MENDOCINO COUNTY RESOURCE CONSERVATION DISTRICT

MITIGATED NEGATIVE DECLARATION/ INITIAL STUDY

FOR

MENDOCINO COUNTY PERMIT COORDINATION PROGRAM

May 4, 2012

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A. Mendocino County Permit Coordination Program Biological Opinion. National Marine Fisheries Service, Southwest Region. July 27, 2009.

B. Biological Assessment for the Mendocino County Permit Coordination Program: specific Information for Informal Consultation with the United States Fish and Wildlife Service. December 10, 2007.

C. Letter of Concurrence. United States Fish and Wildlife Service, Arcata Office. June 2, 2008.

Final Mitigated Negative Declaration

The Mendocino County Resource Conservation District (MCRCD or District) has reviewed the Mendocino County Permit Coordination Program (PCP) described below and determined that it will not have a significant effect on the environment, based on the Initial Study and the mitigated measures contained within. “Significant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Summary of Project Description

The Mendocino County PCP provides a platform for high-quality erosion control and habitat restoration throughout the watersheds of Mendocino County. The program, based on a model of coordinated, multi-agency regulatory review, ensures the integrity of agency mandates, while making permitting more accessible for working landscapes than the current, traditional process. It expands the successful Navarro River Watershed Permit Coordination Program countywide.

To implement the program, the District, working cooperatively with the U.S.D.A. Natural Resource Conservation Service (NRCS), will request programmatic permits and approvals from regulatory agencies to cover projects constructed according to a set of 10 specific, standardized conservation practices that will improve habitat and soil stability on farms, ranches, and forestland. Projects consistent with these conservation practices are relatively small in size, have demonstrated a net environmental benefit, and are usually performed for erosion control or habitat restoration in and around waterways. The 10 conservation practices include soil stabilization practices that are designed to improve the natural resource values of sensitive habitats at and further downstream of the work sites. MCRCD develops projects based on recommend land management practices from watershed plans, and landowners agree to follow MCRCD or NRCS designs and specifications for all proposed construction projects. This process results in high quality work and ensures follow up and monitoring on each conservation project by MCRCD or NRCS. MCRCD proposes that the Mendocino County PCP be permitted for 10 years, with a full evaluation of the program and summary report submitted to the regulatory agencies after five years of operation.

MCRCD and NRCS have estimated that up to 25 projects will be implemented under the PCP each year with up to 250 restoration projects completed by the ten year period. Projects that may adversely affect listed salmonids will be limited to 3-5 per year in each sub-watershed, depending on watershed size and predicted work focus.

Declaration of No Significant Impact

MCRCD has reviewed potential environmental effects of the PCP. Incorporated into this Mitigated Negative Declaration is an Initial Study in which potential impacts of implementation the PCP were evaluated. The Initial Study identified one potentially significant impact on rare, threatened, and endangered species in the Biological Resources section.

Mendocino County has 54 species of special-status animals and 111 species of special-status plants. Although the PCP is intended to benefit these species and the natural environment overall, impacts from project implementation are possible. Specific measures, described in the Initial Study, to avoid and minimize impacts that can typically occur from construction are incorporated into the PCP, including:

- General measures to protect special-status species.
- Measures to avoid and minimize adverse impacts on listed salmonids.
- Specific measures to protect special-status and common amphibians.
- Measures to avoid and minimize adverse impacts on California red-legged frog.
- Specific measures to protect special-status reptiles.
- Specific measures to protect special-status and common birds.
- Measures to avoid and minimize impacts on northern spotted owl.
- Measures to avoid adverse impacts on marbled murrelet.
- Specific measures to protect special-status and common bats.
- Specific measures to protect special-status plants.

The District finds these measures adequate to protect special-status species during implementation of the PCP practices. Based upon the detailed project description provided below, including environmental protection and mitigation measures and the results of the environmental assessment in the Initial Study, the District finds that the Mendocino County Permit Coordination Program, as mitigated, will not have a significant impact on the environment.

Geographic Scope of the Program

The Mendocino County Permit Coordination Program will cover all the county's private lands in watersheds from the Humboldt County line to the Sonoma County line and to the Lake County line in the east. The program will exclude the Coastal Zone, Point Arena mountain beaver habitat, and tidewater goby habitat. Watersheds where work is expected to take place are described using Calwater Version 2.21 Hydrologic Units (HUC8) with some units broken out into the major sub-watershed components that are present in Mendocino County; see Figure 1: Project Location Map. These watersheds include:

Russian River (18010110)
- Upper Russian

Gualala-Salmon (18010109)
- North Fork Gualala

Big-Navarro-Garcia (18010108)
- Garcia River
- Navarro River
- Albion River
- Big River
- Point Arena (Alder Creek, small coastal tributaries)
- Noyo River (includes Pudding Creek and Casper Creek)
- Rockport (Ten Mile River, small coastal tributaries)

Upper Eel River (18010103)

Middle Fork Eel River (18010104)

Lower Eel River (18010106)
- North Fork Eel River
- Middle Mainstem of Lower Eel
- South Fork Eel River (18010106)
- Mattole River (18010107)

Figure 1. Project Location Map

Annual Regulatory Review Process

Annually by May 15, MCRCD and NRCS will conduct a project identification and ranking process and preliminary assessment of potential impacts. A conceptual design will be developed for each project and submitted to regulatory agencies for review. Site visits will be arranged, upon request, to evaluate options and potential impacts. Input from regulators will then be incorporated into preliminary project designs.

Programmatic Permitting Mechanisms

To assist agricultural landowners with regulatory compliance, the MCRCD offers “one-stop permit shopping" in Mendocino County watersheds who agree to work under the guidance of the MCRCD or NRCS to achieve important water quality and habitat conservation and restoration goals. Approval of projects proposed for implementation under the program each year will be obtained from local, state, and federal agencies with jurisdiction over one or more of the 9 conservation practices included in the program. Following is a list of agencies that may issue permits under the permit coordination program and the type of permit or approval:

- California Department of Fish and Game – California Fish & Game Code §1602 Streambed Alteration Agreements and California Endangered Species Act (CESA) Consultation
- North Coast Regional Water Quality Control Board – Waste Discharge Requirements, Waivers of Waste Discharge Requirements, TMDL compliance determinations, or Clean Water Act §401 Certifications.
- U.S. Army Corps of Engineers – Clean Water Act §404 Nationwide Permits or Regional General Permits.
- U.S. Fish and Wildlife Service – Endangered Species Act (ESA) Section 7 Consultation/Incidental Take Statement.
- NOAA Fisheries – ESA Section 7 Consultation/Incidental Take Statement.

Specific permit terms and conditions will be included with the individual design standards and specifications for each project implemented under this program. They are included as conditions of the Cooperator Agreement between the landowner and the MCRCD or NRCS. Individual property owners and managers participating in this program are referred to as “cooperators.”

Project Notification to Regulatory Agencies

By May 15th of each year, MCRCD will provide the regulatory agencies listed above with a summary notification for all projects being constructed under the Permit Coordination Program (PCP) for that year. The notification will include the following information:

- Project identification location; ownership will not be identified on public review documents.
- Nature of work and description of project need.
- Approved practices to be installed.
- Location of work to be performed will be identified by subwatershed.
- Project dimensions (volume, length and area, if applicable).
- Approximate volume of discharge below the ordinary high water mark (OHWM).
- Total area of disturbance to be affected by the project.
- Quantitative assessment of temporary impacts on native vegetation, including number and size of trees, approximate species diversity, approximate coverage of herbaceous species, and relevant revegetation plans.
- Environmental setting – surrounding habitat, adjacent land use.
- Potential presence of listed species.
- Avoidance measures to be used during project implementation.

Regulators will have the opportunity to review individual design and construction specifications for each proposed project. They may request a meeting or site visit(s) and may provide additional conditions for inclusion in the individual Cooperator Agreements, which will be included as part of the individual project plan.

Procedures for Complying with Permit Conditions

Permit conditions will also be included in the Cooperator Agreement and the construction contract, and they will be summarized and reviewed with the construction crew prior to project implementation. A pre-construction crew orientation will provide all workers with information on sensitive resources, including rare, threatened, and endangered species and cultural resources, including specific protective measures to be followed during implementation of the project. The project boundaries will be clearly marked to avoid impacts on sensitive resources.

If a cooperator does not carry out work in compliance with project design standards and specifications, including the previously agreed upon terms and conditions, the MCRCD or NRCS will notify the cooperator and work directly with them to resolve the problem. If the cooperator still fails to conform, the MCRCD or NRCS will notify the cooperator that their activities are inconsistent with the standards and specifications contained in their agreements and that the cooperators' actions are no longer covered by the project's programmatic and individual permits. MCRCD or NRCS will notify the pertinent regulatory agencies in writing that the project is no longer covered by the PCP. The cooperator will then be responsible for obtaining regulatory review and individual permits from the appropriate regulatory agencies and will be held liable for any violations.

Environmental Protection and Mitigation Measures

The intent of the PCP and the associated conservation and restoration practices is to reduce erosion and sedimentation and to enhance habitat values in the watersheds of Mendocino County. Project implementation will maximize water quality and/or the health of the natural resources and will contribute to sustainable agricultural practices. However, any activity that involves work in an area with sensitive resources, no matter what the intent, has the potential for short-term adverse impacts. The permits issued for the program will specify conditions governing implementation of the conservation practices. These conditions may include temporal or seasonal constraints, limitations on the size or general location of the specified practices, or pre-construction notification for specific activities. The conditions will avoid or minimize the impact of the work on water quality and sensitive habitats and will ensure that regulatory agencies' mandates are honored. To further avoid or minimize any potential negative effects from project construction and operation on listed salmonids and their habitat, the following environmental protection measures will be incorporated when designing and implementing projects. Thorough environmental protection measures have been developed in coordination with regulatory agencies to prevent or reduce the environmental impacts of restoration under the permit coordination program. These protective measures are intended as minimum conditions that will be incorporated into the design and implementation of each site-specific restoration project under the permit coordination program. With the incorporation of the protective measures, any potential environmental effects of the permit coordination program are avoided or reduced to less-than-significant levels.

The minimum protective measures are described in detail below. They include general conditions such as temporal limitations on construction, limitations on earthmoving and construction equipment, guidelines for removal of plants and revegetation, conditions for erosion control, limitations on work in streams and permanently ponded areas, and limitations on use of pesticides, herbicides, and fertilizers. The MRCD and NRCS and participating regulatory agencies have developed the following measures that are intended to avoid or minimize program impacts on sensitive resources.

General Conditions to Avoid or Minimize Adverse Impacts

Temporal Limitations on Construction

- The timing of project construction during the year will be planned with full consideration of fish usage in the project area.
- To avoid migrating fish and sedimentation of the stream channel, the construction season will be from June 15 to October 15, although exceptions may be requested on a site-specific basis. Work prior to June 15 or beyond October 15 may be authorized for specific projects only with the agreement of NMFS and the California Department of Fish and Game (CDFG) and provided the work would be completed outside the rainy season, avoiding potentially rising stream flows and exposure of disturbed soils to significant rainfall.
- Work prior to June 15 or beyond October 15 may be authorized for specific projects only with the agreement of all permitting agencies, and provided the work would be completed outside the rainy season, avoiding potentially rising stream flows and exposure of disturbed soils to significant rainfall.
- Unless specified otherwise by the regulatory agencies, a 3-day (72-hour) forecast of rain will be the trigger for cessation of project construction and winterization/erosion protection of the work site.

- The usual June 15 through October 15 work period is extended as follows: Work may be conducted in or near the stream during the late season work period (October 15 through November 1), provided adherence to all permit conditions, and:
    - MCRCD/NRCS will complete any unfinished encroachment work, including erosion control measures, within 24 hours of CDFG directing the MCRCD or NRCS to do so.
    - Prior to any work at a site, MCRCD/NRCS will stockpile erosion control materials at the site. All bare mineral soil exposed in conjunction with operations will be treated for erosion immediately upon completion of work, and prior to the onset of precipitation capable of generating runoff. Erosion control will consist of at least 2 to 4 inches of weed-free straw with greater than 90% coverage.
    - Use of newly constructed crossings during the late season work period will cease when precipitation is sufficient to generate overland flow off the road surface, or when use of the crossing is causing rutting of the road surface. Crossing use will not resume until the road bed is dry, defined as a road surface that is no wetter than that found during normal dust abatement watering treatments and is not rutting or pumping fines or causing a visible turbidity increase in the stream or water sources leading to the stream. Emergency access will be allowed at any time to correct emergency road-related problems and other emergency situations.
    - Road construction leading directly into or out of a proposed stream crossing will only be performed when soils are sufficiently dry so that sediment is not discharged into streams.
    - All operations at a given site will be conducted in one day. If equipment breakdowns prevent completion of installation or removal in one day, work will be completed in the shortest period feasible.
    - When a 7-day National Weather Service forecast of rain includes a minimum of 5 consecutive days with any chance of precipitation, 3 consecutive days with a 30% or greater chance of precipitation, or 2 consecutive days of 50% or greater chance of precipitation, MCRCD/NRCS will finish work underway at encroachment and refrain from starting any new work at encroachment prior to the rain event.

