

## **AVOIDANCE, MINIMIZATION AND MITIGATION MEASURES**

### ***CEQA Considerations***

Less than significant impacts to Valley oak riparian habitat, wetlands, and other waters of the U.S., and GGS pursuant to CEQA are anticipated. Because the impacts to these resources are less than significant, no mitigation measures are required under CEQA. However, mitigation will be required under the Section 1602 CDFG permit to compensate for the loss of riparian habitat, under the Section 404 USACE permit to compensate for the loss of wetlands and other waters of the U.S., and under the Biological Opinion to compensate for the loss of GGS habitat.

### **Farmland Equipment**

#### ***Avoidance and Minimization Measures***

- Consideration will be given to placing warning signs for slow moving farm equipment.

### **Relocations**

#### ***Avoidance and Minimization Measures***

- Following project approval, Caltrans R/W Department would coordinate with affected property owners concerning compensation for loss of property.
- A Relocation Agent would contact all displacees after final environmental approval. The Relocation Agent would ensure that eligible displacees receive their full relocation benefits, including advisory assistance, and that all activities will be conducted in accordance the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Relocation resources shall be available to all displacees free of discrimination. At the time of the first written offer to purchase, owner occupants are given a detailed explanation of Caltrans' Relocation Program and Services.

### **Utilities/Emergency Services**

#### ***Avoidance and Minimization Measures***

All emergency response units in the project area would be notified of the project construction schedule and would have access to SR 16 throughout the construction period.

### **Traffic and Transportation/Pedestrian and Bicycle Facilities**

#### ***Avoidance and Minimization Measures***

- During final design, consideration will be given to placing gaps in the rumble strips for bicycle maneuverability
- Traffic handling charts and specifications will be incorporated into the project during the design phase that will be included as part of the Contractor's specification package in order to manage temporary construction delays. Traffic Management elements that should be considered are:
  - ❖ Restrictions on when lanes may be closed
  - ❖ Public notices and press releases provided in local newspapers before major stage or traffic shifts

- ❖ A Construction Zone Enhanced Enforcement Program (COZEEP) with the CHP during major construction that affects traffic, such as stage changes and traffic shifts
- ❖ Changeable message signs to alert motorists to unusual or new conditions and any delays that develop
- ❖ Any other pertinent issues as they may develop
- ❖ Bus routes, special events at the Cache Creek Casino Resort, the Davis Double Century, and the Capay Valley Almond Festival.

## **Visual/Aesthetics**

### ***Avoidance and Minimization Measures***

- Slope Treatment: Where appropriate, new fill slopes would be 4:1 or less. Slopes would be designed for gradual grade transitions (slope rounding) at hinge and catch points of earthwork slopes, as well as flatter slopes where applicable, so as to reduce soil erosion potential and create a more natural appearing topography. The existing grade would be preserved within the drip lines of the trees that are to remain, so root systems would not be affected by cut or fill earthwork.
- Bridge Rails: If feasible the new bridge crash-rail would be an “open” rail type to facilitate views to the surrounding landscape. (See Figure 3)
- Erosion Control: California native grasses would be applied at all locations with exposed soil and steep slopes, to prevent soil erosion, reduce water pollution, and help preserve the rural and natural landscape character.
- Aesthetic Treatments: Aesthetic treatments (materials, pattern, texture, color) would be implemented where feasible on any retaining walls, barriers, crash-rails, and construction elements.
- During final design efforts will be made to preserve as much vegetation as feasible. Consideration will be given to protecting stands of trees close to the edge of the CRZ with guard rail.

### ***Mitigation Measures***

- Revegetation Plan (RP): A draft RP has been prepared that will be finalized following final design. The RP would be used by Caltrans staff to direct revegetation efforts. Mitigation funds have been set aside and would be used to perform the required planting after project construction. The RP serves to mitigate for both visual and biological impacts and will be jointly prepared by a landscape architect and biologist. The RP would include measures to replace any existing native trees that are removed or indirectly affected by construction of the proposed project. The RP would include planting and irrigation plans and specifications, riparian restoration plans, wetland planting plans, plant species, sizes and quantities, planted screening for residences to reduce light and glare, grading, monitoring, success criteria and remedial actions. Re-vegetation within clear recovery zones would consist of native grasses and shrubs to facilitate sight distance requirements, reduction of obstacles and erosion concerns.

