PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CALVTP PROGRAM EIR

# Western Klamath Landscape Fuels Reduction and Forest Health Project

Prepared for:

Mid Klamath Watershed Council and CAL FIRE

June 2023

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# Western Klamath Landscape Fuels Reduction and Forest Health Project

Prepared for:

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# THE CALIFORNIA VEGETATION TREATMENT PROGRAM ENVIRONMENTAL CHECKLIST

# INTRODUCTION

The Mid Klamath Watershed Council is proposing the Western Klamath Landscape Fuels Reduction and Forest Health Project (proposed project) which would include vegetation treatments on 31,234 acres of private State Responsibility Area (SRA) lands in western Siskiyou and eastern Humboldt counties (project area). The proposed project would consist of ecological restoration and wildland-urban interface (WUI) fuel reduction treatment types and the proposed treatment activities are prescribed burning, mechanical treatments, and manual treatments. Initial treatments would be implemented in phases (i.e., as funding and resources allow) in small, non-contiguous treatment areas over a 15- to 20-year period.

## LEAD AGENCY

This document is being prepared for the Mid Klamath Watershed Council and serves to provide California Environmental Quality Act (CEQA) compliance for the implementation of vegetation treatments that require a discretionary action by a state or local agency. The CEQA lead agency is the California Department of Forestry and Fire Protection (CAL FIRE); its discretionary approval is the issuance of Forest Health Grant funding to implement treatments within a portion of the project area. In this Project-Specific Analysis and Addendum (PSA/Addendum), Mid Klamath Watershed Council is referred to as the "implementing entity" reflecting its role as the lead implementer of treatments. As defined in the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (EIR), 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. The Program EIR contemplated that the primary discretionary approval of the public agency project proponent would be implementing the treatments and associated standard project requirements (SPRs) and mitigation measures. However, for this proposed project, CAL FIRE's discretionary approval is to provide grant funding and Mid Klamath Watershed Council will be implementing treatments and associated SPRs and mitigation measures. Therefore, as used in this PSA/Addendum, unless otherwise noted, Mid Klamath Watershed Council is the project proponent.

## PURPOSE OF THIS PROJECT-SPECIFIC ANALYSIS AND ADDENDUM

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

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some 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, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revisions or change in the project, compared to the Program EIR, are the inclusion of areas outside of the CalVTP treatable

landscape and revisions to SPRs, which are integrated into the Program itself. Additionally, a proposed minor change to a mitigation measure is warranted due to a proposed SPR revision. The checklist below includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape and SPR and mitigation measure revisions.

This PSA/Addendum and attachments together support the finding that the proposed project is within the scope of the CalVTP Program EIR. Each resource topic below includes a discussion of impacts related to that resource area followed by discussions of SPRs and mitigation measures that are applicable for avoiding, minimizing, and mitigating impacts for that resource area. Supplemental analysis and information supporting the impact discussions can be found in the corresponding attachments. A within the scope finding requires the following components:

- Description of the impact of the proposed treatment project (see impact discussions under Sections EC-1 through EC-16 below and Attachment B)
- Summary of the impact in the CalVTP Program EIR (see impact discussions under Sections EC-1 through EC-16 below)
- Evidence the project impact is addressed by the Program EIR (see impact discussions under Sections EC-1 through EC-16 below and Attachment B)
- Identification of CalVTP SPRs and mitigation measures applicable to the proposed project (see SPR and mitigation measure discussions under Sections EC-1 through EC-16 below and Attachment A)
- Conclusion regarding consistency with the Program EIR (see impact discussions under Sections EC-1 through EC-16 below)

## Project Area Outside the CalVTP Treatable Landscape

Among the criteria for determining if a treatment project is within the scope of the CalVTP Program EIR is whether it is located in the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the Program EIR). Portions of the project area extend outside of the treatable landscape described in the CalVTP Program EIR. In total, these areas outside the treatable landscape encompass approximately 9,103 acres of the 31,234-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 disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed 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 Program EIR would be applicable.

## Proposed Revisions to CalVTP SPRs and Mitigation Measure

While the proposed treatment types and treatment activities are consistent with the CalVTP, CAL FIRE and Mid Klamath Watershed Council has deemed that certain requirements of CalVTP SPRs are infeasible, are not warranted to maintain the impact significance conclusions in the Program EIR, and, if implemented as presented in the Program EIR, would prevent Mid Klamath Watershed Council 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 Program EIR'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 SPRs and a 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 Program EIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as described below.

## SPR AQ-2 SUBMIT SMOKE MANAGEMENT PLAN

SPR AQ-2, as presented in the Program EIR, requires that the project proponent submit a smoke management plan for all prescribed burns to the applicable air district and includes specifics about when a smoke management plan would not be required, such as for burns less than 10 acres that are not conducted near smoke sensitive areas, in accordance with 17 CCR Section 80160.

Mid Klamath Watershed Council proposes to conduct prescribed burning in compliance with the burn authorization program of the applicable air district and would submit a smoke management plan for all prescribed burns when required by the applicable air district, in accordance with 17 CCR Section 80160. There are no functional changes to the requirements of SPR AQ-2 with these revisions; Mid Klamath Watershed Council would prepare and submit smoke management plans to the air district when required for prescribed burning. This change is proposed to clarify and simplify the text of this SPR for implementation purposes while maintaining the original intent and overall requirements regarding the preparation of smoke management plans.

Potential impacts resulting from revisions to SPR AQ-2 are discussed below under Section E.C-2, “Aesthetics and Visual Resources,” and Section EC-4, “Air Quality.” As explained in these sections, the proposed revisions to SPR AQ-2 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR AQ-2 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR AQ-2 are shown in underline and strikethrough in the MMRP (Attachment A).

## SPR AQ-3 CREATE BURN PLAN

SPR AQ-3, as presented in the Program EIR, 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.

Mid Klamath Watershed Council 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, or equivalent (California PBA 2022) to better follow the procedures currently used by Mid Klamath Watershed Council for prescribed burning. 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 Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council would 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 below under Section EC-2, “Aesthetics and Visual Resources,” Section EC-4, “Air Quality,” Section EC-6, “Biological Resources,” Section EC-7, “Geology, Soils, Paleontology, and Mineral Resources,” Section EC-8, “Greenhouse Gas Emissions,” Section EC-11, “Hydrology and Water Quality,” and Section EC-17, “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 Program EIR. 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).

## SPR AQ-4 MINIMIZE DUST

SPR AQ-4, as presented in the Program EIR, 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.

Mid Klamath Watershed Council 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 Program EIR. 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 below under Section EC-4, “Air Quality,” and Section EC-6, “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 Program EIR. 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).

## SPR AQ-6 PRESCRIBED BURN SAFETY PROCEDURES

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

To maintain personnel and public safety, Mid Klamath Watershed Council proposes to prepare Incident Action Plans 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 covey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement a 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 overall requirements regarding safety during prescribed burns.

Potential impacts resulting from revisions to SPR AQ-6 are discussed below under Section 4.3, “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 Program EIR. 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).

## SPR CUL-2 CONTACT GEOGRAPHICALLY AFFILIATED NATIVE AMERICAN TRIBES

SPR CUL-2, as presented in the Program EIR, requires that the project proponent obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent must notify the California Native American Tribes in the counties where the treatment activity is located.

Mid Klamath Watershed Council has knowledge of and established relationships with geographically affiliated tribes and proposes to use their own tribal contact list in place of the NAHC’s list and notify the specific tribes with known affiliation with the project area. This revision is consistent with the purpose of SPR

CUL-2 to notify the California Native American Tribes about a proposed project that are geographically affiliated with the project area. This change would tailor this measure to be more project-specific by contacting the tribes with known affiliation with the project area to increase the likelihood of receiving input.

Potential impacts resulting from revisions to SPR CUL-2 are discussed below under Section EC-5, "Archaeological, Historical, and Tribal Cultural Resources." As explained in this section, the proposed revisions to SPR CUL-2 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR CUL-2 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR CUL-2 are shown in underline and strikethrough in the MMRP (Attachment A).

## SPR GEO-1 SUSPEND DISTURBANCE DURING HEAVY PRECIPITATION

SPR GEO-1, as presented in the Program EIR, 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.

Mid Klamath Watershed Council 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. 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 below under Section EC-6, "Biological Resources," Section EC-7, "Geology, Soils, Paleontology, and Mineral Resources," and Section EC-11, "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 Program EIR. 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).

## SPR HAZ-3 REQUIRE FIRE EXTINGUISHERS

SPR HAZ-3, as presented in the Program EIR, requires that tree cutting crews carry one fire extinguisher per chainsaw, and requires that each vehicle be equipped with the one long-handled shovel and one axe or Pulaski, consistent with Public Resources Code (PRC) Section 4428.

Mid Klamath Watershed Council proposes to require tree cutting crews to carry one backpack pump-type fire extinguisher filled with water and each vehicle to carry the required hand tools for firefighting, 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 below under Section EC-17, "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 Program EIR. 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).

## SPR HYD-4 IDENTIFY AND PROTECT WATERCOURSE AND LAKE PROTECTION ZONES

SPR HYD-4, as presented in the Program EIR, prohibits fire ignition and use of accelerants within Watercourse and Lake Protection Zones (WLPZs). SPR HYD-4 allows for low intensity backing fires to enter or spread into WLPZs. As described in the CalVTP Program EIR, prescribed burning – specifically higher intensity fire or ignition – within the WLPZ could result in removal of understory vegetation along streams and lakes, which could result in instability or erosion, reduction in stormwater filtration, and potential subsequent water quality impacts that could affect aquatic wildlife species. Additionally, typical accelerants (e.g., potassium perchlorate, gasoline, diesel, mixed gas) and post-fire residue associated with these accelerants can adversely affect water quality if introduced to wetlands, streams, or lakes, as described in the CalVTP Program EIR.

Mid Klamath Watershed Council proposes to conduct broadcast burning activities within meadows in the project area. Meadows in the project area vary in character, with most mapped as containing fresh emergent wetland habitat and some being bisected by Class III or Class IV streams. Streams and wetlands within meadows in the project area have not been delineated. As a result, it is possible that meadows that would be subject to broadcast burning contain stream habitat that would have associated WLPZ restrictions pursuant to SPR HYD-4, including prohibition of ignition and the use of accelerants within the WLPZ.

Due to the size and relatively flat topography of the meadows in the project area, it is unlikely that low intensity backing fires ignited consistent with the Program EIR limitations would adequately burn the meadow because the fire may not carry due to prevailing winds and lack of slope. Additionally, direct ignition is required to safely maintain control of the fire and initiate the fire behavior that will prevent undesirable fire effects. To meet treatment objectives, Mid Klamath Watershed Council would directly ignite vegetation within meadows using only propane torches or traditional methods (e.g., pitch sticks or grass bundles) to better control fire behavior, which would require a revision of the restrictions in SPR HYD-4. Without this revision to SPR HYD-4 the objective to conduct broadcast burning in meadows could not be achieved. See “Treatment Types” below for more information regarding the importance of conducting broadcast burning in meadow habitats to achieve the restoration goals of the project.

Potential impacts resulting from revisions to SPR HYD-4 are discussed below under Section EC-6, “Biological Resources,” Section EC-7, “Geology, Soils, Paleontology, and Mineral Resources,” and Section EC-11, “Hydrology and Water Quality.” As explained in these sections, the proposed revisions to SPR HYD-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of this revision, because SPR HYD-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR HYD-4 are shown in underline and strikethrough in the MMRP (Attachment A).

## SPR AD-4 PUBLIC NOTIFICATIONS FOR PRESCRIBED BURNING

SPR AD-4, as presented in the Program EIR, 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.

Mid Klamath Watershed Council 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, Mid Klamath Watershed Council 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. Mid Klamath Watershed Council proposes these revisions to tailor SPR AD-4 to include public outreach mechanisms that 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 below under Section EC-2, "Aesthetics," and Section EC-4, "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 Program EIR. 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).

### MITIGATION MEASURE BIO-4 DESIGN TREATMENT TO AVOID LOSS OR DEGRADATION OF RIPARIAN HABITAT FUNCTION

As presented in the Program EIR, Mitigation Measure BIO-4 contains the same prohibition of fire ignition and use of accelerants within WLPZs as stated in SPR HYD-4. As with SPR HYD-4, proposed revisions to Mitigation Measure BIO-4 would allow ignition within meadows using only propane torches or traditional methods (e.g., pitch sticks or grass bundles). The same reasons for the proposed revisions to SPR HYD-4 apply to the proposed revisions to Mitigation Measure BIO-4.

Potential impacts resulting from revisions to Mitigation Measure BIO-4 are discussed below under Section EC-6, "Biological Resources." As explained in this section, the proposed revisions to Mitigation Measure BIO-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of this revision, because Mitigation Measure BIO-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to Mitigation Measure BIO-4 are shown in underline and strikethrough in the MMRP (Attachment A).

## MITIGATION MONITORING AND REPORTING PROGRAM

This PSA/Addendum also serves as a mitigation monitoring and reporting program (MMRP) in accordance with CEQA and the State CEQA Guidelines (Public Resources Code Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097). A MMRP is required for approval of the proposed project because this PSA/Addendum identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. SPRs, which are environmental protection features included as part of the project description, have been incorporated to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. The numbering of SPRs and mitigation measures follows the numbering used in the Program EIR. SPRs and mitigation measures that are referenced in more than one resource section below are not duplicated in Attachment A. Instructions for project-specific implementation of certain SPRs and Mitigation Measures have been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to SPRs and mitigation measures in the PEIR are shown in underline and strikethrough (e.g., herbicide application is not a proposed treatment under this PSA, so references to herbicide application in the SPRs and mitigation measures have been deleted in strikethrough). In all cases, the additional project-specific implementation instruction and clarifying edits to the SPRs and mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the PEIR. The MMRP requirements covered in this PSA/Addendum are described below.

- SPRs and Mitigation Measures – Brief discussions indicating whether an SPR or mitigation measure is applicable to this project are included under each resource section below.
- Implementing Entity & Timing Relative to Implementation – This identifies the agency responsible for implementing the measure and time frame in which the SPR or mitigation measure will be implemented for each applicable SPR/mitigation measure.

- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.

The Mid Klamath Watershed Council will document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting a project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

# PROJECT INFORMATION

1. **Project Title:** **Western Klamath Landscape Fuels Reduction and Forest Health Project**

2. **CAL FIRE Project Number** **8GG20609**

3. **CalVTP I.D. Number** **2022-33**

4. **Project Proponent Name and Address:**

   Mid Klamath Watershed Council
   PO Box 409
   38150 Highway 96
   Orleans, CA 95556

5. **Contact Person Information and Phone Number:**

   Will Harling
   Director, Mid Klamath Watershed Council
   General Phone: 530.627.3202
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6. **Project Location:**

   Western Klamath Mountains, including portions of western Siskiyou and eastern Humboldt counties (Figures 1 through 6).

7. **Total Area to be Treated (acres): 31,234 (initial treatments implemented over a 15- to 20-year period)**

8. **Description of Project:**

The proposed project consists of vegetation treatments in the western Klamath Mountains within and adjacent to the 1.2-million-acre planning area of the Western Klamath Restoration Partnership (Figures 1 through 6). The elevation of the project area ranges from approximately 400 to 7,200 feet. The CalVTP treatment types that would be implemented are ecological restoration and WUI fuel reduction. The proposed CalVTP treatment activities are prescribed burning, mechanical treatments, and manual treatments. The location within which the proposed CalVTP treatments would be implemented are shown in Figures 2 through 6 and are summarized in Table 1, below. The current conditions in the project area include overstocked forests, dense shrublands, and meadows that have been degraded and as a result are experiencing conifer, hardwood, and shrub encroachment. Proposed treatments aim to increase biodiversity, ecosystem health, and climate resilience by recreating pre-suppression vegetation distribution to establish functioning, resilient, heterogeneous forests and meadows at multiple scales and process-based restoration through fire.

Implementation of initial treatments would require between 1 and 60 crew members depending on the treatment, along with their associated vehicles to travel to and from the treatment areas. However, typical crews would consist of two to ten people. Up to four crews could be conducting treatments simultaneously throughout the project area. Treatment activities would occur during the daytime, typically between approximately 7:00 a.m. and 6:00 p.m., depending on season and proximity to residences; however, some nighttime prescribed burning may occur.

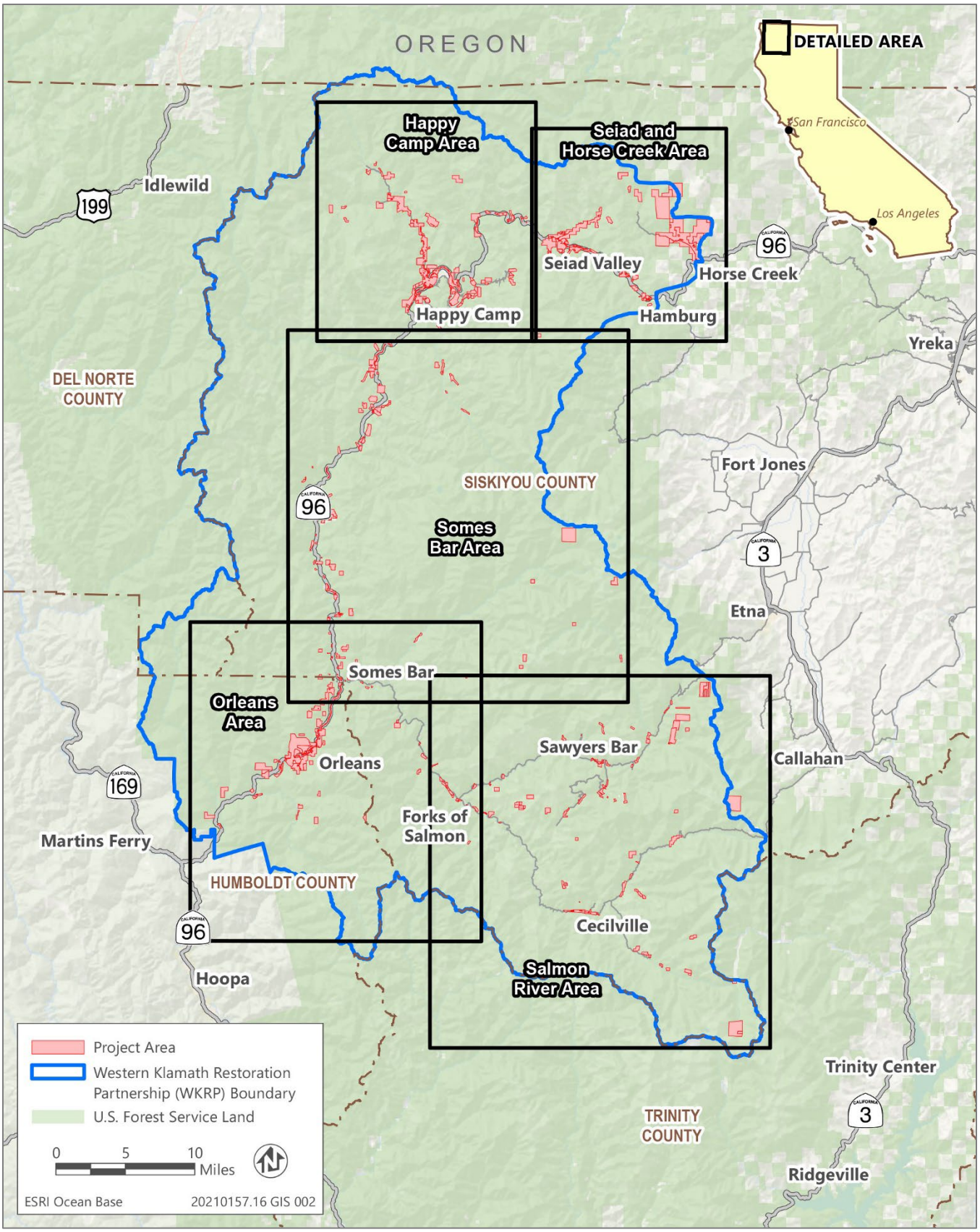
The proposed project would include a series of integrated prescribed fire, fuel reduction, and ecological restoration treatments to be implemented in phases in small, non-contiguous treatment areas over a 15 to 20-year period. Treatments would begin in 2023, depending on funding, equipment/contractor availability, weather conditions, and other restrictions. Mechanical treatments could occur year-round, except if restrictions occur due to fire danger or if the project area is unreachable because of snow or rain conditions. Manual removal of invasive plants could occur year-round; however, it would be typically concentrated in the spring and summer months on an annual basis. Other manual treatments

could also occur year-round. Prescribed burning would occur in fall, winter, spring, and early summer in coordination with regulatory agencies (e.g., Humboldt, Del Norte, and Siskiyou CAL FIRE units; Siskiyou County Air Pollution District; North Coast Unified Air Quality Management District).

**Table 1 Proposed CalVTP Treatments**

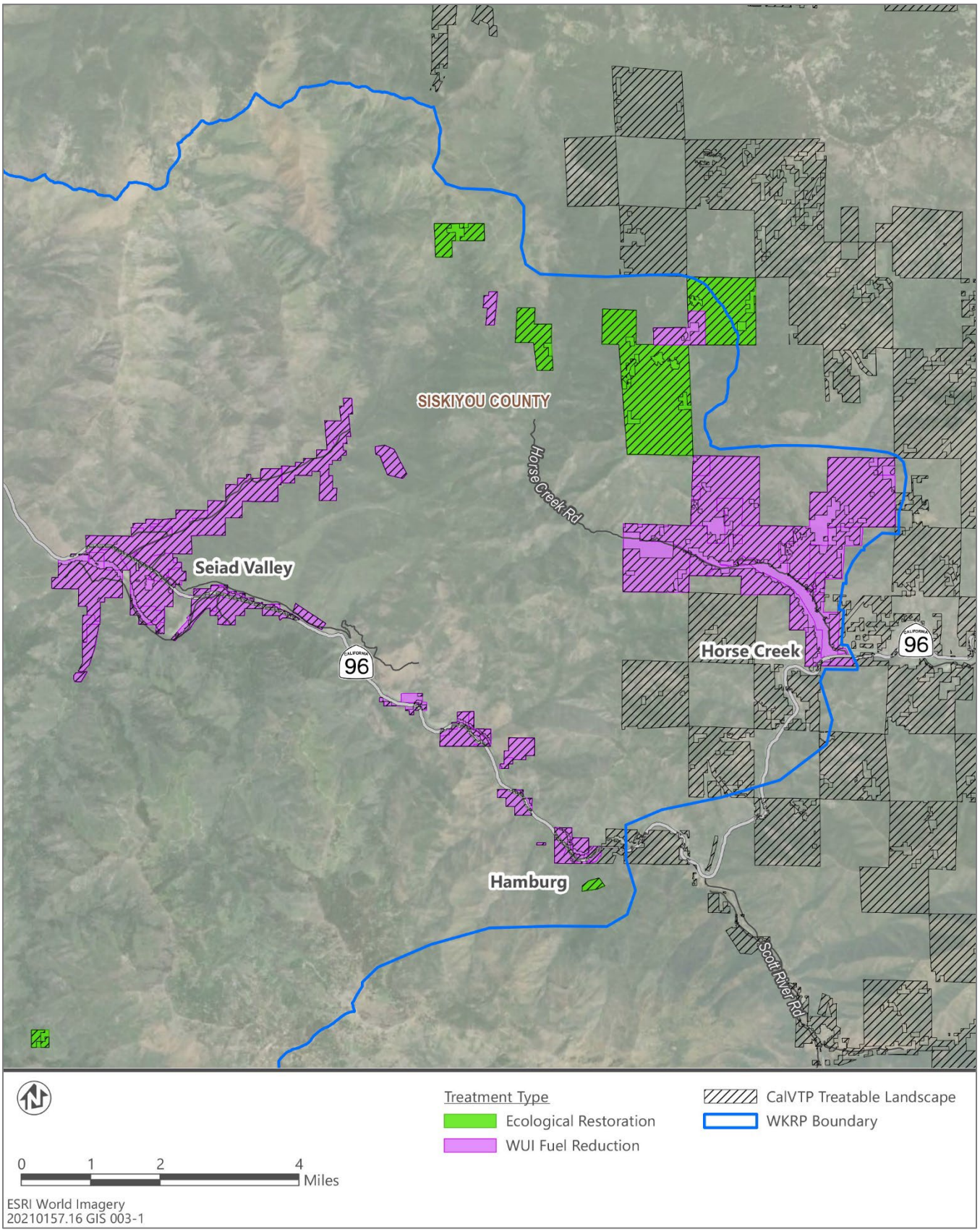
| CalVTP Treatment Type | Treatment Description | CalVTP Treatment Activity | Treatment Size (Acres) | Equipment Used for Treatments | Typical Duration of Treatments |
|---|---|---|---|---|---|
| Ecological Restoration | Restoration of meadows and enhancement of forest ecosystems | Prescribed burning (pile burning, broadcast/underburning); Mechanical (whole tree removal, mastication, biomass chipping, machine piling); Manual (hand thinning, pruning, piling) | 6,489 | Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers | Prescribed burning: 1 day to 2 weeks; Mechanical and Manual treatments: 1 to 6 months |
| WUI Fuel Reduction | Improvement of egress, fire control, development of fire-adapted communities | Prescribed burning (pile burning, broadcast/underburning); Mechanical (whole tree removal, mastication, biomass chipping, machine piling); Manual (hand thinning, pruning, piling) | 24,745 | Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers | Prescribed burning: 1 day to 2 weeks; Mechanical and Manual treatments: 1 to 6 months |
| Total Acres | | | 31,234 | | |

Source: Data and information provided by the Mid Klamath Watershed Council in 2022. ATV = all-terrain vehicle; UTV = utility task vehicle.



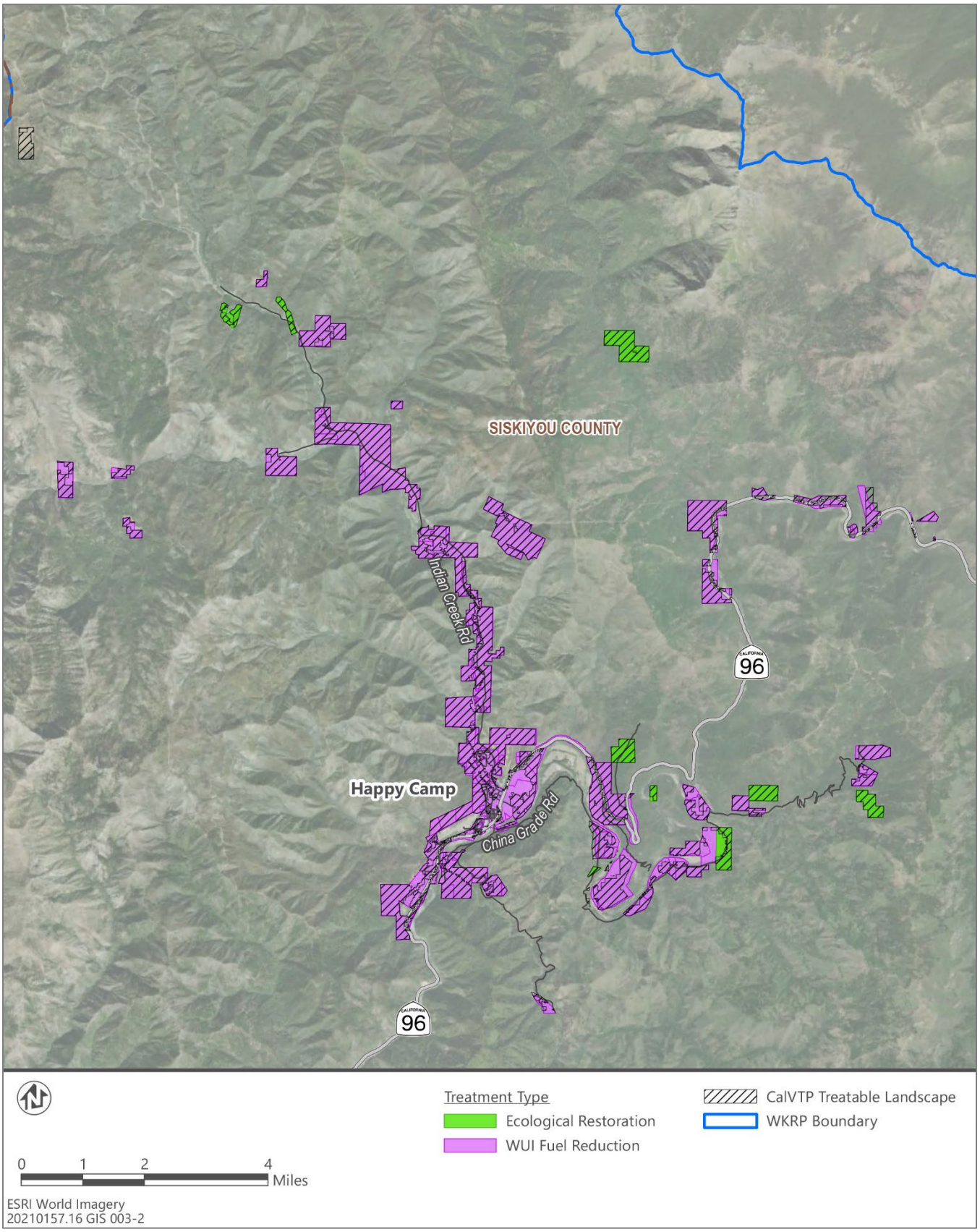

Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022.

Figure 1 Regional Location



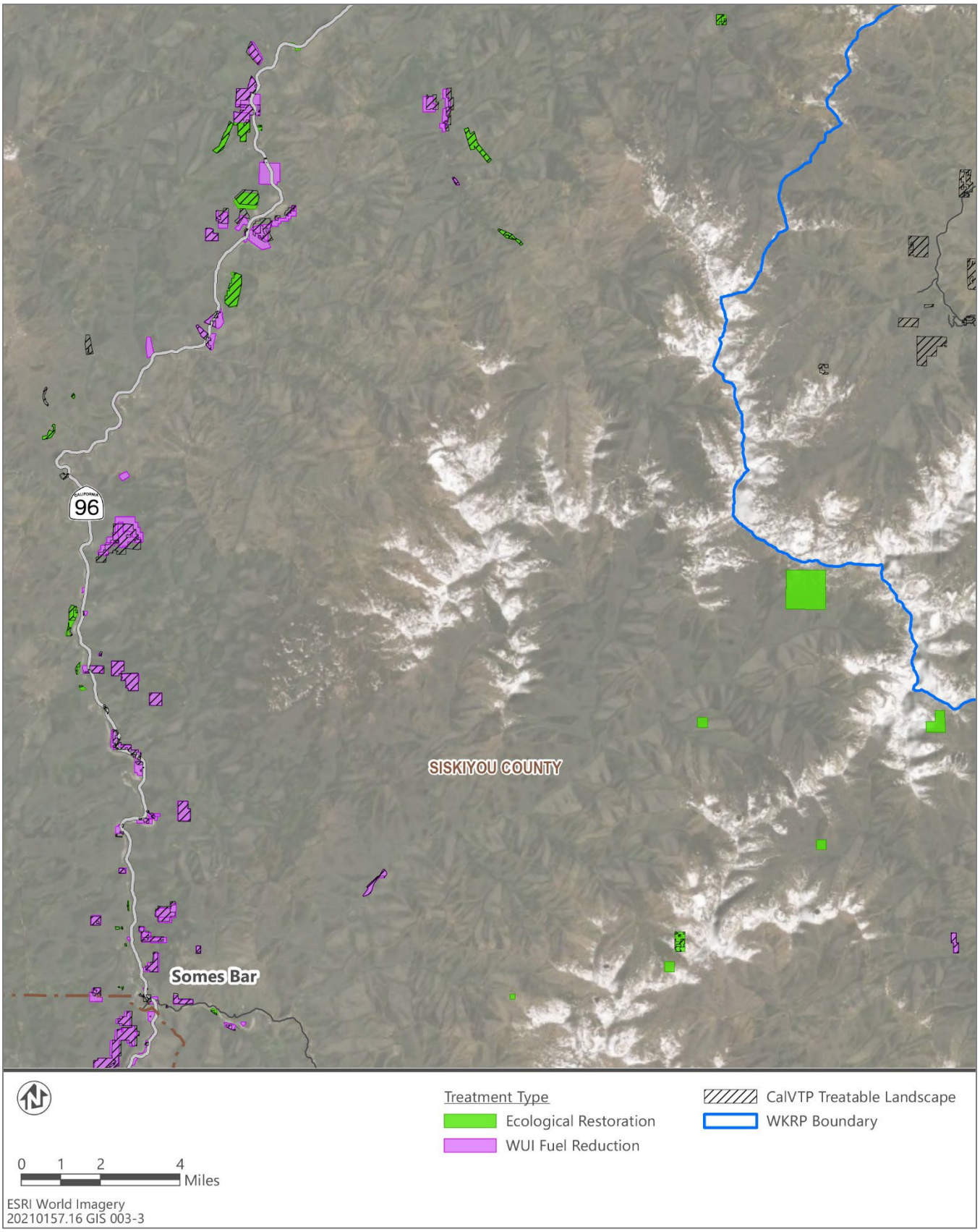

Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022.

Figure 2 Proposed Project Treatments – Seiad Valley and Horse Creek Area



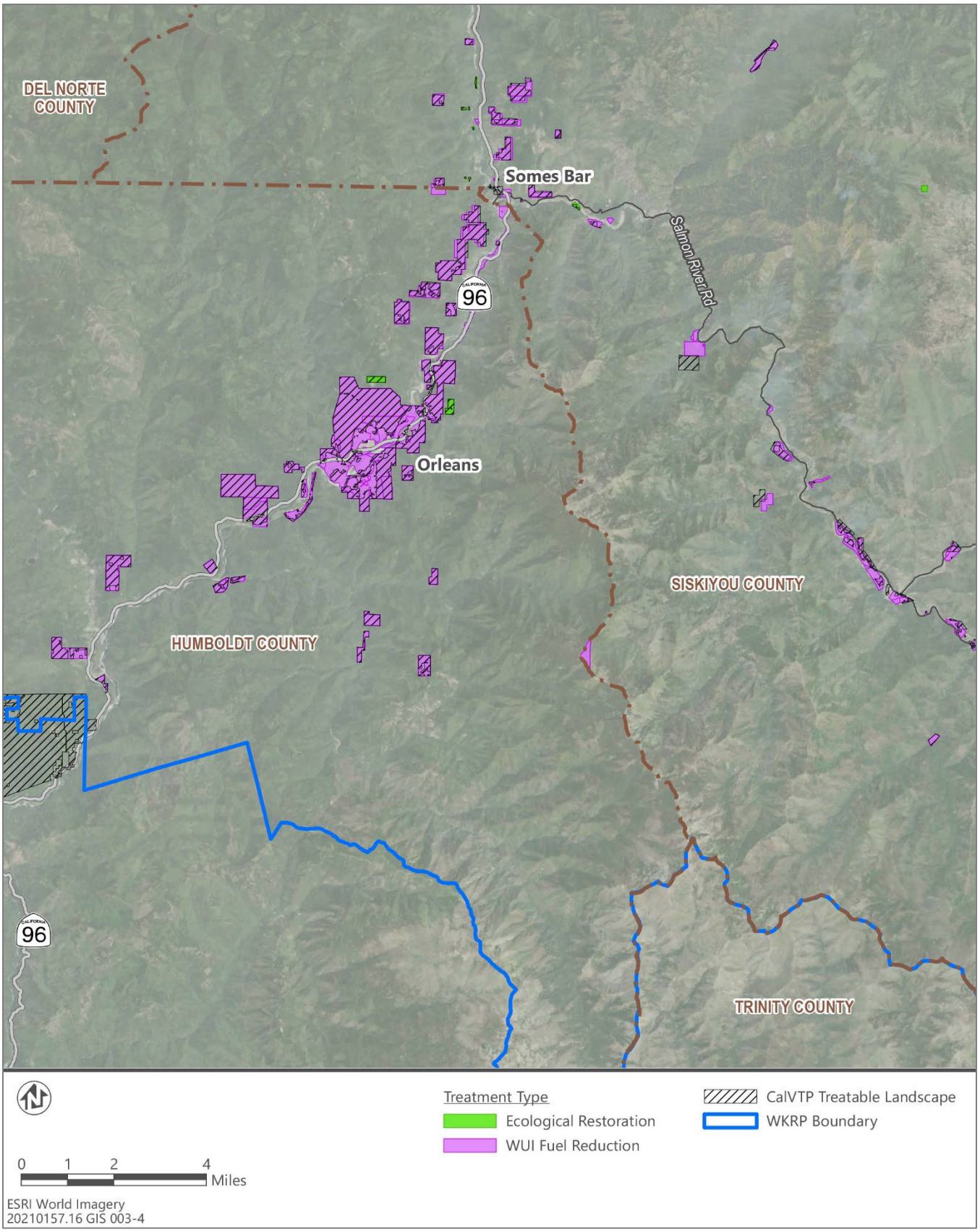

Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022.

Figure 3 Proposed Project Treatments – Happy Camp Area



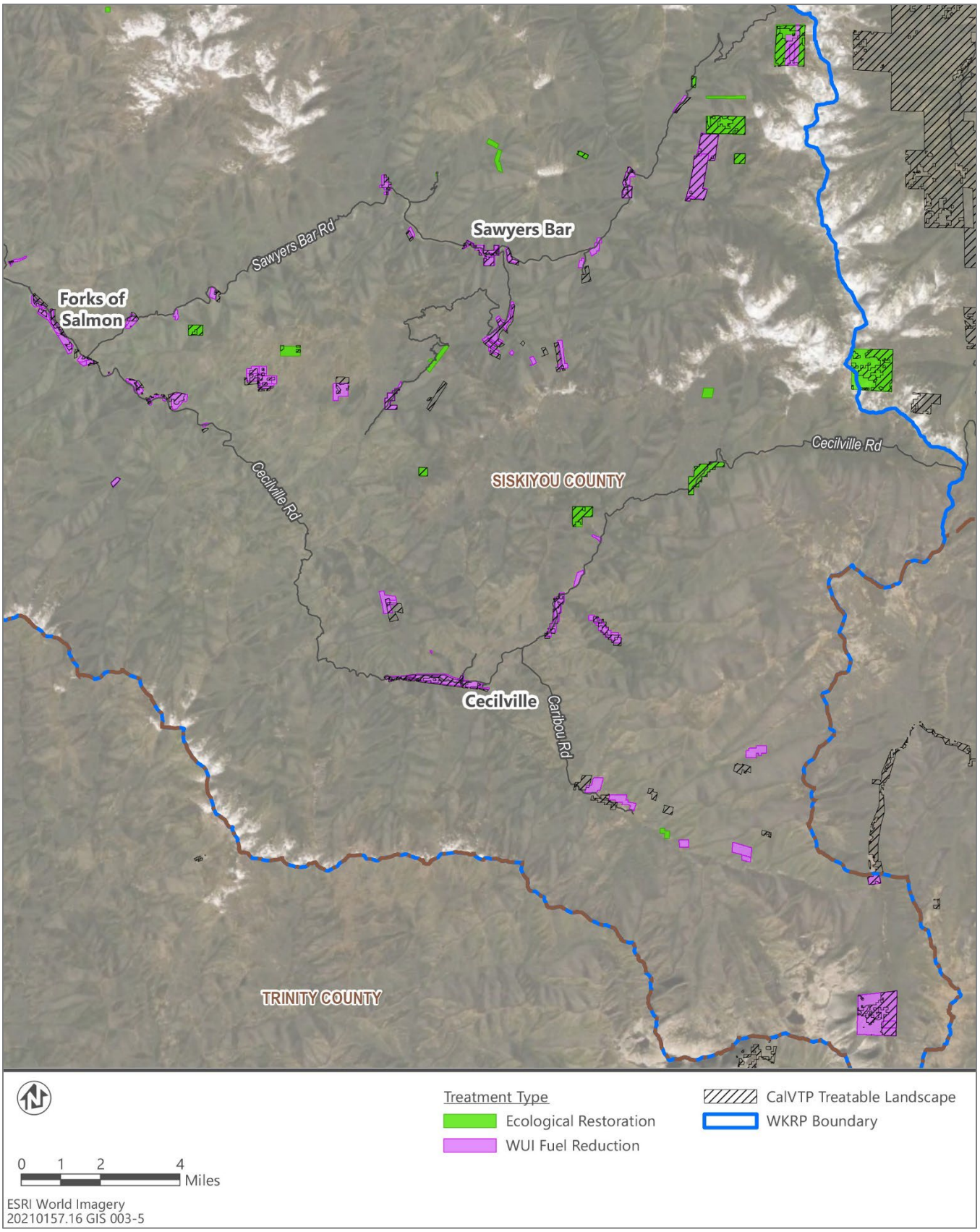

Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022.

**Figure 4 Proposed Project Treatments – Somes Bar Area**




Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022.

Figure 5 Proposed Project Treatments – Orleans Area




Sources: Data received from Mid Klamath Watershed Council in 2022; adapted by Ascent in 2022; WKRP=Western Klamath Restoration Partnership.

Figure 6 Proposed Project Treatments – Salmon River Area

# Treatment Types

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

## ECOLOGICAL RESTORATION

Ecological restoration treatments would be designed to reduce wildfire risk, enhance natural ecological processes, restore meadows, and improve forest health. Ecological restoration treatments would occur in several vegetation types: conifer forest (e.g., Douglas fir, Klamath mixed conifer, white fir), montane hardwood-conifer, montane chaparral, grassland, riparian habitat, and meadows (wet and dry). Species preference (i.e., tree species that would be retained) would vary, but in general would include black oak (*Quercus kelloggii*), white oak (*Quercus garryana*), sugar pine (*Pinus lambertiana*), incense cedar (*Calocedrus decurrens*), Port Orford cedar (Chamaecyparis lawsoniana), ponderosa pine (*Pinus ponderosa*), Jeffrey pine (*Pinus jeffreyi*), Pacific madrone (*Arbutus menzesii*), and Pacific yew (*Taxus brevifolia*). Late seral Douglas fir (*Pseudotsuga menziesii*) and tanoak (*Lithocarpus densiflora*) would also typically be retained across all treatment types. Additionally, red alder (*Alnus rubra*), and cottonwoods (*Populus* spp.) within riparian areas would be retained (as required by SPR BIO-4). Heterogeneity in treated areas would be restored by selectively thinning using mechanical treatments and manual treatments and by thinning with moderate severity prescribed burning. These treatments would be maintained with prescribed burning 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 forests and meadows at multiple scales. These treatments would benefit cultural uses, native flora, wildlife habitat, and increase successional complexity.

Meadows in the project area would be treated with broadcast burning. Wildfire is one of the key disturbance regimes that affects wet meadows in California (Sims et al. 2019). Historically, fires in wet meadows were ignited by natural causes (e.g., lightning) and humans (Dwire and Kauffman 2003; Turner et al. 2011; Lake and Long 2014; Norgaard et al. 2016; Karuk Tribe 2019). Due to modern fire suppression activities, the fire return interval in montane meadows in the project region has increased compared to historical fire frequency (Gross and Coppoletta 2013). A vulnerability analysis conducted in 2019 showed that wet meadows in northern California have moderate-high vulnerability to climate and climate-driven factors (e.g., amount of snowpack, drought, precipitation amount and timing), exposure to projected future climate change, disturbance regimes (e.g., flooding, wildfire), and non-climate stressors (e.g., livestock grazing, dams and water diversions, fire suppression) (Sims et al. 2019). Fire suppression in wet meadows occurring alongside dewatering disturbances have contributed to tree encroachment, lowering of the water table, and increased risk of high-severity wildfire (Sims et al. 2019). Wet meadows are extremely sensitive to the negative impacts of high-severity wildfire (Norgaard et al. 2016; Long and Davis 2016). Wet meadows that are degraded (e.g., meadows from the implementation of water diversions and ditches, hydrological modification from livestock such as channel incision) have less resistance to disturbance events such as wildfire (Viers et al. 2013) which may increase negative structural change and drying, potentially leading to a transition to upland habitat in the future (Sims et al. 2019).

