



**VOLUME I:  
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT  
RESPONSES TO COMMENTS**

# **Integrated Pest Management Program**

State Clearinghouse No. 2019100325

**PREPARED FOR:**

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Final Program Environmental Impact Report  
for the  
Integrated Pest Management Program  
Volume I, Responses to Comments  
State Clearinghouse No. 2019100325

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July 2021

# TABLE OF CONTENTS

Section	Page
LIST OF ABBREVIATIONS .....	ii
<b>1 INTRODUCTION.....</b>	<b>1-1</b>
1.1 Summary of the IPM Program.....	1-1
1.2 Purpose and Intended Uses of this Final PEIR.....	1-1
1.3 Environmental Review Process .....	1-3
1.4 Summary of Revisions to the Draft PEIR .....	1-3
1.5 Organization of Volume I of the Final PEIR.....	1-4
<b>2 RESPONSES TO COMMENTS.....</b>	<b>2-1</b>
2.1 List of Commenters on the Draft PEIR .....	2-1
2.2 Comments and Responses.....	2-1
<b>3 REPORT PREPARERS.....</b>	<b>3-1</b>
<b>Figures</b>	
Figure 1-1 Santa Clara Valley Open Space Authority Preserves.....	1-2
<b>Tables</b>	
Table 2-1 List of Commenters.....	2-1
<b>Appendices</b>	
A Comment Letters Received on the Draft PEIR	
B Mitigation Monitoring and Reporting Program	
C Within-the-Scope Environmental Checklist	

# LIST OF ABBREVIATIONS

CEQA	California Environmental Quality Act
Final PEIR	final program environmental impact report
IPM	Integrated Pest Management
NOA	Notice of Availability

# 1 INTRODUCTION

The Santa Clara Valley Open Space Authority (Authority), as lead agency, prepared this final program environmental impact report (Final PEIR) in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). This Final PEIR presents public comments received on the Draft PEIR for the proposed Integrated Pest Management (IPM) Program, responses to those comments, and revisions to the Draft PEIR resulting from comments and minor project refinements initiated by Authority staff.

## 1.1 SUMMARY OF THE IPM PROGRAM

The IPM Program is proposed by the Authority to comprehensively direct pest management on 14 of the Authority's open space preserves (IPM Program Area) within Santa Clara County (refer to Figure 1-1) The proposed IPM Program describes comprehensive guidelines and procedures for the careful management of pests throughout the IPM Program Area while protecting natural resources and public health.

