COSCA Open Space Invasive Plant Management Plan

Draft Initial Study – Programmatic Mitigated Negative Declaration

Prepared by

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Initial Study

Project Title

COSCA Open Space Invasive Plant Management Plan (IPMP)

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Project Location

The COSCA Open Space Invasive Plant Management Plan (Project) encompasses all Conejo Open Space Conservation Agency (COSCA) owned and managed land within the boundaries of the City of Thousand Oaks (City) and the Conejo Recreation and Park District (CRPD) as well as three CRPD urban parks containing natural areas impacted by invasive species. The Project area covers approximately 13,000 acres. The City and CRPD are located in the Conejo Valley, in Ventura County, California (Figure 1).

General Plan Designation

The land comprising the Project area is designated as Existing Parks, Golf Courses, Open Space (City of Thousand Oaks 2024).

Zoning

The land within the Project area is zoned primarily as Open Space (OS). However, some parcels still carry historic zoning designations such as Rural Exclusive (RE) and Residential Planned Development (RPD) that have not been updated since COSCA acquired the parcels for conservation. Portions of the Project area extend beyond the city boundary and are instead within the planning jurisdiction of the County of Ventura. Zoning in these areas is Open Space (OS) (Ventura County Find My Zoning Search).

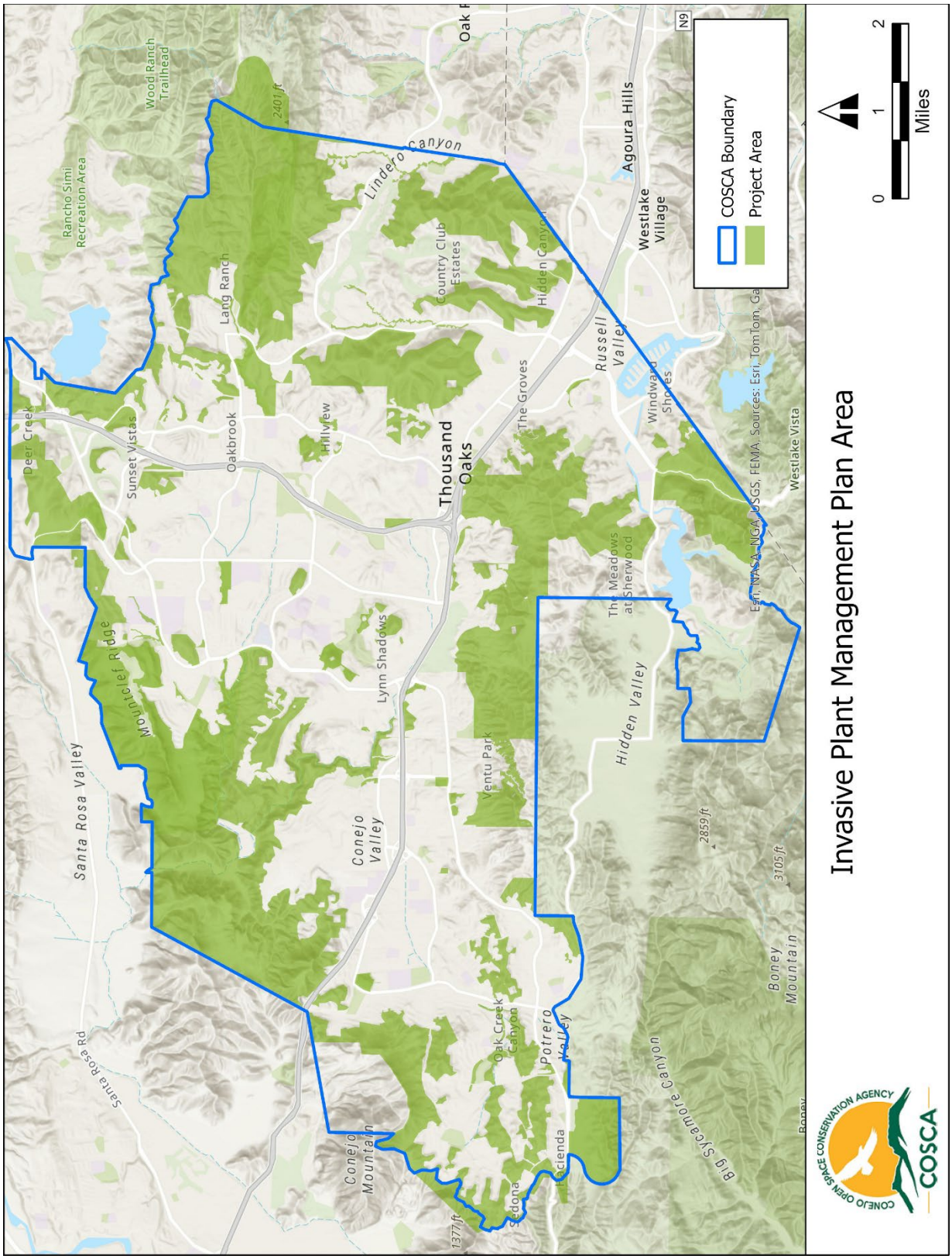

Figure 1 - Regional Location

Project Description

The Conejo Open Space Conservation Agency (COSCA) is a joint powers agency formed in 1977 as a partnership between the City and CRPD. COSCA provides for the long-term protection and stewardship of public open space lands and trails. COSCA's core mission is to "acquire, conserve, and manage open space within and surrounding the Conejo Valley for future generations, sustainably balancing public use with ecosystem protection." COSCA currently owns and/or manages approximately 13,000 acres of open space and maintains a 150-mile trail system. The COSCA-owned/managed land represents approximately 85 percent of the approximately 15,000 acres of open space land existing within COSCA's jurisdictional area.

California is recognized as one of the world's 36 global biodiversity "hot spots" with over 6,500 species of native plants, one-third of which are endemic. However, California's exceptional biodiversity faces serious threats from the growing human population, habitat loss, invasive species, catastrophic wildfires, and climate change. The proposed project addresses invasive plant species and associated habitat loss to stem the loss of biodiversity in public open space areas.

Invasive plant species are a problem in natural areas because native wildlife, including mammals, birds, and aquatic species, are adapted to native plant communities and rely on them for shelter and forage. Invasive plants can out-compete native plants because the natural constraints that limit their expansion in their areas of origin are not present in the areas they invade. When native plants are replaced with non-native plants, the support structure for native plant and wildlife species is reduced and the impacts may extend throughout the local ecology. Controlling these species, therefore, is an important part of COSCA's mission to steward biological resources throughout the open space system.

The invasive plant management plan (IPMP) has been prepared to guide and assist COSCA land managers in carrying out invasive plant management activities as part of fulfilling the agency's commitment to protect and enhance natural resources. The project will address the management of invasive plant species on 13,000 acres under COSCA ownership and management. Guidance presented in this IPMP will facilitate strategic control of invasive plants and ensure that available financial resources are utilized when and where they will yield optimal value for the recovery and enhancement of native habitats. The project does not entail construction of any kind.

The IPMP describes existing conditions in the Project area, identifies target invasive non-native plant species to be controlled, and establishes treatment priorities. It also describes management goals and methods, prevention and management strategies, monitoring and

reporting protocols, adaptive management techniques, and best management practices to avoid environmental impacts.

Surrounding Land Uses and Setting

The extent of the Project area consists of COSCA's jurisdictional boundary, which is a combination of City of Thousand Oaks and CRPD jurisdictional boundaries owing to COSCA's status as a joint-powers agency. Actions described in the IPMP are specific to lands owned and / or managed by COSCA as well as three CRPD urban parks. COSCA open space lands generally form a ring around the perimeter of the city, and in some cases extend into developed areas within the city as well. COSCA open space is bordered by undeveloped land in the Simi Hills in the east, the Santa Monica Mountains to the south, Conejo Mountain to the west, and Mountclef Ridge to the north.

The Project area has a Mediterranean climate characterized by warm, dry summers and cool, moist winters. The region lies 10 miles north of the Pacific Ocean on the opposite side of the Santa Monica Mountain range and features a diverse topography that includes prominent mountain peaks, valleys, arroyos, and plateaus covered in grasslands, scrubland, and oak woodlands. The elevation ranges from approximately 250 to 1,700 feet. Numerous streams flow through the city that provide habitats for various wildlife species and contribute to the overall ecological balance of the area. Open space lands consist of relatively undisturbed natural habitats consisting of a variety of vegetation communities.

Since 1940, 26 fires have occurred in the project area. Fire is a natural feature of southern California vegetation types, but in pre-modern times the fire frequency interval was long, ranging from 30-100 years. With infrequent fire, vegetation communities had extended periods to generate significant seed banks in the soil (grasslands and coastal sage scrub) and extensive root systems (chaparral) to promote rapid recovery. As fires become more frequent, these plant communities do not have adequate time to reestablish the resources for recovery. When this occurs, non-native species are often able to outcompete native species. The result is expansion of non-native plant species and reduction in native plant communities in a process called type conversion; wherein native plant communities are converted to non-native communities.

Vegetation Communities and Land Cover Types

The natural community descriptions listed below are based on the California Department of Fish and Wildlife (CDFW) California Wildlife Habitat Relationships classification scheme (CWHR) (Mayer and Laudenslayer 1988) (CDFW 2023a). Figure 2 illustrates the primary vegetation communities in the Project area, consisting of California sage scrub, chaparral,

grassland and barren, riparian/coastal live oak woodland, southern oak woodland/oak savannah, freshwater marsh, and biological crusts, which are further discussed below.

California Sage Scrub

Along with chaparral, California sage scrub is the most widespread plant community in undeveloped areas of Thousand Oaks. It is comprised of small semi-woody shrubs, including California sagebrush, bush sunflower, California buckwheat, purple and black sages, and sticky monkeyflower, to name a few. This community is often found below 1,000 feet elevation, and often inter-grades with chaparral. Two forms of this plant community occur within the Conejo Valley: "inland" and "maritime." The inland form is by far the most abundant in the Project area. The maritime form is present in western and southern portions of the Project area, where the penetration of fog provides additional moisture. The cumulative loss of California sage scrub throughout the state is of considerable concern as this habitat type supports many wildlife species. In addition, many of the region's rarest endemic plants and animals are also found in this plant community (City of Thousand Oaks 2020).

Chaparral

Chaparral is typical of Mediterranean climates around the world and found mostly on steep, north-facing slopes with shallow soil. This community usually occurs at higher elevation than California sage scrub and consists of a variety of large stiff woody shrubs, including chamise, scrub oak, manzanita, laurel sumac, mountain mahogany, and several species of ceanothus. Chaparral shrubs provide cover for large animals, serve as a major component of the diet of mule deer, and produce seeds for birds and small mammals (City of Thousand Oaks 2020).

