China Wall OHV Staging Area Expansion / Loops 5 and 6 Reroutes
U.S. Forest Service Tahoe National Forest
Initial Study/Mitigated Negative Declaration

June 2025

State of California
Department of Parks and Recreation,
Off-Highway Motor Vehicle Recreation Division

China Wall OHV Staging Area Expansion / Loops 5 and 6 Reroutes U.S. Forest Service Tahoe National Forest Initial Study/Mitigated Negative Declaration

June 2025

Prepared for:

State of California, Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
P.O. Box 942896
Sacramento, CA 94296-0001
(916) 324-4442
www.ohv.parks.ca.gov

Prepared by:

MIG, Inc.
2055 Junction Avenue, Suite 205
San Jose, CA 95131
(650) 327-0429
(650) 327-4024 Fax
www.migcom.com

DRAFT MITIGATED NEGATIVE DECLARATION

Project: China Wall OHV Staging Area Expansion / Loops 5 and 6 Reroutes

Project Sponsor: U.S. Forest Service (USFS) Tahoe National Forest (TNF), American River Ranger District

Lead Agency: California Department of Parks and Recreation (CDPR), Off-Highway Motor Vehicle Recreation (OHMVR) Division

Availability of Documents: The Initial Study for this Mitigated Negative Declaration is available for review on the OHVR Division's website on the CEQA/EIR Notices page at: https://ohv.parks.ca.gov/?page_id=26379

PROJECT DESCRIPTION

The OHMVR Division proposes to award grant funds to the Tahoe National Forest to expand the existing China Wall Off-Highway Vehicle (OHV) and Over Snow Vehicle Staging Area (China Wall) by 61,200 square feet to provide for approximately 24 vehicle/trailer combinations, and to construct 6 reroutes that would replace 4.5 miles of existing unsustainable trail in the Sugar Pine OHV trail system on Loop 5 (T15N, R11E, Sec. 10, 11, 13, & 14) and Loop 6 (T15N, R11E, Sec. 25, 35, & 36). The China Wall OHV Staging Area Expansion (China Wall SA Expansion) would re-pave existing parking areas; pave the expanded area to match existing paved areas; remove and replace the existing and outdated double-unit concrete vault restroom and install one new double-unit concrete vault toilet; install two bear proof garbage cans; construct a connector trail to OHV Loop 5 (11E43), approximately 50 feet in distance; install barriers, such as large boulders, around the edge of the expanded parking area to restrict use outside and define the boundaries of the expanded area; fell and remove approximately 200 trees; and install additional signage, to include an informational kiosk and directional parking signs. Loops 5 and 6 are single-track trails open to motorcycles and nonmotorized users only. The Loops 5 and 6 Reroutes involve flagging reroute sections, cutting the primary corridor, constructing the new trail alignment, and diverting riders to the newly aligned trail segments using barriers and signage.

PROPOSED FINDING

The OHMVR Division has reviewed the Initial Study and determined that the Initial Study identifies potentially significant project effects, but:

1. Revisions to the project plans incorporated herein as mitigation would avoid or mitigate the effects to a point where no significant effects would occur; and

2. There is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment. Therefore, pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15064(f)(3) and 15070(b), a Mitigated Negative Declaration has been prepared for consideration as the appropriate CEQA document for the project.

BASIS OF FINDING

Based on the environmental evaluation presented in the attached Initial Study, the project would not cause significant adverse effects related to aesthetics, agricultural and forestry resources,

air quality, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities/service systems, or wildfire. The project would not have impacts that are individually limited but cumulatively considerable. The project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

The environmental evaluation has determined that the project would have potentially significant impacts on biological resources and tribal cultural resources, as described below.

Mitigation Measures

The project could result in significant adverse effects on biological resources and tribal cultural resources. However, the project includes the mitigation measures listed below, which would reduce these impacts to less-than-significant levels. With implementation of these mitigation measures, the proposed project would not substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant, or affect any important examples of the major periods of California prehistory or history.

Mitigation Measures Incorporated into the Project	
Impact BIO-1: The proposed project could occur in areas potentially containing special-status plant species resulting in disturbance of individual plants or their habitat.	**Mitigation Measure BIO-1: Special-Status Plants Surveys and Protection**. A qualified botanist shall conduct protocol-level survey(s) of the project site and a 100-foot buffer for special-status plants prior to the start of all ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, grading, paving, and fence or barrier installation). The survey(s) shall be conducted during the blooming season for all potentially occurring special-status plant species, according to the most current methodology recommended by California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS), depending on the listing status of the species. The surveys shall include but not be limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys shall not be conducted during drought conditions when certain annual species may not be present. The results of the survey(s) shall be documented in a written report submitted to the OHMVR Division. The location and extent of all occurrences of special-status plant species encountered during the surveys shall be mapped and maintained in the USFS database. If the start of work is delayed, the special-status plant surveys shall be repeated every 5 years to ensure that data are current and to account for long-term and seasonal variation. Known special-status plant populations and any special-status plants identified in the survey(s) shall be flagged and avoided with a minimum 100-foot buffer or best management practices (BMPs) shall be utilized to prevent indirect impacts on the special-status plants if the buffer is smaller. If any special-status plants cannot be avoided, they shall be transplanted to a suitable habitat area outside the work site that won't be disturbed in the future under the supervision of a qualified botanist. A qualified botanist is defined as a biologist that has a degree in botany, or similar degree; can identify the special-status and common plant species that may occur in the project region; and have a minimum of two field seasons of experience conducting special-status plant surveys with positive identification of special-status plants in the project region.

Mitigation Measures Incorporated into the Project	
Impact BIO-2: The proposed project could have short-term impacts on nesting birds during construction, either directly by removing nests resulting in injury or mortality, or indirectly by disturbing nesting birds.	**Mitigation Measure BIO-2: Protection of Special-Status and Nesting Birds**. To avoid impacts on nesting birds and violation of state and federal laws pertaining to birds, all ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree or other vegetation removal, grading, paving, and fence or barrier installation) should occur outside the avian nesting season (that is, prior to February 1 or after September 15). If ground-disturbing activities and construction noise occurs within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed for the presence of active nests by a qualified biologist no more than seven days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than seven days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented and submitted to the OHMVR Division. If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist, until the chicks have fledged. Monitoring shall be required to ensure compliance with relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented. A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; a minimum of two years of experience in nesting bird surveys with positive results; and must be able to identify the species and be familiar with nesting behavior of common and special-status bird species found in the project area.

Mitigation Measures Incorporated into the Project	
Impact BIO-3: The proposed project could impact roosting bats protected by California Fish and Game Code.	**Mitigation Measure BIO-3: Special-Status and Roosting Bat Protection**. Not less than 30 days before the start of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree or other vegetation removal, grading, paving, and fence or barrier installation), a qualified biologist shall survey the work site and a 50-foot buffer for bat roosting habitat (large trees with cavities, rock outcrops, caves, and mines). If bat roosting habitat and/or signs of bats (e.g., guano pellets or urine staining) are identified in the survey, a follow-up dusk emergence survey shall be conducted by a qualified biologist prior to the start of construction activities. A dusk survey will determine the number of bats present and shall also include the use of acoustic equipment to determine species of bats present. The results of the surveys shall be documented and submitted to the OHMVR Division. If roosting bats are detected, they shall be avoided with roost avoidance buffers, seasonal activity restrictions, or monitoring of roost locations. If an occupied maternity or colony roost is detected, CDFW shall be consulted to determine appropriate measures, such as the establishment of a no-disturbance buffer. A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has at least two years of experience conducting bat surveys that resulted in detections for the relevant species; and is familiar with the types of equipment used to conduct surveys.
Impact TRIB-1: The proposed project construction could disturb and impact areas of cultural sensitivity, including both the ground and surrounding vegetation, along the new trail alignments.	**Mitigation Measure TRIB-1:** Project activities shall avoid identified areas of cultural sensitivity as best possible, including vegetation. These actions include: 1) protection of as many elderberry trees during new trail construction along Loop 5 “West” (near Damascus); 2) avoid disturbance to the flat terrain by taking new trail alignment off the flat terrain sooner along Loop 5 “East” (near Red Point); and 3) establish extra wide buffer for avoidance from mechanized equipment along Loop 5 “Upper China Wall” (Humbug Ridge) and notify Tribe prior to implementation.
Impact TRIB-2: The proposed methods to decommission the existing trail along Loop 6 (Mitchell Mine Road) could further disturb culturally sensitive sites.	**Mitigation Measure TRIB-2:** Tribe shall be notified prior to implementation of trail decommission actions. Tribe may require monitor on site during the implementation of decommissioning the old trail segment.

Impact TRIB-3: Project construction could disturb or damage unknown Tribal Cultural Resources (TCRs) resulting in an adverse change in the significance of the resource.	**Mitigation Measure TRIB-3:** If any suspected TCRs or resources of cultural significance to affiliated tribes as identified by the Native American Heritage Commission (NAHC), including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resource specialist, or professional archaeologist. A Tribal Representative, the OHMVR Division, as CEQA Lead Agency, and the TNF shall be immediately notified. The Tribal Representative, in coordination with the Lead Agency and TNF, shall determine if the find is a TCR (PRC §21074), and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary. The culturally affiliated Tribe shall consult with the OHMVR Division and TNF to (1) identify the boundaries of the new TCR and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or (3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the culturally affiliated Tribe. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a Conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored. The construction contractor(s) and TNF shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request. Any discoveries shall be documented on a CDPR 523 form within 2 weeks of the discovery and submitted to the appropriate California Historic Resources Information System (CHRIS) center in a timely manner. Work at the TCR discovery location shall not resume until authorization is granted by TNF in coordination with the culturally affiliated Tribe.

Mitigation Measures Incorporated into the Project	
	If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the Placer County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the Place County Coroner that the find is Native American in origin, the NAHC will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.
Impact TRIB-4: Project activities, including but not limited to construction, staging, ground disturbance, and retirement of the existing trail, could damage the identified resources resulting in an adverse change in the significance of the resource.	**Mitigation Measure TRIB-4:** The areas of the identified resources shall be avoided in the staging and other construction-related activities to prevent further exposure and damage to the resources. Tribes shall be consulted to devise an appropriate trail retirement strategy that considers the protection of resources on and along the existing trail.

RECORD OF PROCEEDINGS AND CUSTODIAN OF DOCUMENTS

The record, upon which all findings and determinations related to the approval of the project are based, includes the following:

1. The Mitigated Negative Declaration and all documents referenced in or relied upon by the Mitigated Negative Declaration.

2. All information (including written evidence and testimony) provided by OHMVR Division staff to the decision maker(s) relating to the Mitigated Negative Declaration, the approvals, and the project.

3. All information (including written evidence and testimony) presented to the OHMVR Division by the environmental consultant who prepared the Mitigated Negative Declaration or incorporated into reports presented to the OHMVR Division.

4. All information (including written evidence and testimony) presented to the OHMVR Division from other public agencies and members of the public related to the project or the Mitigated Negative Declaration.

5. All applications, letters, testimony, and presentations relating to the project.

6. All other documents composing the record pursuant to Public Resources Code section 21167.6(e).

The OHMVR Division is the custodian of the documents and other materials that constitute the record of the proceedings upon which the OHMVR Division's decisions are based. The contact for this material is:

Scott Soares, Senior Environmental Scientist Supervisor
CDPR, OHMVR Division
P.O. Box 942896
Sacramento, CA 94296-0001
Phone: (916) 247-1610
Email: scott.soares@parks.ca.gov

Pursuant to section 21082.1 of CEQA, the OHMVR Division has independently reviewed and analyzed the IS/MND for the proposed project and finds these documents reflect the independent judgment of the OHMVR Division.

China Wall OHV Staging Area Expansion / Loops 5 and 6 Reroutes Initial Study

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Chapter 1. INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division proposes to award grant funds to the U.S. Forest Service (USFS or Forest Service) Tahoe National Forest (TNF), American River Ranger District (ARRD) for the China Wall Off-Highway Vehicle (OHV) Staging Area Expansion (China Wall SA Expansion) and Loops 5 and 6 Reroutes. The proposed project would expand the existing China Wall OHV Staging Area (China Wall SA) by 61,200 square feet (sq. ft.) to provide for approximately 24 vehicle/trailer combinations, and construct 6 trail reroutes that would replace 4.5 miles of existing unsustainable single-track trail in the Foresthill OHV Area on Loop 5 (T15N, R11E, Sec. 10, 11, 13, & 14) and Loop 6 (T15N, R11E, Sec. 25, 35, & 36) in Placer County, California.

The California Environmental Quality Act (CEQA; Public Resources Code [PRC] § 21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.) establish the OHMVR Division as the lead agency. The lead agency is defined in CEQA Guidelines Section 15367 as "the public agency which has the principal responsibility for carrying out or approving a project." The lead agency decides whether an Environmental Impact Report (EIR) or Negative Declaration is required for the project and is responsible for preparing the appropriate environmental review document.

According to CEQA Guidelines Section 15070, a public agency shall prepare a proposed Negative Declaration or a Mitigated Negative Declaration (MND) when:

1. The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

2. The Initial Study identifies potentially significant effects, but:

    a. Revisions in the project plans made before a proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

    b. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Pursuant to Section 15070, the OHMVR Division has determined a Mitigated Negative Declaration is the appropriate environmental review document for the China Wall SA Expansion / Loops 5 and 6 Reroutes.

1.2 LEAD AGENCY CONTACT INFORMATION

The OHMVR Division is providing funding for the project and is the CEQA lead agency. The contact person for the lead agency regarding the project is:

Scott Soares, Senior Environmental Scientist Supervisor
CDPR, OHMVR Division
P.O. Box 942896
Sacramento, CA 94296-0001
Phone: (916) 247-1610
Email: scott.soares@parks.ca.gov

1.3 DOCUMENT PURPOSE AND ORGANIZATION

This document is a CEQA Initial Study for the proposed China Wall SA Expansion / Loops 5 and 6 Reroutes. The purpose of this Initial Study is to evaluate the potential environmental effects of developing the project. This document is organized as follows to meet the requirements of CEQA:

- Chapter 1 – Introduction. This chapter introduces the project and describes the purpose and organization of this document.
- Chapter 2 – Project Description. This chapter describes the project objectives and characteristics including the standard practices or best management practices (BMPs) that would be implemented by the Forest Service as part of the project. It also identifies the required permits and approvals.
- Chapter 3 – Environmental Checklist and Responses. This chapter presents project setting information and responses to the CEQA-based environmental checklist questions for each resource topic for the impacts associated with the proposed project.
- Chapter 4 – References and Report Preparation. This chapter identifies all publicly available information, and personal communications cited in this report and provides a list of those involved in the preparation of this document.

Chapter 2. PROJECT DESCRIPTION

The information below is based on the China Wall SA Expansion and Loops 5 and 6 Reroutes Final Applications for the 2024 (G24) OHMVR Division Grants and Cooperative Agreements Program (Grants Program) (USFS 2024a and 2024b), personal communication with TNF (Brownlee 2024), and an October 2024 site visit.

2.1 PROJECT LOCATION AND SITE DESCRIPTION

The China Wall SA Expansion / Loops 5 and 6 Reroutes project site is located within the American River Ranger District (ARRD) of the TNF in Placer County, California (Figure 2-1). The site is in the Sierra Nevada Mountain Range (Sierra Nevada or Sierra), about 28 miles northwest of Lake Tahoe at its closest point (as the crow flies). China Wall SA is located about 12 miles northeast of Foresthill, accessed by Foresthill Road. Loop 5 is located to the northeast and Loop 6 is to the south of China Wall SA; both loops are accessible from the staging area. China Wall SA and Loops 5 and 6 are part of the Foresthill OHV trail system (Figure 2-2). In this IS, "project site" refers to the China Wall SA Expansion area and Loops 5 and 6 Reroutes; each is referred to by name individually (i.e., China Wall SA, Loop 5, or Loop 6) when the information or analysis only refers to one of the sites.

The existing, approximately one-acre China Wall SA is currently developed with a double-unit restroom and paved parking area that can accommodate approximately 20 vehicles towing trailers and 10 passenger vehicles (Figure 2-3). China Wall SA provides access to the Foresthill OHV trail system and is directly connected to Loops 5 and 6. Loops 5 and 6 are single-track trails open to motorcycles and nonmotorized users only (Figure 2-4). During winter, China Wall SA serves as a staging area for over snow vehicles (OSV).[1] Loop 5 is an 18.2-mile loop trail that traverses Humbug Ridge and is rated as More Difficult (the intermediate rating of difficulty) and Most Difficult (the highest level of difficulty rating) (Figure 2-2). Loop 6 is a 15.2-mile loop trail that encircles Deadwood Ridge Road and is rated as Most Difficult (Figure 2-2). The China Wall SA and Loops 5 and 6 are surrounded by conifer forest. The area south of the China Wall SA that includes Loop 6 burned in the 2022 Mosquito Fire.

2.2 PROJECT BACKGROUND

The ARRD prepared a National Environmental Policy Act (NEPA) Environmental Assessment (EA) for the OHV Staging Area Construction and Expansions Project in January 2013 (OHV SA and Expansions EA) (USFS 2013), which included the China Wall SA Expansion as well as expansion of the Sugar Pine OHV Staging Area and construction of the new Brimstone OHV Staging Area. The TNF applied for OHMVR Division Grants Program funding for the expansion of the Sugar Pine OHV Staging Area and construction of the new Brimstone OHV Staging Area in 2015, and a CEQA Mitigated Negative Declaration (MND) and Supplement to the EA was prepared for those projects in January 2016 (MIG | TRA Environmental Sciences, Inc. 2016). The expansion of the Sugar Pine OHV Staging Area and construction of the new Brimstone OHV Staging Area were completed in 2017. In 2024, the TNF applied for Grants Program funding for the China Wall SA Expansion and was granted funding. Thus, this CEQA document includes only the China Wall SA Expansion portion of the OHV SA and Expansions EA (USFS

[1] As an OSV is considered a type of OHV, from here on the term OHV in this CEQA document refers to both OHV and OSV. The term OSV is occasionally used to refer to only over snow vehicles.

2013) but also references the relevant sections of the EA where applicable to the China Wall SA Expansion.

The ARRD prepared a NEPA EA for the Big Sugar Project in June 2019 (USFS 2019), which included removing fixed wet weather seasonal closures and replacing them with a wet weather operating plan in the lower elevations of the Big Sugar Project area; constructing 24 miles of motorized single track trail; rerouting 46 miles and decommissioning 30 miles of unsustainable motorized trail segments; constructing 11 short narrow bridges; installing gates, barriers and fencing; and allowing for motorized mixed use on 0.25 miles of National Forest System (NFS) road 43. The TNF applied for OHMVR Division Grants Program funding for the 24 miles of new single track trail (Robinson Flat to China Wall connector trail) in 2020, and a CEQA Use of a Finding of No Significant Impact (FONSI) in lieu of a Negative Declaration was prepared for the trail in April 2021 (MIG, Inc. 2021). In 2024, the TNF applied for and was granted Grants Program funding for the Loops 5 and 6 Reroutes, which were included in the 46 miles of reroutes evaluated in the Big Sugar Project EA. The EA for the Big Sugar Project is referenced where relevant to the Loops 5 and 6 Reroutes, but the other actions proposed in the EA are not covered in this CEQA document.

The proposed project includes the China Wall SA Expansion and Loops 5 and 6 Reroutes, proposed by the TNF ARRD and covered in the two NEPA EAs described above. Since Loops 5 and 6 are near the China Wall SA and both OHMVR Division funded projects would be implemented around the same time, the OHMVR Division determined evaluating the China Wall SA Expansion and the Loops 5 and 6 Reroutes in the same CEQA document provided the clearest assessment of both projects.

The China Wall SA provides access to 86 miles of designated motorized single-track trails (including Loops 5 and 6) and an additional 60 miles of groomed snowmobile trails. The trail system provides riding opportunities for beginner to expert riders and is within a two-hour drive of several metropolitan areas such as Sacramento, the San Francisco Bay area, and Reno. During optimal riding season, generally April, May, June, and October, routine OHV patrols have seen 500-600 riders/week using the area. July, August, September, and November OHV patrols have seen 100-300 riders/week. During the winter snowmobile season, routine OSV patrols have seen 50 to 100 riders/week using the China Wall SA. Three formal staging areas (Sugar Pine, Parker Flat, and China Wall) were built in the 1980's with Green Sticker Grant funds, and the Brimstone OHV campground was constructed in 2017. These staging areas provide access for hikers, mountain bikers, equestrians, and OHV users to the trail system and have basic amenities such as sanitation facilities and information bulletin boards. Over the past 10 years China Wall SA use has increased, specifically among OHV users, resulting in overcrowding and insufficient parking opportunities.

2.3 PROJECT OBJECTIVES AND NEED

2.3.1 China Wall OHV Staging Area Expansion

The objectives of the China Wall SA Expansion are to meet increased parking demand during high use periods, accommodate larger vehicles with trailers, and provide for public safety and increased OHV recreational experiences. The proposed expansion would better serve the OHV recreationists using the ARRD OHV trail network and facilities by providing needed additional formal parking and sanitation facilities.

During the summer season, the China Wall SA serves as a popular trailhead for dirt bike users accessing the main Sugar Pine Core Area, as well as quickly accessing Loops 5 and 6 and the

recently completed Robinson Flat to China Wall connector trail, known as the Big Sugar Trail. The Big Sugar Trail is a new 24-mile motorized singletrack trail that connects Loop 5 and Robinson Flat campground. This new trail has increased the use of the China Wall SA and/or Loops 5 and 6 in the summer months.

The China Wall SA is the only staging area for OSV activity in the area. When there is snow, the China Wall SA is usually very congested. Congestion and lack of parking has led to users parking illegally and unsafely on the Foresthill Divide Road (County Road 0088) or choosing not to recreate from the staging area at all. Both Placer County Sheriff and the Forest Service have cited vehicles parked on the Foresthill Divide Road.

When the China Wall SA was built, the vehicles and trailers used by OHV users were much smaller than those seen today. Today's larger vehicles, such as motorhomes and trucks towing "toy haulers," which are trailers with space for carrying vehicles and camping, exceed the capacity of the existing staging area. These large vehicles also have a much larger turning radius, which creates safety concerns, especially when the China Wall SA is full and there is ice and/or new snow on the ground.

