



Lower Trinity River Vegetation Treatment Program Humboldt and Trinity Counties, California CalVTP Project-Specific Analysis and Addendum

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Lower Trinity River Vegetation Treatment Program, Humboldt and Trinity Counties, California

CalVTP Project-Specific Analysis and Addendum

Prepared for: State Coastal Conservancy
On Behalf of: Humboldt County Resource Conservation District
Prepared by: Onterris USA, Inc.
September 2026

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Table of Contents

1	Introduction	1-1
1.1	Overview of the Project.....	1-1
1.2	California Environmental Quality Act	1-5
1.3	Purpose of this Project-Specific Analysis and Addendum	1-5
1.4	Project Need and Objectives	1-6
2	Project Description	2-1
2.1	Treatment Area.....	2-1
2.2	Treatment Types.....	2-2
2.2.1	Ecological Restoration	2-2
2.2.2	WUI Fuel Reduction	2-6
2.2.3	Fuel Breaks	2-6
2.3	Treatment Activities	2-9
2.3.1	Prescribed Burning (Broadcast).....	2-9
2.3.2	Mechanical Treatment	2-12
2.3.3	Manual Treatment	2-12
2.3.4	Herbicide Application	2-15
2.3.5	Prescribed Herbivory.....	2-15
2.3.6	Biomass Processing	2-17
2.4	Treatment Prescriptions by Fuel Type	2-18
2.4.1	Grassland Fuel Type Prescription	2-19
2.4.2	Shrub Fuel Type Prescription	2-19
2.4.3	Tree Fuel Type Prescription	2-20
2.5	General Treatment Implementation Guidelines	2-21
2.5.1	Timing of Initial Treatment and Duration	2-21
2.5.2	Workers.....	2-21
2.5.3	Site Access and Conditions.....	2-21
2.5.4	Daily Treatment Schedule and Noise.....	2-21
2.5.5	Pests, Diseases, and Invasive Species	2-21
2.6	Proposed Revisions to CalVTP SPRs and Mitigation Measures	2-22
2.6.1	SPR AQ-3 Create Burn Plan	2-22
2.6.2	SPR AQ-4 Minimize Dust	2-23
2.6.3	SPR AQ-6 Prescribed Burn Safety Procedures.....	2-23
2.6.4	SPR GEO-1 Suspend Disturbance During Heavy Precipitation.....	2-24
2.6.5	SPR HAZ-3 Require Fire Extinguishers	2-25
2.6.6	SPR AD-4 Public Notifications for Prescribed Burning.....	2-25
2.7	Treatment Maintenance.....	2-26
3	Environmental Checklist.....	3-1

3.1	Aesthetics and Visual Resources	3-1
	Discussion	3-2
3.2	Agriculture and Forestry Resources	3-6
	Discussion	3-6
3.3	Air Quality	3-8
	Discussion	3-9
3.4	Archaeological, Historical, and Tribal Cultural Resources.....	3-15
	Discussion	3-15
3.5	Biological Resources	3-21
	Discussion	3-23
3.6	Energy Resources.....	3-60
	Discussion	3-60
3.7	Geology, Soils, Paleontology, and Mineral Resources	3-62
	Discussion	3-62
3.8	Greenhouse Gas Emissions.....	3-66
	Discussion	3-66
3.9	Hazardous Materials, Public Health and Safety.....	3-70
	Discussion	3-70
3.10	Hydrology and Water Quality.....	3-74
	Discussion	3-75
3.11	Land Use and Planning, Population and Housing	3-81
	Discussion	3-81
3.12	Noise	3-84
	Discussion	3-84
3.13	Recreation	3-88
	Discussion	3-88
3.14	Transportation	3-91
	Discussion	3-91
3.15	Public Services, Utilities and Service Systems	3-95
	Discussion	3-96
3.16	Wildfire	3-99
	Discussion	3-99
4	List of Abbreviations	4-1
5	List of Preparers.....	5-1
6	References.....	6-1

Attachments

Attachment A – Standard Project Requirements and Mitigation Measures Checklist	A-2
Attachment B – Biological Resources Report	B-1

List of Figures

Figure 1	Project Location	1-3
Figure 2	Willow Creek Area Treatable Landscape	1-4
Figure 3	Ecological Restoration and Wildland Urban Interface.....	2-5
Figure 4	Fuel Break Treatments	2-8
Figure 5	Prescribed Burn Treatment.....	2-11
Figure 6	Manual and Mechanical Treatments	2-14
Figure 7	Herbicide and Herbivory Treatments.....	2-16

List of Tables

Table 1	Past Fires in Humboldt and Trinity Counties.....	1-7
Table 2.	Special-Status Plant and Wildlife Species with Potential to Occur within the Project Area	3-25
Table 3.	Sensitive Natural Communities Documented, or with Potential to Occur in the Project Area.....	3-53
Table 4.	Riparian Hardwood Tree Species and Mature DBH Ranges	3-56

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1 Introduction

1.1 Overview of the Project

The Humboldt County Resource Conservation District (HCRCD) is proposing the Lower Trinity River Vegetation Treatment Program (Project) on 37,739.26 acres of private and State Responsibility Area (SRA)¹ lands in eastern Humboldt and western Trinity Counties (project area) (**Figures 1 and 2**). The Project aligns with the priorities set forth in the 2019 Humboldt County Community Wildfire Protection Plan (CWPP) (Willow Creek Planning Unit) and the 2020 Trinity County CWPP (relevant to Salyer and Hawkins Bar).

The Project consists of ecological restoration, fuel breaks, and wildland-urban interface (WUI) fuel reduction treatments. The proposed treatment activities are prescribed burning, mechanical treatments, herbicide, prescribed herbivory, and manual treatments. Initial treatments would be implemented in phases (i.e., as funding and resources allow) as landowner approval and funding sources are available over a 10–15-year period.

The Project would design and implement measures to create protective buffers around communities, shielding them from catastrophic wildfires that may start in timberlands, while also protecting timber resources and ecological values from fires that could originate in nearby developed areas or along roads. As demonstrated in recent fires, including the CZU Lightning Complex Fire in Santa Cruz County, California, fuel breaks can be critical in providing access for firefighters into less developed areas and have been vital in creating firelines² for low-intensity fires to help slow wildfire spread. Project implementation may not stop fire spread during periods of strong, warm, downslope winds with low relative humidity (i.e., Foehn winds) when pieces of burning material can be blown across fuel breaks. However, the Project would provide points from which firefighting resources can “anchor” to conduct suppression activities, and it would increase the construction rate of firelines while simultaneously reducing the amount of air-delivered fire retardant required to coat vegetation effectively and increase firefighter safety. Slowing the spread of wildfire can provide additional time for an effective community evacuation, lessen the impact on suppression resources and have the potential to create lower intensity fire effects.

Uncontrolled wildfire is associated with environmental degradation such as increased greenhouse gas emissions, habitat loss and over a century of fire suppression. The Project would reduce hazardous fuels in a deliberate manner designed to minimize environmental impacts while

¹ State Responsibility Areas (SRA) are designated by the Board of Forestry and Fire Protection (BOF) as lands where the California Department of Forestry and Fire Protection (CAL FIRE) is the primary agency responsible for fire suppression and prevention, with classification based on vegetation and natural resource value rather than fire protection capability. SRA boundaries, reviewed every five years, exclude federally owned land, city areas, and other lands not meeting the criteria outlined in Public Resources Code (PRC) 4126 (BOF 2025).

² A fireline is a break in fuel, made by cutting, scraping, or digging. It can be done by mechanized equipment such as bulldozers, but in most parks, it is done using hand tools (National Park Service [NPS] 2017).

increasing the safety of communities. Strategic fuel removal would focus on areas of high fuel concentrations and would disrupt the horizontal and vertical continuity of fuel loads. Fuel treatments would aim to increase the wildfire resiliency of the ecosystems within the Project. Biological diversity in the area would be strengthened by promoting conditions that favor native plant and animal species. Forest health would be improved through enhancing native, fire-resilient plant communities primarily through ladder fuel and weed removal, opening space for native plants to return. Healthy, mature trees dominating the canopy would be retained while the surrounding vegetation is thinned out and retained, reducing new brush and understory growth while preserving the carbon sequestration function. Biomass would be strategically diminished across the project area.

The Project would be implemented on private lands in the vicinity of Willow Creek in Humboldt County and Salyer and Hawkins Bar in Trinity County, collectively known as the Greater Willow Creek area and often considered a distinct region for fire prevention. The communities of Willow Creek, Salyer, and Hawkins Bar are rural and unincorporated communities with an approximate combined population of 2,500. The Greater Willow Creek area sits within the Six Rivers National Forest and is situated along the Trinity River. Communities lie in “High” or “Very High” Fire Hazard Severity Zones within SRA according to CAL FIRE Data from 2026.

The project treatments proposed in this Project Specific Analysis (PSA) would reduce hazardous wildfire fuels in a deliberate manner designed to minimize environmental impacts to wildlife and protected plants consistent with the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR; Ascent Environmental 2019). For the entire state, the CalVTP PEIR identified 20.3 million acres within the 31-million-acre SRA that may be appropriate for vegetation treatments as part of the CalVTP. The PEIR calls this the “treatable landscape” or “treatable areas.” CalVTP recognizes that the treatable landscape represents areas suitable for CalVTP vegetation treatments, but projects will not necessarily occur in every location within the treatable landscape. The location and geographic extent of projects will be determined based on several factors, including environmental constraints and treatment objectives, which are analyzed for the project proposed within this PSA.

Of the 37,739.26-acre project footprint, about 86.3 percent (32,568.73 acres) is located within the CalVTP treatable landscape (Figure 2). Because approximately 13.7 percent (5,170.53 acres) of the project footprint occurs outside of the treatable landscape, this document serves as both a PSA and an Addendum to the CalVTP PEIR to provide compliance with the California Environmental Quality Act (CEQA) for the proposed vegetation treatments within and outside of the treatable landscape.

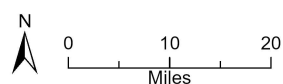
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Figure 1
Project Location
Lower Trinity River Vegetation
Treatment Program

 Project Boundary

Sources: Sources: Esri, TomTom, Garmin, FAC, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for Environmental Information. Data refreshed October 27, 2025-v2.1



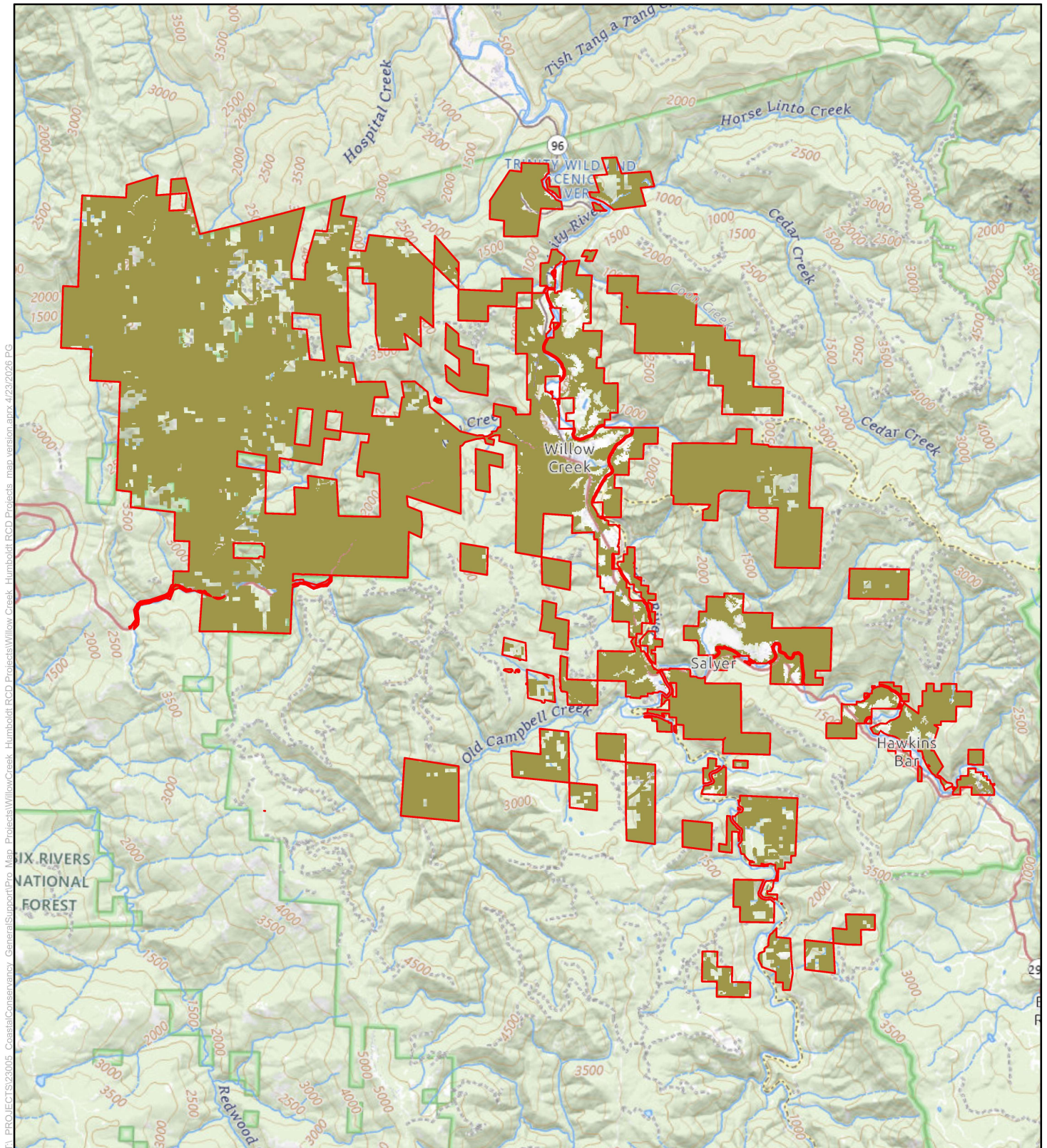
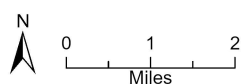


Figure 2
 Willow Creek Area
 Treatable Landscape
 Lower Trinity River Vegetation
 Treatment Program

 Project Boundary
 Treatable Landscape



Sources: CALFIRE; Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HII; NOAA National Centers for Environmental Information. Data refreshed October 27, 2025-v2.1, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

1.2 California Environmental Quality Act

The CalVTP PEIR evaluated the potential environmental effects of implementing vegetation treatments to reduce the risk of wildfire within CAL FIRE's SRA. Serving as the lead agency under CEQA, the HCRCD is proposing vegetation treatments across 37,739.26 acres of land within Humboldt and Trinity Counties. The proposed treatment types include ecological restoration, fuel breaks and fuel reduction at the WUI. The treatment activities and methods include prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory.

The HCRCD has evaluated the proposed treatments for CEQA compliance as later activities covered by the CalVTP PEIR using the PSA checklist presented below. These treatment types and treatment activities are consistent with those covered in the CalVTP PEIR. Ongoing maintenance of the proposed vegetation treatment areas would involve the same activities as the original treatments (i.e., prescribed burning, mechanical treatment, manual treatment, herbicide application, and prescribed herbivory).

This document is being prepared for the HCRCD and serves to provide CEQA compliance for the implementation of vegetation treatments that require a discretionary action by a state or local agency. HCRCD is the CEQA lead agency for the Project because it has discretionary authority to approve the Project. HCRCD is also the project proponent. As defined in the CalVTP PEIR, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. In addition, within this Project Specific Analysis and Addendum (PSA/Addendum), the HCRCD is referred to as the "implementing entity" reflecting its role as the lead implementer of treatments. While acting as the implementing entity, the HCRCD will work together with project funders, community partners, nonprofit organizations, and governmental agencies to implement the project. Other implementing entities may be the Willow Creek Fire Safe Council (WCFSC), Watershed Research and Training Center (WRTC), and the Trinity County Resource Conservation District (TCRCD).

1.3 Purpose of this Project-Specific Analysis and Addendum

This document serves as a PSA and Addendum to evaluate whether the proposed treatments are within the scope of the CalVTP PEIR. The criteria for determining whether a proposed treatment is within the scope of the CalVTP PEIR are whether the proposed treatment types and activities are consistent with the CalVTP and whether a treatment project is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

The proposed treatment types and treatment activities under the Proposed Project are consistent with the CalVTP. Approximately 86.3 percent of the project is within the treatable landscape as

designated in the CalVTP. The Project also proposes to treat certain areas that are outside the CalVTP-designated treatable landscape.

The PSA checklist (see Chapter 3) includes the criteria to support an addendum to the CalVTP PEIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the “changed condition” of additional geographic area, would result in significant impacts that would be more severe than those covered in the CalVTP PEIR and/or would result in any new impacts that were not covered in the PEIR. The project-specific mitigation monitoring and reporting program (MMRP), which includes the CalVTP standard project requirements (SPRs) and mitigation measures (MMs) applicable to the Project, is presented in **Attachment A**. The SPRs and MMs have been tailored to the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and conditions and resources present within each treatment site. In all cases, the additional project-specific implementation instructions and clarifying edits to MMs maintain the SPRs and MMs as equivalent or more effective than those presented in the PEIR. Where applicable, the SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation of the Project.

This document also serves as an addendum to the CalVTP PEIR for the inclusion of the additional 5,170.53 acres outside of the CalVTP treatable landscape. An addendum to an EIR is appropriate when, after a previously prepared EIR has been certified, changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts. In this case, there are no changed circumstances.

1.4 Project Need and Objectives

Forested landscapes across Humboldt and Trinity Counties including those in the project area, have experienced over one hundred years of fire suppression and a climate that is becoming warmer and drier. These factors have contributed to substantial change in regional ecosystems and a decline in overall forest health. Compounding these effects are a suite of related ecological feedbacks, including conifer species displacing hardwoods and other fire resilient native plant species, reducing biodiversity and affecting the suitability of these habitats for rare and special-status wildlife and plants. In addition, altered fire regimes and increased fuel loads are driving larger and more high-intensity wildfires which have been suffered by the local communities this project looks to help with preventative treatments. As a result of the lack of consistent, regular management activities, these systems have undergone unsustainable structural and compositional changes at the ecosystem level that require environmentally sensitive landscape-level treatments to provide resistance and resilience to the effects of changing climatic and ecological conditions. In December 2021, winter storms struck the Lower Trinity River area, leaving an expansive amount of downed trees and vegetation in its wake. This storm severely magnified the already high hazardous fuel loads in the region.

The Lower Trinity River area is situated within the Klamath Mountains of eastern Humboldt and western Trinity counties in northern California. Six Rivers National Forest constitutes the majority of this area’s landmass. Ethnographically, the region surrounding the Lower Trinity River falls within the traditional homelands of several closely related Athabascan-speaking Indigenous groups, including the Hupa, Chilula, Whilkut, and Tsnungwe (tsnʉŋ.wei or TS-NUUNG-way) peoples; although Tribal boundaries are often generalized and represent overlapping, watershed-based territories with uncertain boundaries. The region is characterized by mountainous terrain and steep river canyons forged by the Trinity River, a major tributary to the Klamath River, and its network of tributaries. From sustaining Tribes for generations with its abundant fisheries to enticing pioneers with the prospect of gold, the Trinity River has long been the lifeblood of this area, and it continues to support a broad array of cultural, recreational, and resource values, all of which are increasingly vulnerable to wildfire. In particular, there are notable concentrations of designated culturally sensitive areas along the Lower Trinity River, with more sensitive locations confidentially held by Tribal organizations.

Shifts away from Tribal stewardship methods and towards widespread forest fire suppression in recent centuries have caused this landscape to diverge dramatically from historic conditions. As a result of this management, the vast majority of forests across the region are now overly dense with severely degraded forest health, contributing to a high degree of wildfire risk. Long, hot summers with low moisture levels exacerbate hazardous fuels, and – as climate change intensifies – these conditions threaten to further amplify the rate at which wildfires spread and the intensity with which they burn. Restoring “good fire” to this landscape will be integral to supporting a shift back to Tribal stewardship methods, improving forest health, and mitigating wildfire risk across the region.

Table 1 describes the most notable fires that occurred within Humboldt and Trinity Counties over the past 10 years.

Table 1 Past Fires in Humboldt and Trinity Counties

Fire Name	County(ies)	Acres Burned	Year
Six Rivers Lightning Complex	Humboldt	50,198	2023
Six Rivers Lightning Complex	Humboldt and Trinity	41,596	2022
McFarland Fire	Trinity	122,653	2021
River Complex	Trinity, Siskiyou	199,359	2021
Knob Fire	Humboldt	2,421	2021
Monument Fire	Trinity	223,124	2021
August Complex Fire	Humboldt and Trinity	1,032,648	2020
Red Salmon Complex Fire	Humboldt and Trinity	144,698	2020
Carr Fire	Trinity	229,651	2018

Sources: Western Fire Chiefs Association 2022, Frontline Wildfire Defense 2026, Humboldt County 2019

Within the project area, treatments are designed by the HCRCD to meet the following objectives:

- Establish healthy, resilient, fire-adapted ecosystems to protect and conserve natural resources;
- Protect the wildland urban interfaces while preserving the ecological integrity of the region;

- Promote the long-term storage of carbon and reduce the severity of catastrophic wildfire, thereby increasing community and forest ecosystem protection; and
- Restore ecosystems after wildfire events.

2 Project Description

The HCRCD has proposed the Project to reduce and maintain hazardous fuels on up to 37,739.26 acres located within a CAL FIRE SRA. The project footprint and surrounding area have a wildfire hazard risk that is considered “high” or “very high” by CAL FIRE (CAL FIRE 2026). Multiple factors contribute to wildfire hazard risk, including widespread invasive, noxious, fire-hazardous vegetation; decades of accumulating dead vegetation; over a century of fire suppression; and the increased risk of anthropogenic ignition associated with dense urban development (CAL FIRE 2022). The Project would reduce fuel loads to more natural levels and maintain them at those reduced levels.

Treatment types and activities would be contingent upon existing site conditions, accessibility, and fuels management needs to achieve the goals of the Project. The Project proposes treatment types consistent with the CalVTP, and proposed activities would be consistent with CalVTP-described treatment activities: manual treatment (including riparian thinning), mechanical treatment, prescribed burning (broadcast and pile), prescribed herbivory, and prescribed herbicide. While 86.3 percent of the project footprint includes land mapped as treatable landscape by the CalVTP, 13.7 percent is not considered to be within the CalVTP treatable landscape. Treatment types and treatment activities explained in this project description would be consistent throughout the project footprint regardless of whether it has been mapped as treatable landscape.

2.1 Treatment Area

Among the criteria for determining if a treatment project is within the scope of the CalVTP PEIR is whether it is located in the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). Portions of the project area extend outside of the treatable landscape described in the CalVTP PEIR. In total, these areas outside the treatable landscape encompass approximately 5,170.53 acres of the 37,739.26-acre project area; they are dispersed in small sections around the project area. The scattered array of acres outside of the CalVTP treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., SRA and Local Responsibility Area [LRA]), the method resulted in some treatable landscape areas that are shown on maps to be disjointed and scattered and some that are in held LRA areas surrounded by SRA. If the areas of the Project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable.

Project implementation would take place over a period of several years. Specific implementation phases would depend on the availability of funding, prioritization of work, capacity of project staff, ability to maintain treatment areas, and possibly environmental conditions such as weather and ecological concerns. The initial treatment priorities would be within the WUI and in shaded and non-shaded fuel breaks. No more than 1,500 acres would be treated on an annual basis.

2.2 Treatment Types

The proposed treatment types are ecological restoration, WUI fuel reduction, and fuel breaks. These treatment types are described in more detail below and are consistent with the treatment types described in the CalVTP.

2.2.1 Ecological Restoration

Ecological restoration treatments would be designed to reduce wildfire risk, enhance natural ecological processes, improve forest health and help severely impacted lands recover from catastrophic wildfire (**Figure 3**). Ecological restoration treatments would occur in several vegetation types, such as conifer forest (e.g., Douglas fir, mixed conifer), montane hardwood-conifer, montane chaparral, grassland, and riparian habitat. Species preference (i.e., tree species that would be retained) would vary, but in general would include black oak (*Quercus kelloggii*), white oak (*Q. garryana*), sugar pine (*Pinus lambertiana*), incense cedar (*Calocedrus decurrens*), Port Orford cedar (*Chamaecyparis lawsoniana*), ponderosa pine (*P. ponderosa*), Jeffrey pine (*P. jeffreyi*), Pacific madrone (*Arbutus menziesii*), tanoak (*Lithocarpus densiflora*), and Pacific yew (*Taxus brevifolia*). Late seral Douglas fir (*Pseudotsuga menziesii*) would also typically be retained across all treatment types. Heterogeneity in treated areas would be restored by selectively thinning using mechanical treatments and manual treatments and by thinning with prescribed burning. The project areas would be maintained with a combination of prescribed burning, herbicide, herbivory, and mechanical and manual treatments to restore historic fire regimes and ecosystem functions. These activities would aim to recreate pre-fire suppression vegetation distribution, which relied on the combination of wildfire ignited by lightning, and application of anthropogenic fire to establish functioning, resilient, heterogeneous habitats at multiple scales. These treatments could benefit native flora, wildlife habitat, and increase successional complexity.

Prescribed burning is a management action capable of improving the adaptive capacity of ecosystems in California that have experienced degradation (California Natural Resources Agency et al. 2021). Prescribed burning of appropriate intensity and frequency has multiple benefits in ecosystems. Prescribed burning can be used to restore the ecological function in areas that have departed from their natural fire regime. Prescribed fire improves wildlife habitat, especially when patches of unburned areas are left for nesting and cover. In fire-adapted forests, it reduces competition from species that cannot tolerate fire. It encourages the new growth of native vegetation, increases the biodiversity of plant species, minimizes the spread of pest insects and disease, and recycles nutrients back into the soil (North Carolina State University 2021).

Ecological restoration treatments would result in the following actions.

- Thin ladder fuels (i.e., hardwoods and conifers) and suppressed and intermediate trees less than 18 inches diameter at breast height (DBH). In some cases, hazardous trees larger than 18 inches DBH may be removed where they will minimally damage trees to be retained and after consulting with a qualified Registered Professional Forester (RPF), qualified biologist, or designee.

- Remove small diameter (i.e., less than 12 inches DBH) trees where larger (i.e., greater than 12 inches DBH) conifers and oaks exist (e.g., where smaller trees are creating ladder fuels). Treatments may include girdling Douglas fir trees up to 24 inches DBH that are adjacent to characteristic legacy (i.e., old trees that have been spared during harvest or have survived stand-replacing natural disturbances) hardwood tree species. Girdling would occur primarily in stands that were historically more open and have been invaded by conifers during the fire exclusion era. In many cases, Douglas fir trees penetrating the canopy of legacy hardwoods are large enough that felling would cause unwanted harm to the legacy hardwood tree. Girdling allows the conifer to both be utilized as a wildlife tree, and to lose water weight such that when it does fall, residual damage to the adjacent legacy hardwood is minimized. In plantations, a sufficient number of small-diameter trees would be retained such that age class diversity would be maintained and to facilitate regeneration as determined by an RPF or qualified biologist. Removal of dead and dying trees as a result of high severity wildfires will occur as well. These trees may be standing or fallen over as a result of climatic events or loss of structural integrity. Retention of 1-10 snags per acre in these areas of severe mortality will occur for wildlife purposes and as determined by an RPF or qualified biologist.
- Remove trees 12–24 inches DBH with the potential purpose of using these whole trees for future instream fish habitat restoration projects or for standing snags as described above that would function as standing wildlife habitat. Trees would be selected by an RPF, qualified biologist, or designee.
- Conifer trees removed for the purpose of fish habitat restoration projects will be removed using an excavator or digging type of equipment to carefully dig up the root wad and tip trees over slowly to minimize damage to adjacent vegetation and soils. If the area has the potential to be an archeologically sensitive area, an archaeologist or cultural monitor approved by the local tribe(s) would be on site during excavation. Stump holes would be immediately filled by the excavator, and erosion control measures would be implemented if needed (e.g., weed free straw spread across disturbed areas). Tree tops would be bucked and either machine or hand piled for pile burning, chipped or lopped and scattered. If pile burned, it would occur in a suitable burn window with all appropriate permits and plans in place. The root wad and up to 50 feet of the bole would be retained, as well as any additional usable logs, and loaded with the excavator onto a dump truck or log truck for transport to staging areas near stream restoration projects. HCRCD will obtain any necessary permits required for in-stream restoration activities. Only existing roads would be used to transport these materials.
- Prune lower branches of trees up to 15 feet above ground, not exceeding 1/3 live crown ratio.
- Trees would be spaced approximately 10-40 feet apart depending on stand age, and shrubs would typically be separated by 10-20 feet, depending on the size class of vegetation; where conditions vary.
- Thin or remove encroaching conifers, hardwoods, and shrubs less than 18 inches DBH from existing and historic woodlands.
- Remove nonnative/ invasive shrubs and vegetation.

- Apply herbicides to vegetation where sprouting species (e.g., tanoak) or invasive species are present.
- Remove dead, hazardous fuels from wildfire footprints.

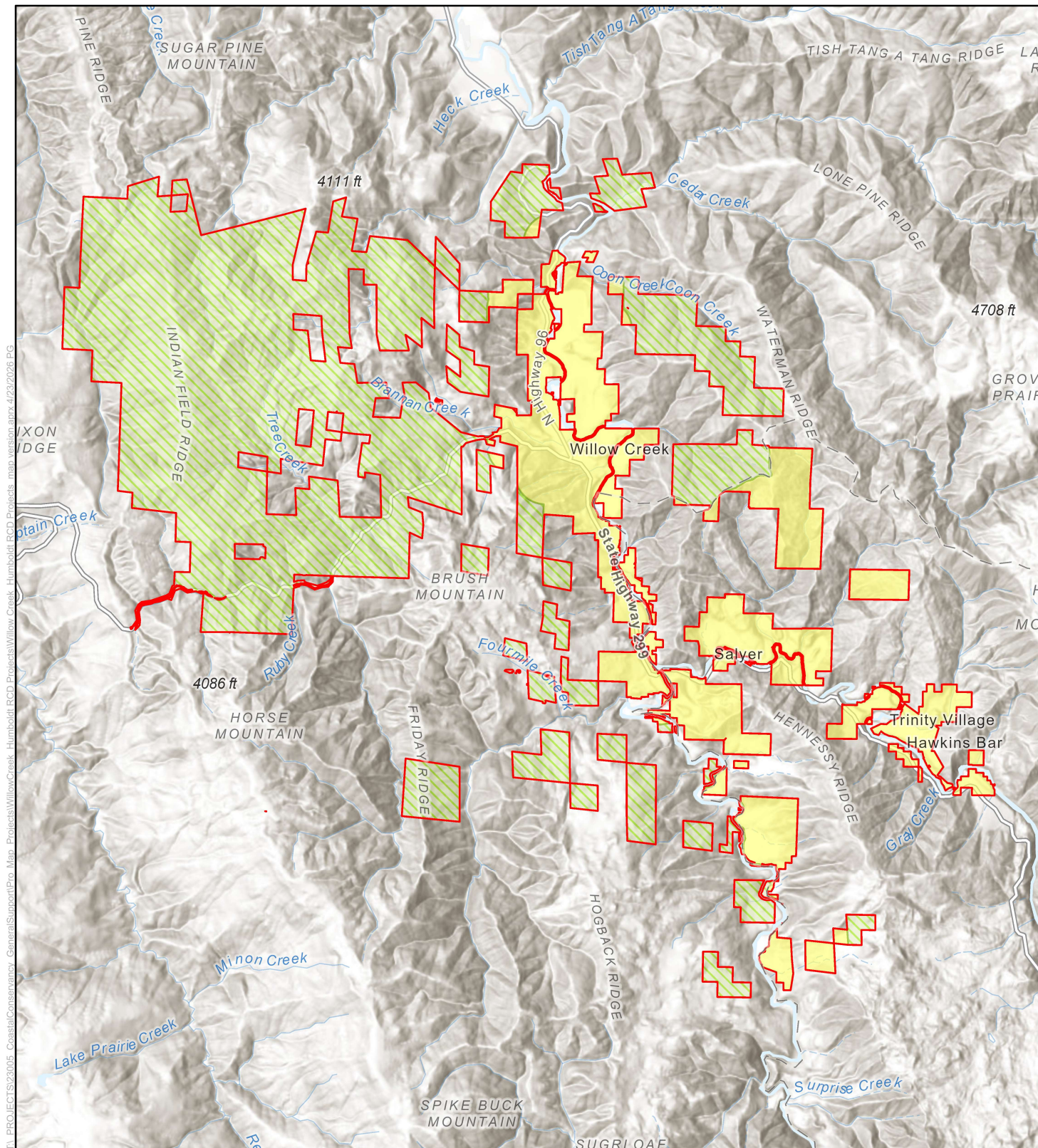
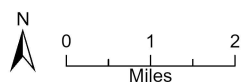


Figure 3
Ecological Restoration and
Wildland Urban Interface
 Lower Trinity River Vegetation
 Treatment Program

- Project Boundary
- Ecological Restoration (26,595.21 ac)
- Wildland Urban Interface (WUI) (11,144.04 ac)

Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS



2.2.2 WUI Fuel Reduction

WUI fuel reduction treatments would be designed to reduce wildfire risk, develop fire-adapted communities, improve forest health and encourage sustainable vegetation diversity (Figure 3). Treatments would vary slightly depending on the vegetation type being treated. WUI fuel reduction treatments would result in the following actions.

- Thin ladder fuels (i.e., hardwoods and conifers) less than 18 inches DBH. In some cases, hazardous trees larger than 18 inches DBH may be removed where they will minimally damage trees to be retained and after consulting with a qualified Registered Professional Forester (RPF) or qualified biologist, or designee.
- Trees would be spaced approximately 10-40 feet apart depending on stand age, and shrubs would typically be separated by 10-20 feet, depending on the size class of vegetation; where conditions vary. Preferentially remove trees with mistletoe infections, sooty mold, conks or other signs of rot, broken tops, or other damage.
- Prune lower branches of trees to up to 15 feet above ground, do not exceed 1/3 live crown ratio.
- Apply herbicides to vegetation where sprouting species (e.g., tanoak) or invasive species are present.
- Remove nonnative/ invasive shrubs and vegetation.

2.2.3 Fuel Breaks

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They may also provide safe emergency egress during wildfires.

The Project would use treatment types in combination to create linear breaks along ridgelines for firefighting resources to contain or stop a fire. Strategic placement of WUI fuel breaks would be based upon the prevailing vegetation types, topographic characteristics, environmental considerations, and surrounding land uses. Fuel breaks give firefighters access to control wildfires and are useful in slowing fires before they grow beyond initial attack capabilities. Fuel breaks permit responders to reach the leading edges of a fire and protect isolated communities. Fuel breaks can also stop or reduce the lateral spread of fires. In heavily wooded areas, a shaded fuel break would be implemented; the retained canopy shade would slow future growth of many grass and brush species and assist in future maintenance efforts. Development and maintenance of a fuel reduction zone within a 300-foot-wide fuel break would extend around community structures located adjacent to undeveloped open spaces. Portions of the fuel break would extend up to a width of 300 feet based on topography, site conditions, and land management constraints. Work would be completed with minimal disturbance to the ground and remaining vegetation.

Fuel breaks would mostly be shaded; however, unshaded fuel breaks may be implemented in areas that contain only shrubs (i.e., no tree canopy). Fuel breaks would be established along strategic topographic locations (e.g., on ridge tops) and; adjacent to roads, as shown in **Figure 4**. Fuel breaks would:

- Thin ladder fuels (i.e., hardwoods and conifers) less than 18 inches DBH. In some cases, hazardous trees larger than 18 inches DBH may be removed where they will minimally damage trees to be retained and after consulting with a qualified Registered Professional Forester (RPF) or qualified biologist, or designee.
- Trees would be spaced approximately 10-40 feet apart depending on stand age, and shrubs would typically be separated by 10-20 feet, depending on the size class of vegetation; where conditions vary.
- Preferentially remove trees with mistletoe infections, sooty mold, conks or other signs of rot, broken tops, or other damage.
- Prune lower branches of trees to up to 15 feet above ground, do not exceed 1/3 live crown ratio.
- Apply herbicides to vegetation where sprouting species (e.g., tanoak) or invasive species are present.

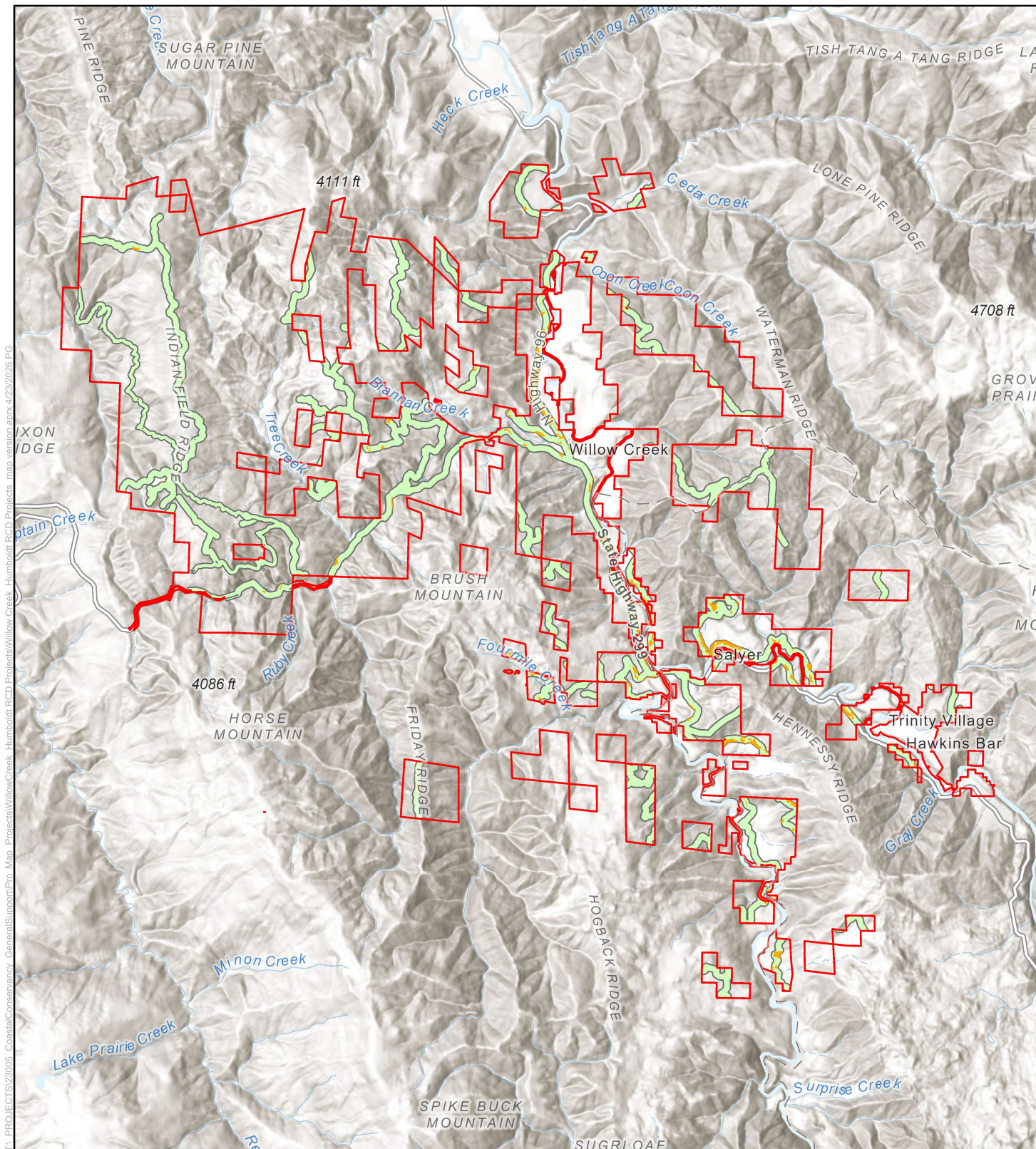
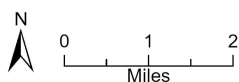


Figure 4
Fuel Break Treatments
 Lower Trinity River Vegetation
 Treatment Program

- Project Area
- Unshaded Fuelbreak Treatment (293.82 acres)
- Shaded Fuelbreak Treatment (6,568.65 acres)

Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS



2.3 Treatment Activities

The proposed vegetation treatment activities that would be used in various combinations to implement the treatment types described above are prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, and herbicide application. Biomass would be processed using mastication, chipping, piling and burning, prescribed fire, and lop and scatter. Each of these activities is included in the CalVTP PEIR and is described in more detail below.

2.3.1 Prescribed Burning (Broadcast)

Prescribed burning would occur across up to 37,739.26 acres proposed for treatment over the 10- to 15-year initial-treatment implementation period and consists of two general types, broadcast burning (understory burning) and pile burning. Prescribed burning would also be used for maintenance of previously treated areas (**Figure 5**).

Broadcast Burning

Prescribed fires would mimic the low-intensity fire regimes historically prevalent in the region, including intentional cultural burning practices, and would create similar structural and habitat conditions that benefit many plant and wildlife species. Gradual reintroduction of fire presents an opportunity to improve forest health, reduce critical fuel loading, improve emergency access, and regenerate a healthy ecosystem. Prescribed or cultural fires (broadcast burning) would be used to control vegetation and manage fuel loads. Burns could occur year-round when conditions would be conducive to burning targeted fuels. When possible, burning would be timed to control invasive non-native grasses where present. Prescribed burning would remain within a predetermined area and would occur only with specific fuels and weather conditions.

Perimeter fire lines would include existing roads and natural features where possible to maintain aesthetic values. Additional holding lines will be used as needed based on site specific conditions and the requirements of the burn boss, CAL FIRE, or other qualified person. Prescribed burns would occur after adequate burn prep has been done to ensure that the objectives of the burn can be met while keeping negative impacts to forest health to a minimum. Burn prep includes forest thinning, removal of forest fuel around the base of high value trees, and other activities needed to ensure a safe and effective burn can be done. Prescribed burns will be used for maintenance of the Fuel Break treatment and will also be done multiple times over the next 10-15 years as needed to meet the objectives of lower fire risk and improved forest health.

Active burns would follow environmental safety guidelines, including burning only under consideration of specific weather conditions (e.g., appropriate humidity, wind direction) and coordinating with resource agencies such as the California Air Resources Board (CARB) and the North Coast Unified Air Quality Management District (NCUAQMD). Specifically, active burns would include the preparation and implementation of a burn plan and a Smoke Management Plan (SMP). The HCRCD would report site conditions and request approval to burn through the Prescribed Fire Information Reporting System (PFIRS), which serves as an interface between air quality managers, land management agencies, and individuals that conduct prescribed burning in California. A

prescribed burn SMP must be submitted to the NCUAQMD at least 30 days prior to burning and must be approved prior to burning.

Prescribed burns would typically be ignited using various ignition devices, including, but not limited to, drip torches, propane torches, fuzees, helitorches, traditional firing devices, and vary pistols. Prescribed burns are typically completed in a single day, but under certain circumstances could be maintained for up to 1 week. On average, up to 45 workers are present on site for a prescribed burn. Broadcast burning may use bulldozers to install control lines pre-emptively and in case of an emergency. Heavy equipment would be operated from an existing road or stable operating surfaces with less than 50 percent slope. Low intensity back burns would be allowed to enter watercourse and lake protection zones (WLPZs), however, no ignition would occur within these areas (see SPR HYD-4).

Pile Burning

Biomass from mechanical and manual treatments would be piled using equipment (e.g., skid steer, tractor, bulldozer, excavator) or hand crews and burned appropriately. Machine pile burning would occur in areas with little to no live overstory, and hand piles would be placed to avoid adverse effects on desired retention tree species. Mechanical piles would be no larger than 20 feet by 20 feet in area and 20 feet in height, and would be limited to not more than 15 percent of the treatment area. Over the past century plus of fire exclusion, vegetation and stem densities have increased across all habitat types. While all efforts will be made to reduce soil impacts from piles burned in these dry meadows, some burning will need to occur to protect these meadows from further encroachment. Hand piles would be up to approximately 10 feet by 10 feet in area and 10 feet in height and would be placed away from the dripline of trees and outside of special-status plant buffers. Hand piles would not exceed 15 percent of the total treatment area.

