



**Seneca Healthcare District
Seneca Healthcare Facility Replacement Project
County of Plumas, California**

Biological Resources Report

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1.0 INTRODUCTION

Sequoia Ecological Consulting, Inc. (Sequoia) has prepared this Biological Resources Report for the proposed Seneca Healthcare Facility Replacement Project site (hereafter referred to as “the Project site”) located at latitude 40.307100°, longitude -121.236602° in the unincorporated community of Chester, Plumas County, California (Figures 1 and 2). Our analysis provides a description of existing biological resources on the Project site and identifies constraints that could arise from potentially significant impacts that could occur to sensitive biological resources from the proposed Project.

Biological resources include common plant and animal species, as well as special-status plants and animals as designated by the U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), National Marine Fisheries Service (NMFS), and other resource organizations including the California Native Plant Society (CNPS). Biological resources also include “waters of the United States” and “waters of the state” of California, as regulated by the U.S. Army Corps of Engineers (USACE), California Regional Water Quality Control Board (RWQCB), and CDFW. Please note that this analysis assesses the potential for impacts to regulated waters but does not provide the level of detail required for a formal delineation of Waters of the United States suitable for submittal to USACE as defined by the Clean Water Act.

In accordance with the California Environmental Quality Act (CEQA) checklist, this Biological Resources Report also provides mitigation measures for “potentially significant” impacts that could occur to biological resources pursuant to CEQA (Pub. Resources Code §§ 21000 et seq.; 14 Cal. Code Regs §§ 15000 et seq.). The prescribed mitigation measures would reduce impacts to levels considered “less than significant” pursuant to CEQA. Accordingly, this Biological Resources Report is suitable for review by Seneca Healthcare District (CEQA Lead Agency) and Responsible Agencies for the proposed Project pursuant to CEQA.

2.0 LOCATION AND SETTING

Healthcare Facility Replacement Project

The property is located adjacent to the existing Seneca Healthcare Facility at 199 Reynolds Road, Chester, CA. The tentative lot line adjustment for the Seneca Healthcare District is provided in Appendix A, showing the proposed configuration of the 11.78-acre resultant parcel. Seneca Healthcare District is planning to annex the property to build a replacement, as referenced in the Facility Master Planning document (Seneca Healthcare District, 2021). Sequoia reviewed data provided by the District to assess potential impacts to sensitive biological resources (Figure 3). The proposed Project consists of developing additional health care facilities on the resultant parcel. The Project site is characterized as predominately a Jeffrey pine forest plantation. The remaining land is developed as existing facilities for the Seneca Healthcare District. The Stover Ditch runs approximately west to east, north of the property, which supports riparian woodland along the watercourse and adjacent to the property.



Collins Pines Optional Landing Approach

The Collins Pines property is located adjacent to and west of the Proposed Project parcel (Figure 4). This parcel is meant to be an optional flight approach area for the helipad at the western edge of the Proposed Project parcel, as referenced in the Facility Master Planning document (Seneca Healthcare District, 2021), and will be analyzed as an alternative to the Proposed Project (i.e., the Proposed Project plus the helipad and flight path). Sequoia reviewed data provided by the District to assess potential impacts to sensitive biological resources. The additional Project site is characterized as predominately a Jeffrey pine forest plantation. The remaining land is developed as existing facilities for the Seneca Healthcare District. A dried swale runs approximately northeast to southwest through the center of entirety of the proposed flight line.

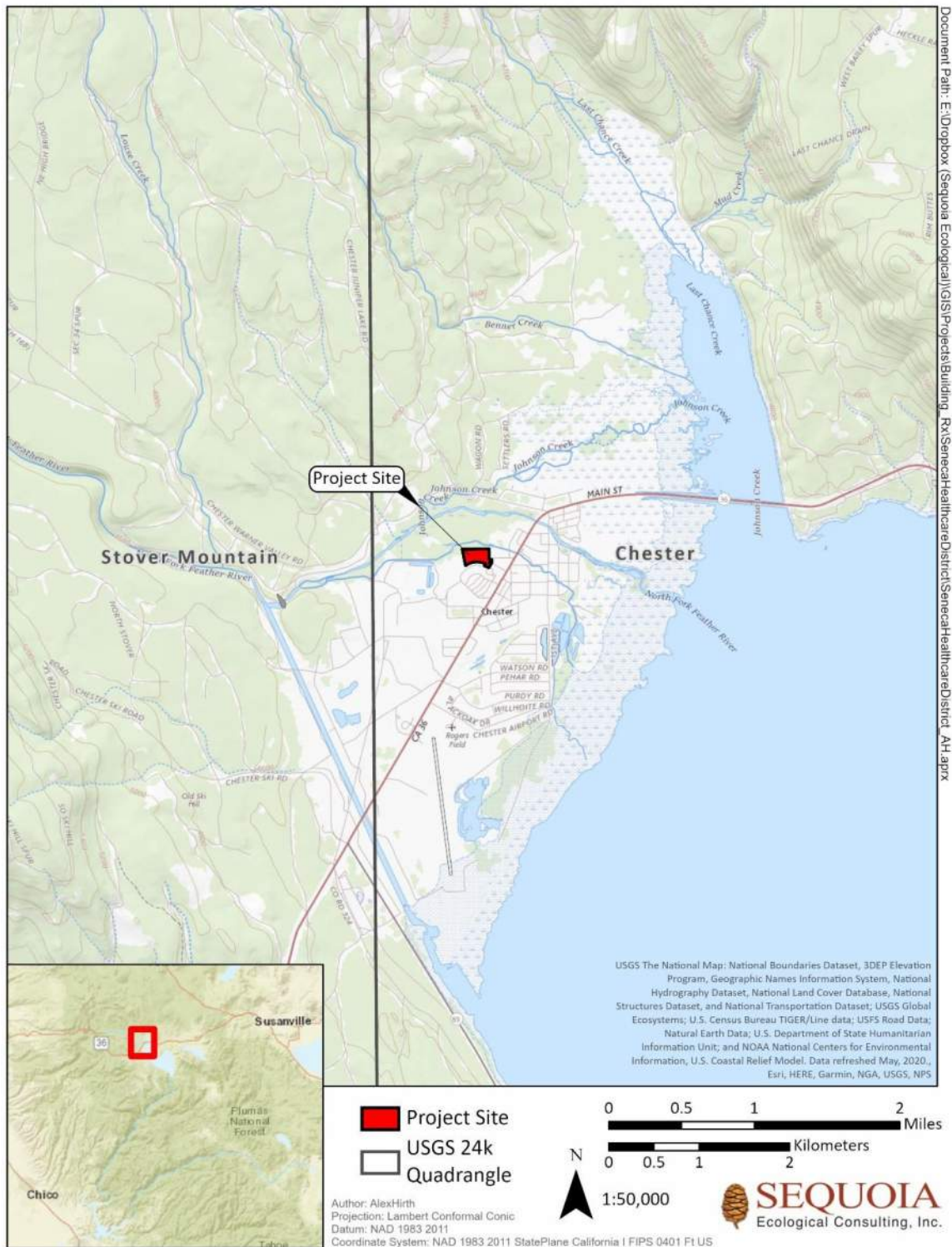


Figure 1. Regional Map of the Seneca Healthcare Facility Replacement Project Site.

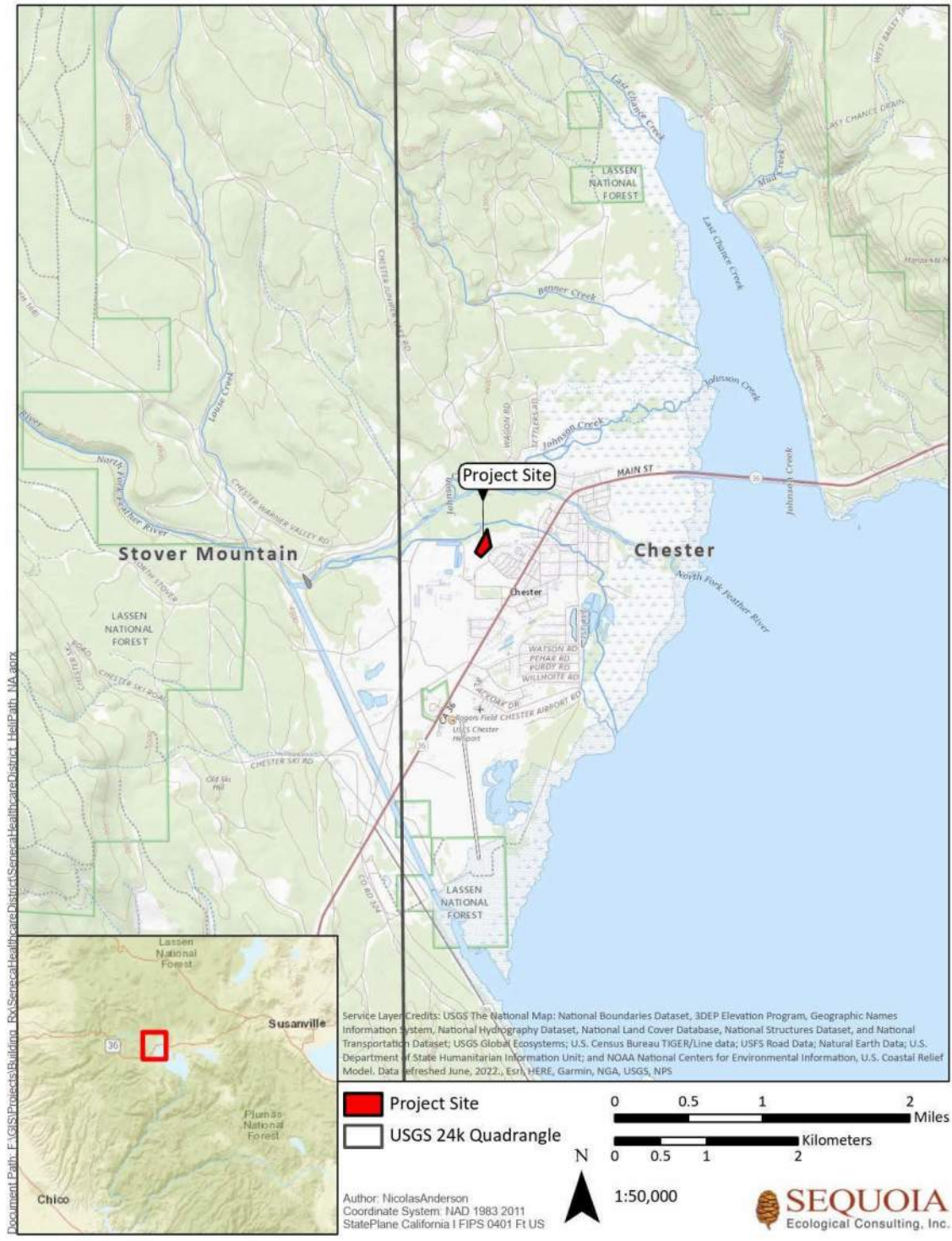


Figure 2. Regional Map of the Seneca Healthcare Facility Proposed Helicopter Approach.

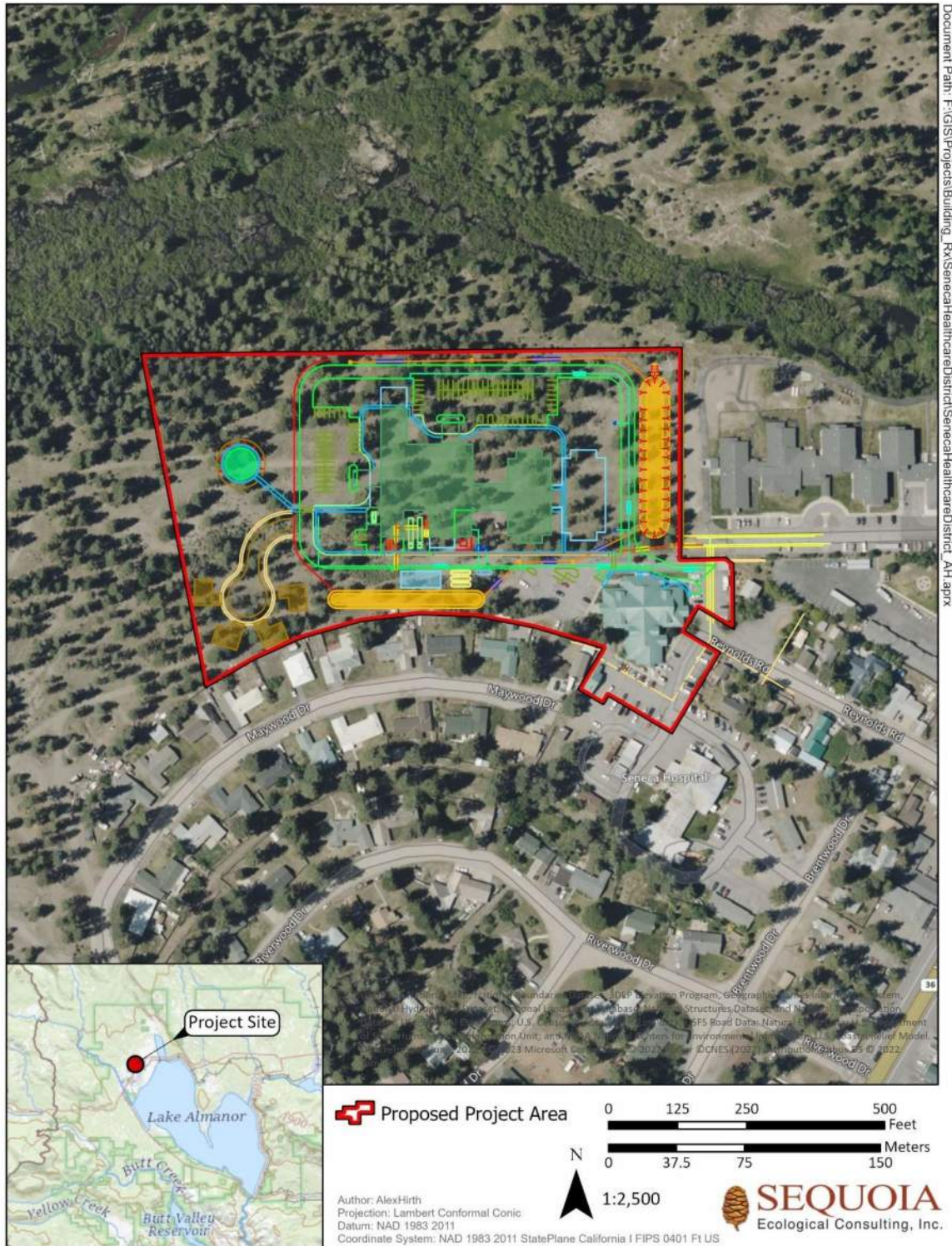


Figure 3. Location Map of the Seneca Healthcare Facility Replacement Project Site.



3.0 PROJECT DESCRIPTION

Seneca Healthcare District (SHD; District) proposes to provide for the continuing care of their Plumas County and Chester area community through the construction of a new acute-care hospital and skilled nursing facility building to replace their existing aged facilities. Primarily built in the 1950s and 1970s, SHD’s current hospital buildings present a challenge to continued high-quality care in the size, accessibility, and environment of the current facilities. Considering the financial implications associated with the potential SB-1953 mandated seismic compliance upgrades of the existing buildings, SHD has elected to build new facilities and expand upon the current services offered by SHD. The existing facilities will be repurposed for non-acute care uses that have yet to be determined, with preliminary candidate uses including outpatient behavioral health or expanded physical therapy. The existing facilities compared with proposed facilities are summarized in **Table 1**. The proposed Project area totals 11.8 acres. The Option 1 helipad flight path area outside the Project area entails approximately 6 acres.

Table 1. Existing and Proposed Facilities

| Existing | Proposed |
|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">▪ 10-bed acute care, no negative pressure | <ul style="list-style-type: none">▪ 10-bed acute care, 2 of those with isolation capabilities |
| <ul style="list-style-type: none">▪ 2-bed open-bay emergency room | <ul style="list-style-type: none">▪ 3-bed private emergency room and Trauma/procedure room within ED |
| <ul style="list-style-type: none">▪ 16-bed skilled nursing facility | <ul style="list-style-type: none">▪ 26-bed skilled nursing facility |
| <ul style="list-style-type: none">▪ Imaging including x-ray, CT outside hospital in portable building, MRI via trailer | <ul style="list-style-type: none">▪ Imaging to include x-ray, CT, ultrasound, and MRI via trailer |
| <ul style="list-style-type: none">▪ Operating room & 2-bed patient recovery | <ul style="list-style-type: none">▪ Operating room, procedure room, & 3-bed patient recovery |



| Existing | Proposed |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none">▪ All spaces right-sized to allow for improved workflow, updated/improved infrastructure, updated medical equipment, and ADA accessibility per current code |

The proposed facilities would entail two different building types, all under one roof: an acute-care replacement hospital (OSHDP-1), and an expanded skilled nursing facility (OSHDP-2). The intent of the design is to provide the units as separate building types with differing functions, but connected with the required seismic and building separations, so that there is seamless flow between each unit, built-in efficiencies for circulation of staff and patients, and shared use of spaces. There is also a proposed non-California Department of Health Care Access and Information (HCAI) support services building, detached, which would support the entire facility, and employee housing.

In anticipation of potential approval of the proposed Project, SHD has acquired 10 acres of land on parcels adjacent to their existing campus (APN 100-110-030) and has completed a lot line adjustment. The additional land was purchased from Collins Pine, an adjacent landowner within the timber operations industry. SHD plans to use the surrounding forested habitat to provide restorative and healing views of this scenery for the residents and patients, and to also maintain timber as appropriate in public areas to honor the neighboring industry. Secondary access is anticipated to be provided via the existing clinic's rear parking lot, through to Brentwood Drive. Alternatively, an easement to provide a secondary access road may be granted at the northwest corner of the proposed Project area through the Wildwood Senior Community. The easement would be granted by Plumas County Community Development Commission.

SHD's goals are to create a facility that will provide improved healthcare services to the community for another 70 years or more, continue to support the well-being and security of the community, and be able to grow and progress as both healthcare and the community advance into the future.

The region surrounding Chester has recently been previously impacted by forest fires, primarily the 2021 Dixie Fire. It is the desire of SHD to create a new facility that responds to the evolving requirements of wildland fire safety, allowing staff to continue to provide care to patients



during emergencies. Further, final design of the Project will integrate access, disaster staging, infrastructure resiliency, and fire-resistant building materials.

To fund this construction effort, SHD is pursuing US Department of Agriculture (USDA) funding as well as other funding sources, including a public bond measure (Measure B, passed in the November 8, 2022 election) and philanthropic offerings by the community. USDA funding will require compliance with the National Environmental Policy Act (NEPA), which will be completed as a parallel process.

The new facility is intended to provide current state-of-the-art healthcare technology in a new, clean, modern building. The cumulative square footage of the facilities will total 45,000 square feet, plus up to 3,000 square feet of out/support services structures, and up to 10,000 square feet of employee housing. The basic functions of the three primary buildings are as follows:

OSHPD-1 Building/Hospital

- Nursing Services/Med-Surg – 8 semi-private and 2 private/isolation, total 10 beds
- Basic Emergency Services – 3 exam rooms, a trauma room that can be converted to 2 exam rooms, and 4 low-acuity waiting areas
- Pharmaceutical Services – a drug room for supply and distribution
- Laboratory Services
- Dietary Services – kitchen and dining
- Imaging Services – X-Ray, CT Scanner, Ultrasound, and mobile MRI
- Ambulatory Surgery
- Physical Therapy
- Retail Pharmaceutical (kiosks in entry Mall)

OSHPD-2 Building/Skilled Nursing Facility

- Skilled Nursing Beds – 24 semi-private and 2 private/isolation, total 26 beds
- Occupational Therapy

Non-OSHPD Support Services Buildings

- Maintenance, Materials Management, Laundry Services
- Employee Housing



In addition to the healthcare facilities described above, SHD plans to construct employee housing in the southwest corner of the site. The conceptual plan includes construction of up to ten (10) 1,000-square-foot residential units that will house up to ten employees of SHD and their families.