Prescribed burning is a management action capable of improving the adaptive capacity of wet meadows in California that have experienced degradation (Sims et. al 2019). Prescribed burning of appropriate intensity and frequency has multiple benefits in wet meadows. Low- to moderate-intensity fires that are relatively frequent can control conifer encroachment and raise the water table by killing off encroaching seedlings and smaller trees (Lake 2007; Norgaard et al. 2016). High-severity wildfire also has the potential to increase the flow of water, charcoal, sediment, and woody debris within meadow habitats (Ratliff 1985). Burning that occurs where meadow and forests meet also has the potential to expand the footprint of wet meadows (Ratliff 1985) helping to reduce conifer encroachment. Additionally, prescribed burning assists in the maintenance of culturally important plant populations of

value to indigenous tribes (e.g., leopard lily [*Lilium pardalinum*]) (Lake 2007; Norgaard et al. 2016). Treating meadows in the project area with broadcast burning could help achieve these benefits.

Ecological restoration treatments would:

- thin ladder fuels (i.e., hardwoods and conifers) and suppressed and intermediate trees less than 12 inches diameter at breast height (dbh);
- 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 a qualified Registered Professional Forester (RPF) or biologist;
- remove conifer trees (primarily Douglas fir) 12–24 inches dbh (no more than 300 trees per year from the project area) with the purpose of using these whole trees for future instream fish habitat restoration projects. Trees would be selected by an RPF or designee and prioritized for removal based on the need to create defensible space, among other criteria. Conifers greater than 12 inches dbh and up to 24 inches dbh will not be removed from habitats suitable for wildlife species associated with late seral forest habitats (e.g., northern spotted owl [*Strix occidentalis caurina*], fisher [*Pekania pennanti*], Humboldt marten [*Martes caurina humboldtensis*]) or species that may nest or den in large conifers (e.g., fisher, Humboldt marten, ringtail [*Bassariscus astutus*], Sonoma tree vole [*Arborimus pomo*]) as determined by a qualified RPF or biologist. These trees would not be removed during wet weather conditions.

  Conifer trees removed for the purpose of fish habitat restoration projects will be removed using a 35,000–70,000 lb excavator to carefully dig up the root wad and tip trees over slowly to minimize damage to adjacent vegetation and soils. 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 in a suitable burn window with all appropriate permits 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. Mid Klamath Watershed Council will obtain any state or federal permits required for in-stream restoration activities. Only existing roads would be used to transport these materials;
- prune lower branches of trees up to six feet above ground;
- thin areas where only small diameter trees are present to an average of 24 feet between trees to promote better growth of retained trees;
- thin areas containing Douglas fir or pine plantations to increase tree spacing and minimize the potential for bark beetle infestations;
- thin or remove encroaching conifers, hardwoods, and shrubs less than 12 inches dbh from existing and historic meadows.
- retain an average of 40–60 percent canopy closure;
- in forest habitats determined to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by northern spotted owl by a qualified RPF or biologist (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics,

complex forest structure), treatments would be designed to reduce canopy cover by no more than 30 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained;

- preferentially remove trees with mistletoe infections, sooty mold, conks (i.e., the spore producing fruiting structures of a fungus) or other signs of rot, broken tops, or other damage, unless these trees exhibit documented wildlife use;
- retain largest down logs up to three logs per acre beyond 300 feet from homes or within 100 feet on either side of a fire control feature or an ingress/egress road to private property. Downed logs will not be protected during prescribed burning; however, under moderate weather conditions and fuel moisture required for prescribed burning, the largest downed logs will most likely remain;
- retain snags beyond 500 feet from homes, fire control features, or ingress or egress roads to private lands, with a preference for the largest snags that exhibit the form and decay characteristics favored by wildlife, unless the snags pose a hazard to implementation or personnel;
- in contiguous treatment areas larger than 50 acres, establish “retention patches” where forest canopy would be retained from 5 to 10 percent of each treatment unit clumped in 0.25- to 1.0-acre patches, strategically placed where there is evidence of culturally important gathering areas or special-status species habitats that would benefit from shade. Where woodrat (*Neotoma* spp.) nests are present, retention patches within 0.25 acre of the nests (i.e., including the nest and habitat surrounding the nest) would be established and all tanoak sprouts less than 4 inches dbh would be cut to encourage resprouting and to create future woodrat habitat where appropriate;
- establish openings in forest canopy to increase heterogeneity in areas that would benefit from increased or filtered light (e.g., encroached meadows) and to improve foraging habitat for elk; and
- remove non-native invasive plants by hand tools or light equipment such as weed-whackers.

## WUI FUEL REDUCTION

WUI fuel reduction treatments would be designed to reduce wildfire risk, develop fire-adapted communities, improve forest health and the production of cultural resources, and encourage sustainable tree species mix. Treatments would vary slightly depending on the vegetation type being treated. WUI fuel reduction treatments would:

- thin ladder fuels (i.e., hardwoods and conifers) less than 12 inches dbh;
- remove small diameter (i.e., less than 12 inches dbh) trees where larger (i.e., greater than 12 inches dbh) conifers and oaks exist;
- thin areas where only small diameter trees are present to an average of 24 feet between trees;
- thin areas containing Douglas fir or pine plantations to increase tree spacing and minimize the potential for bark beetle infestations;
- retain an average of 40–50 percent canopy closure;
- preferentially remove trees with mistletoe infections, sooty mold, conks or other signs of rot, broken tops, or other damage;
- remove up to 50 percent of downed logs within 300 feet of homes;
- remove 60 to 80 percent of shrubs within 500 feet of homes;
- remove 90–100 percent of snags within 500 feet of homes, fire control features, or ingress or egress roads to private lands;
- prune lower branches of trees to six feet above ground or more where feasible;
- manually or mechanically cut, pile, and pile burn jackpot fuels (i.e., snow-downed or wind-thrown trees of any diameter) within 1,000 feet of structures, fire control features, and ingress or egress roads into private property; and

- remove non-native invasive plants by hand tools or light equipment such as weed-whackers.

# 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, and manual treatments. Biomass would be processed using mastication, chipping, piling and burning, and lop and scatter. Each of these activities is included in the CalVTP Program EIR and is described in more detail below.

## PRESCRIBED BURNING

Prescribed burning would occur on up to 28,000 of the 31,234 acres proposed for treatment over the 15- to 20-year initial-treatment implementation period and consists of two general types, pile burning and broadcast burning (underburning).

### Broadcast Burning

Broadcast burning would be used to promote forest health and native flora and reduce biomass and fuel loading in grassland, woodland, and forest vegetation. Pretreatment of vegetation using mechanical or manual activities may occur, where necessary, in areas proposed for broadcast burning. Broadcast burning in meadow habitats would help restore historic fire intervals to meadows, reduce fine fuels, and rejuvenate native grasses and willows.

Understory burns would be implemented in accordance with a specific prescription that defines the desired maximum flame lengths and fire spread rates based on the fuel types, weather, slopes, aspect, staffing levels, and containment lines and strategies set out in a burn plan. Interior portions of prescribed fires may exceed the prescribed flame lengths planned at the control lines, but the overall prescription would be designed to safely contain the fire within the planned fire perimeter. Burns could occur from September through July when conditions would be conducive to burning targeted fuels. Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments, including construction of handline, mow lines, or dozer lines.

Broadcast burning would require between 10 and 60 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 day to 2 weeks. Most burns would not exceed 90 acres in size, and many would be substantially smaller. Equipment would include water trucks, fire engines, and chainsaws. All burning would occur in accordance with regulations regarding the use of prescribed burning and pursuant to an approved burn plan.

### 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. Piles would be limited to 12 piles per acre in dry meadows, and pile burning would not occur in wet meadows or within Watercourse and Lake Protection Zones (WLPZs). Over the past century plus of fire exclusion, vegetation and stem densities have increased across all habitat types, including dry meadows. 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 approximately 5 feet by 5 feet in area and 5 feet in height and would be placed away from the dripline of trees and outside of special-status plant buffers.

## MECHANICAL TREATMENT

Mechanical treatments would occur on up to 7,500 acres of the 31,234 acres proposed for treatment over the 15- to 20-year implementation period and would primarily include understory thinning with a processing feller buncher, skidder, skid steer, or dozer; whole tree removal with an excavator for use in

fish habitat restoration projects; and in some cases masticating target vegetation to reduce ladder fuels and increase space between trees and chipping biomass from manual and mechanical treatment activities. No more than 800 acres would be treated using mechanical methods in any year. Excavators may be used where slopes are less than 15 percent. Equipment would include masticators, chippers (tracked and wheeled), and excavators (Table 1). Mechanical treatments would typically require between 1 and 50 crew members, and up to four crews. Generally, mechanical treatments would:

- remove ladder fuels less than 12 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;
- remove shrubs;
- prune lower branches of trees;
- masticate or chip biomass for disposal; and
- remove down logs.

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.

## MANUAL TREATMENT

Manual treatments would occur on up to 9,000 of the 31,234 acres proposed for treatment over the 15- to 20-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. Equipment would include chain saws, pole saws, weed trimmers, and other hand-operated tools (Table 1). Manual treatments would typically require between 1 and 50 crew members; however, crews would typically include between two and 10 personnel. Up to four crews could be working simultaneously. Generally, manual treatments would:

- remove ladder fuels less than 12 inches dbh;
- remove shrubs;
- prune up lower branches of trees;
- remove down logs; and
- 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.

## BIOMASS PROCESSING

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

- Masticating (5 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 6 inches in depth. Mastication treatment would only occur in areas approved by local Tribes.
- Chipping (5 percent of biomass): Chipped biomass would be spread over treatment areas and would not exceed 4 inches in depth in dry meadows, 2 inches in depth in wet meadows and riparian habitats, and 6 inches in depth in other habitats (i.e., forests, shrublands). Where feasible, chips would be hauled to approved disposal sites.

- Piling and Burning (85 percent of biomass): Pile burning may be used to dispose of slash, and chipped and masticated materials. Piles would be limited to 12 piles per acre in dry meadows. Piling would not occur in wet meadows or within WLPZs.
- Lop and Scatter (5 percent of biomass): Cut vegetation would be scattered within the treatment area.
- Invasive plant and noxious weed biomass would be treated onsite to eliminate seed and propagules or would 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 would not be chipped and spread, scattered, or mulched on site.

**9. Treatment Types**

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

**10. Treatment Activities**

☒ Prescribed (Broadcast) Burning, **28,000** acres
☒ Prescribed (Pile) Burning, **19,500** acres
☒ Mechanical Treatment, **7,500** acres
☒ Manual Treatment, **9,000** acres
☐ Prescribed Herbivory, **0** acres
☐ Herbicide Application, **0** acres

**11. Fuel Type**

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

**12. Geographic Scope**

☐ The treatment site is entirely within the CalVTP treatable landscape
☒ The treatment site is NOT entirely within the CalVTP treatable landscape

**13. Surrounding Land Uses and Setting:**

Land uses surrounding the project area include national forest land, federally designated wilderness, rural residential development, the Hoopa Valley Indian Reservation, other tribal land, and the Klamath River.

**14. Other public agencies whose approval is required**: (e.g., permits)

- Smoke management plan would be prepared for Siskiyou County Air Pollution Control District, when required
- Smoke management plan would be prepared for North Coast Unified Air Quality Management District, when required
- Burn permits from Siskiyou County Air Pollution Control District, when required
- Burn permits from North Coast Unified Air Quality Management District, when required
- Burn permits from CAL FIRE, when required

**15. Native American Consultation**. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation before the release of an environmental impact report, negative declaration, or mitigated negative declaration. For treatment projects that require additional CEQA review and documentation, have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts on tribal cultural resources, procedures regarding

confidentiality, etc.?
*Note: For treatment projects that are within the scope of this Program EIR, AB 52 consultation has been completed. The Board of Forestry and Fire Protection and CAL FIRE completed consultation pursuant to Public Resources Code section 21080.3.1 in preparation of the Program EIR.*

Pursuant to SPR CUL-2, Native American contacts in Humboldt and Siskiyou County were contacted on January 24, 2023, including four tribal representatives indicated by Mid Klamath Watershed Council's Contact List: Karuk Tribe, Yurok Tribe, Shasta Nation, and Shasta Indian Nation. No responses were received from any Native American tribes as of February 24, 2023.

**16. Use of PSA for 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) and treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) as implemented for the initial treatments. Retreatment would be dependent on regrowth conditions and would differ by location. As required by SPRs, retreatment would be implemented within a given vegetation type only if that vegetation type is outside of its natural fire return interval (i.e., time since last burn is greater than the average fire return interval for the habitat type). These intervals vary by vegetation type. Treatment activities that do not use fire (e.g., manual treatments, mechanical treatments) are considered "fire surrogates." In the absence of additional data regarding mechanical and manual treatment activities, fire return interval is used as a proxy for disturbance (e.g., manual treatment may be analogous to a low severity fire, mechanical treatment may be analogous to a mixed severity fire). Pursuant to SPR BIO-5, all treatments and the maintenance treatment interval will be designed to maintain habitat function of the specific chaparral vegetation alliance being treated and to avoid type conversion of chaparral. As a result, retreatment is generally anticipated to occur between 2 and 10 years following initial treatments in common vegetation types that are not sensitive natural communities or sensitive habitats (e.g., wetland, riparian, chaparral). Maintenance treatments would generally be at lower intensity and scale than initial treatments. Prior to implementing maintenance treatments, the project proponent will determine the natural fire return interval of the habitat(s) to be retreated.

Prior to implementing a maintenance treatment, the project proponent 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 if conditions have changed. 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 will be documented.

**17. Standard Project Requirements and Mitigation Measures.**

- ☒ All applicable SPRs and Mitigation Measures are feasible and will be implemented
- ☒ There is NO new information which would render mitigation measures previously considered infeasible or not considered in the CalVTP Program EIR now feasible OR such mitigation measures have been adopted. [Guidelines Sec.15162(a)(3); PRC Sec. 21166(c)]
- ☐ All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented (provide explanation)

Explanation: N/A

# DETERMINATION (To be completed by the CEQA lead agency)

**On the basis of this initial evaluation**:

☒ I find that all of the effects of the proposed project (a) have been analyzed adequately in the CalVTP Program EIR, (b) have been avoided or mitigated pursuant to the CalVTP Program EIR, and (c) all applicable mitigation measures and Standard Project Requirements identified in the CalVTP Program EIR will be implemented. The proposed project is therefore **WITHIN THE SCOPE** of the CalVTP Program EIR. NO ADDITIONAL CEQA DOCUMENTATION is required.

☒ I find that proposed project areas outside the CalVTP treatable landscape do not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an **ADDENDUM** is adopted to address the project areas outside the geographic extent presented in the Program EIR.

☐ I find that the proposed project will have effects that were not examined in the CalVTP Program EIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP Program EIR. A NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project will have effects that were not examined in the CalVTP Program EIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the CalVTP Program EIR, 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 environmental effects that were not examined in the CalVTP Program EIR. Because these effects are or may be significant and cannot be clearly mitigated, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature: DocuSigned by: John Melvin 6569EF653A04422... Date: 7/11/2023

Printed Name: John Melvin Title: Assistant Deputy Director

CALIFORNIA DEPARTMENT OF
FORESTRY AND FIRE PROTECTION (CAL FIRE)

Agency

# EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for each Impact, SPR and mitigation measure identified in the PSA/Addendum Checklist. The information provides clarity for review and/or provides direction to the field staff that will implement the project utilizing the checklist (persons familiar with the project and preparation of the document may be different through the life span of the document). Answers should consider whether the proposed project would result in new or more substantial environmental effects than described in the CalVTP Program EIR, after incorporation of applicable SPRs and mitigation measures required by the CalVTP Program EIR.
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP Program EIR for each environmental topic.
3. Once the project proponent has evaluated the environmental effect that may occur, then the checklist answers must indicate whether the impact is:

   (Definitions located in Chapter 3 – "Environmental Settings, Impacts, and Mitigation Measures, 3.1.4 – Terminology Used In the Program EIR")

   - **Less Than Significant (LTS)** - An impact either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible mitigation measures.
   - **Less Than Significant *with* Mitigation (LTSM)** - An impact was identified within the Program EIR which was viewed in totality as potentially significant and/or significantly unavoidable and the mitigation measures and SPRs and mitigation measures provided in the Program EIR will be implemented mitigating to a point of less than significance.
   - **Potential Significant (PS)** - An impact treated as if it were a significant impact. "Potentially" is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this Program EIR.
   - **Potentially Significant and Unavoidable (PSU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. "Potentially" is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in the Program EIR
   - **Significantly Unavoidable (SU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
   - **Not applicable (N/A)**
     If the impact is equal to or less than the impact identified in the Program EIR, the Program EIR can be utilized without a Negative Declaration, Mitigated Negative Declaration or EIR. If there are one or more entries where the impact is evaluated to be greater than the impact in the Program EIR, additional documentation is required.
4. Where a Negative Declaration, Mitigated Negative Declaration is required, the environmental review would be guided by the directions for use of the Program EIR with later activities in Section 15168. Where an EIR is required, the environmental review would be guided by Sections 15162 and 15163. When preparing any environmental document, the environmental analysis may incorporate by reference the analysis from the CalVTP Program EIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP Program EIR.
5. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

6. Standard Project Requirements (SPRs) and Mitigations Measures.

   - **Applicable (Yes/No).** Document whether the SPR or mitigation measure is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
   - **Implementing Entity.** The implementing entity is the individual or organization responsible for carrying out the requirement. This could include the 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. For this project, the implementing entity will be Mid Klamath Watershed Council.
   - **Verifying/Monitoring Entity.** The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity and is typically the CEQA lead or responsible agency. CAL FIRE's discretionary approval is to provide grant funding and Mid Klamath Watershed Council will be implementing treatments and associated SPRs and mitigation measures. Therefore, as used in this PSA/Addendum, unless otherwise noted, Mid Klamath Watershed Council is the verifying/monitoring entity.

   **NOTE**: the cited SPRs and mitigation measures are summarized to manage the template's size. Refer to the approved CalVTP language attached for the full list of requirements.

# EC-1: AESTHETICS AND VISUAL RESOURCES

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **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 | Impact AES-1, 3.2 | LTS | SPR AES-2<br>SPR AQ-2, 3<br>SPR REC-1<br>SPR AD-3<br>SPR AD-4 | Yes | LTS | ☒ |

Treatment activities will be conducted within private properties in western Siskiyou and eastern Humboldt counties. The project area is located near portions of State Route (SR) 96, This highway may provide public viewpoints of the project area. The proposed treatments may be visible from SR 96, which is an eligible but not officially designated state scenic highway (Caltrans 2022). The Siskiyou County General Plan, Scenic Highways Element, identifies SR 96 from Interstate (I-) 5 along the Klamath River to the western Siskiyou County line as a scenic highway (Siskiyou County 1975). Although no highways in the Humboldt County are officially designated state scenic highways, the following state highway is eligible for official designation according to the Humboldt County General Plan: SR 96 from SR 299 at Willow Creek north to Siskiyou County (Humboldt County 2017a). Recreational areas in the vicinity of and serving the project area include Klamath National Forest, Six Rivers National Forest, and Marble Mountain Wilderness Area. The project area is surrounded almost entirely by US Forest Service land (Klamath National Forest and Six Rivers National Forest), which provides many recreational activities, including hiking, campgrounds, dispersed camping, and off-highway vehicle touring. The campgrounds nearest to the treatment areas include Fish Lake Campground, Red Bank Campground, Oak Bottom Campground, Dillon Creek Campground, Grider Creek Campground, and Fort Goff Campground. The trailheads nearest to the treatment areas include Taylor Lake Trailhead, Music Creek Trailhead, and Wooley Creek Trailhead. The Pacific Crest Trail also intersects a portion of the project area. Other recreational areas within the project area include the Pacific Coast Ranges, which are located approximately five miles north of Happy Camp. Although there would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway, proposed treatments including equipment and smoke from prescribed burning may be visible from the various recreational trails and SR 96, while the treatments are being implemented. The potential for the proposed treatments to result in degradation of the visual character of an area and degradation of public viewpoints was examined in the Program EIR. 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 Program EIR because the proposed treatment activities and types of visual effects are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 short-term aesthetic impact is also the same, as described above. In addition, Mid Klamath Watershed Council proposes to revise SPR AQ-2 to conduct prescribed burning in compliance with the burn authorization program of the applicable air district and would submit a smoke management plan for all prescribed burns when required by the applicable air district, in accordance with 17 CCR Section 80160. There are no functional changes to the original requirements of SPR AQ-2 with the proposed revisions; they would prepare and

submit smoke management plans to the air district when required for prescribed burning. Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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.

In addition, CAL FIRE determined that SPR AD-4 is applicable to this short-term impact. Revisions to this SPR are proposed 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. Mid Klamath Watershed Council 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. 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.

For these reasons, proposed revisions to SPRs AQ-2, AQ-3, and AD-4 would not result in a substantially more severe significant effect related to short-term degradation of public views than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **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 | Impact AES-2, 3.2 | LTS | SPR AES-1<br>SPR AES-3<br>SPR AD-3 | Yes | LTS | ☒ |

Initial and maintenance treatments would include WUI fuel reduction and ecological restoration treatment types. The project is located on private land and is not visible from any officially designated state scenic highways (Caltrans 2022). However, proposed treatment areas, specifically the change in vegetation post-treatment, may be visible from publicly accessible trails and scenic vistas within Klamath National Forest, Six Rivers National Forest, and Marble Mountain Wilderness Area as well as from SR 96 and SR 3, which are eligible state scenic highways. Therefore, although there would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway, there could be long-term degradation of visual character or quality of public views as a result of vegetation removal. The potential for the proposed treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR. The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment types and related visual effects are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above.

The proposed treatments would be consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR. Anecdotal observations associated with past similar treatments within the project area have indicated that residents view these treatments as an improvement to the visual character of the project area. Views into the forest understory and across restored meadow habitats improve hunting and gathering practiced by tribal members still inhabiting their ancestral territory, and non-native residents have expressed feeling safer knowing their egress routes are less vulnerable to stand-replacing wildfires.

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| **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 | Impact AES-3, 3.2 | SU | MM AES-3 | No | N/A | ☒ |

This impact does not apply to the proposed project because non-shaded fuel breaks are not proposed.

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| **Other Impacts on Aesthetics:** Would the project result in other impacts on aesthetics that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. 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.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
|---|---|---|---|
| **SPR AES-1 Vegetation Thinning and Edge Feathering:** This SPR only applies to mechanical and manual treatment activities within all treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

PRIOR – Pre-field work to determine treatment types and boundaries will consider topographical features with the intent to create irregular vegetation densities and treatment area size to mimic natural conditions.

DURING – If there are areas within the mechanical treatment areas that cannot be completed with the use of equipment due to equipment limitations, they will be treated with manual treatment methods.

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| **SPR AES-2 Avoid Staging within Viewsheds:** This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

Although the project area is mostly within private lands, treatment activities may be visible from publicly accessible trails and scenic vistas within Klamath National Forest, Six Rivers National Forest, and Marble Mountain Wilderness Area as well as from SR 96. Equipment staging areas will be located away from these publicly accessible trails and public roadways.

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| **SPR AES-3 Provide Vegetation Screening:** This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

This project is located within private lands and treatments would predominantly occur outside of public viewsheds. Vegetation screening will be provided where necessary in areas visible to the public, mainly along publicly accessible trails and scenic vistas within Klamath National Forest, Six Rivers National Forest, and Marble Mountain Wilderness Area as well as from SR 96.

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| **MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks** | No | N/A | N/A |

This mitigation measure does not apply to the proposed project because non-shaded fuel breaks are not proposed - refer to Impact AES-3.

# EC-2: AGRICULTURE AND FOREST RESOURCES

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact AG-1:** Result Directly 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 | Impact AG-1, 3.3 | LTS | SPR AD-3 | Yes | LTS | ☒ |

The proposed treatments would include ecological restoration and WUI fuel reduction treatments through use of prescribed burning, mechanical treatments, and manual treatments. Throughout the project area, ecological restoration treatments would occur in several vegetation types: conifer forest, hardwood forest, and montane hardwood-conifer that could be considered forest land as defined in PRC 12220(g). The potential for these treatment types and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use was examined in the Program EIR. Treatment activities implemented through ecological restoration and WUI fuel reduction would involve alteration of forest land though vegetation removal. The vegetation remaining after treatment would be consistent with the definition of forest land as defined in PRC 12220(g). Forest land is defined as land that can support 10 percent native tree cover of any species under natural conditions. 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 Program EIR. However, within the boundary of the project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact on forest land is substantially the same as described in the Program EIR. Therefore, the project would not constitute a substantially more severe significant impact than was analyzed in the Program EIR.

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| **Other Impacts on Agriculture and Forest Resources:** Would the project result in other impacts on agriculture and forest resources that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. 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 proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the Program EIR.

# EC-3: AIR QUALITY

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact AQ-1**: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS | Impact AQ-1, 3.4 | PSU | SPR AD-4 SPR AQ-1, 2, 3, 4, 5, 6 MM AQ-1 | Yes | SU | ☒ |

Use of vehicles, mechanical equipment, and prescribed burning during treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) thresholds. The proposed project is within the jurisdiction of the Siskiyou County Air Pollution District and the North Coast Unified Air Quality Management District, and permits will be obtained from these agencies prior to burning. These agencies will not issue permits to burn if they believe there is a potential for significant smoke impacts to sensitive receptors in communities within the project area. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects. Emissions of criteria air pollutants related to the proposed treatment would be significant and are within the scope of the impacts addressed in the Program EIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins 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. In addition, Mid Klamath Watershed Council proposes to

revise SPR AQ-2 to conduct prescribed burning in compliance with the burn authorization program of the applicable air district and would submit a smoke management plan for all prescribed burns when required by the applicable air district, in accordance with 17 CCR Section 80160. There are no functional changes to the original requirements of SPR AQ-2 with the proposed revisions; smoke management plans would be prepared and submitted to the air district when required for prescribed burning. Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. Mid Klamath Watershed Council proposes to also 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 Program EIR. 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. To maintain personnel and public safety, Mid Klamath Watershed Council proposes to revise SPR AQ-6 to prepare Incident Action Plans 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 covey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement a IAP and all required burn safety procedures. In addition, Mid Klamath Watershed Council proposes to revise SPR AD-4 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. Mid Klamath Watershed Council 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. 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. For the reasons described, proposed revisions to SPR AQ-2, AQ-3, AQ-4, AQ-6, and AD-4 would not result in a substantially more severe significant effect related to emissions of criteria air pollutants than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

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| **Impact AQ-2:** Expose People to Diesel Particulate Matter Emissions and Related Health Risk | Impact AQ-2, 3.4 | LTS | SPR AQ-1<br>SPR HAZ-1<br>SPR NOI-4, 5 | Yes | LTS | ☒ |

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 was examined in the Program EIR. The proposed treatments would occur over a short duration and would neither occur in the same area, nor expose the same people to particulates for an extended period of time. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, 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 Program EIR. 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 Program EIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact AQ-3**: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk | Impact AQ-3, 3.4 | LTS | SPR AQ-1, 4, 5 | Yes | LTS | ☒ |

Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground disturbing activities. The potential to expose people to naturally occurring asbestos (NOA)-containing fugitive dust emissions was examined in the Program EIR. Most of the treatment areas are not located on soil types where NOA would be present; however, portions of the project area are underlain by serpentine soils (NRCS 2022). In accordance with SPR AQ-5, no treatments would occur in these areas unless an Asbestos Dust Control Plan is prepared as required by 17 CCR Section 93105. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the Program EIR because the exposure potential and avoidance of treatments in NOA-containing areas is consistent with the impacts analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 air quality impact is also the same, as described above. In addition, Mid Klamath Watershed Council 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 Program EIR. 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 this reason, proposed revisions to SPR AQ-4 would not result in a substantially more severe significant effect related to exposing people to fugitive dust emissions containing NOA than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact AQ-4**: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk | Impact AQ-4, 3.4 | PSU | SPR AD-4 SPR AQ-1, 2, 6 | Yes | SU | ☒ |

Prescribed burn treatments could expose people to toxic air contaminants. The potential for prescribed burning to expose people to toxic air contaminants was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of toxic air contaminants and associated levels of acute health risk with a Hazard Index greater than 1.0. The duration and parameters of the pile and broadcast burn treatments would be significant and are within the scope of the activities addressed in the Program EIR; therefore, the potential for exposure to toxic air contaminants is also within the scope of impacts covered in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins 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. In addition, Mid Klamath Watershed Council proposes to revise SPR AQ-2 to conduct prescribed burning in compliance with the burn authorization program of the applicable air district and would submit a smoke management plan for all

prescribed burns when required by the applicable air district, in accordance with 17 CCR Section 80160. There are no functional changes to the original requirements of SPR AQ-2 with the proposed revisions; they would prepare and submit smoke management plans to the air district when required for prescribed burning. To maintain personnel and public safety, Mid Klamath Watershed Council also proposes to revise SPR AQ-6 to prepare Incident Action Plans 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 covey 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. In addition, Mid Klamath Watershed Council proposes to revise SPR AD-4 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. Mid Klamath Watershed Council 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. 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. For the reasons described, proposed revisions to SPR AQ-2, AQ-6, and AD-4 would not result in a substantially more severe significant effect related to exposing people to toxic air contaminants than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

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| **Impact AQ-5**: Expose People to Objectionable Odors from Diesel Exhaust | Impact AQ-5, 3.4 | LTS | SPR AQ-1<br>SPR HAZ-1<br>SPR NOI-4, 5 | Yes | LTS | ☒ |

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose human receptors to the objectional odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the Program EIR. The release of objectional odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the air quality conditions, and sensitive receptors present 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact AQ-6**: Expose People to Objectionable Odors from Smoke During Prescribed Burning | Impact AQ-6, 3.4 | PSU | SPR AD-4<br>SPR AQ-1, 2, 6 | Yes | SU | ☒ |

Pile burning and broadcast burn treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. The duration and parameters of the prescribed burning treatments would be significant and are within the scope of the activities addressed in the Program EIR; therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the air quality conditions present and sensitive receptors 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. In addition, Mid Klamath Watershed Council proposes to revise SPR AQ-2 to conduct prescribed burning in compliance with the burn authorization program of the applicable air district and would submit a smoke management plan for all prescribed burns when required by the applicable air district, in accordance with 17 CCR Section 80160. There are no functional changes to the original requirements of SPR AQ-2 with the proposed revisions; they would prepare and submit smoke management plans to the air district when required for prescribed burning. To maintain personnel and public safety, Mid Klamath Watershed Council also proposes to revise SPR AQ-6 to prepare Incident Action Plans 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 covey prescribed fire objectives. This revision is consistent with the purpose of SPR AQ-6 to prepare and implement a IAP and all required burn safety procedures. In addition, Mid Klamath Watershed Council proposes to revise SPR AD-4 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. Mid Klamath Watershed Council 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. 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. For the reasons described, proposed revisions to SPR AQ-2, AQ-6, and AD-4 would not result in a substantially more severe significant effect related to exposing people to objectionable odors than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

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| **Other Impacts on Air Quality**: Would the project result in other impacts on air quality that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.4.1, “Regulatory Setting,” and Section 3.4.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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; 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 Program EIR. 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 air quality would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR AQ-1 Comply with Air Quality Regulations:** This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

All pile and broadcast burns are required to comply with applicable air quality regulations for the air district with jurisdiction in the project area. A Smoke Management Plan will be submitted to the Siskiyou County Air Pollution District and the North Coast Unified Air Quality Management District prior to burning and a burn permit from the Siskiyou County Air Pollution District and the North Coast Unified Air Quality Management District will be obtained, as applicable.

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| **SPR AQ-2 Submit Smoke Management Plan:** This SPR applies only to prescribed burning treatment activities and all treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The project proponent will prepare a Smoke Management Plan to be submitted to the Siskiyou County Air Pollution District and the North Coast Unified Air Quality Management District prior to treatments, as required.

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| **SPR AQ-3 Create Burn Plan:** This SPR applies only to prescribed burning treatment activities and all treatment types**.** [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The project proponent will create a burn plan using burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent, for all prescribed burns.

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| **SPR AQ-4 Minimize Dust:** This SPR applies to all treatment activities and treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

To minimize dust during treatment activities, the project proponent will implement the measures listed in under SPR AQ-4 in Attachment A.

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| **SPR AQ-5 Avoid Naturally Occurring Asbestos:** This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

NOA is mapped in the project area. No treatments would occur in these areas unless an Asbestos Dust Control Plan is prepared as required by 17 CCR Section 93105.

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| **SPR AQ-6: Prescribed Burn Safety Procedures:** An Incident Action Plan (IAP) will be prepared for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types**.** [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Incident Action Plan 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 Incident Action Plan will also identify personnel to coordinate with at the local CAL FIRE battalion and dispatch, and at the appropriate air district office for onsite briefings, posting notifications, and weather monitoring during burning.

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| **MM 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. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Where feasible, the project proponent will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. The components of Mitigation Measure AQ-1 that have been determined to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment rather than diesel-powered equipment, encouraging carpooling to the project area, and using Best Available Control Technology for emission reductions of $NO_X$ and PM on equipment. Equipment meeting Tier 4 emission standards and the use of renewable diesel fuel would be implemented to the extent feasible.

# EC-4: ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact CUL-1**: Cause a Substantial Adverse Change in the Significance of Built Historical Resources | Impact CUL-1, 3.5 | LTS | SPR AD-3 SPR CUL-1, 7, 8 | Yes | LTS | ☒ |

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. The results of the records search at the Northwest Information Center (NWIC) for the Humboldt County portion of the project area and at the Northeast Information Center (NEIC) for the Siskiyou County portion of the project area. The NWIC search identified one built environment feature which is California Register of Historical Resources (CRHR)-eligible, while the NEIC search identified 42 built environment features, of which two are CRHR-eligible. Built environment features that are CRHR-eligible are considered resources under CEQA and will be avoided. The other features have not been evaluated for eligibility; therefore, it is not known if they are considered resources under CEQA. Additional structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area, and these structures would be identified and avoided. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact CUL-2**: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources | Impact CUL-2, 3.5 | SU | SPR AD-3 SPR CUL-1, 2, 3, 4, 5, 8 MM CUL-2 | Yes | SU | ☒ |

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The NWIC

records search revealed two precontact isolates, two precontact sites and one trail, and four historic-era archaeological sites; however, none of these have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. The NEIC records search revealed one precontact isolate and one historic-era archaeological isolate, 40 precontact sites, 77 historic-era archaeological sites, and 13 multi-component sites (meaning the site had both precontact and historical-era features). Three of the multi-component sites and one of the precontact sites are CRHR-eligible and therefore considered resources under CEQA.

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the Program EIR. This impact was identified as significant and unavoidable in the Program EIR because of the large geographic extent of the treatable landscape and the possibility that there could be some rare instances where inadvertent damage of unknown resources may be extensive. The project requires identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse change in the significance of any unique archaeological resources or subsurface historical resources. However, given the uncertainty regarding the potential extent of damage during inadvertent excavation of an unknown resource, if it occurred, this impact would remain significant and unavoidable, as explained in the Program EIR. This impact is within the scope of the Program EIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. In addition, Mid Klamath Watershed Council has knowledge of and established relationships with geographically affiliated Tribes and therefore proposes to revise SPR CUL-2 to use their own tribal contact list in place of the NAHC's list and notify the specific tribes with known affiliation with the project area. This revision is consistent with the purpose of SPR CUL-2 to notify the California Native American Tribes about a proposed project that are geographically affiliated with the project area. Furthermore, tribal input is more likely to be received if there is an established, working relationship with the tribe being contacted about the project, which is the intent of SPR CUL-2. For these reasons, proposed revisions to SPR CUL-2 would not result in a substantially more severe significant effect to archaeological resources than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact CUL-3**: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource | Impact CUL-3, 3.5 | LTS | SPR CUL-1, 2, 3, 4, 5, 6, 8 | Yes | LTS | ☒ |

Native American contacts in Humboldt and Siskiyou counties (i.e., Karuk Tribe, Yurok Tribe, Shasta Nation, Shasta Indian Nation) were contacted on January 24, 2023. No responses were received from any Native American tribes as of February 24, 2023. The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the Program EIR. This impact is within the scope of the Program EIR because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the Program EIR. As explained in the Program EIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs, which may be tailored to the tribal cultural resources in the project area in coordination with tribes, would avoid any substantial adverse change to any tribal cultural resource. In addition, Mid Klamath Watershed Council has knowledge of and established relationships with geographically affiliated Tribes and therefore proposes to revise SPR CUL-2 to use their own tribal contact list in place of the NAHC's list and notify the specific tribes with known affiliation with the project area. This revision is consistent with the purpose of SPR CUL-2 to notify the California Native American Tribes about a proposed project that are geographically affiliated with the project area. Furthermore, tribal input is more likely to be received if there is an established, working relationship with the tribe being contacted about the project, which is the intent of SPR CUL-2. For these reasons, proposed revisions to SPR CUL-2 would not result in a substantially more severe significant effect to tribal cultural resources than what was covered in the Program EIR. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact CUL-4**: Disturb Human Remains | Impact CUL-4, 3.5 | LTS | SPR AD-3 | Yes | LTS | ☒ |

Vegetation treatment activities would include treatments using heavy equipment; these treatments may use masticators, excavators, and tracked chippers, which could uncover human remains. The NIC records search did reveal known cemeteries and burial areas. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR, because the intensity of ground disturbance under the proposed project is consistent with what was analyzed in the Program EIR. In addition, consistent with the Program EIR, the proposed project would comply with California Health and Safety Code Sections 7050.5 and Public Resources Code Section 5097 in the event of a discovery. No SPRs are applicable to this impact. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Archeological, Historical, and Tribal Cultural Resources**: Would the project result in other impacts on archeological, historical, or tribal cultural resources that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. CAL FIRE 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 CalVTP Program EIR (refer to Section 3.5.1, “Environmental Setting,” and Section 3.5.2, “Regulatory Setting,” in Volume II of the Final Program EIR).

Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, 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 proposed treatment project are also consistent with those covered in the Program EIR. Revisions to SPR CUL-2 would not cause impacts in addition to those discussed in the Program EIR. No changed circumstances are present, therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR CUL-1 Conduct Record Search:** For treatments led by CAL FIRE, an archaeological and historical resource record search will be conducted per the “Archaeological Review Procedures for CAL FIRE Projects” (current edition dated 2010). This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Consistent with SPR CUL-1, a records search of the Humboldt County portion of the project area was performed by NWIC. Results for 42 resources were returned on November 17, 2022 (NWIC File No.: 22-0634). The results identified one historical resource (a bridge), two precontact isolates, two precontact sites and one trail, and four historic-era archaeological sites (mine tailings, building foundations, trash scatters). Although the project site is fully located on private property, it is surrounded entirely by federal land and based on slight mapping inconsistencies, the NWIC search identified an additional 32 resources on federal land. No site records were provided for these resources, however, for the purposes of this project, none of those resources would be affected.

A records search of the Siskiyou County portion of the project area was performed by NEIC. Results for 174 resources were returned on November 1, 2022 (IC File No.: D22-385). The results identified 42 built environment features (single family residences, barns, churches, schools), one precontact isolate and one historic-era archaeological isolate, 40 precontact sites (obsidian flakes, milling tools, village sites, ceremonial sites, burials, habitation sites, pit houses, midden, trails), 77 historic-era archaeological sites (foundations, domestic refuse, mining features, cemeteries, mill sites, trail segments, water conveyance features), and 13 multi-component sites (meaning the site had both precontact and historical-era features). Similar to the NWIC search, some of these resources are located on federal land. However, for the purposes of this project, none of those resources would be affected.

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| **SPR CUL-2 Contact Geographically Affiliated Native American Tribes:** The project proponent will notify the specific tribes with known affiliation with the project area. This SPR applies to all treatment activities and treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Due to the large project area, a search of the NAHC's sacred lands database was not conducted; a positive result would not return any specific information or location. On January 24, 2023, letters inviting the tribes to consult were mailed to the four tribal representatives indicated by Mid Klamath Watershed Council's Contact List, consistent with SPR CUL-2 (i.e., Karuk Tribe, Yurok Tribe, Shasta Nation, Shasta Indian Nation). These letters identified the location, treatment types, purpose of the treatments, and requested information concerning the location of any cultural resources that may exist within the project area. No responses were received from any Native American tribes within the 30-day window within which a response was requested.

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| **SPR-CUL-3 Pre-field Research:** The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Pre-field research included review of site records from the NWIC and NEIC. The site records and reference materials will again be reviewed prior to the archaeological survey.

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| **SPR CUL-4 Archaeological Surveys:** The project proponent will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

An archaeological survey will be conducted for the project area by an archaeologically trained resource professional or qualified archaeologist prior to the start of treatments.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Identified resources will be avoided. Notification letters will be sent to culturally affiliated tribes if cultural resources are identified that cannot be avoided.

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| **SPR CUL-6 Treatment of Tribal Cultural Resources:** If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Identified resources will be avoided. In consultation with culturally affiliated tribes, effective protection measures will be developed for tribal cultural resources that cannot be avoided.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The NWIC search identified one built environment feature which is CRHR-eligible, while the NEIC search identified 42 built environment features, of which two are CRHR-eligible. Additional built environment historical resources, if present within the project area, will be avoided during project implementation.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

Mid Klamath Watershed Council will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological or tribal cultural resources prior to the start of treatments.

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| **MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources**<br>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 professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Should project activities reveal cultural or archaeological resources, CAL FIRE's standard post-review discovery procedures will be implemented, which require work to cease within 100 feet of the discovery and the Unit Archaeologist and Unit Forester to be contacted. Work will not resume until direction is provided by the Archaeologist.

# EC-5: BIOLOGICAL RESOURCES

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact BIO-1:** Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications | Impact BIO-1, 3.6 | LTSM | SPR AD-1 SPR BIO-1, 2, 7, 9 SPR AQ-3, 4, SPR GEO-1, 3, 4, 5, 7 SPR HYD-5 MM BIO-1a, 1b, 1c | Yes | LTSM | ☒ |

Initial and maintenance treatment activities (i.e., prescribed burning, mechanical treatments, and manual treatments) could adversely affect special-status plant species (see Attachment B for detailed information). The potential for treatment activities to result in adverse effects on special-status plant species was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR because the proposed treatment types and activities and the intensity of disturbance that would result from implementing the proposed treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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, Mid Klamath Watershed Council 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. Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. Mid Klamath Watershed Council proposes to also 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

Program EIR. 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 Program EIR.

This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-2**: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications | Impact BIO-2, 3.6 | LTSM /PSU (all wildlife species except bumble bees – LTSM) (bumble bees-PSU) | SPR AD-1 SPR BIO-1, 2, 3, 4, 5, 8, 10, 11 SPR HYD-1, 3, 4, 5 SPR HAZ-5, 6 MM BIO-2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 3a, 3b, 3c, 4 | Yes | LTSM | ☒ |

Initial and maintenance treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) could disturb, cause injury or mortality to, or degrade or remove habitat for some special-status wildlife species (see Attachment B for detailed information). The potential for treatment activities to adversely affect special-status wildlife was examined in the Program EIR.