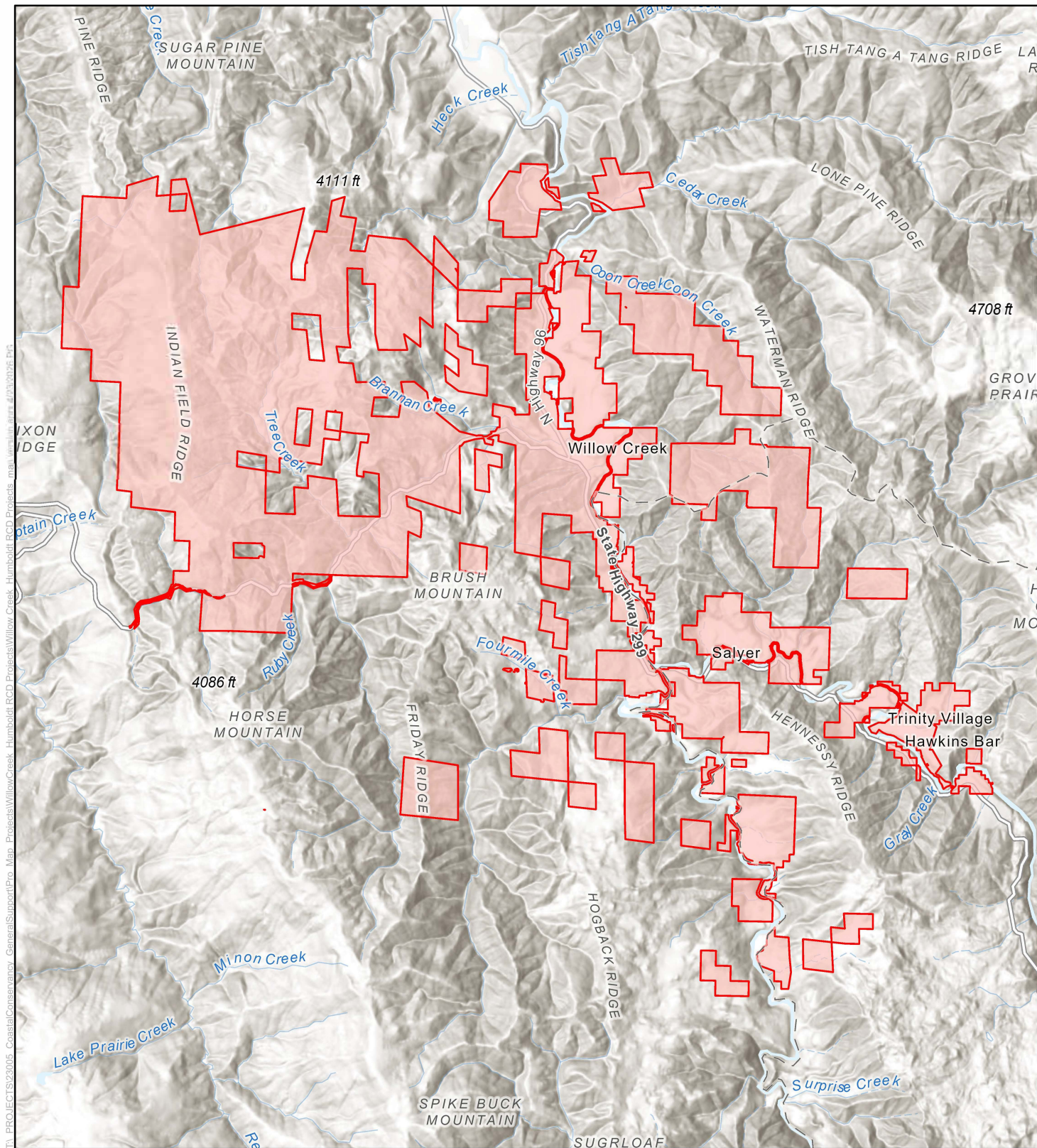
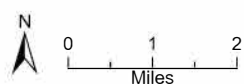


Figure 5
Prescribed Burn Treatment
 Lower Trinity River Vegetation
 Treatment Program

- Project Area
- Prescribed Burning Treatment (37,739.26 acres)

Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS



2.3.2 Mechanical Treatment

Mechanical treatments would occur on up to 28,393.47 acres of the 37,739.26 acres proposed for treatment over the 10- to 15-year implementation period and may include tree removal with a processing feller buncher, masticator head on an excavator, skidder, skid steer, or dozer; whole tree removal with an excavator for use in fish habitat restoration projects; mastication, mowing and chipping (Figure 5). No more than 800 acres would be treated using mechanical methods in any year. Mechanical treatment activities would occur on slopes less than 40 percent grade, along ridges, and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or other stable operating surfaces. No mechanical treatment would occur on slopes greater than 50 percent grade that have an erosion hazard rating of high or extreme or on mapped unstable areas. Mechanical treatments in areas greater than 50 percent grade on unstable areas and unstable soils (soil with moderate to high erosion hazard) would require evaluation by an RPF, licensed geologist, or other qualified person prior to treatment. Equipment may include but not limited to masticators, chippers (tracked and wheeled), and excavators (Table 1). Mechanical treatments would typically require between 1 and 50 crew members. Generally, mechanical treatments would result in the following actions:

- Remove ladder fuels less than 18 inches DBH;
- Remove conifer trees up to 24 inches DBH with the purpose of using these whole trees for future instream fish habitat restoration projects using excavators;
- Remove overstory trees to increase crown spacing and to benefit remaining hardwoods;
- Prune lower branches of trees to up to 15 feet above ground, do not exceed 1/3 live crown ratio; and
- Remove invasive species.

Mechanical treatments would not be conducted within WLPZs. Some vegetation may be removed by reaching an excavator arm into a meadow or WLPZ such that no ground disturbance would occur within meadows or WLPZs.

2.3.3 Manual Treatment

Manual treatments could occur on the entirety of the 37,739.26-acre project area over the 10- to 15-year implementation period and would primarily include hand thinning and pruning target vegetation to reduce ladder fuels and increase space between trees, and hand piling removed vegetation (**Figure 6**).

Ground crews may use hand tools and hand-operated power tools, including, but not limited to, chainsaws, hand saws, pole saws, McLeods, Pulaskis, weed pullers, brush cutters, and loppers. Manual treatments would cut, clear, and/or prune trees, herbaceous vegetation, and woody shrubs to increase space between trees. Manual treatments would also be used to treat dead, dying, and diseased trees. Manual treatments may occur anywhere within the project area. In some instances, manual treatments may be used in areas that have previously undergone mechanical treatments if

additional pruning is needed. As part of proposed manual treatments, riparian thinning would also be conducted using hand crews within the 50-foot exclusion zone from state or federally jurisdictional waters and riparian habitat to reduce stems per acre and shift species composition toward more deciduous tree species, reduce the risk of wildfire, improve forest health, and increase streamflow.

Manual treatments would typically require between 1 and 50 crew members; however, crews would typically include between two and 10 personnel. Multiple crews may be working simultaneously. Generally, manual treatments would:

- Remove ladder fuels less than 18 inches DBH.
Prune lower branches of trees to up to 15 feet above ground, do not exceed 1/3 live crown ratio.
- Prepare burn units for prescribed fire including but not limited to, pull back (i.e., scraping dead and downed materials from the base of trees to prevent ignition of trees during prescribed burning), control line construction, thinning, and lop and scatter.

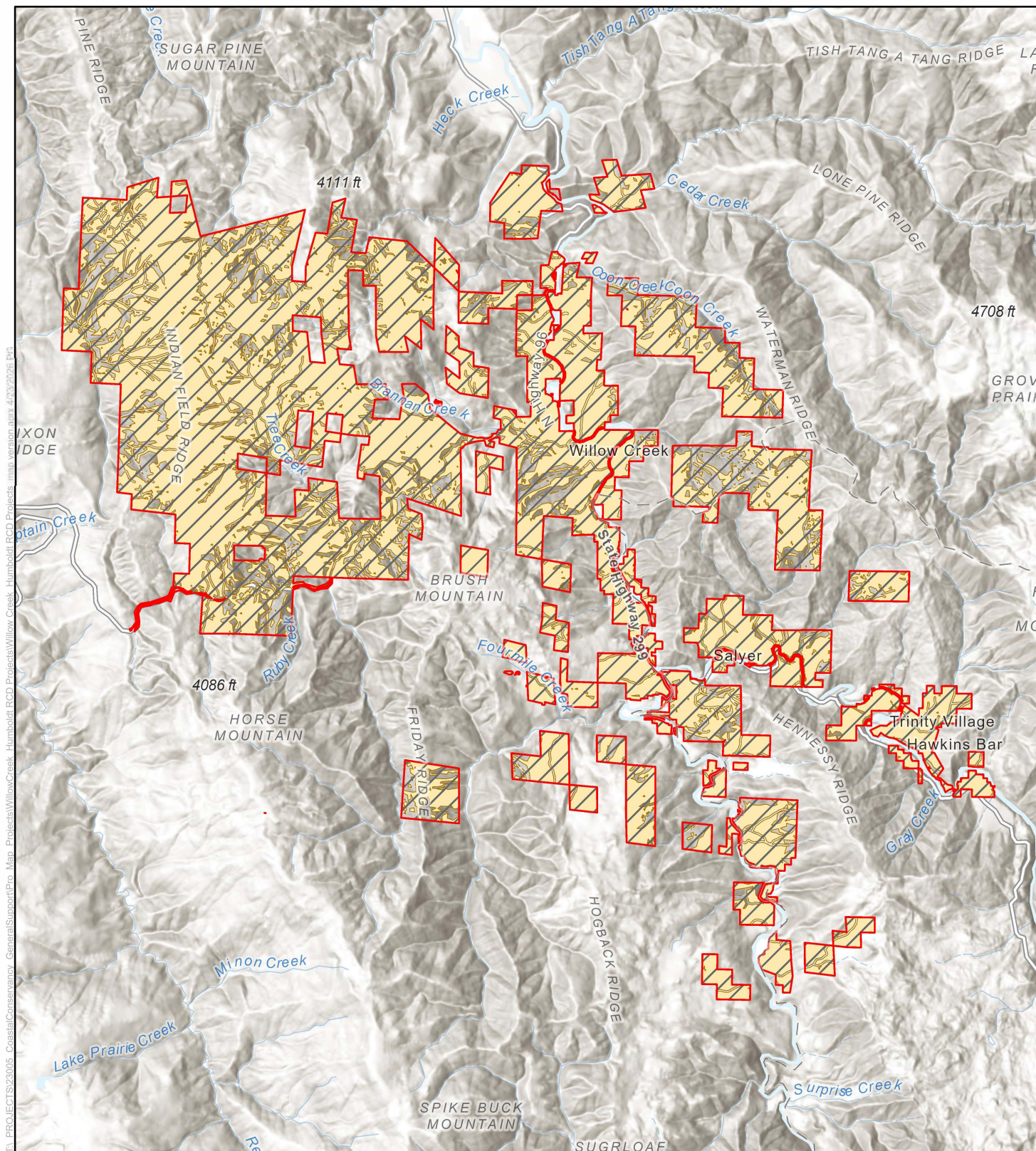
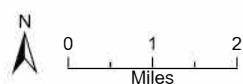


Figure 6

Manual and Mechanical Treatments
Lower Trinity River Vegetation
Treatment Program

- Project Boundary
- Manual Treatment (37,739.26 acres)
- Mechanical Treatment (slope <= 50%) (28,393.47 acres)



Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS

2.3.4 Herbicide Application

Herbicide will only occur in parts of the project area that are located within Humboldt County (Figure 6). Herbicide application would occur on up to 31,413.47 acres proposed for manual or mechanical treatment and would occur where sprouting species such as tanoak are present or invasive species to reduce the costs and need for constant maintenance. Herbicides that may be applied are listed below, which are consistent with those considered for use in the CalVTP:

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Velpar (hexazinone);
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E); and
- Esplanade (Indaziflam).

Only ground-level application would occur; no aerial spraying of herbicides would occur. Herbicide treatments would typically use crews consisting of 2 to 20 workers. Several herbicide application methods are available for use by on-the-ground personnel, including paint-on stems and/or backpack hand-applicators. Herbicide application would comply with the U.S. Environmental Protection Agency (USEPA) label directions, as well as California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation label standards. All herbicide application would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations. Only herbicides labeled for use in aquatic environments will be used when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses.

2.3.5 Prescribed Herbivory

Prescribed herbivory for hazardous fuel reduction is the intentional use of domestic livestock to remove, rearrange, or convert vegetation in wildlands to reduce the costs and losses associated with wildfires and to enhance the condition of forests, rangelands, and watersheds (**Figure 7**). Prescribed herbivory can offer a variety of benefits in comparison to other types of vegetation treatments. Herbivores are essentially a “biological masticator” that can reproduce themselves and turn unwanted biomass into a consumable product that can sustain the animal. In addition to fire

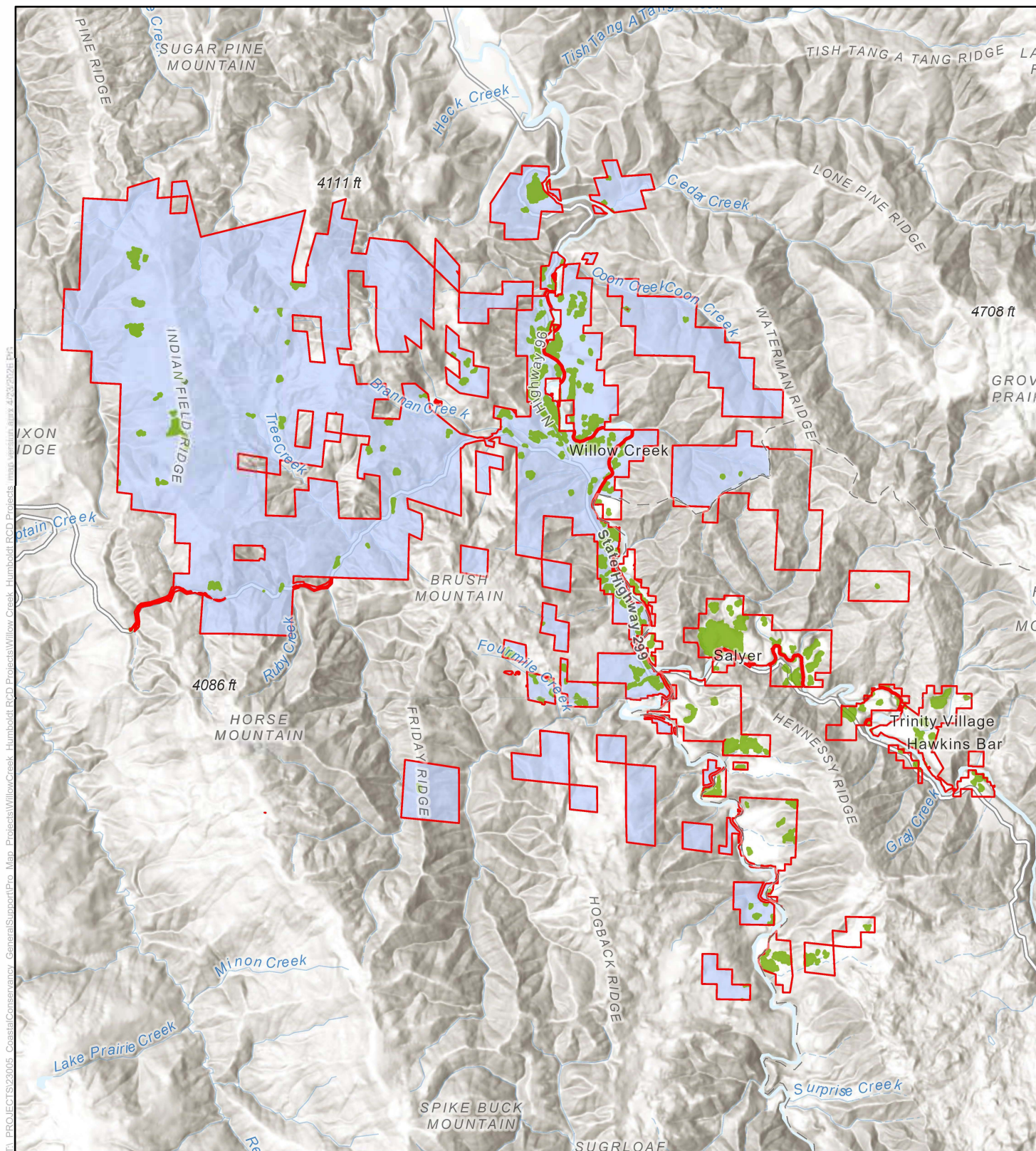
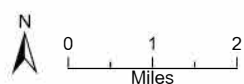


Figure 7
Herbicide and Herbivory Treatments
 Lower Trinity River Vegetation
 Treatment Program

- Project Area
- Herbivory Treatment (1,250.55 acres)
- Herbicide Treatment (31,413.47 acres)



Sources: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS

prevention benefits, carefully managed grazing can provide important environmental benefits such as increased soil organic matter, control of invasive species, and improved plant and wildlife habitat.

The HCRCD would consider the following in designing treatments that use prescribed herbivory instead of other treatment activities:

- Air quality, when compared to the use of prescribed burning.
- Noise, when compared to mechanical treatment and some manual treatments.
- Proximity to structures, when compared to risks of using prescribed burning or mechanical treatment.
- Steep slopes, when compared to prescribed burning, manual, or mechanical treatments.
- Soil compaction and surface disturbance, when compared to mechanical treatments.
- Noxious weed control, when compared to manual or mechanical treatments.

The HCRCD would research the best scenarios in which to utilize prescribed herbivory as advised above. The preferred livestock for herbivory in the project area would be goats, especially in areas with dense shrubs and forested areas. Cattle would also be used, especially in areas containing expansive acres of grassland. Goat and/or sheep herders would be contracted based on the size of the herd and specific needs based on aspects of the environment. Herds may be moved as often as every 1 to 3 days and one to two workers would be required on average to implement this treatment activity. Cattle grazing would be implemented from 3 to 12 months dependent upon forage and stocking rates.

2.3.6 Biomass Processing

Vegetation removed during implementation of the proposed treatments described above would primarily be processed using the following methods:

- Masticating (approximately 15 percent of biomass): Vegetative debris would be removed and placed on the ground concurrently with vegetation removal and the biomass remaining after mastication would be no more than 18 inches in depth.
- Pile and Burn (approximately 15 percent of treatment area): Vegetative debris would be arranged into piles (not to exceed 20 feet in length, width, or diameter) and burned.
- Air Curtain Burner (approximately 5 percent of biomass): Vegetative debris would be burned in a narrowly defined band using a high-temperature stream of air from a vehicle-mounted or stationary apparatus outfitted with both a high-powered blower (or fan system) and a burner (i.e., Burn Boss).
- Biochar Burner (approximately 5 percent of biomass): Vegetative debris would be piled into a designated pyrolysis chamber which uses a burner with limited oxygen to create biochar, which is a largely inert form of carbon (i.e., Char Boss). The remaining biochar would be no more than 6 inches in depth.

- Ring of Fire (approximately 5 percent of biomass): Following other treatment types such as prescribed burning and mechanical thinning, a controlled, circular burn would be utilized around remaining vegetative debris to eliminate leftover fuels by safely containing the fire within a well-defined perimeter.
- Chipping (approximately 15 percent of biomass): Chipped biomass would be spread over treatment areas and would not exceed 6 inches in depth.
- Lop and Scatter (approximately 20 percent of biomass): Cut vegetation would be scattered within the treatment area.

Invasive plant and noxious weed biomass will be treated onsite to eliminate seed and propagules or will be disposed of offsite at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds will not be chipped and spread onsite.

2.4 Treatment Prescriptions by Fuel Type

Traditional fuel reduction methods rely on treatment activities that are typically determined by fuel type, categorized as grassland, shrub, and tree fuel types.

The overarching treatment approach would follow these basic guidelines:

- Watercourses would be protected by a 50-foot mechanical treatment exclusion zone year-round. Biomass disposal methods, including cut and chipped vegetation and pile burning, would avoid watercourses, except where natural woody material is used in a limited and site-specific manner to stabilize banks, reduce erosion, or enhance habitat (e.g., gully stuffing). As mentioned above, these activities would be implemented only where appropriate and may require additional environmental review and approvals from applicable state and local agencies.
- Removal of invasive plants, unhealthy trees, and dead woody material would be prioritized before removing live native vegetation.
- Hazardous trees of any size (e.g., dead or dying trees) identified by a qualified professional may be removed, unless determined valuable for wildlife (e.g., nesting birds, cavity-nesting animals).
- Equipment used for mechanical treatment would avoid operating on slopes greater than 65 percent grade, or 50 percent grade where the erosion hazard rating is high or extreme, or that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake (see SPR GEO-7).
- No cleared timber or other forest products would be removed for commercial purposes.
- All treatment activities and biomass distribution, except for manual riparian thinning, would avoid riparian habitat by a standard minimum buffer of 50 feet from the top of bank. Buffer size would increase if recommended by a qualified biologist or registered professional forester based on factors such as slope, existing erosion, sensitivity of the vegetative habitat, or

presence of sensitive resources. For riparian thinning within the 50-foot exclusion zone, SPRs and MMs from the CalVTP EIR would be implemented to minimize potential impacts related to riparian habitat.

2.4.1 Grassland Fuel Type Prescription

Grass fuels may occur throughout portions of the project area within annual grassland, perennial grassland, wet meadow, and other herbaceous habitats identified under the California Wildlife Habitat Relationships (CWHR) system. Corresponding California natural communities documented or with potential to occur within the project area include, but are not limited to, wild oats and annual brome grasslands, cheatgrass–medusahead grassland, California poppy–lupine fields, red brome or Mediterranean grass grasslands, California brome–blue wildrye prairie, Idaho fescue–bluebunch wheatgrass–pine bluegrass grassland, Idaho fescue–California oatgrass grassland, Pampas grass patches, water foxtail meadows, and wet meadow communities associated with sedges and grasses such as Kentucky bluegrass–Redtop–creeping bentgrass meadows and Soft and western rush–sedge marshes (Sawyer et al. 2009). These habitats may contribute to the continuity of fine fuels that can facilitate wildfire ignition and spread under suitable conditions. These habitats may contribute to the continuity of fine fuels that can facilitate wildfire ignition and spread under suitable conditions.

Vegetation management within grass-dominated habitats would focus on reducing fine fuel loads and fuel continuity while maintaining the ecological function of grassland and meadow communities. Treatment methods may include mowing, targeted grazing, hand cutting, prescribed burning, and other approved vegetation management techniques. In areas where shrubs have encroached into grassland habitats, treatments may also include selective removal of woody vegetation to reduce fuel loading and interrupt fuel continuity.

Treatment activities would be designed to maintain the dominant habitat type and avoid vegetation type conversion. In areas containing sensitive natural communities, wetlands, wet meadows, fens, or special-status biological resources, treatment activities would be conducted in accordance with applicable avoidance and minimization measures. These activities would reduce wildfire risk while maintaining the ecological function and habitat values of grassland and meadow communities.

2.4.2 Shrub Fuel Type Prescription

Shrub fuel types may occur throughout the project area and are represented primarily by mixed chaparral and montane chaparral habitats identified under the CWHR system. Corresponding California natural communities documented or with potential to occur within the project area include, but are not limited to, Californian montane whitethorn–deerbrush chaparral, manzanita chaparral, ceanothus chaparral, shrub tanoak chaparral, leather oak chaparral, bush chinquapin chaparral, Sadler oak brush fields, tobacco brush or snow bush chaparral, poison oak scrub, and huckleberry oak chaparral (Sawyer et al. 2009). These habitats frequently occur in association with mixed conifer, Douglas-fir, montane hardwood, and woodland communities and may contribute to continuous horizontal and vertical fuel connectivity across the landscape.

Vegetation management within shrub-dominated habitats would focus on reducing hazardous fuel accumulations and fuel continuity while maintaining the ecological function and structural diversity of native shrub communities. Treatment methods may include hand cutting, manual thinning, prescribed burning, and selective removal of dead or overly dense woody vegetation. Treatments would be designed to reduce ladder fuels, create breaks in continuous shrub cover, and decrease the potential for high-intensity wildfire behavior.

Where feasible, treatments would retain a mosaic of shrub patches with variable canopy densities, age classes, and species composition to maintain habitat complexity and wildlife use. Treatment activities would be implemented in a manner that avoids vegetation type conversion and maintains the dominant shrub community. In areas containing sensitive natural communities or special-status biological resources, treatment activities would be conducted in accordance with applicable avoidance and minimization measures.

All treatments of shrub fuel types would be conducted in compliance with applicable laws, regulations, and CalVTP requirements related to chaparral management and prevention of vegetation type conversion.

2.4.3 Tree Fuel Type Prescription

Tree fuel types may occur throughout portions of the project area within coniferous forest, mixed conifer forest, hardwood forest, woodland, and mixed forest habitats identified under the CWHR system. Corresponding California natural forest and woodland communities documented within the project area include, but are not limited to, red alder forest, blue oak woodland and forest, California bay forest and woodland, Douglas-fir–tanoak forest–madrone forest and woodland, Bigleaf maple forest and woodland, Ponderosa pine forest and woodland, tanoak forest, mixed oak forest and woodland, Douglas-fir forest and woodland, Douglas-fir–incense cedar forest and woodland, ponderosa pine–incense cedar–Douglas-fir forest and woodland, western hemlock forest, Brewer spruce forest and woodland, Jeffrey pine forest and woodland, tanoak forest, Oregon white oak woodland and forest, California bay forest and woodland, Port Orford cedar forest and woodland, and ultramafic cypress woodland (Sawyer et al. 2009). These habitats may contribute to continuous horizontal and vertical fuel connectivity and can support wildfire spread under suitable conditions.

Vegetation management within tree-dominated habitats would focus on reducing hazardous fuel accumulation, decreasing ladder fuels, and reducing canopy fire potential while maintaining the ecological function and structure of native forest and woodland communities. Treatment methods may include manual thinning, pruning, hand cutting, prescribed burning, and selective removal of dead, dying, diseased, or overly dense vegetation. Where appropriate, treatments may also include reduction of understory vegetation and small-diameter trees that contribute to vertical fuel continuity. Manual treatment methods would be prioritized to preserve the natural appearance and ecological integrity of forested areas, especially in sensitive zones near riparian corridors or steep terrain. Where appropriate, mechanical equipment, targeted herbicide application, and prescribed burning may be used to achieve fuel reduction goals while maintaining habitat structure.

Treatment activities would be designed to retain the dominant forest or woodland habitat type and avoid vegetation type conversion. In areas containing sensitive natural communities, riparian habitats, wetlands, or special-status biological resources, treatment activities would be conducted in accordance with applicable avoidance and minimization measures. These activities would reduce wildfire risk while maintaining habitat values, ecosystem function, and long-term forest resilience.

2.5 General Treatment Implementation Guidelines

2.5.1 Timing of Initial Treatment and Duration

Project implementation of initial treatments is expected to start in September 2026 and continue over 10-15 years, or as funding is available. Seasonal delays could include an extended or extreme fire season, requiring redirection of resources to other projects, or an extended winter with wet soil conditions that temporarily halt large equipment use. Project activities would continue annually on a seasonal basis. Manual treatment activities would be permitted during saturated soil conditions.

2.5.2 Workers

The HCRCD, TCRCD, CAL FIRE crews, subcontractors, other government agencies or nonprofits, and private landowners would conduct all treatment activities. Crew sizes would vary and would typically be fewer than 25 workers per site, per day. Multiple crews could work at the same time.

2.5.3 Site Access and Conditions

Treatment areas would be accessed via existing fire roads, skid roads and trails. No new roads would be created. Vehicles and equipment would be staged at the contractor's yard daily or on site with landowner consent. Throughout the course of project implementation, the HCRCD would maintain road integrity, including maintaining drainage features. Garbage and construction debris would be regularly removed from all work sites.

2.5.4 Daily Treatment Schedule and Noise

All treatments would occur primarily on weekdays between 6:00 am and 7:00 pm, and during daylight hours only. If implementation of treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. During prescribed burning, crews may need to conduct some maintenance burning on weekends to manage overall smoke impacts. Noise-generating treatments would comply with local Noise Elements. The proposed treatments have been designed to be consistent with Humboldt and Trinity County Noise Elements.

2.5.5 Pests, Diseases, and Invasive Species

Without proper prevention, project treatments have potential to spread pathogens, diseases, pests, or invasive species. Invasive plants can be spread when crews and equipment travel between sites, transporting soil and mud contaminated with seeds. The goal of reducing invasive plant species within the project area is in conformity with the overall project goals of fuels reduction and wildfire

prevention. Regularly updated, scientifically established guidance for invasive plant control and treatments is located on the California Invasive Plant Council (Cal-IPC) website (Cal-IPC 2026). Within the project area, 37 species of invasive plants with an invasive rating of “High” were identified as occurring or having high potential to occur in the region and have the potential to spread within the project area or to off-site areas (Cal-IPC 2026). If any additional pests, diseases, or invasive species are identified throughout the course of the Project, they will be treated according to the Cal-IPC or other scientifically available guidance.

2.6 Proposed Revisions to CalVTP SPRs and Mitigation Measures

While the proposed treatment types and treatment activities are consistent with the CalVTP, the HCRCD has deemed that certain requirements of CalVTP SPRs are infeasible, are not warranted to maintain the impact significance conclusions in the PEIR, and, if implemented as presented in the PEIR, would prevent Humboldt and Trinity County RCDs from meeting treatment objectives. Because SPRs are part of the CalVTP and are incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP PEIR’s description of later project activities. Revision of a mitigation measure is also proposed to align with the proposed revisions to an associated SPR.

Proposed revisions to eight SPRs and one mitigation measure are described below. These proposed revisions would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the PEIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as described below.

2.6.1 SPR AQ-3 Create Burn Plan

SPR AQ-3, as presented in the CalVTP PEIR, requires preparation of a burn plan using the CAL FIRE burn plan template prior to prescribed burning treatment activities. Pursuant to SPR AQ-3, the burn plan would include a fire behavior model performed by a qualified fire behavior technical specialist, would minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion, and would be created with input from a qualified technician or certified State burn boss.

HCRCD proposes to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. The CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals (CAL FIRE 2019). The burn plan templates that would be used by the HCRCD contain all of these elements. In addition to these elements, the HCRCD may include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire

behavior modeling programs. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures.

Potential impacts resulting from revisions to SPR AQ-3 are discussed in Chapter 3, *Environmental Checklist*, under “Aesthetics and Visual Resources,” “Air Quality,” “Biological Resources,” “Geology, Soils, Paleontology, and Mineral Resources,” “Greenhouse Gas Emissions,” “Hydrology and Water Quality,” and “Wildfire.” As explained in these sections, the proposed revisions to SPR AQ-3 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions, because SPR AQ-3 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR AQ-3 are shown in underline and strikethrough in the MMRP (**Attachment A**).

2.6.2 SPR AQ-4 Minimize Dust

SPR AQ-4, as presented in the CalVTP PEIR, includes measures that the project proponent must implement to minimize dust. One of the measures requires that visible dust, silt, or mud tracked-out onto public paved roadways must be removed where sufficient water supplies exist, and that dust, silt, or mud on treatment vehicles be removed at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.

HCRCDC proposes to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the PEIR. This revision clarifies alignment of the measure with the requirements of Vehicle Code Section 23113 and is consistent with the purpose of SPR AQ-4 to avoid the creation of dust through treatment vehicles tracking out dust, silt, or mud.

Potential impacts resulting from revisions to SPR AQ-4 are discussed in Chapter 3 under “Air Quality” and “Biological Resources.” As explained in these sections, the proposed revisions to SPR AQ-4 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions, because SPR AQ-4 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR AQ-4 are shown in underline and strikethrough in the MMRP (**Attachment A**).

2.6.3 SPR AQ-6 Prescribed Burn Safety Procedures

SPR AQ-6, as presented in the PEIR, requires non-CAL FIRE crews to implement all safety procedures required of CAL FIRE crews. This includes implementation of an approved Incident Action Plan (IAP), and outlines the elements required in the IAP.

To maintain personnel and public safety, the HCRCDC proposes to prepare IAPs that include elements appropriate for the size and scope of the burn. IAP elements may include burn organization and assignments, prescribed fire objectives and prescription, description of the

prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. All assigned personnel for a prescribed burn will be briefed to ensure personnel safety and convey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement an IAP and all required burn safety procedures. This change would clarify and tailor this measure for project-specific implementation purposes while maintaining the original intent and complying with safety requirements during prescribed burns.

Potential impacts resulting from revisions to SPR AQ-6 are discussed in Chapter 3 under “Air Quality.” As explained in this section, the proposed revisions to SPR AQ-6 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions, because SPR AQ-6 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR AQ-6 are shown in underline and strikethrough in the MMRP (Attachment A).

2.6.4 SPR GEO-1 Suspend Disturbance During Heavy Precipitation

SPR GEO-1, as presented in the PEIR, requires that the project proponent suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated.

The HCRCD proposes to suspend mechanical, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities resulting in loss of traction and spinning of tires or tracks. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Potential impacts resulting from revisions to SPR GEO-1 are discussed in Chapter 3 under “Biological Resources,” “Geology, Soils, Paleontology, and Mineral Resources,” and “Hydrology and Water Quality.” As explained in these sections, the proposed revisions to SPR GEO-1 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions, because SPR GEO-1 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR GEO-1 are shown in underline and strikethrough in the MMRP (Attachment A).

2.6.5 SPR HAZ-3 Require Fire Extinguishers

SPR HAZ-3, as presented in the PEIR, requires that tree cutting crews or machine operators carry one fire extinguisher per chainsaw or piece of heavy equipment, and requires that each vehicle be equipped with the one long-handled shovel and one axe or Pulaski, consistent with PRC Section 4428.

The HCRCD proposes to require tree cutting crews to carry a minimum of one backpack pump-type fire extinguisher filled with water and enough firefighting tools for each worker at each job site. This includes that each vehicle must carry the required hand tools for firefighting and one fire extinguisher, consistent with PRC Section 4428. This revision clarifies alignment of the measure with the requirements of PRC Section 4428 and is consistent with the purpose of SPR HAZ-3 to equip treatment crews with adequate firefighting tools to minimize the risk of wildfire during treatments. This revision would not reduce the effectiveness of the measure regarding addressing safety and wildfire.

Potential impacts resulting from revisions to SPR HAZ-3 are discussed in Section 3 under “Wildfire.” As explained in this section, the proposed revisions to SPR HAZ-3 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts to other resources would not occur as a result of this revision, because SPR HAZ-3 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR HAZ-3 are shown in underline and strikethrough in the MMRP (Attachment A).

2.6.6 SPR AD-4 Public Notifications for Prescribed Burning

SPR AD-4, as presented in the PEIR, requires that at least 3 days prior to prescribed burning the project proponent post signs along the closest public roadway to the treatment area, publish a public interest notification in a local newspaper or other widely distributed media source, and send a notification letter to the local county supervisor describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape.

The HCRCD proposes to post signs along the closest public roadway to the treatment area at least one day prior to the commencement of prescribed burning operations to encourage greater visibility due to increased sign theft associated with posting length. In addition, the HCRCD would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; and contact project neighbors via telephone calls at least three days prior to prescribed burning. The HCRCD proposes these revisions to tailor SPR AD-4 to include public outreach mechanisms that have proven to be successful in their community. These revisions are consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatments.

Potential impacts resulting from revisions to SPR AD-4 are discussed in Chapter 3 under “Aesthetics,” and “Air Quality.” As explained in these sections, the proposed revisions to SPR AD-4 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of this revision, because SPR AD-

4 is not required to reduce environmental effects to any other resources from implementation of the Project. The proposed revisions to SPR AD-4 are shown in underline and strikethrough in the MMRP (Attachment A).

2.7 Treatment Maintenance

Maintenance, or retreatment, of the areas treated under the Proposed Project could include the same treatment types (i.e., ecological restoration, WUI fuel reduction, fuel breaks) and treatment activities (i.e., prescribed burning, prescribed herbivory, mechanical treatments, manual treatments, herbicide application) as described above for the initial treatments. Retreatment would be dependent on regrowth conditions and would differ by location. However, retreatment is anticipated to occur between 3 and 10 years.

Prior to implementing a maintenance treatment, the project proponent or implementing entity will verify that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum will be considered by the project proponent in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new or substantially more severe impacts may occur, the project proponent will determine whether a new PSA/Addendum or other environmental analysis is warranted.

In addition to verifying that the PSA/Addendum continues to provide relevant CEQA coverage for treatment maintenance, the project proponent will update the PSA at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA/Addendum or the latest PSA/Addendum update. For example, the project proponent may conduct a reconnaissance survey to verify conditions are substantially similar to those anticipated in the PSA/Addendum. Updated information should be documented.

3 Environmental Checklist

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Lower Trinity River Vegetation Treatment Program
2. **Project Proponent Name and Address:** Humboldt County Resource Conservation District (HCRCD), 5630 South Broadway, Eureka, CA 95503
3. **Contact Person Information and Phone Number:** Jill Demers; jill@hcrcd.org; 707-296-3992
4. **Project Location:** In the Willow Creek area of Humboldt County and Salyer and Hawkins Bar in Trinity County.
5. **Total Area to Be Treated (acres):** 37,739.26 acres
6. **Description of Project:** The Proposed Project would involve conducting fuel reduction vegetation management activities on 37,739.26 acres in the Greater Willow Creek areas of Humboldt and Trinity Counties. See Chapter 2, above, for an expanded Project Description.

a. Initial Treatment

See Chapter 2 for an expanded Project Description.

Treatment Types

- ☒ Wildland-Urban Interface Fuel Reduction
- ☒ Fuel Break
- ☒ Ecological Restoration

Treatment Activities

- ☒ Prescribed Burning (Broadcast), 37,739.26 acres
- ☒ Prescribed Burning (Pile Burning), 37,739.26 acres
- ☒ Mechanical Treatment, 28,393.47 acres
- ☒ Manual Treatment, 37,739.26 acres
- ☒ Prescribed Herbivory, 1,250.55 acres
- ☒ Herbicide Application, 31,413.47 acres

Fuel Type

- ☒ Grass Fuel Type
- ☒ Shrub Fuel Type
- ☒ Tree Fuel Type

- b. Treatment Maintenance:** Per Section 2, above, following initial project activities, ongoing vegetation treatment maintenance would be managed by individual landowners with technical support and oversight from the HCRCD and TCRCD. Maintenance would align with the original treatment methods but may be adjusted based on site response and changing vegetation conditions. Activities may include low-intensity manual treatments, especially in areas previously treated with intensive methods like prescribed burning. The HCRCD and TCRCD would monitor treated areas, coordinate with landowners to prioritize maintenance zones, and ensure defensible space is preserved.

7. Regional Setting and Surrounding Land Uses: The Project would be implemented on private lands in the vicinity of Willow Creek in Humboldt County and Salyer and Hawkins Bar in Trinity County, collectively known as the Greater Willow Creek area and often considered a distinct region for fire prevention. The communities of Willow Creek, Salyer, and Hawkins Bar are rural and unincorporated communities with an approximate combined population of 2,500. The Greater Willow Creek area sits within the Six Rivers National Forest and is situated along the Trinity River.

8. Other Public Agencies Whose Approval is Potentially Required:

- Smoke Management Plan approval from NCUAQMD
- Burn permit from NCUAQMD
- Burn permit from CAL FIRE
- Waste discharge requirement from the North Coast Regional Water Quality Control Board (RWQCB)
- Encroachment permits from local public works departments
- Informal consultation with California Department of Fish and Wildlife (CDFW)
- Informal consultation with U.S. Fish and Wildlife Service (USFWS)
- Pesticide application permit from Humboldt County Agricultural Commissioner

Coastal Act Compliance

- ☒ The proposed project is NOT within the Coastal Zone
- ☐ The proposed project is within the Coastal Zone (*check one of the following boxes*)
- ☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
- ☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

- 9. Native American Consultation.** For treatment projects that are within the scope of the PEIR, Assembly Bill (AB) 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the PEIR. For treatment projects with impacts not within the scope of the PEIR, pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, project proponents preparing a new negative declaration, mitigated negative declaration, or EIR must notify any California Native American tribe who has submitted written request for notification of a project in the area of the treatment site. Upon written request for consultation by a tribe, the project proponent must begin consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.

Pursuant to SPR CUL-2, an updated Native American contact list and sacred lands file search was obtained from the Native American Heritage Commission (NAHC). The sacred lands data file indicated positive results for known sacred sites to occur within the project area or adjacent lands. On June 17, 2026, a letter was sent via certified mail to the 26 tribal contacts provided by the NAHC that requested any additional information regarding tribal resources and to notify the HCRCD if the Tribe has any information or concerns related to the Project. Additionally on June 22, 2026, that letter was emailed to each recipient who provided an email address. As of the filing date, no responses have been received. As planning proceeds, the HCRCD will continue to consult with interested tribal representatives regarding the Project and incorporate their concerns into Project planning and mitigation as warranted.

DETERMINATION (To be completed by the project proponent)

On the basis of this PSA and the substantial evidence supporting it:

- ☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

Signature

Date

Printed Name

Title

Agency

3.1 Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	Less than Significant (LTS)	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AES-2, AQ-2, AQ-3, and REC-1	N/A	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AD-4, AES-1, and AES-3, and REC-1	N/A	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	Significant and Unavoidable (SU)	Impact AES-3, pp. 3.2-25 – 3.2-27	Yes	N/A	MM AES-3	SU	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AES-1

The Project would involve manual treatment (including thinning in riparian areas), mechanical treatment (such as mowing, chipping and masticating), prescribed burning (broadcast and pile), herbicide application, prescribed herbivory, and biomass disposal. The potential for these treatment activities to result in short term substantial degradation of visual character was examined in the PEIR and found to be less than significant.

Portions of the treatment area would be visible from public roads, in and around the project site. However, due to the topography of the area, and the presence of existing development or vegetation, it is likely that substantial portions of the treatment area would not be visible from neighboring public roads. The closest officially designated state scenic highway is State Route (SR) 101 near False Klamath, approximately 43 miles to the northwest of the treatment areas (California Department of Transportation 2018). There are two state scenic highways which are eligible for designation which pass through parts of the project area, SR 299 and SR 96 (California Department of Transportation 2018). Additionally, Trinity County Scenic Byway, a nationally designated scenic byway, runs through the project area along SR 299 (U.S. Forest Service [USFS] 2025). There are no additional scenic areas designated by Humboldt County on or in close proximity to the project area. Although not included in the project footprint, the Trinity River, a designated wild and scenic river, passes through the project site, and the segment to the south of the project site is considered to have scenic values (National Wild and Scenic Rivers 2026). The visual character in the vicinity of the treatment areas is largely characterized by undeveloped forested and grassy areas and developed rural communities. Viewers in the vicinity of the treatment areas would be mostly residents, passing motorists, or employees of local businesses.

Consistent with the PEIR, the presence of large equipment could contrast with the natural environment where publicly visible, such as adjacent to a public trail or roadway. However, project treatment activities would be temporary and implementation of SPR AES-2 would avoid and minimize visual impacts from the presence of treatment equipment. Herbicide application would be at ground level and with workers continuously moving, visibility in any given location would be brief. Livestock used for prescribed herbivory would not substantially impact scenic values as they are an inherent component of natural landscapes. Smoke from prescribed burning could be visible from public viewpoints, SR 299, SR 96, and SR 101; however, SPRs AQ-2 and AQ-3 would reduce the generation and visibility of smoke. Project activities would also not substantially degrade the

existing visual character or quality of an area given that the treatment activities would be limited in geographic extent. The potential for the Project to result in short term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities and types of equipment proposed for use are consistent with those analyzed in the PEIR. SPRs applicable to the proposed treatments are AES-2, AQ-2, and REC-1, which require that: treatment-related equipment be stored outside of the public viewshed; require submittal of a Smoke Management Plan if the prescribed burning triggers the threshold (17 California Code of Regulations [CCR] Section 80160); and require notification of recreational users of any temporary recreation area closures.

In addition, the HCRCD proposes to revise SPR AQ-3 which is also applicable to this impact. SPR AQ-3 would be revised to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures. This is discussed in more detail in Section 2.5, “Proposed Revisions to CalVTP SPRs and Mitigation Measures.” For the reasons described, the proposed revisions to SPR AQ-3 would not result in a substantially more severe significant effect related to smoke or aesthetics than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within, adjacent to, and outside of the treatable landscape; therefore, the short-term aesthetic impact would also be the same, as described above. The impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-2

Initial and maintenance treatments would include fuel breaks, ecological restoration, and WUI fuel reduction treatment types. The potential for these treatment types to result in long term degradation of the visual character of an area was examined in the PEIR and found to be less than significant. Treatments would occur on both public and private lands.

Consistent with the CalVTP, proposed project treatments (i.e., fuel reorganization and reduction) could be implemented through various combinations of treatment activities proposed under the would result in changes to the visual character of the area. However, mature vegetation would remain in place to provide partial screening of treatment areas and overall, these methods would largely preserve the natural appearance of the area and would therefore not substantially affect views, particularly with the implementation of SPR AES-1. Further, as described in the PEIR, prescribed burning would result in grasses temporarily changing color from green or brown to dark gray/black. Grass would regrow during the following spring, so this change would be temporary.

Please refer to the discussion under Impact AES-1 for an analysis of aesthetic impacts during treatment activities using mechanical and manual treatments and controlled burns.

As described in Impact AES-1, it is likely that portions of the treatment area would not be visible from any public vantage points due to distance, existing vegetation and topography. The aesthetic impacts of the proposed treatments would be temporary and short term, and the natural characteristics of the treatment areas would remain following treatment. SPRs applicable to the proposed treatments are SPRs AES-1, and AES-3, and REC-1, that treatment area edges are feathered to create a natural transitional appearance, that vegetation screening is provided within and adjacent to treatment areas, and should any temporary recreation area closures be required, recreational users would be notified.

In addition, the HCRCD proposes to revise SPR AD-4 which is also applicable to this impact. SPR AD-4 would be revised to post signs along the closest public roadway to the treatment area at least one day prior to the commencement of prescribed burning operations to encourage greater visibility due to increased sign theft associated with posting length. In addition, the HCRCD would implement other public notifications as appropriate, potentially including any of the following: host public meetings; post notices on local, public bulletin boards; and contact project neighbors via telephone calls at least three days prior to prescribed burning. This revision is consistent with the purpose of SPR AD-4 to make a good faith effort to notify the local community in advance of prescribed burning treatments. This is discussed in more detail in Section 2.5, “Proposed Revisions to CalVTP SPRs and Mitigation Measures.” For these reasons, the proposed revisions to SPR AD-4 would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the PEIR.

