



State of California  
 The Natural Resources Agency  
 California Department of Forestry and Fire Protection (CAL FIRE)

**NOTICE OF EXEMPTION**

2019058111

<b>PROJECT TITLE</b>	China Creek Training Project		
<b>PROJECT LOCATION</b>	Centerville Park – Smith Rd. x Rainbow Route, Centerville, CA Legal Description: Sections 7 & 8; T. 14S, R. 23E; MDB&M Approx. 3 air-miles East of Sanger, CA	<b>COUNTY</b>	Fresno
<b>LEAD AGENCY</b>	California Department of Forestry and Fire Protection (CAL FIRE)		
<b>CONTACT</b>	Ryan Wimmer, Unit CEQA Coordinator		
<b>ADDRESS</b>	CAL FIRE Fresno-Kings Unit Headquarters 210 S. Academy Ave., Sanger, CA 93657	<b>PHONE</b>	(559) 493-4300

**PROJECT DESCRIPTION**

The California Department of Forestry and Fire Protection (“CAL FIRE”, “Department”) is proposing training burns on 48 acres of foothill grass and oak habitat at China Creek Park. The park is managed by the County of Fresno and is open to public use. The purpose of the project is to provide opportunities for local fire service agencies to train with live fire use in a controlled environment. Ancillary benefits of the project include fuels modification, range and wildlife habitat improvement. Burn areas are bounded by existing service roads and foot trails. If additional fire control features are deemed necessary, line creation activities will be monitored by a CAL FIRE archaeologist or their supervised designee. Routine fire control training activities may include mobile attack, hand tool use, and progressive hose lay installation. Lighting will be conducted with hand ignition devices. All burning will be performed in accordance with terms and conditions of a burn permit issued by the San Joaquin Valley Air Pollution Control District. The Department has been tasked with increasing acres of land treated and this training burn will be another step toward achieving that goal. Annual refresher training is expected to occur if site monitoring indicates satisfactory burning conditions are likely to result in habitat improvement.

**EXEMPTION STATUS**

- Categorical Exemption Type/Section: Class 4, §15304 (e): Minor Alterations to Land
- Statutory Exemption (state code section):
- Ministerial (§21080(b)(1); 15268)
- Declared Emergency (§21080(b)(3); 15269(a))
- Emergency Project (§21080(b)(4); 15269(b)(c))

**REASONS PROJECT IS EXEMPT**

This project fits within the above-listed Categorical Exemption, Declared Emergency, and Emergency Project listed in the CEQA Guidelines. The project meets the requirements of Class 4, §15304(e): Minor Alteration to the Land Categorical Exemption to CEQA. “Class 4” includes minor public or private alterations in the conditions of land, water, and/or vegetation which do not involve removal of healthy, mature, and scenic trees except for forestry and agricultural purposes. Field review by CAL FIRE staff confirmed that no § 15300.2 Exceptions apply which would preclude the use of a Notice of Exemption for this project. CAL FIRE staff has concluded that no significant environmental impact would occur to aesthetics, agriculture and forestland/timberland, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, or utilities and service systems. Documentation of the environmental review completed by the Department is kept on file at CAL FIRE Fresno-Kings Unit Headquarters at 210 South Academy Avenue, Sanger, CA 93657.

**DATE RECEIVED FOR FILING**

Governor's Office of Planning & Research  
 MAY 07 2019  
 STATE CLEARINGHOUSE

FOR   
 Helge Eng, Deputy Director Date 5/7/19  
 California Department of Forestry and Fire Protection



## California Department of Forestry and Fire Protection Environmental Review Report for an Exempt Project

**Note:** This report form is intended for use by California Department of Forestry and Fire Protection (CAL FIRE) staff to document a limited environmental impact analysis supporting the filing of a Notice of Exemption (NOE) document for a proposed CAL FIRE project. Although the project appears to fit within the descriptions for allowable Categorical Exemptions, this report presents CAL FIRE's review for possible "Exceptions" that would preclude finding the project to be categorically exempt as discussed in CEQA Guidelines Section 15300.2. This report will be filed with the CEQA administrative record for this project to document the environmental impact analysis conducted by the Department.

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<b>Title:</b>	Forester I
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<b>Project Name:</b>	China Creek Training Exercise
<b>Project Number:</b>	TBA
<b>Program Type:</b>	Training/Pre-Fire
<b>CAL FIRE Unit:</b>	Fresno-Kings
<b>County:</b>	Fresno
<b>Acres:</b>	48
<b>Legal Location:</b>	Sections 7 & 8; T14S, R23E; MDB&M
<b>Name of USGS 7.5' Quad Map(s):</b>	Sanger, CA; Wahtoke, CA.
<input type="checkbox"/> Project Vicinity Map Attached <input checked="" type="checkbox"/> Project Location Map Attached <input checked="" type="checkbox"/> Photos Attached	

<b>Other Public Agency Review/Permit Required:</b>		
Would the project result in:	<b>YES</b>	<b>NO</b>
Alterations to a watercourse (DFG - Lake and Stream Alteration Agreement)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Conversion of timberland (CAL FIRE - Conversion Permit or Exemption)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Demolition (Local Air District - Demolition Permit)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Soil disturbance over 1 acre (RWQCB - SWPPP)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fill of possible wetlands (404 Permit - USACE)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Project Description and Environmental Setting (Describe the project activities, project site and its surroundings, its location, and the environmental setting):**

The California Department of Forestry and Fire Protection ("CAL FIRE", "Department") is proposing training burns on 48 acres of foothill grass and oak habitat at China Creek Park. The park is managed by the County of Fresno and is open to public use. The purpose of the project is to provide opportunities for local fire service agencies to train with live fire use in a controlled environment. Ancillary benefits of the project include fuels modification, range and wildlife habitat improvement. Burn areas are bounded by existing service roads and foot trails. If additional fire control features are deemed necessary, line creation activities will be monitored by a CAL FIRE archaeologist or their supervised designee. Routine fire control training activities would include mobile attack, hand tool use, and progressive hose lay operations. Lighting will be conducted with hand ignition devices. All burning will be performed in accordance with terms and conditions of a burn permit issued by the San Joaquin Valley Air Pollution Control District. The Department has been tasked with increasing acres of land treated and this training burn will be another step toward achieving that goal. Annual refresher training is expected to occur if site monitoring indicates satisfactory burning conditions are likely to result in habitat improvement.

The project is located in the community of Centerville, CA, approximately 3 air-miles East of Sanger, CA. The project will occur on lands owned and managed by the County of Fresno. This area is known by locals as the "Centerville Park", though the County refers to it as "China Creek Park". The project area is characterized by flat terrain that is open and covered with light amounts of chaparral and shrub species. The grass component is noted to be quite abundant comprised mainly of non-native species. There is evidence of decadent amounts of grass thatch that has accumulated over many years. Oak, sycamore and cottonwood occur throughout the area but concentrate near the two ponds and two watercourses that bound that project area. The property is currently managed for grazing allotments as well as public access. Recreational users often walk, fish, and observe the flora and fauna. An asphalt road accesses most of the project area and there is ample parking for emergency vehicles. The rest of the project area is bound by existing dirt service roads and walking trails. Minor improvement of these service roads may be necessary to maintain its' integrity before, during and after project activities. This will be accomplished with a light blade from a dozer or motor grader. Adjacent landowners range from 20-acre private parcels to a large industrial aggregate company owning hundreds of acres along the Kings River. The nearest smoke-sensitives communities would include Centerville and Sanger.

