Construction practices are incorporated into the implementation of the Coyote Canyon Natural Resources Management (NRM) Plan & Interim Access (IA) Plan (Project) to ensure that Project-related effects are minimized or avoided. Successful implementation of these practices would ensure that minimization of air quality, biological, noise and cultural resource impacts. These will include implementation of the Department’s measures for the prevention of plant pathogen introductions on County parkland; wildfire prevention; construction site practices during construction activities to reduce pollutants in storm water discharges; standard County dust-reduction practices; standard County noise reduction practices; and the San Francisco Bay Area Air Quality Management District (BAAQMD) Basic Construction practices to prevent stormwater pollution and minimize potential sedimentation.

California Department of Fish and Wildlife Lake and Streambed Alteration Agreement
There are several smaller perennial and intermittent streams and drainages throughout the Property. The trail alignment identified under the Project could pass through streams and riparian habitat under the jurisdiction of the California Department of Fish and Wildlife. The trail alignment was designed to avoid streams to the maximum extent practicable to preserve natural resources and reduce future maintenance requirements. Stream crossings would consist primarily of rock fords but could include culverts or bridges depending on the steepness of stream banks or persistent stream flow.

For watercourses, a Lake and Streambed Alteration Agreement would be obtained prior to construction. Compliance with conditions of the Lake and Streambed Alteration Agreement and Habitat Plan would result in less than significant impacts to riparian areas.

County Parks Wildfire Prevention Measures
The County of Santa Clara Parks & Recreation Department (Department) is an active participant in various wildfire prevention measures including the Santa Clara County Fire Department’s Community Wildfire Protection Plan (CWPP) program (http://www.sccfd.org/santa-clara-county-community-wildfire-protection-plan). The Department also operates under a Memorandum of Understanding (MOU) with CALFIRE that requires Department staff to implement fire prevention practices (i.e., checking fire forecast conditions, monitoring weather, and having fire suppression equipment on-
hand) to reduce the chance of accidental ignition during vegetation maintenance operations. Under high fire danger conditions, all activities with a risk of wildfire initiation are halted. According to the California Department of Forestry and Fire Protection (CAL FIRE) the Property is located within the State Responsibility Area (SRA) high fire hazard severity zone and falls under such SRA standards.

The Department standards and policies for wildfire prevention are listed below and will be implemented during all phases of construction of the Project as well as implementation of the Project to control potential fire hazards. Compliance with State and Local regulations, including the California Fire Code and implementation of the County’s own fire risk reduction standards and practices would minimize wildfire risks at the site.

- The Property is required to comply with the Santa Clara County Parks Rangeland Management Policy.
- Smoking is prohibited in all Santa Clara County Parks.
- Shoreline fires are not allowed at Anderson Lake County Park.
- Operations staff routinely enforce all Park regulations.
- The Department 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.
- Fires are only allowed in designated picnic areas or fire rings (none are proposed for the Coyote Canyon IA Plan) and those areas have fuel treatment plans that include shaded-fuel breaks, mowing, bare soil scraping around barbeques.
- Department Operations, Maintenance, and Natural Resource Management staff are trained in wildland fire suppression techniques.
- The County is authorized to evacuate and close Coyote Canyon in the event of threat or occurrence of wildfire.
- 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 the Santa Clara County General Plan C-PR 30.

The IA Plan proposes the conversion, construction, and maintenance of single-track and double-track trails for hiking, equestrian, bicycling, and dogs-on-leash uses. Although the Project would increase the number of visitors to the site, it does not include any campsites, picnic areas, barbeque areas, or construction of new structures. Existing
structures will be monitored for structural integrity and safety concerns and may be removed if necessary.

Prevention Measures for Plant Pathogen Introductions on County Parkland

Prevention measures of plant pathogen introductions will be incorporated where applicable within the Coyote Canyon Property. These practices encompass both protection of the residual stand from mechanical damage, and quarantine and sanitation practices. Proactive management to restore forest resilience is important. As part of the Coyote Canyon Natural Resource Management Plan & Interim Access Plan to following measures will be implemented:

- If possible, do not work in pathogen infested areas during wet, rainy, and cool times of the year and avoid working in muddy conditions.

- While grazing the Property, minimize the spread of invasive plants and pathogens through the use of quarantine periods, holding areas, clean stock water, and personnel, equipment and vehicle sanitation.

- 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 Commissions or CAL FIRE for recommendations on safe removal and transport.
Santa Clara Valley Habitat Plan

The Santa Clara Valley Habitat Plan (Habitat Plan) is both a habitat and natural community conservation plan. The regional partnership is between six local partners, including Santa Clara County, Santa Clara Valley Transportation Authority, Santa Clara Valley Water District, and the cities of San Jose, Gilroy, and Morgan Hill; with permits issued by the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. In 2013, all local partners adopted the Habitat Plan.

