, and haul trucks. Specifically, a SWECO 480 trail dozer and hand tools would be used to grade trails and make improvements. SWECO trail dozers are Tier III, 83 horsepower construction vehicles. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three or four minutes at lower power settings. Impact equipment such as pile drivers are not expected to be used during construction of Master Plan Amendment improvements.

There are no sensitive receptors in or near the Amendment area. Though there would be potential for single-event noise exposure causing intermittent noise nuisances from Master Plan Amendment construction activities, the effect on longer-term (hourly or daily) ambient noise levels would be small.

Impact Analysis

1. Short-term Construction Impacts

Two types of short-term noise impacts could occur during construction of facilities as part of the Master Plan Amendment. First, construction crew commutes and transport of construction equipment and materials would incrementally increase noise levels on Mount Hamilton Road and access roads leading to facility construction sites (vehicle engine noise, sound of vehicle doors shutting, etc.). Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. Construction will occur only within the hours allowed under the County's Noise Ordinance. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the Master Plan Amendment area would be less than significant.

The second type is related to noise generated during construction. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of noise generated and, therefore, noise levels surrounding the area as construction progresses. Despite variety in

⁶⁶ County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

⁶⁷ County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

the type and size of construction equipment, similarities in dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

The limited nature of construction required for implementation of the Master Plan Amendment precludes use of heavy construction equipment and trucks for extended periods of time. Operation of this equipment would be limited to repurposing ranch roads and installation of the backcountry toilet. The Master Plan Amendment is anticipated to be completed over an approximate nine-year period from 2020 to 2029 in four phases.

In addition, the following BMPs from the County's standards for noise reduction during construction are incorporated into the project description and would be followed during construction, which would further ensure that short-term construction noise impacts would be reduced to a less than significant level. The 10-year phasing of the Project would include planning, design and permitting. Construction activities would take place over the years in phases and would not be a continual 10-years of construction.

- The construction contractor shall ensure that all construction equipment have appropriate sound muffling devices, which are properly maintained and used at all times during operation.
- The construction contractor shall ensure that all internal combustion-engine-driven equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment.
- The construction contractor shall ensure that "quiet" models of air compressors and other stationary construction equipment are utilized where such technology exists.
- The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize distance between construction-related noise sources and noise-sensitive receptors nearest the Amendment area during all construction.
- The construction contractor shall prohibit unnecessary idling of internal combustion engines (i.e., more than five minutes).
- The construction contractor shall limit all noise producing construction activity to the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday.

Less than significant impact.

2. Long-term Operational Impacts

Primary sources of operational noise would be generated by Master Plan Amendment-related traffic and visitors using staging areas, backpack camps and trails of the Amendment area.

Master Plan Amendment development would result in expansion of recreational uses in the existing Park. However, the proposed uses are not substantial noise generators and park activities must comply with permissible hours of operation. Noise sources would be similar to existing operations and not exceed existing ambient noise levels.

The County does not define what constitutes a substantial permanent increase in ambient noise levels in the General Plan or Noise Ordinance. Therefore, for purposes of this analysis, a

substantial permanent increase in ambient noise levels is defined as (1) a noise level increase of five dBA or greater if resulting ambient noise levels are less than 55 dBA L_{dn} ; or (2) a noise level increase of three dBA or greater if resulting ambient noise levels are 55 dBA L_{dn} or greater. A doubling of acoustical energy would be necessary for existing noise levels to increase by three dBA, and a tripling of acoustical energy would be necessary for existing noise levels to increase by five dBA.

Traffic Volumes for 2017 conducted by Caltrans indicate that the AADT on Mount Hamilton Road was 400 vehicles at both Quimby Road and Kincaid Road, the traffic count locations nearest the Park entrance and the Amendment area, respectively.⁶⁸ Based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily. Approximately four weekly truck trips are expected. Master Plan Amendment implementation would not result in a doubling of traffic volumes along Mount Hamilton Road. Therefore, Master Plan Amendment-related traffic would not result in a substantial permanent increase in existing ambient noise levels in the Amendment area vicinity, and operational noise impacts would be less than significant. **Less than significant impact.**

3. Larger vehicles and equipment commonly associated with groundborne vibration would not be present, as heavy excavation and hauling activities would not be part of proposed Amendment developments. Therefore, project construction would not generate excessive groundborne vibration to potentially impact any structure in the project vicinity and impacts would be less than significant.

Upon construction completion, the Master Plan Amendment would not include any permanent sources of groundborne vibrations. As such, implementation of the Master Plan Amendment would not expose persons within the Plan vicinity to excessive groundborne vibration levels. **Less than significant impact.**

4. There are no private airstrips or public airport land use plans located near the Amendment area. Master Plan Amendment implementation would not expose park staff or visitors to excessive noise levels from airport activity. Therefore, no impacts associated with public or private airplane noise would occur. **No impact.**

Mitigation: None required.

⁶⁸ California Department of Transportation (Caltrans). 2017. 2017 Traffic Volumes: Route 118-133. Website: <https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-118-133>. Accessed February 25, 2020.