There has been much public support of the proposed activities. It is believed that annual burning will reduce fuel loading, including decadent amounts of grass, which will improve grazing opportunity and wildlife habitat. It is further believed that the project has the potential to extirpate occurrences of yellow starthistle (*Centaurea solstitialis*) and bolster native plant occurrences. The Sequoia Chapter of the CA Native Plant Society (CNPS) has been particularly helpful in the planning process for this project by assisting CAL FIRE with botanical surveys.

## Environmental Impact Analysis

### Aesthetics

- This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

The proposed project is in a rural area and will be visible from less-traveled public roadways. Within one season, the consumed annual grasses will grow back and the area will resume its natural, pre-treatment appearance resulting in no significant alteration to the existing view. No significant adverse aesthetic impacts are anticipated from this proposed project.

### Agriculture and Forest Resources

- This topic does not apply to this project and was not evaluated further.  
 Yes  No Would any trees be felled? If yes, discuss protection of nesting birds and compliance with FPRs.  
 Yes  No Would the project convert any prime or unique farmland?  
 Yes  No Would the project result in the conversion of forest land/timberland to non-forest use?

- This topic could apply to this project, and results of the assessment are provided below:

These areas do not meet the definition of timberland under the California Forest Practice Rules. No healthy, mature, and scenic trees will be removed unless they are hazardous to life and/or property. No impacts to Agriculture or Forest Resources are expected to result from this project.

### Air Quality

- This topic does not apply to this project and was not evaluated further.  
 Yes  No The local Air Quality Management District guidelines for dust abatement and other air quality concerns were reviewed for this project.  
 This topic could apply to this project, and results of the assessment are provided below:

All terms and conditions of a permit (or waiver) issued by the San Joaquin Valley Air Pollution Control District during project activities that involve the generation of particulate matter or gases (i.e. smoke, dust, CO<sub>2</sub>e, etc.). The project is in a rural area and impacts to smoke sensitive areas is not expected. FOFEM runs project 40lbs/ac PM 2.5 and 47lbs/ac PM 10. This project is not expected to result in significant adverse impacts to air quality.

### Biological Resources

- This topic does not apply to this project and was not evaluated further.  
 Yes  No Will the project potentially effect biological resources?  
 Yes  No Was a current CNDDDB review completed? Results discussed below:  
 Yes  No Was a biological survey of the project area completed? Results discussed below:  
 This topic could apply to this project, and results of the assessment are provided below:

On March 22, 2019, CAL FIRE queried the California Natural Diversity Database (CNDDDB) for all state or federal listed (or candidate thereof), or CDFW Species of Special Concern (SSC) and Fully Protected (FP), or California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, or 3 vascular plants recorded within and adjacent to the project area. The CNDDDB query included thirteen 7.5-minute quadrangles adjacent to the Sanger and Wahtoke 7.5' USGS quadrangles. See the attached biological survey report and attachments (Table 1 and Table 2) for complete information. CAL FIRE FKU Forester I Ryan Wimmer, along with CDFW Senior Environmental Scientist Margarita Gordus and CAL FIRE Environmental Scientist Liza Iegorova, have determined that significant adverse impacts to biological resources are not likely to occur as a result of this project.

### Cultural Resources

- This topic does not apply to this project and was not evaluated further.
- Yes  No Was a current archaeological records check completed? Results discussed below:
- Yes  No Was a CAL FIRE Staff or Contract Archaeologist consulted? Results discussed below:
- Yes  No Was an archaeological survey of the project area completed? Results discussed below:
- Yes  No Will the project effect any historic buildings or archaeological site?
- This topic could apply to this project, and results of the assessment are provided below:

A records check was conducted for the project (19-072) and found no previously recorded resources on or near the property. Native American notification letters were mailed with return receipts on March 5, 2019. Contact lists from the CAL FIRE Forest Practice Program and NAHC were utilized for contacts in Fresno County. A response was received from the California Native American Heritage Commission (NAHC) on March 13, 2019 stating that the project area corresponds to an area described within the Sacred Lands File (SLF). Per NAHC's instruction, CAL FIRE contacted Mr. David Alvarez, the tribal chairperson for the Traditional Choinumni Tribe. Mr. Alvarez was not aware of any specific sacred sites on the project area but stated that the area is a former use area for the Choinumni and that an encampment was once located in the vicinity. He expressed concern regarding the potential for resources to be disturbed during the proposed road grading. Therefore, Mr. Alvarez and Ms. Denise Ruzicka, CAL FIRE Associate State Archaeologist, determined that a monitor would be necessary should any heavy equipment be required for installation of fire control features. Mr. Alvarez stated that Ms. Ruzicka's education and experience as an archaeologist would satisfy this requirement. Ms. Ruzicka will be contacted so that she may be present to act as a monitor when heavy equipment use is necessary. Dakota Jeff of the Santa Rosa Rancheria e-mailed Ryan Wimmer on April 10, 2019 and requested that they be allowed to conduct surveys within the project area for cultural material before and after use of fire. Ryan Wimmer attempted to schedule an on-site visit with Mr. Jeff and Denise Ruzicka on May 1, 2019 via e-mail and telephone calls on April 18, 2019. No further responses were received from Native Americans as of April 24, 2019. Denise Ruzicka and Ryan Wimmer conducted an archaeological cursory survey on March 19, 2019 with negative findings for evidence of cultural resources. However, the ground surface visibility was extremely poor due to dense vegetation cover. Additional, more intense, cultural resource surveys are proposed to be conducted after project implementation when vegetative cover is reduced and ground visibility improves. If the proposed archaeological monitoring is conducted, no significant adverse impacts to cultural resources are expected to occur as a result of the proposed activities.

### Geology and Soils

- This topic does not apply to this project and was not evaluated further.
- This topic could apply to this project, and results of the assessment are provided below:

All of the project area occurs within an alluvium terrace soil type that is stable with no geologic concerns.

### Greenhouse Gas Emissions

- This topic does not apply to this project and was not evaluated further.
- Yes  No Would the project generate significant greenhouse gas (GHG) emissions?
- Yes  No Would these GHG emissions result in a significant impact on the environment? Discuss below:
- Yes  No Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Discuss below:

Minor temporary emissions will occur from travel to and from the training burn site and vegetation consumption. The Total amount of CO<sub>2</sub>e produced by each project entry is approximately **9 tons of CO<sub>2</sub>e**. Calculations suggest that the annual sequestration rate on-site will far surpass the emissions generated during project implementation. Therefore, no significant impacts resulting from Greenhouse Gas Emissions are anticipated because of this project.