2.3.2 Loops 5 and 6 Reroutes

The objectives of the Loops 5 and 6 Reroutes are to reduce trail erosion and ongoing trail maintenance requirements, address trail safety concerns, and to increase user enjoyment of the trails. Loops 5 and 6 trail sections proposed for reroute (Figure 2-6) are overly steep and heavily eroded. Rerouting these segments of trails to sustainable grades (5 to 10 percent) with grade reversals incorporated into the alignment would reduce erosion and maintenance frequency. Rerouting of these trail sections would also address safety concerns associated with channelized trail tread, exposed obstructions, existing road segments, and steep hill climbs with limited sight distances. The reroutes would also increase net mileage of motorized singletrack for motorcycle users and increase opportunities for nonmotorized trail users. Hiking and competitive running have become popular on the trail segments proposed for reroutes, and these reroutes would provide for a less steep hiking/running experience while providing scenic views of canyons. The trail reroutes would also provide hunting and birding opportunities.

2.4 PROJECT CHARACTERISTICS

2.4.1 China Wall OHV Staging Area Expansion

The China Wall SA Expansion would:

- Increase pavement area of the staging area by 61,200 sq. ft. (approximately 1.5 acres) which would provide approximately 24 parking spaces for vehicles pulling trailers.
- Re-pave existing parking areas to match the new expansion (approximately 1 acre).
- Install one new doulble vault toilet, which would require approximately 150 sq. ft. of ground disturbance.
- Replace one existing double-vault toilet, which would not require any new ground disturbance.
- Install two bearproof garbage cans, which would require approximately 10 sq. ft. of new ground disturbance.
- Construct a connector trail to OHV Loop 5, approximately 50 feet in length.
- Install barriers, such as large boulders, around the perimeter of the expanded paved parking area, approximately 800 linear feet.

- Fell and remove approximately 200 trees, ranging from 6 to 24 inches in diameter at breast height (dbh).
- Install one informational kiosk at the trailhead.
- Install 10 directional parking signs.
- Install one sign designating unloading area and five no parking signs in fire lines around staging area.

See Figure 2-5 for the China Wall SA Expansion site plan.

2.4.2 Loops 5 and 6 Reroutes

The Loops 5 and 6 Reroutes includes six segments of trail reroutes that would replace 4.5 miles of existing unsustainable single-track trails in the Foresthill OHV Area. The sustainable reroutes would total 8.06 miles and would reduce soil erosion, improve the riding experience, and enhance user safety. Rerouting each trail segment involves two steps: 1) the ARRD trails staff would re-flag reroute sections and Forest Service crews or partner organizations would cut the primary corridor; 2) ARRD trails staff would construct the new trail alignment and divert riders to the newly aligned trail segments using barriers and signage. A single-track trail dozer (18-24" blade instead of 48") or hand work would be the preferred method of construction for developing and maintaining these reroutes so that the single-track character of these trails is consistent with user preference. Barriers and signage would be used to encourage use of the rerouted segments and discourage use of the old, unsustainable trail segments. ARRD fire crew personnel and volunteer hand crews would assist with the trail construction. Volunteer groups include Western States Endurance Run Foundation, Nevada County Woods Riders, Bicyclists of Nevada County, Canyons Endurance Runs, and Foresthill Woods Riders.

Loop 5 (four locations): The proposed project would reroute four segments of existing trails totaling 2.18 miles where long, steep, and precipitous sections of trail exist with grades exceeding 10-20% (Figures 2-6 through 2-9). Reroutes of these trail segments, totaling 5.11 miles, would require less maintenance frequency and nearly double the single track dirt bike riding experience with a more sustainable trail. Barriers would be used to direct the riders onto the reroutes and deter continued use of the old trail alignments. Signs saying *OHV Funds at Work* would be installed along the rerouted trail sections.

Loop 6 (two locations): The proposed project would reroute two segments of existing trail totaling 2.32 miles where there is a steep ascent to the Mitchell Mine Road (FS 0088-13 Rd.) that then steeply descends back to wide and eroded trail (Figures 2-6 and 2-10). The steep sections of trail (15 to 25+ % grades) are heavily eroded with unsuccessful drainage features even with frequent tail maintenance. Reroutes of these segments, totaling 2.95 miles, would remove the trail segments from the road, and contour the steep canyon edge in a sustainable grade (5- 10%) while incorporating reverse grades and effective drainage features. Reroutes would also create a singletrack trail experience for OHV users while eliminating the safety concerns of the existing alignment. Barriers would be used to direct riders onto the reroutes and deter continued use of the old road section and previous alignments. Signs saying *OHV Funds at Work* would be installed along the rerouted trail sections.

2.5 CONSTRUCTION SCHEDULE AND EQUIPMENT

2.5.1 China Wall OHV Staging Area Expansion

TNF plans to begin project construction in spring or summer 2026 and complete the project by

- Staking and site preparation
- Tree removal
- Clearing and grubbing
- Installing Stormwater Pollution Prevention Plan (SWPPP) erosion control measures
- Site grading and sub grade compaction
- Asphalt concrete (AC) surfacing overlay of existing parking lot (2")
- Installing aggregate (6" placed and compacted)
- Installing AC surfacing (4") (compacted)
- Parking lot striping
- Removal and disposal of replaced facilities (toilet building, replacement removed)
- Installing double-vault toilet (accessible)
- Constructing connector trail to Loop 5, approx. 50 feet of new trail
- Installing concrete walkway (accessible)
- Installing bulletin board and signing
- Replacing picnic tables
- Installing bearproof garbage cans
- Relocating existing rock barriers
- Purchasing and placement of new rock barriers
- Installing unloading ramp (concrete)

Construction equipment would include an excavator (14 days), a dozer (three days), a compactor (five days), a chipper (three days), a log truck (one day), two dump trucks (five days), a paver (three days), a water truck (five days), a backhoe (14 days), and seven tractor trailer belly dumps (ten days). Construction would require two log truck trips, five dump truck trips, and 150 trailer belly dump trips. Equipment and materials would be stored on site in the existing staging area. Some materials would be delivered in phases. The China Wall SA would be closed to the public during project construction.

Site Preparation. The China Wall SA Expansion would require the removal of approximately 200 trees, mostly Jeffrey pines (*Pinus jeffreyi*) and ponderosa pines (*Pinus ponderosa*) but a few white firs (*Abies concolor*) would also be removed. The trees to be removed range in size from 6 inches dbh to 24 inches dbh, with an average of about 16 inches. Trees would be felled onsite, and vegetation slash (tops and limbs) would be chipped and spread on adjacent areas as mulch for sediment reduction and soil protection. Tree boles would be decked in an area for the public to access for fuel wood. Stumps would be ground up and used on site as mulch and or be hauled off to be disposed of or used elsewhere.

The expanded staging area would require minimal cut and fill. It’s expected to be balanced on site, with no need to haul off material or transport fill in.

Drainage work and outsloping for storm water runoff would be incorporated into the final grading of the expanded staging area and the repaved section. Storm water and snow melt runoff would

be directed to adjacent level forested areas away from any drainages. There are no adjacent bodies of water, streams or creeks.

2.5.2 Loops 5 and 6 Reroutes

TNF plans to begin constructing the Loops 5 and 6 Reroutes in fall 2026 and complete the project by fall 2027, but flagging the reroutes would begin in the spring of 2025 and review of the reroutes by Forest Service specialists would begin in the spring of 2026. Trails would be constructed with a small trail dozer (18-24" width), a micro-excavator, and hand construction methods. An air viper air compressor and tracked Honda carrier/toter would also be used if rock needs to be chiseled. Equipment would be staged at the job site as the trail construction progresses. Other project materials would be staged at ARRD work center in Foresthill.

Most trees along the trail reroutes would be retained as the trails are designed to avoid trees. However, some hazard tree (standing dead tree) removal would be required, particularly in burned areas.

2.6 STANDARD MANAGEMENT REQUIREMENTS AND TRAIL CONSTRUCTION STANDARDS

2.6.1 Standard Management Requirements

The standard management requirements from the OHV SA and Expansions EA (USFS 2013) and the Big Sugar Project EA (USFS 2019) are listed in Table 2-1 and are incorporated into the project. These requirements will be part of the contract stipulations for project construction. The requirements were reorganized in this document to correspond to CEQA topics, but the underlined subheadings in the table correspond to the titles in the EA.

Table 2-1. Standard Management Requirements Incorporated into the Project

OHV SA and Expansions EA	Big Sugar Project EA
Aesthetics	
<u>Scenery Resources</u> • Flush cut stumps that are visible at eye level from the roadway. Stumps shall be as close to the ground as possible and no higher than 6 inches except where ground conditions and rocks make this requirement impossible. In these cases stump heights will be as low as possible considering obstacles and safety.	<u>Recreation and Visual Resources</u> • **R1:** Construct trail tread by hand, or with small mechanized trail equipment, or a combination of the two. Construct trail tread at a width no greater than 36 inches, most commonly ranging from 18 to 24 inches. • **R2:** Incorporate rolling dips and/or reverse grades into the construction of the trail segments averaging around 100-foot spacing to ensure long-term drainage control. • **R3:** At drainage crossings, move the spoils from trail construction away from the drainage to prevent entry into the waterway. • **R4:** Minimize cut and fill slopes and cover with slash and forest duff to hide contrast of exposed soil. • **R5:** At trailheads and near narrow precipitous segments, increase monitoring of use and install safety signage to educate and inform users.

OHV SA and Expansions EA	Big Sugar Project EA
	• **R6:** Utilize native timber and rock materials when additional trail building materials are needed or use materials that match the color and texture of native materials.
Agriculture / Forestry Resources	
Silviculture • Apply a borate compound to all cut conifer stumps.	None
Biological Resources	
Wildlife • Incidental detections of federally-listed and sensitive species prior to or during project implementation will be reported to the District Wildlife Biologist for development of a recommendation regarding for to protect a discovered TES species in accordance with management direction for the TNF. • Do not spread chipped materials south of the Old Hollow Log (Forest Service 10-12) Road to protect known occurrence of *Allium sanbornii sanbornii*. • Maximize protection of non-activity vegetation during tree removal and slash treatment. Noxious Weeds • Develop a mitigation plan for any known and discovered occurrences prior to implementation. • Clean all equipment that operates off roads before it enters the project area if it is coming from areas infested with noxious/invasive-exotic weeds (see TNF Weed S&G booklet-FY 2001 and Regional Noxious Weed Management Strategy). • Clean equipment that is operating off roads before it moves from an infested area within the project to another area (within or outside the project area). • Monitor project area for invasion of new noxious weeds at least two years after project, report any increase or newly detected noxious species to the District noxious weed coordinator, and evaluate the need for further action (emphasize eradication of new, small	Botanical Resources[2] • **BR3: Sierra bluegrass (*Poa sierrae*).** Occurrences of Sierra bluegrass are known along the Loop 5 reroute and decommission. **-**Flag these areas in the field and identify on project maps. -Botanist must be onsite during ground disturbing activities to assist with trail alignment to minimize damage to plants. -Do not regrade or cause other ground disturbance during decommission of roads and trails. • **BR4: Serpentine Watchlist Species**. VanZuuk's morning glory (*Calystegia vanzuukiae*) and Sanborn's onion (*Allium sanbornii var. sanbornii*). -Identify these (known) areas on project maps. Due to the large area and extent, these occurrences will not be flagged in the field. -Limit ground disturbance to trail prism of 10 feet. -Do not locate staging areas in known occurrences. • **BR6: Survey.** Additional surveys are needed if trail adjustments are outside of a 50-foot buffer from the originally proposed route. Aquatic Wildlife • **AW1: Barriers.** Ensure that materials used at stream crossings do not create barriers to upstream or downstream passage for aquatic-dependent species. • **AW2: Riparian.** Where possible retain as much riparian vegetation canopy so that activities will not adversely affect water temperatures required for local species.

[2] Measures BR1: Hutchinson's lewisia (*Lewisia kelloggii* ssp*. hutchisonii*), BR2: starved daisy (*Erigeron miser*), and BR5: Layne's butterweed (*Packera layneae*) from the Big Sugar Project EA were not included because these species are not expected to occur in the project area due to a lack of suitable habitat and/or known nearby occurrences (they occur in other project areas covered in the EA).

OHV SA and Expansions EA	Big Sugar Project EA
infestations that are high risk for noxious weed expansions). • Ensure that all plant material used for erosion control and/or road maintenance is weed free (including straw and mulches as well as propagative parts such as seed).	• **AW3: Hazardous spills.** Any hazardous spill event into the water shall be immediately contained and reported to the Forest Service dispatch. • **AW4: Survey.** -Survey all proposed water drafting locations for sensitive and listed amphibians and receive approval from a biologist prior to use. Use drafting devices with 2-mm or less screening and place hose intake into bucket in the deepest part of the pool. Use a low velocity water pump and do not pump ponds to low levels beyond which they cannot recover quickly (approximately one hour). **-**Survey where equipment travels through stream habitat for OHV trail work (such as the trail reroute and bridge construction) these areas shall be surveyed for Western pond turtle (WPT) and Foothill yellow-legged frog (FYLF) by qualified USFS personnel just prior to starting work to avoid crushing. • **AW5: Sightings.** If a sensitive or listed amphibian or reptile is sighted within the project area, inform a Forest Service aquatic biologist of the sighting immediately. • **AW6: Tightly woven fiber netting** or similar material shall not be used for erosion control or other purposes within suitable habitat (82-foot buffer) to ensure Sierra Nevada yellow-legged frogs (greater than 4,500 feet in elevation), do not get trapped, injured or killed. Plastic mono-filament netting or similar material shall not be used at any of these projects because individuals may become entangled or trapped in it. • **AW7: Drafting in fish-bearing streams.** The water drafting rate should not exceed 350 gallons per minute (gpm) for streamflow greater than or equal to 4 cubic feet per second (cfs) nor exceed 20 percent of surface flows for streamflow less than 4 cfs. For non-fish-bearing streams, the drafting rate should not exceed 350 gpm for streamflow greater than or equal to 2 cfs, nor exceed 50 percent of surface flows. Water drafting should cease when bypass surface flows drop below 1.5 cfs on fish-bearing streams and 10 gpm on non-fish-bearing streams (USFS Region Five BMP 2.5). • **AW8: California red-legged frog habitat below 4,000 feet**. -Minimize the risk of activity-related sediment entering aquatic systems and minimize impacts to habitat for aquatic- or riparian-dependent plant and animal species.

OHV SA and Expansions EA	Big Sugar Project EA
	-In suitable California red-legged frog (CRLF) habitat, routes avoid Riparian Conservation Areas except where necessary to cross streams. Crossing approaches get the riders in and out of the stream channel and riparian area in the shortest distance possible while meeting the gradient and approach length standards. -Routes or areas do not cross any stream or waterbody within 500 feet of known occupied sites of CRLF; and route or area is not within a distance of 500 feet from wetlands (i.e., springs, wet meadows, ponds, marshes). -In habitat occupied by CRLF, routes or areas do not have the potential to capture or divert stream flow. The approaches to stream crossings are down-sloped toward the stream on both sides. -No routes are within Critical Aquatic Refuges for CRLF. -Mechanical work will not occur within 300 feet of suitable habitat for CRLF (e.g., intermittent or perennial streams, ponds, springs, and seeps) during the wet season (defined as starting with the first frontal rain system that deposits a minimum of 0.25 inches of rain after October 15 and ending April 15). <u>Terrestrial Wildlife</u> • **TW1: Northern goshawk and California spotted owl.** To protect nesting northern goshawk and California spotted owl, no mechanized trail construction or chainsaw use will occur between February 15 and September 15 in the following general areas containing Protected Activity Centers (PACs): Mitchell Mine, Mumford Bar, Shirttail Creek, and Robinsons Flat, unless surveys determine they are not nesting. • **TW2: Bats.** Report any mine openings identified during project layout or trail construction to a wildlife biologist. Limit trail construction within 500 feet of mine openings whenever possible. • **TW3: Threatened, Endangered, and Sensitive species.** Immediately report any detections of threatened, endangered, or sensitive (TES) species during project implementation to the District Wildlife Biologist. Any new detections would be reviewed and considered for additional protective measures. • **TW4: Large trees and logs.** Locate trails to avoid cutting large trees, trees with evidence

OHV SA and Expansions EA	Big Sugar Project EA
	of wildlife use (e.g., cavities, nests, etc.), large snags, and large downed logs. <u>Invasive Plants[3]</u> • **IP1: Flag and avoid** known invasive plant infestations in the project area. Avoid ground disturbance (including decommissioning), staging, and machinery access. Currently known infestations include: 051754CESTM00017, 051754CHJU000005, 051754CHJU000006 on Codfish (Loop 6) trail. New infestations may be discovered in the project area prior to implementation, check with the botanist prior to implementation for current avoidance areas. • **IP2: Equipment Cleaning.** All equipment and vehicles (Forest Service and contracted) operating off-road must be free of invasive plant material before moving into the project area. Equipment will be considered clean when visual inspection does not reveal soil, seeds, plant material or other such debris. Cleaning shall occur at a vehicle washing station or steam-cleaning facility before the equipment and vehicles enter the project area. • **IP3: Pre-implementation treatment.** Treat all infestations that intersect ground-disturbing activities, at least 30 days prior to implementation, project leader will coordinate invasive plant treatment with the District Botanist or their designated appointee. • **IP4: Project-related disturbance.** Minimize the amount of ground and vegetation disturbance. As necessary, reestablish vegetation on disturbed bare ground to reduce invasive species establishment; revegetation is especially important in staging areas. • **IP5: Weed-free construction materials.** All gravel, aggregate, fill, mulch, topsoil, erosion control materials and other construction materials are required to be weed-free. When possible, use onsite materials, unless contaminated with invasive species. Otherwise, obtain weed-free materials from sources that have been certified as weed-free. • **IP6: Early Detection.** Any infestations discovered prior to or during project implementation should be flagged and avoided. Report new infestations to District Botanist.

[3] These measures have been modified slightly from the EA to remove information not relevant to the Loops 5 and 6 reroutes.

OHV SA and Expansions EA	Big Sugar Project EA
	• **IP7: Post Project Monitoring**. For projects involving ground disturbance or use of imported materials, notify the District Botanist after the project is completed, so that the project area can be monitored for invasive plants subsequent to project implementation (as funding allows). • **IP8: Survey.** Additional surveys for invasive plants are needed if trail adjustments are outside of a 50-foot buffer from the originally proposed route.
Cultural Resources	
None	<u>Cultural Resources</u> • **CR1: Management of Sites.** Protect cultural resource sites designated on the ground with flagging and identified on maps provided by the cultural resource specialist. If any new cultural resources are discovered during project implementation, cease operations in the area of new discovery until adequate protection measures are agreed upon. No tracked equipment shall be operated off of existing Forest System Routes within cultural resource site boundaries. Rubber tired equipment may be allowed within specific areas of sites, only with written approval of the Heritage Program Manager. Cultural resource sites shall not be used for work camps, staging areas or for parking vehicles and equipment. Proposed work camps, staging areas, and off road access routes need to be cleared by the District Archaeologist prior to use. • **CR2: Management of Linear Features.** Designated breaches may be used to cross linear features. New breaches may be designated by the District Archaeologist in accordance with Regional Programmatic Agreement Regarding Compliance with Section 106 of the National Historic Preservation Act (Regional PA 2018). Trees should be directionally felled parallel to or away from linear features. Isolated trees inside of linear features may be felled on a case-by-case basis and with on-the-ground approval of the District Archaeologist, only if removal benefits the feature. • **CR3: Additional Survey.** Prior to implementation, additional surveys for cultural resources may be required for areas of proposed ground disturbance outside of the current area of potential effect (such as

OHV SA and Expansions EA	Big Sugar Project EA
	landings, staging areas, or trail route adjustments). • **CR4: System Trail Work within Sites.** Routine maintenance and repairs of Forest System Trails may be conducted within cultural resource site boundaries within the existing trail prism. Adjacent or surrounding cultural resource site areas will be flagged for avoidance during trail work implementation. Installation of trail closures, trail obliteration or trail construction outside the existing trail prism may be conducted within cultural resource site boundaries only upon written approval of the District Archaeologist, and only when the proposed work benefits the site. • **CR5: Non-System Trail Work within Sites.** It is preferred that non-system trail work avoids cultural resource sites. Reconstruction or obliteration of non-system trails within cultural resource sites may be conducted only with written approval of the District Archeologist, and only when the proposed work benefits the site. Adjacent cultural resource sites will be flagged for avoidance during non-system trail work implementation.
Geology and Soils, Hazards and Hazardous Materials, and Hydrology and Water Quality	
<u>Watershed, Soils, and Aquatic Resources</u> • Allow temporary refueling and servicing only at approved locations, which are 300 feet away from water or riparian resources. • Develop or use existing fuel and chemical management plans (for example, spill prevention control and countermeasures (SPCC), spill response plan, emergency response plan) when developing the management prescription for refueling and servicing sites. • Staging for proposed restoration activities would take place from adjacent NFS roads or compacted surfaces to be restored. • Timing of operations – Operate equipment within riparian conservation areas (RCAs) late in the season when stream flows are at a minimum and soil conditions are dry. All disturbed areas would be stabilized by appropriate soil stabilization measures by October 15th of each year. • Control of Operations – Stop operations during periods of inclement weather and implement temporary erosion control measures, as needed, until the site is dry enough to resume work and there is no potential for off-site sediment transport.	<u>Watershed, Soils and Aquatic Resources</u> • **WSA1: Shallow stream fords.** When constructing shallow stream fords, locate in shallower portions of the stream. The approaches should climb a short distance above the typical high water line so water is not channeled down the tread. Avoid locations where the stream turns, because the water will undercut approaches on the outside of a turn. The tread in the ford should be level, ideally made of rock or medium sized gravel that provides solid footing. The objective is to even out the waterflow through the ford so the gravel-sized material is not washed away, leaving only cobble or boulders. • **WSA2: Trail approaches to watercourse crossings.** Design watercourse crossings to avoid diversion of flow down the trail should the crossing fail. **-**Where possible, make crossing approaches short and level, or reverse the grade if possible. **-**Install cross drainage (cut-off waterbreaks) at crossings to prevent water and sediment from being channeled directly into watercourses.

