Section VIII

Summary of Corrections to the DEIR

Chain fern (***Woodwardia fimbriata***) and deer fern (***Blechnum spicant***) are found in moister microsites and are not common enough to include in the Series description on page 129 of the DEIR; therefore the first paragraph in the Redwood Series description should not include chain fern ***(Woodwardia fimbriata)*** and deer fern ***(Blechnum spicant).***

According to Teresa Scholars of College of the Redwoods (Public Comment Letter TS-105), vine maple does not occur on JDSF. The first paragraph in the Red Alder Series (page 131 of the DEIR), second-to-last sentence should not include vine maple ***(Acer circinatum)***.

According to CDF personnel, Sitka spruce (***Picea sitchensi)*** should not be included in first paragraph, second sentence of the Red Alder Series (page 131 of the DEIR).

It is true that Monterey pine (***Pinus radiata***) is planted as an ornamental in Mendocino County. CDF personnel recently communicated that the experimental plantings of Monterey pine are not believed to have spread or naturalized enough to be considered part of the Bishop pine community. The first paragraph in the Bishop Pine Series (page 133 of the DEIR), should not include, Monterey pine ***(Pinus radiata).***

Section 6.2.1, on page 134, "Invasive Exotic Species" of the DEIR should include the following:

> Invasive exotic species can cause negative impacts to native species assemblages and can greatly impact native diversity. Rare native plant species that are associated with forest clearings are especially vulnerable to displacement by exotic invasives. Such rare plants include Humboldt milk-vetch (***Astragalus agnicidus***), Bolander's reed grass (***Calamagrostis bolanderi***), and maple-leaved checkerbloom (***Sidalcea malachroides***).
>
> There are currently five species of invasive exotic plants that occur in substantial frequency across the JDSF. All are on the California Exotic Pest Plant Council (CalEPPC) List A-1 (the most-invasive wildland pest plants with widespread occurrence). These are pampas grass (***Cortaderia jubata***), Scotch broom (***Cytisus scoparius***), French broom (***Genista monspessulana***), yellow star-thistle (***Centaurea solstitialis***), and Tasmanian blue-gum (***Eucalyptus globosus***).
>
> Additional List A-1 species that occur on JDSF and have the potential to become more invasive on the Forest are Himalayan blackberry (***Rubus discolor***), gorse (***Ulex europaea***), English ivy (***Hedera helix***), wild fennel (***Foeniculum vulgare***) and tamarisk (***Tamarix spp***.). Gorse occurrence is currently limited to the Western WWAA. Another List A-1 plant, Cape-ivy (***Senecio mikanioides***), is known to be located in two isolated places within JDSF.

All of the above-listed A-1 species are widespread throughout much of California (with pampas grass and Cape-ivy restricted primarily to the coastal regions); all thrive in disturbed habitats. The various roads and skid trails, forest openings, and other ground-disturbed areas provide habitat for further infestation by invasive species.

List A-2 (the most invasive wildland pest plants in regional areas) plants known on JDSF are cotoneaster (***Cotoneaster spp***.) and pennyroyal (***Mentha pulegium***). Both occur with enough frequency to become a problem on the Forest.

Beginning in DEIR Section 6.2.1 on page 134, the following species should be included alphabetically among the existing species accounts in this section:

Cotoneaster spp.--***cotoneaster*.** Native to China, cotoneaster is a popular shrub or small tree in local landscaping. This member of the rose family (***Rosaceae***) has small pink to white flowers producing heavy crops of bright orange to red berries, which are attractive to birds and wildlife. ***C. franchetti*** has escaped into our coastal forests, where it readily becomes naturalized. Spreading rapidly by seed and root sprouts, it becomes a problem by displacing native shrubs (Pickart and Eicher 2000). Rosatti (in Hickman 1996) reports ***C. pannosa*** as also occurring in mixed-evergreen forests of the region. The CalEPPC List A-2 also registers ***Cotoneaster lacteus*** as occurring in many coastal plant communities. Additional Cotoneaster species, in general, are included by CalEPPC on its List of Exotic Pest Plants of Greatest Ecological Concern that Need More Information.

Cotoneaster is common in the region, and frequently observed on JDSF (Public Comment Letter TS-105).

Foeniculum vulgare--wild fennel. Wild fennel is in the carrot family (***Apiaceae***). Native to southern Europe, wild fennel is widely escaped from cultivation in the Western Hemisphere, and is locally abundant and invasive (Hickman 1996). Wild fennel is perennial, with flower stalks growing to more that 3 m tall. It smells strongly of licorice or anise. Wild fennel invades roadsides and disturbed sites where it out-competes native plants. This List A-1 weed spreads by seed, and persists because of its strong taproot. By comparison, the cultivated garden herb, fennel (***Foeniculum dulce***), is classified as non-invasive by CalEPPC.

T. Sholars (Public Comment Letter TS-105) has observed wild fennel occurrence on the Forest, and considers it to have the potential to become a problem there.

