

# CALIFORNIA ENVIRONMENTAL QUALITY ACT EXEMPTION ANALYSIS

## PROJECT DESCRIPTION

The Town of Los Gatos (Town) Roadway Vegetation Management Project (Project) will remove hazardous vegetation and create defensible space around approximately 31.09 miles of Town-owned hillside roadways that have been identified by the Town and Town residents as roadways of high concern (Figure 1). These town-owned roadways<sup>1</sup> include evacuation routes and other collector, neighborhood, and hillside collector roads that are located within the wildland urban interface (WUI) and/or are have been identified by the Town and Town residents as having inadequate access for emergency response during a wildfire.

Under the project, work will focus on removing roadside vegetation to create a clear space that is 20 feet wide and 13 feet, 6 inches above roadways, as well as clearance of non-fire-resistant vegetation within 10 feet of the roads. Clearing these areas will not only improve emergency vehicle access and evacuation safety, but will also reduce the amount of heat that evacuating residents might be exposed to during a fire, improve visibility, and expand the usable width of roadways on narrow hillside streets.

The Town will work with private contractors annually to inspect and clear vegetation along the roadways. Clearing activities will include:

- Cutting back or removing vegetation and tree limbs that encroach into the roadway to create at least 20 feet of horizontal clearance.
- Removing low hanging tree limbs that extend over the roadway to create at least 13 feet, 6 inches of vertical clearance.

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<sup>1</sup> Although private roadways are not included in this project the Town has identified a limited number of private roadways where vegetation management is recommended. The Town will communicate with property owners on these private roadways regarding associated risks and recommendations for vegetation management to be completed by the property owners.

- Removing all non-fire-resistant vegetation located within 10 feet of the roadways. Vegetation to be removed includes, but is not limited to, combustible vegetation such as Eucalyptus (*Eucalyptus* sp.) trees, acacia (*Acacia* sp.) trees, scotch broom (*Cytisus scoparius*), French broom (*Genista monspessulana*), and toyon (*Heteromeles arbutifolia*).
- Creating vertical spacing between trees and shrubs by removing vegetation that provides ladder fuels such as low branches and other understory shrubs within 10 feet of the roadways.
- Removing tree limbs and low branches on mature trees within 10 feet horizontal of the edges of the roadways to 6-10 feet vertical above the ground, and at least 13 feet, 6 inches vertical above road surfaces to allow for emergency vehicle access.
- Removing trees that are on steep slopes leaning at angles that could fall and block a roadway.
- Redwoods should be left in place unless thinning of small saplings is required.
- String-trimming groundcover, such as grasses, to achieve a height of 4 inches or less within 10 feet of the roadways.
- Coordinate the removal of vegetation entangled in overhead wires. The Town is not responsible for directly removing vegetation from overhead wires<sup>2</sup>. However, any required removal of vegetation entangled in overhead wires will be coordinated with PG&E. Private contractors will prune the balance of any trees partially pruned by PG&E outside of the 10-foot safety zone.
- Coordinate with property owners along private roadways where additional vegetation management is recommended. While these private roadways are not a part of this project, the Town will communicate with these property owners regarding associated risks and recommendations for vegetation management to be completed by the property owners.

The Town has identified three priority levels of roadways where vegetation management for fire safety is of utmost concern. These levels are based on Vegetation Management Action Levels (VMAL) which are defined by the amount of vegetation encroachment into and along the edges of the roadway. Existing VMAL's along roadways of high concern were identified and mapped during a reconnaissance-level survey

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<sup>2</sup> The Town and/or its contractors must remain a minimum of 10 feet from energized conductors and cannot remove any vegetation that is entangled in overhead wires. Therefore, removal of vegetation entangled with overhead wires will be coordinated with PG&E. The Town and/or contractors will also coordinate with PG&E where vegetation treatment creates risk of limbs falling onto wires and lane/road closures for vegetation management activities. Private contractors will prune the balance of any trees partially pruned by PG&E outside of the 10-foot safety zone.

by SWCA Environmental Consultants biologists and arborist in June and July 2020 (Figure 2). Specifically, these levels are defined as:

- VMAL 1. High level of encroachment of roadside vegetation. Typically includes areas of dense native woodland vegetation with canopy overhanging the roadway. Vegetation often entangled in overhead wires. Pockets of dense flammable non-native invasive vegetation (e.g., acacia, broom) in the understory on hillslopes adjacent to roadways.
- VMAL 2. Moderate encroachment of roadside vegetation. Some areas of dense native woodland as in VMAL1. Additional areas of native scrub vegetation on open hillsides with non-native annual grasses. Pockets of dense flammable non-native invasive vegetation (e.g., acacia, broom) in the understory on hillslopes adjacent to roadways.
- VMAL 3. Minimal encroachment of roadside vegetation<sup>3</sup>. Urban streetscape within the WUI that contains irrigated ornamental/landscaped non-native vegetation. VMAL 3 roads are typically adjacent to the Town center with wide streets and sidewalks. Vegetation often entangled in overhead wires at point of connection to adjacent structures.

Based on these VMAL designations and an updated fuel model and hazard assessment, the Town has prioritized project roadways into three levels as follows (Figure 3):

- Priority Level 1: Priority 1 roadways include evacuation routes within the Town with VMAL 1 and VMAL 2 designations. Vegetation management along these roads is essential to ensuring emergency vehicles can access locations along these roads and ensuring the safety of residents as they evacuate in the event of a wildfire.
- Priority Level 2: Priority 2 roadways include roadways identified by the Town as high priority roadways that are not specifically identified as evacuation routes, but may require improvements to allow safe and efficient emergency vehicle access and resident evacuation, and have been identified as VMAL 1 and VMAL 2. These roads need work to meet Los Gatos Municipal Code and other relevant requirements and ensure the safety of Town residents in the event of a wildfire. Priority 2 roadways also include arterial and collector streets with a VMAL 1 and VMAL 2 designations.
- Priority Level 3: Priority 3 roadways have some vegetation encroachment that could increase the intensity of a fire and/or increase wildfire spread. Priority 3 roadways have been identified as any roads that are within the WUI with a VMAL 3 designation. These roads generally meet Los Gatos Municipal Code and other requirements and are not expected to need immediate or regular routine vegetation maintenance to meet requirements. These roads should be inspected

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<sup>3</sup> VMAL 3 roads outside the WUI were removed from the project since these roads generally meet the Los Gatos Municipal Code and other relevant requirements and are not expected to require vegetation maintenance to ensure the safety of Town residents and emergency vehicles can access locations along the roadways in the event of a wildfire.

every few years to ensure they do not need vegetation maintenance to comply with fire requirements, such as the Los Gatos Municipal Code.

## PROJECT PURPOSE

The objective of the project is to ensure Town roadways are consistent with the Government Code 51175-51189, the Town Municipal Code, and Santa Clara Fire Department access road standards, to support safer evacuation routes for residents and emergency response vehicles by creating a fuel break along evacuation routes and other roads within the Town in the event of a wildfire.<sup>4, 5, 6</sup>

The combination of increasing development in or near wildlands, the accumulation of wildland fuels, a drying and warming climate, longer fire seasons, and rugged terrain has resulted in significant wildfire risk to communities located in or near the WUI. The WUI area is best described as a wildland-urban intermix with homes scattered amongst wildland fuels. The Town WUI planning area includes primarily Very High Fire Hazard Severity Zone areas, as defined by CalFire and the Town of Los Gatos Fire Prevention and Protection Ordinance.<sup>7</sup> A Community Wildfire Protection Plan (CWPP) was prepared for the County of Santa Clara.<sup>8</sup> Annex 9 of the CWPP (updated in 2019) addressed specific wildlife prevention and mitigation for the Town and identified the need for removal of obstructions on road systems for evacuation (Strategic Goal FC-8) and a roadside fuel treatment program (Strategic Goal FR-7).<sup>9</sup> This Vegetation Management Plan (VMP) is being prepared to address those needs.

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<sup>4</sup> Town of Los Gatos. 1996. *Town of Los Gatos Municipal Code. Chapter 9. Fire Prevention and Protection.* Available at: [https://library.municode.com/ca/los\\_gatos/codes/code\\_of\\_ordinances?nodeId=CO\\_CH9FIPRPR](https://library.municode.com/ca/los_gatos/codes/code_of_ordinances?nodeId=CO_CH9FIPRPR). Accessed July 28, 2020.

<sup>5</sup> Santa Clara County Fire Department. 2009. *Standard Details & Specifications. Fire Department Apparatus Access.* Available at: [https://www.sccfd.org/images/documents/fire\\_prevention/standards/2.4.6\\_fire\\_department\\_apparatus\\_access.pdf](https://www.sccfd.org/images/documents/fire_prevention/standards/2.4.6_fire_department_apparatus_access.pdf). Accessed July 28, 2020.

<sup>6</sup> Town of Los Gatos. 2020. *Ordinance 2301. Ordinance of the Town of Los Gatos Amending Chapter 9 (Fire Prevention and Protection) of the Town Code Regarding Weed Abatement Regulations.* Available at: <https://www.losgatosca.gov/DocumentCenter/View/24284/Ord-2301---Amend-Chapter-9-Fire-Prevention--Protection-regarding-Weed-Ab>. Accessed August 21, 2020.

<sup>7</sup> Town of Los Gatos. 2009. *Very High Fire Hazard Areas Map.* Available at: <https://www.losgatosca.gov/DocumentCenter/View/24122/Los-Gatos-WUI-and-State-VHFHA-Map?bidId=>. Accessed July 28, 2020.

<sup>8</sup> Santa Clara County. 2009. *Santa Clara County Community Wildfire Protection Plan.* Available at: <https://www.sccfd.org/santa-clara-county-community-wildfire-protection-plan>. Accessed Jul 28, 2020.

<sup>9</sup> Santa Clara County. 2009. *Santa Clara County Community Wildfire Protection Plan. Annex 9.* Available at: <https://www.sccfd.org/santa-clara-county-community-wildfire-protection-plan>. Accessed Jul 28, 2020.

State law designates all lands within the Town as a Local Responsibility Area (LRA) for the purposes of wildland fire protection.<sup>10</sup> Therefore, areas within the Town are required to maintain defensible space as outlined in Government Code 51175-51189 and Los Gatos Municipal Code Chapter 9. As a result, all fire apparatus access roads are required to have an unobstructed width of no less than 20 feet, exclusive of shoulders, or as required by fire department access road standards, and an unobstructed vertical clearance of 13 feet, 6 inches. In addition, all areas within 10 feet of fire apparatus roads and driveways are required to be cleared of non-fire-resistant vegetation growth. The Santa Clara Fire Department access road standards also include the following requirements:

- The minimum clear width of fire department access roads shall be 20 feet. Modifications to the design or width of a fire access road, or additional access road(s) may be required when the fire code official determines that access to the site or a portion thereof may become compromised due to emergency operations or nearby natural or manmade hazards (flood prone areas, railway crossings, bridge failures, hazardous material-related incidents, etc.).
- The width of secondary access roads may be reduced to less than 20 feet provided turnouts are installed adjacent to the roadway every 500 feet with a minimum dimension of 10 feet wide and 40 feet long or as otherwise determined by the fire code official.
- Vertical clearance over required vehicular access roads and driveways shall be 13 feet, 6 inches.<sup>11</sup>

## SITE DESCRIPTION

The project will take place in the Town of Los Gatos. Under the project, work will focus on roadside vegetation to achieve a clearance of 20 feet horizontally and 13 feet, 6 inches above roadways, as well as clearance of non-fire-resistant vegetation within 10 feet of the roads. The Town is located at the base of the Sierra Azules in the southwestern portion of Santa Clara County, where the Santa Clara Valley meets the lower slopes of the Santa Cruz Mountains. The Town encompasses a wide variety of terrain ranging from flat topography at the edge of the valley floor to densely wooded hillsides.

The Town includes a range of vegetation types with various fuel hazards. Chaparral vegetation is often found on the south facing slopes of the Town. Chaparral will have long flame lengths under either moderate or extreme weather conditions and burn quickly and intensely. Oak (*Quercus* sp.) woodlands,

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<sup>10</sup> CalFire. 2008. *Very High Fire Hazard Severity Zones in LRA Map. Los Gatos*. Available at: [https://osfm.fire.ca.gov/media/5932/los\\_gatos.pdf](https://osfm.fire.ca.gov/media/5932/los_gatos.pdf). Accessed July 28, 2020.

<sup>11</sup> Santa Clara County Fire Department. 2009. *Standard Details & Specifications. Fire Department Apparatus Access*. Available at: [https://www.sccfd.org/images/documents/fire\\_prevention/standards/2.4.6\\_fire\\_department\\_apparatus\\_access.pdf](https://www.sccfd.org/images/documents/fire_prevention/standards/2.4.6_fire_department_apparatus_access.pdf). Accessed July 28, 2020.

comprised of a variety of oak species, are also interspersed throughout the Town as well as mixed conifer comprised of knob cone pine (*Pinus attenuata*) and grey pine (*Pinus sabiniana*). A fire ignited in either the oak woodland or mixed conifer habitat would likely burn as a surface fire with fairly low rates of spread, although active fire behavior is possible in some patches, especially under extreme weather conditions. A limited number of conifers such as redwoods (*Sequoia sempervirens*) and Douglas fir (*Pseudotsuga menziesii*) are located at lower elevations in the Town where precipitation is high, fog is common, and temperatures are moderate. Fire spread is generally limited in this fuel type; however, given the right combination of weather conditions, surface fire can be expected to burn uphill. Vegetation found along main roadways include planted street trees (e.g., elm [*Ulmus* spp.], ash [*Fraxinus* spp.], sweet gum [*Liquidambar* spp.], pine [*Pinus* spp.], palm [*Arecaceae*]), blue gum eucalyptus [*Eucalyptus globulus*], Monterey pine [*Pinus radiata*]), a wide variety of ornamental species, as well as some natives.<sup>12</sup>

The foothills above Los Gatos have steep, winding, and narrow roads that pose potential ingress and egress problems for emergency response and evacuations. Entrapment is also a concern due to minimal turnaround space and dead ends associated with many of the roadways. The surrounding vegetation is a mixture of dense conifer/oak woodland forests that encroach within a few feet of the roadside pavement. These forests have accumulated dead and downed wood, invasive species along the roadsides, brush and other vegetation that has been exposed to drought stress, and ongoing mortality from sudden oak death. The potential for wildfire to spread from roadside vegetation to adjacent properties or vice-versa is very high; therefore, immediate implementation of this project is necessary to protect the Town and critical power and water infrastructure. This project will also ensure that adequate evacuation routes exist within the Town for residents and tourists, and that roads are suitable for emergency response vehicle access in case of a wildfire.

## VEGETATION MANAGEMENT TECHNIQUES

All removed vegetation will be cut with hand tools (e.g., chainsaws, polesaws, machetes, string trimmers), where possible, to minimize ground disturbance. A crane and bucket truck will be required to access more difficult sites. Cut vegetation will be dragged onto the nearest roadway and chipped on-site or loaded into dump trucks for chipping off-site. All supporting vehicles and heavy equipment will remain on roadways or designated staging areas. Removal and disposal of any invasive species will be completed in accordance with California Invasive Plant Council (CAL-IPC) guidelines and methodologies.