## **Cultural Resources**

### ***Avoidance, Minimization, and Mitigation Measures***

On June 28, 2006, the FHWA, the SHPO, and Caltrans signed a Memorandum of Agreement (MOA), which included measures to protect and mitigate impacts to cultural

resources (see Appendix H). Due to the revised finding of “No Adverse Effect” for the Taber’s Corner Historic District, no mitigation would be required for that property, and the mitigation measures initially required in the MOA relating to Taber’s Corner are no longer necessary. Mitigation for the adverse effect to CA-YOL-125/H would be required and would be implemented, in accordance with the terms of the MOA.

In addition to the MOA, the following avoidance and minimization measures would be implemented during project construction:

- If cultural materials were discovered during construction, all earth-moving activity within and around the immediate discovery area would be diverted until a qualified archaeologist can assess the nature and significance of the find.
- A specification or special provision for handling archaeological discoveries during construction will be included in the Contractor’s specifications.
- An ESA (Environmentally Sensitive Area) action plan would be prepared to protect resources that are considered eligible for the purposes of this undertaking during construction. No work within the protected sites would be allowed.

### **Hydrology and Floodplain**

#### ***Avoidance and Minimization Measures***

SR 16 would be raised above the 100-year floodplain. In addition, a flood improvement project has been developed in cooperation with Yolo County in an effort to aide the county in reducing the flooding in Madison. After raising SR 16 above the 100-year floodplain, the highway embankment would redirect flood flows around the north of Madison. Madison would continue to be susceptible to flooding from the south and west; however, many flood events would be less severe. In addition to raising the level of SR 16, the canal network would be improved to accommodate flood flows and easements would be purchased for adjacent farmland to detain flood flows and provide for slow release into existing channels.

### **Water Quality and Storm Water Runoff**

#### ***Avoidance and Minimization Measures***

The Contractor will be responsible for implementing stormwater BMPs pursuant to the General Construction Permit and the SWPPP required by the permit to ensure that erosion and run-off does not contribute to additional pollutants in surface water bodies in the vicinity of this project. Implementing aggressive BMPs will minimize soil transportation during construction. Aggressive and redundant placement of BMPs in areas that are tributaries to Cache Creek, especially at creek crossings, or in areas with elevated levels of mercury will provide additional protection.

No soil disturbing work will be performed during the wet season (October 15 – April 15). This will reduce the likelihood of discharges from the site.

This will be a multi-year project and it will be necessary to ensure that BMPs have been fully implemented during the wet season to stabilize slopes and prevent erosion, especially in the vicinity of surface water bodies.

Clearing and grubbing (digging up roots and stumps) will be done in the dry months of the year (April 15<sup>th</sup> – October 15<sup>th</sup>) to reduce the likelihood of erosion occurring during and immediately following construction of the project. Revegetation of disturbed surfaces will be in accordance with plans developed by a Caltrans Landscape Architect. Preservation of existing vegetation to provide erosion and sediment control benefits has been maximized on this project. Contract plans will delineate Environmental Sensitive Areas (ESAs) to help preserve existing vegetation.

The placement of Rock Slope Protection (RSP) to currently unstable slopes, as well as the addition of detention basins, swales, and other stormwater design improvements are being implemented into this project to ultimately improve the water quality of the creeks within the project limits.

Adherence to the following is recommended to ensure compliance with the terms of the Caltrans MS4 NPDES Permit (Order No. 99-06-DWQ) and to prevent receiving water pollution as a result of construction activities and/or operation of this section of SR 16.