N. Population and Housing						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 4

Discussion

The Master Plan Amendment includes construction of two backpack camps, new trails and trail connections, installation of a backcountry toilet, improvements to the ranch road leading from Mount Hamilton Road to the Sulphur Springs Ranch Backpack Camp. The Master Plan Amendment does not include any new permanent dwelling units that would induce population growth.

Impact Analysis

- During the construction phase, workers would be drawn from the local labor pool and would not be expected to relocate to the Amendment area vicinity. Implementation of the Master Plan Amendment would allow for increased day use and provide for additional overnight camping. However, any increase to existing Park staff would be minimal. While the Master Plan Amendment could attract some new employees to nearby communities, implementation would not induce substantial direct or indirect population growth. **Less than significant impact.**
3. The Amendment area consists of ranchland already acquired by County Parks for the purpose of expanding the existing Park. The Park already provides for transient overnight stay at its campsites. No permanent housing is located within the Park. Therefore, Master Plan Amendment implementation would not displace any existing people or housing. **No impact.**

Mitigation: None required.

O. Public Services						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
		No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	
1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:						
i) Fire Protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
ii) Police Protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
iii) School facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
iv) Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
v) Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
2. Induce substantial growth or concentration of population? (Growth inducing?)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
3. Employ equipment which could interfere with existing communications or broadcast systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5

Discussion

Fire Protection Services

The Amendment area is located within a SRA. Fire protection service for the Amendment area is provided by CAL FIRE's Smith Creek Station located at 22805 Mount Hamilton Road between the existing Park and the Amendment area. The Amendment area does not lie within a local fire protection district. The CAL FIRE Smith Creek Station provides fire protection services and response during fire season when the station is staffed.⁶⁹ Furthermore, Park staff monitor facilities for fire danger and would enforce prohibition of campfires at the Amendment area campsites. Park ranger vehicles are equipped with fire suppression equipment and ranger staff are qualified to initiate wildfire suppression, if necessary, before CAL FIRE could arrive.

Police Protection Services

Police protection services for the County are provided by the Santa Clara County Sheriff's Department (SCCSD). The SCCSD coverage area includes the communities of Cupertino, Los Altos Hills, Saratoga, and unincorporated areas of the County. Moreover, the SCCSD provides a Parks Patrol unit for law enforcement within all County parks. The unit operates under the Headquarters Patrol Division, which is located approximately 15 miles west of the Amendment area at 55 West Younger Avenue in the City of San José.⁷⁰ Currently, the SCCSD command staff includes four major bureaus: administrative services, enforcement, custody, and support services. The Department has 2,025 employees, with 1,453 sworn law enforcement officers.⁷¹

⁶⁹ SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 13 – Unincorporated Areas without Local Fire Protection. August.

⁷⁰ County of Santa Clara Office of the Sheriff. 2020. Enforcement Operations. Website: <https://www.sccgov.org/sites/sheriff/pages/eo.aspx>. Accessed February 5, 2020.

⁷¹ County of Santa Clara Office of the Sheriff. 2019. The Sheriff's Office. Website: <https://www.sccgov.org/sites/sheriff/Pages/overview.aspx>. Accessed February 5, 2020.

Schools

The Santa Clara County Office of Education is responsible for educational services throughout the County. The County has outlined seven areas of responsibility based on geographic boundaries. The Amendment area is serviced by the Alum Rock Union Elementary and East Side Union High School Districts.⁷²

Parks

The County provides and maintains developed parkland and open spaces to serve its residents. County Parks is responsible for operation and maintenance of all County park facilities. County Parks includes 28 regional parks, which encompass over 52,000 acres of land.⁷³ The Amendment area is part of Joseph D. Grant County Park, but is currently closed to the public to ensure safety. The Amendment area will be opened to the public once a Phase of the project is implemented.

Libraries

Other public facilities within the County include eight libraries and one mobile library.⁷⁴ The closest library to the Amendment area is the Morgan Hill Library, approximately 14 miles to the south in the City of Morgan Hill.

Impact Analysis

1. (i) Given the use and size of proposed improvements, the Master Plan Amendment would not exceed the ability of fire responders to serve the area to such an extent that new or expanded facilities would be needed. **Less than significant impact.**
- (ii) Master Plan Amendment improvements would not increase the County residential population. Furthermore, parks are not a land use type typically associated with calls for police service, as compared to residential or retail land uses. As such, new or expanded facilities would not be needed. **Less than significant impact.**
- (iii) As mentioned, the Master Plan Amendment would not increase County population, including school children, and there would be no impact to schools. **No impact.**
- (iv) The Master Plan Amendment would not increase County population or decrease the amount of park space for its residents, and new recreational facilities would help ameliorate impacts to existing Park facilities. Therefore, impacts related to parks would be less than significant. **Less than significant impact.**
- (v) The Master Plan Amendment would not increase population. As such, the Master Plan Amendment would not increase use of existing library facilities within the County, especially considering the closest library is not immediately accessible via transportation from the Amendment area, and there would be no impact. **No impact.**
2. See Population and Housing Impact 1. **Less than significant impact.**
3. The Master Plan Amendment would not employ equipment which could interfere with existing communications systems. **No impact.**

⁷² Santa Clara County Office of Education. 2012. Trustee Areas. February 15.