Limitation on Earthmoving

- Disturbance to existing grades and vegetation will be limited to the actual site of the conservation project and necessary access routes.
- Placement of temporary access roads, staging areas, and other facilities will avoid or minimize disturbance to habitat as much as possible.
- Disturbance to native shrubs, woody perennials or tree removal on the streambank or in the stream channel will be avoided or minimized to the fullest extent possible.
- If trees over six inches dbh (diameter at breast height) are to be removed, they will be replaced by native species appropriate to the site at a 3:1 ratio, with the exception of large wood enhancement projects, under Practice # 3 *Stream Habitat Improvement and Management,* where a few individual trees may be recruited to provide needed cover/habitat following the protocols contained in that practice. Where physical constraints in the project area prevent replanting at a 3:1 ratio and canopy cover is sufficient for habitat needs, replanting may occur at a lesser replacement ratio.
- If shrubs and other non-woody riparian vegetation are disturbed, they will be replaced with similar native species appropriate to the site.
- Whenever feasible, finished grades will not exceed 1.5:1 side slopes. In circumstances where final grades cannot achieve 1.5:1 slope, additional erosion control or stabilization methods will be applied as appropriate for the project location.
- Excavated material not used during construction will be removed and placed outside of the 100-year floodplain.
- Spoils spread on site will be seeded and mulched or end-hauled for suitable disposal.
- Upon completion of grading, slope protection of all disturbed sites will be provided prior to November 1 through a combination of permanent vegetative treatment, mulching, geotextiles, and/or rock.
- Only native plant species will be used with the exception of non-invasive, non-persistent grass species used for short-term vegetative cover of exposed soils.
- Rock placed for slope protection will be the minimum necessary to avoid erosion, and will be part of a design that provides for native plant revegetation and minimizes bank armoring.

Implementation of these measures will ensure only minimal, short-term disturbance resulting in insignificant amounts of fine sediment deposition during construction.

Limitations on Construction Equipment

- MCRCD/NRCS will ensure that chemical contamination (fuel, grease, oil, hydraulic fluid, solvents, etc.) of water and soils is prohibited during routine equipment operation and maintenance.
- Heavy equipment will not be used in flowing water.
- When possible, existing ingress or egress points will be used or work will be performed from the top of the creek banks.
- Use of heavy equipment will be avoided in a channel bottom with rocky or cobbled substrate.
- If access to the work site requires heavy equipment to travel on a rocky or cobbled substrate, a rubber tire loader/backhoe is the preferred vehicle.
- Wood or rubber mats will be placed on the streambed prior to use by any other types of heavy equipment.
- The amount of time this equipment is stationed, working, or traveling within the creek bed will be minimized.
- When heavy equipment is used, any woody debris and stream bank or streambed vegetation disturbed will be replaced to a pre-project density with native species appropriate to the site. If trees over six inches dbh are to be removed, they will be replaced by native species appropriate to the site at a 3:1 ratio.
- The use or storage of petroleum-powered equipment will be accomplished in a manner that prevents the potential release of petroleum materials into waters of the state (Fish and Game Code 5650). To accomplish this, the following precautionary measures will be followed:
  - → Excavation and grading activities are scheduled for dry weather periods.
  - → A contained area is designated for equipment storage, short-term maintenance, and refueling. It is located at least 50 feet from waterbodies.
  - → Vehicles are inspected for leaks and repaired immediately.
  - → Leaks, drips and other spills are cleaned up immediately to avoid soil or groundwater contamination.
  - → Major vehicle maintenance and washing are done off site.
  - → All spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries are collected, stored, and recycled as hazardous waste off site.
  - → All construction debris is taken to appropriate landfills and all sediment disposed of in upland areas or off-site, beyond the 100-year floodplain.
  - → Dry cleanup methods (i.e. absorbent materials, cat litter, and/or rags) are used whenever possible. If necessary, only a minimal amount of water will be used to keep dust levels down.
  - → Spilled dry materials are swept up immediately.

Revegetation and Removal of Exotic Plants

- The project area will be restored to pre-construction condition or better.
- All exposed soil resulting from the project's construction activities will be revegetated using live planting, seed casting or hydroseeding.
- Any stream bank area left barren of vegetation as a result of the project will be stabilized following construction by seeding, replanting, or other agreed upon means with native trees, shrubs, and/or grasses appropriate to the site prior to November 1 in the year work was conducted.
- Soil exposed as a result of construction, soil above rock riprap, and interstitial spaces between rocks will be revegetated with native vegetation by live planting, seed casting, or hydroseeding prior to November 1 of the project year.
- The spread or introduction of exotic plant species will be avoided to the maximum extent possible by avoiding areas with established native vegetation during project activities, restoring disturbed areas with appropriate native species, and post-project monitoring and control of exotic species.
- Removal of invasive exotic species will be strongly recommended to the landowner/manager. Mechanical removal (hand tools, weed whacking, hand pulling) of exotics will be done in preparation for establishment of native perennial plantings.
- To the extent possible, revegetation will be implemented at the same time removal of exotic vegetation occurs.
- If *Arundo donax* (Giant reed) is removed, cuttings will be disposed of in a manner that will not allow reestablishment to occur.
- Native plants characteristic of the local habitat will be used for revegetation when implementing and maintaining projects in riparian and other sensitive areas. Non-invasive, non-persistent grass species (i.e. barley grass) may

be used for their temporary erosion control benefits to stabilize disturbed slopes and prevent exposure of disturbed soils to rainfall.

- Annual inspections for the purpose of assessing the survival and growth of revegetated areas and the presence of exposed soil will be conducted for two years following construction.
- The MCRCD/NRCS will note the presence of native/non-native vegetation and extent of exposed soil, and take photographs during each inspection.
- The MCRCD/NRCS will provide the location of each project, pre- and post-construction photos, diagram of all areas revegetated and the planting methods and plants used, and an assessment of the success of the revegetation program in the Mendocino County Permit Coordination Program annual report provided to the regulatory agencies each March.

Erosion Control

- Erosion control and sediment detention devices and materials will be incorporated into the project design and installed at the time of construction. Measures to protect water quality from storm events are addressed beginning on page 4, *Temporal Limitations on Construction.*
- Effective erosion control measures will be in-place at all times during construction. Construction within the 5-year flood plain will not begin until all temporary erosion controls (straw bales or silt fences that are effectively keyed-in) are in place down slope of project activities.
- Non-invasive, non-persistent grass species (i.e. barley grass) may be used for their temporary erosion control benefits to stabilize disturbed slopes and prevent exposure of disturbed soils to rainfall.
- Upon project completion, all exposed soil present in and around the project site will be stabilized within 7 days.
- Soils exposed by project operations will be seeded and mulched to prevent sediment runoff and transport.
- Most construction will occur above any flowing water. If this is not possible, measures will be taken to isolate the workspace from flowing water to prevent stream sedimentation and turbidity according to NMFS protocols and guidelines. See de-watering guidelines below.

Limitations on Use of Herbicides

- The use of herbicides, pesticides and chemical fertilizers to remove non-native invasive vegetation and hasten or improve the growth of critical area plantings will be avoided in the project area, unless non-chemical alternatives will not be effective in achieving project goals.
- In most circumstances, organic amendments will be used to ensure successful establishment of restoration vegetation.
- In situations where organic amendments will not guarantee adequate establishment of restoration vegetation, application rates for chemical fertilizers will be based on soil nutrient testing and will utilize slow release or split applications to minimize leaching or runoff into water bodies.
- Fertilizers may be used on stream banks above the normal high water mark the year of planting if necessary.
- Hand labor will be used to control exotic vegetation at the site. Herbicides may be applied to control established stands of invasive non-native species that are otherwise difficult to remove, such as Tamarisk, Giant Reed and Vinca.
- Where it is necessary to use herbicides to control established stands of exotics or to control the invasion of exotics into restoration plantings, herbicides will be applied according to registered label conditions and in a manner consistent with the U.S. EPA's Use Limitation Codes for aquatic animals.
- Where herbicides will be used within federal jurisdictional waters (below normal high-water mark), or within 25 feet of any watercourse or body, only formulations approved by agencies for aquatic use will be utilized.
- MCRCD/NRCS will ensure that projects which include the application of aquatic herbicides within federal jurisdictional waters are only conducted done in a manner consistent with the U.S. EPA National Pollutant Discharge Elimination System (NPDES) requirements. In California, projects that include direct point source discharges of aquatic herbicides to surface waters are regulated through waste discharge requirements administered through the State Water Resources Control Board, Regional Water Quality Control Boards, or Division of Water Quality, and must be permitted prior to implementation
- Hand or backpack spraying will be used in order to minimize overspray, and vehicular or aerial spraying conducted only for large-scale infestations of exotics where other methods would not be effective.
- Aquatic herbicide use is limited to July 1 through October 15 of each year, except near stream channels known to provide habitat for California Coastal Chinook salmon, where use will be limited to July 1 to August 15 to avoid impacts to upstream migrating Chinook salmon.

- Herbicides must be applied directly to plants and may not be spread upon any water or where they can leach into waterways in subsequent rains.

Environmental Protection Measures & Conditions for Specific Practices

Critical Area Planting, Channel Vegetation and Restoration and Management of Declining Habitats

The following measures will be employed:

- Plant materials used will be native to the site and will be locally collected if possible.
- Straw mulch will be applied at a rate of 2 tons per acre of exposed soils and will be secured to the ground using hand tools or by placement of jute matting.
- When implementing or maintaining a critical area planting above the high water line, a filter fabric fence, straw wattles, fiber rolls and/or hay bales will be utilized, if needed, to keep sediment from flowing into the adjacent water body.
- Planting above the ordinary high water line may occur at any time of the year.
- If needed, an irrigation system will be installed to ensure the successful establishment of vegetation.
- If the irrigation system relies on water from a stream or creek, the system may not reduce stream flow by more than 10 percent and will be screened to prevent entrainment of juvenile and adult fish. This practice will be conducted through a DFG Lake and Streambed Alteration Agreement.

Grade Stabilization Structure, Stream Habitat Improvement and Streambank Protection

In addition to the general limitations set forth in the previous section, the following measures will be employed for stream stabilization projects.

- Biotechnical approaches will be used for streambank protection. Only in unusual circumstances would non-biotechnical methods be used by MCRCD/NRCS. Incorporation of rock will be minimized and, if used at all, will need to be justified in order to secure regulatory approval for use under this program.
- No concrete, sackcrete, grouted rock or gabions will be installed.
- Construction and maintenance of any practice that results in a permanent change in flow in streams that support a fishery are not permitted under this program.
- Construction and maintenance of grade stabilization structures in streams or creeks that support a salmonid fishery will not be permitted under the Program.
- No chemically treated timbers will be used for channel stabilization structures, bulkheads or other instream structures.
- Sediment removal from the stream channel may be conducted if it will improve biological functioning of the stream and restore channel capacity.
- Sediment removal will not be conducted in a flowing stream or in standing water.
- When possible, existing ingress or egress points will be used and work will be performed from the top of the creek banks.
- When requested by CDFG or NMFS, the MCRCD/NRCS will inspect instream habitat and performance of sediment control devices at least once each day during construction to ensure that the devices are functioning properly.

Structure for Water Control and Stream Crossings

These practices will be used generally to replace or retrofit existing culverts and to install culverts where water control is needed at a stream crossing or road ditch to restore natural hydrology, and to reduce potential diversions and road-related erosion. In addition to the general limitations set forth in the previous section, the following measures will be employed for these types of projects :

- Culverts and water control structures will be installed according to guidelines established in the Handbook for Forest and Ranch Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Maintaining, and Closing Wildland Roads (Weaver and Hagans 1994) and any subsequent editions.
- Culvert fill slopes will be constructed at a 2:1 slope or will be armored with rock.
- All culverts replacements will be adequately sized to accommodate the 100-year storm.

- All culverts in fish-bearing streams and in streams where fish have historically been found and may potentially re-occur, will be designed and constructed consistent with NMFS Southwest Region's Guidelines for Salmonid Passage at Stream Crossings (NMFS 2000) and CDFG's Culvert Criteria for Fish Passage (CDFG 2002)
- No rocked fords will be placed in fish-bearing streams.

Access Roads

In addition to the general limitations set forth in the previous section, the following measures will be employed for road improvement projects.

- Road improvements will be modeled on the "Handbook for Forest and Ranch Roads: A Guide for Planning, Designing, Constructing, Reconstructing, Maintaining and Closing Wildland Roads," by William Weaver and Danny Hagans.