The Program EIR concluded that impacts on special-status bumble bees would be potentially significant and unavoidable, because it addressed the entirety of the treatable landscape across the state and significant impacts could not be ruled out. Addressing this potential effect at a project-specific level may result in a different significance conclusion, if supported by evidence. Mid Klamath Watershed Council and Ascent discussed with CDFW and USFWS methods to avoid take and maintain habitat function on May 10, 2023, and May 9, 2023, respectively. Both agencies provided input and standards for limited operating periods for applicable treatment types and locations to reduce potential adverse effects on Franklin's bumble bee, western bumble bee, and Suckley's cuckoo bumble bee, which are incorporated into the project-specific refinements to SPR BIO-1, SPR BIO-10, and Mitigation Measure BIO-2a for these species (see Attachment A, Standard Project Requirements and Mitigation Measures). Therefore, and pursuant to this guidance from USFWS and CDFW, take as defined under ESA and CESA is considered to be unlikely during implementation of the proposed treatments. Additionally, Mid Klamath Watershed Council follows preventative measures based on the traditional ecological knowledge of the Karuk Tribe that once flowering shrub species such as manzanita have flowered in late winter and early spring, bumble bees have emerged from the oak litter sometimes used for hibernation by some bumble bee species in the Western Klamath Mountains. Burning in oak litter will not commence until after the manzanita have flowered.

Franklin's bumble bee, Suckley's cuckoo bumble bee, and western bumble bee are very unlikely to occur in the project area (as described in Attachment B). For Franklin's bumble bee, in areas identified by USFWS as high priority zones for the species, a limited operating period for mechanical treatment or prescribed burning in meadows from May 15 to September 30 (i.e., the flight/colony/nesting season for the species) would be implemented. If the limited operating period for Franklin's bumble bee is determined to be infeasible for certain treatments and meadow sites within USFWS-defined high priority zones while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, then SPR BIO-10 will be implemented

to determine presence or absence of Franklin's bumble bee through surveys, in coordination with the USFWS Yreka office, and confirm the applicability of the limited operating period.

For western bumble bee and Suckley's cuckoo bumble bee, a limited operating period for mechanical treatment or prescribed burning in meadows from May 15–August 31 would be implemented, if feasible. If the limited operating period for western bumble bee and Suckley's cuckoo bumble bee is determined to be infeasible for certain treatments and meadow sites while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, Mid Klamath Watershed Council may consult with CDFW on a site- or treatment-specific basis to further evaluate whether the limited operating period would be required for a specific meadow site and treatment prescription. If the limited operating period is determined to be required for meadows occupied or potentially occupied by Suckley's cuckoo bumble bee, Mid Klamath Watershed Council will either: 1) initially implement the limited operating period without further review, or 2) implement SPR BIO-10, which requires surveys to determine presence or absence and confirm the applicability of required protection measures (e.g., the limited operating period) based on presence or absence of the species. Further, as required under Mitigation Measures BIO-2a and BIO-2g, measures to minimize and avoid impacts on special-status bumble bees and bumble bee habitat would be implemented, if applicable. These measures are described in detail in Attachment A (Standard Project Requirements and Mitigation Measures).

Additionally, Mitigation Measure BIO-2g would be implemented to reduce impacts on bumble bees and their habitat. Finally, habitat function would be maintained for all special-status bumble bee species (as described in Attachment B). For these reasons, it is unlikely that populations of these species would be reduced below self-sustaining levels as a result of implementation of the proposed project or that treatment activities would substantially reduce the number or restrict the range of species. Therefore, this impact would be less than significant. As described above, USFWS and CDFW provided information to avoid or minimize any likelihood of take and raised no concerns that take would be likely or concerns about maintenance of habitat function; although coordination with these agencies was conducted under the purview of ESA and CESA, respectively, the outcome supports the determination that this impact would be less than significant under CEQA, and less severe than considered at the statewide level in the Program EIR.

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 Program EIR. 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize adverse impacts in WLPZs. For these reasons, proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect on special-status wildlife than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-3**: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function | Impact BIO-3, 3.6 | LTSM | SPR AD-1<br>SPR BIO-1, 2, 3, 4, 5, 6, 8, 9<br>SPR HYD-4, 5<br>MM BIO-3a, 3b, 3c | Yes | LTSM | ☒ |

Initial and maintenance treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat, sensitive natural communities, wetlands, and chaparral habitat (see Attachment B for detailed information). The potential for treatment activities, including maintenance treatments, to result in adverse effects on sensitive habitats was examined in the Program EIR. This impact on sensitive habitats is within the scope of the Program EIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

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 Program EIR. 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize negative impacts in WLPZs. For these reasons, proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect to riparian habitat than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-4**: Substantially Affect State or Federally Protected Wetlands | Impact BIO-4, 3.6 | LTSM | SPR AD-1<br>SPR BIO-1<br>SPR HYD-1, 3, 4<br>MM BIO- 4 | Yes | LTSM | ☒ |

Initial and maintenance treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) could result in direct or indirect adverse effects on state or federally protected wetlands. An aquatic resource delineation has not been conducted in the project area; however, wetlands are mapped in the treatment area at a coarse scale by the National Wetlands Inventory (NWI) (USFWS 2022a) using aerial imagery. Additional wetlands may be present throughout the project area that have not been identified or mapped in the NWI, as well as ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, seeps, and other aquatic resources. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR. 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, reservoirs, freshwater emergent wetlands, and forested/shrub wetland features. This impact on wetlands is within the scope of the Program EIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR.

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 Program EIR. However, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wetlands is also the same, as described above. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose

of SPR HYD-4 to avoid and minimize adverse impacts in WLPZs. For these reasons, proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect on wetlands than what was covered in the Program EIR. Mid Klamath Watershed Council also proposes to revise Mitigation Measure BIO-4 to allow for use of propane torches and traditional methods of ignition within wetland buffers. Proposed revisions to Mitigation Measure BIO-4 could result in impacts on state or federally protected wetlands if present within meadows; however, the project proponent would still be required to implement SPRs and mitigation measures to reduce impacts on these resources within meadow habitats. Most of the meadow habitat in the project area is fresh emergent wetland habitat, which may qualify as state or federally protected wetlands. 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. As described above, ignition within wetland buffers in meadow habitats using only propane torches and traditional methods would not result in ground disturbance, erosion, or introduction of chemicals into wetlands. Therefore, proposed revisions of Mitigation Measure BIO-4, specifically for broadcast burning in meadows, would not result in a new or substantially more severe significant effect on wetlands not addressed in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-5**: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries | Impact BIO-5, 3.6 | LTSM | SPR AD-1<br>SPR BIO-1, 4, 5, 10, 11<br>SPR HYD-1, 4<br>MM BIO-5 | Yes | LTSM | ☒ |

Treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) could disturb wildlife movement corridors and nursery sites. The potential for treatment activities to adversely affect wildlife movement corridors and nursery sites was examined in the Program EIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), a large essential connectivity area is mapped west and north of SR 96 in an east to west orientation, connecting natural landscape blocks in eastern Siskiyou County, north of Seiad Valley, and west of the project area to the coast (CDFW 2022). An additional essential connectivity area is mapped within the project area in a north to south orientation, connecting natural landscape blocks north of Seiad Valley to natural landscape blocks in the Marble Mountain Wilderness Area and near the Salmon River (CDFW 2022). Additional essential connectivity areas and natural landscape blocks are present on all sides of the project area (CDFW 2022). Portions of the project area not included in essential connectivity areas or natural landscape blocks contain natural habitat and are likely used as wildlife movement corridors to some degree, especially streams and associated riparian corridors.

WUI fuel reduction treatments would occur near existing roads and residences. The size and traffic level of the roads and level of development within residential areas varies; however, these areas generally are subject to ongoing disturbances (e.g., vehicle traffic, human activity) and some level of wildlife habitat fragmentation due to historic urban, residential, and agricultural development of the region. While habitat directly adjacent to development would not be considered optimal habitat, wildlife may move through these areas, or use some habitats for cover or as nursery sites, especially in relatively undeveloped areas.

SPRs would limit the extent of treatment activities within and otherwise maintain the function of habitat that could function as a wildlife movement corridor. If nesting birds and wildlife nursery sites are identified, no-disturbance buffers would be established pursuant to SPRs and mitigation measures. Additionally, implementation of proposed treatments would not result in any conversion of land cover or create new barriers to wildlife movements within (locally) or across (regionally) the project area. With implementation of SPRs, habitat function within the project area would be maintained and there would not be a substantial change in the existing conditions that facilitate wildlife movement in the project area.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR. This impact is within the scope of the Program EIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize adverse impacts in WLPZs. For these reasons, proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect on wildlife movement corridors than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-6**: Substantially Reduce Habitat or Abundance of Common Wildlife | Impact BIO-6, 3.6 | LTS | SPR AD-1 SPR BIO-1, 2, 3, 4, 5, 12 | Yes | LTS | ☒ |

Initial treatment and maintenance treatments (i.e., prescribed burning, mechanical treatments, manual treatments) could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for nesting birds and other common wildlife is present throughout the project area. Treatment activities, including prescribed burning, mechanical treatments, and manual treatments conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. SPRs would be implemented to protect common nesting birds during treatment activities. In the long-term, the proposed treatments may benefit many common wildlife species and associated habitat, which have evolved with frequent fire on the landscape. Additionally, vegetation treatments are intended to reduce the occurrence of extreme wildfires, which can result in loss of wildlife habitat and injury or mortality of individuals.

The potential for treatment activities to disturb or remove habitat for nesting birds and other common wildlife was examined in the Program EIR. The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the Program EIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-7**: Conflict with Local Policies or Ordinances Protecting Biological Resources | Impact BIO-7, 3.6 | No Impact | SPR AD-1, 3 | Yes | No Impact | ☒ |

Applicable local ordinances relevant to biological resources are the Siskiyou County General Plan Conservation Element (Siskiyou County 1973) and Humboldt County General Plan (Humboldt County 2017b). The Siskiyou County General Plan Conservation Element includes recommendations to conserve fish and wildlife habitat and natural vegetation; however, it does not include specific policies that would be applicable to the project. The County has not adopted or implemented a tree preservation or mitigation ordinance. Thus, implementation of treatment activities would not conflict with local ordinances. The Humboldt County General Plan (Humboldt County 2017b) includes policies designed to protect rare, threatened, and endangered species; sensitive habitats (including sensitive fish and wildlife habitat); federally designated critical habitat; stream channels; wetlands; oak woodlands; Roosevelt elk habitat; migratory deer habitat; avian rookeries; and special-status plants; and to manage and control invasive plant species. CalVTP SPRs and mitigation measures would be consistent with most of these general plan policies. Humboldt County Code includes an ordinance regarding major vegetation removal (Section 313-64). Pursuant to this ordinance, the project proponent would obtain a Special Permit prior to conducting major vegetation removal as defined in the ordinance (i.e., removal of trees within a total aggregate contiguous or non-contiguous area or areas exceeding 6,000 square feet).

The potential for treatment activities to conflict with local policies or ordinances was examined in the Program EIR. The potential for the treatment project to conflict is within the scope of the Program EIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact BIO-8**: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan | Impact BIO-8, 3.6 | No Impact | SPR AD-1 | Yes | No Impact | ☒ |

Implementation of initial and maintenance treatments (i.e., prescribed burning, mechanical treatments, manual treatments) would not result in a conflict with adopted habitat conservation plans (HCP) or natural community conservation plans (NCCP), because the project area is not within the plan area of any adopted HCP or NCCP. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Biological Resources**: Would the project result in other impacts on biological resources that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR and revisions to SPRs constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological 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 proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revisions to SPRs and mitigation measures would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR BIO-1: Review and Survey Project-Specific Biological Resources.** | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |
| 1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.** | Yes | | |
| 2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. This SPR applies to all treatment activities and treatment types. | Yes | | |

A list of special-status plant and wildlife species with potential to occur in the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the US Geological Survey (USGS) quadrangles containing and surrounding the project area (72 quadrangles total; CNDDB 2022; CNPS 2022); the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2022b); *Siskiyou County General Plan Conservation Element* (Siskiyou County 1973); *Humboldt County General Plan* (Humboldt County 2017b); and Appendix BIO-3 (Table 5a, Table 5b, Table 10a, Table 10b, and Table 19) in the Program EIR (Volume II) for special-status plants and wildlife that could occur in the Klamath Mountains and Northern California Coast Range ecoregions. For special-status plants, Consortium of California of Herbaria (CCH2 2022), Jepson eFlora (Jepson Flora Project 2022), and Calflora (Calflora 2022) were also consulted. A list of sensitive natural communities with potential to occur in the project area was compiled by completing a CNDDB search of the 72 USGS quadrangles containing and surrounding the project area (CNDDB 2022) and reviewing Table 3.6-11 (pages 3.6-47 – 3.6-49) and Table 3.6-18 (pages 3.6-70 – 3.6-71) in the Program EIR (Volume II) for sensitive natural communities that could occur in the Klamath Mountains and Northern California Coast Range ecoregions in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys on February 24–25, 2023, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible, and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys, a list of all species with potential to occur in the vicinity of the proposed project was assembled (Attachment B; Table B-2). One hundred and three of the special-status plants and 30 of the special-status wildlife from the full list of species were determined to potentially occur in the project area and four special-status plants were determined to occur in the project area (Attachment B; Table B-2). Some portions of the project area are located adjacent to SR 96 and are characterized by developed or disturbed land cover types; commercial areas associated with communities; and rural residential areas with homes, other structures, and agricultural features. Much of the forest habitats within and directly adjacent to these areas has been thinned and does not exhibit undisturbed or late seral characteristics that are required by some of the special-status wildlife species with potential to occur in the project area. Generally, these areas are less likely to support the special-status species included in Attachment B than less developed portions of the project area.

Based on the results of the data review and reconnaissance-level survey, it was determined that habitat suitable for wetlands and some special-status wildlife is present but adverse effects can be clearly avoided (Attachment B). However, for special-status plants, sensitive natural communities, sensitive habitats, and other special-status wildlife species, habitat is present and adverse effects cannot be clearly avoided (Attachment B). For these biological resources, where habitat is present and adverse effects cannot be clearly avoided, further review and surveys will be conducted.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Biological resource training for workers will be conducted prior to and during implementation of treatments, as necessary.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Based on implementation of SPR BIO-1, it was determined that sensitive natural communities or other sensitive habitats may be present in the project area. While adverse effects on some of these resources would be avoided through project design or implementation of SPRs, adverse effects on all of these sensitive habitats cannot be avoided. A qualified RPF or botanist will conduct a survey following the CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* prior to the start of treatment activities (CDFW 2018). Sensitive natural communities and other sensitive habitats, including oak woodlands and riparian habitat, within the project area will be mapped by a qualified RPF or botanist during this survey.

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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Class I, II, and III watercourses occur throughout the project area. WLPZs and Equipment Limitation Zones (ELZs) will be established adjacent to all Class I, Class II, and Class II streams within the project area. Treatments in riparian habitats will retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and will largely be limited to removal of uncharacteristic

fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, prior to any treatments in riparian habitat, CDFW will be notified pursuant to California Fish and Game Code 1602, when required.

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| **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. These SPR requirements apply to all treatment activities and all treatment types.<br>Additional measures will be applied to ecological restoration treatment types | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

The project area contains mixed chaparral and montane chaparral habitats (see additional detail in Attachment B). Treatments implemented in chaparral habitats will be designed to avoid type conversion of chaparral habitats and to maintain the function of these habitats. This will include designing treatments based on current fire return interval departure and condition class of the chaparral vegetation onsite, maintaining a minimum percent cover of mature native shrubs, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Refer to the discussion of chaparral in Attachment B for details regarding treatment design parameters that would maintain chaparral habitat function in the project area. Treatments in all sensitive habitats in the project area will be designed to maintain the membership rules of the affected vegetation alliance, maintain ecological function, and improve wildfire resilience.

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| **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., Ione chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

Best management practices (BMPs) listed under SPR BIO-6 in Attachment A will be implemented, which includes cleaning and sanitizing vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site.

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| **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." This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

It has been determined that habitat potentially suitable for 106 special-status plant species is present in the project area. Of the 106 plants with potential to occur or known occurrences within the project area, there are 75 perennial species, 26 geophyte species, and five annual species (see Impact BIO-1). Protocol-level surveys for the special-status plant species identified in Attachment B will be conducted in suitable habitat areas prior to implementation of treatments. Seasonal avoidance measures can be implemented without conducting surveys when annual and geophytic species may be present (see Attachment B).

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| **SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs.** This SPR applies to all treatment activities and only the ecosystem restoration treatment type. | No | N/A | N/A |

The project area is outside of the Coastal Zone; therefore, this SPR does not apply.

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| **SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife.** This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

During reconnaissance surveys, invasive plant species such as Himalayan blackberry (*Rubus armeniacus*), scotch broom (*Cytisus scoparius*), French broom (*Genista monspessulana*) and numerous nonnative species were noted within the project area. The project proponent will implement the BMPs listed under SPR BIO-9 in Attachment A.

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| **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) 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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

If implementation of treatment activities outside of identified avoidance buffers or limited operating periods during sensitive seasons is determined to be infeasible, surveys will be required prior to implementation of treatment activities in habitat suitable for Cascades frog, foothill yellow-legged frog, Pacific tailed frog, Scott Bar salamander, Siskiyou Mountains salamander, southern long-toed salamander, southern torrent salamander, western pond turtle, American peregrine falcon, bald eagle, black swift, golden eagle, northern goshawk, northern spotted owl, Franklin's bumble bee, Suckley's cuckoo bumble bee, western bumble bee, American badger, fisher, Humboldt marten, pallid bat, Townsend's big-eared bat, and wildlife nursery sites. Surveys will be required for monarch and ringtail, unless these species are assumed to occur in the project area and feasible mitigation is implemented based on that assumption.

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| **SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory).** This SPR applies only to prescribed herbivory and all treatment types. | No | N/A | N/A |

The project does not include prescribed herbivory treatments; therefore, this SPR does not apply.

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| **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 Program EIR. The active nesting season or peak nesting season will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

For treatments implemented during the nesting bird season (February 1–August 31), a survey for common nesting birds will be conducted within the project area prior to treatment activities. If active nests of common birds or raptors are observed during focused surveys,

disturbance to the nests will be avoided by modifying treatments to avoid disturbance to the nests, deferring treatment until the nests are no longer active as determined by an RPF or qualified biologist, or establishing an appropriate buffer around the nests. Buffers will be established by a qualified biologist or RPF based on rationale such as species sensitivity, vegetative cover, nest height, and topography that will attenuate noise and visual disturbance. In addition, trees with raptor nests will be retained regardless of nest occupancy status.

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| **MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA**<br>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). | Yes | Mid Klamath Watershed Council<br>Prior-During | Mid Klamath Watershed Council |

The three species-status plants listed under ESA or CESA, McDonald's rockcress (*Arabis mcdonaldiana*), Yreka phlox (*Phlox hirsuta*), and whitebark pine (*Pinus albicaulis*), will be avoided and protected during treatment 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).

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| **MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA**<br>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 measures to avoid loss of individuals and maintain habitat function of occupied habitat. | Yes | Mid Klamath Watershed Council<br>Prior-During | Mid Klamath Watershed Council |

Measures will be implemented to avoid loss of individuals and maintain habitat function of occupied habitat for the 103 special-status plants not listed under ESA or CESA such that impacts would not be significant.

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| **MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants**<br>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. 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.<br>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above. | No | N/A | N/A |

This mitigation measure does not apply to the project. Mitigation Measures BIO-1a and BIO-1b will be implemented to avoid significant impacts on special-status plant species; therefore, no compensatory mitigation will be required.

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| **MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)** | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The measures listed in Attachment A will be implemented to avoid impacts on and maintain habitat function (e.g., suitable vegetative cover, nesting trees) for Cascades frog, Scott Bar salamander, Siskiyou Mountains salamander, American peregrine falcon, bald eagle, golden eagle, northern spotted owl, gray wolf, Humboldt marten, and ringtail. In addition, the project proponent will consult with CDFW and USFWS as appropriate in conformance with the requirements of MM BIO-2a.

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| **MM 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.<br><br>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the 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. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The measures listed in Attachment A will be implemented to avoid impacts on and maintain habitat function (e.g., suitable vegetative cover, nesting trees, host plants) for foothill yellow-legged frog, Pacific tailed frog, southern long-toed salamander, southern torrent salamander, western pond turtle, black swift, northern goshawk, olive-sided flycatcher, American badger, fisher, pallid bat, and Townsend's big-eared bat.

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| **MM 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 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.<br><br>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. | Yes | Mid Klamath Watershed Council During-Post | Mid Klamath Watershed Council |

If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA or ESA for state or federally listed wildlife species.

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| **MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)** | No | N/A | N/A |

This mitigation measure does not apply to the project because the project area is outside of the range of valley elderberry longhorn beetle.

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| **MM BIO-2e: Design Treatment to Retain Special-Status Butter=-0fly Host Plants (All Treatment Activities)** 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 would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required. | No | N/A | N/A |

This mitigation measure does not apply to the project because the project area is outside of the range of federally listed butterfly species. As described in Attachment B, impacts on monarch butterfly, a candidate for listing under ESA, would be less than significant and Mitigation Measure BIO-2e would not be required.

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| **MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)** | No | N/A | N/A |

This mitigation measure does not apply to the project because the project area is outside of the range of any special-status beetles, flies, grasshoppers, or snails.

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| **MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)** 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 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. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

Measures listed in Attachment A will be implemented to avoid or minimize impacts on and maintain habitat function (e.g., floral resources) for Franklin's bumble bee, Suckley's cuckoo bumble bee, and western bumble bee.

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| **MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)** | No | N/A | N/A |

The project does not include prescribed herbivory treatments; therefore, this mitigation measure does not apply.

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| **MM 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:<br>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. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

The project area potentially contains 41 sensitive natural communities as defined by CDFW and three oak woodland types (Oregon white oak woodland, coastal oak woodland, and blue oak woodland) (Attachment B). Under Mitigation Measure BIO-3a, a qualified RPF or biologist will determine the natural fire regime, condition class, and FRI for each sensitive natural community and oak woodland type. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands will be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function.

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| **MM 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 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. | Yes | Mid Klamath Watershed Council During-Post | Mid Klamath Watershed Council |

If habitat function of sensitive natural communities and oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, unavoidable losses of these resources will be compensated through restoration or preservation of these vegetation types within or outside of the project area.

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| **MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat**<br>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. | Yes | Mid Klamath Watershed Council During-Post | Mid Klamath Watershed Council |

WLPZs and ELZs will be established adjacent to all Class I, Class II, and Class III streams within the project area, and protections applied in all WLPZs and ELZs is anticipated to avoid the loss or degradation of riparian habitat functions. However, riparian habitat may be present beyond WLPZs and EEZs, which are primarily intended to protect water quality.

If, after implementation of SPR BIO-4, impacts on riparian habitat remain significant under CEQA, unavoidable losses of these resources will be compensated through restoration or preservation of these vegetation types within or outside of the project area.

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| **MM BIO-4: Avoid State and Federally Protected Wetlands** | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

There are several types of wetlands mapped in the project area including wet meadows, seasonal freshwater emergent wetlands, and seasonal freshwater wetlands forested/shrub (USFWS 2022a). Because WLPZs established would not apply to seasonal wetland habitat, a qualified RPF or biologist will delineate the boundaries of these seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance will be prohibited within this buffer.

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| **MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites** | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

If wildlife nursery habitat is identified during SPR BIO-10 surveys, treatment activities could result in disturbance of nursery behavior causing loss of young or result in direct removal of nursery habitat and this mitigation measure will apply. A qualified RPF or biologist will establish buffers around active deer or Roosevelt elk fawning sites, heron or egret rookeries, or significant common bat roosts of the appropriate size prior to implementation of treatment activities. The appropriate size and shape of the buffer will be based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors.

Refer to Attachment A for guidance on the project-specific review and survey procedures for biological resources.

# EC-6: GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

| | Program EIR specific | | | Project specific | | |
|---|---|---|---|---|---|---|
| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact GEO-1:** Result in Substantial Erosion or Loss of Topsoil | Impact Geo-1, 3.7 | LTS | SPR GEO-1, 2, 3, 4, 5, 6, 7, 8, SPR HYD-3 SPR AQ-3, 4 SPR HYD-4 SPR AD-3 | Yes | LTS | ☒ |

The table below includes a summary of the six dominant soil types that may be present in the project area. Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity. K values range from 0.02 to 0.69. Other factors being equal, the greater the value, the more susceptible the soil is to sheet and rill erosion by water (NRCS 2022). The soil types in the table represent the range of erosion factor ratings within the project area.

| Soil Type | Erosion Factor K | Erosion Potential |
|---|---|---|
| Holland-Skalan families association, 15 to 30 percent slope. | 0.17 | Low |
| Clallam family, very deep-Riverwash association, 0 to 15 percent slope. | NA | NA |
| Clallam, deep-Holland families association, 30 to 70 percent slope. | 0.10 | Low |
| Riverwash | NA | NA |
| Clallam, deep-Goldridge, gravelly families association, 30 to 90 percent slopes. | 0.10 | Low |
| Holland-Aiken families association, 2 to 15 percent slopes. | 0.17 | Low |
| Skalan-Clallum, deep-Decry families association, 15 to 70 percent slopes. | 0.10 | Low |

Vegetation treatments would include ecological restoration and WUI fuel reduction through use of prescribed burning, mechanical treatments, and manual treatments. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the Program EIR use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 related to soil erosion is also the same, as described above. In addition, Mid Klamath Watershed Council 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. Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize negative impacts in WLPZs. For these reasons, proposed revisions to SPR GEO-1, AQ-3, and HYD-4 would not result in a substantially more severe significant effect related to

erosion or loss of topsoil than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact GEO-2**: Increase Risk of Landslide | Impact Geo-2, 3.7 | LTS | SPR GEO-3, 4, 7, 8, SPR AQ- 3 SPR AD-3 | Yes | LTS | ☒ |

Treatment activities would include prescribed burning, mechanical treatments, and manual treatments. No quaternary faults are identified in the project area however, landslide activity has been identified within the project area (USGS 2022a; USGS 2022b). In addition, given the variable topography in some of the treatment areas, the remoteness of the area, steep terrain, and wet winter conditions, there is the potential for additional landslides that are not mapped to occur within the project area. Soil stabilization, erosion monitoring, and slope restrictions for heavy machinery will be implemented in the fuel treatment activities to minimize landslide potential. The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is also the same, as described above. In addition, Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. For this reason, proposed revisions to SPR AQ-3 would not result in a substantially more severe significant effect related to landslide risk than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Geology, Soils, Paleontology, and Mineral Resources**: Would the project result in other impacts on geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.7.1, “Environmental Setting,” and Section 3.7.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the

boundary of the project area, the existing environmental and regulatory conditions pertinent to geology and soils 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 treatment project are also consistent with those covered in the Program EIR. 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 geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR GEO-1 Suspend Disturbance during Heavy Precipitation:** The project proponent will 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. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Mechanical treatment activities will be suspended during heavy precipitation events to minimize the risk of soil compaction and disturbance. The project does not propose prescribed herbivory or herbicide treatment activities.

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| **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. This SPR applies only to mechanical treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Operators will avoid driving heavy equipment and other high ground pressure vehicles on saturated soils to minimize the risk of soil compaction and disturbance.

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| **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. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During-Post | Mid Klamath Watershed Council |

Mid Klamath Watershed Council will stabilize soils following proposed prescribed burns and mechanical treatments that result in exposure of bare soil over 50 percent or more of the project area. This project includes chipping materials and scattering the chips within the treated areas, which will reduce the amount of exposed bare soil following treatments.

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| **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. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

After the first storm event where 1.5 inches of rain or more falls within a 24-hour period, the project area will be inspected to determine if erosion control measures functioned properly. If any area is identified where erosion could result in substantial discharge, the area will be stabilized within 48 hours of the rainfall event.

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| **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 (CalEPA 2020). This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Stormwater runoff will be drained via water breaks to minimize the risk of erosion occurring within the project area or on road infrastructure following mechanical and manual treatments that may compact or disturb soils.

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| **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. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Burn piles will not exceed 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the Program EIR as presented in Attachment A.

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| **SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads.** This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

The use of heavy equipment (i.e., bulldozers, masticators, chippers) will not occur on slopes over 65 percent or slopes steeper than 50 percent where the erosion hazard rating is high or extreme.

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| **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). This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The use of heavy equipment (i.e., bulldozers, masticators, chippers) for mechanical treatment activities will not occur on slopes over 65 percent or slopes steeper than 50 percent where the erosion hazard rating is high or extreme. For other treatment activities, an RPF or licensed geologist will evaluate treatment areas with slopes greater than 50 percent for any unstable areas and unstable soils. If these areas are unavoidable, additional measures would be implemented to ensure that substantial erosion or loss of topsoil would not occur.

# EC-7: GREENHOUSE GAS EMISSIONS

| | Program EIR specific | | | Project specific | | |
|---|---|---|---|---|---|---|
| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact GHG-1**: Conflict with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs | Impact GHG-1, 3.8 | LTS | SPR GHG-1<br>SPR AD-3 | Yes | LTS | ☒ |

The use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term by avoiding wildfire. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact GHG-2**: Generate Greenhouse Gas Emissions through Treatment Activities | Impact GHG-2, 3.8 | PSU | SPR AQ-3<br>SPR AD-3<br>MM GHG-2 | Yes | SU | ☒ |

The use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. This impact would be significant and is within the scope of the Program EIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the Program EIR.

Estimated amounts of carbon dioxide equivalent ($MTCO_2e$)/ acre produced by mechanical, manual, and prescribed burn treatments in each fuel type present in the project area are presented in the CalVTP Program EIR Table 3.8-3. The GHG emissions produced from this treatment project are within the scope of the impacts evaluated in the Program EIR because the proposed activities, equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions associated with wildfire are consistent with those analyzed in the Program EIR. Therefore, the potential for the project treatment activities to result in GHG emissions is considered significant and unavoidable, consistent with the Program EIR.

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 Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. In addition, Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. For this reason, proposed revisions to SPR AQ-3 would not result in a substantially more severe significant effect related to GHG emissions than what was covered in the Program EIR. This impact would remain significant and unavoidable as explained in the Program EIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

| | | | | | | |
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| **Other Impacts related to Greenhouse Gases**: Would the project result in other impacts related to greenhouse gases that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 Program EIR (refer to Section 3.8.1, “Regulatory Setting,” and Section 3.8.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the proposed treatments and inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **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 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. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process.

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| **MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns.** 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. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

A Burn Plan pursuant to SPR AQ-3 will be prepared prior to pile and broadcast burn treatments, as required.

# EC-8: ENERGY

| | Program EIR specific | | | Project specific | | |
|---|---|---|---|---|---|---|
| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact ENG-1**: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy | Impact ENG-1, 3.9 | LTS | N/A | Yes | LTS | ☒ |

The use of vehicles and mechanical equipment during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. 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 Program EIR. However, existing energy consumption is essentially the same within and outside the treatable landscape; thus, the increase in the use of vehicles and mechanical equipment, and related energy use, would not be substantially greater than that analyzed in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

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| **Other Impacts on Energy Resources**: Would the project result in other impacts on energy resources that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. 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 proposed treatment project are also consistent with those considered in the Program EIR. 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 energy resources would occur.

# EC-9: HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

| | Program EIR specific | | | Project specific | | |
|---|---|---|---|---|---|---|
| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact HAZ-1**: Create a Significant Health Hazard from the Use of Hazardous Materials | Impact HAZ-1, 3.10 | LTS | SPR HAZ-1, 2, 3, 4<br>SPR HYD-4<br>SPR AD-3 | Yes | LTS | ☒ |

Treatment activities would include prescribed burning, mechanical treatments, and manual treatments. These treatment activities would require the transportation, use, and storage of hazardous materials, including fuels, oils, and lubricants, as well as accelerants for prescribed burns. Potential impacts related to use of such materials during treatment activities are within the scope of activities and impacts addressed in the Program EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. The project proponent would ensure that the transport and use of hazardous materials would be conducted in compliance with existing federal, state, and local regulations governing hazardous material use, storage, disposal, and transport to prevent project-related risks to public health and safety. 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 Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. Therefore, the project would result in a less than significant impact related to the use of hazardous materials and the project would not result in impacts that would be more severe than those evaluated in the Program EIR.

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| **Impact HAZ-2:** Create a Significant Health Hazard from the Use of Herbicides | Impact HAZ-2, 3.10 | LTS | SPR HAZ-5, 6, 7, 8, 9 SPR AD-3 | No | N/A | ☒ |

This impact does not apply to the proposed project because the use of herbicides is not proposed.

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| **Impact HAZ-3**: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites | Impact HAZ-3, 3.10 | LTSM | SPR AD-3 MM HAZ-3 | Yes | LTSM | ☒ |

The proposed project would include prescribed burning, mechanical treatments, and manual treatments, which would result in soil disturbance and could expose workers or the environment to hazards from hazardous materials site, if present within the project area. The potential for the proposed treatment activities to encounter contamination that could expose workers or the environment to hazardous materials was examined in the Program EIR. This impact was identified as potentially significant in the Program EIR 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. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within in the project area have been conducted. Five cleanup program sites (Nevada King Company [T0609393119], USDA Buzzard Hill Mine [T0609393428], USFS Sawyers Bar [T10000017252], CDOT Orleans Maintenance Station [SL0602310179], and Brown, Albert [T10000003042]) were located within the Happy Camp, Somes Bar, and Orleans areas within the project area; however, all sites have been inactive, closed, or are being remediated (DTSC 2022; CalEPA 2016; SWRCB 2022) (Attachment C). Therefore, it was determined that no hazardous materials sites would be disturbed by treatments and this impact 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 Program EIR. 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 is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Hazardous Materials, Public Health and Safety**: Would the project result in other impacts on hazardous materials, public health and safety that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 Program EIR (refer to Section 3.10.1, “Environmental Setting,” and Section 3.10.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. 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 hazardous materials, public health, or safety would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Crews conducting prescribed burning, mechanical treatments, and manual treatments will maintain all equipment to minimize the risk of impacts resulting from leaks.

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| **SPR HAZ-2 Require Spark Arrestors**: This SPR applies only to manual treatment activities and all treatment types | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

All mechanized hand tools will have federal- or state-approved spark arrestors.

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| **SPR HAZ-3 Require Fire Extinguishers:** The project proponent will require tree cutting crews to be equipped with the required hand tools for firefighting consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Manual treatment crews will carry one fire extinguisher per chainsaw and vehicles will be equipped with the required hand tools for firefighting consistent with PRC Section 4428.

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| **SPR HAZ-4 Prohibit Smoking in Vegetated Areas.** This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Crews will not be permitted to smoke in vegetated areas prior to or during treatment activities.

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| **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, adjuvants, or other potential contaminants. This SPR applies only to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HAZ-5 does not apply to the proposed project because herbicides would not be used within the project area.

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| **SPR HAZ-6 Comply with Herbicide Application Regulations.** This SPR applies only to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HAZ-6 does not apply to the proposed project because herbicides would not be used within the project area.

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| **SPR HAZ-7 Triple Rinse Herbicide Containers.** This SPR applies only to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HAZ-7 does not apply to the proposed project because herbicides would not be used within the project area.

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| **SPR HAZ-8 Minimize Herbicide Drift to Public Areas.** This SPR applies only to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HAZ-8 does not apply to the proposed project because herbicides would not be used within the project area.

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| **SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas.** This SPR applies only to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HAZ-9 does not apply to the proposed project because herbicides would not be used within the project area.

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| **MM 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. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

As discussed above, database searches for hazardous materials sites have been conducted, and five hazardous materials sites were identified within the project area. All sites have been inactive, closed, or are being remediated (DTSC 2022; CalEPA 2016; SWRCB 2022) (Attachment C).

# EC-10: HYDROLOGY AND WATER QUALITY

| | Program EIR specific | | | Project specific | | |
|---|---|---|---|---|---|---|
| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **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 | Impact HYD-1, 3.11 | LTS | SPR AD-3 SPR HYD-2, 4 SPR AQ-3 SPR BIO-4, 5 SPR GEO-4, 6 MM BIO-3b | Yes | LTS | ☒ |

The project area is in the North Coast hydrologic region and is under the jurisdiction of the North Coast Regional Water Quality Control Board (Region 1). Treatment areas are located in west Siskiyou County and northeast Humboldt County. The primary hydrologic features in

the project vicinity are the Klamath River and Salmon River. The main drainages in the project area that flow into those rivers are Indian Creek, Seiad Creek, Buckhorn Creek, Camp Creek, and Horse Creek. There are over 40 named creeks in the project area and numerous other unnamed perennial and seasonal tributaries that flow into the rivers and creeks in the project vicinity. Hydrological features in the project area range from Class I to Class III. There are also many small lakes within the project area. Slopes within the project area drain into the Klamath and Salmon rivers and their upstream tributaries identified above.

Initial and maintenance treatments would include prescribed burning. Ash and debris from the project area could be washed by runoff into adjacent drainages and streams. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for Class I and Class II streams that are within treatment areas and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III streams within treatment areas. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low-intensity prescribed burns and associated impacts on water quality are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impacts from prescribed burning are also the same, as described above. In addition, Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize negative impacts in WLPZs. For these reasons, proposed revisions to SPR AQ-3 and HYD-4 would not result in a substantially more severe significant effect related to water quality than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **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 | Impact HYD-2, 3.11 | LTS | SPR AD-3<br>SPR HYD-1, 4, 5<br>SPR BIO-1<br>SPR GEO-1, 2, 3, 4, 5, 7, 8<br>SPR HAZ-1, 5 | Yes | LTS | ☒ |

Initial treatments would include mechanical treatments and manual treatments. Although treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for any Class I or Class II watercourses and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III streams within treatment areas. The potential for mechanical treatments and manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use and type of equipment used during manual and mechanical treatments (e.g., tractors/skidders, masticators, chainsaws, hand saws, brush cutters), extent of vegetation removal, and intensity of proposed mechanical treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. In addition, Mid Klamath Watershed Council 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. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize negative impacts in WLPZs. For these reasons, proposed revisions to SPR GEO-1 and HYD-4 would not result in a substantially more severe significant effect related to water quality than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **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 | Impact HYD-3, 3.11 | LTS | SPR AD-3<br>SPR HYD-3 | No | N/A | ☒ |

This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

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| **Impact HYD-4**: 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 Ground Application of Herbicides | Impact HYD-4, 3.11 | LTS | SPR AD-3<br>SPR HYD-5<br>SPR BIO-4<br>SPR HAZ-5, 7 | No | N/A | ☒ |

This impact does not apply to the proposed project because herbicide application is not a proposed treatment activity.

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| **Impact HYD-5**: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area | Impact HYD-5, 3.11 | LTS | SPR AD-3<br>SPR HYD-2, 4, 6<br>SPR GEO-5 | Yes | LTS | ☒ |

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project area was examined in the

Program EIR. This impact on drainage in the project area is within the scope of the Program EIR because the use and type of equipment, extent of vegetation removal, use of manual treatments, and intensity of proposed mechanical treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. In addition, Mid Klamath Watershed Council proposes to revise SPR HYD-4 to allow fire ignition within WLPZs only by propane torches or traditional methods (e.g., pitch sticks or grass bundles) in meadows. All other elements of SPR HYD-4 would remain the same as presented in the Program EIR. Although fire ignition could occur in WLPZs, because it would only be allowed in meadows using propane torches or traditional methods, potentially harmful accelerants would not be used or enter WLPZs as a result. This revision is consistent with the overall purpose of SPR HYD-4 to avoid and minimize negative impacts in WLPZs. For these reasons, proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect to drainage than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Hydrology and Water Quality**: Would the project result in other impacts on hydrology and water quality that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.11.1, “Environmental Setting,” and Section 3.11.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality 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 treatment project are also consistent with those covered in the Program EIR. 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 hydrology and water quality would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

Initial and maintenance treatments will be implemented in conformance with applicable regulatory requirements of the Waste Discharge Requirements and/or related Waivers and the water quality control plan for the North Coast hydrologic region, pursuant to the standards

adopted by the North Coast Regional Water Quality Control Board. This project is automatically enrolled in the Vegetation Treatment General Order (ORDER WQ 2021-0026-DWQ).

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| **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. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

No new roads will be constructed under the proposed project.

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| **SPR HYD-3 Water Quality Protections for Prescribed Herbivory:** This SPR applies to prescribed herbivory treatment activities and all treatment types. | No | N/A | N/A |

SPR HYD-3 does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

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| **SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones:** The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916.5 of the California Forest Practice Rules on either side of watercourses (CalEPA 2020). This SPR applies to all treatment activities and treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

WLPZs will be established for watercourses within the project area based on the widths and protective measures established for each water and slope class defined in Table I of 14 California Code of Regulations Section 916.5. Class I – Class III water courses exist in the project area. WLPZs ranging from 50 to 150 feet adjacent to all Class I and Class II streams and lakes (defined under Forest Practice Rules as a permanent natural body of water of any size, or an artificially impounded body of water having a surface area of at least one acre; CAL FIRE 2020) within the project area would be implemented and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) streams for all treatment types.

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| **SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides:** This SPR applies to herbicide treatment activities and all treatment types. | No | N/A | N/A |

SPR HYD-5 does not apply to the proposed project because herbicide application is not a proposed treatment activity.

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| **SPR HYD-6 Protect Existing Drainage Systems:** This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

All stormwater drainage infrastructure will be flagged prior to treatment activities to prevent disturbance or modification. If stormwater drainage infrastructure is inadvertently disturbed or modified, the project proponent will repair any damage and restore pre-project drainage conditions.

# EC-11: LAND USE AND PLANNING, POPULATION AND HOUSING

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact LU-1**: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation | Impact LU-1, 3.12 | LTS | SPR AD-3, 9 | Yes | LTS | ☒ |

Treatments would occur within western Siskiyou and eastern Humboldt counties on private SRA lands. As discussed in Sections EC-5, "Biological Resources," and EC-12, "Noise," the proposed treatments would not conflict with local land use plans, policies, or regulations. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment locations, types, and activities associated with the project are consistent with those analyzed in the Program EIR. 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 Program EIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

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| **Impact LU-2**: Induce Substantial Unplanned Population Growth | Impact LU-2, 3.12 | LTS | N/A | Yes | LTS | ☒ |

The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the Program EIR. Prescribed burning treatment activities would require between 10 and 60 crew members, depending on size of the burn unit. Mechanical and manual treatment activities may require between 1 and 50 crew members, up to four crews. Crew sizes would be consistent with those analyzed in the Program EIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR because the number of workers required for implementation of the treatments is consistent with the crew sizes analyzed in the Program EIR for the types of treatments proposed. In addition, the proposed project would not require the hiring of new employees. 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 Program EIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

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| **Other Impacts related to Land Use and Planning, Population and Housing:** Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. 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 proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to land use and planning would occur that is not covered in the Program EIR.