- The project shall adhere to the conditions of the Caltrans Statewide NPDES Permit CAS # 000003, (Order # 99-06-DWQ), issued by the State Water Resources Control Board.
- The Contractor is required to prepare a SWPPP containing effective erosion and sediment control measures. These measures must address soil stabilization practices, sediment control practices, tracking control practices, and wind erosion control practices. In addition, the project plan must include non-storm water controls, waste management, and material pollution controls. It is generally accepted that practices that perform well by themselves can be complemented by other practices to raise the collective level of erosion control effectiveness and sediment retention.
- This project will have at least 1 acre of Disturbed Soil Area (DSA) and is subject to the Construction General Permit. A Notification of Construction (NOC) will be submitted to Central Valley Regional Water Quality Control Board (CVRWQCB), Sacramento Office at least 30 days prior to construction.
- Standard Special Provision (SSP) 07-345 is a set of specifications used for projects that disturb more than one acre of soil. SSP 07-345 would be included in the construction specifications for this project and would clearly outline the Contractor's responsibilities with respect to preparation and implementation of the SWPPP.
- In accordance with the MS4 NPDES general permit as directed by Caltrans' Storm Water Management Plan (SWMP) and the Project Planning and Design Guide (PPDG) an evaluation of the project using the most recent approved evaluation guide is essential in determining if the incorporation of permanent storm water runoff treatment measures shall be considered for this project. This evaluation has been conducted through the completion of a Storm Water Data Report (SWDR).
- The project is proposing to widen the existing channel bottom of the South Fork Willow Slough to provide attenuation for peak discharges. This work may require the dewatering of this irrigation ditch. Irrigation water is a conditionally exempted discharge under the Caltrans permit and is not prohibited if identified as not being sources of pollutants to receiving waters or if appropriate control measures are developed and implemented under the SWMP to minimize the adverse impacts of such sources. The project will coordinate with CVRWQCB through the Caltrans NPDES coordinator to ensure any dewatering performed during this project conforms to these (NPDES permit) provisions.

- The project will utilize and enhance existing natural biostrips and bioswales whenever possible. Biostrips will be incorporated into the roadway design throughout the project limits wherever gentle slopes allow. Bioswales will be incorporated into ditch design wherever the longitudinal slope, soil conditions, proper shape, and vegetation can be obtained.
- Caltrans will comply with all conditions listed in the 401 Certification.

### **Hazardous Waste/Materials**

#### ***Avoidance and Minimization Measures***

- Traffic markings that are going to be removed from the adjacent pavement would have the levels of lead and chromium tested for determining proper disposal methods.
- Testing for asbestos, heavy metal contamination and ADL would be performed as appropriate.
- Any R/W that is going to be acquired would be evaluated for potential soil contamination. Soils with non-hazardous levels of ADL may be reused within the project limits. Soils with hazardous levels of ADL would be disposed of at an appropriate landfill.
- A Hazardous Substances Disclosure Document (HSDD) would be required for attachment to a Certificate of Sufficiency (COS) before new R/W can be acquired.
- The Contractor's package would include a lead compliance plan and any specifications necessary for handling hazardous materials.

### **Air Quality**

#### ***Avoidance and Minimization Measures***

- Caltrans Standard Specifications require contractors to use Best Management Practice (BMP) to effectively reduce and control emission impacts during construction. The provisions of Section 14-9 of the Caltrans Standard Specifications, Air Pollution Control, require the Contractor to comply with all pertinent rules, regulations, ordinances, and statutes of the local air district.

### **Noise**

#### ***Avoidance and Minimization Measures***

- Caltrans Standard Specifications require contractors to use Best Management Practice (BMP) to effectively reduce and control emission impacts during construction. The provisions of Section 14-8 of the Caltrans Standard Specifications, Noise Control, require the Contractor to comply with all pertinent rules, regulations, ordinances, and statutes of the local air district.

### **Oak Woodlands**

#### ***Avoidance and Minimization Measures***

- Areas of blue oak woodland habitat within the project area would be designated as environmentally sensitive areas (ESAs) on the project plans and in the project specifications. The boundaries of the ESA would be clearly marked in the field by the installation of a temporary fence. ESAs would be implemented as a first order of work and would remain in place until all construction activities are complete.

- Removal of native vegetation would be confined to the minimal area necessary to facilitate construction activities.
- After completion of construction activities, temporarily disturbed areas would be re-contoured to the natural grade and re-vegetated with native species appropriate for the site conditions. Erosion control straw and hydro-seed mulch must be obtained from a certified weed-free provider.

### **Valley Oak Riparian Habitat**

#### ***Avoidance and Minimization Measures***

- A CDFG Section 1602 Streambed Alteration Agreement for impacts to riparian habitat would be obtained prior to construction.
- Areas of Valley oak riparian habitat within the project area that are not directly affected would be designated as ESAs on the project plans and in the project specifications. The boundaries of the ESA will be clearly marked in the field by the installation of a temporary fence. ESAs will be implemented as a first order of work and will remain in place until all construction activities are complete.
- Removal of native vegetation would be confined to the minimal area necessary to facilitate construction activities.