Additional Measures to Avoid/Minimize Direct Impacts on Anadromous Salmonids and their Habitat

- MCRCD/NRCS will meet with NMFS and CDFG staff in May/June of each year to review the annual group of projects. At that time, NMFS and CDFG will have the opportunity to modify or provide additional project conditions and measures.
- Any changes will be documented in a memo from the MCRCD or NRCS to the agencies, and will be included in the projects' plans.
- At the beginning of each construction season, a summary of proposed projects with details on construction techniques, stream conditions expected at the time of work, and proximity and connectivity to known sensitive habitat will be submitted to NMFS and CDFG by NRCS.
- Within 30 days of receipt of the annual summary of proposed projects, NMFS and CDFG will respond in writing that the projects are consistent with the goals and scope of the approved project, or will contact MCRCD or NRCS with any concerns.
- For work proposed in fish-bearing streams, a NMFS- or CDFG-approved individual will act as a biological monitor during construction. The individual will monitor construction activities, instream habitat, and the performance of sediment control devices/materials.
- The biological monitor will have the authority to halt work activity and recommend measures for avoiding adverse effects. Work activity will not recommence until the situation is resolved to the satisfaction of the biological monitor.
- If unforeseen circumstances arise during project implementation that may lead to the disturbance or harm of steelhead or salmon, operations will cease immediately and NMFS and CDFG will be contacted before work can continue. If the biological monitor determines that anadromous salmonids must be removed from the work site, or if an unanticipated event occurs that could impact individual fish, he/she will notify a NMFS- or CDFG-approved fisheries biologist.

Limitations on Work in Streams and Permanently Ponded Areas

- If it is necessary to conduct work in or near a live stream, the work space will be isolated to avoid construction activities in flowing water.
- Water will be directed around the work site as described in temporary stream diversion details shown below. In addition, if salmonids are present, fish will be relocated as described below.
- Where available, existing ingress/egress points will be utilized and work will be performed from the top of the bank to the maximum extent possible.
- Use of heavy equipment in a channel will be avoided when possible. If access to the work site requires the use of heavy equipment within the channel, the first choice will be to use a rubber tire loader/backhoe. Only after this option has been determined infeasible will the use of tracked vehicles be considered.
- The amount of time construction equipment is stationed, working or traveling within the creek bed will be minimized.
- If the substrate of a seasonal pond, creek, stream or water body is altered during work activities, it will be returned to approximate pre-construction conditions after the work is completed, unless MCRCD, NRCS and NMFS or CDFG determine other measures should be implemented.
- No gabions, grouted rock, concrete or sackcrete will be used in any waterway for grade stabilization or streambank protection.

- No chemically treated timbers will be used for channel stabilization structures, bulkheads, crib walls or other instream structures.
- All debris, sediment, rubbish, vegetation or other material removed from the channel banks or other location will be removed to a location where they will not re-enter any water course in the action area.
- All petroleum products, chemicals, silt, fine soils, and any substance or material deleterious to fish will not be allowed to pass into or be placed where it can enter any water course in the action area.

Temporary Stream Diversion and Dewatering: All Live Streams

- For construction in a flowing or pooled stream or creek reach, or where access to the stream bank from the channel bottom is necessary, the work area will be isolated with the use of temporary cofferdams upstream and downstream of the work site and all flowing water will be diverted around the work site throughout the construction period.
- Other approved water diversion structures will be utilized if installation of cofferdams is not feasible.
- Cofferdams will be constructed with the use of off-site river-run gravel and/or sand bags. The upstream end of the upstream cofferdam will also be reinforced with thick plastic sheeting to minimize leakage.
- The diversion pipe will consist of a large plastic HDPE or ADS pipe or similar material, of a sufficient diameter to safely accommodate expected flows at the site during the full construction period.
- The pipe will be protected from construction activities to ensure that bypass flows are not interrupted.
- Continuous flow downstream of the work site will be maintained at all times during construction.
- When construction is complete, the flow diversion structure will be removed in a manner that allows flow to resume with a minimum of disturbance to the substrate.

Temporary Stream Diversion and Dewatering: Fish-bearing Streams

- In fish bearing streams, a screened pump intake will be used to remove water from the construction site and will be piped downstream.
- Pumps will be screened in accordance with NMFS Southwest Region's Fish Screening Criteria for Anadromous Salmonids (January 1997) for mesh size (3/32-inch maximum), approach and sweeping velocities, and other specifications.
- A qualified fisheries biologist approved by NMFS will be on site during dewatering, stream diversion, and removal or decommissioning of the temporary diversion facilities, and as needed at other times to protect fish, other aquatic species and water quality during project construction activities.

Fish Capture and Relocation

- A qualified biologist approved by NMFS will capture fish in the work areas, and relocate them to suitable habitat outside the work areas according to NMFS protocols and guidelines.
- Immediately prior to the beginning of construction work, the biologist will determine if any fish are present in the project vicinity.
- An assessment of fish and amphibian presence will be made following protocols described in the CDFG California Salmonid Stream Habitat Restoration Manual (Flosi et al. 1998), and utilizing visual streambank and underwater observations, and seine net surveys.
- The entire project area will be assessed if necessary, including all pools, riffles and runs, as well as upstream and downstream of the site.
- If prior to construction, no fish are detected following the assessment, fish capture and relocation measures will not be implemented. However, a qualified biologist will survey the site periodically, and will be available on-call, during the construction process to ensure fish have not moved into the work area.
- If fish are observed after construction commences, work will be stopped immediately and appropriate fish protection measures taken.
- If fish relocation must occur, the methods will follow NMFS protocols for seining and electrofishing techniques.

Monitoring Report Requirements

Under the PCP, MCRCD/NRCS will provide written notification of the status of all projects to permitting and funding agencies in the form of an annual post-construction report due March 31 of each year after project completion for the required duration of monitoring. The report will list participating landowners and describe each project objective, area affected, natural biological enhancements, monitoring protocols conducted, and cut/fill volumes and slope of work. It

will discuss conservation benefits, quantify gains in wetlands and riparian areas, and provide photo documentation of before and current site conditions. Photo documentation will occur from photo points before construction and annually thereafter throughout the term of the monitoring program and will include both close-up and long-range shots. If requested, regulatory agencies will be provided the opportunity to review project outcomes with MCRCD/NRCS at any time during the monitoring period or as allowed through permits. Landowners will be given a minimum of 24-hour notification of regulatory agency site visits by MCRCD/NRCS staff. Outside of the monitoring/maintenance/permit period for implemented projects, regulatory agencies will have to seek permission to participate in project inspections by contacting landowners directly.

Initial Study

Project Description and Background

Project Title:	Mendocino County Permit Coordination Program
Lead Agency:	Mendocino County Resource Conservation District (MCRCD) 206 Mason Street, Suite F, Ukiah, CA 95482
Contact Person:	Patty Madigan (707) 462-3664
Project Location:	All Mendocino County watersheds, excluding the Coastal Zone, Point Arena mountain beaver habitat and tidewater goby habitat.
Project Sponsor:	Mendocino County Resource Conservation District 206 Mason Street, Suite F, Ukiah, CA 95482
General Plan Description:	Rural Community, Rural Residential, Remote Residential, Open Space, Forest Lands, Agricultural Lands, Rangelands, and Tribal Lands. Mendocino County General Plan reports 22.1% of the County is in Agricultural Preserve and 38% is in Timber Protection Zone.
Zoning:	RR, RC, URL, RL, FL, TP, TPZ, OS, AG

Description of Project

The purpose of the proposed Mendocino County Permit Coordination Program (PCP) is to provide a catalyst for implementation of high-quality projects to reduce erosion, improve water quality, and enhance aquatic and terrestrial habitat throughout the watersheds of Mendocino County by providing coordinated regulatory review. The program is based on a model of coordinated, multi-agency regulatory review that ensures the integrity of agency mandates but allows regulatory compliance to be more accessible to landowners than a more traditional process. It expands the successful Navarro River Watershed Permit Coordination Program countywide, from the Mattole River hydrologic sub-area in the north to the North Fork of the Gualala River watershed in the south, excluding the Coastal Zone under Coastal Commission jurisdiction, Point Arena mountain beaver habitat, and tidewater goby habitat.
To implement the proposed program, the Mendocino County Resource Conservation District (MCRCD) is requesting programmatic permits and approvals from regulatory agencies to cover projects constructed according to a set of 10 specific, standardized conservation practices outlined below that will improve habitat values and soil stability. Projects consistent with these 10 conservation practices are relatively small in size, have demonstrated a net environmental benefit, and are usually performed for erosion control or habitat restoration in and around waterways. They are designed to improve the natural resource values of sensitive habitats at and further downstream of the work areas. Working cooperatively with MCRCD and/or the U.S.D.A. Natural Resource Conservation Service (NRCS), landowners agree to follow the approved designs and specifications based on NRCS Technical Guides, which results in high-quality work and ensures follow up and monitoring on each conservation project.

Limitations on Project Size

To ensure minimal impacts, projects constructed under the PCP will be limited in size. The limitations on length, dimension, and volume in the table below are maximum figures set to minimize impacts without unduly restricting capabilities to restore habitat and improve water quality. An estimated maximum of 25 projects may be approved for implementation under the Program each year.

Additional Limitations on Dewatering and Coho Streams

Some practices may include dewatering of fish-bearing streams in order to install projects in a manner that protects water quality and individual fish during construction. Projects that have the potential to impact listed salmonids will be limited to 3-5 per year in each watershed, depending on watershed size and predicted work focus. Guidance for work in salmonid habitat has been provided by NOAA Fisheries Service (Biological Opinion, NMFS, July 27, 2010). To mitigate potential cumulative impacts of dewatering sites on fish-bearing streams, a minimum distance of 1,200 feet will be required to be maintained as undisturbed flow between project sites on the same stream in the same year. Where coho may be present, only 2 project sites will be allowed to be dewatered within a particular *watershed* and only if the projects are not located on the same tributary stream.

Table 1: Conservation Practices and Size Limitations

1. ACCESS ROADS #560 Length: 10 miles Dimension: 2.5 acres Volume of soil disturbed: 12,000 cy Length of channel dewatered: n/a	Improves existing travel routes for moving livestock, produce, and equipment. Improvements to existing roads will control runoff, prevent erosion, and maintain or improve water quality while providing access for property management. An example of this practice would include outsloping and constructing rolling dips on a road so that water is less erosive as it travels across and off the road. This practice is used only on existing roads.
2. CRITICAL AREA PLANTING #342 Length: 2,000 feet Dimension: 2.5 acres Volume of soil disturbed: 500 cy Length of channel dewatered: n/a	Planting native vegetation such as trees, shrubs, vines, grasses, or forbs on highly erodible or critically eroding areas. This practice is used to stabilize the soil, reduce damage from sediment and runoff to downstream areas, and improve wildlife habitat and visual resources. It is often associated with the planting and re-vegetation of upland sites that have been disturbed through natural or man-made causes. The practice is often used as a follow-up to road/landing removal and with gully stabilization.
3. STREAM HABITAT IMPROVEMENT & MANAGEMENT #395 Length: 2000 feet Dimension: 5.0 acres Volume of soil disturbed: 1000 cy Length of channel dewatered: 500 feet	Improving a stream channel to create new fish habitat or to enhance existing habitat. This practice is used to improve or enhance aquatic habitat for fish in degraded streams, channels, and ditches stream sections through the strategic placement of large woody material, whole trees, root wads, or natural rock that reduces the flow velocity through the area. Coarse-grained sediments settle, reducing the quantity of sediment delivered downstream. This practice may require the placement of rock, though the use of rock will be the minimum necessary to create improved habitat. Increased shading from native shrub and tree plantings may decrease water temperature during the warm season. The dissolved oxygen content may be increased, improving the stream's assimilative capacity. Techniques for these by providing shade, controlling sediment, and restoring pool and riffle stream characteristics. Pools and riffles are formed in degraded practices are found in California Department of Fish and Game's (CDFG) Salmonid Stream Habitat Restoration Manual (Flosi et al. 1998). Additional techniques not found in the CDFG manual that may also be used in the Program are: • Boulder J-vanes (for streambank protection and pool creation) • Log and boulder J-vanes • Introduction of Streamside Trees through Directional Felling • Woody debris modification/installation with heavy equipment • Tree and shrub establishment No structure will be installed that would impede or have the potential to impede fish passage such as cross-channel boulder weirs. No project will be conducted that has the potential to cause significant impacts to downstream infrastructure, property, or other resources. All stream habitat improvement and management projects must be reviewed and permitted by regulatory permitting agencies prior to implementation.