# EC-12: NOISE

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact NOI-1:** Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation | Impact NOI-1, 3.13 | LTS | SPR NOI-1, 2, 3, 4, 5, 6 SPR AD-3 | Yes | LTS | ☒ |

The initial and maintenance treatments would include the use of mechanical treatments that require heavy noise-generating equipment. The potential for a substantial short-term increase in ambient noise levels was analyzed in the Program EIR. Short-term increases in noise from the use of heavy equipment is within the scope of the activities and impacts addressed in the Program EIR because the types and number of equipment proposed, the duration of use of the equipment, and equipment use being temporary and sporadic, are consistent with those analyzed in the Program EIR. There are a few rural residences near the project area and WUI fuel reduction treatment would occur near the following unincorporated communities: Cecilville, Sawyers Bar, Forks of Salmon, Orleans, Somes Bar, Happy Camp, Seiad Valley, Hamburg, and Horse Creek. Therefore, treatments may be located near residences. Although there are no adopted noise ordinances for either Humboldt County or Siskiyou County, treatment activities would occur during daytime hours, typically between 7:00 a.m. and 6:00 p.m. This would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. In the absence of standards for construction noise, for treatments occurring within Siskiyou County, Siskiyou County's land use/noise compatibility interior standards would be applied, which limit interior noise to 45 decibels (dB) $L_{dn}$ for noise sensitive receptors. $L_{dn}$ is the day-night average sound level and is used to describe the cumulative noise exposure during an average annual day. For treatments occurring within Humboldt County, the Humboldt County land use/noise compatibility interior standards would be applied, which also limit interior noise to 45 decibels (dB) $L_{dn}$ for noise sensitive receptors. As discussed in the Program EIR, noise levels generated by individual equipment range from 77 to 87.9 dB at 50 feet from the noise source, with the loudest type of equipment being a chainsaw. Though multiple pieces of equipment would be operated simultaneously to implement a treatment, they would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment such as masticators,

chippers, bulldozers, skid steers, and excavators. In addition, treatments would be dispersed throughout the project area so noise increases at any one sensitive receptor would be limited. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact NOI-2**: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities | Impact NOI-2, 3.13 | LTS | SPR NOI-1 | Yes | LTS | ☒ |

The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the project area. These work trucks would pass near residential receptors, which could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was evaluated in the Program EIR. Short-term increases in noise from the use of heavy equipment during project implementation is within the scope of the treatment activities and impacts addressed in the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. All truck trips and use of heavy equipment would be limited to daytime hours to avoid sleep disturbance of nearby residents. 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 Program EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts Related to Noise**: Would the project result in other impacts related to noise that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatment is consistent with the treatment types and activities discussed in the Program EIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, 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; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances would lead to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to noise would occur that is not analyzed in the Program EIR.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours:** If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions in SPR NOI-1 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. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Per SPR NOI-1 noise-generating vegetation treatment activities will be limited to 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.

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| **SPR NOI-2 Equipment Maintenance:** 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. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

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.

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| **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. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Pursuant to SPR NOI-3, the project proponent will ensure that engine shrouds are closed during equipment operation.

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| **SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses.** This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

Equipment will be staged within the property boundaries and not immediately adjacent to any sensitive receptors.

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| **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 trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council During | Mid Klamath Watershed Council |

The project proponent will ensure that equipment will be shut down when not in use and idling of equipment and haul trucks will be limited to 5 minutes.

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| **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. This SPR applies only to mechanical treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

All noise-sensitive receptors within 1,500 feet will be notified prior to treatments.

# EC-13: RECREATION

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact REC-1**: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas | Impact REC-1, 3.14 | LTS | SPR REC-1 | Yes | LTS | ☒ |

Recreational areas in the vicinity of and serving the project area include Klamath National Forest, Six Rivers National Forest, and Marble Mountain Wilderness Area. The project area is surrounded almost entirely by US Forest Service land (Klamath National Forest and Six Rivers National Forest), which provides many recreational activities, including hiking, campgrounds, dispersed camping, and off-highway vehicle touring. The campgrounds nearest to the treatment areas include Fish Lake Campground, Red Bank Campground, Oak Bottom Campground, Dillon Creek Campground, Grinder Creek Campground, and Fort Goff Campground. The trailheads nearest to the treatment areas include Taylor Lake Trailhead, Music Creek Trailhead, and Wooley Creek Trailhead. The Pacific Crest Trail also intersects a portion of the project area. Other recreational areas within the project area include the Pacific Coast Ranges, which are located approximately 5 miles north of Happy Camp. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. The potential for the proposed treatment project to impact recreation is within the scope of the Program EIR because the treatment activities and intensity are consistent with those analyzed in the Program EIR. 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 Program EIR. However, the availability of recreation resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact on recreation is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

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| **Other Impacts on Recreation**: Would the project result in other impacts on recreation that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.14.1, “Environmental Setting,” and Section 3.14.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land in the project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to recreation 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 treatment project are also consistent with those covered in the Program EIR. 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 recreation would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR REC-1 Notify Recreational Users of Temporary Closures.** 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 approximately 2 weeks prior to the commencement of the treatment activities. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

The project proponent will work with the owner/manager to notify the recreational users of temporary closures 2 weeks prior to the commencement of the treatment activities if temporary closures of a recreation area or facility are required.

# EC-14: TRANSPORTATION

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **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 | Impact TRAN-1, 3.15 | LTS | SPR TRAN-1 SPR AD-3 SPR HYD-2 | Yes | LTS | ☒ |

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project vicinity, including SR 96, and various public and private roadways (e.g., Sawyers Bar Road, Grayback Road). The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR

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| **Impact TRAN-2:** Substantially increase hazards due to a design feature or incompatible uses | Impact TRAN-2, 3.15 | LTS | SPR TRAN- 1 SPR AD-3 | Yes | LTS | ☒ |

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact TRAN-3**: Result in a net increase in VMT for the proposed CalVTP | Impact TRAN-3, 3.15 | PSU | MM AQ- 1 | Yes | SU | ☒ |

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT. Manual and mechanical treatments and prescribed burning under the proposed project would typically require between 1 and 60 crew members with up to four crews for each treatment type. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips would be temporary and dispersed over multiple roadways. A temporary increase in VMT is within the scope of the activities and impacts addressed in the Program EIR because the number and duration of increased vehicle trips are consistent with that analyzed in the Program EIR. While carpooling would be encouraged under Mitigation Measure AQ-1, crews may not all be employed with the same company. Therefore, carpooling may not be feasible to implement for some of the workers. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. For these reasons, and as explained in the Program EIR, this impact would remain significant and unavoidable. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the transportation-related conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Transportation**: Would the project result in other impacts on transportation that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. 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 transportation would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **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. This SPR applies to all treatment activities and treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

The proposed project would not result in a permanent increase in traffic. During treatment activities, vehicles would access the project area from SR 96, SR 3 and various local roadways and private roadways in the project area (e.g., Sawyers Bar Road, Grayback Road). The project proponent will coordinate with the California Department of Transportation, Siskiyou County, and other applicable agencies with jurisdiction to determine if traffic control is needed at any affected roadway segment within or surrounding the project area. At a minimum, signs will be placed along all affected roadways to advise motorists of slow vehicles entering and exiting these roadways. Additionally, signs will be placed along affected roadways to advise of smoke conditions during prescribed burning operations.

# EC-15: PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact UTIL-1**: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs | Impact UTL-1, 3.16 | LTS | SPR AD-3 | Yes | LTS | ☒ |

Treatment activities would involve prescribed burning, mechanical treatments, manual treatments. Treatment activities would require an on-site water supply for fire suppression in the event a burn goes out of prescription. If needed, water would be supplied from water trucks. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the water supplies present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact UTIL-2**: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity | Impact UTL-2, 3.16 | PSU | SPR AD-3 SPR UTIL-1 | Yes | SU | ☒ |

The initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical treatments and manual treatments would be disposed of with mastication, chipping, piling and burning, or lopping scattering biomass in areas where material cannot safely be broadcast burned. Invasive plant and noxious weed biomass would also be treated onsite or disposed of offsite at an appropriate waste collection facility to eliminate seed and propagules; however, invasive plants and noxious weeds will not be chipped and spread, scattered, or mulched onsite. The potential for biomass to exceed the capacity of existing infrastructure was examined in the Program EIR. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, it is anticipated that no more than 10 percent of the biomass would be hauled off-site. While the amount of biomass generated is not expected to exceed the capacity of existing local infrastructure in Siskiyou or Humboldt counties because the project would generate biomass needing offsite disposal, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as 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 Program EIR. However, within the boundary of the project area, conditions related to biomass in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above.

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| **Impact UTIL-3**: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste | Impact UTL-3, 3.16 | LTS | SPR AD-3 SPR UTIL- 1 | Yes | LTS | ☒ |

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of with mastication, chipping, piling and burning, or lopping scattering biomass in areas where material cannot safely be broadcast burned. Invasive plant and noxious weed biomass would also be treated onsite, when possible. If invasive plant biomass cannot be treated onsite, there is the potential for a small amount to be disposed of offsite at an appropriate waste collection facility. If offsite disposal is required, the project proponent would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Other Impacts on Public Services, Utilities, and Service Systems**: Would the project result in other impacts on public services, utilities, and service systems that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 Program EIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to public services and utilities that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. 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 public services, utilities, or service systems would occur.

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **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. This SPR applies only to mechanical and manual treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

The project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities if the project requires disposal of material outside of the treatment area.

# EC-16: WILDFIRE

| | Program EIR specific | | | Project specific | | |
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| | Identify location of impact Analysis in the Program EIR | Identify impact Significance in the Program EIR | SPRs & MMs applicable to the impact analysis in Program EIR | Does the Impact Apply to the project Treatments proposed | Identify Impact Significance for the Treatment Project | No New Impact |
| **Impact WIL-1**: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire | Impact WIL-1, 3.17 | LTS | SPR AD-3 SPR HAZ-2, 3, 4 | Yes | LTS | ☒ |

Proposed vegetation treatment activities are prescribed burning, mechanical treatments, and manual treatments. Vegetation treatment involving mechanical equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final Program EIR, under

"Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, potentially including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a broadcast burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area and digging handlines to mineral soil (except in sensitive grassland or meadow habitats and where cultural or ceremonial prohibitions exist) to help prevent the accidental escape of fire as would be outlined per the approved burn plan. Water containers and safety equipment would be staged on site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is within the scope of the Program EIR because the types of equipment and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. In addition, Mid Klamath Watershed Council proposes to revise SPR HAZ-3 to require tree cutting crews to carry one backpack pump-type fire extinguisher filled with water and each vehicle to carry the required hand tools for firefighting, consistent with PRC Section 4428. This revision 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. For this reason, proposed revisions to SPR HAZ-3 would not result in a substantially more severe significant effect related to exacerbating fire risk than what was covered in the Program EIR.

This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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| **Impact WIL-2**: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides | Impact WIL-2, 3.17 | LTS | SPR AD-3 SPR AQ- 3 SPR GEO-3, 4, 5, 8 | Yes | LTS | ☒ |

Vegetation treatment types would include prescribed burning, mechanical treatments, and manual treatments, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration of treatments, and methods of prescribed burn implementation are consistent with those analyzed in the Program EIR. Impact GEO-2 discusses landslide risk present in the area. 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 Program EIR. 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 treatable landscape; therefore, the wildfire impact is also the same, as described above. In addition, Mid Klamath Watershed Council 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 (California PBA 2022). 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 proposed to be used by Mid Klamath Watershed Council contain all of these elements. In addition to these elements, Mid Klamath Watershed Council 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. For this reason, proposed revisions to SPR AQ-3 would not result in a substantially more severe significant effect related to exposing people to post-fire flooding or landslides than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

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| **Other Impacts related to Wildfire**: Would the project result in other impacts related to wildfire that are not evaluated in the CalVTP Program EIR? | | | | No | N/A | ☒ |

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 CalVTP Program EIR (refer to Section 3.17.1, “Environmental Setting,” and Section 3.17.2, “Regulatory Setting,” in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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 treatment project are also consistent with those covered in the Program EIR. No changed circumstances would give rise to new significant impacts not addressed in the Program EIR. Therefore, no other impact related to wildfire would occur that is not covered in the Program EIR.

# EC-17: ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

| | Applicable | Implementing Entity & Timing Relative to Implementation | Verifying/ Monitoring Entity |
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| **SPR AD-1 Project Proponent Coordination:** For treatments coordinated with CAL FIRE, CAL FIRE would meet with the Mid Klamath Watershed Council 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 would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types. | Yes | CAL FIRE Prior-During | Mid Klamath Watershed Council |

Coordination will be conducted by CAL FIRE as needed.

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| **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. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

Prior to beginning any treatment activities, Mid Klamath Watershed Council will clearly define the boundaries of the treatment area and protected resources on maps for the project area and with highly-visible flagging or clear, existing landscape demarcations.

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| **SPR AD-3 Consistency with Local Plans, Policies, and Ordinances:** The project proponent would 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. | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

As noted in EC-5, "Biological Resources," treatment activities would be consistent with the Siskiyou County General Plan, Humboldt County General Plan, and Humboldt County Code, which contain policies and ordinance pertaining to biological resources (Siskiyou County 1973; Humboldt County 2017b). As noted in Section EC-12, "Noise," treatment activities would take place during daytime hours consistent with Siskiyou County and Humboldt County land use/noise compatibility interior standards. Treatment activities will also be directly implementing priority treatments identified in local and County Community Wildfire Protection Plans and CAL FIRE Unit Fire Plans.

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| **SPR AD-4 Public Notifications for Prescribed Burning:** The project proponent will notify the public prior to prescribed burning. This SPR applies only to prescribed burn treatment activities and all treatment types. [Note: Revisions are proposed to this SPR; refer to Attachment A for the full text of the SPR.] | Yes | Mid Klamath Watershed Council Prior-During | Mid Klamath Watershed Council |

At least 1 day prior to the commencement of prescribed burning, the project proponent will post signs along SR 96 describing the activity and timing. 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 following: host public meetings; post notices on local, public bulletin boards; and contact project neighbors via telephone calls. During this outreach the project proponent will describe the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape.

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| **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. | Yes | Mid Klamath Watershed Council During-Post | Mid Klamath Watershed Council |

Trash receptacles will not be required on-site. All trash generated will be removed daily. Following completion of treatment activities, all flagging (except for flagging needed to protect sensitive resources for future treatments), trash, debris, and barriers will be removed from the project area.

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| **SPR AD-6 Public Notifications for Treatment Projects.** One to three days prior to the commencement of a treatment activity, the project proponent would 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 would 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. | Yes | Mid Klamath Watershed Council Prior | Mid Klamath Watershed Council |

One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the project area describing the activity and timing and requesting persons in the area to contact a designated representative.

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| **SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects**. For any vegetation treatment project using the CalVTP Program EIR 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. This SPR applies to all treatment activities and all treatment types. | Yes | Mid Klamath Watershed Council Prior-During-Post | Mid Klamath Watershed Council |

Information on the proposed treatment project was submitted to the Board on November 10, 2022. Once the project is approved and completed, respectively, updated information will be submitted to the Board for online posting on the CalVTP Project Viewer.

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| **SPR AD-8 Request Access for Post-Treatment Assessment.** For CAL FIRE projects, during contract development, CAL FIRE would include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types. | No | N/A | N/A |

This project would not be implemented by CAL FIRE; therefore, a contract is not necessary for implementation of treatments. This SPR does not apply to the project. However, as project proponent and implementing entity and as access is allowed, Mid Klamath Watershed Council will access areas post-treatment to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance.

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| **SPR AD-9. Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required**. When planning a treatment project within the Coastal Zone, the project proponent would contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. This SPR applies to all treatment activities and all treatment types. | No | N/A | N/A |

This project is outside of the coastal zone; this this SPR does not apply.

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# Attachment A

## Standard Project Requirements (SPR) & Mitigation Measures (MM)

# INTRODUCTION

Instructions for project-specific implementation of certain SPRs and mitigation measures have been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to SPRs and mitigation measures in the PEIR are shown in underline and strikethrough (e.g., herbicide application is not a proposed treatment under this PSA, so references to herbicide application in the SPRs and mitigation measures have been deleted in strikethrough). In all cases, the additional project-specific implementation instruction and clarifying edits to the SPRs and mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the PEIR.

# EC-1: 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.
- 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.
- 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.

# EC-2: AGRICULTURE AND FOREST RESOURCES

- NONE

# EC-3: 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.
- SPR AQ-2 Submit Smoke Management Plan: Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. When required by the air district, 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. 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 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 elements that are needed to ~~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.~~ 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. 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.
- 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 ARB, EPA, 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.
  - 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~~ any time it is visibly being tracked out onto public paved roadways, 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.
- 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).~~ 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 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.

- MM 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 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:

  - Diesel-powered off-road equipment used in construction will meet EPA'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.

# EC-4: ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES STANDARD PROJECT REQUIREMENTS

Cultural resource SPRs and mitigation measures require that qualified individuals implement components of the measures. The requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including supervised designees) as long as they are qualified.

**Qualified Archaeologist:** To be qualified, an archaeologist would hold a Prehistoric Archeology, Historic Archeology, Conservation, Cultural Anthropology, or Curation degree from an accredited university and meet the Secretary of

Interior's Qualifications Standards (36 CFR Part 61). The project proponent will review the resume and approve the qualifications of the archaeologists.

Archaeologically Trained Resource Professional: To be qualified, an archaeologically-trained resource professional would hold a valid Archaeological Training Certificate issued by CAL FIRE and the Board or equivalent state or local agency training or certification. Work performed by an archaeologically-trained resource professional must be reviewed and approved by a qualified archaeologist.

- 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.
- 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. 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. 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.
- 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.
- 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.
- 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.

- 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 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.
- 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.
- 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.
- MM 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 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.

# EC-5: BIOLOGICAL RESOURCES STANDARD PROJECT REQUIREMENTS

Biological resource SPRs and mitigation measures require that qualified individuals implement components of the measures. The requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including biologist, botanist, ecologist, Registered Professional Forester, biological technician, or supervised designees working at the direction of a qualified professional) as long as they are qualified for the task at hand.

Qualified Registered Professional Forester (RPF) or Biologist: To be qualified, an RPF or biologist would hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university and: 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting field surveys of relevant species or resources, 4) be knowledgeable about survey protocols, 5) be knowledgeable about state and federal laws regarding the protection of special-status species, and 6) have experience with CDFW's California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS). The project proponent will review the resume and approve the qualifications of RPFs or biologists. If species-specific protocol surveys are performed, surveys would be conducted by qualified RPFs or biologists with the minimum qualifications required by the appropriate protocols, including having CDFW or USFWS approval to conduct such surveys, if required by certain protocols.

Qualified RPF or Botanist: To be qualified, an RPF or botanist would 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal, state, and local statutes and regulations related to plants and plant collecting. The project proponent will review the resume and approve the qualifications of RPFs or botanists.

Qualified RPF or Biological Technician: To be qualified, an RPF or biological technician would 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting biological monitoring of relevant species or resources, and 4) be knowledgeable about state and federal laws regarding the protection of special-status species. The project proponent will review the resume and approve the qualifications of RPFs or biological technicians.

- 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 for each treatment project, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological 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, CNDDB, 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 Biological Resources Discussion 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:

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).

   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.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

# PROJECT-SPECIFIC IMPLEMENTATION

## Special-Status Plants

- To avoid impacts without implementation of protocol-level surveys described under SPR BIO-7 on the non-ESA-listed and non-CESA-listed annual and perennial geophyte species identified in Table B-2 of Attachment B, in treatment areas where species with these lifeforms are the only special-status plant species with potential to occur, only non-ground-disturbing treatment activities (i.e., manual treatments, broadcast burning) will be implemented and only during the dormant season for these species (i.e., when the plant has no aboveground parts), which would typically occur after seed set and before germination, if feasible. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October–December (Levine et. al 2008). If the limited operating period for annual and perennial geophyte species (i.e., only non-ground-disturbing treatment activities conducted only during the dormant season) is determined to be infeasible, then protocol-level surveys will be required per SPR BIO-7. Note that ground-disturbing treatment activities (i.e., mechanical treatments, pile burning) may result in impacts on these plant species even when dormant, and will not be conducted without prior implementation of SPR BIO-7).

## Special-Status Wildlife

- To avoid impacts on Cascades frog, Pacific tailed frog, and southern torrent salamander, a no-disturbance buffer of 20 feet will be implemented adjacent to all perennial (i.e., Class I and Class II) streams, seeps, ponds, and wet meadows, if feasible. If the 20-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented within suitable habitat areas.
- To avoid impacts on foothill yellow-legged frog, a no-disturbance buffer of 200 feet will be implemented adjacent to all perennial (i.e., Class I and Class II) streams, if feasible. If the 200-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented within suitable habitat areas.

- To avoid impacts on southern long-toed salamander, a no-disturbance buffer of 330 feet will be implemented adjacent to all perennial (i.e., Class I and Class II) streams and lakes, if feasible. If the 330-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented within suitable habitat areas.
- To avoid impacts on special-status nesting birds (i.e., American peregrine falcon, bald eagle, black swift, golden eagle, northern goshawk, olive-sided flycatcher), a limited operating period for prescribed burning, mechanical treatments, and manual treatments from February 1 to August 31 will be implemented within habitats determined to be suitable for these species by a qualified RPF or biologist, if feasible. If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 will be implemented.
- To avoid impacts on northern spotted owl, the following measures will be implemented:
  - To determine whether a documented northern spotted owl nesting occurrence is present within 0.25 mile of the treatment area, a qualified RPF or biologist will review northern spotted owl occurrence data in the CNDDB and the project proponent will contact U.S. Forest Service biologists from Klamath National Forest and/or Six Rivers National Forest to obtain any recent survey and occurrence data for northern spotted owl that have not been made publicly available (e.g., in the CNDDB).
  - If a previously documented northern spotted owl nesting occurrence is present, a no-disturbance buffer and limited operating period will be implemented around the occurrence. The buffer size and limited operating period will be based on the type of treatment-related disturbances, following USFWS guidance, as follows:
    - *Habitat modification*. For treatment-related activities that modify habitat, including mechanical treatments, manual treatments, and pile burning activities, the no-disturbance buffer will be 0.25 mile around the nesting occurrence; project-related disturbances that modify habitat will be prohibited within this buffer during February 1–September 15.
    - *Loud and continuous noise without habitat modification*. For treatment-related activities that generate loud and continuous noise but do not modify habitat, the starting-point buffer size will be a maximum of 0.25 mile around the nesting occurrence; however, this buffer size may be reduced in consultation with USFWS and CDFW based on site-specific factors such as ambient noise levels, types and levels of existing or ongoing disturbances and land uses, type and intensity of the noise-generating project activity, and topography or other environmental variables that may affect sound attenuation and provide screening between the nesting occurrence and project activities. Project-related disturbances that generate loud and continuous noise without habitat modification will be prohibited within the applicable buffer during February 1–July 9.

  If the limited operating periods for previously reported nesting occurrences are determined to be infeasible without verification of current occupancy or activity by northern spotted owl at the time of treatment implementation (e.g., through protocol-level surveys or confirmation by the data source), then SPR BIO-10, which requires protocol-level surveys prior to treatment activities, will be implemented to determine current occupancy and nesting status and whether the limited operating period and no-disturbance buffer is currently applicable. For example, some previously documented nest records reported in CNDDB, Forest Service data, or other sources may be relatively old and may not reflect current conditions or occupancy by northern spotted owl. If protocol-level surveys are conducted to verify a previously reported nesting occurrence, and current nesting by northern spotted owl is confirmed, then the no-disturbance buffer and limited operating period will apply, as required in SPR BIO-10 and Mitigation Measure BIO-2a. If northern spotted owl nesting is not detected during protocol-level surveys, then the LOP and no-disturbance buffer around a previously reported nesting occurrence would not be required. See SPR BIO-10 for protocol survey specifications.
  - If habitat suitable for northern spotted owl is present in a treatment area with no recent record of surveys or detections, northern spotted owl presence would be assumed, and potential impacts will be avoided by implementing a no-disturbance buffer and limited operating period around the unsurveyed suitable habitat. The buffer and limited operating period specifications will vary by disturbance type and follow those described for nesting occurrences, above. For treatment planning purposes, preliminary identification of

habitat suitable for northern spotted owl in relation to proposed treatment activities may be based on the Forest Service's current and best available habitat suitability model and GIS layer for northern spotted owl (referred to as the NSO-EVEG layer), supplemented by field verification as needed. This habitat model and GIS layer is considered the best available data for preliminarily identifying nesting/roosting and foraging habitat for northern spotted owl in the project area and vicinity.

If the limited operating periods for unsurveyed suitable habitat are determined to be infeasible without determining current occupancy and nesting by northern spotted owl, similar to the options and approach described above for previously reported nesting records, then SPR BIO-10 and protocol-level surveys will be implemented prior to treatment activities to determine current presence or absence of the species and whether the limited operating period and no-disturbance buffer is currently applicable. If protocol-level surveys are conducted and current nesting by northern spotted owl is confirmed, then the no-disturbance buffer and limited operating period will apply, as required in SPR BIO-10 and Mitigation Measure BIO-2a. If northern spotted owl nesting is not detected during protocol-level surveys, then the LOP and no-disturbance buffer would not be required. See SPR BIO-10 for protocol survey specifications.

- To avoid impacts on special-status bumble bees (i.e., Franklin's bumble bee, Suckley's cuckoo bumble bee, western bumble bee), the following measures will be implemented:
    - *Franklin's bumble bee*. Recently, USFWS has identified high priority zones for Franklin's bumble bee based on past observations and habitat conditions surrounding those detection points, potential habitat suitability and the presence of significant floral resources. Currently, nearly all of the project area is located outside the high priority zones identified by USFWS; however, one location in the southernmost portion of the project area overlaps with a high priority zone. In areas identified by USFWS as high priority zones for Franklin's bumble bee, a limited operating period for mechanical treatment or prescribed burning in meadows from May 15 to September 30 will be implemented. For project activities implemented outside of high priority zones, no limited operating period for Franklin's bumble bee is required.

      If the limited operating period for Franklin's bumble bee is determined to be infeasible for certain treatments and meadow sites within USFWS-defined high priority zones while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, then SPR BIO-10 will be implemented to determine presence or absence of Franklin's bumble bee through surveys, in coordination with the USFWS Yreka office, and applicability of the limited operating period. See SPR BIO-10 for Franklin's bumble bee survey specifications.
    - *Western bumble bee and Suckley's cuckoo bumble bee*. A limited operating period for mechanical treatment or prescribed burning in meadows from May 15 to August 31 will be implemented, if feasible. If the limited operating period is determined to be infeasible for certain treatments and meadow sites while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, MKWC may consult with CDFW on a site- or treatment-specific basis to further evaluate whether the limited operating period would be required for a specific meadow site and treatment prescription. If the limited operating period is determined to be required for meadows occupied or potentially occupied by western bumble bee or Suckley's cuckoo bumble bee, MKWC will either: 1) initially implement the limited operating period without further review, or 2) implement SPR BIO-10, which requires surveys to determine presence or absence and confirm the applicability of required protection measures (e.g., the limited operating period) based on presence or absence of the species. See SPR BIO-10 for bumble bee survey specifications.
- To avoid impacts on fisher and Humboldt marten, within habitat determined to be suitable for the species by a qualified RPF or biologist, a limited operating period for mechanical treatments and prescribed burning activities from March 1 to June 30 will be implemented, if feasible. For Humboldt marten, suitable habitat is defined as breeding, denning, resting, and foraging habitat, which corresponds with USFWS's nomenclature and definition of this habitat category. USFWS has described the specific physical or biological features (PBFs) that define

breeding, denning, resting, and foraging habitat, referred to as "PBF 1" (USFWS 2021). For treatment planning purposes, preliminary identification of denning, resting, and foraging habitat (PBF 1) for Humboldt marten in relation to proposed treatment activities may be based on the Forest Service's current and best available habitat suitability model and GIS layer for Humboldt marten, which specifically identifies habitat modeled as PBF 1. Because this GIS habitat layer is derived primarily from remotely-sensed vegetation data and may over- or underestimate actual habitat suitability in specific locations, for treatment areas located within the geographic extent of this layer, site-specific review of aerial imagery and/or field verification to determine whether habitat in the treatment area meets the specific criteria that define PBF 1 will be conducted before treatment implementation, as needed. If conducting some mechanical and prescribed burning treatments outside of the fisher and Humboldt marten maternity season (May 1–June 30) is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented.

- To avoid impacts on ringtail, a limited operating period for mechanical treatments and prescribed burning activities from April 15 to June 30 will be implemented within habitats determined to be suitable for this species by a qualified RPF or biologist, if feasible. If conducting some mechanical and prescribed burning treatments outside of the ringtail maternity season (April 15–June 30) is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented.
- To avoid impacts on special-status bat (i.e., pallid bat, Townsend's big-eared bat) maternity colonies, a limited operating period for mechanical treatments, manual treatments, and prescribed burning from April 1 to August 31 will be implemented within habitats determined to be suitable for these species by a qualified RPF or biologist, if feasible. If it is infeasible to follow the limited operating period, focused or protocol-level surveys will be required per SPR BIO-10.

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 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 *A Manual of California Vegetation* (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.
- 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 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 pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in 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 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 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 the 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 the 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 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 equal or 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., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), 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;
  - include training on *Phytopthora* 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 *Phytoptheras* 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:

  - 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.

# Project-Specific Implementation

- If the limited operating period for annual and perennial geophyte species (i.e., non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys for these species will be conducted prior to implementation of treatments.
- Protocol-level surveys will be conducted for perennial species prior to implementation of treatments.

# 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;
- 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 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.

## Project-Specific Implementation

The Klamath Alliance for Regional Invasive Species Management (KARISM) is a multiagency group composed of non-governmental organizations, tribes, federal agencies (e.g., National Forests), resource conservation districts, and state agencies. Mid Klamath Watershed Council works with partners through KARISM to conserve native plant species and communities through the management of invasive species in the Klamath Region of California. This region warrants its own invasive species management area due to considerations unique to the Klamath Mountains such as remote location, ecological diversity, rugged terrain, and tribal sovereignty. Best practices provided by KARISM will be used during project implementation.

# 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 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.

# Project-Specific Implementation

- If the 20-foot no-disturbance buffer for Cascades frog, Pacific tailed frog, and southern torrent salamander is determined to be infeasible, to avoid impacts on the species, focused visual encounter surveys for these species will be conducted prior to treatment activities within 20 feet of perennial (i.e., Class I and Class II) streams, seeps ponds, and wet meadows. If Cascades frogs, Pacific tailed frogs, or southern torrent salamanders are identified during focused surveys, Mitigation Measure BIO-2a (Cascades frog) and BIO-2b (Pacific tailed frog, southern torrent salamander) will be implemented.
- If the 200-foot no-disturbance buffer for foothill yellow-legged frog is determined to be infeasible, to avoid impacts on the species, focused visual encounter surveys for this species will be conducted prior to treatment activities within 200 feet of perennial (i.e., Class I and Class II) streams. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2b will be implemented.
- If the 330-foot no-disturbance buffer for southern long-toed salamander is determined to be infeasible, to avoid impacts on the species, focused visual encounter surveys for this species will be conducted prior to treatment activities within 330 feet of perennial (i.e., Class I and Class II) streams and lakes. If southern long-toed salamanders are identified during focused surveys, Mitigation Measure BIO-2b will be implemented.
- Because no-disturbance buffers for Scott Bar salamander and Siskiyou Mountains salamander are not feasible, to avoid impacts on these species, focused surveys (i.e., walk and turn surveys) will be conducted in habitat suitable for the species within treatment areas that are within the limited ranges of these species and that contain rocky areas or are located within 50 feet of rocky talus habitat prior to implementing treatment activities. If Scott Bar salamanders or Siskiyou Mountains salamanders are detected during focused surveys, then Mitigation Measure BIO-2a will be implemented.
- Because no-disturbance buffers for western pond turtle are not feasible, to avoid impacts on western pond turtle, focused visual encounter surveys for the species and for potentially suitable burrows will be conducted within habitat areas suitable for the species prior to treatment activities within approximately 1,500 feet of aquatic habitat (i.e., streams, ponds). If burrows potentially suitable for western pond turtle are detected, the RPF or qualified biologist will inspect the burrow to determine whether it is occupied (e.g., using a burrow scope). If western pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species will be implemented.
- If the limited operating period for nesting birds is determined to be infeasible, to avoid impacts on special-status birds (i.e., American peregrine falcon, bald eagle, black swift, golden eagle, northern goshawk, olive-sided flycatcher), focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing treatment activities during the nesting bird season (February 1–August 31). Prior to conducting focused surveys, the project proponent will contact U.S. Forest Service biologists from Klamath National Forest or Six Rivers National Forest to obtain any recent survey and occurrence data for northern goshawk that have not been made publicly available (e.g., in the CNDDB). Nest surveys for northern goshawk will follow established protocols for the species (i.e., *Northern Goshawk Inventory and Monitoring Technical Guide*; US Forest Service 2006). If active special-status bird nests are observed during focused surveys, then mitigation measures BIO-2a (for American peregrine falcon, bald eagle, and golden eagle) and BIO-2b (for black swift, northern goshawk, and olive-sided flycatcher) will be implemented.
- If the limited operating period for northern spotted owl is determined to be infeasible, to avoid impacts on the species, protocol-level surveys for northern spotted owl will be conducted by a qualified RPF or biologist in suitable

nesting habitat within a 0.25-mile buffer surrounding the treatment area prior to implementation of treatment activities. For survey planning purposes, preliminary identification of habitat suitable for northern spotted owl nesting in relation to proposed treatment activities may be based on the Forest Service's current and best available habitat suitability model and GIS layer for northern spotted owl (referred to as the NSO-EVEG layer), supplemented by field verification as needed. Surveys for northern spotted owl will be conducted pursuant to the *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls* (USFWS 2012). If nesting northern spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2a will be implemented.

- If the limited operating period for Franklin's bumble bee is determined to be infeasible for certain treatment and meadow sites within USFWS-defined high priority zones while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, to avoid impacts on the species, SPR BIO-10 will be implemented and focused surveys for Franklin's bumble bee will be conducted in coordination with the USFWS Yreka office prior to implementing mechanical treatments or prescribed burning in meadows. Survey methods will follow procedures outlined in the rusty-patched bumble bee protocol (USFWS 2018) or any subsequently published protocol for or applicable to Franklin's bumble bee. If Franklin's bumble bees are identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.
- If the limited operating period for western bumble bee and Suckley's cuckoo bumble bee is required (see SPR BIO-1) but determined to be infeasible for certain treatment and meadow sites while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, SPR BIO-10 will be implemented and focused surveys for western bumble bee and Suckley's cuckoo bumble bee will be conducted prior to implementing mechanical treatments or prescribed burning in meadows. Survey methods will follow procedures outlined in the rusty-patched bumble bee protocol (USFWS 2018) or any subsequently published protocol for or applicable to western bumble bee and Suckley's cuckoo bumble bee. If western bumble bees or Suckley's cuckoo bumble bees are identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.
- Because no-disturbance buffers and limited operating periods for American badgers are not feasible, to avoid impacts on American badgers, a focused survey for the species and for potential dens will be conducted prior to implementing treatments in habitat suitable for the species (i.e., grassland, open woodland). If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented.
- If the limited operating period for fisher and Humboldt marten is determined to be infeasible, to avoid impacts on the species, focused surveys for fisher and Humboldt marten, including non-invasive survey methods (e.g., trail cameras, track plates, hair snares), will be conducted prior to implementing mechanical treatments and prescribed burning during the fisher and Humboldt marten maternity season (May 1–June 30) within habitat suitable for the species. For Humboldt marten, suitable habitat is defined as denning, resting, and foraging habitat, which corresponds with USFWS's nomenclature and definition of this habitat category. USFWS has described the specific physical or biological features (PBFs) that define breeding, denning, resting, and foraging habitat, referred to as "PBF 1" (USFWS 2021). For survey planning purposes, preliminary identification of denning, resting, and foraging habitat (PBF 1) for Humboldt marten in relation to proposed treatment activities may be based on the Forest Service's current and best available habitat suitability model and GIS layer for Humboldt marten, which specifically identifies habitat modeled as PBF 1. Because this GIS habitat layer is derived primarily from remotely-sensed vegetation data and may over- or underestimate actual habitat suitability in specific locations, for treatment areas located within the geographic extent of this layer, site-specific review of aerial imagery and/or field verification to determine whether habitat in the treatment area meets the specific criteria that define PBF 1 will be conducted before treatment implementation, as needed. Because no formal survey protocol for determining Humboldt marten presence/absence or den locations has been developed and adopted, MKWC will request from USFWS review or input on the survey design and protocol proposed for a treatment area before initiating marten surveys. If presence of fisher or Humboldt marten is assumed in lieu of conducting surveys, or an active den is identified during focused surveys by a qualified RPF or biologist, mitigation measures BIO-2a (for Humboldt marten) and BIO-2b (for fisher) will be implemented.

- Gray Wolf
  - Because no-disturbance buffers and limited operating periods for gray wolf are not feasible, to avoid impacts on gray wolf, the following measures will be implemented:
    - To determine whether gray wolves have been documented in or in the vicinity of a treatment area, a qualified RPF or biologist will contact CDFW (Kent Laudon, Kent.Laudon@wildlife.ca.gov, 530.215.0751) before implementation of treatment activities to obtain general information about documented gray wolf activity within or in the vicinity of a treatment area that has not been made publicly available.
    - If gray wolf activity (e.g., occurrences or overlapping home range) has been documented in a treatment area, pursuant to information provided by CDFW, then treatment activities will not be initiated in the treatment area until CDFW have provided further guidance. Mitigation Measure BIO-2a will be implemented.
    - If gray wolf activity has not been documented in a treatment area and the treatment area does not overlap the home range of a documented gray wolf or gray wolf pack pursuant to information provided by CDFW, and these agencies concur that the species is unlikely to occur in the treatment area, then the project will proceed without surveys.
    - If gray wolf occurrences have not been documented in a treatment area and the treatment area does not overlap a home range for a documented gray wolf or gray wolf pack, but presence of gray wolves cannot be ruled out by CDFW (e.g., a documented home range is close to the treatment area, there is otherwise not enough information available to rule out potential presence), then focused surveys for gray wolf activity will be conducted within the treatment area and a buffer of 1 mile surrounding the treatment area. Focused surveys will be conducted by a qualified RPF or biologist and will include the use of trail cameras, track plates, and other non-invasive survey methods to determine whether gray wolves are present in a treatment area. If the species is detected during focused surveys, then Mitigation Measure BIO-2a will be implemented and treatment activities will not be initiated in the treatment area until CDFW have provided further guidance. Additional surveys may be required to determine whether an active gray wolf natal den or rendezvous site is present within or adjacent to a treatment area.
    - If an active den or rendezvous site is detected in or adjacent to a treatment area, then Mitigation Measure BIO-2a will apply.

- If the limited operating period for ringtail is determined to be infeasible, to avoid impacts on the species, focused surveys for ringtail, including non-invasive survey methods (e.g., trail cameras, track plates, hair snares), will be conducted within habitat suitable for the species prior to implementing mechanical treatments and prescribed burning during the ringtail maternity season (April 15–June 30). If presence of ringtail is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.
- If the limited operating period for special-status bats is determined to be infeasible, to avoid impacts on special-status bats (i.e., pallid bat, Townsend's big-eared bat), focused surveys for maternity roosts of these species will be conducted prior to implementing prescribed burning, mechanical treatments, or manual treatments during the bat maternity season (April 1–August 31). If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats will be implemented.
- 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, or biological technician will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, 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 measures:

- 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 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.

- MM 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 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 (and associated use of 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.

- MM 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, 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 (and associated use of 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 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.

- MM 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.

  Avoid Mortality, Injury, or Disturbance of Individuals

  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.

Maintain Habitat Function

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; 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.

# Project-Specific Implementation

- If Cascades frog, Scott Bar salamander, or Siskiyou Mountains salamander are detected during focused surveys, the project proponent will require flagging areas for avoidance in which no treatment activities will occur, installation of exclusionary fencing, biological monitoring, or other measures recommended by CDFW as necessary to avoid injury to or mortality of individuals of these species. If impacts will remain significant under CEQA and the project proponent determines that additional mitigation is necessary to reduce significant impacts, Mitigation Measure BIO-2c will be required, and incidental take permitting under CESA may be required pursuant to consultation with CDFW.

- If nesting northern spotted owls are identified during protocol-level surveys, a no-disturbance buffer and limited operating period (LOP) will be implemented around the nest site. The buffer size and LOP will be based on the type of treatment-related disturbances, following USFWS guidance, as follows:
    - *Habitat modification*. For treatment-related activities that modify habitat, including mechanical treatments, manual treatments, and pile burning activities, the no-disturbance buffer will be 0.25 mile around the nest site; project-related disturbances that modify habitat will be prohibited within this buffer during February 1–September 15.
    - *Loud and continuous noise without habitat modification*. For treatment-related activities that generate loud and continuous noise but do not modify habitat, the starting-point buffer size will be a maximum of 0.25 mile around the nest site; however, this buffer size may be reduced in consultation with USFWS and CDFW based on site-specific factors such as ambient noise levels, types and levels of existing or ongoing disturbances and land uses, type and intensity of the noise-generating project activity, and topography or other environmental variables that may affect sound attenuation and provide screening between the nest site and project activities. Project-related disturbances that generate loud and continuous noise without habitat modification will be prohibited within the applicable buffer during February 1–July 9.
- If Franklin's bumble bee, western bumble bee, or Suckley's cuckoo bumble bee are detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around any identified nesting or overwintering sites, and no treatment activities will occur within this buffer until the nesting or overwintering site is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW and USFWS.
- If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of at least 0.5 mile will be established around active American peregrine falcon, bald eagle, and golden eagle nests; and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle nests will not be removed pursuant to the Bald and Golden Eagle Protection Act.
- <u>Gray Wolf</u>
    - If an active natal den or rendezvous site is identified by a qualified RPF or biologist during focused surveys or any time during project implementation, then CDFW will be contacted immediately, and a no-disturbance buffer of at least one mile will be established around these features within which no treatment activities would occur. No-disturbance buffers may be larger and irregularly shaped, based on topography and concerns for revealing the exact site location.
    - No activities that create loud and continuous noise will occur within the no-disturbance buffer through June 30 for a natal den site or through August 31 for a rendezvous site pursuant to discussion and coordination with CDFW, which may result in modified distances or more flexible dates.
- If an active Humboldt marten den is detected during focused surveys or otherwise reported and confirmed, a no-disturbance buffer of at least 0.25 mile will be established around the den, and no treatment activities will occur within this buffer until the den is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW and USFWS.
- <u>Ringtail</u>
    - If the limited operating period for ringtail is determined to be infeasible and ringtails are detected during focused surveys implemented under SPR BIO-10, then additional surveys will be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist. A no disturbance buffer will be established around the den, the size of which will be determined through consultation with CDFW.
    - If the limited operating period for ringtail is determined to be infeasible and presence of ringtails is assumed, then the following avoidance and minimization measures will be required:

- Den Surveys. Within seven days prior to the start of mechanical treatments and prescribed burning during the ringtail maternity season (April 15–June 30), a qualified RPF or biologist will conduct a den search in the treatment area to be treated the next week. The qualified RPF or biologist will search for large trees (i.e., greater than 12 inches diameter at breast height [dbh]) with appropriate cavities (i.e., holes larger than 3 inches in diameter, cavities extending approximately 12 inches down from the cavity hole). If found, the qualified RPF or biologist will inspect the cavity using a cell phone with a flash, or other tools (e.g., borescopes) to determine whether ringtails are present. Areas (e.g., large trees) with appropriate den habitat, occupied or not, will be marked (i.e., with flagging, spray paint), for inspection during future sweeps (as described below). The qualified RPF or biologist will also search for dens in dense shrub habitat and will note any sightings of fleeing adult ringtails.
- Active Dens. If active ringtail dens are discovered during a den survey or daily sweep, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and mechanical treatments or prescribed burning will not proceed within the buffer until at least the end of the ringtail maternity season (April 15–June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. The 0.25-mile buffer will incorporate the den and an area greater than the typical ringtail home range in northern California (Wyatt, pers. comm., 2021). If an active den is discovered, CDFW (Cary Japp, Cary.Japp@wildlife.ca.gov; Andre Benoist, Andre.Benoist@wildlife.ca.gov) will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer.
- Daily Sweeps, Training, and Monitoring. If active ringtail dens are not discovered, the following measures will be implemented to avoid inadvertent destruction of active dens that eluded detection during the den search as well as take of adult ringtails and kits.
- Daily Sweeps. On the first morning of work for mechanical treatments prescribed burning, a qualified RPF or biologist will conduct a sweep of the area to be treated that and will search all habitat suitable for ringtails where mastication will occur that day (i.e., larger trees, dense brush, rock piles) for active dens or adults, including the trees with cavities previously marked by the qualified RPF or biologist. On following days, a trained contractor will search all areas previously marked by the qualified RPF or biologist for active dens (see training requirements below under "Training and Monitoring"). If an active den is discovered during a daily sweep, the qualified RPF or biologist will be notified, all work will stop, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and the requirements described above under "Active Dens" will be followed.
- Training and Monitoring. On the first morning of work for mechanical treatments or prescribed burning, the qualified RPF or biologist will provide biological resource training (as required under CalVTP PEIR SPR BIO-2) for all contractors. In addition to standard biological resource training, the qualified RPF or biologist will provide additional training specific to ringtail that will include the following elements:
  - Description of ringtail appearance (i.e., physical features, typical size);
  - Description of typical ringtail behavior;
  - Description of denning habitat suitable for ringtail, particularly in that week's treatment area. The approximate location of large trees with cavities that were previously marked will be noted;
  - Measures required during operation, including daily sweeps of habitat suitable for ringtail where mastication will occur that day (i.e., dense brush habitat, previously marked tree cavities), take avoidance measures, and required increased vigilance when operating in dense brush;
  - Measures required if a ringtail is spotted (i.e., all work halts until a qualified RPF or biologist can conduct a den search and sweep; if the qualified RPF or biologist observes a ringtail or confirms the contractor's observation, the occurrence will be reported to CDFW at Cary.Japp@wildlife.ca.gov and Andre Benoist, Andre.Benoist@wildlife.ca.gov);

- Measures required if a ringtail den is found (i.e., 0.25-mile no-disturbance buffer and requirements described above under "Active Dens" will be followed);
- Definition of and legal consequences for take of ringtail (i.e., $10,000 fine for each take and/or 1 year in jail); and
- Requirements for contacting CDFW (Cary.Japp@wildlife.ca.gov; Andre Benoist, Andre.Benoist@wildlife.ca.gov), which include the following circumstances:
  - ringtails observed during treatment activities (notify within 3 business days);
  - active ringtail den discovered (notify within 24 hours); and take of ringtail occurs (notify within 24 hours).