⁷³ County of Santa Clara Parks and Recreation Department. 2020. About Us. Website: <https://www.sccgov.org/sites/parks/AboutUs/Pages/About-the-County-Regional-Parks.aspx>. Accessed February 5, 2020.

⁷⁴ Santa Clara County Library District. 2020. Find a Location. Website: <https://scll.bibliocommons.com/locations>. Accessed February 5, 2020.

Mitigation: None required.

P. Recreation						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	<u>No Impact</u>	<u>Less Than Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Potentially Significant Impact</u>	<u>Cumulative</u>	
1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 4, 5, 50
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 4, 5, 50
3. Be on, within or near a public or private park, wildlife reserve, or trail (includes those proposed for the future) or affect existing or future recreational opportunities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 4, 9d, 10h, 50
4. Result in loss of open space rated as high priority for acquisition in the "Preservation 20/20" report?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	38

Discussion

As discussed in Section O, Public Services, the County Parks operates 28 parks encompassing over 52,000 acres of land throughout the County. County Parks acquired the Amendment area in 2012. Under the Master Plan Amendment, the Amendment area would be opened to recreational uses including camping and hiking.

Impact Analysis

1. Implementation of the Master Plan Amendment would expand the existing Park and create additional recreational facilities. The Master Plan Amendment would include two backpack camps and associated trails. The Master Plan Amendment would not create new housing units or induce population growth, which would accelerate deterioration of existing parks or recreational facilities. While the Master Plan Amendment would encourage increased visitation and provide for additional camping opportunities, new recreational facilities would help alleviate impacts to existing Park facilities. **Less than significant impact.**
2. Implementation of the Master Plan Amendment would include construction of two backpack camps and new trails. The Project will increase camping and other recreational opportunities and include minor construction activity in an existing Park. The Project is located in an existing park and the proposed improvements will not have an adverse physical effect on the environment. Impacts on the environment from implementation are discussed throughout this document, and all impacts would be reduced to less than significant with the implementation of Mitigation Measures BIO-1 through BIO-7, CR-1, CR-2, CR-3 and GEO-1, BAAQMD Basic

Construction BMPs, SWPPP BMPS, and noise-related BMPs. **Less than significant impact with mitigation incorporated.**

3. The Amendment area is owned by County Parks and would expand the publicly accessible area of the Park and enhance recreational opportunities. **No impact.**
4. The Master Plan Amendment would not result in loss of open space. **No impact.**

Mitigation: Implement Mitigation Measures BIO-1 through BIO-7, CR-1, CR-2, CR-3, and GEO-1.

Q. Transportation/Traffic						
	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to intersections, streets, highways and freeway, pedestrian and bicycle paths and mass transit.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4, 26, 28, 43
2. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5
3. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2
4. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2,3, 5,
5. Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 5, 48, 56
6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	55,56
7. Not provide safe access, obstruct access to nearby uses or fail to provide for future street right of way?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2, 3, 30
8. Increase traffic hazards to pedestrians, bicyclists, and vehicles?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3, 4
9. Cause increases in demand for existing on or off-street parking because of inadequate project parking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 30
10. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2,4

Discussion

The Amendment area lies east of San José in the Western Diablo Range foothills. The only major roadway in the vicinity is Mount Hamilton Road (or State Route 130), a two-lane east-west highway

north of the Amendment area serving as its northeast boundary. Mount Hamilton Road ultimately connects to other State Routes and Interstates in San José to the east and to Interstate 5 near the City of Patterson in Stanislaus County to the west. Mount Hamilton Road runs through the entire existing Park and provides the only public entrance and exit besides Quimby Road to the west. Mount Hamilton Road is considered an evacuation route for the Park.⁷⁵ The Amendment area would be accessible from Mount Hamilton Road only by permitted maintenance and emergency vehicles, Park staff, and etc.; the access road is not to be used for vehicular public parking or access to proposed backpack camps and trail improvements.

Traffic Volumes for 2017 conducted by Caltrans indicate that the AADT on Mount Hamilton Road was 400 vehicles at both Quimby Road and Kincaid Road intersections, the traffic count locations nearest the Park entrance and the Amendment area, respectively.⁷⁶

Impact Analysis

- 1,6. The proposed Master Plan Amendment would expand and compliment the current network of recreation trails in the Park while allowing public access to areas formerly without trails. Short-term construction traffic would be nominal and primarily include County Parks trail crews. Construction activities associated with development of the backpack camps and trails would be expected to take place in four phases over nine years. This dispersed increase in traffic would not adversely affect number of net vehicle trips, volume to capacity ratio on roadways, congestion at intersections, or Level of Service (LOS) near the Amendment area.