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<sup>12</sup> Santa Clara County. 2009. *Santa Clara County Community Wildfire Protection Plan*. Available at: <https://www.sccfd.org/santa-clara-county-community-wildfire-protection-plan>. Accessed Jul 28, 2020.

**Dead Vegetation.** All downed dead trees and shrubs will be removed if they are not rotten and are not yet embedded into the ground. Downed trees that are embedded in soil and which cannot be removed without soil disturbance will be left in place.

**Limb and Maintain Trees.** Remove lower limbs of conifers (pine, fir, cedar, etc.) so that no leaves or needles are within 13 feet, 6 inches of the roadway, 10 feet of the ground outside the roadway, or 1/3 the height of the tree if it is less than 30 feet tall. Space trees so that the canopies do not touch, with added space between fire prone species like conifers. Trees like oaks, bay, and ornamentals with broad leaves should be limbed so that no branches are within 13 feet, 6 inches of the roadway, six feet of the ground outside the roadway, or 1/3 height of the tree if it is less than 18 feet tall. Areas with greater fire hazards, such as steeper slopes, or more severe fire danger will require greater pruning heights. In areas with steeper slopes, fires can jump and move laterally between tree crowns or the upper portion of the tree. For example, in areas categorized as VMAL 1, slopes are generally steeper and vegetation denser, requiring greater pruning heights to prevent or slow the speed at which a fire could travel between crowns. Plant spacing guidelines with specific slope ratios can be found below in Table 1.

Remove all surface fuels greater than 4 inches in height. Single specimens of trees, shrubs, or other vegetation may be retained provided they are well-spaced, well-pruned, and create a condition that avoids spread of fire to other fuel types or to a structure.

Buffer distances between vegetation will depend on the slope, vegetation size, vegetation type (brush, grass, trees), and other fuel characteristics (fuel compaction, chemical content, etc.). Areas with greater fire hazards will require greater buffers between fuels. For example, areas on steep slopes having large sized vegetation will require greater spacing between individual trees and bushes. Groups of vegetation (numerous plants growing together less than 10 feet in total foliage width) may be treated as a single plant. For example, 3 individual manzanita plants growing together with a total foliage width of 8 feet can be “grouped” and considered as one plant and spaced accordingly. See Table 1. Plant Spacing Guidelines, below.

**Table 1. Plant Spacing Guidelines**

Trees	Minimum horizontal space from edge of one canopy tree to the edge of the next	
	Slope	Spacing
	0% to 20%	10 feet
	20% to 40%	20 feet
	Greater than 40%	30 feet

Shrubs	Minimum horizontal space between edges of shrubs	
	0% to 20%	2 times the height of the shrub
	20% to 40%	4 times the height of the shrub
	Greater than 40%	6 times the height of the shrub
Vertical Space	Minimum vertical space between top of shrub and bottom of lower tree branches is 3 times the height of the shrub	

Adapted from Gilmer, M. 1994. *California Wildfire Landscaping*.

**Equipment and Machinery**

A variety of equipment may be utilized to cut and remove vegetation. Table 2 below shows a list of the possible equipment that may be used.

**Table 2. Equipment List**

Description	
Crane	Wood Chipper
Bucket Truck	Dump Truck
Chainsaw	String Trimmer
Polesaw	Machete

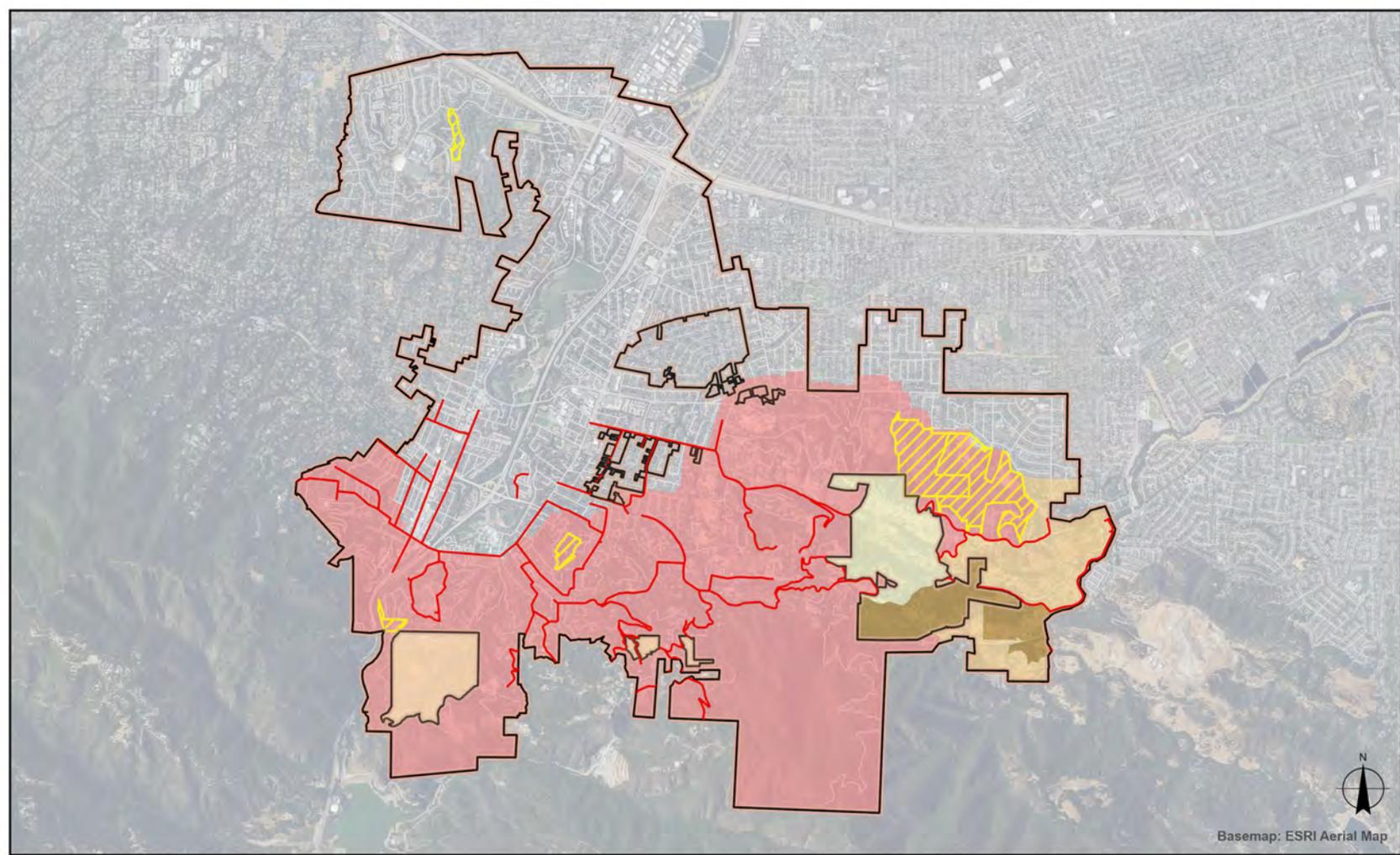
**Access**

Access to all work areas will be from existing surface streets. No work will be conducted within the bed or bank of California Department of Fish and Wildlife (CDFW) jurisdictional areas. No vehicles or equipment will enter creek channels.

**Schedule**

The Town of Los Gatos will coordinate their vegetation management activities to commence as soon as possible and occur before the peak of the 2020 fire season (fall).

**Figure 1: Project Location**



Basemap: ESRI Aerial Map



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Scale: 1:62,758



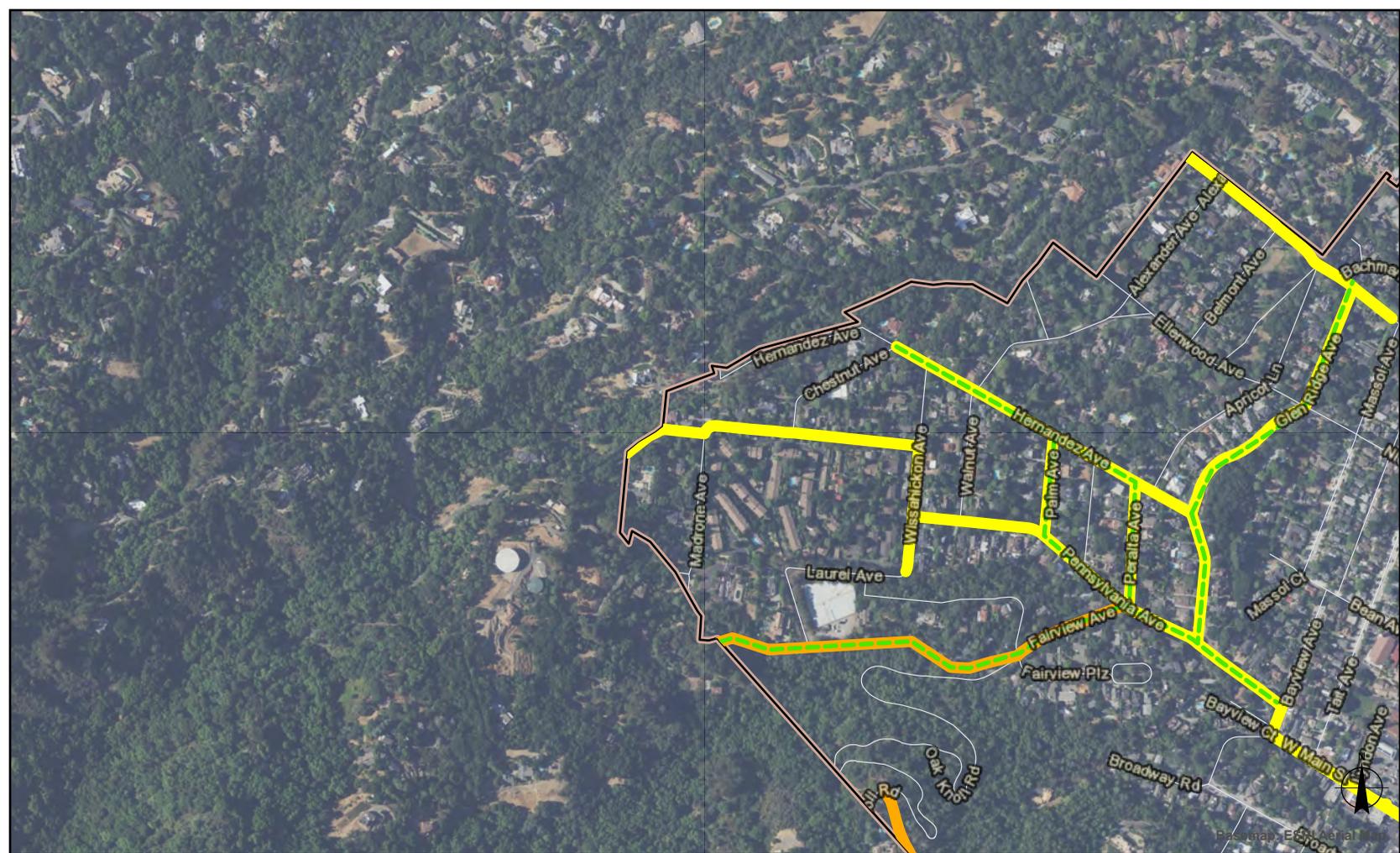
-  Town of Los Gatos Boundary
-  Open Space Area
-  Roadways of High Concern
-  Other Roadways

**Very High Fire Hazard Area**

-  State mandated LRA (VHFHA)
-  Town of Los Gatos Designated (WUIFA)
-  State Mandated Pre-Zone (VHFHA)
-  Pre-Zoned Town Designated (VHFHA)



**Figure 2: Roadway Vegetation Management Action Levels (VMAL's)**



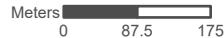
Base map: ESRI Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

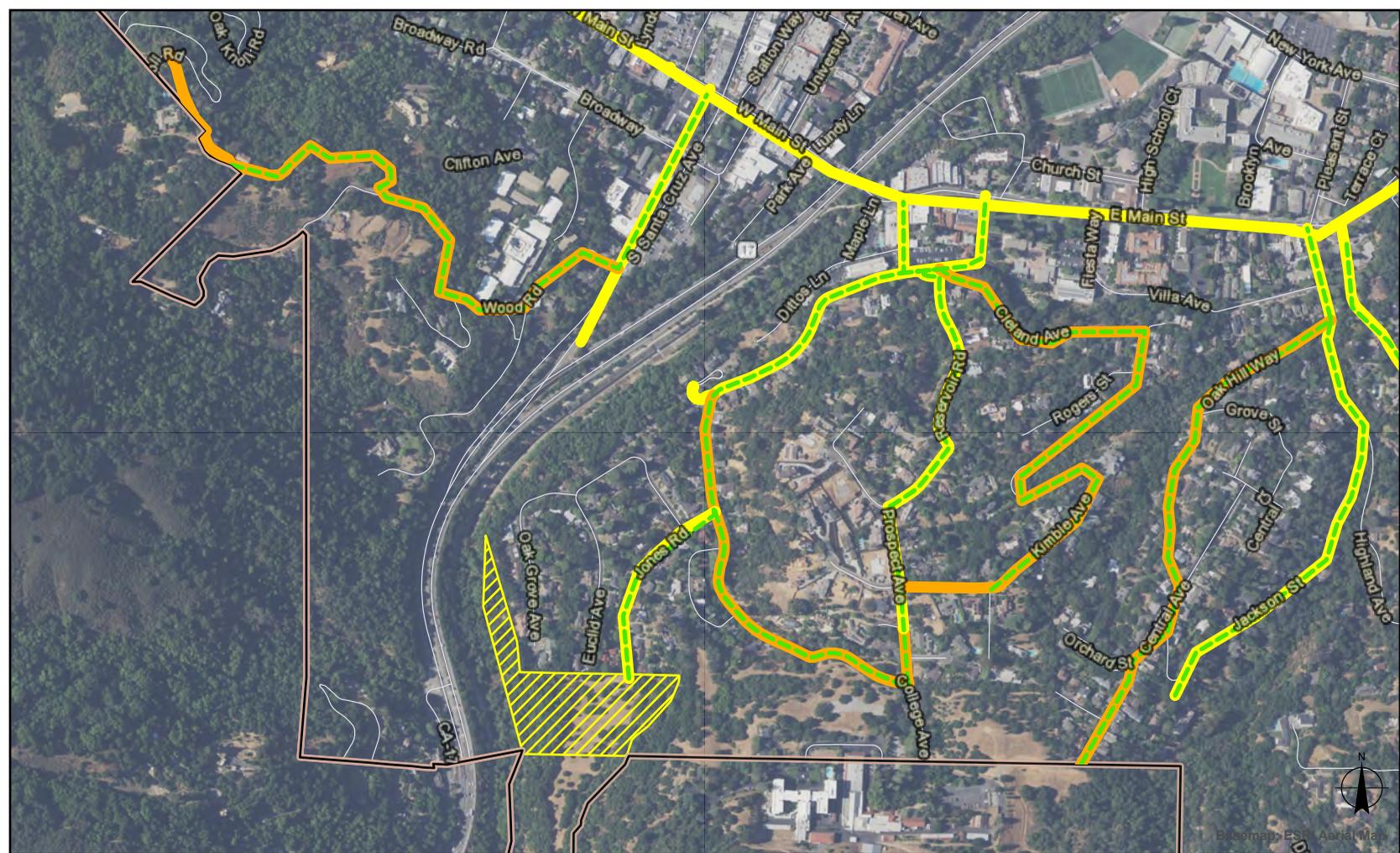
**Vegetation Management Action Levels**

-  VMAL 1 (5.30 Miles)
-  VMAL 2 (13.98 Miles)
-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