- MM 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.

  Avoid Mortality, Injury, or Disturbance of Individuals

  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 may will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment if the treatment activity has the potential to result in mortality, injury, or disturbance. 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 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.

Maintain Habitat Function

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 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.

# Project-Specific Implementation

- If foothill yellow-legged frogs, Pacific tailed frogs, southern long-toed salamanders, southern torrent salamanders, or western pond turtles are detected during focused surveys, the project proponent will require flagging areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW

scientific collecting permit, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species.

- If active special-status bird nests are detected during focused surveys, a no-disturbance buffer of at least 0.25 mile for northern goshawk nests and at least 100 feet for black swift and olive-sided flycatcher will be established, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist.
- If an active American badger den is detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around the den, and no treatment activities will occur within this buffer until the den is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.
- If an active fisher den is detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around the den, and no treatment activities will occur within this buffer until the den is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.
- If an active pallid bat or Townsend's big-eared bat roost is detected during focused surveys, then a no-disturbance buffer of 250 feet will be established around the roost, and mechanical treatments, manual treatments, and prescribed burning will not occur within this buffer.
- MM 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 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.

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.

  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), and the substantial evidence will be included in the PSA. 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**

| Butterfly Species | Host Plants |
|---|---|
| bay checkerspot butterfly | dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*) |
| Behren's silverspot butterfly | blue violet (*Viola adunca*) |
| callippe silverspot butterfly | California golden violet (*Viola pedunculata*) |
| Carson wandering skipper | salt grass (*Distichlis spicata*) |
| El Segundo blue butterfly | seacliff buckwheat (*Eriogonum parvifolium*) |
| Hermes copper butterfly | spiny redberry (*Rhamnus crocea*) |
| Kern primrose sphinx moth | plains evening-primrose (*Camissonia contorta*), field primrose (*Camissonia campestris*) |
| Laguna Mountains skipper | Cleveland's horkelia (*Horkelia clevelandii*), sticky cinquefoil (*Drymocallis glandulosa*) |
| Lange's metalmark butterfly | naked-stemmed buckwheat (*Eriogonum nudum*) |
| lotis blue butterfly | seaside bird's foot trefoil (*Hosackia gracilis*) |
| Mission blue butterfly | lupine (*Lupinus* spp.) |
| Myrtle's silverspot butterfly | blue violet |
| Oregon silverspot butterfly | blue violet |
| Palos Verdes blue butterfly | Santa Barbara milkvetch (*Astragalus trichopodus*), common deerweed (*Acmispon glaber*) |
| San Bruno elfin butterfly | broadleaf stonecrop (*Sedum spathulifolium*), manzanita (*Arctostaphylos* spp.), huckleberry (*Vaccinuum* spp.) |
| Smith's blue butterfly | seacliff buckwheat, seaside buckwheat (*Eriogonum latifolium*) |
| Quino checkerspot butterfly | dwarf plantain, purple owl's clover |

- MM 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. [*see Project-Specific Implementation information and MM BIO-2a*]. Burning in March, June, July and October within suitable habitat may be allowed through consultation with CDFW.
  - 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 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 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.

# Project-Specific Implementation

The project proponent will implement the LOPs for Franklin's bumble bee, western bumble bee, and Suckley's cuckoo bumble bee, if required, as explained under project-specific implementation information for the avoidance and minimization components of Mitigation Measure BIO-2a.

- MM 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 *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (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 *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (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 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 Fire in California's Ecosystems (Van Wagtendonk et al. 2018) and the Manual of California Vegetation (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 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.

- MM 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:
    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.

- MM 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 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.

- MM 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 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 (and associated use of accelerants) will occur within the wetland buffer, with the exception of meadows within which ignition may occur using propane torches or traditional methods (e.g., pitch sticks or grass bundles) only.

- MM 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 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.

# EC-6: GEOLOGY, SOILS, AND MINERAL RESOURCE STANDARD PROJECT REQUIREMENTS

- SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical~~,~~ and 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. ~~if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours~~ The project proponent will be prepared to completely suspend mechanical and prescribed herbivory~~, and herbicide treatment~~ activities prior to the initiation of the rain event. 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, or (6) tire track imprints or hoof marks in the soil. This SPR applies only to mechanical and prescribed herbivory treatment activities and all treatment types, including treatment maintenance.
- 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.

- 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 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.

# PROJECT-SPECIFIC IMPLEMENTATION

Some prescribed burning treatments that would result in exposure of bare soils over greater than 50 percent of a treatment area would be conducted in areas with an existing canopy of broadleaved trees. In these areas, leaf little covers areas of bare soil rapidly, providing natural stabilization of soils. In these areas, the risk of substantial erosion or landslide following prescribed burning activities would be low, and implementation of SPR GEO-3 may not be required.

- 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.
- 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.
- 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.
- 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.

- 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 identity 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.

# EC-7: 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 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.
- MM 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 *National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire* (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 bio-oil 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.

# EC-8: ENERGY

- NONE

# EC-9: 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.
- 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.
- SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one backpack pump-type fire extinguisher filled with water ~~per chainsaw.~~ and each vehicle would be equipped with the required hand tools for firefighting ~~one long-handled shovel and one axe or Pulaski~~ consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.
- 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.
- MM 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.

# EC-10: HYDROLOGY AND WATER QUALITY STANDARD PROJECT REQUIREMENTS

- **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. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
- **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.
- **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**

| 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. |
| WLPZ Width (ft) – Distance from top of bank to the edge of the protection zone | | | | |
| < 30 % Slope | 75 | 50 | Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis. | |
| 30-50 % Slope | 100 | 75 | | |
| >50 % Slope | 150 | 100 | | |

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 (~~n~~or use of associated accelerants) will not occur within WLPZs, except in meadows, within which ignition may occur using propane torches, or traditional methods including pitch sticks or grass bundles only. ~~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 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-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 ensure that restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

# EC-11: LAND USE AND PLANNING, POPULATION AND HOUSING

- NONE

# EC-12: 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.
- 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.
- 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.
- 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.
- 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 trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
- 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.

# EC-13: 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.

# EC-14: 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 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, if required. 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.

## PROJECT-SPECIFIC IMPLEMENTATION

The project proponent will engage with the agency(ies) with jurisdiction over roadways that could be affected by treatment activities prior to initiating implementation of the project. The project proponent will provide an overview of the proposed treatment types and activities that would occur in close proximity to public roads with the agency(ies) to determine the level of traffic control required for the project. A TMP may not be required for the project and in this case, the project proponent would proceed with the proposed vegetation treatment activities with no additional engagement with the agency(ies) with jurisdiction over roadways in the project area.

# EC-15: 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.

# EC-16: WILDFIRE

- NONE

# EC-17: ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

- SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE would meet with the Mid Klamath Watershed Council 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 would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.
- 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.
- 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.
- SPR AD-4 Public Notifications for Prescribed Burning: At least ~~three~~ one day~~s~~ 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. 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 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~~ During this outreach the project proponent will describe~~ing~~ 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.

- 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.
- 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);
  - treatment types and activities; and
  - contact information for a representative of the project proponent.

  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.

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# Attachment B

## Biological Resources

# VEGETATION AND HABITAT

Pursuant to SPR BIO-1, Ascent biologists conducted a data review of project-specific biological resources, including habitat and vegetation types, special-status plants, special-status wildlife, sensitive natural communities, and sensitive habitats (e.g., chaparral, wetland and riparian habitats) with potential to occur in the project area. CAL FIRE Fire Resource and Assessment Program (FRAP) vegetation mapping was used to identify the habitat types within the project area and is the best available, current vegetation mapping data for the project area.

The project area is located mostly within the Klamath Mountains ecoregion; a small piece of the southwestern section of the project area is in the Northern California Coast Range ecoregion. Most of the project area is in Siskiyou County and the southwest section is located in Humboldt County. Siskiyou County land is 83 percent forested habitat (Siskiyou County 1973). The project area ranges in elevation from approximately 300 feet to 7,300 feet. Habitat types within the project area and total acreage of each type are presented in Table B-1.

**Table B-1 Habitat Types in the Project Area[1]**

| Habitat Type | WUI Fuel Reduction (Acres) | Ecological Restoration (Acres) | Total (Acres) |
|---|---|---|---|
| **Forest/Woodland** | | | |
| Blue Oak-Foothill Pine | 0.1 | 0.0 | **0.1** |
| Coastal Oak Woodland | 205.3 | 0.6 | **205.9** |
| Douglas Fir | 7,774.3 | 1,590.8 | **9,365.2** |
| Jeffrey Pine | 19.7 | 53.4 | **73.1** |
| Klamath Mixed Conifer | 1,040.7 | 1,306.7 | **2,347.3** |
| Montane Hardwood | 2,099.5 | 202.1 | **2,301.6** |
| Montane Hardwood-Conifer | 6,015.3 | 1,062.1 | **7,077.4** |
| Ponderosa Pine | 1,027.9 | 119.1 | **1,147.0** |
| Red Fir | 166.0 | 339.8 | **505.8** |
| Subalpine Conifer | 9.2 | 103.0 | **112.2** |
| White Fir | 223.1 | 1,058.5 | **1,281.6** |
| **Forest/Woodland Total** | ***18,581.1*** | ***5,836.1*** | ***24,417.2*** |
| **Shrub/Scrub** | | | |
| Mixed Chaparral | 461.0 | 36.4 | **497.4** |
| Montane Chaparral | 409.0 | 289.4 | **698.4** |
| **Shrub/Scrub Total** | ***870.0*** | ***325.8*** | ***1,195.8*** |
| **Herbaceous** | | | |
| Annual Grassland | 2,022.6 | 96.2 | **2,118.9** |
| Perennial Grassland | 107.0 | 57.9 | **164.9** |
| **Herbaceous Total** | ***2,129.6*** | ***154.1*** | ***2,283.8*** |
| **Wetland/Riparian** | | | |
| Lacustrine | 66.3 | 34.6 | **100.9** |
| Montane Riparian | 496.3 | 54.5 | **550.8** |
| Riverine | 562.6 | 10.3 | **572.8** |
| Valley Foothill Riparian | 37.4 | 0.0 | **37.4** |
| Wet Meadow | 42.5 | 6.6 | **49.1** |
| **Wetland/Riparian Total** | ***1,205.1*** | ***106.0*** | ***1,310.9*** |

| Habitat Type | WUI Fuel Reduction (Acres) | Ecological Restoration (Acres) | Total (Acres) |
|---|---|---|---|
| **Agricultural** [2] | | | |
| Cropland | 238.7 | 0.0 | **238.7** |
| Deciduous Orchard | 7.6 | 0.0 | **7.6** |
| Irrigated Hayfield | 80.6 | 0.0 | **80.6** |
| Pasture | 155.8 | 0.0 | **155.8** |
| **Agricultural Total** | *482.6* | *0.0* | *482.7* |
| **Developed/Disturbed/Barren**[2] | | | |
| Barren | 407.4 | 63.0 | **470.4** |
| Urban | 759.2 | 4.3 | **1,073.9** |
| **Developed/Disturbed/Barren Total** | *1,477.0* | *67.3* | *1,544.3* |
| **All Habitat Types Total** | **24,745.3** | **6,489.1** | **31,234.5** |

[1] Numbers may not add up to subtotals/totals precisely due to rounding.

[2] Most urban, barren, and agricultural habitats would not be targeted for treatment; however, due to the scale of the habitat mapping, some areas mapped as urban, barren, or agricultural may contain habitats that would be treated (e.g., forested areas close to urban or agricultural development).

Source: CAL FIRE FRAP vegetation data, compiled by Ascent Environmental in 2022.

# SPECIAL-STATUS SPECIES

A list of special-status plant and wildlife species with potential to occur in the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the U.S. Geological Survey (USGS) quadrangles containing and surrounding the project area (72 quadrangles total; CNDDB 2022; CNPS 2022); the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2022a); *Siskiyou County General Plan Conservation Element* (Siskiyou County 1973); *Humboldt County General Plan* (Humboldt County 2017); and Appendix BIO-3 (Table 5a, Table 5b, Table 10a, Table 10b, and Table 19) in the PEIR (Volume II) for special-status plants and wildlife that could occur in the Klamath Mountains and Northern California Coast Range ecoregions. A list of sensitive natural communities with potential to occur in the project area was compiled by completing a CNDDB search of the 72 USGS quadrangles containing and surrounding the project area (CNDDB 2022) and reviewing Table 3.6-11 (pages 3.6-47 – 3.6-49) and Table 3.6-18 (pages 3.6-70 – 3.6-71) in the PEIR (Volume II) for sensitive natural communities that could occur in the Klamath Mountains and Northern California Coast Range ecoregions in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys on February 24–25, 2023, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible, and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, and habitat present within the project area as assessed during reconnaissance surveys, a list of all species with potential to occur in the vicinity of the proposed project was assembled (Table B-2). It was determined that 106 of the special-status plant and 31 of the special-status wildlife taxa from the full list of species have potential to occur in the project area and four special-status plants are known to occur in the project area (Table B-2).

# SPECIAL-STATUS PLANTS

In Table B-2, location references for special-status plants correspond to "Areas" identified in Figure 1 of the PSA/Addendum. Regarding distances between a treatment area and a plant occurrence, closer occurrences do not necessarily represent an increased likelihood for a plant to occur in a treatment area. Of the 106 special-status plant species that are known or have potential to occur in the project area, 13 species – including Oregon fireweed (*Epilobium oreganum*), Pickering's ivesia (*Ivesia pickeringii*), and porcupine sedge (*Carex hystericina*)– are typically associated with wetlands (e.g., freshwater emergent wetlands, freshwater forested/shrub wetlands, springs, seeps, wet meadows) (Table B-1). Fifty-six special-status plant species –including giant fawn lily (*Erythronium oregonum*), Hooker's catchfly (*Silene hookeri*), and Siskiyou phacelia (*Phacelia leonis*)– are associated with upland habitats that are present in the project area. The remaining 37 special-status plant species –including Siskiyou paintbrush (*Castilleja elata*), Engelmann spruce (*Picea engelmannii*), and Siskiyou clover (*Trifolium siskiyouense*)– are facultative species, meaning they may be found in both wetland and upland habitats (Table B-1).

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants would be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a, or current version) prior to implementing prescribed burning, mechanical treatment, and manual treatment in any habitat potentially suitable for special-status plants. If special-status plant species are found during implementation of SPR BIO-7, Mitigation Measure BIO-1a and/or Mitigation Measure BIO-1b would be required, and no-disturbance buffers would be established around the area occupied by special-status plants. For special-status plants that are not listed under CESA or ESA, treatments may be conducted within occupied habitat 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.

31of the 106 special-status plant species that may occur within the project area are herbaceous annual species or geophytes, as indicated in Table B-2. Impacts on these species would be avoided by treatment activities that do not kill or remove vegetation or disturb the soil (i.e., manual treatment, prescribed burning) only during the dormant season (i.e., when the plant has no aboveground living parts), which would typically occur after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October–December (Levine et. al 2008). Treatment activities that could potentially kill or remove seeds, stumps, and underground root structures (i.e., mechanical treatments) may result in impacts on these plant species even when dormant and would not be conducted without prior implementation of SPR BIO-7. If treatments that do not kill or remove vegetation or disturb the soil (e.g., manual treatments, prescribed burning) cannot be completed in the dormant season and would be implemented during the growing period of annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified special-status plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented. Seventy-five of the 106 special-status plant species that have potential to occur within the project area are perennial species, which could not be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes; therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify them prior to implementing treatment activities regardless of the timing of treatments.

Where protocol-level surveys are required (pursuant to SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a or BIO-1b, depending on species status, would be implemented to avoid loss of and resultant significant impacts on, identified special-status plants. Pursuant to Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which prescribed burning, mechanical treatment, and manual treatment would not occur unless a qualified RPF or biologist determines, based on substantial evidence, that the species would benefit from the proposed treatment in the occupied habitat area. In the case of plants listed pursuant to ESA or CESA, the determination of beneficial effects would need to be made in consultation with the California Department of Fish and Wildlife (CDFW) and/or USFWS, depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants,

under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants would be carried out by a qualified RPF or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance, maintain habitat function for the special-status plant species present.

# SPECIAL-STATUS WILDLIFE

Mitigation Measures BIO-2a and BIO-2b require that treatment activities be designed to maintain habitat function for special-status wildlife species. Habitat function for special-status wildlife species associated with forest or woodland habitats would be maintained because treatment activities and maintenance treatments would not result in removal of trees greater than 12 inches dbh (which would be the most likely features used by denning [e.g., fisher, Humboldt marten, ringtail], nesting [e.g., bald eagle, golden eagle, northern goshawk, northern spotted owl, olive-sided flycatcher], or roosting [e.g., pallid bat, Townsend's big-eared bat] wildlife), conifer trees greater than 12 inches dbh and up to 24 inches dbh that would be removed for instream fish habitat restoration projects would not be removed from habitats suitable for wildlife species associated with late seral forest habitats or species that may nest or den in large conifers as determined by a qualified RPF or biologist, and would retain a sufficient number of small-diameter trees to maintain age-class diversity and facilitate tree recruitment and forest regeneration over time. Further, average canopy cover in forest habitats would be maintained at 40–60 percent (and a minimum of 60 percent for forest habitats determined to be occupied by northern spotted owl), and retention standards for down logs and snags would be implemented, which would maintain habitat function for wildlife species associated with late seral forest habitats (e.g., northern spotted owl, northern goshawk, fisher, gray wolf, Humboldt marten) and species that use down logs for nesting or cover (e.g., Franklin's bumble bee, Suckley's cuckoo bumble bee, western bumble bee, Scott Bar salamander, Siskiyou Mountains salamander).

Treatments would not result in type conversion (i.e., forest to shrub, shrub to herbaceous) through implementation of tree retention parameters and SPRs, and the entire project area would not be treated at once, so landscape-level effects on habitat function would not be expected to occur, and thus habitat function would be maintained for special-status wildlife species with large home ranges (e.g., monarch, gray wolf, Roosevelt elk). Grassland cover types in the project area would be maintained and additional open woodland habitat would likely be restored through thinning and removal of ladder fuels, which would maintain habitat function for American badger. Further, "retention patches" within large treatment areas would be established in some areas to maintain 0.25- to 1-acre patches of existing forest canopy. Where woodrat (*Neotoma* spp.) nests are present, retention patches would be established and all tanoak sprouts less than 4 inches dbh would be cut to encourage resprouting and to create future woodrat habitat where appropriate. Because woodrat is an important prey item for several special-status wildlife species (e.g., northern spotted owl, fisher, Humboldt marten), woodrat habitat retention is expected to benefit or maintain foraging habitat for these predators.

Treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4, treatments within stream WLPZs adjacent to the treatment area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover), which would maintain habitat function for amphibian and reptile species associated with aquatic or riparian habitat (e.g., Cascades frog, foothill yellow-legged frog, Pacific tailed frog, southern long-toed salamander, western pond turtle) and species that may use riparian corridors for movement (e.g., gray wolf, ringtail). Additionally, because treatments would not target rocky habitats or talus slopes, habitat function for Scott Bar salamander and Siskiyou Mountains salamander would not be impaired by project implementation.

**Table B-2 Special-Status Species Known to Occur in the Project Region and their Potential for Occurrence in the Project Area**