Park visitors currently can park vehicles within the Park and at two trailhead staging areas along Mount Hamilton Road to access trails on foot. The proposed Master Plan Amendment involves developing multi-use trails, so an incremental increase in operational traffic near existing staging areas could be expected. The County estimates a maximum of approximately 1,350 additional campers annually at backpack camp buildout. Conservatively assuming each camper brings their own vehicle and campers are distributed throughout the year, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily. This increase is not substantial in relation to existing traffic load and capacity. The long-term incremental increase in traffic would not adversely affect number of net vehicle trips, volume to capacity ratio on roadways, congestion at intersections, or LOS in the Amendment area. Therefore, impacts would be less than significant. **Less than significant impact.**

2. The Amendment area does not lie within the Santa Clara Valley Transportation Authority's Congestion Management Plan roadway network, which generally covers the South Bay Area from the City of Palo Alto to the City of San José.⁷⁷ **No impact.**
3. Norman Y. Mineta San José International Airport is approximately 16 miles west of the Amendment area. Reid-Hillview airport is located approximately 20 miles from the Amendment

⁷⁵ SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 18 – County of Santa Clara Parks and Recreation Department. August.

⁷⁶ California Department of Transportation (Caltrans). 2017. 2017 Traffic Volumes: Route 118-133. Website: <https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-118-133>. Accessed February 25, 2020.

⁷⁷ Santa Clara Valley Transportation Authority. 2019. 2019 Congestion Management Program Document. November.

area. The Amendment area is not within its Airport Influence Area and would not affect air traffic patterns.⁷⁸ **No impact.**

4. The proposed backpack camps and trails would comply with all design and compatibility standards in the General Plan to ensure safe usage for all visitors.⁷⁹ The Master Plan Amendment would not involve modifications to existing roads in the Park or the surrounding area, and no public vehicular access would be allowed in the Amendment area. The existing ranch road from Mount Hamilton Road to the Sulphur Springs Ranch Backpack Camp would be improved to decrease hazards for use as a service and maintenance access road, including reducing the grade. Therefore, no impacts would occur. **No impact.**
5. Master Plan Amendment design does not include any elements that would impede emergency access to or from the Amendment area. Restricted vehicular access to the Sulphur Springs Ranch Backpack Camp would be provided from a gated ranch road extending from Mount Hamilton Road. Additional routes would be repurposed as access roads between the two backpack camps and along the existing southern segment of the Manzanita Trail. These access roads would provide emergency access to both camps and new trails. Park staff and other emergency officials could access trails on ATVs and UTVs. Additionally, trailheads would be subject to California Fire Code requirements, including provisions associated with minimum width and prohibition on parking (where necessary). As such, adequate emergency access would be provided. **Less than significant impact.**
7. The Master Plan Amendment would not modify existing roads in the surrounding area. Design of improvements would be subject to review by the Santa Clara County Fire Department and/ or CAL FIRE and the SCCSD to ensure compliance with applicable standards and regulations. **No impact.**
8. Hikers and bicyclists can access the existing Park by vehicle to use the Amendment area. The Master Plan Amendment would not conflict with continued use of existing Park hiking and biking facilities. While the improvements are anticipated to generate an increase in vehicle trips as discussed, the addition of three to four new average daily trips to the Park and its staging areas would not result in substantial deterioration in either performance or safety of existing traffic conditions. **Less than significant impact.**
9. Street parking is not available on Mount Hamilton Road. However, there are two trailhead staging areas along Mount Hamilton Road. It would be suggested that Amendment area visitors park at the existing Stockman's Group Picnic Area or Twin Gates Staging Area. The addition of three to four new average daily vehicles parking at the Park would not overwhelm existing parking capacity. **Less than significant impact.**
10. Vehicle miles traveled is the amount and distance of automobile travel attributable to a project. Hikers and bicyclists can access the existing Park by vehicle to use the Amendment area; the Park is not accessible via public transit. As a remote County park, it is likely that visitors would

⁷⁸ Windus, Walter B. 2016. Comprehensive Land Use Plan: Santa Clara County – Norman Y. Mineta San Jose International Airport. November 16.

⁷⁹ County of Santa Clara, Planning Office. 1994. Santa Clara County General Plan Book B. December 20.

have to travel a moderate distance to access the Amendment area from various parts of the County and greater San Francisco Bay Area.

Based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four vehicles to Mount Hamilton Road daily, or 25 vehicles per week on average. Approximately four weekly truck trips are expected for long-term maintenance.

Therefore, Park visitors and any potential truck trips would not add a significant proportion to existing traffic on Mount Hamilton Road and is not likely to affect vehicle miles travelled for the area. **Less than significant impact.**

Mitigation: None required.

R. Tribal Cultural Resources						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:						
1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 41, 42
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 41, 42

Discussion

FCS completed a Cultural and Paleontological Resources Constraints Analysis Technical Memorandum for the proposed Master Plan Amendment in November 2018 which is included as Appendix B.