Grassland

Grasslands are characterized by low, annual, native and non-native grasses and herbs, such as wild oats, brome grass, narrow leaf milkweed, and dove weed. This plant community is located primarily in heavy clay soils on gently rolling hills and valleys. In less disturbed areas, native grasses, such as purple needle grass, and native bulbs, such as wild hyacinth and Catalina mariposa lily, may be common. Native grassland communities are becoming increasingly scarce in California due to man-made pressures, including competition from non-native species, agricultural conversion, increased frequency of wildfires, and urbanization. In areas where grasslands have remained, this has resulted in the replacement of the native flora with introduced non-native species. On the urban/wildland interface, many native grasslands have become completely dominated by weedy annual species such as ripgut brome, black mustard, and tocalote (City of Thousand Oaks 2020).

Freshwater Marsh

In Thousand Oaks, freshwater marsh covers the smallest geographic area of any of the natural communities in Thousand Oaks, primarily located along the margins of Lake Eleanor and in wetlands adjacent to the Hill Canyon Treatment Plant. This community is comprised of herbaceous perennial plants that occur where water accumulates. Common plants in this community include cattails, tule reeds, and water plantain. Freshwater marsh areas are commonly used as foraging and breeding areas by waterfowl (City of Thousand Oaks 2020).

Riparian and Coast Live Oak Woodland

Riparian and coast live oak woodlands are mostly restricted to perennial streams or springs where there is moisture at or near the surface for most of the year; coast live oak woodland also occurs on north-facing slopes with appropriate soil moisture regimes. This plant community naturally occurs in valleys and canyons and provides important habitat for wildlife. However, the extent of this plant community is limited and comprises less than three percent of the Project area. Riparian woodland consists of an overstory of large, mostly deciduous trees, such as arroyo and red willow, coast live oak, California sycamore and Fremont cottonwood, with an understory of shrubs such as California wild rose and mule fat. Herbaceous riparian habitat consists of a dense growth of low perennial plants, such as cattails, rushes, and sedges. (City of Thousand Oaks 2020).

Southern Oak Woodland/Oak Savannah

Southern oak woodlands and savannahs primarily occur in gently rolling foothills and valleys. This habitat type is comprised of large, widely spaced valley oaks separated by extensive grasslands. This plant community is present in the Project area but in its undisturbed form is limited to small geographic areas. Southern oak woodlands and savannahs support a wide variety of bird and animal species wherever they occur (City of Thousand Oaks 2020).

Biological Crusts

Although not technically a plant community, biological crusts are a unique assemblage of organisms comprised of cyanobacteria, mosses, lichens, and liverworts. They occur in most plant communities in the Project area but are best represented in chaparral and California sage scrub. Research indicates that these biotic communities perform several critical functions in ecosystems. Belying their humble appearance, they provide soil stability by cementing soil particles together, thereby providing resistance to wind and water erosion. They also increase water infiltration by retarding run-off and suppress invasive plant germination by forming a “crust” on the soil that most invasive plant seeds cannot penetrate. In areas where the crust has been removed by trampling, or movement of heavy equipment,

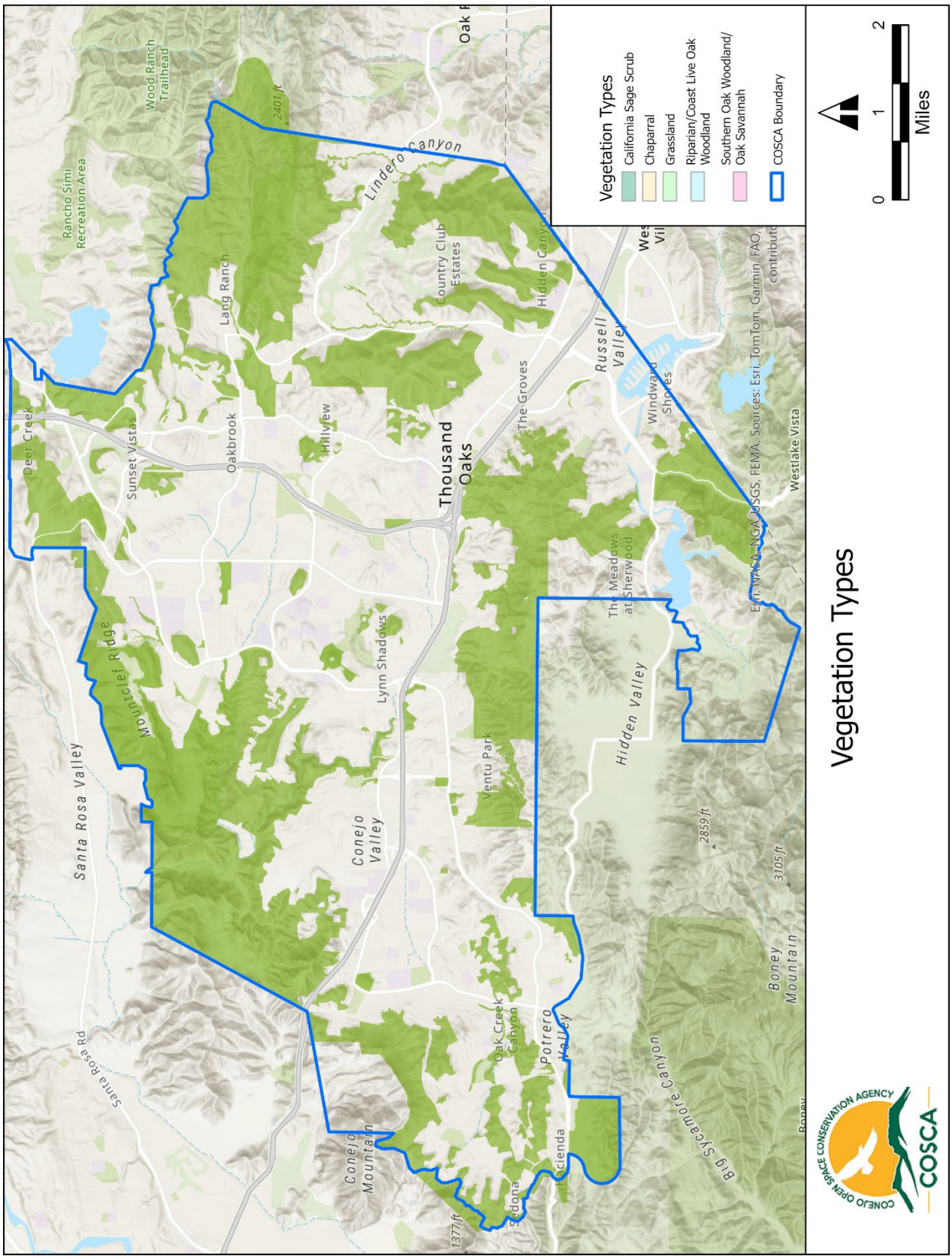

Figure 2- Vegetation Types

weedy introduced plants colonize the soil, crowding out native species. (City of Thousand Oaks 2020).

Waterbodies and Wetlands

Thousand Oaks contains two man-made lakes: Westlake Lake, which is privately owned, and Lake Eleanor, which is owned by COSCA. Additional lakes including Lake Sherwood, Las Virgenes Reservoir, and Bard Reservoir are found on the periphery of the Project area. Las Virgenes and Bard Reservoirs are used for drinking water. The lakes are surrounded by riparian habitat, which provide natural habitat for migratory birds. In some cases, lakes also support fish communities.

The Conejo Valley straddles two primary watersheds. Most of the valley drains to Calleguas Creek via Conejo Creek, Arroyo Conejo Creek, Lang Creek, and Skelton Canyon Creek. The southeasternmost portion of the Project area drains to Malibu Creek via Triunfo Creek.

Special Status Species

For the purposes of this analysis, special-status species include the following:

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA), including proposed and candidate species;
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA);
- Species designated as Fully Protected by the California Fish and Game Code (CFGC), and Species of Special Concern or Watch List by CDFW;
- Plant species protected by the Native Plant Protection Act (NPPA) (State Rare);
- Plant species with California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR) 1A, 1B, 2A and 2B;

Queries of scientific databases provided by the US Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), the California Native Plant Society (CNPS), and other resources, were conducted in 2023 for the Environmental Impact Report for the City of Thousand Oaks General Plan to obtain comprehensive information regarding state and federally listed species as well as other special-status species considered to have potential to occur within the Project area. The Thousand Oaks General Plan area includes the Project Area for the Invasive Plant Management Plan, and the results of the search apply to this document. The CDFW California Natural Diversity Database (CNDDB) (CDFW 2023) query included the Project area and an additional 5-mile radius. The CNPS's Inventory of Rare and Endangered Plants (CNPS 2025) included the Thousand Oaks, California USGS 7.5-minute topographic quadrangle and the surrounding eight quadrangles (Newbury Park, Point

Dume, Triunfo Pass, Malibu Beach, Calabasas, Simi Valley East, and Simi Valley West). The results of these scientific database queries were compiled into a table that is presented in Appendix E of the Thousand Oaks General Plan ("Exhibit E"). Species that occur in habitats that are not present within the Project area and species known to be extirpated from the region were excluded from the table.

Special-status Wildlife

A total of 24 special-status invertebrate, fish, amphibian, reptile, bird, and mammal species have the potential to occur in the Project area. Appendix E identifies animal species with the potential to occur in the Project area and their habitat requirements.

Of the 24 special-status wildlife species with the potential to occur in the Project area, the following species have federal and/or State listing status:

- Crotch's bumble bee (*Bombus crotchii*) - State Candidate Endangered
- Tricolored blackbird (*Agelaius tricolor*) – State Threatened, CDFW Species of Special Concern
- Coastal California gnatcatcher (*Polioptila californica californica*) – Federally Threatened, CDFW Species of Special Concern
- Least Bell's vireo (*Vireo bellii pusillus*) – Federally Endangered, State Endangered
- Bank swallow (*Riparia riparia*) – State Threatened
- California red-legged frog (*Rana draytonii*) – Federally Threatened, State Threatened

Special-status Plant Species

A total of 38 special-status plant species have the potential to occur within the Plan area. Appendix E shows the special-status plant species and habitat requirements for each species within the vicinity of the Project area.

