CEQA STATUTORY EXEMPTION FOR RESTORATION PROJECTS (SERP) CONCURRENCE REQUEST

Completion and submission of this form is voluntary. This form may be submitted to request concurrence from the Director of Fish and Wildlife pursuant to Public Resources Code section 21080.56.

The Lead Agency may submit this signed form (pdf) and all attachments via the Department's Environmental Permit Information Management System (EPIMS) Document Repository or via email at restorationpermitting@wildlife.ca.gov.

1. LEAD AGENCY

Lead Agency Name:	California State Parks
Contact Person's Name:	Tim Hyland
Street Address:	303 Big Trees Park Road
City, State, Zip:	Felton, CA 95018
Contact Person's Telephone:	831-335-6318
Contact Person's E-mail:	tim.hyland@parks.ca.gov

2. PROJECT PROPONENT ☒ Check Box and Skip to Number 3 if Same as Lead Agency

Business/Agency/Organization:	Click or tap here to enter text.
Contact Person's Name:	Click or tap here to enter text.
Street Address:	Click or tap here to enter text.
City, State, Zip:	Click or tap here to enter text.
Contact Person's Telephone:	Click or tap here to enter text.
Contact Person's E-mail:	Click or tap here to enter text.

3. PROJECT INFORMATION

A. Project Name:	Lodge Road Wildfire Resilience and Large Tree Restoration Demonstration Project
B. County or Counties:	Santa Cruz
C. Lat./Long. Coordinates:	37.17858205240408, -122.19239247112554
D. Estimated Project Start/End Dates:	August 2024 – December 2032

E. Provide a brief description of the future discretionary Project approval the Lead Agency is considering (see CEQA Guidelines sections 15352 and 15378) and an approximate date range for when the Lead Agency may make that approval if the Lead Agency obtains a SERP concurrence from CDFW.
State Parks has completed a Project Evaluation Form (PEF), an internal review process that examines and addresses potential impacts to natural, cultural, aesthetic, and recreation resources. This PEF was formally approved on February 22nd 2024 and a Notice of Exemption has been drafted. If State Parks obtains a SERP concurrence from CDFW they intend to file an NOE with the State Clearinghouse within 48 hours of receiving

concurrency, which is anticipated to occur in August 2024. The Lead Agency, State Parks, will directly carry out the project.

F. Provide a brief description of the Project location, size, and funding sources. Please cite and attach any supporting documents.

The Lodge Road Wildfire Resilience and Large Tree Restoration Project (Project) encompasses a ~53.4-acre area located along a county-maintained road in second growth redwood forest within Big Basin Redwood State Park, Santa Cruz County, California (Map 1). Assessor's Parcel Numbers (APNs): 086-011-27, 086-041-59, 086-041-60, 086-041-61, and 086-041-62. The DPR is funding the project through use of the Wildfire Resilience Fund, which is intended to fund critical land management to restore resilient ecosystems.

G. Provide a brief Project description, including any post-restoration work, operation and maintenance, or other related activities. Summarize the Project's expected environmental benefits (e.g., acres or stream-miles restored/enhanced, species benefitted, etc.). Please cite and attach any supporting documents.

Project Description:

The project is located within Big Basin Redwoods State Park (BBRSP). BBRSP consists of about 4,500 acres of old-growth forest and suitable nest trees within redwood or Douglas-fir forests and is the largest remaining stand of old-growth in the Santa Cruz Mountains. The park is characterized by many large and tall trees with dead and deformed or broken tops and branches, trunks with fire scars or cavities, the presence of snags, and large dead trees lying on the forest floor which was thick with organic debris. The project area is adjacent to the old growth stands and was logged prior to being incorporated into the park. At the time of the CZU Fire, the area was primarily a second growth redwood forest with components of Douglas-fir and tanoak tree species.

The 2020 CZU Lightning Complex's (CZU Fire) impact on BBRSP and the surrounding landscape will be significant for decades to come. Numbers of hardwoods, Douglas-fir, and many small to mid-range diameter second growth redwoods (mostly <~18") perished as a result of dense stand structures in combination with extreme weather, historic anthropogenic influences such as clearcutting, and other factors that exacerbated fire behavior. Approximately 70% of marbled murrelet (*Brachyrampus* marmoratus) breeding habitat in the Santa Cruz Mountains was lost as a direct result of the 2020 CZU Fire (Halbert, 2022; Attachment 1).