### Hazards and Hazardous Materials

- This topic does not apply to this project and was not evaluated further.
- This topic could apply to this project, and results of the assessment are provided below:

The project will not create a significant hazard to the public or the environment related to hazardous materials, emergency evacuation, or wildfire risk. No adverse impacts from hazards or hazardous materials are anticipated.

### Hydrology and Water Quality

- This topic does not apply to this project and was not evaluated further.
- Yes  No Will the project potentially affect any watercourse or body of water?

This topic could apply to this project, and results of the assessment are provided below:

There are two Class I watercourses immediately adjacent to the project area, as well as two ponds. Heavy equipment will not be utilized within the standard width of a WLPZ protection buffer, except where an existing feature (e.g. service road) occurs within these zones. Equipment use within the standard width of a WLPZ will be limited to maintenance of existing facilities. The proposed project will not violate any water quality standards or waste discharge requirements. No impacts to water quality are anticipated.

**Land Use and Planning**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

The proposed project will not result in any changes in land use or zoning, will not divide an established community, and will not conflict with any habitat or natural community conservation plan. Burning is an established range management practice.

**Mineral Resources**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

**Noise**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

The project will involve noise from the chainsaws and engines. Most of project is far from any residences and work near residences is transient. Chainsaw use and engine noise is planned to be during normal business hours. No significant adverse impacts from noise will occur.

**Population and Housing**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

**Public Services**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

This project will improve fire protection in the area by increasing readiness and efficiency.

**Recreation**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

The property is owned and managed by the County of Fresno as a county park. It is open to the public and may be utilized for non-motorized purposes (walking, fishing, bird watching, etc.). There has been a positive response to the proposed activities by members of the public, CNPS, County employees, and Native Americans. Project activities will occur during times when recreational use is likely to be lowest (weekdays). Notifications will be posted at the main entrance gate to the park at least one week prior to proposed activities occurring. Less than significant impacts to recreation are expected.

**Transportation/Traffic**

This topic does not apply to this project and was not evaluated further.  
 This topic could apply to this project, and results of the assessment are provided below:

The amount of traffic generated will not conflict or exceed performance measures identified in applicable plans, ordinances or policies. The proposed project will not create any traffic design hazards. The main access gate is usually locked to prevent

civilian traffic from entering the park. Beyond this gate is a large paved area that will serve as a staging area for emergency vehicles participating in the training exercise. Doing so will not prevent the public from parking outside the park at the main entrance gate like normal. Therefore, the proposed project is not expected to have an impact on transportation and traffic.

**Utilities and Service Systems**

- This topic does not apply to this project and was not evaluated further.
- This topic could apply to this project, and results of the assessment are provided below:

No impacts to Utilities and Service Systems are expected.

**Changes Made to Avoid Environmental Impacts:**

No changes made to avoid environmental impacts.

**Mandatory Findings of Significance:**

	YES	NO
(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Justification for Use of a Categorical Exemption (discuss why the project is exempt, cite exemption number(s), and describe how the project fits the class):**

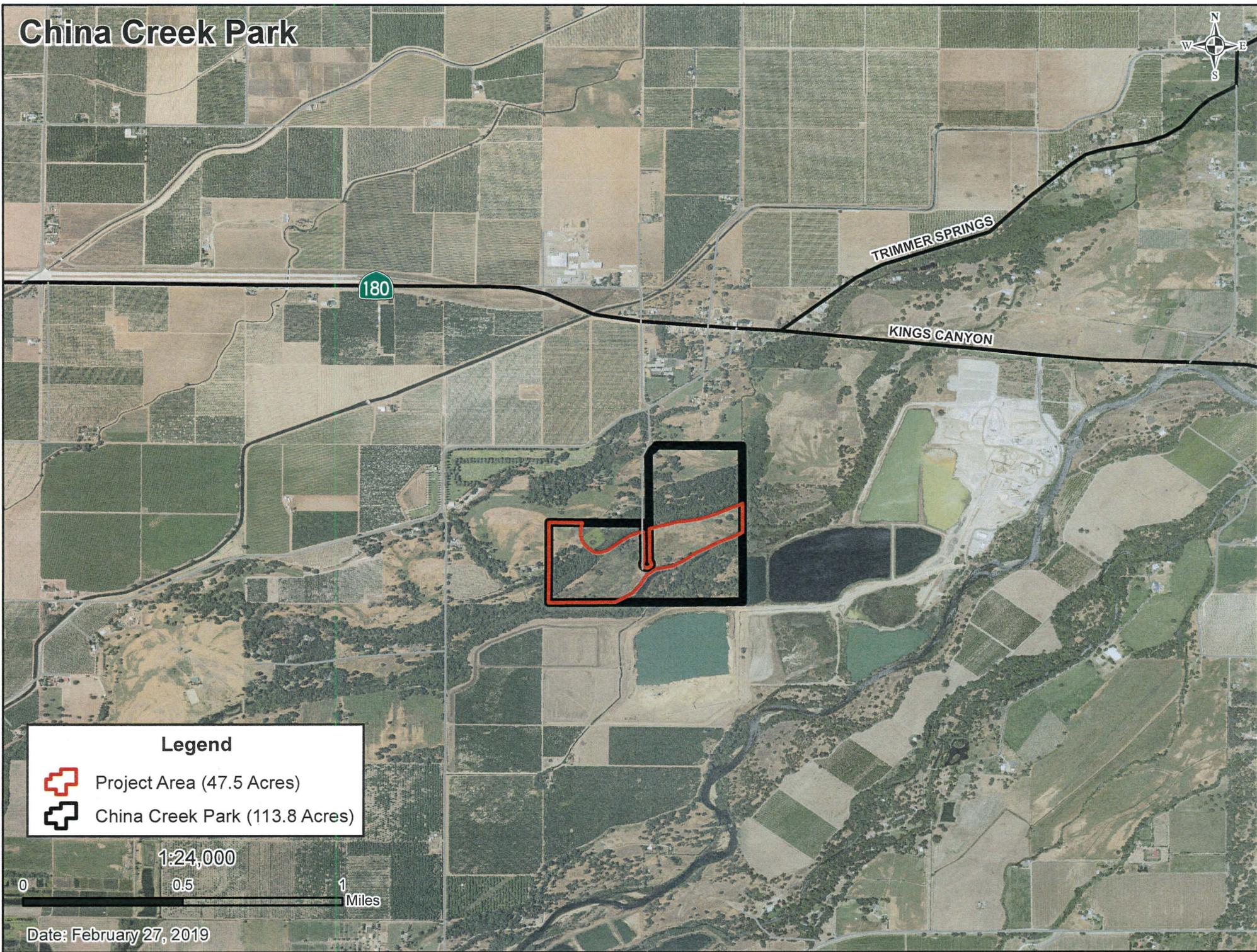
The proposed project is intended to provide training opportunities to hundreds of first responders. The project meets the requirements of Class 4, §15304(e): Minor Alteration to the Land Categorical Exemption to CEQA. Class 4 includes minor public or private alterations in the conditions of land, water, and/or vegetation which do not involve removal of healthy, mature, and scenic trees except for forestry and agricultural purposes. Field review by CAL FIRE staff confirmed that no 15300.2 Exceptions apply which would preclude the use of a Notice of Exemption for this project. CAL FIRE staff has concluded that no significant environmental impact would occur to aesthetics, agriculture and forestland/timberland, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, or utilities and service systems. Complete supporting documentation of the environmental review completed by the Department is kept on file at CAL FIRE Fresno-Kings Unit Headquarters at 210 South Academy Avenue, Sanger, CA 93657.