Of the 38 special-status plant species with the potential to occur in the Project area, the following species have federal and/or State listing status:

- Braunton's milk-vetch (*Astragalus brauntonii*) - Federally Endangered
- Agoura Hills dudleya (*Dudleya cymosa* ssp. *agourensis*) – Federally Threatened
- Marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*) – Federally Threatened, State Rare
- Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*) – Federally Threatened
- Conejo dudleya (*Dudleya parva*) – Federally Threatened
- Verity's dudleya (*Dudleya verityi*) – Federally Threatened
- California Orcutt grass (*Orcuttia californica*) - Federally Endangered, State Endangered
- Lyon's pentachaeta (*Pentachaeta lyonii*) - Federally Endangered, State Endangered

Sensitive Natural Communities

Special-status habitats are vegetation communities, associations, or sub-associations that support concentrations of special-status plant and/or wildlife species, are of relatively limited distribution, or are of particular value to wildlife. Although special-status habitats are not afforded legal protection unless they support special-status species, potential impacts to such habitats may trigger the prescription of mitigation measures by resource agencies to offset impacts to those habitats.

Sensitive habitats are special-status plant communities considered sensitive by federal, State, and local agencies due to their rarity or value in providing habitat for vegetation, fish, and wildlife. Sensitive habitats present within the Project area include Southern Coast Live Oak Riparian Forest, Southern Riparian Forest, Southern Sycamore Alder Riparian Woodland, and Valley Oak Woodland.

Nesting Birds

Suitable nesting sites for avian species and the species themselves are protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), including shrubs, trees, grasslands, and man-made structures throughout the Project area. Some species prefer vegetation for nesting, including native and ornamental vegetation, while other species can be found nesting in man-made structures, such as power poles or the eaves of buildings. Birds typically construct their nests during the breeding season, which is generally February 1 through September 15 but beginning January 1 for all raptor species.

Critical Habitat

Critical habitat is a term used in the federal Endangered Species Act to identify specific geographic areas that contain features essential for the conservation of a threatened or endangered species that may require special management or protection. These habitats provide suitable conditions that may provide nesting/denning sites, foraging areas, cover, and other resources that are essential to the species' survival, reproduction, and genetic diversity. The USFWS has established Critical Habitat areas because a particular threatened or endangered species faces various threats to its habitat, including urban development, agriculture, invasive species, and habitat fragmentation. The habitat areas were defined based on scientific studies and analysis of the species' habitat requirements. The designation of critical habitat does not necessarily restrict all human activities within the designated areas; however, it requires federal agencies to consult with the USFWS to ensure that all proposed actions or projects do not adversely modify or destroy the critical habitat. It is also important to note that the species may also occur outside these designated areas

within similar habitats occurring throughout the Project area and consultation with the USFWS is still required in the event suitable habitat for the species may be impacted.

The USFWS Critical Habitat Portal (USFWS 2025) was reviewed to obtain information on the limits of federally defined Critical Habitat areas which provide habitat for endangered species. Based on this review, open space areas in Thousand Oaks contain critical habitat for three endangered species: coastal California gnatcatcher, Lyon's pentachaeta, and Braunton's milkvetch. Brief summaries of these species are provided below.

Coastal California Gnatcatcher

Coastal California Gnatcatcher (*Polioptila californica californica*) is a federally listed threatened species for which the USFWS has designated Critical Habitat areas primarily along the northern extent of the Project area. These areas consist of optimal coastal sage scrub ecosystems, which are characterized by low, dense shrubs, and adjacent native plant communities. The species is also known to occur in similar habitats outside federally defined critical habitat areas, including the open space areas along Wildwood Park and Mountclef Ridge within the northern City limits.

Lyon's Pentachaeta

Lyon's pentachaeta (*Pentachaeta lyonii*) is a federal and California endangered plant species with a CNPS Rare Plant Rank 1B.1 designation (Rare, Threatened, or Endangered in California and elsewhere). The species is an annual plant in the sunflower family that blooms with small yellow flowers from March through August. USFWS designated Critical Habitat occurs throughout the Project area grassland vegetation communities on rocky clay soils of volcanic origin. Specifically, critical habitat for this species occurs throughout Wildwood Park, hillsides near Lake Sherwood, and among undeveloped knolls throughout the central portions of the city.

Braunton's Milk Vetch

Braunton's milkvetch (*Astragalus brauntonii*) is a federal endangered perennial herb species with a CNPS Rare Plant Rank 1B.1 designation. USFWS designated Critical Habitat occurs primarily near the community of Oak Park in undeveloped areas consisting of coastal sage scrub and grassland communities.

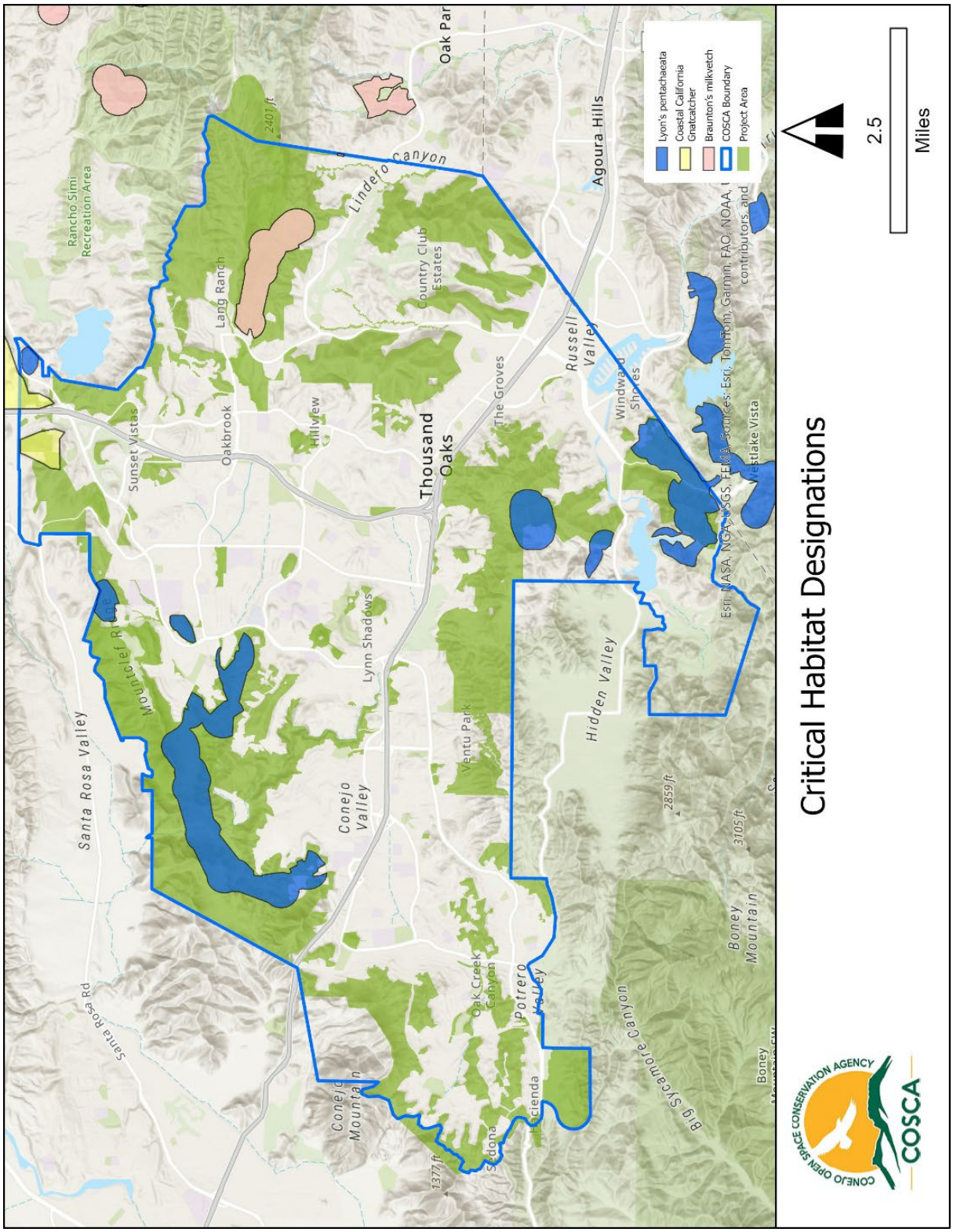

Figure 3- Critical Habitats

Wildlife Movement Corridors

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover.

Many local wildlife species, including mountain lions, bobcats, gray foxes, coyotes, and mule deer, depend on access to large areas of connected habitats for feeding and dispersal. Urban development patterns have the potential to fragment habitats and limit the ranges of wildlife. Wildlife corridors represent the last remaining access areas that connect fragmented patches of habitat. The fragmentation of natural areas in Ventura County and Thousand Oaks due to development patterns limits the ability of plant and animal populations to disperse and move to different areas. Maintaining and enhancing existing habitat linkages is essential to ensuring the preservation of regional natural resources, biodiversity, and sensitive species (City of Thousand Oaks 2024).

The Santa Monica-Sierra Madre Wildlife Corridor, located along the northern fringes of Thousand Oaks, is one of the few remaining coastal connections in the South Coast Ecoregion. This corridor was documented in the South Coast Missing Linkages Project (South Coast Wildlands 2006) and was established as a planning region in 2019 by the Ventura County Board of Supervisors. It is designed to protect landscape linkages for 20 focal species that are sensitive to habitat loss and fragmentation. These focal species cover a wide array of habitats and movement needs in the region. Due to the existing level of development, the urban areas of Thousand Oaks are not considered wildlife corridors. Regional wildlife corridors in Thousand Oaks are shown in Figure 4.