4. GRADE STABILIZATION STRUCTURE #410 Length: 300 feet Dimension: n/a Volume of soil disturbed: 30 cy per structure Length of channel dewatered: n/a	A structure built into a gully or waterway to control the grade and prevent headcutting in natural or artificial channels. This practice refers to rock, concrete, or non-chemically treated timber structures placed to slow water velocities above and below the structure, resulting in reduced streambank and streambed erosion. This will decrease the yield of sediment and sediment-attached substances and improve downstream water quality. Under the proposed program, this practice will not be undertaken in fish-bearing streams.
5. ROAD/TRAIL/LANDING CLOSURE & TREATMENT #654 Length: 2 miles Dimension: 1.5 acres Volume of soil disturbed: 4,000 cy Length of channel dewatered: 500’	This practice includes the removal by excavation of old logging and ranch/farm access roads and landing fills from stream channels. This practice applies to areas where roads, landings, and ramp fills were placed in drainage corridors causing channel erosion and/or have been sources of sediment for downstream waters as a result of active erosion of these fills. Because of the unique characteristics of each drainage, removal of road and ramp fills will be done in accordance with site specific characteristics, soils and appropriate critical area stabilization techniques necessary to re-establish native vegetation.
6.STREAMBANK PROTECTION #580 Length: 500 feet Dimension: 0.5 acres Volume of soil disturbed: 7,500 cy Length of channel dewatered: 500’	Installation of vegetation or other treatments to stabilize and protect streambanks or excavated channels against scour and erosion. The banks of streams and waterbodies are protected to reduce sediment loads causing downstream damage and pollution, to improve the stream for fish and wildlife habitat, and to protect adjacent land from erosion damage. This practice is intended to promote biotechnical approaches; hard structural solutions will be recommended only in unusual circumstances and will require justification in order to secure regulatory approval under the Program. Streambank protection measures involving riprap or other structural components used to prevent localized stream erosion, sediment transport, or movement will require conventional permitting and are not authorized in the Program. However, rock used as a component of a bio-engineered structure and used to facilitate natural stream processes with the purpose of achieving equilibrium between erosional and depositional processes in streams will be authorized under the Program. Techniques for this practice are found in CDFG’s Salmonid Stream Habitat Restoration Manual (Flosi et al. 1998). Examples of techniques that will be used include: • Bank sloping with re-vegetation • Brush mattresses • Willow baffles • Rock deflectors
7.STREAM CHANNEL BANK VEGETATION #322 Length: 2,000 feet Dimension: 2 acres Volume of soil disturbed: 1,500 cy Length of channel dewatered: n/a	This practice applies to the re-vegetation of open channel and stream corridors in order to stabilize eroding areas and improve fish and wildlife habitat. Establishing native plants such as willows on channel banks is an example. Materials such as large rock are not used in this practice, which differs from Critical Area Planting in that it improves the plant community within a stream channel and stream channel streambank. Critical Area Planting would be used for upper terraces and other upland locations outside of a stream channel. The Stream Channel Bank Vegetation practice results in permanent vegetation on streambanks and adjacent areas to reduce erosion and sedimentation and improved water quality, fish and wildlife habitat, and aesthetics.

8.STRUCTURE FOR WATER CONTROL #587 Length: 100 feet per structure Dimension (acres): n/a Volume of soil disturbed: 1,500 cy Length of channel dewatered: 300 feet	Placement of a structure, generally a culvert that conveys water and controls the direction or rate of flow. This practice will be used to replace culverts that are not functioning properly, likely to plug, or are barriers to fish passage. New culverts or bridges may also be installed on existing roads where there is no water control structure at a stream crossing or where ditch relief is needed to control erosion. All culverts and bridges in fish-bearing streams that are installed or repaired under the Mendocino County PCP will conform to NMFS and CDFG standards and criteria for anadromous fish passage. Structures such as rocked fords will not be installed in fish-bearing streams.
9. STREAM CROSSING #578 Length: 100 feet per structure Dimension (acres): n/a Volume of soil disturbed: 2,000 cy Length of channel dewatered: 300 feet	The Structure for Water Control practice (NRCS #587) is used for installation of ditch relief culverts and other structures that convey water across a road. Stream Crossing (NRCS #578) is used where an intermittent or perennial watercourse exists and a ford, bridge, or culvert crossing is needed. All culverts and bridges in fish-bearing streams that are installed or repaired under the Mendocino County PCP will conform to NMFS and CDFG standards and criteria for anadromous fish passage. Structures such as rocked fords will not be installed in fish-bearing streams.

10. RESTORATION & MANAGEMENT OF RARE OR DECLINING HABITATS #643 Length: 2000 feet Dimension: 3 acres Volume of soil disturbed: 500 cy Length of channel dewatered: n/a	This practice is used to restore declining native vegetation communities and associated wildlife habitat. Non-native plants may be removed to allow regeneration of the native plant community. Native trees, shrubs, and herbaceous species may be planted to improve diversity, restore aquatic habitats and conserve native plant communities. An example of a project done under this practice would include the removal of the invasive giant reed (*Arundo donax*) and the planting of native vegetation after successful removal. Agency-approved herbicides will be used only when necessary to achieve desired habitat conditions. Where it is necessary to use herbicides to control established stands of exotics or to control the invasion of exotics into restoration plantings, herbicides will be applied according to registered label conditions and in a manner consistent with the products labeling instructions and the U.S. • In most circumstances, organic amendments will be used to ensure successful establishment of restoration vegetation. • Use of herbicides, pesticides, and chemical fertilizer will be avoided in the project area, unless non-chemical alternatives will not be effective. • Application rates for chemical fertilizers will be based on soil nutrient testing and will utilize slow release or split applications to minimize leaching or runoff into water bodies. • Fertilizers may be used on stream banks above the normal high water mark the year of planting if necessary. • Herbicides may be applied to difficult to remove, established stands of invasive non-native species such as tamarisk, giant reed and vinca. • Herbicides will only be applied according to registered label conditions consistent with the U.S. EPA's Use Limitation Codes for aquatic animals. • Within federal jurisdictional waters (below normal high-water mark), or within 25 feet of any watercourse or body, only formulations approved by agencies for aquatic use will be used. • MCRCD/NRCS will ensure that application of aquatic herbicides within federal jurisdictional waters is consistent with the U.S. EPA National Pollutant Discharge Elimination System (NPDES) requirements. Any discharge of aquatic herbicides to surface waters is regulated through waste discharge requirements administered through the State Water Resources Control Board, Regional Water Quality Control Boards, or Division of Water Quality, and must be permitted prior to implementation • Hand or backpack spraying will be used to minimize overspray, and vehicular or aerial spraying conducted only for large-scale infestations of exotics where other methods would not be effective. • Aquatic herbicide use is limited to July 1 through October 15 of each year, except near habitat for California coastal Chinook salmon, where use will be limited to July 1 to August 15. • Herbicides must be applied directly to plants and may not be spread upon any water or where they can leach into waterways in subsequent rains.

Surrounding land uses and setting:	The land uses surrounding the potential project areas include agriculture, recreation, industrial and non-industrial timber management and rural subdivisions.
Other public agencies whose approval is required:	Other public agencies whose approval is required and may include the following permitting/approvals**:** California Department of Fish and Game - Streambed Alteration Agreement and CESA Consultation North Coast Regional Water Quality Control Board - Clean Water Act §401 Water Quality Certification or California Clean Water Act (Porter Cologne) Waste Discharge Requirements, Waivers of Waste Discharge Requirements, and TMDL Compliance determinations. U.S. Army Corps of Engineers - Clean Water Act §404 Permit U.S. Fish & Wildlife Service – Biological Opinion or Statement of No Adverse Impacts National Marine Fisheries Service – Biological Opinion or Statement of No Adverse Impacts

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project. Please see the checklist and discussion of potentially affected resources beginning on page 10 for additional information.

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

Determination

On the basis of this initial evaluation:

☐	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☒	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required

Signature:	**Date:**
Printed Name: Janet Olave, Executive Director	**For:** Mendocino County RCD

Checklist of Potentially Affected Resources

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

Aesthetics

Discussion:

The program area is located in places with high aesthetic value and numerous scenic vistas. The program will improve aesthetics by enhancing and restoring native California vegetation along riparian corridors and wetlands at project sites. Short-term impacts on the scenic vista and visual character of project sites that may occur during construction of conservation and restoration projects will be immediately mitigated by installation of native vegetation and grasses in disturbed areas. When completed, the restoration and conservation projects will result in improved area aesthetics.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Generally, implementation of specific practices will not be visible from areas with public access. However, some projects conducted under the program may be visible during construction. This will not comprise a major portion of the view and will promptly be restored as described above to better than pre-project conditions.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

The RCD and NRCS will avoid scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a designated state scenic highway.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒

The projects conducted under the 9 proposed practices all enhance visual character of working landscapes and natural areas.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

No structures, materials, or treatments implemented as a result of this program will increase glare or create additional sources of light in the surrounding areas.

Agriculture and Forest Resources

Discussion:

In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, as well as the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.
One goal of the program is to support agricultural sustainability. Projects are designed to preserve agricultural land so the program will likely help keep important farmland areas in agricultural use.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

In some cases, very small amounts of agricultural land, along the edge of stream channels are laid back and converted to riparian vegetation. This change will help to preserve remaining land that was otherwise subject to loss through erosion. In addition, grazing land along the edge of streams may be fenced to allow recovery of the riparian corridor. Program activities will not change the overall land use on a parcel.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

No practices are proposed that would have any impact on Williamson Act contracts. Projects implemented under the program will be compatible with existing zoning.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

Proposed practices will neither cause zoning changes to forest land nor conflict with existing zoning designations within the project footprint and surrounding landscapes.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

None of the activities associated with this program will result in a loss of forest land, and none will lead to forest conversions.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Where restoration projects call for stabilizing streambanks by laying back the bank and planting riparian vegetation, some small amounts of agricultural and grazing land may be lost. The individual rancher or farmer will have a choice about whether to implement these measures. Practices such as Critical Area Planting and Restoration and Management of Declining Habitats support sustainable agriculture by attracting beneficial pollinators and preventing erosion from surface water runoff that might limit production and damage agricultural infrastructure. Streambank Protection and Stream Channel Vegetation practices will promote sustainable agriculture by encouraging resilience of riparian areas to periodic, episodic storm events and prevent the potential loss of productive lands.

Air Quality

Discussion:

Mendocino County falls within the North Coast Air Basin, which includes Del Norte, Humboldt, and the northern section of Sonoma County. Mendocino is administered by the Mendocino County Air Quality Management District (MCAQMD). Air quality in Mendocino County is generally good. Two areas of concern are ozone and PM10. Ozone precursors are generated by burning fossil fuels and wood both in stationary sources and vehicles. The largest sources of PM10 in Mendocino County are unpaved road dust, residential fuel combustion, paved road dust, wildfires, and construction and demolition (MCAQMD 2005). Implementation of restoration practices will include revegetation with native species, which will improve air quality through sequestration of greenhouse gases; see further discussion in Greenhouse Gas Emissions section below.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

Projects conducted under this program will have no adverse effects on air quality plans or the implementation thereof.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒

The MCRCD and NRCS will not violate any air quality standards or contribute to any existing or projected air quality violations. There may, in fact, be beneficial effects on air quality as a result of increased vegetation and the reduction of invasive plants through practices such as Critical Area Planting and Restoration and Management of Declining Habitats, which have the potential to lower fire hazards by reducing exotic, invasive plant material such as *Arundo donax* (Giant reed).

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒

The project will produce small amounts of localized diesel fumes, similar to that produced by farm or forest operations, within a short work window between late June and October. Best management practices will be used to keep airborne dust to a minimum, and the small scale of the construction will keep emissions less than cumulatively significant. The MCRCD and NRCS estimate a maximum of 25 projects per year, and no more than 3 to 5 projects per subbasin where projects have the potential to affect salmonids.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

No substantial pollutants are anticipated to be generated by these small-scale projects conducted under the PCP program by NRCS and the RCD.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

No objectionable odors are anticipated to persist within project footprints or surrounding landscapes; most activities will be conducted far from population centers in remote rural settings,

Biological Resources

Discussion:

Implementation and maintenance of the conservation practices may result in minor temporary impacts on biological resources. Project activities that have potential to result in short-term impacts include soil excavation, grading, preparation of the ground for seeding and mulching, placement of fill, vegetation removal, herbicide application, and burial, trampling or crushing of vegetation from equipment and foot traffic. Limited mortality of individual plants or animals may occur after consultation with and approval by the appropriate regulatory agencies.

