

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk

County of: San Diego

From: (Public Agency): Resource Conservation

District of Greater San Diego County (RCDGSDC)

11769 Waterhill Rd, Lakeside, CA 92040

(Address)

Project Title: Palomar Ranger District Goldspotted Oak Borer (GSOB) Management - Annual Application of Contact Insecticide (Project)

Project Applicant: Cleveland National Forest (CNF) - United States Forest Service (USFS), Palomar Ranger District (District)

Project Location - Specific:

Multiple developed recreation and administrative sites within the Palomar Ranger District of the Cleveland National Forest, including Dripping Springs Campground and Fire Station, Oak Grove Campground and Fire Station, Ataxam Mamta'ash Campground, Inaja Memorial Picnic Area, Pine Hills Fire Station, Henshaw Overlook, Crestline Group Campground, Fry Creek Campground, and San Luis Rey Picnic Area.

Project Location - City: _____ Project Location - County: San Diego

Description of Nature, Purpose and Beneficiaries of Project:

The Project consists of annual application of contact insecticide to individual high-value oak trees to manage infestations of the invasive GSOB within existing developed recreation and administrative sites on the CNF. Treatments are limited to individual coast live oak and California black oak trees and are intended to reduce GSOB-related tree mortality, protect public safety, and maintain canopy cover and ecosystem services at heavily used public sites. Insecticide application will be conducted using targeted basal trunk spraying techniques in accordance with USFS protocols and pesticide label requirements. Treatments will occur within previously disturbed and maintained developed sites and will not involve construction, grading, vegetation clearing, or expansion of existing uses. The Project includes extensive avoidance measures, buffers from watercourses, spill prevention procedures, and public safety controls.

Name of Public Agency Approving Project: RCDGSDC

Name of Person or Agency Carrying Out Project: CNF - USFS

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: _____
- ☒ Statutory Exemptions. State code number: PRC § 4799.05(d)(1)(A)

Reasons why project is exempt:

RCDGSDC has determined that the Project is eligible for a Statutory Exemption from environmental review under the California Environmental Quality Act (CEQA) pursuant to Public Resources Code §4799.05(d)(1)(A). PRC §4799.05(d)(1)(A) provides an exemption for wildfire risk reduction projects on federal lands, such as thinning and fuel reduction, that have completed environmental review under the National Environmental Policy Act (NEPA) and receive state funding. The Project has been reviewed under NEPA and determined to be categorically excluded by the USFS pursuant to signed Decision Memos, dated April 6, 2017 and April 25, 2023, and has been allocated funds through the California Department of Forestry and Fire Protection's (CAL FIRE's) Regional Block Grant Pilot Program. This NEPA determination document is included in the administrative record as supporting documentation demonstrating the limited scope of effects, incorporation of extensive project design features, and absence of extraordinary circumstances.

Lead Agency

Contact Person: Heather Cady Area Code/Telephone/Extension: (619) 562-0096 Ext. 108

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature:  Date: 5/26/2026 Title: Director of Forestry and Wildfire Resilience Programs

■ Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

DECISION MEMO
PALOMAR DEVELOPED SITE HIGH-VALUE
TREE PROTECTION PROJECT
U.S. FOREST SERVICE
PALOMAR RANGER DISTRICT
CLEVELAND NATIONAL FOREST
SAN DIEGO COUNTY, CALIFORNIA

INTRODUCTION

The Palomar Ranger District of the Cleveland National Forest proposes to reduce tree mortality of high-value oaks from the invasive goldspotted oak borer, *Agrilus auroguttatus*. Proposed activities would slow tree mortality of dominant canopy oak species, limit loss of shade trees, habitat, and site characteristics, and reduce the risk associated with hazard trees at recreation and administrative sites.

BACKGROUND

The goldspotted oak borer (GSOB), *Agrilus auroguttatus* (Coleoptera: Buprestidae), is an invasive, exotic insect to California. Tree mortality from GSOB was first linked to continuing oak mortality in 2008 in San Diego Co., California (Coleman and Seybold, 2008a, b). This invasive insect has caused elevated levels of oak mortality since 2002 across all land ownerships in San Diego Co. (USDA FHM, 2011). Tree infestation and mortality primarily occurs in large diameter (>18-20 inches diameter at breast height, DBH) coast live oak, *Quercus agrifolia*, and California black oak, *Q. kelloggii*. Tree mortality occurs following several years of repeated and extensive injury from larval feeding.

Although the highest levels of tree infestation and mortality associated with GSOB have been detected in the south east portion of San Diego County, CA, which is also believed to be the center of the outbreak; varying levels of tree mortality associated with GSOB has spread approximately 31 miles to the north across its host range. Elevated levels of tree mortality from GSOB in Southern California are believed to result from a lack of a diverse natural enemy complex and absence of coevolved host resistance.

Injury from GSOB larvae occurs under the bark primarily at the interface of the xylem and phloem, girdling the cambium thus limiting new radial growth and the movement of water and nutrients. Goldspotted oak borer injury can be determined by crown thinness, presence and density of D-shaped exit holes and bark staining, and evidence of woodpecker foraging for GSOB larvae (Hishinuma *et al.*, 2011). Injury from GSOB is concentrated on the lower portion of the main stem and larger branches. Trees with moderate to severe levels of GSOB injury are not expected to recover from GSOB injury. Adult GSOB feeding is restricted to the leaves

where injury is negligible.

Goldspotted oak borer-caused tree mortality has occurred on the Palomar and Descanso Ranger District for over ten years. The Resource Conservation District of Greater San Diego Co. (2010) spent three million dollars in San Diego Co. to mitigate hazard trees either severely injured or killed by GSOB along wildfire corridors and around private dwellings. The Palomar and Descanso Ranger Districts have also removed dead oaks that were considered hazard trees within campgrounds, picnic sites, and other high-value areas. In some cases, these sites have also been temporarily closed due to hazardous conditions.

To maintain the oak component, aesthetics, and recreational activities at high-value sites, the Palomar Ranger District proposes to treat un-infested or lightly-infested coast live oaks, canyon live oaks, and Engelmann oaks at three developed sites, Oak Grove Campground, Oak Grove Administrative site, and the Pine Hills Fire Station, near Julian, CA.

These insecticide treatments have been shown to reduce viable GSOB brood emergence and adult populations when applied during spring and early summer months prior to peak flight months in mid to late summer (Coleman *et al.* 2016).

DECISION

I have decided to conduct forest health treatments on high-value oak trees at one developed recreation and two administrative sites totaling 93 acres. All three sites are located on the Palomar Ranger District within San Diego County, CA, as shown on the attached maps.

Forest health treatments will occur at three sites, including Oak Grove Campground, Oak Grove Administrative Site, and Pine Hills Fire Station. High-value coast live oaks >15" DBH and that add an important element to the recreational setting will only be treated in these sites. All proposed treatment areas currently possess injury and previous tree mortality from GSOB in the high-value site or immediately around the perimeter of the site.

Forest health treatments will consist of spraying the boles and larger branches (>5" DBH) of individually selected high-value coast live oaks, canyon live oaks, and Engelmann oaks with Carbaryl (example: Sevin XL). Insecticide will be applied to saturation on the bark exterior. Treatments will be carried out with high-pressure spray equipment and applied from the ground. Treatments will be conducted in late March thru the end of May of 2017 prior to emergence of GSOB adults and will not run past mid-June 2017 before the peak flight period of GSOB adults. Treatments are expected to continue each year during the same time period over the next 5 year period, barring changes in conditions which may trigger a new analysis or lapse in funding for treatments.

Oaks meeting the previous aforementioned qualifications and either un-infested by GSOB or with only light-levels of GSOB injury as quantified by Hishinuma *et al.* (2011) will be treated. Oaks smaller than 15" DBH, possessing moderate to severe levels of GSOB injury, and within 100 feet of standing water, intermittent, ephemeral or a live channel/stream will not be treated with insecticide application.

Project Design Features:

General:

- Treatment areas (or trees to be treated) will be designated prior to spraying.
- Each individual tree selected for treatment will be identified with a permanent numbered tag. An inventory of these trees will be maintained to aid in contract inspection, monitoring, and any follow-up treatment needs. The inventory will also record information about each tree, such as diameter and GSOB injury rating, to add information for treatment effectiveness monitoring.

Herbicide Application/Human Health:

- The area will be clearly posted with signs explaining that insecticides have recently been applied, what the chemical is, who to contact with questions, and when the area will be opened again. These signs will be bilingual; English and Spanish.
- The insecticide will be applied by a state-licensed pesticide applicator. A Forest Service contract inspector will be on-site at all times, including during mixing and clean-up operations to ensure all contract requirements are met.
- Contractor, his employees, and any Forest Service representatives on site during times of application must wear all Personal Protection Equipment (PPE) as specified on the manufactured Material Data Safety Sheet (MDSS), including:
 - Wearing long-sleeved shirt, long pants and shoes plus socks and chemical resistant headgear.
 - Workers MUST be wearing waterproof gloves.
 - If clothing becomes drenched or heavily contaminated with the product, it should be discarded. Other clothing should be frequently washed with hot water and detergent
- Topical insecticide treatments will follow all label restrictions with respect to wind speed and treatments near adjacent water courses. If those certain conditions are not present, spraying will be stopped until those conditions are present and likely to remain present.
- Wind speeds shall not exceed 5 miles per hour on a sustained basis, as measured by standard FS "belt weather kit" procedures, and will be measured by Forest Service Inspectors. Wind direction will be monitored to assure that drift is minimized, especially in the direction of any water.