Although the impact to the forest ecosystems of Big Basin was significant, this disturbance is part of the natural cycle of disturbance of coast redwood forests. The CZU Fire resulted in significant forest characteristic development, such as increased snags, additional structure of old growth trees, downed woody debris, large woody debris contribution to the stream systems, nutrient additions to the soil, understory development of nitrogen fixing plants, basal sprouting from live root systems, and increased extent of sensitive plant communities.

This unprecedented disturbance event left behind variable post-fire-conditions, creating an opportunity to demonstrate how ecologically restorative treatments can be applied to reduce historic impacts, increase resilience to future wildfire, and promote ecosystem health in the face of changing climates. Additional efforts are being planned and are underway in Big Basin to increase the frequency of restorative treatments with the intent to implement more prescribed fire across the park. This project will collect needed data to evaluate ecosystem response to proposed treatments and provide opportunities to educate the public.

The goal of the Lodge Road Wildfire Resilience and Large Tree Restoration Project is to demonstrate the implementation of various restorative forest health treatments to increase habitat quality and connectivity to existing habitat for marbled murrelet and other native species by promoting growth in larger trees to develop late-seral redwood forest structure. Project treatments will increase ecosystem resilience by reducing forest density, supporting long-term protection for native species habitat. Restorative treatments will include:

- the selective removal of mid-range diameter (up to ~24") second growth redwoods exhibiting post-fire mortality or decline of the above ground portion of the tree in order to accelerate growth of larger second-growth trees in better health. Proposed removal methods are planned to include but are not limited to mechanical removal using heavy machinery or manual removal using hand crews.

- reduction of understory vegetation and small to mid-range trees; the removal of dead standing hardwoods that will elevate the risk of extreme fire behavior in the next decade;
- Prescribed burning, including pile burning and broadcast burning, to promote the structural diversity of the stand, as well as to increase understory plant diversity.

Operations:

The Project contains four treatment units that are delineated by species composition and/or site-specific restorative treatment prescriptions. Treatment unit prescriptions and prescribed fire operational considerations are described below (Map 2):

Redwood Unit A (~24.4 acres): Selective thinning of redwood trees ~12-24" diameter at breast height (DBH). Removal of all dead trees and vegetation less than or equal to 12" DBH within 50' of redwood groves and/or roads. Removal of all dead hardwoods of any size that increase the risk of increased fire intensity in proximity to redwoods due to fuel accumulation or are a hazard to redwood groves Understory vegetation not marked for retention will be masticated. Broadcast burning, including necessary site preparation, following completion of mechanized forest density reductions in designated areas. Hardwoods between ~12-24" diameter may be bucked and piled for pile burning in designated locations within the unit.

Redwood Unit B (~10.3 acres): Thinning of all redwoods less than or equal to 24" DBH. Removal of all dead hardwood less than 16" DBH, tractor crush dead hardwoods less than 12" DBH, and tractor crush all dead trees less than 12" DBH within 50' of roads. Understory vegetation may be crushed by equipment, but not intentionally masticated. Broadcast burning, including necessary site preparation, following completion of mechanized forest density reductions.

Hardwood Unit (~11.6 acres): Removal of all hardwoods of any size in redwood groves and within 50' of redwood groves, individual redwood trees greater than 24" DBH, roads, or live, mature hardwoods (greater than 20" DBH). Hardwoods greater than 12" DBH will be transferred to a decking location. Hardwoods less than 12" DBH will be masticated. Understory vegetation may be crushed by equipment, but not intentionally masticated. Hardwoods between ~12-24" DBH may be bucked and piled for pile burning in designated locations within the unit.

Prescribed Burn Unit Prep (~8.3 acre footprint): To prepare the site for restorative broadcast burning treatments, masticate dead trees up to 12" DBH within 25' from the edge of the control line, remove dead trees of any size within 50' of control line, masticate vegetation and trees up to 12" DBH along the designated control line ridge. All felled trees should be felled toward the interior of the burn unit or removed from the unit. This unit overlaps with ~3.54 acres of Redwood Unit A and Redwood Unit B, which results in a ~4.76-acre footprint that does not contain overlap.