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
|---|---|---|---|---|---|
| **Plants** | | | | | |
| Pacific silver fir *Abies amabilis* | — | — | 2B.3 | Upper montane coniferous forest. 5,570–7,200 feet in elevation. Perennial. | ***Known to occur***. *Abies amabilis* has a documented occurrence in the project area in Somes Bar Area (CNDDB 2022). Coniferous forest habitat potentially suitable for this species is present in the project area. *Abies amabilis* has over 20 documented occurrences in proximity to the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Abies amabilis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Subalpine fir *Abies lasiocarpa* var. *lasiocarpa* | — | — | 2B.3 | Upper montane coniferous forest, subalpine coniferous forest, meadows and seeps. Known only from Siskiyou County in California. 4,000–7,200 feet in elevation. Perennial. | *May occur*. Coniferous forest and meadow and seep habitat potentially suitable for this species is present in the project area. *Abies lasiocarpa* var. *lasiocarpa* has approximately 20 documented occurrences in proximity to the project area in Somes Bar and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 1 mile north of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Abies lasiocarpa* var. *lasiocarpa*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Cut-leaf anemone *Anemone multifida* var. *multifida* | — | — | 2B.2 | Subalpine coniferous forest, upper montane coniferous forest, lower montane coniferous forest. Rocky, gravelly. 5,580–9,020 feet in elevation. Blooms June–July. Perennial. | *May occur*. Coniferous forest habitat with gravelly soils potentially suitable for this species is present in the project area. *Anemone multifida* var. *multifida* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, and Somes Bar area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 2 miles northwest of the project area and a documented historical occurrence 1 mile northeast of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Anemone multifida* var. *multifida*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Scabrid alpine tarplant *Anisocarpus scabridus* | — | — | 1B.3 | Upper montane coniferous forest. Open ridges or slopes on metamorphics. 5,410–7,550 feet in elevation. Blooms July–August. Perennial. | *May occur*. Coniferous forest habitat on ridges and slopes with metamorphic soils potentially suitable for this species is present in the project area. *Anisocarpus scabridus* has documented occurrences in proximity to the project area in the Salmon River Area (Calflora 2022; CNNDB 2022). This includes a documented occurrence approximately 11 miles southeast of the project area in the Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Anisocarpus scabridus*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Sawyer's pussy-toes *Antennaria sawyeri* | — | — | 1B.2 | Open, subalpine, serpentine slopes, ridges. Usually north-facing slopes with late spring snowpack, sometimes gravelly, rocky. *Antennaria sawyeri* has been documented on ultramafic soils. 6,810–7,970 feet in elevation. Blooms June–August. Perennial. | *May occur*. Open slope and ridge habitat with serpentine substrate potentially suitable for this species is present in the project area. *Antennaria sawyeri* has documented occurrences in proximity to the project area in the Salmon River Area (CNNDB 2022). This includes a documented occurrence approximately 6 miles south of the project area in the Salmon River Area on rocky ultramafic soils (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Antennaria sawyeri*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Waldo rockcress *Arabis aculeolata* | — | — | 2B.2 | Broadleafed upland forest, lower montane coniferous forest, upper montane coniferous forest. Serpentine slopes and ridges. 1,340–5,910 feet in elevation. Blooms April–June. Perennial. | *May occur*. Slope and ridge habitat with serpentine substrate potentially suitable for this species is present in the project area. *Arabis aculeolata* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, and Somes Bar Areas (CCH2 2022; CNDDB 2022). This includes a documented occurrence 6 miles west of the project area in Happy Camp Area and a documented occurrence directly adjacent to the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Arabis aculeolata*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Mcdonald's rockcress *Arabis mcdonaldiana* | FE | SE | 1B.1 | Lower montane coniferous forest, upper montane coniferous forest. Rocky outcrops, ridges, slopes, and flats on serpentine. 440–5,910 feet in elevation. Blooms May–July. Perennial. | *May occur*. Coniferous forest with serpentine substrate habitat potentially suitable for this species is present in the project area. *Arabis mcdonaldiana* has documented occurrences, in proximity to the Happy Camp Area (CNDDB 2022). This includes a documented occurrence approximately 6 miles southwest of the project area in Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Arabis mcdonaldiana*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Trinity Mountains rockcress *Arabis rigidissima* var. *rigidissima* | — | — | 1B.3 | Upper montane coniferous forest. Open, rocky places. 4,150–6,810 feet in elevation. Blooms June–August. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Arabis rigidissima* var. *rigidissima* has documented occurrences in proximity to the project area in Somes Bar, Orleans, and Salmon River Areas (CCH2 2022; CNDDB 2022). This includes a documented historical occurrence approximately 1 mile northeast of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Arabis rigidissima* var. *rigidissima*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Klamath manzanita *Arctostaphylos klamathensis* | — | — | 1B.2 | Chaparral (montane), lower montane coniferous forest, upper montane coniferous forest, subalpine coniferous forest. Rocky outcrops. Sometimes on gabbro or serpentine. 4,690–7,380 feet in elevation. Blooms May–August. Perennial. | *May occur*. Rocky outcrops in chaparral and coniferous forest habitat potentially suitable for this species are present in the project area. *Arctostaphylos klamathensis* has documented occurrences in the Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 6 miles east of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Arctostaphylos klamathensis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Marbled wild-ginger *Asarum marmoratum* | — | — | 2B.3 | Understory of coniferous forests. 1,590–5,350 feet in elevation. Blooms April–August. Geophyte. | *May occur*. Conifer forest habitat potentially suitable for this species is present in the project area. *Asarum marmoratum* has documented occurrences in proximity to the Happy Camp Area (CNDDB 2022). This includes a documented historical occurrence approximately 4 miles northwest of the project area in the Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Asarum marmoratum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Bald Mountain milk-vetch *Astragalus umbraticus* | — | — | 2B.2 | Cismontane woodland, lower montane coniferous forest. Dry open oak and pine woodlands; sometimes on roadsides. 690–4,000 feet in elevation. Blooms May–August. Perennial. | *May occur*. Woodland and coniferous forest habitat potentially suitable for this species is present in the project area. This species has documented occurrences in proximity to the project area in Somes Bar and Orleans Areas (CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles northwest of the project area in the Somes Bar area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Astragalus umbraticus*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Woolly balsamroot *Balsamorhiza lanata* | — | — | 1B.2 | Cismontane woodland. Open woodland, grassy slopes. 2,620–6,220 feet in elevation. Blooms April–June. Perennial. | *May occur*. Woodland habitat potentially suitable for this species is present in the project area. This species has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented historical occurrence approximately 8 miles northeast of the project area in the Somes Bar area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Astragalus umbraticus*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Silky balsamroot *Balsamorhiza sericea* | — | — | 1B.3 | Lower montane coniferous forest. Collections from Douglas fir forest and Jeffrey pine forest. Serpentine. 2,790–6,990 feet in elevation. Blooms April–May. Perennial. | *May occur*. Conifer habitat with serpentine substrate potentially suitable for this species is present in the project area. *Balsamorhiza sericea* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). Additionally, this species has documented occurrences in Oregon northwest of the Happy Camp Area (Calflora 2022; CCH2 2022). Treatments could result in direct or indirect adverse effects on *Balsamorhiza sericea*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Koehler's stipitate rockcress *Boechera koehleri* | — | — | 1B.3 | Chaparral, lower montane coniferous forest. Rocky, serpentine substrate. 590–5,970 feet in elevation. Blooms April–July. Perennial. | *May occur*. Chaparral and conifer forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Boechera koehleri* has documented occurrences in proximity to the project area in Seiad and Horse Creek and Happy Camp Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3 miles northwest of the project area in the Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Boechera koehleri*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Rolle's rockcress *Boechera rollei* | — | — | 1B.1 | Upper montane coniferous forest. Among rocks on sparsely vegetated, forested slopes. 5,250–5,905 feet in elevation. Blooms August. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Boechera rollei* has a few documented occurrences in proximity to the project area in Seiad and Horse Creek Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3 northwest of the project area in Seiad and Horse Creek Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Boechera rollei*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Serpentine rockcress *Boechera serpenticola* | — | — | 1B.2 | Lower montane coniferous forest, upper montane coniferous forest. Serpentine ridges and talus. 3,690–6,860 feet in elevation. Blooms March–June. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. Treatments could result in direct or indirect adverse effects on *Boechera serpenticola*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Scalloped moonwort *Botrychium crenulatum* | — | — | 2B.2 | Moist meadows, freshwater marsh, and near creeks. 3,890–10,200 feet in elevation. Blooms June–September. Geophyte. | *May occur*. Moist meadow, wetland, and creekbank habitat potentially suitable for this species is present in the project area. *Botrychium crenulatum* has a documented occurrence approximately 6 miles southeast of the project area in Salmon River Area (CNDDB 2018). Treatments could result in direct or indirect adverse effects on *Botrychium crenulatum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Mingan moonwort *Botrychium minganense* | — | — | 2B.2 | Lower montane coniferous forest, upper montane coniferous forest, bogs and fens, meadows and seeps. Meadows, open forest along streams or around seeps. 3,900–10,810 feet in elevation. Blooms July–September. Geophyte. | *May occur*. Stream and wetland habitat potentially suitable for this species is present in the project area. *Botrychium minganense* has documented occurrences in proximity to the Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Botrychium minganense*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Northwestern moonwort *Botrychium pinnatum* | — | — | 2B.3 | Lower montane coniferous forest, meadows and seeps, upper montane coniferous forest. Creekbanks. 5,400–6,710 feet in elevation. Blooms July–October. Geophyte. | *May occur*. Creekbank habitat potentially suitable for this species is present in the project area. *Botrychium pinnatum* has a historical documented occurrence approximately 6 miles northeast of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Botrychium pinnatum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Rattlesnake fern *Botrypus virginianus* | — | — | 2B.2 | Bogs and fens, lower montane coniferous forest, meadows and seeps, riparian forest. Streambanks. 2,340–4,610 feet in elevation. Blooms June–September. Perennial. | *May occur*. Streambank habitat potentially suitable for this species is present in the project area. *Botrypus virginianus* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles southeast of the project area in the Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Botrypus virginianus*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Green shield-moss *Buxbaumia viridis* | — | — | 2B.2 | 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. Perennial. | *May occur*. Conifer habitat with well-rotted logs potentially suitable for this species is present in the project area. Treatments could result in direct or indirect adverse effects on *Buxbaumia viridis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Wilkin's harebell *Campanula wilkinsiana* | — | — | 1B.2 | Meadows and seeps, upper montane coniferous forest, subalpine coniferous forest. Often on streambanks in meadows. 4,165–8,530 feet in elevation. Blooms July–September. Geophyte. | *May occur*. Coniferous forest with streambank habitat potentially suitable for this species is present in the project area. *Campanula wilkinsiana* has documented occurrences in proximity to the project area in Somes Bar and Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022). This species has a documented historical occurrence adjacent to the project area in the Salmon River Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Campanula wilkinsiana*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Oregon sedge *Carex halliana* | — | — | 2B.3 | Meadows and seeps, subalpine coniferous forest, upper montane coniferous forest. Dry, forest edges, often on pumice. 4,790–6,830 feet in elevation. Blooms July–September. Geophyte. | *May occur*. Coniferous forest and meadow habitat potentially suitable for this species is present in the project area. *Carex halliana* has documented occurrences in proximity to the project area in Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles east of the project area in Somes Bar Area and 1 mile east of the project area in the Orleans Area (Calflora 2022; CCH2 2022). Treatments could result in direct or indirect adverse effects on *Carex halliana*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Porcupine sedge *Carex hystericina* | — | — | 2B.1 | Wet places, such as stream edges. 1,980–3,150 feet in elevation. Blooms May–June. Geophyte. | *May occur*. Wetland and streamside habitat potentially suitable for this species is present in the project area. This species has a documented occurrence adjacent to the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Carex hystericina*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Klamath sedge *Carex klamathensis* | — | — | 1B.2 | Meadows and seeps, chaparral, cismontane woodland. Moist to wet serpentine soils. 2,980–3,740 feet in elevation. Geophyte. | *May occur*. Mesic habitat with serpentine substrate potentially suitable for this species is present in the project area. *Carex klamathensis* has a documented occurrence 9 miles south of project area in Salmon River Area (CCH2 2022). This species has multiple occurrences across the Oregon border northwest of Happy Camp Area (Calflora 2022; CCH2 2022). Treatments could result in direct or indirect adverse effects on *Carex klamathensis*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Nard sedge *Carex nardina* | — | — | 2B.2 | Exposed arctic and alpine tundra, and on calcareous cliffs, rocky slopes, ridges, and summits (NatureServe 2022). 165–10,830 feet in elevation. (NatureServe 2022). Blooms August–September. Perennial. | *May occur*. Rocky slopes, ridges, summits, and carbonate substrate potentially suitable for this species are present in the project area. *Carex nardina* has two documented occurrences directly adjacent to the project area along the Pacific Crest Trail in Somes Bar Area (CNDDB 2022). This species was recently discovered in California by D. York in 2011 (CNPS 2022). Treatments could result in direct or indirect adverse effects on *Carex nardina*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Northern meadow sedge *Carex praticola* | — | — | 2B.2 | Meadows and seeps. Moist to wet meadows. 50–10,500 feet in elevation. Blooms May–July. Perennial. | *May occur*. Moist to wet meadow habitat potentially suitable for this species is present in the project area. This species has a documented occurrence approximately 3 miles west of the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Carex praticola*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Serpentine sedge *Carex serpenticola* | — | — | 2B.3 | Meadows and seeps. Mesic, serpentine sites. Dry to moist savanna, riparian, spring margins. 60–5,610 feet in elevation. Blooms March–May. Geophyte. | *May occur*. Dry to mesic habitat with serpentine substrate potentially suitable for this species is present in the project area. *Carex serpenticola* has documented occurrences northwest of the project area in Happy Camp Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles northwest of the project area in Happy Camp Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Carex serpenticola*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Siskiyou paintbrush *Castilleja elata* | — | — | 2B.2 | Lower montane coniferous forest, bogs and fens. Serpentine endemic (i.e., 85–94 percent of occurrences are found on mesic serpentine soils); associated with bogs, seeps, and fens. 190–6,810 feet in elevation. Blooms May–August. Perennial. | *May occur*. Wetland and streamside habitat with serpentine substrates potentially suitable for this species is present in the project area. *Castilleja elata* has documented occurrences in proximity to the project area in Happy Camp and Somes Bar Areas (Calflora 2022; CNDDB 2022). This includes a documented historical occurrence approximately 5 miles west of the project area Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Castilleja elata*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Shasta chaenactis *Chaenactis suffrutescens* | — | — | 1B.3 | 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. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Chaenactis suffrutescens* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 2 miles west of the project area Salmon River Area (CCCH2 2022). Additionally, this species has two documented occurrences approximately 9 miles northeast of the project area in Seiad and Horse Creek Area located just across the Oregon border (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Chaenactis suffrutescens*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Bunchberry *Cornus canadensis* Synonum: *Cornus unalaschkensis* | — | — | 2B.2 | North coast coniferous forest, bogs and fens, meadows and seeps. 290–6,300 feet in elevation. Blooms May–July. Perennial. | *May occur*. Conifer and wetland habitat potentially suitable for this species is present in the project area. *Cornus canadensis* has documented occurrences in proximity to the project area in Happy Camp, Somes Bar, and Salmon River Areas (CNDDB 2022). This includes a documented occurrence approximately 3 miles north of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Cornus canadensis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Jepson's dodder *Cuscuta jepsonii* | — | — | 1B.2 | North coast coniferous forest. Primary host species are *Ceanothus diversifolius* and *Ceanothus prostratus*. 390–9,010 feet in elevation. Blooms July–September. Annual. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. Additionally, primary host species *Ceanothus diversifolius* is present in the project area. *Cuscuta jepsonii* has a documented occurrence approximately 10 miles west of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Cuscuta jepsonii*. However, this species is an annual herb. Impacts on this species would be avoided by implementing treatment activities during the dormant season, after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Mt. Eddy draba *Draba carnosula* | — | — | 1B.3 | Subalpine coniferous forest, upper montane coniferous forest. Rocky; serpentine. 6,350–9,850 feet in elevation. Blooms July–August. Perennial. | *May occur*. Rocky coniferous habitat serpentine substrate potentially suitable for this species is present in the project area. *Draba carnosula* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles southwest of the project area in Happy Camp Area and a documented historical occurrence 1 mile west of the project area in the Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Draba carnosula*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| English sundew *Drosera anglica* | — | — | 2B.3 | Bogs and fens, meadows and seeps (mesic). 4,260–6,560 feet in elevation. Blooms June–September. Perennial. | *May occur*. Wet meadow and other wetland habitat potentially suitable for this species is present in the project area. *Drosera anglica* has multiple documented occurrences from the same location approximately 7 miles northeast of the project area in Somes Bar Area (CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Drosera anglica*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Yellow willowherb *Epilobium luteum* | — | — | 2B.3 | Lower montane coniferous forest, meadows and seeps. Along streams, montane meadows, and in seeps. 5,180–7,220 feet in elevation. Blooms July–September. Perennial. | *May occur*. Stream and wetland habitat potentially suitable for this species are present in the project area. *Epilobium luteum* has documented occurrences in proximity to the project area in Happy Camp Area (CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles northwest of the project area in Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Epilobium luteum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Oregon fireweed *Epilobium oreganum* | — | — | 1B.2 | 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. Perennial. | *May occur*. Stream and wetland habitat with serpentine and non-serpentine substrates potentially suitable for this species are present in the project area. *Epilobium oreganum* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles northeast of the project area in Somes Bar Area and a documented historical occurrence adjacent to the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Epilobium oreganum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Siskiyou fireweed *Epilobium siskiyouense* | — | — | 1B.3 | 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. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Epilobium siskiyouense* has over twenty documented occurrences in proximity to the project area in Happy Camp, Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles north of the project area in Seiad and Horse Creek Area and a documented historical occurrence approximately 1 mile north of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Epilobium siskiyouense*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Waldo daisy *Erigeron bloomeri* var. *nudatus* | — | — | 2B.3 | Lower montane coniferous forest, upper montane coniferous forest. In open areas on dry rocky outcrops on serpentine. 2,390–5,710 feet in elevation. Blooms June–July. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Erigeron bloomeri* var. *nudatus* has documented occurrences in proximity to the project area in Happy Camp and Somes Bar Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence 1 mile northwest of the project area in Happy Camp Area 1979 (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Erigeron bloomeri* var. *nudatus*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Jaynes Canyon buckwheat *Eriogonum diclinum* | — | — | 2B.3 | Upper montane coniferous forest. Often on serpentine. 5,690–8,010 feet in elevation. Blooms June–September. Perennial. | *May occur*. Coniferous forest habitat with serpentine and non-serpentine substrates potentially suitable for this species is present in the project area. *Eriogonum diclinum* has over fifteen documented occurrences in proximity to the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented historical occurrence approximately 1 mile west of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Eriogonum diclinum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Klamath Mountain buckwheat *Eriogonum hirtellum* | — | — | 1B.3 | Chaparral, lower montane coniferous forest, upper montane coniferous forest. Dry serpentine rocky outcrops and ridges. 1,980–6,200 feet in elevation. Blooms July–September. Geophyte. | *May occur*. Conifer and chaparral habitat with serpentine substrate potentially suitable for this species is present in the project area. *Eriogonum hirtellum* has documented occurrences in proximity to Seiad and Horse Creek and Happy Camp Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 2 miles southeast of the project area in Happy Camp Area and a documented occurrence 1 mile northeast of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Eriogonum hirtellum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Warner Mountains buckwheat *Eriogonum umbellatum* var. *glaberrimum* | — | — | 1B.3 | Lower montane coniferous forest, upper montane coniferous forest, Great Basin scrub. Sandy or gravelly sites. 4,980–7,370 feet in elevation. Blooms June–September. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Eriogonum umbellatum* var. *glaberrimum* has a documented occurrence approximately 8 miles northeast of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Eriogonum umbellatum* var. *glaberrimum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Scott Valley buckwheat *Eriogonum umbellatum* var. *lautum* | — | — | 1B.1 | Cismontane woodland, lower montane coniferous forest. Sandy to gravelly flats. 2,880–3,250 feet in elevation. Blooms July–September. Perennial. | *Not expected to occur*. Project area is not within geographical range of this species. *Eriogonum umbellatum* var. *lautum* is only known from Scott Valley (CNPS 2022; NatureServe 2022). No impact is anticipated. |
| Blushing wild buckwheat *Eriogonum ursinum* var. *erubescens* | — | — | 1B.3 | Lower montane coniferous forest, montane chaparral. Gravel. 2,460–6,240 feet in elevation. Blooms June–September. Perennial. | *May occur*. Coniferous forest and montane chaparral habitat potentially suitable for this species is present in the project area. *Eriogonum ursinum* var. *erubescens* has documented occurrences in proximity to the project area in Seiad and Horse Creek and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 9 miles southeast of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Eriogonum ursinum* var. *erubescens*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Henderson's fawn lily *Erythronium hendersonii* | — | — | 2B.3 | Lower montane coniferous forest. Dry woodland, openings. 200–2,950 feet in elevation. Blooms April–July. Geophyte. | *May occur*. Conifer and woodland habitat potentially suitable for this species is present in the project area. *Erythronium hendersonii* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes documented occurrences less than one mile northwest and directly adjacent to the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Erythronium hendersonii*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Howell's fawn lily *Erythronium howellii* | — | — | 1B.3 | Lower montane coniferous forest, north coast coniferous forest. Dry woodland, shrubby slopes. Sometimes on serpentine. 390–3,770 feet in elevation. Blooms April–May. Geophyte. | *May occur*. Conifer and woodland habitat with serpentine and non-serpentine substrates potentially suitable for this species are present in the project area. *Erythronium citrinum* var. *citrinum* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, Somes Bar, and Orleans Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes documented occurrences directly adjacent to the project area in Orleans Area and less than 1 mile west of the project area in Somes Bar Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Erythronium citrinum* var. *citrinum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Giant fawn lily *Erythronium oregonum* | — | — | 2B.2 | Cismontane woodland, meadows and seeps. Openings. Sometimes on serpentine; rocky sites. 950–4,710 feet in elevation. Blooms March–June. Perennial. | *May occur*. Woodland and meadow habitat with serpentine and non-serpentine substrates potentially suitable for this species is present in the project area. *Erythronium oregonum* has documented occurrences in proximity to the project area in Somes Bar and Salmon River Areas (CCH2 2022; CNDDB 2022). *Erythronium oregonum* has documented occurrences in Oregon (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Erythronium oregonum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Coast fawn lily *Erythronium revolutum* | — | — | 2B.2 | Bogs and fens, broadleafed upland forest, north coast coniferous forest. Mesic sites; streambanks. 200–4,610 feet in elevation. Blooms March–July. Geophyte. | *May occur*. Streambank and wetland habitat potentially suitable for this species is present in the project area. This species has a documented occurrence approximately 1 mile southwest of the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Erythronium revolutum*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Brook pocket moss *Fissidens aphelotaxifolius* | — | — | 2B.2 | Lower montane coniferous forest, upper montane coniferous forest. Moss growing on rocks in stream channels and waterfalls; also in splash zones. 6,560–7,220 feet in elevation. Perennial. | *May occur*. Streambank and other mesic habitat potentially suitable for this species is present in the project area. *Fissidens aphelotaxifolius* has a documented occurrence approximately 2 miles west of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Fissidens aphelotaxifolius*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Modoc green-gentian *Frasera albicaulis* var. *modocensis* | — | — | 2B.3 | Great Basin scrub, upper montane coniferous forest. Openings. 2,950–5,740 feet in elevation. Blooms May–July. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Frasera albicaulis* var. *modocensis* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022). Additionally, this species has a documented historical occurrence approximately 14 miles northeast of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Frasera albicaulis* var. *modocensis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Gentner's fritillary *Fritillaria gentneri* | FE | — | 1B.1 | Cismontane woodland, chaparral, lower montane coniferous forest. Open sites at edge of woodland or chaparral; sometimes on serpentine. 3,300–3,680 feet in elevation. Blooms April–May. Geophyte. | *Not expected to occur*. Project area is not within geographical range of this species. *Fritillaria gentneri* is only known from two occurrences in California in the Camp Creek–Scotch Creek Watershed east of the project area and I-5 (CNPS 2022; CNDDB 2022). No impact is anticipated. |
| Scott Mountain bedstraw *Galium serpenticum* ssp. *scotticum* | — | — | 1B.2 | Lower montane coniferous forest. Generally, on north-facing slopes on serpentine in mixed conifer forest. 3,280–6,810 feet in elevation. Blooms May–August. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Galium serpenticum* ssp. *scotticum* has documented occurrences in proximity of the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles northeast of the project area and a documented historical occurrence approximately 2 miles southeast of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Galium serpenticum* ssp. *scotticum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Klamath gentian *Gentiana plurisetosa* | — | — | 1B.3 | Meadows and seeps, upper montane coniferous forest, lower montane coniferous forest. Mesic sites. 3,930–6,240 feet in elevation. Blooms July–September. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Gentiana plurisetosa* has documented occurrences in proximity of the project area in Orleans and Somes Bar Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence directly adjacent to the east of the project area in Somes Bare Area (CNDDB 2022). *Gentiana plurisetosa* also has documented occurrences in Oregon (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Gentiana plurisetosa*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Pacific gilia *Gilia capitata* ssp. *pacifica* | — | — | 1B.2 | 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. Annual. | *May occur*. Grassland and openings chaparral habitat potentially suitable for this species is present in the project area. *Gilia capitata* ssp. *pacifica* has a documented occurrence directly adjacent to the north of the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Gilia capitata* ssp. *pacifica*. However, this species is an annual herb. Impacts on this species would be avoided by implementing treatment activities during the dormant season, after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Buttercup-leaf suksdorfia *Hemieva ranunculifolia* | — | — | 2B.2 | Upper montane coniferous forest, meadows and seeps. Mesic sites; rocky. 4,920–8,200 feet in elevation. Blooms June–August. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Hemieva ranunculifolia* has documented occurrences in proximity of the project area in the Seiad and Horse Creek, Happy Camp, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented historical occurrence mapped in proximity of Josephine Lake Basin directly adjacent to the project area in Salmon River Area (CNDDB 2022). *Hemieva ranunculifolia* also has documented occurrences in Oregon (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Gentiana plurisetosa*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Henderson's horkelia *Horkelia hendersonii* | — | — | 1B.1 | Upper montane coniferous forest. Granitic peaks and talus slopes at high elevations. 6,560–7,550 feet in elevation. Blooms June–August. Perennial. | *Not expected to occur*. Project area does not contain coniferous forest habitat with granitic substrate potentially suitable for this species within geographical range of this species. *Horkelia hendersonii* is only known from one occurrence in California approximately 4 miles east of the project area in Seiad and Horse Creek Area (CNPS 2022; NatureServe 2022). Although, the nearest coniferous forest habitat with granitic substrate potentially suitable for this species in the project area is in southern Somes Bar Area. The remaining documented occurrences of this species are in Oregon where it has been classified as endangered (CNPS 2022; NatureServe 2022). No impact is anticipated. |
| California globe mallow *Iliamna latibracteata* | — | — | 1B.2 | North Coast coniferous forest (mesic), chaparral, lower montane coniferous forest, riparian scrub (streambanks). 200–6,560 feet in elevation. Blooms June–August. Perennial. | *May occur*. Conifer, chaparral, and riparian habitat potentially suitable for this species is present in the project area. Treatments could result in direct or indirect adverse effects on *Iliamna latibracteata*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Pickering's ivesia *Ivesia pickeringii* | — | — | 1B.2 | Lower montane coniferous forest, meadows and seeps. Wet, rocky meadows, generally on serpentine clay. 2,790–5,000 feet in elevation. Blooms June–August. Perennial. | *May occur*. Mesic meadow habitat potentially suitable for this species is present in the project area. *Ivesia pickeringii* has documented occurrence in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles northeast of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Ivesia pickeringii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Dudley's rush *Juncus dudleyi* | — | — | 2B.3 | Lower montane coniferous forest. Wet areas in conifer forest. 1,490–6,560 feet in elevation. Blooms July–August. Perennial. | *May occur*. Mesic conifer habitat potentially suitable for this species is present in the project area. *Juncus dudleyi* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented historical occurrence mapped at the confluence of Walker Creek and the Klamath River directly adjacent to the project area in Seiad and Horse Creek Area (CNDDB 2022). This occurrence was potentially observed in the project area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Juncus dudleyi*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Regel's rush *Juncus regelii* | — | — | 2B.3 | Upper montane coniferous forest, meadows and seeps. Mesic sites. 2,490–6,235 feet in elevation. Blooms August. Geophyte. | *May occur*. Mesic conifer and meadow habitat potentially suitable for this species is present in the project area. *Juncus regelii* has documented occurrences in proximity to the project area in Happy Camp and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 6 miles southwest of the project area in Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Juncus regelii*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Small groundcone *Kopsiopsis hookeri* | — | — | 2B.3 | North coast coniferous forest. Open woods, shrubby places, generally on *Gaultheria shallon*. 390–4,710 feet in elevation. Blooms April–August. Geophyte. | *May occur*. Conifer habitat potentially suitable for this species is present in the project area. Additionally, the project area is located within part of the host plant *Gaultheria shallon*'s range (CCH2 2022). *Kopsiopsis hookeri* has a documented historical occurrence approximately 2 miles west of the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Kopsiopsis hookeri*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Heckner's lewisia *Lewisia cotyledon* var. *heckneri* | — | — | 1B.2 | Lower montane coniferous forest. Rocky places. 740–6,890 feet in elevation. Blooms May–July. Perennial. | *May occur*. Rocky coniferous forest habitat potentially suitable for this species is present in the project area. *Lewisia cotyledon* var. *heckneri* has documented occurrences in proximity to project area in Seiad and Horse Creek, Happy Camp, Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Lewisia cotyledon* var. *heckneri*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Henderson's lomatium *Lomatium hendersonii* | — | — | 2B.3 | Pinyon-juniper woodland, Great Basin scrub, lower montane coniferous forest. Gravelly or rocky soil. 4,590–8,010 feet in elevation. Blooms March–June. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Lomatium hendersonii* has a documented occurrence approximately 2 miles north of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Lomatium hendersonii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Coast Range lomatium *Lomatium martindalei* | — | — | 2B.3 | Conifer forest, rocks, meadows, talus, pumice, coastal bluffs. 790–9,840 feet in elevation. Blooms May–June. Perennial. | *May occur*. Coniferous forest and meadow habitat potentially suitable for this species is present in the project area. *Lomatium martindalei* has four documented occurrences approximately 2 miles west of the project area in Somes Bar Area (CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Lomatium martindalei*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Long seta hump moss *Meesia longiseta* | — | — | 2B.3 | Bogs and fens, meadows and seeps, upper montane coniferous forest. On moist soil along streams and in meadows; often carbonate. 5,740–9,990 feet in elevation. Perennial. | *May occur*. Stream and meadow habitat potentially suitable for this species is present in the project area. *Meesia longiseta* has a documented occurrence approximately 8 miles northeast of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Meesia longiseta*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Oregon bluebells *Mertensia bella* | — | — | 2B.2 | Meadows and seeps, upper montane coniferous forest. Mesic. Wet meadows, springs, under taller herbs, often in disturbed areas and/or openings. 4,660–6,560 feet in elevation. Blooms May–July. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Mertensia bella* has documented occurrences in proximity to the project area in Seiad and Horse Creek and Happy Camp Areas (CCH2 2022; CNNDB 2022). This includes a documented occurrence approximately 7 miles north of the project area and a documented historical occurrence 6 miles east of the project area in Happy Camp Area (CNDDB 2022). All but two of the documented occurrences in proximity to the Seiad and Horse Creek and Happy Camp Areas are across the Oregon border (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Mertensia bella*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Mielichhofer's copper moss *Mielichhoferia mielichhoferiana* | — | — | 2B.3 | Coniferous forest and woodland. Known from subalpine coniferous forest in California. Rock crevices, soil banks, roadsides. 1,230–6,400 feet in elevation. Perennial. | *May occur*. Rock crevice, soil bank, and roadside habitat potentially suitable for this species is present in the project area. *Mielichhoferia mielichhoferiana* has documented occurrences in proximity of the project area in Somes Bar and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles north of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Mielichhoferia mielichhoferiana*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Ghost-pipe *Monotropa uniflora* | — | — | 2B.2 | Broadleafed upland forest, north coast coniferous forest. Low mixed or conifer forest. 50–2,810 feet in elevation. Blooms June–August. Perennial. | *May occur*. Broadleafed upland and coniferous forest habitat potentially suitable for this species is present in the project area. *Monotropa uniflora* has a documented historical occurrence approximately 12 miles west of the project area in Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Monotropa uniflora*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Howell's montia *Montia howellii* | — | — | 2B.2 | Meadows and seeps, north coast coniferous forest, vernal pools. Meadows, North Coast coniferous forest, vernal pools, vernally mesic soils, moist lowland areas. Sometimes on roadsides. 30–3,300 feet in elevation. Blooms March–May. Annual. | *May occur*. Mesic habitat with serpentine substrate potentially suitable for this species is present in the project area. *Montia howellii* has documented occurrences in proximity to the project area in Orleans Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles southwest of the project area in Orleans Area (CNDDB 2022). Additionally, there is a documented occurrence in Oregon north of the Happy Camp Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Montia howellii*. However, this species is an annual herb. Impacts on this species would be avoided by implementing treatment activities during the dormant season, after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Wolf's evening-primrose *Oenothera wolfii* | — | — | 1B.1 | 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. Perennial. | *May occur*. Sandy habitat potentially suitable for this species is present in the project area. *Oenothera wolfii* has documented occurrences in proximity to the project area in Seiad and Horse Creek Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence directly adjacent to the project area in Seiad and Horse Creek and a documented historical occurrence directly adjacent to the project area in Orleans Areas (CCH2 2022; CNDDB 2022). The documented occurrence in Seiad and Horse Creek Area was potentially observed in the project area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Oenothera wolfii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Cascade grass-of-Parnassus *Parnassia cirrata* var. *intermedia* | — | — | 2B.2 | Meadows and seeps, bogs, and fens. Wet places. Rocky, sometimes serpentine soil. 2,540–6,560 feet in elevation. Blooms August–September. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Parnassia cirrata* var. *intermedia* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented historical occurrence approximately 1 mile west of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Parnassia cirrata* var. *intermedia*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Tracy's beardtongue *Penstemon tracyi* | — | — | 1B.3 | Upper montane coniferous forest. Dry rocky ridges, ledges, and cliffs, often in crevices. 6,490–7,200 feet in elevation. Blooms June–August. Perennial. | *May occur*. Rocky coniferous forest habitat potentially suitable for this species is present in the project area. *Penstemon tracyi* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence 1 mile southeast of the project area in Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Penstemon tracyi*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Scott Valley phacelia *Phacelia greenei* | — | — | 1B.2 | Serpentine soils, openings in conifer forest. 2,790–7,810 feet in elevation. Blooms April–June. Annual. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Phacelia greenei* has a documented occurrence approximately 3 miles east of the project area in Salmon River Area CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Phacelia greenei*. However, this species is an annual herb. Impacts on this species would be avoided by implementing treatment activities during the dormant season, after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Siskiyou phacelia *Phacelia leonis* | — | — | 1B.3 | Upper montane coniferous forest, meadows and seeps. Sandy flats, slopes, sometimes on serpentine. 3,930–6,560 feet in elevation. Blooms June–August. Annual. | *May occur*. Coniferous forest and meadow habitat potentially suitable for this species is present in the project area. *Phacelia leonis* has documented occurrences, most historical, in proximity to the project area in Seiad and Horse Creek, Happy Camp, Somes Bar, and Salmon Creek Areas (CCH2 2022; CNDDB 2022) This includes a documented occurrence approximately 10 miles southeast of the project area in Salmon River Area and a documented historical occurrence less than one mile west of the project area in Happy Camp Area (CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Phacelia leonis*. However, this species is an annual herb. Impacts on this species would be avoided by implementing treatment activities during the dormant season, after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Yreka phlox *Phlox hirsuta* | FE | SE | 1B.2 | Lower montane coniferous forest, upper montane coniferous forest. Open slopes and grasslands, on serpentine gravel. 2,690–4,200 feet in elevation. Blooms April–June. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Phlox hirsuta* has a documented occurrence approximately 18 miles southeast of the project area in Seiad and Horse Creek Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Phlox hirsuta*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Engelmann spruce *Picea engelmannii* | — | — | 2B.2 | Upper montane coniferous forest. Slopes and hillsides, often on alluvial terrace. 3,490–7,010 feet in elevation. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Picea engelmannii* has over 20 documented occurrences in proximity to the project area in Somes Bar and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 2 miles north of the project area in Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Picea engelmannii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Horned butterwort *Pinguicula macroceras* | — | — | 2B.2 | Meadow edges, seepage areas. Serpentine soil. 60–6,010 feet in elevation. Blooms April–June. Perennial. | *May occur*. Wetland habitat with serpentine substrate potentially suitable for this species is present in the project area. *Pinguicula macroceras* has documented occurrences in proximity to the project area in Happy Camp and Somes Bar Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles west of the project area in Somes Bar Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Pinguicula macroceras*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Whitebark pine *Pinus albicaulis* | FT | — | — | Upper red-fir forest to timberline, especially subalpine forest. Subalpine, arid, exposed areas; only at the upper reaches of the highest peaks throughout the western mountains. 6,000–12,200 feet in elevation. Blooms July–August. Perennial. | *May occur*. Subalpine coniferous forest habitat potentially suitable for this species is present in the project area. *Pinus albicaulis* has over 15 documented occurrences in proximity to the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022). This includes a documented occurrence approximately 1 mile west of the project area in the Salmon River Area and documented historical occurrence directly adjacent to the project area in the Somes Bar Area (Calflora 2022; CCH2 2022). Treatments could result in direct or indirect adverse effects on *Pinus albicaulis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| White-flowered rein orchid *Piperia candida* | — | — | 1B.2 | 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. Perennial. | *May occur*. Coniferous and broadleafed upland forest habitat potentially suitable for this species is present in the project area. *Piperia candida* has documented occurrences in proximity to the project area in Seiad and Horse Creek, Happy Camp, Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes documented occurrences less than 1 mile west and north of the project area in Seiad and Horse Creek and Salmon River Areas (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Piperia candida*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Tundra thread moss *Pohlia tundrae* | — | — | 2B.3 | Alpine boulder and rock field. Moss growing on gravelly, damp soil. 7,220–9,840 feet in elevation. Perennial. | *May occur*. Gravelly damp soil habitat potentially suitable for this species is present in the project area. *Pohlia tundrae* a has documented occurrence approximately 1 mile north of the project area in Salmon River Area from 2021 (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Pohlia tundrae*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Oregon polemonium *Polemonium carneum* | — | — | 2B.2 | Coastal prairie, coastal scrub, lower montane coniferous forest. Moist to dry, open areas. 0–6,010 feet in elevation. Blooms April–September. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Polemonium carneum* has documented occurrences in proximity of the project area in Seiad and Horse Creek, Happy Camp, and Somes Bar Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 9 miles northeast of the project area in the Somes Bar Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Polemonium carneum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Mt. Shasta sky pilot *Polemonium pulcherrimum* var. *shastense* | — | — | 1B.2 | Alpine boulder and rock fields, subalpine coniferous forest, upper montane coniferous forest. Sometimes volcanic. 7,130–12,800 feet in elevation. Blooms June–September. Perennial. | *May occur*. Coniferous forest habitat with volcanic and non-volcanic substrates potentially suitable for this species is present in the project area. *Polemonium pulcherrimum* var. *shastense* has a documented occurrence 8 miles east of the project area in the Salmon River Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Polemonium pulcherrimum var. shastense*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Robbins' pondweed *Potamogeton robbinsii* | — | — | 2B.3 | Deep water, lakes. *Potamogeton robbinsii* has been recorded along creeks. 5,020–10,830 feet in elevation. Blooms July–August. Geophyte. | *May occur*. Deep water, lake, and creek habitat potentially suitable for this species is present in the project area. *Potamogeton robbinsii* has documented occurrences in the Some Bar Area (CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3 miles northeast of the project area in Somes Bar Area (CCH2 2022). Treatments could result in direct and indirect adverse effects on *Potamogeton robbinsii*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Crested potentilla *Potentilla cristae* | — | — | 1B.3 | Seasonally wet gravels, talus, swales, and seeps; gravelly or rocky sites; often on serpentine. 5,900–9,190 feet in elevation. Blooms August–September. Perennial. | *May occur*. Mesic gravelly habitat potentially suitable for this species is present in the project area. *Potentilla cristae* has documented occurrences in proximity to the project area in the Somes Bar and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3 miles north of the project area in the Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Potentilla cristae*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Siskiyou bells *Prosartes parvifolia* | — | — | 1B.2 | Lower montane coniferous forest, upper montane coniferous forest. Occurs in disturbed and undisturbed sites, but most productive when growing at roadsides, disturbed areas, burned areas. 2,100–4,840 feet in elevation. Blooms May–September. Geophyte. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Prosartes parvifolia* has a documented historical occurrence approximately 4 miles northwest of the project area in Happy Camp Area (CCCH2 2022). Additionally, this species has a documented occurrence approximately 12 miles southwest of the project area in Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Prosartes parvifolia*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Showy raillardella *Raillardella pringlei* | — | — | 1B.2 | Bogs and fens, meadows and seeps, upper montane coniferous forest. Wet meadows, streambanks, seeps, on serpentine-derived soils, in conifer forest. 3,940–7,510 feet in elevation. Blooms July–September. Geophyte. | *May occur*. Wetland and streambank habitat with serpentine substrate potentially suitable for this species is present in the project area. *Raillardella pringlei* has several documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence 3 miles east of the project area in Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Raillardella pringlei*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| White beaked-rush *Rhynchospora alba* | — | — | 2B.2 | Bogs and fens, meadows and seeps, marshes and swamps. Freshwater marshes and sphagnum bogs. 200–6,690 feet in elevation. Blooms June–August. Geophyte. | *May occur*. Wetland habitat potentially suitable for this species is present in the project area. *Rhynchospora alba* has several documented occurrences, in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence 8 miles southeast of the project area in Salmon River Area (CNDDB 2022). Additionally, *Rhynchospora alba* has documented occurrences in Oregon (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Rhynchospora alba*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Columbia yellow cress *Rorippa columbiae* | — | — | 1B.2 | Meadows and seeps, playas, vernal pools, lower montane coniferous forest. Streambanks, lake or pond margins, meadows, wet fields. 3,280–5,910 feet in elevation. Blooms May–September. Geophyte. | *May occur*. Mesic and streambank habitat potentially suitable for this species is present in the project area. *Rorippa columbiae* has a documented historical occurrence directly adjacent to the project area in Orleans Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Rorippa columbiae*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Gasquet rose *Rosa gymnocarpa* var. *serpentina* | — | — | 1B.3 | Chaparral, cismontane woodland. Serpentinite. Often on roadsides, sometime on ridges, streambanks, and in openings. 1,190–7,320 feet in elevation. Blooms April–June. Geophyte. | *May occur*. Chaparral and woodland habitat with serpentine substrate potentially suitable for this species is present in the project area. *Rosa gymnocarpa* var. *serpentina* has documented occurrences in proximity of the project area in Happy Camp and Seiad and Horse Creek Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3 miles northwest of the project area in Seiad and Horse Creek Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Rosa gymnocarpa* var. *serpentina*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Snow dwarf bramble *Rubus nivalis* | — | — | 2B.3 | North Coast coniferous forest. Moist semi-shaded to open areas. 3,540–4,410 feet in elevation. Blooms June–August. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Rubus nivalis* has documented occurrences in proximity to the project area in the Happy Camp and Somes Bar Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles north of the project area in the Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Rubus nivalis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Scott Mountain sandwort *Sabulina stolonifera* | — | — | 1B.3 | Lower montane coniferous forest. Serpentine soils. 4,100–4,590 feet in elevation. Blooms May–August. Perennial. | *May occur*. Coniferous forest habitat with serpentine substrate potentially suitable for this species is present in the project area. *Sabulina stolonifera* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Sabulina stolonifera*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| American saw-wort *Saussurea americana* | — | — | 2B.2 | Lower montane coniferous forest, meadows and seeps. Steep rocky hillsides, moist meadows. Mesic sites. 5,570–6,400 feet in elevation. Blooms July–August. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Saussurea americana* has documented occurrences in proximity to the project area in Seiad and Horse Creek Area near the Pacific Crest Trail (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 3.4 miles north of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Saussurea americana*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Tufted saxifrage *Saxifraga cespitosa* | — | — | 2B.3 | Meadows and seeps. Damp, rocky places. 3,000–6,500 feet in elevation. Blooms June–September. Perennial. | *May occur*. Rocky mesic habitat potentially suitable for this species is present in the project area. *Saxifraga cespitosa* has documented occurrences in proximity to the project area in Somes Bar and Seiad Horse Creek Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes two documented occurrences approximately 3 miles north of the project area in Somes Bar Area (Calflora 2022; CNDDB 2022). *Saxifraga cespitosa* has documented occurrences in other western states including Oregon and Utah (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Saxifraga cespitosa*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Water bulrush *Schoenoplectus subterminalis* | — | — | 2B.3 | Montane lake margins, in shallow water. Streams low in nutrients. 2,460–7,380 feet in elevation. Blooms June–August. Geophyte. | *May occur*. Lake and stream habitat potentially suitable for this species is present in the project area. *Schoenoplectus subterminalis* has documented occurrences in proximity to the project area in Happy Camp, Orleans, and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes documented occurrences approximately 8 miles east of the project area in Salmon River Area and 2 miles west of the project area in Orleans Area (CCH2 2022). Treatments could result in direct or indirect adverse effects on *Schoenoplectus subterminalis*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Cascade stonecrop *Sedum divergens* | — | — | 2B.3 | Rocky alpine slopes and cool cliffs. 5,000–7,660 feet in elevation. Blooms July–September. Perennial. | *May occur*. Rocky habitat potentially suitable for this species is present in the project area. *Sedum divergens* has documented occurrences in proximity to the project area in the Seiad and Horse Creek, Happy Camp, and Orleans Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 5 miles west of the project area in the Happy Camp Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Sedum divergens*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Marble Mountains stonecrop *Sedum marmorense* | — | — | 1B.2 | Upper montane coniferous forest, subalpine coniferous forest. Openings, rocky, talus, rock crevices. Sometimes ultramafic. 6,150–7,695 feet in elevation. Blooms June–August. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Sedum marmorense* has documented occurrences in proximity to the project area in Seiad and Horse Creek and Somes Bar Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 2 northwest of the project area in Somes Bar Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Sedum marmorense*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Applegate stonecrop *Sedum oblanceolatum* | — | — | 1B.1 | Upper montane coniferous forest. Rocky sites. 1,310–6,560 feet in elevation. Blooms June–July. Perennial. | *May occur*. Rocky coniferous forest habitat potentially suitable for this species is present in the project area. *Sedum oblanceolatum* has documented occurrences in proximity to the project area in Seiad and Horse Creek Area (CCH22022; CNDDB 2022). This includes a documented occurrence approximately 2 northwest of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Sedum oblanceolatum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Canyon Creek stonecrop *Sedum paradisum* ssp. *paradisum* | — | — | 1B.3 | Chaparral, lower montane coniferous forest, subalpine coniferous forest, broadleafed upland forest. Rock faces, in crevices of exposed granite. 650–6,890 feet in elevation. Blooms May–June. Perennial. | *May occur*. Rocky granitic habitat potentially suitable for this species is present in the project area. *Sedum paradisum* ssp. *paradisum* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022) This includes a documented occurrence approximately 1 mile south of the project area in Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Sedum paradisum* ssp. *paradisum*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Coast checkerbloom *Sidalcea oregana* ssp. *eximia* | — | — | 1B.2 | 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. Perennial. | *May occur*. Coniferous forest and meadow habitat potentially suitable for this species is present in the project area. *Sidalcea oregana* ssp. *eximia* has documented occurrences in proximity to the project area in Salmon River Area (Calflora 2022; CCH2 2022; CNDDB 2022) This includes a documented occurrence approximately 1 mile south of the project area in Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Sidalcea oregana* ssp. *eximia*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Hooker's catchfly *Silene hookeri* | — | — | 2B.2 | Cismontane woodland, lower montane coniferous forest, chaparral. Grassy openings (often), rocky slopes (sometimes), serpentinite (sometimes). 490–4,140 feet in elevation. Blooms April–June. Perennial. | ***Known to occur***. *Silene hookeri* has a documented population in the project area in Orleans Area along Ishi-Pishi Road south of the confluence of the Klamath and Salmon Rivers from two collections (CNDDB 2022). Woodland, coniferous forest, and chaparral habitat with serpentine and non-serpentine substrates potentially suitable for this species is present in the project area. *Silene hookeri* has documented occurrences in proximity of the project area in Seiad and Horse Creek Happy Camp, Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Silene hookeri*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Marble Mountain campion<br>*Silene marmorensis* | — | — | 1B.2 | Broadleafed upland forest, lower montane coniferous forest, cismontane woodland, chaparral. Openings with little vegetation, shady areas, often along trails; can be on serpentine. 560–4,165 feet in elevation. Blooms June–August. Perennial. | ***Known to occur***. This species has documented occurrences in the project area mostly along the Salmon River and the North and South Forks of the Salmon River, as well as in the mountains between the Forks of the Salmon River (CNDDB 2022). Broadleafed upland forest, woodland, coniferous forest, and chaparral habitat with serpentine and non-serpentine substrates potentially suitable for this species is present in the project area. *Silene marmorensis* has documented occurrences in proximity to the project area in Somes Bar, Orleans, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Silene marmorensis*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Klamath Mountain catchfly<br>*Silene salmonacea* | — | — | 1B.2 | Lower montane coniferous forest. Openings, sometimes on serpentine. 2,540–4,410 feet in elevation. Blooms May–July. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Silene salmonacea* has documented occurrences in proximity to the project area in the Salmon River Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 9 miles southeast of the project area in the Salmon River Area (Calflora 2022). Treatments could result in direct or indirect adverse effects on *Silene salmonacea*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Hairy marsh hedge-nettle<br>*Stachys pilosa* | — | — | 2B.3 | Great Basin scrub, meadows and seeps. Mesic sites. 2,575–6,710 feet in elevation. Blooms June–August. Geophyte. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. *Stachys pilosa* has a documented occurrences in the Seiad and Horse Creek Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 3 miles northwest of the project area in Seiad and Horse Creek Area (CNNDB 2022). Treatments could result in direct or indirect adverse effects on *Stachys pilosa*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities and only during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Howell's tauschia *Tauschia howellii* | — | — | 1B.3 | Subalpine coniferous forest, upper montane coniferous forest. Gravelly, granitic, ridges and slopes. 5,640–8,005 feet in elevation. Blooms June–August. Perennial. | *May occur*. Coniferous habitat potentially suitable for this species is present in the project area. *Tauschia howellii* has documented occurrences in proximity of the project area in Somes Bar and Salmon River Areas (Calflora 2022; CNDDB 2022). This includes a documented occurrence less than one mile east of the project area in the Somes Bar Area (CNDDB 2022). Additionally, *Tauschia howellii* has documented occurrences in Oregon (Calflora 2022; CCH2 2022). Treatments could result in direct or indirect adverse effects on *Tauschia howellii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Robust false lupine *Thermopsis robusta* | — | — | 1B.2 | North Coast coniferous forest, broadleafed upland forest. Ridgetops; sometimes on serpentine. 1,200–4,610 feet in elevation. Blooms May–July. Geophyte. | *May occur*. Coniferous and broadleafed upland forest habitat potentially suitable for this species is present in the project area. *Thermopsis robusta* has documented occurrences in proximity to the project area in Happy Camp, Somes Bar, Orleans Areas (Calflora 2022; CNDDB 2022). This includes multiple documented occurrences directly adjacent to the project area in Happy Camp, Somes Bar, and Orleans Areas (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Thermopsis robusta*. However, this species is a geophyte. Impacts on this species would be avoided by implementing only non-ground-disturbing treatment activities during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| Lyall's tonestus *Tonestus lyallii* | — | — | 2B.3 | Alpine talus, barrens. 4,920–9,190 feet in elevation. Blooms July–August. Geophyte. | *May occur*. Woodland habitat potentially suitable for this species is present in the project area. *Tonestus lyallii* has documented occurrences in proximity to the project area in Salmon River Area (CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 4 miles southwest of the project area in Salmon River Area (CNNDB 2022). Treatments could result in direct or indirect adverse effects on *Tonestus lyallii*. However, this species is a geophyte. Impacts on this species would be avoided by implementing non-ground-disturbing treatment activities during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Siskiyou clover *Trifolium siskiyouense* | — | — | 1B.1 | Meadows and seeps. Mesic sites, wet mountain meadows, sometimes on streambanks. 2,890–4,920 feet in elevation. Blooms June–July. Perennial. | *May occur*. Mesic habitat potentially suitable for this species is present in the project area. Treatments could result in direct or indirect adverse effects on *Trifolium siskiyouense*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Henderson's triteleia *Triteleia hendersonii* | — | — | 2B.2 | Cismontane woodland. Open slopes and road banks. 2,490–3,940 feet in elevation. Blooms May–July. Geophyte. | *May occur*. Woodland habitat potentially suitable for this species is present in the project area. *Triteleia hendersonii* has documented occurrences in proximity of the project area in Seiad and Horse Creek and Happy Camp Areas (Calflora 2022; CCH2 2022; CNDDB 2022). This includes a documented occurrence approximately 6 miles northeast of the project area in Seiad and Horse Creek Area (CNNDB 2022). Treatments could result in direct or indirect adverse effects on *Triteleia hendersonii*. However, this species is a geophyte. Impacts on this species would be avoided by implementing non-ground-disturbing treatment activities during the dormant season (i.e., when the plant has no aboveground parts), generally in the winter. Ground-disturbing treatment activities may result in impacts to this species even when dormant. If treatment activities cannot be completed in the dormant season and would be implemented during the growing season, or if ground-disturbing treatment activities are proposed in potential habitat for this species, pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Little-leaved huckleberry *Vaccinium scoparium* | — | — | 2B.2 | Rocky, subalpine woods. Sometimes serpentine. 3,400–7,220 feet in elevation. Blooms June–August. Perennial. | ***Known to occur***. *Vaccinium scoparium* has a documented historical occurrence in the project area in Salmon River Area at Jackson Lake (CNDDB 2022). Rocky subalpine woodland habitat potentially suitable for this species is present in the project area. *Vaccinium scoparium* has over fifteen documented occurrences in proximity of the project area in Seiad and Horse Creek, Somes Bar, and Salmon River Areas (Calflora 2022; CCH2 2022; CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Vaccinium* scoparium. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |
| Howell's violet *Viola howellii* | — | — | 2B.2 | Moist, shady areas, conifer forest. 160–4,250 feet in elevation. Blooms May–June. Perennial. | *May occur*. Coniferous forest habitat potentially suitable for this species is present in the project area. *Viola howellii* has documented occurrences in proximity of the project area in Happy Camp Area (Calflora 2022; CNDDB 2022). This includes a documented occurrence approximately 6 miles north of the project area in Seiad and Horse Creek Area (CNDDB 2022). Treatments could result in direct or indirect adverse effects on *Viola howellii*. Pre-treatment surveys will be conducted per SPR BIO-7. This species will be flagged and avoided by treatment activities if found. |

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| **Reptiles and Amphibians** | | | | | |
| Cascades frog *Rana cascadae* | — | SC SSC | — | Montane aquatic habitats such as mountain lakes, small streams, and ponds in meadows; open coniferous forests. Standing water required for reproduction. Hibernates in mud on the bottom of lakes and ponds during the winter. Cascades frog is associated closely with water and is rarely found more than a few meters (i.e., 3 to 20 feet) from aquatic habitat. | *May occur*. The Cascades frog range includes the southern half of the Somes Bar area, the Orleans area, and the Salmon River area of the project area. Many documented occurrences of Cascades frog are located within this portion of its range, including areas near Granite Creek, Burney Valley Creek, Shackleford Creek, Red Rock Creek, Granite Creek, Wooley Creek, North Fork Salmon River, and other smaller tributaries and lakes (CNDDB 2022). Lakes, streams, and ponds in the project area may provide habitat suitable for this species.<br>This analysis assumes that treatment activities conducted greater than approximately 20 feet from aquatic habitat suitable for Cascades frog (i.e., lakes, streams, ponds, wet meadows with standing water) would avoid impacts on individual frogs. Treatment activities conducted within 20 feet of aquatic habitat suitable for Cascades frog could result in injury or mortality of individual frogs, if present. If avoidance of areas within 20 feet of aquatic habitat suitable for this species is not feasible, then focused visual encounter surveys for Cascades frogs would be implemented (pursuant to SPR BIO-10), and if individuals are detected, occupied habitat areas would be flagged within which no treatment activities would occur, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of Cascades frogs would be implemented (pursuant to Mitigation Measure BIO-2a).<br>If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA for Cascades frog. |

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| Foothill yellow-legged frog<br>*Rana boylii* | — | SSC | — | Partly-shaded, shallow streams and 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. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away, from aquatic habitat (CDFW 2018b). | *May occur*. There are many documented occurrences of foothill yellow-legged frog in the vicinity of the project area, primarily associated with the Klamath River, North Fork Salmon River, and South Fork Salmon River (CNDDB 2022).<br>This analysis assumes that treatment activities conducted greater than approximately 200 feet from aquatic habitat suitable for foothill yellow-legged frog (i.e., perennial [Class I and Class II] streams) would avoid impacts on individual frogs. Treatment activities conducted within 200 feet of aquatic habitat suitable for foothill yellow-legged frog could result in injury or mortality of individual frogs, if present. If avoidance of areas within 200 feet of aquatic habitat suitable for this species is not feasible, then focused visual encounter surveys for foothill yellow-legged frogs would be implemented (pursuant to SPR BIO-10), and if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of foothill yellow-legged frogs would be implemented (pursuant to Mitigation Measure BIO-2b). |
| Northern red-legged frog<br>*Rana aurora* | — | SSC | — | Humid forests, woodlands, grasslands, and streamsides 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. | *Not expected to occur*. The project area is outside of the documented range of northern red-legged frog. Project implementation would not result in impacts on this species. |

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| Pacific tailed frog *Ascaphus truei* | — | SSC | — | Occurs in montane hardwood-conifer, redwood, Douglas fir and ponderosa pine habitats. Restricted to perennial montane streams. Tadpoles require water below 15 degrees C. Pacific tailed frog is associated closely with water and is rarely found more than a few meters (i.e., 3 to 20 feet) from aquatic habitat. | *May occur*. The range of Pacific tailed frog includes the entire project area. There are many documented occurrences of this species including areas near North Little Fork Salmon River, Plummer Creek, Reynolds Creek, Natuket Creek, Dobbins Creek, King Creek, Independence Creek, Seiad Creek, Oak Flat Creek, Walked Creek, Grider Creek, and East Walker Creek (CNDDB 2022). Streams in the project area may provide habitat suitable for this species.<br>Treatment activities conducted greater than approximately 20 feet from aquatic habitat suitable for Pacific tailed frog (i.e., perennial [Class I and Class II] streams) would avoid impacts on individual frogs. Treatment activities conducted within 20 feet of aquatic habitat suitable for Pacific tailed frog could result in injury or mortality of individual frogs. If avoidance of areas within 20 feet of aquatic habitat suitable for this species is not feasible, then focused visual encounter surveys for Pacific tailed frogs would be implemented (pursuant to SPR BIO-10), and if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of Pacific tailed frogs would be implemented (pursuant to Mitigation Measure BIO-2b). |

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| Scott Bar salamander *Plethodon asupak* | — | ST | — | Found only in the vicinity of the Scott River in Siskiyou County. Associated with rocky forested areas, especially thick moss-covered talus. Mostly found in talus slopes or rock crevices, but may move into the forest during very wet periods and reside beneath woody debris. | *May occur*. The range of Scott Bar salamander includes the area near the confluence of the Klamath River and the Scott River, within the Seiad and Horse Creek area of the project area. There are several documented occurrences of this species south of Seiad Valley near Walker Creek, and in the Marble Mountain Wilderness (CNDDB 2022). Rocky areas in forests and talus slopes in the project area may provide habitat suitable for this species.<br>Rocky talus areas that would provide habitat optimal for Scott Bar salamander would not be targeted for treatment. However, during wet periods, individual salamanders may move into forest habitats and take cover under woody debris. Mechanical treatment activities would be limited during wet periods pursuant to several SPRs designed to protect water quality and prevent erosion. However, some prescribed burning, mechanical treatments, or manual treatments could be implemented during periods when Scott Bar salamanders may be present in forest habitats (i.e., outside of rocky talus areas). Treatment activities could result in injury or mortality of salamanders. Prior to implementation of treatment activities in forest habitat that contains rocky areas or is located within approximately 50 feet of rocky talus habitat, focused visual encounter surveys for Scott Bar salamander would be implemented (pursuant to SPR BIO-10); if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of Scott Bar salamanders would be implemented (pursuant to Mitigation Measure BIO-2a).<br>If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA for Scott Bar salamander. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Siskiyou Mountains salamander *Plethodon stormi* | — | ST | — | Mixed conifer habitat of dense, pole-to-mature size, trees. Active above ground only during spring and fall rains. Found under loose rock rubble at the base of talus slopes or under surface objects. Mostly found in talus slopes or rock crevices, but may move into the forest during very wet periods and reside beneath woody debris. | *May occur*. The range of Siskiyou Mountains salamander includes areas north of SR 96 between Happy Camp and Buckhorn Ridge and areas south of SR 96 between Happy Camp and Seiad Valley south to the area north of Bear Lake and Turk Lake. There are many documented occurrences of this species including areas near Grider Creek, Horse Creek, China Creek, Walker Creek, Elk Creek, Slide Creek, East Fork Indian Creek, Fourmile Creek, Fort Goff Creek, and Seiad Creek (CNDDB 2022). Rocky areas in forests and talus slopes in the project area may provide habitat suitable for this species.<br><br>Rocky talus areas that would provide habitat optimal for Siskiyou Mountains salamander would not be targeted for treatment. However, during wet periods, individual salamanders may move into forest habitats and take cover under woody debris. Mechanical treatment activities would be limited during wet periods pursuant to several SPRs designed to protect water quality and prevent erosion. However, some prescribed burning, mechanical treatments, or manual treatments could be implemented during periods when Siskiyou Mountains salamanders were present in forest habitats (i.e., outside of rocky talus areas). Treatment activities could result in injury or mortality of salamanders. Prior to implementation of treatment activities in forest habitat that contains rocky areas or is located within approximately 50 feet of rocky talus habitat, focused visual encounter surveys for Siskiyou Mountains salamander would be implemented (pursuant to SPR BIO-10); if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, biological monitoring would be implemented, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of Siskiyou Mountains salamanders would be implemented (pursuant to Mitigation Measure BIO-2a).<br><br>If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA for Siskiyou Mountains salamander. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Southern long-toed salamander *Ambystoma macrodactylum sigillatum* | — | SSC | — | High elevation meadows and lakes in the Sierra Nevada, Cascade, and Klamath mountains. Aquatic larvae occur in ponds and lakes. Outside of breeding season adults are terrestrial and associated with underground burrows of mammals and moist areas under logs and rocks. Adult southern long-toed salamanders can also be found under wood, logs, rocks, bark, or underground in animal burrows within approximately 330 feet (100 meters) of aquatic habitat. | *May occur*. The range of southern long-toed salamander includes the eastern half of the project area, south and east of Cecilville, east of Sawyer's Bar, and east of the Marble Mountain Wilderness Area. There are several documented occurrences of this species within this portion of its range, including areas near South Fork Salmon River and Shackleford Creek (CNDDB 2022). Meadows, ponds, lakes, and streams in the eastern half of the project area may provide habitat suitable for this species.<br>This analysis assumes that treatment activities conducted greater than approximately 330 feet from aquatic habitat suitable for southern long-toed salamander (i.e., streams, lakes) would avoid impacts on individual salamanders. Treatment activities conducted within 330 feet of aquatic habitat suitable for southern long-toed salamander could result in injury or mortality of individual frogs, if present. If avoidance of areas within 330 feet of aquatic habitat suitable for this species is not feasible, then focused visual encounter surveys for southern long-toed salamander would be implemented (pursuant to SPR BIO-10), and if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, salamanders would be relocated by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of southern long-toed salamanders would be implemented (pursuant to Mitigation Measure BIO-2b). |