The facility will have onsite a typical staff of 48 at peak hours. An onsite surface parking lot containing 102 parking spaces is proposed to serve the needs of the facility, per Plumas County (County) code. The proposed use of the property as a skilled nursing facility would be complementary to the existing hospital to provide a full spectrum of quality health services for Plumas County residents.

The proposed Project will require the following discretionary decisions by SHD, Plumas County, Plumas Local Agency Formation Commission (LAFCO), and the California Department of Forestry and Fire Protection (CAL FIRE):

- A. Proposed Project:** SHD will need to approve the proposed healthcare facilities Project, including the acute-care hospital, skilled nursing facility, support buildings, employee housing, parking lots, access roads (including a potential easement for main entrance and secondary emergency access across the adjacent Wildwood retirement home parcel), and related items.
- B. Option 1: Heliport and Flight Path Element:** As an optional element of the proposed Project, SHD will consider approving construction of a heliport to accommodate helicopter ambulance services, including the landing pad, flight path modifications (tree removal), and pathways connecting the pad to the medical buildings.
- C. General Plan Amendment/Rezone:** Plumas County will need to approve a General Plan Amendment and Zone Change to accommodate the proposed Project.
- D. LAFCO Annexation:** The proposed Project will require LAFCO annexation of parcels 100-230-028 & 100-230-029 into Chester Public Utilities District for provision of water and sewer services and for fire protection. Water and sewer for the parcel is currently designated to come from County services, and fire protection is currently designated to be provided by CAL FIRE.
- E. CAL FIRE:** Tree removal on-site is a timberland conversion permit, needing CAL FIRE Timber Harvest Plan (THP) approval prior to tree removal permit issuance. CAL FIRE's approval of the THP is subject to their parallel, CEQA-equivalent process. Approval for tree removal at the Collins Pine property for the Option 1 Helipad and Flightpath Element is anticipated to be a utility right-of-way exemption.



At its discretion, SHD may approve the proposed Project (medical and housing facilities) with or without Option 1 (heliport and flight pathway). Option 1 is dependent upon SHD approval of the proposed Project, but the proposed Project has independent utility and is not dependent upon approval of Option 1.



4.0 REGULATORY SETTING

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies within the land use control and planning authority of local jurisdictions (in this instance, County of Plumas). Below we provide a summary of these regulatory authorities and a brief discussion on applicability to the proposed Project. More in-depth analyses are provided in Section 6 (Results) and Section 7 (Discussion and Impact Assessment).

4.1 Federal

4.1.1 *Federal Endangered Species Act*

The Federal Endangered Species Act (FESA) provides protection for federally listed endangered and threatened species and their habitats. A project may obtain permission to take federally listed species in one of two ways: a Section 10 Habitat Conservation Plan (HCP) issued to a non-federal entity, or a Section 7 Biological Opinion from the USFWS and/or the National Oceanic and Atmospheric Administration (NOAA) issued to another federal agency that funds or permits an action (e.g., USACE). Under either Section of the FESA, adverse impacts to protected species are avoided, minimized, and mitigated. Both cases require consultation with the USFWS and/or NMFS, which ultimately issues a Biological Opinion determining whether the federally listed species may be incidentally taken pursuant to the proposed action and authorizing incidental take.

Section 7 of FESA requires that federal agencies develop a conservation program for listed species (FESA 7(a)(a)) and that they avoid actions that will jeopardize the continued existence of the species or result in the destruction or adverse modification of the species' designated critical habitat (FESA 7(a)(2)). FESA Section 9 prohibits all persons and agencies from take of threatened and endangered species (though the prohibition on taking listed plants only applies to plants taken from "areas under Federal jurisdiction" or plants taken "in knowing violation of any law or regulation of any State or in the course of any violation of a State criminal trespass law"). Those who violate this mandate face civil and criminal penalties, including civil fines of up to \$25,000 per violation, as well as criminal penalties of up to \$50,000 and imprisonment for one year. Section 10 of FESA regulates a wide range of activities affecting fish and wildlife designated as endangered or threatened and the habitats on which they rely. Section 10 prohibits activities affecting these protected fish and wildlife species and their habitats unless authorized by a permit from USFWS or NMFS. These permits may include incidental take permits, enhancement of survival permits, or recovery and interstate commerce permits. HCPs under Section 10(a)(1)(B) provide for partnerships with non-federal parties to conserve the ecosystems upon which listed species depend.



HCPs are required as part of an application for an incidental take permit under Section 10. They describe the anticipated effects of the proposed take, how those impacts will be minimized or mitigated, and how the HCP will be funded.

4.1.1.1 Applicability to the Proposed Project

FESA gives regulatory authority to USFWS for federally listed terrestrial species and non-anadromous fish. NMFS has regulatory authority over federally listed marine mammals and anadromous fish.

Sequoia understands that the proposed Project may receive funding from the United States Department of Agriculture, a federal agency, which would subject the Project to review under Section 7 of FESA. The Project area does not appear to provide suitable habitat to plant, wildlife and/or fish species protected by FESA. However, no protocol surveys have been conducted to-date.

Healthcare Facility Replacement Project

With implementation of the mitigation measures discussed in Section 3 and listed in the “Impacts Analysis” section below, impacts to federally listed species can be mitigated to a level considered less than significant pursuant to CEQA.

Helipad and Flight Path Alternative

With implementation of the mitigation measures discussed in Section 3 and listed in the “Impacts Analysis” section below, impacts to federally listed species can be mitigated to a level considered less than significant pursuant to CEQA.

4.1.2 Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (MBTA) (16 USC §§ 703–711), as administered by the USFWS, makes it unlawful to “pursue, hunt, take, capture, kill, attempt to take, capture or kill, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export at any time, or in any manner, any migratory bird, or any part, nest, or egg of any such bird.” This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs.

4.1.2.1 Applicability to the Proposed Project

Healthcare Facility Replacement Project

The Project site provides suitable nesting habitat for common passerine (songbird) and raptor (bird of prey) species. These birds are protected pursuant to MBTA. Prior to commencement of Project-related activities, a pre-construction survey would be performed, and any active nests detected would be provided with an appropriately sized non-disturbance buffer. See Impacts Analysis section below.



Helipad and Flight Path Alternative

The Project site provides suitable nesting habitat for common passerine (songbird) and raptor (bird of prey) species. These birds are protected pursuant to MBTA. Prior to commencement of Project-related activities, a pre-construction survey would be performed, and any active nests detected would be provided with an appropriately sized non-disturbance buffer. See Impacts Analysis section below.

4.1.3 Bald and Golden Eagle Protection Act of 1940

The Bald and Golden Eagle Protection Act (BGEPA; 16 USC. 668-668c) prohibits anyone from taking, possessing, or transporting a bald eagle (*Haliaeetus leucocephalus*) or golden eagle (*Aquila chrysaetos*), or the parts, nests, or eggs of such birds without prior authorization. This includes inactive nests as well as active nests. Take means to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb. Activities that directly or indirectly lead to take are prohibited without a permit.

4.1.3.1 Applicability to the Proposed Project

Healthcare Facility Replacement Project

The Project site does not provide suitable foraging or nesting habitat for bald eagle; however, potentially suitable foraging and nesting habitat for bald eagle occurs in the vicinity of the Project site. This species is protected pursuant to the BGEPA and the MBTA. Prior to commencement of Project-related activities, a pre-construction survey for bald eagle would be performed, and active nests detected would be provided with an appropriately sized non-disturbance buffer. See Impacts Analysis section below.

Helipad and Flight Path Alternative

The Project site does not provide suitable foraging or nesting habitat for bald eagle; however, potentially suitable foraging and nesting habitat for bald eagle occurs in the vicinity of the Project site. This species is protected pursuant to the BGEPA and the MBTA. Prior to commencement of Project-related activities, a pre-construction survey for bald eagle would be performed, and active nests detected would be provided with an appropriately sized non-disturbance buffer. See Impacts Analysis section below.

4.1.4 U.S. Army Corps of Engineers – Clean Water Act – Section 404

USACE regulates activities within "waters of the United States" pursuant to congressional acts: Section 404 of the Clean Water Act (CWA; 1977, as amended) and Section 10 of the Rivers and Harbors Act of 1899. Section 404 of the CWA (1977, as amended) requires a permit for discharge of dredged or fill material into "waters of the United States." Under Section 404, "waters of the United States" are defined as all waters that are used currently, or were used in the past, or may be used in the future for



interstate or foreign commerce, including waters subject to the ebb and flow of the tide up to the high tide line. Additionally, areas such as wetlands, rivers, and streams (including intermittent streams and tributaries) are considered “waters of the United States.” The extent of wetlands is determined by examining the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. Under normal circumstances, all three of these parameters must be satisfied for an area to be considered a jurisdictional wetland under Section 404 of the CWA. Fill within wetlands is regulated under the CWA through a Nationwide Permit Program and an Individual Permit Program.

4.1.4.1 *Applicability to the Proposed Project*

Healthcare Facility Replacement Project

There is a wetland area, labeled as Forest/Shrub Wetland by NWI, that extends into the extreme northwest corner of the Project area and is likely regulated by the U.S. Army Corps of Engineers. The wetted area itself extends into the Project area by approximately 7 feet at the most. The dominant plant in this area is woolly sedge (*Carex pellita*). A formal wetland delineation was not conducted, but soils were black and there was a pooled area, with slow moving water – likely small tributaries from the riverine system identified on NWI. The wetland is on a low, streamside terrace, with an adjacent Jeffrey pine forest. The woody riparian vegetation (*Salix* sp.) extends into the Project area in three locations along the northern border – at the extreme northwest corner, the extreme northeast corner, and toward the middle of the northern boundary, but are not expected to be impacted by Project activities based on available Site Plans.

A dried swale is located on the extreme western edge of the Project area. Several willows (*Salix* sp.) were located off the Project area, and several black cottonwoods were located just within the Project boundary, but with no other evidence of wetland. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

A constructed ditch/basin is present along the south-eastern boundary of the Project area, adjacent to the paved medical clinic driveway. Although this feature may hold small amounts of water at certain times for the year, it is manmade and likely for stormwater conveyance, and does not possess hydrophytic vegetation, hydric soils, or wetland hydrology and therefore does not meet the definition for “waters of the United States”.

It is not anticipated that work activities will impact the wetted area, the transition zone, or the dried swale, but Sequoia recommends that they be designated as an environmentally sensitive areas to aid in avoidance. If these areas cannot be avoided, additional permitting may be required to satisfy regulatory obligations pursuant to Section 404 of the Clean Water Act and related statutes.



Helipad and Flight Path Alternative

The dried swale mentioned above continues into the Collins Pines parcel. No wetland-associated vegetation was noted throughout the swale area. No black soils are present—only sand and cobble. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities.

4.1.5 U.S. Department of Agriculture – Rural Development

USDA Rural Development is a mission area within the USDA which provides programs intended to improve the economy and quality of life in rural America. One such program is the Community Facilities Direct Loan Program, which provides funding to rural healthcare facilities such as SHD. As a federal agency, the USDA is required to evaluate the impact of projects it authorizes, conducts, or funds under the National Environmental Policy Act (NEPA), which includes preparation of an Environmental Assessment and a determination that the Project will either have a Finding of No Significant Impact (FONSI) or require the preparation of an Environmental Impact Statement (EIS), if the NEPA Action is not categorically excluded. The required level of NEPA analysis for the Project is currently unknown.

4.1.5.1 Applicability to the Proposed Project

Potential biological impacts of the Project must be taken into consideration by the USDA under NEPA, as indicated in the USDA Rural Development Community Facilities Direct Loan Program guidebook. The environmental review process must be completed before the Project is considered eligible for federal financial assistance. This Biological Resource Report substantially meets the level of information required for biological impact analysis under NEPA.

4.2 State

4.2.1 California Environmental Quality Act

CEQA requires public agencies in California to analyze and disclose potential environmental impacts associated with a proposed discretionary project that the agency will carry out, fund, or approve. Any significant impact must be mitigated to the extent feasible, below the threshold of significance.

4.2.1.1 Applicability to the Proposed Project

This document is suitable for use by SHD as CEQA lead agency for preparation of any CEQA review document prepared for the proposed Project. This report has been prepared as a Biology Section suitable for incorporation into the Biology Section of an Initial Study/Mitigated Negative Declaration.

4.2.2 California Endangered Species Act

The CDFW is responsible for administering the California Endangered Species Act (CESA). Section 2080 of the California Fish and Wildlife Code prohibits take of any species that the Fish and Wildlife Commission



determines to be an endangered species or a threatened species. However, CESA does allow for take that is incidental to otherwise lawful development projects. Sections 2081(b) and (c) of CESA allow the CDFW to issue an incidental take permit for a state listed threatened and endangered species only if specific criteria are met (i.e., the effects of the authorized take are minimized and fully mitigated). The measures required to meet this obligation shall be roughly proportional in extent to the impact of the authorized taking on the species. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation.

4.2.2.1 Applicability to the Proposed Project

Healthcare Facility Replacement Project

No state listed plant or animal species would likely be impacted by the proposed Project (Tables 1 and 3). Historically, the Project site has been utilized as timber land subject to periodical harvesting. As a result, the Project area is composed of a younger, uniform stand of trees with limited native habitat present and no suitable habitat for special-status plants and/or wildlife. Furthermore, no special-status plants or wildlife were detected during surveys conducted by Sequoia in June of 2021 or June of 2022. As such, no state listed plant or wildlife species would likely be impacted by the proposed Project and the proposed Project should not be required to obtain authorization under CESA.

Helipad and Flight Path Alternative

No state listed plant or animal species would likely be impacted by the proposed Project (Tables 2 and 4). Historically, the Project site has been utilized as timber land. As a result, the Project area comprises a younger, uniform stand of trees with limited native habitat present and no suitable habitat for special-status plants and/or wildlife. Furthermore, no special-status plants or wildlife were detected during surveys conducted by Sequoia in September of 2022. As such, no state listed plant or wildlife species would likely be impacted by the proposed Project and the proposed Project should not be required to obtain authorization under CESA.

4.2.3 California Fish and Game Code – Section 1600 – Lake or Streambed Alteration Agreement

The CDFW regulates activities within watercourses, lakes, and in-stream reservoirs. Under Section 1602 of the California Fish and Game Code (CFGF)—often referred to as the Lake or Streambed Alteration Agreement (LSAA)—the CDFW regulates activities that would alter the flow or change or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, or lake. Each of these activities requires a Section 1602 permit. Section 1602 requires the CDFW to be notified of any activity that might affect lakes and streams. It also identifies the process through which an applicant can come to an agreement with the state regarding the protection of these resources, both during and following construction.



4.2.3.1 Applicability to the Proposed Project

There are no streams or drainages that would likely be regulated by CDFW and impacted by Project activities. Accordingly, an LSAA with CDFW would not be necessary for the Project.

Healthcare Facility Replacement Project

There is a wetland area, labeled as Forest/Shrub Wetland by NWI, that extends into the extreme northwest corner of the Project area. The wetted area itself extends into the Project area by approximately 7 feet at the most. The dominant plant in this area is woolly sedge (*Carex pellita*). A wetland delineation was not performed, however the area possessed black soils, and there was a pooled area, with slow moving water—likely small tributaries from the riverine system identified on NWI. The wetland is located on a low, streamside terrace, with an adjacent Jeffrey pine forest. The woody riparian vegetation (*Salix* sp.) extends into the Project area in three locations along the northern border—at the extreme northwest corner, the extreme northeast corner, and toward the middle of the northern boundary, but none are expected to be impacted by the Project based on current Site Plans.

Also located in the northwest corner is a transitional zone between Jeffrey pine forest and riparian habitat associated with the wetland area, as indicated by the presence of willows and several black cottonwoods that could be included as a regulated riparian feature if a Streambed Alteration Agreement was deemed necessary for the associated wetland area.

A dried swale is located on the extreme western edge of the Project area. Several willows (*Salix* sp.) were located off the Project area, and several black cottonwoods were located just within the Project boundary, but with no other evidence of wetland. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

A constructed ditch/basin is present along the south-eastern boundary of the Project area, adjacent to the paved medical clinic driveway. Although this feature may hold small amounts of water at certain times for the year, it is manmade and likely for stormwater conveyance, does not possess wetland characteristics, does not have connectivity to other waters, is constructed in uplands, and it is not modifying an original drainage feature. Therefore, this feature should be exempt from CFGC Section 1600.

It is not anticipated that work activities will impact the wetted area, the transition zone, or the dried swale, but Sequoia recommends that they be designated as an environmentally sensitive areas to aid in avoidance. If these areas cannot be avoided, additional permitting may be required to satisfy CFGC. The constructed ditch is located within the anticipated construction zone but is not likely to require a 1600 or 1602 permit.



Helipad and Flight Path Alternative

The dried swale mentioned above continues on into the Collins Pines parcel. No wetland-associated vegetation was noted throughout the swale area. No black soils are present—only sand and cobble. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities.

4.2.4 California Fish and Game Code – Section 3500 – Nesting Bird Protection

CFGC Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by the CFGC or any regulation made pursuant thereto. CFGC Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that elements of a project (specifically vegetation removal or construction near nest trees) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, which may be subject to approval by the CDFW and/or the USFWS.

4.2.5 California Fish and Game Code – Fully Protected Species

CFGC Sections 3505, 3511, 4700, 5050, and 5515 afford full protection to several specific wildlife species. Fully protected species cannot be taken or possessed under state law, even if federal take authorization is issued, except in connection with a natural communities conservation plan (NCCP) or for the purpose of scientific research and relocation of bird species for the protection of livestock.

4.2.5.1 Applicability to the Proposed Project

The Project site provides marginally suitable habitat for wildlife protected pursuant to CFGC § 3500 and the MBTA. As such, pre-construction surveys for these species would need to be conducted prior to Project commencement to ensure no direct mortality of these species occurs owing to the proposed Project. See Impacts Analysis section below.

Healthcare Facility Replacement Project

The Project site provides marginally suitable habitat for wildlife protected pursuant to CFGC § 3500 and the MBTA. As such, pre-construction surveys for these species would need to be conducted prior to Project commencement to ensure no direct mortality of these species occurs owing to the proposed Project. See Impacts Analysis section below.

Helipad and Flight Path Alternative

The Alternative 1 flight path provides marginally suitable habitat for wildlife protected pursuant to CFGC § 3500 and the MBTA. As such, pre-construction surveys for these species would need to be conducted



prior to Project commencement to ensure no direct mortality of these species occurs owing to the proposed Project. See Impacts Analysis section below.

4.2.6 Regional Water Quality Control Board (RWQCB) – Clean Water Act – Section 401 and Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and RWQCB regulate activities in "waters of the state" (which includes wetlands) through two sources of legal authority: Section 401 of the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) (Wat. Code, Div. 7, § 13000 et seq.). The Section 401 water quality certification program allows the state to ensure that activities requiring a federal permit or license comply with state water quality standards. Though similar to Section 404 and 401 requirements, the Porter-Cologne Act applies to all "waters of the state" rather than to the portions thereof below ordinary high water mark. "Waters of the state" is defined as any surface water or groundwater, including saline waters, within the boundaries of the state (Water Code § 13050(e)).

The Porter-Cologne Act requires any person discharging waste or proposing to discharge waste in any region that could affect the quality of the "waters of the state" to file a report of waste discharge. Pursuant to the Porter-Cologne Act, the RWQCB also regulates "isolated wetlands." Functionally, the RWQCB typically evaluates whether an additional waste discharge requirement is necessary for the balance between federal and state jurisdictional boundaries during the 401 certification process. The RWQCB issues a permit or waiver that includes implementing water quality control plans that reflect the beneficial uses to be protected. Waters of the State subject to RWQCB regulation extend to the top of bank, as well as isolated water/wetland features.