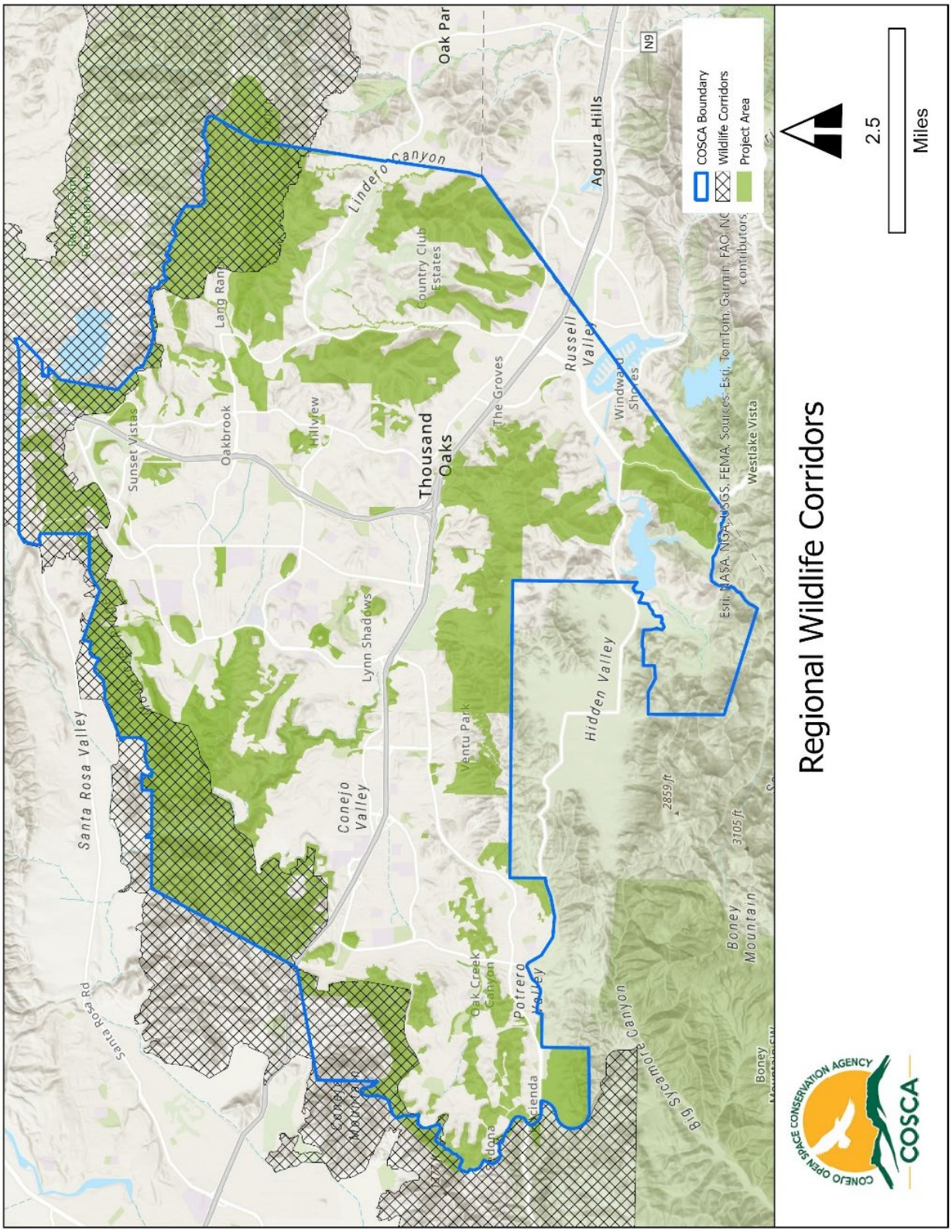

Figure 4- Regional Wildlife Corridors

Regulatory Setting

Federal Regulations

Endangered Species Act

The USFWS and National Marine Fisheries Service (NMFS) share responsibility for implementing the Endangered Species Act (ESA). Generally, the USFWS implements the ESA for terrestrial and freshwater species, while the NMFS implements the ESA for marine and anadromous species. Projects that would result in "take" of any threatened or endangered animal species, or a threatened or endangered plant species if occurring on federal land, are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of the ESA, depending on the involvement by the federal government in funding, authorizing, or carrying out the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of the ESA. However, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

Fish and Wildlife Coordination Act

The USFWS also has responsibility for project review under the Fish and Wildlife Coordination Act. This statute requires that all federal agencies consult with USFWS, NMFS, and CDFW for activities that affect, control, or modify streams and other water bodies. Under the authority of the Fish and Wildlife Coordination Act, USFWS, NMFS, and CDFW review applications for permits issued under Section 404 and provide comments to USACE about potential environmental impacts.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) of 1918 implements four international conservation treaties that the U.S. entered into with Canada in 1916, Mexico in 1936, Japan in 1972, and Russia in 1976. It is intended to ensure the sustainability of populations of all protected migratory bird species. The law has been amended with the signing of each treaty, as well as when any of the treaties were amended, such as with Mexico in 1976 and Canada in 1995. The MBTA prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by USFWS.

The list of migratory bird species protected by the law, in regulations at 50 CFR Part 10.13, is primarily based on bird families and species included in the four international treaties. A migratory bird species is included on the list if it meets one or more of the following criteria:

1. It occurs in the United States or U.S. territories as the result of natural biological or ecological processes and is currently, or was previously listed as, a species or part of a family protected by one of the four international treaties or their amendments.
2. Revised taxonomy results in it being newly split from a species that was previously on the list, and the new species occurs in the United States or U.S. territories as the result of natural biological or ecological processes.
3. New evidence exists for its natural occurrence in the United States or U.S. territories resulting from natural distributional changes and the species occurs in a protected family.

In 2004, the Migratory Bird Treaty Reform Act (MBTRA) limited the scope of the MBTA by stating the MBTA applies only to migratory bird species that are native to the United States or U.S. territories, and that a native migratory bird species is one that is present as a result of natural biological or ecological processes. The MBTRA requires the USFWS to publish a list of all nonnative, human-introduced bird species to which the MBTA does not apply, and an updated list was published in 2020. The 2020 update identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the United States or U.S. territories is solely the result of intentional or unintentional human-assisted introductions.

Clean Water Act Section 404

Congress enacted the Clean Water Act (CWA) “to restore and maintain the chemical, physical, and biological integrity of the Nation's waters.” Section 404 of the CWA authorizes the Secretary of the Army, acting through the United States Army Corps of Engineers (USACE), to issue permits regulating the discharge of dredged or fill materials into the "navigable waters at specified disposal sites."

Section 502 of the CWA further defines "navigable waters" as “waters of the United States, including the territorial seas.” “Waters of the United States” (or WOTUS) are broadly defined at 33 CFR Part 328.3 to include navigable waters, perennial and intermittent streams, lakes, rivers, ponds, as well as wetlands, marshes, and wet meadows. In recent years, the USACE and US Environmental Protection Agency (USEPA) have undertaken several efforts to modernize their regulations defining “waters of the United States” (e.g., the 2015 Clean Water Rule and 2020 Navigable Waters Protection Rule), but these efforts have been frustrated by legal challenges which have invalidated the updated regulations. As of May 2023, the United States Supreme Court issued a decision in Sackett vs. EPA limiting Clean

Water Act Jurisdiction by reducing the Clean Water Act's geographic reach and modifying the definition of "waters of the United States".

State Regulations

California Endangered Species Act

The California Endangered Species Act (CESA) (Fish and Game Code Section 2050 et. seq.) prohibits take of state listed threatened or endangered species. Take under CESA is defined as "Hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (Fish and Game Code sec. 86). This definition does not prohibit indirect harm by way of habitat modification, except where such harm is the proximate cause of death of a listed species. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated. Unlike the federal ESA, CESA's protections extend to candidate species during the period (typically one year) while the California Fish and Game Commission decides whether the species warrants CESA listing.

Fish and Game Code Sections 3511, 4700, 5050 and 5515 govern Fully Protected Species (FPS). Most of these species are considered threatened or endangered under the CESA (CDFW 2023b). No licenses or permits may be issued for take of FPS except under limited circumstances such as those signed into law as part of SB 147 in July 2023. SB 147 allows permits to take FPS for infrastructure projects such as utility-scale wind and solar infrastructure, critical regional or local water agency infrastructure, and certain transportation projects.

Avian Protection Laws

California Fish and Game Code sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the Code protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level offense to take any bird in violation of the federal MBTA.

Native Plant Protection Act

CDFW also has authority to administer the Native Plant Protection Act (NPPA) (Fish and Game Code Section 1900 et seq.). The NPPA requires CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare, and prohibits the take of listed plant species. Effective in 2015, CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA's permitting procedures would be applied to plants listed under the NPPA as "Rare." With this change,

there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

Other State Laws

Other state regulatory laws govern treatment of water bodies including the Clean Water Act Section 401, Porter-Cologne Water Quality Control Act, and CFGC Section 1600 et seq. These outline authorities of the California Department of Fish and Wildlife and Regional Water Quality Control Board as they relate to permits required to work within certain waterways.

Local Regulations

Ventura County Watershed Protection District

The Ventura County Watershed Protection District (VCWPD), implements Flood Plain Management Ordinance 3841 on behalf of Ventura County and ensures compliance with the National Flood Insurance Program. This includes review of structures proposed to be built in a floodplain associated with the bed, banks and overflow areas of VCWPD jurisdictional redline channels. The list of redline channels was adopted by the Ventura County Board of Supervisors in 1960 and then updated and confirmed by them in 1994. Ventura County defines a redline channel as conveying about 500 cubic feet per second or more in a 100-year runoff event.

Oak Tree Preservation and Protection Ordinance

The Oak Tree Preservation and Protection Ordinance (City of Thousand Oaks Municipal Code, Article 42) requires that the owner of any property that contains oak trees must maintain all trees in a state of good health, as outlined by the Oak Tree Preservation and Protection Guidelines. A Protected Tree Permit is required for any person to cut, remove, or relocate any species of oak tree, whether native or not, on any public or private property in the city.

Landmark Tree Preservation and Protection Ordinance

The Landmark Tree Preservation and Protection Ordinance (City of Thousand Oaks Municipal Code, Article 43) requires the preservation of healthy landmark trees. Trees protected under the ordinance include the following species: California sycamore, California bay laurel, California black walnut, and toyon (California holly). A Protected Tree Permit must be issued by the City for any person to cut, remove or relocate any landmark tree on any public or private property in the city.

Tribal Consultation

On December 12, 2025, COSCA sent a letter to the Barbareno / Ventureno Band of Mission Indians, Cultural Resource Department, with an invitation / request for tribal consultation for the IS/MND in compliance with AB 52 (California Public Resources Code, Section 21074). Pursuant to Public Resources Code (PRC) Section 21080.3.1(b), a letter to request Assembly Bill 52 consultation must be received within 30 days from the receipt of the request. A request for consultation was not received by COSCA within this period.

Impact Analysis

Methodology and Significance Thresholds

As a programmatic document, this MND presents an assessment of the potential for adoption and implementation of the COSCA Invasive Plant Management Plan to result in significant impacts to resources described in Appendix G of the CEQA guidelines.

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	■	Hazards & Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	■	Wildfire	■	Mandatory Findings of Significance

Determination

Based on 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 revisions to the project have been made by or agreed to by the project proponent. 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 "less than significant with mitigation incorporated" 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 potential 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.

Brian Stark
COSCA Administrator

1/13/2026
Date

Environmental Checklist

Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	■
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	■
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☐	■

a. Would the project have a substantial adverse effect on a scenic vista?

