Sierra Pacific Industries

Botany Policy for California Timberlands

Revised 1 February 2025







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SIERRA PACIFIC INDUSTRIES

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Preface

Sierra Pacific Industries (SPI) is a third-generation, family-owned forest products company based in Anderson, California. We own and manage 2.4+ million acres of timberland in California, Oregon, and Washington and are one of the largest U.S. lumber manufacturers. We also produce millwork, windows, and renewable energy. SPI is committed to managing its lands in a responsible and sustainable manner to protect the environment while providing quality wood products and renewable power for consumers. We are a certified participant in the independent Sustainable Forestry Initiative to help ensure our forests are here for generations to come and rely on the expertise of our professional foresters and natural resource specialists to also ensure that wildlife habitat, water quality, and other forest values are protected.

Examples of our long-term management commitments include how we manage our lands under three separate federal approvals and permits: the USFWS *SPI Candidate Conservation Agreement with Assurances for Fishers*, the USFWS *Habitat Conservation Plan with Incidental Take Permit for Northern and California Spotted Owls*, and the NOAA *Habitat Conservation Plan with Incidental Take Permit and Safe Harbor Agreement for Seven Anadromous Salmonid Species*. This California Timberlands Botany Policy compliments these large planning efforts and further demonstrates our commitment to sustainable land management benefiting multiple forest resources.

For inquiries regarding SPIs California Timberlands Botany Policy or Botany Program contact:

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Cover photographs (top to bottom): *Lewisia taylorii*; serpentine fen featuring *Darlingtonia californica*; *Hesperocyparis bakeri*; *Calochortus clavatus* var. *avius*; *Claytonia crawfordii*; *Drosera anglica*; *Cornus unalaschkensis*.

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Introduction

Sierra Pacific Industries (SPI) developed a Botany Policy in 2003 to guide botanical resource assessment and management during timber harvest planning activities. The Policy formalized the SPI Botany Program, outlined an implementation schedule, survey procedures, plant protection measures, and described personnel, methods, and resource agency consultation used to develop the Policy. Since 2003 the Botany Program has evolved in response to information gained during Policy implementation, scientific advancement regarding botanical resources on SPI lands, and due to changing regulations.

The goal and objective of the Botany Policy is to continue using a scientifically based, consistent, and straightforward plan to guide our botanical resource management. The SPI Botany Program administers the Botany Policy and supports all SPIs timberland management and related activities including Timber Harvest Plans (THPs), fuels reduction projects, roads, reforestation activities, and other miscellaneous projects or activities. The Botany Program also performs monitoring and related activities to assure the methods and process meet our Botany Policy goals and objectives.

This document presents an updated Botany Policy for SPIs California timberlands and provides current background, regulatory framework, technical methods, and the process SPI uses to address botanical resources during our timberland management and related activities.

Regulatory Framework

All timberland management activities on private lands in California are regulated by the Z'Berg-Nejedly Forest Practice Act of 1974 and its implementing regulations, the California Forest Practice Rules (CFPRs). Those legal authorities require that landowners develop Timber Harvest Plans (THPs) for all commercial timber harvests. A THP is an environmental review document outlining what timber the landowner intends to harvest, harvest methods, and the steps taken to reduce or prevent potential environmental impacts. Timber Harvest Plans are prepared by Registered Professional Foresters (RPFs) licensed by the State Board of Forestry and Fire Prevention. All THPs are submitted to the California Department of Forestry and Fire Protection (CALFIRE) for review and approval and must follow all applicable state and federal regulations. Other state trustee agencies, including California Department of Fish and Wildlife (CDFW), California Geologic Survey, and California Department of Water Resources, participate in a multi-disciplinary review that provides input to CALFIRE during the THP review process and issue separate enforceable permits to protect trustee resources.

The CFPRs rulemaking process, THP document and multi-agency review process, and public comment period for each THP, represent the functional equivalent of an Environmental Impact Report as required by the California Environmental Quality Act (CEQA). Botanical resources are regulated under CEQA §15380(a)(b)(c) by incorporating the Federal Endangered Species Act, (California) Native Plant Protection Act, and California Endangered Species Act for species formerly protected by those regulations (i.e., "listed species"). Other non-listed, but otherwise "rare" species may be included and regulated by CEQA §15380(d).