The proposed treatment activities are consistent with those analyzed in the PEIR; therefore, the potential for Project activities to result in long term substantial degradation of the visual character of the project area is within the scope of the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact would also be the same as that within the treatable landscape, as described above. The impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-3

As discussed in more detail in Chapter 2, *Project Description*, areas identified as unshaded fuel breaks are areas identified in vegetation mapping as containing primarily shrubs and grassland, and no existing tree canopy. While it is not anticipated that trees would be removed in these areas, and while these areas are limited compared to the areas using shaded fuel breaks, the removal of all vegetation in areas visible to the public could result in a substantial visual change, particularly along highway routes. The implementation of MM AES-3 as described in the PEIR, would require additional consideration to reduce the visual impact of unshaded fuel breaks where they are visible to the public. Overall, while there is a limited amount of space dedicated to unshaded fuel breaks,

and it is not anticipated that tree removal would be required, given the proximity to local roadways with identified scenic values, the impact of the Project is consistent with the PEIR and would remain significant and unavoidable.

New Aesthetic and Visual Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (per Sections 3.2.1, “Environmental Setting,” and 3.2.2, “Regulatory Setting,” in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts would be the same and, for the reasons described above, impacts of the Project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

3.2 Agriculture and Forestry Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	NA	NA	No	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AG-1

The vegetation communities in the project area include conifer forest, montane hardwood-conifer, montane chaparral, grassland, and riparian habitat. There is no farmland within the project area. However, the project area does include land designated as timberland and zoned for timber production (see “Land Use and Planning, Population and Housing” [Humboldt County 2026, Trinity County 2026]). The proposed treatment types within the project area are ecological restoration, WUI fuel reduction, and fuel breaks. The PEIR evaluated the potential for these treatments to result in forest land loss and determined the impact to be less than significant. This is because the proposed activities—such as thinning and burning—are intended to enhance forest health and

reduce wildfire risk, without converting forest land to non-forest uses or changing its long-term ecological function. Any potential impacts related to forest land conversion fall within the scope of the PEIR, as the treatments are consistent with those previously analyzed.

Implementation of the treatment types in the project area would alter forested land through selective thinning, vegetation removal, and burning. Tree cover within woodlands and forested areas remaining after treatment would be consistent with the definition of forest land used in PRC Section 12220(g): land that can support 10 percent native tree cover of any species under natural conditions. The Project would not remove trees for commercial purposes and would not result in conversion of the dominant vegetation types. Therefore, the Project would not result in loss of forest land or conversion of forest land to non-forest use. This impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. Within the project area, existing conditions within forested land are essentially the same within and outside of the treatable landscape. Therefore, the impact to forested land is also the same. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is present within the project area (California Department of Conservation [CDOC] 2026); therefore, no conversion of farmland would occur. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

Treatments included in the Project are consistent with the treatments and activities that are considered in the PEIR. The project proponent has considered the site-specific characteristics of the Project and determined that they are consistent with the environmental and regulatory settings stated in the PEIR (Volume II, Sections 3.3.1 and 3.3.2). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

3.3 Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-1, AD-4, AQ-1 through AQ-4, AQ-6	MM AQ-1	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	AQ-1, HAZ-1, NOI-4, NOI-5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	AQ-4 and AQ-5	NA	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4, AQ-1, AQ-2, AQ-3, AQ-6	NA (no feasible mitigation available)	SU	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	HAZ-1, NOI-4, NOI-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4, AQ-1, AQ-2, AQ-3, AQ-6	NA (no feasible mitigation available)	SU	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AQ-1

The use of vehicles, mechanical equipment, herbicides, prescribed herbivory, and prescribed burning during initial and maintenance treatments would generate emissions of criteria air pollutants that could exceed applicable California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) within the North Coast Air Basin. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was evaluated in the CalVTP PEIR and determined to be potentially significant. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed in the PEIR.

The Project is located within unincorporated Humboldt County and western Trinity County and would be subject to the applicable air quality standards and thresholds established for the North Coast Air Basin. Although the Project area is predominantly rural, nearby communities, including Willow Creek, Salyer, and Hawkins Bar, as well as private residences and other sensitive receptors, are located within and adjacent to treatment areas and could experience temporary exposure to air pollutant emissions. The PEIR evaluated the potential for treatment activities to result in substantial short-term increases in criteria pollutant emissions and concluded that these impacts would be potentially significant and unavoidable, due the Program's possible adverse effects to air quality on both a regional level and local level and the resulting health effects that could be experienced by exposed receptors. This determination is applicable to the Project because the Project would result in the generation of criteria pollutants through travel on dirt roads and through prescribed burning activities. However, the nature and intensity of the proposed activities are less than or equal to those analyzed in the PEIR.

SPRs applicable to this Project include AD-1, AD-4, and AQ-1 through AQ-6. These SPRs require, among other measures, public notification for prescribed burning; compliance with applicable air quality regulations of the North Coast Unified Air Quality Management District; preparation and submittal of a Smoke Management Plan (SMP) and Burn Plan, as required pursuant to 17 CCR Section 80160; implementation of dust minimization measures; avoidance of naturally occurring asbestos (NOA), and adherence to all applicable safety procedures for prescribed fire operations.

The HCRCD and cooperating agencies would implement these SPRs and have made minor project-specific refinements to SPR AQ-3, AQ-4, AQ-6, and AD-4 to facilitate effective implementation for the Project. As described in Section 2.5, these refinements do not alter the intent of the SPRs and would not result in new or substantially more severe environmental impacts beyond those evaluated in the PEIR.

In addition, the Project would implement Mitigation Measure AQ-1 identified in the PEIR. However, due to funding constraints typical of public agency projects, full implementation of all feasible emission reduction strategies, such as exclusive use of equipment meeting the United States Environmental Protection Agency Tier 4 emission standards, renewable diesel fuel, or electric equipment, not be practicable in all cases. Additionally, while carpooling would be encouraged where feasible; logistical constraints associated with multiple contractors may limit its implementation. The HCRCD and cooperating agencies would document the extent to which Mitigation Measure AQ-1 is implemented by agency staff and contractors. Renewable diesel would be used where required by state regulations and where feasible. As concluded in the PEIR, even with implementation of applicable SPRs and Mitigation Measure AQ-1, this impact would remain significant and unavoidable.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and the relevant air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-2

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR and found to be less than significant. Diesel particulate matter (PM) emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5, which require complying with air quality regulations, maintaining equipment, locating staging areas away from sensitive receptors, and limiting equipment idling time, respectively.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. Approximately 5,170.53 acres of the 37,739.26-acres are located outside the CalVTP treatable landscape in the proposed treatment area. The inclusion of these additional lands does not substantially affect the duration of treatment activities as they progress across treatment sites as described in the PEIR, and, thus, diesel PM generated by treatment activities would not take place near any single sensitive receptor

for an extended period. Additionally, within the boundary of the project area, the air quality conditions and types of sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within or adjacent to the treatable landscape. Therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-3

NOA, typically associated with ultramafic rock and serpentine soils, has the potential to be present within limited portions of the project area. Review of available mapping from the U.S. Geological Survey (U.S. Geological Survey [USGS] 2011, 2017) indicates that NOA, ultramafic rock outcrops, and serpentine soils are expected to be limited and not widespread within the project area; however, small, localized occurrences may be present.

Ground-disturbing activities associated with proposed vegetation treatments, including mechanical treatment, equipment use, and biomass processing, have the potential to disturb soils and generate fugitive dust emissions that could contain NOA, if present. Exposure to airborne asbestos fibers may pose a health risk to workers and nearby sensitive receptors within and adjacent to the project area.

The potential for vegetation treatment activities to generate fugitive dust emissions containing NOA was evaluated in the PEIR and determined to be less than significant due to the temporary and infrequent nature of the proposed treatments within potential ultramafic and serpentine soils. This impact is within the scope of the PEIR because the types of ground-disturbing activities, equipment use, and treatment methods proposed are consistent with those analyzed programmatically.

SPRs applicable to this impact for the Project include AQ-4 and AQ-5. SPR AQ-4 requires implementation of dust control measures to minimize fugitive dust emissions during treatment activities. SPR AQ-5 requires avoidance and minimization measures for NOA, including identification of NOA-containing areas and implementation of appropriate controls to reduce exposure risk. As discussed under Impact AQ-1, the HCRCD and cooperating agencies would implement all applicable SPRs and have made minor project-specific refinements to SPR AQ-4 to facilitate effective implementation. As described in Section 2.5, these refinements do not alter the intent or effectiveness of the SPRs and would not result in new or substantially more severe impacts beyond those evaluated in the PEIR.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. Approximately 5,170.53 acres of the 37,739.26-acres are located outside the CalVTP treatable landscape in the proposed treatment area. The inclusion of these additional lands does not substantially introduce substantially more area of serpentine or ultramafic soils to the treatable landscape that may introduce new hazards compared to those described in the PEIR. Additionally, within the boundary of the project area, the air quality and soil conditions, and types of sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within or adjacent to the treatable landscape. Therefore, the air quality impact is also the same, as described

above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants (TACs). The potential to expose people to TACs from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and within the North Coast Air Basin, air quality conditions are consistent with those analyzed in the PEIR for Humboldt and Trinity counties. Therefore, the potential for exposure to TACs is also within the scope of the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs; however, this impact would remain significant and unavoidable, as explained in the PEIR.

The HCRCD and cooperating agencies would implement these SPRs and have made minor project-specific refinements to SPR AQ-3, AQ-6, and AD-4 to facilitate effective implementation for the Project. As described in Section 2.5, these refinements do not alter the intent or effectiveness of the SPRs and would not result in new or substantially more severe environmental impacts beyond those evaluated in the PEIR.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and the relevant air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-5

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the exposure potential and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are HAZ-1, NOI-4, and NOI-5, which would require equipment maintenance, limiting vehicle idling time to 5 minutes, and notification of off-site sensitive receptors.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and types of sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within, or adjacent to, the

treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-6

Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burn treatment and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this Project are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs; however, this impact would remain significant and unavoidable, as explained in the PEIR.

The HCRCD and cooperating agencies would implement these SPRs and have made minor project-specific refinements to SPR AQ-3, AQ-6, and AD-4 to facilitate effective implementation for the Project. As described in Section 2.5, these refinements do not alter the intent of the SPRs and would not result in new or substantially more severe environmental impacts beyond those evaluated in the PEIR.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and types of sensitive receptors in the areas outside the treatable landscape are essentially the same as those within, or adjacent to, the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Air Quality Impacts

The proposed treatments are consistent with the treatment types and activities covered in the PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the PEIR (refer to Sections 3.4.1, "Regulatory Setting," and 3.4.2, "Environmental Setting," in Volume II of the Final PEIR). The inclusion of 5,170.53 acres of the 37,739.26 acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they are immediately adjacent to each other, the air basin is the same, and the treatment activities and associated air emissions are the same. Therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas

outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. No new impact related to air quality that is not covered in the PEIR would occur. Therefore, no new impact related to air quality would occur.

3.4 Archaeological, Historical, and Tribal Cultural Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	CUL-1, CUL-7, CUL-8	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-8	CUL-2	LTS with MM	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

The methods performed for this report included a background records search consistent with SPR CUL-1, notifications to local Native American representatives consistent with SPR CUL-2 and cultural resource research consistent with SPR CUL-3. A records search was requested at

the Northwest Information Center (NWIC) to determine whether any portions of the project area had been previously surveyed for cultural resources and to identify the presence of any previously recorded cultural resources within the project area including a 100-foot buffer (search radius). Due to the size of the project area, only geospatial data reflecting the locations of previously recorded resources and previously conducted studies were requested to provide the basis for planning decisions and provide general sensitivity at this stage of project planning. The records search was received on June 25, 2026 (NWIC File No. 25-1672). Other sources of information that were reviewed included, but were not limited to, the current listings of properties on the National Register of Historic Places (NRHP), California Historical Landmarks, California Register of Historical Resources (CRHR), California Points of Historical Interest as listed in the Office of Historic Preservation's (OHP's) Historic Property Directory, and the Built Environment Resource Directory for Humboldt County (OHP 2025).

The records search identified 43 previously recorded cultural resources and 123 prior cultural resource studies within the project area. An additional three resources and three studies were identified within a 100-foot search radius. The relatively high number of previously recorded cultural resources (43 sites) and extensive prior study coverage (123 reports) within the project area indicates that the region has been the subject of substantial cultural resource investigation. Indeed, approximately 13,560 acres of the 37,739 acres (or 36%) within the project area have been previously subject to cultural resource investigation. However, despite this level of prior effort, the density of recorded sites, particularly in a landscape associated with major river systems and Tribal cultural use, suggests that additional unidentified cultural resources are likely to occur, especially in areas that have not been intensively surveyed or where subsurface deposits may occur.

Review of available records indicates that the resources have not been formally evaluated for eligibility for listing in the CRHR or NRHP. In addition, eight resources include incomplete or ambiguous age classifications, indicating that both the composition of the cultural resource base and its significance remain only partially understood. As such, the potential for additional unidentified and unevaluated cultural resources within the project area remains high.

Impact CUL-1

The Project includes vegetation treatment activities such as manual thinning, mechanical treatment, grazing, prescribed burning, and herbicide application.

The potential for vegetation treatment activities that cause ground disturbance to cause adverse effects to historical resources (those resources evaluated as eligible for listing in the CRHR) was examined in the PEIR and found to be less than significant. Of the 43 resources identified in the NWIC results, 12 resources are classified as built environment resources, including buildings, engineered water conveyance systems, transportation features, and other constructed elements that retain structural or engineering characteristics consistent with built environment classification. Review of available records indicates that these resources have not been formally evaluated for eligibility for listing in the CRHR or NRHP.

Any impact to potential historical resources (i.e., those that potentially qualify for listing in the CRHR) including, but not limited to structures, buildings, or foundations, would be avoided due to the lack of any proposed demolition or material alteration of a structure or building or overall setting, in accordance with SPR CUL-7. This potential impact is within the scope of the PEIR, because the treatment activities and the intensity of ground disturbance that would occur under the Project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. As described above, archaeological and historical resource record searches have been conducted in accordance with SPR CUL-1. SPR CUL-7 requires the avoidance of known built historical resources and the avoidance of built-environment structures that have not yet been evaluated for historical significance and SPR CUL-8 requires worker training regarding protection of historical resources.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. This impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-2

Vegetation treatment activities would include mechanical treatments that use heavy equipment that could result in ground disturbance as vegetation is removed, which could result in adverse impacts to unknown historical resources (archaeological sites) or unique archaeological resources if present within a treatment area. Review of NWIC records search data identified 43 previously recorded cultural resources within the project area.

Of the 43 total resources identified, 31 resources are classified as archaeological resources, that include seven pre-contact archaeological sites, 10 post-contact resources, and five multi-component sites containing both pre-contact and post-contact components. In addition, a subset of nine archaeological structures have been recorded, such as trails, ditches, and remnant features that, although sometimes recorded as “structures,” function as archaeological features rather than built environment resources due to their lack of standing integrity or engineered complexity. Review of available records indicates that these resources have not been formally evaluated for eligibility for listing in the CRHR or NRHP.

The potential for vegetation treatment activities to result in inadvertent discovery and damage to unknown archaeological or subsurface cultural resources was evaluated in the CalVTP PEIR. At the program level, this impact was determined to be significant and unavoidable due to the large geographic scope of the treatable landscape and the inherent possibility that unknown buried resources could be encountered and inadvertently damaged during ground-disturbing activities.

Consistent with the PEIR, the Project incorporates an avoidance-first strategy that includes pre-activity records review, sensitivity-based planning, and pre-implementation surveys, as well as establishment of environmentally sensitive areas (ESAs) and implementation of standard inadvertent discovery procedures. Based on the results of the records search, which identified 43 previously recorded cultural resources within the project area -including a mix of prehistoric, historic-era, and multi-component sites, all of which appear to remain unevaluated -the potential for additional undiscovered resources is considered moderate to high in certain portions of the project area.

Implementation of the required SPRs and mitigation measures is expected to avoid or minimize impacts to known and newly identified resources. However, because the presence and extent of buried archaeological deposits cannot be fully known prior to ground disturbance, there remains a residual risk that previously unidentified resources could be inadvertently discovered and damaged. As such, consistent with the conclusions of the PEIR, this impact remains significant and unavoidable.

The potential for treatment activities to result in disturbance to, damage to, or destruction of archaeological resources was examined in the PEIR and found to be significant. This impact would be less than significant for the Project with implementation of SPRs and mitigation. This impact is within the scope of the PEIR because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-1 through CUL-5 and CUL-8. As described above, methods consistent with SPRs CUL-1 through CUL-3 have been implemented for the purposes of this PSA. However, as planning proceeds and more specific areas of treatment are defined, SPRs CUL-4 through CUL-8 shall be implemented. MM CUL-2 would also apply to this treatment to protect any inadvertent discoveries of archaeological resources.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. This impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-3

Consistent with CalVTP SPR CUL-2, an updated Native American contact list and sacred lands file search was obtained from the NAHC on May 21, 2026. The sacred lands data file indicated that sacred sites are present in the study area. The HCRCD sent certified mail letters to each contact on June 17, 2026, that requested information on any known Tribal Cultural Resources within the project area. A follow up email was also sent on June 22, 2026, to each contact that provided an email address.

To date, no response has been received. The potential for treatment activities to cause a substantial adverse change in the significance of a Tribal Cultural Resource was examined in the PEIR. Proposed treatment activities include manual and mechanical treatment activities that may require ground disturbance, as well as the potential use of herbicides, which may adversely affect ethnobotanicals or material culture that may have Tribal importance. The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a Tribal Cultural Resource during vegetation treatment was examined in the PEIR and found to be less than significant with the implementation of SPR CUL-6.

As planning proceeds, additional information provided by Tribes during the consultation process may identify the potential for a substantial adverse change to a Tribal Cultural Resource to result from project-related actions, and measures to protect the resource shall be formulated consistent with SPR CUL-6, which, upon implementation, would avoid any substantial adverse change to any Tribal Cultural Resource. The potential for adverse effects on Tribal Cultural Resources during implementation of the Project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are CUL-1 through CUL-6 and CUL-8. SPRs CUL-1 through CUL-4 have been conducted during preparation of this PSA. SPR CUL-5 and CUL-6 require consulting with the geographically affiliated Tribes to avoid and protect any resources identified, and SPR CUL-8 requires worker training regarding the protection of sensitive archaeological, historical, and Tribal Cultural Resources.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential for Tribal Cultural Resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to Tribal Cultural Resources is also the same, as described above. This impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-4

Vegetation treatment activities would include mechanical treatments that use heavy equipment that could result in ground disturbance as vegetation is removed, which could uncover human remains, if present in a treatment area. The potential for treatment activities to uncover human remains was examined in the PEIR and found to be less than significant. The review of the NWIC records search did not identify any recorded burial sites or documented occurrences of human remains within the project area. This impact is within the scope of the PEIR because the intensity of ground disturbance under the Project is consistent with what was analyzed in the PEIR. Additionally, consistent with the PEIR, the Project would comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 in the event of a discovery.

The inclusion of land that is outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary

of the project area, the potential for discovery of human remains present in the areas outside the treatable landscape is essentially the same as those within the treatable landscape; therefore, the potential impact to human remains is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The project treatments are consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics of the Project and determined they are consistent with the applicable environmental and regulatory conditions presented in the PEIR (refer to Sections 3.5.1, “Environmental Setting,” and 3.5.2, “Regulatory Setting,” in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a changed circumstance to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing environmental and regulatory conditions pertinent to archaeological, built historical resources, or Tribal Cultural Resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new or substantially more severe significant impacts. Therefore, no new impact related to archaeological, historical, or Tribal Cultural Resources would occur.

3.5 Biological Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131–3.6.138	Yes	BIO-1, BIO-2, BIO-3, BIO-6, BIO-7, BIO-9, AQ-3, AQ-4, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-4, HYD-5	BIO-1a, BIO-1b, BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	BIO-1, BIO-2, BIO-3, BIO-4, BIO-6, BIO-9, BIO-10, BIO-11, BIO-12, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-1, HYD-4, HYD-5	BIO-2a, BIO-2b, BIO-2c, BIO-3a, BIO-3b, BIO-3c BIO-4	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186–3.6-191	Yes	BIO-1, BIO-2, BIO-3, BIO-4, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7,	BIO-3a, BIO-3b, BIO-3c	LTSM	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
				HAZ-5, HAZ-6, HYD-4				
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191–3.6-192	Yes	BIO-1, HYD-1, HYD-3, HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192–3.6-196	Yes	BIO-1, BIO-4, BIO-10, BIO-11, HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	BIO-1, BIO-2, BIO-3, BIO-4, BIO-12, HYD-4		LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD-3	NA	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	NA	NA	No Impact	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Pursuant to SPR BIO-1, a qualified biologist conducted a data review of the biological resources setting, species and sensitive natural communities tables, and habitat information in the PEIR for the ecoregion of the project area. The project area is located in the Klamath Mountains and North California Coast Ranges ecoregion described in the PEIR. A reconnaissance-level survey of biological resources in the project area was completed April 8-9, 2026. Habitat and vegetation types were identified using data modeled by CAL FIRE's Fire and Resource Assessment Program (FRAP), which was verified by aerial imagery and field observations during the biological reconnaissance survey (CAL FIRE 2024). A list of special-status plant and wildlife species with potential to occur in the project area was compiled by reviewing the following pertinent literature and database queries:

- USFWS Information for Planning and Conservation (IPaC) list of federally endangered and threatened species (USFWS 2026b);
- USFWS Critical Habitat Portal (USFWS 2026a);
- National Marine Fisheries Service (NMFS) Species and Habitat Mapper (NMFS 2026);
- National Wetland Inventory (NWI) results (USFWS 2026c);
- National Oceanic and Atmospheric Administration (NOAA) West Coast managed species list (NOAA 2026);
- A query of the CDFW California Natural Diversity Database (CNDDDB) for special-status species occurrence records within 5 miles of the project area (CDFW 2026a);
- A query of the CDFW Spotted Owl Observations Database for occurrence records within 5 miles of the project area (CDFW 2026b);
- A query of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants for special-status plant species records within the 27 USGS 7.5-minute quadrangles surrounding and encompassing the project area: Bald Hills, Blue Lake, Big Bar, Board Camp Mountain, Del Loma, Denny, Grouse Mountain, Hennessy Peak, Hoopa, Hopkins Butte, Hupa Mountain, Hyampom Mountain, Ironside Mountain, Korbel, Jim Jam Ridge, Lord-Ellis Summit, Maple Creek, Panther Creek, Rodgers Peak, Salmon Mountain, Salyer, Sims Mountain, Sportshaven, Tish Tang Point, Trinity Mountain, Weitchpec, and Willow Creek (CNPS 2026);
- CAL FIRE FRAP vegetation data (CAL FIRE 2024);
- CDOC Geologic Map of California (CDOC 2015);
- eBird records from the project area vicinity (Cornell Lab of Ornithology 2026);
- iNaturalist observations from the project area vicinity (iNaturalist 2026); and
- Aerial photography (Google Earth 2026).

Database reviews resulted in a list of 40 special-status plant species and 25 special-status wildlife species known to occur in the general region of the project area. A full list of all special-status species reviewed, along with habitat descriptions and an assessment of their potential to occur in the project area is included under Appendix C of Attachment B, *Biological Resources Report*. For

each species, the potential to occur in the project area was assessed as present, possible, not expected, or none. Species determined to be present or have the potential to occur (i.e., possible, or not expected) are listed below in **Table 2**. Thirty-three special-status plant species and 21 special-status wildlife species were determined to be present or potentially occur within the project area.

Pursuant to SPR BIO-1, sensitive natural communities, sensitive habitats, and other vegetation communities within the project area were identified using CAL FIRE's FRAP vegetation layer, aerial imagery (Google Earth 2026) and field observations. Based on the California Wildlife Habitat Relationship Systems, vegetation communities within the project area include annual grassland, perennial grassland, blue oak–foothill pine, closed-cone pine–cypress, coastal oak woodland, Douglas fir, Jeffrey pine, Klamath mixed conifer, mixed chaparral, montane chaparral, montane hardwood, montane hardwood–conifer, Ponderosa pine, montane riparian, valley foothill riparian, and wet meadow. Additional land covers within the project area include barren, cropland, deciduous orchard, irrigated hayfield, irrigated row and field crops, lacustrine, riverine, pasture, rice, and urban. Additionally, serpentine soil is present in the western portion of the project area (CDOC 2015). Refer to Attachment B, *Biological Resources Report*, for additional information.

Table 2. Special-Status Plant and Wildlife Species with Potential to Occur within the Project Area

Table 2a. Special-Status Plant Species

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Astragalus umbraticus</i> Bald Mountain milk-vetch	-/-2B.2	perennial herb	Cismontane woodland, lower montane coniferous forest. Dry open oak and pine woodlands; sometimes on roadsides. 690–4,000 feet in elevation. Blooms May–August.	Possible. One historic CNDDDB occurrence recorded in 1883 is mapped in the project area along Highway 299. The record indicates the exact location is unknown and it needs more fieldwork (CDFW 2026a). The most recent CNDDDB occurrence from 2016 is mapped approximately 5 miles outside of the project area indicates this species was found in a disturbed site with intercoastal conifer forest (CDFW 2026a). Ponderosa pine, montane-hardwood and montane hardwood-conifer habitats located in the project area are suitable for this species. This species may be found in open areas, especially along roadsides.
<i>Bensoniella oregona</i> bensoniella	-/SR/1B.1	perennial herb	Mesic sites in bogs and fens, Lower montane coniferous forest (openings), Meadows and seeps. 2,955 to 4,595 feet elevation. Blooms May to July.	Possible. Five CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 1990 and is mapped approximately 2.6 miles east of the project area (CDFW 2026a). Habitat for this species is limited in the project area, but present. During the site visit, a few small meadows were observed. A few wet meadows are mapped in the project area via CAL FIRE FRAP data.
<i>Botrypus virginianus</i> rattlesnake fern	-/-2B.2	perennial herb	Bogs and fens, lower montane coniferous forest, meadows and seeps, riparian forest. Streambanks. 2,340–4,610 feet in elevation. Blooms June–September.	Possible. One CNDDDB occurrence from 1992 is mapped approximately 3.75 miles south of the project area. Suitable habitat is present for this species along numerous streams located throughout the project area.
<i>Buxbaumia viridis</i> green shield-moss	-/-2B.2	moss	Lower montane coniferous forest, upper montane coniferous forest, subalpine coniferous forest. Well-rotted	Possible. While there are no mapped CNDDDB occurrences within 5 miles of the project area, moist conifer forest likely containing well-rotted logs is present in the project area.

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			logs and in peaty soil and humus. 980–7,300 feet in elevation.	
<i>Carex arcta</i> northern clustered sedge	-/-/2B.2	perennial herb	Bogs and fens, North Coast coniferous forest. Mesic sites. 195 to 4,595 feet elevation. Blooms June to September.	Possible. Three CNDDDB occurrences are mapped within 5 miles of the project area. A 2015 occurrence is mapped approximately 2.75 miles west of the project area. The record indicates the plants observed are growing in a pond (CDFW 2026a). Additional CNDDDB occurrences in the area also record this species growing in a pond or wet, marshy area (CDFW 2026a). A few ponds/wet meadows were observed during the site visit and wet meadows are documented by CAL FIRE FRAP data in the project area. It is also possible this species may occur at additional mesic sites such as seeps or along creeks.
<i>Carex praticola</i> northern meadow sedge	-/-/2B.2	perennial herb	Meadows and seeps. Moist to wet meadows. 50–10,500 feet in elevation. Blooms May–July.	Possible. One CNDDDB occurrence from 1982 is mapped approximately 2 miles south of the project area. The record indicates this species was observed in a “springy spot near road under a drain (CDFW 2026a).” A few ponds/wet meadows were observed during the site visit, and wet meadows are documented by CAL FIRE FRAP data in the project area. Additional seeps that may be present in the project area may provide suitable habitat for this species.
<i>Chaenactis suffrutescens</i> Shasta chaenactis	-/-/1B.3	perennial herb	Lower montane coniferous forest, upper montane coniferous forest. Unstable, sandy to rocky, serpentine soils, scree, drainages. 2,460–9,190 feet in elevation. Blooms May–September.	Possible. Serpentine soil is present in the western portion of the project area (Figure 7; CDOC 2015). While there are no CNDDDB occurrences within five miles of the project area, suitable habitat is present in open, serpentine habitat on ridgetops as seen in aerial imagery (Google Earth 2026).

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Cornus unalaschkensis</i> bunchberry	-/-/ 2B.2	perennial rhizomatous herb	North coast coniferous forest, bogs and fens, meadows and seeps. 290–6,300 feet in elevation. Blooms May–July.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The most recent CNDDDB occurrence from 1992 is mapped approximately 2.4 miles north of the project area. The record indicates this species was observed on the north side of a creek (CDFW 2026a). This species may be present in wet meadows and mesic areas near or along waterways throughout the project area.
<i>Epilobium oreganum</i> Oregon fireweed	-/-/ 1B.2	perennial herb	Bogs and fens, meadows and seeps, lower montane coniferous forest, upper montane coniferous forest. In and near springs and bogs; at least sometimes on serpentine. 1,640–7,350 feet in elevation. Blooms June–September.	Possible. Four CNDDDB occurrences are mapped within 5 miles of the project area. The nearest two CNDDDB occurrences, both from 1979, are mapped approximately 2 and 4 miles south and east of the project area, respectively. The record indicates one occurrence is in conifer forest habitat near a meadow, and the other occurrence is streamside in conifer forest. This species may be present in wet meadows and mesic areas near or along waterways throughout the project area.
<i>Erigeron maniopotamicus</i> Mad River fleabane daisy	-/-/ 1B.2	perennial herb	Meadows and seeps (open and dry), lower montane coniferous forest. Open slopes, disturbed areas (road cuts); tan-colored, rocky soils. 4,200–4,938 feet elevation.	Not expected. No CNDDDB occurrences within 5 miles of the project area and the project area is located outside the known elevation range for this species. While there are disturbed areas and rocky soils present in the project area, based on the known elevation range of this species, there is low likelihood it will occur.
<i>Erythronium oregonum</i> giant fawn lily	-/-/ 2B.2	perennial herb	Cismontane woodland, meadows and seeps. Openings. Sometimes on serpentine; rocky sites. 950–4,710 feet in elevation. Blooms March–June.	Possible. Three CNDDDB occurrences overlap the project area on the western side. During the site visit, biologists observed a large population of <i>Erythronium</i> species in an open, moist area along the road in Klamath mixed conifer and montane hardwood-conifer habitat. Biologists were unable to identify to a species level. Suitable habitat is present throughout the project area.

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Erythronium revolutum</i> coast fawn lily	-/-/ 2B.2	perennial bulbiferous herb	Bogs and fens, broadleafed upland forest, north coast coniferous forest. Mesic sites; streambanks. 200–4,610 feet in elevation. Blooms March–July.	Possible. Two CNDDDB occurrences overlap the project area in the center and on the western side. During the site visit, biologists observed a large population of <i>Erythronium</i> species in an open, moist area along the road in Klamath mixed conifer and montane hardwood-conifer habitat. Biologists were unable to identify to a species level. Suitable habitat is present in mesic sites and along streambanks in the project area.
<i>Gentiana plurisetosa</i> Klamath gentian	-/-/ 1B.3	perennial herb	Meadows and seeps, upper montane coniferous forest, lower montane coniferous forest. Mesic sites. 3,930–6,240 feet in elevation. Blooms July–September.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, wet meadows observed during the site visit and mapped by CAL FIRE FRAP data are present in limited areas in the project area. In addition, mesic sites associated with seeps or along waterways in the project area may be suitable for this species.
<i>Gilia capitata</i> ssp. <i>pacifica</i> Pacific gilia	-/-/ 1B.2	annual herb	Coastal bluff scrub, chaparral (openings), coastal prairie, valley and foothill grassland. Steep slopes, ravines, open flats, or coastal bluffs, grassland, dunes. 10–4,410 feet in elevation. Blooms April–August.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 2011 and is mapped approximately 0.25 mile west of the project area. The record indicates 150 plants were observed on a south facing cut bank.
<i>Glyceria grandis</i> American manna grass	-/-/ 2B.3	perennial rhizomatous herb	Bogs and fens, meadows and seeps, marshes and swamps. Wet meadows, ditches, streams, and ponds, in valleys and lower elevations in the mountains. 196–6,709 feet.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, suitable habitat is present in select locations throughout the project area. Wet meadows and ponds observed during the site visit and mapped by CAL FIRE FRAP data are present. In addition, mesic sites associated with seeps or along waterways in the project area may be suitable for this species.

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Iliamna latibracteata</i> California globe mallow	-/-/ 1B.2	perennial herb	North Coast coniferous forest (mesic), chaparral, lower montane coniferous forest, riparian scrub (streambanks). 200–6,560 feet in elevation. Blooms June–August.	Possible. One historic CNDDDB occurrence from 1936 is mapped to the project area, but the exact location is unknown, and the site needs additional fieldwork to confirm if the species is present (CDFW 2026a). Mesic sites associated with seeps or along waterways in the project area may be suitable for this species.
<i>Juncus regelii</i> Regel's rush	-/-/ 2B.3	perennial rhizomatous herb	Montane meadows. 2,490–6,235 feet in elevation. Blooms August.	Possible. One CNDDDB occurrence from 1992 is mapped approximately 3.3 miles southeast of the project area. This species is limited to montane meadows; there are a few montane meadows mapped in the project area by CAL FIRE FRAP data that could provide suitable habitat.
<i>Kopsiopsis hookeri</i> small groundcone	-/-/ 2B.3	perennial rhizomatous herb (parasitic)	North coast coniferous forest. Open woods, shrubby places, generally on Gaultheria shallon. 390–4,710 feet in elevation. Blooms April–August.	Possible. One CNDDDB occurrence from 1978 is mapped approximately 0.5 mile northeast of the project area. The record indicates the species was growing on madrone in dense forest litter in mixed evergreen forest (CDFW 2026a). Suitable habitat is present in the project area.
<i>Lewisia cotyledon</i> var. <i>heckneri</i> Heckner's lewisia	-/-/ 1B.2	perennial herb	Lower montane coniferous forest. Rocky places. 740–6,890 feet in elevation. Blooms May–July.	Possible. Two sensitive CNDDDB occurrences are mapped overlapping the project area. The record indicates the species was growing on exposed granitic rock (CDFW 2026a). Rock outcrops are recorded in the project area (Natural Resources Conservation Service [NRCS] 2026). Though limited, it is possible this species may occur in rocky areas in the project area.
<i>Microseris borealis</i> northern microseris	-/-/ 2B.1	perennial herb	Bogs and fens, meadows and seeps, lower montane coniferous forest. Wet meadows, sphagnum bogs. 45-1070 m.	Possible. One CNDDDB occurrence is located just over 5 miles southwest of the project area. The record indicates this species was found in mossy wet places in cold open meadow (CDFW 2026a). This species may be found in limited areas (wet meadows) within the project area.
<i>Montia howellii</i> Howell's montia	-/-/ 2B.2	annual herb	Meadows and seeps, north coast coniferous forest,	Possible. Two CNDDDB occurrences overlap in the project area. One CNDDDB occurrence record

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			vernal pools. Meadows, North Coast coniferous forest, vernal pools, vernal mesic soils, moist lowland areas. Sometimes on roadsides. 30–3,300 feet in elevation. Blooms March–May.	from 1929 indicates that the species is extirpated due to construction of CA-299. The second CNDDDB occurrence is from 2004 and records more than 20,000 plants behind the Hawkins Bar Store within the project area (CDFW 2026a). Additional CNDDDB occurrences in the area record the species along the road in pullouts and parking areas where soil is compacted and remains wet and puddled into mid-spring (CDFW 2026a). This species may be found throughout the project area along access roads or in mesic sites.
<i>Oenothera wolfii</i> Wolf's evening-primrose	-/-/ 1B.1	perennial herb	Coastal bluff scrub, coastal dunes, coastal prairie, lower montane coniferous forest. Sandy substrates; usually mesic sites. 0–2,630 feet in elevation. Blooms May–October.	Not expected. While there is one historic CNDDDB occurrence from 1949 mapped to the project area, the record indicates the site needs further investigation as it is far inland for this species to occur and may be erroneous (CDFW 2026a).
<i>Packera bolanderi</i> var. <i>bolanderi</i> seacoast ragwort	-/-/ 2B.2	perennial rhizomatous herb	Coastal scrub, north coast coniferous forest. Sometimes along roadsides. 98–3,001 feet.	Not expected. There are no CNDDDB occurrences within 5 miles of the project area. This species is generally known to occur along the coast (Trock 2012).
<i>Phacelia leonis</i> Siskiyou phacelia	-/-/ 1B.3	annual herb	Upper montane coniferous forest, meadows and seeps. Sandy flats, slopes, sometimes on serpentine. 3,930–6,560 feet in elevation. Blooms June–August.	Not expected. The majority of the project area is outside the known elevation range of this species. No CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is mapped over 5 miles east of the project area and records indicate this species was observed in sandy, moist soil by a stream in the open at 6,400 feet elevation (CDFW 2026a). This species may be located in higher elevations in the project area in serpentine areas in the western portion of the project area (CDOC 2015).

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Piperia candida</i> white-flowered rein orchid	-/-/ 1B.2	perennial herb	North Coast coniferous forest, lower montane coniferous forest, broadleafed upland forest. Open to shady sites. Sometimes on serpentine. 150–5,300 feet in elevation. Blooms May–September.	Possible. One CNDDDB occurrence from 2005 overlaps the southern portion of the project area. The record indicates the species was observed on a gentle slope with a slight northern aspect; the ground was littered with tanoak leaves and small woody debris. Suitable habitat is present for this species throughout the project area.
<i>Ramalina thrausta</i> angel's hair lichen	-/-/ 2B.1	fruticose lichen (epiphytic)	North coast coniferous forest. On dead twigs and other lichens. 246-4560 feet.	Possible. One CNDDDB occurrence from 1972 was mapped approximately 1.9 miles south of the project area. Suitable habitat is present for this species throughout the project area.
<i>Rosa gymnocarpa</i> var. <i>serpentina</i> Gasquet rose	-/-/ 1B.3	perennial rhizomatous shrub	Chaparral, cismontane woodland. Serpentine. Often on roadsides, sometime on ridges, streambanks, and in openings. 1,190–7,320 feet in elevation. Blooms April–June.	Possible. Serpentine soil is present in the western portion of the project area (Figure 7; CDOC 2015). While there are no CNDDDB occurrences within five miles of the project area, suitable habitat is present in open, serpentine habitat on ridgetops or along roadsides as seen in aerial imagery (Google Earth 2026).
<i>Sanguisorba officinalis</i> great burnet	-/-/ 2B.2	perennial rhizomatous herb	Bogs and fens, meadows and seeps, broadleafed upland forest, marshes and swamps, north coast coniferous forest, riparian forest. Rocky serpentine seepage areas and along streams. 16 – 4593 feet elevation.	Possible. There is one CNDDDB occurrence from 2012 mapped approximately four miles southwest of the project area. Serpentine soil is mapped in the project area (Figure 7; CDOC 2015) and based on USEPA waters data (USEPA 2025), waterways intersect serpentine areas within the project area. Therefore, suitable habitat for this species is present in the project area.
<i>Schoenoplectus subterminalis</i> water bulrush	-/-/ 2B.3	perennial rhizomatous herb (aquatic)	Montane lake margins, in shallow water. Streams low in nutrients. 2,460–7,380 feet in elevation. Blooms June–August.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, suitable stream habitat is present.

Scientific Name Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Sidalcea malviflora</i> ssp. <i>patula</i> Siskiyou checkerbloom	-/-/ 1B.2	perennial rhizomatous herb	Coastal bluff scrub, coastal prairie, north coast coniferous forest. Open coastal forest; roadcuts. 16-4117 feet.	Possible. Three CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 2019 and is mapped approximately 1.9 miles southwest of the project area. Suitable habitat is present throughout the project area.
<i>Sidalcea oregana</i> ssp. <i>eximia</i> coast checkerbloom	-/-/ 1B.2	perennial herb	Meadows and seeps, north coast coniferous forest, lower montane coniferous forest. Near or in meadows, in gravelly soil. 10–5,920 feet in elevation. Blooms June–August.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. A 2007 CNDDDB occurrence is mapped approximately 4.5 miles south of the project area. The record indicates the species was observed along margins of a spring-fed pond (CDFW 2026a). Suitable habitat is limited in the project area based on site visit observations and mapped CAL FIRE FRAP vegetation data.
<i>Streptanthus oblancheolatus</i> Trinity River jewelflower	-/-/ 1B.2	perennial herb	Cismontane woodland. Cliffs, canyon walls in conifer forest. 65-1377 feet.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The most recent CNDDDB occurrence is from 2009 and is mapped approximately 1.4 miles south of the project area. The record indicates the species was observed on a steep bluff along CA-299. This species may be present along steep slopes in the project area including along the Trinity River, CA-299, CA-96, and other roadways.
<i>Thermopsis robusta</i> robust false lupine	-/-/ 1B.2	perennial rhizomatous herb	North Coast coniferous forest, broadleaved upland forest. Ridgetops; sometimes on serpentine. 1,200–4,610 feet in elevation. Blooms May–July.	Possible. Six CNDDDB occurrences are mapped within 5 miles of the project area. The nearest occurrence is from 2019 and is mapped approximately 4 miles west of the project area. Suitable habitat may be present on ridgetops throughout the project area.

* List of Abbreviations for Species Status follow below:

SR = State Rare (California)

CA Rare Plant Rank

1B.1 = Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California

1B.2 = Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California

<i>Scientific Name</i> Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
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1B.3 = Plants rare, threatened, or endangered in California and elsewhere; not very threatened in California

2B.1 = Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California

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

2B.3 = Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California

Source: California Department of Fish and Wildlife (CDFW). 2026. California Natural Diversity Database.

Table 2b. Special-Status Wildlife Species

Invertebrates

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Bombus occidentalis</i> western bumble bee	-/SC	Once common throughout much of its range, in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Possible. While no CNDDB occurrence overlaps the project area, there are three CNDDB occurrences from 1968, 1969 and 2013, mapped within 5 miles of the project area (CDFW 2026a). The 2013 occurrence is mapped approximately 4.5 miles south of the project area, on the west side of Six Rivers National Forest (CDFW 2026a). This species is known to nest in a variety of habitats though overwintering sites are not well understood (Xerces Society 2023). Western bumble bee may occur throughout the project area due to the presence of suitable habitat.

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Bombus suckleyi</i> Suckley's Cuckoo bumble bee	FPE-	Pacific coast from Alaska to far northern California, east to Nebraska. In California, this species has a very limited distribution, occurring only in the Klamath Mountain region in the northern part of the state. An inquiline in the colonies of other bumblebees. Adult food plant genera include Aster, Centaurea, Cirsium, Trifolium, Chrysothamnus, Helichrysum.	Possible. The project area occurs in the Klamath Mountain region where this species is known to occur. This species is also dependent on host colonies for survival and is known to take over western bumble bee colonies (USFWS 2024). Considering it is possible for western bumble bee to occur, it is likely this species may occur as well.
<i>Danaus Plexippus</i> Monarch butterfly	FPT/-	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Possible/None (Roosting). The project area is not within the overwintering range for this species (NatureServe; Xerces Society 2015). However, this species feeds and breeds on a variety of milkweed plants which may be present in open woodland and grassland habitat throughout the project area.

Amphibians

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Ascaphus truei</i> Pacific tailed frog	-/SSC	Occurs in montane hardwood-conifer, redwood, Douglas-fir & ponderosa pine habitats. Restricted to perennial montane streams. Tadpoles require water below 15 degrees C.	Possible. Four CNDDB occurrences from 1984, 1985 and 2006 overlap the project area. The most recent CNDDB occurrence from 2006 is mapped to the general area of the town of Willow Creek. The record indicates one individual was photographed in the vicinity. Multiple perennial montane streams such as Supply Creek, Three Creek, Fourmile Creek and Campbell Creek are present in the project area and provide suitable habitat for this species (CDFW 2026a; USEPA 2026).
<i>Rana aurora</i> northern red- legged frog	-/SSC	Humid forests, woodlands, grasslands, & streamsides in northwestern California, usually	Possible. One CNDDB occurrence from 2016 is mapped to the project area on the east side of the Trinity River. The record indicates one adult was observed in 2016 (CDFW 2026a). The Trinity and South Fork Trinity Rivers, as well as

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
		near dense riparian cover. Generally near permanent water, but can be found far from water, in damp woods and meadows, during non-breeding season.	tributaries and perennial streams throughout the project area provide suitable habitat for this species.
<i>Rana boylei</i> pop. 1 foothill yellow- legged frog - north coast DPS	-/SSC	Partly-shaded, shallow streams & riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	Present. Over 10 CNDDDB occurrences for foothill yellow-legged frog overlap the project area. Suitable breeding habitat for this species is located in the Trinity and South Fork Trinity River and its tributaries, as well as Redwood Creek and associated tributaries. CNDDDB records are mapped to the Trinity and South Fork Trinity rivers as well as Ammon Creek, Madden Creek and Fourmile Creek (CDFW 2026a). Foothill yellow-legged frog may also use intermittent and ephemeral creeks/drainages in the project area to disperse and overwinter. During the biological reconnaissance survey, what appeared to be foothill yellow-legged frogs were observed in the South Fork Trinity River 50 feet outside of the project area (Figure 8).
<i>Rhyacotriton variegatus</i> southern torrent salamander	-/SSC	Coastal redwood, Douglas-fir, mixed conifer, montane riparian, and montane hardwood-conifer habitats. Old growth forest. Cold, well-shaded, permanent streams and seepages, or within splash zone or on moss-covered rock within trickling water.	Possible. Over 10 CNDDDB occurrences for southern torrent salamander are mapped overlapping the project area. Perennial creeks within the project area provide suitable habitat for this species. CNDDDB occurrences in the project area are mapped to Boise Creek, Cedar Creek, Coon Creek drainage and a roadside seep (CDFW 2026a). A few CNDDDB occurrences are also mapped in the vicinity of the Trinity River (CDFW 2026a).