On April 2, 2019, the SWRCB adopted Resolution 2019-0015, thereby adopting a document entitled, "State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State" ("Procedures") for inclusion in the Water Quality Control Plans for Inland Surface Waters, Enclosed Bays, and Estuaries of California.

In taking this action, the SWRCB noted that under the Porter-Cologne Act, discharges of dredged or fill material to waters of the state are subject to waste discharge requirements or waivers thereof. The SWRCB further explained that "although the state has historically relied primarily on requirements in the CWA to protect wetlands, U.S. Supreme Court rulings reducing the jurisdiction of the CWA over wetland areas by limiting the definition of 'waters of the United States' have necessitated the use of California's independent authorities under the Porter-Cologne Act to protect these vital resources."

The Office of Administrative Law (OAL) approved the Procedures on August 28, 2019. Pursuant to the Procedures, the effective date is nine months upon OAL approval. Accordingly, the Procedures became effective May 28, 2020.

By adopting the Procedures, the SWRCB mandated and standardized the evaluation of impacts and protection of waters of the state from impacts due to dredge and fill activities. The Procedures include: (1) a wetland definition; (2) a jurisdictional framework for determining if a feature that meets the



wetland definition is a water of the state; (3) wetland delineation procedures; and (4) procedures for application submittal, and the review and approval of dredge or fill activities.

The Procedures define an area as a wetland if it meets three criteria: wetland hydrology, wetland soils, and (if vegetated) wetland plants. An area is a wetland if: (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Waters of the state, by definition, includes more aquatic features than waters of the U.S., which defines the jurisdiction of the federal government. Waters of the state are not so limited. In addition, the federal definition of a wetland requires a prevalence of wetland vegetation under normal circumstances. To account for wetlands in arid portions of the state, the SWRCB's definition differs from the federal definition in that an area may be a wetland even if it does not support vegetation. If vegetation is present, however, the SWRCB's definition requires that the vegetation be wetland vegetation. The SWRCB's definition clarifies that vegetated and unvegetated wetlands will be regulated in the same manner.

The Procedures also include a jurisdictional framework that applies to aquatic features that meet the wetland definition. The jurisdictional framework will guide applicants and staff in determining whether an aquatic feature that meets the wetland definition will be regulated as a water of the state. The jurisdictional framework is intended to exclude from regulation any artificially created, temporary features, such as tire ruts or other transient depressions caused by human activity, while still capturing small, naturally occurring features, such as seasonal wetlands and small vernal pools that may be outside of federal jurisdiction. The Procedures do not expand the SWRCB's jurisdiction beyond areas already under SWRCB's jurisdiction.

The Procedures exclude the following agricultural features from the protections accorded to wetlands: (1) ditches with ephemeral flow that are not a relocated water of the state or excavated in a water of the state; (2) ditches with intermittent flow that are not a relocated water of the state or excavated in a water of the state, or that do not drain wetlands other than any wetlands described in (4) or (5) below; (3) ditches that do not flow, either directly or through another water, into another water of the state; (4) artificially irrigated areas that would revert to dry land should application of waters to that area cease; or (5) artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, and settling basins.

The Procedures clarify what information and analysis the applicant needs to submit to have a complete application. The Procedures standardize when an alternative analysis needs to be conducted and set a minimum mitigation ratio for any permanent impacts to waters of the state resulting from dredge and fill activities.

When an alternatives analysis is required, the applicant must demonstrate that the proposed alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA). The term practicable means



available and capable of being done after taking into consideration cost, existing technology, and other logistics considering the overall project purpose.

4.2.6.1 *Applicability to the Proposed Project*

Healthcare Facility Replacement Project

A constructed ditch/basin is present along the south-eastern boundary of the Project area, adjacent to the paved medical clinic driveway. Although this feature may hold small amounts of water at certain times for the year, it is manmade and likely for stormwater conveyance, does not possess wetland characteristics, does not have connectivity to other waters, is constructed in uplands, and it is not modifying an original drainage feature. Further, the Procedures include an exemption for ditches with intermittent flow that are not a relocated water of the state or excavated in a water of the state or that do not drain wetlands or artificial, constructed waters. Therefore, this feature should be exempt from Waters of the State Procedures. A full wetland delineation was not conducted for the proposed Project.

A wetland area and riparian transition zone exist at the extreme northwest corner of the Project area. There is also a dried swale located at the extreme western edge of the Project. It is not anticipated that these areas will be directly impacted by the proposed Project, but we recommend that they be designated as an environmentally sensitive area to aid in avoidance. The wetland area or swale may fall under the RWQCB/SWRCB's jurisdiction pursuant to Section 401 of the CWA. Thus, prior authorization from the RWQCB/SWRCB pursuant to Section 401 of the CWA would be required if the proposed Project were to impact these features. Impacts to "waters of the state" would require mitigation to the satisfaction of the RWQCB prior to issuance of a permit for impacts to these features.

To further comply with the Porter-Cologne Act, adequate pre- and post-construction best management practices (BMPs) will be planned and incorporated into Project implementation plans to protect downstream waterways. In addition, the contractor will develop a stormwater pollution prevention plan that will be submitted to the SWRCB as a condition of Project approval demonstrating BMPs that will be installed/implemented prior to Project commencement. Stormwater protection and treatment measures will be implemented to ensure that the proposed Project remains in compliance with the Porter-Cologne Act.

Helipad and Flight Path Alternative

The dried swale mentioned above continues into the Collins Pines parcel. No wetland-associated vegetation was noted throughout the swale area. No black soils are present—only sand and cobble. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities.

To further comply with the Porter-Cologne Act, adequate pre- and post-construction best management practices (BMPs) will be planned and incorporated into Project implementation plans to protect downstream waterways. In addition, the contractor will develop a stormwater pollution prevention plan that will be submitted to the SWRCB as a condition of Project approval demonstrating BMPs that will be



installed/implemented prior to Project commencement. Stormwater protection and treatment measures will be implemented to ensure that the proposed Project remains in compliance with the Porter-Cologne Act.

4.3 Local

Sequoia reviewed documents for potential biological constraints, such as the Plumas County General Plan and government code (e.g., for tree ordinances). No biologically constraining or applicable measures were found.

5.0 METHODS

Sequoia performed various desktop and in-field assessments. Using those results, Sequoia employed various site assessments to evaluate the presence of and/or likelihood of occurrence of sensitive resources on the Project site.

5.1 Definitions

5.1.1 *Special-Status Species*

For the purposes of this document, special-status species include:

- Plant, fish, and wildlife species listed as Threatened or Endangered under FESA (50 CFR 17), and candidates for listing under the statute
- Species protected by the CFGC, including nesting birds and Fully Protected species
- Plant, fish, and wildlife species listed as Threatened or Endangered under CESA; and the laws and regulations for implementing CESA as defined in CFGC §2050 et seq. and the California Code of Regulations (CCR) 14 CCR §670.1 et seq., and candidates for listing under the statute (CFGC §2068)
- Species meeting the definition of ‘Rare’ or ‘Endangered’ under CEQA Guidelines 14 CCR §15125 (c) and/or 14 CCR §15380, including plants listed on CNPS Lists 1A, 1B, 2A, and 2B, 3, and 4. Plants occurring on CNPS Ranks 3 and 4 are “plants about which more information is necessary,” and “plants of limited distribution” (CNPS 2001). These plants may be included as special-status species on a case-by-case basis due to local significance or recent biological information (see additional definition information below)
- USFWS Birds of Conservation Concern
- Fully Protected species, as designated by the CDFW (CFGC 3511, 4700, 5050, and 5515)
- Species of Special Concern, as designated by the CDFW and required by 14 CCR §15380
- Avian species protected under the MBTA of 1918



Additional information regarding these definitions is provided below:

5.1.1.1 *Federally Threatened or Endangered Species*

A species listed as Threatened or Endangered under the FESA is protected from unauthorized “take” (that is, harass, harm, pursue, hunt, shoot, trap) of that species. If it is necessary to take a federally listed Threatened or Endangered species as part of an otherwise lawful activity, it would be necessary to receive permission from the USFWS prior to initiating the “take.”

5.1.1.2 *State Threatened or Endangered Species*

A species listed as Threatened or Endangered under the CESA is protected from unauthorized “take” (that is, harass, pursue, hunt, shoot, trap) of that species. If it is necessary to “take” a state Threatened or Endangered species as part of an otherwise lawful activity, it would be necessary to receive permission from CDFW prior to initiating the “take.”

5.1.1.3 *CDFW Species of Special Concern*

California Species of Special Concern are species in which their California breeding populations are seriously declining and extirpation from all or a portion of their range is possible. This designation affords no legally mandated protection; however, some of these species could be considered “rare” and must therefore be considered in any project that will, or is currently, undergoing CEQA review, and/or that must obtain an environmental permit(s) from a public agency.

5.1.1.4 *CNPS Rank Species*

The CNPS maintains an *inventory* of special-status plant species. This inventory has four lists of plants with varying rarity. These lists are: Rank 1, Rank 2, Rank 3, and Rank 4. Although plants on these lists have no formal legal protection (unless they are also state or federally listed species), CDFW requests the inclusion of Rank 1 species in environmental documents. In addition, other state and local agencies may request the inclusion of species on other lists as well. Rank 1 and 2 species are defined below:

- Rank 1A: Presumed extinct in California
- Rank 1B: Rare, threatened, or endangered in California and elsewhere
- Rank 2A: Plants presumed extirpated in California, but more common elsewhere
- Rank 2B: Rare, threatened, or endangered in California, but more common elsewhere

Under the CEQA review process only CNPS Rank 1 and 2 species are considered due to meeting CEQA’s definition of “rare” or “endangered.” However, Rank 3 and 4 species are not regarded as significant pursuant to CEQA.

5.1.1.5 *Fully Protected Birds*

Fully Protected birds are protected under CFGC 3511 and may not be “taken” or possessed (i.e., kept in captivity) at any time.



5.2 Desktop Review

Sequoia reviewed relevant databases and literature for baseline information regarding biological resources occurring and potentially occurring on the Project site and the immediate vicinity. The review included the following sources:

- USFWS Information for Planning and Consultation (IPaC) search (USFWS 2020), and Critical Habitat Portal (USFWS 2020; Appendix B and C; Figures 7)
- CNPS Online Inventory of Rare and Endangered Plants of California for the Chester, California and eight surrounding USGS 7.5-minute quadrangles (CNPS 2020; Figures 12 and 13)
- USFWS National Wetlands Inventory (NWI) (Figure 6)
- CDFW California Natural Diversity Database (CNDDB) for the Project polygon and a 3-mile buffer (CDFW 2020; Figures 10 and 11)
- Aerial photographs (Google Earth 2020)

5.3 Site Assessment

Sequoia biologist Liz Lopez conducted surveys on the Project site on June 3, 2022 and September 30, 2022 to record biological resources and to assess the limits of areas potentially regulated by resource agencies (i.e., preliminary hydrology analysis). Surveys involved searching all habitats on the site and recording all plant and animal species observed. Sequoia cross-referenced the habitats occurring on the Project site with the habitat requirements of regional special-status species to determine if the proposed Project could directly or indirectly impact these species. Any special-status species or suitable habitat was documented. In addition, Sequoia biologists mapped limits of potential jurisdictional features, as shown on Figures 5 and 6.

Tables 1-4 present the potential for occurrence of special-status plant and animal species known to occur in the vicinity of the Project site, along with their habitat requirements, occurrence classification, and basis for occurrence classification.

5.4 Wetland Assessment

Healthcare Facility Replacement Project

There is a wetland area, identified as “Forest/Shrub Wetland” as per NWI, that extends into the extreme northwestern corner of the Project area and is associated with a linear hydrologic feature mapped in the California Streams database labeled as “Stover Ditch” in Appendix A. The wetted area itself extends into the Project area by approximately 7 feet. The dominant plant in this area is woolly sedge (*Carex pellita*). Soils were black, with few faint mottles, and there was a pooled area, with slow moving water—likely small tributaries from the riverine system identified on NWI. The wetland is on a low, streamside terrace, with the adjacent Jeffrey pine forest approximately one foot higher in elevation. The woody



riparian vegetation (*Salix sp.*) extends into the Project area in three locations along the northern border—at the extreme northwest corner, the extreme northeast corner, and toward the middle of the northern boundary.

Also located in the northwest corner is a transitional zone between Jeffrey pine forest and riparian habitat associated with the wetland area, as indicated by the presence of willows and several black cottonwoods that could be included as a regulated riparian feature if a Streambed Alteration Agreement was deemed necessary for the associated wetland area.

A dried swale located on the extreme western edge of the Project area. Several willows were located off the Project area, and several black cottonwoods were located just within the Project boundary, but with no other evidence of wetland. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

A constructed ditch/basin is present along the south-eastern boundary of the Project area, adjacent to the paved medical clinic driveway. This feature does not possess wetland characteristics, but it may hold precipitation or snowmelt at certain times of year, and therefore may meet the RWQCB's definition of surface water.

It is not anticipated that work activities will impact the wetted area, the transition zone, or the dried swale, but Sequoia recommends that they be designated as environmentally sensitive areas to aid in avoidance. The constructed ditch is in an area where construction is anticipated to occur, but it does not meet the definition of "waters of the State" and is also exempt as per the Procedures and thus should not require additional permitting. If the potentially jurisdictional features (wetted area, transition zone, and dried swale) cannot be avoided, additional permitting may be required to satisfy USACE and CDFW.

These areas are presumed to be under the jurisdictions of USACE, RWQCB and CDFW pursuant to state and federal laws. It is not anticipated that work activities will impact these areas, but if this area cannot be avoided, additional permitting and delineation would be required.

Within the Project area, no additional potentially jurisdictional features were observed during the reconnaissance-level assessment on June 3, 2022 site visit.

Helipad and Flight Path Alternative

A dried swale continues from the original proposed Replacement area into the Collins Pines parcel, starting in the middle of the extreme northeast edge of the parcel and continuing throughout the entirety of the property to the southwest, where the swale splits off in two directions—one that continues southwest and one that travels approximately due west. There is also a swale near the northern end of the Project area that may be associated with the larger swale mentioned above—where the swale continues northwest and then splits again in two—one end which continues northwest and the other that continues southwest before abruptly tapering off. No wetland-associated vegetation was noted throughout either swale area. Toward the southern end, the swale began to look more like a



seasonal waterway, with some very minor bank cutting in some areas, and medium-sized smoothed cobble at the bottom of the potential waterway. However, piles of cobble are also present throughout the Collins Pines property, likely due to previous mining activities. The swale ultimately runs through a culvert, which is outside the Project area. No black soils are present—only sand and cobble. The swale itself looked to have been dry for several years and is unlikely to be affected by Project activities based on location.

Within the Project area, no additional potentially jurisdictional features were observed during the reconnaissance-level assessment on September 30, 2022 site visit.

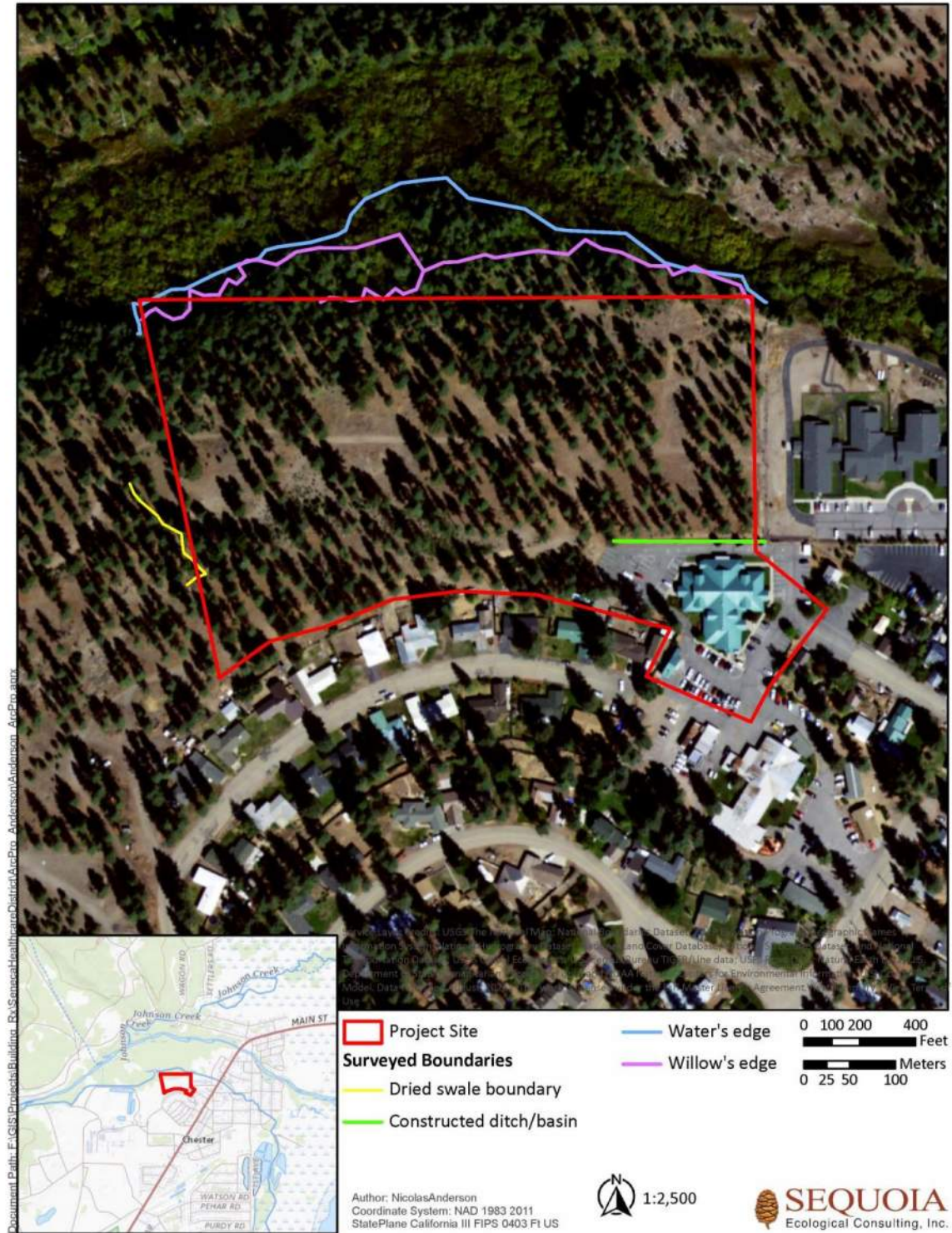


Figure 5. Limits of Potentially Jurisdictional Wetland Features in Proximity to the Seneca Healthcare Facility Replacement Project Site.

