



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Region 1 – Northern
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



June 28, 2018

Ted McArthur, District Ranger
ATTN: Maija Meneks/Chris Ester
11263 N. State Hwy 3
Fort Jones, CA 96032

Subject: Review of the Early Scoping for the Proposed East Fork Scott Project, County

Dear Mr. McArthur:

The California Department of Fish and Wildlife (Department) has reviewed the early scoping documentation dated May 30, 2018, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat. The Department offers the following comments and recommendations on this Project in our role as a trustee agency pursuant to the California Environmental Quality Act, California Public Resources Code §21000 et seq. The Department appreciates the opportunity to comment on this Project. The following are informal comments intended to assist the Lead Agency in making informed decisions early in the Project development and review process.

Project Description

The Project as proposed is to *"improve forest health and resilience in early and mid/late seral habitat; enhance meadow and oak woodland habitat for sensitive plant and large game species; protect and enhance riparian habitat and stream shade; reduce sediment input from roads and abandoned mines; and provide for firefighter and public safety."*

Comments and Recommendations

The Department is supportive of this Project and has the following comments and recommendations.

CNDDDB Query

A cursory query of the California Natural Diversity Database (CNDDDB) identified multiple special-status species within a 10-mile radius of the Project site. These include, but are not limited to the following:

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- Cascades frog (*Rana cascadae*)-Candidate for State Endangered
- Foothill yellow-legged frog (*Rana boylei*)-Candidate for State Threatened
- Northern goshawk (*Accipiter gentilis*) California Species of Special Concern
- Western pond turtle (*Emys marmorata*) – California Species of Special Concern
- Southern long-toed salamander (*Ambystoma macrodactylum sigillatum*)
California Species of Special Concern
- Pacific tailed frog (*Ascaphus truei*) California Species of Special Concern
- Jepson's horkelia (*Horkelia daucifolia* var. *indicta*) – Rare Plant Rank 1B.1
- Yreka phlox (*Phlox hirsuta*) – State Endangered, Federally Endangered, Rare Plant Rank 1B.2
- Woolly balsamroot (*Balsamorhiza lanata*) – Rare Plant Rank 1B.2
- Scott Valley phacelia (*Phacelia greenei*) – Rare Plant Rank 1B.2
- Pickering's ivesia (*Ivesia pickeringii*) – Rare Plant Rank 1B.2
- Scott Mountain bedstraw (*Galium sperpentium* ssp. *scotticum*)- Rare Plant Rank 1B.2
- Showy raillardella (*Raillardella pringlei*) – Rare Plant Rank 1B.2
- Oregon fireweed (*Epilobium oreganum*) – Rare Plant Rank 1B.2
- Klamath manzanita (*Arctostaphylos klamathensis*) – Rare Plant Rank 1B.2
- Mt. Shasta sky pilot (*Polemonium pulcherrimum* var. *shastense*) Rare Plant Rank 1B.2
- Trinity buckwheat (*Eriogonum alpinum*) – Rare Plant Rank 1B.2
- Mt. Eddy sky pilot (*Polemonium eddyense*) – Rare Plant Rank 1B.2
- Siskiyou fireweed (*Epilobium siskiyouense*) - Rare Plant Rank 1B.3
- Scott Mountain sandwort (*Sabulina stolonifera*) – Rare Plant Rank 1B.3
- Golden alpine draba (*Draba aureola*) – Rare Plant Rank 1B.3
- Mt. Eddy draba (*Draba carnosula*) – Rare Plant Rank 1B.3
- Silky balsamroot (*Balsamorhiza sericea*) – Rare Plant Rank 1B.3
- Shasta chaenactis (*Chaenactis suffrutescens*) – Rare Plant Rank 1B.3
- Siskiyou phacelia (*Phacelia leonis*) – Rare Plant Rank 1B.3
- Crested potentilla (*Potentilla cristae*) – Rare Plant Rank 1B.3
- Scott Mountains fawn lily (*Erythronium citrinum* var. *roderickii*) – Rare Plant Rank 1B.3
- Holzinger's orthotrichum moss (*Orthotrichum holzingeri*) – Rare Plant Rank 1B.3
- Pink-margined monkeyflower (*Erythranthe trinitensis*) – Rare Plant Rank 1B.3
- Canadian buffalo-berry (*Shepherdia canadensis*) – Rare Plant Rank 2B.1
- Western goblin (*Botrychium montanum*) – Rare Plant Rank 2B.1
- Cascade grass-of-Parnassus (*Parnassia cirrata* var. *intermedia*)– Rare Plant Rank 2B.2
- Alkali hymenoxys (*Hymenoxys lemmonii*) – Rare Plant Rank 2B.2
- Mingan moonwort (*Botrychium miganese*) – Rare Plant Rank 2B.2
- Peck's lomatium (*Lomatium peckianum*) - Rare Plant Rank 2B.2
- Little-leaved huckleberry (*Vaccinium scoparium*) – Rare Plant Rank 2B.2
- Blue alpine phacelia (*Phacelia sericea* var. *ciliata*) - Rare Plant Rank 2B.3
- Cascade alpine campion (*Silene suksdorfii*) - Rare Plant Rank 2B.3

- Oregon sedge (*Carex halliana*) - Rare Plant Rank 2B.3
- Green yellow sedge (*Carex viridula* ssp. *viridula*) – Rare Plant Rank 2B.3
- Yellow willowherb (*Epilobium luteum*) – Rare Plant Rank 2B.3
- Little hulsea (*Hulsea nana*) – Rare Plant Rank 2B.3
- Subalpine aster (*Eurybia merita*) – Rare Plant Rank 2B.3
- Dudley's rush (*Juncus dudleyi*) - Rare Plant Rank 2B.3
- Cascade stonecrop (*Sedum divergens*) - Rare Plant Rank 2B.3
- Waldo daisy (*Erigeron bloomer* var. *nudatus*) – Rare Plant Rank 2B.3
- California pitcherplant (*Darlingtonia californica*) – Rare Plant Rank 4.2
- Scott Mountain howellanthus (*Howellanthus dalesianus*) – Rare Plant Rank 4.3

This list should not be considered comprehensive as additional special-status plant and animal species may occur within the Project vicinity. The Department recommends that if potential habitat exists for any of the special status species, surveys be conducted prior to implementation of the Project. If special status species are found, avoidance and minimization measures should be developed.

Specific Recommendations

The Department concurs that large woody debris within streams does provide benefits for aquatic species; however, special consideration is warranted to ensure habitat for Cascades frog and foothill yellow-legged frog persists. The Department recommends surveying, if there is appropriate habitat for either species, prior to placing the large woody debris in the stream.

Under "Abandoned Mineland Reclamation" there is no discussion on potential habitat for bats in the mines. The Department recommends conducting focused bat surveys to determine bat activity prior to permanently blocking any of the mine openings.

If you have any questions, please contact me at (530) 225-2779, or by email at Amy.Henderson@wildlife.ca.gov.

Sincerely,



Amy Henderson
Environmental Scientist