Botany:

- Contractor will follow label directions for minimizing impacts to bees if bees are foraging in the area. This includes early morning or late evening applications. The contractor will work with the COR to determine if bee impact minimization practices need to be followed at each site.

Soils and Water:

- No spraying will occur within 100 of surface water or wetland areas.

- No spraying within 100 feet of intermittent and ephemeral channels if the bottom of the channel is wet and/or contains snow.
- No spraying to any tree bole that is within 5 feet of a dry channel.
- No spraying across any flowing channels and effort will be made to direct spray parallel or away from the direction of the channel.
- To minimize drift of spray droplets, spraying will be done only when wind is 0-5 mph.
- Application of spray to any trees when will not occur when rain is likely within 6 hours. This is to allow for the spray to dry. And no spraying of trees near intermittent and ephemeral channels when precipitation is forecasted within the next 3 days.
- Application must comply with all federal, state and local pesticide laws and regulations regarding pesticide application during project implementation as well as follow label directions.
- Locate operation bases for mixing/filling/refilling application equipment on upland areas, outside of wetlands or areas with channel or ditch connection to surface water and RCAs.
- Mixing and loading of insecticide shall be done in areas where accidental spills would not contaminate streams or other water sources. Mixing locations would be designated 300 feet from intermediate and perennial streams, and 98 feet from ephemeral channels. An impervious membrane will be placed under the equipment when mixing and loading of insecticide is occurring.
- Spray preparation will occur at designated paved site that is more than 300 feet from any perennial and intermittent channel, and more than 98 feet from an ephemeral channel. . An impervious membrane will be placed under the truck, mixing equipment, and loading equipment so that spills may be contained. An adsorbent will be available to pick up all spills.
- If equipment is to be fueled or serviced on site the refueling and servicing will at a designated site 300 feet from any perennial and intermittent channel and at least 98 feet from an ephemeral channel. An impervious membrane will be placed under the equipment when they are serviced.
- Develop a chemical spill contingency plan and implement the plan in the event of a spill.
- Ensure application equipment is calibrated for the correct application rate and is in proper functioning condition. Equipment is not leaking.
- Stabilize pesticide containers during transportation to and from the site to prevent spills.
- Cleaning and disposal of insecticide containers must be done in accordance with Federal, State, and local laws, regulations, and directives, specifically Forest Service Pesticide Use Management and Coordination Handbook (FSH 2109.114).
- All empty and used spray containers and spent adsorbent will be disposed in a properly designed and designed waste container. All spent adsorbent along with other waste materials from spraying will be disposed of at an approved landfill.

Recreation:

- Developed Recreation and Administrative sites would be closed to public and employees during periods of insecticide application and for up to 48 hours after applications cease, or as long as it takes to sufficiently dry, to negate any potential effects to human health.
- Picnic tables, fire grates, well pumps, toilets and other improvements will be covered to avoid contamination spray drift during the spraying operations.

Cultural:

- Historic building sites will be identified to the project manager who will implement measures to protect these sites from the effects of the spraying such as but not limited to: no staging of project materials or activities on the site, minimize overspray, no access via the site, and treat trees on the site with spraying only as a last resort.

Forest Health:

- A Forest Service Entomologist will monitor Goldspotted oak borer and other wood boring populations with purple prism flight-intercept traps and clear panel traps affixed to the main stem. Trapping will occur within the treated areas and adjacent untreated areas to provide as a comparison. Individually treated trees will also be monitored once a year by assessing GSOB injury levels following protocols by Coleman et al. (2011). Trapping of wood boring beetles and tree health assessments will be used to assess the efficacy of the insecticide treatments. Monitoring will occur for at least two years following the treatment applications.

This action is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA). The applicable category of actions is identified in agency procedures as 36 CFR 220.6 (d) (3) – “Repair and maintenance of administrative sites” and 36 CFR 220.6 (d) (5) – “Repair and maintenance of recreation sites and facilities”, as described in FSH 1909.15 Sec. 31.2. This category of action(s) is applicable because proposed forest health treatments fit within the example listed for this category, “(IV) *Applying registered pesticides for rodent or vegetation control.*” Furthermore, a supporting record and a decision memo are not required for these categories, but one has been prepared at the discretion of the responsible official.

REASONS FOR CATEGORICALLY EXCLUDING THE DECISION

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist:

- Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species (TESP) –

Within the Project Area, there are no known occurrences of TESP wildlife species at these sites.

Federally-listed Quino Checkerspot are known from the vicinity (uphill along Oak Grove Truck trail). Both areas have been surveyed in conjunction with previous projects or activities and not found within the project boundaries. Therefore it is highly unlikely that impacts to this species will occur from implementation.

There is modeled habitat for SW Willow Flycatcher and Arroyo Toad at Pine Hills, however there is no suitable habitat present at the site. Therefore no impacts to these species will occur.

There is modeled habitat for Stephen's kangaroo rat, Least Bell's Vireo and Arroyo Toad at Oak Grove, however there is no suitable habitat present at the site. Therefore no impacts to these species will occur.

There are no TESP plant species within the project area. Additionally, there are no invasive plant species known to occur within the project area, therefore no impacts to these species will occur.

There is one Regional Foresters Plant Species, Descanso milk vetch (*Astragalus oocarpus*); approximately 500 feet north east from the Inaja Memorial Picnic Area included in the project area. Bees are the primary pollinating agent for most milk vetches, and the timing of the spraying (April-May) could coincide with the milk vetch's flowering period (April-August) as per The Jepson Manual and local records. Honeybees and bumblebees are known to fly over one mile to forage for nectar, and have been recorded flying up to 7 miles. Therefore, if bees were negatively affected, this proposed project may have an effect on the reproduction of the Descanso milk vetch. Mitigation prescribing hours of the day to avoid applications will minimize impacts to bees during application and is included in the project design features.

- Flood plains, wetlands, or municipal watersheds –

The project area is not located within flood plains or wetlands. The following municipal watersheds (HUC 6) are affected: Upper San Diego (Pine Hills) and Upper Temecula Creek (Oak Grove). Additionally, project areas are located in or adjacent to RCA's. However there will be no impacts to water quality within these areas as a result of this project as design features and Best Management Practices recommended by the Watershed Program Manager have been incorporated in the decision to preclude soil erosion and adverse impacts to water quality throughout the project area as a result of implementation (see project file).

- Congressionally designated areas such as wilderness, wilderness study areas, or national recreation areas –

The project area is not located within a congressionally designated area such as wilderness, wilderness study area, or national recreation area.

- Inventoried roadless areas or potential wilderness areas –

The project area is not located within an inventoried roadless area or potential wilderness area.

- Research natural areas –

The project area is not located within a research natural area.

- American Indians and Alaska Native religious or cultural sites –

No American Indian and Alaska Native religious or cultural sites have been identified within the project area, as determined through Native American consultation on record in the project file.

- Archaeological sites, or historic properties or areas –

A desktop review of previous cultural resources survey conducted within or adjacent to the project area identified 3 prehistoric or historic sites within or adjacent to the treatment unit boundaries. These sites would not be adversely impacted due to the non-ground disturbing nature of prescribed treatment.

Under stipulations of the programmatic agreement among the U.S.D.A. Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding the processes for compliance with Section 106 of the National Historic Preservation Act for the Management of Historic Properties by the National Forests of the Pacific Southwest Region, the Mandatory Section 106 requirements for this project have been met.

- Human Health

Potential impacts to human health are fully analyzed in the Risk Assessment for Carbaryl (SERA 2008) and have been incorporated by reference into the Human Health assessment (see project file). This project contains no extenuating circumstances or situations which are beyond the assumptions for exposure contained in the Risk Assessment for Carbaryl.

As long as all safety precautions are followed, mainly workers wearing proper PPE and non-workers not being allowed into project sites until after pesticide has dried onto the tree surface, this project does not carry a significant or unknown risk to human health.

PUBLIC INVOLVEMENT

This action was originally listed as a proposal on the Cleveland National Forest Schedule of Proposed Actions on March 7, 2017. Forest Service contacted Chris Murphy, a community member of Oak Grove, on several occasions to discuss the proposed treatments to Forest Service land at oak grove. The community of Oak Grove conducted similar treatments on private lands in 2016 and has brought more land owners on board to treat GSOB infested trees in 2017. The community is supportive of the project.

Tribal Consultation was initiated early March 3, 2017, by email, to potentially affected tribes. A copy of the proposed action and maps showing the project area were included.

As of the date of signing, only supportive comments have been received.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

This decision is consistent with the Cleveland National Forest Land Management Plan of 2006. The project was designed in conformance with the Aquanga Place and Upper San Diego River Place, as well as, guidance for allowed activities in Back Country and Developed Area Interface land use zones described in the plan.

The project meets intent of the Places desired conditions and program emphasis by preserving key landscape attributes, i.e. oaks and maintaining the scenic integrity of the rural backdrop.

ADMINISTRATIVE REVIEW (OBJECTION) OPPORTUNITIES

This decision is not subject to objections pursuant to 36 CFR 218.

IMPLEMENTATION DATE

The decision may be implemented immediately.

CONTACT

For additional information concerning this decision, contact:

Andrew Weinhart, Planning Forester, by phone at 858-674-2934, by email at aweinhart@fs.fed.us, or by mail at Cleveland National Forest Supervisor's Office, 10845 Rancho Bernardo Road, Suite 200, San Diego, CA 92127.