#### ***Mitigation***

- Upon completion of project construction, the loss of 191 Valley oak trees would be compensated for on-site within Caltrans R/W. Disturbed areas would be re-contoured to the natural grade and re-vegetated with Valley oak seedlings and other native species appropriate for the site conditions.

### **Wildlife Corridors**

#### ***Avoidance and Minimization Measures***

- Rock slope protection is difficult for deer and amphibians to travel across and should not be placed in front of or on the slopes adjacent to a wildlife crossing. Where feasible, rock slope protection would need to be buried or back-filled with topsoil, and planted/reinforced with native vegetation.

### **Wetlands and Other Waters**

#### ***Avoidance and Minimization Measures***

- All permit conditions would be adhered to.
- Wetlands and other waters of the U.S. will be delineated as ESAs on the project plans and in the project specifications. The boundaries of the ESA will be clearly marked in the field by the installation of a temporary fence. ESAs will be implemented as a first order of work and will remain in place until all construction activities are complete.
- The Contractor would be required to prepare a SWPPP (see Water Quality section).

### ***Mitigation***

Compensation for jurisdictional wetlands and other waters of the U.S. will be performed to achieve no-net-loss of the functions and values within the study area in accordance with USACE policy stated in the Sacramento District's 2008 Habitat Mitigation and Monitoring Proposal Guidelines, which can be found at the following website:

<http://www.spl.usace.army.mil/co/regulatory/habmitmon.html>.

- The proposed project would permanently impact 0.02 acre of jurisdictional wetlands which will be compensated for on-site at a 1:1 ratio by creating wetlands in Segment 6 as part of the flood improvement partnership (see Appendix O & P for a map of the flood improvements and for a proposed wetland planting scenario) or offsite pending consultation with USACE. Indirect effects to 0.03 acre of jurisdictional wetlands of the U.S. would be compensated for on-site at a 1:1 ratio by restoring wetlands in Segment 6 as part of the flood improvement partnership or offsite pending consultation with USACE.
- The proposed project would directly impact 1.02 acres of jurisdictional other Waters of the U.S., which would be compensated for on-site at a 1:1 ratio by creating vegetated buffers along the affected waterways in the study area. Temporary disturbance to 0.91 acre of jurisdictional other Waters of the U.S. would be compensated for on-site at a 1:1 ratio by restoring vegetated buffers along disturbed waterways in Segment 6.

### **Northwestern Pond Turtle**

#### ***Avoidance and Minimization Measures***

- Before the initiation of any vegetation removal, grading, or any other ground-disturbing activities, a qualified biologist will conduct mandatory worker awareness training for all construction personnel. The awareness training will provide information on how to avoid impacts to the northwestern pond turtle.
- Pre-construction surveys for sensitive amphibians and reptiles would be conducted by a qualified biologist less than 48 hours prior to the commencement of site disturbance. If amphibians or reptiles are detected in the project area, they will be relocated to a suitable reach of creek upstream or downstream of the project.
- Prior to construction, silt fencing or equivalent will be installed parallel to the creek to prevent the movement of amphibians or reptiles from waters onto the project site. The fencing will be checked and maintained weekly to ensure that no gaps develop through which amphibians or reptiles could pass. The fencing would be removed after project construction.

### **Migratory Birds & Bats-Vegetation Nesting Species**

#### ***Avoidance and Minimization Measures***

- Removal of native vegetation would be confined to the minimal area necessary to facilitate construction activities.
- Vegetation removal on the project site would be conducted between September 1 and February 14, outside of the nesting season (generally) for most migratory bird species in the project area. If vegetation removal must take place outside of this period, a qualified biologist will conduct pre-construction surveys for active bird nests within 0.25 mile of all construction activities. These surveys will be conducted no less than 14 days and no more than 30 days before the beginning of construction. If

construction activities are delayed or suspended for more than 30 days after the pre-construction survey, the areas will be resurveyed. If no active bird nests are found, no further measures are necessary. If active bird nests are identified, construction activities within 500 ft of these areas will be postponed until USFWS and/or CDFG have been consulted, or after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site. No known active nests would be disturbed without permit or other authorization from the USFWS and/or the CDFG.