OHV SA and Expansions EA	**Big Sugar Project EA**
• Control of concentrated runoff – Contour all work sites to allow for natural sheet flow and infiltration into the soil. Do not concentrate flow. Place woody material on bare soil where appropriate. • Ensure an Erosion Control Plan is in place prior to implementation. • Dust abatement measures, such as watering, will be taken as necessary to control dust during parking lot expansion/construction.	**-**Locate cut-off waterbreaks as close to the crossing as possible without being hydrologically connected to the watercourse. -Armor steep crossing approaches with stable aggregate or trail-hardening materials. -Where possible (for example, at bridges or arch culverts), reverse the grade of the crossing approaches so runoff drains away from the watercourse. • **WSA3: Trail decommissioning.** Administratively close decommissioned trail sections to continued use. **-**Block access to and obscure the first 100 to 300 feet of the old trail at intersections with the new reroutes and place woody debris (no greater than 12 inches in height) on them to discourage any further use. Utilize regrading, bouldering, and covering regraded area with slash and forest duff as necessary. -Scarify top 2 to 4 inches of soil to promote water infiltration and return of vegetation. Maintain at least 70 percent effective soil cover prior to winter precipitation. If soil cover cannot be recruited on site, use biodegradable geotextile netting or a thick cover of weed free straw. • **WSA4: Trail drainage.** Look for small draws to locate grade reversals. The trail should climb gently for a few feet on each side of the draw. Construct a trail grade that is less than half of the sideslope grade. For example, on a hill with 6-percent sideslope, trail grade should be no more than 3 percent. • **WSA5: Region 5 Best Management Practices and Trail Construction, Reconstruction and Maintenance standards.** Follow the Trail Construction Standards described in the Tahoe NF Trail Design Standards document and BMPs listed in the Region 5 Soil and Water Conservation Handbook, chapter 10, sections 4.7.1 to 4.7.8. Follow BMP 2.13 to effectively limit and mitigate erosion and sedimentation from any ground-disturbing activities. Develop an erosion control plan to include mitigation measures, requirements to meet BMPs, specifications and permits.
Wildfire	
None	<u>Fire and Fuels</u> • **FF1: Leave access** for fire suppression resources along roads and trails. • **FF2: Excess cut woody material:** scatter, chip, remove or pile.

OHV SA and Expansions EA	Big Sugar Project EA
	• **FF3: Build piles** no larger than 10 feet high by 10 feet wide. Cover at least one 16 square foot segment of each pile with weatherproof sheeting to facilitate ignition during all seasons. Cover must be well secured and accessible. Construct appropriate control line around pile areas to be burned.

2.6.2 Trail Construction Standards

In addition to the standard management requirements in Table 2-1 above, the following trail construction standards from the Big Sugar Project EA (USFS 2019) are incorporated into the project.

General Standards

Trail work will occur through the use of hand work or by qualified machine operators approved by USFS. Any trail work other than standard maintenance will be approved by the ARRD Trails Officer prior to commencement. As much as possible, mechanized trail equipment is planned (a small trail dozer/mini-excavator with a 4-foot disturbance for ATV designated trails and a trail dozer/micro excavator with a 2-foot disturbance for motorcycle designated trails, trees would be avoided where possible and cutting would be kept to a minimum.) On routes not used for events, the trails would be given time to settle during the winter season prior to being used. On event routes, trail reroutes would be constructed over a period of years and then, after construction is completed, the reroutes would be opened and the unsustainable alignments would be closed concurrently.

- Average Grade Pitch: 5 percent (within approximately 100 feet or overall segment) grade reversal every 100 to 200 feet
- Moderate duration pitches (50 feet): 15 percent max, include grade reversal or out-slope feature
- The intent on pitch limiters is to create sustainable trail, volume of usage, soil or surface type; hydrology and user types may affect design standards. Steeper segments may be approved with hardened bench elements.
- Bench Width: 24 to 36 inches
- Clearance from trail center: 30 inches for general obstructions
- Brush removal from trail center: 5 feet
- Height clearance: 7 feet

Guidelines for preventing Resource Damage

- Build on side slopes
- Avoid ridge-top or fall line alignments
- Stay out of meadows or flatlands where drainage is poor
- Favor the upslope of trees to prevent root damage
- Build mild, undulating trail alignment that utilizes frequent grade reversals
- Out-slope bench when possible
- Camber outside of turns to minimize lateral wear
- Avoid over-pitch alignments

- Create good sight lines
- Design intuitive trail alignments

Creek or ephemeral drainage crossings

- Locate crossings at stable locations
- Trail at crossing should always be at least 12 or more inches lower than approach from either side
- Harden active crossings with cobbled rock to minimize creek disturbance
- If a bridge is used, construct so freeboard is above 100-year mark
- If bridge footings are within 100-year mark, embed into embankment 2 feet or more to avoid high water scouring

Switchbacks or Rolling Berms

- Provide grade reversals within 50 feet of both sides of turn and stage so that lower grade reversals catch upper drainage runoff
- Rolling turns have radiuses in excess of 4 feet trail center and occur on slopes which are less than 30 percent
- Switchbacks have radiuses of less than 4 feet trail center and occur on slopes greater than 30 percent
- Anticipate approaches to turns and design speed reduction to eliminate skid bumps
- Keep overall switchback radius bench at 5 to 10 percent max to minimize wear
- If cambering turn, leave flat climbing radius towards center
- Locate turn in spot that limits short cutting
- Separate trails from each other as early as possible

Rolling dips, Grade Reversals or Drain Dips

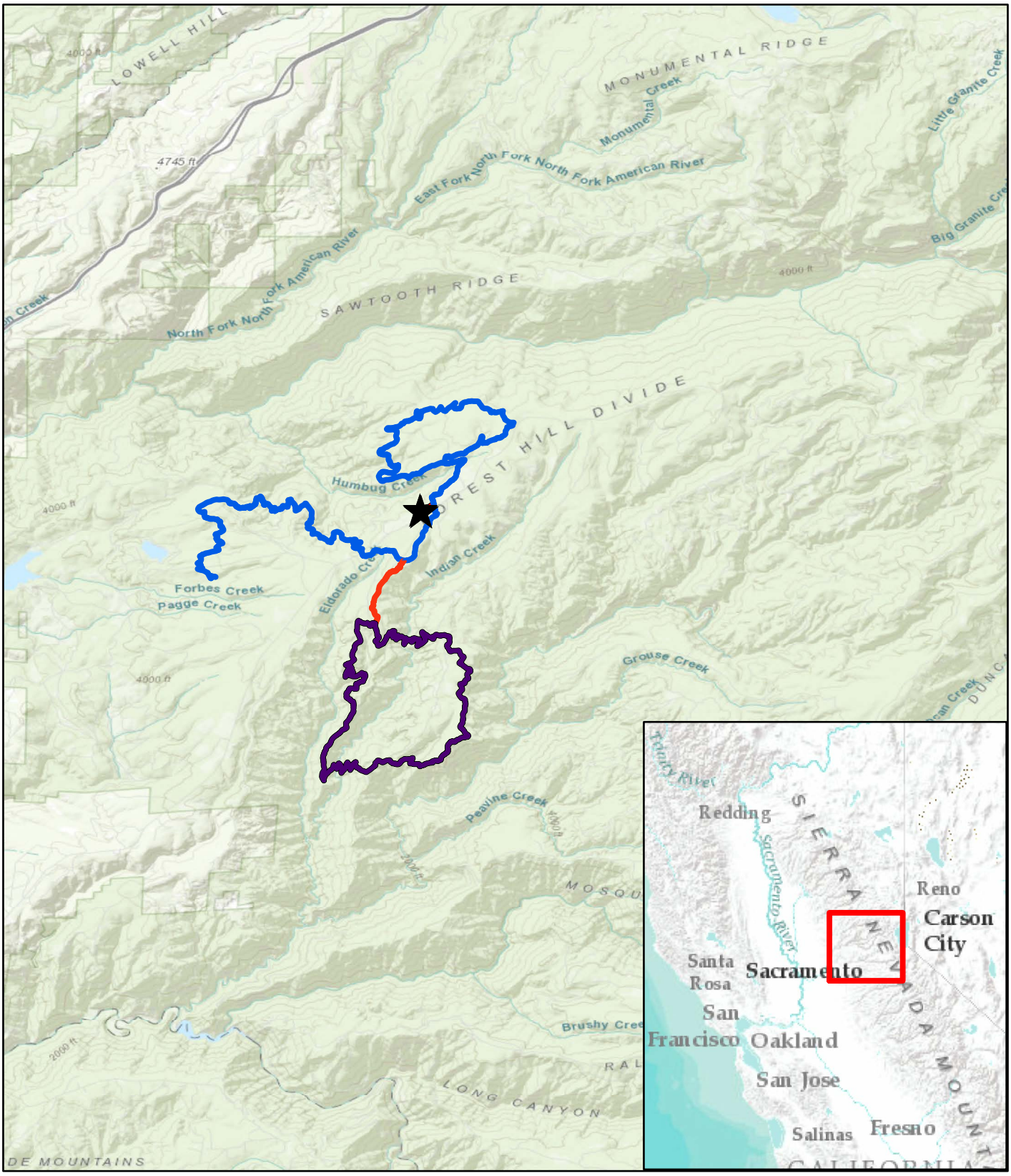
- Downhill rise should be 6 to 12 inches above low point
- Features should be 10 to 20 feet in length for smooth transitions
- Place at all ephemeral (rarely active) or seasonal drainages

Bermed Turns

- Confirm all turns drain by splitting or tilting the turn on the slope
- Leave un-cambered inside space for hiking or uphill riding
- Evaluate safety and confirm berm is free of encroaching hazards like trees or rocks

2.7 REQUIRED PERMITS AND APPROVALS

Proposed state funding of the project requires approval by the OHMVR Division. The proposed project would occur on national forest land and has been approved by the USFS in two NEPA EAs (USFS 2013 and USFS 2019). No other permits or approvals are required for this project.



Legend

- China Wall Staging Area
- Loop 5
- Loop 6
- Loop 5 and 6 Connector

0 1 2 4 6 Miles

N

Figure 2-1 Project Location

USFS Tahoe China Wall OHV Staging Area Expansion / Loops 5 & 6 Reroutes

MIG

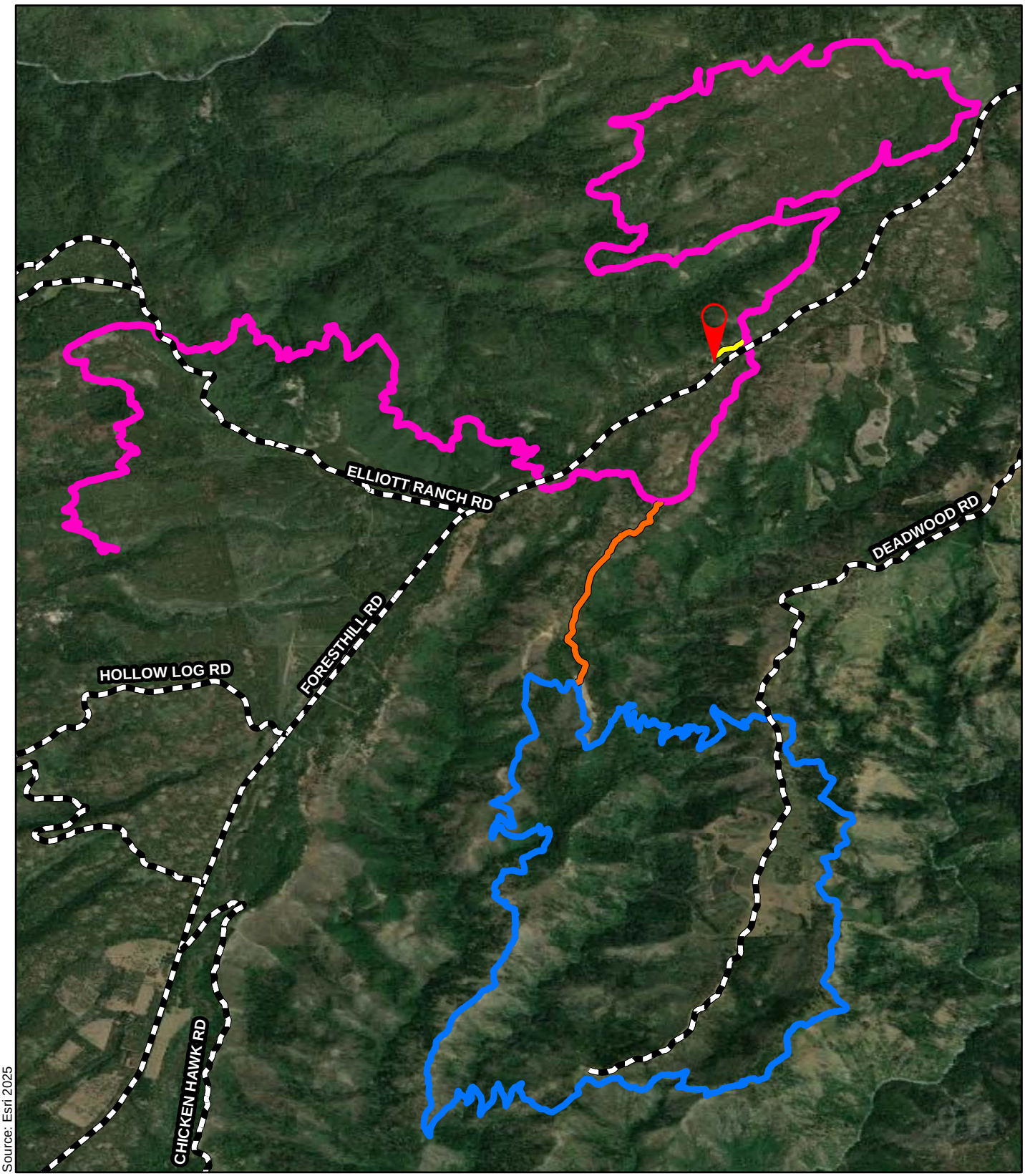


Figure 2-2 China Wall Staging Area and Loop 5 and 6 Vicinity

USFS Tahoe China Wall OHV Staging Area Expansion / Loops 5 & 6 Reroutes

Figure 2-3. Photographs of the China Wall OHV Staging Area

Photo 1. Looking north at China Wall SA from the center of the staging area.

Photo 2. Looking south at China Wall SA from the south side of the staging area.

Photo 3. Looking west at the existing restroom and kiosk at China Wall SA.

Photo 4. Looking west from the proposed expansion area towards the existing China Wall SA.

Figure 2-4. Photographs of Loops 5 and 6

Photo 1. Looking east at the Loop 5 trailhead from the northern part of China Wall SA.

Photo 2. A steep section of Loop 5 proposed for rerouting (~1 mile southwest of China Wall SA).

Photo 3. A steep section of Loop 6 proposed for rerouting (~3 miles southwest the China Wall SA). This area was burned in the Mosquito Fire in 2022.

Photo 4. A section of Loop 6 along Mitchell Mine Road proposed for rerouting off of the road (~2 miles southwest of China Wall SA).

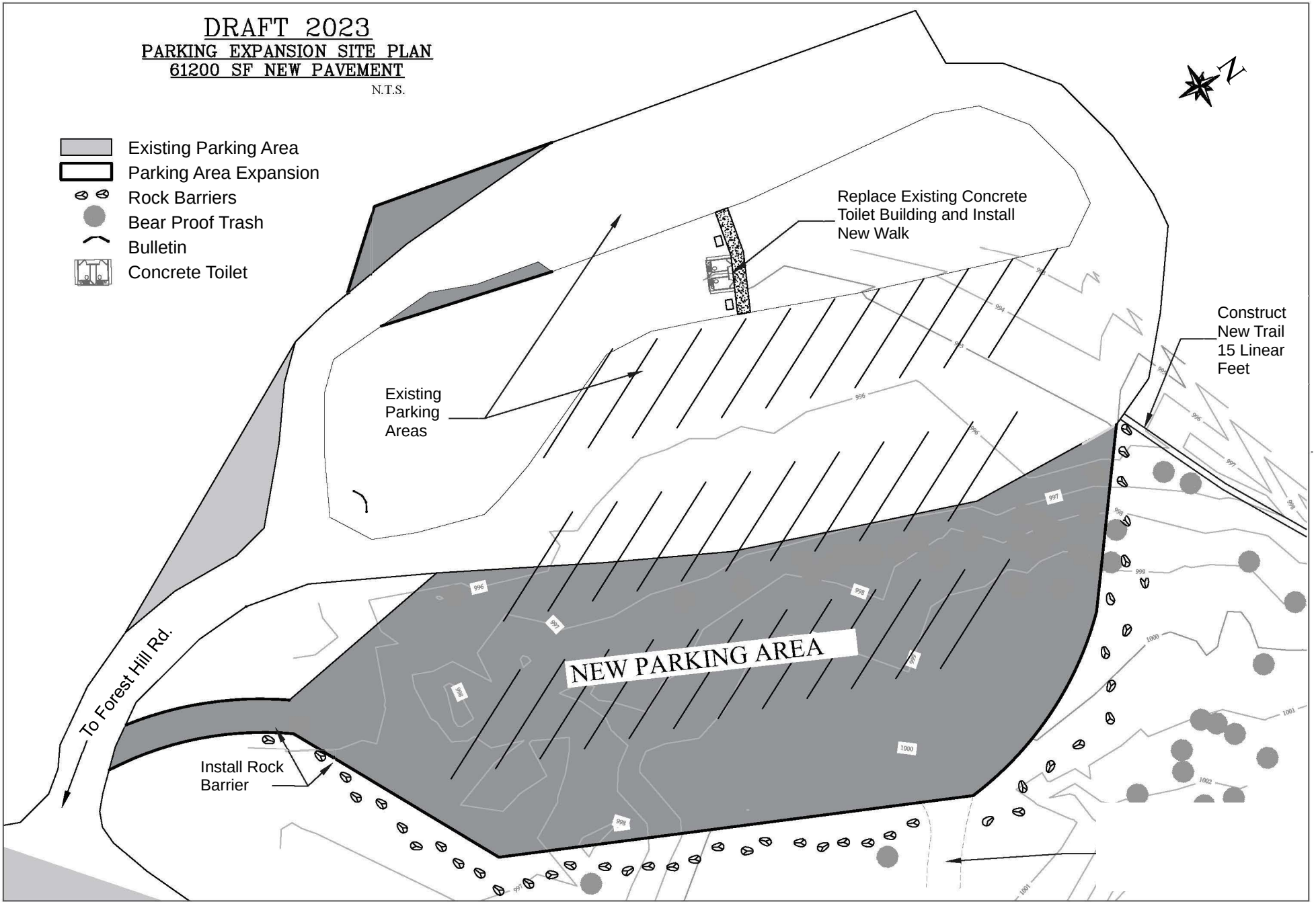
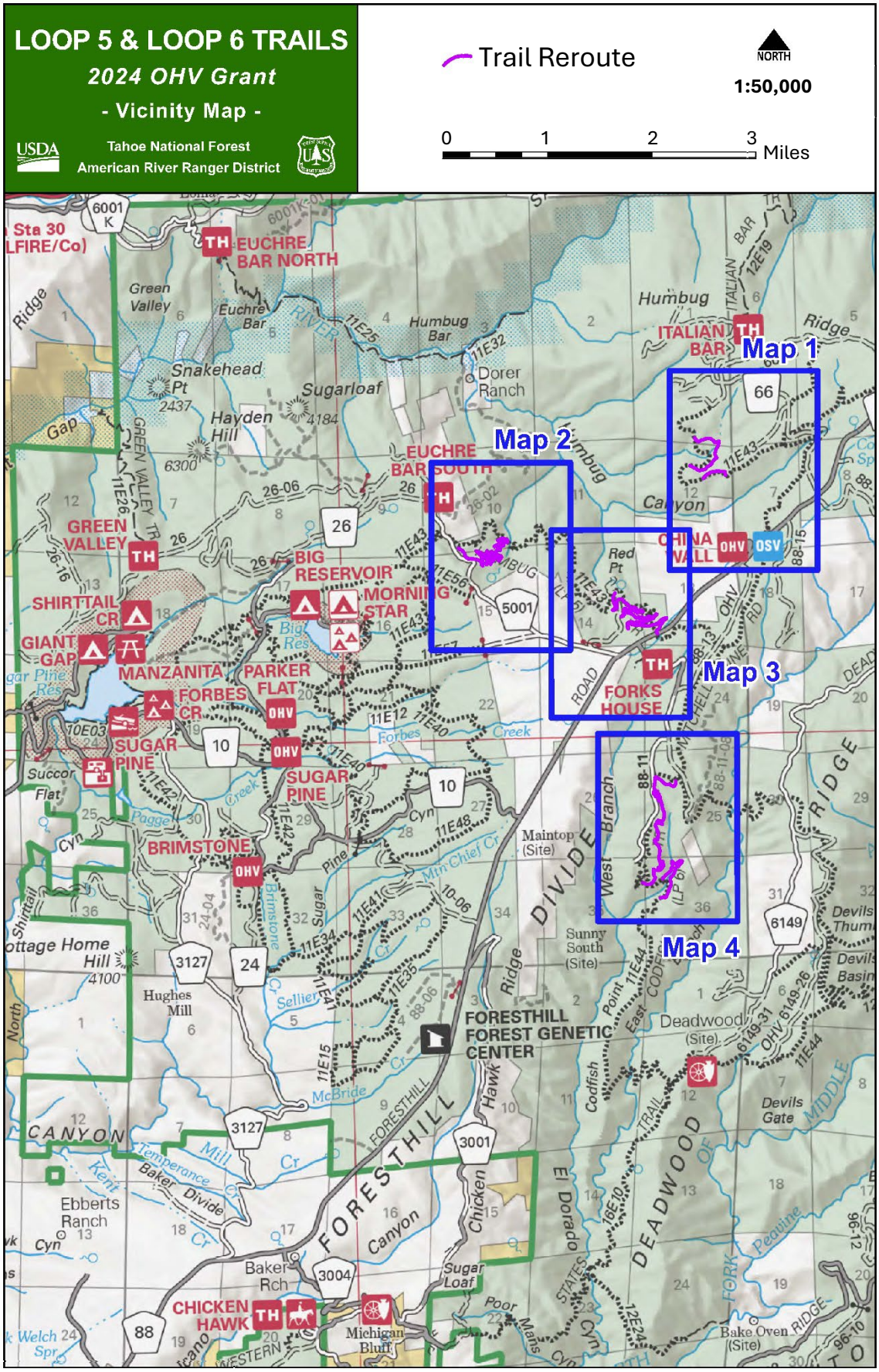