**Conclusion:**

After assessing potential environmental impacts and evaluating the description for the various classes of Categorical Exemptions to CEQA, CAL FIRE has determined that the project fits within one or more of the exemption classes and no exceptions exist at the project site which would preclude the use of this exemption. The Department considered the possibility of (a) sensitive location, (b) cumulative impact, (c) significant impact due to unusual circumstances, (d) impacts to scenic highways, (e) activities within a hazardous waste site, and (f) significant adverse change to the significance of a historical resource. A Notice of Exemption will be filed at the State Clearinghouse.

After assessing potential environmental impacts and evaluating the description for the various classes of Categorical Exemptions to CEQA, CAL FIRE has determined that the project does not fit within the description for the various exemption classes or has found that exceptions exist at the project site which precludes the use of a Categorical Exemption for this project. Additional environmental review will be conducted and the appropriate CEQA document used may be a Notice of Exemption or a Mitigated Notice of Exemption.

# China Creek Park



## Legend

-  Project Area (47.5 Acres)
-  China Creek Park (113.8 Acres)

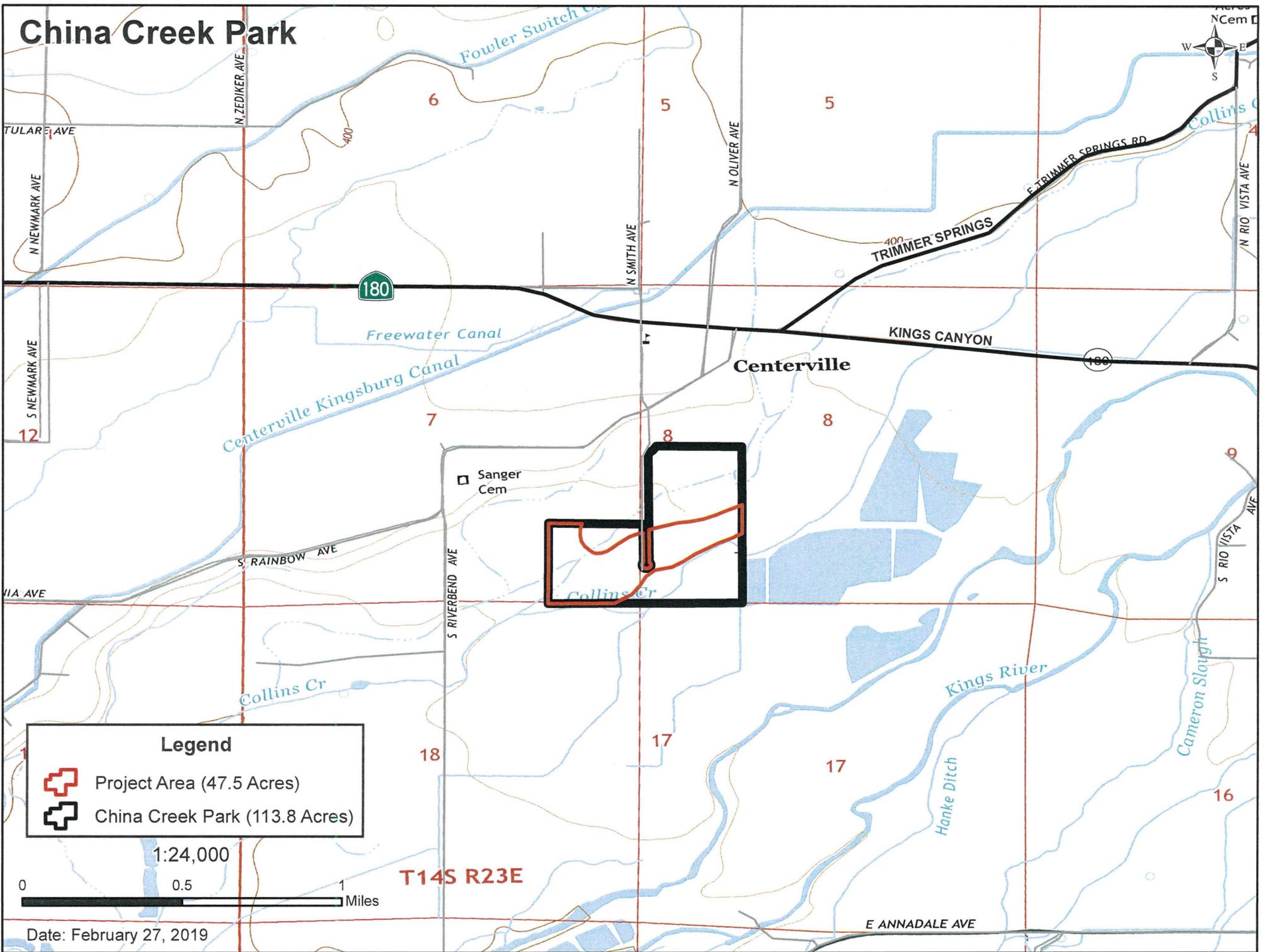
1:24,000



Date: February 27, 2019

2019058111

# China Creek Park



### Legend

-  Project Area (47.5 Acres)
-  China Creek Park (113.8 Acres)

1:24,000



T14S R23E

Date: February 27, 2019

## Biological Survey Report for the China Creek Training Project

Prepared by California Department of Forestry and Fire Protection Ryan Wimmer, Forester I

April 2019

The project area includes the "Centerville Park" located within Sections 7 and 8 of Township 14 South, Range 23 East, Mount Diablo Base and Meridian, in Sanger, Fresno County, California. The project area occurs within the "Sanger" and "Wahtoke" 7.5-minute quadrangles. Elevations in the project area range from approximately 350 feet above mean sea level and the aspect is generally South. The project is accessed from an unnamed asphalt road that departs Southbound from the intersection of South Smith Road and Rainbow Route.

### Scoping Methodology

On March 22, 2019, CAL FIRE queried the California Natural Diversity Database (CNDDDB) for all state or federal listed (or candidate thereof), or CDFW Species of Special Concern (SSC) and Fully Protected (FP), or California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, or 3 vascular plants recorded within and adjacent to the project area. The CNDDDB query included thirteen 7.5-minute quadrangles adjacent to the Sanger and Wahtoke quadrangles (i.e., Clovis, Round Mtn, Piedra, Pine Flat Dam, Malaga, Orange Cove North, Conejo, Selma, Reedley, and Orange Cove South). Table 1 (attached) provides the scoping list and an assessment of the potential for each species to occur in the project area.