On October 5, 2018, FCS staff conducted a records search at the NWIC that included the Amendment area and a 0.50-mile radius beyond Amendment boundaries. One prehistoric archaeological resource (P-43-000297) lies within 500 feet of the Amendment area. The archaeological site consists of a midden deposit with abundant amounts of angular rock fragments (probable heat affected rock), some groundstone artifact fragments, a few flakes of green chert, and is indicative of a habitation site. Two pedestrian surveys were conducted at the site by FCS Senior Archaeologist Dr. Dana DePietro on September 5, 2018 and May 21, 2020. Neither survey revealed additional resources, however lack of soil visibility and proximity to natural resources known to have been used by native peoples in the past were noted.

Impact Analysis

1. P-43-000297 is located outside of the Amendment area and would remain unaffected by the Master Plan Amendment. The proposed improvements, including new locations for backpack camping, installation of a backcountry toilet, and conversion of existing ranch roads for trails, involve ground disturbance and therefore have potential to have an adverse effect on undiscovered resources. Furthermore, the results of the NAHC Sacred Lands File search, proximity of a known prehistoric archaeological site, and natural resources used by native peoples in the past increases probability that additional resources may be found in the

Amendment area vicinity. However, implementation of Mitigation Measures CR-1 and CR-2 would ensure that this impact would be less than significant. **Less than significant with mitigation incorporated.**

2. On November 6, 2018, FCS received a response from the NAHC indicating that results from the Sacred Lands File search were positive for TCRs in proximity to the Amendment area. The letter included a list of seven Native American tribal representatives that the NAHC recommended contacting to determine tribal interest in the Amendment, as well as additional information on TCRs in the Amendment area vicinity. The Cultural and Paleontological Resources Constraints Analysis Technical Memorandum recommended the County, being the lead agency, engage in tribal consultation pursuant to the recommendations of the NAHC and AB-52. Letters were sent to these representatives on June 23, 2020 which included summary information regarding the project and its location.

During the 30-day period, one response was received from one of the tribal representatives (Amah Mutsun). The response stated that the tribal representative had examined the documents and had no specific information to add and that generally the sulfur springs were of special interest to Native peoples. No additional comments were received nor was consultation requested during the 30 day period, which ended on July 23, 2020.

As of this date, the County has not identified any significant TCRs pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.

Less than significant with mitigation incorporated.

Mitigation: Implement Mitigation Measures CR-1 and CR-2.

S. Utilities and Service Systems						
WOULD THE AMENDMENT:	IMPACT					SOURCE
	NO	YES				
	No Impact	Less Than Significant Impact	Less Than Significant with Mitigation Incorporated	Potentially Significant Impact	Cumulative	
1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5,
2. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1,2, 3, 5, 21, 56
3. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 56
4. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2,55,
5. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 5
6. Not be able to be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5
7. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	5

Discussion

The Park relies exclusively on two water wells located east of the Woodland Youth Group Camping area in the west side of the Park.⁸⁰ The proposed backcountry toilet at the Sulphur Springs Ranch Backpack Camp would be waterless, not require any utility extensions, and would be serviced by a private service company pumper truck. The Master Plan Amendment does not propose any potable water use or expansion.

Impact Analysis

- Under State and local regulations, all wastewater haulers in the area are required to obtain a permit from the County Department of Environmental Health. The permit requires yearly renewal and inspections of pumping vehicles. Waste must be disposed of by discharge to a

⁸⁰ Amphion Environmental, Inc. and 2M Associates. 1993. Joseph D. Grant County Park Master Plan. July.

publicly owned sewage treatment plant, or to a facility or location approved by the County Department of Environmental Health and the San Francisco Bay RWQCB. **Less than significant impact.**

- 2, 3. The Master Plan Amendment would not cause relocation or construction of utilities as the only development proposed are two backpack camps that would not provide potable water, sewer, or storm water connections. Under State and local regulations, all wastewater haulers in the area are required to obtain a permit from the County Department of Environmental Health. **Less than significant impact.**
4. The Master Plan Amendment does not propose any potable water use or expansion; therefore, it is reasonably expected that Amendment area visitors would use water refill stations in the main Park. However, Park visitors are also advised to pack in adequate water and campsite permits required for backpack camp use would make clear that potable water is not provided. Campers may also filter water from Smith Creek for potable use. Therefore, it is not expected that existing Park water supplies would be overwhelmed by additional Amendment area visitors. **Less than significant impact.**
5. The Master Plan Amendment proposes a single backcountry toilet that would not connect to a septic system. The toilet would have a 750-gallon vault which accommodates up to 13,000 uses between servicing by a private wastewater hauler. The service company would be required to maintain permits with the County allowing for disposal of waste at a local wastewater treatment plant, as described in Impact 1, 2, and 3. Permit compliance would forego any potential impacts to treatment plant capacity. **No impact.**
6. Short-term construction activities would produce some waste materials, although the Master Plan Amendment's waste disposal needs would not be substantial, as there would be no demolition of existing infrastructure. During long-term operational activity, trash receptacles would not be provided at backpack camps or along trails. Visitors would be required to pack out all waste as a condition of using camps and trails, therefore it is reasonably expected that Amendment area visitors would use waste receptacles in the main Park at staging areas or etc. This could increase solid waste generated in the Park. However, based on County estimates of increased visitation, the Master Plan Amendment would add approximately three to four daily campers, which would not have a significant impact on landfill capacity. **Less than significant impact.**
7. Solid waste generated during short-term construction activities, as well as that regularly collected during routine maintenance activities as part of long-term operational activities in the larger Park area, would be disposed of according to all federal, state, and local regulations. Therefore, impacts would be less than significant. **Less than significant impact.**

Mitigation: None required.