Hedera helix--English ivy. English ivy is a shiny-leaved, woody vine belonging to the ginseng family (***Araliaceae*).** Palmately-lobed leaves are borne on juvenile stems, while those on mature stems are generally entire. Native to Eurasia, this plant was introduced to North America by early European settlers (Hickman, 1993). English ivy is usually first established in a disturbed site, then aggressively spreads to the surrounding forest by vegetative growth as well as by seed from its black berries. There are no natural controls for English ivy. The vines grow along the ground engulfing and smothering all shrubs,

grasses, and forbs by its overgrowth. The vines attach to trunks of larger shrubs and trees by aerial rootlets, and continue to grow upwards reaching for sunlight. The woody vines encircle tree trunks, inhibiting tree growth and vigor. The ivy vines also spread over the branches and foliage of the tree canopy. Native plant life becomes smothered and dies beneath the dense growth of English ivy. Such habitats are commonly alluded to as "ivy deserts."

English ivy is known to occur in the region and on the forest; and can be a serious forest pest (especially in riparian areas) where it can out-compete, overgrow, and kill the understory plants, as well as the trees, of the forest canopy.

Mentha pulegium--pennyroyal. Pennyroyal, a member of the mint family (***Lamiaceae),*** has upright to trailing stems producing relatively short flowering spikes (up to one foot or taller) with lavender-colored flowers arranged in progressively larger globular flower heads down the stalk. All parts of the plant have a strong characteristic minty odor.

It has invaded local wetlands and moist areas along roadsides and ditches. Because of the many resprouts from its rhizomes (underground stems), this species can form dense, impenetrable mats that choke out native plants (Pickart and Eicher 2000). T. Sholars (Public Comment Letter TS-105) reports that pennyroyal occurs with enough frequency in JDSF to pose a threat in favorable sites.

Tamarix spp.--tamarisk or salt cedar. Tamarisk is in its own family, the ***Tamaricaceae***. It is a shrub or tree with minute leaves and flowers. Wilken (in Hickman 1996) reports two species of tamarisk that occur regionally: ***T. parviflora*** from southeastern Europe (< 5 m tall), and the less common ***T. gallica*** that is native to southern Europe (< 8 m tall). Using a hand lens, the two can be readily differentiated by their floral parts that are in 4's and 5's, respectively. Tamarisk prefers sunny sites with good soil drainage. Both species can be found in washes and along roadsides (***T. gallica*** less commonly. ***T. parviflora*** is also found on slopes and sand dunes, while ***T. gallica*** prefers flats). Tamarisk is used horticulturally for windbreaks and is planted as an ornamental. It readily escapes into wildlands, where the deep roots lower the water table to out-compete shallow rooted natives.

Known to occur on JDSF (Public Comment Letter TS-105), tamarisk potentially could become invasive.

The following corresponding reference should be added to the references section of the DEIR:

Pickart, A. and A. Eicher. (2000). ***Invasive Weeds of Humboldt County: A Guide for Concerned Citizens***. 14 pages Arcata: Bug Press.

[Per Response to Comment 105.3] Section 6.2.1, on Page 136, "Invasive Exotic Species" of the DEIR should include the following species:

> ***Rubus discolor***--Himalayan blackberry. Himalayan blackberry is a robust, evergreen, arched bramble in the rose family (***Rosaceae***). Its brambles can grow to 3 meters tall (Munz and Keck 1959). Stems are 5-angled, 5 to 15 mm in diameter, and contain many prickles (Hickman 1993). Leaves are compound (often with five leaflets but sometimes three), sharply toothed, and white below. Inflorescences are many-flowered panicles of white to pink flowers. Fruits are shiny black drupelets clustered in an oblong shape (Hickman 1993, Munz and Keck 1959). Plants inhabit a variety of disturbed habitats at less than 1,600 meters in elevation and are native to Eurasia (Hickman 1993). Apparently, rats favor them for food and shelter.
>
> The common occurrence of Himalayan blackberry within some areas of the JDSF (DFG comments on JDSF DEIR, and Public Comment Letter TS-105) indicates that it can spread readily on the Forest. This species has the potential to spread primarily to areas that are near existing concentrations and where openings are maintained for a sustained period of time.

The following should be included in Appendix 8D-3 of the DEIR:

- Add ***Gentiana setigera*** "Mendocino gentian," CNPS list 1B, RED 3-2-2, State None, Federal None, Decision and Rationale: Watch for (Lower Montane Coniferous Forest and Meadows / mesic in northern Mendocino and Del Norte Cos.; public comment letter TS)-
- Add ***Howellia aquatilis*** "water howellia," CNPS list 2, RED 3-2-1, State None, Federal FT, Decision and Rationale: Watch for (freshwater marshes and swamps in northeastern Mendocino Co.; public comment letter TS)-
- Change the Decision and Rationale row for Microseris borealis to state: "Watch for Bogs and Fens, Lower Montane Coniferous Forest, Meadows."