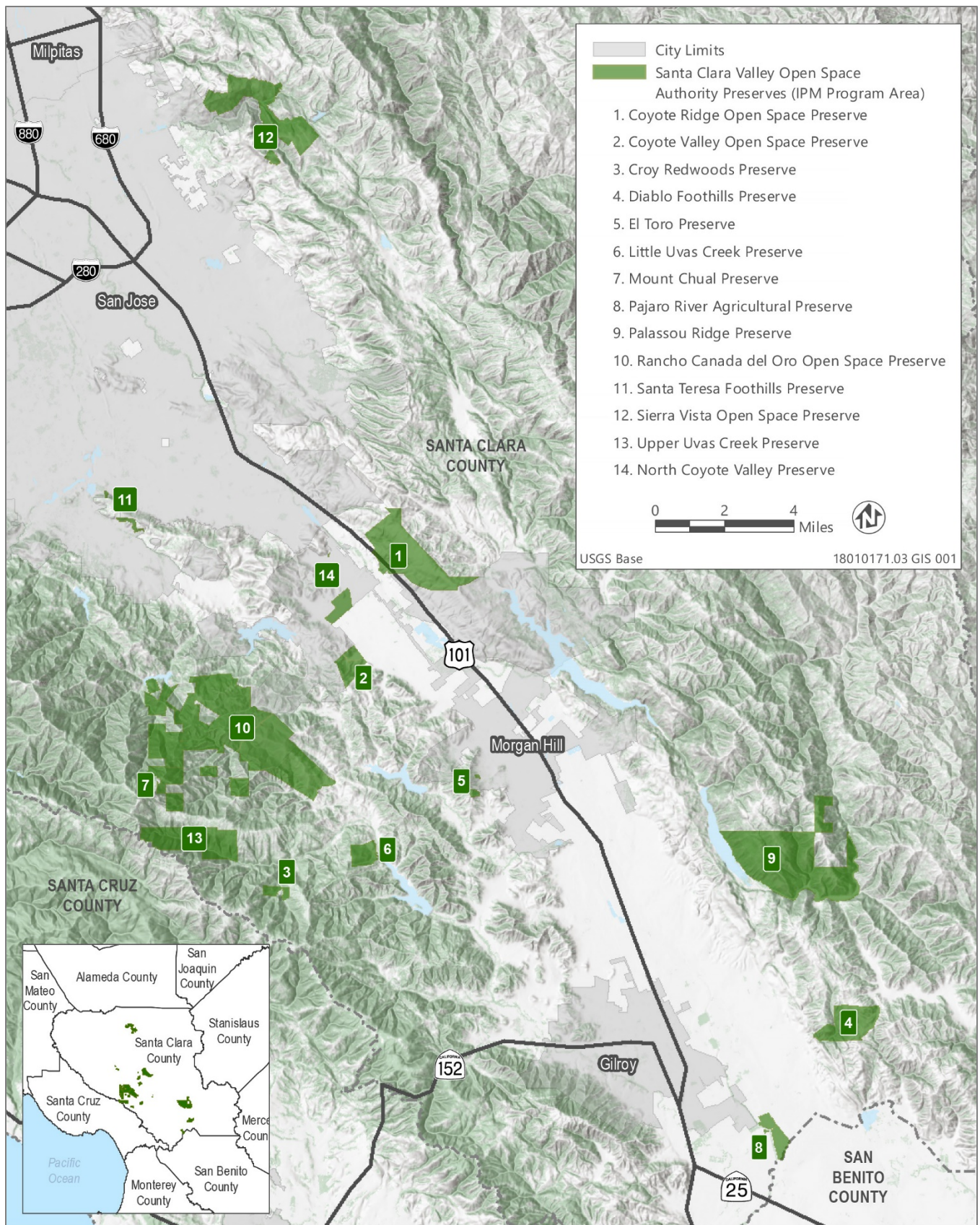
Currently, the Authority implements manual, mechanical, and chemical treatments for vegetation and animal pest management near roads and trails, recreational facilities, structures, and sensitive habitats. The IPM Program would expand upon the types, frequency, and geographic extent of existing IPM activities conducted by the Authority. Under the IPM Program, the Authority would increase the number of manual, mechanical, and chemical treatment projects occurring simultaneously. Specific treatment activities that would occur under the IPM Program include:

- ▶ **Manual Treatments:** prevention, sanitation, pulling, digging, hoeing, physical barriers/exclusion, covering/tarping, crop rotation, soil sterilization, mulching, weedmats, release of biocontrol insects, rodent burrow removal, trapping, giggering, shooting, and electrical currents.
- ▶ **Mechanical Treatments:** the use of motorized equipment for activities including mowing/cutting, cultivation, discing, girdling/frilling/drilling, and green flaming.
- ▶ **Chemical Treatments:** use of pesticides, including herbicides, insecticides, one rodenticide, and one fumigant. Herbicides would be applied through cut-stump, spray (by hand or via downward directed boom application from an all-terrain vehicle [ATV]), and wick application methods. Insecticide baits would be used in structures and buildings in tamper-proof bait stations and sprays would be used as a last resort and target specific individuals or populations (e.g., problem wasp nests). Rodenticides are not currently used by the Authority and would be used as a last resort to control pest infestations that create threats to human health or safety after other non-chemical treatment options are exhausted. Tenting and fumigation would also be used as a last resort to treat termite infestations within affected buildings and structures. The entire fumigation process, including the handling of the fumigant, would be implemented by a certified applicator.