Figure 2-5 Site Plan

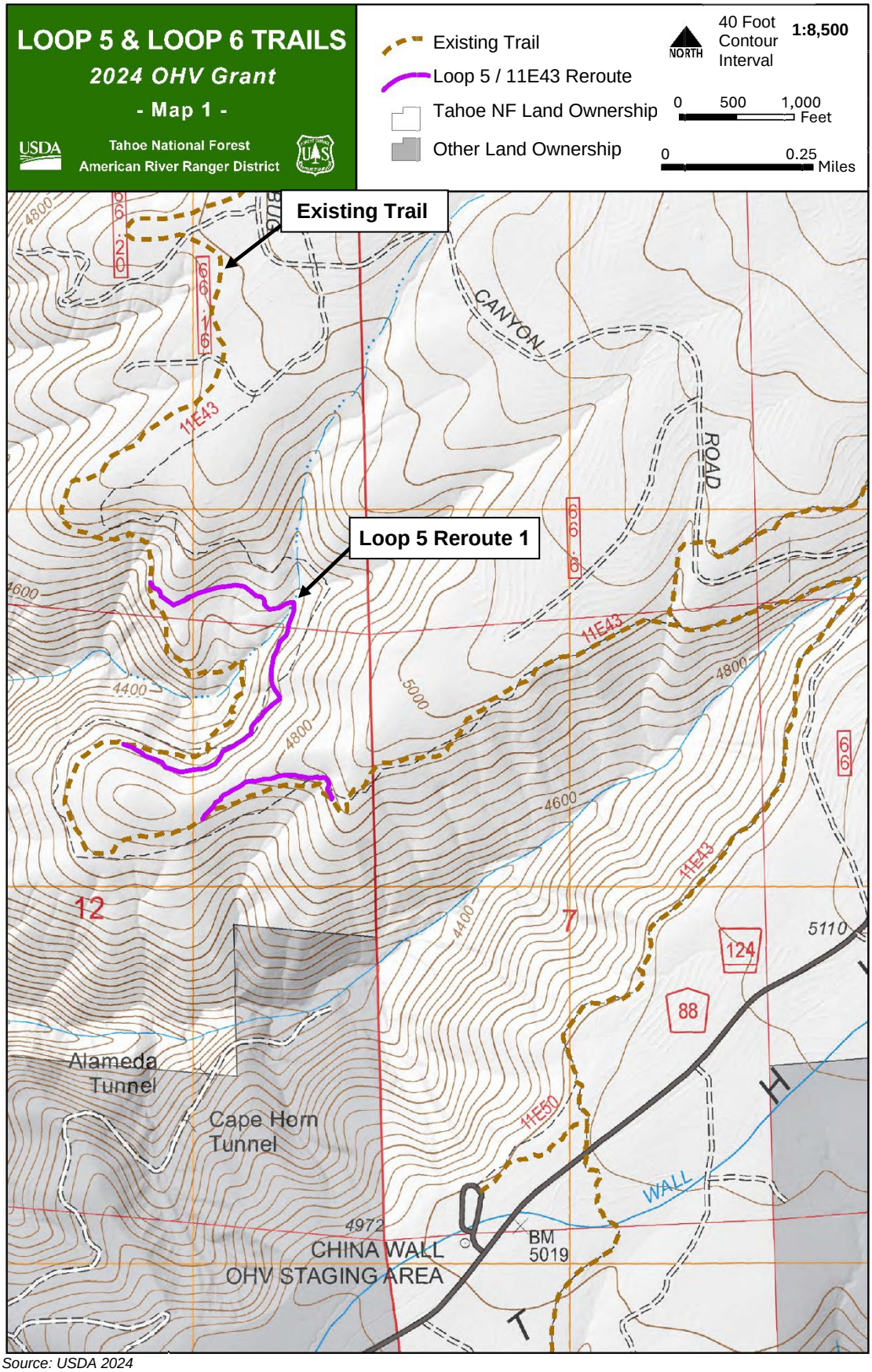
USFS Tahoe China Wall OHV Staging Area Expansion / Loops 5 & 6 Reroutes



Source: USFS 2024

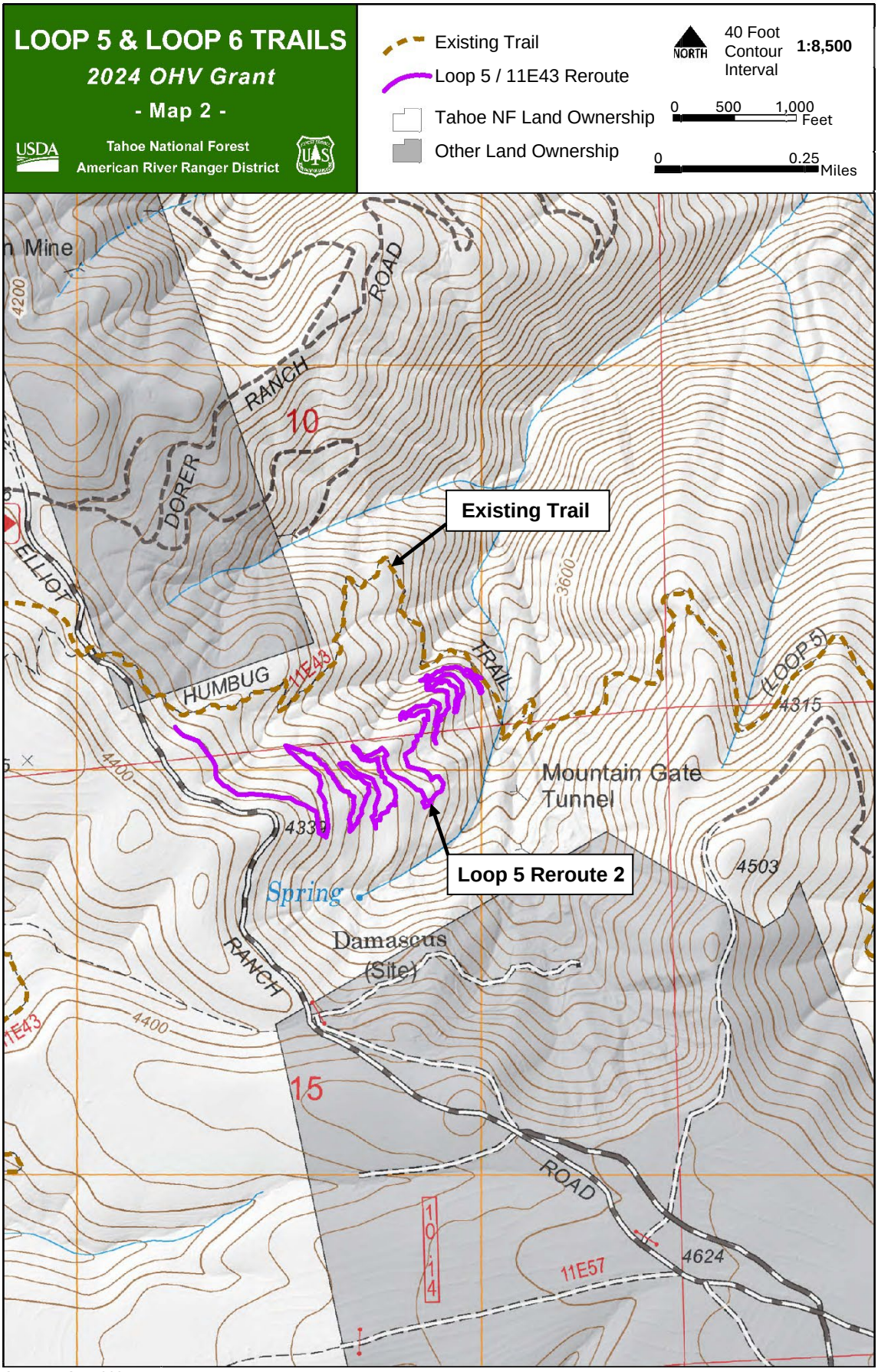
Figure 2-6 Loop 5 and 6 Reroutes Overview

USFS Tahoe China Wall OHV Staging Area Expansion / Loops 5 & 6 Reroutes



Source: USDA 2024

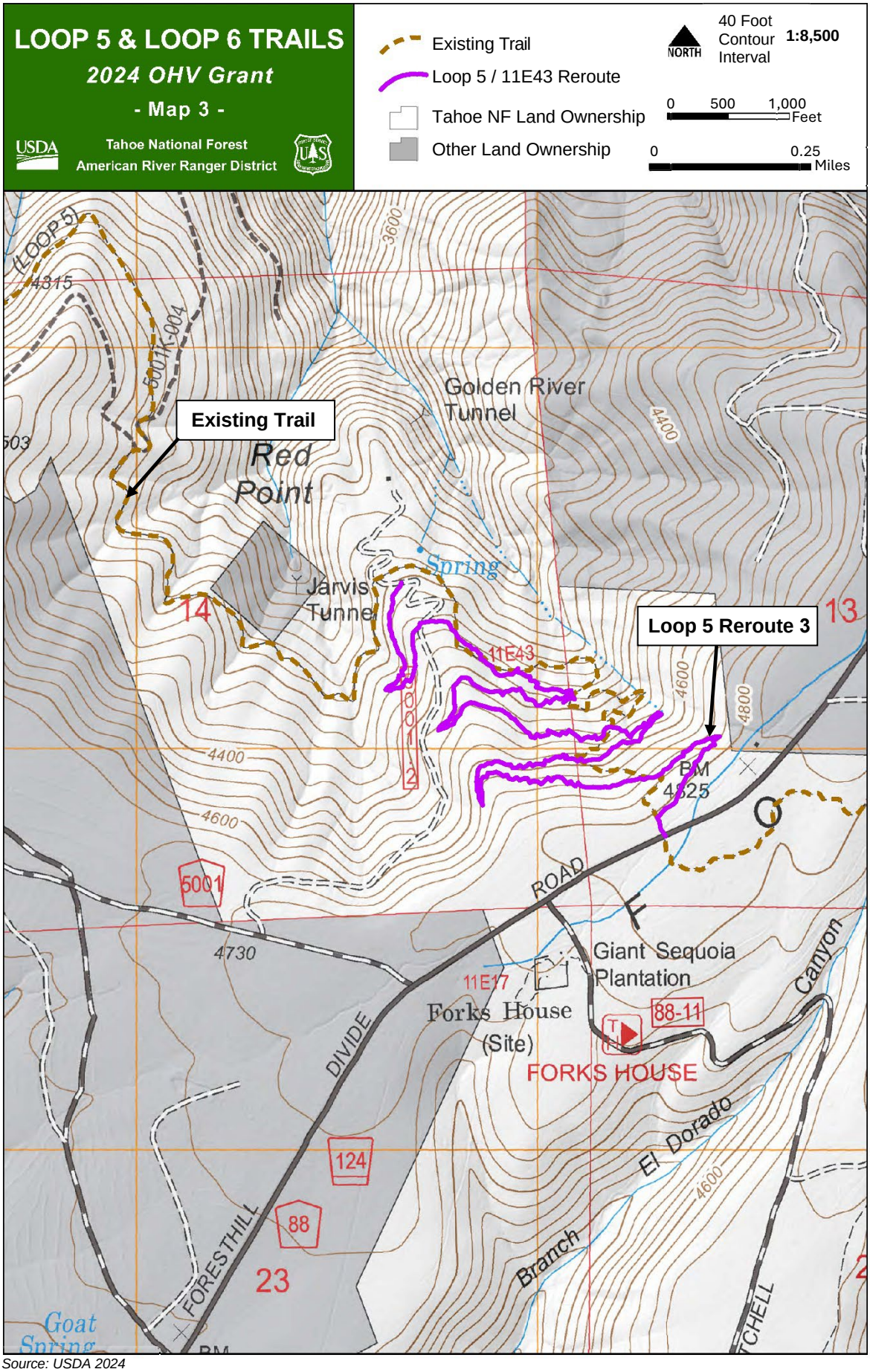
Figure 2-7 Map 1: Loop 5 Reroute 1



Source: USDA 2024

Figure 2-8 Map 2: Loop 5 Reroute 2

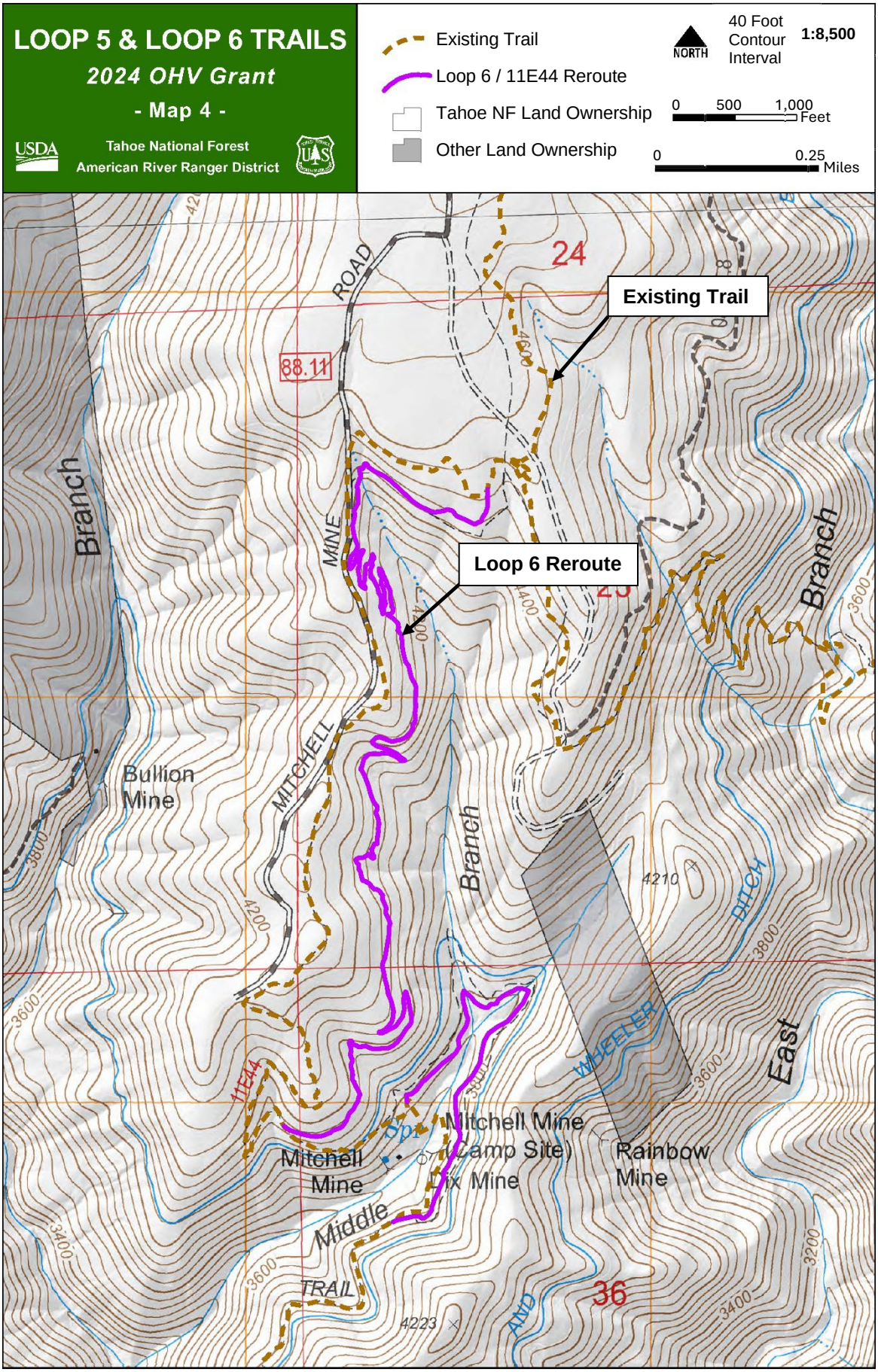
USFS Tahoe China Wall OHV Staging AreaExpansion / Loops 5 and 6



Source: USDA 2024

Figure 2-9 Map 3: Loop 5 Reroute 3

USFS Tahoe China Wall OHV Staging AreaExpansion / Loops 5 and 6



Source: USDA 2024

Figure 2-10 Map 4: Loop 6 Reroute

USFS Tahoe China Wall OHV Staging AreaExpansion / Loops 5 and 6

Chapter 3. ENVIRONMENTAL CHECKLIST AND RESPONSES

PROJECT INFORMATION

1. **Project Title:** China Wall OHV Staging Area Expansion / Loops 5 and 6 Reroutes

2. **Lead Agency Name and Address:** CDPR, OHMVR Division
P.O. Box 942896
Sacramento, CA 94296-0001

3. **Contact Person and Phone Number:** Scott Soares, Senior Environmental Scientist Supervisor
scott.soares@parks.ca.gov (916) 247-1610

4. **Project Location:** Near Foresthill, American River Ranger District, Tahoe National Forest, Placer County

5. **Project Assessor's Parcel Number:** not applicable

6. **Project Sponsor's Name and Address:** Matthew Brownlee
Tahoe National Forest
American River Ranger District Office
22830 Foresthill Road
Foresthill, CA 95631

7. **General Plan Designation:** As a National Forest the property is owned by the federal government and therefore any general plan designations assigned by the local land use authority do not apply.

8. **Zoning:** not applicable

9. **Description of the Project:** The OHMVR Division proposes to award grant funds to the TNF to expand the existing China Wall OHV Staging Area (China Wall SA) by 61,200 square feet and provide for approximately 24 vehicle/trailer combinations, and to construct six trail reroutes that would replace 4.5 miles of existing unsustainable trail in the Forestville Off-Highway Vehicle (OHV) trail system on Loop 5 and Loop 6. The China Wall OHV Staging Area Expansion (China Wall SA Expansion) would re-pave existing parking areas; pave the expanded area to match existing paved areas; remove and replace the existing and outdated double-unit concrete vault restroom and install one new double-unit concrete vault toilet; install two bear proof garbage cans; construct a connector trail to OHV Loop 5 (11E43), approximately 50 feet in distance; install barriers, such as large boulders, around edge of expanded parking area to restrict use outside and define the boundaries of the expanded area; fall and remove approximately 200 trees; and install additional signage, to include an informational kiosk and directional parking signs. The Loops 5 and 6 Reroutes would re-flag reroute sections and cut the primary corridor; then construct the new trail alignment and divert riders to the newly aligned trail segments using barriers and signage.

10. **Surrounding Land Uses and Setting:** The project site is located within the TNF on Foresthill Road and is surrounded by open forest on all sides. The project site serves as a staging area for OHV and over snow vehicle (OSV) recreation activities and provides access to the trails: 11E44 (Loop 6) and 11E43 (Loop 5), which are designated for use by motorcycles only.

11. **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, has consultation begun?** Sang Bae, Project Associate in the Cultural Places Group at MIG, Inc., sent consultation letters in December 2024 to tribal contacts per CEQA requirements. The Tribes contacted include the Colfax-Todds Valley Consolidated Tribe, Nevada City Rancheria Nisenan Tribe, Susanville Indian Rancheria, Tsi-Akim Maidu of the Taylorsville Rancheria, United Auburn Indian Community of the Auburn Rancheria (UAIC), Washoe Tribe of Nevada and California, and Wilton Rancheria. The Colfax-Todds Valley Consolidated Tribe requested a site visit to the project area and a site visit was conducted on April 22, 2025. During the site visit, the tribal representative (Pam Cubbler) identified areas of cultural sensitivity that may be impacted by the proposed project and proposed mitigation measures of avoidance and additional monitoring (Mitigation Measure TRIB-1, 2). UAIC requested to officially consult under AB 52 and a meeting took place with the Cultural Regulatory Manager of the UAIC, the OHMVR Division contact, and MIG on February 7, 2025. Upon review, the Tribal Historic Preservation Officer determined that a UAIC tribal survey was not warranted. However, the UAIC provided a mitigation measure for standard unanticipated discoveries (Mitigation Measure TRIB-3).
12. **Other Public Agencies Whose Approval is Required:** None

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
X	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	☐	Transportation	**X**	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	**X**	Mandatory Findings of Significance
☐	None				

DETERMINATION*:* (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

X I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the

project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Scott Soares 06/06/2025

Off-Highway Motor Vehicle Recreation Division Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

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 construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in 5. below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. Explanation(s) of each issue should identify:

    a) The criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question; and

    b) The mitigation measures, if any, prescribed to reduce the impact below the level of significance.

3.1 AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	**X**	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	**X**
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	**X**	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	**X**

3.1.1 Regulatory Setting

National Forest Landscape Management Program

The National Forest Landscape Management Program of 1969 was created in response to growing public concerns about the visual resources of national forests. The policy aims to identify and analyze the visual characteristics of landscapes and the visual effects of resource management actions, with the long-term goal of detailed visual resource inventory and interpretation on most National Forest lands (Bacon 1979).

Tahoe National Forest Land and Resource Management Plan

Tahoe National Forest Land and Resource Management Plan outlines visual quality objectives aimed at maintaining the visual quality of the TNF natural Landscape. The objectives Include:

- Retention: Management practices are not evident to the casual observer
- Preservation: only when ecological changes are evident
- Partial retention: management activities are subordinate
- Modification: management practices may dominate the landscape, but activities appear as natural occurrences in the foreground and middle ground.
- Maximum modification: management practices may dominate the landscape, but activities should appear as natural occurrences in the background.

Resource Management Emphasis: Any proposed facility development design will integrate natural scenic qualities and spatial designs consistent with visual management objectives.

State Scenic Highway Program

California's Scenic Highway Program purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. The state laws governing the Scenic Highway Program are found in Streets and Highways Code, Sections 260 through 263 (Caltrans 2019).

Of the four highways that traverse the TNF, the State of California designated portions of State Route (SR) 20 and SR 49 as State Scenic Highways. Portions of SR 49 and 89 and Interstate 80 are designated by local counties as scenic highways and may be submitted to the State for State designation. There are no designated or eligible state scenic highways in the project area (Caltrans 2025).

3.1.2 Environmental Setting

The visual setting of the China Wall SA includes the existing staging area and the surrounding Jeffrey pine (*Pinus jeffreyi*) and/or ponderosa (*P. ponderosa*) pine forest (see photos in Figure 2-3). The existing approximately one-acre staging area is currently developed with a double-unit restroom and paved parking area that can accommodate approximately 20 vehicles, towing trailers, and 10 passenger vehicles. The entrance to the staging area is visible from Foresthill Road, though much of the staging area itself is hidden behind trees and is not visible from the road.

The existing Loops 5 and 6 are narrow motorcycle loop routes surrounded by Jeffrey pine and/or ponderosa pine forest and are steep in the areas proposed for reroute (see photos in Figure 2-4 and maps in Figure 2-6 through Figure 2-10). Much of the area that includes Loop 6 burned in the 2022 Mosquito Fire, and there are many dead standing trees in the area. Small parts of Loop 5 are visible from Humbug Canyon Road and Elliot Ranch Road, and parts of Loop 6 are visible from or travel along Mitchell Mine Road.

3.1.3 Discussion

Would the proposed project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The China Wall SA Expansion and Loops 5 and 6 Reroutes are modifications of existing recreational facilities and would not have a substantial adverse effect on a scenic vista. The China Wall SA is along a ridgeline with canyons on both sides, but views from the staging area are limited to a small area due to the many tall trees on and near the China Wall SA. The higher elevation parts of trail Loops 5 and 6 may provide views of the canyons, though both loops are heavily forested, which limits visibility. The Mosquito Fire has affected the views from the Loop 6 trail, generally making it less scenic due to the standing dead trees.