Occurrences of murrelets in Mendocino County and in the vicinity of JDSF have been updated with the following information and should be added to the end of third paragraph on page 248 of the DEIR:

> Birds have also been detected at Alder Creek, Admiral Stanley State Park, Branscomb reserve, Big River, Greenwood Creek, Gualala River, and Garcia River (J. Stein pers. comm in K. Nelson's Comment dated July 15, 2002; comment SN-200). No specific information, such as observer, survey type, dates, numbers and type of detections, etc., was provided.

[Per Response 236.6A] The Plant Species of Concern list (page 143 of the DEIR) should be revised to read as follows:

Plant and Lichen Species of Concern

- ***Arctostaphylos mendocinoensis,*** **"**pygmy manzanita**"**
- ***Astragalus agnicidus,*** **"**Humboldt milkvetch**"**
- ***Calamagrostis bolanderi,*** **"**Bolander's reed grass**"**
- ***Campanula californica,*** **"**swamp harebell**"**
- ***Carex californica,*** **"**California sedge**"**
- ***Cupressus goveniana ssp. pigmaea,*** **"**pygmy cypress**"**
- ***Lilium maritimum,*** **"**coast lily**"**
- ***Lycopodium clavatum,*** **"**running-pine**"**
- ***Mitella caulescens,*** **"**leafy-stemmed mitrewort**"**
- ***Pinus contorta ssp. bolanderi,*** **"**Bolander's pine**"**
- ***Usnea longissima,*** **"**long-beard lichen**"**

[Per Response 236.6B] The Decision and Rationale column in Appendix 8D-3 of the DEIR for the ***Lycopodium clavatum*** row should read: "Known."

[Per Response 236.6D] The scoping, survey, and mitigation process should allow for inclusion of species that are not on Table 14, so addition and removal of sensitive species to and from Table 14 should not affect protection of sensitive species. After reviewing DFG's comments and available habitat information, CDF concurs that it is reasonable to remove the above-mentioned species from Table 14. Table 14 of the DEIR will have the following species removed based on best available current knowledge of the species range and likely habitat: ***Arenaria paludicola*** "marsh sandwort," ***Castilleja mendocinensis*** "Mendocino coast Indian paintbrush," ***Horkelia marinensis*** "Point Reyes horkelia," ***Limnanthes bakeri*** "Baker's meadowfoam," ***Navarretia leucocephala*** ssp. ***bakeri*** "Baker's navarretia," and ***Phacelia insularis*** var. ***continentis*** "North Coast phacelia." Of the above, only ***Castilleja mendocinensis*** and ***Horkelia marinensis*** are in the DFMP list. ***Limnanthes bakeri*** was mistakenly listed in Table 14 but was listed in Table 15 as "Unlikely."

In Appendix 8D-1 of the DEIR, the following species descriptions should not be included: ***Arenaria paludicola*** "marsh sandwort," ***Castilleja mendocinensis*** "Mendocino coast Indian paintbrush," ***Horkelia marinensis*** "Point Reyes horkelia," ***Navarretia leucocephala*** ssp. ***bakeri*** "Baker's navarretia," and ***Phacelia insularis*** var. ***continentis*** "North Coast phacelia." ***Limnanthes bakeri*** was not included in Appendix 8D-1.

The Decision and Rationale column of Appendix 8D-3 should include the following:

- (***Arenaria paludicola***) "Unlikely (misidentification for Mendocino Co., according to DFG comments for the DEIR)**"**
- (***Horkelia marinensis***) "Unlikely (coastal dunes, coastal prairie, coastal scrub/sandy)"

- (***Navarretia leucocephala*** ssp. ***bakeri***) "Watch for (meadows, valley and foothill grassland)"
- (***Phacelia insularis*** var. ***continentis***) "Unlikely (coastal bluff scrub, coastal dunes, sandy soils, and bluffs)"
- Note that no change is needed for the Decision and Rationale for excluding ***Castilleja mendocinensis*** and ***Limnanthes bakeri*** from Table 14; they are already listed as "unlikely."

[Per Response 236.6E] Table 14 should be titled, "SPECIAL STATUS PLANT AND LICHEN SPECIES WITH POTENTIAL OCCURRENCES WITHIN JDSF" and should include long-beard lichen. Table 14 of the DEIR should include the following:

- ***Boschniakia hookeri*** "small groundcone," CNPS list 2, RED 3-1-1, State None, Federal None
- ***Glyceria grandis*** "American manna grass," CNPS list 2, RED 3-1-1, State None, Federal None
- ***Usnea longissima*** "long-beard lichen," CNPS None, RED None, State None, Federal None

An extra sentence should be inserted in the DEIR just after Table 14 that discussed the ranking that qualifies this lichen to be considered sensitive. The sentence in the DEIR should state:

> Usnea longissima is considered a sensitive lichen due to a Global Rank of G3 (21-100 element occurrences OR 3,000-10,000 individuals OR 10,000-50,000 acres) and a State Rank of S2.1 (6-20 element occurrences OR 1,000-3,000 individuals OR 2,000-10,000 acres; very threatened) as listed in DFG's Special Vascular Plants, Bryophytes, and Lichens List (Natural Diversity Database July 2002).