Prescribed Burn Implementation

Broadcast burning, as defined by the USFS, is the controlled application of fire to fuels, under specified conditions that allow fire to be confined to a predetermined area and produce the fire behavior and characteristics required to meet forest health objectives identified in a detailed burn plan. CA State Parks has drafted and thoroughly reviewed a burn plan that includes this project area (Attachment 7). The broadcast burn may include the entire project area (~53.4 acres) or a subset of the area depending on operational and ecological considerations.

Certain criteria must be met before State Parks conduct any burn operations. This includes but is not limited to obtaining proper air quality and burn permits from the local air quality management district and CALFIRE, respectively. Furthermore, weather conditions such as temperature, relative humidity, and wind speed will be carefully monitored in the days leading up to a burn and must fall within a certain range detailed in the burn plan. All burn operations will be led and implemented by qualified State Parks staff.

Continued Restoration Work:

Continued restoration work will include repeated, periodic prescribed burning to retain understory diversity and limit ladder fuel connectivity by reducing small diameter stems across the Project. State Parks intends to maintain a fire return interval of 7-15 years within the project area, which is consistent with reconstructed historical fire frequencies in the Santa Cruz mountains (Stephens and Fry, 2005). Future maintenance plans and treatment prescriptions will be informed by an adaptive management approach shaped in part by long-term

monitoring of site conditions using Forest Trend Plots (FTPs). Plots have been installed amounting to a ~14% sample across treatment units, with an additional 5 plots installed within the broadcast burn unit, to monitor conditions before and after the implementation of restorative treatments within the project area (Map 3). State Parks may adjust the intended fire return interval if data from the FTPs suggests that fuel loads reach an excessive level that could negatively impact the reestablishment of redwood canopy cover in the project area.

State Parks will remove high priority invasive species throughout the project timeline as part of their ongoing maintenance. State Parks uses an integrated pest management (IPM) approach to remove invasive vegetation that includes mechanical, manual, and chemical methods for removal.

Other Related Activities:

The various prescriptions for restorative treatments included in the Project are intended to serve as a demonstration of the value of mid-range diameter density reduction, understory treatments, and prescribed fire in advancing development of late seral forest conditions. In doing so, the State Parks and its collaborating agencies intend the Project to encourage widespread adoption of additional restoration projects throughout State Parks Santa Cruz District forestlands. These efforts include public outreach and educational opportunities, some of which will be informed by the results of long-term FTP monitoring.

Expected Environmental Benefits:

The Project will provide the environmental benefits of habitat improvement, wildfire resilience, and improved forest conditions through planned forest density reductions, understory treatments, and prescribed burning. These treatments will develop habitat conditions that support marbled murrelets in the canopy of conifers within the Project, as well as heterogeneous forest structure and understory conditions to support habitat for native plant and animal species, such as huckleberry (*Vaccinium ovatum*), evergreen violet (*Viola sempervirens*), townsend's big-eared bat (*Corynorhinus townsendii*), and unsilvered fritillary (*Speyeria adiaste adiaste*). The resulting stand will develop late seral characteristics more quickly than if left untreated. Treatments will result in increased wildfire resilience and carbon sequestration, while increasing connectivity to other late seral and old growth forest stands within Big Basin. The Project's objectives and expected environmental benefits align with the forest management goals (Attachment 2) and climate adaptation strategies (Attachment 3) contained in the Forest Management Strategy for Big Basin, Año Nuevo, and Butano State Parks. These goals and strategies include:

- Increase connectivity of large diameter forest stands and old growth forest characteristics by managing adjacent redwood stands to enhance old growth characteristics (Forest Management Goal)
- Maintain flooding, tidal flows, and other natural disturbance regimes, including fire, that support sustainable populations of most of the species present at BBRSP, ANSP, and BSP (Forest Management Goal)
- Manage vegetation and forests to increase resilience in anticipation of climatic trends at BBRSP (Forest Management Goal)
- Administer prescribed fire (Climate Adaptation Strategy)
- Protect and manage old growth redwood and late successional stands (Climate Adaptation Strategy)
- Restore connectivity of old growth redwood forests and late successional forests (Climate Adaptation Strategy).

H. CDFW recommends direct coordination with all interested California Native American tribes. Please provide a summary of the Lead Agency's engagement with tribes. Be careful not to include any sensitive or confidential information. Please cite and attach any supporting documents.