CHRISTOPHER D. DOWLING

4/6/2017
Date

Palomar Ranger District

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REFERENCES:

- Coleman, T. W., and S. J. Seybold. 2008a. New pest in California: the goldspotted oak borer, *Agrilus coxalis* Waterhouse. U.S. Dep. Agric. Forest Service, Pest Alert, R5-RP-022, 28 October 2008.
- Coleman, T. W., and S. J. Seybold. 2008b. Previously unrecorded damage to oak, *Quercus* spp., in southern California by the goldspotted oak borer, *Agrilus coxalis* Waterhouse (Coleoptera: Buprestidae). Pan-Pac. Entomol. 84: 288Ð300.
- Coleman, T.; Smith, S.; Jones, M.; Graves, A.; Strom, B. 2016. Effect of Contact Insecticides against the Invasive Goldspotted Oak Borer (Coleoptera: Buprestidae) in California. Journal of Economic Entomology, 2016, 1-10. Doi: 10.1093/jee/tow217.
- Hishinuma, S., T. W. Coleman, M. L. Flint, and S. J. Seybold. 2011. Goldspotted oak borer: field identification guide, University of California Agriculture and Natural Resources, Statewide Integrated Pest Management Program, 13 January 2011. (http://www.ipm.ucdavis.edu/PDF/MISC/GSOB_field-identification-guide.pdf).
- SERA - Syracuse Environmental Research Associates, Inc. Carbaryl –*Human Health and Ecological Risk Assessments*. Final report. February 9, 2008. Fayetteville, NY. Available: <http://www.fs.fed.us/foresthealth/pesticide/risk.shtml>
- (USDA FHM) USDA Forest Service, Forest Health Monitoring (FHM). 2011. Aerial survey region 5 database. (<http://www.fs.fed.us/r5/spf/fhp/fhm/aerial/index.shtml>).

Enclosure(s): Maps (3)

PROJECT AREA MAP
PRD Developed Sites
High-Value Tree Insecticide
Treatments
Map 1 of 3 - Oak Grove

Location Map

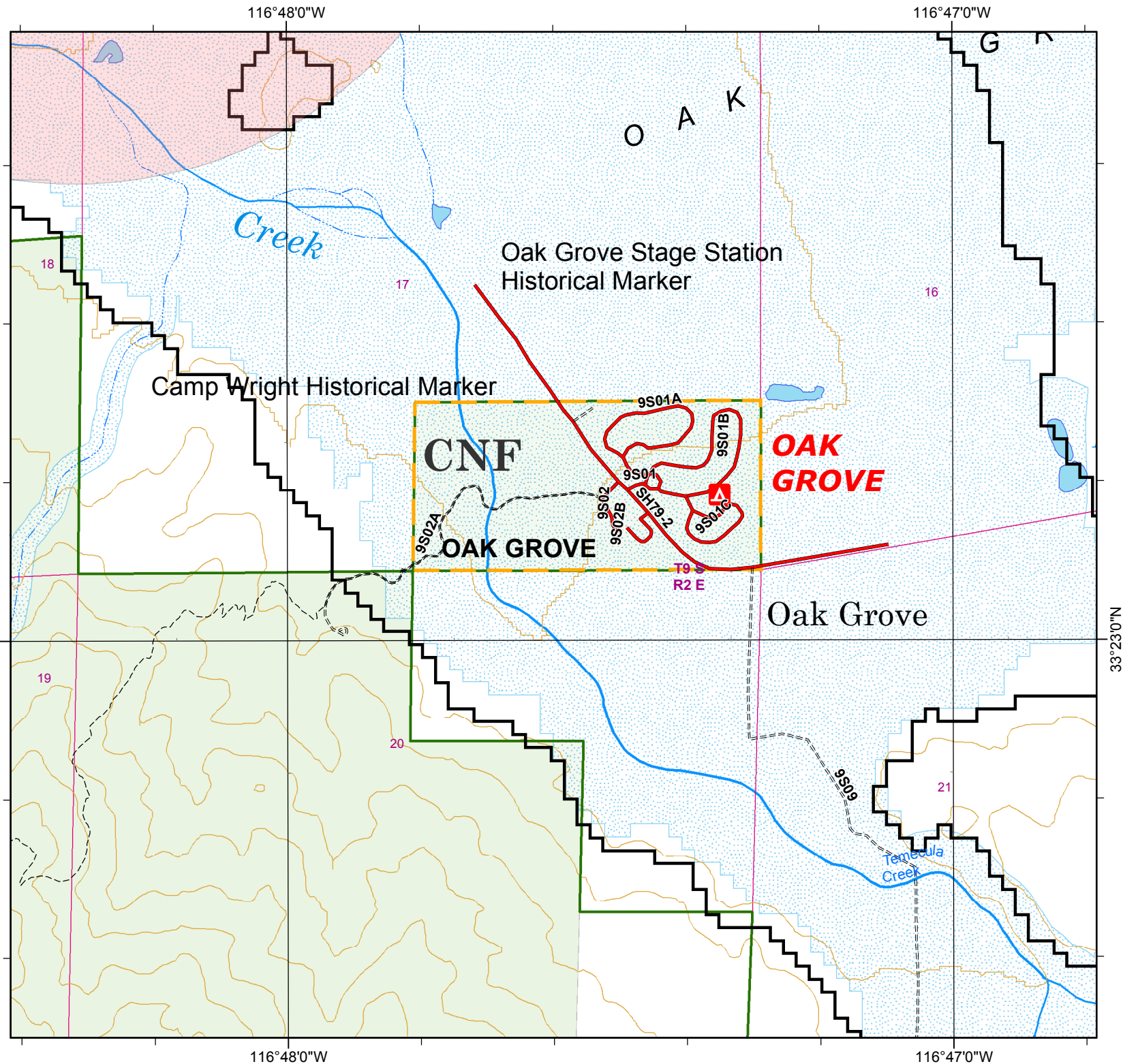


Legend

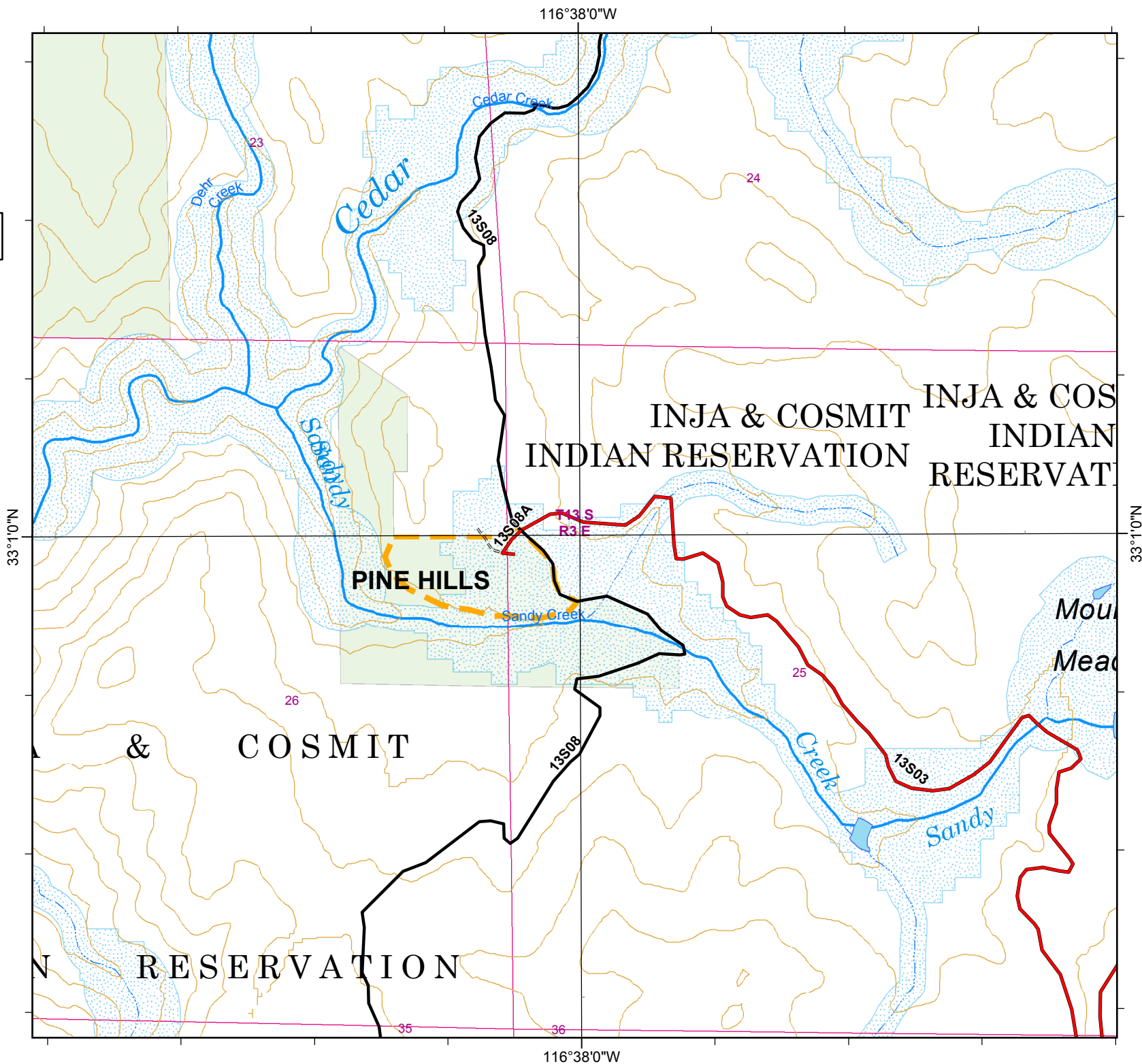
- FWS Critical Habitat - Arroyo Toad
- Carbaryl Application
- Quino Occurrence
- S_R05_CNF.RiparianConservation...
- CAMPGROUND
- 2 - HIGH CLEARANCE VEHICLES
- 5 - HIGH DEGREE OF USER COMFORT
- Trails
- National Forest Administrative Boundary
- Ranger District Boundary
- Ownership**
- USDA FOREST SERVICE
- NON-FS