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Project activities consist of small-scale vegetation management in locations not broadly visible in the public viewshed and therefore would not cause a substantial adverse effect on a scenic vista. The project does not entail any construction and occurs within natural open space characterized by vegetated hillsides, grasslands, tree-lined streams, oak woodlands, and oak savannas. There are no historic buildings in the project area, nor is it near any state-designated scenic highways, and no new features would be added to the public viewshed. Selective removal of individual invasive plants dispersed across large areas would not be discernible among remaining vegetation, and although portions of the site are visible from hiking trails, the removal of scattered non-native species within dense vegetation would not alter the landscape. As a result, the project would not substantially damage scenic resources or adversely affect scenic vistas. Additionally, because no construction or new features are proposed, the project would not create any new source of substantial light or glare, and no impact would occur.

NO IMPACT

Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. 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 defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. 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?	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the

Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. *Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?*

c. *Would the project 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 defined by Government Code Section 51104(g))?*

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

e. *Would the project 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?*

The Project area consists of permanently protected open space and has a land use designation of Existing Parks, Golf Courses, Open Space. The current primary zoning for the project area is Open Space (O-S), which allows for the preservation of open space and passive recreational facilities. The Project area is not located on agricultural land and has no agricultural uses. The proposed project entails the removal and management of invasive non-native plant species and does not entail construction of any kind. As such, the proposed project would not convert prime farmland, unique farmland, or farmland or statewide importance to non-agricultural uses (California Department of Conservation 2021). Additionally, no part of the Project area is under a Williamson Act contract, and there are no uses associated with forestry on the Project area or adjacent properties. Therefore, the project would not result in impacts on agriculture and forestry resources.

NO IMPACT

Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	■
b. 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?	☐	☐	☐	■
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	■
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	■

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

According to the VCAPCD's guidelines, a project may be inconsistent with the applicable air quality plan if it would cause the existing population to exceed forecasts contained in the most recently adopted AQMP. As the proposed project entails the removal and management of invasive non-native plant species and does not involve the construction of residential or commercial developments, it does not directly or indirectly induce population growth. Therefore, the project would not conflict or obstruct implementation of any air quality plans, and no impact would occur.

NO IMPACT

b. Would the project 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?

Invasive species management actions comprising the proposed project will consist of removal of invasive plants via manual, mechanical, cultural, and chemical methods. Manual removal refers to actions undertaken by hand and the use of handheld tools such as hoes, shovels, weed whips, weed wrenches, or power tools such as chainsaws. These are used to remove individual invasive species while leaving non-target species in place and undisturbed. Mechanical removal refers to the use of heavy equipment. For the Project it refers specifically to mowing using a tractor. This method may be utilized to manage invasive grassland species. Mowing may result in minor temporary dust generation, but no mechanical soil disturbance such as tilling is planned. Mechanical equipment also generates emissions, but such emissions would also be temporary and would not be unusual. Cultural removal generally includes prescribed grazing and prescribed fire. The IPMP does not include prescribed burning, so this refers specifically to prescribed grazing, which may be used to manage invasive grassland species. Chemical control refers to the use of herbicides. Chemical treatments will utilize materials that do not readily volatilize, and will not be used in volumes capable of generating airborne pollutants.

Due to dispersed distributions of invasive plants, and the small scale of vegetation management efforts, the project will not contribute to fugitive particulates or other air quality impacts. The project would be subject to VCAPCD Rule 51, Nuisance, which prohibits discharge of air contaminants or any material from a source that would cause injury, detriment, nuisance, or annoyance to the public, and Rule 55, Fugitive Dust, which requires implementation of control measures during project activities to reduce dust emissions. As such, project implementation would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment, and no impact would occur.

NO IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Project area is located on undeveloped land that is permanently protected as open space. These lands are outside of the developed portions of the city where sensitive receptors are located. Project activities will consist of small-scale vegetation removal and management efforts for short periods of time. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations, a substantial number of people would not be affected by other emissions, and no impact would occur.

NO IMPACT

Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. 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?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d. 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?	☐	☐	☐	■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	■

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

a. *Would the project 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?*

b. *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project will be implemented on lands acquired specifically for conservation and the protection of natural resources. As such, the project area contains a wide variety of habitat types and individual plant and wildlife species, some of which are designated as special status species. Generally, removal of invasive plant species is a direct benefit to all native plant communities, and by extension, native wildlife. As such, removal of invasive species is anticipated to enhance habitat quality in the Project area.

Invasive species management actions will consist of removal of invasive plants via manual, mechanical, cultural, and chemical methods. Manual removal refers to actions undertaken by hand and the use of handheld tools such as hoes, shovels, weed whips, weed wrenches, or power tools such as chainsaws. These are used to remove individual invasive species while leaving non-target species in place and undisturbed. Mechanical removal refers to the use of heavy equipment. For this project it refers specifically to mowing using a tractor, as no mechanical soil disturbance such as tilling is planned. This method may be used to manage invasive grassland species. Cultural removal generally includes prescribed grazing and prescribed fire. The IPMP does not include prescribed burning, so this refers specifically to prescribed grazing, which may be used to manage invasive grassland species. Chemical control refers to the use of herbicides. While a broad array of chemical compounds is available for invasive plant management, the IPMP limits herbicide use to three compounds

that best balance efficacy and prevention of harm to non-target species (glyphosate, triclopyr, and aminopyralid). More information about herbicides is contained in the Hazardous Materials section.

Management of invasive species is a vital action in furtherance of local and regional conservation plans including the Conejo Canyons Open Space Management Plan (Goal 5.1.1), Thousand Oaks General Plan Conservation Element (Goals C-5, C-6, C-8), COSCA Strategic Plan (Objective 2.1). The project will not conflict with any local, regional, state, or federal plans.

Some project activities will occur within riparian habitats, primarily the removal of giant reed (Arundo donax) and Mexican fan palm (Washingtonia robusta). Projects located in riparian zones would be subject to the provisions of federal and State regulations protecting biological and water resources. Impacts to riparian species during project activities will be avoided with the mitigation measures listed below, which will be implemented to protect all native plant and wildlife species, including those listed as protected species.

BIO-1: Worker Environmental Awareness Program

Prior to initiation of all project activities (including staging and mobilization), all personnel associated with project activity shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources with the potential to occur in the Project area. This training shall include information about all special-status species determined to be present or to have a moderate or high potential to occur on site. Training shall also address protected nesting birds, special status plants, sensitive habitats, as well as other special status species potentially occurring on the Project area.

The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of project activity and measures required to avoid and minimize impacts to biological resources within the Project area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with the project. All employees shall sign a form provided by the trainer documenting they attended the WEAP and understand the information presented. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species. If new personnel are added to the project, the crew foreman shall ensure the new personnel receive the WEAP training before starting work.

BIO-2: General Best Management Practices

General requirements which shall be followed by project personnel are listed below.

1. Prior to entering the project site, workers shall inspect their clothing, including shoes, all vehicles, and equipment for invasive plant seeds or plant parts. The undercarriage and tires of vehicles, power tools, and other equipment, shall be power washed and clean from any seeds, pathogens, and mud before entering the project site for the first time.
2. Project-related equipment and vehicles will not be left in the work area overnight.
3. All litter and pollution regulations shall be followed, and any trash generated by the project shall be removed daily from the work site.
4. No feeding of wildlife will be allowed, and pets will not be allowed on the project site.
5. Work will take place only during daylight hours.
6. No cut or removed biomass will be placed or allowed to be discharged into any waterway.
7. Use existing roads, trails, or disturbed areas to the maximum extent feasible. Limit off-road travel and turning of equipment.
8. Locate staging areas in previously disturbed locations, outside ESAs and drainages.
9. Avoid work during heavy rain events.

BIO-3: Regulatory Compliance

For Project activities that will occur within the jurisdictional areas of local, state and federal agencies, COSCA will consult with these agencies and secure all necessary permit authorizations. Project permits may include additional avoidance measures for the protection of special status plants or wildlife.

BIO-4: Preconstruction Wildlife Surveys and Biological Monitoring in Riparian Habitats

For project activities that will occur within riparian habitat areas, a qualified biologist familiar with special status plant and wildlife species with potential to occur in the Project area shall conduct preconstruction surveys for all special status species. The biologist shall be on site immediately prior to and during project activity to move special status species or other wildlife of low mobility out of harm's way that could be injured or killed. Collected wildlife shall be removed and placed onto adjacent and suitable species-specific habitat in the vicinity that is out of harm's way. A qualified biological monitor shall have the authority to halt construction to prevent or avoid take of any special status species and/or to maintain compliance with all avoidance, minimization, and mitigation measures (i.e., BIO-1 through

BIO-8). The biologist shall recommend measures to maintain compliance with all avoidance and minimization measures and applicable permit conditions. When the biological monitor is present on site, they shall be responsible for:

- Ensuring procedures for verifying compliance with environmental mitigation are followed
- Lines of communication and reporting methods
- Daily and weekly reporting of compliance
- Construction crew WEAP training
- Authority to stop work
- Action to be taken in the event of non-compliance

BIO-5: Least Bell's Vireo Preconstruction Surveys

If project activities occur during the Least Bell's Vireo breeding season (March 15–September 15) within or adjacent to suitable riparian habitat, a qualified biologist shall conduct a pre-construction presence/absence survey no more than 14 days prior to project activities. If Least Bell's Vireo is detected or suspected, protocol surveys shall be conducted in accordance with current USFWS guidelines to determine occupancy. If occupancy is confirmed, the project shall avoid occupied habitat, including establishment of appropriate no-disturbance buffers, or shall implement additional measures in coordination with USFWS and CDFW. Project activities shall comply with all applicable federal and state regulations for this species.

BIO-6: Nesting Birds

Pre-construction nesting bird surveys shall be conducted during the time of day when birds are active and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird survey results, if applicable, shall be submitted to COSCA for review and approval prior to vegetation disturbance activities.

Invasive vegetation removal and management in suitable nesting habitat (including shrubs, trees, and dense herbaceous cover) shall occur outside the typical nesting bird season (February 1–September 15) to the extent feasible. If work must occur during this period, a qualified biologist shall conduct nesting bird surveys within 7–14 days prior to work. Active nests shall be protected with species-appropriate no-disturbance buffers (typically 50–300 feet, or more for raptors) until the young have fledged, as determined by the biologist.

BIO-7: Bat Surveys

During the removal of mature palm trees, the presence or absence of any bat roosts shall be confirmed prior to the initiation of project activities. A qualified bat specialist shall conduct

bat surveys within the Project site and within a 500-foot buffer to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be used to maximize detection of bats. Night roosts are typically utilized from the approach of sunset until sunrise. Maternity colonies, composed of adult females and their young, typically occur from spring through fall.

If bats are detected in mature palm trees, or if bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in trees, these trees will be treated with herbicide by direct injection and left in place to decompose over time, giving bats the opportunity to relocate to alternative locations.