Appendix 8D-1 should be titled, "Species descriptions for rare, threatened, endangered, and sensitive plant and lichen species potentially occurring on JDSF."

The following species should be included in Appendix 8D-3 of the DEIR:

- ***Boschniakia hookeri*** "small groundcone," CNPS list 2, RED 3-1-1, State None, Federal None, Decision and Rationale: Likely (recent detection in coastal forest in Mendocino Co. according to DFG comments for the DEIR)
- ***Glyceria grandis*** "American manna grass," CNPS list 2, RED 3-1-1, State None, Federal None, Decision and Rationale: Likely (forested riparian areas and wetlands)
- ***Usnea longissima*** "long-beard lichen," CNPS None, RED None, State None, Federal None, Decision and Rationale: Known (recent detection on JDSF by DFG Environmental Scientist Ms. Clare Golec)

[Per Response 236.6F] According to DFG comments, the following ***"Angelica lucida, Antirrhinum virga, Asclepias solanoana, Astragalus breweri, Calystegia collina ssp. oxyphylla, Clarkia gracilis ssp. tracyi, Cypripedium californicum, Eriogonum strictum var. greenei, Eriogonum umbellatum var. bahiiforme, Eschscholzia hypecoides, Gilia sinistra ssp. pinnatisecta, Glehnia littoralis ssp. leiocarpa, Hackelia amethystine, Linanthus rattanii, Lomatium engelmannii, Melica spectabilis, Mimulus nudatus, Navarretia cotulifolia, Navarretia subuligera, Orobanche valida ssp. howellii, Silene campanulata ssp. campanulata, Stellaria littoralis, Streptanthus barbiger, Streptanthus drepanoides***." are not likely to occur on JDSF. Table 15 should not include the above species.

[Per Response 236.6G] Two "CNPS List 3" species that were included in Appendix 8D-3 should be included in Table 15, as follows:

- ***Cardamine pachystigma*** var***. dissectifolia***, Common Name: dissected-leaved toothwort, Family***: Brassicaceae***

- ***Hemizonia congesta*** ssp***. leucocephala***, Common Name: Hayfield tarplant, Family: Asteraceae

Table 15 should be titled, "Table 15: CNPS List 3 and 4 species that may potentially occur within JDSF." No other "CNPS List 3" species, except the above two, resulted from the query of the CNPS Inventory for the project and adjacent quadrangles. However, DFG indicates that the following additional List 3 plant specie has the potential to occur on JDSF (Pers. Com CDFG September 3, 2002): ***Erigeron biolettii,*** common name: streamside daisy.

Other List 3 species may also potentially occur on the JDSF based on habitat requirements. Sensitive plant species that are not listed in Table 14 or Table 15, but that have the potential to occur on JDSF, will be addressed through the adaptive nature of the proposed scoping, survey, and mitigation process with input from DFG.

With the addition of List 3 species to Table 15, it is appropriate to add text to the paragraph before Table 15 to incorporate List 3 species into the scoping process. The paragraph before Table 15 (found on page 138 of the DEIR) should include the following sentence, "In addition, species that are listed by CNPS as plants about which we need more information (List 3) and plants of unlimited distribution (List 4) should be considered during scoping."

[Per Response 236.6H] As with Table 14, Table 15 should contain species that are likely to occur on the JDSF and exclude species that are not as likely to occur. Therefore, based on DFG's comments and recommendations, Table 15 of the DEIR should not include the following species:

> ***Angelica lucida, Antirrhinum virga, Asclepias solanoana, Astragalus breweri,, Calystegia collina*** ssp. ***oxyphylla, Clarkia gracilis*** ssp. ***tracyi, Cypripedium californicum, Eriogonum strictum*** var. ***greenei, Eriogonum umbellatum*** var. ***bahiiforme, Eschscholzia hypecoides, Gilia sinistra*** ssp. ***pinnatisecta, Glehnia littoralis*** ssp. ***leiocarpa, Hackelia amethystine, Linanthus rattanii,***

> ***Lomatium engelmannii, Melica spectabilis, Mimulus nudatus, Navarretia cotulifolia, Navarretia subuligera, Orobanche valida*** ssp. ***howellii, Silene campanulata*** ssp. ***campanulata, Stellaria littoralis, Streptanthus barbiger, Streptanthus drepanoides.***

[Per Response 236.6I] In the DEIR, the second sentence of the Federal and State-listed Plant Species paragraph (on page 139 of the DEIR) should read, "Five additional plant species are considered by the State of California to be endangered or rare." The following sentence should also be included in that paragraph: North Coast semaphore grass (Pleuropogon hooverianus) is a state listed rare species and is a candidate for state listed endangered.