## 1.2 PURPOSE AND INTENDED USES OF THIS FINAL PEIR

CEQA requires a lead agency that has prepared a Draft EIR to consult with and obtain comments from responsible and trustee agencies that have jurisdiction by law with respect to the project, and to provide the public with an opportunity to comment on the Draft EIR (State CEQA Guidelines Sections 15086 and 15087). The Final EIR is the mechanism for responding to comments that raise significant environmental issues. This Final PEIR for the proposed IPM Program comprises two volumes:

- ▶ **Volume I:** Includes all comments received on the Draft PEIR, responses to comments raising significant environmental issues, and a summary of revisions to the Draft PEIR resulting from comments and minor project refinements initiated by Authority staff.
- ▶ **Volume II:** Presents a complete reproduction of the Draft PEIR with text revisions made as a result of responses to comments received during the public review period or from staff refinements.



Source: Data received from SCVOSA in 2019 and 2021

**Figure 1-1 Santa Clara Valley Open Space Authority Preserves**

Sections 15088(a) and (c) of the State CEQA Guidelines state that the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare written responses to comments raising significant environmental issues. Responses are not required for comments regarding merits of the proposed project or issues not related to the project's environmental impacts. Several of the comments on the Draft PEIR provide suggestions for specific pest management activities to be considered in the IPM Program. Detailed responses are not warranted or required by CEQA for comments that do not address environmental issues related to the proposed IPM Program and whether they were properly covered by the Draft PEIR. Such instances are noted in the responses. The Authority will review all comments, including those that do not warrant a response under CEQA, before considering certification of the Final PEIR or approval of the proposed IPM Program.

## 1.3 ENVIRONMENTAL REVIEW PROCESS

Acting as lead agency under CEQA, the Authority distributed a Notice of Preparation (NOP) on October 17, 2019 to responsible agencies, trustee agencies, interested parties and organizations, and individuals that could have interest in the IPM Program. The NOP indicated that a Draft PEIR would be prepared and requested comments on its scope and contents. The NOP was available at the Authority's administrative office, located at 33 Las Colinas Lane in the City of San Jose, and online at [www.openspaceauthority.org/IPM](http://www.openspaceauthority.org/IPM). The Authority also held a public scoping meeting on October 29, 2019, to provide information on the proposed IPM Program and solicit public input on the scope and content of the PEIR. The scoping meeting was held at the Authority's administrative office. All comments on environmental issues received during the NOP public comment period and at the scoping meeting were considered and addressed during preparation of the analysis in the Draft PEIR.

On March 31, 2021, the Authority released the Draft PEIR for a 45-day public review and comment period. The Draft PEIR was submitted to the State Clearinghouse for distribution to reviewing agencies and was posted on the Authority's website (<https://www.openspaceauthority.org/IPM>). The Notice of Availability (NOA) of the Draft PEIR was published in the San Jose Mercury Newspaper, on the Authority's website, and a physical copy of the NOA was posted at the Authority's open space preserves that are open to the public (i.e., Coyote Valley, Rancho Canada del Oro, and Sierra Vista). A virtual public meeting was held on April 20, 2021 at 6:00 p.m. via Zoom Meeting due to the COVID-19 pandemic and restrictions placed on in-person gatherings to receive oral and written comments. The public meeting was recorded, and a copy of the video recording is available on the Authority's website (<https://www.openspaceauthority.org/IPM>).

Written comments on the Draft PEIR were received from one organization and one individual. Chapter 2, "Responses to Comments," identifies these commenting parties, presents their respective comments, and provides responses to these comments.

Before adopting the IPM Program and associated IPM Manual, the Authority as the lead agency is required to certify that the Final PEIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the PEIR, and that the PEIR reflects the independent judgment of the lead agency.

## 1.4 SUMMARY OF REVISIONS TO THE DRAFT PEIR

Volume II of this Final PEIR presents the Draft PEIR, as modified by responses to comments or minor project refinements. Changes in the text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added.