Reptiles

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Actinemys marmorata</i> northwestern pond turtle	FPT/SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams & irrigation ditches with aquatic vegetation below 6000 ft elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland	Possible. Northwestern pond turtle is known to occur in the South Fork of the Trinity River, which intersects the project area. A 2006 CNDDDB occurrence records 1 to 20 adults and juveniles found at 31 sites between 2005 and 2006 (CDFW 2026a). Additional CNDDDB occurrences in proximity to the project area are mapped to Big Lake and unnamed ponds within approximately 2 miles of the South Fork of the Trinity River (CDFW 2026a). Suitable habitat for northwestern pond turtle exists in the project area within the Trinity River,

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
		habitat up to 0.5 km from water for egg-laying.	South Fork Trinity River, and nearby ponds and tributaries of the Trinity River; habitat here consists of open banks and basking structures.

Fish

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Oncorhynchus clarkii</i> coast cutthroat trout	/SSC	Small coastal streams from the Eel River to the Oregon border. Small, low gradient coastal streams & estuaries. Need shaded streams with water temps <18C, & small gravel for spawning.	Possible. One CNDDDB occurrence from 1995 is mapped approximately 1.4 miles west of the project area. The occurrence is mapped to Redwood Creek and its tributaries (CDFW 2026a). Minor Creek, a tributary of Redwood Creek, overlaps the northwestern portion of the project area (Environmental Protection Agency 2025). Tributaries along the Trinity River may also provide suitable habitat for this species, although this species is more likely to be found in lower reaches closer to the coast and may not occur as far south as the South Fork Trinity River.
<i>Oncorhynchus mykiss irideus</i> pop. 48 steelhead - northern California DPS summer-run	FT/SE	Naturally spawning population of the stream-maturing summer-run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution within range more limited. Require cool water (<23C); holding habitat to withstand higher temps; lower flows in summer/fall; require loose gravels at pool tails for redd construction. Favor cool, clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	Possible. One CNDDDB occurrence from 2019 is mapped to Redwood Creek, approximately 2.5 miles west of the project area. Minor Creek, a perennial tributary of Redwood Creek, overlaps the northwest portion of the project area and may provide suitable habitat for this species.
<i>Oncorhynchus mykiss irideus</i> pop. 49	FT/-	Naturally spawning population of the ocean-maturing winter-run ecotype. From Redwood Creek watershed south to and inclusive	Possible. One CNDDDB occurrence from 2011 is mapped to Redwood Creek and its tributaries, including Minor Creek, which overlaps the northwestern portion of the project area (CDFW 2026a). Suitable habitat is present in the project area for this species.

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
steelhead - northern California DPS winter-run		of Gualala River watershed. Distribution throughout range. Adults require high flows of 18-20 cm for passage and loose gravels at pool tails. Juveniles favor areas with cool (10-17 C), clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	
<i>Oncorhynchus tshawytscha</i> pop. 30 chinook salmon - upper Klamath and Trinity Rivers ESU	FC/ST	Spring-run chinook in the Trinity River and the Klamath River upstream of the mouth of the Trinity River. Major limiting factor for juvenile chinook salmon is temperature, which strongly affects growth and survival.	Possible. One CNDDDB occurrence from 1999 is mapped to the Trinity River at the center of the project area. The record indicates that based on the timing, the fish observed include both spring and fall run fish (CDFW 2026a).

Birds

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Astur atricapillus</i> American goshawk	-/SSC	Within, and in vicinity of, coniferous forest. Uses old nests and maintains alternate sites. Usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees.	Possible. Two historic CNDDDB occurrences from 1979 and 1983 were mapped overlapping the project area. The 1979 occurrence indicates the nest is no longer active, however, the 1983 occurrence indicates the nest is located in an unsurveyed area (CDFW 2026a). Suitable nesting habitat is located throughout the project area, particularly in dense forest habitat in the southern, southwestern, and northwestern portion of the project area.
<i>Brachyramphus marmoratus</i> Marbled murrelet	FT/-	Feeds near-shore; nests inland along coast from Eureka to Oregon border & from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas-fir.	Possible. Although there are no CNDDDB occurrences recorded within 5 miles of the project area (CDFW 2026a), western portions of the project area are mapped directly adjacent to USFWS final critical habitat for marbled murrelet. In California, marbled murrelet is generally known to nest within 25 miles of the coast (USFWS 2016). Portions of the project area west of CA-299 may be within the known nesting radius for marbled murrelet.

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Haliaeetus leucocephalus</i> bald eagle	-/SE	Ocean shore, lake margins, & rivers for both nesting & wintering. Most nests within 1 mi of water. Nests in large, old-growth, or dominant live tree w/open branches, especially ponderosa pine. Roosts communally in winter.	Present. Although there is only 1 CNDDDB occurrence from 1997 for bald eagle mapped approximately 0.35 miles south of the project area, there are numerous iNaturalist records of bald eagle nests along the Trinity and South Fork Trinity River (iNaturalist 2026). In addition, there are CDFW Bald Eagle Observations (CDFW 2019) mapped along the Trinity and South Fork Trinity River. The Trinity River and South Fork Trinity River provide suitable foraging habitat for this species and nests may occur within 1 mile of the river. Although there are potentially fish-bearing perennial streams in the project area, bald eagles prefer open water to forage. Nest sites are generally chosen with a clear view of water where they forage (USFWS 2007). Considering the denser tree canopy cover of tributaries and additional perennial streams in the project area, there is high likelihood bald eagle nests will be concentrated within 1 mile of the Trinity and South Fork Trinity Rivers.
<i>Strix occidentalis caurina</i> Northern spotted owl	FT/-	Old growth forests or mixed stands of old-growth and mature trees. Occasionally in younger forests with patches of large trees. High, multistory canopy dominated by large trees, many trees with cavities or broken tops, woody debris, and space under canopy.	Possible. There are a total of 3,944 positive and activity center (a location or point representing 'the best of' detections such as nest stands, stands used by roosting pairs or territorial singles, or concentrated nighttime detections) CDFW observations within 5 miles of the project area (CDFW 2026b). Some of these observations overlap the project area. Of these observations, 637 are recorded nests (CDFW 2026b). Additionally, portions of the project area are directly adjacent to USFWS final critical habitat for this species. Suitable foraging, roosting, and breeding habitat is present in most of the project area.

Mammals

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Arborimus pomo</i> Sonoma tree vole	-/SSC	North coast fog belt from Oregon border to Sonoma Co. In Douglas-fir, redwood & montane hardwood-conifer forests. Feeds almost exclusively on Douglas-fir needles. Will occasionally take	Possible. One CNDDDB occurrence from 1994 overlaps the western portion of the project area. The CNDDDB record indicates one nest site was observed (CDFW 2026a). Suitable habitat within Douglas fir and montane hardwood-conifer is dominant throughout the project area.

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
		needles of grand fir, hemlock or spruce.	
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	-/SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls & ceilings. Roosting sites limiting. extremely sensitive to human disturbance.	Not expected. One CNDDDB occurrence from 1951 is mapped within 5 miles of the project area. This species prefers open roosting areas and are not known to roost in cracks and crevices (National Park Service 2020). Roosting habitat includes abandoned structures, mines, and caves.
<i>Gulo gulo luscus</i> North American wolverine	FT/-	Found in the north coast mountains and the Sierra Nevada. Found in a wide variety of high elevation habitats. Needs water source. uses caves, logs, burrows for cover & den area. Hunts in more open areas. Can travel long distances	Not expected. One CNDDDB occurrence from 1966 is mapped approximately one mile east of the project area (CDFW 2026a). In 2023, a sighting of a wolverine was confirmed in the Eastern Sierra Nevada Mountains in the Inyo National Forest and Yosemite National Park (CDFW 2023). In the last 100 years, only two wolverines have been observed in California (CDFW 2023). While there is suitable habitat in the project area, there is low potential for this species to occur.
<i>Pekania pennanti</i> Fisher	-/SSC	Intermediate to large-tree stages of coniferous forests & deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs & rocky areas for cover & denning. Needs large areas of mature, dense forest.	Possible. There are 59 CNDDDB occurrences mapped within 5 miles of the project area, with numerous occurrences overlapping the project area. A majority of the project area is located in suitable habitat for this species and includes denning habitat.

Mollusks

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
<i>Monadenia infumata setosa</i> Trinity bristle snail	-/ST	Known only from along a few streams in the Trinity River drainage. Juveniles are found under bark of standing dead	Possible. While this species was initially thought to have very limited range along the Trinity River, recent research indicates Trinity bristle snail's range extends farther than initially recorded (CDFW 2005). Three CNDDDB occurrences from 2015 are mapped approximately 4 to 4.5 miles southeast and south of the project area. The occurrences are mapped along the Trinity River;

Scientific Name Common Name	Listing Status* (Federal/State)	Habitat	Potential to Occur in the Project Area
		broadleaf trees, and the species may require this habitat.	Trinity bristle snails were relocated to the southernmost record due to roadwork impacts (CDFW 2026a).

* Abbreviations for Federal and State Species Status:

FE = Federal endangered

FT = Federal threatened

FC = Federal candidate

FPT = Federal proposed threatened

FPE = Federal proposed endangered

SE = State endangered

ST = State threatened

SC = State candidate

SSC = Species of special concern (CDFW)

FP = Fully protected (CDFW)

Source: CDFW 2026a; CDFW 2026b.

Impact BIO-1

Literature and database reviews resulted in a list of 40 special-status plant species known to occur in the region. Table 2 summarizes the habitat requirements and evaluates the potential for each species to occur within the project area. Based on the results of the reconnaissance-level surveys and existing habitat, 33 of the 40 special-status plant species were determined to have potential to occur within the project area.

There are known CNDDDB occurrences of six of these species within the project area: Bald Mountain milk-vetch, giant fawn lily, coast fawn lily, Heckner's lewisia, Howell's montia, and white-flowered rein orchid. During the biological reconnaissance survey, biologists observed a large population of *Erythronium* species in an open, moist area adjacent to a roadway within Klamath mixed conifer and montane hardwood-conifer habitat; however, the plants could not be identified to a species level. The biological reconnaissance survey was conducted outside of the blooming period for a variety of special-status plant species, and the survey did not include full coverage of the entire treatment area.

Treatment activities that have potential to alter the project area, such as burning, mechanical and manual treatments, herbicide use, and prescribed herbivory, may result in direct or indirect adverse effects to special-status plant species. The potential for adverse effects to special-status plants is within the scope of the activities and impacts addressed in the PEIR because the proposed treatment activities and associated disturbance levels are consistent with those previously evaluated. Although treatment activities may indirectly or directly impact special-status plant species through habitat modifications, they may also improve habitat conditions by reducing invasive plant species, restoring the natural fire return interval, clearing debris build-up, and thinning the tree canopy.

The following SPRs would be implemented to minimize impacts to special-status plant species:

- BIO-1 (conducting a data review and reconnaissance-level survey)
- BIO-2 (environmental resource training for all personnel)
- BIO-3 (protocol-level survey for sensitive natural communities and sensitive habitats)
- BIO-6 (prevent spread of plant pathogens)
- BIO-7 (conducting a protocol-level survey for special status plant species)
- BIO-9 (preventing the spread of invasive species)
- AQ-3 (creating a burn plan following the CAL FIRE burn plan template)
- AQ-4 (minimizing dust during treatment activities)
- GEO-1 (suspending all activities during rain events)
- GEO-3 (stabilizing soil disturbance)
- GEO-4 (monitoring for erosion and implementing erosion control)
- GEO-5 (draining stormwater via water breaks)

- GEO-7 (minimizing erosion)
- HAZ-5 (spill prevention and response plan)
- HAZ-6 (comply with herbicide application regulations)
- HYD-4 (identify and protect watercourse and lake protection zones)
- HYD-5 (protect non-target vegetation and special-status species from herbicide)

In addition to the SPRs, the following MMs are applicable: BIO-1a (Avoid Loss of Special-Status Plants Listed under ESA [Endangered Species Act] or CESA [California Endangered Species Act]), BIO-1b (Avoid Loss of Special-Status plants Not Listed Under ESA or CESA), and BIO-1c (Compensate for Unavoidable Loss of Special-Status Plants). Pursuant to MMs BIO-1a through BIO-1c, loss of special-status plant species would be avoided where feasible, and a Compensatory Mitigation Plan would be prepared and implemented to offset unavoidable impacts. A detailed analysis of potential impacts to special-status plant species is included below.

Bensoniella is listed as rare under CESA. Suitable habitat for bensoniella, a perennial herb, occurs within the project area and includes wet meadows and mesic, open sites within lower montane coniferous forest habitat. CAL FIRE FRAP data (CAL FIRE 2024) maps several wet meadows within the project area, and mesic sites and wet meadows were observed during the biological reconnaissance survey. Five CNDDDB occurrences have been documented within 5 miles of the project area; the nearest occurrence (1990) is mapped approximately 2.6 miles east of the project area (CDFW 2026a). Suitable habitat for bensoniella in the project treatment area cannot be avoided throughout the treatment area. Implementation of SPR HYD-4 (Identify and protect watercourse and lake protection zones (WLPZ)) would provide protections for wet meadows and other wet areas by limiting the use of equipment and prohibiting burn piles within WLPZs and wet areas. In addition, pursuant to SPR BIO-7, protocol-level surveys for special-status plants would be conducted in suitable habitat that could be affected by the treatment. If bensoniella is observed during protocol-level surveys, MM BIO-1a requires establishment of a no-disturbance buffer (generally a minimum of 50 feet) unless consultation with CDFW and USFWS determines occupied habitat is reasonably expected to improve with treatment implementation. If buffers cannot be maintained during treatment activities and CDFW/USFWS do not determine occupied habitat is reasonably expected to improve with treatment implementation, Mitigation Measure BIO-1c would be implemented. BIO-1c requires that a Compensatory Mitigation Plan be developed and implemented to determine a compensatory mitigation strategy that includes how unavoidable losses of special-status plants would be compensated.

The remaining species determined to have potential to occur in the project area are not listed under CESA or ESA. Coast fawn lily (a perennial bulbiferous herb), Howell's montia (an annual herb), and Bald Mountain milk-vetch, giant fawn lily, Heckner's Lewisia, and white-flowered rein orchid (all perennial herbs), have high potential to occur due to overlapping CNDDDB occurrences and the presence of suitable habitat within the Project Area.

Of the 40 special-status plant species known to occur within the region, 23 special-status plant species were identified to have moderate potential to occur in the project area. The majority of

these species are geophyte species: Shasta chaenactis, rattlesnake fern, northern clustered sedge, northern meadow sedge, Oregon fireweed, Klamath gentian, California globe mallow, northern microseris, coast checkerbloom, Trinity River jewelflower, bunchberry, American manna grass, Regel's rush, small groundcone, great burnet, water bulrush, Siskiyou checkerbloom, Gasquet rose, and robust false lupine. The remaining species are an annual herb (Pacific gilia), moss (green shield-moss), and fruticose lichen (angel's hair lichen).

California globe mallow, Oregon fireweed, northern clustered sedge, coast checkerbloom, bunchberry, northern meadow sedge, Regel's rush, rattlesnake fern, northern microseris, American manna grass, water bulrush, and Klamath gentian are generally known to occur in wet environments such as wet meadows, streambanks, seeps, ponded areas and other mesic sites. There are a wide variety of wet environments located throughout the project area, as observed during the biological reconnaissance survey and mapped in CAL FIRE FRAP data (CAL FIRE 2024), the National Wetlands Inventory (USFWS 2026c), and the Watershed Assessment, Tracking and Environmental Results System (USEPA 2025). During the biological reconnaissance survey, a wet meadow, ponded areas, perennial, intermittent and ephemeral streams were observed. The region near the project area is generally considered to be moist coastal forest habitat; the average annual precipitation from 1991 to 2020 was 49.94 inches (Willow Creek 4.5 NNE) (NOAA 2020). All of the species listed above have one or more CNDDDB occurrences mapped within 5 miles of the project area except water bulrush and Klamath gentian. Implementation of SPR HYD-4 (Identify and protect watercourse and lake protection zones [WLPZ]) includes protections for waterways, wet meadows and additional wet areas, such as limiting the use of equipment prohibiting burn piles within WLPZs and wet areas and would minimize impacts to these plant species.

Robust false lupine may be found on ridgetops in north coniferous forest in the project area. The nearest CNDDDB occurrence for robust false lupine is located approximately 4 miles west of the project area (CDFW 2026a). Suitable habitat for Siskiyou checkerbloom is found in open areas and roadcuts in conifer forest throughout the project area. The nearest CNDDDB occurrence (2019) for Siskiyou checkerbloom is located approximately 1.9 miles southwest of the project area. Trinity River jewelflower and Pacific gilia may be found along steep slopes in the project area including along the Trinity River, state highways, and other roadways. The most recent CNDDDB occurrence for Trinity River jewelflower is from 2009 and is mapped approximately 1.4 miles south of the project area; the record indicates the species was observed on a steep bluff along CA-299 (CDFW 2026a). Pacific gilia may also be found in grassland in the project area. The nearest CNDDDB occurrence for Pacific gilia is from 2011 and is mapped approximately 0.25 mile west of the project area; the record indicates 150 plants were observed on a south facing cut bank. Angel's hair lichen and green shield-moss are most likely to be found in coniferous forest habitat which is dominant in all portions of the project area. Serpentine soil is present in the western portion of the project area (CDOC 2015) as shown in **Figure 7**. Shasta Chaenactis, Gasquet rose, and great burnet may be found within serpentine areas; great burnet may be found specifically along waterways and seeps within serpentine.

The remaining five special-status plant species were determined to have low potential to occur within the Project Area: Siskiyou phacelia (annual herb), Mad River fleabane daisy, seacoast ragwort

and Wolf's evening-primrose (all geophyte species). Most of the project area is located outside the known elevation ranges of Siskiyou phacelia and Mad River fleabane daisy. Although these species may occur in higher elevation ranges within the project area, the likelihood of occurrence is considered low. Furthermore, there are no CNDDDB occurrences of either species within 5 miles of the project area. Seacoast ragwort is generally known to occur along the coast, west of the project area (Trock 2012). Similarly, Wolf's evening-primrose is primarily known from locations west of the project area. Although a historic CNDDDB occurrence is mapped within the project area, the record indicates that additional investigation is warranted because the location is farther inland than the species' known range (CDFW 2026a). In addition, the record states the occurrence may be erroneous (CDFW 2026a).

Pursuant to SPR BIO-7, protocol-level surveys are not required for non-listed geophyte and annual plant species if treatment activities are conducted during the species' dormant season or after annual species have completed their life cycle, provided that treatment would not alter habitat or destroy seeds, stumps, roots, rhizomes, bulbs or other underground parts in a manner that would make it unsuitable for the target species to reestablish following treatment. Because treatment activities may occur during the non-dormant period (growth period) for these species, protocol-level surveys would be required, in accordance with SPR BIO-7, for all special-status plant species with potential to occur in the Project Area. If any of these species are observed during protocol-level surveys, Mitigation Measure BIO-1b requires establishment of a no-disturbance buffer, generally a minimum of 50 feet, unless treatments can be conducted during the dormant season for these species. If buffers cannot be maintained during treatment activities, or if treatment activities cannot be limited to the dormant season, Mitigation Measure BIO-1c requires preparation of a Compensatory Mitigation Plan. The plan would identify an appropriate compensatory mitigation strategy and describe how unavoidable impacts to special-status plant species would be compensated.

With the implementation of SPRs and MMs listed above, the Project would not substantially affect special-status plant species directly or through habitat modifications. Consistent with the PEIR, impacts would be less than significant with mitigation.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status plant species to occur within the project area is essentially the same within and outside the treatable landscape; therefore, the potential impact related to special-status plant species is also the same as described above.

In addition, HCRCD proposes to revise SPR GEO-1 to suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. This revision is consistent with the original purpose of SPR GEO-1 and the project proponent would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance. HCRCD also proposes to revise SPR AQ-3 to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent. The

CAL FIRE Prescribed Fire Guidebook provides the template and required elements of CAL FIRE burn plans: a description of the burn area; target weather conditions; hazards that may be encountered; personnel needs, safety, and contacts to make prior to burning; and short and long-term management goals. The burn plan templates proposed to be used by HCRCD contain all of these elements. In addition to these elements, HCRCD proposes to include elements in the burn plan that are required to obtain burn permits and any additional elements that are needed to design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures. HCRCD also proposes to revise SPR AQ-4 to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the PEIR. This revision is consistent with the purpose of SPR AQ-4 to avoid the creation of dust through treatment vehicles tracking out dust, silt, or mud. For these reasons, proposed revisions to SPR GEO-1, AQ-3, and AQ-4 would not result in a substantially more severe significant effect to special-status plants than what was covered in the PEIR.

Impact BIO-2

Treatment activities that have potential to alter the project area may result in direct or indirect adverse effects to special-status wildlife species. The potential for adverse effects to special-status wildlife species is within the scope of the activities and impacts addressed in the PEIR because the proposed treatment activities and associated levels of disturbance are consistent with those analyzed in the PEIR.

The PEIR analyzed impacts to wildlife by grouping species according to life history characteristics, including tree- and cavity-nesting wildlife, shrub-nesting wildlife, ground-nesting wildlife, burrowing or denning wildlife, insects and other terrestrial invertebrates, bats, ungulates, fish and aquatic invertebrates, and amphibians and reptiles. While treatment activities may indirectly or directly impact special-status wildlife species, implementation of the activities would result in an overall healthier habitat and ecosystem.

The following SPRs would be implemented to minimize impacts to special-status wildlife species:

- BIO-1 (conducting a data review and reconnaissance-level survey)
- BIO-2 (environmental resource training for all personnel)
- BIO-3 (protocol-level survey for sensitive natural communities and sensitive habitats)
- BIO-4 (riparian habitat treatments designed to avoid loss and/or degradation of riparian habitat)
- BIO-6 (prevent spread of plant pathogens)
- BIO-9 (preventing the spread of invasive species)
- BIO-10 (conduct focused or protocol-level surveys for special-status wildlife species or nursery sites)

- BIO-11 (installation of wildlife-friendly fencing around herbicide treatment areas)
- BIO-12 (protect common nesting birds, including raptors)
- GEO-1 (suspending all activities during rain events)
- GEO-3 (stabilizing soil disturbance)
- GEO-4 (monitoring for erosion and implementing erosion control)
- GEO-5 (draining stormwater via water breaks)
- GEO-7 (minimizing erosion)
- HAZ-5 (prepare a Spill Prevention and Response Plan prior to herbicide treatment)
- HAZ-6 (coordinate pesticide use with applicable County Agricultural Commissioners)
- HYD-1 (comply with water quality regulations)
- HYD-3 (water quality protections for prescribed herbivory)
- HYD-4 (establish Watercourse and Lake Protection Zones)
- HYD-5 (protect vegetation and special-status species from herbicides)

Literature and database reviews resulted in a list of 25 special-status wildlife species known from the region. Based on habitat conditions within the treatment areas and reconnaissance-level survey results, one of the 25 special-status wildlife species, foothill yellow-legged frog – north coast DPS, was observed during the biological reconnaissance survey and is known to be present and eleven of the 25 special-status wildlife species have high potential to occur within the project area. Species with high potential to occur include northwestern pond turtle, Sonoma tree vole, Pacific tailed frog, American goshawk, bald eagle, steelhead - northern California DPS winter-run, chinook salmon - upper Klamath and Trinity Rivers ESU, fisher, northern red-legged frog, southern torrent salamander and northern spotted owl.

Seven of the 25 special-status wildlife species were determined to have moderate to high potential to occur within the project area: western bumble bee, Suckley's Cuckoo bumble bee, marbled murrelet, monarch butterfly, Trinity bristle snail, coast cutthroat trout and steelhead (Northern California DPS summer-run). Two species were determined to have low potential to occur within the project area: Townsend's big-eared bat and North American wolverine. In addition to the SPRs listed above, the following mitigation measures would be implemented to further reduce impacts to special-status wildlife species:

- BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

- BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- BIO-4: Avoid State and Federally Protected Wetlands
- BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

Pursuant to Mitigation Measures BIO-2a through BIO-2g, loss of special-status wildlife species and their habitat would be avoided to the extent feasible. If impacts cannot be avoided, a Compensatory Mitigation Plan would be developed and implemented. Pursuant to MM BIO-3a, treatment activities would be designed to avoid impacts on sensitive natural communities, including riparian habitats. If impacts on sensitive natural communities cannot be avoided, MMs BIO-3b and 3c require development and implementation of a Compensatory Mitigation Plan. With implementation of the SPRs and MMs listed above, impacts are expected to be less than significant. A detailed analysis of potential impacts to special-status wildlife species is discussed below.

Insects

Potential breeding and migrating habitat for the monarch butterfly, a federally proposed threatened species, is present in the project area; however, suitable overwintering habitat is absent. Winter roosts sites for the Western population of monarch butterfly extend along the Pacific Coast from northern Mendocino County, California to Baja California, Mexico (NatureServe, Xerces Society 2015). Therefore, no impacts to monarch overwintering sites would occur. Monarch butterflies may migrate through the project area, and adults may use available nectar sources for foraging and mating. If milkweed (*Asclepias* spp.) plants are present in the project area, adults may lay eggs on the plants, and any emerging larvae may feed on the milkweed prior to metamorphosis. Monarch butterflies are dependent on milkweed for reproduction because females lay eggs exclusively on these host plants, which serve as the sole food source for developing caterpillars.

Western bumble bee, a California state candidate endangered species, and Suckley's Cuckoo bumble bee, a federally proposed endangered species, may also occur within the project area. Three CNDDDB occurrences for western bumble bee, documented in 1968, 1969 and 2013, are mapped 5 five miles of the project area (CDFW 2026a). The most recent occurrence, recorded in 2013, is located approximately 4.5 miles south of the project area, on the west side of Six Rivers National Forest (CDFW 2026a). Western bumble bee is known to nest in a variety of habitats although their overwintering sites remain poorly understood (Xerces Society 2023).

Although no CNDDDB occurrences of Suckley's Cuckoo bumble bee have been documented near the project area, this species is known to occur in the Klamath Mountains region of California, where most of the project area is located. Suckley's Cuckoo bumble bees are known to take over western bumble bee colonies (USFWS 2024).

Treatment activities could result in impacts to individual monarch butterflies and to western bumble bee and Suckley's Cuckoo bumble bee colonies, if present. However, implementation of the SPRs and MMs listed above, particularly SPR BIO-2 (environmental resource training for all personnel), SPR BIO-10 (conduct focused or protocol-level surveys for special-status wildlife species or nursery sites), SPR HAZ-6 (coordinate pesticide use with applicable County Agricultural Commissioners), and SPR HYD-5 (protect vegetation and special-status species from herbicides), would reduce impacts to less-than-significant levels.

Amphibians

Pacific tailed-frog, northern red-legged frog, foothill yellow-legged frog (North Coast DPS) and southern torrent salamander are California Species of Special Concern known to be present in the project area. The Trinity and South Fork Trinity Rivers provide suitable breeding habitat for foothill yellow-legged frog and northern red-legged frog. In addition, perennial tributaries and other montane perennial streams in the project area provide breeding habitat for foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander. Dispersal and overwintering habitat is also present in the numerous intermittent and ephemeral streams in the project area. Wet meadows and ponded areas may provide additional habitat for northern red-legged frog.

Four CNDDDB occurrences of Pacific tailed frog, documented from 1984, 1985 and 2006, overlap in the project area. The most recent occurrence, recorded in 2006, is mapped to the general vicinity of Willow Creek; the record indicates that one individual was photographed in the area (CDFW 2026a). One CNDDDB occurrence for northern red-legged frog, documented in 2016, overlaps the project area on the east side of the Trinity River; the record indicates that one adult was observed (CDFW 2026a). More than ten CNDDDB occurrences of foothill yellow-legged frog overlap the project area and are mapped in the Trinity River, South Fork Trinity River, Ammon Creek, Madden Creek, and Fourmile Creek (CDFW 2026a). More than 10 CNDDDB occurrences of southern torrent salamander also overlap the project area and are associated with Boise Creek, Cedar Creek, the Coon Creek drainage, and a roadside seep (CDFW 2026a).

SPR BIO-10 requires that if suitable habitat is identified in the project area for special-status wildlife species, a focused or protocol-level survey would be conducted unless species presence is assumed. Treatment activities are not proposed within state- or federally protected wetlands or other aquatic habitats, including streams. Watercourses, wet meadows, and other wet areas would be protected through implementation of SPR HYD-4. In addition, a 50-foot buffer along all waterways would be maintained for most treatment activities, although manual riparian thinning may occur within the buffer.

Therefore, pursuant to Mitigation Measure BIO-2a, if treatment activities must occur within occupied habitat and there is potential for this species to be present year-round, consultation with CDFW and/or USFWS would be required to determine whether treatment can be scheduled during a period that avoids mortality, injury, or disturbance. Pursuant to MM BIO-2b, habitat function must be maintained. If maintaining habitat function is determined to be infeasible, MM BIO-2c would be

implemented, requiring preparation and implementation of a Compensatory Mitigation Plan. MM BIO-4 would further reduce potential impacts by requiring protection of state and federally protected wetlands including seasonal wetlands which may provide habitat for amphibian species.

Reptiles

Northwestern pond turtle, federally proposed as threatened and a California Species of Special Concern, may occur in the project area. A 2006 CNDDDB occurrence documents between one and 20 adults and juveniles observed at 31 sites along the South Fork Trinity River between 2005 and 2006 (CDFW 2026a). Additional CNDDDB occurrences in the vicinity of the project area are associated with Big Lake and several unnamed ponds located within approximately 2 miles of the South Fork Trinity River (CDFW 2026a).

The Trinity River, located north of the South Fork Trinity River, and tributaries with open canopy and suitable basking habitat, such as Horse Linto Creek, may provide additional suitable habitat for this species. Northwestern pond turtles are more commonly known to nest within 330 feet of suitable aquatic habitat, although they have been recorded traveling up to 0.25 mile from aquatic habitat to nesting sites (USFWS 2023). Suitable nesting habitat, including open and sunny areas such as annual grasslands, is present within the project area near suitable aquatic habitat. In addition, northwestern pond turtles may travel up to 0.31 mile from aquatic habitat to overwinter in shrubby or forested areas where a deep layer of duff or leaf litter is present (Western Pond Turtle Range-wide Conservation Coalition 2020).

Pursuant to SPR BIO-10, focused or protocol-level surveys may be conducted where suitable habitat is present; however, surveys are not required if species presence is assumed. MM BIO-2b requires implementation of additional protective measures, such as no-disturbance buffers and seasonal work restrictions, to avoid mortality, injury, or disturbance and to maintain habitat function for other special-status wildlife species that are not listed under CESA or ESA or are California Fully Protected. If the requirements of MM BIO-2b cannot be implemented, MM BIO-2c would require preparation and implementation of a Compensatory Mitigation Plan.

Fish

Chinook salmon (Upper Klamath and Trinity Rivers ESU), a Federal candidate for listing and a state-listed threatened species, and steelhead (Northern California DPS winter-run), federally listed as threatened, has high potential to occur within the project area. Chinook salmon is known to occur in the Trinity River based on recent occurrences. Winter-run steelhead is known to occur in Redwood Creek and its tributaries, including Minor Creek, which overlaps the northwestern portion of the project area based on recent occurrences.

Treatment activities are not proposed within state- or federally protected wetlands, or other aquatic habitats, including streams. In accordance with SPR HYD-4, protection zones would be established around watercourses based on stream use and presence of aquatic resources. These protection zones would prohibit the use of heavy equipment, burn piles, fire ignition activities, and servicing of equipment within the protected area. Although manual riparian trimming may occur within the

protection zones, this treatment activity is not anticipated to impact aquatic habitat. Steelhead (Northern California DPS summer-run), a federally-listed threatened, and state listed as endangered species, and coast cutthroat trout, a California Species of Special Concern, may also occur within the project area. CNDDDB records document occurrences of both species in Redwood Creek and its tributaries approximately 1-2 miles west of the project area. These species may also occur in Minor Creek within the northwestern portion of the project area.

As described above, treatment activities would not occur in state- or federally protected wetlands, or other aquatic habitats, including streams. Protection zones established pursuant to SPR HYD-4 would prohibit heavy equipment use, burn piles, fire ignition activities, and equipment servicing near watercourses. While manual riparian trimming may occur within protection zones, this activity is not anticipated to impact aquatic habitat.

Mollusks

The Trinity bristle snail, a state-listed threatened species, may occur within the project area in a limited capacity. Surveys conducted between 1999 to 2002 expanded the known range of the species. Once thought to be restricted to a few streams within the Trinity River drainage, the species is now known to occur from the Trinity-Humboldt County line and South Fork Mountain south to Norse Butte and east to Forest Glen (CDFW 2005). Trinity bristle snail occurs in riparian corridors and upland areas within Klamath mixed conifer forest habitat and is generally found in moist environments (CDFW 2005).

In accordance with SPR HYD-4, protection zones would be established for watercourses based on stream use and the presence of aquatic resources. The protection zones would prohibit the use of heavy equipment, burn piles, fire ignition activities, and servicing of equipment within the protected area. Although manual riparian trimming may occur within the protection zones, this treatment activity is not anticipated to impact aquatic habitat.

In accordance with SPR BIO-10, Trinity bristle snail presence would either be assumed or determined through protocol-level surveys prior to project implementation. Mitigation Measure BIO-2b would be implemented to avoid mortality, injury, disturbance, and to maintain habitat function. If Mitigation Measure BIO-2b is determined to be insufficient to protect this species, a Compensatory Mitigation Plan would be developed and implemented pursuant to MM BIO-2c. Therefore, impacts to Trinity bristle snail would be less than significant with mitigation.

Birds

Northern spotted owl, a federally listed threatened species, and bald eagle, a state-listed endangered species has a high potential to occur within the project area. The CDFW Spotted Owl Observations Database contains 3,944 northern spotted owl positive and activity center observations within 5 miles of the project area (CDFW 2026b). Of these observations, 637 are recorded nest locations. Many of these records overlap the project area. In addition, designated USFWS critical habitat for northern spotted owl is directly adjacent to the project area. Suitable

foraging, roosting, and breeding habitat is present throughout the project area within the dominant hardwood and conifer forest communities.

Although only one CNDDDB occurrence of bald eagle is mapped within approximately 0.35 mile south of the project area (1997 record), numerous additional observations, including nesting records, have been documented along the Trinity River and South Fork Trinity River (iNaturalist 2026 and CDFW 2019). Bald eagles are known to nest within 1 mile of fish-bearing waters. The Trinity River and South Fork Trinity River provide suitable foraging habitat, and nesting territories may occur within one mile of these waterways. Although fish-bearing streams occur within the project area, bald eagles prefer open water to forage and typically choose nest sites with unobstructed views of nearby foraging areas (USFWS 2007). Given the denser tree canopy cover associated with smaller tributaries and upland streams, bald eagle nesting activity is expected to be concentrated within 1 mile of the Trinity River and South Fork Trinity River; however, nests could also occur in other areas of the project area within 1 mile of fish-bearing waters.

American goshawk, a California Species of Special Concern, is known to occur in the project area. Two historic CNDDDB occurrences from 1979 and 1983 overlap the project area. The 1979 record indicates that the nest is no longer active, while the 1983 record identifies a nest in an area that has not been subsequently surveyed (CDFW 2026a). Dense conifer forest canopy located throughout the project area provides suitable foraging, roosting, and breeding habitat for this species.

Marbled murrelet, a federally listed threatened species, may occur within the project area. Although no CNDDDB occurrences have been recorded within 5 miles of the project area (CDFW 2026a), western portions of the project area are directly adjacent to designated USFWS final critical habitat for marbled murrelet. The known nesting range for marbled murrelet in California extends approximately 25 miles inland from the coast (USFWS 2026); therefore, portions of the project area west of the town of Willow Creek fall within the species' nesting range. Based on field observations, potentially suitable nesting habitat is present for this species.

In accordance with SPR BIO-10, either species presence will be assumed, or protocol-level surveys will be conducted, as applicable, for northern spotted owl, bald eagle, marbled murrelet, and American goshawk in accordance with established survey protocols, including:

- *USFWS 2012 Protocol for Surveying Proposed Management Activities that may Impact Northern Spotted Owl* (USFWS 2012);
- *Northern Goshawk Inventory and Monitoring Technical Guide* (USFS 2006);
- *Methods for Surveying Marbled Murrelets in Forests: A Revised Protocol of Land Management and Research* (Pacific Seabird Group 2003);
- *National Bald Eagle Management Guidelines* (USFWS 2007)

Pursuant to Mitigation Measure BIO-2a, habitat function for all special-status bird species must be maintained, and mortality, injury or disturbance must be avoided. Because treatment activities may occur within occupied habitat, MM BIO-2a requires implementation of limited operating periods where appropriate. In addition, SPR BIO-10 requires identification of habitat features necessary for

species survival that should be flagged for avoidance, as well as retention of canopy cover that is specific to the species. If impacts to habitat function or mortality/injury/disturbance is unavoidable, a Compensatory Mitigation Plan will be developed and implemented pursuant to Mitigation Measure BIO-2c.

Mammals

Sonoma tree vole and fisher, both California Species of Special Concern, are known to occur in the project area. Sonoma tree vole spends their entire lifecycle in the tree canopy and feeds almost exclusively on Douglas fir needles. Discarded resin ducts from these needles are used to create their nests. Douglas fir trees were observed throughout the project area during the biological reconnaissance survey, indicating the presence of suitable habitat. There are 59 CNDDDB occurrences of fisher documented within 5 miles of the project area, with numerous occurrences overlapping the project area. Fisher occupy large areas of dense, mature forest with high percentage of canopy closure, which is present in the project area.

North American wolverine, a federally listed threatened species, and Townsend's big-eared bat, a California Species of Special Concern, have low potential to occur in the project area. In the last 100 years, only two North American wolverine sightings have been documented in California; the most recent observation occurred in 2023 in the eastern Sierra Nevada Mountains within Inyo and Yosemite National Parks (CDFW 2023). Although this species is capable of traveling long distances and suitable habitat is present in the project area, the limited number of documented occurrences suggests that its presence is unlikely.

One CNDDDB occurrence of Townsend's big-eared bat, recorded in 1951, is mapped within 5 miles of the project area. Townsend's big-eared bat is known to roost in open structures such as abandoned buildings, caves, and mines (National Park Service 2020). Although such features may be present in the project area, treatment activities are not expected to disturb suitable roosting habitat for this species.

In accordance with SPR BIO-10, focused surveys would be conducted for North American wolverine, Sonoma tree vole and fisher and roosting habitat for Townsend's big-eared bat. If either Sonoma tree vole or fisher are determined to be present, Mitigation Measure BIO-2b would be implemented to avoid mortality, injury or disturbance and maintain habitat function for these species. If Mitigation Measure BIO-2b is determined to be insufficient to protect these species, a Compensatory Mitigation Plan would be created and implemented pursuant to MM BIO-2c.

Inclusion of land in the project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status wildlife species to occur within the project area is essentially the same within and outside of the treatable landscape; therefore, the potential impact related to special-status wildlife species is also the same, as described above.

Impact BIO-3

Initial and maintenance treatments, including mechanical treatments and potential herbicide application, could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities. The potential for treatment activities to result in adverse effects to sensitive habitats was evaluated in the PEIR. Because the proposed treatment activities and associated level of disturbance are consistent with those analyzed in the PEIR, the potential impacts to sensitive habitats are within the scope of impacts previously evaluated. Applicable SPRs include BIO-1, BIO-2, BIO-3, BIO-4, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, and GEO-7, HAZ-5, HAZ-6 and HYD-4.

Habitats within the project area were identified using CAL FIRE FRAP data (CAL FIRE 2024), which classifies habitats according to the CWHR system. Using the CWHR classifications, natural communities occurring within the project area were identified to alliance level based on the online version of the *Manual of California Vegetation* (Sawyer et al. 2009; vegetation.cnps.org). **Table 3** identifies potential sensitive natural communities with potential to occur within the project area based on the CWHR classifications, USDA Ecological Section Map, and the project area’s elevation range.

The western portion of the project area is located in the Northern California Coast Ranges, while the remaining areas are located in the Klamath Mountains. During the biological reconnaissance survey, several sensitive natural communities were observed, including California bay forest and woodland; bigleaf maple forest and woodland; Ponderosa pine–incense cedar–Douglas fir forest and woodland; Douglas fir–incense cedar forest and woodland; and Hoary, common, and Stanford manzanita chaparral. However, not all portions of the project area were surveyed, and survey intensity was insufficient to identify vegetation to the alliance level throughout the project area. Therefore, Table 3 may not include all sensitive natural communities present. Alliances under the Manual of California Vegetation system with a California Rarity Rank of S1-S3 are considered sensitive natural communities by CDFW.

Additional CWHR classifications present in the project area that are not considered natural communities, or for which no sensitive natural communities are expected to occur, include barren land, cropland, deciduous orchard, irrigated hayfield, irrigated row and field crops, pasture, rice, and urban land. Lacustrine and riverine habitats were also identified in the project area.

Table 3 Sensitive Natural Communities Documented, or with Potential to Occur in the Project Area

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Closed-cone pine-cypress	<i>Hesperocyparis (sargentii, macnabiana)</i>	Ultramafic cypress woodland	S3
Coastal Oak Woodland	<i>Umbellularia californica</i>	California bay forest and woodland	S3
Douglas Fir; Montane Hardwood - Conifer	<i>Acer macrophyllum</i>	Bigleaf maple forest and woodland	S3

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Douglas Fir	<i>Chamaecyparis lawsoniana</i>	Port Orford cedar forest and woodland	S3
Douglas Fir; Ponderosa Pine	<i>Pinus ponderosa</i> - <i>Calocedrus decurrens</i> - <i>Pseudotsuga menziesii</i>	Ponderosa pine - Incense Cedar - Douglas fir forest and woodland	Sensitive¹
Douglas Fir	<i>Pseudotsuga menziesii</i> - <i>Calocedrus decurrens</i>	Douglas fir - incense cedar forest and woodland	S3
Douglas Fir	<i>Tsuga heterophylla</i>	Western hemlock forest	S2
Jeffrey Pine	<i>Pinus jeffreyi</i>	Jeffrey pine forest and woodland	
Klamath Mixed Conifer	<i>Picea breweriana</i>	Brewer spruce forest and woodland	S2
Mixed chaparral	<i>Arctostaphylos (canescens, manzanita, stanfordiana)</i>	Hoary, common, and Stanford manzanita chaparral	S3
Mixed chaparral	<i>Arctostaphylos glandulosa</i>	Eastwood manzanita chaparral	Sensitive¹
Mixed chaparral	<i>Ceanothus (oliganthus, tomentosus)</i>	Hairy leaf - woolly leaf ceanothus chaparral	S3
Mixed chaparral	<i>Notholithocarpus densiflorus</i> var. <i>echinoides</i>	Shrub tanoak chaparral	S3
Mixed chaparral	<i>Quercus durata</i>	Leather oak chaparral	S3
Montane Chaparral	<i>Chrysolepis sempervirens</i>	Bush chinquapin chaparral	S3
Montane Chaparral	<i>Quercus sadleriana</i>	Sadler oak or deer oak brush fields	S3
Montane Chaparral	<i>Quercus vacciniifolia</i>	Huckleberry oak chaparral	
Montane Hardwood	<i>Aesculus californica</i>	California buckeye groves	S3
Montane Hardwood	<i>Notholithocarpus densiflorus</i>	Tanoak forest	S3
Montane Hardwood	<i>Quercus garryana</i> (tree)	Oregon white oak woodland and forest	S3
Montane Hardwood	<i>Umbellularia californica</i>	California bay forest and woodland	S3
Montane Riparian	<i>Alnus incana</i>	Mountain alder thicket	S3
Montane Riparian	<i>Fraxinus latifolia</i>	Oregon ash groves	S3
Montane Riparian; Valley Foothill Riparian	<i>Populus fremontii</i> - <i>Fraxinus velutina</i> - <i>Salix gooddingii</i>	Fremont cottonwood forest and woodland	S3
Montane Riparian	<i>Populus trichocarpa</i>	Black cottonwood forest and woodland	S3
Montane Riparian	<i>Salix jepsonii</i>	Jepson willow thickets	S3
Montane Riparian	<i>Alnus rhombifolia</i>	White alder groves	Sensitive¹
Montane Riparian	<i>Carex nudata</i>	Torrent sedge patches	S3
Montane Riparian; Valley Foothill Riparian	<i>Vitis arizonica</i> - <i>Vitis girdiana</i>	Wild grape shrubland	S3
Perennial Grassland	<i>Alopecurus geniculatus</i>	Water foxtail meadows	S3?²
Perennial Grassland	<i>Bromus carinatus</i> - <i>Elymus glaucus</i>	California brome - blue wildrye prairie	S3
Perennial Grassland	<i>Carex utriculata</i> - <i>Calamagrostis canadensis</i>	Northwest Territory sedge - Bluejoint Graminoid Wet Meadow & Marsh	S3
Perennial Grassland	<i>Festuca idahoensis</i> - <i>Pseudoroegneria spicata</i> - <i>Poa secunda</i>	Idaho fescue - bluebunch wheat grass - pine bluegrass grassland	S3
Perennial Grassland; Valley Foothill Riparian	<i>Heterotheca (oregona, sessiliflora)</i>	Goldenaster patches	S3

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Valley Foothill Riparian	<i>Acer negundo</i>	Box-elder forest and woodland	S3
Valley Foothill Riparian	<i>Carex nudata</i>	Torrent sedge patches	S3
Valley Foothill Riparian	<i>Frangula californica</i> - <i>Rhododendron occidentale</i> - <i>Salix breweri</i>	California coffeeberry - western azalea scrub - Brewer's willow	S3
Valley Foothill Riparian	<i>Populus trichocarpa</i>	Black cottonwood forest and woodland	S3
Valley Foothill Riparian	<i>Salix gooddingii</i> - <i>Salix laevigata</i>	Goodding's willow - red willow riparian woodland and forest	S3
Wet Meadow	<i>Bromus carinatus</i> - <i>Elymus glaucus</i>	California brome - blue wildrye prairie	S3
Wet Meadow	<i>Carex utriculata</i> - <i>Calamagrostis canadensis</i>	Northwest Territory sedge - Bluejoint Graminoid Wet Meadow & Marsh	S3
Wet Meadow	<i>Darlingtonia californica</i>	California pitcher plant fens	S3
Wet Meadow	<i>Senecio triangularis</i> - <i>Veratrum californicum</i> - <i>Mimulus spp.</i>	Arrowleaf ragwort - white corn lily - monkeyflower mesic meadow	S3S4
Wet Meadow	<i>Triantha occidentalis</i> - <i>Narthecium californicum</i>	Western false asphodel - California bog asphodel fens	S2? ²

¹ The alliance association is considered a sensitive natural community although there is no state rarity rank assigned (CDFW 2025).