### Survey Methodology

Biological surveys were conducted by CAL FIRE Forester I, Ryan Wimmer, on February 12, 2019. CAL FIRE Environmental Scientist, Liza Iegorova and Ryan Wimmer also conducted a survey on March 19, 2019. Surveys were conducted to determine presence of species listed in Table 1. Botanical surveys have also been conducted in previous years by Ms. Jane Pritchard (CNPS Sequoia Chapter, Rare Plant Committee Chairperson) and her students. Surveys were conducted on foot and covered the entire project area. Surveys were conducted during bloom periods or otherwise detectable periods of those vertebrate species identified in the biological scoping as having potential to occur in the project area. Vascular plant species observed were identified to the level necessary to determine rarity. Additionally, during surveys the project area was assessed for sensitive natural communities with a State Rank (SR) of S1, S2, or S3, referencing CDFW's California Sensitive Natural Communities List.

### Survey Results and Recommendations

No state or federally listed rare, threatened, or endangered; or CRPR 1, 2, or 3 plant species were detected during the botanical surveys. No bird, reptile, amphibian, or mammal species scoped for within Table 1 were located during site visits. Additionally, no sensitive natural communities with a SR of S1, S2, or S3 were identified.

The project area is characterized as an annual grassland (predominantly non-native grasses) with valley oak (*Quercus lobata*) occurring throughout. Geologically, the area occurs within an alluvial flood plain near braids of Collins Creek within the Kings River watershed (Calwater Planning Watershed No. 7551.700000).

Dominant tree species include valley oak (*Quercus lobata*), Fremont cottonwood (*Populus fremontii*) and western sycamore (*Platanus racemosa*). Understory shrubs observed include Himalayan blackberry (*Rubus armeniacus*), sky lupine (*Lupinus nanus*), grape species (*Vitis*

*spp.*), and California wild rose (*Rosa californica*). Similarly, the forb and grass layer is diverse with many native annual and perennial species, as well as non-native species.

The annual grassland is predominantly comprised of non-native grass species such as soft chess (*Bromus hordeaceus*), ripgut grass (*Bromus diandrus*), and pepperweed (*Lepidium latifolium*). Non-native forbs such as yellow star-thistle (*Centaurea solstitialis*) and redstem filaree (*Erodium cicutarium*) also occur in the annual grassland. There is a component of native species such as stinging nettle (*Urtica dioica*), waxy fiddleneck (*Amsinckia vernicosa*), and Yerba Mansa (*Anemopsis californica*).

### Weeds

Numerous non-native weedy species were observed in the project area. The California Invasive Plant Council (Cal-IPC) and California Department of Food and Agriculture (CDFA) rate non-native plants using a variety of criteria to, in part identify weeds with the greatest threat to California ecosystems, native plant species, and/or agricultural crops. Table 2 provides the Cal-IPC and CDFA ratings for those non-native species detected in the project area that have been rated. Many of the plants identified in Table 2 were surveyed and provided to CAL FIRE by Ms. Jane Pritchard (Rare Plant Committee Chairperson, Sequoia Chapter CNPS) and her students.

CAL FIRE will incorporate management of certain weeds during the China Creek Project. The species recommended for management include tree of heaven (*Ailanthus altissima*), giant reed (*Arundo donax*), yellow star-thistle (*Centaurea solstitialis*), bull thistle (*Cirsium vulgare*), and Himalayan blackberry (*Rubus armeniacus*). These species are suggested for management because the species would be feasible to eradicate from the project area due to the limited number of individuals present or area occupied and/or the potential ecological threat the species poses.

Several of the species in the project area, such as some of the non-native annual grasses (e.g. *Bromus spp.*) pose significant ecological threats; however, control of the species is less feasible at this time, in part due to their widespread occurrence in the geographical region. In the future, management of species other than those recommended in this report should be considered.

Specific locations of plant species targeted for management were not recorded during the botanical survey; however, these species were observed throughout the project area.

Several management options for weeds are available and vary with the species. However, in general, repeated manual removal of plants (including roots) prior to flowering over multiple years may be used as a successful management tool. Disposal of removed plant material from the project area is recommended to prevent reestablishment or seeding from plant material left on site. Prescribed fire is the preferred management tool for this project and has shown a positive response in reducing incidence of yellow starthistle and other species targeted for treatment. Positive identification of all species to be treated, prior to treatment is important to avoid accidental treatment of non-target species. CDFW may be contacted to assist with development of a weed management plan for the China Creek Project, in which species specific management strategies may be developed in cooperation with the land manager (County of Fresno) and partner groups like the CA Native Plant Society.

2019058111

## References

- Baldwin, B., D. Goldman, D. Keil, R. Patterson, T. Rosatti, and D. Wilken. 2012. The Jepson Manual Vascular Plants of California Second Edition.
- California Invasive Plant Council. California Invasive Plant Inventory (available online). Website: <https://www.cal-ipc.org/plants/inventory/>. 4 April 2019.
- California Native Plant Society, Rare Plant Program. 2018. Inventory of Rare and Endangered Plants of California (online edition). Website: <http://www.rareplants.cnps.org>. 29 March 2019.
- California Department of Fish and Wildlife, Natural Diversity Database, RareFind Government Version 5.2.14. Online. 5 March 2019.
- California Department of Food and Agriculture. Noxious Weed Ratings and Noxious Weed List (available online). Website: [https://www.cdfa.ca.gov/plant/IPC/encycloweedia/wininfo\\_weedratings.html](https://www.cdfa.ca.gov/plant/IPC/encycloweedia/wininfo_weedratings.html). 12 April 2019.
- Pritchard, Jane. 2019. Vascular Plant Species List for China Creek Park.

Table 2. List of vascular plant species observed during the China Creek botanical survey.