Avoidance measures will ensure that potential disturbances will result in less-than-significant impacts. All practices provide for improved aquatic, riparian, and/or upland habitat and decreased sedimentation in waterbodies to benefit fish, amphibians, reptiles, resident and migratory birds, and many other species. For example, the Stream Habitat Improvement and Management practice will result in an increased number of deep pools that aquatic animals, including the California red-legged frog and salmonids, require to survive the long, dry California summers. Practices enhancing riparian vegetation and development of habitat values, including Critical Area Planting, Fish Stream Improvement, Stream Channel Vegetation, and Streambank Protection, will provide shelter from predators and breeding, rearing, foraging, and basking sites for special-status species known to occur in the watersheds.

Control of erosion and polluted runoff will improve the quantity and quality of freshwater input into the creeks, streams, and ponds. Control of nonnative plant species will reduce exotics invasion and displacement of native flora. Net biological benefits from the maintenance of the conservation practices for species include high quality aquatic, riparian, and upland habitat values, reduced habitat fragmentation and increased connectivity, maintaining or increasing species populations, and buffering sensitive areas.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Mendocino County has 54 species of rare, threatened, or endangered animals, 111 species of special-status plants, and 13 sensitive habitat types. This diversity of imperiled species and communities is precious to maintain. While the Permit Coordination Program overall will benefit species and natural communities, impacts may occur during project implementation. Measures are included in the program to avoid these impacts.

General Measures to Protect Special-status Species

The following avoidance and mitigation measures are included in the program to avoid or minimize adverse effects on candidate, sensitive, and special-status species.

- Before any construction begins, a qualified biologist will conduct a training session for all construction crew personnel. The training will include a discussion of the sensitive biological resources within the project site and the potential presence of special-status species. This will include a discussion of special-status species' habitats, protection measures to ensure species are not impacted by project activities, project boundaries, and biological conditions outlined in the project permits.
- The project limits will be clearly marked on the final design drawings and work confined within those boundaries. Prior to construction, the site supervisor, project engineer, and qualified biologist will meet on site to agree upon and flag project boundaries in the riparian area.
- Temporary wildlife exclusionary fencing (e.g., silt fence, which is a piece of synthetic filter fabric [also called geotextile]) will be installed around work areas during construction. Openings will be restricted to areas of construction site access. This fencing will preclude animals from entering the work area and prevent construction debris and workers from entering adjacent aquatic habitats.
- If a special-status species enters the work area, the construction crew supervisor will contact the project biologist for further guidance. Special-status species will not be captured or handled by the supervisor or field crew unless directed by the project biologist and/or regulatory agency personnel.
- Proper erosion control and other water quality Best Management Practices (BMPs) will be implemented to avoid sedimentation and disturbance to aquatic habitats.
- Riparian canopy and shade will be protected and enhanced through reestablishment of native vegetation. For projects that include accelerated large wood recruitment actions, such as strategic felling of existing riparian trees for the exclusive purpose of improving salmon habitat complexity, special consideration will be made to avoid/minimize the amount of increasing sunlight on streams.
- All staging, maintenance, fueling, and storage of construction equipment will be conducted in a location and manner that will prevent potential runoff of petroleum products into adjacent aquatic habitats. Oil-absorbent and spill-containment materials will be on site at all times.
- All trash that may attract predators (e.g., food) will be properly stored and removed at the end of each construction day. Following construction, all trash and construction debris will be removed.
- To prevent harassment, injury, or mortality of sensitive species or their habitat, no pets will be permitted within the work area.
- Any work with the potential to affect listed salmonids will require consultation with NMFS and CDFG and will occur with the appropriate permits or other authorizations.

Special-status animals likely to occur in the PCP area are shown in Table 2 below.

Table 2. Special-status Animals with Potential to Occur in the Project Area

Species	Federal Listing Status	State Listing Status	DFG Status
See discussion of salmonids under *Measures to Avoid Impacts on Salmonids* below.			
California red-legged frog, *Rana draytonii*	Threatened	None	SSC
Lotis blue butterfly, *Plebejusidas lotis*	Threatened	Threatened	None
marbled murrelet, Brachyramphus marmoratus	Threatened	Endangered	FP
northern spotted owl, *Strix occidentalis caurina*	Threatened	None	*SSC*
bald eagle, *Haliaeetus leucocephalus*	Delisted	Endangered	FP
American peregrine falcon, *Falco peregrinusanatum*	Delisted	Delisted	FP

white-tailed kite, *Elanus leucurus*	None	None	FP	
American badger, *Taxidea taxus*	None	None	SSC	
foothill yellow-legged frog, *Rana boylii*	None	None	SSC	
grasshopper sparrow, *Ammodramus savannarum*	None	None	SSC	
Gualala roach, *Laviniasymmetricus parvipinnis*	None	None	SSC	
Humboldt marten*, Martes Americana humboldtensis*	None	None	SSC	
Navarro roach, *Laviniasymmetricus navarroensis*	None	None	SSC	
northern goshawk, *Accipiter gentilis*	None	None	SSC	
northern red-legged frog, *Rana aurora*	None	None	SSC	
Pacific tailed frog, *Ascaphus truei*	None	None	SSC	
pallid bat, *Antrozous pallidus*	None	None	SSC	
purple martin, *Progne subis*	None	None	SSC	
Sonoma tree vole, *Arborimus pomo*	None	None	SSC	
southern torrent salamander, *Rhyacrotrition variegatus*	None	None	SSC	
Townsend's big-eared bat, *Coryrhinus townsedii*	None	None	SSC	
tricolored blackbird, *Agelaius tricolor*	None	None	SSC	
western pond turtle, *Emys marmorata*	None	None	SSC	
western red bat, *Lasiurus blossevillii*	None	None	SSC	
yellow warbler, *Dendroica petechial brewsteri*	None	None	SSC	
yellow-breasted chat, *Icteria virens*	None	None	SSC	
Bell's sage sparrow, *Amphispiza belli belli*	None	None	WL	
Cooper's hawk, *Accipiter cooperii*	None	None	WL	
Osprey, *Pandion haliaetus*	None	None	WL	
sharp-shinned hawk, *Accipiter striatus*	None	None	WL	

DFG status codes: FP- Fully Protected; SSC- Species of Special Concern; WL-Watch List

The Pacific fisher and California wolverine once lived in Mendocino County but are likely extirpated from the project area. Coastal species such as tidewater goby will not be affected because the PCP does not operate in the Coastal Zone.

Measures to Avoid and Minimize Adverse Impacts on Listed Salmonids

Special-status salmonid species with potential to occur in the program area, include:

a) Central California Coast (CCC) Steelhead (*Oncorhynchus mykiss*) - Threatened

b) Northern California Steelhead (*Oncorhynchus mykiss*) - Threatened

c) Central California Coast (CCC) Coho Salmon *(Oncorhynchus kisutch)* - Endangered

d) Southern Oregon and California Coast (SONCC) Coho Salmon *(Oncorhynchus kisutch)* - Threatened

e) California Coastal Chinook Salmon *(Oncorhynchus tshawytscha)* - Threatened

General Conditions to Avoid or Minimize Adverse Impacts are included in the Biological Opinion (BO) developed for the Mendocino County PCP by NMFS and issued to NRCS on July 27, 2010; see Exhibit A. The BO concluded that the habitat conservation practices described herein are not likely to jeopardize the continued existence of the following: 1) threatened CCC steelhead; 2) threatened NC steelhead: 3) endangered CCC coho salmon; 4) threatened SONCC coho salmon; 5) threatened CC Chinook salmon; and 6) designated habitat for these species. Specific best management practices (BMPs) are described (Exhibit A: BO pp. 8-10), and size limitations and project conditions are set (BO pp. 7-8). Measures to minimize and avoid impacts are described (BO pp. 10-15) as well as environmental protection measures for specific conservation practices (BO pp. 15-17). The BO addresses additional measures to avoid impacts on anadromous salmonids and their habitat (BO pp. 17-18). The administrative record of this consultation is on file at the NMFS Santa Rosa Area Office.

MCRCD/NRCS will meet with NMFS and CDFG staff in May/June of each year to review upcoming projects. At that time, NMFS and CDFG will have the opportunity to modify or provide additional conditions and measures. After completion of project planning, a summary of proposed projects with details on construction techniques, stream conditions expected at the time of work, and proximity and connectivity to known sensitive habitat will be submitted to NMFS and CDFG. Within 30 days of receipt of the annual summary of proposed projects, NMFS and CDFG will respond in writing that the projects are consistent with the scope of the approved project or will contact MCRCD/NRCS with any concerns. Any changes will be documented in a memo from MCRCD to the agencies and will be included in the projects' plans.

If required, a site-specific dewatering and species protection plan will be prepared that will include developing a set of procedures and protective measures to follow during the dewatering process or while working within the wetted channel if water is present. The plan will be developed under guidance from CDFG and NMFS and implemented by a qualified biologist. Guidelines established in California Salmonid Stream Habitat Restoration Manual by CDFG (1998) and Juvenile Fish Screen Criteria for Pump Intakes by NMFS (1996) should be utilized.

For work proposed in fish-bearing streams, a NMFS- or CDFG-approved biological monitor will oversee construction activities, instream habitat, and the performance of sediment control devices/materials. The biological monitor will have the authority to halt work activity and recommend measures for avoiding adverse effects. Work will recommence only when the situation is resolved to the satisfaction of the biological monitor. If unforeseen circumstances arise that may lead to the disturbance or harm of steelhead or salmon, operations will cease immediately, and NMFS and CDFG will be contacted for guidance before work can continue. If the biological monitor determines that anadromous salmonids must be removed from the work site, he/she will notify the project's NMFS- or CDFG-approved fisheries biologist.

Specific Measures to Protect Special-status and Common Amphibians

- During potential yellow-legged frog breeding season from March to August, prior to disturbance to waterways, including vehicle crossing, a qualified biologist will examine the stream channel for potential egg masses and provide guidance on avoidance routes.
- If dewatering is deemed necessary, a dewatering and species protection plan will be prepared, which would include developing a set of procedures and protective measures to follow during the dewatering process. The plan will be developed under guidance from the California Department of Fish and Game (CDFG) and NOAA's National Marine Fisheries Service (NMFS) and implemented by a qualified biologist. Guidelines established in the California Salmonid Stream Habitat Restoration Manual by CDFG (1998) and Juvenile Fish Screen Criteria for Pump Intakes by NMFS (1996) will be utilized.

Measures to Avoid and Minimize Adverse Impacts on California red-legged frog (CRLF)

- At least 15 days prior to the onset of activities, MCRCD will submit the names(s) and credentials of biologists who would conduct activities specified in the following measures. No project activities will begin until MCRCD has received written approval from the Service that the biologist(s) is qualified to conduct the work.
- A Service-approved biologist will survey the work site at least two weeks before the onset of activities. If CRLF are found in the project area and these individuals are likely to be killed or injured by work activities, the Service-approved biologist will allow sufficient time to move them from the site before work activities resume. Only Service-approved biologists will participate in activities with the capture, handling, and monitoring of CRLF.
- Before any construction activities begin on a project, a Service-approved biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of CRLF and its habitat, the importance of CRLF and its habitat, the general measures that are being implemented to conserve CRLF as they relate to the project, and the boundaries within which the project may be

accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.

- A Service-approved biologist will be present at the work site until such time as removal of CRLF, instruction of workers, and habitat disturbance has been completed. The Service-approved biologist will have the authority to halt any action that might result in impacts that exceed the levels anticipated by the USACE and Service during review of the proposed action. If work is stopped, the USACE and the Service will be notified immediately by the Service-approved biologist or on-site biological monitor.
- During project activities, all trash that may attract predators will be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas.
- All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 65 feet from any riparian habitat or water body. MCRCD will ensure contamination of habitat does not occur during such operations. MCRCD will prepare a plan to allow a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.
- A Service-approved biologist will ensure that the spread or introduction of invasive exotic plant species is avoided to the maximum extent possible. Areas disturbed by project activities will be restored and planted with native plants.
- The number of access routes, number and size of staging areas, and the total area of the activity will be limited to the minimum necessary to achieve the project goal. Routes and boundaries will be clearly demarcated.
- Ground disturbing activities in potential CRLF habitat will be restricted to the period between July 1 and October 15.
- To control erosion during and after project implementation, MCRCD will implement BMPs, as identified by the appropriate Regional Water Quality Control Board.
- If a work site is to be temporarily dewatered by pumping, intakes will be completely screened with wire mesh not larger than 0.2 inch to prevent CRLF from entering the pump system. Water will be released or pumped downstream at an appropriate rate to maintain down stream flows during construction activities and reduce the creation of ponded water. Upon completion of construction activities, any barriers to flow will be removed in a manner that would allow flow to resume with the lease disturbance to the substrate.
- Ponded areas thus must also be monitored for CRLF that may become entrapped. Any entrapped CRLF must be relocated to a pre-determined receiving area.
- A Service-approved biologist will permanently remove from the project area, any individuals of exotic species, such as bullfrogs (*R. catesbiana*), centrarchid fishes, and non-native crayfish to the maximum extent possible. The biologist will have the responsibility to ensure that their activities are in compliance with the Fish and Game Code.
- Prior to the onset of any project-related activities, the approved biologist must identify appropriate areas to receive CRLF adults and tadpoles from the project areas. These areas must be in proximity to the capture site, contain suitable habitat, not be affected by project activities, and be free of exotic predatory species (i.e. bullfrogs, crayfish) to the best of the approved biologist's knowledge.
- If CRLF are found and these individuals are likely to be killed or injured by work activities, the Service-approved biologists must be allowed sufficient time to move them from the site before work activities resume. The Service-approved biologist must relocate CRLF the shortest distance possible to one of the predetermined areas. The Service-approved biologist must maintain detailed records of any individuals that are moved (e.g., size, coloration, any distinguishing features, photographs (digital preferred) to assist in determining whether trans-located animals are returning to the point of capture. Only CRLF that are at risk of injury or death by project activities may be moved.
- Biologists who handle CRLF must ensure that their activities do not transmit diseases. To ensure that diseases are not conveyed between work sites by the Service-approved biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force must be followed at all times.
- A monitoring plan will be developed to determine the level of incidental take of CRLF associated with the Project funded activities in the area. The monitoring plan must include a standardized mechanism to report any observations of dead or injured CRLF to the appropriate USACE and Service offices.