The China Wall SA Expansion and Loops 5 and 6 Reroutes are not within Granite Chief Wilderness area or the North Fork American Wild and Scenic River corridor. The proposed reroutes are within an existing motorized trail network and would permit motorized use in proximity to the non-motorized North Fork American Wild and Scenic River System, but due to topography of the project area (very steep cross slope where it is close to North Fork American

Wild and Scenic River System), no intrusion is expected. The reroutes would provide scenic views of the North Fork American River Canyon.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The project site is not visible from any state scenic highways; therefore, the proposed project would not damage scenic resources within a state scenic highway. There are no designated or eligible state scenic highways in the project area (Caltrans 2025).

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (Public views are those that are experienced from publicly accessible vantage point)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The China Wall SA and Loops 5 and 6 are open to the public and therefore provide publicly accessible vantage points. The China Wall SA Expansion would convert approximately 1.5 acres of forested area to the expanded China Wall SA, while retaining the existing staging area. However, the 1.5 acre expansion of the China Wall SA is a small area relative to the surrounding forest and would not change the overall visual character or quality of the project area. Most of the China Wall SA is not visible from Foresthill Road, and the project would flush cut stumps that are visible at eye level from the roadway to minimize visual impacts (see Section 2.6.1). Construction impacts on the visual character or quality of the China Wall SA would be short-term, small scale, and screened by trees and therefore less than significant.

The Big Sugar EA (USFS 2019) stated the following regarding the visual effects of the proposed actions, including the Loops 5 and 6 Reroutes:

> Although visual effects will vary, none of the visual effects would be significant, and all of the visual effects would be compliant with the Forest Plan Visual Quality Objectives (VQOs). Proposed actions would be minimally evident (since they consist of trail building or existing trail improvements), would be very small and would be lightly and sustainably placed upon the landscape. Views of proposed actions would primarily be in the immediate foreground by users recreating on existing trails or the trail features being proposed. Some of the proposed actions could be visible for very short periods of time from highly used travelways in immediate foreground views but would be minimally evident to nonexistent in middleground and background views.

Regarding construction impacts on visual resources, the Big Sugar EA (USFS 2019) states:

> The most negative visual effects would occur when trail building or improvements take place. Small trail building equipment, dozers and excavators, construction signage, and increased dust and noise would be evident in the immediate foreground but only for short periods of time (days to weeks at a time.) Evidence of trail grading, cut and fill slopes, rock placing, and decommissioned old trails may be visible in the short term (less than 5 years) and would sufficiently blend into natural surroundings in a few years. Any short term negative impacts would be reduced by implementing recommended Visual Resource BMPs.

Visual Resource BMPs incorporated in the project include constructing trail tread by hand or with small mechanized equipment and limiting the width of the trail to 36 inches or less (R1); moving spoils from trail construction away from drainages (R3); minimizing cut and fill slopes and covering them with slash and forest duff (R4); and utilizing native timber and rock materials when additional trail building materials are needed or using materials that match the color and texture of native materials (R6) (see Table 2-1). With incorporation of these BMPs, the proposed project would not substantially degrade the existing visual character or quality of public views of the project sites and their surroundings.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The proposed project would not include lighting or highly reflective materials and therefore would not create a new source of light or glare.

3.2 AGRICULTURAL AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation (CDOC) as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	**X**
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	**X**
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	☐	☐	**X**	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	**X**	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	**X**	☐

3.2.1 Regulatory Setting

1978 Tahoe National Forest Timber Management Plan

The current timber management program is directed by the 1978 Tahoe National Forest Timber Management Plan. This program was developed considering lands capable of producing more than 20 cubic feet per acre per year and includes direction for harvesting, silvicultural systems, fuelwood, and elimination of current reforestation and timber stand improvement needs. The goals of this plan are to maintain or increase the optimum yields of forest products while maintaining or improving other resource values including recreation (USFS 1990).

National Forest Management Act

The National Forest Management Act (NFMA) of 1976 mandates the U.S. Forest Service to develop comprehensive land management plans for each national forest, ensuring sustainable management of resources like timber, wildlife, water, and recreation by prioritizing multiple-use and sustained-yield principles, while also requiring extensive public involvement and environmental analysis in decision-making processes to protect the long-term health of national forests; essentially aiming to prevent excessive logging and clear-cutting through regulated harvesting practices and careful consideration of ecological impacts. NFMA requires that the Forest Service determine the suitability of National Forest System lands for timber production and has specific requirements for timber suitability analysis in land management plans (Sierra Forest Legacy 2008).

3.2.2 Environmental Setting

The proposed project is in the TNF on forested land. No farmland occurs in the area. Timber harvesting in the TNF serves to manage forest health and reduce hazardous fuels (USFS 2024d). However, the project area is not used for commercial timber production.

3.2.3 Discussion

Would the project:

a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

b. **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

No Impact (Responses a – b). The project is located on USFS land in mountainous areas of the TNF with established recreational and resource management uses. There is no farmland within or near the project area. The project area does not contain any farmland, any lands under Williamson Act contracts, or any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as defined by the California Important Farmland Finder online map (CDOC 2022). The Farmland Mapping and Monitoring Program and Williamson Act do not apply to federal land.

c. **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

d. **Result in the loss of forest land or conversion of forest land to non-forest use?**

Less Than Significant Impact. The project would not conflict with zoning for, or cause rezoning of, forest land or timberland, and would not convert significant areas of forest land to a non-forest use. The China Wall SA Expansion would convert 1.5 acres of forest land to a paved surface and would include the removal of approximately 200 trees. Trees would be felled onsite, and vegetation slash (tops and limbs) would be chipped and spread on adjacent areas as mulch for sediment reduction and soil protection. Tree boles would be decked in an area for the public to access for fuel wood. Stumps would be ground up and used on site as mulch and or be hauled off to be disposed of or used elsewhere. The land surrounding the project site would

remain as forest land. The Loops 5 and 6 Reroutes would avoid tree removal; however, a small number of hazard trees (i.e., dead standing trees) may be removed for safety purposes. The project site is not zoned for commercial timber production; therefore, there would be no impacts to forest lands, timber lands, and timber production. Potential impacts to forest land would be less than significant.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Less Than Significant Impact. The project would expand an existing staging area and reroute existing loop trails. The project would not involve other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to a non-forest use. As mentioned, there is no Farmland in the project area (see response to Questions a and b above), and the project would not convert significant areas of forest land to a non-forest use (see response to Questions c and d above).

3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	**X**
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	**X**	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	**X**	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	**X**

3.3.1 Regulatory and Environmental Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. The physical features and atmospheric conditions of a landscape interact to affect the movement and dispersion of pollutants and determine its air quality. Federal, state, and local governments manage air quality through the implementation of laws, ordinances, regulations, and standards. The federal National Ambient Air Quality Standards (NAAQS) have been established for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), fine particulate matter (particles 2.5 microns in diameter and smaller, or $PM_{2.5}$), inhalable coarse particulate matter (particles 10 microns in diameter and smaller, or PM_{10}), and sulfur dioxide (SO_2). California Ambient Air Quality Standards (CAAQS) are more stringent than the national standards for the some of the pollutants listed above and include the following additional pollutants: hydrogen sulfide (H_2S), sulfates (SO_X), and vinyl chloride.

Mountain Counties Air Basin (MCAB)

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. The project site is located near Foresthill in Placer County within the Mountain Counties Air Basin (MCAB). The MCAB lies along the northern Sierra Nevada close to or contiguous with the Nevada border and covers roughly 11,000 square miles. Elevations range from a few hundred feet at the Sacramento County boundary to more than 10,000 feet above sea level at the Sierra Crest. CARB officially recognizes the MCAB as an area impacted by ozone transport from upwind air basins (17 CCR §70500).

Placer County Air Pollution Control District (APCD)

The Placer County APCD is a special district created by state law to enforce local, state, and federal air pollution regulations. Currently, the Placer County APCD has 9 regulations containing over 200 rules designated to control and limit emissions from sources of air pollutants and administer state and federal air pollution control requirements (Placer County APCD 2024). The

eastern portion of the MCAB under the jurisdiction of the Placer County APCD is in non-attainment of state and federal ambient air quality standards for ozone and $PM_{2.5}$, and of state ambient air quality standards for PM_{10} (EPA 2024; CARB 2022).[4] The Placer County APCD has established significance thresholds, shown in Table 3-1, to determine if a project would have air quality impacts under CEQA (Placer County APCD 2017).

Table 3-1. Placer County Thresholds of Significance

Pollutant	Construction Threshold (lbs/day)	Operational Threshold (lbs/day)
ROG	82	55
NO_x	82	55
PM_{10}	82	82

Source: Placer County APCD 2017

3.3.2 Discussion

Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The Placer County APCD is responsible for maintaining air quality and regulating emissions of air quality pollutants within the project vicinity. The Placer County APCD carries out its responsibility by preparing, adopting, and implementing plans, regulations, and rules that are designed to achieve attainment of state and national air quality standards. The 2017 Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan, which covers the portion of Placer County that is in nonattainment, discusses control strategies to reduce emissions and achieve attainment of the NAAQS by 2024 (SMAQMD 2017). The proposed project would not conflict with or obstruct implementation of the regional and federal ozone or particulate matter attainment plans, as described in the previous section, including planning for OHV emissions in the county. The project would not increase urban growth, introduce new stationary sources of air pollutants, or result in new land uses within the MCAB or the jurisdiction of the Placer County APCD. Therefore, the project would not conflict with or obstruct an applicable air quality plan.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. Expansion of the staging area would occur over a period of approximately two years, although construction would not occur during the winter, with most of the equipment being used only 14 days out of the total two-year period. The project's potential construction emissions were modeled using CalEEMod, Version 2022.1. CalEEMod is a computer program recommended for use by the SCAQMD for use in preparing emission estimates for land use and development projects. The emissions modeling reflects the

[4] On February 7, 2024, the U.S. EPA lowered the primary annual average health-based standard for $PM_{2.5}$ from 12 µg/m^3 to 9 µg/m^3. The U.S. EPA generally makes initial attainment/nonattainment designations within 2 years of the issuance of a new standard.

construction activities, duration, and equipment usage contained in the project description.[5] The proposed project's total construction emissions are summarized in Table 3-2.

Table 3-2. Maximum Project Construction Emissions

Pollutant	Project Emissions (lbs/day)	Placer County APCD Construction Threshold (lbs/day)	Threshold Exceeded
ROG	13.5	82	No
NO_x	6.9	82	No
PM_{10}	0.5	82	No

Source: MIG 2024

As shown in Table 3-2, the proposed project's construction emissions would not exceed Placer County APCD-recommended CEQA thresholds of significance and would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants.

The proposed project is designed to safely accommodate existing demand and is not anticipated to substantially change visitation levels, motorized trail miles travelled, or otherwise result in a change in emissions associated with the use of the trails. As such, the proposed project would not result in operations-related air quality impacts.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are defined by CARB as people who have a heightened risk of negative health outcomes due to exposure to air pollution. These include children, the elderly, and asthmatics. Sensitive receptor locations are where sensitive receptors may congregate, which may include hospitals, schools, and day care centers (CARB 2021).

Project construction would emit a maximum of 0.5 pounds per day of diesel particulate matter, a toxic air contaminant; however, there are no sensitive receptors close to the China Wall SA Expansion project area or the Loop 5 and 6 Reroutes. The nearest residences are located approximately 2.8 miles west of the China Wall SA and approximately 0.8 miles west of the nearest reroute, Loop 6. The nearest hospital is approximately 28 miles southwest of both China Wall SA and Loop 5, and the nearest school approximately 8.1 miles northwest of China Wall SA and approximately 5.6 miles northwest of the Loop 5. In addition, there is no known naturally occurring asbestos in the project area. For these reasons, the proposed project would not expose sensitive receptors to substantial pollutant concentrations.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. While the project would produce odors associated with construction, such as diesel fuel, motor oil and exhaust, the odors would be temporary and intermittent and would not affect a substantial number of people due to the remoteness of the proposed work areas.

[5] As a conservative assumption, heavy-duty construction equipment was modeled as being active throughout the entire construction period. It is anticipated that actual construction activity would involve less equipment usage than the activity level that was modeled. For example, the active use of the dozer and paver is anticipated to last approximately three (3) days and the active use of the compactor is anticipated to last for approximately five (5) days.

3.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	**X**	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	**X**	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	**X**	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	**X**	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	**X**
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	**X**

3.4.1 Regulatory Setting

Federal Regulations

Federal Endangered Species Act. The Federal Endangered Species Act (FESA) establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of the Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries) are charged with implementing and enforcing FESA. USFWS has authority over terrestrial and continental aquatic species, and NOAA Fisheries has authority over species that spend all or part of their life cycle at sea, such as salmonids.

Section 9 of FESA prohibits the unlawful "take" of any listed fish or wildlife species. Take, as defined by FESA, means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." The USFWS's regulations define harm to mean "an act which actually kills or injures wildlife." Such an act "may include "significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering" (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10. Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus.

U.S. Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA; (16 U.S.C. §§703–712) prohibits take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the USFWS. Under the MBTA, absent a permit, it is illegal to disturb an active nest of a protected migratory bird species, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS oversees implementation of the MBTA.

State Regulations

California Endangered Species Act. The California Endangered Species Act (CESA; California Fish and Game Code §§2050 *et seq.*) generally parallels FESA. It establishes the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Section 2080 of the California Fish and Game Code prohibits the take, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or by the regulations. "Take" is defined in Section 86 of the California Fish and Game Code as to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." This definition differs from the definition of "take" under FESA. CESA is administered by the CDFW. CESA allows for take incidental to otherwise lawful projects but mandates that state lead agencies consult with the CDFW to ensure that a project would not jeopardize the continued existence of threatened or endangered species.

California Species of Special Concern, Watch List, and California Fully Protected Species. California species of special concern (CSSC) are broadly defined as animals not listed under FESA or CESA, but which are nonetheless of concern to CDFW because they are declining at a rate that could result in listing, or historically occurred in low numbers, and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by the CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under CEQA during project review.

CDFW Watch List species are taxa that were previously CSSCs but do not currently meet CSSC criteria, and for which there is concern and a need for additional information to clarify status.

Four sections of the California Fish and Game Code list 37 fully protected (CFP) species (California Fish and Game Code §§ 3511, 4700, 5050, and 5515). Most of the species on these lists have subsequently been listed under CESA and/or FESA. CDFW may generally not authorize take or possession of fully protected species, with some exceptions, including for

scientific research and via development of a natural community conservation plan (NCCP; California Fish and Game Code § 2800 et seq.).

Nesting Birds. Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, "It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." In addition, under California Fish and Game Code Section 3503.5, "it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto." Passerines and non-passerine land birds are further protected under California Fish and Game Code Section 3513. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

Non-Game Mammals. Sections 4150-4155 of the California Fish and Game Code protects non-game mammals, including bats. Section 4150 states "A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission." The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under the California Fish and Game Code.

California Native Plant Protection Act. The California Native Plant Protection Act (CNPPA) preserves, protects, and enhances endangered and rare plants in California by specifically prohibiting the importation, take, possession, or sale of any native plant designated by the California Fish and Game Commission as rare or endangered, except under specific circumstances identified in the CNPPA. Various activities are exempt from the CNPPA, although take as a result of these activities may require other authorization from CDFW. Section 1911 of the CNPPA dictates that all state departments and agencies shall utilize their authority in furtherance of the purposes of the CNPPA by carrying out programs for the conservation of endangered or rare native plants. Notwithstanding that provision, CNPPA section 1913 directs that the performance by a public agency of its obligation to provide service to the public shall not be restricted because of the presence of rare or endangered plants.

California Native Plant Society Inventory. The California Native Plant Society (CNPS) has prepared and regularly updates an "Inventory of Rare and Endangered Vascular Plants of California." These rankings are incorporated into the CNDDB as California Rare Plant Rank (CRPR) in collaboration with CDFW. CRPR lists include the following: List 1B (Plants Rare, Threatened, or Endangered in California and Elsewhere); List 2 (Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere); List 3 (Plants About Which We Need More Information – A Review List); and List 4 (Plants of Limited Distribution – A Watch List).

3.4.2 Environmental Setting

Vegetation

Tree species present at the China Wall SA include Jeffrey pine, Ponderosa pine, white fir, and incense cedar (*Calocedrus decurrens*) generally ranging from 10 to 22 inches diameter at breast height (dbh). The understory is sparse, but greenleaf manzanita (*Arctostaphylos patula*) and dried grass were present in some areas at the time of the October 2024 site visit. The plant community along the Loops 5 and 6 reroutes is similar, except that large portions of Loop 6 burned in the Mosquito Fire in 2022, such that there are extensive areas with dead standing trees along the route.

This plant community corresponds to the Jeffrey pine forest alliance (*Pinus jeffreyi* Alliance) or the ponderosa pine forest and woodland alliance (*Pinus ponderosa* Alliance) in CDFW's Vegetation Classification and Mapping Program (VegCAMP; CDFW 2024a).

Wildlife

No birds were recorded during the October 2024 site visit, but according to eBird (Cornell Lab of Ornithology 2024), birds recently observed at the China Wall SA include dusky flycatcher (*Empidonax oberholseri*), mountain chickadee (*Poecile gambeli*), red-breasted nuthatch (*Sitta canadensis*), chipping sparrow (*Spizella passerina*), dark-eyed junco (*Junco hyemalis*), brown-headed cowbird (*Molothrus ater*), Nashville warbler (*Leiothlypis ruficapilla*), yellow-rumped warbler (*Setophaga coronata*), Townsend's warbler (*Setophaga townsendi*), hermit warbler (*Setophaga occidentalis*), black-throated grey warbler (*Setophaga nigrescens),* brown creeper (*Certhia americana*), spotted towhee (*Pipilo maculatus*), and common raven (*Corvus corax*).

According to iNaturalist (2025), mammals observed in the project area include American black bear (*Ursus americanus*), mountain lion (*Puma concolor*), mule deer (*Odocoileus hemionus*), western gray squirrel (*Sciurus griseus*), gray fox (*Urocyon cinereoargenteus*), and American beaver (*Castor canadensis*).

According to iNaturalist (2024), reptiles or amphibians observed in the project area include western rattlesnake (*Crotalus oreganus*), western terrestrial garter snake (*Thamnophis elegans*), Northern alligator lizard (*Elgaria coerulea*), Sierra newt (*Taricha sierrae*), ensatina (*Ensatina eschscholtzii*), Hell Hollow slender salamander (*Batrachoseps diabolicus*), and foothill yellow-legged frog (*Rana boylii*).

There is no aquatic habitat at the China Wall SA but Loops 5 and 6 cross or run parallel to Humbug, Indian, and Eldorado Creeks which could support fish. According to the California Fish Website (UC ANR 2025), the following species of fish occur currently or historically in Humbug Creek: bluegill (*Lepomis macrochirus*), brook trout (*Salvelinus fontinalis*), brown bullhead (*Ameiurus nebulosus*), brown trout (*Salmo trutta*), Chinook salmon (*Oncorhynchus tshawytscha*), golden shiner (*Notemigonus crysoleucas*), green sunfish (*Lepomis cyanellus*), Klamath River lamprey (*Entosphenus similis*), Klamath smallscale sucker (*Catostomus rimiculus*), Klamath speckled dace (*Rhinichthys osculus klamathensis*), largemouth bass (*Micropterus salmoides*), Lower Klamath marbled sculpin (*Cottus klamathensis polyporus*), and Pacific lamprey (*Entosphenus tridentata*). These species may also be currently or historically present in the other creeks in the project area.

Special-Status Species

Special-status species are those plants and animals that are legally protected or otherwise recognized as vulnerable to habitat loss or population decline by federal, state, or local resource conservation agencies and organizations. In this analysis, special-status species include:

- Species listed, proposed for listing, or candidates for listing as threatened or endangered under FESA (50 CFR §17.12 [listed plants], 50 CFR §17.11 [listed animals], and various notices in the Federal Register [proposed species]);
- Species listed, proposed for listing, or candidates for listing by the state of California as threatened or endangered under CESA (14 CCR §670.5);
- Species listed as sensitive by the Forest Service;

- TNF Watch List species;[6]
- Species that meet the definitions of rare or endangered under CEQA (CEQA Guidelines §15380);
- Plants listed as rare under the CNPPA;
- Animal species designated as CSSC; animal species listed as CFP or on CDFW's Watchlist; and
- Plants considered by CDFW in coordination with CNPS as "rare, threatened, or endangered in California" (CRPR lists 1 and 2).

MIG performed a review of available information on special-status species documented from the project region to evaluate the potential for such species to occur at the project site based on the presence or absence of suitable habitat or detection in the vicinity of the project area. Review of information included: 1) a search of the CNDDB and CNPS Rare Plant Inventory records of species occurring within the U.S. Geological Survey (USGS) Westville and Michigan Bluff 7.5-minute quadrangles (where the proposed project is located) and 10 surrounding quads; 2) review of the USFWS list of federal endangered and threatened species using the USFWS Information for Planning and Consultation (IPaC) online tool (USFWS 2024a); 3) a Calflora rare plants search for Placer County; 4) citizen science observations from iNaturalist (2024) and eBird (Cornell Lab of Ornithology 2024); 4) review of available TNF Truckee Ranger District biological reports prepared for the OHV SA and Expansions EA (USFS 2013) which includes the China Wall SA, and the Big Sugar Project EA (USFS 2019) which includes the Loops 5 and 6 Reroutes; and 5) the 2024 Habitat Management Program (HMP) that covers the TNF as part of the OHMVR Division Grants Program (USFS 2024c).

The list of special-status species that may occur in the China Wall SA Expansion and Loops 5 and 6 Reroutes project area differs from the EAs because China Wall SA is one of three staging areas covered in the OHV SA and Expansions EA (and this document does not cover the other two staging areas), and the Loops 5 and 6 reroutes are only a small part of the proposed actions and geographic area covered in the Big Sugar Project EA. In addition, NEPA documents only cover species with a federal listing status and do not cover species that are special-status only in California, although there is overlap between federal and state special-status species. Finally, the EAs were from 2013 and 2019, and some additional species records and changes in species classification and/or listing status have occurred since then.