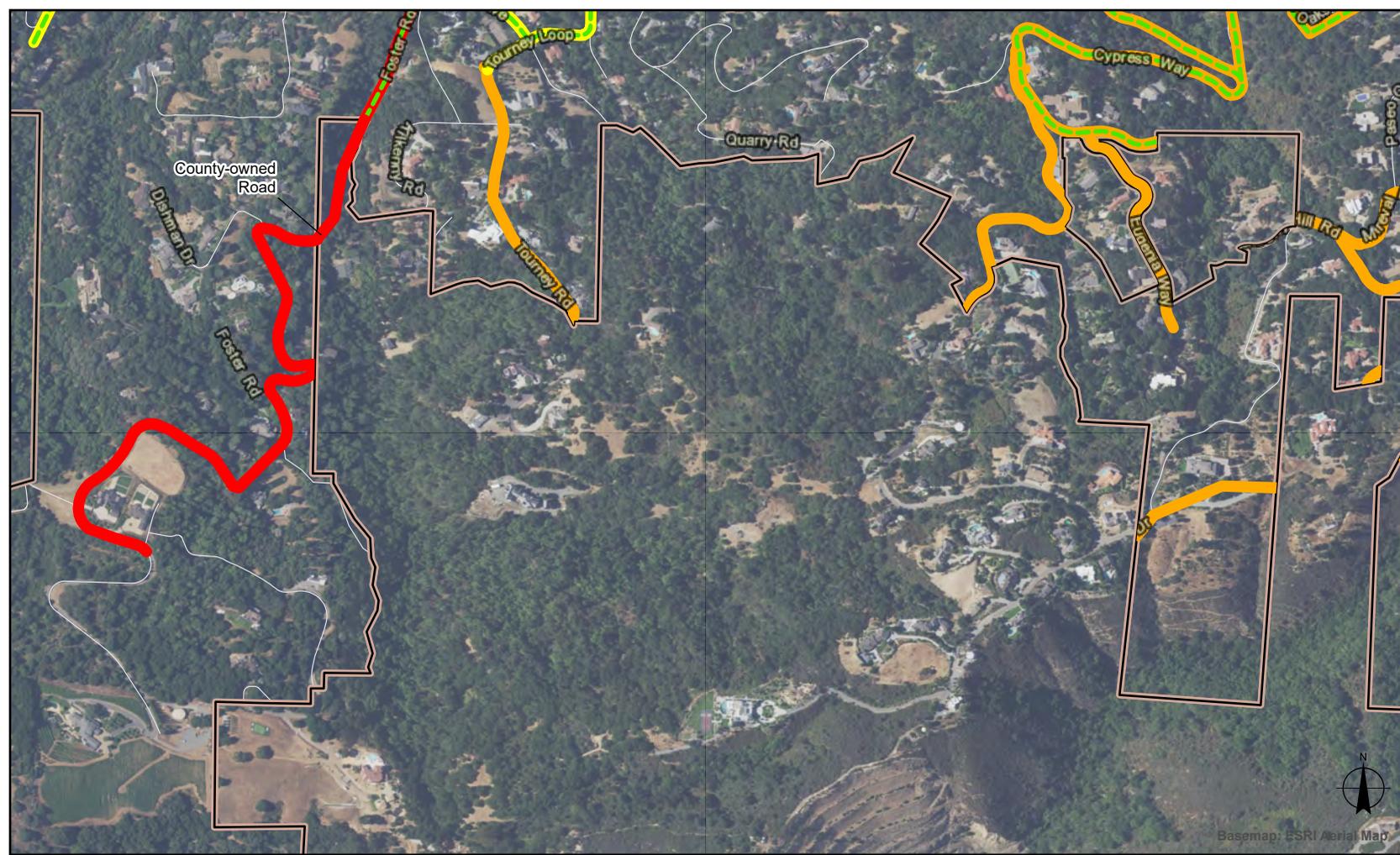
**Vegetation Management Action Levels**

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-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





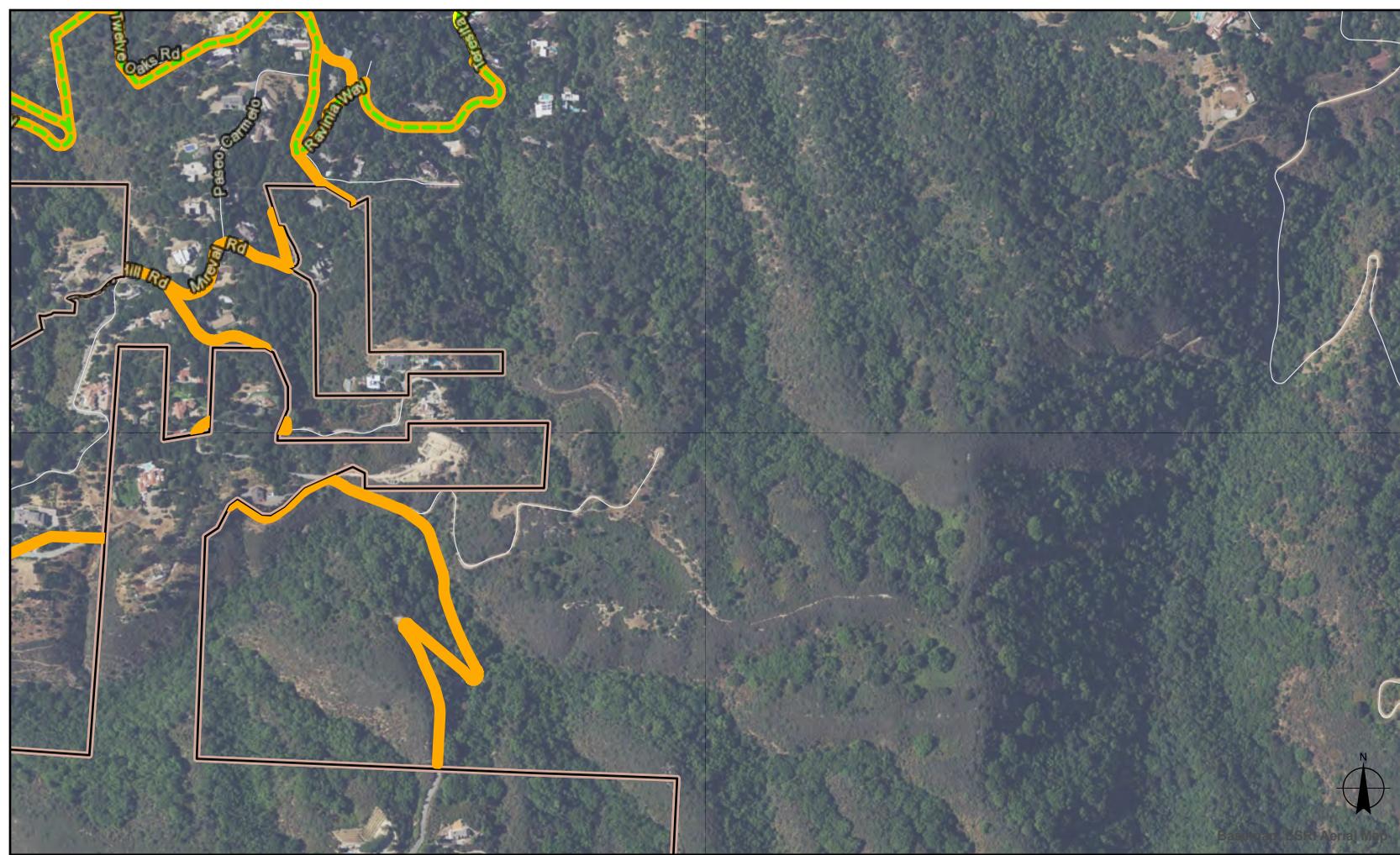
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-  Other Roadways

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Scale: 1:9,000





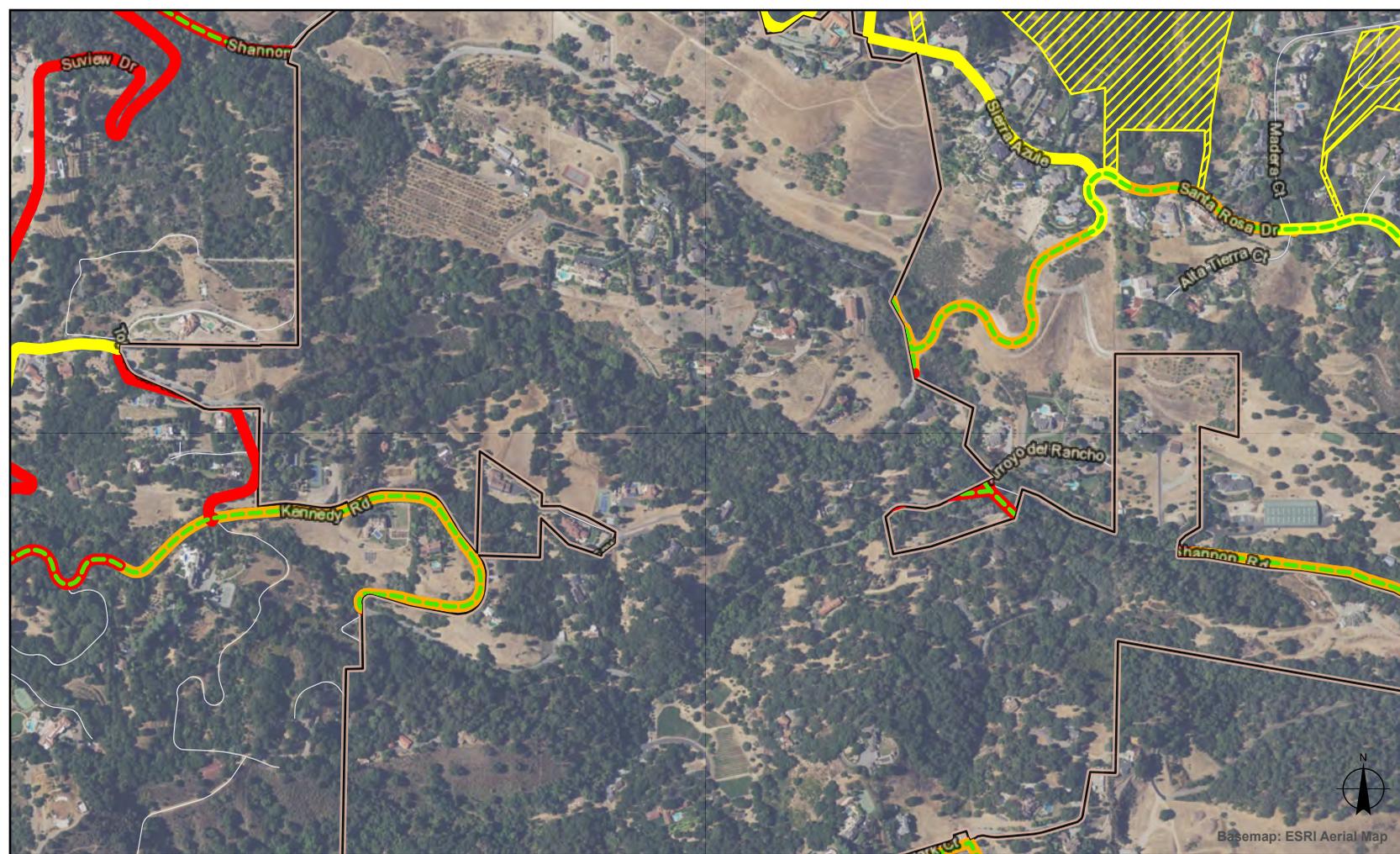
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Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Vegetation Management Action Levels**
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  -  VMAL 3 (11.81 Miles)



Scale: 1:9,000





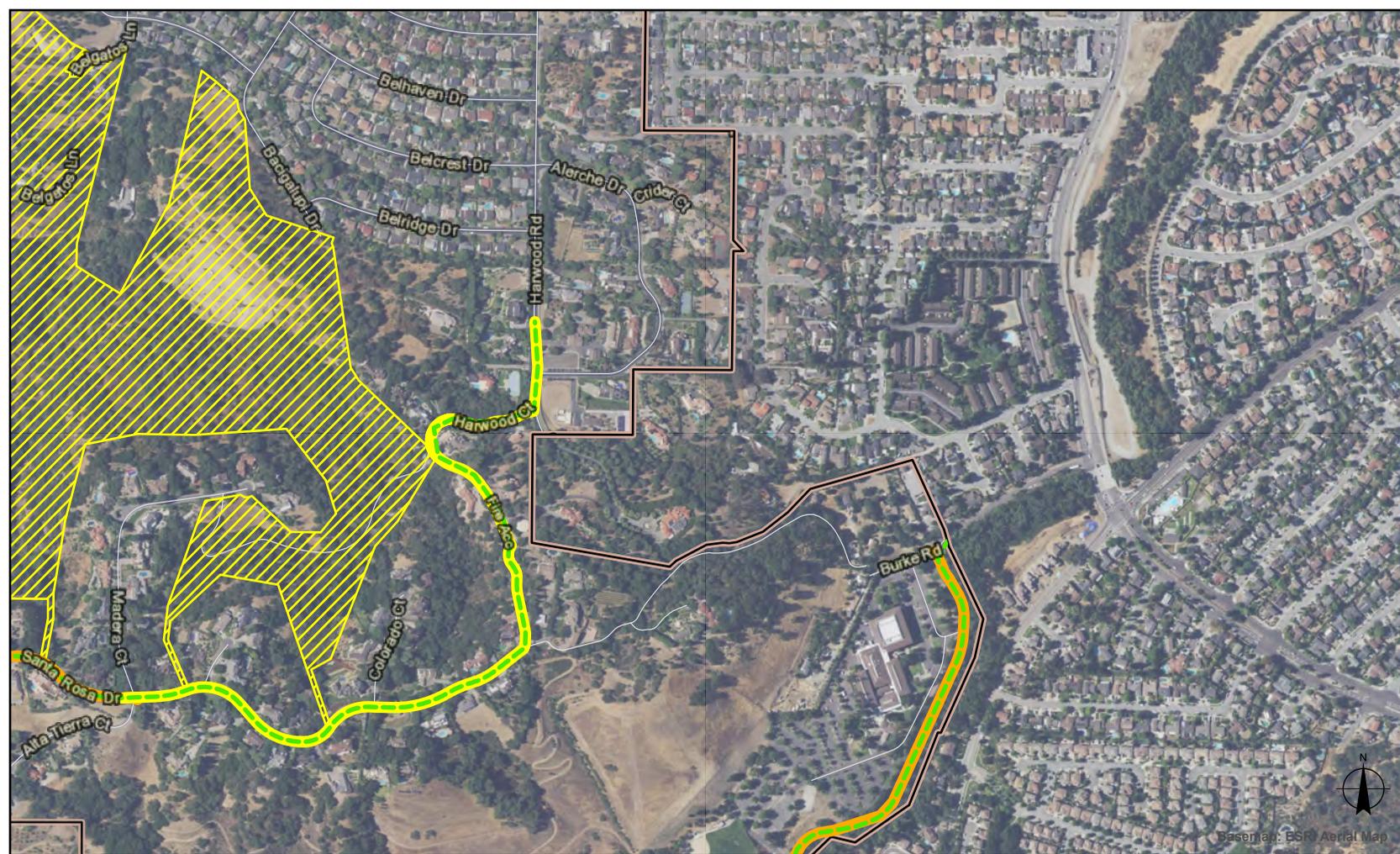
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- Other Roadways