BIO-8: Disturbance Minimization

In habitat areas with a high percentage of native plant species, invasive plant control shall emphasize hand removal, cut-stump, and targeted herbicide application rather than use of mechanical methods.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project consists of invasive plant species removal and management and does not include construction of any kind. No project activities will entail any actions to remove, fill, hydrologically interrupt, or otherwise impact state or federally protected wetlands. Therefore, no impact to these resources would occur.

NO IMPACT

d. Would the project 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?

The Project consists of invasive plant species removal and management and does not include construction of any kind. Project activities will result in the improvement of habitat quality throughout the Project area, thereby benefitting both resident and migratory wildlife species. Therefore, Project activities will not interfere with resident or migratory fish or wildlife species, migratory wildlife corridors, or impede the use of native wildlife nursery sites, and no impact would occur.

NO IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City's Oak Tree Preservation and Protection Ordinance and Landmark Tree Preservation and Protection Ordinance collectively provide protection for all species of oak (*Quercus* spp.), California sycamore (*Platanus racemosa*), California bay laurel (*Umbellularia californica*), California black walnut (*Juglans californica*), and toyon (*Heteromeles arbutifolia*). The Project entails removal and management of invasive plant species, for the purpose of improving the quality of existing native habitats. It does not propose removing any native plant species or any of the preceding species protected by the City. Therefore, the Project will not conflict with any policies protecting biological resources, such as a tree preservation policy or ordinance and no impact would occur.

NO IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans that intersect with the Project area. However, the Project area occurs on lands acquired specifically for conservation and project activities will result in improvements to habitat quality. These activities are in alignment with the Conservation Element of the City's General Plan, COSCA's Strategic Plan, and Conejo Canyons Management Plan. Therefore, the project would not conflict with any adopted habitat or natural community conservation plans and no impact would occur.

NO IMPACT

Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	□	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	■

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

The Project area is not located within or adjacent to any known or potential historic districts. The City of Thousand Oaks has designated one historic feature located within the Project Area, which is the Banning Dam at Lake Eleanor (City of Thousand Oaks 2024). Project activities do not involve any work on structures. Therefore, the project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 and no impact would occur.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The Project area is not expected to contain previously undiscovered archeological resources, although existing archeological sites are found within the Project area. Most project activities will not entail soil disturbance and for those that do, it will be limited to the top four to six inches of soil when an individual invasive plant is removed by hand or using hand tools. There is a possibility that cultural objects could be uncovered near the soil surface during project activities. Mitigation measures associated with potential archaeological resources are proposed in the Tribal Cultural Resources Section.

With the proposed mitigation measures TCR-1 – TCR3 in the Tribal Cultural Resources Section, impacts to archeological resources pursuant to §15064.5 would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The project area is not expected to contain previously undiscovered burial sites. It is uncommon to find burials at depths less than three feet and any soil disturbance associated with project activities will be limited to the top four to six inches of soil when an individual invasive plant is removed by hand or using hand tools. Therefore, human remains would not be disturbed and no impact would occur.

NO IMPACT

Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	■
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	■

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Project activities are limited to invasive plant removal and management and includes follow-up site maintenance visits after initial removal activities are completed. Energy use for the project would be temporary in nature and would entail the use of gasoline and/or diesel-

powered vehicles, and gasoline and/or battery-powered handheld equipment. Such vehicles and handheld equipment are typical of small vegetation management projects in the region. In addition, project contractors would be required to comply with the provisions of California Code of Regulations Title 13 Sections 2449 and 2485, which prohibit diesel-fueled commercial vehicles and off-road diesel vehicles/equipment from idling for more than five minutes. This requirement minimizes unnecessary fuel consumption and results in efficient use of energy necessary to undertake project activities. Equipment use will decline during subsequent treatments as less work is needed following treatments. Following completion of project activities, no long-term energy use is necessary. Therefore, the project would not consume energy in a wasteful, inefficient, or unnecessary manner during project construction or operation and no impact would occur.

NO IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The Safety Element of the City's General Plan includes goals related to sustainability, as well as reduction in energy demand and greenhouse gas (GHG) emissions. More specifically, Goal S-7.2 relates to reducing community GHG emissions consistent with the intent of the State of California's California Global Warming Solutions Act of 2006 (AB 32). While Goal S-7.3 supports efforts to reduce emissions related to Municipal operations.

The City is a parent agency to COSCA, and COSCA actions are undertaken in compliance with the General Plan. The project would not consume energy or emit greenhouse gases beyond the short-term implementation period for project activities. Project activity is anticipated to be reduced annually as invasive plant management efforts reduce the expanse of areas requiring treatment. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and no impacts would occur.

NO IMPACT

Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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?	☐	☐	☐	■
2. Strong seismic ground shaking?	☐	☐	☐	■
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■
4. Landslides?	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	■
c. 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, or collapse?	☐	☐	☐	■
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	■
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not	☐	☐	☐	■

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
available for the disposal of wastewater?				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	■

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

As with the majority of southern California, the Project area is in a seismically active area and has historically experienced earthquakes from various regional faults. However, the project does not involve the construction of any structures, disturbance of soil, or any changes to the soil surface sufficient to cause destabilization of soil.

NO IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

c. Would the project 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, or collapse?

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project entails the removal and management of invasive plant species and does not entail construction of any kind. As such, Project activities will not entail grading, tillage of soil, or any other types of significant soil disturbance. Rather, project activities will be limited to the top four to six inches of soil when an individual invasive plant is removed by hand or using hand tools. Due to the small scale of individual projects, such activities would only result in minor surface soil disturbance and will be limited to that necessary to extract individual plants. Following extraction, remaining soil will be filled in and lightly compacted to prevent erosion. Plant extraction will take place in isolated patches within broadly vegetated landscapes, and surrounding vegetation will remain to maintain soil stability. Soil types are varied throughout the Project area, and some may be expansive. However, the project will result in only minor surface soil disturbance and thus would not cause instability. The Project area lies in the Transverse Range Geologic Province of Southern California and consists mainly of igneous rocks which generally do not contain fossils. While some fossil bearing soils may exist within the Project area, the limited nature of soil disturbance would cause no impact to paleontological resources. Based on the nature of the Project, it would not cause substantial soil erosion or loss of topsoil; would not result in an off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; would not create substantial direct or indirect risks to life or property; is not relevant to wastewater disposal; and would not destroy paleontological resources or unique geologic features. Therefore, no impact would occur.

NO IMPACT

Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	■
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	■

Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence which takes place in the Earth's atmosphere and helps regulate the temperature of the planet. Individual projects do not generate sufficient GHG emissions to influence climate change directly. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Project activities would be short term in nature and generate only temporary GHG emissions from the operation of gasoline or diesel-powered vehicles to access project sites. Crews would conduct project activities on foot and would use gasoline or battery-powered handheld tools on an occasional basis. Limited tractor mowing may occur at some sites, but such activity would be infrequent. The project would not construct new facilities or introduce

any long-term sources of GHG emissions. The project would not generate GHG emissions, either directly or indirectly that would have a significant impact on the environment. The temporary nature of the project would also not conflict with applicable plans, policies, or regulations whose purpose are to reduce the emissions of greenhouse gasses. Therefore, no impacts would occur.

NO IMPACT

Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	■	☐	☐
b. 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?	☐	■	□	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	■	☐	□
d. Be located on a site that is included on a list of hazardous material 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?	☐	☐	☐	■
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a	☐	☐	☐	■

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	■	☐	☐

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project 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?

The proposed project involves the implementation of an Integrated Weed Management Plan (IWMP) to control invasive plant species within the Project area. The IPMP uses a variety of methods including manual/mechanical removal, cultural techniques (e.g., prescribed grazing), and the targeted application of herbicides. Herbicide use is considered when manual methods are found to be ineffective or infeasible or are to be used in conjunction with other methods as part of an overall IWM strategy. The selection and application of any herbicide will be based on the recommendation of a California Department of Pesticide Regulation (CDPR)-licensed Pest Control Adviser (PCA). While a broad array of chemical compounds is available for invasive plant management, the IPMP limits herbicide use to three compounds that best balance efficacy and prevention of harm to non-target species (glyphosate, triclopyr, and aminopyralid). The mitigation methods listed below will be incorporated into the project.

HAZ-1: Herbicide Selection and Application Protocols

Only herbicides approved for the specific application site and target species and registered for use in California by the U.S. Environmental Protection Agency (EPA) and CDPR shall be used. Application rates and methods shall strictly follow label directions, as required by law, to prevent off-site migration and minimize non-target impacts. Spot spraying and sponge applicators shall be used, and, when feasible, biomass reduction will precede herbicide use to reduce the total amount of herbicide used. No broadcast application of herbicide is authorized.

HAZ-2: Water Quality and Aquatic Habitat Protection

For applications near aquatic environments, only herbicides approved for use in aquatic settings will be permitted. These will be applied during low channel flow periods or when seasonal streams are dry.

HAZ-3: Applicator Certification and Training

Herbicide recommendations will be made by a CDPR-licensed PCA. Herbicide applications will be made a certified applicator possessing a Qualified Applicator License (QAL) or Qualified Applicator Certificate (QAC) or under direct supervision of an individual who possesses a QAL.

HAZ-4: Timing and Environmental Conditions

Herbicide applications shall not occur during adverse weather conditions (e.g., wind, rain) that could increase the likelihood of drift or runoff into non-target areas. Applications shall be timed to impact target species during their most vulnerable growth stages to ensure efficacy and minimize chemical use.

HAZ-5: Monitoring and Reporting

The effectiveness of treatments and any new invasive plant occurrences will be monitored regularly and documented. Monitoring results will be submitted annually to appropriate oversight agencies if permits are issued.

HAZ-6: Herbicide Mixing, Equipment Cleaning and Staging Areas

All herbicide mixing will occur in designated staging areas and over a container to capture any spillage. Staging areas shall be located away from sensitive resources. All equipment cleaning will be undertaken at an appropriate off-site facility.

HAZ-7: Wildlife Protection and Habitat Features

Before initiating work each day, crews shall visually inspect access routes and work areas for wildlife (including reptiles, amphibians, small mammals, and nesting birds). Crews shall avoid disturbing rock piles, downed wood, and intact shrub cover providing important habitat structure, particularly in chaparral, coastal sage scrub, and woodland habitats. If special-status wildlife are observed, work shall pause and a qualified biologist consulted on appropriate avoidance.