² The “?” indicates the best estimate of the rank when there are insufficient samples over the full expected range of the type, but existing information points to this rank.

Pursuant to SPR BIO-3, a protocol-level survey would be conducted to identify, map and digitally record the extent of the sensitive natural community. Mitigation Measure BIO-3a requires treatment activities to be designed to avoid the loss of sensitive natural communities, including limiting removal of native vegetation within fuel breaks and designing treatments to restore the natural fire regimes and vegetation composition and structure, thereby maintaining or improving habitat function. If significant impacts to sensitive natural communities cannot be avoided, Mitigation Measure BIO-3b would be implemented to compensate for unavoidable losses through development and implementation of a Compensatory Mitigation Plan.

Pursuant to SPR BIO-4, treatments in riparian habitats would be designed to retain or improve habitat functions by retaining at least 75 percent of the overstory vegetation and 50 percent of the understory vegetation, while limiting treatment activities to the removal of uncharacteristic fuel loads. If significant impacts to riparian vegetation remain following the implementation of SPR BIO-4, Mitigation Measure BIO-3c would be implemented to compensate for unavoidable loss of riparian habitat. A Compensatory Mitigation Plan would be developed and implemented to identify the residual significant impacts and describe the compensatory mitigation measures required to reduce those impacts.

In addition, based on the mature diameter-at-breast-height (DBH) ranges of tree species observed during the site visit or known to occur within riparian forest habitat in the area, limiting tree removal

to a maximum of 12 inches DBH for hardwood species and 14 inches DBH for conifers would avoid removal of large-diameter trees. Large-diameter trees are generally defined as those greater than 20 inches DBH (Chisholm and Gray 2025). **Table 4** summarizes the typical mature DBH ranges for riparian tree species that may occur within the project area.

Table 4 Riparian Hardwood Tree Species and Mature DBH Ranges

Common Name	Scientific Name	Mature Tree dbh
Bigleaf Maple	<i>Acer macrophyllum</i>	12" to 36"
Box-elder	<i>Acer negundo</i>	24" to 48"
California laurel	<i>Umbellularia californica</i>	18" to 30"
Red alder	<i>Alnus rubra</i>	10" to 34"
White alder	<i>Alnus rhombifolia</i>	11" to 21"
Oregon ash	<i>Fraxinus latifolia</i>	16" to 30"
Velvet ash	<i>Fraxinus velutina</i>	8" to 12"
Fremont cottonwood	<i>Populus fremontii</i>	11.8" to 59"
Black cottonwood	<i>Populus trichocarpa</i>	48" to 60"
Goodding's willow	<i>Salix gooddingii</i>	30"
Red willow	<i>Salix laevigata</i>	12" to 24"

Sources: Oregon State University 2026; U.S. Department of Agriculture

With the implementation of the applicable SPRs and MMs described above, the Project would not substantially affect riparian habitat or other sensitive natural communities through direct loss or degradation. Impacts would be consistent with those analyzed in the PEIR and would be less than significant.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-4

Initial and maintenance treatment activities may result in indirect or direct impacts to designated wetlands. While an aquatic resources delineation was not completed in the project area, wetlands are mapped within the project area by the NWI (USFWS 2026c). Additional aquatic resources were also observed during the biological reconnaissance survey including seeps, small ponds and mesic areas. However, additional wetlands may be present in the project area that were not identified or mapped in the NWI including seasonal wetlands, springs, seeps, small ponds, and other aquatic resources. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR. Based on review of project-specific biological

resources, the project area contains numerous perennial (Class I) and intermittent (Class II), and ephemeral (Class III) streams, ponds, freshwater emergent wetlands, and forested/shrub wetland features. This impact on wetlands is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impacts to wetlands in the same as stated above.

Implementation of SPR HYD-4 and SPR BIO-4 would avoid and minimize adverse impacts in watercourse and lake protection zones (WLPZs) including preventing ignition within WLPZs and excluding prescribed burns from riparian areas.

The PEIR found that treatment activities could inadvertently destroy or adversely modify protected wetlands resulting in significant impacts. Wetland buffers required under Mitigation Measure BIO-4 are intended to prevent direct and indirect impacts on wetlands including fill, disruption of hydrology, adverse effects on water quality, and removal of wetland vegetation. Therefore, implementation of MM BIO-4 would reduce impacts to less than significant with mitigation.

Impact BIO-5

Treatment activities, including mechanical treatments, could result in direct or indirect adverse impacts on wildlife movement corridors or nurseries. The potential for treatment activities to result in adverse effects to wildlife movement corridors and nurseries was evaluated in the PEIR. Because the proposed treatment activities and associated disturbance are consistent with those analyzed in the PEIR, potential impacts to wildlife movement corridors and nurseries are within the scope of impacts previously evaluated. Applicable SPRs include BIO-1, BIO-4, BIO-10, BIO-11 and HYD-4.

The project area consists of private lands and State Responsibility Areas (SRAs). The Project is located in a rural area with limited infrastructure and population, providing extensive habitat connectivity with limited anthropogenic barriers. The project area contains large expanses of forest habitat and numerous waterways, including the Trinity River, South Fork Trinity River, associated tributaries, Redwood Creek, and other perennial streams that facilitate wildlife movement throughout the region. In addition, MM BIO-5 would be implemented, as applicable, to identify nursery habitats and establish avoidance buffers around sensitive areas.

With the implementation of the applicable SPRs and the MM described above, the Project would not substantially interfere with wildlife movement corridors or impede the use of nursery habitat. Impacts to wildlife movement corridors and nurseries are consistent with those analyzed in the PEIR and would be less than significant with mitigation.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the

same as those within the treatable landscape, as described above, the potential impact on wildlife movement corridors is also the same.

Impact BIO-6

Treatment activities including mechanical treatments and herbicide application, if used, may result in direct or indirect adverse impacts on common wildlife species through habitat modification or temporary reductions in habitat availability, including impacts to nesting birds. The potential for treatment activities to result in adverse effects to habitat and abundance of wildlife was evaluated in the PEIR. Because the proposed treatment activities and associated disturbance are consistent with those analyzed in the PEIR, potential impacts to common wildlife species, including nesting birds, are within the scope of impacts previously evaluated. Applicable SPRs include BIO-1, BIO-2, BIO-3, BIO-4, BIO-12, and HYD-4.

With implementation of the applicable SPRs described above, the Project would not substantially reduce habitat or abundance of common wildlife species. Impacts to habitat or abundance of common wildlife are consistent with those analyzed in the PEIR and would be less than significant. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, as described above, the potential impact on common wildlife, including nesting birds is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-7

The potential for treatment activities to result in conflict with local policies or ordinances was evaluated in the PEIR. Pursuant to SPR AD-3 (consistency with local plans, policies, and ordinances), the project proponent must design and implement the treatment activities in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances.

The project area is located within the jurisdictions of Humboldt and Trinity Counties. Relevant policies contained in the Humboldt County General Plan and Trinity County General Plan would be adhered to pursuant to SPR AD-3. Because treatment activities would be conducted in a manner consistent with applicable local plans and policies, the Project would not conflict with local policies or ordinances. Therefore, no impact would occur.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. This determination is

consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-8

The project area is not located within any Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Therefore, the Project would not conflict with any HCPs or NCCPs, and no impact would occur.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with an adopted HCP or NCCP is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Biological Resource Impacts

Treatment activities are consistent with the treatment types and activities analyzed in the CalVTP PEIR. Biological resources occurring within portions of the project area located outside the CalVTP treatable landscape are substantially similar to those occurring within the treatable landscape. Project-specific components were evaluated and compared with the environmental and regulatory conditions analyzed in the CalVTP PEIR (CalVTP Final PEIR, Volume II, Section 3.6.1 and 3.6.2), including areas outside the treatable landscape. Based on this evaluation, the Project was determined to be consistent with the assumptions and impact analyses presented in the PEIR. Therefore, no new significant impacts to biological resources would occur beyond those already addressed in the PEIR.

3.6 Energy Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1, pp. 3.9-7 – 3.9-8	Yes	NA	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact ENG-1

The use of vehicles and mechanical equipment during initial treatment and treatment maintenance activities would result in the consumption of energy in the form of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR and found to be less than significant. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. Diesel and petroleum-based fuels, such as gasoline, would be consumed from the use of heavy-duty equipment and trucks, mechanical equipment, and the transport of personnel and equipment to and from and within the project site. The Project would support fire prevention and suppression. Wildfire response requires an immediate response from emergency personnel and mobilization of equipment from across the state and even across the nation, which may result in inefficient consumption of energy. Implementation of treatment activities would reduce wildfire risk and the intensity of fire responses.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape includes 5,170.53 acres of the 37,739.26-acre project area and constitutes a change to the

geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions are effectively the same within and outside the treatable landscape, and the types of treatment activities and associated use of energy are of the same scale and scope as analyzed in the PEIR; therefore, the energy impact is also the same. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Energy Resource Impacts

The project proponent has considered the site-specific characteristics of the Project both inside and outside the treatable landscape and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (Sections 3.9.1, “Regulatory Setting,” and 3.9.2, “Environmental Setting,” in Volume II of the Final PEIR). Although 5,170.53 acres, or 13 percent of the total 37,739.26-acre project area, lie outside the designated treatable landscape, the Project would not represent an increase in the overall annual treatment target of 250,000 acres that was analyzed under the PEIR. As such, the scope and intensity of the Project remain within the scope of the prior PEIR analysis. Therefore, project-related impacts are consistent with those evaluated in the PEIR, and no changed circumstances or new information of substantial importance have been identified. Because inclusion of areas outside the treatable landscape would not result in new or substantially more severe significant impacts, the Project would not result in new impacts related to energy resources.

3.7 Geology, Soils, Paleontology, and Mineral Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1 through GEO-8, AQ-3, AQ-4, HYD-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, AQ-3	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

The project area is located in Humboldt County and Trinity County within the Coast Ranges Geomorphic Province, and the Klamath Mountains Geomorphic Province. The Coast Ranges Geomorphic Province is characterized by northwest trending mountain ranges and valleys, and to the north are dominated by the Franciscan Complex (California Geological Survey 2002). The Klamath Mountains Geomorphic Province consists of rugged topography with prominent peaks and ridges, with local rocks including metamorphosed Paleozoic and Mesozoic oceanic rocks, abundant serpentinite, and granitic intrusions (California Geological Survey 2002); CDOC 2025). As discussed in the PEIR, the Franciscan complex consists of partially metamorphosed greenstone, basalt, chert, and graywacke that originated as sea floor sediments. Soils within the treatment areas vary substantially, with 47 different map units present in the area. The three largest map units present are Clallam-Hugo-Holland families association, deep, dry, 35 to 70 percent slopes (10.1

percent), Typic Xerofluvents-Riverwash association, 2 to 10 percent slopes (9.5 percent), Skalan-Kristirn-Holland families association, deep, 35 to 70 percent slopes (9.1 percent) (NRCS 2026).

The USGS Landslide Hazard program shows that the majority of the project area is considered to have a substantial susceptibility to landslides, and that there are a number of known or suspected landslides in the area, particularly towards the west (USGS 2026).

Impact GEO-1

The Project would include mechanical treatments, manual treatments, prescribed burning pile burning, herbicide, herbivory, and biomass processing. These treatment activities would result in vegetation removal and soil disturbance, which have the potential to increase rates of erosion and loss of topsoil.

The potential for these treatment activities to result in substantial erosion or loss of topsoil was examined in the PEIR and found to be less than significant. The potential impacts are within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. The implementation of the following SPRs would further minimize the risk of soil disturbance and loss of topsoil associated with treatment activities:

- SPR GEO-1, which requires the suspension of soil disturbing treatment activities during precipitation;
- SPR GEO-2, which limits high ground pressure vehicles that could cause soil disturbance or compaction on wet or saturated soils;
- SPR GEO-3, which requires stabilization of disturbed soil areas during treatment activities;
- SPR GEO-4, which requires inspection of the treatment area for proper erosion control measures prior to the rainy season and immediately following the first large rainfall event;
- SPR GEO-5, which requires stormwater to be drained via water breaks to decrease the potential for channelized erosion down linear treatment areas;
- SPR GEO-6, which minimizes the burn pile size to minimize the spatial extent of soil damage;
- SPR GEO-7, which minimizes erosion from use of heavy equipment and prescribed herbivory on slopes;
- SPR GEO-8, which will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas and unstable soils (soil with moderate to high erosion hazard);
- SPR HYD-3 which requires environmentally sensitive areas be excluded from herbivory projects, and that grazing animals are moved if erosion is observed;
- SPR HYD-4, which requires establishment of Watercourse and Lake Protection Zones to reduce erosion near streams;
- SPR AQ-3, which requires preparation of a burn plan and minimization of soil burn severity to reduce the potential for runoff and soil erosion; and

- SPR AQ-4, which requires wetting of unpaved dirt roads to control dust.

In addition, HCRCD proposes to revise SPR GEO-1, SPR AQ-3, and SPR AQ-4, all of which are applicable to this impact. SPR GEO-1 would be revised to suspend mechanical, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities resulting in loss of traction and spinning of tires or tracks. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. SPR AQ-3 would be revised to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures. SPR AQ-4 would be revised to remove dust, silt, and mud from vehicles any time it is visibly being tracked out onto public paved roadways, in accordance with Vehicle Code Section 23113. This revision is consistent with the purpose of SPR AQ-4 to avoid the creation of dust through treatment vehicles tracking out dust, silt, or mud. For the reasons described, and discussed in more detail in Section 2.5, “Proposed Revisions to CalVTP SPRs and Mitigation Measures,” proposed revisions to SPR GEO-1, SPR AQ-3, and SPR AQ-4 would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the slopes and soil characteristics of the project area are essentially the same within and outside the treatable landscape and SPRs would be implemented as described above. Therefore, the potential impact related to soil erosion is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GEO-2

The Project would include treatment activities that would result in the reduction of vegetative cover and affect root structure, decreasing the stability of slopes, which could increase the risk of landslides. The potential for treatment activities to increase the risk of landslides was examined in the PEIR and found to be less than significant. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR. In addition, the implementation of SPRs GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, and AQ-3 would minimize the potential for landslides from treatments.

In addition, HCRCD proposes to revise SPR GEO-1 and SPR AQ-3, both of which are applicable to this impact. SPR GEO-1 would be revised to suspend mechanical, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities resulting in loss of traction and spinning of tires or tracks.

Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. SPR AQ-3 would be revised to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures. For the reasons described, and as discussed in more detail in Section 2.5, “Proposed Revisions to CalVTP SPRs and Mitigation Measures,” proposed revisions to SPR GEO-1, and SPR AQ-3, would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the slopes and soil characteristics of the project area are essentially the same within and outside the treatable landscape and SPRs would be implemented as described above. Therefore, the potential impact related to landslide is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Overall, impacts relating to landslide risk resulting from the proposed project would not constitute new or substantially more severe significant impact than what was covered in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and has determined they are consistent with the environmental and regulatory settings discussed in the PEIR. The project proponent has also determined that the inclusion of the portion of the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions pertinent to geology and soils that are present within the treatable landscape are essentially the same as those areas outside the treatable landscape. Therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact to geology and soils would occur.

3.8 Greenhouse Gas Emissions

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	AD-3	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	SU	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact GHG-1

Vegetation treatments would involve manual and mechanical vegetation removal, prescribed burning, targeted grazing, and herbicide application, along with biomass disposal methods such as chipping, mastication, and burning. These activities would result in the generation of greenhouse gas (GHG) emissions. The PEIR concluded that treatments implemented under the CalVTP would be consistent with applicable plans, policies, and regulations aimed at reducing GHG emissions. The PEIR further determined that associated emissions would be less than significant due to the incorporation of SPRs, as well as the long-term climate benefits associated with reduced wildfire risk and improved ecosystem resilience.

The Project would be consistent with applicable statewide plans, policies, and regulations to reduce GHG emissions, including the 2022 Climate Change Scoping Plan developed by the California Air Resources Board (CARB 2022), the California Forest Carbon Plan (Forest Climate Action Team 2018), and the Draft 2030 Natural and Working Lands Climate Change Implementation Plan (CARB 2019). Consistency with the Climate Change Scoping Plan indicates that the Project would align with California's legislated GHG reduction targets for 2030 and support progress toward longer-term 2050 climate goals.

At the regional level, the Project would be consistent with the Humboldt County Regional Climate Action Plan (Humboldt County 2025), which identifies GHG reduction strategies and addresses the public health implications of increasing wildfire severity. The Project would also align with the Humboldt County General Plan (Humboldt County 2017), which includes goals and policies related to fire protection and wildland fire prevention through prescribed burning, vegetation management, and fuel break implementation. The Project would also be consistent with air quality goals and policies identified in the Trinity County General Plan Open Space and Conservation Element (Trinity County 1973). While Trinity County does not have a formally adopted Climate Action Plan as of May 2026, the Project would be consistent with the Forest and Water Resources Climate Adaptation Plan: Trinity County, CA (Medley-Daniel et al. 2011). This plan, developed by the Model Forest Policy Program, the Cumberland River Compact, and The Watershed Research and Training Center, outlines strategies to enhance forest health, watershed resilience, and climate adaptation capacity, which are supported by the proposed vegetation treatment activities.

Impacts related to GHG emissions from the project treatment activities are within the scope of the PEIR. The proposed activities, along with the associated equipment, duration of use, and resulting GHG emissions, are consistent with those analyzed in the PEIR. These impacts were found to be less than significant in the PEIR. SPRs applicable to the Project include SPR AD-3, which requires the treatments to be consistent with local plans, policies, and ordinances. SPR GHG-1 is not applicable to the Project; the Project is not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection's AB 1504 Carbon Inventory Process because this project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The inclusion of the 5,170.53 acres of the total 37,739.26 acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape as in areas within the treatable landscape. Therefore, the GHG impact is also the same as described above.

Impact GHG-2

The use of vehicles and mechanical equipment, herbicide application, prescribed grazing, biomass processing, and prescribed burning during both initial and maintenance treatments would result in

the generation of GHG emissions. However, these emissions would be relatively minor compared to those associated with high-intensity, uncontrolled wildfires. Implementation of the Project would reduce wildfire hazards, including fire intensity and rate of spread, thereby providing a long-term net benefit through the reduction of wildfire-related GHG emissions. The potential for vegetation treatments under the CalVTP to generate GHG emissions was evaluated in the PEIR and determined to be potentially significant and unavoidable. This impact is within the scope of the PEIR because the project activities, including the types of treatments, equipment used, and duration of implementation, as well as the objective of reducing wildfire risk and associated GHG emissions, are consistent with those analyzed in the PEIR.

SPR AQ-3 would be implemented under the Project to minimize soil burn severity during broadcast burning, thereby reducing the potential for runoff and soil erosion. This SPR requires the preparation and implementation of a burn plan developed with input from a qualified technician or a certified State burn boss. HCRCD has made minor revisions to SPR AQ-3, relative to the CalVTP PEIR, to allow for the preparation of burn plans using templates developed by the California State-Certified Burn Boss curriculum development committee. This modification remains consistent with the intent of SPR AQ-3, to ensure that prescribed burning is conducted in accordance with established burn planning and safety procedures and was necessary to facilitate effective implementation of the CalVTP's original requirements.

Treatment activities would contribute to annual GHG emissions generated under the CalVTP, and this impact would fall within the finding of the PEIR of potentially significant and unavoidable. Methods for reducing GHG emissions from burns would be integrated into SPR AQ-3 (Burn Plan).

The inclusion of the 5,170.53 acres of the 37,739.26 acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. The added acreage would not expand the total annual acreage of 250,000 acres per year proposed for treatment under the PEIR. However, GHG emissions and associated climate change impacts are global in nature and are not contained within the boundary of the treatable areas. Therefore, the GHG impact is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts Related to GHG Emissions

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The Project proponent has considered the site-specific characteristics of the proposed treatments and determined that they are consistent with the applicable regulatory and environmental conditions presented in the PEIR (Sections 3.8.1 and 3.8.2 in Volume II of the Final PEIR).

The inclusion of the 5,170.53 acres of the 37,739.26 total project acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape as within it. Likewise, the climate conditions are the same within the treatable landscape as they are just outside of it for the Project.

Therefore, impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances are present, and since the added acreage would not expand the total annual acreage of 250,000 acres per year proposed for treatment under the PEIR, the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. No new impact related to GHG emissions would occur.

3.9 Hazardous Materials, Public Health and Safety

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	SPR HAZ-1, SPR HYD-4	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	SPR HAZ 5-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ-3	LTSM	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact HAZ-1

Project activities would require the use of various types of equipment and vehicles, which require the use of fuels, oils, and lubricants, which are hazardous materials. In addition, accelerants could be used to implement prescribed burns. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was analyzed in the PEIR and the impacts were found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are

consistent with those analyzed in the PEIR. All equipment associated with the Project would comply with SPR HAZ-1, which ensures that equipment is properly maintained to minimize leaks.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential, use of hazardous materials and regulatory setting are essentially the same within and outside of the treatable landscape; therefore, the impact would also be the same. The impact of the Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-2

Herbicide application would occur on up to 31,413.47 acres of the project area, all located within Humboldt County. This would occur where sprouting species such as tanoak or invasive species are present. Herbicide application would involve transportation, use, storage, and disposal of herbicides, which could result in risks related to human exposure when applied in areas in close proximity to areas accessed by the public. Only ground-level application methods would be used such as painting cut stems or stumps and using backpack sprayers or hand applicators; no aerial spraying, broadcast spraying, or spraying from trucks would occur.

Only herbicides labeled for use in aquatic environments will be used when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses.

Herbicides that may be applied are listed below, which are consistent with those considered for use in the CalVTP:

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Velpar (hexazinone);
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E); and
- Esplanade (Indaziflam).

The potential for treatment activities to create a significant health hazard from the use of herbicides was analyzed in the PEIR and the impacts were found to be less than significant. The potential impacts related to the use of herbicides during treatment activities are within the scope of the activities and impacts discussed within the PEIR because the types of herbicides and application

methods that would be used, are limited to ground-based applications, which are consistent with those analyzed in the PEIR.

Under the CalVTP, herbicide treatment application must comply with all USEPA label directions as well as be applied by licensed applicators in compliance with all laws and regulations. The project would comply with SPR HAZ-5 through HAZ-9, which requires preparation of a Spill Prevention and Response Plan prior to any herbicide treatment activities to provide protection to workers, the public, and the environment from accidental spills or leaks of herbicides; compliance with herbicide application regulations to protect worker and public safety; triple rinsing herbicide containers and disposal of rinsed materials at an approved site and disposal of all herbicides following label requirements and waste disposal regulations; minimization of herbicide drift into public areas through application parameters such as limitations for nozzle pressure and nozzle distance from vegetation; and notification of herbicide application within 500 feet of public areas by posting signs at herbicide treatment areas.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential exposure to herbicides is essentially the same within and outside the treatable landscape. Therefore, the impact related to the potential for the Project to result in a significant health hazard from the use of herbicides is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-3

The Proposed Project would include treatments such as mechanical treatments and prescribed burning which could result in ground disturbance, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. Additionally, prescribed burning activities could lead to unexpected ignitions if ignitable hazardous waste were present, which could expose workers to risks associated with unexpected fire or explosions. The potential for the treatment activities to encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR and was identified as potentially significant. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards.

In evaluating the potential for effects related to the proposed project, database searches for hazardous materials sites within the project area were conducted as directed by MM HAZ-3 (Identify and Avoid Known Hazardous Waste Sites) (California Department of Toxic Substances Control [DTSC] 2026a, 2026b; State Water Resources Control Board [SWRCB] 2026a, 2026b; California Environmental Protection Agency [CalEPA] 2026). According to this database search, there are eleven hazardous materials sites located within the project area; however, cleanup has been completed and closed for all of them as of 2007 or before (SWRCB 2026a, 2026b). The full list of sites is as follows:

- B & J 's Gas Mart (T0610500016) – Complete and closed as of 1990
- Pilot Timber (T0602300308) – Complete and closed as of 1996
- CDOT Willow Creek Maintenance Station (T0602300035) – Complete and closed as of 1999
- Chevron #9-5293 (T0602300208) – Complete and closed as of 2001
- Bigfoot Gasmart (T0602300122) – Complete and closed as of 2002
- McKnight Redi-Mix (T0602300176) – Complete and closed as of 2003
- BP Mini Mart / Willow Creek (T0602300369) – Complete and closed as of 2004
- South Fork Mill (T0602300503) – Complete and closed as of 2004
- K-T JUSD Trinity Valley Elementary School (T0602300344) – Complete and closed as of 2004
- K-T JUSD Trinity Valley Elementary School (T0602336128) – Complete and closed as of 2004
- Union, Fork's (T0602300076) – Complete and closed as of 2007

In addition, the Project would not involve ground disturbance outside of the project area that would have the potential to disturb contaminated sites. Therefore, this impact would be less than significant with mitigation incorporated.

New Hazardous Materials, Public Health and Safety Impacts

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the hazardous materials impact related to exposing the public or environment to hazards from disturbance of known hazardous material sites is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

3.10 Hydrology and Water Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	AQ-3, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, HAZ-1, HYD-1, HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, GEO-8, HAZ-1, HYD-1, HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	N/A	NA	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	GEO-1, GEO-7, HAZ-1, HAZ-5, HAZ-7,	NA	LTS	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides				HYD-1, HYD-2, HYD-3, HYD-4, HYD-5, HYD-6				
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	AQ-3, BIO-4, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, GEO-8, HYD-1, HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

The project area is within the jurisdiction of the North Coast Regional Water Quality Control Board (RWQCB). It lies primarily within the Trinity River Hydrologic Unit (HU) and spans several hydrologic areas (HAs) and subareas (North Coast RWQCB 2026). Water bodies in the project vicinity include Willow Creek, Trinity River, Old Campbell Creek, Cedar Creek, and Horse Linto Creek. A portion of the project area lies within the South Fork Trinity River HA, which is impaired for sedimentation/siltation, temperature, and boron (North Coast RWQCB 2026; State Water Resources Control Board

[SWRCB] 2024). Additionally, portions of the project area lie within the Lower Trinity HA, which is impaired for sedimentation/siltation and aluminum (North Coast RWQCB 2026; SWRCB 2024).

The project area is roughly 20 miles inland from the coast and experiences high levels of precipitation (roughly 51 inches annually), particularly during November to April (Western Regional Climate Center 2026). Creeks in the area generally flow to Trinity River, which then flows to the Klamath River, which then ultimately discharges to the Pacific Ocean. Flows in the Trinity River at this location range from roughly 450 cfs to over 6,000 cfs based on the time of year and precipitation patterns (United States Geological Survey 2026). No mapped groundwater basins underlie the project area, with the nearest basin being the Hoopa Valley Groundwater Basin (very low priority), which is just to the north of the project area (California Department of Water Resources 2026).

Impact HYD-1

The Project would include prescribed burning (broadcast and pile). The potential impacts of these activities on water quality are described in the CalVTP PEIR (2019). Principally, this includes post-fire erosion and runoff changes, which can carry sediment and other pollutants to surface water bodies. Additionally, use of diesel- and gasoline-powered equipment during burn activities could result in the leaking of hazardous materials if equipment is not properly maintained. The PEIR identified the potential for prescribed burning treatments to violate water quality standards or waste discharge requirements, degrade surface or groundwater quality, or conflict with the implementation of a water quality control plan and concluded that implementation of SPRs would reduce these potential impacts to a less-than-significant level. Specifically, SPR AQ-3 would require creation of a burn plan, which would include modeling of fire behavior and minimization of soil burn severity, such as to reduce the potential for runoff and erosion. SPR GEO-3 through SPR GEO-7 would require stabilization of bare soil (e.g., with mulch) created through prescribed burns; inspection and remediation of erosion control measures; draining of compacted and/or bare linear treatment areas via water breaks; minimization of burn pile size; and restricting use of equipment and vehicles on steep slopes. SPR HAZ-1 requires that equipment used in support of prescribed burning is maintained per manufacturer's specifications. Finally, SPRs HYD-1, HYD-2, HYD-4, and HYD-6 require compliance with applicable waste discharge requirements (WDRs); avoidance of constructing new roads; identification and protection of Watercourse and Lake Protection Zones (WLPZs), and protection of existing drainage systems. Project-specific impacts related to hydrology and water quality are within the scope of the PEIR, as the proposed treatment activities are consistent with those analyzed in the program-level document. Therefore, implementation of these SPRs would avoid or minimize the adverse water quality effects of prescribed burning under the Project; thus, the impact would be less than significant.

In addition, the HCRCD proposes to revise SPRs GEO-1 and AQ-3, both of which are applicable to this impact. SPR GEO-1 would be revised to suspend mechanical, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities resulting in loss of traction and spinning of tires or tracks. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are

no longer saturated. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. SPR AQ-3 would be revised to prepare burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. This revision is consistent with the purpose of SPR AQ-3 to prepare and implement a burn plan and all required burn safety procedures. For the reasons described, and discussed in more detail in Section 2.5, “Proposed Revisions to CalVTP SPRs and Mitigation Measures,” proposed revisions to SPR GEO-1, and SPR AQ-3, would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the PEIR.

As described in Chapter 2, *Project Description*, portions of the project area extend outside of the treatable landscape described in the CalVTP PEIR. In total, these areas outside the treatable landscape encompass 5,170.53 acres of the 37,739.26-acre project area. This discrepancy is largely due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. The portions of the project area outside of the treatable landscape are dispersed in small sections around the project area and are not substantially different from the remaining acreage in terms of landscape conditions, such as slope and vegetation. As a result, the SPRs described above would avoid or minimize impacts outside of the treatable landscape. Therefore, the proposed activities would not constitute a more severe significant impact than analyzed and addressed in the PEIR.

Impact HYD-2

The Project would include mechanical and manual treatment activities. As described in the PEIR (2019), mechanical treatment activities would have potential to result in adverse effects on hydrology and water quality. This would include erosion and sedimentation (e.g., due to operation of heavy equipment on steep slopes) as well as releases of hazardous materials (e.g., fuel, oil,) contained in diesel- and gasoline-powered equipment. The PEIR identified the potential for manual or mechanical treatments to violate water quality standards or waste discharge requirements, degrade surface or groundwater quality, or conflict with the implementation of a water quality control plan and concluded that implementation of SPRs would reduce these potential impacts to a less-than-significant level. Specifically, SPRs GEO-1 through GEO-8 would require suspension of ground disturbance during heavy precipitation events; limiting use of heavy equipment when soils are wet and saturated; stabilization of disturbed soil areas (e.g., with mulch); inspection and remediation of erosion control measures; draining of compacted and/or bare linear treatment areas via water breaks; minimizing pile burn size; limiting use of heavy equipment on slopes; and evaluation of steep slopes proposed for treatment to avoid or reduce erosion. SPR HAZ-1 would require proper maintenance of diesel- and gasoline-powered equipment, while SPRs HYD-1, HYD-2, HYD-4, and HYD-6, would require compliance with applicable WDRs; avoidance of constructing new roads; identification and protection of WLPZs, and protection of existing drainage systems. The proposed treatment activities are consistent with the evaluation in the PEIR, and implementation of these SPRs would avoid or minimize the adverse water quality effects of mechanical and manual treatment under the Proposed Project. Thus, impacts would be less than significant.

As noted above, portions of the project area (amounting to 5,170.53 acres in dispersed sections) are outside of the CalVTP treatable landscape. However, this area is similar in nature to the remainder of the project area in terms of landscape characteristics. The SPRs described above would avoid or minimize impacts outside of the treatable landscape. Therefore, the proposed activities would not constitute a more severe significant impact than analyzed and addressed in the PEIR.

Impact HYD-3

The Project would include prescribed herbivory as a treatment activity, as described Chapter 2, *Project Description*. This could include use of goats, especially in areas with dense shrubs and forested areas, as well as cattle, especially in areas containing expansive acres of grassland. The potential impacts of prescribed herbivory activities on water quality are described in the CalVTP PEIR. They include denuding of vegetation, loss of soil structure and increased sedimentation, and accumulation of manure and urine which contribute nutrients and pathogens to adjacent waterbodies. The impacts primarily result from the tendency of grazing animals to congregate near water sources and in riparian areas where vegetation is lush and more abundant; however, these effects would be avoided or minimized through implementation of SPR HYD-3, which would exclude grazing animals from environmentally sensitive areas such as waterbodies, wetlands, or riparian areas using temporary fencing or active herding. Additionally, SPR HYD-3 includes provisions to provide alternative water sources for grazing herds and to move animals out of an area if accelerated soil erosion is observed. Implementation of this SPR, along with SPRs HYD-1 and HYD-4, and GEO-1, GEO-3, GEO-4, and GEO-7, would minimize potential impacts of prescribed herbivory under the proposed project. Therefore, the impact would be less than significant.

As described in preceding impact discussions and in Chapter 2, the project area includes 5,170.53 acres that are outside of the treatable landscape. However, these are dispersed in sections around the project area and are not substantially different from the remaining acreage in terms of landscape characteristics. Therefore, the use of prescribed herbivory in these areas would not constitute a more severe significant impact than analyzed and addressed in the PEIR.

Impact HYD-4

Herbicide application would occur on up to 31,413.47 acres in the project area where sprouting (e.g., tanoak) or invasive species are present. As described in Chapter 2, *Project Description*, only ground-level application would occur, with no aerial spraying of herbicides. All herbicide application would comply with USEPA label directions, as well as CalEPA and California Department of Pesticide Regulation label standards, and would be performed by certified and licensed pesticide applicators. The potential effects of herbicides on water quality are described in the PEIR and these generally include off-site movement of herbicides from runoff, leaching, drift, and misapplication or spills. Water quality impacts can also occur due to erosion and sedimentation caused by heavy equipment that may be used during herbicide applications. The PEIR identified the potential for herbicide application to violate water quality standards or waste discharge requirements, degrade surface or groundwater quality, or conflict with the implementation of a water quality control plan

and concluded that implementation of SPRs would reduce these potential impacts to a less-than-significant level. This includes SPR GEO-1 and GEO-7, which would require suspension of ground disturbance (e.g., from mechanical equipment used during herbicide applications) during heavy precipitation, and limitations on the use of heavy equipment on slopes. SPRs HAZ-1, HAZ-5, and HAZ-7 would require that diesel- and gasoline-powered equipment is properly maintained in accordance with manufacturer's specifications; a Spill Prevention and Response Plan (SPRP) is prepared prior to beginning herbicide treatment activities; and that herbicide and adjuvant containers are triple-rinsed at approved sites and properly disposed. Finally, SPRs HYD-1, HYD-2, HYD-4, and HYD-6, would require compliance with applicable WDRs; avoidance of constructing new roads; identification and protection of WLPZs, and protection of existing drainage systems. Project-specific impacts related to hydrology and water quality are within the scope of the PEIR, as the proposed treatment activities are consistent with those analyzed in the program-level document. Therefore, implementation of these SPRs would avoid or minimize the adverse water quality effects of herbicide application under the Project. Impacts would be less than significant.

As noted above, the project area includes 5,170.53 acres that are outside of the treatable landscape. However, these are dispersed in sections around the project area and are not substantially different from the remaining acreage in terms of landscape characteristics. Therefore, the use of herbicide applications in these areas would not constitute a more severe significant impact than analyzed and addressed in the PEIR.

Impact HYD-5

The Project would include ground-disturbing activities that would have potential to alter existing drainage patterns. As described in the PEIR, non-shaded fuel breaks have the greatest potential for adverse effects related to alteration of drainage patterns. The PEIR identified the potential for treatments to substantially alter the existing drainage pattern of a treatment site or area and concluded that implementation of SPRs would reduce these potential impacts to a less-than-significant level. The Project would mostly include shaded fuel breaks (i.e., retaining a thinned canopy layer), while unshaded fuel breaks may be implemented in areas that contain only shrubs (i.e., no tree canopy). Implementation of SPRs would avoid or minimize potential impacts associated with the proposed activities (including prescribed burning, mechanical and manual treatment, and potentially herbicide applications). As noted above, SPR AQ-3 would require creation of a burn plan to reduce potential for runoff and erosion. SPR BIO-4 would design treatments to avoid loss or degradation of riparian habitat, including limiting ground disturbance in riparian areas. SPRs GEO-1 through GEO-8 would require suspension of ground disturbance during heavy precipitation events; limiting use of heavy equipment when soils are wet and saturated; stabilization of disturbed soil areas (e.g., with mulch); inspection and remediation of erosion control measures; draining of compacted and/or bare linear treatment areas via water breaks; minimizing pile burn size; limiting use of heavy equipment on slopes; and evaluation of steep slopes proposed for treatment to avoid or reduce erosion. SPRs HYD-1, HYD-2, HYD-4, and HYD-6 would require compliance with applicable WDRs; avoidance of constructing new roads; identification and protection of WLPZs, and protection of existing drainage systems. With implementation of these SPRs, impacts would be less than significant.

As discussed above, the project area includes 5,170.53 acres that are outside of the treatable landscape. However, these are dispersed in sections around the project area and are not substantially different from the remaining acreage in terms of landscape characteristics. Therefore, the SPRs described above would avoid or minimize impacts outside of the CalVTP treatable landscape. The proposed activities would not constitute a more severe significant impact than analyzed and addressed in the PEIR.

New Hydrology and Water Quality Impacts

The project treatments are consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the PEIR (refer to Sections 3.11.1 and 3.12 in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Additionally, the proposed changes to SPR AQ-3 and GEO-1 would not substantially lessen the effectiveness of these measures with respect to hydrology and water quality and would not result in substantially worsened effects compared to the PEIR. Therefore, no new impact related to hydrology and water quality would occur.

3.11 Land Use and Planning, Population and Housing

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	AD-3	N/A	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	N/A	N/A	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact LU-1

All project treatments and treatment maintenance activities would take place on public and private lands in the vicinity of Willow Creek in Humboldt County and Salyer and Hawkins Bar in Trinity County, collectively known as the Greater Willow Creek area. SPR AD-3 (Consistency with Local Plans, Policies, and Ordinances) requires that the project proponent design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans), policies, and ordinances to the extent the Project is subject to them. As described in “Biological Resources,” the Project would be consistent with local policies protecting biological resources. As described in “Noise,” treatment activities would occur consistent with the local ordinances of Humboldt and Trinity Counties.

The communities of Willow Creek, Salyer, and Hawkins Bar are rural and unincorporated communities with an approximate combined population of 2,500. The Greater Willow Creek area sits within the Six Rivers National Forest and is situated along the Trinity River. Land use types within the Humboldt County treatment area are classified as Residential Estates, Residential Low Density, Residential Agricultural, Commercial Services, Commercial General, Commercial Recreation, Mixed Use, Industrial General, Industrial Resource Related, Conservation Floodway, Open Space, Public Facility, Public Lands, Tribal Lands, Timberland, Agricultural Exclusive, Agricultural Grazing, Airport. Land use types within the Trinity County treatment area are classified as Resource, Rural Residential, Agriculture, and State, Federal, Other Public Lands. The zoning designations within the Humboldt County treatment area are classified as Neighborhood Commercial, Community Commercial, Highway Service Commercial, Heavy Industrial, Flood Plain, Residential Suburban, Residential One-Family, Apartment Professional, Agricultural Exclusive, Agricultural General, Forestry Recreation, Timberland Production, and Unclassified (Humboldt County 2026). The zoning designations within the Trinity County treatment area are classified as Single Family Residential, Mobile Home Park, Highway Commercial, Timber Production Zone, and Unclassified (Trinity County 2026). The potential for treatment activities to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the PEIR and was found to be less than significant. The potential for vegetation treatment activities to cause a significant environmental impact is within the scope of the PEIR because the treatment types and activities are consistent with those evaluated in the PEIR. SPR AD-3 is applicable to the Project, and it requires project treatments to be consistent with local plans, policies, and ordinances.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, because the land uses in the project area are generally the same within and outside the treatable landscape, the land use impact is also the same. No conflict would occur because the project proponent would adhere to SPR AD-3. This determination is consistent with the PEIR and would not constitute a more severe impact than that which is described in the PEIR.

Impact LU-2

The PEIR evaluated the potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees, which was found to be less than significant. Impacts associated with a short-term increase in the demand for workers during implementation of the treatment project are within the scope of the PEIR because the number of workers required for the Project is consistent with the crew size analyzed in the PEIR for the types of treatments proposed. Additionally, as evaluated in the PEIR, the workforce needed for project treatments and maintenance can largely be met by hiring local residents near the treatment areas. While some employees may relocate to meet workforce demands, adequate housing is expected to be available to accommodate those who move from outside the region.

The inclusion of land in the project treatment area that is outside the CalVTP treatable landscape is considered a change to the geographic extent presented in the PEIR. However, because the population and housing characteristics of the project area are basically the same within and outside

the treatable landscape, the population and housing impact is also the same, as described above. There are no SPRs applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than that which was evaluated in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The Proposed Project is consistent with the treatment types and activities described in the PEIR. The project proponent has considered the site-specific characteristics of the Proposed Project and determined they are consistent with the applicable environmental and regulatory conditions described in the PEIR (refer to Sections 3.12.1, “Environmental Setting,” and 3.12.2, “Regulatory Setting,” in Volume II of the Final PEIR). The project proponent has also determined that including land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project area boundary, the existing conditions relevant to land use and planning, population, and housing that are present in the areas outside the treatable landscape are very similar to those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those disclosed in the PEIR. No changed circumstances are present and the inclusion of lands outside the CalVTP treatable landscape would not result in any new impacts. In conclusion, no new impact related to land use and planning, population, and housing would occur.

3.12 Noise

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, NOI-6	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact NOI-1

The project treatment activities that have the potential to create a short-term increase in the ambient noise level include prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, and biomass processing. Specifically, prescribed burning activities for the Project may involve bulldozers to create control lines and a helicopter with a helitorch for ignition. Mechanical treatments could include heavy construction equipment such as excavators, masticators, tracked and wheeled chippers, skid steers, and dozers. Manual treatments would use hand-operated power tools, including chainsaws and pole saws. Biomass processing activities would include heavy construction equipment such as excavators, masticators, tracked and wheeled chippers, and skid steers. Additionally, prescribed herbivory would temporarily increase animal

noises within portions of the project area; however, these activities would not require the use of heavy off-road equipment. Although noise generated by prescribed herbivory would be generally minimal, it is discussed further in this section because the local jurisdictions where the Project is located have ordinances specifically related to animal noise.

Prescribed burning, manual and mechanical treatments, and biomass processing would occur on weekdays during daylight hours, between 6:00 am and 7:00 pm. If implementation of treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. Prescribed herbivory would potentially occur 24 hours a day, but as noted in the PEIR, it would not require the use of heavy off-road equipment; and human-generated noise associated with herbivory treatments would only occur within the allowable daylight hours previously identified. When work is conducted within a jurisdiction with more restrictive noise ordinance, treatments would be conducted within the allowable hours for noise-generating activities.

Multiple crews may be working at the same time and conducting prescribed burns, mechanical treatments, manual treatments, and biomass processing as well as using mechanical and manual methods that may generate varying noise levels, temporarily increasing ambient noise in the vicinity. Although the Project is situated in a rural area, private residences and other noise-sensitive land uses such as parks and recreation facilities, and schools and may still be located near the Project site and treatment activities and could be temporarily exposed to elevated noise levels. The Project is located within unincorporated Humboldt and Trinity Counties and would be consistent with both the Humboldt and Trinity County Noise Elements (Humboldt County 2017; Trinity County 2003).