Miles



- Insecticide Application
- Riparian Conservation Areas
- 2 - HIGH CLEARANCE VEHICLES
- 4 - MODERATE DEGREE OF USER COMFORT
- 5 - HIGH DEGREE OF USER COMFORT
- National Forest Administrative Boundary
- Ranger District Boundary
- Ownership**
- USDA FOREST SERVICE
- NON-FS



PROJECT AREA MAP
PRD Developed Sites
High-Value Tree Insecticide
Treatments
Map 3 of 3. Inaja Memorial

Location Map



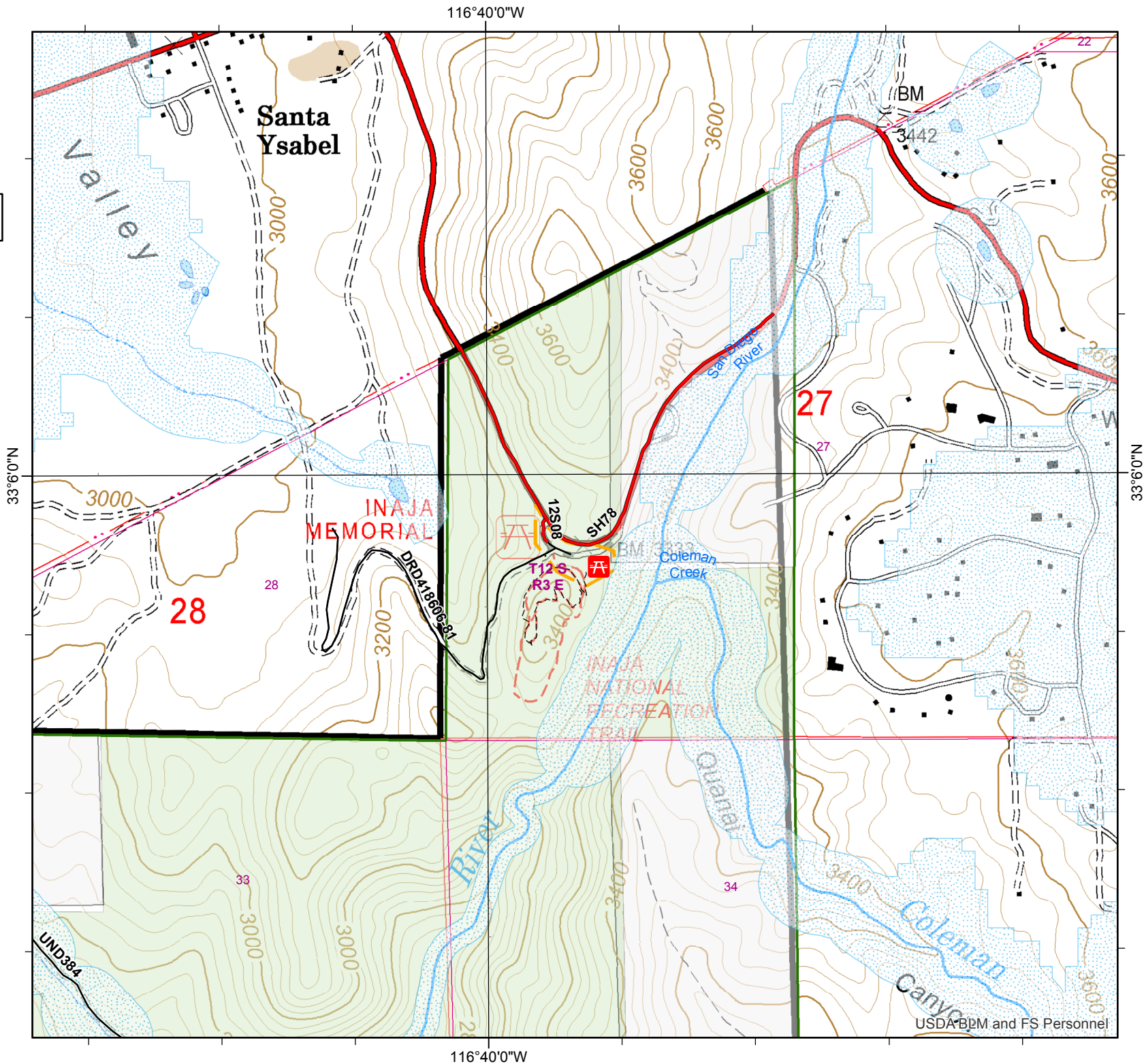
Legend

-  Inaja Memorial Picnic Area - 3.6 acres
-  Riparian Conservation Area
-  PICNIC SITE
-  5- HIGH DEGREE OF USER COMFORT
-  <Null>
-  S_R05_CNF.Road (Corporate Roads)
-  Trails
-  National Forest Administrative Boundary
-  Ranger District Boundary
- Ownership**
-  USDA FOREST SERVICE
-  NON-FS



1:12,000

Miles





Decision Memo

Palomar Developed Site Goldspotted Oak Borer Management Project (Phase 2)

U.S. Forest Service

Palomar Ranger District, Cleveland National Forest

San Diego County, California

This decision incorporates all information in the CE Review Form and included in the project file.

Decision and Rationale

I have decided to authorize the activities described in the “[Proposed Action](#)” section (CE Review Form), including any modifications that resulted from environmental analysis and review of regulatory compliance.

Applicable Categorical Exclusion and Findings Required by Other Laws

The “[Applicable Categories](#)” section (CE Review Form) provides rationale for categorically excluding this action from documentation in an Environmental Assessment (EA) or Environmental Impact Statement (EIS) and for using the identified category/categories. The “[Environmental Analysis Review](#)” section (CE Review Form) documents rationale to support my finding that no extraordinary circumstances exist, along with findings required by other applicable laws and regulations to demonstrate compliance with the regulatory framework for the activities authorized by this decision.

Agencies, Organizations and Persons Contacted

A list of “[Agencies, Organizations and Persons Contacted](#)” regarding this proposal is provided in the CE Review Form, along with a brief overview of comments/feedback received and how they were considered.

Implementation Date

I intend to implement the decision annually beginning spring 2023.

Administrative Review

Decisions that are categorically excluded from documentation in an environmental assessment or environmental impact statement are not subject to an administrative review process (Agriculture Act of 2014 [Pub. L. No. 113-79], Subtitle A, Sec. 8006).

Contact

For additional information concerning this decision, contact:

Andrew Weinhart, Forester

Cleveland National Forest, 10845 Rancho Bernardo Road, Suite 200, San Diego, CA 92127

Andrew.Weinhart@usda.gov

P:858-674-2934

Scott Tangenberg

Forest Supervisor, Cleveland National Forest



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Categorical Exclusion Review

Project Information

Project Name: Palomar Developed Site Goldspotted Oak Borer Management Project (Phase 2)

Proposal Date: 2/3/2023

Proponent Name: Andrew Weinhart

Responsible Official: Scott Tangenberg, Forest Supervisor

Unit: Cleveland National Forest, Palomar Ranger District

County(ies): San Diego County

Anticipated Implementation: Treatments will be conducted in mid-May through mid-June prior to emergence of goldspotted oak borer (GSOB) adults and will not run past end of June- for the next 10 years

Signing Authority: Forest Supervisor

PALS Tracking #: 63570

Project File: <https://usfs.app.box.com/folder/186521456006>

GIS Info: T:\FS\NFS\Cleveland\Project\Palomar\GSOBInsecticideApplication2022

General Location: All prospective treatment areas lie within the northern portion of the Palomar Ranger District, generally in the vicinity of Palomar Mountain and Highways CA-76 and CA-79 (See Figures 1-4).

Legal Location:

Site Name	See Figure	Township	Range	Section
Crestline Picnic Area	1	10S	1E	15
Fry Creek Campground	1	9S	1E	15
Palomar Fire Station	1	9S	1E	27
Henshaw Overlook	2	10S/11S	2E	34/3
San Luis Rey Picnic Area	2	11S	2E	5
Ataxam mamta'ash Campground	3	9S	3E	27/34
Dripping Springs (Trailhead, Campground and Fires Station)	4	8S	1W	22

Land Use Zone, Watersheds, Applicable Management Areas:

Site Name	Map	LUZ	Watersheds	Management Areas
Crestline Picnic Area	1	DAI	SLR/E	RCA
Fry Creek Campground	1	DAI	SLR/E	RCA
Palomar Fire Station	1	DAI	SLR/E and SM	None
Henshaw Overlook	2	BC	SLR/E	None
San Luis Rey Picnic Area	2	BC, CB	SLR/E	RCA
Ataxam mamta'ash Campground	3	BC	SLR/E	Pine Valley SIA
Dripping Springs (Trailhead, Campground and Fires Station)	4	DAI	SM	RCA

Land Use Zones: DAI: Developed Area Interface, BC: Backcountry, CB: Critical Biological

Watersheds: SM: Santa Margarita, SLR/E: San Luis Rey / Escondido



Applicable Management Areas: RCA: Riparian Conservation Area, SIA: Special Interest Area

Applicable Categories

This project is categorically excluded from documentation in an environmental assessment or environmental impact statement because it fits the following category, pending extraordinary circumstance determinations:

Applicable Category or Categories:

36 CFR 220.6(d)(3) (DM Not Required)

This category is applicable for this project because the proposed forest health treatments fit within the example listed for this category, "(IV) Applying registered pesticides for rodent or vegetation control." Furthermore, a supporting record and a decision memo are not required for these categories, but one has been prepared at the discretion of the responsible official..