To clarify the DEIR, the last sentence in the Scoping section (page 145 of the DEIR) should include the following:

> In general, the pre-project scoping process will include DFG input referencing Tables 14 and 15 of the EIR, Appendix 8D-1 and 8D-3, available database information from the California Natural Diversity Database and CNPS Inventory , and other sources of sensitive plant habitat and occurrence data.

The Decision and Rationale column of Appendix 8D-3 in the DEIR should include: ***Erigeron supplex*** "Watch for in coastal prairie/coastal bluff scrub"(according to GJ-236)

[Per Response 236.10A] To clarify that pygmy forests can be considered wetlands, the following should be the second-to-last sentence in the fourth paragraph on page 128 of the DEIR: Swamps (tree-dominated areas, such as on portions of alluvial redwood floodplains) and pygmy forests, can also constitute as wetlands, depending on site conditions. In the same respect, the following should be the second-to-last sentence in the Wetlands section (page 211, section 6.5.1 Setting, second paragraph) of the DEIR: It is likely that some poorly drained areas in the pygmy forest also meet wetland criteria. This sentence is a direct quote from page 15 of the DFMP's Wetlands section.

[Per Response 236.10B] To incorporate ideas that increase awareness of the sensitive nature of the Pygmy Cypress Series, page 132 of the DEIR should state:

- Mendocino pygmy forest, a unique ecological system recognized by the California Natural Diversity Database as a sensitive plant community type, occurs only in coastal Mendocino County.
- Pygmy cypress (***Cupressus goveniana*** ssp. ***pygmyaea***) is a common component in the canopy for Pygmy Cypress Series (Sawyer and Keeler-Wolf 1995)/pygmy forest (Jenny et al. 1969) and is a CNPS list 1B species
- Shrub species are common and can include hairy manzanita (Arctostaphylos columbiana), pygmy manzanita (***Arctostaphylos mendocinensis***; a CNPS list 1B species)
- The herbaceous layer can also include two CNPS list 1B species, swamp harebell (Campanula californica) and coast lily (***Lilium maritimum***).

- It is likely that some poorly drained areas in the pygmy forest also meet wetland criteria." As mentioned above, this sentence is a direct quote from page 15 of the DFMP.

[Per Response 236.10C] To clarify that running-pine (***Lycopodium clavatum***) is not limited to seeps and microsites, page 134 of the DEIR, the applicable section should read as follows: Some sensitive plant species, such as pygmy manzanita, show a great affinity to the pygmy forest, while others, such as swamp harebell, can be found in both pygmy forests and less site-specific habitats. The remaining sentences in this same paragraph should read:

> The restrictions on activities in WLPZs will provide a measure of protection to some species that are generally restricted to riparian areas or wetlands, such as livid sedge. Some species, such as coast fawn-lily and running-pine, are forest generalists and would not necessarily be protected by WLPZ SCAs. Forest openings also provide potential habitat for the endangered Humboldt milkvetch ***(Astragalus agnicidus).***

[Per Response 236.10D] To clarify potential concerns as to how the CNPS lists are compiled and why they should be incorporated into the scoping, survey, and mitigation process, the following text should be included after the last sentence of the paragraph on page 138 of the DEIR:

> The CNPS lists are developed through a formal review process involving a scientific advisory committee composed of noted academic, professional, and amateur botanists across the state. The scientific advisory committee reviews the best available data to compile rare, endangered, threatened, and uncommon plant lists. CDFG currently accepts the premise that placement of plants on CNPS lists 1A, 1B and 2 provides a fair argument that they qualify as rare, endangered or threatened under Section 15380(d) of CEQA (CDFG, comments on DEIR, 2002).

[Per Response 236.10E] The following should be included in the last sentence in the NPPA paragraph (page 140 of the DEIR):

> Other management activities may not be exempted from Fish and Game Code Section 1911 (Fish and Game Code Section 1913). Regardless of the exemption allowed to THPs under Fish and Game Code Section 1913, it is the stated intent of JDSF to address sensitive plants and their habitats on a project basis through scoping in consultation with DFG, surveys according to appropriate survey guidelines where indicated by the results of scoping, assessment of potential impacts, and avoidance or mitigation to reduce impacts to level less than significant.

[Per Response 236.10F] The following should be inserted after the second sentence in the CEQA paragraph for the final EIR (page 140 in the DEIR):

> CEQA Guidelines Section 15380(b) provides the criteria for Endangered, Rare and Threatened species. Section 15380(d) states that species that are not on state or federal lists, but that meet the criteria in subsection (b) of Section 15380, "shall nevertheless be considered to be endangered, rare, or threatened." CNPS List 1A, 1B, and 2 plant species will be initially presumed to meet these criteria, subject to review and reassessment during scoping. Additionally, under Section 15380, a species will be considered Endangered, Rare or Threatened if it is listed as such under the California or Federal Endangered Species Act and species designated as candidates for listing by the Fish and Game Commission under the CESA are also "presumed to be endangered, rare or threatened." The California ESA presumes that candidate species meet the criteria for listing as Endangered, Rare, or Threatened.