- MCRCD will report any observation of the incidental take of CRLF associated with the implementation of the Project. The Service and USACE must review the circumstances surrounding the incident to determine whether any patterns of repeated authorized or unauthorized activities are occurring that may indicate that additional protective measures are required. If, after completion of the review, the USACE and the Service agree that additional protective measures are required and can be implemented within the existing scope of the action, the USACE must require MCRCD to implement the agreed-upon measures within a reasonable time frame; if the corrective actions cannot be implemented with the scope of the existing action, the USACE and Service will determine whether re-initiation of consultation is appropriate.
- The USACE must immediately re-initiate formal consultation with the Service, pursuant to Section 7(a)(2) of the Endangered Species Act, if CRLF are taken within the action area at or in excess of the incidental take authorization.

Specific Measures to Protect Special-status Reptiles

- At sites with water elements such as streams, ponds, or lakes, a preconstruction survey for western pond turtles will occur prior to beginning work. This would include a focused survey for adult turtles and nest site searches. Any adults found within the work area will be relocated to suitable off-site habitat. Nest sites discovered during the preconstruction survey or anytime during construction will be avoided until vacated, as determined by a qualified biologist. On-going monitoring during construction will occur to ensure turtles have not moved back into the area and that they are not being impacted by activities.

Specific Measures to Protect Special-status and Common Birds

- If activities must occur during the normal breeding season, the work area will be surveyed by a qualified biologist prior to commencing. If active nests or behavior indicative of nesting are encountered, those areas plus a 50-foot buffer for small songbirds and 250-foot buffer for larger birds (e.g., owls, raptors) designated by the biologist will be avoided until the nests have been vacated.
- Ongoing construction monitoring will occur to ensure no nesting activity is disturbed. If the site is left unattended for more than one week, an additional survey will be completed.
- A preconstruction survey for special-status species, such as western pond turtles and foothill yellow-legged frogs, will occur prior to beginning work. This will include a focused survey for adults, egg masses, tadpole, and nest site searches. Any adults found within the work area will be relocated to suitable off-site habitat. Nest sites discovered during the preconstruction survey or anytime during construction will be avoided until vacated, as determined by a qualified biologist. On-going monitoring during construction will occur to ensure special-status species have not moved back into the area and that they are not being impacted by activities.
- Before any construction begins, a qualified biologist will conduct a training session for all construction crew personnel. The training will include a discussion of the sensitive biological resources within the project site and the potential presence of special-status species. This will include a discussion of special-status species' habitats, protection measures to ensure species are not impacted by project activities, project boundaries, and biological conditions outlined in the project permits.
- Prior to commencing work, including tree removal, a qualified biologist will survey the work area.
- If occupied roosting habitat is identified, removal of roost trees should not occur until it is unoccupied.
- If active bird nests or behavior indicative of nesting are encountered, those areas plus a 50-foot buffer for small songbirds and 250-foot buffer for larger birds (e.g., owls, raptors) designated by the biologist should be avoided until the nests have been vacated.
- If spotted owls are observed or suspected within close proximity to the project site, more focused surveys should be completed (see USFWS 2011b), and consultation with the CDFG and USFWS should occur to determine appropriate avoidance measures.
- If the site is left unattended for more than one week, an additional survey will be completed.
- Construction will be limited to daylight hours to avoid interference with the foraging abilities of bats and night-hunting birds.
- Temporary wildlife exclusionary fencing (e.g., silt fence, which is a piece of synthetic filter fabric [also called geotextile]) will be installed around work areas during construction. Openings will be restricted to

areas of construction site access. This fencing will preclude animals from entering the work area and prevent construction debris and workers from entering adjacent aquatic habitats.

- If a special-status species enters the work area, the construction crew supervisor will contact a qualified biologist and/or county staff for further guidance. Special-status species will not be captured or handled by the supervisor or field crew unless directed by a qualified biologist and/or resource agencies representative.

Measures to Avoid and Minimize Adverse Impacts on northern spotted owl (NSO)

- Noise from heavy equipment can disrupt breeding and lower breeding success in NSO. At sites within 0.25 miles of northern spotted owl habitat, construction activities will occur outside of the critical breeding period (February 1 to July 31).
- If activities must occur during the normal breeding season, work areas and a 0.25 mile buffer will be surveyed by a qualified biologist prior to commencing. If spotted owls are observed or suspected within close proximity to the project site, then that project will not be covered under the PCP.
- Projects which may cause disturbance within late-successional conifer forest will require surveys by a qualified biologist if work is planned within the critical breeding period. Where NSO activity centers that could be impacted are identified, the project will not be covered under the PCP.

Measures to Avoid Adverse Impacts on marbled murrelet (MM)

Project activities will not remove, degrade, or downgrade suitable marbled murrelet habitat. As a result, direct injury or mortality of murrelets is not likely. The potential exists for noise from heavy equipment work at these sites to disrupt marbled murrelet nesting. To avoid this potential impact, the following avoidance measures will be implemented:

- Restoration work will not be conducted within 0.25 mile of occupied or un-surveyed suitable marbled murrelet habitat between March 24 and September 15. The work window at individual work sites near suitable habitat may be modified, if protocol surveys determine that habitat quality is low and occupancy is very unlikely.
- If project actions proposed at a specific work site cannot be modified to prevent or avoid potential adverse effects on marbled murrelet or their habitat, then that project will not be covered under the PCP.

Specific Measures to Protect Special-status and Common Bats

- Prior to commencing work, including tree removal, building demolition, or retrofit, a qualified biologist will survey for bat roosts. If occupied roosting habitat is identified, removal of the roosting site will not occur until it is unoccupied.
- Prior to commencing work, all construction crew members will be trained by a qualified biologist on the status, life history characteristics, and avoidance measures for bats.
- If the site is left unattended for more than one week, an additional roosting survey will be completed.
- Construction will be limited to daylight hours to avoid interference with the foraging abilities of bats.

State and federally listed plants likely to occur in the PCP area are shown in Table 3 below.

Table 3. State and Federally Listed Plants with Potential to Occur in the Project Area

Species	Federal Listing Status	State Listing Status	Rare Plant Rank
Burke's Goldfields*, Lasthenia burkei*	Endangered	Endangered	1B.1
McDonald's rock-cress, *Arabis mcdonaldiana*	Endangered	Endangered	1B.1
Menzies' wallflower, *Erysimum menziesii* ssp. *menziesii*	Endangered	Endangered	1B.1
Monterey clover, *Trifolium trichocalyx*	Endangered	Endangered	1B.1

Howell's spineflower, *Chorizanthe howellii*	Endangered	Threatened	1B.2
Contra Costa goldfields, *Lasthenia conjugens*	Endangered	None	1B.1
Water howelia, *Howellia aquatilis*	Threatened	None	2.2
Kellogg's buckwheat, *Eriognum kelloggii*	Candidate	Endangered	1B.2
Red mountain stonecrop, *Sedum laxum ssp. eastwoodiae*	Candidate	None	1B.2
Humboldt milk-vetch, *Astragalus agnicidus*	None	Endangered	1B.1
Roderick's fritillary. *Fritillaria roderickii*	None	Endangered	1B.1
Red Mountain catchfly. *Silene campanulata* ssp. *Campanulata*	None	Endangered	4.2
Milo Baker's lupine. *Lupinus milo-bakeri*	None	Threatened	1B.1
North coast semaphore grass, *Pleuropogon hooverianus*	None	Threatened	1B.1
Baker's meadowfoam, *Limnanthes bakeri*	None	Rare	1B.1
Point Reyes blennosperma, *Blennosperma nanum*var*robustum*	None	Rare	1B.2
Leafy reed grass. C*alamagrostis foliosa*	None	Rare	4.2
Baker's navarettia, *Navarretia leucocephala* ssp. *Bakeri*	None	None	1B.1
Guggolz'sharmonia, *Harmonia guggolziorum*	None	None	1B.1
Raiche's manzanita, *Actostaphylos stanfordiana* ssp. *raichei*	None	None	1B.1
Rincon ridge ceanothus, *Ceanothus confusus*	None	None	1B.1
Santa Cruz clover, *Trifolium buckwestiorum*	None	None	1B.1
Whitney's farewell-to-spring, *Clarkia amoena* ssp. *whitneyi*	None	None	1B.1
Wolf's evening primrose, *Clarkia amoena* ssp. *whitneyi*	None	None	1B.1
Baker's goldfields, *Lasthenia californica* ssp. *bakeri*	None	None	1B.2
Beaked tracyina, *Tracyina rostrata*	None	None	1B.2
Blasdale's bent grass, *Agrostis blasdei*	None	None	1B.2
Bolander's horkelia, *Horkelia bolanderi*	None	None	1B.2
coast range bindweed, *Calystegia collina* ssp. *Tridactylosa*	None	None	1B.2
coastal triquetrella, *Triquetrella californica*	None	None	1B.2
Colusa layia, *Layiaseptentrionalis*	None	None	1B.2
dark-eyed gilia, *Gilia millefoliata*	None	None	1B.2

deceiving sedge, *Carex saliniformis*	None	None	1B.2
Franciscan onion, *Allium peninsulare* var. *franciscanum*	None	None	1B.2
glandular western flax, *Hesperolinium adenophyllum*	None	None	1B.2
Hall's bush-mallow, *Malcothamnus willii*	None	None	1B.2
Humboldt Bay owl's-clover, *Castilleja ambigua* ssp. *humboldtiensis*	None	None	1B.2
Jepson's milk-vetch, *Astralagus rattanii* var. *jepsoniansus*	None	None	1B.2
marsh checkerbloom, *Sidalcea oregano* ssp. *hydrophila*	None	None	1B.2
Marsh microseris, *Microserispaludosa*	None	None	1B.2
Mendocino Coast paintbrush, *Castilleja mendocinensis*	None	None	1B.2
Mendocino dodder, *Cuscuta pafica* var. *papillata*	None	None	1B.2
Mendocino gentian, Gentiana setigera	None	None	1B.2
minute pocket moss, *Fissidens pauperculus*	None	None	1B.2
North Coast phacelia, *Phacelia insularis* var. *continentus*	None	None	1B.2
Oregon fireweed, *Epilobium oreganum*	None	None	1B.2
Pacific gilia, *Gilia capitata* ssp. *pacifica*	None	None	1B.2
perennial goldfields, *Lasthenia californica ssp. macrantha*	None	None	1B.2
Point Reyes checkerbloom, *Sidalcea calycosa* spp. *rhizomata*	None	None	1B.2
Point Reyes horkelia, *Horkelia marinensis*	None	None	1B.2
purple-stemmed checkerbloom, *Sidalcea malviflora* ssp. *purpurea*	None	None	1B.2
pygmy cypress, *Hesperocyparis pygmaea*	None	None	1B.2
pygmy manzanita, *Arctostaphylos nummularia* ssp. *mendocinoensis*	None	None	1B.2
robust false lupine, *Thermopsis robusta*	None	None	1B.2
round-headed Chinese-houses, *Collinsia corymbosa*	None	None	1B.2
serpentinecryptantha, *Cryptantha dissita*	None	None	1B.2
short-leaved evax, *Hesperevax sparsiflora* var. *brevifolia*	None	None	1B.2
Siskiyou checkerbloom, *Sidalcea malviflora* ssp.	None	None	1B.2