Comments that resulted in revisions to the PEIR primarily addressed IPM treatment methods for ground squirrels. The Authority incorporated several of the commenters' suggestions into the IPM Program, including the use of rodent burrow removal and trapping of squirrels and other rodents on agricultural lands. These methods were evaluated in the Draft PEIR in the structures and buildings management category. No new or substantially more severe impacts would occur as a result of the application of those IPM treatment methods to agricultural lands than what was evaluated in the Draft PEIR. No significance determinations changed as a result of the text modification, however, minor clarifications and additions to the Draft PEIR impact analysis and mitigation measures were included to account

for the use of these IPM treatment methods on agricultural lands, as well as around buildings and structures. Where a revision was warranted because of a comment, the revision is explained in detail in the applicable response to the comment that prompted the revision. None of the information added to the Final PEIR constitutes “significant new information” as defined by CEQA (State CEQA Guidelines Section 15088.5); therefore, recirculation of the Draft PEIR is not warranted.

The following Draft PEIR chapter, sections, and appendices contain text revisions. Refer to Volume II of this Final PEIR to review the text revisions to these elements of the Draft PEIR:

- ▶ Executive Summary
- ▶ Chapter 1, “Introduction”
- ▶ Chapter 2, “Program Description”
- ▶ Chapter 3, “Environmental Impacts and Mitigation Measures”
- ▶ Section 3.2, “Aesthetics”
- ▶ Section 3.3, “Biological Resources
- ▶ Section 3.5, “Hydrology and Water Quality”
- ▶ Section 3.6, “Cultural and Tribal Cultural Resources
- ▶ Chapter 4, “Cumulative Impact Analysis
- ▶ Appendix B, “Integrated Pest Management Guidance Manual”

## 1.5 ORGANIZATION OF VOLUME I OF THE FINAL PEIR

Volume I of this Final PEIR is organized as follows:

**Chapter 1, “Introduction,”** describes the purpose of the Final PEIR, summarizes the proposed IPM Program and the major conclusions of the Draft PEIR, provides an overview of the CEQA public review process, and describes the content of the Final PEIR.

**Chapter 2, “Comments and Responses to Comments on the Draft PEIR,”** contains a list of all parties who submitted comments on the Draft PEIR during the public review period, reproductions of all the comments received on the Draft PEIR, and written responses to the comments.

**Chapter 3, “List of Preparers,”** identifies the lead agency contacts as well as the preparers of this Final PEIR.



## 2 RESPONSES TO COMMENTS

This chapter contains comments received during the public review period for the Draft PEIR, which concluded on May 17, 2021. In conformance with Section 15088(a) of the State CEQA Guidelines, written responses were prepared addressing comments on significant environmental issues received from reviewers of the Draft PEIR.

### 2.1 LIST OF COMMENTERS ON THE DRAFT PEIR

Table 2-1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. Each comment letter is included in Appendix A of Volume I of this Final PEIR. Organizational comments are noted with the letter "O" in the comment numbering. Individual comments are noted with the letter "I" in the comment numbering.

**Table 2-1 List of Commenters**

Letter No.	Commenter	Date
<b>ORGANIZATIONS</b>		
O1	University of California Agriculture and Natural Resources, Santa Clara County Cooperative Extension	May 12, 2021
<b>INDIVIDUALS</b>		
I1	Sheila Berry	March 31, 2021

### 2.2 COMMENTS AND RESPONSES

The written comments received on the Draft PEIR and the responses to those comments are provided below. No oral or written comments were received at the virtual public meeting for the Draft PEIR.

#### 2.2.1 Organizations

##### **Letter O1 University of California Agriculture and Natural Resources, Santa Clara County Cooperative Extension**

Sheila Berry, Livestock and Natural Resources Advisor  
May 12, 2021

##### Comment O1-1

I appreciate the opportunity to provide feedback on the Authority's draft policy, guidelines and environmental review of an Integrated Pest Management program. The Authority has extensive experience in managing natural lands and the IPM information and policies are comprehensive and reflect this experience. The policies relative to agricultural lands are less developed and will require additional consideration to effectively support cultivated agricultural production, while protecting public and worker safety and minimizing negative impacts to the environment.