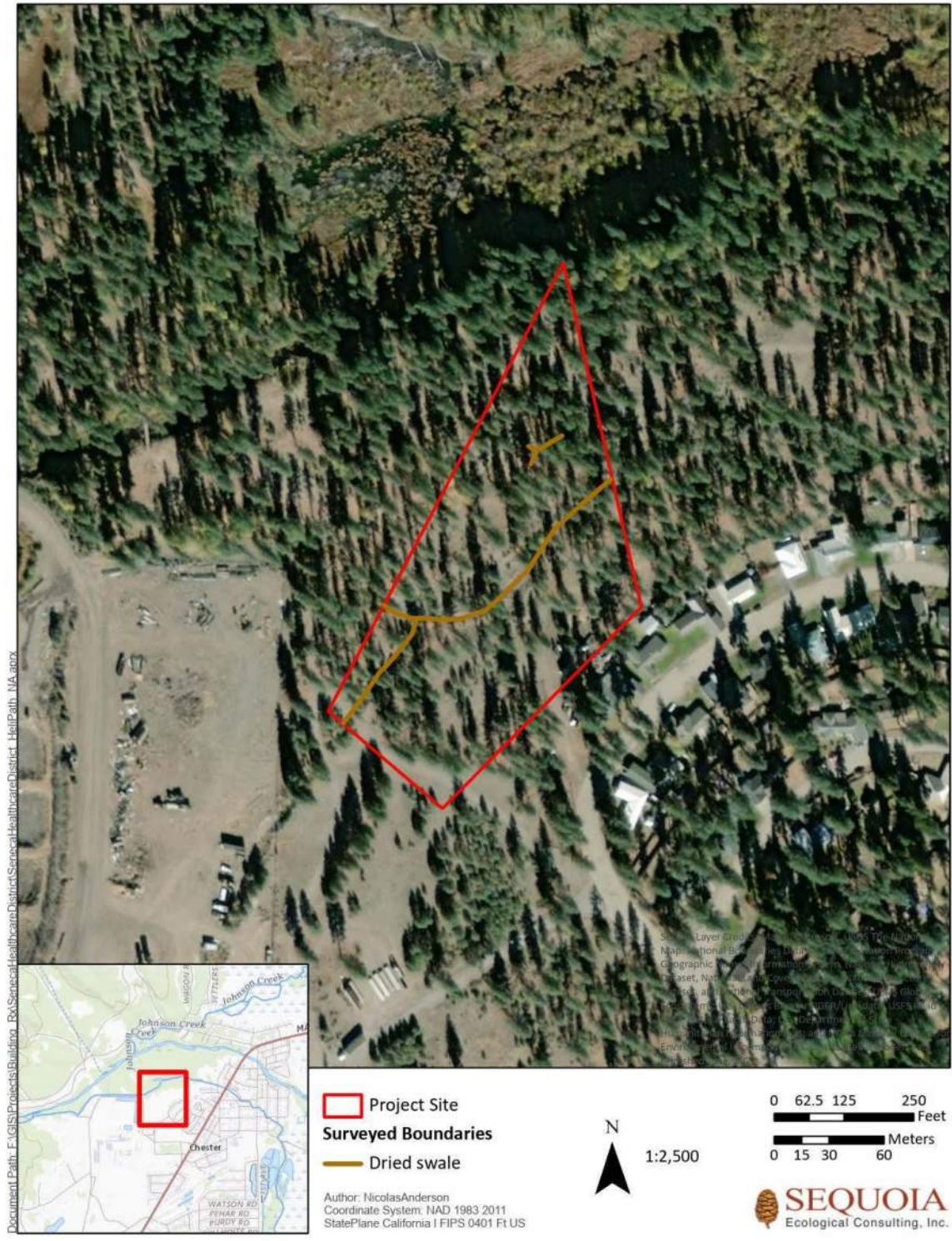


Figure 6. Limits of Potentially Jurisdictional Wetland Features in Proximity to the Seneca Healthcare Facility Proposed Helicopter Approach.



5.5 Habitat Assessments

Consecutive transects were traversed at approximately 30-foot intervals throughout the Project site and the Collins Pines property. During the surveys, the biologists scanned for special-status species, including Cascades frog (*Rana cascadae*), Sierra Nevada red fox (*Vulpes vulpes necator*), Sierra Nevada yellow-legged frog (*Rana sierrae*), bald eagle (*Haliaeetus leucocephalus*), greater sandhill crane (*Grus canadensis*), northern goshawk (*Accipiter gentilis*), southern long-toed salamander (*Ambystoma macrodactylum*), and osprey (*Pandion haliaetus*), among others, and/or for suitable habitat for these species, or sign of their presence. Any special-status species or suitable habitat was documented.

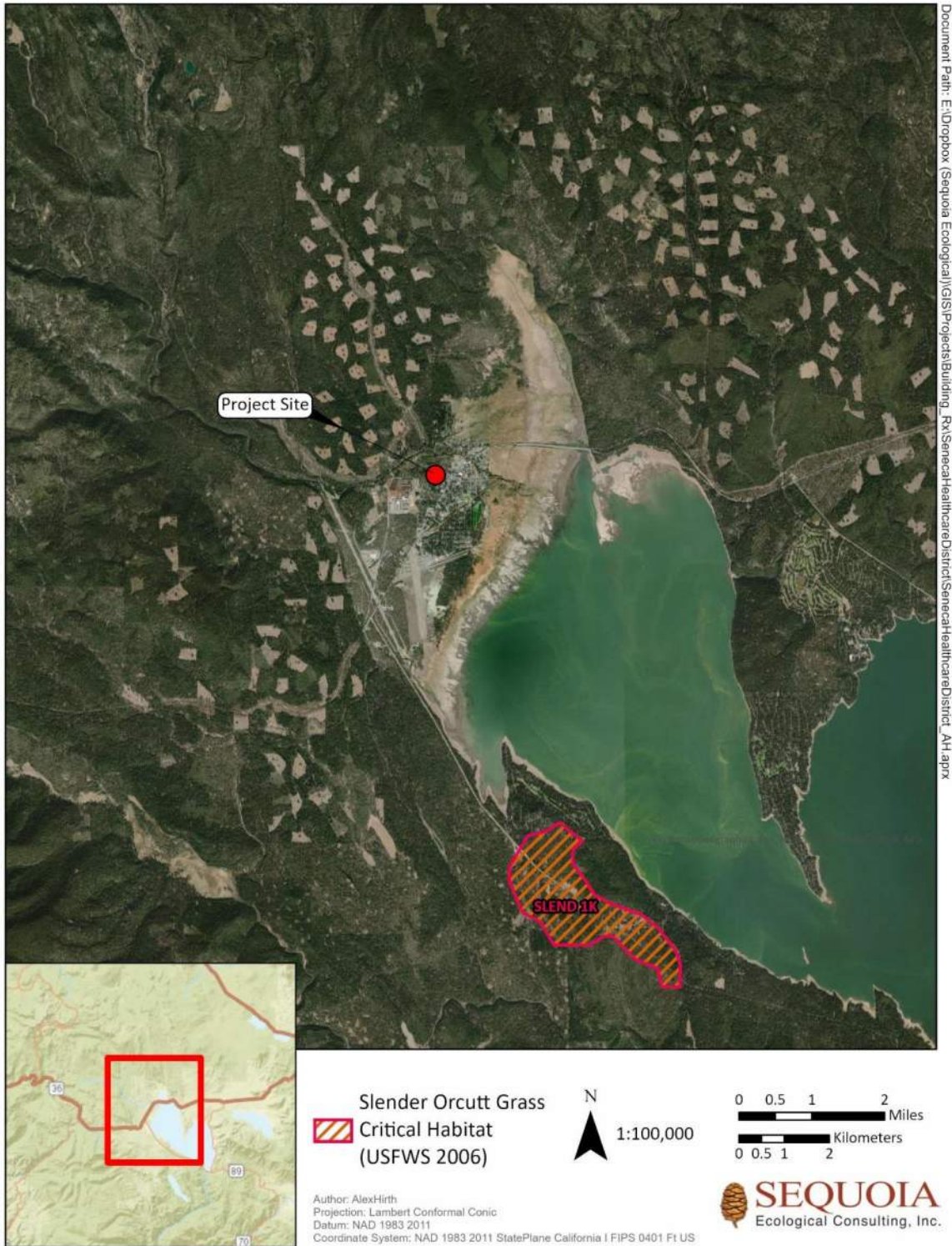


Figure 7. USFWS Critical Habitat in the Vicinity of the Seneca Healthcare Facility Replacement Project Site.





5.5.1 *Potential to Occur*

Following the site assessment, potential for special-status species to occur in the Project site was evaluated according to the following criteria:

- *No Potential.* Habitat on and adjacent to the site is clearly unsuitable for the species' requirements (foraging, breeding, cover, substrate, elevation, hydrology, plant community, site history, disturbance regime).
- *Low Potential.* Few of the habitat components meeting the species' requirements are present, and/or the majority of habitat on and adjacent to the site is unsuitable or of very poor quality. The species is not likely to occur on the site.
- *Moderate Potential.* Some of the habitat components meeting the species' requirements are present, and/or only some of the habitat on or adjacent to the site is unsuitable. The species has a moderate probability of occurring on the site.
- *High Potential.* All the habitat components meeting the species' requirements are present and/or most of the habitat on or adjacent to the site is highly suitable. The species has a high probability of occurring on the site.
- *Present.* Species is observed on the site or has been recorded (i.e., CNDDDB, other reports) on the site recently.



6.0 RESULTS

The results of the desktop review and site assessment of the proposed healthcare facility Replacement Project (conducted on June 3, 2022) and the helipad and flight path alternative (conducted on September 30, 2022) are presented below.

6.1 Topography and Hydrology

Healthcare Facility Replacement Project

The Project site is relatively flat throughout. A creek flows from west to east, north of the of the proposed Project site and enters the Project boundary at the northwest corner by approximately 7 feet. This creek is identified as “Stover Ditch” in Appendix A and is bordered on both sides by forested/shrub wetland (Figure 10). At the northwest corner, there is also an associated transition zone between Jeffrey pine forest and riparian woodland. Located at the southeastern end of the Project site is a constructed ditch/drainage, bordering the medical facility’s parking area. There is also a dried swale located on the extreme western edge of the Project area.

Elevation on the Project site ranges from 4,535 feet in the southeast corner to 4,550 feet above mean sea level (AMSL) in the northwest corner. Two soil types are present in the Project site, and both are well-drained gravel-dominant alluvium consistent with floodplain benches (Figure 8).

The climate of the Project site is transitional *Csb/Dsb* (Warm-summer Mediterranean climate/ Mediterranean-influenced warm-summer humid continental climate). Summers are warm, with average highs in the 80s (Fahrenheit); winters are cool and wet, with average highs in the 40s and average lows in the 20s. The average annual precipitation is approximately 34.35 inches, falling primarily between November and March, with an average annual snowfall of 127 inches (U.S. Climate Data 2021).

Helipad and Flight Path Alternative

The flight path alternative site is relatively flat throughout. Elevation within the flight path alternative site ranges between 4,540 and 4,550 feet AMSL. There is a dried swale running the length of the alternative site. Two soil types are present in the Project site, and both are well-drained gravel-dominant alluvium consistent with floodplain benches (Figure 9).

The climate of the flight path alternative site is identical to that of the proposed Project site.



6.2 Plant Communities and Wildlife Habitats

Healthcare Facility Replacement Project

On June 10, 2021, Sequoia staff conducted a survey of the Project site and characterized the vegetation present. During the survey, the biologists also documented plant and wildlife species observed on the Project site. Nomenclature used for plant names follows *The Jepson Manual, Second Edition* (Baldwin et al. 2012), while nomenclature used for wildlife follows CDFW's *Complete list of amphibian, reptile, bird, and mammal species in California* (2016).

6.2.1.1 Jeffrey Pine Forest and Woodland Alliance

The Project site is dominated by a young stand of assumed planted Jeffrey pines (*Pinus jeffryi*) managed by a local timber company. The habitat meets the criteria for Jeffrey Pine Forest and Woodland Alliance, but it is a semi-natural stand, as it appears to be a plantation with relatively uniform species composition and age. Jeffrey pines dominate the Project area and are accompanied by a shrubby and herbaceous understory, consisting of Sierra gooseberry (*Ribes montigenum*), big sagebrush (*Artemisia tridentata*), tarragon (*Artemisia dracunculoides*), dwarf lupine (*Lupinus lapidicola*), yellow rabbitbrush (*Chrysothamnus viscidiflorus* ssp. *puberulus*), pinewoods horkelia (*Horkelia fusca*), silverleaf phacelia (*Phacelia hastata*), California helianthella (*Helianthella californica*), woolly mule's ears (*Wyethia mollis*), and Oregon grape (*Berberis aquifolium*).

Common wildlife species observed within ruderal communities on the Project site include American robin (*Turdus migratorius*), Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemalis*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), downy woodpecker (*Picoides oubescens*), mountain chickadee (*Poecile gambeli*), northern flicker (*Colaptes auratus*) and western fence lizard (*Sceloporus occidentalis*).

The planted Jeffrey Pine Forest and Woodland Alliance accounts for approximately 10 acres on the 11.87-acre Project site.

6.2.1.2 Riparian Woodland

Riparian woodlands are diverse habitats that support numerous plant species, including grasses, annual and perennial forbs, vines, shrubs, and trees. A variety of plants creates a complex layering of understory and overstory which in turn provides habitat to numerous wildlife species. When found within the bed, channel, or bank of any river, stream, or lake, riparian vegetation is also protected under CFGC § 1602, and the CDFW has included riparian communities in the CNDDB.

Dominant plant species observed within riparian woodland communities on the Project site include woolly sedge (*Carex pellita*), hound's-tongue (*Cynoglossum officinale*), cattails (*Typha* sp.), California mugwort (*Artemisia douglasiana*), panicked bulrush (*Scirpus microcarpus*), sweetberry honeysuckle (*Lonicera cauriana*), willows (*Salix* spp.), and black cottonwoods (*Populus trichocarpa*).



The riparian woodland community extends into the Project site to a small extent in the northwestern corner and provides habitat for special status species with potential to occur, such as nesting birds.

6.2.1.3 *Developed*

The southeastern corner of Project site is comprised of developed habitat, consisting of parking lots and the current Seneca Healthcare District facility. This area is highly disturbed and consists entirely of concrete and ornamental landscaping.

Common wildlife species observed within developed communities on the Project site include dark-eyed junco, house finch, and common raven.

The developed habitat accounts for approximately 1.86 acres on the 11.87-acre Project site.

Helipad and Flight Path Alternative

On September 30, 2022, Sequoia staff conducted a survey of the Helipad Flight Path Alternative site and characterized the vegetation present. During the survey, the biologist also documented plant and wildlife species observed on the Project site. Nomenclature used for plant names follows *The Jepson Manual, Second Edition* (Baldwin et al. 2012), while nomenclature used for wildlife follows CDFW's *Complete list of amphibian, reptile, bird, and mammal species in California* (2016).

6.2.1.4 *Jeffrey Pine Forest and Woodland Alliance*

The flight path area is dominated by a young stand of assumed planted Jeffrey pines (*Pinus jeffryi*) managed by a local timber company. The habitat meets the criteria for Jeffrey Pine Forest and Woodland Alliance, but it is a semi-natural stand, as it appears to be a plantation with relatively uniform species composition and age. Jeffrey pines dominate the Project area and are accompanied by a shrubby and herbaceous understory, consisting of Sierra gooseberry (*Ribes montigenum*), big sagebrush (*Artemisia tridentata*), tarragon (*Artemisia dracuncululus*), dwarf lupine (*Lupinus lapidicola*), yellow rabbitbrush (*Chrysothamnus viscidiflorus* ssp. *puberulus*), pinewoods horkelia (*Horkelia fusca*), silverleaf phacelia (*Phacelia hastata*), California helianthella (*Helianthella californica*), woolly mule's ears (*Wyethia mollis*), and Oregon grape (*Berberis aquifolium*).

Common wildlife species observed within ruderal communities on the Project site include American robin (*Turdus migratorius*), Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemalis*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), downy woodpecker (*Picoides oubescens*), mountain chickadee (*Poecile gambeli*), northern flicker (*Colaptes auratus*) and western fence lizard (*Sceloporus occidentalis*).

The planted Jeffrey Pine Forest and Woodland Alliance accounts for virtually all of the 5.82-acre site.

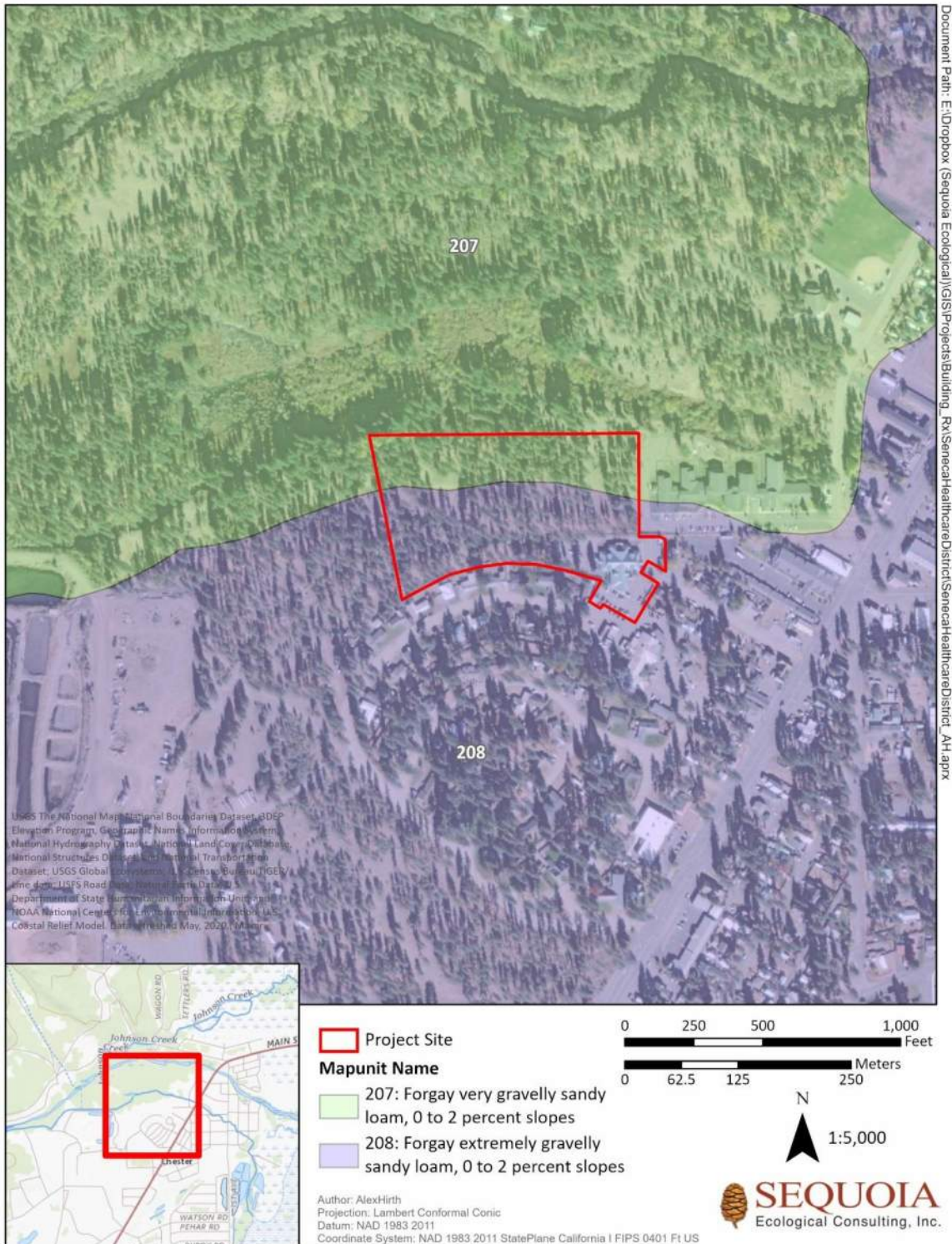


Figure 8. Soil Types on the Seneca Healthcare Facility Replacement Project Site.