Botanical Scoping

SPI determines known or potentially occurring botanical resources and management considerations for each THP or related activity using a scoping process. This process provides a systematic means to define qualifying species for consideration, field surveys, and subsequent analysis during project planning and approval. Our determination of species qualifying for consideration during the planning process is consistent with *Attorney General Opinion 95-902* (Lungren and Da Vigo 1996) and focuses on "special-status" species, as described below. With possible exceptions as described in CEQA §15125(c), non-qualifying plant species do not merit consideration, analysis, or protections.

Regulatory Status Criteria and Taxonomy

For SPIs botanical scoping, we define species qualifying for consideration during the planning process for each project. These include listed species and other species meeting CEQA criteria, collectively termed "special-status plants." Specifically, special-status plants include (1) plant species listed as endangered (FE) or threatened (FT) under the Federal Endangered Species Act, and candidate (FC) or proposed (FP) species for federal listing; (2) plant species listed as endangered (SE), threatened (ST), or rare (SR) under the California Endangered Species Act, and candidate (SC) or proposed (SP) species for state listing; or (3) have a California Department of Fish and Wildlife California Rare Plant Rank (CRPR) of 1, 2, 3, or 4.

During each scoping SPI reviews and verifies the regulatory status for all potentially occurring special-status plant species using current (quarterly) lists provided by the CDFW Bibliographic Data Branch (CDFW 2024a, b [and subsequent updates]). Plant nomenclature follows Baldwin et al. (2012) including subsequent descriptions, revisions, errata, and other small changes (Jepson Flora Project 2024), and other taxonomic authorities, as appropriate.

Botanical Scoping Methods

SPI determines potentially occurring special-status plant species in THP or related project areas area by reviewing our corporate database, previous projects in the subject planning watershed(s), professional and institutional knowledge, and numerous other sources, including but not limited to:

- Aerial imagery
- Calflora
- California Department of Conservation geology maps

- California Native Plant Society Electronic Inventory
- California Natural Diversity Database
- CalPhotos
- Consortium of California Herbaria
- Knowledgeable individuals or organizations
- Natural Resource Conservation Service soil maps
- Recent scientific literature
- Resource agency reports

SPI prepares a Botany Scoping Report for each project which includes a project description, specific scoping methods and results, and preliminary Plant Protection Measures (PPMs). This document is submitted with each THP or included in project files, as appropriate.

Each Botany Scoping Report provides lists of known or potentially occurring special-status plant species in a subject project area. These special-status plants include species that qualify or may qualify as endangered, threatened, or rare under CEQA; and species that generally do not qualify as endangered, threatened, or rare under CEQA based on their designated regulatory status (Table 1).

Table 1. Regulatory status designations for special-status plant species that qualify or may qualify as endangered, threatened, or rare under CEQA. SPI California timberlands Botany Policy.

Status	Species designation qualifies or may qualify as endangered, threatened, or rare under CEQA?		
	Qualifies	May qualify	Generally, does not qualify
Federal Endangered	X		
Federal Threatened	X		
Federal Candidate		X	
Federal Proposed		X	
State Endangered	X		
State Threatened	X		
State Rare	X		
State Candidate	X		
State Proposed		X	
California Rare Plant Rank 1		X	
California Rare Plant Rank 2		X	
California Rare Plant Rank 3			X
California Rare Plant Rank 4			X

The special-status plants that qualify or may qualify as endangered, threatened, or rare under CEQA are used to establish a “target list” from which SPI plans appropriately timed field surveys for each project. Special-status plants that generally do not qualify as endangered, threatened, or rare under CEQA are secondarily included in the field surveys, report, and analysis; and considered for elective plant protection measures as appropriate.

Botanical Field Surveys

SPI conducts botanical surveys following the guidelines described in CDFW (2018). Surveys mainly consist of intuitive-controlled surveys in potential habitat for all scoped species (i.e., the target list) within the subject project area. Occasionally, SPI conducts complete surveys for select projects or project components. Surveys are conducted during appropriate flowering periods for the target species or when the species are otherwise identifiable. We collect lists of all plant taxa observed during the surveys and identify all plant taxa to the taxonomic level necessary to determine whether they are a special-status plant. Surveys include notes regarding climatic, timing, or other issues that may affect the comprehensiveness of the results.