patula			
Snow Mountain willowherb, *Epilobium nivium*	None	None	1B.2
Sonoma canescent manzanita, *Arctostaphylos canescens*ssp. *sonomensis*	None	None	1B.2
Stebbins' lewisia, *Lewisia stebbinsii*	None	None	1B.2
supple daisy, *Erigeron supplex*	None	None	1B.2
swamp harebell, *Campanula californica*	None	None	1B.2
thin-lobed horkelia, *Horkelia tenuiloba*	None	None	1B.2
white seaside tarplant, *Hemizonia congesta* ssp. *congesta*	None	None	1B.2
white-flowered rein orchid, *Piperia candida*	None	None	1B.2
Anthony Peak lupine, *Lupinus antoninus*	None	None	1B.3
deep-scarred cryptantha, *Cryptantha excavate*	None	None	1B.3
Koch's cord moss, *Entosthodon kochii*	None	None	1B.3
scabrid alpine tarplant, *Anisocarpus scabridus*	None	None	1B.3
bristly sedge, *Carex comosa*	None	None	2.1
northernmicroseris, *Microseris borealis*	None	None	2.1
Thurber's reed grass, *Calamagrostis crassiglumis*	None	None	2.1
alpine marsh violet, *Viola palustris*	None	None	2.2
coast fawn lily, *Erythronium revolutum*	None	None	2.2
cylindricaltrichodon, *Trichodon cylindricus*	None	None	2.2
dwarf alkali grass, *Puccinellia pumila*	None	None	2.2
giant fawn lily, *Erythronium oregonum*	None	None	2.2
grass Alisma, *Alisma gramineum*	None	None	2.2
great burnet, *Sanguisorba officinalis*	None	None	2.2
hair-leaved rush, *Juncus supiniformis*	None	None	2.2
lagoon sedge, *Carex lenticularis* var. *limnophila*	None	None	2.2
Lyngbye's sedge, *Carex lyngbyei*	None	None	2.2
marsh pea, *Lathyrus palustris*	None	None	2.2
Norris' beard moss, *Didymodon norrisii*	None	None	2.2
northern adder's-tongue, *Ophioglossum pusillum*	None	None	2.2
Nuttall's ribbon-leaved pondweed, *Potamogeton epihydrus*	None	None	2.2
Oregon coast paintbrush, *Castilleja affinis* ssp.	None	None	2.2

litoralis			
Oregon goldthread, *Coptis laciniata*	None	None	2.2
rattlesnake fern, *Botrychium virginianum*	None	None	2.2
seacoast ragwort, *Packera bolanderi* var. *bolanderi*	None	None	2.2
white beaked-rush, *Rhynchospora alba*	None	None	2.2
American manna grass, *Glyceria grandis*	None	None	2.3
California sedge, *Carex californica*	None	None	2.3
green yellow sedge, *Carexviridula* var. *viridula*	None	None	2.3
oval-leaved viburnum, *Viburnum ellipticum*	None	None	2.3
smallgroundcone, *Kopsiopsis hookeri*	None	None	2.3
Watershield, *Brasnia schreberi*	None	None	2.3

Rare plant ranks are generated by the California Native Plant Society and supported by the California Department of Fish and Game. Rank 1A - presumed extinct in California; 1B - rare, threatened, and endangered in California and elsewhere; 2 - rare, threatened, and endangered in California but more common elsewhere; 3 - a review list; 4 - limited distribution – watch list.

Specific Measures to Protect Special-status Plants

- All sites will be assessed by a qualified biologist prior to project implementation. If any special-status plant species are identified at a work site, one or more of the following protective measures will be used:
    - Fencing to prevent accidental disturbance of rare plants during construction,
    - On-site monitoring by a qualified biologist during construction to assure that rare plants are not disturbed, or
    - Redesign of proposed work to avoid disturbance of rare plants.
- If it becomes impossible to implement the project at a work site without potentially significant impacts to rare plants, then activity at that work site will not be conducted as part of the PCP.
- MCRCD will ensure that designers, engineers, and contractors working at PCP sites are aware of these conditions.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☒	☐	☐

Restoration of riparian habitats is a central goal of the Mendocino County PCP. Practices that will enhance riparian areas include: Critical Area Planting, Stream Habitat Improvement & Management, Streambank Protection, Stream Channel Vegetation, and Restoration & Management of Declining Habitats. Specific measures to ensure protection of riparian and sensitive ecological areas include temporal limitations on construction, limitations on earthmoving, limitations on construction equipment, revegetation and removal of exotic plants, erosion control, limitations on work in streams and ponded areas, and limitations on use of herbicides (Appendix A: NMFS BO, pp. 10-15).

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not	☐	☐	☒	☐

limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
No adverse effects on wetlands will result from this program. MCRCD and NRCS will practice avoidance of wetlands habitats.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
MCRCD and NRCS will abide by the terms and conditions of the NMFS Biological Opinion, Section 7 Consultation, the §404 Army Corps Regional General Permit (under development), §401 Waste Discharge Permit issued by NCRWQCB, CDFG §1600 Streambed Alteration Agreements, and USFWS's informal Section 7 consultation. The goal of the program is to improve habitat for fish and wildlife species; however, measures to minimize and avoid impacts are described in the NMFS Biological Opinion, pages 10-18 (Appendix A). MCRCD staff will work closely with NRCS to conduct reptile and amphibian surveys, and identify or monitor California red-legged frog habitat within their identified range. If fish relocation is an identified need, MCRCD staff will work with NMFS and/or CDFG staff to safely relocate any aquatic species within the worksite following approved protocols and permits.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
Mendocino County does not have a tree ordinance. The project will comply with Fish and Game policies to protect sensitive species and with the guidance from state and federal regulators. MCRCD and NRCS will coordinate closely with landowners and conservation easement holders (Land Trusts, CDFG, etc.) to ensure that no ordinances or easement protection measures are compromised as a result of projects conducted under the PCP.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
Mendocino County has two habitat conservation plans located in Point Arena and Manchester, both near the coast. The County also has one natural community conservation plan (NCCP) as a project of the Mendocino Redwood Company and applicable only on their land. Project activities using practices for erosion control and habitat restoration, implemented with protections for sensitive biological resources, will not conflict with these plans. The program provides support to both Redwood Valley Specific Plan and Mendocino County General Plan measures to protect natural resources and wildlife species. The proposed program would not conflict with any regional, state, or local habitat conservation plan.				

Cultural Resources

Discussion:

MCRCD and NRCS ensure that the effects of conservation activities on historic properties are considered in the earliest planning stages and that cultural resource protection is accomplished as efficiently as possible. As with all conservation projects, including those covered by the PCP, MCRCD and NRCS identify, examine, and avoid potential impacts on cultural resources. All projects implemented under this program operate under 36 CFR 800.

Cultural resource evaluations will occur in several steps. Initial project screening will include literature review for recorded archaeological resources to determine if impacts can be avoided during implementation. If warranted, an on-site evaluation by a qualified professional will occur. Potential impacts on Native American resources will be evaluated in cooperation with the appropriate tribal entities, and site visits will occur, as requested. If any potential historic resources, such as legacy railroad trestles, bridges, residences or outbuildings, are within the project footprint,

MCRCD or NRCS will notify the Mendocino County Planning and Building Department and applicable coastal or

inland historical associations. If the structures or sites are deemed to be historic or protected, guidance on protection measures will be sought and followed. In such cases, avoidance will be practiced wherever possible.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒

Historical resources in the project area will be avoided during project implementation.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

b) &c): No work will occur within known areas of paleontological, archeological, or other unique geological feature or resource. As stated above, any conservation or restoration activities that would cause an adverse impact on cultural resources will not qualify for the Mendocino County PCP.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

No work will occur in areas of known human remains. In the event of inadvertent discovery, all work will stop in the immediate vicinity of the discovered remains. The County Coroner and a qualified archaeologist will be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission will be contacted by the Coroner so that a "Most Likely Descendant" can be designated. Work will cease until the "Most Likely Descendant" has time to propose a mutually acceptable disposition for the remains to the landowner.

Geology and Soils

Discussion:

Six potentially active faults traverse Mendocino County, including the San Andreas, Mayacama, Whale Gulch, Round Valley, Etsel Ridge, and Pacific Star faults. The risk of slope failure, liquefaction, or structural failure is addressed during the planning process. NRCS produces the Eastern and Western Soil Survey of Mendocino County and specializes in soil science interpretations. NRCS engineers consider soil physical factors when selecting and designing conservation measures. The planning process and policies of the MCRCD and NRCS require all projects to be evaluated for soil hazards and mitigated if appropriate.
Bridge installations will be reviewed by either a professional engineer and/or a professional licensed geologist. Conservation practices covered by this program have been determined by the MCRCD and NRCS to have a net environmental benefit observable in the first year after construction. Thus, any contributions of sediments from construction are offset within the first year by the functioning of the conservation practice.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	☐	☐	☐	☒

ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒

a) i), ii), iii), & iv) The Critical Planting Area and Streambank Protection practices will tend to stabilize the earth against minor movement by increasing the depth and density of major root systems but will likely have no effect on major slides or slides in motion because of a strong earthquake.
Best management practices will be utilized during construction to prevent soil loss and polluted runoff. For example, when implementing or maintaining a critical area planting above the high water line, a filter fabric fence, fiber rolls, and/or hay bales will be utilized, if needed, to keep sediment from flowing into the adjacent waterbody. Annual review by MCRCD and/or NRCS will occur until the critical area planting is established to control erosion.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Projects to be implemented under the permit coordination program have the stated purpose of reducing or eliminating soil erosion. The conservation projects are designed to minimize impacts during construction. Best management practices will be utilized during construction to prevent soil loss and polluted runoff. For example, when implementing or maintaining a critical area planting above the high water line, a filter fabric fence, fiber rolls, and/or straw bales will be utilized, if needed, to keep sediment from flowing into the adjacent waterbody.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Soil stability is addressed as described above ensure that practices will be stable where implemented. None of the practices in the program includes elements that would destabilize landslides or cause other soil hazards.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐

Some projects may be located on expansive soil since it does occur within the project area; however, no structures that rely on soil stability will be used in these areas. Practices in areas with expansive soils will be limited to planting and other actions compatible with the site. No projects will create risks to life or property.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

The question is not applicable as sewers or septic systems are not involved in the program.

Greenhouse Gas Emissions

Discussion:

The program will generate small levels of greenhouse gas emissions from construction equipment. It is anticipated that the PCP will include an average of 12-25 projects per year. Implementation of each project may take 1 to 6 weeks, depending on the practices to be installed.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒

The program will generate greenhouse gases from construction activities and will sequester carbon from growth of woody species used in habitat enhancement and revegetation with practices such as Critical Area Planting, Streambank Protection, and Stream Channel Bank Vegetation. An estimated maximum of 25 projects may be approved for implementation under the Program each year. Many projects may involve the use of more than one practice, for instance, stream habitat might be combined with grade stabilization. Conservation practices constructed under the proposed program will be limited in size. The limitations on length, dimension and volume are maximum figures set to minimize impacts on salmonids without unduly restricting capabilities to restore habitat and improve water quality; however, these limits will define the maximum amount of greenhouse gases generated and/or sequestered.

Not all the projects implemented under the PCP are additional projects. The MCRCD has been implementing projects to improve agricultural sustainability and improve habitat for many years. The purpose of the PCP is to expedite the process so that projects can be completed more efficiently. It is reasonable to presume that the PCP will cause two kinds of changes in MCRCD projects. First, easier project permitting is likely to result in a larger number of projects being implemented. Second, projects are likely to be developed or amended to fit within program guidelines whenever possible, thus shifting the form of projects undertaken. The change in emissions from enacting the PCP is a result of both the change in number of projects and the change in project methods that will result from the program. Since it is difficult to quantify or assess the choices staff may make in response to changed circumstances, and therefore how many RCD projects will be conducted under the PCP versus separately. These calculations just treat the program as one complete action assessed against itself rather than baseline conditions.

To quantify potential project emissions and sequestration potential, projects were divided into two kinds: largely mass grading and largely fine grading. Cubic yards of materials potentially moved were used to calculate construction equipment hours to generate the expected emissions, based on the different time requirements for rough and fine grading. Potential area was used to calculate the amount of carbon the project sites will likely sequester per year. The program involves 10 specific restoration practices:

- Rough grading:
  - Access roads: maximum volume of soil disturbed: 12,000 cy.
  - Road, trail, and landing: volume of soil disturbed: 4,000 cy.
  - Streambank protection: maximum volume of soil disturbed: 7,500 cy.
- Fine grading:
  - Critical area planting: maximum volume of soil disturbed: 500 cy, maximum area: 2.5 acres.
  - Grade stabilization: maximum volume of soil disturbed: 30 cy.
  - Stream habitat restoration: maximum volume of soil disturbed: 1,000 cy, maximum area: 1 acres.
  - Stream channel bank revegetation: maximum volume of soil disturbed: 1,500 cy, maximum area: 2 acres.
  - Structure for water control: maximum volume of soil disturbed: 1,500 cy.
  - Stream crossing: maximum volume of soil disturbed: 2,000 cy.
  - Restoration and management of rare and declining habitats: maximum volume of soil disturbed: 500 cy, maximum area: 3 acres.