Tribes affiliated with the area were identified and contacted using the Native American Heritage Commission (NAHC) contact list. State Park's qualified archaeologist and tribal liaison contacted three tribal organizations: Association of Ramaytush Ohlone, Amah Mutsun Tribal Band, and the Muwekma Ohlone Tribe. Of those three, only the Association of Ramaytush Ohlone responded with potential questions about soil disturbance resulting from the creation of fuel breaks and forest density reduction strategy in general. State Parks responded with the project description and summary of treatment restrictions. There were no further responses from tribal contacts.

State Park's qualified archaeologist has completed a records search for recorded pre-historic and historic resources. Recorded and known archeological resources identified prior to operations will receive an appropriately sized buffer identified by State Park's qualified archaeologist and flagged with Special Treatment Zone flagging in the field. All trees to be removed in the vicinity of any site will be felled away from the site. For potential archeological resources discovered during operations, including prehistoric or historic era subsurface features such as locally darked soil ("midden"), a 100-foot exclusion buffer will be established, and operations will be avoided around the site. In the case that potential archaeological or cultural resources are discovered, State Parks or their supervised designee will be notified and may prescribe a larger or smaller buffer depending on the resource, and the site will be recorded.

A complete list of project operation conditions is outlined in the Project Specifications (Attachment 4). As part of the Forest Management Strategy for Big Basin, Año Nuevo, and Butano State Parks, a report that contextualizes the archeological and historic resources of the region was prepared by a State Parks Archeologist Michael Grone (Attachment 5).

I. CDFW recommends public outreach and coordination with interested parties and public agencies. Please provide a summary of the Lead Agency's engagement with interested parties and public agencies. Please cite and attach any supporting documents.

State Parks has been actively engaging the public, partnering agencies, stakeholders and partner organizations on future plans for forest management at Big Basin since the CZU Fire in 2020. The following initiatives highlight the efforts taken to this point to engage the public and other public agencies with the Project:

Reimagining Big Basin Vision Summary Meetings: State Parks held a series of webinars and public meetings in 2021 and 2022 to formulate the vision for the future of Big Basin after the severe impacts of the CZU Fire. These meetings included a discussion of forest management goals and strategies including the proposed project treatments. The in-person Vision Summary meetings with the public in June of 2022 included an online survey opportunity. A summary of engagement efforts for the Reimagining Vision Summary in the compendium of community engagement document is available on the project website (Reimagining Big Basin Redwoods State Park, 2022).

Santa Cruz Mountain Stewardship Network Tour: In 2021, State Parks led a tour of Big Basin State Park with over 40 representatives from partnering land management and stewardship agencies in the Santa Cruz Mountains. The tour focused on post-fire forest management and stopped at the project site where consulting foresters and State Parks staff explained restoration goals and the proposed scope of the Project. The Santa Cruz Mountain Stewardship Network includes representatives from over 25 organizations including land trusts, parks and open space districts, resource conservation districts, the Amah Mutsun Tribal Band, and others involved in stewardship of natural resources in the Santa Cruz Mountains.

Big Basin Facilities Management Plan Engagement: Since 2023, State Parks has been engaging the public and stakeholders in developing more specific future plans for the park. Engagement has included a survey and a series of stakeholder meetings. One meeting focused on environmental considerations with representatives from organizations including Sierra Club and the Center for Biological Diversity. Outreach also included a public in-person meeting in February of 2024, where information on the Project was specifically presented to the community. A complete summary of engagement is available in the public draft on the Reimagining Big Basin website (Reimagining Big Basin Facilities Management Plan, 2024).

Parks and Recreation Commission Tour: In March of 2024, State Parks led a publicly noticed tour of Big Basin with Parks and Recreation Commissioners, partners and members of the public to highlight future plans for Big Basin. The tour stopped on Lodge Road and discussed the Project in detail.

4. REQUIRED DETERMINATIONS

Using substantial evidence and best available science, provide a determination and explanation for each SERP criteria listed below:

A. The Project is exclusively one or both of the following: (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, or (2) a project to restore or provide habitat for California native fish and wildlife.

State Parks has determined the Project is exclusively (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and (2) a project to restore or provide habitat for California native fish and wildlife.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

The Project will assist in the recovery of California native fish and wildlife and enhance the habitat upon which they depend by creating future redwood forest conditions suitable not only for marbled murrelet, but for all native species that inhabit the project area. By accelerating development of late seral forest characteristics, forestlands within the Project will contain greater numbers of large trees which marbled murrelet are known to inhabit (Nelson, S. K. 1997). Forest density reductions will create larger canopy openings, promoting raptor and bat inhabitance (Bouvet, et al. 2016), while allowing sunlight to reach the forest floor to improve understory diversity of native plant species. Downed woody debris left from treatment operations will provide habitat opportunities for amphibians and other small mammals (Bunnell & Houde, 2010).