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  - VMAL 3 (11.81 Miles)



Scale: 1:9,000





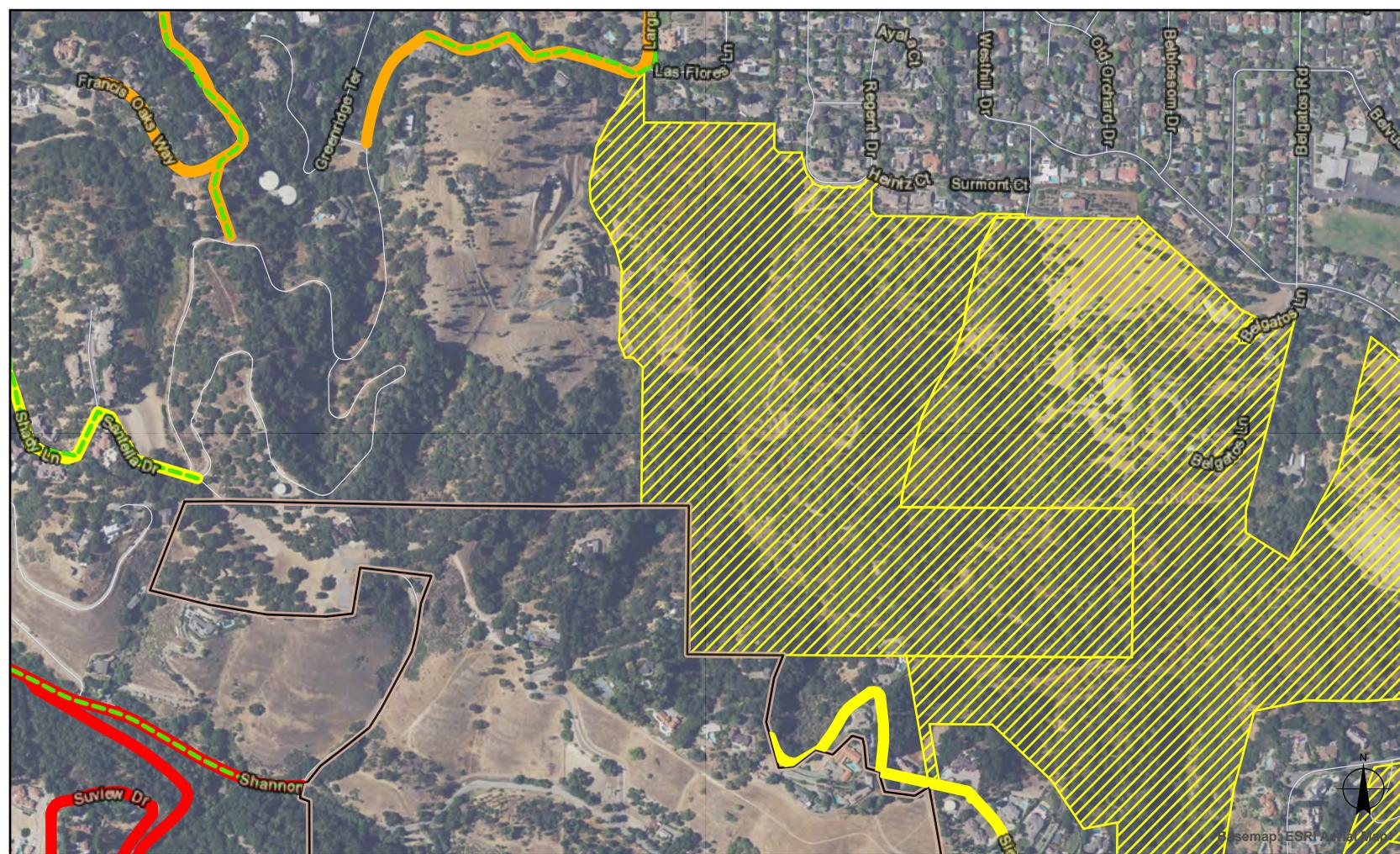
- Town of Los Gatos Boundary
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- Evacuation Routes
- Other Roadways

- Vegetation Management Action Levels**
- VMAL 1 (5.30 Miles)
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  - VMAL 3 (11.81 Miles)



Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

**Vegetation Management Action Levels**

-  VMAL 1 (5.30 Miles)
-  VMAL 2 (13.98 Miles)
-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





Base Map: USGS Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

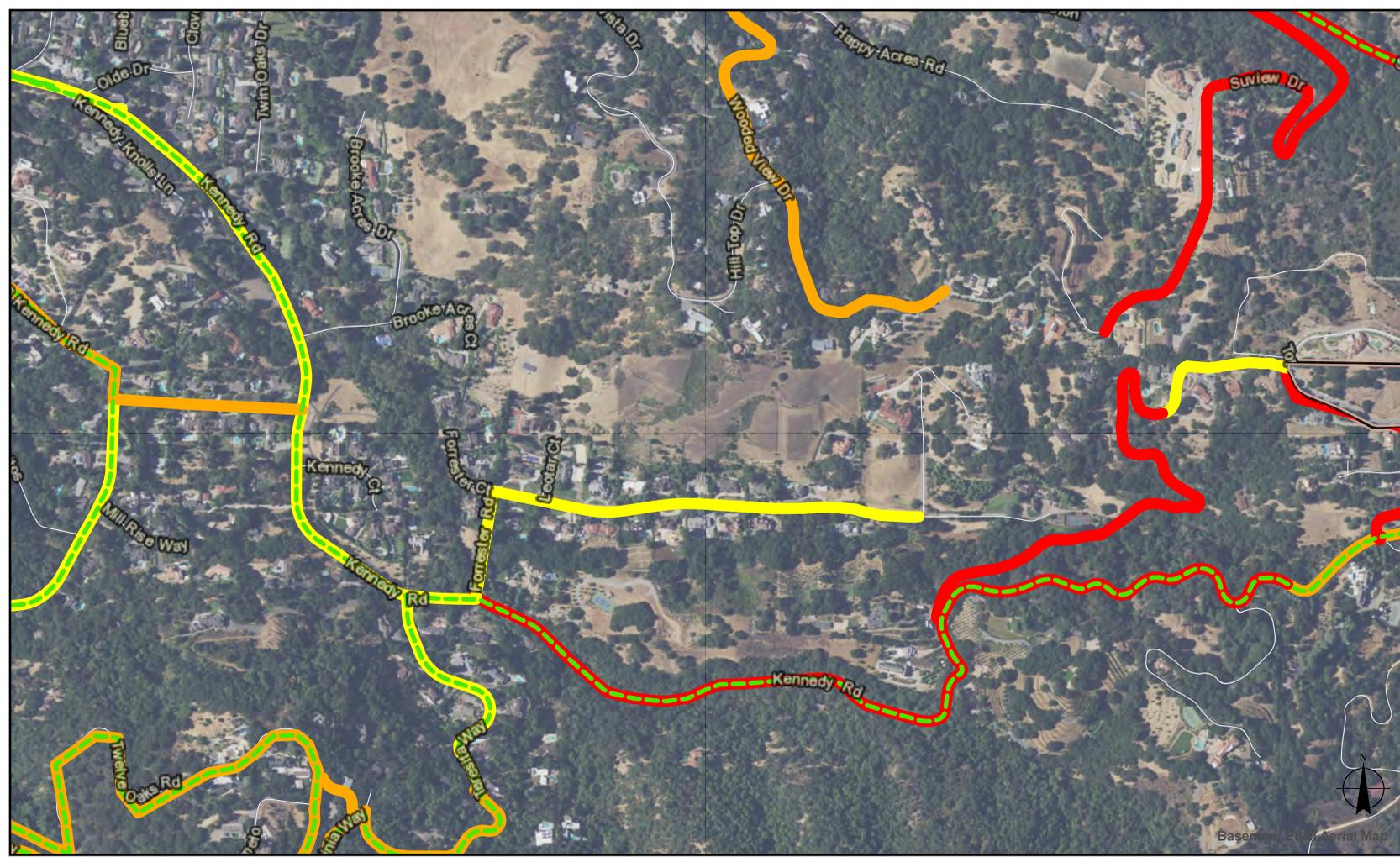
**Vegetation Management Action Levels**

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-  VMAL 2 (13.98 Miles)
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Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

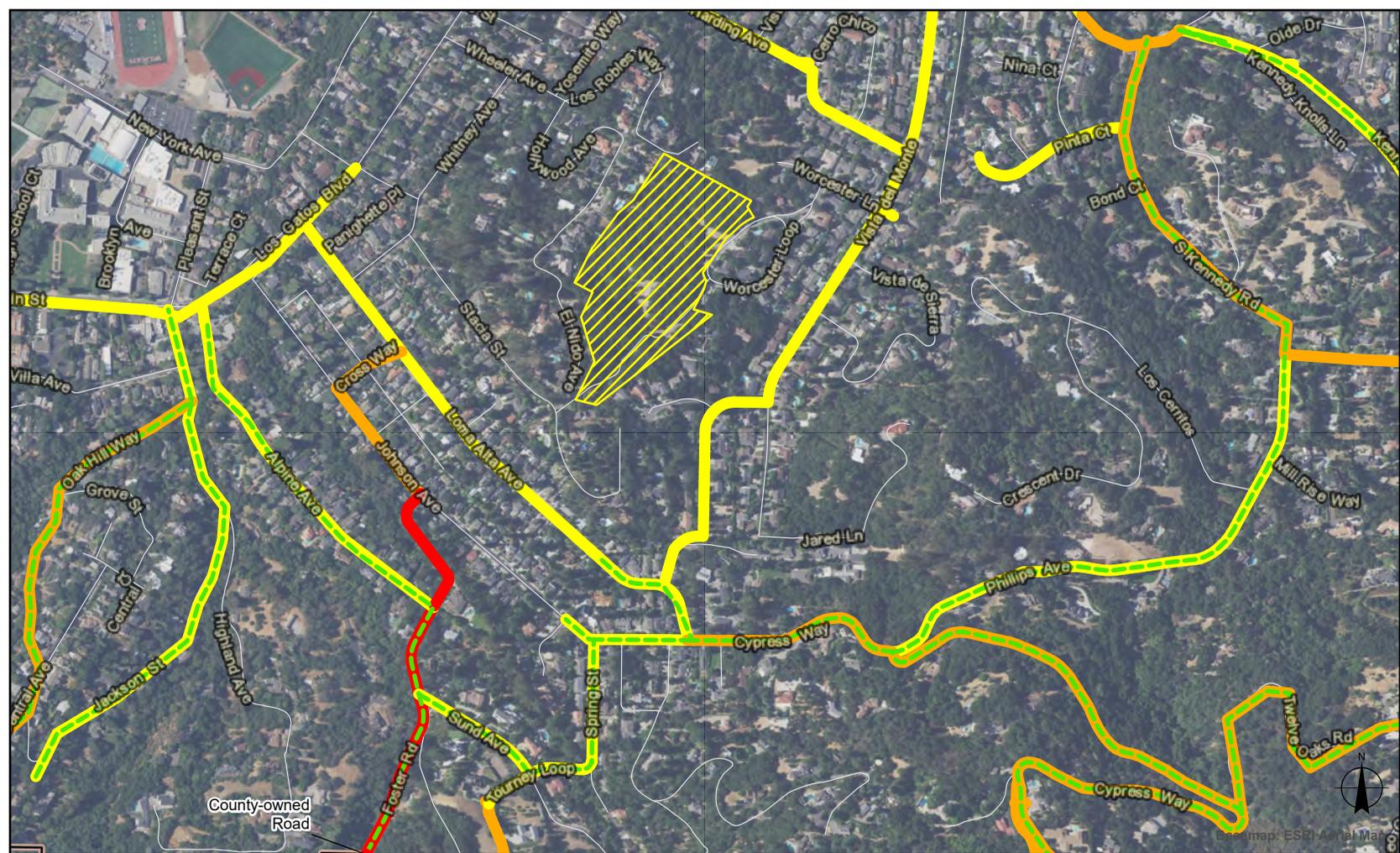
**Vegetation Management Action Levels**

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-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

**Vegetation Management Action Levels**

-  VMAL 1 (5.30 Miles)
-  VMAL 2 (13.98 Miles)
-  VMAL 3 (11.81 Miles)



Meters  0 87.5 175

Scale: 1:9,000

**SWCA**  
ENVIRONMENTAL CONSULTANTS



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

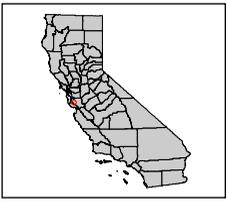
**Vegetation Management Action Levels**

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-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