[Per Response 236.10G] To incorporate specific survey protocol and address the goals of adaptive management and of inventory stated for the JDSF, the following should be included on pages 143 and 144 after the first sentence in the paragraph in the DEIR:

> Survey designs will be based on the concepts contained in the DFG Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Plant Communities (DFG 2000). Surveys conducted as part of THP development will follow the practices commonly accepted by CDF and CDFG for THP review. Surveys for other types of projects will recognize the specific features of those projects. [For example, road surface maintenance and roadside brushing are ongoing activities that create repeated periodic disturbances, precommercial thinning typically occurs a few years following the more substantial disturbance of a commercial harvest, and shaded fuel break construction targets ground cover vegetation].
>
> That paragraph should also include: Observations of rare, threatened or endangered plants or plant communities will be recorded on Field Survey Forms and copies provided to CDFG 's California Natural Diversity Database (CNDDB)

To clarify and maintain consistent language regarding the need for pre-project botanical assessment, in the EIR, the phrase "As resources allow" is removed from the first sentence of the last paragraph in the "Plant Species of Concern Possibly Present on JDSF" section (page 144 of the DEIR). This will not significantly alter the intent of the EIR. The stated phrase is also part of a sentence under the "Plant and Animal Species of Concern Possibly Present on JDSF" section in the Management Plan (page 68 of the DFMP) that is presented for a variety of sensitive plant and animal species. It is appropriate to leave the phrase intact in the Management Plan while removing the phrase in the portion of the EIR that discusses pre-project assessments for sensitive plant species.

Additionally, the paragraph under the "Surveys" section of the DEIR should reflect the clarification that currently-accepted survey protocol should be used as guidance in formulation of survey (page 145 of the DEIR), as follows:

> When suitable habitat is present within or immediately adjacent to the project area, project-planning documentation will include surveys based on the concepts contained in the DFG Guidelines, and a discussion of the efforts made to determine presence or absence of the species in question. An assessment area that extends beyond the boundaries of the planned activity may also be required for some species.

[Per Response 236.10H] The paragraph regarding Habitat Management Practices (page 144 of the DEIR) should read:

> Limited removal of species in the pygmy cypress forest may occur as a result of habitat development projects for the Lotis blue butterfly. Prior to habitat development projects, rare plant surveys will be conducted according to accepted survey guidelines (see previous section) to address sensitive plant resources. A qualified botanist will assess the appropriateness of removal of any sensitive plant species in relationship to fostering habitat for the growth of the butterfly's host species, Lotus formosissimus. Effectiveness monitoring will be conducted for any habitat management practice involving removal of plant species in the pygmy forest to assess the response of the forest to habitat alteration.

[Per Response 236.10I] To clarify the treatment of (rare, threatened, and endangered) unlisted species, the first sentence in the Guidelines for Species Surveys and Avoidance of Significant Impacts section (on page 144 of the DEIR) should read:

> The DFMP includes guidelines for pre-project scoping, surveying, and mitigation development. These guidelines are included below. Rare, threatened and endangered species, as defined by Section 15380 of the CEQA Guidelines, will be addressed during the scoping, surveying, and mitigation-development processes. For species that do not meet the Section 15380 definitions of a rare, threatened, or endangered species but that are CNPS list 3 or 4 species, evaluation, scoping and mitigation practices are likely to vary according to identified need, the current state of species knowledge, and consideration of input provided by CDFG through the scoping process.

The Guidelines for Species Surveys and Avoidance of Significant Impacts section should not include the bulleted sections titled "Listed Species" and "Unlisted Species" on page 144 of the DEIR. The sentence at the end of the "Listed Species" bullet that states, "An assessment area that extends beyond the boundaries of the planned activity may also be required for some species" should be included in the Survey section (on page 145 of the DEIR).

[Per Response 236.10J] The paragraph under the California Forest Practice Rules (page 145 of the DEIR) should include the following sentence:

> The FPR state "Where significant adverse impacts to non-listed species are identified, the RPF and Director shall incorporate feasible practices to reduce impacts as described in 14 CCR 898." (Sections 919.4, 939.4, and 959.4 of the California Forest Practice Rules, 2002).

[Per Response 236.10K] The last two sentences in the Impacts introductory paragraph (page 146 of the DEIR) should read:

> An intensive inventory of the botanical resources has not been conducted on JDSF; inventory is planned to occur on a project-by-project basis through surveys patterned after currently accepted protocol. Potential impacts to botanical resources will be addressed at the project implementation level through pre-survey scoping in consultation with DFG, surveys, and development of measures that avoid or mitigate impacts to sensitive plant species.