Improvements in forest health through density reduction, understory treatments, and prescribed fire will develop greater resilience to wildfire and other climate-driven disturbances within the project area. Reduced risk of high-severity wildfire and improved vigor of residual trees will restore habitat quality and provide suitable conditions for native species over time.

B. An eligible project may have incidental public benefits, such as public access and recreation.

State Parks has determined that the Project may have incidental public benefits.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

The Project will provide incidental public benefits, specifically in terms of public access and education:

Public Access: The project will remove hazardous standing dead trees near the road, creating safer conditions for public access.

Education: The Project's restorative treatments and resulting forest conditions will provide opportunities for community education that showcases the results of mid-range diameter density reduction, understory treatments, and prescribed fire. To support this objective, a system of FTPs has been installed to monitor pre- and post-treatment outcomes. Ultimately, the Project is intended to demonstrate the value of such treatments, with the goal of drawing support for widespread implementation of similar projects to improve and restore habitat conditions while increasing wildfire resilience across State Parks lands.

C. The Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

State Parks has determined that the Project does both of the following: (1) Results in long-term net benefits to climate resilience, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

For each criterion below, please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Long-Term Net Benefits to Climate Resiliency:

The Project will result in long-term climate resilience by promoting the development of larger trees and late seral forest conditions, which will reduce the risk of high severity wildfire, reestablish pre-colonial fire regimes, decrease the likelihood of vegetation type change, and preserve the suite of ecosystem services provided by forestlands in the project area in the face of shifting climatic conditions towards drier, hotter climates and more frequent wildfire, drought, and disease. State Parks', and therefore the projects, approach to climate resilience relies on ecosystem processes and natural phenomenon as part of the natural condition of the landscape. These processes are critical in maintaining and sustaining vegetation structure and community dynamics, wildlife habitats, and wildlife population health.

Initial mid-range diameter and understory treatments implemented under this project, when combined with long-term maintenance and prescribed burning, promote the growth of larger trees that are more resilient to climate driven disturbances (Kranich, 2023; Attachment 6). As observed from 264 Forest Trend Plots following the CZU Fire, forest stands with fewer trees per acre and larger diameter trees experienced increased resilience to wildfire, whereas stands with higher densities of small diameter trees (less than or equal to 12") experienced increased mortality of the above ground portion of the tree (Kranich, 2023; Attachment 6).

It can be expected that type conversion will be more likely to occur in areas more frequently burned by high severity wildfire exposing the earth to increased solar radiation and decreased evapotranspiration (Duveiller et al., 2018). Mortality from climate driven events, such as wildfire, result in reduced canopy cover which increases the amount of solar radiation that is received by the Earth's surface, which may increase the risk of future vegetation type change. In the face of modern climatic trends (i.e. expected temperature increases), repeated management intended to maintain forested ecosystem resilience is increasingly important (County of Santa Cruz, 2022).

Although carbon storage is considered a co-benefit resulting from actions taken towards these project goals and not a main driver for treatment actions, the Project's improvements in carbon storage may provide future benefits to climate resilience. The proposed treatments will reduce tree density and therefore carbon sequestration in the short-term, but ultimately create long-term conditions of increased carbon storage through the development of larger trees that are resilient to wildfire and climate-change driven disturbances.

Long-Term Net Benefits to Biodiversity:

The Project will result in long-term net benefits to biodiversity by increasing heterogeneity in redwood and hardwood forest stands. Forest density reduction of small and midrange diameter trees will be done in a manner which preserves existing species composition and promotes the health and vigor of the residual stand. Density reduction will result in increased average canopy gap size, increasing the amount of sunlight on the forest floor which will support understory species such as redwood sorrel (*Oxalis oregana*), western sword fern (*Polystichum munitum*), huckleberry (*Vaccinium ovatum*), woodland strawberry (*Fragaria vesca*), and evergreen violet (*Viola* sempervirens) while also providing a heterogenous distribution of shading, snags, and downed woody debris. By enhancing landscape heterogeneity, the Project aims to increase the diversity of habitats, which in turn is expected to support a wider variety of wildlife species such as the marbled murrelet, unsilvered fritillary, Hoary bat (*Lasiurus cinereus*), and townsend's big-eared bat. Increased large wood on the forest floor will also provide habitat for salamanders, such as the California Giant Salamander (*Dicamptodon ensatus*), California Newt (*Taricha tarosa*), and Common Ensatina (*Ensatina* eschoscholtzii). Increased fungal diversity can also be expected.