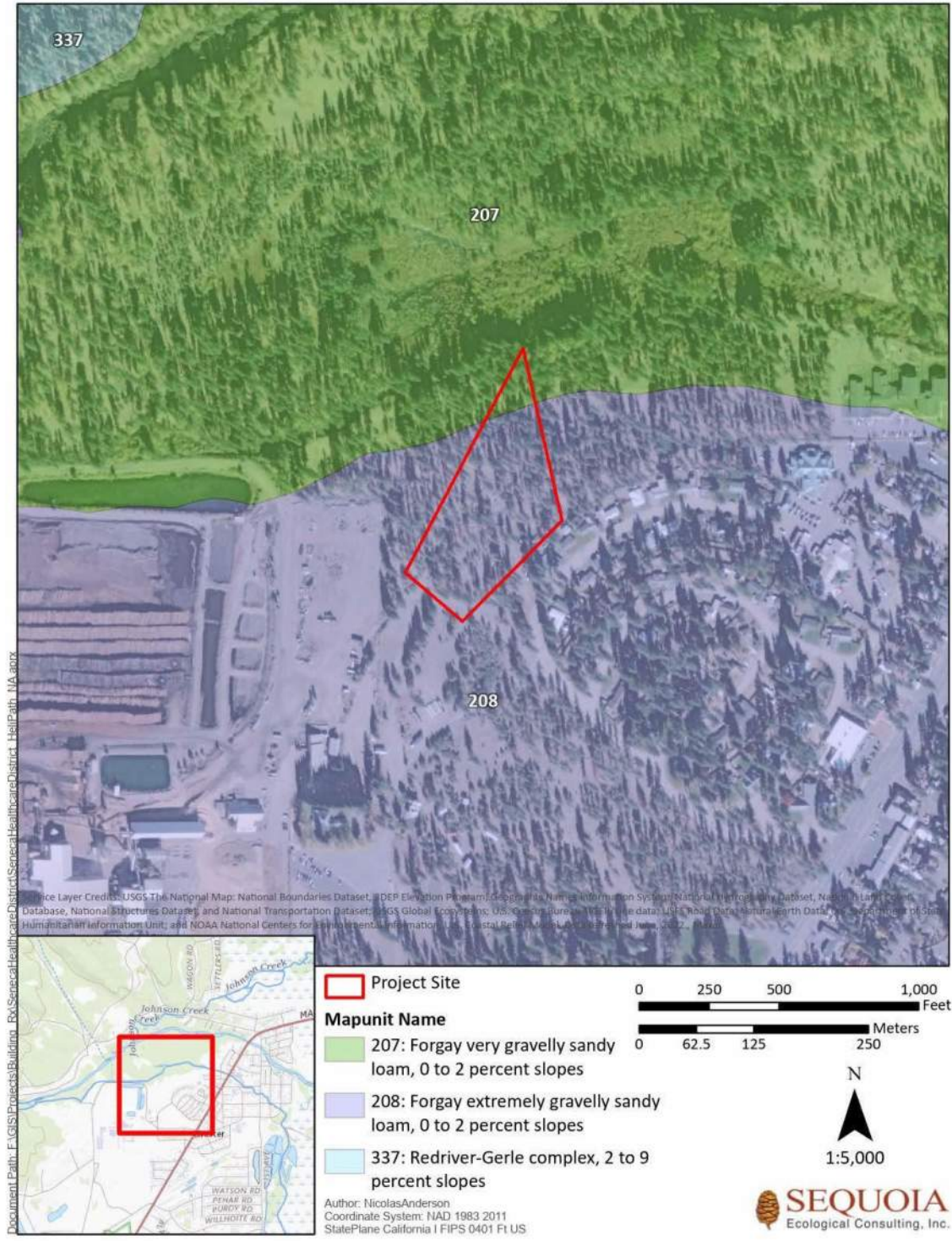


Figure 9. Soil Types on the Seneca Healthcare Facility Proposed Helicopter Approach.

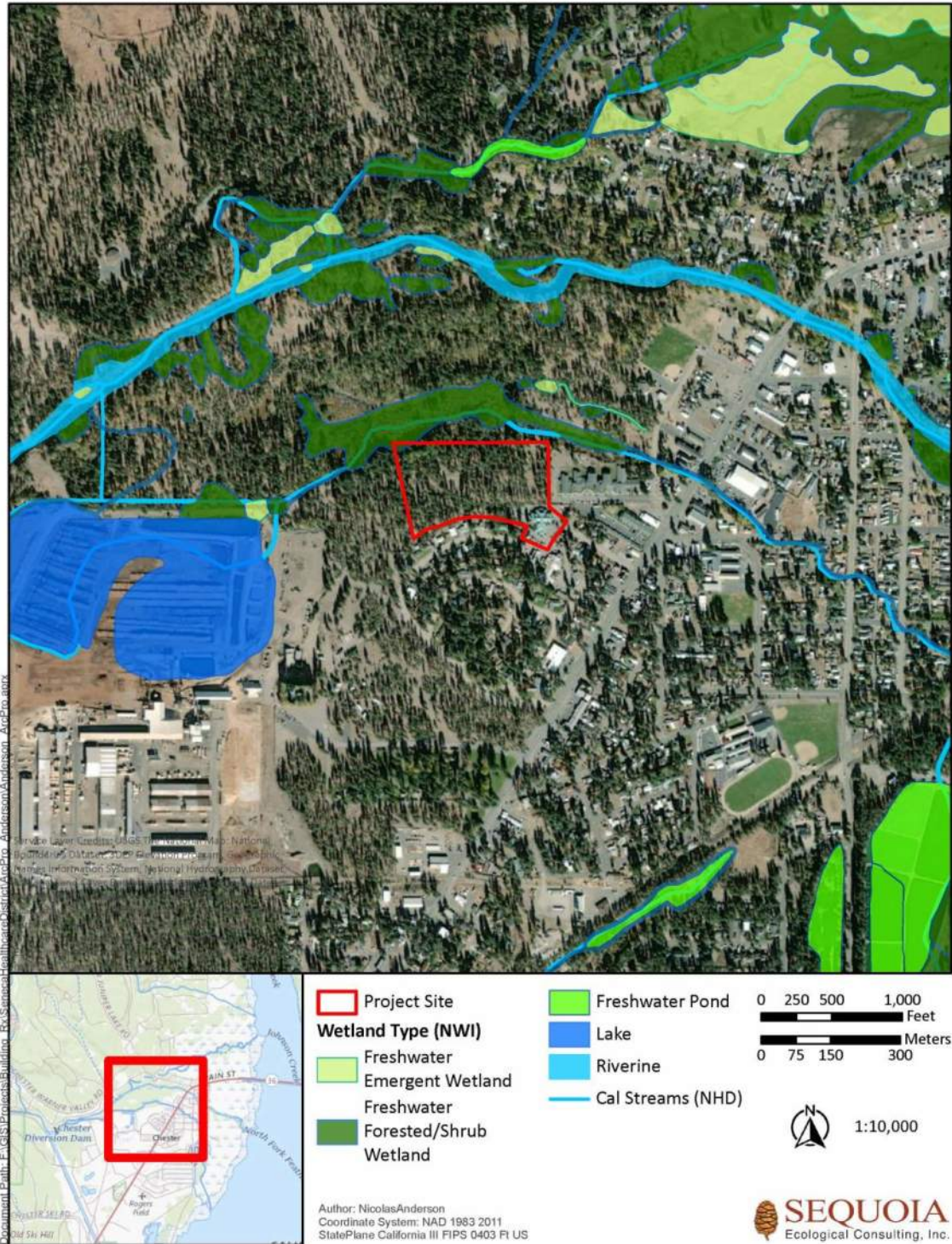


Figure 10. USFWS National Wetlands Inventory (NWI) on the Seneca Healthcare Facility Replacement Project Site.

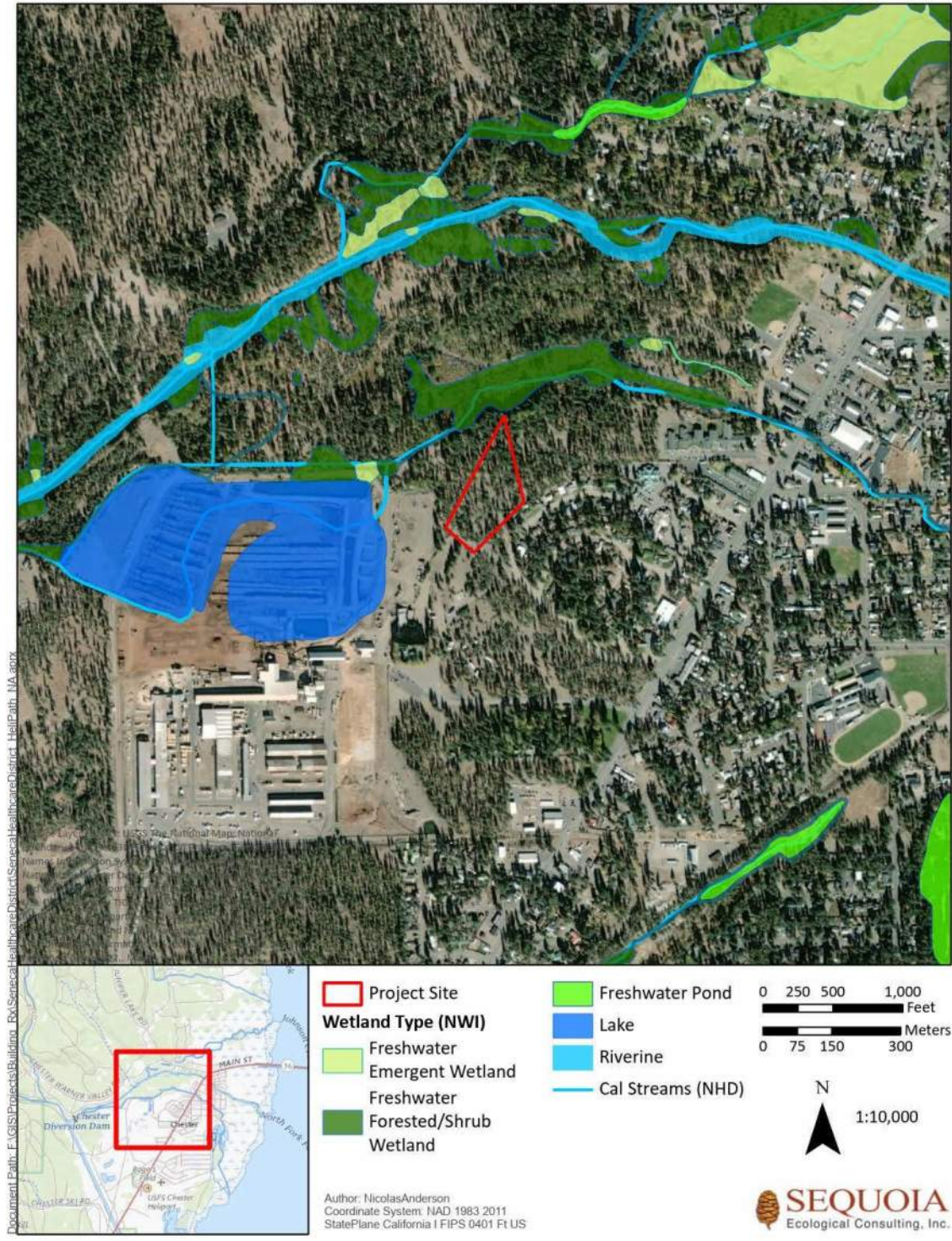


Figure 11. USFWS National Wetlands Inventory (NWI) on the Seneca Healthcare Facility Proposed Helicopter Approach.



6.2.2 *Wildlife Corridors*

Wildlife corridors are habitats that provide connectivity between natural communities otherwise separated by urbanization and other development. Wildlife corridors provide access for animals to travel between these communities for seasonal migration, access to overwintering/summering habitat, and breeding, etc. They also allow animals to move away from natural disasters and other forms of habitat loss, as well as to recolonize habitats previously extirpated. Wildlife corridors provide opportunities to breed, forage, migrate/emigrate, disperse, and forage (Beier and Loe 1992).

Healthcare Facility Replacement Project

Overall, the Project site shows signs of regular disturbance due to historic and present use for logging. Active construction may temporarily interfere with the movement of native wildlife within this wildlife corridor; however, no permanent structures or barriers to movement along the river channel will occur owing to the proposed Project. In addition, as currently planned, the proposed Project will have no adverse effects on fish movement along this river.

Helipad and Flight Path Alternative

Overall, the flight path site shows signs of regular disturbance due to historic and present use for logging and mining. Active construction may temporarily interfere with the movement of native wildlife within this wildlife corridor; however, no permanent structures or barriers to movement will occur as the result of the proposed Project.

6.2.3 *Special-Status Plants*

Healthcare Facility Replacement Project

Figure 12 provides a graphical illustration of special-status plant species occurrences within 3 miles of the Project site. Table 1 provides an assessment of special-status plant species' potential to occur on the Project site. Thirty-nine (39) special-status plants have been previously documented within 3 miles of the Project site; however, no special-status plants have been observed or mapped there. Sequoia analyzed the potential to occur for these plant species, as well as species included in CNPS and IPaC resource lists during the desktop review. A number of these species require specialized habitats such as natural upper and lower montane coniferous forests, chaparral, scrub, meadows, seeps, vernal pools, bogs and fens, and marshes and swamps that are not found on the Project site. Due to anthropogenic disturbance, lack of suitable habitat and soil types, and/or lack of known/recent occurrences in the Project vicinity, none of the 39 special-status plant species are expected to occur on the Project site. However, **floristic surveys are recommended during appropriate blooming periods to prove absence.**



Helipad and Flight Path Alternative

Figure 13 provides a graphical illustration of special-status plant species occurrences within 3 miles of the flight path alternative. Table 2 provides an assessment of special-status plant species' potential to occur on the alternative site. Thirty-nine (39) special-status plants have been previously documented within 3 miles of the site; however, no special-status plants have been observed or mapped there. Sequoia analyzed the potential to occur for these plant species, as well as species included in CNPS and IPaC resource lists during the desktop review. A number of these species require specialized habitats such as natural upper and lower montane coniferous forests, chaparral, scrub, meadows, seeps, vernal pools, bogs and fens, and marshes and swamps that are not found on the Project site. Due to anthropogenic disturbance, lack of suitable habitat and soil types, and/or lack of known/recent occurrences in the Project vicinity, none of the 39 special-status plant species are expected to occur on the Project site. However, **floristic surveys are recommended during appropriate blooming periods to prove absence.**

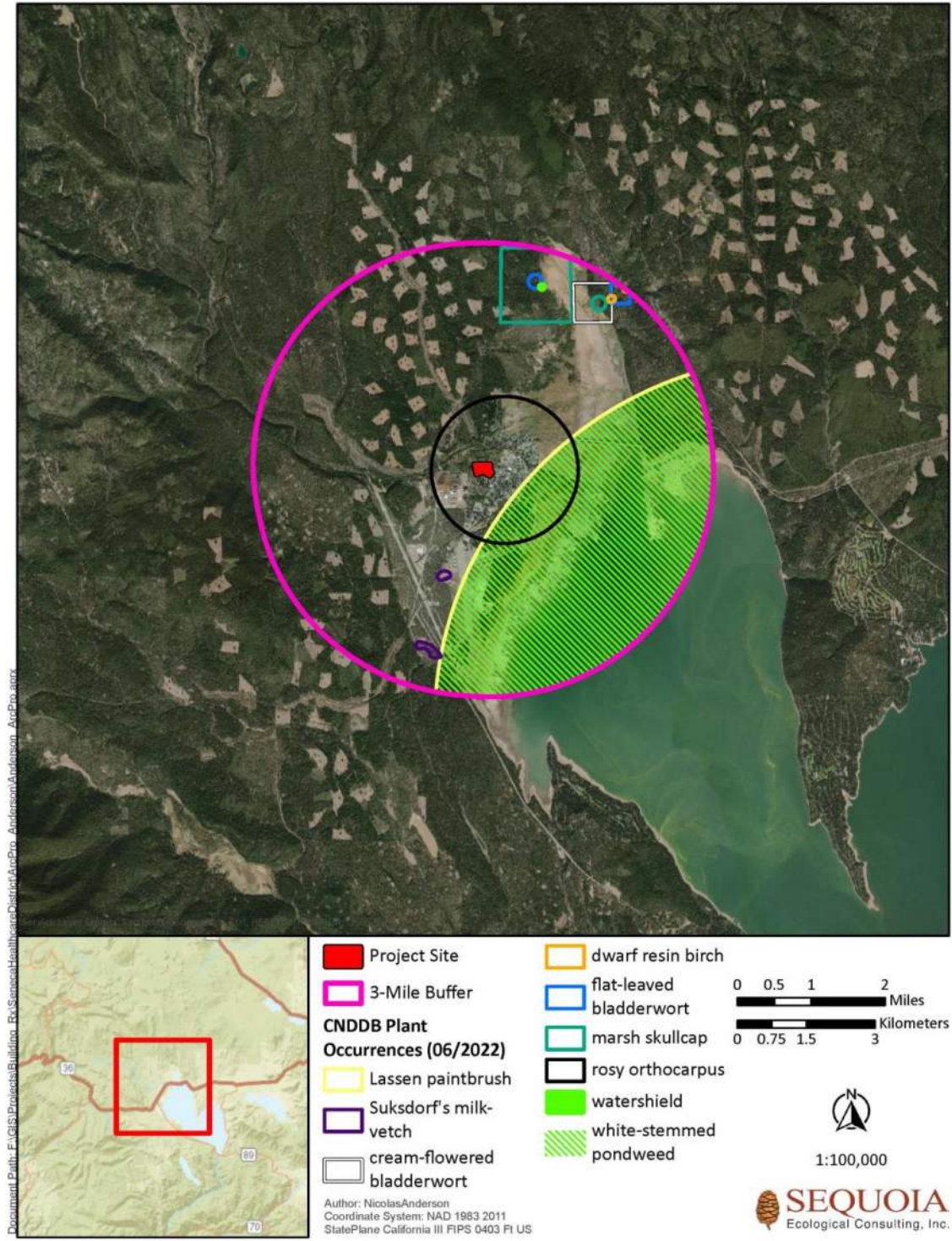


Figure 12. Closest Known Records for Special-Status Plant Species Within 3 Miles of the Seneca Healthcare Facility Replacement Project Site.

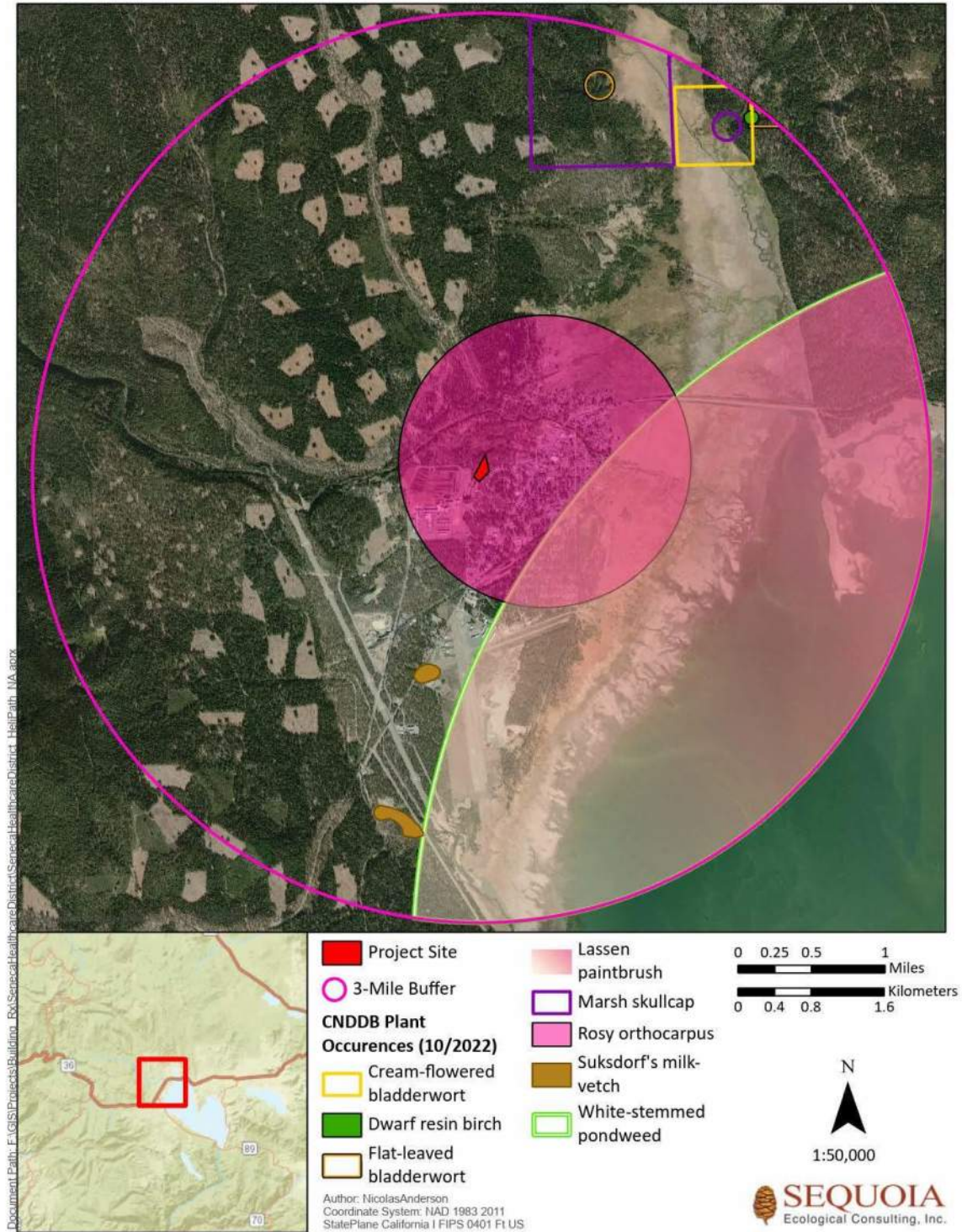


Figure 13. Closest Known Records for Special-Status Plant Species Within 3 Miles of the Seneca Healthcare Facility Proposed Helicopter Approach.