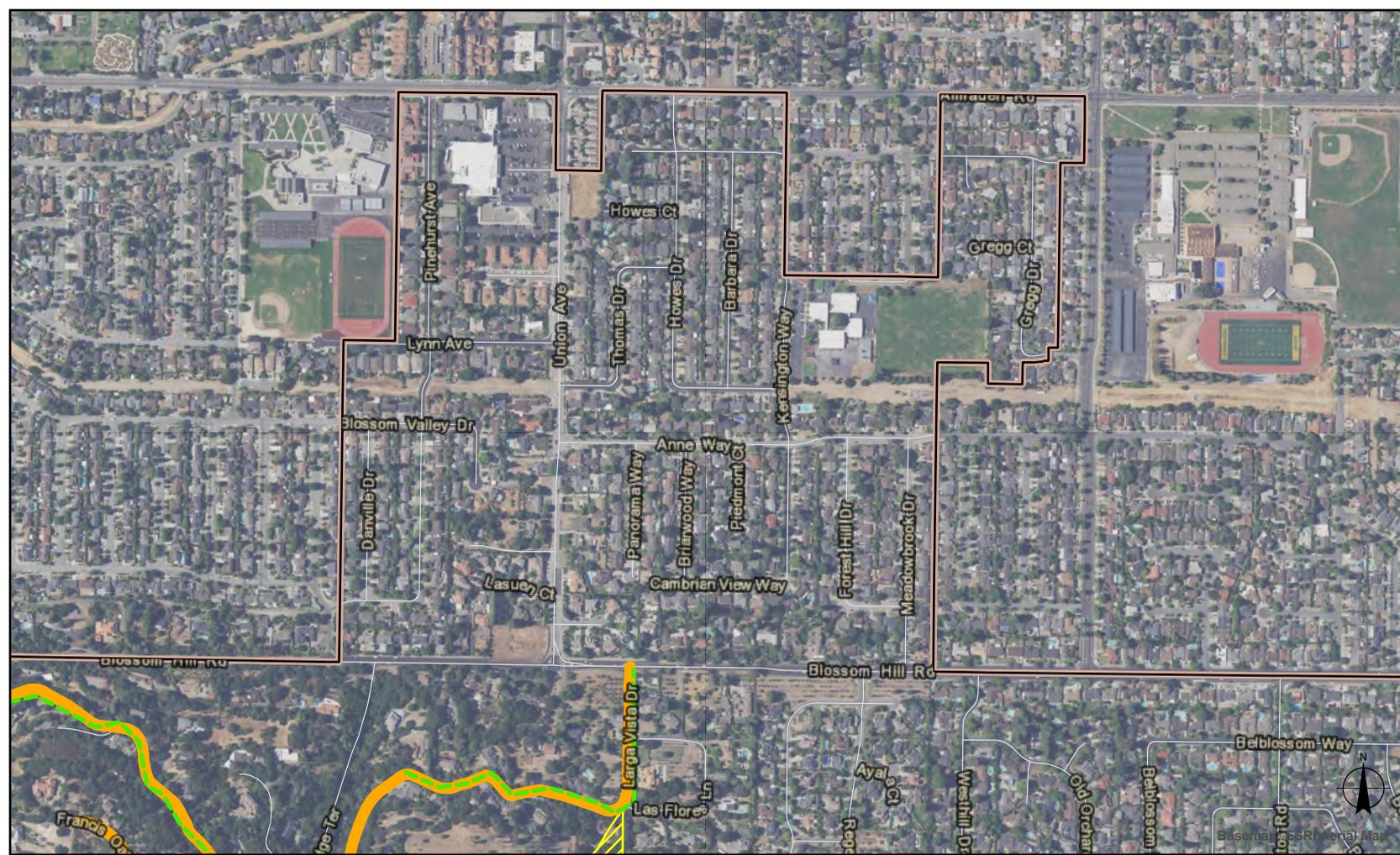
- Town of Los Gatos Boundary
- Open Space Area
- Evacuation Routes
- Other Roadways

- Vegetation Management Action Levels**
- VMAL 1 (5.30 Miles)
  - VMAL 2 (13.98 Miles)
  - VMAL 3 (11.81 Miles)



Scale: 1:14,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

**Vegetation Management Action Levels**

-  VM1 (5.30 Miles)
-  VM2 (13.98 Miles)
-  VM3 (11.81 Miles)



Scale: 1:9,000





Basemap: ESRI Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

**Vegetation Management Action Levels**

-  VMAL 1 (5.30 Miles)
-  VMAL 2 (13.98 Miles)
-  VMAL 3 (11.81 Miles)



Scale: 1:9,000





- Town of Los Gatos Boundary
- Open Space Area
- Evacuation Routes
- Other Roadways

**Vegetation Management Action Levels**

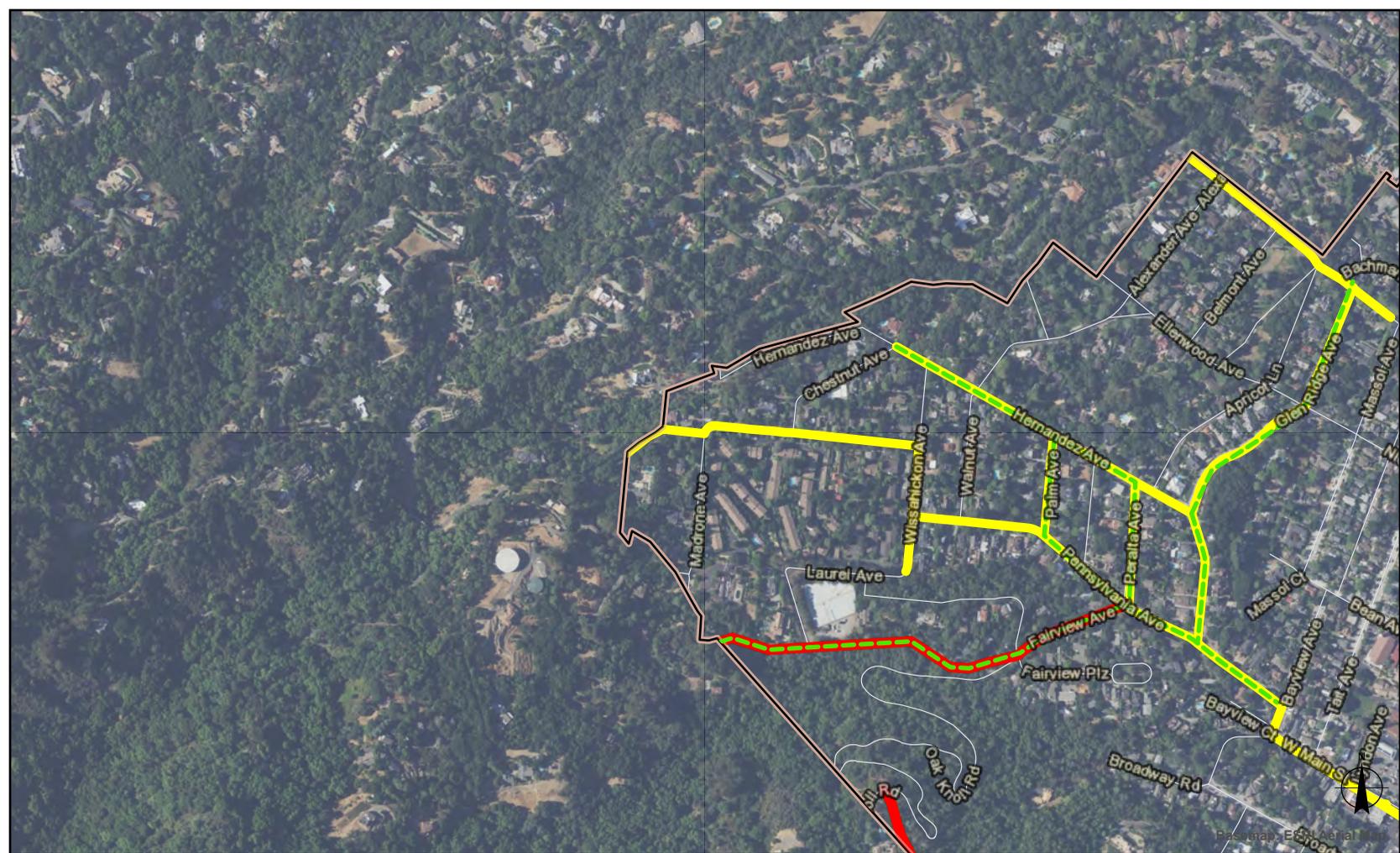
- VMAL 1 (5.30 Miles)
- VMAL 2 (13.98 Miles)
- VMAL 3 (11.81 Miles)



Scale: 1:28,000



**Figure 3: Roadway Priority Levels**



Base map: ESRI Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

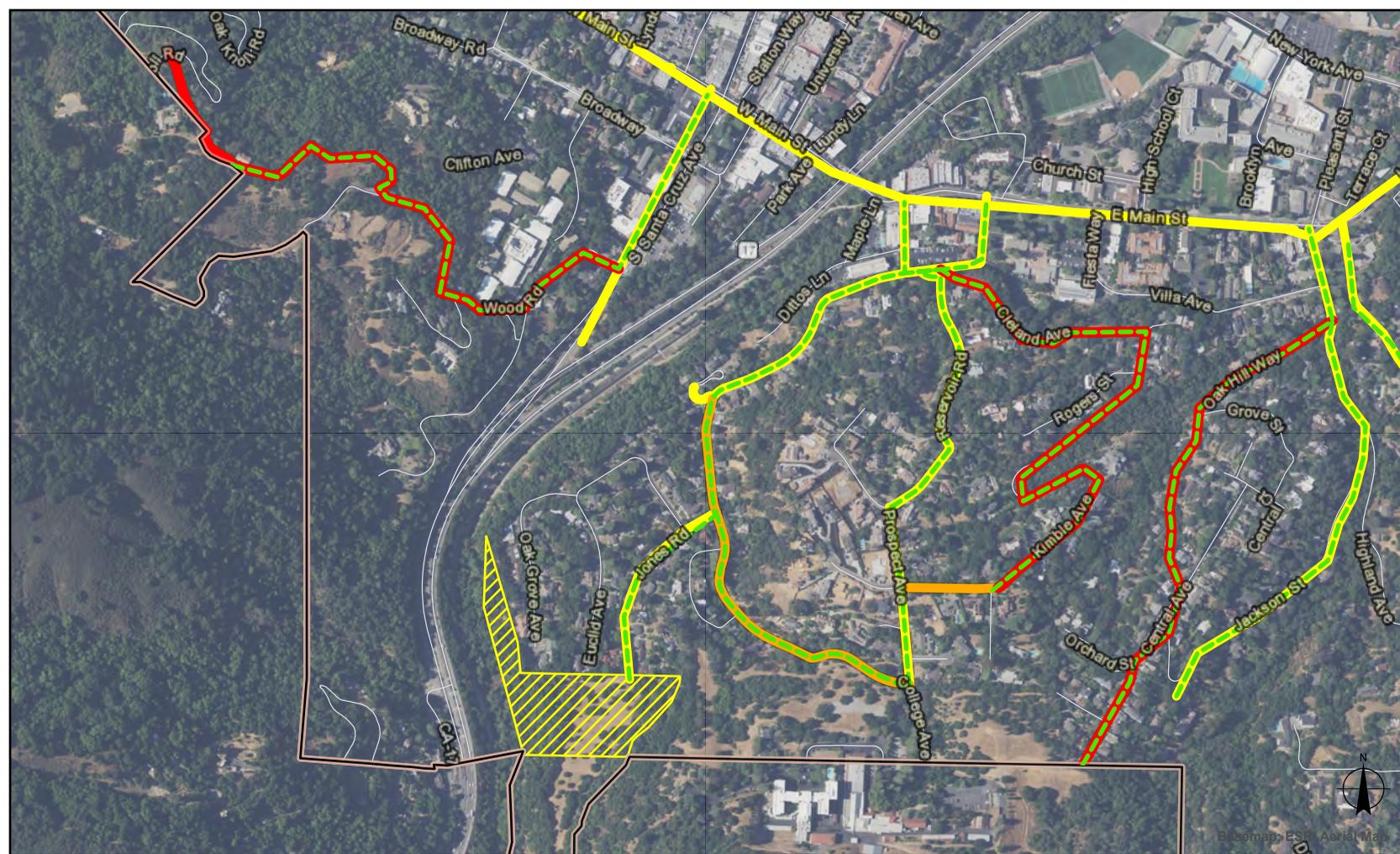
**Priority Levels**

-  Level 1 (11.26 Miles)
-  Level 2 (7.38 Miles)
-  Level 3 (12.45 Miles)



Scale: 1:9,000





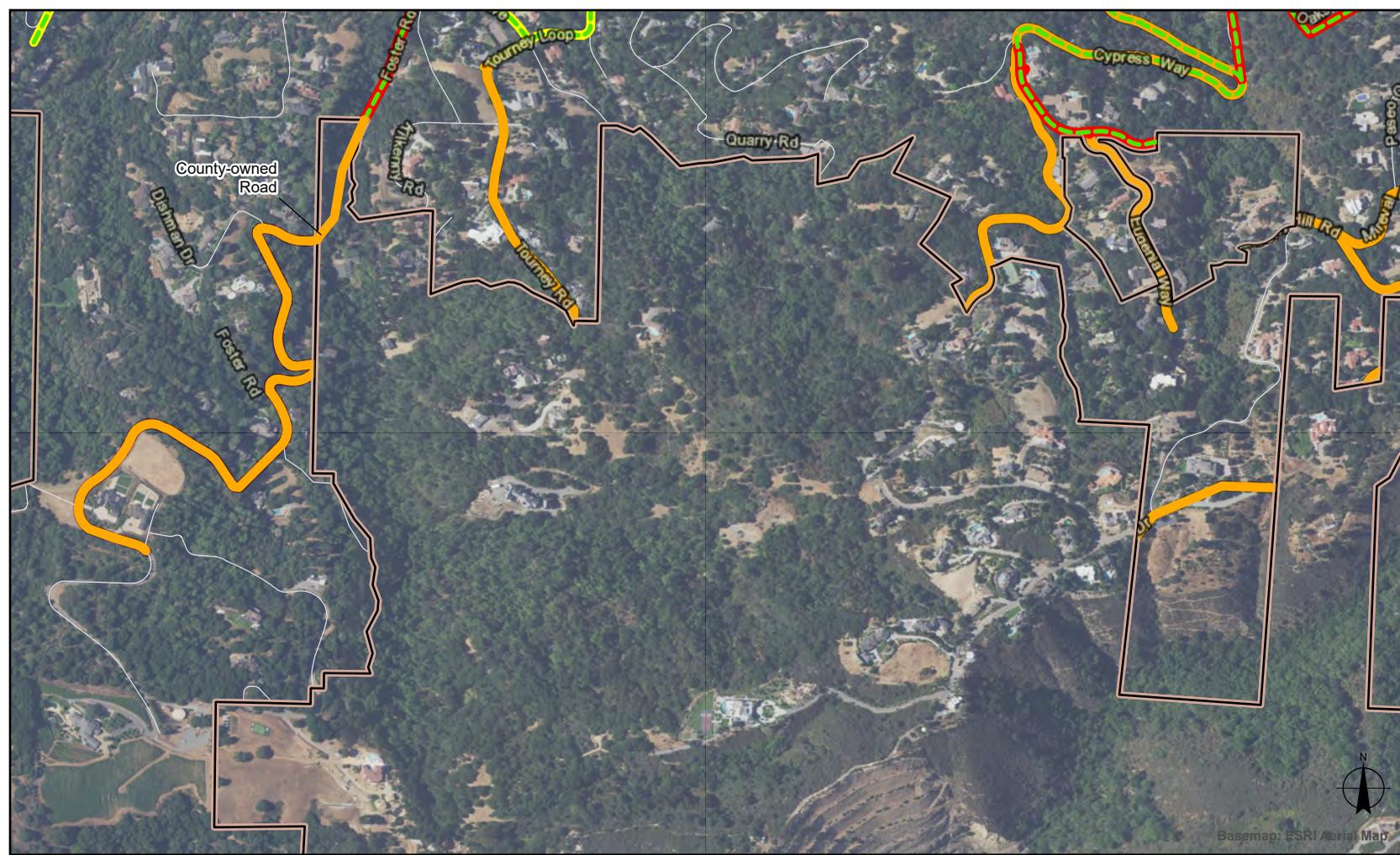
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