COSCA finds that, with the incorporation of the above-listed mitigation measures (HAZ-1 through HAZ-7), the project impacts will be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

There are fourteen schools within 0.25 miles of the Project area (Figure 5). However, these locations intersect with the periphery of the Project area where project activities are less likely to occur. Additionally, hazardous materials will not be stored or disposed of within the Project area, and proposed herbicide application methods are designed to prevent drifting beyond the project site. The mitigation measures listed above (HAZ 1-7) will prevent any possible drift or migration of hazardous materials to school sites.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

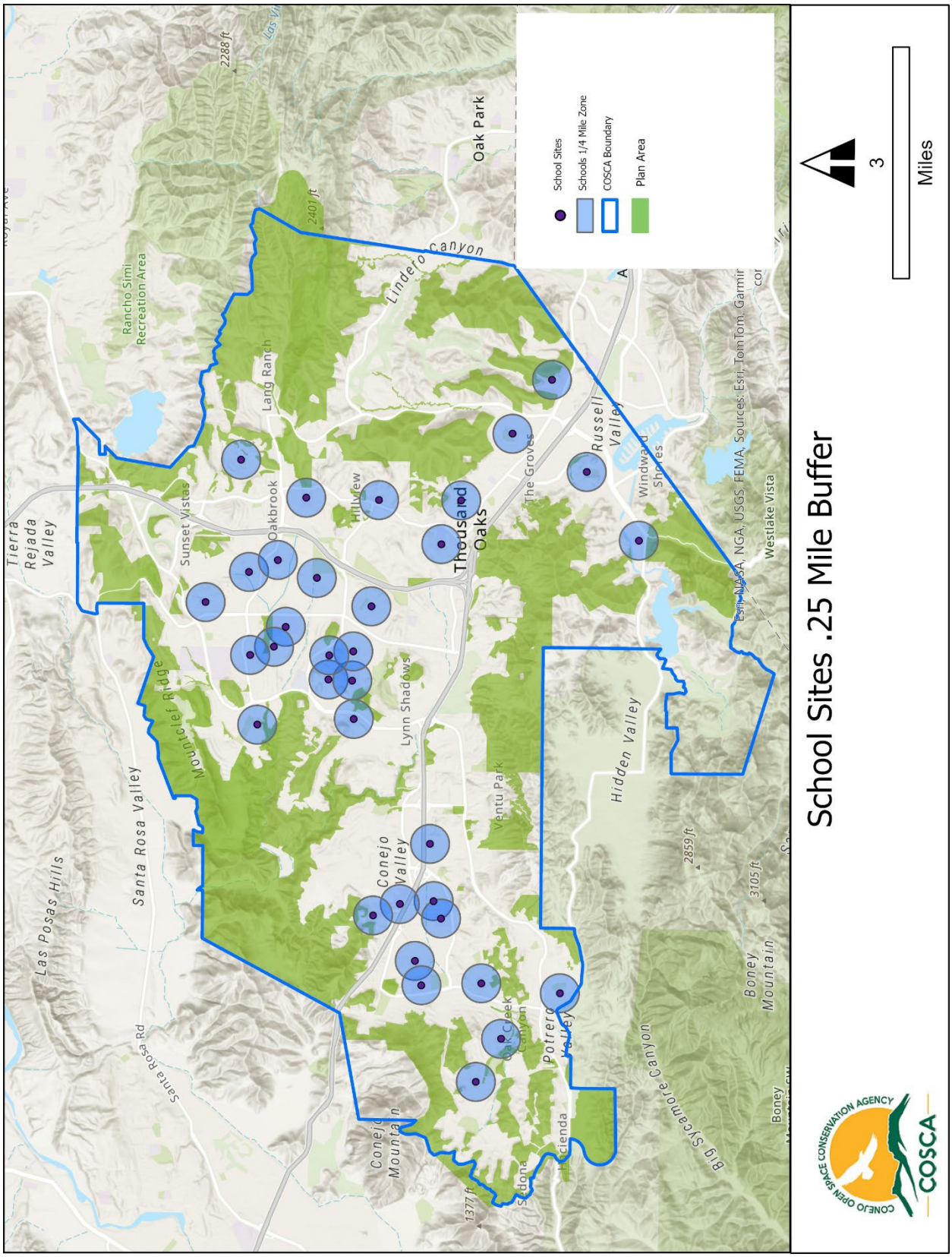

Figure 5 - School Site Buffers (0.25 Mile)

d. Would the project be located on a site that is included on a list of hazardous material 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?

The following databases and listings compiled pursuant to Government Code Section 65962.5 were reviewed on December 10, 2025.

State Water Resources Control Board – Geotracker. Search for leaking underground storage tanks (LUST) and other cleanup sites.

California Department of Toxic Substances Control – EnviroStor. A database for hazardous waste facilities or known contamination sites.

Neither database contains listings for hazardous materials sites within the Project area. As there is no evidence of existing contamination or hazardous material facilities/sites in the Project area, implementation of the project would not create a significant hazard to the public or the environment and no impact would occur.

NO IMPACT

e. For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?

The Project area is not located within an airport land use plan, or within two miles of a public or private airport. The nearest airport is the Camarillo Airport, approximately ten miles to the west, and the Project area is located outside of the Camarillo Airport's existing and future noise contours lines. The Project area also does not include developed areas where people reside or work. Therefore, implementation of the project would not expose people to safety hazards or excessive noise, and no impact would occur.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Project does not entail construction of any kind. As such, it would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

NO IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Much of the Project area is located within the California Department of Forestry and Fire Protection (CalFire) designation of Very High Fire Hazard Severity Zone. The Project area and surroundings have a lengthy wildfire history, with the most recent being the Hill and Woolsey Fires of 2018. In southern California, equipment use has been identified as a common ignition source for wildfires, such as when metal equipment blades strike rocks and then generate sparks. Various handheld power tools and mowers containing metal blades may be used for invasive plant removal as part of the Project. Contractors using such equipment will be required to adhere to the following conditions:

HAZ-8: Red-Flag Weather Conditions

The National Weather Service defines red-flag conditions as when relative humidity is 15% or less combined with sustained surface winds, or frequent gusts, of 25 mph or greater. Both conditions must occur simultaneously for at least 3 hours in a 12-hour period. Red-flag conditions may also be declared due to widely scattered (or more) dry thunderstorms, 15% or more coverage, constituting a Lightning Activity Level (LAL) 6. A thunderstorm is considered "dry" if it produces less than 0.10 inch rainfall. When conditions warrant, and the National Weather Service forecasts red-flag conditions, use of power equipment and hand tools capable of generating sparks use will be suspended.

HAZ-9: Fire Prevention and Response

No smoking will be permitted within work zones, and all vehicles shall be staged in areas free of dry vegetation. Vehicles will not travel off existing roads. Contractors and staff must carry fire suppression equipment, including a shovel and fire extinguisher on-site during project activity.

With incorporation of HAZ-8 and HAZ-9 into project methodology, the potential for people or structures to be exposed to significant risk of loss, injury, or death involving wildland fires would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	■	☐	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	■
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	■
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	■
(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	☐	☐	☐	■
(iv) Impede or redirect flood flows?	☐	☐	■	■

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	■

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction of any kind. Some Project activities will be implemented in riparian habitat areas and may include the application of herbicides to target species. However, herbicides will not be applied to water or wetland areas and will only be applied to vegetation in terrestrial areas. The project will not involve any significant soil disturbance that would cause erosion or thereby impact water quality through the discharge of any waste or include any work in wetland areas or the wetted portions of stream channels. With the incorporation of mitigation measures HAZ-2 through HAZ-6 (see preceding section) into project methodology, the potential for the Project to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface of groundwater quality would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction of any kind. Project implementation will not require any groundwater extraction or impact groundwater recharge and would not impede any existing groundwater management activities. Therefore, no impact would occur.

NO IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction or grading of any kind. Therefore, Project activities would not alter drainage patterns or the course of a stream or river or add impervious surfaces that would result in erosion or siltation on- or off-site. Project activities would also not increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, no impact would occur.

NO IMPACT

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would 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?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction or grading of any kind. Therefore, Project activities will not alter drainage patterns or the course of a stream or river or entail the addition of impervious surfaces. Therefore, the project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide addition sources of polluted runoff. No impact would occur.

NO IMPACT

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction or grading of any kind.

Therefore, Project activities would not alter drainage patterns or the course of a stream or river or add impervious surfaces that would impede or redirect flood flow. Therefore, no impact would occur.

NO IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands. Implementation of the Project will entail manual, mechanical, cultural, and chemical vegetation management methods. While chemical methods will entail the application of herbicide, chemicals will not be stored on-site. In addition, the Project area ranges in elevation from 250 to 1700 feet and is approximately 10 miles from the Pacific Ocean. It is not designated as a Tsunami Inundation Area according to the California Department of Conservation's (2009) Tsunami Inundation Maps. Further, the Project area is not located near large bodies of water subject to seiches. Therefore, the project is not subject to flood, tsunami, or seiche inundation that would risk the release of pollutants during inundation, and no impact would occur.

NO IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Project consists of the removal and management of invasive plant species on undeveloped natural lands and does not entail construction of any kind. Project implementation will not require any groundwater extraction nor would it alter infiltration. Additionally, the Project area does not have its own groundwater sustainability agency. Therefore, implementation of the Project will not conflict with any water quality control plan or sustainable groundwater management plan and no impact would occur.

NO IMPACT

Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	■

a. Would the project physically divide an established community?

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The Project area is undeveloped and does not divide a community or entail construction. The Land Use designation is Parks, Golf Courses, Open Space and the property is zoned Open Space (O-S). The project meets the intent of the following goals in the Thousand Oaks General Plan (2024):

- LU-1.1 - Maintaining and expanding the open space network and natural areas around the City.
- POS-3 - Manage and regulate open spaces to protect the natural environment.
- Goal POS-5: Manage open spaces to reduce risk of natural hazards and promote the safety of the public.
- Goal C-5: Properly manage, conserve, and protect native plant communities.
- Goal C-6: Protect sensitive, rare, threatened, or endangered species.
- Goal C-8: Preserve natural streams.

As such, the project would not physically divide an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impact would occur.

NO IMPACT

Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. 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?	☐	☐	☐	■

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project 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?

The Project area and broader Conejo Valley region do not contain any known significant mineral resources. Additionally, implementation of the Project does not entail activities that would have bearing on the availability of mineral resources. Therefore, the Project would not result in the loss of locally available or important mineral resources or the recovery of such, and no impact would occur.

NO IMPACT

Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of 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?	☐	☐	☐	■
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	■
c. 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?	☐	☐	☐	■

a. *Would the project result in generation of 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*?

b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

c. *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?*

The Project area is undeveloped open space and Project activities do not include construction of any kind. Project activities are limited to the use of hand tools, standard

transport vehicles, and possibly mowing equipment and will be temporary in nature. No Project activities will generate noise beyond regular background levels, and project activities will not create sources of noise that would remain beyond project temporary implementation activities. Project activities will also not cause any groundborne vibration or groundborne noise levels. Additionally, the project area is not located within an airstrip or airport land use Project area, and the closest airport is approximately ten miles from the project area. Therefore, no impact would occur.