Table 1. Special-Status Plant Species with Potential to Occur on the Seneca Healthcare Facility Replacement Project Site.

| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|-------------------------------------------------------|-----------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <i>Boechnera constancei</i> | Constance's rockcress | 1B.1 | Occurs in chaparral and lower and upper montane coniferous forests at elevations of 3,200 to 6,645 feet MSL. Blooms from May through July. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Eriogonum spectabile</i> | Barron's buckwheat | 1B.1 | Occurs in upper montane coniferous forest at elevations of 6,595 to 6,725 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. |
| <i>Orcuttia tenuis</i> | slender Orcutt grass | 1B.1, FT, CE | Occurs in vernal pools at elevations of 115 to 5,775 feet. Blooms from May through October. | None. No suitable habitat occurs on the Project site. |
| <i>Astragalus pulsiferae</i> var. <i>suksdorfii</i> | Suksdorf's milk-vetch | 1B.2 | Occurs in Great Basin scrub, lower montane coniferous forest, and in pinyon and juniper woodland at elevations of 4,265 to 6,560 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |
| <i>Oreostemma elatum</i> | tall alpine-aster | 1B.2 | Occurs in bogs and fens, meadows and seeps, and upper montane coniferous forests at elevations of 3,295 to 6,890 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Penstemon personatus</i> | closed-throated beardtongue | 1B.2 | Occurs in chaparral and in lower and upper montane coniferous forests at elevations of 3,495 to 6,955 feet MSL. Blooms from June through October. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Pyrocoma lucida</i> | sticky pyrrocoma | 1B.2 | Occurs in great basin scrub, lower montane coniferous forest, and in meadows and seeps at elevations of 2,295 to 6,400 feet MSL. Blooms from July through October. | None. No suitable habitat occurs on the Project site. |
| <i>Sedum albomarginatum</i> | Feather River stonecrop | 1B.2 | Occurs in chaparral and lower montane coniferous forest at elevations of 885 to 6,400 feet MSL. Blooms from May through June. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Silene occidentalis</i> ssp. <i>longistipitata</i> | long-stiped campion | 1B.2 | Occurs in chaparral and lower and upper coniferous forests at elevations of 3,280 to 6,560 feet MSL. Blooms from June through August. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Carex davyi</i> | Davy's sedge | 1B.3 | Occurs in subalpine coniferous forest and upper montane coniferous forests at elevations of 4,920 to 10,500 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------------------------|------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <i>Castilleja lassenensis</i> | Lassen paintbrush | 1B.3 | Occurs in meadows and seeps, and in subalpine coniferous forests at elevations of 3,135 to 10,235 feet. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Erigeron lassenianus</i> var. <i>deficiens</i> | Plumas rayless daisy | 1B.3 | Occurs in lower montane coniferous forests at elevations of 4,460 to 6,495 feet MSL. Blooms from June through September. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Botrychium montanum</i> | western goblin | 2B.1 | Occurs in lower and upper montane coniferous forest, and in meadows and seeps at elevations of 4,805 to 7,155 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Scheuchzeria palustris</i> | American scheuchzeria | 2B.1 | Occurs in bogs and fens, and in marshes and swamps at elevations of 4,495 to 6,560 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Betula glandulosa</i> | dwarf resin birch | 2B.2 | Occurs in bogs and fens, lower montane coniferous forest, marshes and swamps, meadows and seeps, and in subalpine coniferous forest at elevations of 4,265 to 7,545 feet MSL. Blooms from May through July. | None. Only marginally suitable habitat occurs on the Project site, and Project site is out of range of elevation for species. |
| <i>Botrychium crenulatum</i> | scalloped moonwort | 2B.2 | Occurs in bogs and fens, lower montane coniferous forest, marshes and swamps, meadows and seeps, and in upper montane coniferous forests at elevations of 4,160 to 10,760 feet MSL. Blooms from June through September. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Botrychium minganense</i> | Mingan moonwort | 2B.2 | Occurs in bogs and fens, lower and upper montane coniferous forest, and in meadows and seeps at elevations of 4,775 to 7,155 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Carex limosa</i> | mud sedge | 2B.2 | Occurs in bogs and fens, lower and upper montane coniferous forest, marshes and swamps, and in meadows and seeps at elevations of 3,935 to 8,860 feet MSL. Blooms from June through August. | Unlikely. Project site can be considered lower montane coniferous forest; however, marshes, swamps, meadows, and seeps are absent. |
| <i>Meesia uliginosa</i> | broad-nerved hump moss | 2B.2 | Occurs in bogs and fens, meadows and seeps, subalpine coniferous forest, and in upper montane coniferous forest at elevations of 3,970 to 9,200 feet MSL. Blooms from July through October. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------|----------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Orthocarpus bracteosus</i> | rosy orthocarpus | 2B.2 | Occurs in meadows and seeps at elevations of 3,380 to 6,070 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Rhamnus alnifolia</i> | alder buckthorn | 2B.2 | Occurs in lower and upper montane coniferous forest, meadows and seeps, and in riparian scrub at elevations of 4,495 to 6,990 feet MSL. Blooms from May through July. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Rhynchospora alba</i> | white beaked-rush | 2B.2 | Occurs in bogs and fens, marshes and swamps, and meadows and seeps at elevations of 195 to 6,695 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Scutellaria galericulata</i> | marsh skullcap | 2B.2 | Occurs in lower montane coniferous forest, marshes and swamps, and in meadows and seeps at elevations of 0 to 6,890 feet MSL. Blooms from June through September. | Unlikely. Project site can be considered lower montane coniferous forest; however, meadows and seeps are absent. |
| <i>Stellaria longifolia</i> | long-leaved starwort | 2B.2 | Occurs in bogs and fens, meadows and seeps, riparian woodland, and in upper montane coniferous forest at elevations of 2,955 to 6,005 feet MSL. Blooms from May through August. | Unlikely. Marginally suitable habitat occurs at the northwest corner of the Project site, but no individuals of this species were observed. |
| <i>Utricularia intermedia</i> | flat-leaved bladderwort | 2B.2 | Occurs in bogs and fens, marshes and swamps, meadows and seeps, and in vernal pools at elevations of 3,935 to 8,860 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Utricularia ochroleuca</i> | cream-flowered bladderwort | 2B.2 | Occurs in marshes and swamps, and in meadows and seeps at elevations of 4,710 to 4,725 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Botrychium ascendens</i> | upswept moonwort | 2B.3 | Occurs in lower montane coniferous forest, and in meadows and seeps at elevations of 3,660 to 9,990 feet MSL. Blooms from June to August. | Unlikely. No meadows or seeps occur on the Project site. |
| <i>Botrychium pinnatum</i> | northwestern moonwort | 2B.3 | Occurs in lower and upper montane coniferous forest, and in meadows and seeps at elevations of 5,805 to 6,695 feet MSL. Blooms from July to October. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Brasenia schreberi</i> | watershield | 2B.3 | Occurs in marshes and swamps at elevations of 0 to 7,220 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Carex lasiocarpa</i> | woolly-fruited sedge | 2B.3 | Occurs in bogs and fens, and marshes and swamps at elevations of 5,580 to 6,890 feet MSL. Blooms from June through July. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|--------------------------------------------------------|-------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| <i>Carex petasata</i> | Liddon's sedge | 2B.3 | Occurs in broad-leaved upland forest, lower montane coniferous forest, meadows and seeps, and pinyon and juniper woodland at elevations of 1,970 to 10,895 feet MSL. Blooms from May through July. | None. No suitable habitat occurs on the Project site. |
| <i>Drosera anglica</i> | English sundew | 2B.3 | Occurs in bogs and fens, and meadows and seeps at elevations of 4,265 to 7,400 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Epilobium palustre</i> | marsh willowherb | 2B.3 | Occurs in bogs and fens, and in meadows and seeps at an elevation range of 6,400-7,875 feet MSL. Blooms July to August. | None. No suitable habitat occurs on the Project site. |
| <i>Erigeron nivalis</i> | snow fleabane daisy | 2B.3 | Occurs in alpine boulder and rock fields, meadows and seeps, and subalpine coniferous forest at elevations of 5,695 to 9,515 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Eriogonum pyrolifolium</i> var. <i>pyrolifolium</i> | pyrola-leaved buckwheat | 2B.3 | Occurs in alpine boulder and rock fields at elevations of 5,495 to 10,500 feet MSL. Blooms from July through September. | None. No suitable habitat occurs on the Project site. |
| <i>Juncus dudleyi</i> | Dudley's rush | 2B.3 | Occurs in lower montane coniferous forests at elevations of 1,495 to 6,560 feet MSL. Blooms from July through August. | Moderate. Habitat on-site could be classified as lower montane coniferous forest and falls within the elevation range. |
| <i>Lysimachia thyrsoiflora</i> | tufted loosestrife | 2B.3 | Occurs in marshes and swamps, meadows and seeps, and in upper montane coniferous forest at elevations of 3,200 to 5,495 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |
| <i>Potamogeton praelongus</i> | white-stemmed pondweed | 2B.3 | Occurs in marshes and swamps at elevations of 5,905 to 9,845 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Schoenoplectus subterminalis</i> | water bulrush | 2B.3 | Occurs in bogs and fens, and in marshes and swamps at elevations of 2,460 to 7,380 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |

Key to status:

FT=Federally listed as threatened species

CE=California listed as endangered species

CR=California rare

CNPS Rare Plant Rank

1A=Plants presumed extirpated in California, and either rare or extinct elsewhere

1B=Plants rare, threatened, or endangered in California, or elsewhere

2A=Plants presumed extirpated in California but common elsewhere

2B=Plants rare, threatened, or endangered in California but more common elsewhere



Table 2. Special-Status Plant Species with Potential to Occur on the Collins Pines Proposed Flight Path.

| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|-------------------------------------------------------|-----------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| <i>Boechea constancei</i> | Constance's rockcress | 1B.1 | Occurs in chaparral and lower and upper montane coniferous forests at elevations of 3,200 to 6,645 feet MSL. Blooms from May through July. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Eriogonum spectabile</i> | Barron's buckwheat | 1B.1 | Occurs in upper montane coniferous forest at elevations of 6,595 to 6,725 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. |
| <i>Orcuttia tenuis</i> | slender Orcutt grass | 1B.1, FT, CE | Occurs in vernal pools at elevations of 115 to 5,775 feet. Blooms from May through October. | None. No suitable habitat occurs on the Project site. |
| <i>Astragalus pulsiferae</i> var. <i>suksdorfii</i> | Suksdorf's milk-vetch | 1B.2 | Occurs in Great Basin scrub, lower montane coniferous forest, and in pinyon and juniper woodland at elevations of 4,265 to 6,560 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |
| <i>Oreostemma elatum</i> | tall alpine-aster | 1B.2 | Occurs in bogs and fens, meadows and seeps, and upper montane coniferous forests at elevations of 3,295 to 6,890 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Penstemon personatus</i> | closed-throated beardtongue | 1B.2 | Occurs in chaparral and in lower and upper montane coniferous forests at elevations of 3,495 to 6,955 feet MSL. Blooms from June through October. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Pyrrocomma lucida</i> | sticky pyrrocoma | 1B.2 | Occurs in great basin scrub, lower montane coniferous forest, and in meadows and seeps at elevations of 2,295 to 6,400 feet MSL. Blooms from July through October. | None. No suitable habitat occurs on the Project site. |
| <i>Sedum albomarginatum</i> | Feather River stonecrop | 1B.2 | Occurs in chaparral and lower montane coniferous forest at elevations of 885 to 6,400 feet MSL. Blooms from May through June. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Silene occidentalis</i> ssp. <i>longistipitata</i> | long-stiped campion | 1B.2 | Occurs in chaparral and lower and upper coniferous forests at elevations of 3,280 to 6,560 feet MSL. Blooms from June through August. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Carex davyi</i> | Davy's sedge | 1B.3 | Occurs in subalpine coniferous forest and upper montane coniferous forests at elevations of 4,920 to 10,500 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------------------------|------------------------|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <i>Castilleja lassenensis</i> | Lassen paintbrush | 1B.3 | Occurs in meadows and seeps, and in subalpine coniferous forests at elevations of 3,135 to 10,235 feet. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Erigeron lassenianus</i> var. <i>deficiens</i> | Plumas rayless daisy | 1B.3 | Occurs in lower montane coniferous forests at elevations of 4,460 to 6,495 feet MSL. Blooms from June through September. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Botrychium montanum</i> | western goblin | 2B.1 | Occurs in lower and upper montane coniferous forest, and in meadows and seeps at elevations of 4,805 to 7,155 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Scheuchzeria palustris</i> | American scheuchzeria | 2B.1 | Occurs in bogs and fens, and in marshes and swamps at elevations of 4,495 to 6,560 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Betula glandulosa</i> | dwarf resin birch | 2B.2 | Occurs in bogs and fens, lower montane coniferous forest, marshes and swamps, meadows and seeps, and in subalpine coniferous forest at elevations of 4,265 to 7,545 feet MSL. Blooms from May through July. | None. Only marginally suitable habitat occurs on the Project site, and Project site is out of range of elevation for species. |
| <i>Botrychium crenulatum</i> | scalloped moonwort | 2B.2 | Occurs in bogs and fens, lower montane coniferous forest, marshes and swamps, meadows and seeps, and in upper montane coniferous forests at elevations of 4,160 to 10,760 feet MSL. Blooms from June through September. | Unlikely. Only marginally suitable habitat occurs on the Project site. |
| <i>Botrychium minganense</i> | Mingan moonwort | 2B.2 | Occurs in bogs and fens, lower and upper montane coniferous forest, and in meadows and seeps at elevations of 4,775 to 7,155 feet MSL. Blooms from July to September. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Carex limosa</i> | mud sedge | 2B.2 | Occurs in bogs and fens, lower and upper montane coniferous forest, marshes and swamps, and in meadows and seeps at elevations of 3,935 to 8,860 feet MSL. Blooms from June through August. | Unlikely. Project site can be considered lower montane coniferous forest; however, marshes, swamps, meadows, and seeps are absent. |
| <i>Meesia uliginosa</i> | broad-nerved hump moss | 2B.2 | Occurs in bogs and fens, meadows and seeps, subalpine coniferous forest, and in upper montane coniferous forest at elevations of 3,970 to 9,200 feet MSL. Blooms from July through October. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------|----------------------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Orthocarpus bracteosus</i> | rosy orthocarpus | 2B.2 | Occurs in meadows and seeps at elevations of 3,380 to 6,070 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Rhamnus alnifolia</i> | alder buckthorn | 2B.2 | Occurs in lower and upper montane coniferous forest, meadows and seeps, and in riparian scrub at elevations of 4,495 to 6,990 feet MSL. Blooms from May through July. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Rhynchospora alba</i> | white beaked-rush | 2B.2 | Occurs in bogs and fens, marshes and swamps, and meadows and seeps at elevations of 195 to 6,695 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Scutellaria galericulata</i> | marsh skullcap | 2B.2 | Occurs in lower montane coniferous forest, marshes and swamps, and in meadows and seeps at elevations of 0 to 6,890 feet MSL. Blooms from June through September. | Unlikely. Project site can be considered lower montane coniferous forest; however, meadows and seeps are absent. |
| <i>Stellaria longifolia</i> | long-leaved starwort | 2B.2 | Occurs in bogs and fens, meadows and seeps, riparian woodland, and in upper montane coniferous forest at elevations of 2,955 to 6,005 feet MSL. Blooms from May through August. | Unlikely. Marginally suitable habitat occurs at the northwest corner of the Project site, but no individuals of this species were observed. |
| <i>Utricularia intermedia</i> | flat-leaved bladderwort | 2B.2 | Occurs in bogs and fens, marshes and swamps, meadows and seeps, and in vernal pools at elevations of 3,935 to 8,860 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Utricularia ochroleuca</i> | cream-flowered bladderwort | 2B.2 | Occurs in marshes and swamps, and in meadows and seeps at elevations of 4,710 to 4,725 feet MSL. Blooms from June through August. | None. No suitable habitat occurs on the Project site. |
| <i>Botrychium ascendens</i> | upswept moonwort | 2B.3 | Occurs in lower montane coniferous forest, and in meadows and seeps at elevations of 3,660 to 9,990 feet MSL. Blooms from June to August. | Unlikely. No meadows or seeps occur on the Project site. |
| <i>Botrychium pinnatum</i> | northwestern moonwort | 2B.3 | Occurs in lower and upper montane coniferous forest, and in meadows and seeps at elevations of 5,805 to 6,695 feet MSL. Blooms from July to October. | None. No suitable habitat occurs on the Project site. Project site is out of elevation range for species. |
| <i>Brasenia schreberi</i> | watershield | 2B.3 | Occurs in marshes and swamps at elevations of 0 to 7,220 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Carex lasiocarpa</i> | woolly-fruited sedge | 2B.3 | Occurs in bogs and fens, and marshes and swamps at elevations of 5,580 to 6,890 feet MSL. Blooms from June through July. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|--------------------------------------------------------|-------------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| <i>Carex petasata</i> | Liddon's sedge | 2B.3 | Occurs in broad-leaved upland forest, lower montane coniferous forest, meadows and seeps, and pinyon and juniper woodland at elevations of 1,970 to 10,895 feet MSL. Blooms from May through July. | None. No suitable habitat occurs on the Project site. |
| <i>Drosera anglica</i> | English sundew | 2B.3 | Occurs in bogs and fens, and meadows and seeps at elevations of 4,265 to 7,400 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |
| <i>Epilobium palustre</i> | marsh willowherb | 2B.3 | Occurs in bogs and fens, and in meadows and seeps at an elevation range of 6,400-7,875 feet MSL. Blooms July to August. | None. No suitable habitat occurs on the Project site. |
| <i>Erigeron nivalis</i> | snow fleabane daisy | 2B.3 | Occurs in alpine boulder and rock fields, meadows and seeps, and subalpine coniferous forest at elevations of 5,695 to 9,515 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Eriogonum pyrolifolium</i> var. <i>pyrolifolium</i> | pyrola-leaved buckwheat | 2B.3 | Occurs in alpine boulder and rock fields at elevations of 5,495 to 10,500 feet MSL. Blooms from July through September. | None. No suitable habitat occurs on the Project site. |
| <i>Juncus dudleyi</i> | Dudley's rush | 2B.3 | Occurs in lower montane coniferous forests at elevations of 1,495 to 6,560 feet MSL. Blooms from July through August. | Moderate. Habitat on-site could be classified as lower montane coniferous forest and falls within the elevation range. |
| <i>Lysimachia thyrsoiflora</i> | tufted loosestrife | 2B.3 | Occurs in marshes and swamps, meadows and seeps, and in upper montane coniferous forest at elevations of 3,200 to 5,495 feet MSL. Blooms from May through August. | None. No suitable habitat occurs on the Project site. |
| <i>Potamogeton praelongus</i> | white-stemmed pondweed | 2B.3 | Occurs in marshes and swamps at elevations of 5,905 to 9,845 feet MSL. Blooms from July through August. | None. No suitable habitat occurs on the Project site. |
| <i>Schoenoplectus subterminalis</i> | water bulrush | 2B.3 | Occurs in bogs and fens, and in marshes and swamps at elevations of 2,460 to 7,380 feet MSL. Blooms from June through September. | None. No suitable habitat occurs on the Project site. |

Key to status:

FT=Federally listed as threatened species
 CE=California listed as endangered species
 CR=California rare
 CNPS Rare Plant Rank

1A=Plants presumed extirpated in California, and either rare or extinct elsewhere
 1B=Plants rare, threatened, or endangered in California, or elsewhere
 2A=Plants presumed extirpated in California but common elsewhere



2B=Plants rare, threatened, or endangered in California but more common elsewhere

Note: CNPS ranks 3 and 4 were excluded from this analysis.