The Project is considered a “covered activity” under the Habitat Plan. Potential permanent and temporary impacts to watercourses would be addressed through the Santa Clara Valley Habitat Plan (Habitat Plan). Compliance with conditions of the Lake and Streambed Alteration Agreement and Habitat Plan would result in less than significant impacts to riparian areas.

The Habitat Plan is available online [https://scv-habitatagency.org/178/Santa-Clara-Valley-Habitat-Plan](https://scv-habitatagency.org/178/Santa-Clara-Valley-Habitat-Plan)

San Francisco Bay Area Air Quality Management District Measures

Following approval of the Plan and CEQA document, it is anticipated that the proposed trails will be constructed by the County Parks Trails Crew. Trail construction would be intermittent and temporary, occurring during dry periods where possible, likely from April to October, to reduce the impacts on soil, habitat, and sensitive species. Short-term GHG emissions generated during the six-month construction period would consist primarily of heavy equipment exhaust, worker travel, and materials delivery.

Construction activities such as grading operations, construction vehicle traffic, and wind blowing over exposed earth would generate exhaust emissions and fugitive particulate matter emissions, temporarily affecting local air quality. The following measures will be implemented during all phases of construction of the Plan to control dust and exhaust at the Property:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be swept when visible.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
• 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 CCR Title 13, Section 2485). Clear signage shall be provided for construction workers at all access points.

• 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.

San Francisco Bay Area Regional Water Quality Control Board: Clean Water Section 401 Water Quality Certification and/or Waste Discharge Requirements pursuant to the Porter-Cologne Water Quality Act

Under the Clean Water Act (CWA), an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the United States must provide the federal agency with a Section 401 certification. The certification, made by the state in which the discharge originates, declares that the discharge will comply with applicable provisions of the act, including water quality standards. A state's water quality standards specify the designated use of a stream or lake (e.g., for water supply or recreation), pollutant limits necessary to protect the designated use (in the form of numeric or narrative criteria), and policies to ensure that existing water uses will not be degraded by pollutant discharges.

The Section 401 program is administered by the California State Water Resources Control Board and, for Santa Clara County, the San Francisco Bay Area Regional Water Quality Control Board (Regional Water Board). If Plan implementation occurs in any waters of the United States, then a CWA Section 404 permit will be required from the Corps. CWA Section 404 permits require a CWA Section 401 water quality certification from the Regional Water Board.

The Regional Water Board considers all perennial, seasonal, and intermittent streams to be waters of the State, subject to Water Board jurisdiction. If work is proposed in a stream that is subject to Water Board jurisdiction, but not regulated by the Corps, then Waste Discharge Requirements, issued pursuant to the authority of the State of California's Porter-Cologne Water Quality Act, must be received from the Regional Water Board prior to Plan implementation.
San Francisco Bay Area Regional Water Quality Control Board: General Permit for Discharges of Stormwater Associated with Construction Activity/National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities

Implementation of the Plan would disturb more than one acre of land and, therefore, would require a NPDES permit. The NPDES program is a federal permit program under the Clean Water Act that is administered by the San Francisco Bay Area Regional Water Quality Control Board (RWQCB). This permit requires the installation and preservation of measures to protect water quality until the site is stabilized. The following measures will be implemented during all phases of construction of the Proposed Project to prevent stormwater pollution and minimize potential sedimentation:

- Earthmoving or other dust-producing activities shall be suspended during periods of high winds.
- All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust as necessary.
- Stockpiles of soil or other materials that can be blown by the wind shall be watered or covered.
- All trucks hauling soil, sand, and other loose materials shall be covered and all trucks shall maintain at least two feet of freeboard.
- 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.
- Vegetation in disturbed areas shall be replanted as quickly as possible.
- All unpaved entrances to the site shall be filled with rock to remove mud from tires prior to entering County streets.

United States Army Corps of Engineers: Clean Water Act Section 404 Permit

Section 404 of the Clean Water Act (CWA) establishes a program to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Activities in waters of the United States regulated under this program include fill for development, water resource projects (such as dams and levees), infrastructure development (such as highways and airports) and mining projects. Section 404 requires a permit before dredged or fill material may be discharged into waters of the United States.
Proposed activities are regulated through a permit review process. An individual permit is required for potentially significant impacts. For most discharges that will have only minimal adverse effects, a general permit may be suitable. General permits are issued on a nationwide, regional, or state basis for particular categories of activities. The general permit process eliminates individual review and allows certain activities to proceed with little or no delay, provided that the general or specific conditions for the general permit are met.

The Property may contain riparian habitat, waterways, and wetlands considered to be “waters of the United States”. Waters of the United States include traditional navigable waters, interstate waters, territorial seas, and impoundments of jurisdictional waters, as well as any tributaries to waters of the United States. The Department will consult with the U.S. Army Corps of Engineers through the Section 404 process for any waters of the United States that may be impacted by the Plan.