NO IMPACT

Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

a. Would the project induce substantial unplanned 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)?

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project area is public conservation land protected from development of housing. Additionally, Project activities do not include construction of any kind. As such, the Project would not induce substantial unplanned population growth, nor would it result in the displacement of people. Therefore, no impact would occur.

NO IMPACT

Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				
1 Fire protection?	☐	☐	☐	■
2 Police protection?	☐	☐	☐	■
3 Schools?	☐	☐	☐	■
4 Parks?	☐	☐	☐	■
5 Other public facilities?	☐	☐	☐	■

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for police protection?

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically

altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

a.4. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks?*

a.5. *Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

As discussed in the preceding section, Population and Housing, the Project would not induce direct or indirect population growth, substantial or otherwise. As such, the proposed project would not result in the need for new or expanded fire protection, police protection, public schools, park facilities, or services beyond existing conditions in the area. Therefore, no impact would occur.

NO IMPACT

Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project 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?	☐	☐	☐	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

a. Would the project 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?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project area consists of undeveloped natural open space that is protected from development of housing and related infrastructure. Additionally, Project activities do not include construction of any kind, nor would they increase usage of existing recreational areas. Project activities are limited to the removal and management of invasive plant species. Therefore, the Project will not increase the use of existing recreational facilities such that physical deterioration would occur, nor would the project require the construction of recreational facilities. Therefore, no impact would occur.

NO IMPACT

Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	■
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision	☐	☐	☐	■
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	■
d. Result in inadequate emergency access?	☐	☐	☐	■

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

d. Would the project result in inadequate emergency access?

The Project area consists of undeveloped natural open space that is protected from development of housing and related infrastructure. It does not contain public transportation infrastructure. Additionally, Project activities do not include construction of any kind. The project area includes unpaved access roads used by land management staff and for emergency access. These vehicle trips would occur regardless of whether the project is

implemented because they are related to maintenance of the designated open space area. No road modifications are proposed in the project. Therefore, no impacts would occur.

NO IMPACT

Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or 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:				
a. 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)?	☐	☐	☐	■
b. 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.	☐	■	☐	☐

Assembly Bill 52 of 2014

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (Public Resources Code Section 21084.3).

Public Resources Code Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and 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

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 these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is 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)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is 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?

A search of archaeological records reveals that numerous cultural resource sites have been identified throughout the Project area. Project activities, however, are not anticipated to cause impacts on these sites because no significant excavation or soil disturbance will occur as part of the project and no changes in use will be made to the project area. There is a remote possibility that objects with cultural value could be discovered during minor surface disturbances caused by hand tools. Contractors will be required to adhere to the following conditions:

TCR-1: Unanticipated Discovery of Tribal Cultural Resources

In the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. All tribes that that had consultation with COSCA shall be contacted to consult if any such find occurs. The archaeologist shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the Lead Agency, and the respective tribes.

TCR-2: Tribal Consultation

The Lead Agency shall, in good faith, consult with any tribe that had consultation with COSCA on the disposition and treatment of any Tribal Cultural Resource encountered during the Project grading.

TCR-3: Tribal Remains

If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human remains are determined to be Native American in origin by the County coroner, the Lead Agency will notify any tribe that had consultation with COSCA.

An invitation for Tribal Consultation was sent to the Barbareno / Ventureno Band of Mission Indians Cultural Resource Department via email on December 12, 2025. No response was received within the 30-day period provided for consultation.

With incorporation of TCR-1 through TCR-3 into project methodology, the potential for impact to tribal cultural resources would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	■
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	■
c. 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?	☐	☐	☐	■
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	■
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	■

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power,

natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c. Would the project 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?

The Project area consists of undeveloped natural open space that is protected from development of housing and related infrastructure, and Project activities do not include construction of any kind. The project will not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. Implementation of Project activities will require only minimal amounts of water that are necessary for mixing herbicide. The project does not require any wastewater service. Therefore, no impacts will occur.

NO IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project would not generate solid waste. However, green waste is expected to be generated during some project activity where biomass removal is a component of a particular management method. This material would be transported to a green waste recycling facility to be composted for beneficial reuse. Project activities, including the removal of biomass are subject to the City of Thousand Oaks' diversion requirements for any debris generated during project implementation. As such, the Project would not generate solid waste in excess of State or local standards, and would comply with federal, State, and local management statutes and regulations. Therefore, no impact would occur.

NO IMPACT

Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. 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?	☐	■	☐	☐
c. 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?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

The Project area consists of undeveloped natural open space that is protected from development of housing and related infrastructure, and Project activities do not include construction of any kind. Invasive plant removal and management efforts that comprise the Project are not anticipated to increase fire severity on their own. However, some invasive plant management methods may incorporate techniques, such as using power hand tools and machinery, that have the potential to ignite dry vegetation. Project activities will include the requirement to adhere to the avoidance measures described below that prohibit

smoking, suspending work during red-flag conditions, and maintaining suppression equipment on-site. Some invasive species, such as giant reed, Mexican fan palm, and Russian thistle are known to increase fire severity and promote the spread of wildfires. Removal of these species is anticipated to reduce fire severity and the rate of fire spread.

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The Project area consists of natural lands located within the very high fire hazard severity zone, and portions of the area lie within the Wildland Urban Interface (WUI). Project activities will include the removal of invasive plant species, some of which contribute to elevated fire hazard. No permanent changes in land use will occur as a function of the project and the project would not substantially impair an adopted evacuation or emergency response plan. Therefore, no impact would occur.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?

The Project area consists of natural lands located within the very high fire hazard severity zone, and portions of the area lie within the Wildland Urban Interface (WUI). Some methods of invasive plant removal, such as using power tools or equipment, have the potential to accidentally ignite dry vegetation and could expose people and structures to risk of loss, injury, or death involving wildland fires. Additionally, the project will result in the removal of invasive plant species, some of which are known to contribute to increased fire hazard severity. It is anticipated that project activities will reduce potential fire severity and exposure to pollutants for nearby communities. The mitigation measures below will be incorporated into project methodology:

FIRE-1: Fire Prevention and Equipment Requirements. Prior to and during all project activities, the project applicant shall implement the following ignition-prevention measures:

a. All project equipment powered by internal combustion engines shall be properly maintained and equipped with spark arresters in compliance with Public Resources Code Sections 4442 and 4443.
b. Construction vehicles shall not be parked over dry vegetation, and idling shall be minimized during fire season (generally May through October).

c. Equipment maintenance, refueling, and staging shall occur only in designated areas cleared of combustible vegetation.

d. Project sites shall maintain readily accessible fire extinguishers on all equipment and at active work areas, and all workers shall receive fire prevention training, including ignition sources, emergency response, and reporting procedures.

FIRE-2: Smoking and Open Flame Restrictions. Smoking shall be prohibited on project sites. Open flames and unauthorized burning shall be strictly prohibited on the project site.

FIRE-3: Fire Weather Restrictions. Construction activities with the potential to generate sparks or heat shall be suspended during Red Flag Warning conditions or other extreme fire weather events, unless otherwise approved in writing by the local fire authority.

FIRE-4: Code Compliance. The project applicant shall comply with all applicable requirements of the California Fire Code and the Ventura County Fire Code.

With implementation of mitigation measures FIRE-1 through FIRE-4, the risk of accidental wildfire ignition associated with construction and operation of the project would be reduced to less-than-significant.

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c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?

The Project area consists of natural lands located within the very high fire hazard severity zone, and portions of the area lie within the Wildland Urban Interface (WUI). The project will not include or require installation or maintenance of any physical infrastructure. Project activities are anticipated to reduce fire severity through the removal of invasive plant species. Therefore, no impact would occur.

NO IMPACT

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Project area consists of natural lands located within the very high fire hazard severity zone, and portions of the area lie within the Wildland Urban Interface (WUI). Project activity consists of removal of individual invasive plants, some of which are known to increase fire hazard severity. No earth movement will be undertaken during project activities and surrounding vegetation will not be impacted. Thus, soil will not be destabilized by project activity, nor will natural drainage be impacted. Therefore, no impact would occur.

NO IMPACT

Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
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, substantially 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?	☐	■	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	■	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	■	☐	☐

a. Does the project 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, substantially 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?

The Project area is located on lands acquired specifically for conservation and the protection of natural resources. The area is recognized to contain sensitive wildlife and flora species and habitats as discussed in the Biological Resources section. However, impacts on the environment have been determined to be less than significant with mitigation. The Project would not cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community. As noted in the Hazardous Materials section, project activities will include the use of herbicides, but with mitigation measures applied, impacts will be less than significant.

The Cultural Resources and Tribal Cultural Resources sections describe the potential for cultural resources to be encountered due to the proposed project. Because project activities would not result in significant soil disturbance, it is unlikely that significant cultural resources would be encountered during project implementation. Nevertheless, because the potential remains that previously undiscovered cultural resources could be exposed. The inclusion of mitigation measures during project activities would ensure that potential impacts to such resources are less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As discussed in the preceding environmental checklist sections, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated for all environmental issues. These include short-term, long-term, and where appropriate, cumulative impacts. Based on the dispersed nature of project activities, temporally limited actions associated with project, and low number of vehicle worker trips, impacts to air quality and GHG emissions would be less than significant when compared to applicable thresholds that consider cumulative impacts. The project would not contribute to cumulative operational noise increases because invasive plant removal actions will be temporary in nature and do not create long-term uses that would generate sound impacts. In addition, as discussed under Transportation, the project would not result in significant VMT related impacts and the project's contribution to cumulative impacts would not be cumulatively considerable.

Certain resource areas (e.g., agriculture and forestry resources, energy, land use, mineral resources, population and housing, and public services) were determined to result in no

impact in comparison to existing conditions. Therefore, the project would not contribute to cumulative impacts related to these issues. Other issues (e.g., geology and soils, and hazards and hazardous materials) are by their nature project-specific and impacts at one location do not add to impacts at other locations or create additive impacts. In addition, the project would not generate substantial population growth in exceedance of regional and City forecasts; therefore, it would not contribute to cumulative increases in demand for utilities such as water, wastewater, and solid waste service. Accordingly, the project's contribution to cumulative impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Project area is located within designated open space and is substantially surrounded by designated open space, and the project does not involve any construction or development, so no human impacts related to energy, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and utilities and service systems will result. The Project has the potential for accidental ignition of wildfire in the Project area that could migrate to nearby homes. With mitigation measures, however, potential impacts would be less than significant.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

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