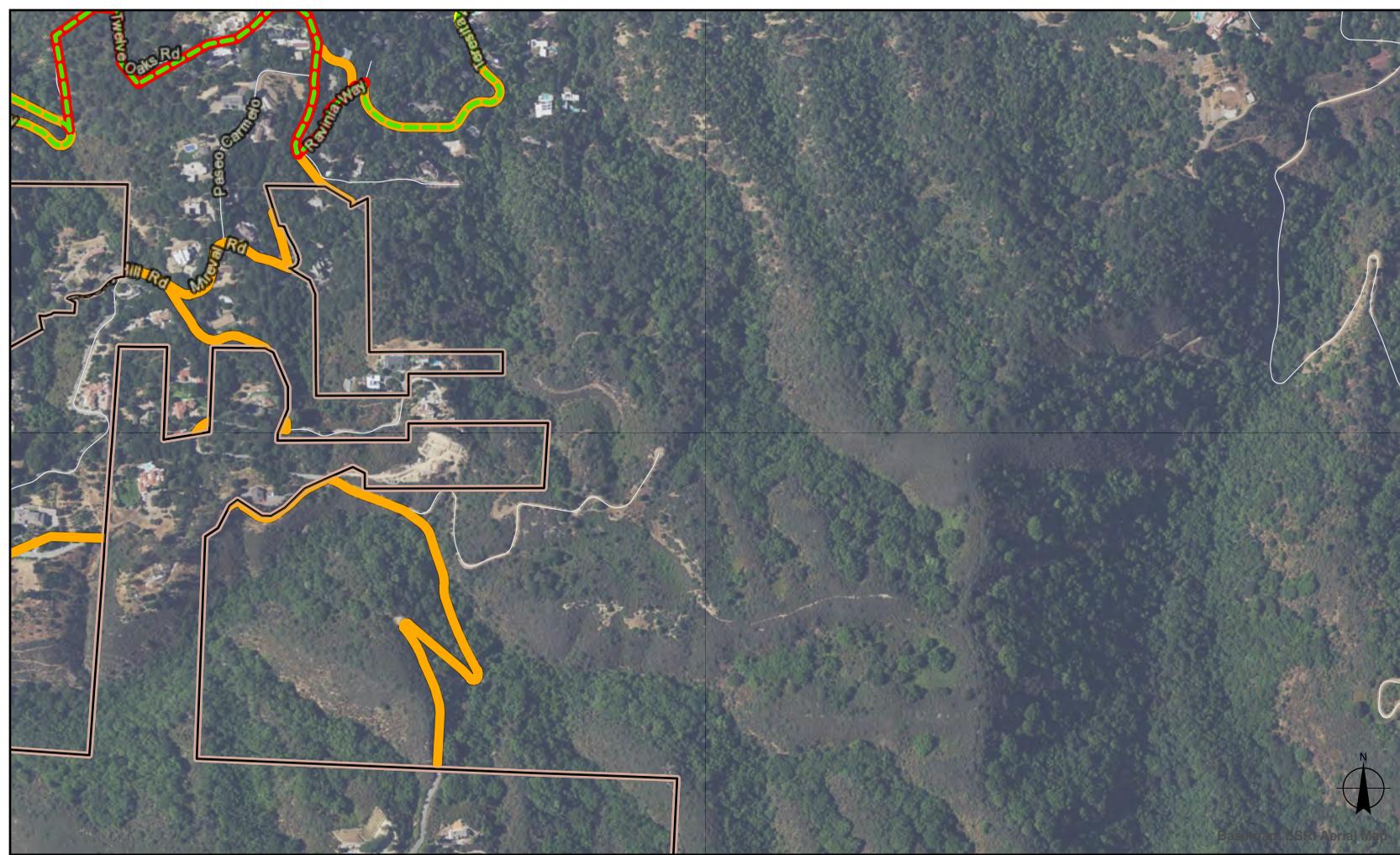
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





Basemap: ESRI Aerial Map



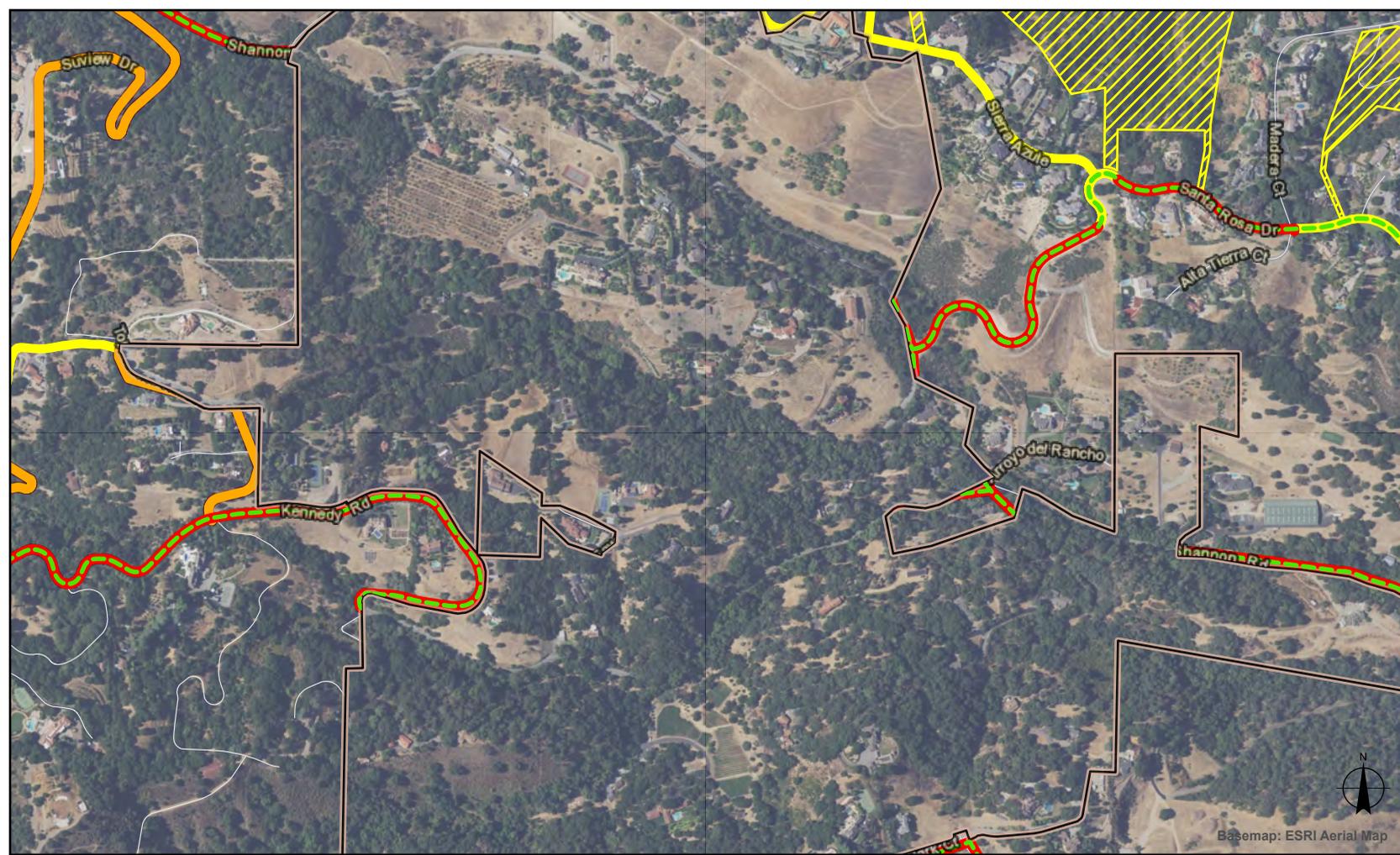
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





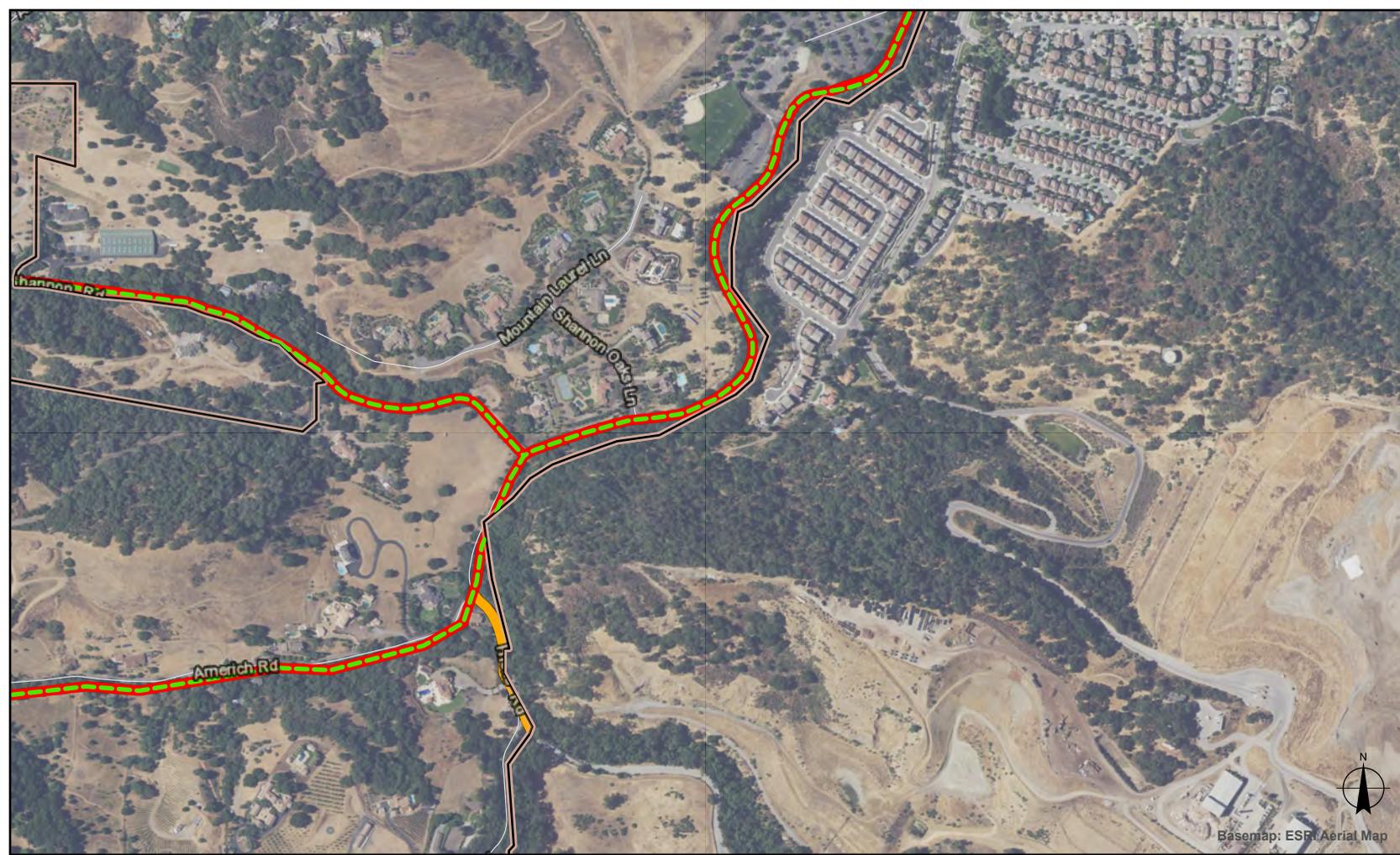
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





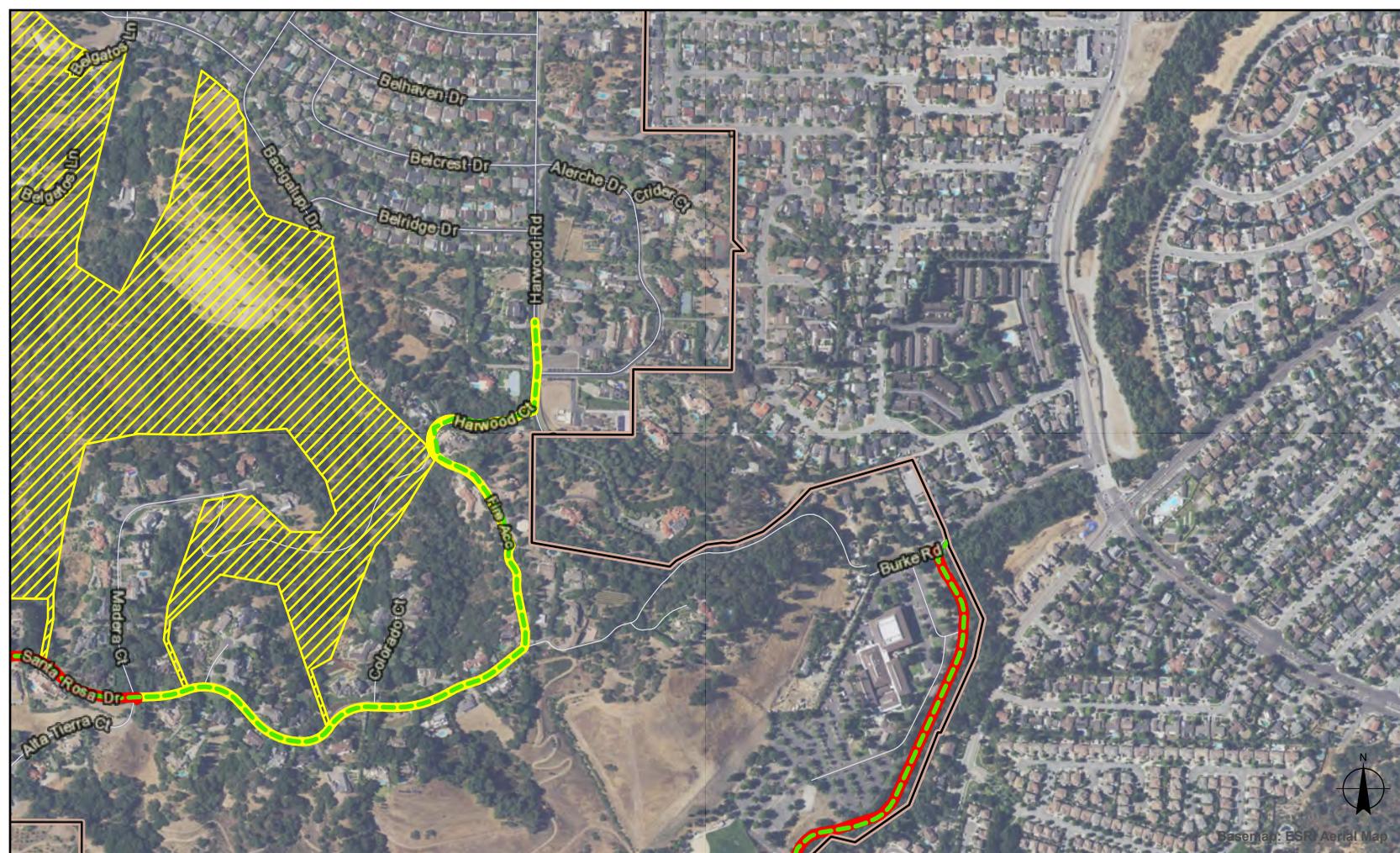
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