T. Wildfire						
If located in or near State Responsibility Areas or lands classified as very high FHSZs,	IMPACT					SOURCE
WOULD THE AMENDMENT:	NO	YES				
	<u>No Impact</u>	<u>Less Than Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Potentially Significant Impact</u>	<u>Cumulative</u>	
1. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5,
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 3, 5, 54, 55
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 2, 55
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1, 3, 5, 55

Discussion

The improvements proposed as part of the Master Plan Amendment would be in accordance with General Plan Policy GC-PR 12, “Parks and trails in remote areas, fire hazardous areas, and areas with inadequate access should be planned to provide the services or improvements necessary to provide for the safety and support of the public using the parks and to avoid negative impacts on the surrounding areas.”

According to CAL FIRE the Amendment area is located within a High Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area (SRA).⁸¹ County Parks standards and policies for wildfire prevention are listed below and would be implemented during all phases of construction and during operation of the Master Plan Amendment to control potential fire hazards:

- Comply with the Santa Clara County Parks Rangeland Management Policy.
- Smoking is prohibited in all Santa Clara County Parks.
- Campfires would not be allowed in the proposed Amendment Area.
- Operations staff routinely enforce all Park regulations.

⁸¹ California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Website: <https://egis.fire.ca.gov/FHSZ/>. Accessed January 31, 2020.

- County Parks implements a series of fire protection practices in its day-to-day operations such as the establishment of shaded fuel breaks along roads and trails and fuel management around developed sites and public use areas.
- County Parks Operations, Maintenance, and Natural Resource Management staff are trained in wildland fire suppression techniques.
- Temporarily closing trails when conditions become unsafe or environmental resources are severely impacted. Such conditions include soil erosion, flooding, fire hazard and environmental damage in accordance with General Plan C-PR 30.

County Parks also operates under a Memorandum of Understanding with CAL FIRE that requires staff to implement fire prevention practices (i.e., checking fire forecast conditions, monitoring weather, and having fire suppression equipment on-hand) to reduce chances of accidental ignition during vegetation maintenance operations. Under high fire danger conditions, all Parks maintenance activities with a risk of wildfire initiation are halted.

Impact Analysis

1. Restricted vehicular access to the Sulphur Springs Ranch Backpack Camp would be provided from a gated ranch road extending from Mount Hamilton Road. As part of the Master Plan Amendment, this road would be improved to include an 80-foot diameter turnaround at the road base, widen the road base to 12 feet, and reduce the grade in two sections. Additional routes would be repurposed as access roads between the two backpack camps and along the existing southern segment of the Manzanita Trail. These access roads would provide emergency access to both camps and new trails. Park staff and other emergency officials could access trails on ATVs and UTVs.

Several new trails are proposed in the Amendment area. Whether constructed new or repurposed from existing ranch roads, trails would be five feet in tread width to accommodate a standard four-wheel drive off-road vehicle or small tractor for staff to patrol the camps and provide emergency services. No public standard vehicular access would be provided in the Amendment area. Park visitors would be required to use existing parking areas in the Park to hike into the backpack camps and new trails via existing Park trails.

Mount Hamilton Road is considered an evacuation route for the Park.⁸² The Master Plan Amendment would not interfere with this route due to the minimal increase in daily park visitation. Further, the Master Plan Amendment would increase connectivity by providing nearly two miles of trails where none currently exist. While emergency response and evacuation capabilities are limited for the Amendment area, this is an existing condition and would not be exacerbated by the Master Plan Amendment. **Less than significant impact.**

2. The nearest Very High FHSZ in an SRA is approximately one-mile northeast of the Amendment area's northeast corner. Additionally, the Amendment area is within a County Wildland Urban Interface Fire Area.⁸³

⁸² SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 18 – County of Santa Clara Parks and Recreation Department. August.

⁸³ Santa Clara County Planning Office. 2009. Santa Clara County Wildland Urban Interface Fire Area. February 24.

CAL FIRE is responsible for unincorporated areas near the Park, including the Park itself. The CAL FIRE Smith Creek Fire Station lies just outside the western border of the Amendment area 22805 Mount Hamilton Road. This station is staffed during fire season.⁸⁴ Open fires and charcoal are prohibited for backpacking camps. Furthermore, Park staff monitor facilities for fire danger and would enforce prohibition of campfires at the Amendment area campsites. Park ranger vehicles are equipped with fire suppression equipment and ranger staff are qualified to initiate wildfire suppression, if necessary, before CAL FIRE could arrive. The County retains authority to evacuate and close the Park to visitors in the event of wildfire.