### **Migratory Birds & Bats-Structure Nesting/Roosting Species**

#### ***Avoidance and Minimization Measures***

- To avoid potential impacts to nesting swallows or roosting bats, exclusionary devices would be installed where feasible to prevent nesting or roosting on box culverts and bridges within the project area. The installation of the exclusionary devices would occur during the fall or winter after fledging and before initiation of breeding activities (between September 1 and February 14). A biological monitor would periodically inspect the exclusionary netting to ensure its effectiveness.
- Nest removal during the swallow nesting season (February 15 to September 1) may also be used to prevent structure nesting/roosting. Old nests or nests under construction would be washed down with water or knocked down with a pole. Swallows are strongly attracted to old nests or to the remnants of deteriorated nests, so all traces of mud would need to be removed. Because cliff swallows persistently rebuild nests for most of the breeding season, the nest removal method would require many consecutive days to prevent them from nesting using this method.

### **Valley Elderberry Longhorn Beetle**

#### ***Avoidance and Minimization Measures***

- All conditions of the Biological Opinion (BO) would be adhered to.
- Before initiation of any vegetation removal, grading, or any other ground-disturbing activities, a qualified biologist would conduct mandatory worker awareness training for all construction personnel. The awareness training would provide information on how to avoid impacts to biological resources, particularly special-status species. The training would also inform workers of the penalties for not complying with mitigation requirements. If new construction personnel are subsequently added to the project, they too would receive the training.
- Prior to any ground-disturbing activities associated with the project, ESA fencing (4-ft tall temporary, plastic mesh construction fence) would be installed, where possible, 20 ft from the driplines of elderberry shrubs that are not being removed. The fencing is intended to prevent encroachment by construction vehicles and personnel. The exact location of the fencing will be determined by a qualified biologist, with the goal of protecting VELB habitat. The fencing would be strung tightly on posts set at a maximum interval of 10 ft. The fencing would be installed in a way that prevents equipment from enlarging the work area beyond what is necessary to complete the work. The fencing would be checked and maintained weekly until all construction is completed.
- A sign would mark this buffer zone and state the following, "This is habitat of the valley elderberry longhorn beetle, a threatened species, and must not be disturbed. This species is protected by the Endangered Species Act of 1973, as amended."

Violators are subject to prosecution, fines and imprisonment.” The fencing and a note reflecting this condition would be shown on the construction plans. Signs would be legible from a distance of 20 ft and must be maintained for the duration of construction.

- Prior to any ground disturbances, Caltrans would ensure that all elderberry shrubs with one or more stems measuring one-inch or more in diameter that cannot be avoided during construction will be transplanted to an approved conservation area in accordance with Conservation Guidelines for Valley Elderberry Longhorn Beetle (USFWS 1999).

### ***Mitigation***

Caltrans would purchase credits sufficient to compensate for the transplanting of the 21 elderberry shrubs and planting of 312 elderberry shrub seedlings and 486 associated native plantings from a USFWS approved conservation bank that services the proposed project area.

### **Giant Garter Snake**

#### ***Avoidance and Minimization Measures***

- All conditions of the BO and 2081 permit would be adhered to.
- Construction activity within suitable habitat would be conducted between May 1 and October 1 to minimize impacts to this species. This is the active period for GGS and thus direct mortality is lessened because snakes are expected to actively move and avoid danger.
- Clearing would be confined to the minimal area necessary to facilitate construction activities. Areas of GGS habitat within or adjacent to the project area that were avoided would be designated as an ESA.
- Construction personnel would receive USFWS-approved worker environmental awareness training. This training instructs workers to recognize giant garter snakes and their habitat(s).
- Twenty-four hours prior to construction activities, the project area would be surveyed for GGS. Surveys of the project area would be repeated if a two-week or greater lapse in construction activity occurs. If a GGS is encountered during construction, activities would cease until appropriate corrective measures have been completed or it has been determined that the giant garter snake would not be harmed. Any sightings and any incidental take would be reported to the USFWS immediately.
- Any dewatered habitat should remain dry for at least 15 consecutive days after April 15 and prior to excavating or filling of the dewatered habitat.
- After completion of construction activities, any temporary fill and construction debris would be removed and, wherever feasible, disturbed areas restored to pre-project conditions. Restoration work may include such activities as replanting species removed from banks or replanting emergent vegetation in the active channel.