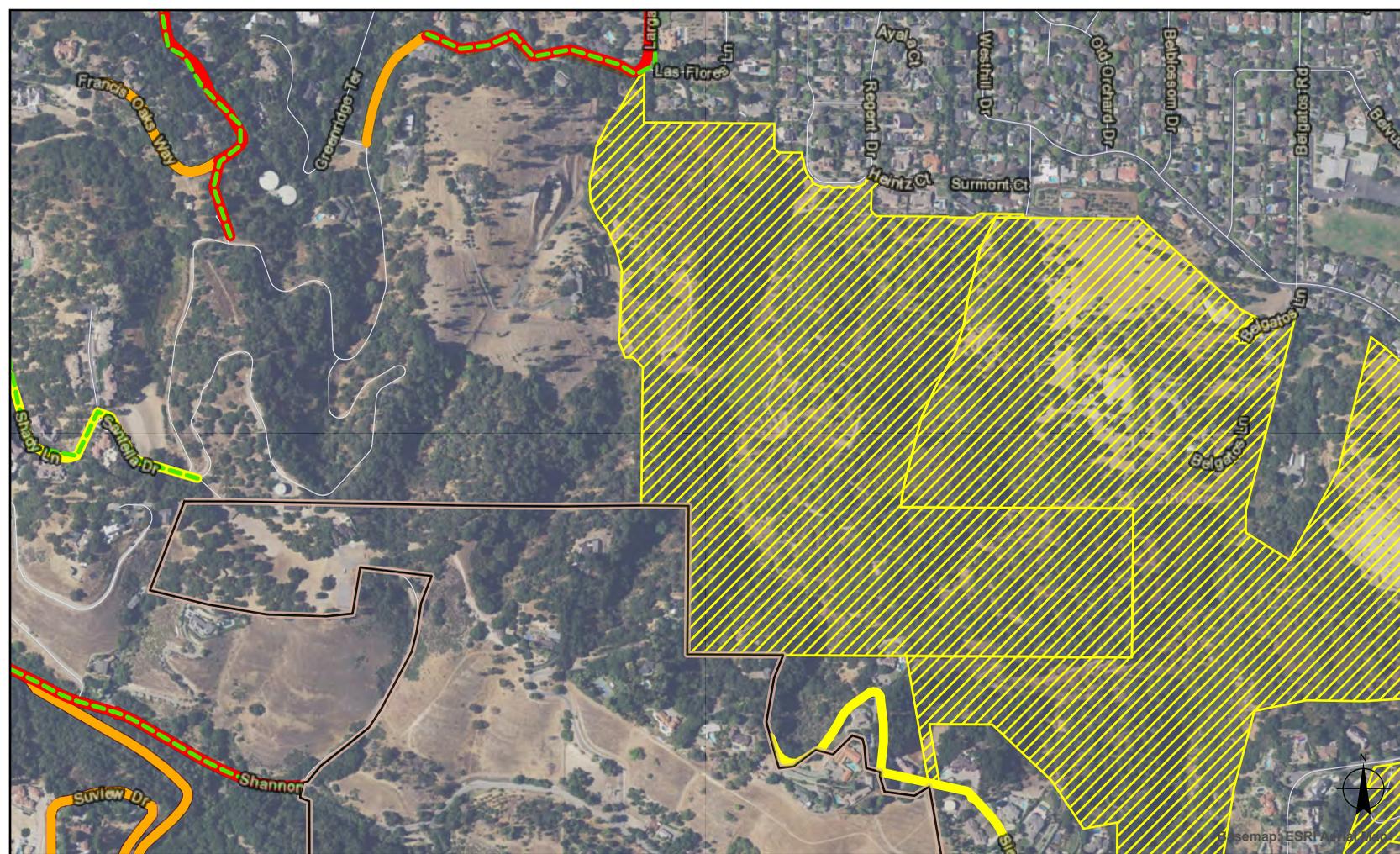
- Town of Los Gatos Boundary
- Open Space Area
- Evacuation Routes
- Other Roadways

- Priority Levels**
- Level 1 (11.26 Miles)
  - Level 2 (7.38 Miles)
  - Level 3 (12.45 Miles)



Scale: 1:9,000





Base map: ESRI Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





Base Map: ESRI Aerial Map



-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

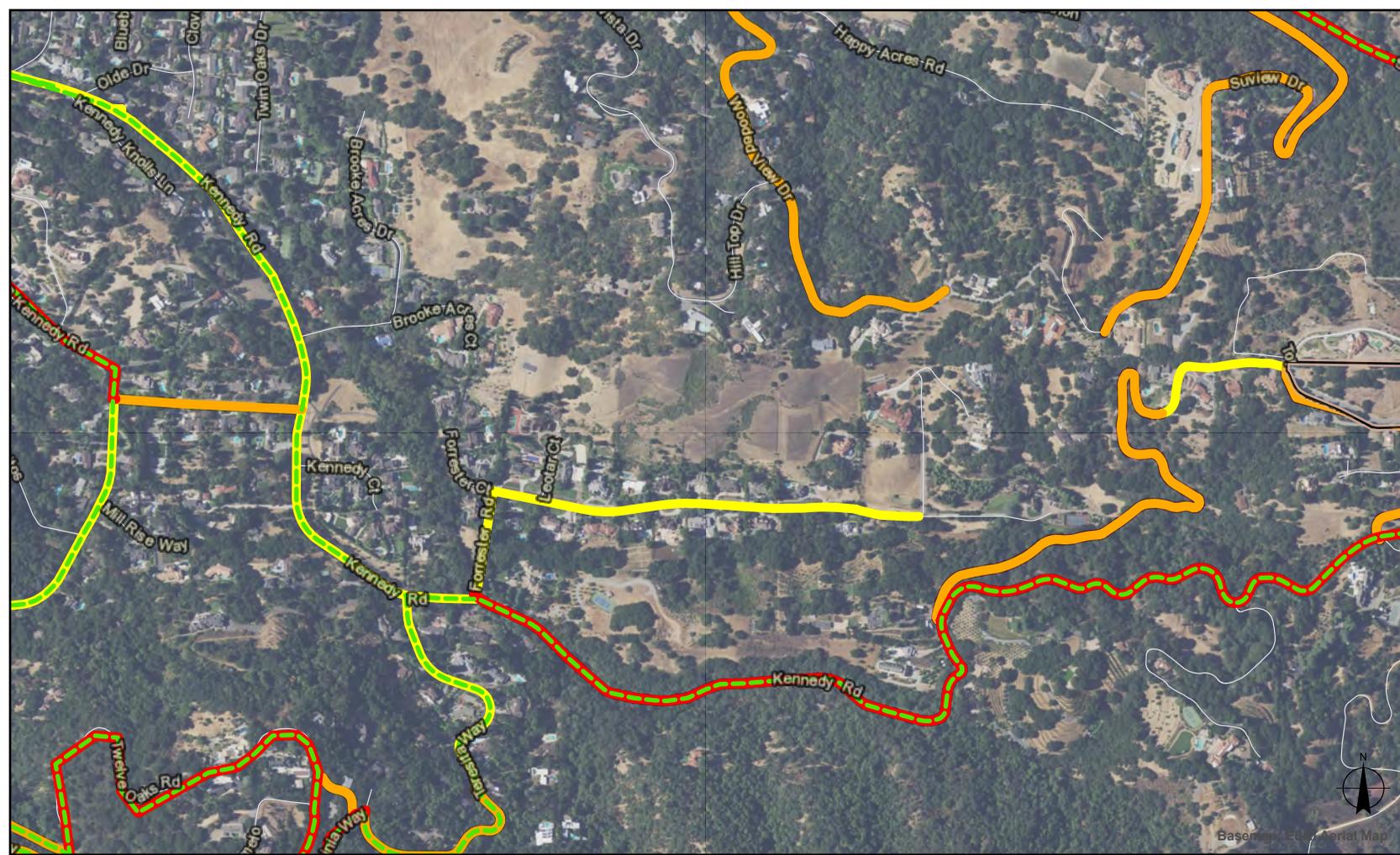
**Priority Levels**

-  Level 1 (11.26 Miles)
-  Level 2 (7.38 Miles)
-  Level 3 (12.45 Miles)



Scale: 1:9,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000





- Town of Los Gatos Boundary
- Open Space Area
- Evacuation Routes
- Other Roadways

- Priority Levels**
- Level 1 (11.26 Miles)
  - Level 2 (7.38 Miles)
  - Level 3 (12.45 Miles)



Scale: 1:9,000





- Town of Los Gatos Boundary
- Open Space Area
- Evacuation Routes
- Other Roadways

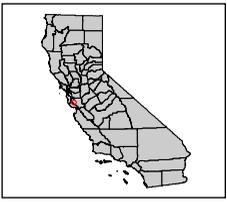
**Priority Levels**

- Level 1 (11.26 Miles)
- Level 2 (7.38 Miles)
- Level 3 (12.45 Miles)



Scale: 1:9,000





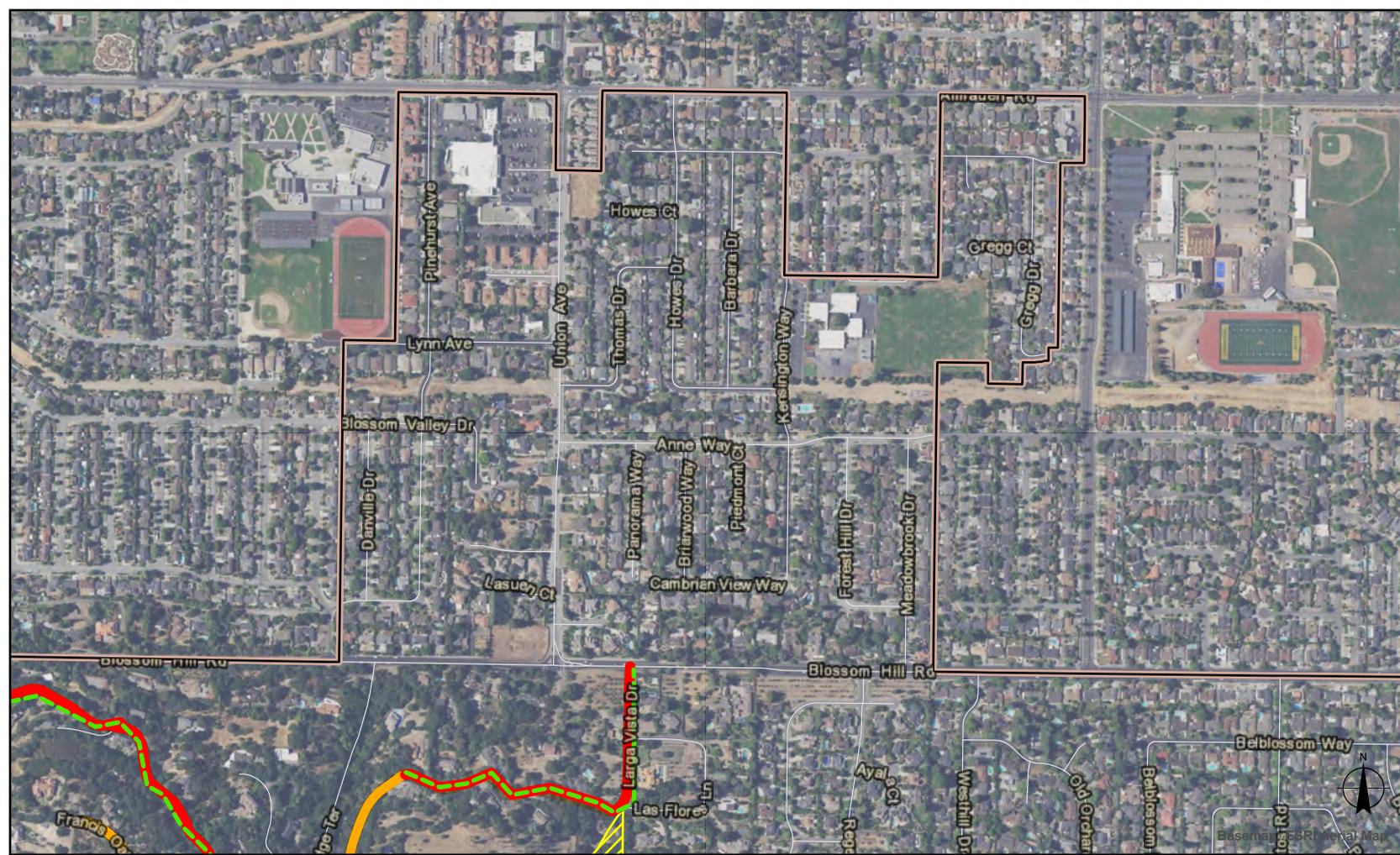
-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:14,000





-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:9,000







-  Town of Los Gatos Boundary
-  Open Space Area
-  Evacuation Routes
-  Other Roadways

- Priority Levels**
-  Level 1 (11.26 Miles)
  -  Level 2 (7.38 Miles)
  -  Level 3 (12.45 Miles)



Scale: 1:28,000



**AVOIDANCE AND MINIMIZATION MEASURES**

The Town’s Project design avoids impacts to sensitive resources by selecting work area footprint locations in the least environmentally sensitive areas available.

The Town has incorporated the following general Avoidance and Minimization Measures (AMMs) into the proposed project to minimize impacts to residents as well as potential jurisdictional features, special-status species (including federal and state-listed species), wildlife habitat and movement corridors, and natural communities.