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| Southern torrent salamander *Rhyacotriton variegatus* | — | 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. Occasionally found in riparian vegetation adjacent to water, but usually found in contact with water. | *May occur*. The range of southern torrent salamander includes portions of the project area along SR 96 and does not include the Salmon River area of the project area. There are many documented occurrences of this species within this portion of its range, including areas near the Klamath River, Sandy Bar Creek, Eyese Creek, Dobbins Creek, Kennedy Creek, Oak Flat Creek, South Fork China Creek, and West Girder Creek (CNDDB 2022). Streams and seeps in the project area may provide habitat suitable for this species.<br>Treatment activities conducted greater than approximately 20 feet from aquatic habitat suitable for southern torrent salamander (i.e., perennial [Class I and Class II] streams, seeps) would avoid impacts on individual salamanders. Treatment activities conducted within 20 feet of aquatic habitat suitable for southern torrent salamanders could result in injury or mortality of individual salamanders. If avoidance of areas within 20 feet of aquatic habitat suitable for this species is not feasible, then focused visual encounter surveys for southern torrent salamanders would be implemented (pursuant to SPR BIO-10). If individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, salamanders would be relocated by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of southern torrent salamanders would be implemented (pursuant to Mitigation Measure BIO-2b). |
| Western pond turtle *Emys marmorata* | — | SSC | — | Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 1,500 feet (0.5 km) from water for egg-laying. | *May occur*. The range of western pond turtle includes the entire project area, and the species has been documented within the Klamath River (CNDDB 2022). Rivers, streams, ditches, and ponds in the project area may provide aquatic habitat suitable for western pond turtle, and grassland and open woodland habitat adjacent to these features may provide upland habitat suitable for the species.<br>Prior to implementation of treatment activities within approximately 1,500 feet of streams, lakes, and ponds, a focused visual encounter survey for western pond turtle will be implemented (pursuant to SPR BIO-10); if individuals are detected, occupied habitat areas would be flagged and avoided by treatment activities, turtles would be relocated by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury or mortality of western pond turtles would be implemented (pursuant to Mitigation Measure BIO-2b). |

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| **Birds** | | | | | |
| American peregrine falcon *Falco peregrinus anatum* | FD | SD FP | — | Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site. | *May occur*. The range of American peregrine falcon includes the entire project area. There are several documented occurrences of nesting American peregrine falcons in the project area, near Happy Camp, Somes Bar, and Forks of Salmon (CNDDB 2022). Cliffs and banks in the project area may provide nesting habitat suitable for this species.<br>Habitat suitable for nesting American peregrine falcon (i.e., cliffs, banks) would not be targeted for treatment. However, depending on the proximity of treatment activities to nesting habitat, treatment activities conducted during the nesting bird season (February 1–August 31) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If an active American peregrine falcon nest is observed, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer of at least 0.5 mile would be established around the nest within which no treatment activities would occur until the chicks have fledged as determined by a qualified RPF or biologist. |
| Bald eagle *Haliaeetus leucocephalus* | FD | SE FP | — | Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter. | *May occur*. Most of the project area is within the year-round range of bald eagle, and areas north and west of SR 96 (generally, with some exceptions) are within the winter range of bald eagle. Nesting occurrences of bald eagle have been documented near the Klamath River south of Orleans (CNDDB 2022). Large trees in the project area adjacent to the Klamath River may provide nesting habitat suitable for bald eagle.<br>Nesting habitat suitable for bald eagle (i.e., large, old growth, or dominant live trees) would not be targeted for treatment. However, depending on the proximity of treatment activities to nesting habitat, treatment activities conducted during the nesting bird season (February 1–August 31) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If an active bald eagle nest is observed, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer of at least 0.5 mile would be established around the nest within which no treatment activities would occur until the chicks have fledged as determined by a qualified RPF or biologist. |

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| Bank swallow *Riparia riparia* | — | ST | — | Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole. | *Not expected to occur*. The project area is outside of the documented range of bank swallow. Project implementation would not result in impacts on this species. |
| Black swift *Cypseloides niger* | — | SSC | — | Coastal belt of Santa Cruz and Monterey counties; central and southern Sierra Nevada; San Bernardino and San Jacinto Mountains. Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely. | *May occur*. The range of black swift includes the center of the project area between approximately Somes Bar and Cottage Grove. There is one documented occurrence of black swift in the project area, which was a single bird observed during the breeding season near Orleans (CNDDB 2022). While this species would be uncommon in the project area, cliff or canyon habitat in the project area, especially near waterfalls, may provide nesting habitat suitable for black swifts.<br>Nesting habitat suitable for black swift (i.e., cliffs) would not be targeted for treatment. However, treatment activities conducted during the nesting bird season (February 1–August 31) near nesting habitat could disturb active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If an active black swift colony is observed, then Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer of at least 100 feet would be established around the colony within which no treatment activities would occur until the chicks have fledged and the colony is no longer active as determined by a qualified RPF or biologist. |

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| Golden eagle *Aquila chrysaetos* | — | FP | — | Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas. | *May occur*. The range of golden eagle includes the entire project area. The nearest documented golden eagle nesting occurrence is approximately 14 miles east of the project area near Fort Jones (CNDDB 2022). Canyons and large trees in the project area may provide nesting habitat suitable for this species.<br>Nesting habitat suitable for golden eagle (i.e., large trees, cliffs) would not be targeted for treatment. However, depending on the proximity of treatment activities to nesting habitat, treatment activities conducted during the nesting bird season (February 1–August 31) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If an active golden eagle nest is observed, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer of at least 0.5 mile would be established around the nest within which no treatment activities would occur until the chicks have fledged as determined by a qualified RPF or biologist. |
| Great gray owl *Strix nebulosa* | — | SE | — | Resident of mixed conifer or red fir forest habitat, in or on edge of meadows. Requires large diameter snags in a forest with high canopy closure, which provide a cool sub-canopy microclimate. | *Not expected to occur*. The project area is outside of the documented range of great gray owl. Project implementation would not result in impacts on this species. |
| Greater sandhill crane *Antigone canadensis tabida* | — | ST FP | — | Nests in wetland habitats in northeastern California; winters in the Central Valley. Prefers grain fields within 4-mile of a shallow body of water used as a communal roost site; irrigated pasture used as loafing sites. | *Not expected to occur*. The project area is outside of the documented range of greater sandhill crane. Project implementation would not result in impacts on this species. |
| Marbled murrelet *Brachyramphus marmoratus* | FT | SE | — | Feeds near-shore; nests inland along coast from Eureka to Oregon border and from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas fir. | *Not expected to occur*. The project area is too far inland to provide nesting habitat suitable for marbled murrelets, which typically nest within a few miles and up to approximately 15 miles from the coast. Project implementation would not result in impacts on this species. |

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| Northern goshawk *Accipiter gentilis* | — | SSC | — | Nests primarily in conifer forest and aspen stands with high canopy closure (typically greater than 70 percent), relatively high density of large live and dead trees, low density of small trees, and low shrub/sapling and ground cover. Reuses old nests and maintains alternate nest sites. Often nests on gentle to moderate north slopes and near water. Forages in moderately dense, mature forests and younger forests, some openings, and along forest edges. | *May occur*. The range of northern goshawk includes the entire project area. There are several documented northern goshawk nesting occurrences in Klamath National Forest, adjacent to the project area near Orleans, the Salmon River, Ukonom Mountain, and Happy Camp (CNDDB 2022). Forest habitat in the project area may provide nesting habitat suitable for northern goshawk.<br>Large trees, which are typically used by nesting northern goshawks, would not be targeted for treatments. However, treatments may occur within forest habitat suitable for nesting goshawks (e.g., forest stands with large trees, forest stands with high canopy cover), and, depending on the proximity of treatment activities to nesting habitat, treatment activities conducted during the goshawk nesting season (February 1–August 31) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist following established protocols (i.e., *Northern Goshawk Inventory and Monitoring Technical Guide*; US Forest Service 2006) pursuant to SPR BIO-10. Prior to implementing SPR BIO-10 for this species, the project proponent will contact US Forest Service biologists from Klamath National Forest or Six Rivers National Forest, as applicable based on the location of the treatment area, to obtain any recent survey and occurrence data for northern goshawk that have not been made publicly available (e.g., in the CNDDB). If an active northern goshawk nest is observed or reported by US Forest Service biologists within 0.25 mile of a treatment area, then Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer of at least 0.25 mile would be established around the nest within which no treatment activities would occur until the chicks have fledged as determined by a qualified RPF or biologist. |

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| Northern spotted owl<br>*Strix occidentalis caurina* | FT | ST<br>SSC | — | 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. | *May occur*. The northern spotted owl range includes the entire project area. There are many documented nest sites, activity centers, and other observations (e.g., individual owls, pairs) in the vicinity of the project area (CNDDB 2022). Forest habitat with features preferred by northern spotted owl (e.g., old growth characteristics, large trees, high canopy coverage, complex understory features, downed woody debris) may provide nesting or foraging habitat suitable for the species. Most of the forest habitat within the project area, especially in areas where WUI fuel reduction treatments are proposed, does not contain nesting habitat suitable for northern spotted owl due to the habitat's structural characteristics (e.g., small trees, low degree of canopy cover, lack of old growth forest habitat) and existing level of disturbance due to proximity to private lands and development. However, portions of the project area contain or are adjacent to forest habitat that may provide nesting habitat suitable or marginally suitable for northern spotted owl due to the age and composition of the forest stands.<br><br>Large trees, which are typically used by nesting northern spotted owls, would not be targeted for treatments. However, treatments may occur within forest habitat suitable for nesting northern spotted owls (e.g., forest stands with large trees, forest stands with high canopy cover), and, depending on the proximity of treatment activities to nesting habitat, treatment activities conducted during the sensitive period of the nesting season for this species (February 1–July 9) that generate loud and continuous noise (i.e., heavy equipment, multiple vehicles, chainsaws) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Through implementation of the project-specific refinements to SPR BIO-1, SPR BIO 10, Mitigation Measure BIO-1a for northern spotted owl, potential project-related disturbances to active nests would be minimized and avoided through a combination of: 1) existing data review and coordination with the Klamath National Forest or Six Rivers National Forest to obtain known nesting occurrences and best available habitat modeling and mapping (e.g., NSO-EVEG GIS layer) in the project region; 2) protocol-level surveys and/or limited operating periods and no-disturbance buffers for any suitable nesting habitat subject to project disturbances that has not been surveyed for the species recently; and 3) implementation of limited operating periods and no-disturbance buffers around nest sites. The specifications for data review, applicability, timing, and area of northern spotted owl limited operating periods and no-disturbance buffers vary with the type of project activity and other factors, following USFWS guidance, and are described in detail in Attachment A (Standard Project Requirements and Mitigation Measures).<br><br>USFWS-designated critical habitat for northern spotted owl does not include private lands; therefore, critical habitat for northern spotted owl is not present within the project area and would not be affected by project implementation. |

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| Olive-sided flycatcher *Contopus cooperi* | — | SSC | — | Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas fir, redwood, red fir, and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes or other open terrain. | *May occur*. While there are no documented nesting occurrences of olive-sided flycatcher in the project area (CNDDB 2022), the project area is within the range of this species and habitat potentially suitable for nesting olive-sided flycatchers is present in forest habitat in the project area.<br>Treatment activities conducted during the nesting bird season (February 1–August 31) could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. Prior to implementation of treatment activities during the nesting bird season (February 1–August 31), focused nest surveys would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If an active olive-sided flycatcher nest is observed, then Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer of at least 100 feet would be established around the nest within which no treatment activities would occur until the chicks have fledged as determined by a qualified RPF or biologist. |
| Western snowy plover *Charadrius nivosus nivosus* | FT | SSC | — | Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting. | *Not expected to occur*. The project area is outside of the documented range of western snowy plover. Project implementation would not affect this species. |
| Western yellow-billed cuckoo *Coccyzus americanus occidentalis* | FT | SE | — | Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape. | *Not expected to occur*. The project area is within the historic range of western yellow-billed cuckoo; however, this species no longer occupies much of its historic range. The nearest occurrences of western yellow-billed cuckoo are west of the project area near I-5, and are historic (i.e., from 1920 and 1951; CNDDB 2022). The current range of this species no longer includes the project area. Project implementation would not affect this species. |

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| **Fish** | | | | | |
| Chinook salmon - upper Klamath and Trinity Rivers ESU *Oncorhynchus tshawytscha* pop. 30 | FC | SC SSC | — | 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. | *May occur*. The range of the Chinook salmon – upper Klamath and Trinity Rivers ESU includes the entire project area, and this species has been documented in Wooley Creek from the confluence with the Salmon River upstream to the confluence with Big Elk Fork, which is located adjacent to several treatment areas in the project area (CNDDB 2022). Streams and segments of the Klamath River in the project area may provide habitat suitable for this species.<br>Rivers and streams in the project area would not be targeted for treatment. Further, pursuant to SPR HYD-4, WLPZs would be implemented adjacent to streams in the project area, which would limit the types of treatments that would occur adjacent to streams (i.e., mechanical treatments). Because no in-water work would occur and indirect impacts on streams would be avoided through implementation of SPRs, project implementation would not result in impacts on special-status fish species. |
| Coast cutthroat trout *Oncorhynchus clarkii clarkii* | — | SSC | — | Small coastal streams from the Eel River to the Oregon border. Small, low gradient coastal streams and estuaries. Need shaded streams with water temperatures less than 18 C, and small gravel for spawning. | *Not expected to occur*. The project area is outside of the documented range of coast cutthroat trout. Project implementation would not result in impacts on this species. |
| Klamath River lamprey *Entosphenus similis* | — | SSC | — | Upper Klamath River and upper Klamath Lake. Adults need coarser gravel-rubble substrate for spawning. Ammocoetes need sand/mud substrate in shallow pools. | *May occur*. The range of Klamath River lamprey includes most of the project area including the Klamath River and tributary streams to the Klamath River. This species has been documented in several streams in the project area, including Dillon Creek, Clear Creek, Elk Creek, Indian Creek, Thompson Creek, Fort Goff Creek, and Seiad Creek (CNDDB 2022). Streams and creeks in the project area may provide habitat suitable for Klamath River lamprey.<br>Rivers and streams in the project area would not be targeted for treatment. Further, pursuant to SPR HYD-4, WLPZs would be implemented adjacent to streams in the project area, which would limit the types of treatments that would occur adjacent to streams (i.e., mechanical treatments). Because no in-water work would occur and indirect impacts on streams would be avoided through implementation of SPRs, project implementation would not result in impacts on special-status fish species. |
| Lost River sucker *Deltistes luxatus* | FE | SE FP | — | Native to the Lost River system in California and Oregon. Primarily a lake species found in fairly deep water. Adults run up tributary streams to spawn in the spring. | *Not expected to occur*. The project area is outside of the documented range of Lost River sucker. Project implementation would not result in impacts on this species. |

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| Lower Klamath marbled sculpin *Cottus klamathensis polyporus* | — | SSC | — | Common in the Klamath River drainage from Iron Gate Dam downstream to the mouth of the Trinity River. Found in water with summer temperatures of 15–20 degrees C, in coarse substrates (cobble and gravel) where water velocities ranged from slow to swift, in streams with widths greater than approximately 65 feet (20 m). | *May occur*. The range of lower Klamath marbled sculpin includes most of the project area including the Klamath River and tributary streams to the Klamath River. This species has been documented in the Klamath River near Orleans, between Somes Bar and Happy Camp, and Seiad Valley (CNDDB 2022). Streams and segments of the Klamath River in the project area may provide habitat suitable for this species.<br>Rivers and streams in the project area would not be targeted for treatment. Further, pursuant to SPR HYD-4, WLPZs would be implemented adjacent to streams in the project area, which would limit the types of treatments that would occur adjacent to streams (i.e., mechanical treatments). Because no in-water work would occur and indirect impacts on streams would be avoided through implementation of SPRs, project implementation would not result in impacts on special-status fish species. |
| Shortnose sucker *Chasmistes brevirostris* | FE | SE FP | — | Native to the Klamath and Lost River systems in California and Oregon. Spend most of year in open waters of large lakes. They feed on plankton. Spawn in tributary streams. | *Not expected to occur*. The project area is outside of the documented range of shortnose sucker. Project implementation would not result in impacts on this species. |
| Summer-run steelhead trout *Oncorhynchus mykiss irideus* pop. 36 | — | SC SSC | — | Northern California coastal streams south to Middle Fork Eel River. Cool, swift, shallow water and clean loose gravel for spawning, and suitably large pools in which to spend the summer. | *May occur*. The range of summer-run steelhead trout includes the segments of the Klamath River and large tributary streams in the project area. This species has been documented in streams in the project area, including Wooley Creek, Dillon Creek, Clear Creek, Elk Creek, and Indian Creek (CNDDB 2022). Streams and segments of the Klamath River in the project area may provide habitat suitable for this species.<br>Rivers and streams in the project area would not be targeted for treatment. Further, pursuant to SPR HYD-4, WLPZs would be implemented adjacent to streams in the project area, which would limit the types of treatments that would occur adjacent to streams (i.e., mechanical treatments). Because no in-water work would occur and indirect impacts on streams would be avoided through implementation of SPRs, project implementation would not result in impacts on special-status fish species. |
| **Invertebrates** | | | | | |
| Conservancy fairy shrimp *Branchinecta conservatio* | FE | — | — | Endemic to the grasslands of the northern two-thirds of the Central Valley; found in large, turbid pools. Inhabit astatic pools located in swales formed by old, braided alluvium; filled by winter/spring rains, last until June. | *Not expected to occur*. The project area is outside of the documented range of Conservancy fairy shrimp. Project implementation would not result in impacts on this species. |
| Crotch bumble bee *Bombus crotchii* | — | SC | — | Found primarily in California: Mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground. | *Not expected to occur*. While the project area is likely within the historic range of Crotch bumble bee, the current range of this species does not include the Klamath Mountains region. Project implementation would not result in impacts on this species. |

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| Franklin's bumble bee *Bombus franklini* | FE | SC | — | The range of Franklin's bumble bee is restricted to southern Oregon and northern California, including parts of Siskiyou and Trinity counties, and including the project area (Williams et al. 2014; Xerces 2010; Xerces 2018). This species has precipitously declined since 1998. Habitat includes open grassy coastal prairies and meadows. Nests underground. 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. | *May occur*. The project area is within the current range of Franklin's bumble bee. While this species has not been detected in California since 1998, there are several documented occurrences of Franklin's bumble bee in the project area from a 1997 survey effort in the Marble Mountain Wilderness (CNDDB 2022). Since 1998, there have been at least three years of negative survey results since the last known effort (Code and Haney 2006; USFWS 2018; Xerces 2010; Xerces 2018). Based on all of these factors, it is unlikely that Franklin's bumble bees occur in the project area. However, Xerces Society for Invertebrate Conservation has developed a species distribution model using known occurrence data and environmental factors (e.g., temperature, precipitation, elevation, soils) to predict the probability of occurrence of the species throughout its range (Xerces Society 2021). This species distribution model identified potential occurrence locations near the Marble Mountain Wilderness Area, and east of Happy Camp, including the Seiad Valley area (Xerces Society 2021). Additionally, the project area contains floral resources that may provide foraging opportunities for Franklin's bumble bees, as well as overwintering and breeding habitat. Recently, USFWS has identified high priority zones for Franklin's bumble bee based on past observations and habitat conditions surrounding those detection points, potential habitat suitability, and the presence of significant floral resources. Currently, nearly all of the project area is located outside the high priority zones identified by USFWS; however, one location in the southernmost portion of the project area overlaps with a high priority zone (Jordan, pers. comm., 2023). Therefore, absence of this species in the project area cannot be determined with certainty.<br><br>Implementation of treatment activities could result in direct loss of Franklin's bumble bees, if present, or loss of bumble bee habitat. In areas identified by USFWS as high priority zones for Franklin's bumble bee, a limited operating period for mechanical treatment or prescribed burning in meadows from May 15 to September 30 (i.e., the flight/colony/nesting season for the species) will be implemented. If the limited operating period for Franklin's bumble bee is determined to be infeasible for certain treatments and meadow sites within USFWS-defined high priority zones while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, then SPR BIO-10 will be implemented to determine presence or absence of Franklin's bumble bee through surveys, in coordination with the USFWS Yreka office, and confirm applicability of the limited operating period based on presence or absence of the species. Further, as required under Mitigation Measures BIO-2a and BIO-2g, measures to minimize impacts on special-status bumble bees and bumble bee habitat would be implemented if applicable.<br><br>If full implementation of the limited operating period, focused surveys under SPR BIO-10, and applicable measures under Mitigation Measures BIO-2a and BIO-2g are not feasible, potential impacts would remain significant under CEQA, and the |

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| | | | | | project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA and ESA for Franklin's bumble bee. |
| Monarch<br>*Danaus plexippus* | FC | — | — | Monarch butterfly habitat requirements include host plants for larvae; adult nectar sources; and sites for roosting, thermoregulation, mating, hibernation, and predator escape. Additionally, monarch butterfly requires conditions and resources for initiating and completing migration both to and from winter roosting areas.<br>Along their migration routes and on their summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds (*Asclepias* spp.) within the family Apocynaceae upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies. Having both host and nectar plants available from early spring to late fall and along migration corridors is critical to the survival of migrating pollinators.<br>In the Western United States, annual migration patterns for monarch butterflies are related to areas where milkweed grows. Abundance of adult monarchs is driven by annual precipitation that supports late-season milkweeds suitable for caterpillars, and by suitable temperature regimes that allow for completion of the monarch life cycle. During the foraging and breeding season, monarchs are typically found in prairies, meadows, grasslands, and along roadsides (NPS 2017).<br>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. | *May occur*. The project area is outside of the overwintering range of monarch butterfly. However, the project area contains grassland and open woodland habitats with floral resources and likely contains milkweed plants; thus, monarch may forage or breed on the project area.<br>Implementation of treatment activities could result in temporary removal of floral resources, including monarch host plants (i.e., milkweed), or direct mortality of monarch butterflies or larvae. Prior to implementation of treatment activities within habitats suitable for milkweed (i.e., grassland, meadows, riparian habitat, wetlands), focused surveys for monarch butterflies would be conducted by a qualified RPF or biologist or the species would be assumed to be present (pursuant to SPR BIO-10). If focused surveys are conducted and monarchs are not detected, then further mitigation for the species would not be required. If monarchs are detected during focused surveys, or are assumed to be present, then Mitigation Measure BIO-2e would be implemented. Under Mitigation Measure BIO-2e, several measures will be implemented to reduce the likelihood of mortality, injury, or disturbance to monarchs and to maintain habitat function. These measures include retention of host plants (i.e., milkweed) and conducting treatments in a patchy pattern to retain floral resources and provide refuge for butterflies. |
| Shasta crayfish<br>*Pacifastacus fortis* | FE | SE | — | Found only in the Fall and Hat Creek sub-drainages of the Pit River system. Inhabits cool, clear water with low gradient and temp variability; substrate is volcanic rubble on sand/gravel; little veg. | *Not expected to occur*. The project area is outside of the documented range of Shasta crayfish. Project implementation would not result in impacts on this species. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Suckley's cuckoo bumble bee *Bombus suckleyi* | — | SC | — | 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*. | *May occur*. The project area is within the current range of Suckley's cuckoo bumble bee. The nearest documented occurrences of this species are near Orleans, and near Granite Creek, approximately 1.5 miles north of the nearest treatment area (CNDDB 2022). The occurrence near Granite Creek was documented in 2008 and is considered a modern observation of the species. The project area contains floral resources that may provide foraging opportunities for Suckley's cuckoo bumble bees, as well as overwintering and breeding habitat.<br>Implementation of treatment activities could result in direct loss of Suckley's cuckoo bumble bees, if present, or disturbance or loss of bumble bee habitat. Prior to implementation of mechanical treatments or prescribed burning in meadows, a limited operating period prohibiting these activities during the bumble bee flight season (May 15–August 31) would be implemented, if feasible. If the limited operating period is determined to be infeasible for certain treatments and meadow sites while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, MKWC may consult with CDFW on a site- or treatment-specific basis to further evaluate whether the limited operating period would be required for a specific meadow site and treatment prescription. If the limited operating period is determined to be required for meadows occupied or potentially occupied by Suckley's cuckoo bumble bee, MKWC will either: 1) initially implement the limited operating period without further review, or 2) implement SPR BIO-10, which requires surveys to determine presence or absence and confirm the applicability of required protection measures (e.g., the limited operating period) based on presence or absence of the species. Further, as required under Mitigation Measures BIO-2a and BIO-2g, measures to minimize impacts on special-status bumble bees and bumble bee habitat would be implemented if applicable.<br>If full implementation of the limited operating period, focused surveys under SPR BIO-10, and applicable measures under Mitigation Measures BIO-2a and BIO-2g are not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA for Suckley's cuckoo bumble bee. |
| Vernal pool fairy shrimp *Branchinecta lynchi* | FT | — | — | Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools. | *Not expected to occur*. Habitat potentially suitable for vernal pool fairy shrimp (i.e., vernal pools in grassland complex, basalt-flow depression pools) is not present in the project area. Project implementation would not result in impacts on this species. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Vernal pool tadpole shrimp *Lepidurus packardi* | FE | — | — | Inhabits vernal pools and swales in the Sacramento Valley containing clear to highly turbid water. Pools commonly found in grass bottomed swales of unplowed grasslands. Some pools are mud-bottomed and highly turbid. | *Not expected to occur*. The project area is outside of the documented range of vernal pool tadpole shrimp. Project implementation would not result in impacts on this species. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Western bumble bee *Bombus occidentalis* | — | 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. | *May occur*. There are several historic (i.e., 1958, 1964, 1968, 1969) occurrences of western bumble bee in the project area, including near Somes Bar, Orleans, the North and South Fork Salmon River, Clear Creek, and Marble Mountain Wilderness. The project area contains floral resources that may provide foraging opportunities for western bumble bees, as well as overwintering and breeding habitat. Since 1998, there have been multiple survey efforts for Franklin's bumble bee, as described above, and there have been at least three years of negative survey results since the last known effort (Code and Haney 2006; USFWS 2018; Xerces 2010; Xerces 2018). There have been no recent detections of western bumble bee in the vicinity of the project area, and it is likely that this species would have been detected, if present, and documented during surveys for Franklin's bumble bee. Based on all of these factors, it is unlikely that western bumble bees occur in the project area. However, the project area contains floral resources that may provide foraging opportunities for western bumble bees, as well as overwintering and breeding habitat. Therefore, absence of this species in the project area cannot be determined with certainty.<br><br>Implementation of treatment activities could result in direct loss of western bumble bees, if present, or loss of bumble bee habitat. Prior to implementation of mechanical treatments or prescribed burning in meadows, a limited operating period prohibiting these activities during the bumble bee flight season (May 15–August 31) would be implemented, if feasible. If the limited operating period is determined to be infeasible for certain treatments and meadow sites while meeting priority meadow restoration objectives, which may include prescribed burning during summer to result in desired vegetation response and to maximize ecological benefits, MKWC may consult with CDFW on a site- or treatment-specific basis to further evaluate whether the limited operating period would be required for a specific meadow site and treatment prescription. If the limited operating period is determined to be required for meadows occupied or potentially occupied by western bumble bee, MKWC will either: 1) initially implement the limited operating period without further review, or 2) implement SPR BIO-10, which requires surveys to determine presence or absence and confirm the applicability of required protection measures (e.g., the limited operating period) based on presence or absence of the species. Further, as required under Mitigation Measures BIO-2a and BIO-2g, measures to minimize impacts on special-status bumble bees and bumble bee habitat would be implemented if applicable.<br><br>If full implementation of the limited operating period, focused surveys under SPR BIO-10, and applicable measures under Mitigation Measures BIO-2a and BIO-2g are not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA for western bumble bee. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| **Mammals** | | | | | |
| American badger *Taxidea taxus* | — | SCC | — | Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows. | *May occur*. The range of American badger includes the entire project area. While there are no documented occurrences of American badger in the project area (CNDDB 2022), habitat potentially suitable for the species (e.g., grassland, open woodlands, shrubs) is present in the project area.<br><br>Manual treatments would not disturb or remove American badger dens, because these treatments would typically occur within habitats where American badger dens are unlikely to occur (i.e., forest habitat) and because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently crushed would be very low. However, prescribed burning and mechanical treatments could result in direct loss of active dens and potential loss of young. Prior to implementation of prescribed burning and mechanical treatments within or adjacent to grassland, meadow, or open woodland habitats, focused surveys for American badger dens would be conducted by a qualified RPF or biologist no more than 14 days prior to the start of treatment activities (pursuant to SPR BIO-10). If American badger dens are detected, then Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist. |
| California wolverine *Gulo gulo* | — | ST FP | — | 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 and den area. Hunts in more open areas. Can travel long distances. | *Not expected to occur*. The project area is within the historic range of California wolverine and there are several documented occurrences of the species within or in the vicinity of the project area from the 1960s, 1970s, and 1980s (CNDDB 2022). Wolverine no longer occupies much of its historic range and was thought to be extinct from California until a single wolverine was detected in Nevada County, approximately 175 miles southeast of the project area (CNDDB 2022). There have been no documented occurrences of wolverine in Siskiyou County since the 1980s. Project implementation would not affect this species. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Fisher - West Coast DPS *Pekania pennanti* | — | SSC | — | Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest. | *May occur*. The fisher range includes the entire project area. There are many documented occurrences of fisher in the project area including near Orleans, Somes Bar, and Forks of Salmon (CNDDB 2022). Forest habitat in the project area with features preferred by this species (e.g., large trees, mature forest) may provide habitat suitable for fisher.<br>Den habitat optimal for fisher (i.e., large trees and snags with cavities) would not be targeted for treatment. However, downed woody debris that may also provide den habitat would be targeted for treatment. Outside of the breeding season, fishers would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments would not adversely affect fisher dens, because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently destroyed would be very low. However, prescribed burning and mechanical treatments conducted during the fisher maternity season (i.e., the period during which young would be present in a den, approximately March 1–June 30) and within forest habitats suitable for fisher, could result in destruction of active dens in downed woody debris piles, or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Prior to implementation of prescribed burning and mechanical treatments during the fisher maternity season (March 1–June 30), focused surveys for fisher using trail cameras, track plates, and other non-invasive survey methods would be conducted (pursuant to SPR BIO-10). If fishers are detected during focused surveys, then additional surveys by a qualified RPF or biologist would be required to determine whether an active fisher den is present within a treatment area. If an active den is identified in a treatment area, then Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Gray wolf<br>*Canis lupus* | FD | SE | — | Habitat generalists, historically occupying diverse habitats including tundra, forests, grasslands, and deserts. Primary habitat requirements are the presence of adequate ungulate prey, water, and low human contact. Wolf pups are born in a natal den, which is typically a hole in the ground, a rock crevice, a hollow log, bases of hollow trees, an overturned stump, or other quiet location (American Society of Mammalogists 1974; Wisconsin Department of Natural Resources 2016). Gray wolf pups are born altricial (i.e., blind, helpless) and do not open their eyes for approximately two weeks. After approximately eight weeks, the pups are moved to a different location called a "rendezvous site." Rendezvous sites, which are usually within 1 mile of a den site, are typically open areas of grass or sedge adjacent to wetlands, and can be characterized by extensive matted vegetation, numerous trails, and beds usually at the forest edge (Wisconsin Department of Natural Resources 2016). Rendezvous sites are typically used from mid-May to mid-October, and wolf packs may use multiple rendezvous sites within their home ranges (Wisconsin Department of Natural Resources 2016). | *May occur*. The project area is within the historic range of gray wolf; however, no gray wolf individuals or packs have been documented in the project area and the nearest documented pack is approximately 37 miles east of the project area near Mt. Shasta (CDFW 2022). While gray wolves do not currently occupy the project area, it is possible that individual, uncollared gray wolves could disperse through the project area occasionally. It is also possible that additional packs could establish home ranges within or overlapping the project area during the life of the proposed project.<br>Most of the project area does not contain habitat suitable for gray wolves because individual treatment areas are located primarily in areas with existing human disturbance (e.g., homes, roads, highways, recreational facilities). However, some portions of the project area are relatively remote and may provide habitat suitable for gray wolves. Treatment activities, including manual treatments, mechanical treatments, and prescribed burning could result in loss or disturbance of active natal dens and potential loss of helpless young if present in treatment areas. While manual treatments would be less impactful than mechanical treatments because heavy equipment would not be used, these activities would include the use of loud hand-operated power tools (e.g., chainsaws) and presence of personnel or vehicles, which could result in disturbance to nearby natal dens or rendezvous sites, and potential abandonment of these sites. Prior to implementing treatment activities in habitat suitable for gray wolves (as determined by a qualified RPF or biologist), the project proponent would contact CDFW to obtain general information about documented gray wolf activity within a treatment area. If information provided from CDFW indicates current or prior gray wolf activity within a treatment area (e.g., occurrences, overlapping home range), then treatment activities will not be initiated in the treatment area until CDFW has provided further guidance, and Mitigation Measure BIO-2a would be implemented. Additional surveys may be required to determine whether an active gray wolf den or rendezvous site is present in or adjacent to the treatment area. Pursuant to Mitigation Measure BIO-2a, a no-disturbance buffer of at least one mile will be established around any identified gray wolf dens or rendezvous sites and no treatment activities that create loud and continuous noise will be implemented within the no-disturbance buffer through June 30 for a natal den or through August 31 for a rendezvous site. |

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| Humboldt marten *Martes caurina humboldtensis* | FT | SE SSC | — | Typically associated with late-successional coniferous forests; prefers forests with low, overhead cover. Some studies have shown that old-growth forest structure characteristics are not required by this species, and have found associations with dense ericaceous shrub cover (e.g., salal [*Gaultheria shallon*]) in the understory, mast producing trees like tanoak, and high proportion of pine species (Moriarty et al. 2021). | *May occur*. Most of the project area is located outside the current range and distribution of Humboldt marten. The current range of Humboldt marten includes the western portion of the project area, in the vicinity of SR 96 from approximately Happy Camp to the west. Humboldt marten has been detected in the vicinity of the project area south of Happy Camp near Elk Creek, near North Fork Salmon River, and more extensively west of SR 96 (CNDDB 2022). Forest habitat in the project area with large trees suitable for denning and resting may provide habitat suitable for Humboldt marten. For this analysis, suitable habitat is defined as denning, resting, and foraging habitat, which corresponds with USFWS's nomenclature and definition of this habitat category. USFWS has described the specific physical or biological features (PBFs) that define breeding, denning, resting, and foraging habitat, referred to as "PBF 1" (USFWS 2021). Based on the Six Rivers National Forest habitat suitability model and GIS layer for Humboldt marten, which specifically identifies habitat modeled as PBF 1, the project area contains very little predicted denning, resting, and foraging habitat; these areas are limited primarily to small patches along the westernmost portion of the project area.<br><br>Because most of the project area is located east of the current range of Humboldt marten and does not contain modeled denning, resting, or foraging habitat, the likelihood of project implementation to adversely affect Humboldt marten is considered low. Additionally, habitat structural features considered optimal for Humboldt marten denning (i.e., large trees and snags with cavities) would not be targeted for treatment. However, downed woody debris, which may provide den habitat in the western portion of the project area within the current species range, would be targeted for treatment. Outside of the breeding season, Humboldt martens could flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments would not result in adverse effects on marten dens, because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently destroyed would be very low. However, prescribed burning and mechanical treatments conducted during the Humboldt marten maternity season (i.e., the period during which young would be present in a den, approximately March 1–June 30) and within forest habitats suitable for martens, could result in destruction of active dens in downed woody debris piles, or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Prior to implementation of prescribed burning and mechanical treatments during the Humboldt marten maternity season (March 1–June 30), focused surveys for martens using trail cameras, track plates, and other non-invasive survey methods would be conducted (pursuant to SPR BIO-10). If Humboldt martens are detected during focused surveys, then additional surveys by a qualified RPF or biologist would be required to determine whether an active marten den is present within a treatment area. If an active den is identified in a treatment area, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| | | | | | of at least 0.25 mile would be established around the den, and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.<br>If full implementation of Mitigation Measure BIO-2a is not feasible, impacts would remain significant under CEQA, and the project proponent would implement Mitigation Measure BIO-2c, which may entail acquiring an incidental take permit under CESA and ESA for Humboldt marten.<br>Approximately 2,320 acres of USFWS-proposed critical habitat for Humboldt marten is present within the project area; USFWS has not yet issued a final critical habitat designation for the species. Critical habitat designations do not affect activities by private landowners if there is no federal nexus — that is, if no federal funding is being used to implement the project or no federal permits are required to implement the activity. |
| Pallid bat<br>*Antrozous pallidus* | — | SSC | — | Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites. | *May occur*. The range of pallid bat includes the entire project area. While there are no documented occurrences of pallid bat in the project area (CNDDB 2022), Roost habitat (e.g., rocky areas, large trees with cavities) suitable for pallid bat is present throughout the project area.<br>Implementation of treatment activities during the bat maternity season (April 1–August 31; Caltrans 2004) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel) or smoke (e.g., prescribed burning), potentially resulting in abandonment of the roost and loss of young. Prior to implementing treatments during the bat maternity season (April 1–August 31), focused surveys for pallid bat and other special-status bats would be implemented by a qualified RPF or biologist within habitat suitable for these species (pursuant to SPR BIO-10). If special-status bat roosts are identified, Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer of 250 feet would be established around active special-status bat roosts. No treatment activities would occur within this buffer until the roosts are no longer active as determined by the qualified RPF or biologist. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Ringtail<br>*Bassariscus astutus* | — | FP | — | Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations. Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and shrubs. | *May occur*. Habitat potentially suitable for ringtail denning (e.g., large trees with cavities, dense shrubs, rocky areas) is present in the project area and ringtails likely forage throughout forest, shrub, and riparian habitats in the project area.<br>Den habitat optimal for ringtail (i.e., large trees and snags with cavities) would not be targeted for treatment. However, dense shrubs, which may provide den habitat suitable for this species, would be targeted for treatment. Outside of the breeding season, ringtails would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments would not adversely affect ringtail maternity dens, because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently destroyed would be very low. However, prescribed burning and mechanical treatments conducted during the ringtail maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30) and within habitats suitable for ringtail, could result in destruction of active dens in dense shrubs, or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Prior to implementation of prescribed burning and mechanical treatments during the ringtail maternity season (April 15–June 30), focused surveys for ringtail using trail cameras, track plates, and other non-invasive survey methods would be conducted (pursuant to SPR BIO-10). If ringtails are detected during focused surveys, then additional surveys by a qualified RPF or biologist would be required to determine whether an active ringtail den is present within a treatment area. If an active den is identified in a treatment area, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist in consultation with CDFW, and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.<br>If the presence of ringtail within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a before and during implementation of mechanical treatments and prescribed burning between April 15 and June 30. Avoidance and minimization measures would include but not be limited to pre-treatment den surveys, daily sweeps of the treatment area, and biological monitoring. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Roosevelt elk *Cervus canadensis roosevelti* | — | — | — | Breed in open, brushy stands of many deciduous and conifer habitats with abundant water. Feed in riparian areas, meadows, and herbaceous and brush stages of forest habitats. Require mature stands of deciduous and conifer forest habitats. Dense brush understory is used for escape and cover. Herds are sedentary within an annual home range or migrate altitudinally. During the rut (August–November), bulls defend movable breeding territories consisting of cow harems. | *May occur*. The project area is within the documented range of Roosevelt elk, which includes Humboldt, Del Norte, Trinity, and western Siskiyou counties. Roosevelt elk is not considered a special-status species, but is identified as a sensitive resource in the Humboldt County General Plan.<br>Treatment activities would not result in substantial degradation of breeding or foraging habitat for Roosevelt elk and may improve habitat for the species by thinning dense forests. Further, Roosevelt elk is not a special-status species and is not considered rare in the project region. Therefore, substantial adverse effects on Roosevelt elk are unlikely to occur, and mitigation would not be required. |
| Sierra Nevada red fox – southern Cascades DPS *Vulpes vulpes necator* pop. 1 | — | ST | — | Use multiple habitat types in the alpine and subalpine zones including high-elevation conifer dominated by whitebark pine and mountain hemlock, as well as meadows and fell-fields. May descend in winter to below subalpine zone consisting of red and white fir; as low as 1,400 meters (4,600 feet). | *Not expected to occur*. The project area is within the historic range of Sierra Nevada red fox; however, the current range of this species is limited to two populations near Lassen Peak and Sonora Pass. Project implementation would not result in impacts on this species. |
| Sonoma tree vole *Arborimus pomo* | — | SSC | — | North coast fog belt from Oregon border to Sonoma County. In Douglas fir, redwood, and montane hardwood-conifer forests. Feeds almost exclusively on Douglas fir needles. Will occasionally take needles of grand fir, hemlock, or spruce. The species nests most often in the canopy of live, large-diameter Douglas fir trees (i.e., greater than approximately 20 inches dbh) (Dunk and Hawley 2009). | *May occur*. The range of Sonoma tree vole includes only the portion of the project area surrounding Orleans. There are no documented occurrences of Sonoma tree vole in the project area; however, forest habitat in the vicinity of Orleans dominated by Douglas fir may provide habitat suitable for this species.<br>Nesting habitat optimal for Sonoma tree voles (i.e., large, old-growth trees) would not be targeted for treatment. Therefore, adverse effects on Sonoma tree voles are unlikely to occur and mitigation would not be required. |

| Species | Status[1] Federal | Status[1] State | Status[1] CRPR/ Other | Habitat and Blooming Period (i.e., for special-status plants) | Potential for Occurrence/Potential Impact |
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| Townsend's big-eared bat *Corynorhinus townsendii* | — | SSC | — | Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance. | *May occur*. The range of Townsend's big-eared bat includes the entire project area. Townsend's big-eared bats have been documented roosting under bridges over the Klamath and Salmon rivers as well as within mines in the project area, including documented maternity roosts (CNDDB 2022). Roost habitat potentially suitable for Townsend's big-eared bat, including mines, caves, abandoned buildings, bridges, and culverts is present throughout the project area.<br>Implementation of treatment activities during the bat maternity season (April 1–August 31; Caltrans 2004) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel) or smoke (e.g., prescribed burning) potentially resulting in abandonment of the roost and loss of young. Prior to implementing treatments during the bat maternity season (April 1–August 31), focused surveys for Townsend's big-eared bat and other special-status bats would be implemented by a qualified RPF or biologist within habitat suitable for these species (pursuant to SPR BIO-10). If special-status bat roosts are identified, Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer of 250 feet would be established around active special-status bat roosts. No treatment activities would occur within this buffer until the roosts are no longer active as determined by the qualified RPF or biologist. |
| Western red bat *Lasiurus blossevillii* | — | SSC | — | Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging. | *Not expected to occur*. The project area is outside of the documented range of western red bat. Project implementation would not result in impacts on this species. |

Note: CNDDB = California Natural Diversity Database; DPS= Distinct Population Segment; CRPR = California Rare Plant Rank

[1] Legal Status Definitions

**Federal:**

FE Endangered (legally protected)
FT Threatened (legally protected)
FC Candidate for Listing under ESA
FP Proposed for Listing under ESA

**State:**

SE Endangered (legally protected)
ST Threatened (legally protected)
SC Candidate for Listing under CESA (legally protected)
FP Fully protected (legally protected)
SR Rare (legally protected by NPPA)
SSC Species of special concern (no formal protection other than CEQA consideration)

**California Rare Plant Ranks:**

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

Threat Ranks

0.1-Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)

0.2-Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat)

0.3-Not very threatened in California (less than 20 percent of occurrences threatened/low degree and immediacy of threat or no current threats known)

Sources: American Society of Mammalogists 1974; Calflora 2022; Caltrans 2004; CCH2 2022; CDFW 2018b; CDFW 2022; CNDDB 2022; CNPS 2022; Dunk and Hawley 2009; Levine et. al 2008; Moriarty et al. 2021; NatureServe 2022; NPS 2017; USFWS 2012; USFWS 2018; US Forest Service 2006; Williams et al. 2014; Wisconsin Department of Natural Resources 2016; Xerces Society 2010; Xerces Society 2018; Xerces Society 2021.