Scientific Name	Common Name	<sup>1</sup> Cal-IPC/ <sup>2</sup> CDFR Rating
<i>Ailanthus altissima</i>	Tree of Heaven	Moderate/Noxious
<i>Alnus rhombifolia</i>	white alder	
<i>Amsinckia vernicosa</i>	waxy fiddleneck	
<i>Anemopsis californica</i>	Yerba Mansa	
<i>Anthriscus caucalis</i>	bur-chervil	
<i>Arundo donax</i>	giant reed	High/Noxious
<i>Avena fatua</i>	wild oat	
<i>Bromus hordeaceus</i>	soft chess	Limited/-
<i>Bromus diandrus</i>	ripgut grass	Moderate/-
<i>Calandrinia ciliata</i>	red maid	
<i>Capsella bursa-pastoris</i>	shepherd's purse	
<i>Cardamine pensylvanica</i>	bittercress	
<i>Carex senta</i>	rough sedge	
<i>Centaurea solstitialis</i>	yellow starthistle	High/Noxious
<i>Cephalanthus occidentalis</i>	button bush	
<i>Ceratodon purpureus</i>	red moss	
<i>Cirsium vulgare</i>	bull thistle	Moderate-ALERT/Noxious
<i>Claytonia perfoliata</i>	miner's lettuce	
<i>Cynodon dactylon</i>	bermuda grass	Moderate/-
<i>Cyperus involucratus</i>	umbrella sedge	
<i>Datura wrightii</i>	Jimson weed	
<i>Dichelostemma capitatum ssp. capitatum</i>	bluedicks	
<i>Distichlis spicata</i>	salt grass	
<i>Eichhornia crassipes</i>	water hyacinth	High/-
<i>Eleocharis macrostachya</i>	common spikerush	
<i>Eleusine indica</i>	goose grass	
<i>Equisetum laevigatum</i>	smooth scouring rush	
<i>Erodium botrys</i>	filaree	
<i>Erodium cicutarium</i>	redstem filaree	Limited/-
<i>Ficus carica</i>	edible fig	Moderate/-
<i>Galium aparine</i>	goose grass	
<i>Geranium carolinianum</i>	Carolina geranium	
<i>geranium lucidum</i>	cranes bill	Watch/-
<i>Gilia tricolor</i>	birdseye	
<i>Grindelia camporum</i>	gumplant	
<i>Hordeum murinum</i>	wall barley	Moderate/-
<i>Hypochaeris glabra</i>	smooth cat's-ear	Limited/-
<i>Iris pseudacorus</i>	pale yellow iris	Limited/-
<i>Juncus balticus ssp. ater</i>	wire rush	
<i>Lamium amplexicaule</i>	henbit deadnettle	
<i>Layia pentachaeta ssp. pentachaeta</i>	tidytips	
<i>Lepidium latifolium</i>	perennial pepperweed	High/Noxious
<i>Ligustrum japonicum</i>	Japanese privet	Limited/-
<i>Lonicera japonica</i>	Japanese honeysuckle	
<i>Ludwigia peploides</i>	water primrose	High/-

Table 2. List of vascular plant species observed during the China Creek botanical survey.

<i>Lupinus nanus</i>	sky lupine	
<i>Maclura pomifera</i>	Osage orange	
<i>Melia azedarach</i>	China berry	
<i>Melilotus indicus</i>	sourclover	
<i>Paspalum dilatatum</i>	Dallis grass	
<i>Phoradendron serotinum</i> ssp. <i>tomentosum</i>	American mistletoe	
<i>Phyla nodiflora</i>	lippia	
<i>Plagiobotrys canescens</i>	popcorn flower	
<i>Platanus racemosa</i>	Western sycamore	
<i>Poa annua</i>	annual bluegrass	
<i>Populus fremontii</i>	Fremont cottonwood	
<i>Quercus lobata</i>	valley oak	
<i>Raphanus sativus</i>	wild radish	Limited/-
<i>Rosa californica</i>	California wild rose	
<i>Rubus leucodermis</i>	blackcap raspberry	
<i>Rubus discolor</i>	Himalaya-berry	
<i>Rumex crispus</i>	curly dock	Limited/-
<i>Sagittaria latifolia</i>	broad-leaf arrowhead	
<i>Salix gooddingii</i>	Gooddings black willow	
<i>Salix laevigata</i>	red willow	
<i>Sambucus nigra</i> ssp. <i>caerulea</i>	blue elderberry	
<i>Schoenoplectus acutus</i> ssp. <i>occidentalis</i>	common tule	
<i>Sedella pumila</i>	Sierra mock stonecrop	
<i>Senecio vulgaris</i>	common groundsel	
<i>Silybum marianum</i>	milk thistle	High/-
<i>Solidago velutina</i> ssp. <i>californica</i>	California goldenrod	
<i>Stellaria media</i>	chickweed	
<i>Stephanomeria exigua</i> ssp. <i>macrocarpa</i>	whiteplume wire-lettuce	
<i>Taraxacum officinale</i>	dandelion	
<i>Typha latifolia</i>	cattail	
<i>Urtica dioica</i>	stinging nettle	
<i>Urtica urens</i>	dwarf nettle	
<i>Veronica</i> Spp.	figwort family	
<i>Vicia sativa</i> ssp. <i>nigra</i>	vetch	
<i>Vitis californica</i>	California wild grape	
<i>Vitis vinifera</i>	wine (Thompson) grape	
<i>Xanthium strumarium</i>	cocklebur	

Table 2. List of vascular plant species observed during the China Creek botanical survey.

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**1Cal-IPC rating**

**High**—These species have severe ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal and establishment. Most are widely distributed ecologically.

**Moderate**—These species have substantial and apparent-but generally not severe-ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance. Ecological amplitude and distribution may range from limited to widespread.

**Limited**—These species are invasive but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited/but these species may be locally persistent and problematic.

**2California Department of Food and Agriculture Noxious Weed Ratings**

**B**-An pest of known economic or environmental detriment and, if present in California, it is of limited distribution. B-rated pests are eligible to enter the state if the receiving county has agreed to accept them. If found in the state, they are subject to state endorsed holding action and eradication only to provide for containment, as when found in a nursery. At the discretion of the individual county agricultural commissioner they are subject to eradication, containment, suppression, control, or other holding action.

**C**-A pest of known economic or environmental detriment and, if present in California, it is usually widespread. C- rated organisms are eligible to enter the state as long as the commodities with which they are associated conform to pest cleanliness standards when found in nursery stock shipments. If found in the state, they are subject to regulations designed to retard spread or to suppress at the discretion of the individual county agricultural commissioner. There is no state enforced action other than providing for pest cleanliness.