The Master Plan Amendment does not propose any use that would permit long-term occupants or residents. Camping permits are limited to 14 days. The only proposed development entails installation of two backpack camps and a backcountry toilet and trail improvements, none of which would increase visitors' inherent exposure to wildfire risk or exacerbate any natural risk factors. **Less than significant impact.**

3. The Master Plan Amendment proposes improvements to existing ranch roads for repurposing as access roads, including minimal grading, widening the road base leading from the gate at Mount Hamilton Road to 12 feet, and reducing the grade at this road in two sections. These improvements would not significantly impact fire risk or the environment. **Less than significant impact.**
4. The Master Plan Amendment proposes little development, minimizing opportunity to modify landscapes in such a way that would exacerbate risks. The backpack camps would be constructed on a gently sloping pad of compacted native soil to facilitate downhill drainage. Any necessary resurfacing of repurposed ranch road trails would follow the alignment that provides the best drainage, slope, and grade.

As noted in Section G, Geology and Soils, portions of the Amendment area are vulnerable to landslides because of the natural terrain. However, the Master Plan Amendment would not exacerbate existing risk. In addition, the County retains authority to close the Park to visitors in the event of wildfire or dangerous post-fire conditions. **Less than significant.**

Mitigation: None required.

⁸⁴ SWCA Environmental Consultants. 2016. Santa Clara County Community Wildfire Protection Plan: Annex 13 – Unincorporated Areas without Local Fire Protection. August.

U. Mandatory Findings of Significance		
WOULD THE AMENDMENT	NO	YES
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X, with mitigation	
b. Have the potential to achieve short-term environmental goals, to the disadvantage of long-term environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time, while long-term impacts will endure well into the future.)	X, with mitigation	
c. Have environmental impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects.)	X, with mitigation	
d. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	X, with mitigation	

- a) The Master Plan Amendment would involve implementation of a range of improvements mostly concentrated within the greater context of the Amendment area. Proposed improvement implementation would allow increased Park capacity for both day use and overnight visitors. Construction activities have potential to disturb migratory birds and other special-status species near improvements or to encounter yet undiscovered cultural and tribal cultural resources. Mitigation measure BIO-3 would reduce impacts to nesting birds and raptors protected under the MBTA to a less than significant level, BIO-4 would protect native trees, BIO-5 would limit spread and new infestations of invasive plant species, and BIO-1, -2, -6, and -7 would reduce potential for adverse effects on special-status and other aquatic species to a less than significant level. The presence of known cultural resource sites near the Amendment area requires mitigation to avoid accidental destruction or disturbance of undiscovered cultural resources, as well as human remains. Mitigation Measures CR-1, CR-2 and CR-3 would reduce potential impacts to less than significant levels. Therefore, with mitigation, the Master Plan Amendment would not degrade the quality of the environment or eliminate important examples of major periods of California history or prehistory. **Less than significant impact with mitigation incorporated.**
- b) This initial study has not identified any long-term environmental impacts that could result from implementation of the Master Plan Amendment. While the Master Plan Amendment would result in temporary, localized impacts related to construction noise, possible disturbance to nesting and breeding birds, or cultural resources, these potential impacts would be reduced to a less than significant level with implementation of Mitigation Measures BIO-1 through BIO-7, CR-1, CR-2, CR-3 and GEO-1, BAAQMD Basic Construction BMPs, SWPPP BMPs, and noise-related BMPs. Moreover, implementation of BMPs incorporated into the

Master Plan Amendment, including the County Parks' BMPs for prevention of plant pathogen introductions on County Park lands; construction site BMPs to reduce pollutants in storm water; BAAQMD Basic Construction BMPs would further minimize the potential for adverse effects resulting from implementation of the Master Plan Amendment. **Less than significant impact with mitigation incorporated.**

- c) The Master Plan Amendment would result in minimal, localized impacts related to construction noise, possible disturbance to nesting and breeding birds, or cultural resources. These potential impacts would be reduced to a less than significant level with implementation of Mitigation Measures BIO-1 through BIO-7, CR-1, CR-2, CR-3, and GEO-1, BAAQMD Basic Construction BMPs, SWPPP BMPs, and noise-related BMPs. As described throughout this initial study, the Master Plan Amendment would not exacerbate existing environmental impacts, therefore, with mitigation, the Master Plan Amendment's contribution to associated cumulative impacts would be less than significant. **Less than significant impact with mitigation incorporated.**
- d) The Master Plan Amendment involves improvements intended to facilitate and encourage recreational activities for County residents and visitors. Implementation of the Master Plan Amendment would result in minimal, localized impacts that would be reduced to a less than significant level with implementation of Mitigation Measures BIO-1 through BIO-7, CR-1, CR-2, CR-3, and GEO-1, BAAQMD Basic Construction BMPs, SWPPP BMPs, and noise-related BMPs. As such, compliance with applicable existing regulations would ensure the Master Plan Amendment would not result in substantial adverse effects on human beings. **Less than significant impact with mitigation incorporated.**

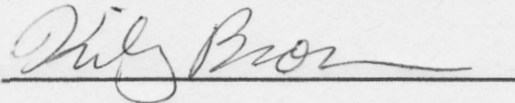
DISCUSSION OF ENVIRONMENTAL EVALUATION

Discuss on attached sheet(s) all “yes” answers and any “no” answers that are potentially controversial or require clarification. Describe any potential impacts and discuss possible mitigations. For source, refer to attached “Initial Study Source List.” When a source is used that is not listed on the form or an individual is contacted, that source and/or individual should be cited in the discussion.