These comments cover two areas relative to the IPM guidelines and EIR on agricultural lands: ground squirrel control and the omission of IPM practices for agricultural lands.

##### Response O1-1

This commenter expresses that the IPM Program policies related to the management of agricultural lands are less developed than those for natural lands and require additional consideration to effectively support cultivated agricultural development, and indicates that additional comments will cover ground squirrel control methods and IPM practices on agricultural lands. No specific issues related to the analysis or conclusions in the Draft PEIR are

raised in this comment; therefore, no further response is warranted under CEQA (State CEQA Guidelines Section 15088). The comment will be provided in the record for consideration by decisionmakers.

#### **Comment O1-2**

While ground squirrels are a native and keystone species on natural lands, including rangelands in Santa Clara County, they are significant pests for agriculture. Appropriate control methods to manage ground squirrel populations within cultivated agricultural lands should be considered. There are several methods that should be part of an integrated management plan, but they are not discussed in this guidance document. Information on the UC ANR website addressing ground squirrel best management practices will be useful.  
<http://www.groundsquirrelbmp.com/>

#### **Response O1-2**

This commenter states that additional control methods to manage ground squirrel populations on agricultural lands should be considered for inclusion in the Authority's IPM Program. The commentor provides a link to best management practices for controlling ground squirrels on the University of California Agriculture and Natural Resources website. The comment raises general issue with the methods included in the IPM Manual and no specific issues related to the environmental analysis or conclusions in the Draft PEIR are raised; therefore, no further response is required. The Authority will consider the ground squirrel control methods included on the UC ANR website for inclusion in the IPM Program and refer to the responses to comments below regarding specific IPM treatment methods that have been added to the IPM Program for squirrel and rodent control on agricultural lands.

#### **Comment O1-3**

- Deep ripping of burrows is not an effective method to control squirrels in structures. It is most effective as a method to prevent reinvasion in fields after squirrel populations have been controlled with other methods.

#### **Response O1-3**

The commentor states that burrow ripping for ground squirrel management is not effective for controlling squirrels within structures, and that burrow ripping is most effective as a method to prevent reinvasion of squirrel populations in fields after other control methods have been implemented. Text has been added under "Ground Squirrels" in Section 2.8.3, "IPM in Buildings and Structures" of the PEIR to clarify that burrow ripping would occur in the vicinity of structures and buildings to prevent reinvasion by ground squirrels. Refer to Section 2.8.3, "IPM in Buildings and Structures" in Volume II of this Final PEIR for the revised text. The comment raises issues associated with the effectiveness of methods in the IPM Manual and no specific issues related to the environmental analysis or conclusions in the Draft PEIR are raised; therefore, no further response is required.

#### **Comment O1-4**

- The link to information on exclusion <http://icwdm.org/handbook/rodents/rodentexclusion.asp> is no longer found.
- The site [icwdm.org](http://icwdm.org) should not be referenced for ground squirrel control as ground squirrels are not a species that is covered by information on this website.

#### **Response O1-4**

This commentor indicates issues with links to websites provided in the IPM Manual. The comment raises issues with IPM Manual, and no specific issues related to the environmental analysis or conclusions in the Draft PEIR are raised, therefore, no further response is required. The Authority has reviewed the website issues identified by the commenter and updated the links included in the IPM Manual accordingly.

#### **Comment O1-5**

- Chemical control methods for rats should not be referenced as control methods for ground squirrels. Products that are legal for rat control may not be registered for ground squirrel control. Specifically, Cholecalciferol is NOT registered in California for ground squirrel control.