Reporting and Documentation

SPIs Botany Program prepares a Botany Survey Report which is submitted with each THP or included in project files, as appropriate, and provides digital files for use during project planning. Following project-level reporting, SPIs survey documentation also includes incorporating the results into a corporate database that integrates all our botanical resource data. We prepare and submit all our special-status plant observations to the CDFW California Natural Diversity Database, and routinely provide our survey and related information to numerous other publicly available sources including Calflora and CalPhotos. SPI also publishes botanical information in peer reviewed scientific journals and maintains a registered Herbarium. The SPI Herbarium participates in the Consortium of California Herbaria and all information is publicly available, including digitally imaged specimens.

THP and Other Project Analysis

All special-status species observed during the botanical surveys are included in the results and analysis for each subject project. If a special-status plant is found within a THP or other project area, the RPF or project manager modifies the silvicultural treatment and/or implements plant protection measures, as necessary, if mitigation is required to avoid potentially significant impacts. Potentially significant impacts are determined during a specific assessment prepared for each project based on the survey results and proposed activities. Plant protection measures include actions such as retention of the species occurrence within a non-harvest area, application of specialized harvest methods (e.g., directional felling, yarding, directed deposition of slash), equipment exclusion or limitation zones, or limitations on the timing of harvest entry. Measures may also include proceeding with a proposed activity and related disturbance when such activity benefits the species. The selection of a particular plant protection measure is based on the biological requirements of the subject special-status plant(s) and the proposed silvicultural treatment or project activity.

Summary

SPI's commitment to responsible and sustainable land management benefits many forest resources, including botanical resources. We avoid potentially significant impacts to these resources by implementing the California Forest Practice Rules, which include numerous measures addressing aquatic and riparian habitat protections, meadows, snags, hardwoods, wildlife trees, forest stand composition and juxtaposition, soil stabilization, and seasonal conditions. Potentially significant impacts to forest resources are also avoided by incorporating our Option A (sustained yield plan), Raptor Policy, and conservation measures included in our fisher CCAA, spotted owl HCP, and salmonid HCP/SHA. These rules, planning documents, and related policies ensure SPI lands maintain continuous and sustainable cycles of forests in various seral stages over time, which provide essential elements for meeting our goal to provide habitats in sufficient quantities and juxtaposition supporting the diverse assemblage of resources occurring in our forests.

Botanical resources benefit from these commitments, rules, planning documents, and related policies; and the additional considerations included in this Botany Policy. Under the Botany Policy and through these collective planning efforts we have analyzed, developed, and implemented site-specific protection and conservation measures for 240+ special-status plant species on our California timberlands. Due to the scoping and field surveys performed for our THPs and related projects, subsequent potential impact analysis, and implementation of appropriate plant protection measures, potential impacts and cumulative impacts to botanical resources resulting from our land management activities do not occur or are reduced to less than significant levels.

SPI Botany Policy and Program measures comply with CEQA requirements, specifically §15380. Any potential impact to a rare, threatened, endangered, or otherwise special-status plant is evaluated for CEQA significance, and if necessary, potential impacts are mitigated. Additionally, the program meets the CDFW Guidelines for *Conservation of Sensitive Native Plant Resources Within the Timber Harvest Review Process and During Timber Harvesting Operations* (CDFG 2005), CDFW special-status plant survey and impact assessment guidelines (CDFW 2018), and CALFIRE guidance described in *Environmental Review of Plans, Reports, and Permits Regarding Potential Adverse Impacts to Botanical Resources from Timber Operations* (CALFIRE 2009).

Since its inception the SPI Botany Program has served as an industry leader for timberland management and botanical resource conservation in California. We have significantly expanded available existing information and made numerous scientific contributions supporting botanical resource management in California forest lands. These contributions include scientific papers summarizing research, new species, and noteworthy collections. Other contributions include providing specimens to numerous Herbaria throughout the U.S. and providing (through 2024) 6,800+ special-status plant records to the CNDDB. Under this revised Policy, SPI's Botany Program will continue providing a scientifically based, consistent, and straightforward process to guide our botanical resource management.

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