Table 1. China Creek Park Biological Scoping

Taxon	Scientific Name	Common Name	<sup>1</sup> Federal Status	<sup>2</sup> CA Status	<sup>3</sup> State Rank	<sup>4</sup> CA Rare Plant Rank	<sup>5</sup> Other	Habitats	Analysis	Bloom Period	Survey?	Detected?	Protection Measures
Amphibians	<i>Ambystoma californiense</i>	California tiger salamander	FT	ST	S253		WL	Cismontane woodland   Meadow & seep   Riparian woodland   Valley & foothill grassland   Vernal pool   Wetland	No habitat available for reproduction. Requires standing water and habitat nearby to burrow, which is not present within the project boundaries.		Yes	No	For riparian habitat-associated bird species, Riparian areas will be protected and avoided during project operations which will minimize the threat of impacting the species. No heavy equipment will be allowed within 50ft of a watercourse. No watercourses or riparian areas will be impacted therefore no negative impacts will occur as a result of project operations.
Amphibians	<i>Rana boylei</i>	foothill yellow-legged frog	-	SCT	S3		SSC	Aquatic   Chaparral   Cismontane woodland   Coastal scrub   Klamath/North coast flowing waters   Lower montane coniferous forest   Meadow & seep   Riparian forest   Riparian woodland   Sacramento/San Joaquin flowing waters	Habitat not present within or adjacent to the project area. Substrate requirements aren't met. Not located during field visits.		Yes	No	
Amphibians	<i>Spea hammondi</i>	western spadefoot	-	-	S3		SSC	Cismontane woodland   Coastal scrub   Valley & foothill grassland   Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.		Yes	No	
Birds	<i>Athene cunicularia</i>	burrowing owl	-	-	S3		SSC	Coastal prairie   Coastal scrub   Great Basin grassland   Great Basin scrub   Mojavean desert scrub   Sonoran desert scrub   Valley & foothill grassland	Ground habitat within project area is not conducive to type of habitat required for burrows.		Yes	No	
Birds	<i>Vireo bellii pusillus</i>	least Bell's vireo	FE	SE	S2		-	Riparian forest   Riparian scrub   Riparian woodland	Species is associated with riparian habitat. None of this habitat is present within the proposed operational areas.		Yes	No	If any nesting species are discovered during project implementation, work shall cease near the nest. If the nest is determined to be used by a listed species, then the CAL FIRE biologist will be contacted to determine an appropriate buffer to protect the nest site and CDFW may be contacted for a species consultation. If the nest is not that of a listed species, then the nest shall be protected to the extent to avoid destruction and work shall proceed around the nest site. For riparian habitat-associated bird species, Riparian areas will be protected and avoided during project operations which will minimize the threat of impacting the species. No heavy equipment will be allowed within 50ft of a watercourse. No watercourses or riparian areas will be impacted therefore no negative impacts will occur as a result of project operations.
Birds	<i>Buteo swainsoni</i>	Swainson's hawk	-	ST	S3		-	Great Basin grassland   Riparian forest   Riparian woodland   Valley & foothill grassland	No nests were located within or adjacent to the project area during field visits.		Yes	No	
Birds	<i>Agelaius tricolor</i>	tricolored blackbird	-	SCE	S152		SSC	Freshwater marsh   Marsh & swamp   Swamp   Wetland	Species is associated with riparian habitat. None of this habitat is present within the proposed operational areas.		Yes	No	
Birds	<i>Coccyzus americanus occidentalis</i>	western yellow-billed cuckoo	FT	SE	S1		-	Riparian forest	Species is associated with riparian habitat. None of this habitat is present within the proposed operational areas.		Yes	No	
Crustaceans	<i>Branchinecta lynchi</i>	vernal pool fairy shrimp	FT	-	S3		-	Valley & foothill grassland   Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.		No	No	
Crustaceans	<i>Lepidurus packardii</i>	vernal pool tadpole shrimp	FE	-	S354		-	Valley & foothill grassland   Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.		No	No	
Monocots	<i>Imperata brevifolia</i>	California jettaintail	-	-	S3	2B.1	-	Chaparral   Coastal scrub   Meadow & seep   Mojavean desert scrub   Riparian scrub   Wetland	No habitat available in proposed operational areas.	Sept-May	Yes	No	
Monocots	<i>Tuctoria greenii</i>	Greene's tuctoria	FE	SR	S1	1B.1	-	Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.	May-July	Yes	No	
Monocots	<i>Orcuttia inaequalis</i>	San Joaquin Valley Orcutt grass	FT	SE	S1	1B.1	-	Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.	Apr-Sept	Yes	No	
Monocots	<i>Sagittaria sanfordii</i>	Sanford's arrowhead	-	-	S3	1B.2	-	Marsh & swamp   Wetland	No habitat available in proposed operational areas.	May-Oct	Yes	No	
Dicots	<i>Caulanthus californicus</i>	California jewelflower	FE	SE	S1	1B.1	-	Chenopod scrub   Pinon & juniper woodlands   Valley & foothill grassland	Was not observed during field visits within bloom period.	Feb-May	Yes	No	
Dicots	<i>Tropidocarpum caparideum</i>	caper-fruited tropidocarpum	-	-	S1	1B.1	-	Valley & foothill grassland	Was not observed during field visits within bloom period.	Mar-Apr	Yes	No	
Dicots	<i>Lagophylla dichotoma</i>	forked hare-leaf	-	-	S2	1B.1	-	Cismontane woodland   Valley & foothill grassland	The project area is below the elevational gradient for this species and was not observed during field visits.	Apr-July	Yes	No	
Dicots	<i>Sidalcea keckii</i>	Keck's checkerbloom	FE	-	S2	1B.1	-	Cismontane woodland   Ultramafic   Valley & foothill grassland	Serpentine-derived soils are not present within the project area.	Apr-May	Yes	No	
Dicots	<i>Eriogonum nudum</i> var. <i>regirivum</i>	Kings River buckwheat	-	-	S2	1B.2	-	Cismontane woodland   Limestone	Limestone-derived soils not present within the alluvial deposits within and adjacent to the proposed project area.	Aug-Nov	Yes	No	
Dicots	<i>Leptosiphon serrulatus</i>	Madera leptosiphon	-	-	S3	1B.2	-	Cismontane woodland   Lower montane coniferous forest	The project area is below the elevational gradient for this species and was not observed during field visits.	Apr-May	Yes	No	