The potential for construction equipment associated with treatment activities to cause substantial short-term increases in the exterior ambient noise level was addressed in the PEIR and was found to be less than significant. This impact is within the scope of the PEIR because the types of treatments and associated equipment, and thus the noise generated, are consistent with those analyzed in the PEIR. SPRs applicable to the proposed project include AD-3, which requires the treatments to be consistent with local plans, policies, and ordinances. As described in the project description, all noise-generating treatments would occur primarily on weekdays during daylight hours only, between 6:00 am and 7:00 pm. If implementation of treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. Construction noise-generating treatments would be compliant with the Humboldt and Trinity Counties' construction noise requirements, which state that construction activities should occur during normal work hours and non-noise-sensitive times of day. Table N-S7 of the Humboldt County General Plan (Humboldt County 2017) summarizes the noise ordinances applicable to the Project. Chapter 4 of the Trinity County General Plan, Noise Element (Trinity County 2023) summarizes the noise goals and policies applicable to the Project. Noise-generating treatments would comply with the local regulations outlined in Table N-S7 of the Humboldt County General Plan and Chapter 4 of the Trinity County General Plan Noise Element, and therefore all work would be within the allowable limits in accordance with SPR AD-3.

Humboldt County and Trinity County maintain ordinances (Section 314.43.3.3 and Section 6.04.050, respectively) that prohibit the keeping of animals that frequently or continuously generate noise that

disturbs the peace and quiet of a reasonable person. While livestock such as cattle, sheep, and goats may be used for prescribed herbivory treatments within Humboldt County, herbivory treatments would not be used within treatment areas in Trinity County. Noise generated by livestock may be perceptible to sensitive receptors on nearby properties; however, these noises are generally low in intensity, would occur only temporarily while animals are present within a treatment area, and are not anticipated to conflict with the requirements of the Humboldt County ordinance (Section 314.43.3.3).

The loudest noise sources associated with prescribed herbivory treatments would generally be related to supporting human activities, including truck transport of livestock and the use of motorized equipment to establish and manage treatment areas. Because livestock would only be present for limited periods in any given location and would not be expected to generate continuous or excessive noise levels that would violate applicable local ordinances, impacts related to animal-generated noise would be less than significant.

Additional SPRs applicable to the Project include NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6, which would require that heavy equipment be used only during daytime hours; all equipment be properly maintained; engine shrouds be closed during mechanical equipment operation and idle time be restricted to 5 minutes; all staging areas be placed away from noise sensitive land types; and any noise sensitive receptors be notified ahead of work. As identified in the PEIR, the implementation of these SPRs would minimize impacts to ambient noise levels from equipment used during prescribed burning, manual or mechanical treatments, and biomass processing, such as bulldozers, helicopters, hand-powered tools, bucket trucks, tow chippers, track chippers, fire engines, and riding lawn mowers, ensuring that noise-related effects remain less than significant.

The inclusion of the 5,170.53 acres of the project area that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, the added acreage would not expand the total annual acreage of 250,000 acres per year proposed for treatment under the PEIR, and the proposed treatments within and outside of the treatable landscape are the same as analyzed in the PEIR. The environmental conditions outside the treatable landscape are essentially the same as those within it, as both areas are subject to the same noise ordinances and share comparable noise-sensitive receptors. Therefore, the noise impact is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact NOI-2

Project treatment activities would require large trucks to haul equipment and crews to the project area. While trucks would pass residential sensitive receptors, it is not anticipated that project traffic would result in a substantial increase in truck-generated noise along local roads. These large trucks have the potential for a substantial short-term increase in single-event noise levels (SENLs), but would only be in use during daytime hours, between 6:00 am and 7:00 pm. If implementation of treatments is required on weekends or holidays, work will occur between 9:00 am and 5:00 pm. As

identified in Impact NOI-1, the Project would also be in compliance with other more stringent local noise ordinances (see Impact NOI-1). The impacts are within the scope of the PEIR because the treatment activities and methods are the same as those analyzed in the PEIR. SPRs applicable to this treatment are AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6, described under Impact NOI-1. The potential for a substantial short-term increase in SENL during the project treatments was evaluated in the PEIR and was found to be less than significant with the implementation of these SPRs.

The inclusion of the approximately 5,170.53 acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. For much of the project area, the existing roadway network and access roads used by the worker vehicles and trucks for hauling would be the same to reach the treatable landscape inside the CalVTP as outside the CalVTP. Therefore, the noise impact is also the same as described above and would be less than significant with the application of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Noise Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the PEIR (Sections 3.13.1 and 3.13.2 in Volume II of the Final PEIR).

The inclusion of the approximately 5,170.53 acres of the 37,739.26-acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as previously described. Therefore, the impacts are the same and for the reasons described above, impacts of the Proposed Project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not create any new significant impact beyond what was addressed in the PEIR. No new impact related to noise or the noise environment that is not covered in the PEIR would occur. Therefore, no new impact related to noise would occur.

3.13 Recreation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	REC-1; AD-3	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact REC-1

The project treatment areas are located within and surrounded by the Lower Trinity Ranger District of the Six Rivers National Forest and portions of the Big Bar Ranger District of the Shasta-Trinity National Forest. Due to the pattern of land ownership and jurisdiction within the project vicinity, the treatment areas are shown on maps as disjointed and scattered. These areas primarily consist of LRAs that are interspersed within and surrounded by SRAs and federal lands. The configuration of the treatment areas reflects the location of treatable lands under local jurisdiction rather than a continuous treatment footprint.

The project treatment areas are located in a region that contains a variety of recreational opportunities. Within the town of Willow Creek, local recreational amenities include Veterans Park, a disc golf course, and multiple public river access points along the Trinity River. In addition, portions of the project treatment areas are located within the vicinity of recreational lands managed by the Bureau of Land Management, the Hoopa Valley Reservation, the U.S. Forest Service, and other

public agencies. Existing roadways within the project treatment areas, including SR 299, SR 96, and local access roads, provide access to these recreational resources.

The potential for vegetation treatment and maintenance activities to directly or indirectly affect recreational activities was evaluated in the PEIR (PEIR, Volume II, pp. 3.1-6 and 3.14-7). The proposed treatment types and activities are consistent with those analyzed in the PEIR; therefore, the potential for recreation-related impacts remains within the scope of the PEIR analysis. SPR AD-3 requires project vegetation treatment and maintenance activities to be consistent with applicable local plans, policies, and ordinances, while SPR REC-1 requires notification to be posted at least two weeks prior to the commencement of treatment activities when temporary closures are necessary. SPR REC-1 also requires project proponents to notify agencies or officials responsible for disseminating public information regarding recreational access. With implementation of SPR AD-3 and SPR REC-1, impacts to recreational activities would be less than significant. Additional indirect impacts to recreation, including those related to air quality, traffic, and scenic resources, are evaluated in the “Aesthetics,” “Air Quality,” and “Transportation” sections of the PEIR (PEIR, Volume II, Sections 3.2, 3.4, and 3.15, respectively).

The inclusion of the 5,170.53 acres of the project area that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic treatment area evaluated in the PEIR. However, the added acreage would not expand the total annual acreage of 250,000 acres per year anticipated for treatment statewide under the CalVTP PEIR, and the proposed treatments within and outside of the treatable landscape are the same as analyzed in the PEIR. The environmental conditions outside the treatable landscape are essentially the same as those within it. This is because recreational uses in these areas are substantially similar to those occurring within the treatable landscape because they are located within the same regional setting characterized by national forest lands, dispersed recreation opportunities, river access, and local community recreation facilities. The proposed treatment activities would result in the same types of recreational resource impacts previously evaluated in the PEIR. Implementation of SPR AD-3 and SPR REC-1 would minimize disturbance to recreational activities within and adjacent to the project treatment areas. Accordingly, this determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than previously analyzed.

New Recreation Impacts

The Project is consistent with the treatment types and activities considered in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the PEIR (refer to Sections 3.14.1 and 3.14.2 in Volume II of the Final PEIR).

The inclusion of the approximately 5,170.53 acres that are located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, recreational uses in the area outside the treatable landscape are the same as those within the treatable landscape. The area outside the treatable landscape is directly adjacent to the proposed treatment area. The proposed treatment activities would have the same

recreational resource impacts as discussed above. Implementation of SPR AD-3 and SPR REC-1 would minimize disturbance to recreational activities within and in the vicinity of the project area, therefore, impacts would be less than significant.

3.14 Transportation

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3, TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	AD-3, TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	NA	PSU	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact TRAN-1

The Project would require the use of public roadways to access existing fire roads, skid roads, and trails leading to the specific treatment areas and would temporarily increase vehicular traffic due to hauling equipment and crew transportation. Project-related traffic would include heavy-vehicle trips to haul equipment and materials and worker commute trips to and from the treatment areas. Crew sizes would vary but would typically be fewer than 25 workers per site, per day, however multiple

crews may work at the same time. The total number of workers on the project site would be unlikely to exceed 50 at any time. No road closures would be necessary for the implementation of the Project.

The potential for a temporary increase in vehicle traffic associated with the proposed project work to conflict with a program, plan, ordinance, or policy addressing roadway facilities, or for prolonged road closures, was examined in the PEIR and found to be less than significant. The proposed temporary increases in traffic related to the Project is within the scope of the PEIR because the short-term treatment duration and limited number of vehicles associated with the proposed treatments are consistent with those analyzed in the PEIR. The proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed over time, and on multiple roadways depending on the particular access location. Implementing SPR AD-3 requires the treatments to be consistent with local plans, policies, and ordinances. Additionally, SPR TRAN-1 would require that the project proponent implement a traffic management plan (TMP) and that traffic control measures be placed on affected roadways during project treatment activities, should those activities result in obstructions, delays or hazards exceeding applicable jurisdictional standards. Direct and indirect smoke impacts related to roadway visibility driver distraction would also be considered during this process. This would work to minimize potential traffic obstructions, hazards, and service level degradation along affected roadway facilities, including any evacuation routes.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing transportation conditions (e.g., roadways, road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because they continue beyond the treatable landscape and are under the same jurisdictions and would be subject to the same programs, plans, ordinances, or policies regarding roadway facilities and closures. Therefore, the transportation impact is also the same and would be less than significant with the implementation of the same SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact TRAN-2

Project activities would not involve the construction or alteration of any roadways. However, proposed treatments include burning which due to the smoke produced has the potential to temporarily affect visibility on nearby roadways and therefore increase transportation hazards. Furthermore, the proposed treatments could require the transportation of heavy equipment along narrow or steep roadways, which could create increased transportation hazards due to incompatible uses. The potential for increased hazards along roadways during implementation of the treatment project was examined in the PEIR.

SPRs applicable to this treatment are AD-3 and TRAN-1, described above under Impact TRAN-1. Therefore, the project treatment activities would not substantially increase hazards due to a design feature or incompatible uses, and impacts would be less than significant. This impact is consistent

with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR because the activity type and duration are consistent with those analyzed in the PEIR.

The project area includes land that is outside the CalVTP treatable landscape. While this constitutes a change to the geographic area considered in the PEIR, the existing environmental conditions for the land outside the treatable landscape and on the land inside the treatable landscape are essentially the same. The existing transportation conditions (e.g., roadways, road use) present in the areas outside the CalVTP treatable landscape are essentially the same as those within the treatable landscape because they continue beyond the treatable landscape. Therefore, the potential to increase hazards is the same for project areas outside the CalVTP treatable landscape as for areas within the treatable landscape. As a result, the impact to increased hazards is also the same and within the scope of the PEIR. The Project would result in a less-than-significant impact related to increasing road hazards and would not result in a more significant impact than covered in the PEIR.

Impact TRAN-3

The project treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the project access locations are in semi-remote locations along fire roads and other small, local roadways. Therefore, vehicle trips would be required to access the treatment areas which would temporarily increase the total VMT in the area.

The number of truck trips and worker vehicle trips to and from the project area would vary based on the size of the area being treated and the type of treatment being implemented. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as stated in Impact TRAN-3 of the PEIR and described in the *Technical Advisory on Evaluating Transportation Impacts* published by the Governor's Office of Planning and Research (Governor's Office of Planning and Research 2018), individual projects under the CalVTP that are likely to generate fewer than 110 trips per day are expected to cause a less-than-significant transportation impact for specific later activities. As presented in the PEIR, this amount would allow for up to 55 vehicles hauling materials and bringing crew and equipment to and from the project site in a single day. Because of the small sizes of the crews needed for the proposed project, the limited equipment needed, and the limited materials to be hauled in any one day, as discussed above in Impact TRAN-1, it is not expected that VMT would typically exceed 110 trips per day. Additionally, as identified above under Impact AQ-1, MM AQ-1 would be implemented to the extent feasible to reduce exhaust emissions impacts from on- and off-road vehicles. While carpooling would be encouraged under Mitigation Measure AQ-1, crew sizes would be small and may not all be employed with the same company and would therefore not be a feasible option in all cases.

Based on this, the potential for the Project to result in a net increase in VMT would be less than significant as it pertains to the activities of the Project. The impacts from the Project would not be substantially more severe than those described in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing transportation conditions (e.g., roadways, road use) present in the areas outside the CalVTP treatable landscape are essentially the same as those within the treatable landscape. Therefore, the transportation impact identified in the PEIR for individual projects is also the same, as described above.

New Transportation Impacts

The proposed treatments are consistent with the treatment types and activities covered in the PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the PEIR (refer to Sections 3.15.1 and 3.15.2 in Volume II of the Final PEIR).

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as previously described. The Project is consistent with the types of projects covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to transportation would occur.

3.15 Public Services, Utilities and Service Systems

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	NA	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 -3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	Yes	AD-3; UTIL-1	NA	LTS	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	AD-3; UTIL-1	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact UTIL-1

A minimal amount of water would be required for fire suppression during prescribed burning activities, livestock support during prescribed herbivory activities, and for dust control during vegetation removal within non-shaded fuel breaks. Water would be transported via water trucks and fire trucks. PEIR Section 3.12, “Land Use and Planning, Population and Housing,” determined treatment activities would not lead to residential community development or other development that may increase demand for water. Therefore, impacts were found to be less than significant. The Project’s impacts are consistent with those analyzed in the PEIR because the amount of water required for prescribed burning, herbivory, and dust control is within the scope of activities and impacts determined in the PEIR. Due to the minimal amount of water required for these treatment activities, there would be minimal water demand on local water providers. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The Project includes 5,170.53 acres that are located outside the CalVTP treatable landscape in the proposed treatment area and constitutes a change to the geographic extent presented in the PEIR. Within the boundary of the project area, the existing conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape because the water service providers would be the same. Within and outside the treatable landscape, water providers and water use would essentially be the same, therefore, this impact is within the scope of the PEIR and can be considered less than significant impacts. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact UTIL-2

Mechanical and manual vegetation treatments would generate organic woody biomass as a result of vegetation removal within the project treatment areas. Methods for managing and processing biomass for this Project include natural decomposition (e.g., chip and broadcast, mastication and broadcasting, and lop and scatter), pile burning, biochar burning, and prescribed fire. Natural decomposition is the preferred method of biomass management, comprising approximately 50 percent of estimated processed biomass, because natural decomposition aids in erosion prevention and excessive soil disturbance, prevents the spread of disease and pathogens off-site, and reduces greenhouse gas emissions that result from transporting materials off-site. If broadcasting woody material is not possible, the remaining biomass would be disposed of via pile burning, air curtain burning, biochar burning, or prescribed burning. The potential to generate solid waste in excess of state standards was examined in the PEIR and was found to be a less-than-significant impact. SPRs AD-3 and UTIL-1 would apply to this potential impact. SPR AD-3 requires the project proponent to design and implement the project consistent with local plans and ordinances, and SPR UTIL-1 requires the project proponent to prepare a Solid Organic Waste Disposition Plan to guide biomass

disposal. The impact is within the scope of the activities and impacts identified in the PEIR as the conditions for removing biomass are consistent with the analysis in the PEIR.

Prescribed herbivory treatments would also generate small amounts of solid waste in the form of animal waste associated with the temporary presence of livestock within treatment areas. However, prescribed herbivory is not anticipated to result in significant accumulations of solid animal waste in any one location because livestock would be actively managed and moved frequently throughout treatment areas and would not remain in a single location for extended periods. Animal waste generated during grazing activities would naturally decompose on-site and would not require collection, transport, or disposal at a permitted solid waste facility. As discussed above in Sections 3.3, “Air Quality,” and 3.12, “Noise,” livestock utilized for prescribed herbivory would be managed in accordance with applicable local animal management, containment, and nuisance ordinances. Compliance with these requirements would minimize the potential for localized nuisance conditions associated with animal waste and ensure that grazing operations remain compatible with surrounding land uses. The Project does not anticipate hauling animal waste off-site, and the generation and management of animal waste associated with prescribed herbivory would be consistent with the treatment activities and impact determinations evaluated in the PEIR.

The PEIR found that while some localities within the state may currently have the requisite infrastructure to process woody biomass or may develop this capacity in the near future, it cannot be guaranteed that all localities across the state would develop the capacities to process excess solid organic waste produced from treatment activities within the timeframes of the proposed activities. Therefore, because feasible mitigation is not available, and to not risk understating potential future impacts in light of uncertainties about market response, the PEIR classified this impact as potentially significant and unavoidable, notwithstanding the possibility that capacity could increase with the scale of treatments such that it would not be exceeded for most or all individual treatments. However, biomass is not anticipated to be hauled off-site for this Project. Considering biomass is not anticipated to be hauled off-site, the Project’s impact to solid waste disposal is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The Project includes 5,170.53 acres that are located outside the CalVTP treatable landscape in the proposed treatment area and constitutes a change to the geographic extent presented in the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape because they are adjacent to the treatable landscape, would generate a similar amount of solid waste, and would use the same biomass disposal methods. The Project reflects a lesser impact than the statewide program, and the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-3

Project treatments would generate biomass as a result of vegetation removal within the project area. Biomass would be managed and disposed of through natural decomposition (e.g., chip and broadcast, mastication and broadcasting, and lop and scatter), pile burning, air curtain burning,

biochar burning, and prescribed fire. All biomass would be disposed of on-site; no off-site disposal would occur for this Project. Prescribed herbivory treatments would also generate minor amounts of animal waste associated with the temporary use of livestock. However, livestock would be actively managed and moved frequently throughout treatment areas and would not remain in any one location for extended periods. As a result, animal waste would not accumulate in substantial quantities in any one area and would naturally decompose on-site. No collection, transport, or off-site disposal of animal waste is anticipated. Livestock used for prescribed herbivory would be managed in accordance with applicable local animal management and nuisance ordinances, as discussed above in Sections 3.3, “Air Quality,” and 3.12, “Noise.” The Project would be in compliance with federal, state, and local goals related to solid waste, as required by SPR AD-3. The Project would apply SPR UTIL-1, which requires implementation of a Solid Organic Waste Disposition Plan. The Project is within the scope of activities and impacts identified in the PEIR.

The inclusion of approximately 5,170.53 acres located outside the CalVTP treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape because they are adjacent to the treatable landscape and would generate similar types and amounts of biomass and incidental animal waste associated with prescribed herbivory, and would utilize the same biomass management methods. No off-site disposal of biomass would occur on lands outside the treatable landscape. Therefore, the impact related to compliance with federal, state, and local goals and regulations regarding solid waste would be less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatments within 5,170.53 acres located outside the CalVTP treatable landscape are consistent with the treatment types and activities considered in the PEIR. The site-specific characteristics of the proposed treatments have been considered and found to be consistent with the applicable environmental and regulatory conditions presented in the PEIR (refer to Sections 3.16.1, “Environmental Setting,” and 3.16.2, “Regulatory Setting,” in Volume II of the Final PEIR). The inclusion of these additional lands in the proposed treatment area that are outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, as described above. Therefore, the impacts of the Project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to public service, utilities, and service systems would occur that is not covered in the PEIR.

3.16 Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	HAZ-2, HAZ-3, HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	AQ-3, GEO-3, GEO-4, GEO-5, GEO-8	NA	LTS	No	Yes

¹NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact WIL-1

The primary goal of the Project is to implement and maintain protective buffers around communities to shield them from catastrophic wildfires, as well as protecting timber resources and ecological values. In the event of a wildfire, the implemented Project would also provide safe access for fire engines and firefighting personnel, support the creation of fire lines, and potentially slow the spread and lower fire intensity.

Initial and maintenance treatments would include pile burning, prescribed (broadcast) burning, and mechanical treatments, which could result in temporary risks associated with uncontrolled wildfire, accidental wildfire ignition, or risk of a prescribed fire escaping its control lines. The potential

increase in exposure to wildfire during implementation of treatments was examined in the PEIR and found to be less than significant because activities are conducted under controlled conditions with safety measures that minimize fire risk while reducing long-term hazard. Increased wildfire risk associated with prescribed pile burning, prescribed burning, and use of heavy equipment in vegetated areas is within the scope of the PEIR.

SPRs HAZ-2, HAZ-3, and HAZ-4 would be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors on mechanical hand tools, requiring crews to carry one fire extinguisher per chainsaw, and prohibiting smoking in vegetated areas. HCRCD and cooperating agencies would implement these SPRs and have made minor project-specific refinements to SPR HAZ-3. The proposed revisions to SPR HAZ-3 include requiring a minimum of one backpack type fire extinguisher filled with water, enough firefighting tools for each worker at each job site, and equipping each vehicle with the required hand tools for firefighting and one fire extinguisher. As described in Section 2.5, these refinements to SPR HAZ-3 do not alter the intent of the SPR and would not result in new or substantially more severe environmental impacts beyond those evaluated in the PEIR. Based on the implementation of these SPRs, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact WIL-2

The potential for post-fire flooding and erosion, including landslides, was examined in the PEIR and found to be less than significant because the treatments are designed to reduce wildfire severity, which in turn lowers the risk of intense burn conditions that typically lead to soil destabilization and runoff. Additionally, the treatments follow best management practices that help preserve soil structure and minimize disturbance, thereby reducing the likelihood of post-fire hydrologic hazards. Mechanical treatment activities would occur predominantly on slopes below 40 percent grade and along ridges and may occur on slopes greater than 40 percent grade with equipment that can reach target vegetation from existing road infrastructure or another stable operating surface. Mechanical treatments would not be applied on slopes above 50 percent grade unless the above conditions are met.

Implementation of SPRs AQ-3, GEO-3 through GEO-5, and GEO-8 would reduce the risk of erosion and landslides post-prescribed burn and/or post-fire, in the event that a wildfire occurred as a result of the proposed treatments or an unrelated occurrence. SPR GEO-3 requires stabilization of disturbed soil areas during treatment activities; SPR GEO-4 requires inspection of the treatment area for proper erosion control measures prior to the rainy season and immediately following the first large rainfall event; and SPR GEO-5 requires stormwater to be drained via water breaks to

decrease the potential for channelized erosion within linear treatment areas. SPR GEO-8 requires the input of a RPF or licensed geologist to evaluate treatment areas with a 50% grade or more that are unstable or have unstable soils. As described in Impact WIL-1, the Project intends to reduce wildfire risk, in part by creating and maintaining fuel breaks that would serve as an opportunity for fire resources to stop or slow the spread of wildfire, which may lead to smaller burn scars, or less area susceptible to post-fire flooding or erosion.

Implementation of SPR AQ-3, which requires the preparation of a burn plan using the CAL FIRE burn plan template prior to prescribed burning treatment activities, would minimize soil burn severity during prescribed burns and in turn help retain vegetation by stabilizing the soil. HCRCD proposes to revise SPR AQ-3 by preparing burn plans prior to prescribed burning activities using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee. The burn plan templates that would be used by the HCRCD would include all elements of CAL FIRE burn plans, as described in the CAL FIRE Prescribed Fire Guidebook. As described in Section 2.5, these refinements to SPR HAZ-3 do not alter the intent or effectiveness of the SPR and would not result in new or substantially more severe environmental impacts beyond those evaluated in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the post-fire landslide risk of the project area is essentially the same within and outside the CalVTP treatable landscape due to similar slopes, soils, hydrological and geological conditions. Therefore, the wildfire impact outside the treatable landscape is also the same and less than significant, as described above, with implementation of the same SPRs. The impact outside the treatable landscapes would be consistent with the lands analyzed in the PEIR.

New Impacts to Wildfire

The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR. The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project treatments are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to wildfire risk would occur.

4 List of Abbreviations

A

AB Assembly Bill

B

BMP Best Management Practice
BIOS Biogeographic Information and Observation System
BOF Board of Forestry and Fire Protection

C

CAAQS California ambient air quality standards
CalEPA California Environmental Protection Agency
CAL FIRE California Department of Forestry and Fire Protection
Cal-IPC California Invasive Plant Council
CalVTP California Vegetation Treatment Program
CARB California Air Resources Board
CCR California Code of Regulations
CDOC California Department of Conservation
CDFW California Department of Fish and Wildlife
CEQA California Environmental Quality Act
CESA California Endangered Species Act
CNDDDB California Natural Diversity Database
CNPS California Native Plant Society
CRHR California Register of Historical Resources
CRPR California Rare Plant Rank
CWHR California Wildlife Habitat Relationships
CWPP Community Wildfire Protection Plan

D

DBH diameter at breast height
DTSC California Department of Toxic Substances Control

E

EIR Environmental Impact Report
ESA environmentally sensitive area
ESA federal Endangered Species Act
ELZs equipment limitation zones

F

FC Federal Candidate
FE Federal endangered
FP Fully Protected (CDFW)
FPE Federal proposed endangered
FPT Federal proposed threatened
FRAP Fire and Resource Assessment Program
FT Federal threatened

G

GHG greenhouse gas
GIS Geographic Information Systems

H

HA hydrologic areas
HCP Habitat Conservation Plan

HCRCD	Humboldt County Resource Conservation District
HU	hydrologic unit
I	
IAP	Incident Action Plan
IPaC	Information for Planning and Conservation
L	
LRA	Local Responsibility Area
LTS	less than significant
LTSM	less than significant with mitigation
LTMP	Long-Term Management Plan
M	
MM	mitigation measure
MMRP	mitigation monitoring and reporting program
N	
NA	not applicable
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCUAQMD	North Coast Unified Air Quality Management District
NMFS	National Marine Fisheries Service
NOA	naturally occurring asbestos
NOAA	National Oceanic and Atmospheric Administration
NO _x	nitrogen dioxide
NP9E	nonylphenol 9 Ethoxylates
NPS	National Park Service
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
NWIC	Northwest Information Center
O	
OHP	Office of Historic Preservation
P	
PEIR	Programmatic Environmental Impact Report
PFIRS	Prescribed Fire Information Reporting System
PM	particulate matter
PRC	Public Resources Code
Project	Lower Trinity River Vegetation Treatment Program
PS	potentially significant
PSA	Project Specific Analysis
PSU	potentially significant and unavoidable
R	
RPF	Registered Professional Forester
RWQCB	Regional Water Quality Control Board
S	
SC	State Candidate (for listing)
SE	State Endangered (California)
SENL	single event noise level
SMP	smoke management plan
SPR	standard project requirement

SPRP	Spill Prevention and Response Plan
SR	State Route
SR	State Rare (California)
SRA	State Responsibility Area
ST	State Threatened (California)
SSC	Species of Special Concern
SU	significant and unavoidable
SWRCB	State Water Resources Control Board
T	
TAC	toxic air contaminant
TCRCD	Trinity County Resource Conservation District
TMP	traffic management plan
U	
USACE	United States Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
V	
VMT	vehicle miles traveled
W	
WCFSC	Willow Creek Fire Safe Council
WDR	waste discharge requirement
WLPZ	watercourse and lake protection zone
WRTC	Watershed Research and Training Center
WUI	wildland-urban interface

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Attachment A Standard Project Requirements and Mitigation Measures Checklist

Attachment A – Standard Project Requirements and Mitigation Measures Checklist

Instructions: Review the standard project requirements and mitigation measures and verify that those that are applicable will be implemented. Provide information for each column as follows:

- **Applicable (Yes/No).** Document whether the SPR or mitigation measure is applicable to the initial treatment and/or treatment maintenance (Yes or No), and whether it is applicable to initial treatment and/or treatment maintenance. The applicability should be substantiated in the Environmental Checklist Discussion.
- **Timing.** This column identifies the time frame in which the SPR or mitigation measure will be implemented (e.g., prior to treatment, during treatment).
- **Implementing Entity.** The implementing entity is the agency or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
- **Verifying/Monitoring Entity.** The verifying/monitoring entity is the agency or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during work	CAL FIRE	HCRC and TCRC
SPR AD-2 Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during work	HCRC and TCRC or Contractor	HCRC and TCRC
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during work	HCRC and TCRC	HCRC and TCRC
SPR AD-4 Public Notifications for Prescribed Burning: At least three <u>one</u> days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns. <u>At least three days prior to the commencement of prescribed burning operations, the project proponent will implement other public notifications as appropriate, potentially including any of the</u>	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRC and TCRC	HCRC and TCRC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
following: host public meetings; post notices on local, public bulletin boards; and contact project neighbors via telephone calls. ; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter <u>During this outreach the project proponent will</u> describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.				
SPR AD-5 Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR AD-6 Public Notifications for Treatment Projects: One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD
SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects: For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ► GIS data that include project location (as a point); ► project size (typically acres);	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► treatment types and activities; and ► contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ► A completed PSA Environmental Checklist; ► A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ► GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ► GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ► A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR AES-2 Avoid Staging within Viewsheds: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR AES-3 Provide Vegetation Screening: The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Air Quality Standard Project Requirements				
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	NCUAQMD
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	NCUAQMD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.				
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan <u>for broadcast burns using a template developed by the California State-Certified Burn Boss curriculum development committee, or equivalent that includes elements required to obtain burn permits, and any additional element that are needed to</u> The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. <u>design a burn that will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. This may, but is not required to, include outputs from fire behavior modeling programs.</u> The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y <i>Note. Humboldt County Prescribed Burn Association Template or other plan comparable to the CAL FIRE template may be used instead</i>	Prior to the start of work	Contractor, HCRCD and TCRCD	CAL FIRE
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by CARB, USEPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday; or at a minimum of every 24 hours for continuous treatment activities <u>any time it is visibly being tracked out onto public paved roadways</u>, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may “cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property,” per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	NCUAQMD
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). <u>An Incident Action Plan (IAP) will be prepared that includes elements that are appropriate for the size and scope of the burn as necessary to ensure personnel and public safety. IAP elements may include burn organization and assignments, prescribed fire objectives and prescription, description of the prescribed fire area, expected weather and fire behavior, communications, ignition plan, holding plan, contingency plan and assignments, wildfire declaration, and safety and medical plans. A safety briefing will be conducted with all resources on site for each operational period for all prescribed burning treatments to ensure personnel safety considerations and prescribed fire objectives. The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and</u>	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	CAL FIRE, NCUAQMD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn-related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.				
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. <u>If the project proponent has knowledge of and established relationships with geographically affiliated tribes, they may opt to use their own list in place of the NAHC's list and notify the specific tribes with known affiliation with the project area.</u> The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD
SPR CUL-4 Archaeological Surveys: The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These	Initial Treatment: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment: 1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites).				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: - Require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of <i>A Manual of California Vegetation</i> (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). - Map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, if needed	HCRCD and TCRCD	HCRCD and TCRCD
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: - Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. - Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ► In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval	Initial Treatment: Y Treatment Maintenance: Y	Prior and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: ▶ Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. ▶ The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ▶ For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ▶ Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ▶ A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ► If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle): ► Clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk;	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor	HCRC and TCRC

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Include training on <i>Phytophthora</i> diseases and other plant pathogens in the worker awareness training; ▶ Minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ Minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ Clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ Follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for <i>Phytophthora</i> in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ Clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ For all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ Inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas;	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ Identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ Treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ Implement Fire and Fuel Management Best Management Practices (BMPs) outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g.,	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
CNDDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identify the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ► Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ► Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ► Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if: <u>it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities</u> , if the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours; the National Weather Service forecast is a “chance” (30 percent or more) of rain within the next 24 hours. <u>The project proponent will be prepared to completely suspend mechanical, prescribed herbivory, and herbicide treatment activities prior to the initiation of the rain event.</u> Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or	Initial Treatment: Y Treatment Maintenance: Y	During work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.				
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identify measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Greenhouse Gas Emissions Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the	Initial Treatment: Y	Prior and during work	HCRCD and TCRCD	CAL FIRE/FRAP

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y			
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry <u>one backpack pump-type fire extinguisher filled with water and enough firefighting tools for each worker at each site per chainsaw</u> . Each vehicle would be equipped with the required hand tools for firefighting and one fire extinguisher <u>one long-handled shovel and one axe or Pulaski</u> consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides,	Initial Treatment: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ A map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ A list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the USEPA, DPR, and applicable local jurisdictions. ▶ Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ▶ Low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ▶ Spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; USEPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Hydrology and Water Quality Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ▶ Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ▶ Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements					Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity																				
This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.																												
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes. Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths <table><tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr><tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr></table> WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ <table><tr><td>< 30 % Slope</td><td>75</td><td>50</td><td rowspan="3">Sufficient to prevent the degradation of downstream beneficial uses</td></tr><tr><td>30-50 % Slope</td><td>100</td><td>75</td></tr><tr><td>>50 % Slope</td><td>150</td><td>100</td></tr></table>					Water Class	Class I	Class II	Class III	Class IV	Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.	< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses	30-50 % Slope	100	75	>50 % Slope	150	100	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Water Class	Class I	Class II	Class III	Class IV																								
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.																								
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Standard Project Requirements				Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
			of water. Determined on a site-specific basis.				
Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version) The following WLPZ protections will be applied for all treatments: ▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ Burn piles will be located outside of WLPZs. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs. ▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of							

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control	Initial Treatment: Y Treatment Maintenance: Y	During work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HYD-6 Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and after work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR NOI-3 Engine Shroud Closure: The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor HCRCD and TCRCD	HCRCD and TCRCD
SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses: The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
SPR NOI-5 Restrict Equipment Idle Time: The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul	Initial Treatment: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y			
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Recreation Standard Project Requirements				
SPR REC-1 Notify Recreational Users of Temporary Closures. If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Transportation Standard Project Requirements				
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.				
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity

Air Quality

Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following:	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD
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Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Diesel-powered off-road equipment used in construction will meet USEPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. ▶ Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_x and PM.				
Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or	Initial Treatment: Y Treatment Maintenance: Y	During work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.				
Biological Resources				
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and after work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.				
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ► Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant,	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.				
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work, if needed	HCRCD and TCRCD	HCRCD and TCRCD, CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ► For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. ► Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ► The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
(e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. ► A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.				
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following.	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: ▶ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
treatment activities that could result in mortality, injury or disturbance to special-status species. ▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▶ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▶ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work, and after work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS- approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. Review requirements are as follows: ► The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. ▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.	Initial Treatment: Y Treatment Maintenance: Y	Prior and during work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity				
CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required. Table 3.6-34 Special-status Butterflies and Associated Host Plants <table><tr><th>Butterfly Species</th><th>Host Plants</th></tr><tr><td>bay checkerspot butterfly</td><td>dwarf plantain (<i>Plantago virginica</i>), purple owl's clover (<i>Castilleja exserta</i>)</td></tr></table>	Butterfly Species	Host Plants	bay checkerspot butterfly	dwarf plantain (<i>Plantago virginica</i>), purple owl's clover (<i>Castilleja exserta</i>)				
Butterfly Species	Host Plants							
bay checkerspot butterfly	dwarf plantain (<i>Plantago virginica</i>), purple owl's clover (<i>Castilleja exserta</i>)							

Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Behren's silverspot butterfly	blue violet (<i>Viola adunca</i>)				
callippe silverspot butterfly	California golden violet (<i>Viola pedunculata</i>)				
Carson wandering skipper	salt grass (<i>Distichlis spicata</i>)				
El Segundo blue butterfly	seacliff buckwheat (<i>Eriogonum parvifolium</i>)				
Hermes copper butterfly	spiny redberry (<i>Rhamnus crocea</i>)				
Kern primrose sphinx moth	plains evening-primrose (<i>Camissonia contorta</i>), field primrose (<i>Camissonia campestris</i>)				
Laguna Mountains skipper	Cleveland's horkelia (<i>Horkelia clevelandii</i>), sticky cinquefoil (<i>Drymocallis glandulosa</i>)				
Lange's metalmark butterfly	naked-stemmed buckwheat (<i>Eriogonum nudum</i>)				
lotis blue butterfly	seaside bird's foot trefoil (<i>Hosackia gracilis</i>)				
Mission blue butterfly	lupine (<i>Lupinus</i> spp.)				
Myrtle's silverspot butterfly	blue violet				
Oregon silverspot butterfly	blue violet				
Palos Verdes blue butterfly	Santa Barbara milkvetch (<i>Astragalus trichopodus</i>), common deerweed (<i>Acmispon glaber</i>)				
San Bruno elfin butterfly	broadleaf stonecrop (<i>Sedum spathulifolium</i>), manzanita (<i>Arctostaphylos</i> spp.), huckleberry (<i>Vaccinium</i> spp.)				
Smith's blue butterfly	seacliff buckwheat, seaside buckwheat (<i>Eriogonum latifolium</i>)				
Quino checkerspot butterfly	dwarf plantain, purple owl's clover				
Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during		Initial Treatment: Y Treatment Maintenance: Y	Prior and during work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (<i>Rhaphiomidas terminates abdominalis</i>), Delta green ground beetle (<i>Elaphrus viridis</i>), Morro shoulderband snail, Ohlone tiger beetle (<i>Cicindela ohlone</i>), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species. If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.				
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks	Initial Treatment: Y Treatment Maintenance: Y	Prior and during work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ► Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c. Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.				
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the <i>Manual of California Vegetation</i>, Appendix 2, Table A2, <i>Fire Characteristics</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work, and during work	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g., non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.				
Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work, and after work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.				
Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: ▪ restoring riparian habitat functions and acreage within the treatment area; ▪ restoring degraded riparian habitat outside of the treatment area; ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work, and after work, if needed	HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the	Initial Treatment: Y Treatment Maintenance: Y	Prior to the start of work	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer ▪ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment ▶ Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a	Initial Treatment: Y Treatment Maintenance: Y	During Work, if needed	Contractor, HCRCD and TCRCD	HCRCD and TCRCD

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.				
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the <i>National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire</i> (NWCG 2018): ▶ Reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ Reduce the total area burned through mosaic burning; ▶ Burn when fuels have a higher fuel moisture content; ▶ Reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ Schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Initial Treatment: Y Treatment Maintenance: Y	During work	Contractor	HCRC and TCRC
Hazardous Materials, Public Health and Safety				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Initial Treatment: Y Treatment Maintenance: N	Prior to the start of work	Contractor, HCRCD, TCRCD, CAL FIRE	Contractor, HCRCD, TCRCD, CAL FIRE

Attachment B – Biological Resources Report

Lower Trinity River Vegetation Treatment Program Humboldt and Trinity Counties, California Biological Resources Report



Prepared for: Humboldt County Resource Conservation District
Prepared by: Onterris

August 31, 2026

Table of Contents

1	Existing Biological Resources.....	1
1.1	Inventory Methods	1
1.1.1	Literature and Database Review.....	1
1.2	Vegetation and Habitats	7
1.3	Sensitive Natural Communities	10
1.4	Special-Status Species	12
1.4.1	Plants.....	13
1.4.2	Wildlife.....	26
1.5	Critical Habitat and Essential Fish Habitat	26
2	References.....	35

List of Figures

Figure 1.	Project Location	3
Figure 2.	CNDDDB Records – Plants	4
Figure 3.	CNDDDB Records – Animals.....	5
Figure 4.	USFWS and NMFS Critical Habitat	6
Figure 5.	Soil and Rock Formations Map	8
Figure 6.	Approximate Locations of Erythronium ssp. and Rana boylei Observed in the Field	25

List of Tables

Table 1.	Habitat Types in the Project Area.....	9
Table 2.	Sensitive Natural Communities Documented or with Potential to Occur in the Project Area.....	10
Table 3.	Special-status Plants	14
Table 4.	Special-Status Wildlife Species.....	27

Appendices

Appendix A	Database Queries	38
Appendix B	Site Photographs	39

1 Existing Biological Resources

1.1 Inventory Methods

Baseline biological resources in the project area (**Figure 1**) were evaluated by reviewing pertinent literature and database queries and conducting a field survey to supplement background information with site-specific data. The methods are described below.

1.1.1 Literature and Database Review

Biological resource information in the project area was evaluated by reviewing the following data sources:

- U.S. Fish and Wildlife Service (USFWS), Information for Planning and Conservation (IPaC) list of federally endangered and threatened species (USFWS 2026b);
- USFWS Critical Habitat Portal (USFWS 2026a);
- National Oceanic and Atmospheric Administration (NOAA) Species and Habitat Mapper (NOAA 2026b);
- National Wetland Inventory (NWI) results (USFWS 2026c);
- National Oceanic and Atmospheric Administration (NOAA) West Coast managed species list (NOAA 2026a);
- A query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) for special-status species occurrence records within 5 miles of the project area (CDFW 2026a);
- A query of the CDFW Spotted Owl Observations Database for occurrence records within 5 miles of the project area (CDFW 2026b);
- A query of the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants for special-status plant species records within the 27 USGS 7.5-minute quadrangles surrounding and encompassing the project area: Bald Hills, Blue Lake, Big Bar, Board Camp Mountain, Del Loma, Denny, Grouse Mountain, Hennessy Peak, Hoopa, Hopkins Butte, Hupa Mountain, Hyampom Mountain, Ironside Mountain, Korbel, Jim Jam Ridge, Lord-Ellis Summit, Maple Creek, Panther Creek, Rodgers Peak, Salmon Mountain, Salyer, Sims Mountain, Sportshaven, Tish Tang Point, Trinity Mountain, Weitchpec, and Willow Creek (CNPS 2026);
- California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP) vegetation data (CAL FIRE 2024);
- California Department of Conservation Geologic Map of California (California Department of Conservation 2015);
- iNaturalist observations from the project area vicinity (iNaturalist 2026a);
- eBird records from the project area vicinity (Cornell Lab of Ornithology 2026); and
- Aerial photography (Google Earth 2026).

Results of the IPaC, CNDDDB, and CNPS queries are provided in **Appendix A**. Mapped location of CNDDDB occurrence records within 5 miles of the project area for special-status plant and special-status wildlife are shown in **Figure 2** and **Figure 3**, respectively. Mapped USFWS and NMFS Critical Habitat are shown in **Figure 4**.