During operations, measures will be taken to prevent the introduction and spread of invasive species such as French broom (*Genista monspessulana*) and jubata grass (*Cortaderia jubata)* that could compete with native species. Any increase in persistent invasive exotic species that may become established due to the project will be controlled as part of ongoing natural resource maintenance activities. To maintain a diverse native understory structure and composition, prescribed burning will be conducted periodically following project completion.

Long-Term Net Benefits to Sensitive Species Recovery:

One of the Project's primary objectives is to promote the development of late seral forest conditions that may support native species habitat, such as marbled murrelet, which will result in long-term net benefits to sensitive species recovery. Planned restorative forest health treatments to remove mid-range diameter redwood will allow for increased growth and wildfire resilience of residual redwood. Over time, residual redwoods will develop larger branches in the canopy which are observed nesting grounds for marbled murrelet (Nelson, S. K. 1997). These developments in residual redwood stands in the Project will create greater connectivity to other late seral and old growth stands that exist within and in proximity to Big Basin, in turn creating greater habitat connectivity to benefit all species that inhabit the area or rely on late seral conditions.

Sensitive species occurrence within 1 mile of the Project were queried using the California Natural Diversity Database (CNDDB), RareFind 5. The search did not identify any known occurrences of sensitive species within the project area but did identify occurrences in proximity to the Project This included the California red-legged frog (*Rana draytonii*, CRLF), unsilvered fritillary, and townsend's big-eared bat. The disturbance from canopy gap creation and introduction of prescribed fire should have benefits for all three species. The project should increase the abundance and diversity of understory plants, which in turn increases abundance of invertebrates that the CRLF preys upon. Increased sunlight from canopy gaps are likely to promote evergreen violet which the unsilvered fritillary relies upon as a larval host plant and prescribed fire will expand and create basal hollows and cavities in redwood trees and snags that the townsend's big-eared bat utilizes for nesting. If any sensitive species are identified during or before operations, specific operational measures will be taken to avoid significant impacts to identified species or nesting areas.

The Avoidance Measure Recommendations for Marbled Murrelets in the Santa Cruz Mountains Following the CZU Lightning Complex report, developed by State Parks Environmental Scientist Portia Halbert in consultation with CDFW and United States Fish & Wildlife Service (USFWS), determined that specific noise related forest management activities may occur outside of a reduced buffer of 330' from habitat between March 24th to August 5th (Halbert, P. 2022; Attachment 1). This determination resulted from a sound study conducted for various equipment types per the Pacific Seabird Group protocols and due to the severity in which the treatment area burned. The Project footprint is located outside of the 330' old growth habitat buffer and marbled murrelet are not known to occur within or directly adjacent to the project area, however, there is potentially suitable habitat within proximity to the treatment area.

Procedures for the Protection of the Environment:

Avoidance, minimization, and conservation measures will be implemented during project operations to avoid and minimize impacts to sensitive resources and to protect the environment to the greatest extent feasible. Established best management practices and the California Board of Forestry's Forest Practice Rules were considered as part of operational standards.

Dependent on slope and watercourse classifications, Watercourse and Lake Protection Zones (WLPZs) within the Project will be flagged to prevent disturbance of vegetation, leaf litter, and soil along waterways as appropriate. The project contractor is required to implement erosion and dust control measures on roads and graded material utilized for operations. Prior to operations, the area around equipment and staging areas will be inspected for wildlife habitation and equipment leaks, and all trash and non-forest debris resulting from operations will be removed post-operations. Measures are established to avoid damage to leave trees, as well as to prevent introduction and spread of invasive species. Measures are established for spill prevention and equipment fueling, and to prevent and respond to wildfire ignitions that could occur from operational activities.