**Table 3. Avoidance and Minimization Measures**

ID #	Avoidance and Minimization Measure
1	A cultural resources records search was completed for the Town General Plan and resources were not found in areas that will be impacted by the roadways. In addition, only minimal soil disturbance is expected as part of the project. Therefore, cultural and paleontological resource impacts are not anticipated. If during any phase of the project, cultural and/or paleontological resources or human remains are discovered, work will be stopped until the find has been evaluated and the potential significance determined by a qualified professional archaeologist and an appropriate course of action has been recommended.
2	During project activities, all trash that may attract predators shall be properly contained, removed, and disposed of regularly. Following vegetation management activities, trash and debris shall be removed from work areas.
3	<p>Project activities will be designed to avoid significant effects on special-status species that are listed as rare, threatened, or endangered under Federal law or are listed as rare, threatened, endangered, candidate, fully protected, or species of special concern under State law. A desktop review of the California Diversity Database and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation System has been conducted and a reconnaissance survey of the roadways was completed by SWCA Environmental Consultants in July 2020.</p> <ul style="list-style-type: none"> <li>a. A qualified biologist will be retained to conduct a training to field personnel on sensitive habitat and species prior to vegetation management work.</li> <li>b. A qualified biologist will be engaged prior to roadway work to review the work locations. The biologist will be retained to survey the project area for special-status species if work occurs adjacent to suitable habitat.</li> <li>c. A qualified biologist will be retained to conduct a nesting bird survey if work occurs during the nesting bird season (generally March 1 through September 15). If a nesting bird is found, the biologist will provide measures to avoid impacting the species, such as implementing an appropriate no disturbance buffer.</li> </ul>
4	If special-status wildlife is encountered during project activities, it will be unharmed, allowed to leave the area on its own volition, or the appropriate regulatory agency (i.e., California Department of Fish and Wildlife [CDFW] or USFWS) will be contacted to determine the appropriate action to relocate the species.
5	If work will impact riparian vegetation, the Town will consult the Regional Water Quality Control Board and CDFW, as appropriate. The following areas contain riparian resources that may need to be trimmed. These

potential resources were identified using the National Hydrologic Dataset mapping tool and were verified in the field as shown in the table below. Areas identified with riparian vegetation include:

<u>Road Name</u>	<u>Extent of Riparian Vegetation</u>
Almendra Avenue	No riparian vegetation observed.
Blackberry Hill Road	No riparian vegetation observed.
Foster Road	No riparian vegetation observed.
Hernandez Avenue	No riparian vegetation observed.
Hicks Road	Well-developed riparian corridor consisting of willow, walnut, and western sycamore between town boundary near Wagner Road and town boundary near Burke Ave. The majority of this vegetation is within 10' of the road.
Kennedy Road	Non-contiguous canopy of individual western sycamore trees situated on the north side of the road between Forrester Road and Coporate Limit. Likely supported by an ephemeral roadside ditch/ drainage. Some bed and bank observed near roadway.
Shannon Road	Limited willows and walnut riparian vegetation between Cerro Vista Court and midway between Suview Drive / Sky Lane. Semi-contiguous canopy in areas. Supported by an ephemeral ditch/drainage. Additional willow riparian vegetation observed at intersection with Kennedy Road. Some semi-contiguous and non-contiguous willow and walnut riparian canopy between Kennedy and Hicks Road. Supported by an ephemeral ditch/drainage.
Short Road	No riparian vegetation observed.
Talt Avenue	No riparian vegetation observed.
University Avenue	No riparian vegetation observed.
Victory Lane	No riparian vegetation observed.

- 6 Vegetation within a riparian area will not be removed. Only trimming will occur in these areas above and adjacent to roadways. .

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- 7 Heavy equipment operations will not be conducted on slopes greater than 50 percent or in any slide or unstable areas.

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- 8 No work will occur in standing water associated with a stream or creek in the project area.

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- 9 During VMP implementation, fuel and hazardous materials will be kept at 100 feet from waterbodies to provide protection from accidental leaks or spills.
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- 10 All fueling and maintenance of vehicles and other equipment and staging areas shall occur at least 100 feet from potentially jurisdictional drainages.
- 
- 11 Prior to the onset of work, the Contractor shall ensure that there is a plan to allow a prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills, and of the appropriate measures to take should a spill occur.
- 
- 12 Soil and trimmed or chipped vegetation will not be placed where it could enter a waterbody or cover vegetation.
- 
- 13 Herbicides will not be used as part of the project.
- 
- 14 Project activities will be conducted to avoid introducing or spreading invasive plant species. The following are CAL-IPC Best Management Practices to prevent the spread of invasive species:<sup>13</sup>
- a. Provide prevention training to staff and contractors prior to starting work.
  - b. Schedule activities to minimize potential for introduction and spread of invasive plants.
  - c. Designated waste disposal areas for invasive plant materials and contain invasive plant material during transport.
  - d. Plan travel routes to avoid areas infested with invasive plants.
  - e. Clean tools, equipment, vehicles and animals before transporting materials and before entering and leaving worksites.
  - f. Clean clothing, footwear and gear before leaving infested areas.
  - g. Carry portable cleaning tools that can be used without water.
  - h. Prepare worksites to limit the introduction and spread of invasive plants.
  - i. Minimize soil and vegetation disturbance.
  - j. After activities, monitor worksites for invasive plants.
  - k. Prevent invasive plant contamination of project materials when stockpiling and during transport.
- 
- 15 When possible, project activities will ensure that fuel breaks or tree removals are blended into the surrounding environment.
- 
- 14 Idling of construction vehicles and equipment shall be minimized to no more than three minutes to the extent feasible. Construction foremen shall include briefing crews on vehicle use as part of pre-construction site meetings. These briefings shall include discussion of “common sense” vehicle use.
- 
- 16 Prepare and implement a Traffic Control Plan to describe procedures to guide traffic (such as signage and flaggers), safeguard construction workers, provide safe passage of traffic, and minimize traffic impacts, as necessary, through the duration of the vegetation management project. Coordinate with work with local emergency services providers, as necessary, to ensure that emergency vehicle access and response is not impeded.
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<sup>13</sup> CAL IPC. 2012. *Preventing the Spread of Invasive Plants. Best Management Practices for Land Managers* (3<sup>rd</sup> ed.). Cal-IPC Publication 2012-03. California Invasive Plant Council. Berkeley, CA. Available at: <https://www.cal-ipc.org>. Accessed July 28, 2020.

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- 17 Per the Town of Los Gatos Noise Ordinance (Section 16.20.035), vegetation management activities will be limited to the hours between 8:00 am and 6:00 pm Monday through Friday and 9:00 am to 4:00 pm on Saturday.<sup>14</sup>
- 
- 18 The Project will maintain fire-safe working conditions and best management practices. These will include:
- a. All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for incipient stage fire suppression.
  - b. No smoking is allowed in any areas of vegetation management activities along Town roadways. All vehicle parking will be restricted to paved or graveled surfaces.
  - c. Require spark arrestors on all off-road equipment.
  - d. Monitor weather and fire danger on a daily basis. During Red Flag Warnings, a crew member will be assigned to fire watch for each separate and distinct active work area.
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<sup>14</sup> Town of Los Gatos. 1991. *Town of Los Gatos Municipal Code. Chapter 16. Noise*. Available at: [https://library.municode.com/ca/los\\_gatos/codes/code\\_of\\_ordinances?nodeId=CO\\_CH16NO](https://library.municode.com/ca/los_gatos/codes/code_of_ordinances?nodeId=CO_CH16NO). Accessed July 28, 2020.

## EXEMPT STATUS

The project qualifies for a California Environmental Quality Act (CEQA) Statutory Exemption under Article 18, *Section 15269(c) – Emergency Projects* exemption. In addition, even if the project is not statutorily exempt, the project would qualify for a Class 1 Categorical Exemption under Article 19 (Categorical Exemptions) of the State CEQA Guidelines.

### Reason Why the Project is Statutorily Exempt

Article 18 (Statutory Exemptions) of the State CEQA Guidelines lists types of projects that are exempt to the requirements of CEQA. This section provides an analysis of why this project meets the conditions for a *Section 15269(c) – Emergency Projects* exemption.

#### *15269 Emergency Projects*

Section 15269(b) and (c) consist of:

*(b) Emergency repairs to publicly or privately-owned service facilities necessary to maintain service essential to the public health, safety or welfare. Emergency repairs include those that require a reasonable amount of planning to address an anticipated emergency; and*

*(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.<sup>15</sup>*

### Statutory Exemption Analysis

Section 15269(b) of the CEQA Guidelines specifies that the exemption applies to “*emergency repairs to publicly or privately-owned service facilities necessary to maintain service essential to the public health, safety or welfare*”. Section 15269(c) of the CEQA Guidelines specifies that the CEQA statutory exemption for emergency projects exempts specific actions necessary to prevent or mitigate an emergency, including

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<sup>15</sup> CCR Title 14, Division 6, Chapter 3, Article 18. Statutory Exemptions, Section 15269 Emergency Projects. Available at: [https://govt.westlaw.com/calregs/Document/IF7A5824AA17948DA8DD8EBA570583BCB?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)#:~:text=\(a\)%20Projects%20to%20maintain%2C,with%20Section%208550%20of%20the](https://govt.westlaw.com/calregs/Document/IF7A5824AA17948DA8DD8EBA570583BCB?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)#:~:text=(a)%20Projects%20to%20maintain%2C,with%20Section%208550%20of%20the). Accessed July 28, 2020.

where “fire or catastrophic risk mitigation or modifications to improve facility integrity are proposed for existing facilities in response to an emergency at a similar existing facility.”

**The proposed Project meets these conditions.** The proposed Project would be statutorily exempt from environmental review under CEQA because it consists of vegetation management along roadways which would be used for both emergency access and evacuation in the event of a wildfire. The roadways do not currently meet the emergency response requirements of a minimum clear width of 20 feet and a minimum clear height of 13 feet 6 inches. In addition, areas within 10 feet of the roadways have not been cleared of non-fire-resistant vegetation.

This statutory exemption applies to the whole of the roadside vegetation management operation because the project is being implemented as fire or catastrophic risk mitigation to improve the integrity of the access roads, thereby improving both access for fire equipment and evacuation safety for residents. This statutory exemption is applicable if measures are “in response to an emergency at a similar existing facility” and if there is substantial evidence in the record to prove an emergency situation exists. Because of the increasing danger of wildfire in the WUI in California, the Town intends to begin performing roadside vegetation management activities as soon as possible and before the peak of the 2020 fire season occurs in order to reduce the vulnerability of its citizens to wildfire.

Analysis of the Fire and Resource Assessment Program (FRAP) fire history database shows recurring years with high wildfire activity (in terms of area burned) in the Bay Area. Prior to 2017, the peak year was 1964.<sup>16</sup> The North Bay fires of October 2017 burned more than twice the area of any previous year, following close on the heels of the large and destructive Lake County fires of 2015. As of 2018, six of the top 20 most destructive fires in California history (in terms of buildings lost) have occurred in the Bay Area.<sup>17</sup>

There is evidence to show that rising temperatures associated with climate change are increasing fire activity in the San Francisco Bay Area. There is also evidence that suggests fire risk is increased where development expands in the WUI.<sup>18, 19</sup> Warming temperatures combined with expansion of the WUI are

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<sup>16</sup> CalFire. 2020. *Fire and Resources Assessment Program Database*. Available at: [http://frap.fire.ca.gov/data/frapgisdata-sw-fireperimeters\\_download](http://frap.fire.ca.gov/data/frapgisdata-sw-fireperimeters_download). Accessed July 30, 2020.

<sup>17</sup> State of California Office of Planning and Research, California Energy Commission, California Natural Resources Agency. 2019. *California's Fourth Climate Change Report. San Francisco Bay Area Region Report*. Available at: <https://www.climateassessment.ca.gov/regions/>. Accessed July 30, 2020. Pp. 27-30.

<sup>18</sup> California Governor Office of Emergency Services (OES). 2018. *2018 State of California Hazard Mitigation Plan*. Available at: <https://www.caloes.ca.gov/cal-oes-divisions/hazard-mitigation/hazard-mitigation-planning/state-hazard-mitigation-plan>. Accessed, July 30, 2020.

<sup>19</sup> State of California Office of Planning and Research, California Energy Commission, California Natural Resources Agency. 2019. *California's Fourth Climate Change Report. San Francisco Bay Area Region Report*. Available at: <https://www.climateassessment.ca.gov/regions/>. Accessed July 30, 2020.

projected to increase fire risk in most of the Bay Area including the Town. Wildfire vegetation management is recognized as an important strategy for managing future fire risk to people and structures.

### **Categorical Exemption Analysis**

Article 19 (Categorical Exemptions) of the State CEQA Guidelines lists classes of projects that are exempt to the requirements of CEQA. This section provides an analysis of why this project also meets the conditions for a *Class 1 – Existing Facilities* exemption along with the reasons why none of the possible exceptions to Categorical Exemptions, found in *Section 15300.2 Exceptions*, apply to this Project. The statutory language of each condition and possible exception is printed in italics below, followed immediately by the Project-related analysis for each condition and exception.

*15301 Existing Facilities. Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.*

*15301(c) consists of “Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety, and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes)*

Under this exemption, maintenance of existing streets is authorized for the purpose of public safety.

**The proposed Project meets this condition.** The proposed project would be categorically exempt from environmental review under CEQA because it consists of vegetation management activities over existing streets to meet current standards of public safety and access. The project is required to achieve emergency access standards for roadways of 20 feet horizontal clearance and 13 feet 6 inches vertical clearance, as well clearance of non-fire-resistive vegetation within 10 feet of the roadways.

Although the activities will occur in some environmentally sensitive areas (where roads cross riparian areas) protection measures have been incorporated into the project to reduce the potential for impacts. Project activities will be designed to avoid significant effects on special-status species that are listed as rare, threatened, or endangered under Federal law or are listed as rare, threatened, endangered, candidate, fully protected, or species of special concern under State law. A desktop review of the California Diversity Database and U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation System has been conducted and a reconnaissance survey of the roadways was completed by SWCA Environmental Consultants in July 2020. A qualified biologist will be engaged prior to roadway

work to review the work locations. The biologist will be retained to survey the project area for special-status species if work occurs adjacent to suitable habitat. Cultural resources are not anticipated to be impacted by the project.

### **Conclusion**

As outlined above, the proposed work would not result in a serious or major disturbance to environmental resources. Therefore, the project is eligible for categorical exemption under CEQA.

### **Exceptions to Categorical Exemption Analysis**

#### *15300.2 Exceptions*

*(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

**This exception does not apply to the proposed project.** The proposed vegetation management project is not a Class 3, 4, 5, 6 or 11 project.

*(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

**This exception does not apply to the proposed project.** The project consists of a short-term vegetation management period that will not impact biological or cultural resources. In addition, the project would not generate any significant number of vehicle trips and would not result in any significant impacts and would therefore not contribute to any cumulative traffic, air quality, or noise impacts as they will occur within existing roadways and would meet local requirements for noise and traffic control. Therefore, impacts would be less than significant.

*(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

**This exception does not apply to the proposed project.** There are no unusual aspects to the project that would create a reasonable possibility of significant effects to the environment. Reasonable AMMs will be undertaken during the duration of the Project. With AMMs, the project would not impact biological or cultural resources. The project would not generate significant air quality, hazardous materials, noise, or traffic impacts. Therefore, impacts would be less than significant.

*(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

**This exception does not apply to the proposed project.** According to the California Department of Transportation, portions of California State Route 9 (SR 9) in Santa Clara County are eligible for designation as a State Scenic Highway. However, the designated portion of SR 9 refers to areas outside of the vicinity of the project area near Highways 35 and 17.<sup>20</sup> Because the project would trim vegetation on local roads, outside of the proposed scenic highway designation there would be no damage to scenic resources due to project implementation. No impact would occur.

*(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

**This exception does not apply to the proposed project.** No portion of the vegetation management project seeking Categorical Exemption occurs on a hazardous site or a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. There are three locations identified on the Geotracker database where hazardous materials cleanup efforts have been or are underway adjacent to the project area. All three sites involve releases from dry cleaners into the local groundwater, and none of the sites involve the adjacent roads.<sup>21</sup> The project would remain on or directly adjacent to the existing roadways and would not result in any disturbances to pavement or soil. No impact would occur.

*(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

**This exception does not apply to the proposed project.** The project would remain on or adjacent to existing roads. Vegetation removal along existing roads would not impact any structures. Therefore, no impact to historical structures would occur.

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<sup>20</sup> Caltrans. 2019. *List of Designated and Eligible State Scenic Highways*. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed July 28, 2020.

<sup>21</sup> State Water Resources Control Board. 2020. *GeoTracker*. Available at: <https://geotracker.waterboards.ca.gov/>. Accessed July 30, 2020.