6.2.4 Special-Status Wildlife

Healthcare Facility Replacement Project

Figure 14 provides a graphical illustration of special-status wildlife species occurrences within 3 miles of the Project site. Table 3 provides an assessment of potential to occur for special-status wildlife species on the Project site. Twelve (12) special-status wildlife species have been previously documented (CNDDDB occurrences) within 3 miles. Sequoia analyzed the potential to occur for these wildlife species, as well as species included in Calfish, Pisces, NMFS, and IPaC resource lists during the desktop review. A number of these species require specialized habitat such as lakes, pools, ponds, meadows, grassland, and older growth forests that are not found on the Project site. Due to lack of suitable habitat and/or lack of recent occurrences in the Project vicinity, ten (10) special-status wildlife species are not expected to occur and are therefore not discussed further in this analysis. These ten (10) species are: Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, California red-legged frog (*Rana draytonii*), Cascades frog, delta smelt (*Hypomesus transpacificus*), western bumblebee (*Bombus occidentalis*), and obscure bumblebee (*Bombus caliginosus*). Descriptions and potential for occurrence of the remaining two (2) special-status wildlife species, bald eagle and osprey, are provided in more detail below.

Helipad and Flight Path Alternative

Figure 15 provides a graphical illustration of special-status wildlife species occurrences within 3 miles of the Helipad Flight Path Alternative site. Table 4 provides an assessment of potential to occur for special-status wildlife species on the site. Eleven (11) special-status wildlife species have been previously documented (CNDDDB occurrences) within 3 miles. Sequoia analyzed the potential to occur for these wildlife species, as well as species included in Calfish, Pisces, NMFS, and IPaC resource lists during the desktop review. A number of these species require specialized habitat such as lakes, pools, ponds, meadows, grassland, and older growth forests that are not found on the Project site. Due to lack of suitable habitat and/or lack of recent occurrences in the Project vicinity, nine (9) special-status wildlife species are not expected to occur and are therefore not discussed further in this analysis. These ten (10) species are: Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, Cascades frog, delta smelt (*Hypomesus transpacificus*), western bumblebee (*Bombus occidentalis*), and obscure bumblebee (*Bombus caliginosus*). Descriptions and potential for occurrence of the remaining two (2) special-status wildlife species, bald eagle and osprey, are provided in more detail below.



6.2.4.1 Bald Eagle

The bald eagle (nesting and nonbreeding/wintering) was delisted from the federal Endangered Species Act on August 8, 2007, in the lower 48 states (72 FR 37345). Effective May 1, 2008, the Sonoran Desert area of central Arizona (Sonoran Desert DPS) was federally listed as threatened. This DPS covers: (1) Yavapai in northern Mexico; Gila, Graham, Pinal, and Maricopa counties in Arizona; and (2) Southern Mohave County (that portion south and east of the center of Interstate Highway 40 and east of Arizona Highway 95), eastern LaPaz County (that portion east of the centerline of U.S. and Arizona Highways 95), and north of the centerline of Interstate Highway 8) (73 FR 23966). The bald eagle is state listed as endangered and designated as fully protected by CFGC § 3511 (CDFW 2018). Bald eagles are also protected under the Migratory Bird Treaty Act (16 U.S.C. 703-712; MBTA), the Migratory Bird Treaty Reform Act (Division E, Title I, § 143 of the Consolidated Appropriations Act, 2005, PL 108-447; MBTRA), and the Bald Eagle Protection Act (16 U.S.C. 668-668d, 54 Stat. 250).

Bald eagles inhabit forested areas adjacent to large bodies of water, including lakes, reservoirs, rivers, estuaries, and the coastline (Buehler 2000). They are opportunistic and will feed on carrion, but actively prey on a variety of fish, mammals, and birds (Buehler 2000). Breeding begins in early spring in the north and are single-brooded (Baicich and Harrison 2005). Nests are built from sticks and branches in a large tree or a rocky outcrop; bald eagles have also been known to nest on the ground on islands (Baicich and Harrison 2005). Bald eagles winter in temperate areas typically below 1,640 feet in elevation (Baicich and Harrison 2005) throughout California. Roost sites are often located in large conifers in the west near aquatic foraging areas (Baicich and Harrison 2005). Most breeding territories for bald eagles are in northern California, mainly in mountain and foothill forests and woodlands near reservoirs, lakes, and rivers. Bald eagles have also been observed to nest in scattered locations in the central and southern Sierra Nevada mountains and foothills, in several locations from the central Coast Range to inland southern California, and on Santa Catalina Island.

Healthcare Facility Replacement Project

The Project site comprises a younger stand of Jeffrey pine with tree sizes only marginally suitable for bald eagle nesting. According to the CNDDDB, there was an occurrence within approximately 0.5 miles of the Project area, but no nest was observed in the vicinity of this occurrence during the June 3, 2022 surveys. With the implementation of a nesting bird survey directly prior to work, **no impacts to bald eagle are anticipated from the proposed Project.**

Helipad and Flight Path Alternative

The Helipad Flight Path Alternative site comprises a younger stand of Jeffrey pine with tree sizes only marginally suitable for bald eagle nesting. According to the CNDDDB, there was an occurrence within approximately 0.5 miles of the Project area, but no nest was observed in the vicinity of this occurrence during the September 30, 2022 surveys. With the implementation of a nesting bird survey directly prior to work, **no impacts to bald eagle are anticipated from the proposed Alternative.**



6.2.4.2 Osprey

Osprey (*Pandion haliaetus*) nest sites are considered sensitive by the CDFW. Formerly distributed throughout California, this species has declined significantly since the 1940s and is now mainly found in the northern half of the state (Remsen 1978; Roberson and Tenney 1993). Ospreys breed along the coast, in estuaries, freshwater lakes, reservoirs, and large rivers. Nesting habitat usually requires the presence of snags adjacent to or over open water. The large platform nests are built on snags and sometimes on artificial structures (e.g., poles). Ospreys feed primarily on fish (dead or alive), but rodents, birds, and other small vertebrates are also consumed (Ehrlich et al. 1988). Removal of nesting trees, pesticide contamination, and human disturbances (e.g., boating activities) have contributed to this species' decline in California (Remsen 1978).

Healthcare Facility Replacement Project

The Project site comprises a younger stand of Jeffrey pine with tree sizes only marginally suitable for osprey nesting. Osprey individuals were observed within the regional context of the Project, but no nests were observed in the vicinity of the Project area during the June 3, 2022 surveys. With the implementation of a nesting bird survey directly prior to work, **no impacts to osprey are anticipated from the proposed Project.**

Helipad and Flight Path Alternative

The Flight Path Alternative site comprises a younger stand of Jeffrey pine with tree sizes only marginally suitable for osprey nesting. Osprey individuals were observed within the regional context of the Project, but no nests were observed in the vicinity of the Project area during the September 30, 2022 surveys. With the implementation of a nesting bird survey directly prior to work, **no impacts to osprey are anticipated from the proposed Project.**

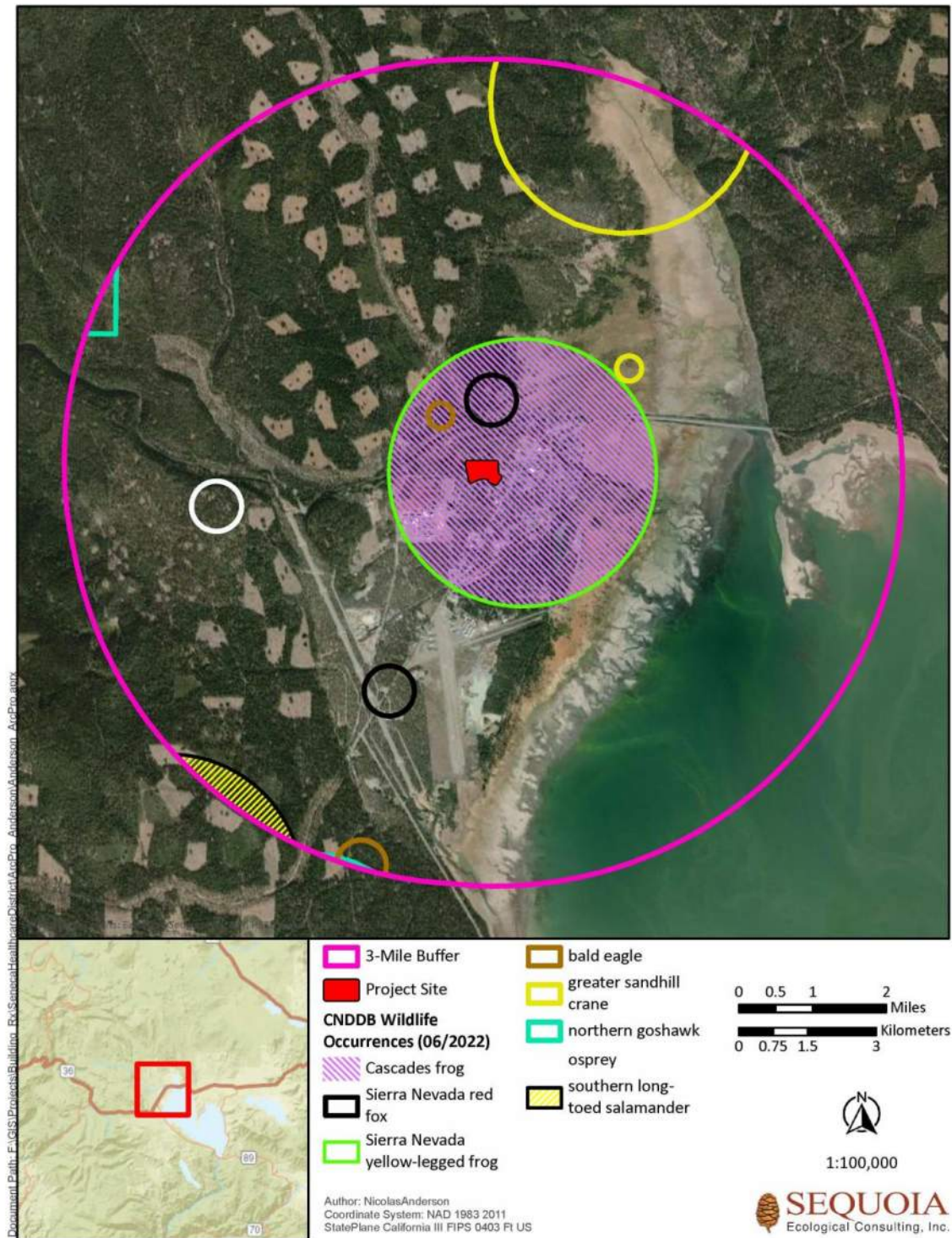


Figure 14. Closest Known Records for Special-Status Wildlife Species Within 3 Miles of the Seneca Healthcare Replacement Project Site.

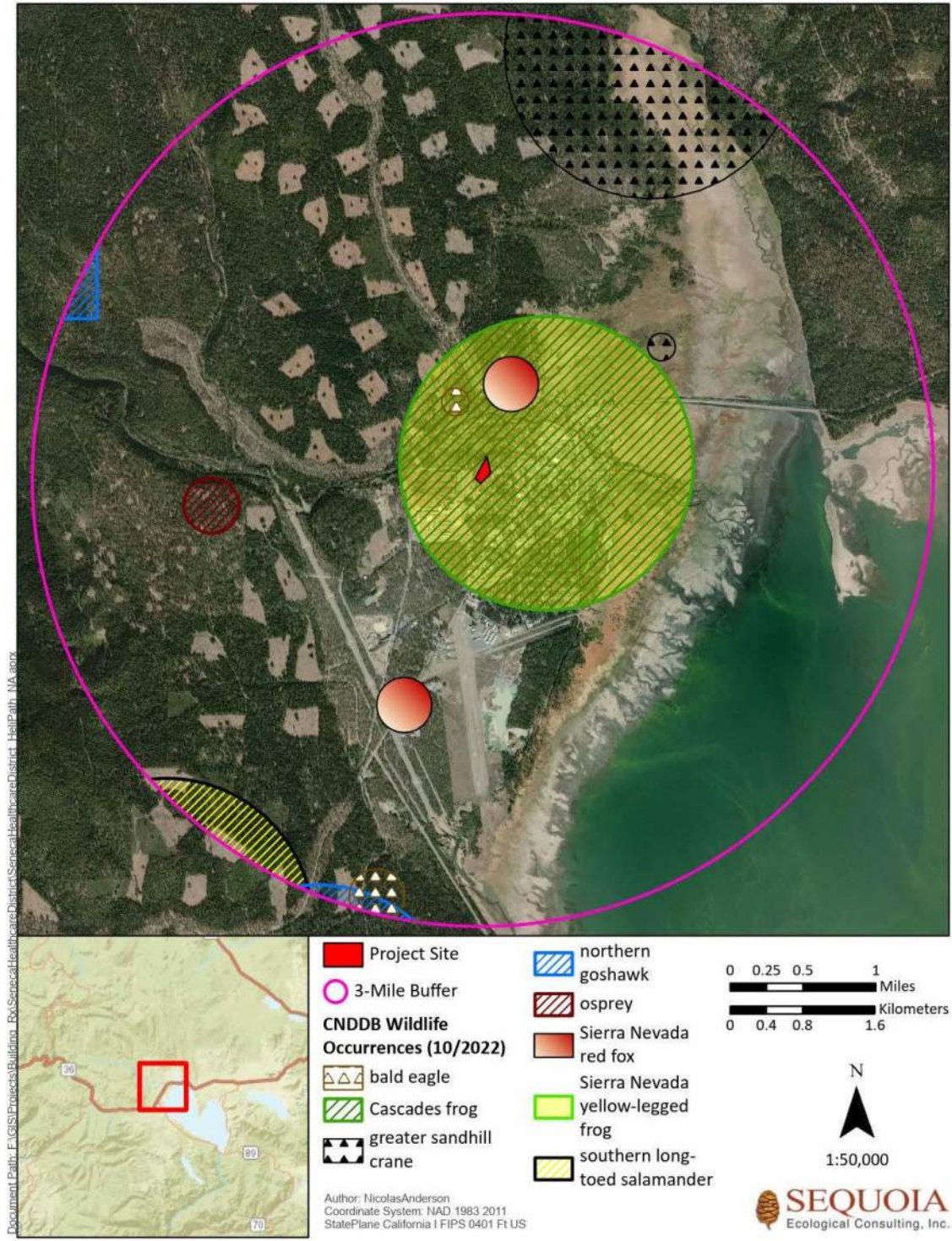


Figure 15. Closest Known Records for Special-Status Wildlife Species Within 3 Miles of the Seneca Healthcare Replacement Proposed Helicopter Approach.



Table 3. Special-Status Wildlife Species with Potential to Occur on the Seneca Healthcare Replacement Project Site.

| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|-------------------------------------------|-----------------------------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Mammals | | | | |
| <i>Vulpes vulpes necator pop. 1</i> | Sierra Nevada red fox (southern Cascades DPS) | FE (proposed), CT | Occurs in annual grasslands or open stages with scattered shrubby vegetation. Requires loose sandy textured soils for burrowing. | None. No suitable habitat occurs on the Project site. |
| Birds | | | | |
| <i>Haliaeetus leucocephalus</i> | bald eagle | CE, FP, BAGEPA | Inhabits forests adjacent to large bodies of water. Nest sites require large trees or rock outcrops. | Moderate potential. Eagle sighted on drive to Project site around 20 miles away. Marginal suitable habitat occurs on the Project site. |
| <i>Accipiter gentilis</i> | northern goshawk | SSC | Occurs in coniferous forests from 2,500 – 10,000 feet MSL. | Unlikely. No suitable habitat occurs on the Project site. |
| <i>Grus (=Antigone) canadensis tabida</i> | greater sandhill crane | CT, FP | Occurs in large wetland or dry meadow complexes. | Unlikely. No suitable habitat occurs on the Project site. |
| <i>Pandion haliaetus</i> | osprey | WL | Occurs near shallow, fish-filled waters, including rivers, lakes, lagoons, swamps, and marshes. | Moderate potential. Species sighted a couple of miles away from the Project site. |
| Amphibians/Reptiles | | | | |
| <i>Ambystoma macrodactylum sigilatum</i> | southern long-toed salamander | SSC | Occurs in alpine meadows and high mountain ponds and lakes up to 10,000 feet MSL. Found along northeast Sierra Nevada to Garner Meadows. | None. No suitable habitat occurs on the Project site. |
| <i>Rana sierrae</i> | Sierra Nevada yellow-legged frog | FE, CT | Occurs between 3,500 – 12,000 feet MSL in Sierra Nevada streams, lakes, and ponds in montane, riparian, lodgepole pine, subalpine conifer, and wet meadow habitats. Breeding habitat requires permanent lakes or ponds that do not freeze to the bottom in winter or dry out in summer. | Unlikely. No suitable breeding habitat occurs on the Project site. |
| <i>Rana draytonii</i> | California red-legged frog | FT, SSC | Occurs in semi-permanent or permanent water at least 2 feet deep, bordered by emergent or riparian vegetation, and upland grassland, forest, or scrub habitats for aestivation and dispersal. | Unlikely. No suitable breeding, over-summering, or migration/dispersal habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------|--------------------|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <i>Rana cascadae</i> | Cascades frog | CE (candidate), SSC | Occurs in lakes, ponds, wet meadows, and streams in the Cascades Range. Inhabits moderate to high elevations. | None. No suitable habitat occurs on the Project site. |
| Fishes | | | | |
| <i>Hypomesus transpacificus</i> | delta smelt | FT, CE | Endemic to Sacramento-San Joaquin Delta and its tributaries extending west to Suisun and San Pablo bays. | None. No suitable habitat occurs on the Project site. |
| Invertebrates | | | | |
| <i>Bombus occidentalis</i> | western bumble bee | SSC, CE (candidate) | Occurs in natural, agricultural, urban, and rural areas that provide suitable nesting sites, overwintering sites for the queens, and nectar and pollen resources throughout the spring, summer, and fall. | Unlikely. Marginal suitable habitat occurs on the Project site. |
| <i>Bombus caliginosus</i> | obscure bumblebee | S3 | Occurs in open, grassy, coastal prairies and Coast Range meadows. Nesting occurs underground and above ground in abandoned bird nests. | None. No suitable habitat occurs on the Project site. |
| <i>Danaus plexippus</i> | monarch butterfly | S2/S3 | Overwintering, roosting monarchs can be found on basswoods, elms, sumacs, locusts, oaks, osage-oranges, mulberries, pecans, willows, cottonwoods, and mesquites. Breeding takes place in agricultural fields, pastureland, prairie remnants, urban and suburban residential areas, gardens, trees, and roadsides – anywhere where there is access to larval host plants. | None. Out of range for overwintering habitat and no larval host plants located in the Project area. |