Purpose and Need: Why do we need to act?

The goldspotted oak borer (GSOB), *Agrilus auroguttatus* (Coleoptera: Buprestidae), is an invasive, exotic insect to California. Tree mortality from GSOB was first linked to continuing oak mortality in 2008 in San Diego Co., California (Coleman and Seybold, 2008a, b). This invasive insect has caused elevated levels of oak mortality since 2002 across all land ownerships in San Diego Co. (USDA FHM, 2022). Tree infestation and mortality primarily occurs in large diameter (>18-20 inches diameter at breast height, DBH) coast live oak, *Quercus agrifolia*, and California black oak, *Q. kelloggii*. Tree mortality occurs following several years of repeated and extensive injury from larval feeding.

Although the highest levels of tree infestation and mortality associated with GSOB have been detected in the southeast portion of San Diego County, CA, which is also believed to be the center of the outbreak; varying levels of tree mortality associated with GSOB has spread approximately 31 miles to the north across its host range. Elevated levels of tree mortality from GSOB in Southern California are believed to result from a lack of a diverse natural enemy complex and absence of coevolved host resistance.

Injury from GSOB larvae occurs under the bark primarily at the interface of the xylem and phloem, girdling the cambium thus limiting new radial growth and the movement of water and nutrients. Goldspotted oak borer injury can be determined by crown thinness, presence and density of D-shaped exit holes and bark staining, and evidence of woodpecker foraging for GSOB larvae (Hishinuma et al., 2011). Injury from GSOB is concentrated on the lower portion of the main stem and larger branches. Trees with moderate to severe levels of GSOB injury are not expected to recover from GSOB injury. Adult GSOB feeding is restricted to the leaves where injury is negligible.

The project is needed because Goldspotted oak borer-caused tree mortality has occurred on the Palomar and Descanso Ranger District for over 15 years. The Resource Conservation District of Greater San Diego Co. (2010) spent three million dollars in San Diego Co. to mitigate hazard trees either severely injured or killed by GSOB along wildfire corridors and around private dwellings. The Palomar and Descanso Ranger Districts have also removed dead oaks that were considered hazard trees within campgrounds, picnic sites, and other high-use areas. In some cases, these sites have also been temporarily closed due to hazardous conditions.

These insecticide treatments have been shown to reduce viable GSOB brood emergence and adult populations when applied during spring and early summer months prior to peak flight months in mid to late summer (Coleman et al. 2016). In addition, the Cleveland National Forest has had success preventing oak mortality with similar treatments at several other locations.

The purpose of the project is to reduce tree mortality of at-risk oaks from the invasive goldspotted oak borer, *Agrilus auroguttatus*. Proposed activities would slow tree mortality of dominant canopy oak species, limit loss of shade trees, habitat, and site characteristics, and reduce the risk associated with



hazard trees at recreation and administrative sites in order to maintain the oak component, aesthetics, and recreational activities at high-use sites.

Proposed Action: What are we proposing to do?

The Cleveland National Forest proposes to conduct forest health treatments on un-infested or lightly infested at-risk oak trees (coast live oaks, canyon live oaks, and Engelmann oaks) at several developed recreation and administrative sites totaling 115 acres. Each of the sites are located on the Palomar Ranger District within San Diego County, CA, as shown on the attached maps.

Treatments will occur at seven developed recreation sites and two administrative sites:

- Crestline Picnic Area
- Fry Creek Campground
- Palomar Fire Station
- Henshaw Overlook
- San Luis Rey Picnic Area
- Ataxam mamta'ash Campground
- Dripping Springs Trailhead,
- Dripping Springs Campground
- Dripping Springs Fire Station

At-risk oaks >14" DBH and that add an important element to the recreational setting will only be treated in these sites. All proposed treatment areas currently possess injury and previous tree mortality from GSOB within or immediately around the perimeter of the site.

Forest health treatments will consist of spraying the boles and larger branches (>5" DBH) of individually selected at-risk coast live oaks, canyon live oaks, and Engelmann oaks with Carbaryl (example: Sevin XL). Insecticide will be applied to saturation on the bark exterior. Treatments will be carried out with high-pressure spray equipment and applied from the ground. Treatments will be conducted in mid-May thru the mid- June prior to emergence of GSOB adults and will not run past end of June before the peak flight period of GSOB adults. Treatments are expected to continue each year during the same time period over the next 10-year period, barring changes in conditions which may trigger a new analysis or lapse in funding for treatments.

Oaks meeting the previous aforementioned qualifications and either un-infested by GSOB or with only light-levels of GSOB injury as quantified by Hishinuma et al. (2011) will be treated.

Under the following criteria, individual oak trees will not be treated if:

- 1) diameter at breast height is less than 14 inches; or
- 2) tree possesses moderate to severe levels of GSOB injury; or
- 3) the tree stem is located within 50 feet of a stream course where running water is observed

Project Design Features:

General:

- Treatment areas (or trees to be treated) will be designated prior to spraying.



- Each individual tree selected for treatment will be identified with a permanent numbered tag. An inventory of these trees will be maintained to aid in contract inspection, monitoring, and any follow-up treatment needs. The inventory will also record information about each tree, such as diameter and GSOB injury rating, to add information for treatment effectiveness monitoring.

Herbicide Application/Human Health:

- The area will be clearly posted with signs explaining that insecticides have recently been applied, what the chemical is, who to contact with questions, and when the area will be opened again. These signs will be bilingual; English and Spanish.
- The insecticide will be applied by a state-licensed pesticide applicator. A Forest Service contract inspector will be on-site at all times, including during mixing and clean-up operations to ensure all contract requirements are met.
- Contractor, his employees, and any Forest Service representatives on site during times of application must wear all Personal Protection Equipment (PPE) as specified on the manufactured Material Data Safety Sheet (MDSS), including:
 - Wearing long-sleeved shirt, long pants and shoes plus socks and chemical resistant headgear.
 - Workers MUST be wearing waterproof gloves.
 - If clothing becomes drenched or heavily contaminated with the product, it should be discarded. Other clothing should be frequently washed with hot water and detergent
- Topical insecticide treatments will follow all label restrictions with respect to wind speed and treatments near adjacent water courses. If those certain conditions are not present, spraying will be stopped until those conditions are present and likely to remain present.
- Wind speeds shall not exceed 5 miles per hour on a sustained basis, as measured by standard FS "belt weather kit" procedures and will be measured by Forest Service Inspectors. Wind direction will be monitored to assure that drift is minimized, especially in the direction of any water.

Botany:

- Contractor will follow label directions for minimizing impacts to bees if bees are foraging in the area. This includes early morning or late evening applications. The contractor will work with the COR to determine if bee impact minimization practices need to be followed at each site.

Soils and Water:

- No spraying will occur within 50 feet of surface water or wetland areas.
- No spraying within 50 feet of intermittent and ephemeral channels if running water is observed
- Within 50 to 100 feet of running water, low pressure sprayers will be used to minimize drift
- No spraying to any tree bole that is within 5 feet of a dry channel.
- No spraying across any flowing channels and effort will be made to direct spray parallel or away from the direction of the channel.
- To minimize drift of spray droplets, spraying will be done only when wind is 0-5 mph.



- Application of spray to any trees when will not occur when rain is likely within 6 hours. This is to allow for the spray to dry. And no spraying of trees near intermittent and ephemeral channels when precipitation is forecasted within the next 3 days.
- Application must comply with all federal, state, and local pesticide laws and regulations regarding pesticide application during project implementation as well as follow label directions.
- Locate operation bases for mixing/filling/refilling application equipment on upland areas, outside of wetlands or areas with channel or ditch connection to surface water and RCAs.
- Mixing and loading of insecticide shall be done in areas where accidental spills would not contaminate streams or other water sources. Mixing locations would be designated 300 feet from intermediate and perennial streams, and 98 feet from ephemeral channels. An impervious membrane will be placed under the equipment when mixing and loading of insecticide is occurring.
- Spray preparation will occur at designated paved site that is more than 300 feet from any perennial and intermittent channel, and more than 98 feet from an ephemeral channel. . An impervious membrane will be placed under the truck, mixing equipment, and loading equipment so that spills may be contained. An adsorbent will be available to pick up all spills.
- If equipment is to be fueled or serviced on site, the refueling and servicing will at a designated site 300 feet from any perennial and intermittent channel and at least 98 feet from an ephemeral channel. An impervious membrane will be placed under the equipment when they are serviced.
- Develop a chemical spill contingency plan and implement the plan in the event of a spill.
- Ensure application equipment is calibrated for the correct application rate and is in proper functioning condition. Equipment is not leaking.
- Stabilize pesticide containers during transportation to and from the site to prevent spills.
- Cleaning and disposal of insecticide containers must be done in accordance with Federal, State, and local laws, regulations, and directives, specifically Forest Service Pesticide Use Management and Coordination Handbook (FSH 2109.114).
- All empty and used spray containers and spent adsorbent will be disposed in a properly designed and designed waste container. All spent adsorbent along with other waste materials from spraying will be disposed of at an approved landfill.