**Response O1-5**

The commenter states that the chemical control methods used for rats should not be used for ground squirrels. The commenter also states that Cholecalciferol is not registered in California for ground squirrel control. As described under "Chemical Treatments" in Section 2.7.1, "IPM Treatment Types," of the Draft PEIR, careful and judicious use of pesticides would be an essential component of the Authority's proposed IPM Program, in which the most effective, least toxic treatment options are used to control pests. Environmental Protection Measure (EPM) HAZ-5 would be implemented and requires that the Authority comply will all federal, State, and local pesticide use laws and regulations. For example, Authority staff will use application equipment and apply rates for the specific pest(s) identified on the pesticide label. Refer to Section 2.9, "Environmental Protection Measures" of the Draft PEIR for more information on the measures that would be implemented related to pesticide handling and application under the IPM Program. The specific mention of Cholecalciferol under "Ground Squirrels" in Section 2.8.3 "IPM in Buildings and Structures" of the Draft PEIR has been deleted as shown in Chapter 2, "Program Description," in Volume II of this Final PEIR.

**Comment O1-6**

- Trapping of ground squirrels in structures would be appropriate to remove squirrels. This could be followed by exclusion.
- Trapping of squirrels with multi-catch live traps can be effective to protect infrastructure and agricultural fields. For control in agricultural fields additional methods depending on the season are recommended. (Ground squirrel control measures on a public farmland site in the region has included the installation of raptor posts, live trapping, kill traps, Fumatoxin and carbon monoxide burrow treatments, burrow destruction, and burrow filling-burrow blocker. Despite all these efforts ground squirrel activity persists but with less damage to crops and farm infrastructure).

**Response O1-6**

The commenter provides several recommendations for squirrel control in structures and on agricultural lands. The commenter's suggestions have been included in the proposed IPM treatments. The Authority has incorporated live trapping of ground squirrels in buildings and structures followed by exclusion as a method of ground squirrel control to the IPM Manual, as well as trapping and burrow removal on agricultural lands. Refer to Section 2.8, "Specific IPM Treatments by Management Category," in Volume II of this Final PEIR to review the new text that has been added to the PEIR related to ground squirrel control.

**Comment O1-7**

- Considerations for worker safety and legal methods to kill ground squirrels caught in live traps should be considered. Last year live trapping captured over 1000 ground squirrels in one season on one site.

**Response O1-7**

The commenter states that worker safety and legal methods for killing ground squirrels caught in live traps should be considered. The Authority will consider worker safety and legal methods for elimination with respect to ground squirrels that are caught in live traps for inclusion in the IPM Program. No specific issues related to the environmental analysis or conclusions in the Draft PEIR are presented and no further response is required.

**Comment O1-8**

Table 2.2: Cholecalciferol should not be listed for use on vertebrate pests except for the specific pest listed on the product label.

**Response O1-8**

The commentor states that Cholecalciferol should only be used on the specific pests included on the product label. As described in response to comment O1-5 above, the Authority would comply with all federal, state, and local laws regarding pesticide handling and use. The Authority would not use any pesticides on pests that are not specifically listed on the pesticide label. The specific mention of Cholecalciferol under "Ground Squirrels" in Section 2.8.3 "IPM in

Buildings and Structures” of the Draft PEIR has been deleted as shown in Chapter 2, “Program Description,” in Volume II of this Final PEIR.

#### **Comment O1-9**

Although it is clearly stated that IPM guidance document and EIR do not cover the myriad of pests that should be addressed with IPM on agricultural lands (cultivated, non-grazing lands), the inclusion of a couple treatment options is misleading. It is not clear why cultural and mechanical methods are discussed but not biological control methods, for example. Table 2.2 in the EIR suggests that controlling pests on agricultural lands is limited to mechanical and manual control. Even organic production uses pesticides to control pests. It is also not reasonable to assume that animal pests (vertebrate and invertebrate) can be controlled with only prevention (Table 2.2). In acquiring new agriculture properties previous pest control measures should be recognized as they will help to identify the scope and nature of potential pest problems. All control options as discussed on page 66 with the addition of biological control should be included in the EIR.