### ***Mitigation***

- Level 1 Effects: Caltrans would restore all 4.4 acres of GGS habitat through the onsite relocation, slope improvement, and revegetation of South Fork Willow Slough. In addition, a one-year monitoring report showing pre- and post-project area photos would be submitted to USFWS one year from the restoration implementation. The restoration and monitoring would follow USFWS Guidelines. If the restoration is unsuccessful, as determined by USFWS, consultation shall be reinitiated and would

include the appropriate actions necessary to fulfill the success criteria for restoration of temporary disturbance.

- Level 3 Effects: Prior to the start of any ground-disturbing activities associated with the proposed project, Caltrans would compensate for the loss of the 0.7 acre of aquatic snake habitat (the agricultural drainage ditch) by the following measures: (1) the 0.7 acre of agricultural ditch would be replaced with 0.7 acre of agricultural drainage ditch onsite (a 1:1 ratio); and (2) prior to ground disturbing activities at the proposed project site, credits sufficient to preserve 1.4 acres of snake habitat would be purchased at a USFWS/CDFG approved conservation bank that services the proposed project area (a 2:1 ratio).

### **Swainson's Hawk**

#### ***Avoidance and Minimization Measures***

- Known nest trees within the project limits would be designated as ESAs and would be delineated on the project plans and in the project specifications. The boundaries of the ESA would be clearly marked in the field by the installation of a temporary fence. ESAs would be implemented as a first order of work and would remain in place until all construction activities are complete.
- Before initiation of any vegetation removal, grading, or any other ground-disturbing activities, a qualified biologist would conduct mandatory worker awareness training for all construction personnel. The awareness training would provide information on how to avoid impacts to biological resources, particularly special-status species. The training would also inform workers of the penalties for not complying with mitigation requirements. If new construction personnel are subsequently added to the project, they too would receive the training.
- Removal of native vegetation would be confined to the minimal area necessary to facilitate construction activities.
- The avoidance and minimization measures for migratory birds would be applied to minimize the potential to impact nesting Swainson's hawk (tree removal during non-nesting season).
- Monitoring for Swainson's hawk will take place during construction from March to September.

#### ***Mitigation***

Caltrans would purchase in-lieu credits from the Habitat JPA for the loss of Swainson's hawk foraging habitat based on the ratios provided in the *Report Regarding Mitigation for Impacts to Swainson's Hawks in the Central Valley of California* (CDFG 1994):

- Project impacts within one mile of an active nest tree shall provide one acre of habitat management land for each acre of development authorized (1:1 ratio).
- Project impacts within five miles of an active nest tree but greater than one mile from the nest tree shall provide 0.75 acres of habitat management land for each acre of development authorized (0.75:1 ratio).
- Project impacts within ten miles of an active nest tree but greater than five miles from an active nest tree shall provide 0.5 acre of habitat management land for each acre of development authorized (0.5:1 ratio).

Based on the above mitigation ratios, the proposed project would require 27.16 acres of habitat management lands to mitigate for permanent loss of 38.05 acres suitable foraging habitat.

### **Invasive Species**

#### ***Avoidance and Minimization Measures***

In compliance with the Executive Order on Invasive Species, E.O. 13112, and subsequent guidance from the Federal Highway Administration, the landscaping and erosion control included in the project would not use species listed as noxious weeds. In areas of particular sensitivity, extra precautions will be taken if invasive species are found in or adjacent to the construction areas. These include the inspection and cleaning of construction equipment and eradication strategies to be implemented should an invasion occur.

- All construction equipment would be clean of potential noxious weed sources (mud, vegetation) before entering the project area, to help ensure noxious weeds from outside of the project area are not introduced into the project area;
- Equipment would be considered free of soil, seeds, and other such debris when a visual inspection does not disclose such material; and
- Only native plant species appropriate for the project area would be used in any erosion control or revegetation seed mix or stock. Straw used for erosion control would be obtained from a certified weed-free provider. In addition, any hydro-seed mulch used for revegetation activities must also be obtained from a certified weed-free provider.
- Non-native plant control would consist of mechanical or spot chemical treatments of the selected most invasive plant species listed by the U.S. Department of Agriculture (USDA), California Exotic Pest Plant Council (CEPPC), and California Invasive Plant Council (CALIPC) that if left untreated, would dominate the onsite mitigation area.