Table 1. China Creek Park Biological Scoping

Dicots	<i>Pseudobahia peirsonii</i>	San Joaquin adobe sunburst	FT	SE	S1	1B.1	-	Cismontane woodland   Valley & foothill grassland	Soil type may be present within project boundaries but was not observed during bloom period.	Mar-Apr	Yes	No	
Dicots	<i>Eryngium spinosepalum</i>	spiny-sepaled button-celery	-	-	S2	1B.2	-	Valley & foothill grassland   Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.	Apr-May	Yes	No	
Dicots	<i>Castilleja campestris</i> var. <i>succulenta</i>	succulent owl's-clover	ET	SE	S2S3	1B.2	-	Vernal pool   Wetland	No vernal pool habitat present. Not located within riparian areas adjacent to project operational areas.	Apr-May	Yes	No	
Dicots	<i>Helianthus winteri</i>	Winter's sunflower	-	-	S2?	1B.2	-	Cismontane woodland   Valley & foothill grassland	Project site is characterized by alluvial floodplane gravel soil type, therefore necessary habitat is not present for this species.	Jan-Dec	Yes	No	
Insects	<i>Desmocerus californicus dimorphus</i>	valley elderberry longhorn beetle	FT	-	S2	-	-	Riparian scrub	Elderberry bushes were surveyed for evidence of presence with negative results during field visits.		Yes	No	Elderberry is not proposed for management under this project, therefore no impacts are anticipated.
Mammals	<i>Taxidea taxus</i>	American badger	-	-	S3	-	SSC	Alkali marsh   Alkali playa   Alpine   Alpine dwarf scrub   Bog & fen   Brackish marsh   Broadleaved upland forest   Chaparral   Chenopod scrub   Cismontane woodland   Closed-cone coniferous forest   Coastal bluff scrub   Coastal dunes   Coastal prairie   Coastal scrub   Desert dunes   Desert wash   Freshwater marsh   Great Basin grassland   Great Basin scrub   Interior dunes   Ione formation   Joshua tree woodland   Limestone   Lower montane coniferous forest   Marsh & swamp   Meadow & seep   Mojavean desert scrub   Montane dwarf scrub   North coast coniferous forest   Oldgrowth   Pavement plain   Redwood   Riparian forest   Riparian scrub   Riparian woodland   Salt marsh   Sonoran desert scrub   Sonoran thorn woodland   Ultramafic   Upper montane coniferous forest   Upper Sonoran scrub   Valley & foothill grassland	Soil types within and adjacent to project area not suitable to support species.		Yes	No	
Mammals	<i>Antrozous pallidus</i>	pallid bat	-	-	S3	-	SSC	Chaparral   Coastal scrub   Desert wash   Great Basin grassland   Great Basin scrub   Mojavean desert scrub   Riparian woodland   Sonoran desert scrub   Upper montane coniferous forest   Valley & foothill grassland	No suitable habitat features (caves, hollows, roosts, etc.) present within or adjacent to the project boundary. Area is prone to increased disturbance by human activity.		No	No	
Mammals	<i>Vulpes macrotis mutica</i>	San Joaquin kit fox	FE	ST	S2	-	-	Chenopod scrub   Valley & foothill grassland	Soil types within and adjacent to project area not suitable to support species. Denning features and the species itself was not located during field visits.		Yes	No	
Mammals	<i>Euderma maculatum</i>	spotted bat	-	-	S3	-	SSC		No suitable habitat features (caves, rock formations, hollows, roosts, etc.) present within or adjacent to the project boundary. Area is prone to increased disturbance by human activity.		No	No	
Reptiles	<i>Arizona elegans occidentalis</i>	California glossy snake	-	-	S2	-	SSC		There is an abundance of vegetative cover within the project area that could discourage use by this species. Species was not observed during field visits.		Yes	No	
Reptiles	<i>Phrynosoma blainvillii</i>	coast horned lizard	-	-	S3S4	-	SSC	Chaparral   Cismontane woodland   Coastal bluff scrub   Coastal scrub   Desert wash   Pinon & juniper woodlands   Riparian scrub   Riparian woodland   Valley & foothill grassland	Marginal habitat may exist within or adjacent to the project area but the species was not observed during site visits.		Yes	No	
Reptiles	<i>Anniella pulchra</i>	northern California legless lizard	-	-	S3	-	SSC	Chaparral   Coastal dunes   Coastal scrub	Soil types within and adjacent to project area not suitable to support species. Abundance of vegetative cover is present in project area. Project area is grazed by ungulates.		Yes	No	

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Table 1. China Creek Park Biological Scoping

Reptiles	Emys marmorata	western pond turtle	S3	SSC	Aquatic   Artificial flowing waters   Klamath/North coast flowing waters   Klamath/North coast standing waters   Marsh & swamp   Sacramento/San Joaquin flowing waters   Sacramento/San Joaquin standing waters   South coast flowing waters   South coast standing waters   Wetland	Marginal habitat may exist adjacent to the project area except for basking features typically associated with the species, therefore it is believed the species is not present within or adjacent to the project area. The species was not observed during field visits.	Yes	No	Riparian areas will be protected and avoided during project operations which will minimize the threat of impacting the species. No heavy equipment will be allowed within 50ft of a watercourse. No watercourses or riparian areas will be impacted therefore no negative impacts will occur as a result of project operations. <sup>1</sup>
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**1Federal Status**  
 FE - Endangered - Species in danger of extinction throughout all or a significant portion of its range.

**2State Status**  
 SR - State Rare-Species, subspecies, or variety with such small numbers throughout its range that, although not presently threatened with extinction, it may become endangered if its present environment worsens.  
 SE - State Endangered-Species, subspecies, or variety in serious danger of becoming extinct throughout all, or a significant portion of its range due to one or more causes.  
 ST - State Threatened -  
 SCE - State Candidate for Listing as Endangered  
 SCT - State Candidate for Listing as Threatened

**3State Rank**  
 SH-All California Sites are historical.  
 S1-Critically imperiled in the state because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the state.  
 S2-Imperiled in the state because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the state.  
 S2S3-Represents the range of uncertainty about the status of the species.

**4California Rare Plant Rank**  
 1A-Plants presumed extirpated in California and either rare or extinct elsewhere. 1B-Plants rare, threatened, or endangered in California and elsewhere.  
 2B-Plants rare, threatened, or endangered in California, but more common elsewhere. 3-Plants about which more information is needed.

**California Rare Plant Rank Threat Ranks**  
 0.1-Seriously threatened in California  
 0.2-Moderately threatened in California  
 0.3-Not very threatened in California

**5Other**  
 CA Department of Fish and Wildlife Status  
 WL - Watch List

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

1234 E. Shaw Avenue  
FRESNO, CA 93710  
(559) 222-3714  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



March 21, 2019

Ryan Wimmer  
Fresno-Kings Unit (FKU)  
210 S. Academy Ave  
Sanger, CA 93657

Re: Archaeological Clearance for China Creek Training Project

This letter serves as archaeological clearance for the China Creek Training Project located at China Creek Park near Centerville in Fresno County. This project involves the use of prescribed fire to achieve fuel modification and provide training opportunities. A records check was conducted for the project (19-072) and found no previously recorded resources on or near the property. Native American letters were sent out including to the Native American Heritage Commission, which determined that there was potentially a sacred site within the project boundaries. David Alvarez, Chairperson of the Traditional Choinumni Tribe, was contacted to determine whether a sacred site was in fact within the project area, what was the nature of the site, and what was required to protect it. During a phone conversation with Chairperson Alvarez on March 19, 2019, he stated that the project area is a former use area for his tribe and that an encampment was once located in the vicinity. He did not mention any specific resources within the project area. His only concern was the potential for resources to be disturbed during the proposed road grading. He therefore requested that any ground disturbance, specifically road grading, be monitored by an archaeologist. Otherwise, he did not raise any objections to the project.

A site visit for the project was conducted on March 19, 2019 by CAL FIRE archaeologist Denise Ruzicka to inspect the project area and conduct a cursory survey of the project's boundary. During the site visit, no evidence of cultural resources, either archaeological or historical, was observed. However, the ground surface visibility was extremely poor due to dense vegetation cover. Therefore, it was agreed that a more intensive survey of the project would be conducted after the completion of the project when surface visibility should be improved.

Recommendations for the project include the presence of an archaeologist to monitor all road grading within the project area. If this monitoring is conducted, there is a low potential for cultural resources to be significantly impacted within the project area.

If previously unknown cultural resources are observed at any point during project implementation, then work should halt immediately within the vicinity of the find and the region CAL FIRE archaeologist should be contacted along with the Unit Forester. Work cannot resume until a qualified cultural resource professional has assessed the find, determined the proper mitigation measures, and given permission for work to continue.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Ruzicka', with a horizontal line extending from the end of the signature.

Denise Ruzicka, RPA  
Associate State Archaeologist  
California Department of Forestry and Fire Prevention