#### **Response O1-9**

This commenter raises concerns over which treatment options are included in the IPM Program and evaluated in the Draft PEIR. As described in Section 2.8.2, “IPM for Agricultural Lands”, of the Draft PEIR, the Authority manages one agricultural preserve with row crops, the Pajaro River Agricultural Preserve. If the Authority obtained additional agricultural preserves, the site-specific management needs of those agricultural preserves would be determined by lessees and the Authority in individual Agricultural Management Plans based on an assessment of farm and field conditions, type of crops, and anticipated crop yields.

As described under “Manual Treatments” in Section 2.7.1, “IPM Treatment Types” in the Draft PEIR, manual control treatments that are evaluated in the PEIR include prevention, sanitation, pulling, digging, hoeing, physical barriers/exclusion, covering/tarping, crop rotation, soil sterilization, mulching, weedmats, release of biocontrol insects, trapping, gassing, shooting, and electrical currents. Some of these actions have limited physical environmental disturbances compared to the more active pulling, digging, and use of electrical currents (e.g., prevention [installing educational signs], and sanitation [picking up trash and crumbs]) and are not discussed in detail. In addition, chemical control options (e.g., pesticide use) and cultural control options (e.g., covering/tarping, crop rotation, and soil sterilization) would be covered by site-specific agricultural management plans and implemented by the agricultural tenant; therefore, these methods are not described or evaluated in this PEIR. Refer to Chapter 3 through 7 of the IPM Manual for a full description of the manual treatments proposed under the IPM Program.

The Draft PEIR analyzes the potential environmental impacts associated with manual and mechanical treatment options for pests on agricultural lands including pulling, mulching, hoeing, weedmats, mowing, green flaming, discing, and cultivation. In addition, as described in response to comment O1-6, the Authority has incorporated rodent trapping and burrow destruction on agricultural lands as a method of ground squirrel control to the IPM Program. Refer to Section 2.8, “Specific IPM Treatments by Management Category,” in Volume II of this Final PEIR to review the new text that has been added to the IPM Program related to ground squirrel control. These methods have been evaluated for environmental effects in the PEIR; refer to the analyses contained in Chapter 3 in Volume II of this Final PEIR.

If additional control methods not analyzed in the Draft PEIR are determined to be necessary to control agricultural pests, as defined in the individual Agricultural Management Plan developed for that agricultural preserve, additional environmental review may be necessary and would be conducted at that time.

#### **Comment O1-10**

Best practices for controlling vertebrate pests including the control of ground squirrels and gophers in and around farm fields should be considered. Unlike insect pests and pathogens, vertebrate pests are not crop specific. Rodents are noted as a pest to be controlled on page 66, Table 16 but none of the cultural or physical options appear to be relevant to their control. Control of invertebrate pests is also essential to meet U.S. Food and Drug Administration’s Food Safety Modernization Act food safety standards.

**Response O1-10**

The commenter states that best practices to control ground squirrels and gophers in and around farm fields should be considered for inclusion in the IPM Program and that control of invertebrate pests is essential. Refer to the response to comments O1-6 and O1-9 regarding the additional pest management strategies that have been added to the IPM Program to address rodent-type pests on how the Authority will address additional IPM methods deemed necessary on agricultural preserves in the future.

**Comment O1-11**

Further development of an IPM plan is essential if the Authority intends to acquire agricultural lands and support sustainable agricultural production. This draft policy, guidelines and environmental review by the Authority of an Integrated Pest Management program is a positive and effective step towards a fully developed and comprehensive plan to effectively manage agricultural lands and cultivated agricultural production.