The Impact 3 and 4 sections (pages 146 and 147 of the DEIR) provide quantification of species that show great affinity to the pygmy forest or SCA's, which species show Mendocino County as the end of their range, and which are known from only this county. To clarify, the number of species in each category should not be included. The fourth sentence in the first paragraph at the top of page 147 of the DEIR (that discusses sensitive species that are protected by default of habitat preference) should read: Some sensitive plant species, such as pygmy manzanita, show a great affinity to the pygmy forest, while others, such as swamp harebell, can be found in both pygmy forests and less site-specific habitats. The remaining sentences in this same paragraph should read:

> The WLPZs will provide a measure of protection to some species that are generally found in riparian areas or wetlands, such as livid sedge. Some species, such as coast fawn-lily and running-pine, are forest generalists and would not necessarily be protected by SCAs.

In the first paragraph in the Impact 4 section on page 147 of the DEIR, the second and third sentences should read:

> Some species, such as Humboldt milkvetch, that have the potential to occur on the JDSF are at the end of their range in Mendocino County, and some, including pygmy manzanita and pygmy cypress, are only known from Mendocino County.

The Impact 3 and 4 sections (pages 146 and 147 of the DEIR) are not specific as to which sensitive plant species will be addressed during the scoping, survey, and mitigation development processes.

The last paragraph of the Impact 4 section (page 147 of the DEIR) should read as follows:

> As discussed above, JDSF has committed to completing a scoping process, including rare plant surveys as necessary, on a management activity or project basis to determine if the management activity or project has the potential to significantly impact a listed or unlisted species that meets the definition of rare, threatened, or endangered under CEQA Guidelines or California Fish and Game Code. JDSF has also committed to developing mitigation measures for the protection of endangered, rare, or threatened plants (as defined previously) and potential habitat if they are identified.

The results of the CNDDB query completed in preparation of this document (see page 225 of the DEIR) did not indicate that murrelets occur in the vicinity of Russian Gulch State Park. However, based on the new information provided in the comments to the DEIR and through discussion with Rene Pasquinelli (Senior Park Ecologist) of the Russian Gulch State Park, the language of the first paragraph on page 248 was incomplete. The following paragraph presents additional information to that portion of the DEIR and should be included:

> There have been numerous inland detections near JDSF. The first detection was in Russian Gulch State Park in 1976 (Paton and Ralph 1988), and the second detection was apparently 1km (0.6mi.) east of the town of Mendocino in 1988 (F. Sharpe, personal communication, as cited in Paton and Ralph 1988). According to Rene Pasquinelli (Personal communication), surveys completed annually over the last five years within Russian Gulch State Park have detected numerous murrelets flying up the Russian Gulch drainage, including "occupied behavior" type observations. Although no nest trees have been identified, this information suggests that murrelets are nesting in the Russian Gulch State Park.

Additionally, the following sentence adds to the information contained in the second paragraph on page 248 of the DEIR: "However, potential murrelet habitat was identified by Ken Hoffman (USFWS) on former G-P lands in the vicinity of the Mendocino Woodlands Recreation Area (R. Pasquinelli, Personal Communication)."

The DEIR presents information on the existing conditions of JDSF in relation to Marbled Murrelet (MAMU) presence and potential habitat that may support MAMU. A discussion regarding the decline of murrelets and their habitat in the region is also included. A discussion on the current regulatory framework is provided indicating that USFWS must be consulted where it is likely that a project could affect federally listed species. For the purpose of clarification, the DEIR should also have stated that the consultation with DFG is required.

The next to last paragraph on DEIR page 109 should read as follows to maintain consistency between the documents:

> JDSF contains approximately 7,440 acres of riparian zone within 150 feet and 100 feet of Class I and Class II watercourses respectively. Of these approximately:
>
> - 22% are in CWHR size class 6 [multi-storied with a Quadratic Mean Diameter (QMD) >24 inches DBH];
> - 41% are in CWHR size class 5 (QMD >24 inches DBH);
> - 22% are in CWHR 4 (QMD 11-24 inches DBH);
> - 11% are in CWHR 3 (QMD 6-11 inches DBH);
> - 3% are in CWHR size classes 2 (QMD 1-6 inches DBH);
> - <1% is in CWHR size classes 1 (QMD <1 inch DBH) and
> - 1% is in pygmy forest, grass, and brush.

CWHR 5 and 6 stands, which compose 71% of Class I and 57% of Class II watercourse WLPZ vegetation types, are many times considered representative of late successional habitat (see Section VII-6.6: Wildlife).

There are 9,680 acres of special concern areas that will be managed to develop late seral characteristics. This acreage represents the area within the following special concern areas:

- old growth groves (459 acres),
- late seral development areas (780 acres)
- Woodlands Special Treatment Area (2,241 acres (2,511 acres minus the 270 acres of the Railroad Gulch study)), and
- Class I and II WLPZ (6,200 of the total 7,440 WLPZ acres that do not overlap other late seral development areas).

Paragraph 2 on page 107 should include the wording, "The California Department of Fish and Game has conducted a status review of coho salmon in the California Central Coast Evolutionarily Significant Unit and has recommended the species be listed as endangered under CESA."