Recreation:

- Developed Recreation and Administrative sites would be closed to public and employees during periods of insecticide application and for up to 48 hours after applications cease (or as long as it takes to sufficiently dry) to negate any potential effects to human health.
- Picnic tables, fire grates, well pumps, toilets and other improvements will be covered to avoid contamination spray drift during the spraying operations.

Cultural:

- Historic building sites will be identified to the project manager who will implement measures to protect these sites from the effects of the spraying such as but not limited to: no staging of project



materials or activities on the site, minimize overspray, no access via the site, and treat trees on the site with spraying only as a last resort.

Forest Health:

- A Forest Service Entomologist will monitor goldspotted oak borer and other wood boring populations with purple prism flight-intercept traps and clear panel traps affixed to the main stem. Trapping will occur within the treated areas and adjacent untreated areas to provide as a comparison. Individually treated trees will also be monitored once a year by assessing GSOB injury levels following protocols by Coleman et al. (2011). Trapping of wood boring beetles and tree health assessments will be used to assess the efficacy of the insecticide treatments. Monitoring will occur for at least two years following the treatment applications.

Figure 1: Fry Creek Campground, Palomar Fire Station, and Crestline Picnic Area Treatment Areas

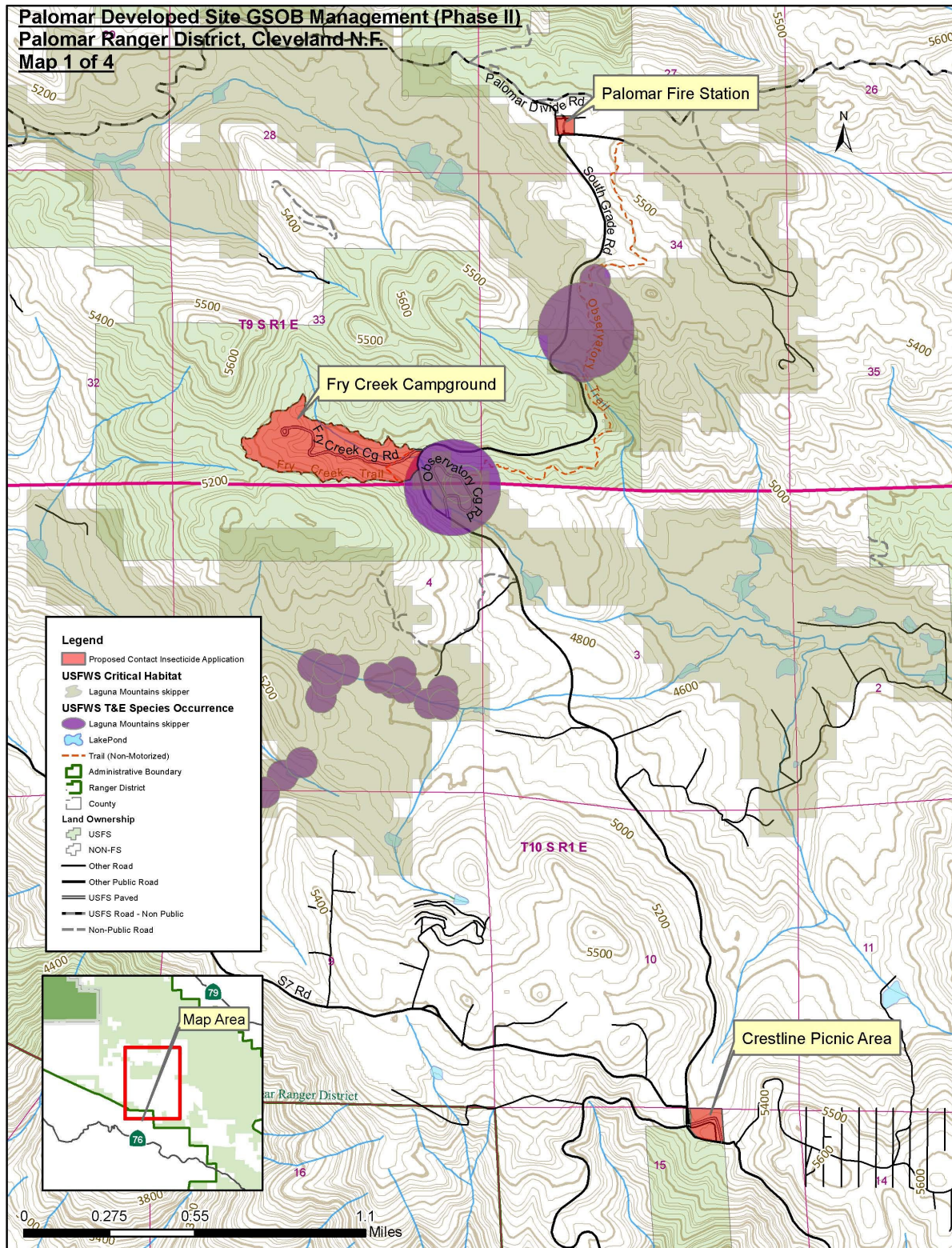


Figure 2: San Luis Rey Picnic Area, and Henshaw Overlook Treatment Areas

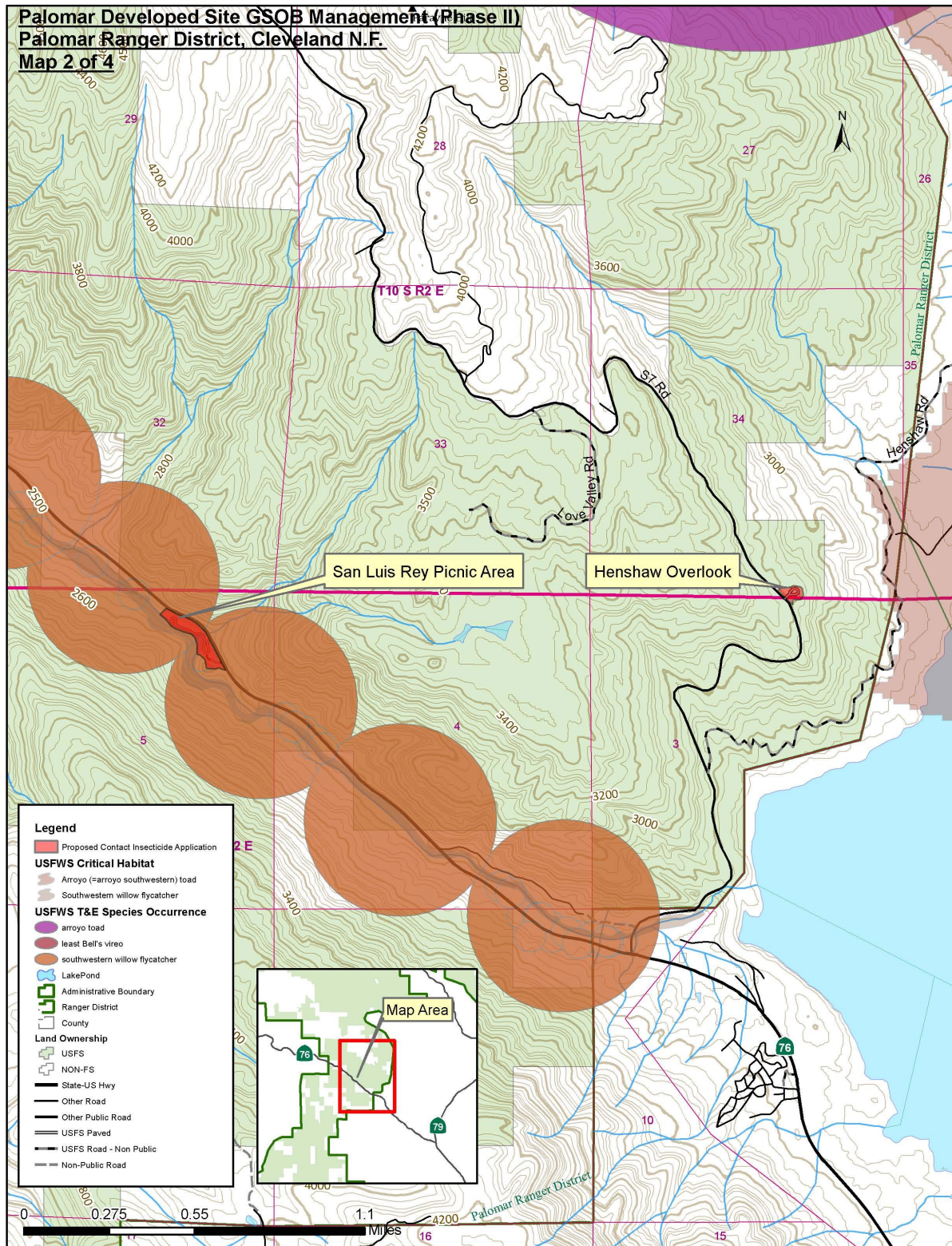


Figure 3: Ataxam mamta'ash Campground Treatment Area

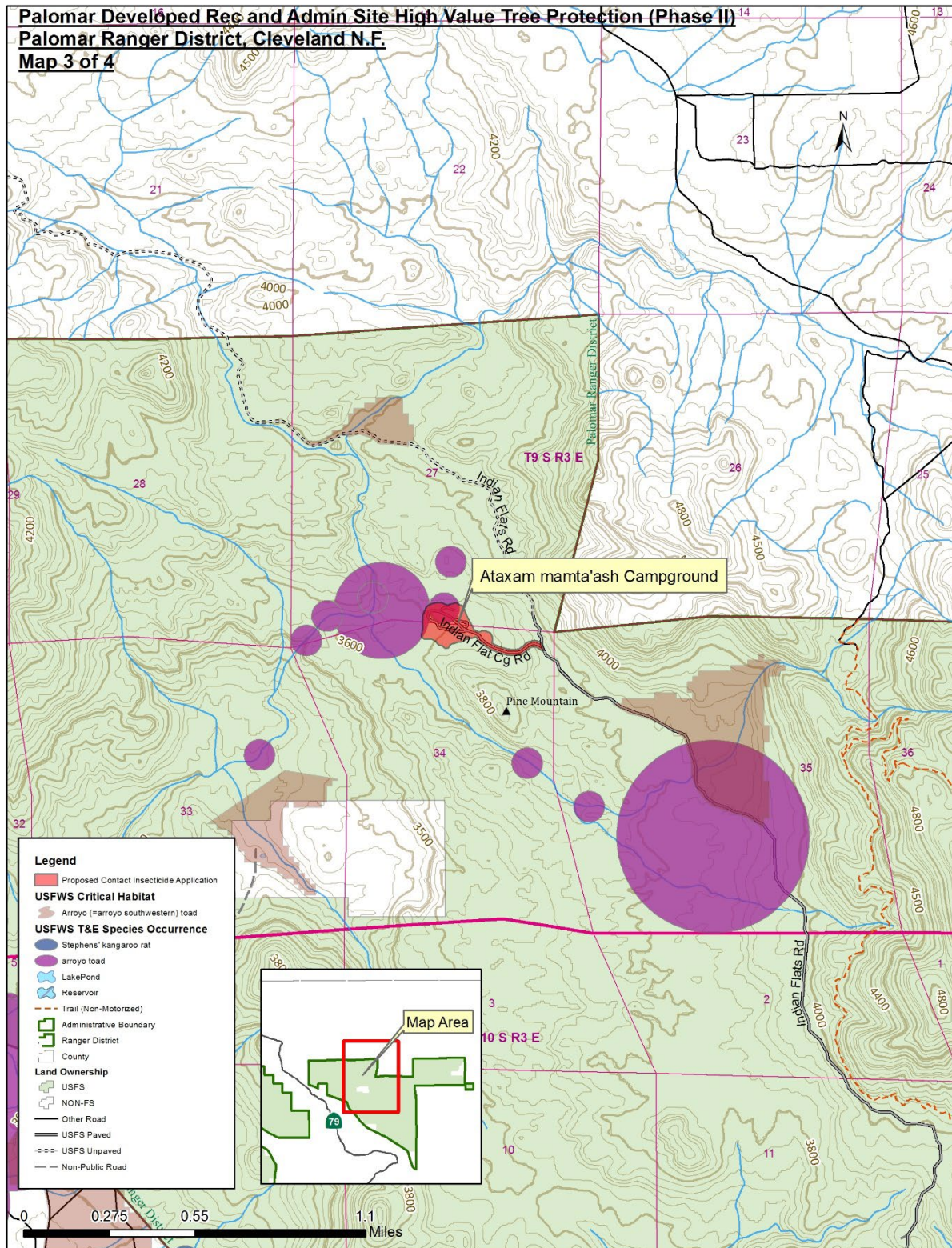
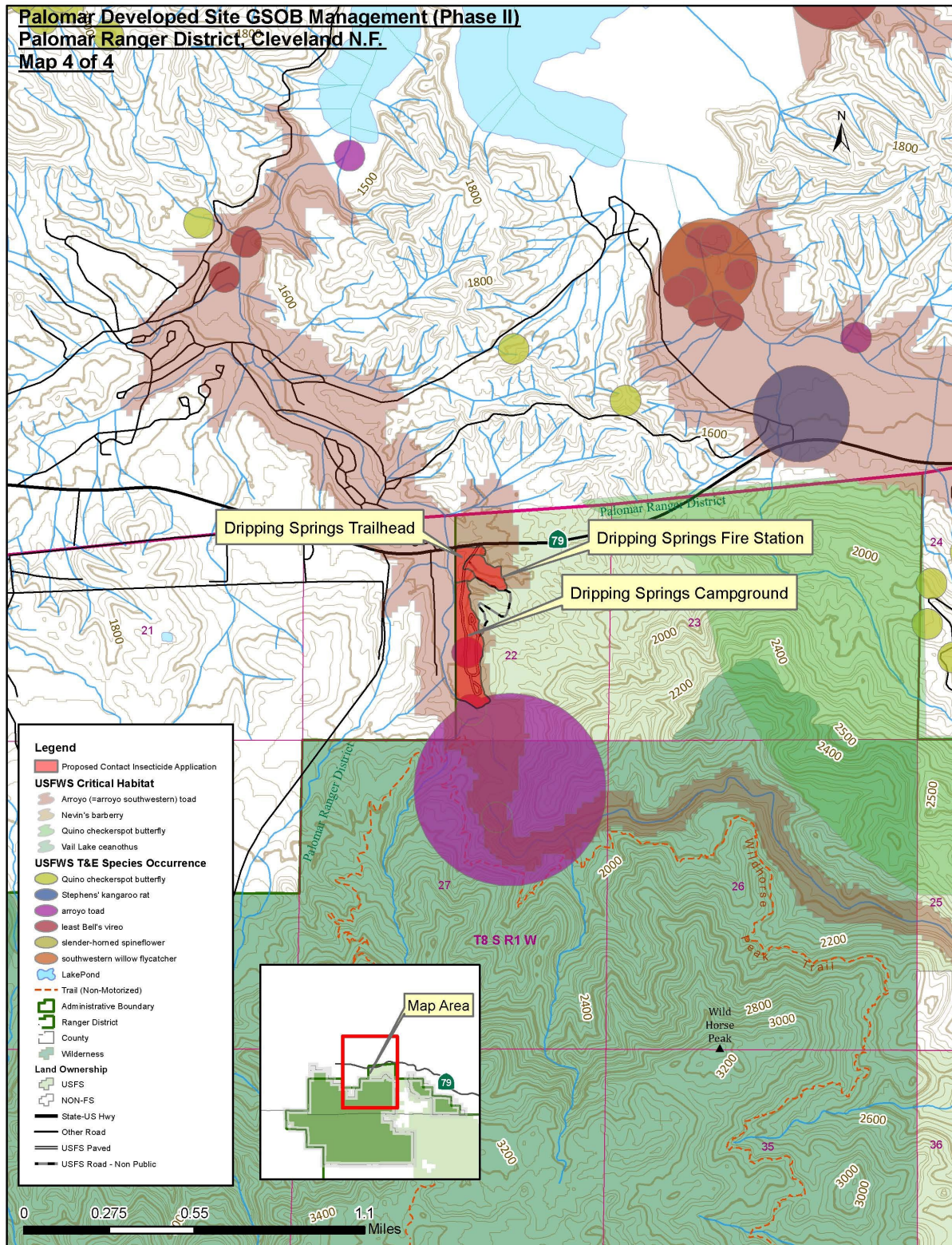


Figure 4: Dripping Springs Trailhead, Campground and Fire Station Treatment Areas





Project Screening

Legal and Regulatory Considerations

Given the nature of the project, the responsible official requested documentation to demonstrate compliance with the following legal and regulatory considerations in addition to NEPA:

- | | |
|---|--|
| ☒ NFMA/Land Management Plan | ☒ Pertinent Executive Orders |
| ☒ Endangered Species Act (ESA) | <u>Other Land Use Designations:</u> |
| ☒ Sensitive Species (FSM 2670) | ☒ Riparian Conservation Area (RCA) |
| ☒ National Historic Preservation Act (NHPA) | ☒ Special Interest Areas (SIA) |
| ☒ Tribal Consultation | |
| ☒ Clean Water Act (CWA) | |

Agencies, Organizations and Persons Contacted

Given the nature of the project, the responsible official requested the following agencies, organizations and/or persons be contacted to provide input to, or to be made aware of, the project. A brief overview of feedback or comments received is included.

The project was published on the Status of Proposed Actions (SOPA) on 2 February, 2023. In addition several Tribes were notified (see Consultation with Federally Recognized Tribes section of this document). No comments from the public were received.

US Fish and Wildlife Service was contacted through the informal consultation process of Section 7 of the Endangered Species Act.

Supporting Project Documentation

Table 1. Applicable project file documentation to support analysis

Documentation Type	File Name (if applicable/needed)
Informal Consultation Concurrence Letter USFWS	23-0045052_S7-I-CNF Carbaryl Application
Hydrology/Soils Report	Palomar Developed Site GSOB Management Project (Phase 2)_Hydro Report
Human Health Risk Assessment – report and SERA worksheet	CNF Palomar Phase 2 GSOB_HHRA_Final
Sec. 106 Screened Undertaking	Tracking Number R202305023B007



Environmental Analysis Review: How would our management actions affect the environment?

National Forest Management Act (NFMA) - Land Management Plan Consistency

This decision is consistent with the Cleveland National Forest Land Management Plan of 2006. The project was designed in conformance with the Aquanga Place, San Dieguito-Black Mountain, and Palomar Mountain, as well as guidance for allowed activities in Back Country and Developed Area Interface land use zones described in the plan.