According to the resources listed above, 42 special-status plant and fungi species and 25 special-status animal species occur in the twelve 7.5-minute quadrangles containing and/or surrounding the project site. Of those, 35 special-status plant and fungi species and 14 special-status animal species were determined to be absent or not expected to occur in or adjacent to the project site for at least one of the following reasons: (1) a lack of specific habitat (e.g., vernal pools, marsh, etc.) and/or edaphic requirements (e.g., serpentine soils) for the species in question; (2) the geographic range and/or elevation range of the species does not overlap the

[6] The Tahoe National Forest (TNF) maintains a watch list of botanical species (plants, lichen, and fungi) that of conservation concern, but have not been designated as Forest Service Sensitive (FSS) by the Regional Forester. This list includes species that are newly described; locally rare; range extensions or disjunct populations; plants of specific public interest; or species with too little information to determine their appropriate status. These species make an important contribution to forest biodiversity and should be protected under the provisions of the National Forest Management Act (NFMA) (1976). According to the Regional Forester, Watch List species should be considered during project planning with corresponding documentation maintained in the planning file (USDA Forest Service 2006).

project site, (3) the species is known to be extirpated from the site vicinity; (4) there are no records of the species in or near the project area; and/or (5) records of the species are far from the project site and/or old (i.e., from 50 years ago or more).

Appendix A tables list the special-status plant and animal species that occur in the general region of the project, along with their protection status, geographic distribution, habitat, and basis for determining which species have the potential to occur at the project site. Of note, five additional CNDDB-tracked animal species that do not have special-status protections are included in the tables for informational purposes but are excluded from this analysis. Special-status species that may be present in the project area are described below.

Special-Status Plants

Sanborn onion (*Allium sanbornii* var. *sanbornii*). Federal: TNF WL; State: CRPR 4.2. Sanborn onion is found in California and Oregon. It occurs in chaparral, cismontane woodland, and lower montane coniferous forest on gravelly, usually serpentine soils. It occurs at elevations from 260 – 1,510 meters (m). This perennial bulbiferous herb blooms from May to September (CNPS 2024). This species occurs near Loop 6 according to the Other Botanical Resources Report prepared for the Big Sugar Project EA (Rowe 2018b), and there are Calflora records of this species in the project area from 1994-2011 (Calflora 2024). There is suitable habitat in some parts of the project area.

Clubhair mariposa lily (*Calochortus clavatus* var. *avius*). Federal: USFS Sensitive, TNF WL; State: CRPR 1B.2. Clubhair mariposa lily is a California endemic found in Amador, Calaveras, El Dorado, and Placer counties. It inhabits lower montane coniferous forest (Josephine silt loam, volcanic) from 305 – 1,800 m. This perennial bulbiferous herb blooms from May to July (CNPS 2024). There are no CNDDB (CNDDB 2024) or TNF records in the project area, but there is suitable habitat in the China Wall SA project area according to the OHV SA and Expansions EA (USFS 2013).

Butte County fritillary (*Fritillaria eastwoodiae*). Federal: USFS Sensitive, TNF WL; State: CRPR 3.2. Butte County fritillary is found in California and Oregon. In California, it is found in Butte, El Dorado, Nevada, Placer, Shasta, Tehama, and Yuba counties. It inhabits chaparral, cismontane woodland, and lower montane coniferous forest in openings. It usually occurs on dry slopes but is also found in wet places; soils can be serpentine, red clay, or sandy. The elevation range for this species is 1,475 – 4,550 m. This perennial bulbiferous herb blooms from March to June (CNPS 2024). There are no CNDDB (CNDDB 2024) or TNF records in the project area, but there is suitable habitat in the China Wall SA project area according to the OHV SA and Expansions EA (USFS 2013).

Sierra blue grass (*Poa sierrae*). Federal: USFS Sensitive, State: CRPR 1B.3. Sierra blue grass is a California endemic found in Butte, El Dorado, Nevada, Placer, Plumas, Shasta, and Sierra counties. It inhabits lower montane coniferous forest on shady, moist, rocky slopes, often in canyons. The elevation range for this species is 365 – 1,915 m. This perennial rhizomatous herb blooms from April to July (CNPS 2024). There are CNDDB records of this species in the project area from 2018 in the El Dorado and Humbug Creek canyons (CNDDB 2024), and there are recent (2017-2023) Calflora records of this species in the project area (Calflora 2024). There is suitable habitat for this species in some parts of the project area.

Stebbins' phacelia (*Phacelia stebbinsii*). Federal: USFS Sensitive, TNF WL; State: CRPR 1B.2. Stebbin's phacelia is a California endemic found in El Dorado, Nevada, and Placer counties. It inhabits lower montane coniferous forest, cismontane woodland, and meadows and

seeps. It occurs among rocks and rubble on metamorphic rock benches from 610 – 2,010 m. This annual herb blooms from May to July (CNPS 2024). This species is known from the Westville and Michigan Bluff Quads according to the CNPS Rare Plant Inventory (CNPS 2024). There is suitable habitat in the China Wall SA project area according to the SA and Expansions EA, though it was not found in 2012 surveys of the site (USFS 2013).

Special-Status Animals

Western bumblebee (*Bombus occidentalis*). Federal: USFS Sensitive, State: Candidate Endangered under CESA (SCE). Once common and widespread, western bumblebees have declined precipitously from central California to southern British Columbia. They are now largely confined to high-elevation sites and areas east of the Cascade Crest**.** Western bumble bees use a wide variety of natural, agricultural, urban, and rural habitat types. They require suitable nesting sites, overwintering sites for the queens, and nectar and pollen resources throughout the spring, summer, and fall (CNDDB 2024). According to Bumblebee Watch, a western bumblebee was observed about 3.5 miles northwest of the China Wall SA in 2024 (Xerces Society et al. 2024). The project area is within the current range of this species and may include suitable nesting and foraging habitat.

Monarch Butterfly (*Danaus plexippus*). Federal: Proposed as threatened under FESA (FPT), USFS Sensitive. State: None. The range of monarch butterflies includes North America from southern Canada south to South America and the Caribbean. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts are located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby (CNDDB 2024). During summer, western monarchs live in canyons or riparian areas of the West, Southwest, inland California, and the inland Northwest states up to British Columbia. As caterpillars, monarchs feed exclusively on the leaves of milkweed, wildflowers in the genus *Asclepias*. Adult monarchs feed on nectar from a wide range of blooming native plants, including milkweed (National Wildlife Federation 2024). Monarch butterflies occur in the TNF according to the 2024 HMP that covers the Forest. Milkweed occurs in disturbed areas near roads and in wet areas but is generally uncommon on the TNF (USFS 2024c). There is no winter roosting habitat for this species in the TNF.

Foothill yellow-legged frog – north Sierra Distinct Population Segment (DPS; *Rana boylii* population 3). Federal: USFS Sensitive, State: listed as threatened under CESA (ST). The range of the foothill yellow-legged frog (FYLF) – north Sierra DPS includes Yuba River to Middle Fork American River, and Sutter Buttes. Subbasins (HU 8) Butte Creek, Honcut Headwaters – Lower Feather, Upper Yuba, Upper Bear, Upper Coon – Upper Auburn, North Fork American, and Lower American in Sutter, Yuba, Sierra, Nevada, and Placer counties. This species inhabits partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. It needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis (CNDDB 2024). FYLF is known to occur in the project area based on CNDDB (CNDDB 2024) and TNF (USFS 2024c) records, although it is highly aquatic and thus would only occur at stream crossings along the trail reroutes.

California red-legged frog (*Rana draytonii*). Federal: listed as threatened under FESA (FT), State: CSSC. California red-legged frogs (CRLF) are known from 35 counties in California in the Coast Range from southern Mendocino County to Santa Barbara County, through the northern Transverse Ranges from Santa Barbara County to Los Angeles County, and in isolated populations in the Sierra Nevada foothills, Riverside County, and San Diego County. They inhabit lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. They require 11-20 weeks of permanent water for larval

development and must have access to estivation habitat (CNDDB 2024). This species is known to occur in the project area based on CNDDB (CNDDB 2024) and TNF (USFS 2024c) records. According to the Big Sugar Project EA (USFS 2019), there is suitable habitat in the North and Middle Forks of the American River, Eldorado Creek, and Humbug Creek within the project area; this species also uses upland habitat and can disperse up to two miles.

Northwestern pond turtle (*Actinemys marmorata*).[7] Federal: FPT and USFS Sensitive, State: CSSC. Northwestern pond turtles (NWPT) are found throughout California west of the Cascade-Sierra from near sea level to 4,700 feet. They inhabit permanent ponds, lakes, streams, irrigation ditches or permanent pools along intermittent streams. There are no CNDDB records of this species in the project area (CNDDB 2024), although it is known from the TNF (USFS 2024c). According to the EA for the China Wall SA there is no suitable habitat within 0.25 mile (the dispersal distance for this species) of the project site. According to the Big Sugar Project EA that includes the trail reroutes, this species has not been detected in the project area. However, there is suitable habitat for this species in the project area in Humbug and Eldorado Creeks.

American goshawk (*Accipiter atricapillus*).[8] Federal: USFS Sensitive, State: CSSC. American goshawks inhabit forested areas all around the northern hemisphere, including both North America and Eurasia. They occur within, and in vicinity of, coniferous forest. They use old nests and maintain alternate sites. They usually nest on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees (CNDDB 2024). This species is known from the project area according to CNDDB (CNDDB 2024) and TNF (USFS 2024c) records. According to the OHV SA and Expansions EA, there is no suitable breeding habitat within 0.25 mile of the China Wall SA, but foraging habitat is present (USFS 2013). None of the goshawk PACs listed in the Big Sugar Project EA are near the Loops 5 and 6 Reroutes, and the EA does not mention any impacts to goshawks from these reroutes (USFS 2019).

California spotted owl (*Strix occidentalis occidentalis*). Federal: FPT, State: CSSC. The range of California spotted owls includes the Southern Cascade Range of northern California south along the west slope of the Sierra Nevada and in mountains of central and southern California nearly to the Mexican border, with three sight records from the Sierra San Pedro Mártir of northern Baja California. They inhabit old-growth forests or mixed stands of old-growth and mature trees. They occasionally occur in younger forests with patches of big trees. Suitable habitat includes a high, multistory canopy dominated by big trees, many trees with cavities or broken tops, woody debris, and space under canopy (CNDDB 2024). According to the OHV SA and Expansions EA there is no suitable breeding habitat within 0.25 mile of the China Wall SA, but there is a spotted owl protected activity center (PAC) within 0.9 of the site (USFS 2013). A map for the 2024 HMP shows two spotted owl PACs along Loop 6, and one within a mile of Loop 5 (USFS 2024c).

[7] The Big Sugar Project EA refers to the western pond turtle instead of northwestern pond turtle. Western pond turtles were split into two species subsequent to publication of the EA: the northwestern pond turtle in the northern portion of their range, and southwestern pond turtle in the southern portion of their range. The TNF is in the range of the northwestern pond turtle.

[8] The OHV Staging Area and Big Sugar Project EAs refer to northern goshawk rather than American goshawk. In 2023, the American Ornithological Society split northern goshawk, which occurred in North America and Eurasia, into two species: American goshawk and Eurasian goshawk. The American goshawk is the species that occurs in the TNF.

Pallid bat (*Antrozous pallidus*). Federal: none, State: CSSC. Pallid bats occur across much of western North America from the Okanagan Valley of south-central British Columbia to central Mexico. They use a variety of habitats, most commonly in open, dry habitats that contain rocky areas for roosting. They roost in shallow caves, crevices, mines, and occasionally in hollow tree cavities of large snags and in buildings (CNDDB 2024). There are no CNDDB records of this species in the project area (CNDDB 2024), but it is known from the TNF according to the 2024 HMP (USFS 2024c). According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA; USFS 2013). According to the Big Sugar Project EA, which includes the Loops 5 and 6 Reroutes, the project would have no impact on pallid bat (USFS 2019).

Townsend's big-eared bat (*Corynorhinus townsendii*). Federal: none, State: CSSC. Townsend's big-eared bats occur throughout California in a wide variety of habitats. They are most common in mesic sites. This species roosts in the open, hanging from walls and ceilings of caves, mines, and buildings. The availability of roosting sites limits this species presence. They are extremely sensitive to human disturbance. There are no CNDDB records of this species in the project area, but it is known from the TNF according to the 2024 HMP (USFS 2024c). According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA; USFS 2013). According to the Big Sugar Project EA which includes the Loops 5 and 6 reroutes, the project would have no impact on Townsend's big-eared bat (USFS 2019).

Western red bat (*Lasiurus blossevillii*). Federal: none, State: CSSC. Western red bats occur throughout portions of the western and central United States and much of Mexico, Central America, and South America. This species roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. They prefer habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging (CNDDB 2024). There are no CNDDB (CNDDB 2024) or TNF (USFS 2024c) records of this species in the project area. According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA; USFS 2013).

Sierra Nevada mountain beaver (*Aplodontia rufa californica*). Federal: none, State: CSSC. Sierra Nevada mountain beavers require dense growth of small deciduous trees and shrubs, wet soil, and an abundance of forbs in the Sierra Nevada. They need a dense understory for food and cover, and an abundant supply of water. They burrow into soft soil. There are CNDDB records of this species in the project area from El Dorado Canyon in 2009 (CNDDB 2024). Suitable habitat may be present along the trail reroutes at creek crossings.

3.4.3 Discussion

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than Significant with Mitigation Incorporated. Potential impacts to special-status species and their habitat are described below.

Special-Status Plants (Less Than Significant with Mitigation Incorporated)

The proposed project has the potential to impact special-status plants if any are present in or near the project sites, either directly by removing or damaging individual plants or populations, or indirectly by altering habitat or hydrological conditions. Based on a review of relevant databases and other available information, the following special-status plant species may be present in the project area: Sanborn onion (TNF WL and CRPR 4.2), clubhair mariposa lily (USFS Sensitive, TNF WL, and CRPR 1B.2), Butte County fritillary (USFS Sensitive, TNF WL, and CRPR 3.2), Sierra blue grass (USFS Sensitive and CRPR 1B.3), Stebbins' phacelia (USFS Sensitive, TNF WL, and CRPR 1B.2); see Section 3.4.2 for more information. The Big Sugar Project EA incorporated the following measures to avoid potential impacts to known populations of Sierra bluegrass (BR3) and Sanborn onion (BR4), as well as unknown populations of special-status plants (BR6).

- **BR3: Sierra bluegrass (*Poa sierrae*).** Occurrences of Sierra bluegrass are known along the Loop 5 reroute and decommission.
  -Flag these areas in the field and identify on project maps.
  -Botanist must be onsite during ground disturbing activities to assist with trail alignment to minimize damage to plants.
  -Do not regrade or cause other ground disturbance during decommission of roads and trails.
- **BR4: Serpentine Watchlist Species**. This measure addresses Sanborn's onion (*Allium sanbornii* var. *sanbornii*).
  -Identify these (known) areas on project maps. Due to the large area and extent, these occurrences will not be flagged in the field.
  -Limit ground disturbance to trail prism of 10 feet.
  -Do not locate staging areas in known occurrences.
- **BR6: Survey.** Additional surveys are needed if trail adjustments are outside of a 50-foot buffer from the originally proposed route.

However, since these measures do not address clubhair mariposa lily, Butte County fritillary, or Stebbins' phacelia and because the botanical surveys are over five years old, Mitigation Measure BIO-1 is needed to reduce potential impacts to special-status plants to less than significant levels. The OHV SA and Expansions EA and the Big Sugar Project EA both have incorporated measures to prevent the spread of invasive species (see Table 2-1), which would also help protect existing special-status plant populations and suitable habitat in the project area.

Impact BIO-1: The proposed project could occur in areas potentially containing special-status plant species resulting in disturbance of individual plants or their habitat.

Mitigation Measure BIO-1: Special-Status Plants Surveys and Protection. A qualified botanist shall conduct protocol-level survey(s) of the project site and a 100-foot buffer for special-status plants prior to the start of all ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, grading, paving, and fence or barrier installation). The survey(s) shall be conducted during the blooming season for all potentially occurring special-status plant species, according to the most current methodology recommended by CDFW and USFWS, depending on the listing status of the species. The surveys shall include but not be limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys shall not be

conducted during drought conditions when certain annual species may not be present. The results of the survey(s) shall be documented in a written report submitted to the OHMVR Division. The location and extent of all occurrences of special-status plant species encountered during the surveys shall be mapped and maintained in the USFS database. If the start of work is delayed, the special-status plant surveys shall be repeated every 5 years to ensure that data are current and to account for long-term and seasonal variation.

Known special-status plant populations and any special-status plants identified in the survey(s) shall be flagged and avoided with a minimum 100-foot buffer or BMPs shall be utilized to prevent indirect impacts on the special-status plants if the buffer is smaller. If any special-status plants cannot be avoided, they shall be transplanted to a suitable habitat area outside the work site that won't be disturbed in the future under the supervision of a qualified botanist.

A qualified botanist is defined as a biologist that has a degree in botany, or similar degree; can identify the special-status and common plant species that may occur in the project region; and have a minimum of two field seasons of experience conducting special-status plant surveys with positive identification of special-status plants in the project region.

Western Bumblebee (Less Than Significant Impact)

The Big Sugar Project EA (USFS 2019) contains the following analysis of potential impacts to western bumblebee, which is also relevant to the proposed Loops 5 and 6 reroutes:

> Direct effects to western bumble bees may occur and could include disturbance to foraging bumble bees or damage to nest colonies due to the removal of flowering shrubs and wildflowers during project implementation and long-term recreational use. Disturbance-type effects are expected to be short term and limited as preferred habitat (meadows and riparian areas) would not be treated under the proposed action. Disturbance would also be limited due to the narrow trail corridor and timing of project implementation being spread over several years, which would reduce the amount of disturbance on any given year. Preferred habitat that contains a concentration of flowering plants, such as riparian areas, would be limited to short crossings.

Due to the short-term nature of disturbance and avoidance of preferred habitat areas, the Loops 5 and 6 Reroutes are not expected to significantly impact western bumblebees. Much of the Loop 6 reroute area was also burned in the Mosquito Fire in 2022, so nectar sources are currently more limited in that area than at the time the EA was prepared.

Western bumblebees are not discussed in the OHV SA and Expansions EA, but as the China Wall SA is smaller than the Loops 5 and 6 reroutes, does not contain meadows or riparian areas, and has a sparse understory with limited nectar sources, the China Wall SA Expansion is not expected to impact western bumblebees.

Monarch Butterfly (Less Than Significant Impact)

The OHV SA and Expansions EA and the Big Sugar Project EA did not discuss monarch butterfly, which was proposed for listing as threatened under FESA after the EAs were published. Monarch butterflies occur in the TNF according to the 2024 HMP, but there is no winter roosting habitat for monarchs in the TNF. Milkweed occurs in disturbed areas near roads and in wet areas but is generally uncommon on the TNF (USFS 2024c). The China Wall SA has a very sparse understory and generally lacks nectar sources. Much of the area along Loop 6 was burned in the 2022 Mosquito Fire, and many of the plants in that area still have not

recovered. Milkweed prefers full sun and thus is unlikely to occur near Loop 5, which is heavily shaded by conifer trees. Although the project could remove small numbers of milkweed or nectar plants, it is not expected to significantly impact monarch butterflies or their habitat.

California Red-legged Frog (Less Than Significant Impact)

The OHV SA and Expansions EA stated that the proposed action (including the China Wall SA Expansion) would not have direct or indirect effects on CRLF or its habitat due to a lack of known occurrences and suitable breeding and nonbreeding habitat in the project area (USFS 2013). In addition, watershed, soils, and aquatic resources management requirements incorporated into the project would avoid and/or minimize impacts to aquatic species and their habitat. These requirements include allowing refueling and servicing at least 300 feet away from water or riparian resources, a spill response plan, construction staging on roads or compacted areas, work in riparian areas only in low flow conditions, stopping work during rain and implementing temporary erosion control measures, site drainage to allow infiltration and avoid concentrated flow, and dust abatement measures during construction (see Table 2-1).

Although CRLF have not been observed in the Loops 5 and 6 reroutes area, the Big Sugar Project EA indicates that Eldorado Creek and Humbug Creek-North Fork American River provide suitable habitat for CRLF (USFS 2019). Portions of the Loop 5 Reroutes are adjacent to or cross Humbug Creek, and portions of the Loop 6 reroute are adjacent to or cross Eldorado Creek. The Biological Assessment of Aquatic Species for the Big Sugar Project (BA) indicated that much of the potential CRLF breeding habitat in the project area is marginal due to: 1) the lack of ponded habitat generally found on the American River Ranger District, 2) many flashy and high gradient reaches in the streams and small tributaries that do not support backwater areas for breeding during spring flows, 3) sometimes isolated distribution of low gradient stream habitat, and 4) existence of roads, infrastructure, and some areas of heavy recreation use in the project area (Teater 2018). The Big Sugar Project EA concluded that:

> In summary, trail decommissioning and trail reroute activities are not expected to significantly affect CRLF by increasing risk of injury, harassment, and mortality; and decreasing the quality of suitable habitat in the area. There is potential to directly affect CRLF from the proposed actions, but because the nearest detections are over 2.6 miles away from the project area, that potential is low. However, suitable habitat in the area would be directly and indirectly affected by any increase in sedimentation that would occur as a result of newly rerouted trail use.

In addition, regarding the Big Sugar Project the BA stated:

> Nonetheless, potential impacts to the streams including sedimentation would be short-term and negligible due to application of [Standards & Guidelines] (S&Gs), project Design Features, and BMPs. Lakes or ponds would not be impacted by proposed activities. Given that route decommissioning activities are limited to existing routes, the distance to known CRLF detections, and implementation of S&Gs and BMPs, the scope and magnitude of effects to aquatic habitat from proposed activities are low. Implementation of this project is expected to improve hydrologic function and trail sustainability as new trail construction and trail reroute restoration would facilitate improved water drainage and reduce potential for future erosion."

Management requirements are incorporated into the project to avoid impacts to CRLF and other special-status aquatic species, including preventing movement barriers at stream crossings (AW1), retaining riparian vegetation (AW2), containing hazardous spills (AW3), surveying water drafting and equipment use locations in streams for sensitive aquatic species (AW4), informing a Forest Service aquatic biologist if a listed or sensitive amphibian is sighted (AW5), avoiding the use of erosion control materials that may trap amphibians (AW6), maintaining adequate

surface flows in fish-bearing streams during water drafting (AW7), and measures to avoid impacting CRLF and their habitat (AW8); see Table 2-1 for more detail. With implementation of management requirements, potential impacts to CRLF would be less than significant.

Foothill Yellow-Legged Frog and Northwestern Pond Turtle (Less Than Significant Impact)

The OHV SA and Expansions EA stated that the China Wall SA Expansion would not affect FYLF, NWPT, or their habitat due to a lack of suitable habitat or known occurrences of these species in the project area (USFS 2013). In addition, watershed, soils, and aquatic resources management requirements incorporated into the project would avoid and/or minimize impacts to aquatic species and their habitat (see the CRLF section above and Table 2-1 for more detail).