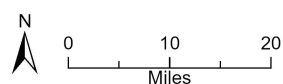
T:\PROJECTS\2005 CoastalConservancy_GeneralSupport\Pro Map Projects\WillowCreek Humboldt RCD Projects\map version.aprx 4/23/2026 PG



Figure 1
Project Location
Lower Trinity River Vegetation
Treatment Program

 Project Boundary

Sources: Sources: Esri, TomTom, Garmin, FAC, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for Environmental Information. Data refreshed October 27, 2025-v2.1



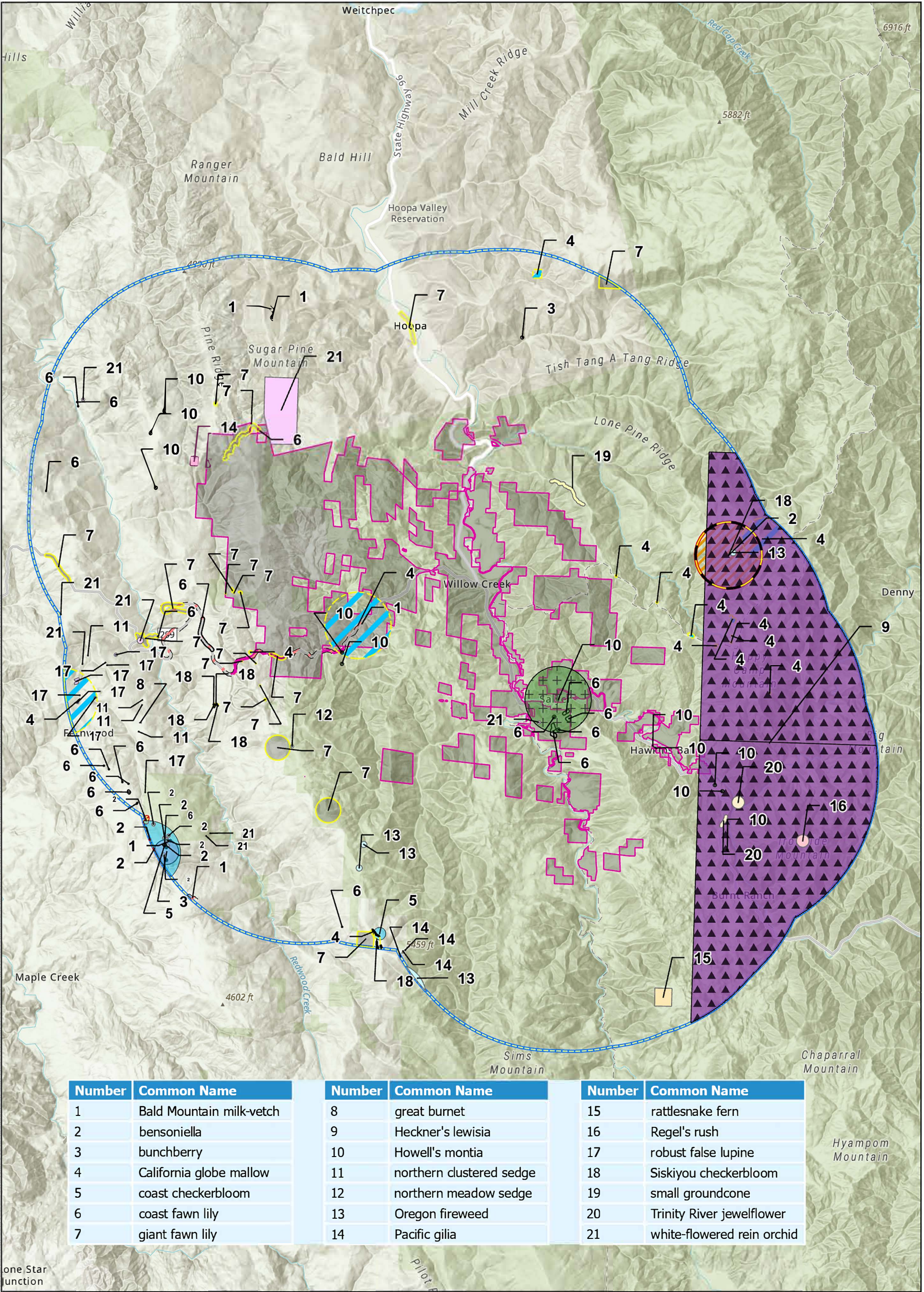


Figure 2
CNDDDB Records - Plants

Lower Trinity River Vegetation Treatment Program

Layer Sources: California Natural Diversity Database (CNDDDB). (2026). CNDDDB occurrence data [GIS dataset]. California Department of Fish and Wildlife, Sacramento, CA. Accessed June 2026

Legend:

- Project Boundary
- Five-Mile Buffer
- Common Name (Plants)
- Bald Mountain milk-vetch
- bensoniella
- bunchberry
- California globe mallow
- coast checkerbloom
- coast fawn lily
- giant fawn lily
- great burnet
- Heckner's lewisia
- Howell's montia
- northern clustered sedge
- northern meadow sedge
- Oregon fireweed
- Pacific gilia
- rattlesnake fern
- Regel's rush
- robust false lupine
- Siskiyou checkerbloom
- small groundcone
- Trinity River jewelflower
- white-flowered rein orchid

Scale: 0 1 2 Miles

Onterris

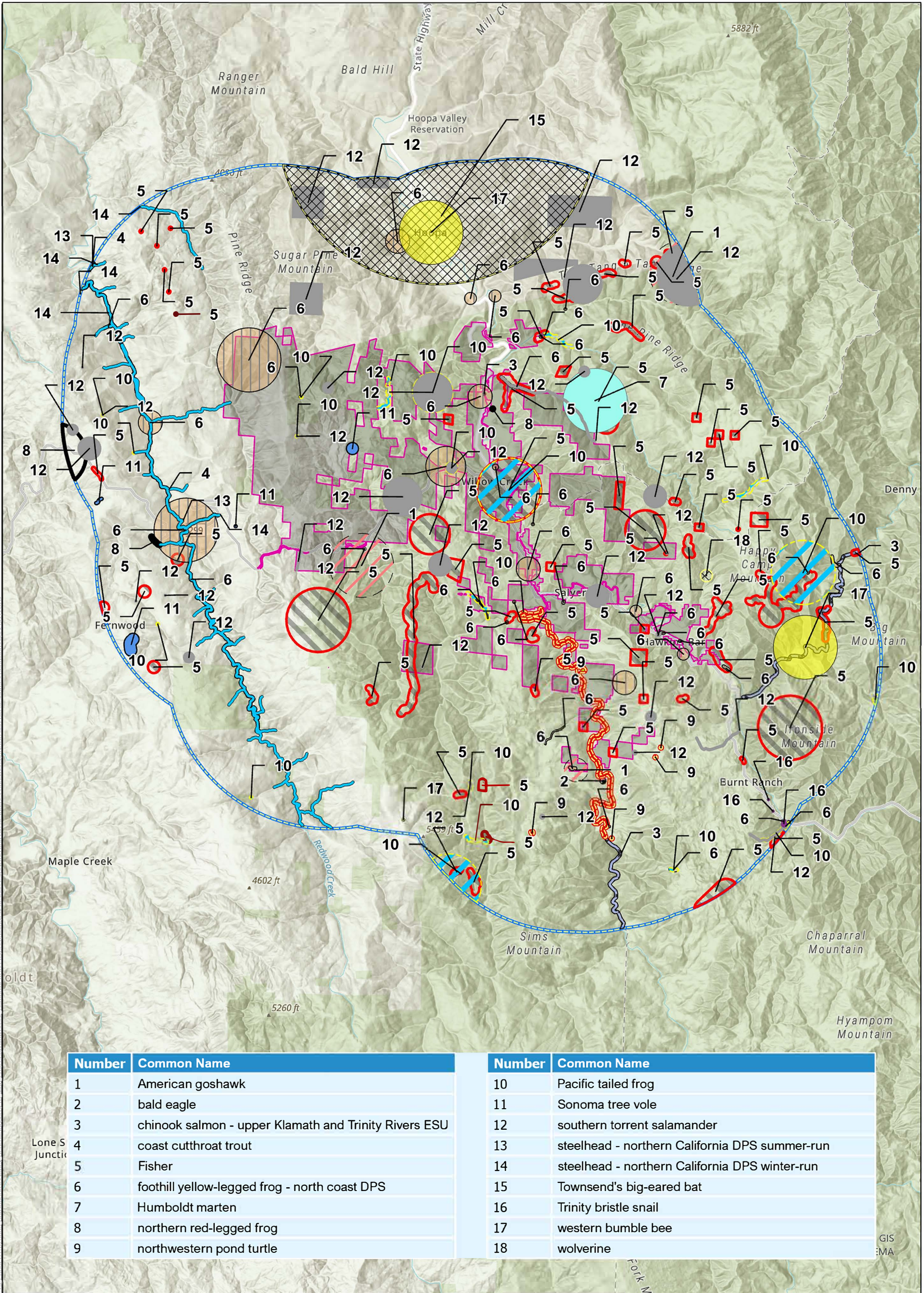


Figure 3
CNDDDB Records - Animals

Lower Trinity River Vegetation Treatment Program

Layer Sources: California Natural Diversity Database (CNDDDB). (2026). CNDDDB occurrence data [GIS dataset]. California Department of Fish and Wildlife, Sacramento, CA. Accessed June 2026
Note: CDFW Spotted Owl Observations are considered sensitive and are not mapped in this figure.

Legend:

- Project Boundary
- Five-Mile Buffer
- Common Name (Animals)
- American goshawk
- bald eagle
- chinook salmon - upper Klamath and Trinity Rivers ESU
- coast cutthroat trout
- Fisher
- foothill yellow-legged frog - north coast DPS
- Humboldt marten
- northern red-legged frog
- northwestern pond turtle
- Pacific tailed frog
- Sonoma tree vole
- southern torrent salamander
- steelhead - northern California DPS summer-run
- steelhead - northern California DPS winter-run
- Townsend's big-eared bat
- Trinity bristle snail
- western bumble bee
- wolverine

Figure 3 Legend:

Number	Common Name
1	American goshawk
2	bald eagle
3	chinook salmon - upper Klamath and Trinity Rivers ESU
4	coast cutthroat trout
5	Fisher
6	foothill yellow-legged frog - north coast DPS
7	Humboldt marten
8	northern red-legged frog
9	northwestern pond turtle
10	Pacific tailed frog
11	Sonoma tree vole
12	southern torrent salamander
13	steelhead - northern California DPS summer-run
14	steelhead - northern California DPS winter-run
15	Townsend's big-eared bat
16	Trinity bristle snail
17	western bumble bee
18	wolverine

Scale: 0 to 3 Miles

Onterris

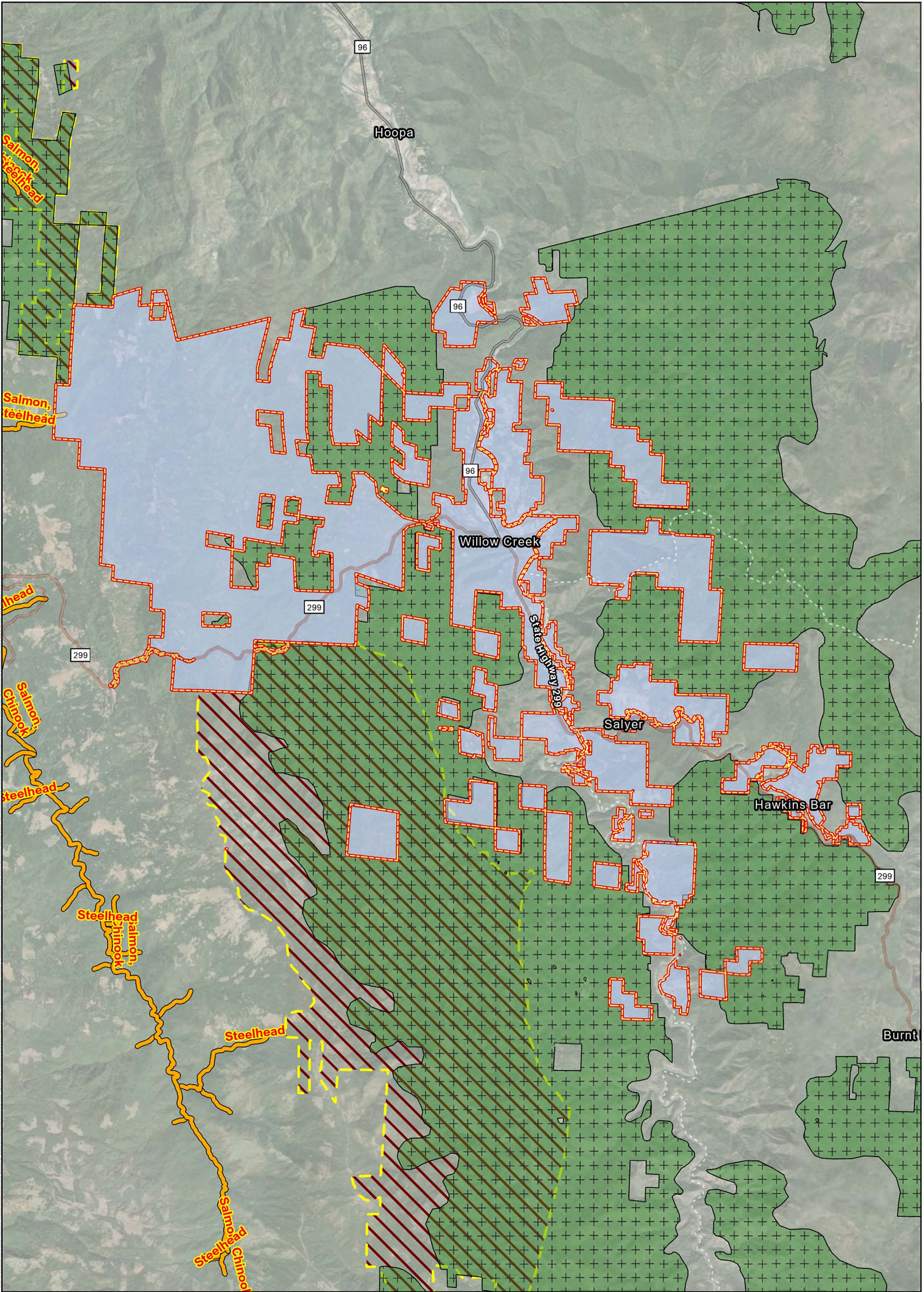
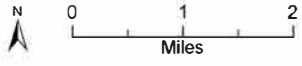


Figure 4
USFWS and NMFS Critical Habitat
Lower Trinity River
Vegetation Treatment
Program

- Project Boundary
- NMFS Critical Habitat (line)
- USFWS Critical Habitat
- Marbled Murrelet
- Northern spotted owl

Layer Sources: U.S. Fish & Wildlife Service. (2026). Geospatial Data Services [Web GIS portal]. U.S. Department of the Interior. Retrieved June 2026, from <LINK><https://www.fws.gov/program/geospatial-data-services>; <LINK> U.S. Fish & Wildlife Service. (2026). Geospatial Data Services [Interactive GIS service]. U.S. Department of the Interior. Accessed 01 June 2026 from <LINK><https://gis-fws.opendata.arcgis.com/></LINK>



Note: The entire project boundary is within the Essential Fish Habitat for Salmonid Species.
<https://www.fisheries.noaa.gov/resource/map/essential-fish-habitat-groundfish-and-salmon>

1.2 Vegetation and Habitats

There are 26 general land cover and habitat types that occur within the project area. Habitat types in the project area were identified using the CAL FIRE FRAP vegetation data (CAL FIRE 2024). CAL FIRE FRAP vegetation data is mapped using the California Wildlife Habitat Relationship (CWHR) habitat types and classifications (Mayer et al. 1988). **Table 1** summarizes the CWHR habitat types/classifications found within the project area and the total acreages of each habitat type. In addition to general land cover and habitat types, serpentine is mapped within the project area (**Figure 5**). Serpentine areas feature unique geological zones where only certain plant species are able to grow due to limiting nutrient concentrations (U.S. Forest Service n.d.).

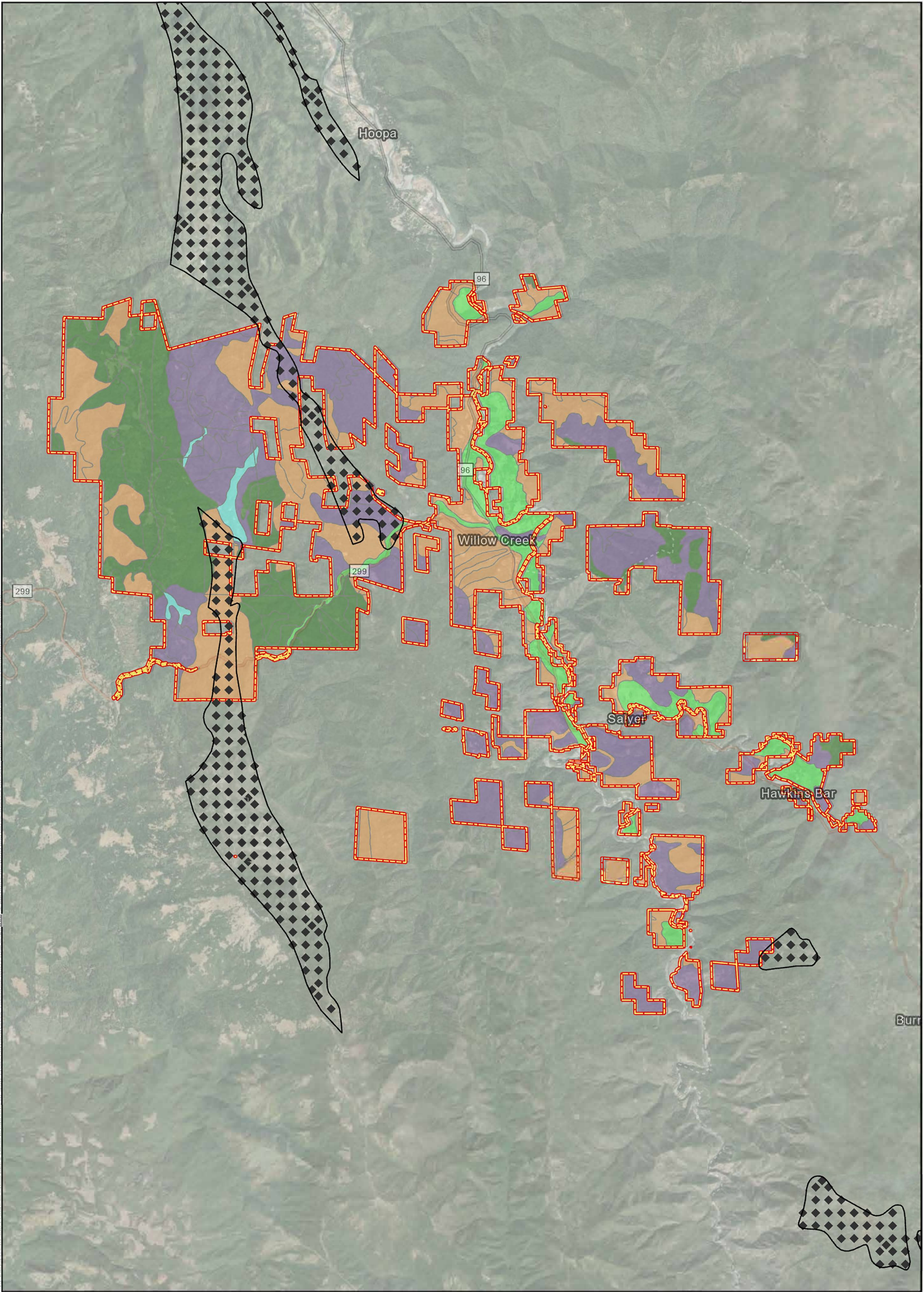


Figure 5
Soil and Rock
Formations Map

Lower Trinity River
Vegetation
Treatment Program

Layer Sources: USA Soils Map, https://landscape11.arcgis.com/arcgis/rest/services/USA_Soils_Map/Units/featureserver; California Dept. of Conservation, Generalized Geologic Map, <https://gis.conservation.ca.gov/server/services>

Project Boundary

Soil Taxon

- Alfisols
- Entisols
- Inceptisols
- Mollisols
- Ultisols

Rock Formations

- Ultramafic rocks, mostly serpentine.
- Minor peridotite, gabbro, and diabase; chiefly Mesozoic.

N

0 1 2
Miles

Onterris

Table 1. Habitat Types in the Project Area

CWHR Habitat Type	Project Area Total Acreage	Ecological Restoration (Acres)	WUI (acres)	Shaded Fuel Break (acres)
Forest/Woodland				
Blue Oak-Foothill Pine	4.0	4.0		
Closed-Cone Pine-Cypress	16.2	16.2		5.1
Coastal Oak Woodland	94.3	81.6	12.7	16.4
Douglas Fir	10531.9	8355.9	2176.1	1885.9
Jeffrey Pine	152.3	152.3		14.8
Klamath Mixed Conifer	225.6	225.6		44.0
Montane Hardwood	11400.1	7638.4	3761.6	2045.5
Montane Hardwood-Conifer	10572.5	8089.3	2483.2	1624.0
Ponderosa Pine	420.5	400.7	19.8	98.4
Forest/Woodland Totals	33417.4	24964.1	8453.4	5734.0
Shrub/Scrub				
Mixed Chaparral	194.4	117.2	77.2	34.5
Montane Chaparral	1139.5	956.1	183.4	143.8
Shrub/Scrub Totals	1333.9	1073.3	260.6	178.3
Herbaceous				
Annual Grassland	1061.8	209.8	852.0	207.8
Perennial Grassland	51.1	10.1	40.9	18.8
Herbaceous Totals	1112.9	219.9	893.0	226.6
Wetland/Riparian				
Lacustrine	11.6		11.6	0.5
Montane Riparian	390.0	219.1	170.9	65.1
Riverine	59.1	4.7	54.4	7.1
Valley Foothill Riparian	2.2	0.2	2.0	0.2
Wet Meadow	12.0	3.6	8.4	
Wetland/Riparian Totals	474.9	227.6	247.3	72.9
Agricultural				
Cropland	131.0		131.0	16.7
Deciduous Orchard	13.8		13.8	3.9
Irrigated Hayfield	170.1	40.0	130.1	28.9
Irrigated Row and Field Crops	9.8		9.8	

CWHR Habitat Type	Project Area Total Acreage	Ecological Restoration (Acres)	WUI (acres)	Shaded Fuel Break (acres)
Pasture	42.5		42.5	5.2
Rice	8.0		8.0	
Agricultural Totals	375.2	40.0	335.1	54.8
Disturbed/Developed				
Barren	145.4	47.9	97.5	10.9
Urban	879.5	22.4	857.1	291.2
Disturbed/Developed Totals	1024.9	70.3	954.6	302.0

Source: CAL FIRE FRAP vegetation data (CAL FIRE 2024); compiled by Onterris 2026.

1.3 Sensitive Natural Communities

Based on the CWHR habitat types identified in the project area (CAL FIRE 2024), habitat types were then identified to the corresponding Manual of California Vegetation (MCV) alliance classifications and state rarity rank (**Table 2**). MCV alliances that may occur within the project area are based on the CWHR habitat type, USDA Ecological Range, and the elevation range of the alliance level (Sawyer et al. 2009; vegetation.cnps.org). Natural communities with a state rarity rank of 1-3 are considered Sensitive Natural Communities by CDFW.

During the biological reconnaissance survey, several potentially sensitive natural communities were identified based on species observations, including California bay forest and woodland, Bigleaf maple forest and woodland, Ponderosa pine-Incense cedar-Douglas fir forest and woodland, Douglas fir - incense cedar forest and woodland, and Hoary, common, and Stanford manzanita chaparral. However, not all portions of the project area were observed during the biological reconnaissance survey, and the survey intensity was not sufficient to classify vegetation communities to the alliance level.

Table 2. Sensitive Natural Communities Documented, or with Potential to Occur in the Project Area

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Closed-cone pine-cypress	Hesperocyparis (sargentii, macnabiana)	Ultramafic cypress woodland	S3
Coastal Oak Woodland	Umbellularia californica	California bay forest and woodland	S3
Douglas Fir; Montane Hardwood - Conifer	Acer macrophyllum	Bigleaf maple forest and woodland	S3
Douglas Fir	Chamaecyparis lawsoniana	Port Orford cedar forest and woodland	S3
Douglas Fir; Ponderosa Pine	Pinus ponderosa - Calocedrus decurrens - Pseudotsuga menziesii	Ponderosa pine - Incense Cedar - Douglas fir forest and woodland	Sensitive¹

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Douglas Fir	Pseudotsuga menziesii - Calocedrus decurrens	Douglas fir - incense cedar forest and woodland	S3
Douglas Fir	Tsuga heterophylla	Western hemlock forest	S2
Jeffrey Pine	Pinus jeffreyi	Jeffrey pine forest and woodland	
Klamath Mixed Conifer	Picea breweriana	Brewer spruce forest and woodland	S2
Mixed chaparral	Arctostaphylos (canescens, manzanita, stanfordiana)	Hoary, common, and Stanford manzanita chaparral	S3
Mixed chaparral	Arctostaphylos glandulosa	Eastwood manzanita chaparral	Sensitive ¹
Mixed chaparral	Ceanothus (oliganthus, tomentosus)	Hairy leaf - woolly leaf ceanothus chaparral	S3
Mixed chaparral	Notholithocarpus densiflorus var. echinoides	Shrub tanoak chaparral	S3
Mixed chaparral	Quercus durata	Leather oak chaparral	S3
Montane Chaparral	Chrysolepis sempervirens	Bush chinquapin chaparral	S3
Montane Chaparral	Quercus sadleriana	Sadler oak or deer oak brush fields	S3
Montane Chaparral	Quercus vacciniifolia	Huckleberry oak chaparral	
Montane Hardwood	Aesculus californica	California buckeye groves	S3
Montane Hardwood	Notholithocarpus densiflorus	Tanoak forest	S3
Montane Hardwood	Quercus garryana (tree)	Oregon white oak woodland and forest	S3
Montane Hardwood	Umbellularia californica	California bay forest and woodland	S3
Montane Riparian	Alnus incana	Mountain alder thicket	S3
Montane Riparian	Fraxinus latifolia	Oregon ash groves	S3
Montane Riparian; Valley Foothill Riparian	Populus fremontii - Fraxinus velutina - Salix gooddingii	Fremont cottonwood forest and woodland	S3
Montane Riparian	Populus trichocarpa	Black cottonwood forest and woodland	S3
Montane Riparian	Salix jepsonii	Jepson willow thickets	S3
Montane Riparian	Alnus rhombifolia	White alder groves	Sensitive ¹
Montane Riparian	Carex nudata	Torrent sedge patches	S3
Montane Riparian; Valley Foothill Riparian	Vitis arizonica - Vitis girdiana	Wild grape shrubland	S3
Perennial Grassland	Alopecurus geniculatus	Water foxtail meadows	S3? ²
Perennial Grassland	Bromus carinatus - Elymus glaucus	California brome - blue wildrye prairie	S3
Perennial Grassland	Carex utriculata - Calamagrostis canadensis	Northwest Territory sedge - Bluejoint Graminoid Wet Meadow & Marsh	S3
Perennial Grassland	Festuca idahoensis - Pseudoroegneria spicata - Poa secunda	Idaho fescue - bluebunch wheat grass - pine bluegrass grassland	S3
Perennial Grassland; Valley Foothill Riparian	Heterotheca (oregona, sessiliflora)	Goldenaster patches	S3
Valley Foothill Riparian	Acer negundo	Box-elder forest and woodland	S3
Valley Foothill Riparian	Carex nudata	Torrent sedge patches	S3

CWHR Classifications	California Sensitive Natural Communities (Scientific Name/Common Name)		Rarity Rank
Valley Foothill Riparian	Frangula californica - Rhododendron occidentale - Salix breweri	California coffeeberry - western azalea scrub - Brewer's willow	S3
Valley Foothill Riparian	Populus trichocarpa	Black cottonwood forest and woodland	S3
Valley Foothill Riparian	Salix gooddingii - Salix laevigata	Goodding's willow - red willow riparian woodland and forest	S3
Wet Meadow	Bromus carinatus - Elymus glaucus	California brome - blue wildrye prairie	S3
Wet Meadow	Carex utriculata - Calamagrostis canadensis	Northwest Territory sedge - Bluejoint Graminoid Wet Meadow & Marsh	S3
Wet Meadow	Darlingtonia californica	California pitcher plant fens	S3
Wet Meadow	Senecio triangularis - Veratrum californicum - Mimulus spp.	Arrowleaf ragwort - white corn lily - monkeyflower mesic meadow	S3S4
Wet Meadow	Triantha occidentalis - Narthecium californicum	Western false asphodel - California bog asphodel fens	S2? ²

¹ The alliance association is considered a sensitive natural community though there is no state rarity rank assigned (CDFW 2025).

² The “?” indicates the best estimate of the rank when there are insufficient samples over the full expected range of the type, but existing information points to this rank.

1.4 Special-Status Species

For the purpose of this report, special-status plant and wildlife species refer to those species that meet one or more of the following criteria:

- Species that are listed as threatened or endangered under the federal Endangered Species Act (ESA) (50 Code of Federal Regulations [CFR] Section 17.12 for listed plants, 50 CFR Section 17.11 for listed animals);
- Species that are candidates for possible future listing as threatened or endangered under ESA (76 Federal Register [FR] Section 66370);
- Species that are listed or candidates for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA) (14 California Code of Regulations [CCR] 670.5);
- Plants listed as rare under the California Native Plant Protection Act of 1977 (Fish and Game Code Section 1900 et seq.);
- California Rare Plant Rank (CRPR) List 1 and 2 species; and
- Animals fully protected in California (Fish and Game Code Sections 3511 [birds], 4700 [mammals], and 5050 [reptiles and amphibians]) or designated as “Species of Special Concern” by CDFW.

Literature and database reviews resulted in a list of 40 special-status plant species and 25 special status wildlife species known to occur in the general region of the project area. These species were assessed for potential to occur within the project area based on the following criteria:

None: the area contains a complete lack of suitable habitat, the local range for the species is restricted, and/or the species is extirpated in this region.

Not Expected: suitable habitat or key habitat elements might be present but might be of poor quality or isolated from the nearest extant occurrences, and/or the species is not known to occur in the area.

Possible: presence of suitable habitat or key habitat elements that potentially support the species, and/or species records indicate extant occurrences are known to occur in the area.

Present: the species was either observed directly or its presence was confirmed by field investigations or in previous studies in the area.

A full list of all special-status species reviewed along with habitat descriptions and an assessment of their potential to occur in the project area is included in **Table 3**.

1.4.1 Plants

Literature and database reviews resulted in a list of 40 special-status plant species known to occur in the region. Of these, 33 were determined to have potential to occur in the project area. The remaining seven species were ruled out based on lack of suitable habitat, suitable substrates, and/or restricted ranges. A full list of special-status plants evaluated including the potential to occur in the project area, along with their blooming periods, associated habitats, and evaluated level of potential to occur, is found in **Table 3** below.

During the biological reconnaissance survey, biologists observed a large population of *Erythronium* species in an open, moist area along the road in Klamath mixed conifer and montane hardwood-conifer habitat. However, biologists were unable to identify to a species level. The approximate location of the *Erythronium* species observation is mapped in **Figure 6**. The biological reconnaissance survey was conducted outside of the blooming period for a variety of special-status species, and the survey did not include full coverage of the entire treatment area.

Treatment activities that have potential to alter the project area, such as burning, mechanical and manual treatments, herbicide use, and prescribed herbivory, may result in direct or indirect adverse effects to special-status plant species. Although treatment activities may indirectly or directly impact special-status plant species through habitat modifications, they may also improve habitat conditions by reducing invasive plant species, restoring the natural fire return interval, clearing debris build-up, and thinning the tree canopy.

Table 3. Special-status Plants

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Arabis rigidissima</i> var. <i>rigidissima</i> Trinity Mountains rockcress	-/-1B.3	perennial herb	Upper montane coniferous forest. Open, rocky places. 4,150–6,810 feet in elevation. Blooms June–August.	None. There are no CNDDDB occurrences within 5 miles of the project area. The project area is outside the known elevation range for this species. Open, rocky areas are lacking in the project area.
<i>Astragalus umbraticus</i> Bald Mountain milk-vetch	-/-2B.2	perennial herb	Cismontane woodland, lower montane coniferous forest. Dry open oak and pine woodlands; sometimes on roadsides. 690–4,000 feet in elevation. Blooms May–August.	Possible. One historic CNDDDB occurrence recorded in 1883 is mapped in the project area along Highway 299. The record indicates the exact location is unknown and it needs more fieldwork (CDFW 2026a). The most recent CNDDDB occurrence from 2016 is mapped approximately 5 miles outside of the project area indicates this species was found in a disturbed site with intercoastal conifer forest (CDFW 2026a). Ponderosa pine, montane-hardwood and montane hardwood-conifer habitats located in the project area are suitable for this species. This species may be found in open areas, especially along roadsides.
<i>Bensoniella oregona</i> <i>bensoniella</i>	-/SR/1B.1	perennial herb	Mesic sites in bogs and fens, Lower montane coniferous forest (openings), Meadows and seeps. 2,955 to 4,595 feet elevation. Blooms May to July.	Possible. Five CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 1990 and is mapped approximately 2.6 miles east of the project area (CDFW 2026a). Habitat for this species is limited in the project area, but present. During the site visit, a few small meadows were observed. A few wet meadows are mapped in the project area via CalFire FRAP data.
<i>Botrypus virginianus</i> rattlesnake fern	-/-2B.2	perennial herb	Bogs and fens, lower montane coniferous forest, meadows and seeps,	Possible. One CNDDDB occurrence from 1992 is mapped approximately 3.75 miles south of the project area. Suitable habitat is present

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			riparian forest. Streambanks. 2,340–4,610 feet in elevation. Blooms June– September.	for this species along numerous streams located throughout the project area.
<i>Buxbaumia viridis</i> green shield-moss	-/-/2B.2	moss	Lower montane coniferous forest, upper montane coniferous forest, subalpine coniferous forest. Well-rotted logs and in peaty soil and humus. 980–7,300 feet in elevation.	Possible. While there are no mapped CNDDDB occurrences within 5 miles of the project area, moist conifer forest likely containing well-rotted logs is present in the project area.
<i>Carex arcta</i> northern clustered sedge	-/-/2B.2	perennial herb	Bogs and fens, North Coast coniferous forest. Mesic sites. 195 to 4,595 feet elevation. Blooms June to September.	Possible. Three CNDDDB occurrences are mapped within 5 miles of the project area. A 2015 occurrence is mapped approximately 2.75 miles west of the project area. The record indicates the plants observed are growing in a pond (CDFW 2026a). Additional CNDDDB occurrences in the area also record this species growing in a pond or wet, marshy area (CDFW 2026a). A few ponds/wet meadows were observed during the site visit and wet meadows are documented by CalFire FRAP data in the project area. It is also possible this species may occur at additional mesic sites such as seeps or along creeks.
<i>Carex praticola</i> northern meadow sedge	-/-/2B.2	perennial herb	Meadows and seeps. Moist to wet meadows. 50–10,500 feet in elevation. Blooms May– July.	Possible. One CNDDDB occurrence from 1982 is mapped approximately 2 miles south of the project area. The record indicates this species was observed in a “springy spot near road under a drain (CDFW 2026a).” A few ponds/wet meadows were observed during

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
				the site visit, and wet meadows are documented by CalFire FRAP data in the project area. Additional seeps that may be present in the project area may provide suitable habitat for this species.
Chaenactis suffrutescens Shasta chaenactis	-/-/1B.3	perennial herb	Lower montane coniferous forest, upper montane coniferous forest. Unstable, sandy to rocky, serpentine soils, scree, drainages. 2,460–9,190 feet in elevation. Blooms May–September.	Possible. Serpentine soil is present in the western portion of the project area (Figure 5; California Department of Conservation 2015). While there are no CNDDDB occurrences within five miles of the project area, suitable habitat is present in open, serpentine habitat on ridgetops as seen in aerial imagery (Google Earth 2026).
Cornus unalaschkensis bunchberry	-/-/ 2B.2	perennial rhizomatous herb	North coast coniferous forest, bogs and fens, meadows and seeps. 290–6,300 feet in elevation. Blooms May–July.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The most recent CNDDDB occurrence from 1992 is mapped approximately 2.4 miles north of the project area. The record indicates this species was observed on the north side of a creek (CDFW 2026a). This species may be present in wet meadows and mesic areas near or along waterways throughout the project area.
Epilobium oreganum Oregon fireweed	-/-/ 1B.2	perennial herb	Bogs and fens, meadows and seeps, lower montane coniferous forest, upper montane coniferous forest. In and near springs and bogs; at least sometimes on serpentine. 1,640–7,350 feet in elevation. Blooms June– September.	Possible. Four CNDDDB occurrences are mapped within 5 miles of the project area. The nearest two CNDDDB occurrences, both from 1979, are mapped approximately 2 and 4 miles south and east of the project area, respectively. The record indicates one occurrence is in conifer forest habitat near a meadow, and the other occurrence is streamside in conifer forest. This species may be present in wet meadows and mesic

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
				areas near or along waterways throughout the project area.
<i>Epilobium siskiyouense</i> Siskiyou fireweed	-/-/ 1B.3	perennial herb	Alpine boulder and rock field, subalpine coniferous forest, upper montane coniferous forest. On slopes in gravelly, serpentine soils. 5,490–8,010 feet in elevation. Blooms July–September.	None. There are no CNDDDB occurrences within 5 miles of the project area, and the project area is outside the known elevation range for this species.
<i>Erigeron maniopotamicus</i> Mad River fleabane daisy	-/-/ 1B.2	perennial herb	Meadows and seeps (open and dry), lower montane coniferous forest. Open slopes, disturbed areas (road cuts); tan-colored, rocky soils. 4,200–4,938 feet elevation.	Not expected. No CNDDDB occurrences within 5 miles of the project area and the project area is located outside the known elevation range for this species. While there are disturbed areas and rocky soils present in the project area, based on the known elevation range of this species, there is low likelihood it will occur.
<i>Erythranthe trinitensis</i> pink-margined monkeyflower	-/-/ 1B.3	annual herb	Lower montane coniferous forest, upper montane coniferous forest, cismontane woodland, meadows and seeps. Often on serpentine and along roadsides. 4,495 - 6,398 feet elevation.	None. The project area is located outside the known elevation range for this species. While serpentine soil is present in the project area (Figure 5; California Department of Conservation 2015), the five CNDDDB occurrences mapped within five miles of the project area are located at elevations above 4,500 feet along a ridgeline approximately 1.5 to two miles south and west of the project area, respectively (CDFW 2026a). Elevations within the project area range from 500 to 4,000 feet. Therefore, suitable habitat is not present within the project area for this species.
<i>Erythronium oregonum</i> giant fawn lily	-/-/ 2B.2	perennial herb	Cismontane woodland, meadows and seeps.	Possible. Three CNDDDB occurrences overlap project area on the western side. During the

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			Openings. Sometimes on serpentine; rocky sites. 950–4,710 feet in elevation. Blooms March–June.	site visit, biologists observed a large population of <i>Erythronium</i> species in an open, moist area along the road in Klamath mixed conifer and montane hardwood-conifer habitat. Biologists were unable to identify to a species level. Suitable habitat is present throughout the project area.
<i>Erythronium revolutum</i> coast fawn lily	-/-/ 2B.2	perennial bulbiferous herb	Bogs and fens, broadleafed upland forest, north coast coniferous forest. Mesic sites; streambanks. 200–4,610 feet in elevation. Blooms March–July.	Possible. Two CNDDDB occurrences overlap project area in the project center and on the western side. During the site visit, biologists observed a large population of <i>Erythronium</i> species in an open, moist area along the road in Klamath mixed conifer and montane hardwood-conifer habitat. Biologists were unable to identify to a species level. Suitable habitat is present in mesic sites and along streambanks in the project area.
<i>Gentiana plurisetosa</i> Klamath gentian	-/-/ 1B.3	perennial herb	Meadows and seeps, upper montane coniferous forest, lower montane coniferous forest. Mesic sites. 3,930– 6,240 feet in elevation. Blooms July–September.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, wet meadows observed during the site visit and mapped by CalFire FRAP data are present in limited areas in the project area. In addition, mesic sites associated with seeps or along waterways in the project area may be suitable for this species.
<i>Gilia capitata</i> ssp. <i>pacifica</i> Pacific gilia	-/-/ 1B.2	annual herb	Coastal bluff scrub, chaparral (openings), coastal prairie, valley and foothill grassland. Steep slopes, ravines, open flats, or coastal bluffs, grassland, dunes.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 2011 and is mapped approximately 0.25 mile west of the project area. The record indicates 150 plants were observed on a south facing cut bank.

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			10–4,410 feet in elevation. Blooms April–August.	
<i>Glyceria grandis</i> American manna grass	-/-/ 2B.3	perennial rhizomatous herb	Bogs and fens, meadows and seeps, marshes and swamps. Wet meadows, ditches, streams, and ponds, in valleys and lower elevations in the mountains. 196-6,709 feet.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, suitable habitat is present in select locations throughout the project area. Wet meadows and ponds observed during the site visit and mapped by CalFire FRAP data are present. In addition, mesic sites associated with seeps or along waterways in the project area may be suitable for this species.
<i>Hemieva ranunculifolia</i> buttercup-leaf hemieva	-/-/ 2B.2	perennial herb	Upper montane coniferous forest, meadows and seeps. Mesic sites; rocky. 5,987-6,807 feet.	None. There are no CNDDDB occurrences within 5 miles of the project area. While there may be suitable mesic sites present in limited areas throughout the project area, the project area is outside the known elevation range of this species.
<i>Hosackia yollabollensis</i> Yolla Bolly Mtns. bird's-foot trefoil	-/-/ 1B.2	perennial herb	Upper montane coniferous forest, meadows and seeps. 5,180-7,004 feet.	None. This species is known to occur in the high north coast ranges on open, dry slopes in fir forest outside of the elevation range of the project area (Brouillet 2012). Additionally, there are no CNDDDB occurrences within 5 miles of the project area.
<i>Iliamna latibracteata</i> California globe mallow	-/-/ 1B.2	perennial herb	North Coast coniferous forest (mesic), chaparral, lower montane coniferous forest, riparian scrub (streambanks). 200–6,560 feet in elevation. Blooms June–August.	Possible. One historic CNDDDB occurrence from 1936 is mapped to the project area, but the exact location is unknown, and the site needs additional fieldwork to confirm if the species is present (CDFW 2026a). Mesic sites associated with seeps or along waterways in the project area may be suitable for this species.

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
<i>Juncus regelii</i> Regel's rush	-/-/ 2B.3	perennial rhizomatous herb	Montane meadows. 2,490–6,235 feet in elevation. Blooms August.	Possible. One CNDDDB occurrence from 1992 is mapped approximately 3.3 miles southeast of the project area. This species is limited to montane meadows; there are a few montane meadows mapped in the project area by CalFire FRAP data that could provide suitable habitat.
<i>Kopsiopsis hookeri</i> small groundcone	-/-/ 2B.3	perennial rhizomatous herb (parasitic)	North coast coniferous forest. Open woods, shrubby places, generally on <i>Gaultheria shallon</i> . 390–4,710 feet in elevation. Blooms April–August.	Possible. One CNDDDB occurrence from 1978 is mapped approximately 0.5 mile northeast of the project area. The record indicates the species was growing on madrone in dense forest litter in mixed evergreen forest (CDFW 2026a). Suitable habitat is present in the project area.
<i>Lewisia cotyledon</i> var. <i>heckneri</i> Heckner's lewisia	-/-/ 1B.2	perennial herb	Lower montane coniferous forest. Rocky places. 740–6,890 feet in elevation. Blooms May–July.	Possible. Two sensitive CNDDDB occurrences are mapped overlapping the project area. The record indicates the species was growing on exposed granitic rock (CDFW 2026a). Rock outcrops are recorded in the project area (NRCS 2026). Though limited, it is possible this species may occur in rocky areas in the project area.
<i>Lupinus elmeri</i> South Fork Mountain lupine	-/-/ 1B.2	perennial herb	Lower montane coniferous forest. Grows in open areas in conifer forest. 4396-5905 feet.	None. There are no CNDDDB occurrences within 5 miles of the project area. While there may be open areas in conifer forest present, the project area is located outside the known elevation range of this species.
<i>Microseris borealis</i> northern microseris	-/-/ 2B.1	perennial herb	Bogs and fens, meadows and seeps, lower montane coniferous forest. Wet meadows, sphagnum bogs. 45-1070 m.	Possible. One CNDDDB occurrence is located just over 5 miles southwest of the project area. The record indicates this species was found in mossy wet places in cold open meadow (CDFW 2026a). This species may be found in limited areas (wet meadows) within the project area.

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
Montia howellii Howell's montia	-/-/ 2B.2	annual herb	Meadows and seeps, north coast coniferous forest, vernal pools. Meadows, North Coast coniferous forest, vernal pools, vernal mesic soils, moist lowland areas. Sometimes on roadsides. 30–3,300 feet in elevation. Blooms March–May.	Possible. Two CNDDDB occurrences overlap in the project area. One CNDDDB occurrence record from 1929 indicates that the species is extirpated due to construction of CA-299. The second CNDDDB occurrence is from 2004 and records more than 20,000 plants behind the Hawkins Bar Store within the project area (CDFW 2026a). Additional CNDDDB occurrences in the area record the species along the road in pullouts and parking areas where soil is compacted and remains wet and puddled into mid-spring (CDFW 2026a). This species may be found throughout the project area along access roads or in mesic sites.
Oenothera wolfii Wolf's evening-primrose	-/-/ 1B.1	perennial herb	Coastal bluff scrub, coastal dunes, coastal prairie, lower montane coniferous forest. Sandy substrates; usually mesic sites. 0–2,630 feet in elevation. Blooms May–October.	Not expected. While there is one historic CNDDDB occurrence from 1949 mapped to the project area, the record indicates the site needs further investigation as it is far inland for this species to occur and may be erroneous (CDFW 2026a).
Packera bolanderi var. bolanderi seacoast ragwort	-/-/ 2B.2	perennial rhizomatous herb	Coastal scrub, north coast coniferous forest. Sometimes along roadsides. 98–3,001 feet.	Not expected. There are no CNDDDB occurrences within 5 miles of the project area. This species is generally known to occur along the coast (Trock 2012).
Phacelia leonis Siskiyou phacelia	-/-/ 1B.3	annual herb	Upper montane coniferous forest, meadows and seeps. Sandy flats, slopes, sometimes on serpentine. 3,930–6,560 feet in elevation. Blooms June–August.	Not expected. The majority of the project area is outside the known elevation range of this species. No CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is mapped over 5 miles east of the project area and records indicate this species was observed in

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
				sandy, moist soil by a stream in the open at 6,400 feet elevation (CDFW 2026a). This species may be located in higher elevations in the project area in serpentine areas in the western portion of the project area (California Department of Conservation 2015).
<i>Piperia candida</i> white-flowered rein orchid	-/-/ 1B.2	perennial herb	North Coast coniferous forest, lower montane coniferous forest, broadleaved upland forest. Open to shady sites. Sometimes on serpentine. 150–5,300 feet in elevation. Blooms May–September.	Possible. One CNDDDB occurrence from 2005 overlaps the southern portion of the project area. The record indicates the species was observed on a gentle slope with a slight northern aspect; the ground was littered with tanoak leaves and small woody debris. Suitable habitat is present for this species throughout the project area.
<i>Ramalina thrausta</i> angel's hair lichen	-/-/ 2B.1	fruticose lichen (epiphytic)	North coast coniferous forest. On dead twigs and other lichens. 246-4560 feet.	Possible. One CNDDDB occurrence from 1972 was mapped approximately 1.9 miles south of the project area. Suitable habitat is present for this species throughout the project area.
<i>Rosa gymnocarpa</i> var. <i>serpentina</i> Gasquet rose	-/-/ 1B.3	perennial rhizomatous shrub	Chaparral, cismontane woodland. Serpentinite. Often on roadsides, sometime on ridges, streambanks, and in openings. 1,190–7,320 feet in elevation. Blooms April–June.	Possible. Serpentine soil is present in the western portion of the project area (Figure 5; California Department of Conservation 2015). While there are no CNDDDB occurrences within five miles of the project area, suitable habitat is present in open, serpentine habitat on ridgetops or along roadsides as seen in aerial imagery (Google Earth 2026).
<i>Sanguisorba officinalis</i> great burnet	-/-/ 2B.2	perennial rhizomatous herb	Bogs and fens, meadows and seeps, broadleaved upland forest, marshes and swamps, north coast coniferous forest, riparian forest. Rocky serpentine	Possible. There is one CNDDDB occurrence from 2012 mapped approximately four miles southwest of the project area. Serpentine soil is mapped in the project area (Figure 5; California Department of Conservation 2015) and based on EPA Waters data (EPA 2025),

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
			seepage areas and along streams. 16 – 4593 feet elevation.	waterways intersect serpentine areas within the project area. Therefore, suitable habitat for this species is present in the project area.
Schoenoplectus subterminalis water bulrush	-/-/ 2B.3	perennial rhizomatous herb (aquatic)	Montane lake margins, in shallow water. Streams low in nutrients. 2,460–7,380 feet in elevation. Blooms June–August.	Possible. While there are no CNDDDB occurrences within 5 miles of the project area, suitable stream habitat is present.
Sedum divergens Cascade stonecrop	-/-/ 2B.3	perennial herb	Rocky alpine slopes and cool cliffs. 5,000–7,660 feet in elevation. Blooms July–September.	None. Suitable habitat is not present in the project area, and the project area is located outside the known elevation range for this species.
Sidalcea malviflora ssp. patula Siskiyou checkerbloom	-/-/ 1B.2	perennial rhizomatous herb	Coastal bluff scrub, coastal prairie, north coast coniferous forest. Open coastal forest; roadcuts. 16-4117 feet.	Possible. Three CNDDDB occurrences are mapped within 5 miles of the project area. The nearest CNDDDB occurrence is from 2019 and is mapped approximately 1.9 miles southwest of the project area. Suitable habitat is present throughout the project area.
Sidalcea oregana ssp. eximia coast checkerbloom	-/-/ 1B.2	perennial herb	Meadows and seeps, north coast coniferous forest, lower montane coniferous forest. Near or in meadows, in gravelly soil. 10–5,920 feet in elevation. Blooms June– August.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. A 2007 CNDDDB occurrence is mapped approximately 4.5 miles south of the project area. The record indicates the species was observed along margins of a spring-fed pond (CDFW 2026a). Suitable habitat is limited in the project area based on site visit observations and mapped CalFire FRAP vegetation data.
Streptanthus oblanceolatus Trinity River jewelflower	-/-/ 1B.2	perennial herb	Cismontane woodland. Cliffs, canyon walls in conifer forest. 65-1377 feet.	Possible. Two CNDDDB occurrences are mapped within 5 miles of the project area. The most recent CNDDDB occurrence is from 2009 and is mapped approximately 1.4 miles

Scientific Name/ Common Name	Listing status* (Federal/ State/CNPS)	Life Form	Habitat Association	Potential to Occur in the Project Area
				south of the project area. The record indicates the species was observed on a steep bluff along CA-299. This species may be present along steep slopes in the project area including along the Trinity River, CA-299, CA-96, and other roadways.
Thermopsis robusta robust false lupine	-/- 1B.2	perennial rhizomatous herb	North Coast coniferous forest, broadleafed upland forest. Ridgetops; sometimes on serpentine. 1,200–4,610 feet in elevation. Blooms May–July.	Possible. Six CNDDDB occurrences are mapped within 5 miles of the project area. The nearest occurrence is from 2019 and is mapped approximately four miles west of the project area. Suitable habitat may be present on ridgetops throughout the project area.