The project meets the intent of the Places' desired conditions and program emphasis by preserving key landscape attributes, (i.e. oaks) and maintaining the scenic integrity, natural appearing landscape in addition to enhancing community protection through the prevention of GSOB induced oak mortality that would ultimately result in an increase of dead/dying oak trees on the landscape that would result in increased hazard fuels adjacent to communities.

Other Law, Regulation and Policy Consistency

Endangered Species Act

Threatened, Endangered, Proposed and Candidate Species and Critical Habitat

The pertinent specialists reviewed the proposed action and made the following determinations for threatened, endangered and/or proposed species:

Table 2. Threatened, endangered, proposed or candidate species and critical habitat effect determinations

Species/Habitat	Status	Proposed or Designated Critical Habitat Present?	Determination	Brief Rationale (or refer to other project documentation)
Arroyo Toad (<i>Anaxyrus californicus</i>)	Endangered	Yes	NLAA	See BA
Least Bell's Vireo (<i>Vireo bellii pusillus</i>)	Endangered	No	NLAA	See BA
Southwestern Willow Flycatcher (<i>Empidonax traillii extimus</i>)	Endangered	Yes	NLAA	See BA
Laguna Mountain Skipper (<i>Pyrgus ruralis lagunae</i>)	Endangered	Yes	NLAA	See BA

NE – no effect; **NLAA** – may affect, not likely to adversely affect; **LAA** – may affect, likely to adversely affect; **No Jeopardy** – not likely to jeopardize the continued existence or adversely modify critical habitat



Supporting Project Documentation**Table 3. Applicable project file documentation to support analysis**

Documentation Type	File Name (if applicable/needed)
Informal Consultation Initiation	CNF Consultation Carbaryl 2023
Email modification to Consultation	GSOB BA_Update email to FWS
Informal Consultation Concurrence Letter USFWS	23-0045052_S7-I-CNF Carbaryl Application

Sensitive Species (FSM 2670)

The pertinent specialists reviewed the proposed action and made the following determinations for sensitive species:

Forest Biologist, Kirsten Winter determined that the scope and scale of project not expected to affect sensitive species

National Historic Preservation Act – Section 106 Review

The pertinent specialist has reviewed the proposed action and made the following determination regarding Section 106 compliance:

Section 106 review meets compliance stipulations of a Programmatic Agreement (see comments section).

Comments

The annual treatment of oak trees is considered a Class B Screened undertaking under the R5 PA as stipulated in Appendix D, Stipulation 2.3, subheading (g).

Exemption Category (Appendix D Stipulation 2.3):

(g) Applications of pesticides, biocontrol agents, or herbicides that do not have the potential to affect access to or use of resources by Indians based on the nature of the undertaking or prior or current consultation with Indian tribes; Projects requiring class II or III Standard Protection Measures (i.e., protections other than avoidance; see AppendixE) or other conditions for the protection and preservation of historic properties may not use the streamlined documentation procedures for Screened Undertakings. (Appendix D, Stipulation 2.1)

The application of Carbaryl insecticide, when conducted as described by a state-licensed professional with oversight by a Forest Service contract inspector, does not present significant risk of impact to historic properties and the application restrictions can be characterized as “Class 1: avoidance”. By posting signs informing the public of recent insecticide treatment and by providing annual notice to Tribes when pesticide application is planned, the proposed actions do not limit access to or restrict the use of resources gathered by Indian Tribes. Should the Forest Service contract inspector encounter unanticipated cultural materials or perceive impact to known cultural resources in the process of completing the proposed work they are instructed to stop treatment in that area and contact heritage staff.

**Supporting Project Documentation****Table 4. Applicable project file documentation to support analysis**

Documentation Type	File Name (if applicable/needed)
Sec. 106 Screened Undertaking	Tracking Number R202305023B007

Consultation with Federally Recognized Tribes

Consultation with federally recognized tribes was conducted as follows:

CNF sent a letter to tribal contacts on February 23rd, 2023, providing project information and seeking feedback on the proposed action. The following Tribes were consulted by email:

- Barona Band of Mission Indians
- Cahuilla Band of Indians
- Campo Band of Mission Indians
- Ewiiapaayp Band of Kumeyaay Indians
- Lipay Nation of Santa Ysabel
- Inaja-Cosmit Band of Indians
- Jamul Indian Village
- Juaneño Band of Mission Indians Acjachemen Nation
- La Jolla Band of Luiseño Indians
- La Posta Band of Mission Indians
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Manzanita Band of the Kumeyaay Nation
- Mesa Grande Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Ramona Band of Cahuilla
- Rincon Band of Luiseño Indians
- San Luis Rey Band of Mission Indians
- San Pasqual Band of Diegueno Indians of California
- Soboba Band of Luiseño Indians
- Sycuan Band of the Kumeyaay Nation
- Viejas Band of Kumeyaay Indians

The letter was also sent by email to contacts at the Kumeyaay Cultural Repatriation Committee (KCRC), the California Indian Basketweavers Association, and the Southern California Tribal Chairmen's Association.

No comments were received in the 30-day period. Tribes are free to comment at any point during the implementation process. Previously when CNF has consulted with Tribes on GSOB management at developed sites, Tribes have commented favorably on treatment design and agree that GSOB should be managed with intention. CNF hosted a meeting on October 26th, 2018, where Forest leadership met with Rincon Tribal Historic Preservation Officer Destiny Colocho to discuss a similar treatment design implemented on the Trabuco Ranger District (R2018050220022). The meeting was regarded positively, and a collaborative attitude was felt between governments aligned against a common foe. Collaboration and coordination with additional Tribes, Bands and Nations (La Jolla, Campo, La Posta, etc.) regarding the treatment of GSOB has been ongoing. Notifications to all interested Tribes, Bands and Nations regarding chemical applications for treating GSOB infestations at other locations across the Cleveland have been provided consistently without objection since 2017.



Supporting Project Documentation

Table 5. Applicable project file documentation to support analysis

Documentation Type	File Name (if applicable/needed)
Tribal Notification Letter	Tribal Initiation Letter_GSOB Phase II

Other Land Use Designations

The pertinent specialist has reviewed the proposed action and made the following determinations based on the presence, proximity, or lack of other land use designations:

Table 12. Other land use area compliance determinations

Other Land Use Designation Type	Applicable Law / Regulation to Demonstrate Compliance With	Rationale for Compliance
Special Interest Areas	Land Management Plan	A portion of the Ataxam mamta'ash Campground Site is within the Pine Mountain Special Interest Area.
Riparian Conservation Areas	Land Management Plan	Hydrology/Soils report found project is compliant with RCA protection.

Supporting Project Documentation

Table 13. Applicable project file documentation to support analysis

Documentation Type	File Name (if applicable/needed)
Hydrology/Soils Report	Palomar Developed Site GSOB Management Project (Phase 2)_Hydro Report

Clean Water Act

The pertinent specialist has reviewed the proposed action and made the following determination:

Our analysis found that treatments within project locations will not have detrimental impacts to soil, waterways, or riparian resources. We believe that treatments will have beneficial impacts on resources and overall watershed function by protecting oak trees that are important to local ecosystems. It is important that all design features suggested in this document are used appropriately and implemented with guidance from forest watershed specialist.

Supporting Project Documentation

Table 14. Applicable project file documentation to support analysis

Documentation Type	File Name (if applicable/needed)
Hydrology/Soils Report	Palomar Developed Site GSOB Management Project (Phase 2)_Hydro Report



NEPA: Extraordinary Circumstance Determinations

Pertinent specialists have reviewed the proposed action and made the following determinations with regards to degree of potential effects for the resource conditions considered:

Table 16. Resource conditions considered for extraordinary circumstance determinations

Resource Conditions Considered for Extraordinary Circumstances	Is there a degree of potential effect that raises uncertainty over its significance? Briefly explain.
Federally listed threatened or endangered species, designated critical habitat, and Forest Service sensitive species	Botany: NO, there is no uncertainty Rationale for yes/no: No T/E Plant Species or FS Sensitive Species present in the Project Area Fisheries: N/A, not present Wildlife: NO, there is no uncertainty Rationale for yes/no: Informal consultation with FWS determined that the project is not likely to adversely affect the four T/E species that are likely to be present within the project footprint. Therefore, there is no uncertainty regarding the impacts to federally listed threatened or endangered species, designated critical habitat, and Forest Service sensitive species
Floodplains, wetlands, or municipal watersheds	NO, there is no uncertainty Rationale for yes/no: Project does not impact floodplain hydrology.
Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas	N/A, not present
Inventoried roadless areas	N/A, not present
Research natural areas	N/A, not present
American Indians and Alaska Native religious or cultural sites	NO, there is no uncertainty Rationale for yes/no: No impact was found to tribal religious or cultural sites. y
Archaeological sites, or historic properties or areas	NO, there is no uncertainty Rationale for yes/no: Project is non-ground disturbing and does not threaten archeological sites or historic properties.

Supporting Project Documentation

Table 17. Applicable project file documentation to support analysis

Documentation Type	File Name (if applicable/needed)
Informal Consultation Initiation	CNF Consultation Carbaryl 2023
Informal Consultation Concurrence Letter USFWS	23-0045052_S7-I-CNF Carbaryl Application



Documentation Type	File Name (if applicable/needed)
Hydrology/Soils Report	Palomar Developed Site GSOB Management Project (Phase 2)_Hydro Report
Human Health Risk Assessment – report and SERA worksheet	CNF Palomar Phase 2 GSOB_HHRA_Final
Sec. 106 Screened Undertaking	Tracking Number R202305023B007

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