DETERMINATION: (To be completed by the Lead Agency). On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation measures are included as part of the proposed project. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature



Date:

9/4/20

Print Name and Title

Kimberly Brosseau, Senior Planner

INITIAL STUDY SOURCE LIST

1. Field Inspection
2. Project Plans
3. Planner's Knowledge of Area
4. Experience with Other Project of This Size and Nature
5. County General Plan
6. The South County Joint Area Plan
7. County Zoning Regulations (Ordinance)
8. Second Amendment to Agreement [with San Jose] for Allocation of Tax Increment Funds
9. MAPS (various scales)
 - a. County Zoning (500' or 1,000')
 - b. ABAG "On Shaky Ground"-Santa Clara County Map Set (2 miles)
 - c. Barclay's Santa Clara County Locaide Street Atlas (2631')
 - d. County Regional Parks, Trails and Scenic Highways Map (10,000')
10. 5000' or one-mile Scale MAPS
 - a. County General Plan Land Use
 - b. Natural Habitat Areas
 - c. Relative Seismic Stability
 - d. Archaeological Resources
 - e. Water Resources and Water Problems
 - f. Viewshed and Scenic Road
 - g. Fire Hazard
 - h. Parks and Public Open Space
 - i. Heritage Resources
 - j. Slope Constraint
 - k. Serpentine soils
11. 2000' Scale MAPS
 - a. State of California, Special Studies Zones [Revised Official Map]
 - b. Water Problem/Resource
 - c. USGS Topo Quad (7-1/2 minutes)
 - d. Dept. of Fish and Wildlife, Natural Diversity Data Base Map Overlays and Textual Reports
 - e. Natural Resources [Key to map found in: Natural Resource Sensitivity Areas-Locality Data, Harvey and Stanley Associates-Contact County staff]
12. 1000' Scale MAPS/Air Photos
 - a. Geologic Hazards
 - b. Color Air Photos (MPSI)
 - c. Santa Clara valley Water District-Maps of Flood Control Facilities and Limits of 1 percent Flooding
 - d. Soils Overlay Air Photos
 - e. "Future Width Line" map set
13. County Lexington Basin Ordinance Relating to Sewage Disposal
14. Los Gatos Hillsides Specific Area Plan
15. Stanford University General Use Permit and Environmental Impact Report [EIR]
16. Stanford Protocol and Land Use Policy Agreement
17. County Geologist
18. Site Specific Geologic Report
19. State Department of Mines and Geology, Special Report #146
20. USDA, SCS, "Soils of Santa Clara County"
21. USDA, SCS, "Soil Survey of Eastern Santa Clara County"
22. County Environmental Health/Septic Tank Sewage Disposal System - Bulletin "A"
23. San Martin Water Quality Study
24. County Environmental Health Department Tests and Reports
25. Santa Clara County Heritage Resource (including Trees) Inventory [computer database]
26. Official County Road Book
27. County Transportation Agency
28. County Standards and Policies Manual (Vol. I - Land Development)
29. Public Works Departments of Individual Cities
30. County Off-street Parking Standards
31. ALUC Land Use Plan for Areas Surrounding Airports [1992 version]
32. County Fire Marshal
33. California Department of Forestry
34. BAAQMD Annual Summary of Contaminant Excesses and BAAQMD, "Air Quality and Urban Development-Guidelines for Assessing Impacts of Projects and Plans"
35. Architectural and Site Approval Committee Secretary
36. County Guidelines for Architecture and Site Approval
37. County Development Guidelines for Design Review
38. Open Space Preservation, Report of the Preservation 2020 Task Force, April 1987 (Chapter IV)
39. Riparian Inventory of Santa Clara County, Greenbelt Coalition, November 1988.
40. Section 21151.4 of California Public Resources Code.
41. Site Specific Archaeological Reconnaissance Report
42. State Archaeological Clearinghouse, Sonoma State University
43. Transportation Research Board, "Highway Capacity Manual," Special Report 209, 1985
44. Design Guidelines for Non-residential Development in San Martin.
45. Southwest San Martin Area Interim Development Guidelines
46. 2009 NPDES Storm Water Discharge Permit
47. 2002 Clean Water Act Section 303(d)
48. California Building Code (2007)
49. County of Santa Clara Ordinance Code
50. Santa Clara Countywide Trails Master Plan Update, November 1995
51. Santa Clara Valley Water District Water Resources Protection Collaborative Guidelines and Standards for Land Use Near Stream
52. Santa Clara Valley Habitat Conservation Plan
53. Phase I Environmental Site Assessment Update of Nolan Property, 2012
54. Uniform Interjurisdictional Trail Design, Use, and Management Guidelines.
55. Joseph D. Grant and Ed Levin Parks Resources Management Plan, 1996

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