BOTANICAL RESOURCES GUIDANCE MEMO GOALS AND OUTLINE

GOALS OF GUIDANCE DOCUMENT:

* Clarify scope of botanical resource documentation that must be submitted at time of plan review.
* Identify degree of RPF flexibility to designate assessment areas based on size/scale of project
* Provide tools for RPFs to appropriately identify “special status species” based on appropriate legal designations of status (such as ESA, CESA, CNPPA) and other informational sources. Clarify bases for special status based on potential 14 CCR 15380(d) eligibility.
* Provide appropriate tools for RPFs to evaluate degree to which “sensitive natural communities” should be addressed under CEQA.
* Establish list of appropriate informational sources for scoping (such as CNDDB or BIOS).
* Provide situational clarity of when botanical surveys are necessary and where RPFs may justify their omission from plan.
* Provide situational clarity as to when floristic survey is necessary and when RPF may recommend alternatives such as a focused survey.
* Identify appropriate qualifications for surveyors.

Board of Forestry and Fire Protection: Guidance Memo Outline

1. Introduction/ Goal
   1. CEQA compliance: identify/mitigate potential significant environmental impacts caused by timber operations to plant species of consequential status. [[1]](#footnote-1)
   2. Update content and resolve conflict between various CAL FIRE /CDFW guidance documents.
2. Scoping
   1. What?
      1. Plant Species of Consequential Status / Habitat
         1. Formally Listed [ESAs/CNPPA/Etc]
         2. 15380 [Not listed, buy objectively meet criteria for listing]
            1. How established? Agency regs only? Informal lists or processes?
         3. Locally rare/unique plant species? (14 CCR § 15125(c))
         4. Use of Natural Community Conservation Plans (FGC § 2800 *et seq.*)
      2. Non-listed species with potential for significant adverse environmental impact?
      3. Identify:
         1. Plant species of consequential status known to occur in region
         2. Plant species of consequential status not known to occur in region, but for which appropriate habitat exists in plan area
         3. Non-consequential status plants with potential for significant environmental impact. (14 CCR § 15125(c))
   2. Where?
      1. Project Area
      2. Assessment Area
         1. Degree of RPF flexibility based on professional judgment (deference to generally accepted prescriptive standards vs. consideration of factors relevant to project scale)
         2. Variable based on resources (flora vs fauna)
   3. When?
      1. Prior to plan review or operations depending on project design and mitigation (avoidance).
   4. Info sources
      1. CNDDB
      2. BIOS
      3. Prior surveys
      4. Environmental Documents for projects in vicinity
      5. Academia?
      6. Professional/Scientific Organizations?
      7. Natural Community Conservation Plans or Habitat Conservation Plans
3. Surveys
   1. When needed?
      1. Lack of information regarding plant location or habitat requirements.
      2. Degree to which it can be confirmed that plants not located in the region, timber ops not occurring in areas of appropriate habitat, etc.
      3. Degree to which recent survey exists and no svfignificant environmental changes warrant updating survey (drought, wildfire, etc).
      4. Avoidance: Timber Ops deliberately planned to avoid potential significant impacts.
      5. Avoidance: In lieu measures for avoidance, such as LTO education
   2. Type/Content
      1. Floristic v. Focused?
   3. Timing
      1. Need to repeat prior surveys?
      2. Sufficient area visits to identify species through vegetation cycle?
   4. Demonstration of Expertise
      1. When would demonstration of such expertise be necessary;
         1. Conformance with PRC § 752(b)

1. This term “plant species of consequential status” is used to avoid confusion with the term “special status plant species,” which does not have a precise legal definition or commonly understood scope amongst stakeholders. [↑](#footnote-ref-1)