FYLF and NWPT are highly aquatic, and thus potential impacts from the Loops 5 and 6 reroutes would be limited to stream crossings and/or areas where the reroutes are close to streams. The Big Sugar Project EA (USFS 2019) stated that:

> Trail decommissioning, new trail construction and trail reroute activities are not expected to significantly affect western pond turtle (WPT) and foothill yellow-legged frog (FYLF) by increasing risk of injury, harassment, and mortality; and decreasing the quality of suitable habitat in the area. There is potential to directly affect WPT from the proposed actions, however, because the nearest detections are over 5.4 miles away from the project area that potential is low. In addition, there is potential to directly affect FYLF from the proposed actions; however, management requirements to survey where equipment travels through stream habitat for OHV trail work should reduce the risk of direct impacts. Suitable habitat in the area will be directly and indirectly affected by any increase in sedimentation that would occur as a result of newly rerouted and constructed trail use.

Potential impacts to FYLF and NWPT and their habitat, including from sedimentation, would be avoided or minimized by management requirements incorporated into the project (see the CRLF section above and Table 2-1 for more detail). With implementation of management requirements, potential impacts to FYLF and NWPT would be less than significant.

American Goshawk and California spotted owl (Less Than Significant Impact)

The OHV SA and Expansions EA stated that there is no suitable breeding habitat for goshawks or California spotted owls within 0.25 mile of China Wall SA. There are no PACs for goshawks near the project area, but there is a PAC for California spotted owl 0.9 mile from China Wall SA. There is marginally suitable foraging habitat for both species in and near the staging area. Thus, the China Wall SA Expansion would eliminate one acre of marginally suitable goshawk and California spotted owl foraging habitat (USFS 2013). The EA did not recommend a limited operating period (LOP) for goshawks or California spotted owls for the China Wall SA Expansion due to the lack of suitable breeding habitat, but a management requirement incorporated in the project requires incidental sightings of federally-listed and sensitive species prior to or during project implementation to be reported to the District Wildlife Biologist for development of appropriate recommendations (see Chapter 2 Project Description, Section 2.6 Standard Management Requirements Incorporated into Project for more detail).

None of the goshawk PACs listed in the Big Sugar Project EA are near the Loops 5 and 6 Reroutes, and the EA did not mention any impacts to goshawks from these reroutes (USFS 2019). It's not clear from the EA if any California spotted owl PACs are near Loops 5 and 6, but the 2024 HMP shows a California spotted owl PAC along Loop 6, possibly near the proposed reroute (USFS 2024c). Regarding potential impacts from the Big Sugar Project to California spotted owls, the EA states:

> "Building new trail creates temporary construction disturbance, long-term disturbance associated with recreational use, and some risk of injury or mortality, thus new trails create an adverse effect for spotted owls. Construction would occur under limited operating periods, preventing disturbance near activity centers during the breeding season."

The EA makes a very similar statement regarding goshawks.

The EA also states that the limited length of trail segments in most territories, along with the lack of known breeding activity or distance of nest sites from the proposed trails is expected to limit adverse effects to these species. Regarding the impacts of trail reroutes on California spotted owls, it states: "The reroutes, because they are avoiding problematic segments on existing trails, are expected to result in reduced long-term disturbance associated with maintenance and use, although they may receive increased use simply because they will be better trails." The EA indicates that the Big Sugar Project would not significantly impact goshawk and spotted owl habitat, stating:

> "Regardless, the habitat affected by the trails would not be measurably fragmented by the small footprint in the much larger analysis area and project area, so effects to habitat are largely discountable. The project as a whole would increase the number of miles of trail in the network, but would retain important habitat characteristics such as overstory, large trees, and complex, mature forest ecosystems."

Management requirements incorporated into the project include LOPs during the breeding season in PACs for these species (TW1), reporting any detections of threatened, endangered, or sensitive species during project implementation to the District Wildlife Biologist to determine any needed protective measures (TW3), and locating trails to avoid cutting large trees, trees with evidence of wildlife use, large snags, and large downed logs (TW4); see Chapter 2 Project Description, Table 2-1 Standard Management Requirements Incorporated into Project for more detail. With implementation of management requirements, potential impacts to American goshawks and California spotted owls would be less than significant.

Nesting Birds (Less Than Significant with Mitigation Incorporated)

All native birds and their nests are protected under the MBTA and the California Fish and Game Code. Trees and other vegetation at China Wall SA Expansion area and along the Loops 5 and 6 Reroutes provide nesting habitat for a variety of native birds (see Section 3.1 for a list of recently observed bird species in the project area). The nesting bird season is generally from February 1 to September 15. Mitigation Measure BIO-3, listed below, would reduce potential impacts to nesting birds to less than significant levels.

> **Impact BIO-2:** The proposed project could have short-term impacts on nesting birds during construction, either directly by removing nests resulting in injury or mortality, or indirectly by disturbing nesting birds.
>
> **Mitigation Measure BIO-2: Protection of Special-Status and Nesting Birds**. To avoid impacts on nesting birds and violation of state and federal laws pertaining to birds, all ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree or other vegetation removal, grading, paving, and fence or barrier installation) should occur outside the avian nesting season (that is, prior to February 1 or after September 15). If ground-disturbing activities and construction noise occurs within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed for the presence of active nests by a qualified

> biologist no more than seven days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than seven days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented and submitted to the OHMVR Division.
>
> If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist in consultation with the CDFW, as appropriate, until the chicks have fledged. Monitoring shall be required to ensure compliance with relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.
>
> A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; a minimum of two years of experience in nesting bird surveys with positive results; and must be able to identify the species and be familiar with nesting behavior of common and special-status bird species found in the project area.

<u>Pallid Bat, Townsend's Big-Eared Bat, Western Red Bat, and Other Roosting Bats (Less Than Significant with Mitigation Incorporated)</u>

Pallid bat and Townsend's big-eared bat have been documented in the TNF according to the 2024 HMP, and there are known Townsend's big-eared bat maternity roosts in the ARRD. Although the western red bat has not been documented in the TNF (USFS 2024c), the OHV SA and Expansions EA says that all three species may occur in the China Wall SA Expansion project area. The EA states:

> Direct effects to bats are possible but unlikely because the staging areas are not located in high quality habitats (e.g., not in association with a wetland, in a riparian corridor, or adjacent to a roosting structure such as a bridge or abandoned historic building) and [because] these species are crepuscular to nocturnal [whereas] project activities would occur during the day. Effects to bats may include short term disturbance to individuals (e.g., flushing individuals from the project area) or change habitat use patterns during implementation. Direct effects to pallid, Townsend's big-eared, and western bat habitats would include the removal of small trees, which may provide marginal roosting cover, on one acre at China Wall.

The Big Sugar Project EA does not discuss these species or any other bat species but includes a management requirement to report any mine openings and limit trail construction within 500 feet of mine openings (TW2).

All roosting bats are protected by the California Fish and Game Code. Roosting colonies and maternity roosts are particularly vulnerable to disturbance. Mitigation Measure BIO-3, listed below, would reduce potential impacts to roosting bats to less than significant levels.

> **Impact BIO-3:** The proposed project could impact roosting bats protected by California Fish and Game Code.
>
> **Mitigation Measure BIO-3: Special-Status and Roosting Bat Protection**. Not less than 30 days before the start of ground-disturbing activities (including but not limited to mobilization and staging, clearing, grubbing, tree or other vegetation removal, grading, paving, and fence or barrier installation), a qualified biologist shall survey the work site

and a 50-foot buffer for bat roosting habitat (large trees with cavities, rock outcrops, caves, and mines).

If bat roosting habitat and/or signs of bats (e.g., guano pellets or urine staining) are identified in the survey, a follow-up dusk emergence survey shall be conducted by a qualified biologist prior to the start of construction activities. A dusk survey will determine the number of bats present and shall also include the use of acoustic equipment to determine species of bats present. The results of the surveys shall be documented and submitted to the OHMVR Division.

If roosting bats are detected, they shall be avoided with roost avoidance buffers, seasonal activity restrictions, or monitoring of roost locations. If an occupied maternity or colony roost is detected, CDFW shall be consulted to determine appropriate measures, such as the establishment of a no-disturbance buffer.

A qualified biologist is defined as a biologist that has a degree in biological sciences, or similar degree; has at least two years of experience conducting bat surveys that resulted in detections for the relevant species; and is familiar with the types of equipment used to conduct surveys.

Sierra Nevada Mountain Beaver (Less Than Significant Impact)

Sierra Nevada mountain beaver occurs in Eldorado Creek according to 2009 CNDDB records (CNDDB 2024). However, since this is a riparian species and there is no suitable habitat in or adjacent to the China Wall SA, and suitable habitat along the Loops 5 and 6 reroutes is limited to creek crossings, the project is not expected to significantly impact the species. Trail design measures for creek crossings and standard management requirements for aquatic species incorporated in the project (Table 2-1) would prevent significant impacts to Sierra Nevada mountain beavers.

b. Have a substantial adverse effect on any riparian or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Less Than Significant Impact. There is no riparian habitat in or adjacent to the China Wall SA, but portions of the Loop 5 reroutes are adjacent to or cross Humbug Creek, and portions of the Loop 6 reroute are adjacent to or cross Indian Creek and Eldorado Creek. Trail design measures for creek crossings and standard management requirements for aquatic species incorporated in the project would prevent significant impacts to riparian habitats. These include hardening creek crossings or using a bridge to avoid damage to creeks (creek or ephemeral drainage crossing measures), retaining riparian vegetation (AW2), containing hazardous spills (AW3), and water quality protection measures (see Table 2-1 for more detail). Implementation of these measures would ensure the project would not significantly impact riparian communities. There are no other sensitive natural communities known to occur in the project area.

There is no USFWS- or NOAA Fisheries-designated critical habitat or essential fish habitat (EFH) in the project area (USFWS 2024b, NOAA Fisheries 2024a, and NOAA Fisheries 2024b).

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact. There are no wetlands in the project area according to the National Wetlands Inventory (NWI 2024), and potential wetlands were not observed during the site visit. There are several riverine features in the project area that are likely state or federally protected. These include Humbug Creek near Loop 5, and Eldorado and Indian Creeks near Loop 6. There are no creeks in or adjacent to the China Wall SA. Trail design measures for creek crossings and standard management requirements for aquatic species incorporated in the project would prevent significant impacts to protected waters. These include hardening creek crossings or using a bridge to avoid damage to creeks (creek or ephemeral drainage crossing measures), retaining riparian vegetation (AW2), containing hazardous spills (AW3), and water quality protection measures (see Table 2-1 for more detail).

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The project site is in the TNF, a large, forested area with abundant wildlife movement opportunities and potential nursery sites for terrestrial wildlife such as nesting birds and denning mammals. Humbug Creek, Eldorado Creek, and Indian Creek provide aquatic movement corridors and/or nursery sites in the project area.

The proposed project would expand the China Wall SA by approximately 1.5 acres and construct trail reroutes along Loops 5 and 6 near China Wall SA. However, the project would not include fencing, new roads, or other wildlife movement barriers. Wildlife movement opportunities in the project area would be similar to existing conditions after project completion. In addition, standard management requirements incorporated in the project include preventing movement barriers at stream crossings (AW1), retaining riparian vegetation (AW2), maintaining adequate surface flows in fish-bearing streams during water drafting (AW7), LOPs during the breeding season in PACs for goshawks and California spotted owls (TW1), locating trails to avoid cutting large trees, trees with evidence of wildlife use, large snags, and large downed logs (TW4), and water quality protection measures to avoid and/or minimize impacts to wildlife movement and nursery sites (see Table 2-1). With implementation of standard management requirements, potential impacts to wildlife movement and nursery sites would be less than significant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The project site is on federal (USFS) land, and no local policies or ordinances apply to the project area. Therefore, the project does not conflict with any local policies or ordinances protecting biological resources.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. There are no adopted habitat conservation plans, natural community conservation plans, or other approved local habitat related plans in effect in the project area (CDFW 2024b).

3.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	**X**
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	**X**	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	**X**	☐

3.5.1 Regulatory Setting

National Historic Preservation Act

The National Historic Preservation Act (NHPA) (16 U.S.C §§ 470 et seq.) declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the expansion and maintenance of the National Register of Historic Places (NRHP), established the position of State Historic Preservation Officer (SHPO), provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assist Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic Preservation (ACHP).

NHPA establishes the nation's policy for historic preservation and sets in place a program for the preservation of historic properties by requiring federal agencies to consider effects on significant cultural resources (i.e. historic properties) prior to undertakings.

National Register of Historic Places

The NRHP was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, or association. A property is eligible for the NRHP if it is significant under one or more of the following criteria:

Criterion A: It is associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B: It is associated with the lives of persons who are significant in our past.

Criterion C: It embodies the distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction.

Criterion D: It has yielded, or may be likely to yield, information important in prehistory or history.

Cemeteries, birthplaces, or graves of historic figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are not considered eligible for the NRHP unless they satisfy certain conditions. In general, a resource must be at least 50 years of age to be considered for the NRHP, unless it satisfies a standard of exceptional importance.

California Environmental Quality Act (CEQA)

CEQA provides criteria to evaluate whether a building, structure, object, or site is significant. Under CEQA Guideline §15064.5(a), historic resources include the those meeting the criteria listed below.

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR; Pub. Res. Code §5024.1, 14 CCR § 4850 *et seq.*)

(2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(K) or identified as significant in an historical resource survey meeting the requirements of PRC Section 5024.1(g), shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, providing the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historic Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) (Criteria listed below under *California Register of Historical Resources*).

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified in a historical resources survey (meeting the criteria in PRC Section 5024.1(g)) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC §5020.1(j) or 5024.1. In accordance with CEQA, properties designated or eligible at all levels are deserving of protection by a lead agency when any undertaking proposes to demolish or alter any such property.

California Register of Historical Resources

The CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate properties that are to be protected, to the extent prudent and feasible, from substantial adverse change (Pub. Res. Code §5024.1)." Certain properties, including those listed in or formally determined eligible for listing in the NRHP and California Historical Landmarks (CHLs) numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated

by local landmarks programs may be nominated for inclusion in the CRHR. A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria (Pub. Res. Code §5024.1):

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Criterion 2: It is associated with the lives of persons important in our past.

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of an important creative individual; or possesses high artistic values.

Criterion 4: It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance. It is possible that a resource whose integrity does not satisfy NRHP criteria may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data. Resources that have achieved significance within the past 50 years also may be eligible for inclusion in the CRHR, provided that enough time has lapsed to obtain a scholarly perspective on the events or individuals associated with the resource.

Assembly Bill (AB) 52

AB 52 specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. AB 52 specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. See also Section 3.18.1.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code Section 622.5

Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Government Code Section 6254(r)

Government Code explicitly authorizes public agencies to withhold information from the public relating to Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission (NAHC).

Government Code Section 6250 et. seq.

Records housed in the Information Centers of the California Historical Resources Information System (CHRIS) are exempt from the California Public Records Act.

United States Forest Service Region 5 Programmatic Agreement Section 7.9

USFS Region 5 Programmatic Agreement (USDA and SHPO 2018) Section 7.9 stipulates that, in the event of inadvertent or unanticipated discoveries of human remains on Region 5 lands, the County Coroner be notified immediately in accordance with California Heal and Safety Code Section 7050.5(b), and if remains are determined to be Native American or Native American cultural items pursuant to the Native American Graves Protection and Repatriation Act (NAGPRA) are uncovered, the provisions of NAGPRA and its regulations at 43 CFR Section 10 and Archaeological Resources Protection Act (ARPA) at 43 CFR Section 7 shall be followed on federal lands. If such remains or items are discovered off federal lands within California, for projects authorized by the Forest Service, the provisions of the California Native American Graves Protection and Repatriation Act (California Health and Safety Code 8010-8030, and California Public Resources Code 5097.98-99) shall be followed.

3.5.2 Environmental Setting

The geographic region of the Sierras exhibits archaeological evidence of multi-season occupation going back millennia. The proposed project site in the northern Sierra within TNF is ethnographically known to have been inhabited by Hokan-speaking peoples since at least 6000 BCE, who are assumed to have entered California via the Plateau or Great Basin (Markley and Henton, 1985). Later in time, speculatively during a period between 3000 BCE through 1000 CE, Penutian speakers entered California in as many as four different waves from the Great Basin and Plateau area. Within the area comprising TNF in the northern Sierra, this resulted in the establishment of two linguistically different groups: the Maidu, who were Penutian speakers, and the Hokan-speaking Washoe (Markley and Henton, 1985). In addition to the Washoe and Maidu, the Nisenan tribe, often inaccurately referred to as “Maidu” or “southern Maidu,” is associated with the northern Sierra and the project area. A subgroup of California Penutian linguistic family along with Maidu and Konkow, the Nisenan are a separate Tribe with their own Cultural lifeways (Markley and Henton, 1985; Wilson and Towne, 1978; Nisenan, 2025). The tribal territory of the Nisenan encompassed the Yuba and American river drainages and bordered the Miwok territory to the south. The presence of a significant number of wide-spread central California loanwords in Nisenan suggests a spread into non-Maiduan, mostly Miwok, territory in the past 1000 to 1200 years (Golla, 2007). Archaeological studies reveal clusters of major villages near the project area, south of the North Fork of the American River (Wilson and Towne, 1978).

Early Euro-American contact in the northern Sierra began in 1776 with exploration of Miwok territory by José Canizares and continued through the early 1800s. In 1808 Gabriel Moraga crossed into Nisenan territory. While there are no explicit records of Nisenan being removed and coerced into missions, the forced missionization of neighboring populations and introduction of beaver trapping in the region significantly disrupted Indigenous lifeways. Disruption was

further exasperated by the great malaria epidemic that swept through the Sacramento Valley in 1832-1833 and diminished local native populations (Wilson and Towne, 1978; Bainbridge, 2013).

While the Indigenous populations in the mountains were lesser affected by the epidemic and early settlers compared to valley populations, the discovery of gold in 1848 spared none. Lands of all elevations were overrun in a period of two to three years, resulting in widespread killing, destruction of villages, and the persecution of Indigenous peoples (Wilson and Towne, 1978). California's entry into statehood in 1850 further exacerbated the situation by opening even more opportunities for White migrants to settle in the West.

Through the following decade, mining practices in the norther Sierra developed from individualistic, primitive forms of industry into a capitalist system based on employment of miners by large-scale mining companies. Settlement patterns also shifted from transitory mining camps and great fluidity in population to more settled and permanent towns strategically placed along transportation links (Turrentine et al, 1982).

Through the remainder of the 19th century, mining technologies continued to evolve, introducing new methods of mining to the TNF and new impacts on the natural environment. The introduction of hydraulic mining resulted in the development of water systems to operate the machinery, most often comprising three types of dams—diversion, storage, and distribution—serviced by ditches and flumes of varying size, length, and methods of construction to carry water to and from these systems (Turrentine et al, 1982).

As the mining industry stabilized and expanded through the northern Sierra, additional industries in the region grew alongside the enterprise. Logging and agriculture within TNF were first tied closely to, and served primarily, the mining industry. Through the following decade however, these industries expanded with the establishment of transportation systems through the region. The first sawmill within TNF was introduced in 1850 and promptly followed by several others through the 1850s. The logging industry expanded beyond the mining market to the railroad construction industry in the 1860s and into the general timber market through the turn of the century (Turrentine et al, 1982).

Similarly, agricultural production also expanded for outside markets as transportation through the region improved. Agricultural activities were largely focused on the Sierra Valley where farms producing vegetables, potatoes, and hay were established, alongside several ranches. Other areas of permanent agricultural settlement included scattered small farms or ranches near mining towns and stage stations. Livestock grazed the forest range lands. While initially established to provide food and fodder for the mining towns and logging camps nearby, the farms and ranches gained access to larger markets upon completion of the railroad (Turrentine et al, 1982).

The impacts of these rapidly growing industries began to show in the natural landscape. By the 1880s, writers, professionals, and scientific groups began to threaten that the country would face a "timber famine" if regulatory measures were taken to stop the plunder and destruction of the country's forests. In response, the Forest Reserve Act was passed in 1891 that authorized the President to set aside forest reservations. The TNF was established 14 years later in 1906. Under this new designation, the National Forest Service hired staff to build recreational trails, buildings, bridges, camps, and other infrastructure on the land, allowing for expanded public use, while attempting to regulate the extractive lumber, ranching, and mining industries (Turrentine et al, 1982). Though better regulated, timbering continues through private use

permits today; the record search from the North Central Information Center reveals reports of timber sales and studies in the general region of the project area dating to the 1990s.

3.5.3 Discussion

Would the proposed project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. The types of cultural resources that meet the definition of historical resources under Public Resources Code (PRC) Section 21084.146 consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. Archaeological resources are discussed under (b) below, and the potential for cultural resources associated with Native American culture and history are discussed under Tribal Cultural Resources in Section 3.18. Post-Contact built environment historical resources are discussed here.

MIG conducted a CHRIS search through the North Central Information Center (NCIC). The search was completed on December 2, 2024. The records search covered the project area and a .25-mile buffer zone. No historical resources have been recorded or identified within the project area or buffer. Several cultural resource investigations have been completed in the vicinity, but the resources identified are primarily archaeological in nature and are summarized under discussion item (b).

There are no historical resources, such as mining/homesteading sites or historic trails/roads, that indicate continued use and maintenance within the project site or buffer. As such, there would be no impacts to historical resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. As described under (a) above, MIG submitted a CHRIS search request to the NCIC in November of 2024. The CHRIS search was completed on December 2, 2024. Nine archaeological resources were discovered within the project site or within the 0.25-mile buffer zone. Of these, four resources were categorized as Pre-Contact sites and five resources as Post-Contact sites. The four Pre-Contact resources are discussed under Tribal Cultural Resources in Section 3.18. Post-Contact archaeological resources are discussed here.

The five Post-Contact archaeological resources identified within the 0.25-mile buffer zone are listed in Table 3-3. The table includes the resource name, resource type, and the unique IDs assigned to the documentation of the resources.

Table 3-3. Archaeological Resources within the Project Area

Resource Name	Resource Type
No resource name. Other ID: Other – Site #4 Mine Shaft	Site
Lower Quartz Canyon Mine Site	Site
Upper Quartz Canyon Mine Site	Site

Resource Name	Resource Type
No resource name. Other ID: Other – Site #7 Mining Artifact Site	Site
China Wall – Iowa Hill Ditch	Structure, Site

All of these sites comprise multiple mining features scattered across sites within, or in the vicinity of, the project area.