* List of Abbreviations for Species Status follow below:

SR = State Rare (California)

CA Rare Plant Rank

1B.1 = Plants rare, threatened, or endangered in California and elsewhere; seriously threatened in California

1B.2 = Plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California

1B.3 = Plants rare, threatened, or endangered in California and elsewhere; not very threatened in California

2B.1 = Plants rare, threatened, or endangered in California, but more common elsewhere; seriously threatened in California
2B.2 = Plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California

2B.3 = Plants rare, threatened, or endangered in California, but more common elsewhere; not very threatened in California

Source: California Department of Fish and Wildlife (CDFW). 2026. California Natural Diversity Database.

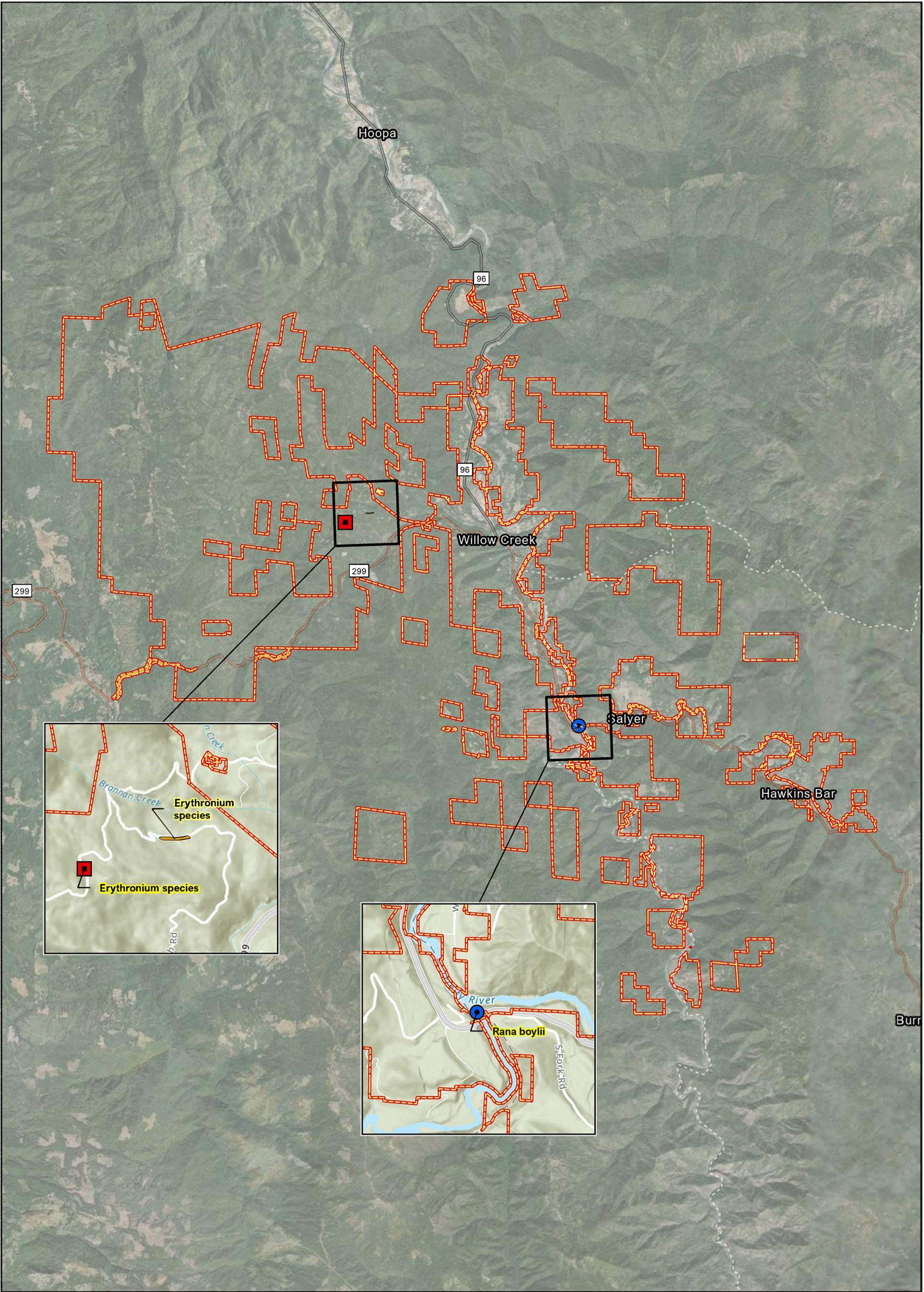


Figure 6
Approximate Locations of *Erythronium* ssp. and *Rana boylii*

Lower Trinity River
Vegetation Treatment
Program

Project Boundary

Field Observations (Points)

- Erythronium species
- Rana boylii

Field Observations (Polygon)

- Erythronium species

0 1 2
Miles

Onterris

1.4.2 Wildlife

Literature and database reviews identified 25 special-status wildlife species known to occur in the region. Of these, 21 were determined to have the potential to occur within the project area.

Individuals presumed to be foothill yellow-legged frogs were observed in the South Fork Trinity River approximately 50 feet outside of the project area during the reconnaissance-level survey in April 2026. Foothill yellow-legged frog occurrences are mapped to the South Fork Trinity River (CDFW 2026a). **Table 4** lists the 25 special-status wildlife species known to occur in the region, along with their associated habitats, and evaluated potential to occur within the project area.

Suitable habitat for many of the special-status species listed in Table 4 is present within the project area, and these species may occur year-round, seasonally, or as transients. In addition, nesting birds protected under the Migratory Bird Treaty Act and Fish and Game Code are likely to be present during the avian nesting season (typically March 1 through August 31). Birds may nest in trees, shrubs, structures, and on the ground throughout all habitat types, including developed areas.

Treatment activities have the potential to result in direct and indirect adverse effects on special-status wildlife species and their habitats. However, implementation of the proposed treatments is expected to improve overall habitat quality, ecological function, and ecosystem health over the long term.

1.5 Critical Habitat and Essential Fish Habitat

While the project area does not overlap with designated critical habitat for marbled murrelet and northern spotted owl, portions of the project area are directly adjacent to designated critical habitat for marbled murrelet and northern spotted owl. In addition, Redwood Creek is designated critical habitat for chinook salmon and steelhead (USFWS 2026a), and Essential Fish Habitat (EFH) for chinook and coho salmon is mapped within the project area (NOAA 2026b). Mapped critical habitat and EFH within and adjacent to the project area are shown in **Figure 4**.

Table 4. Special-Status Wildlife Species

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
Amphibians			
Ascapus truei Pacific tailed frog	-/SSC	Occurs in montane hardwood-conifer, redwood, Douglas-fir & ponderosa pine habitats. Restricted to perennial montane streams. Tadpoles require water below 15 degrees C.	Possible. Four CNDDDB occurrences from 1984, 1985 and 2006 overlap the project area. The most recent CNDDDB occurrence from 2006 is mapped to the general area of the town of Willow Creek. The record indicates one individual was photographed in the vicinity. Multiple perennial montane streams such as Supply Creek, Three Creek, Fourmile Creek and Campbell Creek are present in the project area and provide suitable habitat for this species (CDFW 2026a; EPA 2026).
Rana aurora northern red-legged frog	-/SSC	Humid forests, woodlands, grasslands, & streamsidess in northwestern California, usually near dense riparian cover. Generally near permanent water, but can be found far from water, in damp woods and meadows, during non-breeding season.	Possible. One CNDDDB occurrence from 2016 is mapped to the project area on the east side of the Trinity River. The record indicates one adult was observed in 2016 (CDFW 2026a). The Trinity and South Fork Trinity Rivers, as well as tributaries and perennial streams throughout the project area provide suitable habitat for this species.
Rana boylii pop. 1 foothill yellow- legged frog - north coast DPS	-/SSC	Partly-shaded, shallow streams & riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	Present. Over 10 CNDDDB occurrences for foothill yellow-legged frog overlap the project area. Suitable breeding habitat for this species is located in the Trinity and South Fork Trinity River and its tributaries, as well as Redwood Creek and associated tributaries. CNDDDB records are mapped to the Trinity and South Fork Trinity rivers as well as Ammon Creek, Madden Creek and Fourmile Creek (CDFW 2026a). Foothill yellow-legged frog may also use intermittent and ephemeral creeks/drainages in the project area to disperse and overwinter. During the biological reconnaissance survey, what appeared to be foothill yellow-legged frogs were observed in the South Fork Trinity River 50 feet outside of the project area (Figure 6).
Rhyacotriton variegatus	-/SSC	Coastal redwood, Douglas-fir, mixed conifer, montane riparian, and montane	Possible. Over 10 CNDDDB occurrences for southern torrent salamander are mapped overlapping the project

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
southern torrent salamander		hardwood-conifer habitats. Old growth forest. Cold, well-shaded, permanent streams and seepages, or within splash zone or on moss-covered rock within trickling water.	area. Perennial creeks within the project area provide suitable habitat for this species. CNDDDB occurrences in the project area are mapped to Boise Creek, Cedar Creek, Coon Creek drainage and a roadside seep (CDFW 2026a). A few CNDDDB occurrences are also mapped in the vicinity of the Trinity River (CDFW 2026a).
Birds			
Astur atricapillus American goshawk	-/SSC	Within, and in vicinity of, coniferous forest. Uses old nests and maintains alternate sites. Usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees.	Possible. Two historic CNDDDB occurrences from 1979 and 1983 were mapped overlapping the project area. The 1979 occurrence indicates the nest is no longer active, however, the 1983 occurrence indicates the nest is located in an unsurveyed area (CDFW 2026a). Suitable nesting habitat is located throughout the project area, particularly in dense forest habitat in the southern, southwestern, and northwestern portion of the project area.
Brachyramphus marmoratus Marbled murrelet	FT/-	Feeds near-shore; nests inland along coast from Eureka to Oregon border & from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas-fir.	Possible. Although there are no CNDDDB occurrences recorded within 5 miles of the project area (CDFW 2026a), western portions of the project area are directly adjacent to USFWS final critical habitat for marbled murrelet. In California, marbled murrelet is generally known to nest within 25 miles of the coast (USFWS 2016). Portions of the project area west of CA-299 may be within the known nesting radius for marbled murrelet.
Charadrius nivosus nivosus Western snowy plover	FT/-	Sandy beaches, salt pond levees & shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	None. No suitable habitat is present in the project area.
Coccyzus americanus Yellow-billed cuckoo	FT/-	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, w/ lower story of blackberry, nettles, or wild grape.	None. There are no CNDDDB occurrences within 5 miles of the project area (CDFW 2026a). This species is only known to nest in three locations in California, the Sacramento and Kern Rivers and the California side of the lower Colorado River. Suitable riparian habitat dominated by willows is not present in the project area. Historically,

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
			yellow-billed cuckoo was more common in the San Joaquin Valley region (USFWS 2019).
Gymnogyps californianus California condor	FE/SE	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. forages up to 100 miles from roost/nest.	None. Suitable nesting and foraging habitat are not present for this species in the project area.
Haliaeetus leucocephalus bald eagle	-/SE	Ocean shore, lake margins, & rivers for both nesting & wintering. Most nests within 1 mi of water. Nests in large, old-growth, or dominant live tree w/open branches, especially ponderosa pine. Roosts communally in winter.	Present. Although there is only 1 CNDDDB occurrence from 1997 for bald eagle mapped approximately 0.35 miles south of the project area, there are numerous iNaturalist records of bald eagle nests along the Trinity and South Fork Trinity River (iNaturalist 2026b). In addition, there are CDFW Bald Eagle Observations (CDFW 2019) mapped along the Trinity and South Fork Trinity River. The Trinity River and South Fork Trinity River provide suitable foraging habitat for this species and nests may occur within 1 mile of the river. Although there are potentially fish-bearing perennial streams in the project area, bald eagles prefer open water to forage. Nest sites are generally chosen with a clear view of water where they forage (USFWS 2007). Considering the denser tree canopy cover of tributaries and additional perennial streams in the project area, there is high likelihood bald eagle nests will be concentrated within 1 mile of the Trinity and South Fork Trinity Rivers.
Strix occidentalis caurina Northern spotted owl	FT/-	Old growth forests or mixed stands of old-growth and mature trees. Occasionally in younger forests with patches of large trees. High, multistory canopy dominated by large trees, many trees with cavities or	Possible. Portions of the project area are directly adjacent to USFWS final critical habitat for this species. There are a total of 3,944 positive and activity center (a location or point representing 'the best of' detections such as nest stands, stands used by roosting pairs or territorial singles, or concentrated nighttime detections) CDFW observations within 5 miles of the project area

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
		broken tops, woody debris, and space under canopy.	(CDFW 2026b). Some of these observations overlap the project area. Of these observations, 637 are recorded nests. Suitable foraging, roosting, and breeding habitat is present in most of the project area.
Fish			
Oncorhynchus clarkii coast cutthroat trout	/SSC	Small coastal streams from the Eel River to the Oregon border. Small, low gradient coastal streams & estuaries. Need shaded streams with water temps <18C, & small gravel for spawning.	Possible. One CNDDDB occurrence from 1995 is mapped approximately 1.4 miles west of the project area. The occurrence is mapped to Redwood Creek and its tributaries (CDFW 2026a). Minor Creek, a tributary of Redwood Creek, overlaps the northwestern portion of the project area (Environmental Protection Agency 2025). Tributaries along the Trinity River may also provide suitable habitat for this species, although this species is more likely to be found in lower reaches closer to the coast and may not occur as far south as the South Fork Trinity River.
Oncorhynchus mykiss irideus pop. 48 steelhead - northern California DPS summer-run	FT/SE	Naturally spawning population of the stream-maturing summer-run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution within range more limited. Require cool water (<23C); holding habitat to withstand higher temps; lower flows in summer/fall; require loose gravels at pool tails for redd construction. Favor cool, clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	Possible. One CNDDDB occurrence from 2019 is mapped to Redwood Creek, approximately 2.5 miles west of the project area. Minor Creek, a perennial tributary of Redwood Creek, overlaps the northwest portion of the project area and may provide suitable habitat for this species.
Oncorhynchus mykiss irideus pop. 49	FT/-	Naturally spawning population of the ocean-maturing winter-run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution throughout range. Adults	Possible. One CNDDDB occurrence from 2011 is mapped to Redwood Creek and its tributaries, including Minor Creek, which overlaps the northwestern portion of the project area (CDFW 2026a). Suitable habitat is present in the project area for this species.

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
steelhead - northern California DPS winter-run		require high flows of 18-20 cm for passage and loose gravels at pool tails. Juveniles favor areas with cool (10-17 C), clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse prey.	
Oncorhynchus tshawytscha pop. 30 chinook salmon - upper Klamath and Trinity Rivers ESU	FC/ST	Spring-run chinook in the Trinity River and the Klamath River upstream of the mouth of the Trinity River. Major limiting factor for juvenile chinook salmon is temperature, which strongly effects growth and survival.	Possible. One CNDDDB occurrence from 1999 is mapped to the Trinity River at the center of the project area. The record indicates that based on the timing, the fish observed include both spring and fall run fish (CDFW 2026a).
Insects			
Bombus occidentalis western bumble bee	-/SC	Once common throughout much of its range, in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Possible. While no CNDDDB occurrence overlaps the project area, there are three CNDDDB occurrences from 1968, 1969 and 2013, mapped within 5 miles of the project area (CDFW 2026a). The 2013 occurrence is mapped approximately 4.5 miles south of the project area, on the west side of Six Rivers National Forest (CDFW 2026a). This species is known to nest in a variety of habitats though overwintering sites are not well understood (Xerces Society 2023). Western bumble bee may occur throughout the project area due to the presence of suitable habitat
Bombus suckleyi Suckley's Cuckoo bumble bee	FPE-	Pacific coast from Alaska to far northern California, east to Nebraska. In California, this species has a very limited distribution, occurring only in the Klamath Mountain region in the northern part of the state. An inquiline in the colonies of other bumblebees. Adult food plant genera include Aster, Centaurea,	Possible. The project area occurs in the Klamath Mountain region where this species is known to occur. This species is also dependent on host colonies for survival and is known to take over western bumble bee colonies (USFWS 2024). Considering it is possible for western bumble bee to occur, it is likely this species may occur as well.

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
		Cirsium, Trifolium, Chrysothamnus, Helichrysum.	
Danaus Plexippus Monarch butterfly	FPT/-	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Possible/None (Roosting). The project area is not within the overwintering range for this species (NatureServe and Xerces Society 2015). However, this species feeds and breeds on a variety of milkweed plants which may be present in open woodland and grassland habitat throughout the project area.
Mammals			
Arborimus pomo Sonoma tree vole	-/SSC	North coast fog belt from Oregon border to Sonoma Co. In Douglas-fir, redwood & montane hardwood-conifer forests. Feeds almost exclusively on Douglas-fir needles. Will occasionally take needles of grand fir, hemlock or spruce.	Possible. One CNDDDB occurrence from 1994 overlaps the western portion of the project area. The CNDDDB record indicates one nest site was observed (CDFW 2026a). Suitable habitat within Douglas fir and montane hardwood-conifer is dominant throughout the project area.
Corynorhinus townsendii Townsend's big-eared bat	-/SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls & ceilings. Roosting sites limiting. extremely sensitive to human disturbance.	Not expected. One CNDDDB occurrence from 1951 is mapped within 5 miles of the project area. This species prefers open roosting areas and are not known to roost in cracks and crevices (National Park Service 2020). Roosting habitat includes abandoned structures, mines, and caves.
Gulo gulo luscus North American wolverine	FT/-	Found in the north coast mountains and the Sierra Nevada. Found in a wide variety of high elevation habitats. Needs water source. uses caves, logs, burrows for cover & den area. Hunts in more open areas. Can travel long distances	Not expected. One CNDDDB occurrence from 1966 is mapped approximately one mile east of the project area (CDFW 2026a). In 2023, a sighting of a wolverine was confirmed in the Eastern Sierra Nevada Mountains in the Inyo National Forest and Yosemite National Park (CDFW 2023). In the last 100 years, only two wolverines have been observed in California (CDFW 2023). While there is suitable habitat in the project area, there is low potential for this species to occur.
Martes caurina humboldtensis	FT/-	North coast coniferous forest, Old growth, Subalpine coniferous forest and Upper montane coniferous forest. Occurs	None. There is one historical CNDDDB occurrence from 1972 overlapping the northeast portion of the project area. The CNDDDB occurrence records an observation in

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
Pacific marten Coastal DPS (Humboldt marten)		only in the coastal redwood zone from the Oregon border south to Sonoma County. Associated with late-successional coniferous forests, prefer forests with low, overhead cover. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest. Needs variety of different-aged stands, particularly old-growth conifers and snags which provide cavities for dens/nests.	Douglas-fir habitat. (CDFW 2026a). However, this CNDDDB occurrence is now located out of the known extant range of this species. While the project area is within this species known historical range, the project area is not located within the current known range of the extant population (USFWS 2025).
Pekania pennanti Fisher	-/SSC	Intermediate to large-tree stages of coniferous forests & deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs & rocky areas for cover & denning. Needs large areas of mature, dense forest.	Possible. There are 59 CNDDDB occurrences mapped within 5 miles of the project area, with numerous occurrences overlapping the project area (CDFW 2026a). A majority of the project area is located in suitable habitat for this species and includes denning habitat.
Mollusks			
Monadenia infumata setosa Trinity bristle snail	-/ST	Known only from along a few streams in the Trinity River drainage. Juveniles are found under bark of standing dead broadleaf trees, and the species may require this habitat.	Possible. While this species was initially thought to have very limited range along the Trinity River, recent research indicates Trinity bristle snail's range extends farther than initially recorded (CDFW 2005). Three CNDDDB occurrences from 2015 are mapped approximately 4 to 4.5 miles southeast and south of the project area. The occurrences are mapped along the Trinity River; Trinity bristle snails were relocated to the southernmost record due to roadwork impacts (CDFW 2026a).
Reptiles			
Actinemys marmorata northwestern pond turtle	FPT/SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams & irrigation ditches with aquatic vegetation below 6000 ft elevation. Need basking sites and suitable (sandy banks or grassy open	Possible. Northwestern pond turtle is known to occur in the South Fork of the Trinity River, which intersects the project area. A 2006 CNDDDB occurrence records 1 to 20 adults and juveniles found at 31 sites between 2005 and 2006 (CDFW 2026a). Additional CNDDDB occurrences in

Scientific Name/ Common Name	Listing status* (Federal/ State)	Habitat Association	Potential to Occur in the Project Area
		fields) upland habitat up to 0.5 km from water for egg-laying.	proximity to the project area are mapped to Big Lake and unnamed ponds within approximately 2 miles of the South Fork of the Trinity River (CDFW 2026a). Suitable habitat for northwestern pond turtle exists in the project area within the Trinity River, South Fork Trinity River, and nearby ponds and tributaries of the Trinity River; habitat here consists of open banks and basking structures.
* Abbreviations for Federal and State Species Status: FE = Federal endangered FT = Federal threatened FC = Federal candidate FPT = Federal proposed threatened FPE = Federal proposed endangered Source: CDFW 2026.		SE = State endangered ST = State threatened SC = State candidate SSC = Species of special concern (CDFW) FP = Fully protected (CDFW)	

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Appendix A Database Queries



California Natural Diversity Database Occurrences Within Five Miles

Listed in order of scientific name

ScientificName	CommonName	FESA	CESA	CRPR	CDFW Status	OtherStatus
<i>Actinemys marmorata</i>	northwestern pond turtle	Proposed Threatened	None		SSC	BLM_S; IUCN_VU; USFS_S
<i>Arborimus pomo</i>	Sonoma tree vole	None	None		SSC	IUCN_NT
<i>Ascaphus truei</i>	Pacific tailed frog	None	None		SSC	IUCN_LC
<i>Astragalus umbraticus</i>	Bald Mountain milk-vetch	None	None	2B.2		
<i>Astur atricapillus</i>	American goshawk	None	None		SSC	BLM_S; CDF_S; USFS_S
<i>Bensoniella oregona</i>	bensoniella	None	Rare	1B.1		SB_UCSC; USFS_S
<i>Bombus occidentalis</i>	western bumble bee	None	Candidate Endangered			IUCN_VU; USFS_S
<i>Botrypus virginianus</i>	rattlesnake fern	None	None	2B.2		
<i>Carex arcta</i>	northern clustered sedge	None	None	2B.2		IUCN_LC
<i>Carex praticola</i>	northern meadow sedge	None	None	2B.2		
<i>Cornus unalaschensis</i>	bunchberry	None	None	2B.2		
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None	None		SSC	BLM_S; IUCN_LC; USFS_S
<i>Epilobium oreganum</i>	Oregon fireweed	None	None	1B.2		BLM_S; SB_CalBG/RSABG; USFS_S
<i>Erythranthe trinitensis</i>	pink-margined monkeyflower	None	None	1B.3		SB_CalBG/RSABG
<i>Erythronium oregonum</i>	giant fawn lily	None	None	2B.2		SB_UCSC
<i>Erythronium revolutum</i>	coast fawn lily	None	None	2B.2		SB_UCSC

<i>Gilia capitata</i> ssp. <i>pacifica</i>	Pacific gilia	None	None	1B.2		BLM_S; SB_CalBG/RSABG
<i>Gulo gulo</i>	wolverine	Threatened	Threatened		FP	IUCN_LC; USFS_S
<i>Haliaeetus leucocephalus</i>	bald eagle	Delisted	Endangered		FP	BLM_S; CDF_S; IUCN_LC; USFS_S
<i>Iliamna latibracteata</i>	California globe mallow	None	None	1B.2		SB_CalBG/RSABG; USFS_S
<i>Juncus regelii</i>	Regel's rush	None	None	2B.3		
<i>Kopsiopsis hookeri</i>	small groundcone	None	None	2B.3		
<i>Lewisia cotyledon</i> var. <i>heckneri</i>	Heckner's lewisia	None	None	1B.2		BLM_S; SB_UCSC
<i>Martes caurina humboldtensis</i>	Humboldt marten	Threatened	Endangered		SSC	USFS_S
<i>Microseris borealis</i>	northern microseris	None	None	2B.1		IUCN_LC
<i>Monadenia infumata setosa</i>	Trinity bristle snail	None	Threatened			IUCN_VU
<i>Montia howellii</i>	Howell's montia	None	None	2B.2		
<i>Oenothera wolfii</i>	Wolf's evening-primrose	None	None	1B.1		BLM_S; SB_BerrySB
<i>Oncorhynchus clarkii</i>	coast cutthroat trout	None	None		SSC	AFS_VU; USFS_S
<i>Oncorhynchus mykiss irideus</i> pop. 48	steelhead - northern California DPS summer-run	Threatened	Endangered			AFS_TH
<i>Oncorhynchus tshawytscha</i> pop. 30	chinook salmon - upper Klamath and Trinity Rivers ESU	Candidate	Threatened		SSC	USFS_S
<i>Pekania pennanti</i>	Fisher	None	None		SSC	BLM_S; IUCN_LC; USFS_S
<i>Piperia candida</i>	white-flowered rein orchid	None	None	1B.2		BLM_S; SB_CalBG/RSABG
<i>Ramalina thrausta</i>	angel's hair lichen	None	None	2B.1		
<i>Rana aurora</i>	northern red-legged frog	None	None		SSC	IUCN_LC; USFS_S
<i>Rana boylei</i> pop. 1	foothill yellow-legged frog - north coast DPS	None	None		SSC	BLM_S; USFS_S

<i>Rhyacotriton variegatus</i>	southern torrent salamander	None	None		SSC	IUCN_LC; USFS_S
<i>Rosa gymnocarpa</i> var. <i>serpentina</i>	Gasquet rose	None	None	1B.3		SB_BerrySB; SB_CalBG/RSABG
<i>Sanguisorba officinalis</i>	great burnet	None	None	2B.2		
<i>Sidalcea malviflora</i> ssp. <i>patula</i>	Siskiyou checkerbloom	None	None	1B.2		BLM_S; SB_UCSC
<i>Sidalcea oregana</i> ssp. <i>eximia</i>	coast checkerbloom	None	None	1B.2		BLM_S
<i>Streptanthus ob lanceolatus</i>	Trinity River jewelflower	None	None	1B.2		SB_UCSC; USFS_S
<i>Thermopsis robusta</i>	robust false lupine	None	None	1B.2		SB_UCSC; USFS_S

California Native Plant Society Rare Plant Inventory

Quads: Bald Hills, Blue Lake, Big Bar, Board Camp Mountain, Del Loma, Denny, Grouse Mountain, Hennessy Peak, Hoopa, Hopkins Butte, Hupa Mountain, Hyampom Mountain, Ironside Mountain, Korbel, Jim Jam Ridge, Lord-Ellis Summit, Maple Creek, Panther Creek, Rodgers Peak, Salmon Mountain, Salyer, Sims Mountain, Sportshaven, Tish Tang Point, Trinity Mountain, Weitchpec, and Willow Creek

ScientificName	CommonName	FESA	CESA	CRPR	OtherStatus
<i>Astragalus umbraticus</i>	Bald Mountain milk-vetch	None	None	2B.2	
<i>Bensoniella oregona</i>	bensoniella	None	CR	1B.1	SB_UCSC; USFS_S
<i>Botrypus virginianus</i>	rattlesnake fern	None	None	2B.2	
<i>Buxbaumia viridis</i>	green shield-moss	None	None	2B.2	BLM_S; USFS_S
<i>Carex arcta</i>	northern clustered sedge	None	None	2B.2	IUCN_LC
<i>Carex praticola</i>	northern meadow sedge	None	None	2B.2	
<i>Cornus unalaschkensis</i>	bunchberry	None	None	2B.2	
<i>Epilobium oreganum</i>	Oregon fireweed	None	None	1B.2	BLM_S; SB_CalBG/RSABG; USFS_S
<i>Erigeron maniopotamicus</i>	Mad River fleabane daisy	None	None	1B.2	BLM_S; SB_UCSC; USFS_S
<i>Erythranthe trinitensis</i>	pink-margined monkeyflower	None	None	1B.3	SB_CalBG/RSABG
<i>Erythronium oregonum</i>	giant fawn lily	None	None	2B.2	SB_UCSC
<i>Erythronium revolutum</i>	coast fawn lily	None	None	2B.2	SB_UCSC
<i>Gentiana plurisetosa</i>	Klamath gentian	None	None	1B.3	
<i>Gilia capitata ssp. pacifica</i>	Pacific gilia	None	None	1B.2	BLM_S; SB_CalBG/RSABG
<i>Hemieva ranunculifolia</i>	buttercup-leaf hemieva	None	None	2B.2	
<i>Hosackia yollabollensis</i>	Yolla Bolly Mtns. bird's-foot trefoil	None	None	1B.2	SB_CalBG/RSABG
<i>Iliamna latibracteata</i>	California globe mallow	None	None	1B.2	SB_CalBG/RSABG; USFS_S
<i>Juncus regelii</i>	Regel's rush	None	None	2B.3	
<i>Kopsiopsis hookeri</i>	small groundcone	None	None	2B.3	
<i>Lewisia cotyledon var. heckneri</i>	Heckner's lewisia	None	None	1B.2	BLM_S; SB_UCSC
<i>Lupinus elmeri</i>	South Fork Mountain lupine	None	None	1B.2	SB_CalBG/RSABG
<i>Montia howellii</i>	Howell's montia	None	None	2B.2	
<i>Oenothera wolfii</i>	Wolf's evening-primrose	None	None	1B.1	BLM_S; SB_BerrySB

<i>Packera bolanderi</i> var. <i>bolanderi</i>	seacoast ragwort	None	None	2B.2	
<i>Piperia candida</i>	white-flowered rein orchid	None	None	1B.2	BLM_S; SB_CalBG/RSABG
<i>Ramalina thrausta</i>	angel's hair lichen	None	None	2B.1	
<i>Rosa gymnocarpa</i> var. <i>serpentina</i>	Gasquet rose	None	None	1B.3	SB_BerrySB; SB_CalBG/RSABG
<i>Sanguisorba officinalis</i>	great burnet	None	None	2B.2	
<i>Schoenoplectus subterminalis</i>	water bulrush	None	None	2B.3	IUCN_LC
<i>Sedum divergens</i>	Cascade stonecrop	None	None	2B.3	
<i>Sidalcea malviflora</i> ssp. <i>patula</i>	Siskiyou checkerbloom	None	None	1B.2	BLM_S; SB_UCSC
<i>Sidalcea oregana</i> ssp. <i>eximia</i>	coast checkerbloom	None	None	1B.2	BLM_S
<i>Streptanthus oblongeolatus</i>	Trinity River jewelflower	None	None	1B.2	SB_UCSC; USFS_S
<i>Thermopsis robusta</i>	robust false lupine	None	None	1B.2	SB_UCSC; USFS_S

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Humboldt and Trinity counties, California



Local office

Arcata Fish And Wildlife Office

☎ (707) 822-7201

📠 (707) 822-8411

1655 Heindon Road
Arcata, CA 95521-4573

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
North American Wolverine Gulo gulo luscus Wherever found This species only needs to be considered if the following condition applies: Species may be present based on transient occurrence as it moves through or too suitable habitat. Effects should be considered to species and projects should consult with the Service, however, depending on the project, consultation may not be necessary. No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5123	Threatened
Pacific Marten, Coastal Dps Martes caurina Wherever found There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9081	Threatened

Birds

NAME	STATUS
California Condor Gymnogyps californianus No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8193	EXPN

Marbled Murrelet <i>Brachyramphus marmoratus</i>	Threatened
There is final critical habitat for this species. Your location overlaps the critical habitat. https://ecos.fws.gov/ecp/species/4467	
Northern Spotted Owl <i>Strix occidentalis caurina</i>	Threatened
Wherever found There is final critical habitat for this species. Your location overlaps the critical habitat. https://ecos.fws.gov/ecp/species/1123	
Western Snowy Plover <i>Charadrius nivosus nivosus</i>	Threatened
There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8035	
Yellow-billed Cuckoo <i>Coccyzus americanus</i>	Threatened
There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3911	

Reptiles

NAME	STATUS
Northwestern Pond Turtle <i>Actinemys marmorata</i>	Proposed Threatened
Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1111	

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i>	Proposed Threatened
Wherever found There is proposed critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i>	Proposed Endangered
No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10885	

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME	TYPE
Marbled Murrelet <i>Brachyramphus marmoratus</i>	Final
https://ecos.fws.gov/ecp/species/4467#crithab	
Northern Spotted Owl <i>Strix occidentalis caurina</i>	Final
https://ecos.fws.gov/ecp/species/1123#crithab	

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>

- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Mar 1 to Aug 31
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Mar 1 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read ["Supplemental Information on Migratory Birds and Eagles"](#), specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

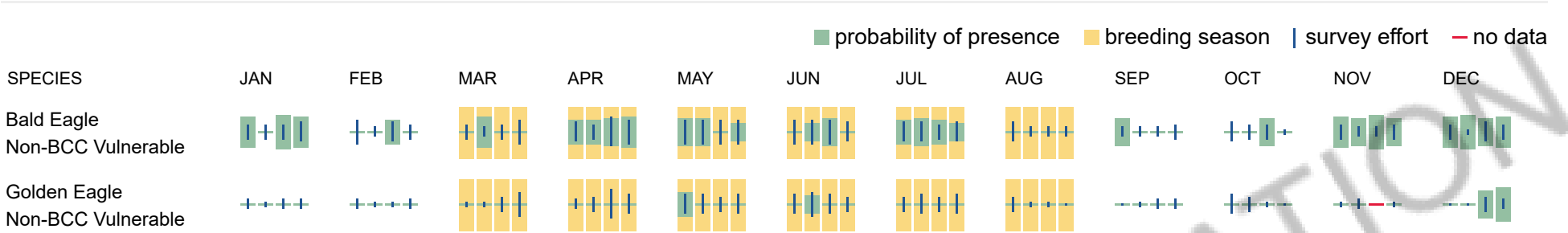
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases [birds of concern](#), including [Birds of Conservation Concern \(BCC\)](#), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the [Nationwide avoidance and minimization measures for birds](#) document, and any other project-specific avoidance and minimization measures suggested at the link [Measures for avoiding and minimizing impacts to birds](#) for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles document](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Allen's Hummingbird <i>Selasphorus sasin</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Mar 1 to Aug 31
Cassin's Finch <i>Haemorhous cassinii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9462	Breeds May 15 to Jul 15
Chestnut-backed Chickadee <i>Poecile rufescens rufescens</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jul 31
Evening Grosbeak <i>Coccothraustes vespertinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 10

Flammulated Owl <i>Psiloscopus flammeolus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/7728	Breeds May 10 to Aug 15
Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Mar 1 to Aug 31
Oak Titmouse <i>Baeolophus inornatus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9656	Breeds Mar 15 to Jul 15
Olive-sided Flycatcher <i>Contopus cooperi</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31
Oregon Vesper Sparrow <i>Poocetes gramineus affinis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5141	Breeds Apr 21 to Aug 31
Rufous Hummingbird <i>Selasphorus rufus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002	Breeds Apr 15 to Jul 15
Western Screech-owl <i>Megascops kennicottii cardonensis</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jun 30
Wrentit <i>Chamaea fasciata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (I)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

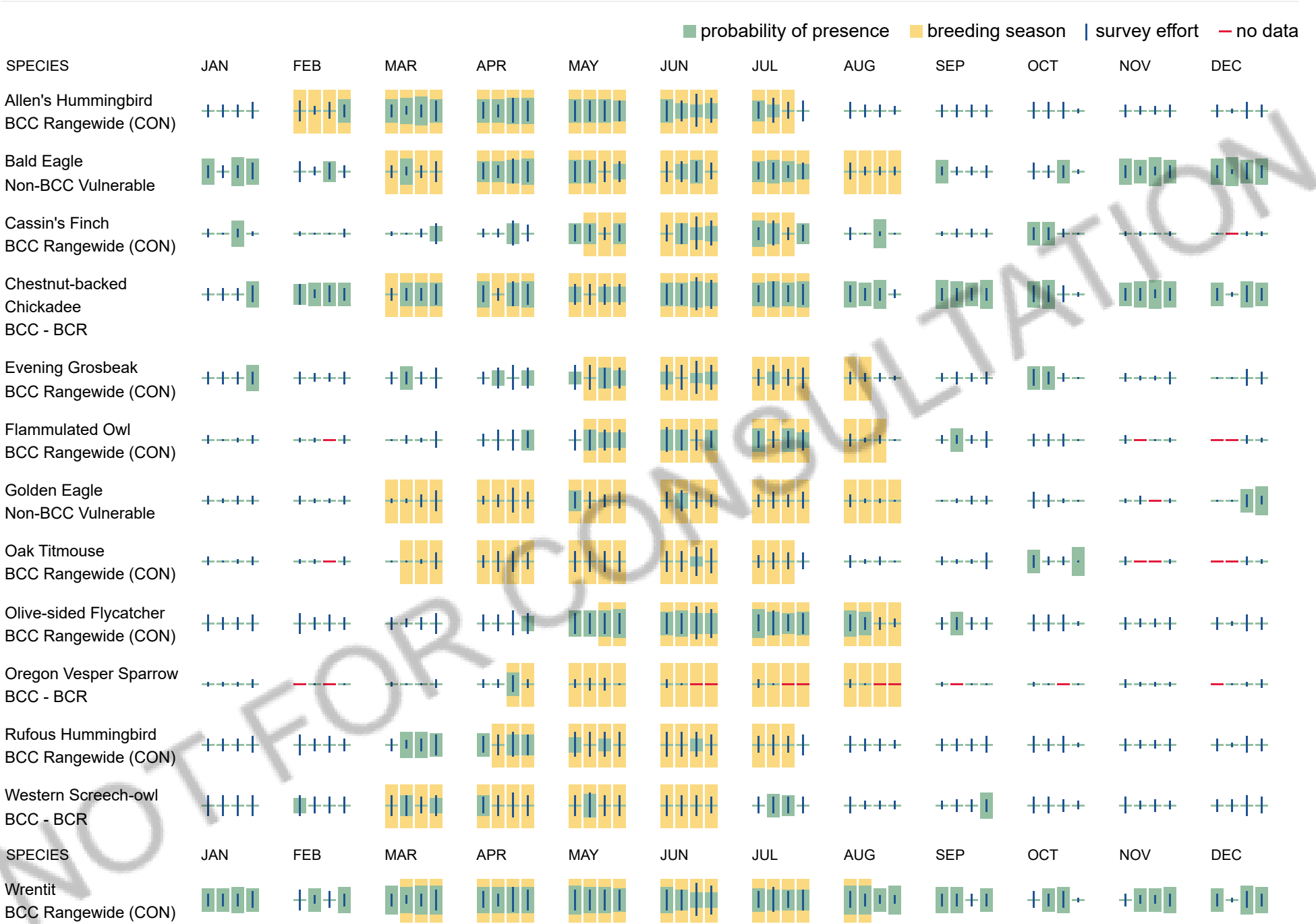
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Avoidance & Minimization Measures for Birds](#) describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the [Bald and Golden Eagle Protection Act](#) and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Bald and Golden Eagle Protection Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

Appendix B Site Photographs

Appendix B. Site Photographs

Photo No.	1	Photo No.	2
Date	04/09/2026	Date	04/09/2026
Aspect	East	Aspect	North-northwest
			
California bay woodland habitat in the Project area.		Mapped Klamath mixed conifer forest in the Project area (CALFIRE 2024).	
Photo No.	3	Photo No.	4
Date	04/08/2026	Date	04/08/2026
Aspect	Northwest	Aspect	Northeast
			
Mapped lacustrine habitat on a golf course within the Project area (CALFIRE 2024).		Mapped bigleaf maple woodland habitat in the Project area (CALFIRE 2024).	

Photo No.	5	Photo No.	6
Date	04/08/2026	Date	04/08/2026
Aspect:	West	Aspect:	Northeast
			
Observation of a mesic site along an unnamed waterway with black cottonwood and osoberry.		Mapped Douglas fir habitat in the Project area (CALFIRE 2024).	
Photo No.	7	Photo No.	8
Date	04/08/2026	Date	04/08/2026
Aspect	East-southeast	Aspect	Southeast
			
Mapped Douglas fir/montane hardwood-conifer habitat in the Project area (CALFIRE 2024).		Observation of seep in the Project area.	

Photo No.	9	Photo No.	10
Date	04/08/2026	Date	04/08/2026
Aspect	Northwest	Aspect	North
			
Mapped wet meadow habitat in the Project area (CALFIRE 2024).		Mapped montane hardwood habitat in the Project area (CALFIRE 2024).	
Photo No.	11	Photo No.	12
Date	04/08/2026	Date	04/08/2026
Aspect	Northwest	Aspect	Downstream; southeast
			
Observation of ponded area in montane chaparral habitat in the Project area (CALFIRE 2024).		Horse Linto Creek facing downstream; bigleaf maple and alder species were dominant in the riparian habitat along the creek.	

Photo No.	13	Photo No.	14
Date	04/08/2026	Date	04/08/2026
Aspect	Northeast	Aspect	East
			
Montane chaparral habitat in the Project area (CAL FIRE 2024).		Mapped mixed chaparral habitat in the Project area (CAL FIRE 2024).	
Photo No.	15	Photo No.	16
Date	04/08/2026	Date	04/08/2026
Aspect	South-southwest	Aspect	North
			
Mapped annual grassland in the Project area (CAL FIRE 2024). The area appears to be used as a pasture.		Mapped Ponderosa pine habitat in the Project area (CAL FIRE 2024).	

Photo No.	17	Photo No.	18
Date	04/08/2026	Date	04/09/2026
Aspect:	East	Aspect:	South
			
Small creek observed in Douglas fir habitat.		Mapped montane hardwood-conifer habitat with cedar, manzanita and bay laurel species dominant.	
Photo No.	19	Photo No.	20
Date	04/09/2026	Date	04/09/2026
Aspect	Not Applicable (NA)	Aspect	NA
			
Individual fawn lily species observed during the field visit. A large population of fawn lily species were observed.		Individual fawn lily species observed during the field visit. A large population of fawn lily species were observed.	

Photo No.	21	Photo No.	22
Date	04/09/2026	Date	04/09/2026
Aspect	South	Aspect	West
			
Habitat associated with an observed population of fawn lily.		Habitat associated with an observed population of fawn lily.	
Photo No.	23	Photo No.	24
Date	04/09/2026	Date	04/09/2026
Aspect	NA	Aspect	NA
			
Individual fawn lily species observed during the field visit.		Individual fawn lily species observed during the field visit.	

Photo No.	25	Photo No.	26
Date	04/08/2026	Date	04/08/2026
Aspect	NA	Aspect	NA
			
Presumed foothill yellow-legged frog observed 50 feet outside the Project area in the South Fork Trinity River.		Presumed foothill yellow-legged frog observed 50 feet outside the Project area in the South Fork Trinity River.	