The contractor implementing the project will be subject to the following avoidance and minimization measures:

- Nesting bird and bat roost surveys are required from February 15th to August 1st and shall be conducted within 7-14 days or any mechanical or manual treatment areas by State Parks or their supervised designee to determine if nesting activity is occurring. Buffers will be established around identified nesting sites during nesting season.
- Mechanized operations shall not occur between March 23rd and August 5th to avoid potential impacts to marbled murrelet.
- The contractor and all employees working in the treatment area are required to participate in a Biological Training for Workers hosted by State Parks. The training will describe the appropriate work practices

necessary to effectively implement biological avoidance measures and to comply with the applicable environmental laws and regulations.

- If any California Endangered Species Act (CESA) or Federally Endangered Species (ESA) listed plant or animal is encountered, operations shall cease in proximity, and the area shall be avoided. State Parks or their supervised designee shall be notified immediately.
- If non-listed special status plant species are identified during operations a buffer zone of 50 feet will be implemented around the species and contact will be made with the State Parks or the supervised designee to determine next steps
- It is likely that contractors will encounter woodrat nests. Woodrat nests should receive a buffer of 5-10 feet for mastication or equipment access. Woodrat nests may only be removed, if necessary, to access a portion of a treatment area otherwise inaccessible or reasonably pass from one treatment polygon to another, and Contractor must receive authorization from the State Parks or their supervised designee.
- California Red Legged Frog (CRF) – mechanized operations will cease for precipitation events and saturated soil conditions, as described below:

  -As defined in 14CCR §895.1: "Saturated Soil Conditions means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing material during Mechanized Equipment Operations, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel rut, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials."

  -During "precipitation events," mechanized operations will cease based on the amount of rainfall recorded in the previous 24 hours. Operations will cease for 24 hours following rainfall amounts of 0.2-1.0 inches, 48 hours following 1.0-2.0 inches, and 72 hours following 2.0+ inches. Precipitation amounts will be based on data recorded by the Ben Lomond RAWS, the nearest representative weather station.
- All staging areas and fueling or maintenance of vehicles and equipment shall occur outside of sensitive habitat areas and at least 65 feet from any water body, drainages (including storm drains), or riparian habitat.
- Major vehicle maintenance, repairs, and washing shall be done off-site.

Any spills of hazardous materials shall be cleaned up and/or removed immediately.

A complete list of avoidance and minimization measures is outlined in the Project Specifications document, which will be provided to the contractor prior to operations (Attachment 4).

During prescribed burn operations, several measures will be taken to protect and avoid impacts to the environment (Attachment 7). Nesting bird surveys will be conducted in the project area during the breeding season (February 15th to August 1st) for birds and areas with identified nests will be avoided. Firing techniques will primarily rely on backing fires that move slowly and provide wildlife the opportunity to escape areas of active fire. Burn operations will also be designed to avoid the entrapment of wildlife, which provides further opportunities for wildlife to escape and avoid fire. If sensitive wildlife species are discovered during burn operations, the burn boss will be notified and may shift work to avoid or minimize impacts to the wildlife.

Ongoing Management for the Protection of the Environment:

State Parks plans to conduct periodic prescribed burning following project completion to maintain a mosaic of understory conditions in line with project objectives. To maintain consistency with the Forest Management Strategy's goals of adaptive management and monitoring (Attachment 8), Long-term Forest Trend Plot monitoring will also be done throughout the life of the SERP/Project to monitor forest conditions over time and inform public outreach and education, as well as appropriate restorative treatments that may be conducted in the future. State Parks will also continue invasive species management as part of ongoing maintenance for the project area, as outlined in the parkwide Vegetation Management Statement (Attachment 9).

D. The Project does not include any construction activities, except for construction activities solely related to habitat restoration.
State Parks has determined that the Project does not include any construction activities, except for construction activities solely related to habitat restoration.
Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.
The Project does not include any construction activities. Use of heavy equipment is exclusively for forest density reductions, understory treatments, and native species habitat enhancements. No new roads will be constructed as part of the Project.

5. CERTIFICATION

I certify that I have the authority to determine whether a project is exempt pursuant to CEQA Guidelines section 15025(a)(1), and this Project meets all the requirements described in Public Resources Code section 21080.56, and that I have submitted all the determinations required therein necessary to obtain the concurrence of the Director of Fish and Wildlife.
 _____ Date: 5/24/2024 Lead Agency Signature Printed Name and Title: Tim Hyland, Natural Resource Program Manager