# SENSITIVE NATURAL COMMUNITIES

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, several species associated with sensitive natural communities were observed, including California bay (*Umbellularia californica*), bigleaf maple (*Acer macrophyllum*), Douglas fir (*Pseudotsuga menziesii*), incense cedar (*Calocedrus decurrens*), tanoak (*Notholithocarpus densiflorus*), California buckeye (*Aesculus californica*), Oregon white oak (*Quercus garryana*), and cottonwood (*Populus* spp.). While all dominant species associated with sensitive natural communities included in Table B-3 were not observed during the reconnaissance-level survey, these communities may be present. Not all parts of project area were observed during the reconnaissance survey, and the survey intensity was not sufficient to identify vegetation to alliance level, so additional sensitive natural communities may be present (including those identified in Table B-3). Implementation of SPR BIO-3 is required to map sensitive natural communities prior to treatment.

Based on review of species ranges, occurrence data, vegetation mapping, aerial photos, habitat present, and reconnaissance-level survey, there are 41 sensitive natural communities with potential to occur in the CWHR habitat types present in the project area, which include Baker cypress stand, Port Orford cedar forest (*Chamaecyparis lawsoniana*), Alaska yellow-cedar stand (*Callitropsis nootkatensis*), Pacific silver fir forest (*Abies amabilis*), California buckeye grove (*Aesculus californica*), mountain alder thicket (*Alnus incana*), and resin birch thicket (*Betula glandulosa*). As required by Mitigation Measure BIO-3a, prescribed burning will be the primary treatment activity in sensitive natural communities that are fire-dependent (e.g., chaparral alliances characterized by fire-stimulated, obligate seeders, such as hairy leaf ceanothus), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009). 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 Mitigation Measure BIO-3b.

**Table B-3 Sensitive Natural Communities Documented or with Potential to Occur in the Project Area**

| Sensitive Natural Community[1] | Rarity Rank[2] | Habitat Type |
|---|---|---|
| Baker cypress stand | S2.2 | Closed-Cone Pine-Cypress |
| Beach pine forest and woodland | S3 | Closed-Cone Pine-Cypress |
| McNab cypress woodland | S3 | Closed-Cone Pine-Cypress |
| California bay forest | S3 | Coastal Oak Woodland |
| Bigleaf maple forest | S3 | Douglas Fir; Montane Hardwood; Montane Hardwood-Conifer |
| Port Orford cedar forest | S3.1 | Douglas Fir |
| Douglas fir – incense cedar forest | S3 | Douglas Fir |
| Douglas fir – tanoak forest | S3 | Douglas Fir |
| Western hemlock forest | S2 | Douglas Fir |
| Pacific silver fir forest | S1 | Klamath Mixed Conifer |
| Subalpine fir forest | S2 | Klamath Mixed Conifer |
| Alaska yellow-cedar stand | S1 | Klamath Mixed Conifer |
| Brewer spruce forest | S2 | Klamath Mixed Conifer |
| Engelmann spruce forest | S2 | Klamath Mixed Conifer; Subalpine Conifer |
| California buckeye grove | S3 | Montane Hardwood |
| Tanoak forest | S3.2 | Montane Hardwood |
| Oregon white oak woodland | S3 | Montane Hardwood |
| Bigleaf maple forest and woodland | S3 | Montane Hardwood; Montane Hardwood-Conifer |

| Sensitive Natural Community[1] | Rarity Rank[2] | Habitat Type |
|---|---|---|
| Rocky Mountain maple thicket | S3? | Montane Riparian |
| Mountain alder thicket | S3 | Montane Riparian |
| Sitka alder thicket | S3? | Montane Riparian |
| Resin birch thicket | S2? | Montane Riparian |
| Water birch thicket | S3 | Montane Riparian |
| Torrent sedge patch | S3 | Montane Riparian; Valley Foothill Riparian |
| Fremont cottonwood forest | S3.2 | Montane Riparian; Valley Foothill Riparian |
| Black cottonwood forest | S3 | Montane Riparian; Valley Foothill Riparian |
| Jepson willow thicket | S3 | Montane Riparian |
| Wild grape shrubland | S3 | Montane Riparian; Valley Foothill Riparian |
| Red fir – white fir forest | S3 | Red Fir; White Fir |
| Foxtail pine woodland | S3 | Subalpine Conifer |
| Button willow thicket | S2 | Valley Foothill Riparian |
| Hairy leaf ceanothus chaparral | S3 | Mixed Chaparral |
| Hoary, common, and Stanford manzanita chaparral | S3 | Mixed Chaparral |
| Shrub tanoak chaparral | S3 | Mixed Chaparral |
| Bush chinquapin chaparral | S3.3 | Montane Chaparral |
| Sadler oak or deer oak brush fields | S3 | Montane Chaparral |
| Water foxtail meadow | S3? | Perennial Grassland |
| Small-fruited sedge meadow | S2? | Perennial Grassland |
| California oat grass prairie | S3 | Perennial Grassland |
| Idaho fescue grassland | S3 | Perennial Grassland |
| Ashy ryegrass – creeping ryegrass turf | S3 | Perennial Grassland |

[1] These are designated sensitive natural communities with a state rarity rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable)

[2] Older ranks, which need to be updated by CDFW, may still contain a decimal "threat" rank of .1, .2, or .3, where .1 indicates very threatened status, .2 indicates moderate threat, and .3 indicates few or no current known threats. A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this rank.

Source: Sawyer et al. 2009, Compiled by Ascent Environmental in 2022.

# SENSITIVE HABITATS

## Oak Woodland

Oregon white oak woodland, coastal oak woodland, and blue oak woodland have been identified (see Table B-1 and B-3) as potentially present in the project area. During the reconnaissance-level survey conducted on February 24–25, 2023, several oak species were observed, including Oregon white oak (*Quercus garryana*), black oak (*Quercus kelloggii*), interior live oak (*Quercus wislizeni*), and canyon live oak (*Quercus chrysolepis*). Mitigation Measure BIO-3a requires treatments be designed to replicate the fire regime attributes for the affected oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fire line intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009). If treatment activities within identified oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas. After implementation of Mitigation Measure BIO-BIO-3a, if impacts to oak woodland habitat remain significant under CEQA, then Mitigation Measure BIO-3b would apply.

# Riparian Habitat

The project area contains numerous perennial (Class I) (e.g., Klamath River and Salmon River), intermittent (Class II), and ephemeral (Class III) streams. Riparian habitat is present adjacent to segments of some Class I streams in the project area and is generally present along Class II streams. WLPZs ranging from 50 to 100 feet will be established adjacent to all Class I and II streams within the project area. While these measures would reduce potential impacts on riparian habitat, the extent of riparian habitat within the project area has not been mapped and riparian habitat may be present outside of the areas incorporated within WLPZs. Additionally, the WLPZ is not a no-disturbance area and up to 25 percent vegetation removal is allowed in WLPZs. SPR BIO-4 requires that 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation mapped during surveys conducted pursuant to SPR BIO-3 be retained, that treatments are limited to uncharacteristic fuel loads, and that large, native riparian hardwoods be retained. After implementation of SPR BIO-4, if impacts to riparian habitat remain significant under CEQA, then Mitigation Measures BIO-3c would apply in these areas.

# Chaparral

As described in Table B-1, chaparral habitat (i.e., montane chaparral and mixed chaparral) is present in the project area. The project area contains approximately 1,195.8 acres of chaparral. Chaparral habitat observed in the project area during the reconnaissance-level survey included manzanita (e.g., whiteleaf manzanita [*Arctostaphylos viscida*], hoary manzanita [*Arctostaphylos canescens*], common manzanita [*Arctostaphylos manzanita*]), buckbrush (*Ceanothus cuneatus*), toyon (*Heteromeles arbutifolia*), and coyote brush (*Baccharis pilularis*) with small, scrubby oaks interspersed (e.g., interior live oak, canyon live oak, Oregon white oak). Some areas of chaparral habitat included or were dominated by nonnative broom species (e.g., scotch broom [*Cytisus scoparius*], French broom [*Genista monspessulana*]). Some portions of the project area where chaparral habitat was observed were not mapped as chaparral in the CAL FIRE FRAP vegetation mapping. Some portions of the project area mapped as chapparal in the CAL FIRE FRAP vegetation mapping contained conifer saplings or pole stands and did not contain any chaparral species (i.e., the vegetation mapping was inaccurate). It is likely that many areas mapped as chaparral in the project area do not contain chaparral habitat; however, it is also likely that some of the chaparral habitat in the project area has not been mapped accurately.

All chaparral habitats are subject to the provisions of SB 1260 (Statutes of 2019), which prohibit type conversion in chaparral and coastal sage scrub communities. SPR BIO-5 requires that treatments be designed to avoid the environmental effects of type conversion within chaparral habitat by maintaining a minimum percent cover of mature shrubs and by maintaining habitat function. Specifically, for ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral vegetation types, a minimum of 35 percent of existing shrubs and associated native vegetation will be retained at existing densities, and that a range of middle to old age classes be retained.

# Wetlands

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, multiple types of aquatic habitat were observed, including the Klamath and Salmon rivers, perennial and intermittent streams, ponds, and wetlands. CAL FIRE's FRAP vegetation data for the project area includes approximately 100 acres of lacustrine habitat (i.e., reservoirs, lakes, ponds), 573 acres of riverine habitat, and 49 acres of wet meadow habitat (Table B-1). The National Wetlands Inventory (NWI) classifies the project area as having approximately 52 acres of freshwater emergent wetland, 320 acres of freshwater forested/shrub wetland, 17 acres of freshwater pond, 41 acres of lake, and 1,171 acres of riverine habitat. Wetlands mapped by NWI as fresh emergent wetlands likely include wet meadows (USFWS 2022b). Aquatic habitats are mapped at a coarse scale in both the FRAP and NWI databases and without field verification.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, wet meadows, springs, and seeps. Many types of aquatic habitats, including fresh emergent wetlands, are not associated with lakes

or streams, and would not be protected by implementation of SPR HYD-4 WLPZs. Mitigation Measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of wetland features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, seeps, and other wetlands; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). A larger buffer may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., Cascades frog, foothill yellow-legged frog, Pacific tailed frog, western pond turtle; see Impact BIO-1 and Impact BIO-2).

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Caltrans. *See* California Department of Transportation.

CCH2. *See* Consortium of California Herbaria 2.

CDFW. *See* California Department of Fish and Wildlife.

CNDDB. *See* California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

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# Attachment C

## Hazardous Materials

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

ENVIROSTOR

## PROJECT SEARCH RESULTS

STATUS: All Statuses GO

**SEARCH CRITERIA:** SISKIYOU

28 RECORDS FOUND EXPORT TO EXCEL

| | | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|---|
| [REPORT] | [MAP] | AMERICAN FABRIC CARE | 47720001 | EVALUATION | INACTIVE - NEEDS EVALUATION | 490 SOUTH BROADWAY | YREKA | 96097 |
| [REPORT] | [MAP] | BLUE LEDGE MINE | 60001382 | FEDERAL SUPERFUND LISTED | - ACTIVE | 2 MILES SOUTH OF OREGON ON ROAD 1060 | ROGUE RIVER NATIONAL FOREST | 00000 |
| [REPORT] | | CHAMPION INTERNATIONAL | 47240005 | HISTORICAL | NO FURTHER ACTION | JUNCTION AVENUE/TUCCI AVENUE | MCCLOUD | 96057 |
| [REPORT] | [MAP] | HI-RIDGE LUMBER COMPANY | 47240011 | EVALUATION | REFER: RWQCB | 329 S. PHILLIPE LANE | YREKA | 96097 |
| [REPORT] | [MAP] | HJERTAGER MILL | 47240004 | EVALUATION | REFER: OTHER AGENCY | 318 WILDCAT CREEK ROAD | CALLAHAN | 96014 |
| [REPORT] | [MAP] | J H BAXTER & CO-WEED | CAD000625731 | HAZ WASTE - RCRA | CLOSED | 422 MILL STREET | WEED | 960940000 |
| [REPORT] | [MAP] | J H BAXTER & CO-WEED | 80001301 | CORRECTIVE ACTION | REFER: SMBRP | 422 MILL STREET | WEED | 960940000 |
| [REPORT] | [MAP] | J H BAXTER CO | 47240001 | FEDERAL SUPERFUND LISTED | - CERTIFIED / OPERATION & MAINTENANCE - LAND USE RESTRICTIONS | 422 MILL STREET | WEED | 96094 |
| [REPORT] | [MAP] | MASSIVE VOLCANIC SULFIDE MINE DISCOVERY PROJECT | 60002353 | EVALUATION | NO ACTION REQUIRED | NORTHERN AND CENTRAL CALIFORNIA: COUNTIES OF SISKIYOU, SHASTA, TRINITY, BUTTE, YUBA, NEVADA, PLACER, AMADOR, CALAVERAS, TUOLUMNE AND MARIPOSA | MULTIPLE | 00000 |
| [REPORT] | | MCCLOUD RIVER RAILROAD CO | 47400001 | EVALUATION | REFER: RWQCB | JUNCTION AVENUE | MCCLOUD | 96057 |
| [REPORT] | [MAP] | MONTAGUE AUXILIARY FIELD (J09CA0875) | 80000591 | MILITARY EVALUATION | NO FURTHER ACTION | | MONTAGUE | |

| | | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|---|
| [REPORT] | | MOUNT HEBRON WORK CENTER | 47080001 | VOLUNTARY CLEANUP | REFER: RWQCB | MOUNT HEBRON COURT ROAD | MOUNT HEBRON | 96066 |
| [REPORT] | [MAP] | MOUNT SHASTA GAS DISPERSION TEST SITE (J09CA7275) | 80000946 | MILITARY EVALUATION | NO FURTHER ACTION | | MT.SHASTA | |
| [REPORT] | [MAP] | NOR-CAL PRODUCTS COMPANY | 47240010 | EVALUATION | REFER: RWQCB | 1512 SOUTH OREGON STREET | YREKA | 96097 |
| [REPORT] | [MAP] | OLD COUNTY YARD | 60000984 | EVALUATION | INACTIVE - ACTION REQUIRED | 1455 SOUTH MAIN STREET | YREKA | 96097 |
| [REPORT] | [MAP] | PINE MOUNTAIN LUMBER COMPANY | 47240006 | VOLUNTARY CLEANUP | ACTIVE | HIGHWAY 3 | YREKA | 96097 |
| [REPORT] | [MAP] | PONDOSA MILL | 47240003 | EVALUATION | INACTIVE - NEEDS EVALUATION | HWY 89 / PONDOSA ROAD | PONDOSA | 96057 |
| [REPORT] | [MAP] | QUARTZ VALLEY STAMP MILL | 47100001 | EVALUATION | INACTIVE - NEEDS EVALUATION | 11000 BLOCK QUARTZ VALLEY ROAD | GREENVIEW | 96037 |
| [REPORT] | | RED PORPHYRY MINE | 47100002 | EVALUATION | REFER: OTHER AGENCY | TOWNSHIP 48 NORTH, RANGE 8 WEST, SECT 14 | HORNBROOK | 96044 |
| [REPORT] | [MAP] | ROSEBURG LUMBER MILL IN MT. SHASTA | 60000458 | VOLUNTARY CLEANUP | INACTIVE - ACTION REQUIRED | HIGHWAY 5 AND SOUTH MT. SHASTA BLVD. THE SITE IS IN TOWNSHIP 40 NORTH, RANGE 4 WEST, SECTION 21 AND 22 | MT. SHASTA | 96067 |
| [REPORT] | [MAP] | SISKIYOU BOMBING TARGET - (J09CA1072) - MMRP | 80000709 | MILITARY EVALUATION | NO FURTHER ACTION | | MACDOEL | |
| [REPORT] | [MAP] | SISKIYOU COUNTY AIRPORT - (J09CA0950) - IR | 80000683 | MILITARY EVALUATION | NO FURTHER ACTION | MONTAGUE ROAD | MONTAGUE | 96064 |
| [REPORT] | | SISKIYOU PLANING MILL | 47240009 | HISTORICAL | REFER: OTHER AGENCY | OBERLIN ROAD | YREKA | 96097 |
| [REPORT] | [MAP] | SISKIYOU POL ANNEX | 80000159 | MILITARY EVALUATION | NO FURTHER ACTION | | MONTAGUE | |
| [REPORT] | [MAP] | THE LANDING-OLD MILL SECTION | 60002107 | VOLUNTARY CLEANUP | ACTIVE | MOUNT SHASTA BOULEVARD AND MOUNTAIN VIEW DRIVE | CITY OF MOUNT SHASTA | 96067 |
| [REPORT] | [MAP] | TULE LAKE POW CAMP | 80000771 | MILITARY EVALUATION | NO FURTHER ACTION | | TULE LAKE | |

| | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|
| [REPORT] | WORLD CIRCUITS, INC | 47360001 | HISTORICAL | REFER: RWQCB | OLD HIGHWAY 99 | GAZELLE | 96034 |
| [REPORT] [MAP] | YREKA GAP FILLER ANNEX (J09CA1006) | 80000781 | MILITARY EVALUATION | NO FURTHER ACTION | | YREKA | |

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
ENVIROSTOR

## PROJECT SEARCH RESULTS

STATUS: All Statuses GO

**SEARCH CRITERIA:** HUMBOLDT

62 RECORDS FOUND EXPORT TO EXCEL

| | | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|---|
| [REPORT] | | ARCATA COMMUNITY HEALTH CENTER | 60002941 | CALMORTGAGE | NO ACTION REQUIRED | 1150 FOSTER AVENUE | ARCATA | 9552 |
| [REPORT] | | BAR ALE | 12070001 | HISTORICAL | REFER: RWQCB | 989 MILTON | FERNDALE | 9553 |
| [REPORT] | | BEAVER LUMBER COMPANY OF ARCATA | 12240117 | HISTORICAL | REFER: RWQCB | 1220 5TH STREET | ARCATA | 9552 |
| [REPORT] | [MAP] | BIG LAGOON BOMBING TARGET (IND RESERV) (J09CA0064) | 80000155 | STATE RESPONSE | NO FURTHER ACTION | | BIG LAGOON | |
| [REPORT] | [MAP] | BIG LAGOON TARGET RANGE | 80001175 | MILITARY EVALUATION | NO FURTHER ACTION | | BIG LAGOON | |
| [REPORT] | | BOB BRITT LUMBER CO. | 12240007 | HISTORICAL | REFER: RWQCB | 2566 MYRTLE | EUREKA | 9550 |
| [REPORT] | [MAP] | CAL-PACIFIC LUMBER COMPANY - HOOPA | 12240010 | STATE RESPONSE | CERTIFIED | HWY 96 | HOOPA | 9554 |
| [REPORT] | [MAP] | CAPETOWN GFA Z-33A | 80000517 | MILITARY EVALUATION | NO FURTHER ACTION | | CAPETOWN | |
| [REPORT] | [MAP] | CELTOR CHEMICAL WORKS | 12280002 | FEDERAL SUPERFUND - DELISTED | CERTIFIED | BTW NORTON FLD & TRINITY RIVER | HOOPA | 9554 |
| [REPORT] | [MAP] | CENTERVILLE BEACH NAVAL FACILITY | 12360001 | STATE RESPONSE | CERTIFIED | 5 MILES WEST OF FERNDALE, CA | FERNDALE | 9533 |
| [REPORT] | [MAP] | COLLEGE OF THE REDWOODS RANGE COMPLEX | 60001912 | EVALUATION | INACTIVE - ACTION REQUIRED | 7351 TOMPKINS HILL ROAD | EUREKA | 9550 |
| [REPORT] | [MAP] | COPPER BLUFF MINE (BOLIVAR MINE) | 60002830 | FEDERAL SUPERFUND - LISTED | REFER: EPA | OFF HWY 96 IN NORTON FLD | HOOPA | 9554 |
| [REPORT] | [MAP] | CUMMINGS ROAD LANDFILL | 12490007 | EVALUATION | REFER: OTHER AGENCY | END OF CUMMINGS ROAD | EUREKA | 9550 |
| [REPORT] | [MAP] | EEL RIVER SAWMILLS, MILL A | 12240119 | STATE RESPONSE | ACTIVE | 1053 NORTHWESTERN AVE | FORTUNA | 9554 |
| [REPORT] | | EUREKA COMMUNITY HEALTH CENTER | 60002940 | CALMORTGAGE | NO ACTION REQUIRED | 2200 & 2189 TYDD STREET | EUREKA | 9550 |

| | | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|---|
| [REPORT] | [MAP] | EUREKA EDUCATIONAL RESOURCE CENTER | 60000101 | SCHOOL CLEANUP | CERTIFIED | 1808 SIXTH STREET | EUREKA | 9550 |
| [REPORT] | [MAP] | EUREKA HIGH SCHOOL NEW GYMNASIUM | 60002844 | SCHOOL EVALUATION | NO ACTION REQUIRED | 1915 J STREET | EUREKA | 9550 |
| [REPORT] | | EUREKA OIL AND BURNER | 12420003 | HISTORICAL | REFER: RWQCB | FOOT OF T STREET | EUREKA | 9550 |
| [REPORT] | [MAP] | FORMER EEL RIVER SAWMILL | 60003070 | VOLUNTARY CLEANUP | CERTIFIED O&M - LAND USE RESTRICTIONS ONLY - LAND USE RESTRICTIONS | 775 NORTHWESTERN AVENUE | RIO DELL | 9556 |
| [REPORT] | [MAP] | FORMER HUMBOLDT BAY BOMBING TARGET - (J09CA7471) | 60001494 | MILITARY EVALUATION | NO FURTHER ACTION | 3 MILES SOUTHWEST OF EUREKA | EUREKA | 9550 |
| [REPORT] | [MAP] | FORMER ROGER'S GARAGE | 60000042 | VOLUNTARY CLEANUP | INACTIVE - NEEDS EVALUATION | 1622 OLD ARCATA ROAD | ARCATA | 9552 |
| [REPORT] | | FORTUNA COMMUNITY HEALTH CENTER | 60002942 | CALMORTGAGE | NO ACTION REQUIRED | 3750 ROHNERVILLE ROAD | FORTUNA | 9554 |
| [REPORT] | [MAP] | G&R METAL | 12750001 | EVALUATION | REFER: RWQCB | 132 W. FIRST STREET | EUREKA | 9550 |
| [REPORT] | | GEORGIA PACIFIC CORPORATION #5 | 12240110 | HISTORICAL | REFER: RWQCB | BIG LAGOON | MCKINLEYVILLE | 9552 |
| [REPORT] | [MAP] | GZC | 60002917 | VOLUNTARY CLEANUP | INACTIVE - ACTION REQUIRED | 1678 GLENDALE DRIVE | MCKINLEYVILLE | 9551 |
| [REPORT] | [MAP] | HALVORSON MILLS | 12240121 | EVALUATION | REFER: RWQCB | 1415 WATERFRONT DRIVE | EUREKA | 9550 |
| [REPORT] | [MAP] | HOOPA VENEER | 12240038 | STATE RESPONSE | CERTIFIED | HWY 96 | HOOPA | 9554 |
| [REPORT] | [MAP] | HUMBOLDT COUNTY AIRPORT | 71000036 | MILITARY EVALUATION | REFER: RWQCB | HIGHWAY 101 | MCKINLEYVILLE | 9552 |
| [REPORT] | [MAP] | HUMBOLDT PACIFIC TRANSPORT | 60000411 | EVALUATION | REFER: RWQCB | 1403 EELOA AVENUE | RIO DELL | 9556 |
| [REPORT] | [MAP] | HUMBOLDT PACIFIC TRANSPORTATION INC | 12470001 | EVALUATION | INACTIVE - NEEDS EVALUATION | 1404 EEOLA AVENUE | RIO DELL | 9556 |
| [REPORT] | [MAP] | JACOBY CREEK ELEMENTARY SCHOOL EXPANSION | 60002847 | SCHOOL EVALUATION | NO ACTION REQUIRED | 1617 OLD ARCATA ROAD | BAYSIDE | 9552 |
| [REPORT] | [MAP] | MAXIM GAS COMPANY OF EUREKA | 12490004 | EVALUATION | INACTIVE - NEEDS EVALUATION | 210 H STREET /622 SECOND STREET | EUREKA | 9550 |
| [REPORT] | [MAP] | MCINTOSH LUMBER COMPANY, INC | 12240045 | EVALUATION | NO ACTION REQUIRED | 501 HATCHERY ROAD | BLUE LAKE | 9552 |

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| | | SITE / FACILITY NAME | ESTOR / EPA ID | PROGRAM TYPE | STATUS | ADDRESS DESCRIPTION | CITY | ZIP |
|---|---|---|---|---|---|---|---|---|
| [REPORT] | [MAP] | MCNAMARA AND PEEPE LUMBER MILL | 12240115 | STATE RESPONSE | ACTIVE - LAND USE RESTRICTIONS | 1619 GLENDALE DRIVE | ARCATA | 9552 |
| [REPORT] | [MAP] | MCNORD LUMBER CO | 12240047 | VOLUNTARY CLEANUP | ACTIVE | 1610 GLENDALE DRIVE | MCKINLEYVILLE | 9551 |
| [REPORT] | | MORRISON & JACKSON LUMBER COMPANY | 12240053 | HISTORICAL | REFER: RWQCB | HIGHWAY 101 | MYERS FLAT | 9555 |
| [REPORT] | [MAP] | MOUNT PIERCE RADIO RELAY ANNEX (J09CA0878) | 80000558 | STATE RESPONSE | NO FURTHER ACTION | 5 MILES SOUTHWEST OF SCOTIA, CA, ON MONUMNET ROAD | SCOTIA | 955X |
| [REPORT] | [MAP] | MOZZETTI LANDFILL | 12240120 | VOLUNTARY CLEANUP | NO ACTION REQUIRED | 1053 NORTHWESTERN AVE | FORTUNA | 9554 |
| [REPORT] | [MAP] | NAAS ARCATA-BOMBING RNG (J09CA0061) | 80000043 | MILITARY EVALUATION | NO FURTHER ACTION | | ARCATA | |
| [REPORT] | [MAP] | NAVAL AUXILIARY AIR STATION, ARCATA (J09CA0799) | 80000564 | STATE RESPONSE | REFER: RWQCB | 0.67 MI NE OF HAMMOND TRUCK ROAD AND QUARRY ROAD | MCKINLEYVILLE | 9557 |
| [REPORT] | | NWP RAILROAD YARD | 12400001 | HISTORICAL | REFER: RWQCB | BROADWAY AND THIRD STREET | EUREKA | 9550 |
| [REPORT] | [MAP] | PACIFIC GAS & ELECTRIC/ HUMBOLDT BAY POWER PLANT | CAT080011562 | HAZ WASTE - RCRA | CLOSED | 1000 KING SALMON AVE | EUREKA | 9550 |
| [REPORT] | [MAP] | PACIFIC GAS & ELECTRIC/ HUMBOLDT BAY POWER PLANT | 80001831 | VOLUNTARY CLEANUP | CERTIFIED O&M - LAND USE RESTRICTIONS ONLY - LAND USE RESTRICTIONS | 1000 KING SALMON AVE | EUREKA | 9550 |
| [REPORT] | [MAP] | PG&E EUREKA 1 | 12490001 | STATE RESPONSE | REFER: RWQCB | RAILROAD STREET AND GENEVA | EUREKA | 9550 |
| [REPORT] | [MAP] | PG&E EUREKA 2 | 12490003 | EVALUATION | INACTIVE - NEEDS EVALUATION | H/I/FIRST/2ND/ STREETS | EUREKA | 9550 |
| [REPORT] | | R. E. DAVENPORT | 12760001 | HISTORICAL | REFER: RWQCB | 34 W. WATERFRONT | EUREKA | 9550 |
| [REPORT] | [MAP] | REDWOOD ACRES | 12070002 | VOLUNTARY CLEANUP | REFER: RWQCB | 3750 HARRIS STREET | EUREKA | 9550 |
| [REPORT] | [MAP] | SCHMIDBAUER LUMBER INC | 12240068 | VOLUNTARY CLEANUP | REFER: RWQCB | FT OF CLARK | EUREKA | 9550 |
| [REPORT] | [MAP] | SCOTIA GYMNASIUM FACILITY | 60003091 | SCHOOL EVALUATION | NO ACTION REQUIRED | 230 MILL STREET | SCOTIA | 9556 |
| [REPORT] | [MAP] | SCOTIA RECREATION CENTER | 60000649 | SCHOOL EVALUATION | NO ACTION REQUIRED | SOUTHERN END OF MILL STREET | SCOTIA | 9556 |

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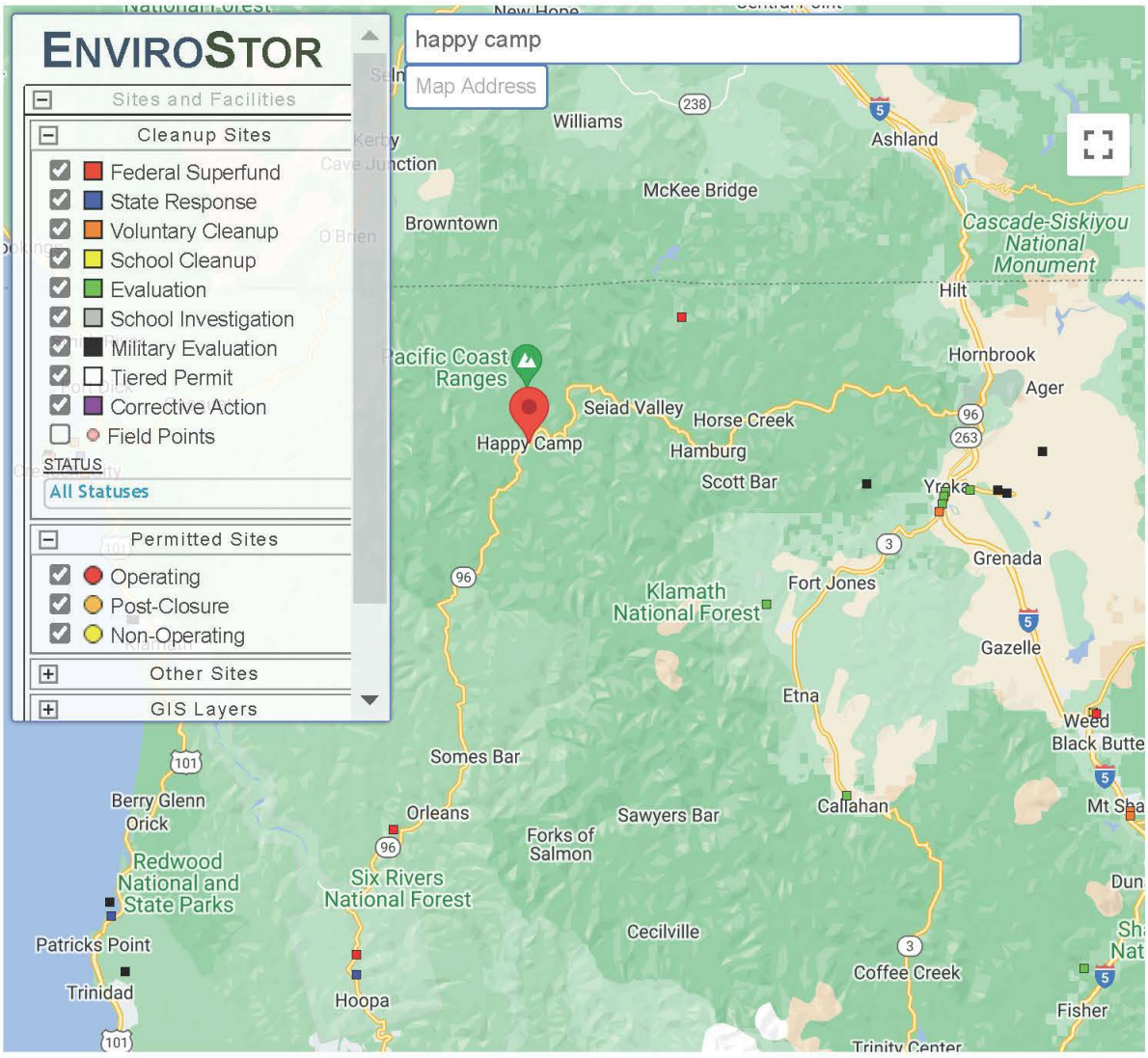


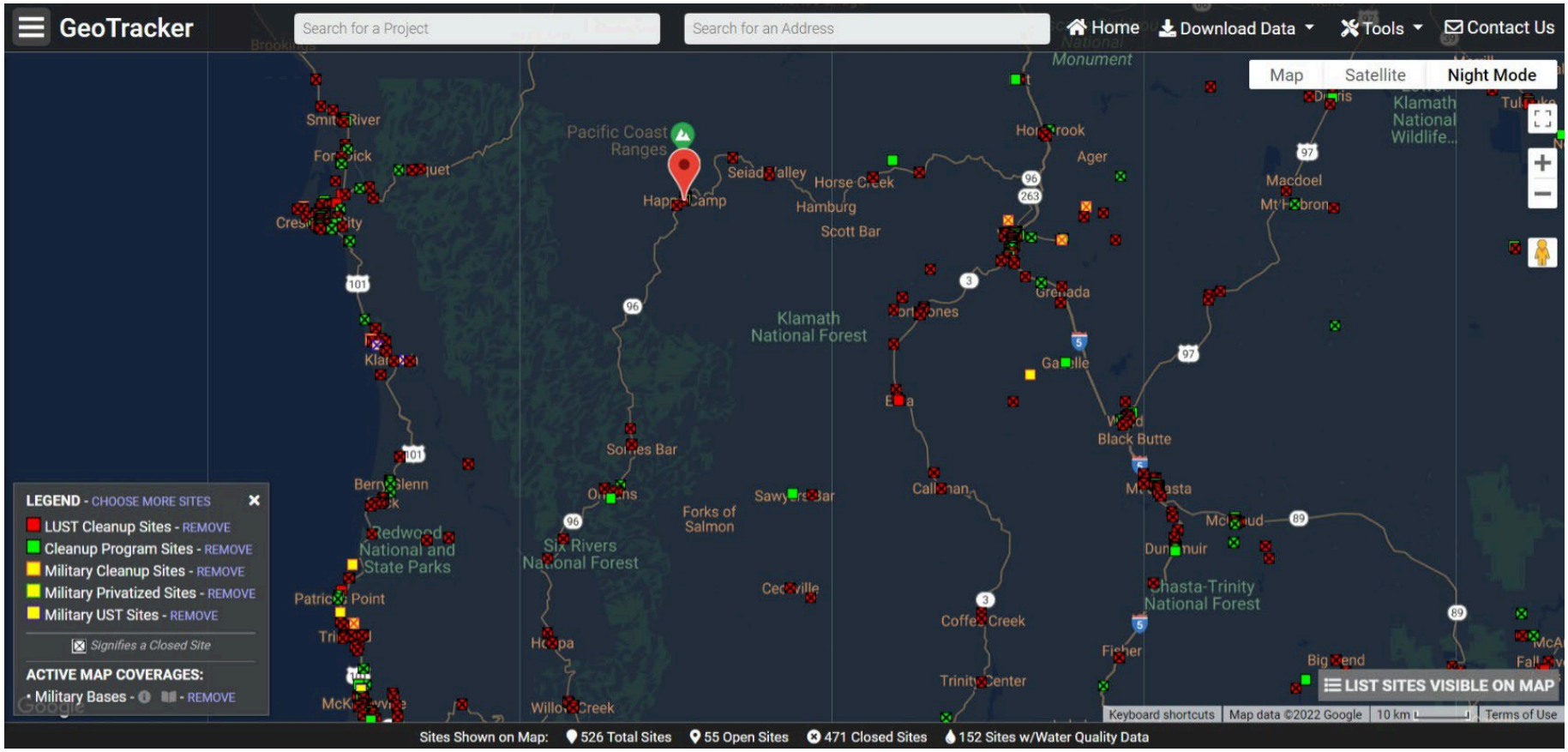

SITES CURRENTLY VISIBLE ON MAP 40 SITES LISTED EXPORT THIS LIST TO EXCEL

| PROJECT NAME | STATUS | PROJECT TYPE | ADDRESS | CITY |
|---|---|---|---|---|
| ABANDONED ASBESTOS MINE | REFER: OTHER AGENCY | EVALUATION | TOWNSHIP 37 N RANGE 5 W SECTIONS 2 & 12 | SHASTA COUNTY |
| AMERICAN FABRIC CARE | INACTIVE - NEEDS EVALUATION | EVALUATION | 490 SOUTH BROADWAY | YREKA |
| BIG LAGOON BOMBING TARGET (IND RESERV) (J09CA0064) | NO FURTHER ACTION | STATE RESPONSE | | BIG LAGOON |
| BIG LAGOON TARGET RANGE | NO FURTHER ACTION | MILITARY EVALUATION | | BIG LAGOON |
| BLUE LEDGE MINE | ACTIVE | FEDERAL SUPERFUND | 2 MILES SOUTH OF OREGON ON ROAD 1060 | ROGUE RIVER NATIONAL FOREST |
| [illegible] | [illegible] | [illegible] | BTW NORTON FLD & TRINITY | [illegible] |

https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=happy+camp 1/1

SITES IDENTIFIED WITH WASTE CONSTITUENTS ABOVE HAZARDOUS WASTE LEVELS OUTSIDE THE WASTE MANAGEMENT UNIT

| COUNTY | CITY | REGION | SWAT | WASTE DISCHARGER SYSTEM NO. | SOLID WASTE ID NO. | WASTE MANAGEMENT UNIT NAME | FACILITY NAME | AGENCY NAME |
|---|---|---|---|---|---|---|---|---|
| DEL NORTE | CRESCENT CITY | 1 | 2 | 1A880520NSL-01 | | DEL NORTE COUNTY- PESTICIDE STORAGE | DEL NORTE PESTICIDE STORAGE AR | DEL NORTE, COUNTY OF |
| CONTRA COSTA | PITTSBURG | 2 | 1 | 2 071059002-02 | 07-A1-0001 | U.S. STEEL CORP.-PITTSBURG SITE LA | WDR-USS-POSCO | USS-POSCO |
| SOLANO | VALLEJO | 2 | 1 | 2 482011003-01 | 48-AA-0008 | US NAVY MARE ISLAND SANITARY LANDFILL | WDR-NAVAL SHIPYARD/CLASS I LAN | MARE ISLAND NAVAL SHIPYARD |
| CONTRA COSTA | RICHMOND | 2 | 3 | 2 071007002-01 | | CHEVRON CHEMICAL COMPANY-OLD SITES | WDR-ORTHO DIV-RICHMOND PLANT | CHEVRON CHEMICAL COMPANY |
| MONTEREY | FORT ORD (Marina) | 3 | 1 | 3 270301004-01 | 27-AA-0015 | FORT ORD LANDFILL | SANITARY LANDFILL | U.S. ARMY, FORT ORD |
| SANTA BARBARA | LOMPOC | 3 | 3 | 3 420305001-01 | 42-AA-0017 | LOMPOC CITY LANDFILL | SOLID WASTE DISPOSAL SITE | LOMPOC CITY |
| LOS ANGELES | MONTEREY PARK | 4 | 1 | 4B190332001-01 | 19-AM-0001 | OPERATING INDUSTRIES LANDFILL | OPERATING INDUSTRIES, INC. | OPERATING INDUSTRIES, INC. |
| TULARE | WOODLAKE | 5F | 1 | 5D540300010-01 | 54-AA-0007 | TULARE COUNTY-WOODLAKE LANDFILL | WOODLAKE SWDS | TULARE, COUNTY OF |
| FRESNO | FRESNO | 5F | 2 | 5D100300001-01 | | MCKINLEY AVE. YARD | T.H. AGRICULTURE AND NUTRITION | NORTH AMERICAN PHILLIPS |
| KINGS | CORCORAN | 5F | 2 | 5D160302001-01 | 16-AA-0011 | KINGS COUNTY-CORCORAN LANDFILL | CORCORAN SWDS | KINGS COUNTY WASTE MGMT AUTH. |
| FRESNO | FRESNO | 5F | 3 | 5D100319001-01 | 10-AA-0013 | ORANGE AVENUE DISPOSAL COMPANY | ORANGE AVENUE LANDFILL | ORANGE AVENUE DISP CO. INC |
| TULARE | EXETER | 5F | 3 | 5D540300003-01 | 54-AA-0002 | TULARE COUNTY-EXETER DISPOSAL SITE | EXETER SWDS | TULARE, COUNTY OF |
| MERCED | ATWATER | 5F | 4 | 5C240115001-01 | | ATWATER CITY | BERT CRANE ROAD LANDFILL | ATWATER, CITY OF |
| FRESNO | FOWLER | 5F | 5 | 5D100325N01-01 | | FOWLER CITY | FOWLER CITY LANDFILL (OLD) | FOWLER, CITY OF |
| BUTTE | OROVILLE | 5R | 2 | 5A042005001-01 | | KOPPERS COMPANY-OROVILLE SITE | KOPPERS WOOD PRESERVING ISW | KOPPERS INDUSTRIES INC. |
| BUTTE | CHICO | 5R | 4 | 5A040302N01-01 | | CHICO CITY BURN DUMP | HUMBOLDT ROAD LANDFILL | CHICO, CITY OF |
| SACRAMENTO | SACRAMENTO | 5S | 1 | 5A340700003-01 | 34-AA-0008 | US AIR FORCE-MCCLELLAN AFB LANDFILL | CLASS III SITE 8 (CLOSURE) | US AIR FORCE-MCCLELLAN AFB |
| SACRAMENTO | MATHER (Rancho Cordova) | 5S | 2 | 5A340700001-01 | | US AIR FORCE-MATHER FIELD LANDFILL | MATHER AFB ENVIRONMENTAL MGMT | US AIR FORCE – MATHER AFB |
| SACRAMENTO | SACRAMENTO | 5S | 3 | 5B342000N01-01 | | SACRAMENTO ARMY DEPOT | SACRAMENTO ARMY DEPOT | U.S. ARMY |
| SAN JOAQUIN | STOCKTON | 5S | 3 | 5 390002NUR-01 | 39-AA-0006 | US NAVY COMMUNICATIONS LANDFILL | U.S.N. COMMUNICATION STA. LANDF | U.S. NAVY COMMUNICATIONS |
| SAN JOAQUIN | FRENCH CAMP | 5S | 3 | 5 390003NUR-01 | | US ARMY-SHARPE ARMY DEPOT | US ARMY-SHARPE ARMY DEPOT | US ARMY |
| SAN JOAQUIN | TRACY | 5S | 5 | 5 390006NUR-01 | | SITE 300 (OTHER 39 WMUS) | LAWRENCE LIVERMORE LAB | LAWRENCE LIVERMORE LABS |
| INYO | KEELER | 6V | 1 | 6B142000041-01 | 14-AA-0008 | US TUNGSTEN OWENS LAKE LANDFILL | OWENS LAKE LANDFILL | UMETCO MINERALS CORPORATION |
| ORANGE | FULLERTON | 8 | 1 | 8300002NUR-01 | | MCCOLL SITE | MCCOLL SLUDGE DISPOSAL SITE | TOXIC SUBSTANCES CONTROL DIVIS |
| RIVERSIDE | RIVERSIDE | 8 | 1 | 8 330325001-01 | | STRINGFELLOW QUARRY ACID PITS | STATE OF CALIFORNIA-STRINGFELLOW | TOXIC PROGRAM MANAGEMENT SECT |



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