Key to status:

- FE=Federally listed as endangered species
- FT=Federally listed as threatened species
- FC=Federally listed as a candidate species for listing
- CE=California listed as endangered species
- CT=California listed as threatened species
- FP=California listed as fully protected
- SSC=California species of special concern
- S2 = Imperiled
- S3 = Vulnerable
- BAGEPA=Bald and Golden Eagle Protection Act
- WL=CDFW watch list



Table 4. Special-Status Wildlife Species with Potential to Occur on the Seneca Healthcare Collins Pines Proposed Flight Path.

| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|-------------------------------------------|-----------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Mammals | | | | |
| <i>Vulpes vulpes necator pop. 1</i> | Sierra Nevada red fox (southern Cascades DPS) | FE (proposed), CT | Occurs in annual grasslands or open stages with scattered shrubby vegetation. Requires loose sandy textured soils for burrowing. | None. No suitable habitat occurs on the Project site. |
| Birds | | | | |
| <i>Haliaeetus leucocephalus</i> | bald eagle | CE, FP, BAGEPA | Inhabits forests adjacent to large bodies of water. Nest sites require large trees or rock outcrops. | Moderate potential. Eagle sighted on drive to Project site around 20 miles away. Marginal suitable habitat occurs on the Project site. |
| <i>Accipiter gentilis</i> | northern goshawk | SSC | Occurs in coniferous forests from 2,500 – 10,000 feet MSL. | Unlikely. No suitable habitat occurs on the Project site. |
| <i>Grus (=Antigone) canadensis tabida</i> | greater sandhill crane | CT, FP | Occurs in large wetland or dry meadow complexes. | Unlikely. No suitable habitat occurs on the Project site. |
| <i>Pandion haliaetus</i> | osprey | WL | Occurs near shallow, fish-filled waters, including rivers, lakes, lagoons, swamps, and marshes. | Moderate potential. Species sighted a couple of miles away from the Project site. |
| Amphibians/Reptiles | | | | |
| <i>Ambystoma macrodactylum sigilatum</i> | southern long-toed salamander | SSC | Occurs in alpine meadows and high mountain ponds and lakes up to 10,000 feet MSL. Found along northeast Sierra Nevada to Garner Meadows. | None. No suitable habitat occurs on the Project site. |
| <i>Rana sierrae</i> | Sierra Nevada yellow-legged frog | FE, CT | Occurs between 3,500 – 12,000 feet MSL in Sierra Nevada streams, lakes, and ponds in montane, riparian, lodgepole pine, subalpine conifer, and wet meadow habitats. Breeding habitat requires permanent lakes or ponds that do not freeze to the bottom in winter or dry out in summer. | Unlikely. No suitable breeding habitat occurs on the Project site. |
| <i>Rana cascadae</i> | Cascades frog | CE (candidate), SSC | Occurs in lakes, ponds, wet meadows, and streams in the Cascades Range. Inhabits moderate to high elevations. | None. No suitable habitat occurs on the Project site. |



| Scientific Name | Common Name | Listed Status | Habitat Requirements | Potential for Occurrence |
|---------------------------------|--------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Fishes | | | | |
| <i>Hypomesus transpacificus</i> | delta smelt | FT, CE | Endemic to Sacramento-San Joaquin Delta and its tributaries extending west to Suisun and San Pablo bays. | None. No suitable habitat occurs on the Project site. |
| Invertebrates | | | | |
| <i>Bombus occidentalis</i> | western bumble bee | SSC, CE (candidate) | Occurs in natural, agricultural, urban, and rural areas that provide suitable nesting sites, overwintering sites for the queens, and nectar and pollen resources throughout the spring, summer, and fall. | Unlikely. Marginal suitable habitat occurs on the Project site. |
| <i>Bombus caliginosus</i> | obscure bumblebee | VU | Occurs in open, grassy, coastal prairies and Coast Range meadows. Nesting occurs underground and above ground in abandoned bird nests. | None. No suitable habitat occurs on the Project site. |
| <i>Danaus plexippus</i> | monarch butterfly | NA | Overwintering, roosting monarchs can be found on basswoods, elms, sumacs, locusts, oaks, osage-oranges, mulberries, pecans, willows, cottonwoods, and mesquites. Breeding takes place in agricultural fields, pasture land, prairie remnants, urban and suburban residential areas, gardens, trees, and roadsides – anywhere where there is access to larval host plants. | None. Out of range for overwintering habitat and no larval host plants located in the Project area. |

Key to status:

- FE=Federally listed as endangered species
- FT=Federally listed as threatened species
- FC=Federally listed as a candidate species for listing
- CE=California listed as endangered species
- CT=California listed as threatened species
- FP=California listed as fully protected
- SSC=California species of special concern
- VU= Vulnerable
- BAGEPA=Bald and Golden Eagle Protection Act
- WL=CDFW watch list

7.0 DISCUSSION AND IMPACT ASSESSMENT

7.1 Significance Criteria

Pursuant to CEQA and CEQA Guidelines, direct and indirect adverse impacts to biological resources are classified as less than significant, potentially significant, or significant. According to CEQA Guideline § 21068, a significant effect on the environment means a substantial, or potentially substantial, adverse change in the environment. According to CEQA Guideline § 15382, a significant effect on the



environment is further defined as 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 historical or aesthetic significance. State, federal, and local jurisdictions and regulations are considered in the evaluation of significance of proposed actions.

Healthcare Facility Replacement Project

| | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| 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 CDFW or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



| | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Collins Pines Optional Heliport and Landing Approach

| | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| Would the Project: | | | | |
| 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 CDFW or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



| | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------|------------------------------|-------------------------------------|
| sites? | | | | |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



7.2 Impacts Analysis

Healthcare Facility Replacement Project

- a. *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?*

7.2.1 Impact BIO-1. Special-Status Plants

No special-status plant species are expected to occur on the Project site due to marginally suitable habitat, anthropogenic disturbance, or the lack of specialized habitats and/or substrates such species require. However, without a formal survey, the absence of special-status plant species cannot be confirmed. Impacting special-status plant species would be considered a significant impact. In order to confirm absence of the listed special-status plant species, pre-construction floristic surveys will be conducted prior to initiation of work activities.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-1: Floristic Surveys

Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and CNPS (2001) published survey guidelines prior to initiation of work activities. Project commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary.

If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan will include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, five-year monitoring program, success criteria (e.g., 70% survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.

Level of Significance after Mitigation: Less than Significant



7.2.2 Impact BIO-2. Nesting Birds (Including Osprey and Bald Eagle) and Special-Status Wildlife: Osprey, bald eagle, Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, California red-legged frog, Cascades frog, delta smelt, western bumblebee, obscure bumblebee, and monarch butterfly

Based on the database and literature review conducted during the desktop review for the proposed Project, thirteen (13) special-status wildlife species have been previously documented in the vicinity of the Project site (see Table 3, Figure 14). Due to lack of suitable habitat and/or lack of recent occurrences in the vicinity of the Project site, eleven (11) special-status wildlife species are not expected to occur and are not discussed further in this Biological Resources Report. These eleven species are: Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, California red-legged frog, Cascades frog, delta smelt, western bumblebee, obscure bumblebee, and monarch butterfly.

Project activities without implemented Avoidance and Mitigation Measures do have the potential to impact nests of both migratory birds and special-status raptor species –osprey and bald eagle. Potential constraints associated with each remaining resource with potential to occur on-site are provided below.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-2a: Environmental Training

Each year prior to the commencement of Project-related activities, a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.

BIO-2b: Migratory Birds and Raptors (osprey and bald eagle)/Nest Avoidance

Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project site where birds could be disturbed by construction-related noise or earth-moving vibrations.



If active nest, roost, or burrow sites are identified within the Project site, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors will be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work will have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

BIO-2c: Bald Eagle and Golden Eagle

In accordance with the BGEPA (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and within 0.5 miles of Project site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified biologist determines the nest is no longer active.

Level of Significance after Mitigation: Less than Significant

- b. *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c. *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Level of Significance before Mitigation: Potentially Significant

7.2.3 Impact BIO-3. Riparian Habitat and Waters of the United States/State

The bed, bank, and channel and associated riparian vegetation of Stover's Ditch to the north of the Project site are potentially subject to CDFW jurisdiction under Section 1600 of CFGC. Stover Ditch may also be considered waters of the United States by USACE and the RWQCB, respectively, pursuant to the CWA. In addition, other signs of aquatic features, namely a swale and constructed ditch were located within the Project area. Prior to Project impacts, these areas should be designated as environmentally sensitive areas



(ESAs) and monitored. If impacts to these features are anticipated, verification by USACE will need to occur, in addition to authorization from the CDFW, USACE, and RWQCB prior to any impact.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-3a: Implementation of ESAs and Monitoring for Waters of the United States and Associated Riparian Zones

Prior to Project implementation, any waters of the United States, potential waters of the United States, and associated riparian zones shall be established as ESAs and marked off with fencing as directed by a qualified biologist. Monitoring by a qualified biologist should occur for any work within close proximity to the ESAs.

BIO-3b: Obtain CDFW Section 1600 Lake or Streambed Alteration Agreement

If Project activities encroach on the riparian zone of Stover's Ditch, the Project proponent shall submit a Section 1600 Notification of Lake or Streambed Alteration application to CDFW. The Notification will include a description of impacts, including quantification of impacts to bed, bank, and channel, as well as individual trees, area and linear footage of riparian vegetation, and proposed mitigation for impacts. Any mitigation measures required to reduce impacts below significance levels would be defined as part of the permit requirements.

BIO-3c: Obtain USACE/RWQCB Section 404/401 Clean Water Act and Porter-Cologne Authorization

If Project activities encroach on the riparian zone of Stover's Ditch, the Project proponent shall obtain the appropriate CWA Section 404 permit from USACE and Section 401 Water Quality Certification and Porter-Cologne Waste Discharge Requirement approval from the RWQCB prior to the discharge of any dredged or fill material within jurisdictional waters of the United States/State. Any mitigation measures required to reduce impacts below significance levels would be defined as part of the permit requirements.

Level of Significance after Mitigation: Less than Significant

- d. *Would the Project 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?*

Level of Significance before Mitigation: No impact

- e. *Would the Project conflict with any local policies or ordinances protecting biological resources,*



such as a tree preservation policy or ordinance?

Level of Significance before Mitigation: No Impact

- f. *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Level of Significance before Mitigation: No Impact

Collins Pines Optional Heliport and Landing Approach

- a. *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?*

7.2.4 Impact BIO-1. Special-Status Plants

No special-status plant species are expected to occur on the Project site due to marginally suitable habitat, anthropogenic disturbance, or the lack of specialized habitats and/or substrates such species require. However, without a formal survey, the absence of special-status plant species cannot be confirmed. Impacting special-status plant species would be considered a significant impact. In order to confirm absence of the listed special-status plant species, pre-construction floristic surveys will be conducted prior to initiation of work activities.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-1: Floristic Surveys

Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and CNPS (2001) published survey guidelines prior to initiation of work activities. Project commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary.

If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this



consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan will include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, five-year monitoring program, success criteria (e.g., 70% survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.

Level of Significance after Mitigation: Less than Significant

7.2.5 Impact BIO-2. Nesting Birds (Including Osprey and Bald Eagle) and Special-Status Wildlife: Osprey, bald eagle, Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, California red-legged frog, Cascades frog, delta smelt, western bumblebee, obscure bumblebee, and monarch butterfly

Based on the database and literature review conducted during the desktop review for the proposed Project, twelve (12) special-status wildlife species have been previously documented in the vicinity of the Project site (see Table 4, Figure 15). Due to lack of suitable habitat and/or lack of recent occurrences in the vicinity of the Project site, ten (10) special-status wildlife species are not expected to occur and are not discussed further in this Biological Resources Report. These ten species are: Sierra Nevada red fox, northern goshawk, greater sandhill crane, southern long-toed salamander, Sierra Nevada yellow-legged frog, Cascades frog, delta smelt, western bumblebee, obscure bumblebee, and monarch butterfly.

Project activities without implemented Avoidance and Mitigation Measures do have the potential to impact nests of both migratory birds and special-status raptor species –osprey and bald eagle. Potential constraints associated with each remaining resource with potential to occur on-site are provided below.

Level of Significance before Mitigation: Potentially Significant

Mitigation Measures:

BIO-2a: Environmental Training

Each year prior to the commencement of Project-related activities, a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.

BIO-2b: Migratory Birds and Raptors (osprey and bald eagle)/Nest Avoidance



Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). However, if clearing and/or construction activities will occur during the migratory bird nesting season, then pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project site where birds could be disturbed by construction-related noise or earth-moving vibrations.

If active nest, roost, or burrow sites are identified within the Project site, a no-disturbance buffer shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances to migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors will be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work will have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.

BIO-2c: Bald Eagle and Golden Eagle

In accordance with the BGEPA (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and within 0.5 miles of Project site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified biologist determines the nest is no longer active.

Level of Significance after Mitigation: Less than Significant

- b. *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c. *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*



Level of Significance before Mitigation: No Impact.

- d. *Would the Project 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?*

Level of Significance before Mitigation: No impact

- e. *Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Level of Significance before Mitigation: No Impact

- f. *Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Level of Significance before Mitigation: No Impact



8.0 REFERENCES

- Baicich PJ, Harrison CJO. 2005. Nests, Eggs, and Nestlings of North American Birds. Second Edition. Princeton University Press. Princeton, New Jersey. 347 pp.
- Baldwin DH, Goldman DH, Keil DJ, Patterson R, Rosatti TJ, Wilken DH, editors. 2012. The Jepson Manual Vascular Plants of California: Second Edition. University of California Press, Berkeley. 1568 pps.
- Beier P, Loe S. 1992. "In my experience.." a checklist for evaluating impacts to wildlife movement corridors. Wildlife Society Bulletin Vol. 20(4): 6.
- Buehler DA. 2000. Bald Eagle (*Haliaeetus leucocephalus*), The Birds of North America Online (Poole A, editor). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America Online: <http://bna.birds.cornell.edu/bna/species/506>.
- California Natural Diversity Data Base (CNDDB). 2020. RareFind 5. Computer Printout for Special-Status Species Within a 3-Mile Radius of the Project Site. California Natural Heritage Division, California Department of Fish and Wildlife, Sacramento, CA.
- California Native Plant Society (CNPS). 2001. Inventory of rare and endangered plants of California (Sixth Edition). Rare plant scientific advisory committee, David P. Tibor, convening editor. California Native Plant Society. Sacramento, CA. 338 pps.
- California Native Plant Society (CNPS). Rare Plant Program. 2020. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). [accessed 2020 March]. <http://www.rareplants.cnps.org>
- California Department of Fish & Wildlife (CDFW). 2016. Complete list of amphibian, reptile, bird and mammal species in California. Published September 2008; updated May 2016.
- California Department of Fish & Wildlife (CDFW). 2018. Special Animals. California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch. October.
- California Department of Fish & Wildlife (CDFW). Bald Eagles in California. Wildlife Branch – Non-Game Wildlife Program, Sacramento, CA. Accessed February 2, 2019.
- California Department of Fish & Wildlife (CDFW). 2019. Special Animals List. California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch. Updated August 2019.
- Ehrlich PR, Dobkin DS, Wheye, D. 1988. The birder's handbook. New York (NY): Simon & Schuster.
- Google Earth Pro. 2020. 3D map, Buildings data layer. [accessed 2020 March]. <http://www.google.com/earth/index.html>



- Remsen JV Jr. 1978. Bird species of special concern in California. California Department of Fish and Game Report No. 78-1.
- Roberson D, Tenney C, editors. 1993. Atlas of the breeding birds of Monterey County California. Monterey (CA): Monterey Peninsula Audubon Society.
- Sawyer JO, Keeler-Wolf T, Evans JM. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society. Sacramento, CA. U.S. Geological Survey. 1991. Woodside, Calif 7.5-minute topographic quadrangle.
- Seneca Healthcare District. 2021. Seneca Healthcare District Facility Masterplanning – 2019/2020. Updated April 2021. Prepared by Aspen Street Architects, Inc. 104pp.
- U.S. Climate Data. 2021. [accessed 2021 June].
<https://www.usclimatedata.com/climate/chester/california/united-states/usca0209>
- U.S. Fish & Wildlife Service (USFWS). 1996. Sacramento Fish & Wildlife Office Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants. Prepared September 23, 1996. Endangered Species Information.
- U.S. Fish & Wildlife Service (USFWS). 2020. Information for Planning and Consultation (IPaC). [accessed 2020 March]. <https://ecos.fws.gov/ipac/>
- U.S. Fish & Wildlife Service (USFWS). 2020. Critical Habitat Portal. [accessed 2020 March]. <http://ecos.fws.gov/crithab>
- U.S. Fish & Wildlife Service (USFWS). 2020. National Wetlands Inventory. [accessed 2020 March]. <https://www.fws.gov/wetlands/>



Table 5. Plant Species Observed on the Seneca Healthcare Replacement Project Site.

| Scientific Name | Common Name | Family Name | Native? |
|----------------------------------------------------------|-------------------------|-----------------|---------|
| <i>Ribes montigenum</i> | Sierra gooseberry | Grossulariaceae | Yes |
| <i>Artemisia tridentata</i> | big sagebrush | Asteraceae | Yes |
| <i>Artemisia dracunculus</i> | tarragon | Asteraceae | Yes |
| <i>Lupinus lapidicola</i> | dwarf lupine | Fabaceae | Yes |
| <i>Chrysothamnus viscidiflorus</i> ssp. <i>puberulus</i> | yellow rabbitbrush | Asteraceae | Yes |
| <i>Horkelia fusca</i> | pinewoods horkelia | Rosaceae | Yes |
| <i>Phacelia hastata</i> | silverleaf phacelia | Boraginaceae | Yes |
| <i>Helianthella californica</i> | California helianthella | Asteraceae | Yes |
| <i>Wyethia mollis</i> | woolly mule's ears | Asteraceae | Yes |
| <i>Berberis aquifolium</i> | Oregon grape | Berberidaceae | Yes |
| <i>Cynoglossum officinale</i> | hound's-tongue | Boraginaceae | No |
| <i>Scirpus microcarpus</i> | panicled bulrush | Cyperaceae | Yes |
| <i>Lonicera cauriana</i> | sweetberry honeysuckle | Caprifoliaceae | Yes |
| <i>Salix</i> spp. | willows | Salicaceae | Yes |
| <i>Populus trichocarpa</i> | black cottonwoods | Salicaceae | Yes |
| <i>Pinus jeffreyi</i> | Jeffrey pine | Pinaceae | Yes |
| <i>Carex pellita</i> | woolly sedge | Cyperaceae | Yes |
| <i>Typha</i> spp. | cattails | Typhaceae | NA |
| <i>Artemisia douglasiana</i> | California mugwort | Asteraceae | Yes |
| <i>Galium</i> spp. | bedstraw | Rubiaceae | Yes |



Table 6. Wildlife Species Observed on the Seneca Healthcare Replacement Project Site.

| Scientific Name | Common Name |
|--------------------------------|----------------------|
| Birds | |
| <i>Turdus migratorius</i> | American robin |
| <i>Cyanocitta stelleri</i> | Steller's jay |
| <i>Junco hyemallis</i> | dark-eyed junco |
| <i>Haemorhous mexicanus</i> | house finch |
| <i>Corvus corax</i> | common raven |
| <i>Picoides oubescens</i> | downy woodpecker |
| <i>Poecile gambeli</i> | mountain chickadee |
| <i>Colaptes auratus</i> | Northern flicker |
| Reptiles | |
| <i>Sceloporus occidentalis</i> | western fence lizard |