**Response O1-11**

The commenter states that further development of the IPM Program is needed to effectively manage agricultural lands and cultivated agricultural development. As described in Section 2.1, "Integrated Pest Management Program Overview" in the Draft PEIR, the IPM Program approach incorporates an adaptive framework designed to achieve the Authority's land management goals over time by providing opportunities to integrate newly developed scientific techniques and the lessons learned from monitoring treatments over time. An annual IPM Program Report would be developed at the end of each year to summarize the IPM Program work completed in the previous year, evaluate the IPM Program's progress in meeting overall goals by monitoring the effectiveness of treatments, and would include any recommended modifications to the IPM Program to be included the following year, which would facilitate adaptive management of the program. As new IPM treatment methods are developed, the Authority will amend the IPM Manual and prepare appropriate subsequent or supplemental environmental documents, as needed.

## 2.2.2 Individuals

**Letter I1 Sheila Berry, Livestock and Natural Resources Advisor**

March 31, 2021

**Comment I1-1**

I will provide written comments to the Authority's IPM program but I wanted to share some information about ground squirrel control. The prevention and control strategies presented do not seem adequate for agricultural lands (non-rangeland) where squirrels are a pest. If the authority intends to acquire and manage more farmland a broader discussion and consideration of ground squirrel control is important.

**Response I1-1**

The commentor states that the prevention and control strategies presented in the IPM Program are not adequate for agricultural lands where ground squirrels are pests. Refer to the response to comments O1-6 and O1-9 regarding the additional pest management strategies that have been added to the IPM Program to address rodent-type pests on agricultural lands and why some control methods are not included in the Draft PEIR. The comment does not raise specific issues related to the environmental analysis or conclusions in the Draft PEIR, therefore, no further response is required.

**Comment I1-2**

UC IPM has this ground squirrel bmp website that covers possible control strategies.

<http://www.groundsquirrelbmp.com>. These control strategies include non-chemical control with gas or smoke bombs for example. Santa Clara County Parks at their farm park (martial Cottle Park) is using the cheetah (CO) and. Burrow blocker (sand slurry). I believe the city of San Jose has a CO2 machine to treat burrows. UCCE also controls squirrels in the county's farm park. This summer we trapped and euthanized (CO2) 900 + ground squirrels on 4 acres. We just

completed 3 fumigation treatments on the same 4 acres plus 7 acres, treating over 1200 burrows. It is hard to fathom the magnitude of the problem on farmland. Before earnest control efforts, the veteran farmer lost all of his watermelon seedlings and Jacob's farm lost 70% of their vegetable crops.

**Response I1-2**

The commentor provides a link to the best management practices for controlling ground squirrels on the University of California Agriculture and Natural Resources website and provides additional control strategies for managing ground squirrels that are currently not proposed within the IPM Program. The comment does not raise specific issues related to the environmental analysis or conclusions in the Draft PEIR, therefore, no further response is required.

**Comment I1-3**

Deep ripping is not feasible (requires a big tractor) and would not provide much in the way of population control.

**Response I1-3**

The commentor states that the habitat modification strategy of deep ripping of old burrows is not feasible because it requires a tractor and does not effectively control ground squirrel populations. Refer to response to comment O1-3 above regarding burrow ripping and its use to prevent reinvasion of ground squirrels and other rodents in old burrows. The comment addresses issues with strategies for controlling ground squirrels, and no specific issues related to the environmental analysis or conclusions in the Draft PEIR are raised; therefore, no further response is required.

**Comment I1-4**

I realize that the authority has not needed to consider controlling ground squirrels on Preserve lands but agricultural lands where squirrel food is essentially planted requires a consistent control effort. I am not sure how your review process works but I thought you may want to consider public review of additional strategies for ground squirrel control that could be used on agricultural lands where you intend for crops to grow.

**Response I1-4**

The commentor states that managing ground squirrels on agricultural land requires a consistent effort and references the strategies for ground squirrel control provided in earlier comments. Refer to the response to comments O1-6 and O1-9 regarding the additional pest management strategies that have been added to the IPM Program and are evaluated in the Final PEIR to address rodent-type pests (e.g., squirrels) on agricultural lands, why some control methods are not included in the Draft PEIR, and the process for developing effective treatment methods on newly agricultural lands. The comment does not raise specific issues related to the environmental analysis or conclusions in the Draft PEIR, therefore, no further response is required.

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