Assuming that MCRCD implements the maximum possible projects, each project uses 1-3 practices, and projects area evenly distributed among the practices, this could result in greenhouse gas emissions of approximately 83 MT CO_2E/year. Plantings would sequester about 730 MT/year on an ongoing basis although the amount will be less for the first few years in which plants area establishing. Each year's projects will add to the amount sequestered annually. This means that in year 10, projects from the first 10 years would be adding 730 MT CO_2E each (except the most recent years) for cumulative sequestration of 6000-7000 MT CO_2E/ year.

These estimates are very approximate and do not take into account the particular kinds of trees that will be planted or the exact specifications or numbers of future projects. However, the estimate has been made very conservatively and the amount sequestered is substantially larger over time than the amount produced. Even in the first year, when the project is implemented, it is likely that sequestration will be larger than emissions.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Greenhouse gas plans and policies in effect in the program area are generated by the State of California, the County of Mendocino, and the Mendocino Council of Governments. Transportation planning in the project area is the responsibility of the Mendocino Council of Governments. They are in the middle of revising the Regional Transportation Plan to provide for greenhouse gas emission reductions. One of the measures the draft plan has is concentrating development for improved use of public transit. Improved agricultural sustainability is consistent with this goal because working ranches do not become subdivisions. Likewise, the Mendocino County General Plan Policy RM-50 calls for protection of timberlands to prevent development that would exclude timber uses, so improved sustainability of these lands is consistent with the general plan.

Hazards and Hazardous Materials

Discussion:

None of these projects involve hazardous materials, except those commonly used in vehicular operation and the limited use of agency-approved herbicides. Precautionary measures for petroleum-based products are described, below.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒

a) &b) None of the sites involves use of hazardous materials except the common ones used in all vehicle operation and limited use of herbicides to control invasive plants. Use and storage of construction equipment at the site will occur during implementation of the practices. The NRCS and MCRCD will ensure that contamination of habitat does not occur during routine equipment operation. The use or storage of petroleum-powered equipment will be accomplished in a manner that prevents the potential release of petroleum materials into waters of the State (Fish and Game Code §5650). To accomplish this, the following precautionary measures will be followed:

- NRCS/MCRCD will schedule excavation and grading activities for dry weather periods.
- A contained area will be designated for equipment storage, short-term maintenance, and refueling. It will be located at least 50 feet from waterbodies.
- Vehicles will be inspected for leaks and repaired immediately.
- Leaks, drips and other spills will be cleaned up immediately to avoid soil or groundwater contamination.
- Major vehicle maintenance and washing will be done off site.
- All spent fluids including motor oil, radiator coolant, or other fluids and used vehicle batteries will be collected, stored, and recycled as hazardous waste off site.
- All construction debris will be taken to appropriate landfills and all sediment disposed of in upland areas or off-site, beyond the 100-year floodplain.
- Dry cleanup methods (i.e. absorbent materials, cat litter, and/or rags) will be used whenever possible. If necessary, only a minimal amount of water will be used to keep dust levels down.
- Spilled dry materials will be swept up immediately.
- Heavy equipment will not be used in flowing or standing water. The amount of time this equipment is stationed,

working, or traveling within the creek bed will be minimized.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
The program does not include the use of any acutely hazardous materials.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
No identified hazardous material sites will be within the project area of any program activities.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
e) &f) Mendocino County has several small publicly available or private airports; however, the PCP does not include airport projects. Although projects may occur in the larger vicinity of a private airstrip, no aspects of the project will impact air travel or air safety. Project activities will not occur where there would be any conflict of use.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
g) &h) The program does not include actions that could limit emergency response or alter fire hazards.				

Hydrology and Water Quality

Discussion:

The conservation practices selected for this permit coordination program are specifically designed to stem and resolve erosion and sediment problems, to minimize polluted runoff from agriculture, including nutrients, fertilizers, and pesticides/herbicides, and to be installed in such a manner that there is low to no risk of causing environmental impacts. Best management practices and erosion control measures are utilized both during construction and in the permanent erosion control measures to avoid adverse impacts on adjacent watercourses, hydrology, and water quality.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐

The conservation practices included in the program will adhere to water quality standards and the programmatic federal Clean Water Act §401 Conditions or Waste Discharge Requirements.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒

The Mendocino County Permit Coordination Program will not result in depletion of groundwater. Some conservation and restoration activities (such as installation of grade stabilization structures, in-stream restoration work, restoration work relating to road stream crossings, and water control structures) may result in minor, short-term changes in the course and direction of surface water movement during construction. However, these changes would last only the length of a temporary dewatering structure and should have no adverse effect on groundwater recharge.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐

Several practices in the program (access roads, critical area planting, grade stabilization structure, structure for water control) are designed to reduce erosion and silt-laden runoff. The grade stabilization structure practice involves reduction of stream velocity above and below the structure on a temporary basis to control grade. Improvements to existing farm and ranch roads through the access roads practice will redirect runoff from roads into safer outlets using waterbars and/or outsloping. Any potential short-term impacts resulting from construction disturbance will be avoided by use of construction best management practices and temporal limits on construction.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐

Rainfall and irrigation runoff and downstream flooding will be reduced as a result of implementation and maintenance of the conservation practices, which are designed to reduce runoff to the natural background level that would have occurred on the property prior to development of agricultural operations or impervious surfaces.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
Water that already exits to roadside ditches from properties where projects are implemented may continue, but the projects will not increase the amount of runoff or decrease water quality as described in Sections a), c), and d) above.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
One of the stated purposes of the program is improvement in water quality. No project will be implemented that will result in long-term degradation. Measures to protect water quality are included in the NMFS BO Measures to Minimize and Avoid Impacts beginning on p. 10l.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
No housing construction is authorized as part of this program.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐
The program will place vegetative or rock structures designed to stabilize erosion in 100-year flood hazard areas. Most of these structures run parallel to watercourses and, therefore, do not pose a risk for redirecting flows away from the flood hazard area. In addition, structures for water control, such as culverts, may be placed as part of the program. These structures will replace existing structures and will usually be larger, allowing more passage of flood flows. Sediment control basins may also be placed within the 100-year floodplain, although they will not be on the mainstem of creeks.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
The conservation and restoration projects of the Mendocino County Permit Coordination Program do not pose a threat of causing inundation by seiche, tsunami, or mudflow, or being inundated.				
Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
j) Inundation by seiche, tsunami, or mudflow	☐	☐	☒	☐
Failure of structures included in the permit coordination program poses little to no risk to life and property due to their small size and placement in rural agricultural areas. No significant amounts of water will be impounded.				

Land Use and Planning

Discussion:

The program will not alter existing land uses. However, it is anticipated that installation of the conservation and restoration practices will result in increased agricultural sustainability. Further, water quality improvements are expected to benefit recreation, commercial shellfish production, and commercial and recreational fishing. Mendocino County has 2 habitat conservation plans located in Point Arena and Manchester. Mendocino County has one natural community conservation plan as a project of the Mendocino Redwood Company and applicable only on their land. Project activities using practices for erosion control and habitat restoration, implemented with protections for sensitive biological resources, will not conflict with these plans. The program provides support to both Redwood Valley Specific Plan and Mendocino County General Plan measures to protect natural resources and wildlife species.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a), b), & c) Not applicable to this project.

Mineral Resources

Discussion:

No program activities will disturb or lead to the loss of mineral resources specified or delineated in the Mendocino County General Plan. The only commercial mining operations within the county, sand and gravel suppliers, operate according to and are accountable to their own specific permit and licensing limitations. The Mendocino County Permit Coordination Program will use both commercial and locally sourced rock typically used for restoration purposes—following the restrictions set forth by applicable authorities. This rock does not contain any important mineral resources.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) &b) Not applicable to this program. Nothing in the program will alter the availability of mineral resources.

Noise

Discussion:

The Mendocino County Permit Coordination Program will not directly or indirectly increase ambient noise, ground borne noise or vibrations beyond normal farm, ranch or forest operations—nor interfere with or exacerbate noise levels within the impact zone of any existing public or private airports in the county.

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
a), b), c), & d) Temporary ambient noise levels in the project vicinity will not exceed existing noise generated by common agricultural management. Many ranchers currently use earthmoving equipment to retrieve eroded soil, smooth eroded landscape features, and conduct routine agricultural cultivation.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
e) &f) Mendocino County has several public and private airports. No program activities are anticipated to have any impact to residents of these areas, and project activities will be conducted outside of the projected sound contours as shown in the Mendocino General Plan. Public use airports include: Ukiah Municipal, Willits Municipal, Round Valley, Little River, Boonville, and Ocean Ridge (Gualala); private use airports include: Fort Bragg Airfield, Lofty Redwoods, and Wilson's Field.				

Population and Housing

Discussion:

The Mendocino County Permit Coordination Program will not directly or indirectly induce population growth, displace any existing housing, or displace people. The project sites will be located in rural, forest and agricultural areas and will not alter existing land uses.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
a), b) & c) Not applicable to this project.				

Public Services

Discussion:

The Mendocino County Permit Coordination Program will neither require any additional public services nor any new governmental facilities.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Not applicable to this project.

Recreation

Discussion:

Projects conducted under this program are not specifically designed to enhance recreation or access for recreation. Typically, there are limited recreational land use activities at potential restoration sites addressed by NRCS and MCRCD in Mendocino County, including mountain biking and horseback riding; off-road ATV use is mostly for property management purposes. Restoration of trails and roads may enhance passive recreational activities such as hiking, birding, and botanical and mushroom walks. Improvements to water quality will enhance water sports, including boating, fishing and swimming. Hunting is a common seasonal activity controlled, by landowners and property managers, to prevent erosion and damage to roads. Access is almost always controlled by locked gates.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

The Mendocino County Permit Coordination Program will not increase the use of any recreational facility.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Where improvements in recreational facilities support program goals of improved water quality and wildlife habitat, such improvements may be conducted as part of the program. Actions under the program might include rerouting a trail to avoid a listed plant or changing a wetcrossing to a bridge to keep livestock and humans out of sensitive habitat. These changes will improve the way recreation happens but will not increase recreational facility capacity or use, so no adverse environmental impacts are anticipated except the temporary construction impacts addressed elsewhere.

Transportation/Traffic

Discussion:

Additional traffic associated with project construction is likely; however, the increase will be minor, temporary, and not exceed the capacity of the road system. The proposed conservation activities will reduce or eliminate many threats to traffic safety, such as sediment on roads, plugging of road culverts, and associated localized flooding. By reducing the likelihood of these traffic hazards, there will be less need for county public works crews and equipment to be on the roads to clean up sediment and flooding problems. Should work occur on a state highway, a road encroachment permit would be obtained from Caltrans.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒

When complete, the project will not impact traffic at all aside from the beneficial effects described above. During construction, there may be some additional traffic from construction worker commutes and construction trucks. However, these small-scale construction projects do not employ enough workers or generate enough truck traffic to change the existing traffic load in a noticeable way.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒

Projects are located off main roads with good access from the existing ranch roads. Occasionally, work may occur within sight of a public road, and curious drivers could then cause traffic slow-downs. Usually, roads in rural Mendocino County, within the permit coordination area, are completely free flowing.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒

This project will not use or influence air traffic.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

This project will not change road structure or use patterns.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Result in inadequate emergency access?	☐	☐	☐	☒

This project will not affect emergency access.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

This project will not influence public use of streets and will have no long-term effects on traffic on road use so it cannot affect alternative transportation.

Utilities and Service Systems

Discussion:

None of these projects involve in-building water systems or wastewater. They are in upland areas or adjacent to creeks. Generally, they are not involved with utilities and service systems.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

a) & b) This project will not involve any additional flows to wastewater treatment facilities. It will not require any additional capacity of water systems or expansion of sources.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒

The program will not result in new or expanded stormwater drainage facilities.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒

The project will not require any change in public water systems.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒

The Mendocino County Permit Coordination Program will neither create wastewater nor require wastewater treatment facilities.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒
f) &g) Any solid waste generated by the program, such as debris removed from stream channels, will be taken to approved landfills. Since very little waste will be generated, landfill capacity will not be challenged. The program will comply with solid waste regulations.				
Mandatory Findings of Significance	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion:

a), b) and c) The Mendocino County Permit Coordination Program will not degrade the quality of the environment, substantially reduce habitat for fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Such a potential does not exist because the program will be implemented in such a manner as to avoid short-term impacts on sensitive resources. The program has no potential to adversely impact cultural resources or human beings. The program does not have the potential for adverse cumulative impacts. The program will result in improvement in water quality, natural habitat functioning, forest and agricultural sustainability.

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