The following passage supercedes the first paragraph of DEIR Appendix 8C, page 16:

> Gallagher (2002) reported the results of the 2000-2001 spawner surveys and generated adult coho salmon and steelhead population estimates using two different methods. The steelhead redd-based estimate ranged from 258(±7) to 583 (±16) with an Area Under the Curve (AUC) estimate of 127-416. The redd-based coho population was estimated to be 555 (±16) with the AUC estimate being 592. Almost twice as many steelhead redds and many more times coho redds were observed during 2000-2001 surveys than the 2000 period (Gallagher 2002). This was attributed to the Gallagher (2000) surveys not starting until late-February and not being able to survey the entire river (Gallagher 2002).

To correct the text in Appendix 8B, page 11, and in order to be consistent with page 122 of the DEIR, the following language should be included in the Appendix:

> Fish populations can be extirpated from watercourses and watersheds if conditions degrade to a point the stocks are no longer self-sustainable. However, nearly two-thirds of the entire land base within the JDSF was clear-cut and burned prior to the introduction of the modern FPRs. Historic activities included massive broadcast burning, road construction and log skidding in watercourses, splash damming, stream clearing, and complete removal of riparian canopy. No effort was made to protect fish stocks at that time and populations did suffer. During the first season of operation the Noyo River egg taking station recorded a 1962-1963 coho run of 1,191 adults and 2,501 grilse. This indicates fish populations were able to maintain viability, albeit at low numbers, through that unregulated logging period. The potential effects to fish populations and aquatic communities from each alternative are significantly less than pre-modern FPR operations.

To clarify the last paragraph in the DEIR for the Humboldt milkvetch species description in Appendix 8D-1, the following paragraph supercedes the first four sentences in the paragraph:

> Current population and trend for Humboldt milk-vetch are declining (CDFG 2000a). Monitoring of population trend has occurred for the population on the private ranch south of Miranda in Humboldt County, but no formal monitoring has been conducted for the populations on the JDSF. JDSF staff has, however, made numerous informal observations of the population for several years.

The results of the CNDDB query completed in preparation of this document (see page 225 of the DEIR) did not indicate that murrelets occur in the vicinity of Russian Gulch State Park. However, based on the information provided in comments on the DEIR and through subsequent discussion with Rene Pasquinelli (Senior Park Ecologist) of the Russian Gulch State Park, the language of the first paragraph on page 248 of the DEIR should read as follows:

> There have been numerous inland detections near JDSF. The first detection was in Russian Gulch State Park in 1976 (Paton and Ralph 1988), and the second detection was apparently 1km (0.6mi.) east of the town of Mendocino in 1988 (F. Sharpe, personal communication, as cited in Paton and Ralph 1988). According to Rene Pasquinelli (Personal communication), surveys completed annually over the last five years within Russian Gulch State Park have detected numerous murrelets flying up the Russian Gulch drainage, including “occupied behavior” type observations. Although no nest trees have been identified, this information suggests that murrelets are nesting in the Russian Gulch State Park.

A sentence should be added to the end of the second paragraph on page 248 of the DEIR to read as follows: However, potential murrelet habitat was identified by Ken Hoffman (USFWS) on

former G-P lands in the vicinity of the Mendocino Woodlands Recreation Area (R. Pasquinelli, Personal Communication).

The last sentence in the Scoping section (page 145 of the DEIR) should read:

> To be thorough, the pre-project scoping process will include referencing Tables 14 and 15 of the final EIR, Appendix 8D-1 and 8D-3, available database information from the CNPS Inventory and California Natural Diversity Database, and any other sources of sensitive plant habitat and occurrence data.

The following change should be made in the Decision and Rationale column of Appendix 8D-3 in the DEIR, "(for ***Erigeron supplex***) Watch for (coastal prairie/coastal bluff scrub***."***

The following passage should replace the last paragraph in the Pygmy Cypress Series section (page 132 of the DEIR):

> The fact that Bolander pine and pygmy cypress are surrounded by swaths of nondwarfed Bishop pine offers anecdotal evidence of fire ecology in the pygmy forest. The Bishop pine is a fire dependent species. Since the stands of Bishop pine are replaced after large fires, and since the pygmy forest species are surrounded by these stands, it is likely that the pygmy species can cope with some level of fire stress. It is unknown under which frequency, intensity, and scope of fire events the pygmy forest species could thrive. Further work on the life history of the pygmy forest species is also needed to understand the role of fire.

The California Geologic Survey (CGS) completed the map of "Relative Landslide Potential" for JDSF after the completion of the DFMP; therefore the data in the CGS map has not yet been incorporated. As stated in CDF's response to CGS, the Department agrees that the map should be utilized for the basis of defining "Special Concern Areas" within JDSF. This map will be referenced to and incorporated into future management decisions at JDSF. The map requires reconciliation with Figure H of the DEIR "Special Concern Areas Map." Incorporation of this statement serves to update the Geologic Section of the DEIR.