In addition to the nine identified resources, the CHRIS search results listed eight archaeological summary and investigation reports overlapping with the project site and 0.25-mile buffer zone (Table 3-4).

Table 3-4: Cultural Reports within the Project Area

Report Number	Year	Title	Report Type
003192	1986	Documentation of Cultural Resource Inventory and Assessment Work Performed for the Proposed Forks House Timber Sale (ARR-05-17-679)	Archaeological field Study
003219	1981	Arch. Recon. Report Clara-Dix Small Green Sale	N/A
006139	1999	Archaeological Addendum for Pioneer Mines Timber Harvest Plan	CF MOU
006142	1991	Cultural Resources Inventory Report for the Proposed Foresthill Winter Recreation Staging Area	N/A
006158	1984	An Archaeological Reconnaissance Report for Forks House and Corral Spring Timber Sales	N/A
006159	1994	Cultural Resource Inventory of the Big Reservoir Ecosystem Management Projects	Archaeological Field Study, Management, Planning
007123	2000	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California, Project Name: Humbug THP	CF MOU
009686	1995	Divide Hazard Tree Salvage Sale	Archaeological Field Study
010796	1998	Confidential Archaeological Addendum for Timber Operations on Non-Federal Lands in California	CF MOU

It should be noted that although only three of these reports indicate the presence of archaeological resources within the project site (Reports 003192, 006139, 007123), several resources, both Pre- and Post-Contact, were identified within the boundaries of the report survey areas. All of the recorded resources are located within TNF, within or adjacent to the project area.

Based on the Post-Contact habitation, migration, mining, ranching, and logging histories that are associated with this region of TNF, and the presence of archaeological sites outside but adjacent to the project area, it is considered archaeologically sensitive. This sensitivity has been recognized by the EA completed by the Forest Service for the Big Sugar Project in 2019. The Big Sugar Project site encompasses the China Wall area. The EA identifies standard management requirements for the project area which are incorporated into this project, outlined in Section 2.6.1. Of the management requirements, the EA states:

> ***CR1: Management of Sites.*** *Protect cultural resource sites designated on the ground with flagging and identified on maps provided by the cultural resource specialist. If any new cultural resources are discovered during project implementation, cease operations in the area of new discovery until adequate protection measures are agreed upon. No tracked equipment shall be operated off of existing Forest System Routes within cultural resource site boundaries. Rubber tired equipment may be allowed within specific areas of sites, only with written approval of the Heritage Program Manager. Cultural resource sites shall not be used for work camps, staging areas or parking vehicles and equipment. Proposed work camps, staging areas, and the off-road access routes need to be cleared by the District Archaeologist prior to use.*

Furthermore, should any archaeological resources be uncovered during construction in TNF, the procedures as stipulated by Section 7.10 of the USFS Region 5 Programmatic Agreement with the California State Historic Preservation Officer (USDA and SHPO 2018) would be followed. The stipulation outlines the process of discoveries and inadvertent effects, requiring written notification to the Regional Heritage Program Leader and SHPO within two working days of discovery. The USFS would then consult with SHPO, the ACHP, and affiliated Tribes regarding the cultural and religious significance of the resource and any necessary treatment measures. Once resource evaluation is complete and standard protection measures are applied (if applicable) the project may resume.

Compliance with the above EA standard management practices and existing USFS policies and practices ensures that the potential impact on archaeological resources within the project area is less than significant. See Tribal Cultural Resources (Section 3.18) for further discussion of potential archaeological resources associated with Indigenous peoples.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Although not expected, if human remains were inadvertently discovered during project construction, the USFS would follow the procedures as outlined in California Health and Safety Code section 7050.5 and stipulated per section 7.9 of the USFS Region 5 Programmatic Agreement with the California State Historic Preservation Officer (USDA and SHPO 2018). All project activities at the find site must come to a complete stop, and no further excavation or disturbance of the area or vicinity would occur. The county coroner must be contacted immediately, and if the coroner determines or has reason to believe that the remains are Native American, the coroner would contact the NAHC within 24 hours of making this determination. Whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC follows the procedures as outlined in Public Resources Code section 5097.98.

Per the Programmatic Agreement, if the remains are determined to be Native American or if Native American cultural items pursuant to NAGPRA are uncovered, the provisions of NAGPRA and its regulations at 43 CFR 10 and ARPA at 43 CFR 7 would be followed on federal lands.

The CEQA Guidelines (14 CCR §15064.5(e)) reference the appropriate state law (PRC §5097.98) that applies when human remains are accidentally discovered. This language states:

> In the event that human remains are accidentally discovered, the project must come to a complete stop and no further excavation or disturbance of the area or vicinity will occur. The county coroner is to be called immediately to determine

> that the remains are of Native American ancestry. If the coroner confirms that the remains are Native American, within 24 hours of the discovery the coroner is to contact the [NAHC]. The NAHC will identify the person(s) believed to be the Most Likely Descendent (MLD), and the MLD will decide, along with the property owner, on appropriate treatment or disposal of the human remains and associated grave goods as provided in PRC §5097.98. If the NAHC cannot identify the MLD, the MLD fails to make a recommendation, or the property owner rejects the MLD's recommendations, the property owner can rebury the remains and associated burial goods in an area not subject to ground disturbance (14 CCR §15064.5).

Compliance with existing state Public Resources Code and Health and Safety Code ensures that the NAHC would be notified upon discovery of Native American human remains and that proper treatment measures would be implemented. Therefore, with these protective state laws in place, the potential project impact on human remains is less than significant.

3.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	**X**
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	**X**

3.6.1 Regulatory Setting

Since increased energy efficiency is closely tied to the state's efforts to reduce GHG emissions and address global climate change, the regulations, policies, and action plans aimed at reducing GHG emissions also promote increased energy efficiency and the transition to renewable energy sources. The U.S. Environmental Protection Agency (EPA) and the state address climate change through numerous pieces of legislation, regulations, planning, policy-making, education, and implementation programs aimed at reducing energy consumption and the production of GHG.

While there are numerous regulations that govern GHG emissions reductions through increased energy efficiency, the following regulatory setting description focuses only on regulations that: 1) provide the appropriate context for the proposed project's potential energy usage; and 2) may directly or indirectly govern or influence the amount of energy used to develop and operate the proposed improvements. See the Regulatory and Environmental Setting discussion in Section 3.8.1, Greenhouse Gas Emissions, for a description of the key regulations related to global climate change, energy efficiency, and GHG emission reductions.

Federal Vehicle Standards

In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regarding fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011. Since then, federal vehicle standards have continued to be updated. In 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 and in 2012, adopted a final rule for light-duty vehicles model year 2017-2021. In May 2022, the NHTSA adopted new standards which increased fuel efficiency 8% annually for model years 2024-2025 and 10% annually for model year 2026.

In addition to the regulations applicable to cars and light-duty trucks, in 2011 the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. In 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program that would apply to vehicles with model year 2018–2027 for certain trailers, and model years 2021–2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks (EPA and NHTSA 2016).

3.6.2 Environmental Setting

Energy consumption is closely tied to the issues of air quality and greenhouse gas (GHG) emissions, as the burning of fossil fuels and natural gas for energy has a negative impact on

both, and petroleum and natural gas currently supply most of the energy consumed in California.

In general, California's per capita energy consumption is relatively low, in part due to mild weather that reduces energy demand for heating and cooling, and in part due to the government's proactive energy-efficiency programs and standards. According to the California Energy Commission (CEC), Californians consumed about 287,826 gigawatt hours (GWh) of electricity and 11,711 million therms of natural gas in 2022 (CEC 2022a and CEC 2022b).

In 2022, total electricity use in Placer County was 3,087 million kilowatt hours (kWh), including 1,458 million kWh of consumption for non-residential land uses (CEC 2022a). Natural gas consumption was 99 million therms in 2022, including 30 million therms from non-residential uses (CEC 2022b). There were an estimated 169 million gallons of gasoline and 26 million gallons of diesel sold in Placer County in 2022 (CEC 2023).

Energy conservation refers to efforts made to reduce energy consumption to preserve resources for the future and reduce pollution. It may involve diversifying energy sources to include renewable energy, such as solar power, wind power, wave power, geothermal power, and tidal power, as well as the adoption of technologies that improve energy efficiency and adoption of green building practices. Energy conservation can be achieved through increases in efficiency in conjunction with decreased energy consumption and/or reduced consumption from conventional energy sources.

3.6.3 Discussion

Would the project:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. The proposed project consists of the expansion of a staging area for OHV users and reroutes of Loops 5 and 6. The construction activities would require the use of construction equipment and generate construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. This use of energy is necessary to provide parking and access to trails and to prevent the erosion and damage to vegetation and water quality that is caused by existing informal parking and steep trail segments. The use of these fuels to construct necessary facilities is not wasteful or unnecessary, and construction activities would occur in an efficient manner that would avoid unnecessary fuel combustion. No impact would occur.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The staging area expansion and trail reroutes would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. There are no plans for renewable energy or energy efficiency applicable to the project or its location. No impact would occur.

3.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42).	☐	☐	☐	**X**
ii) Strong seismic ground shaking?	☐	☐	☐	**X**
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	**X**
iv) Landslides?	☐	☐	☐	**X**
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	**X**	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	**X**
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	**X**
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	**X**
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	**X**

3.7.1 Regulatory Setting

Tahoe National Forest Land and Resource Management Plan

Tahoe National Forest Land and Resource Management Plan includes the following Minimum Management Requirements (MMRs) and Forestwide policies for geology and soils:

- **Soil and Water Productivity.** soil and water resources and do not significantly or permanently impair land productivity disturbance on lands characterized by over-steepened slopes, very high erosion potential, or high to no more than 5 percent per decade to avoid soil loss, activation of mass failures, and degradation of water quality.

- **Geology.** Complete the Forest Geologic Resources (and hazards) Inventory and use it to make preliminary assessments of impacts and needed on land-disturbing activities and to and analyze potential geologic resources. Conduct project-specific geologic and/or geotechnical investigations on projects that have the potential to initiate or accelerate slope movements, be adversely affected by fault zones, or impact groundwater quallty or quantity.

- **Soils.** As determined through project analysis, improve soil productivity on forest land currently significantly altered.

3.7.2 Environmental Setting

Regional Geology

The project site is located along the western slope of the Sierra Nevada Geomorphic Province. The Sierra Nevada Geomorphic Province is a tilted fault block nearly 400 miles long. Its east face is a high, rugged multiple scarp in contrast with the gentle western slope, which disappears under sediments of the Great Valley. Deep river canyons are cut into the western slope. Their upper courses, especially in massive granites of the higher Sierra Nevada, are modified by glacial sculpturing, forming such scenic features as the Yosemite Valley. The high crest culminates in Mount Whitney, with an elevation of 14,495 feet above sea level near the eastern scarp. The metamorphic bedrock contains gold-bearing veins in the northwest trending Mother Lode. The northern Sierra Nevada boundary is marked where bedrock disappears under the Cenozoic volcanic cover of the Cascade Range (CGS 2002).

Local Geology, Soils, and Topography

The project site is located in the U.S. Geological Survey (USGS) Westville and Michigan Bluff 7.5-minute quadrangles (USGS 2025). The China Wall SA is underlain by tertiary pyroclastic and volcanic mud flow deposits (Tv^p, CDOC 2015). Soils at the staging area are mapped as *MCE*-McCarthy-Ledmount-Crozier complex, 2 to 30 percent slopes; *MCE5*-McCarthy-Ledmount-Crozier complex, 2 to 30 percent slopes, alter ed; and *MCG*-McCarthy-Ledmount-Crozier complex, 30 to 75 percent slopes (NRCS 2025). The staging area is relatively level, ranging from approximately 5,029 to 5,041 feet in elevation.

The dominant soils present along the Loop 5 reroutes are mapped as *CTG*-Crozier-McCarthy-Cohasset complex, 30 to 75 percent slopes, N Mid Montane, *CTE*-Crozier-McCarthy-Cohasset complex, 2 to 30 percent slopes, *CTE5*-Crozier-McCarthy-Cohasset complex, 2 to 30 percent slopes, altered, *DEG*-Deadwood-Rock outcrop-Hurlbut complex, 30 to 70 percent slopes, *CUG*-Crozier-Mariposa-Cryumbrepts, wet complex, 30 to 75 percent slopes, and *MAG*-Mariposa-Jocal complex, 30 to 75 percent slopes, N Mid Montane (NRCS 2025).

The approximate elevations of Loop 5 trail segments to be rerouted are as follows: The segment located northeast of China Wall SA (see Figure 2-7) ranges from 4,827 to 5,401 feet. The segment located northwest of China Wall SA (see Figure 2-8) ranges from 4,622 to 3,652 feet. The segment located east of China Wall SA (see Figure 2-9) ranges from 4,183 to 5,028 feet.

The dominant soils present along the Loop 6 reroutes are mapped as *MCG*-McCarthy-Ledmount-Crozier complex, 30 to 75 percent slopes*, CTG*-Crozier-McCarthy-Cohasset complex, 30 to 75 percent slopes, N Mid Montane, and *HUG*-Hurlbut-Deadwood-Rock outcrop complex, 30 to 75 percent slopes (NRCS 2025). The portion of Loop 6 that is to be rerouted ranges from 3,710 to 4,793 feet in elevation (see Figure 2-10).

3.7.3 Discussion

Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

No Impact (Responses a[i] – a[iv]). Although California is a seismically active region, the project site is not in an area with significant seismic hazards. There are no Alquist-Priolo Earthquake Fault Zones in the project area. The closest fault to the project site is the Giant Gap Fault, located approximately 3.3 miles west of Loop 5 at its closest point to the project site (CDOC 2025). The project site is not within an area of strong seismic ground shaking (CGS and USGS 2016). The project site is not within a seismic hazard zone for seismic-related ground failure, including liquefaction, or for landslides (CDOC 2025). The proposed project is the expansion of an existing OHV staging area and rerouting of steep sections of two existing OHV loop trails. Project activities would not have the potential to exacerbate existing geologic conditions such as seismic-related ground failure, liquefaction, or landslides, or be likely to adversely affect existing geological conditions because the staging area expansion and trail reroutes do not involve new major structures or earthmoving, and the site does not contain geologic hazards.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The proposed project would not result in substantial soil erosion or loss of topsoil. Expansion of the existing staging area would result in temporary soil disturbance on and adjacent to the project site. The rerouting of Loops 5 and 6 would reduce soil erosion on the already heavily eroded trail segments. Standard Management Requirements incorporated into the project to avoid or minimize erosion include stopping operations during periods of inclement weather and implementing temporary erosion control measures; contouring work sites to allow for natural sheet flow and infiltration into the soil; ensuring an Erosion Control Plan is in place prior to start of construction; dust abatement measures; and trail construction BMPs (see Table 2-1 for more detail). Further, one specific purpose of the Loops 5 and 6 Reroutes is to reduce trail erosion. (section 2.3 Project Objectives and Need). Therefore, the project is expected to reduce existing erosion in the project area over the long term.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact. As stated in response to Question a above, the project site is not in a seismic or geologic hazard area subject to landslides or liquefaction (CDOC 2025). Lateral spreading involves the lateral movement of a liquefied soil layer (and overlying layers) toward a free face and is caused by seismic shaking. Therefore, as the project area is not in a liquefaction hazard area, the risk of lateral spreading is also low.

Subsidence is the sinking of the Earth's surface in response to geologic or man-induced causes. Subsidence is primarily caused by groundwater extraction, aquifer-system compaction, drainage of organic soils, underground mining, hydro-compaction (i.e., shallow soil subsidence from adding water), natural compaction, sinkholes, and thawing permafrost (NOAA 2025). None of these causes of subsidence apply to the project area, and the project is not expected to result in on- or off-site subsidence. The expansion of the existing staging area and trail reroutes are surficial in nature and does not have the potential to become unstable resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Project activities would not exacerbate geologic unit or soil stability conditions.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soil or clay is considered to be one of the more problematic soils, and it causes damage to various structures because of its swelling and shrinking potential when it comes into contact with water (Patel 2019). As described above, the dominant soils within the project site include McCarthy-Ledmount-Crozier complex, Crozier-McCarthy-Cohasset complex, Deadwood-Rock outcrop-Hurlbut complex, Hurlbut-Deadwood-Rock outcrop complex, and Mariposa-Jocal complex (NRCS 2025), which do not have a high clay content typical of expansive soil. The proposed project is the expansion of an existing OHV staging area and reroutes of two existing loop trails. The project does not include building foundations that could become unstable due to expansion, creating a substantial risk to life or property. Project activities would not exacerbate expansive soil conditions.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed project includes the installation of a new double-vault toilet that would be periodically emptied by a service truck. The project does not propose the installation of septic tanks or alternative wastewater disposal systems.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Fossils form in certain sedimentary rocks, such as limestone, shales, or sandstones (Walters 2023). The project area is underlain by volcanic rock (CDOC 2025), and no fossils have been mapped in the project area (Macrostat 2025). In addition, the proposed expansion of the staging area and trail reroutes would not require extensive excavation or grading to construct. Therefore, the proposed project is not expected to impact paleontological resources. No unique geologic features are present in the project area.

3.8 GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	**X**	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	**X**

3.8.1 Regulatory and Environmental Setting

Gases that absorb and emit infrared thermal radiation (heat) in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). There are many compounds present in the Earth's atmosphere which are GHGs, including but not limited to water vapor (H_2O), carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). GHGs allow solar radiation (sunlight) to enter the atmosphere freely. When solar radiation strikes the earth's surface, it is either absorbed by the atmosphere, land, and ocean surface, or reflected back toward space. The land and ocean surface that has absorbed solar radiation warms up and emits infrared radiation toward space. GHGs absorb some of this infrared radiation and "trap" the energy in the earth's atmosphere. Entrapment of too much infrared radiation produces an effect commonly referred to as the "Greenhouse effect." Human activities since the beginning of the Industrial Revolution (approximately 1750) have increased atmospheric GHG concentrations. Average global surface temperatures have risen as a result of GHG emissions. This increase in globally averaged surface temperatures is commonly referred to as "Global Warming," although the term "Global Climate Change" is preferred because effects associated with increased GHG concentrations are not just limited to higher global temperatures.

GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change.

Scoping Plan

The CARB Scoping Plan is the comprehensive plan primarily directed at identifying the measures necessary to reach the GHG reduction targets stipulated in AB 32. First adopted in 2009, the Scoping Plan has undergone several iterations with the most recent update occurring in 2022. The 2022 Scoping Plan presents a scenario and strategy for California to meet the State goal of reducing GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045 (CARB 2022).

Placer County APCD's *Review of Land Use Projects under CEQA Policy,* adopted in 2016 and amended in 2021, establishes the thresholds of significance for criteria pollutants and GHGs. This policy also establishes the review principles, which serve as guidelines for the Placer County APCD staff when acting as a commenting agency in the review of environmental

documents prepared by lead agencies (Placer County APCD 2021). The environmental analysis presented below uses the Placer County APCD thresholds of significance to evaluate the proposed project's GHG emissions levels.

3.8.2 Discussion

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The proposed project's GHG construction emissions were estimated using the same methodology (CalEEMod) employed to estimate criteria air pollutant emissions (see Section 3.3.2) The estimated emissions, shown in Table 3-5, is well below the GHG threshold set by the Placer County APCD (Placer County APCD 2017); this impact would be less than significant.

Table 3-5. Project Construction GHG Emissions Estimates

Project Emissions	Placer County APCD Bright-line Threshold	Threshold Exceeded
22.4 tons CO_2e	10,000 ($MTCO_2e$/yr)	No

Source: MIG 2024

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The project would not conflict with an applicable plan, policy, or regulation adopted for reducing GHG emissions. Construction vehicle and equipment GHG emissions are identified and planned for in CARB's GHG emissions inventory and 2022 Scoping Plan Update, which contains measures designed to achieve the state's GHG reduction goals outlined in SB 32 (2030 GHG reduction goal) and AB 1279 (2045 carbon neutrality goal). Further, the project would not contain any activities or emissions sources that are subject to state or federal GHG permitting or reporting regulations.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	**X**	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	**X**	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	**X**
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	**X**
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	**X**
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	**X**
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	**X**	☐

3.9.1 Regulatory Environmental Setting

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. Chemical and physical properties such as toxicity, ignitability, corrosivity, and reactivity, cause a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, Sections 66261.20-66261.24. A “hazardous waste” is any hazardous material that is discarded, abandoned, or to be recycled. The criteria that render a material hazardous also make a waste product hazardous (California Health and Safety Code § 25117). According to this definition, fuels, motor oil, and lubricants in use at a typical construction site and airborne lead built up along roadways could be considered hazardous. No hazardous materials are currently used or stored at the China Wall SA, other than small amounts of fuel and fluids for street legal vehicles and OHVs.

3.9.2 Discussion

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact (Responses a – b). Project construction would involve the use of hazardous fuels and fluids in the short-term; however, standard management requirements incorporated in the project would prevent significant hazards to the public or the environment from hazardous materials used during construction. These measures include refueling equipment at least 300 feet away from water; a spill prevention and response plan; immediate containment of hazardous spills in water; and BMPs for trail design (see Table 2-1 for more detail). In addition, all hazardous construction materials would be transported, used, and disposed of in accordance with applicable federal, state, and local regulations.

After construction, the project would not involve the routine transport, use, or disposal of hazardous materials over the long-term. The use of hazardous materials during the operational phase of the project would be limited to small quantities of cleaning fluids for the vault toilets and fuels for trail maintenance equipment that would not be stored or disposed of onsite and would be used in accordance with applicable regulations.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or hazardous waste within one-quarter mile of an existing or proposed school?

No Impact. The project site is in the TNF and there are no existing or proposed schools within one-quarter mile of the site. The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or hazardous waste.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. No hazardous material sites are known to occur on or near the project site. The project site is not included on any list compiled pursuant to Section 65962.5 of the California Government Code (DTSC 2024). According to the State Water Resources Control Board Geotracker map, there are no hazardous materials sites within one mile of the project site (SWRCB 2024). Therefore, the project would not create a hazard to the public or the environment due to hazardous materials sites.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The project site is not located within an airport land use plan area or within two miles of a public or public use airport. The nearest airport, Blue Canyon - Nyack Airport, is approximately eight miles north of China Wall SA.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed project is the expansion of an existing OHV staging area and rerouting of existing trail loops. Primary access to the project site is on Foresthill Road. Foresthill Road connects to SR 80 approximately 30 miles west of the project site. There are no established emergency evacuation routes at the project site. The project would not impair implementation of or physically interfere with an existing emergency response plan or emergency evacuation plan.

g. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires?

Less Than Significant Impact. The project site is in a forested area where wildland fires may occur but is not located in a very high fire hazard severity zone (see section 3.20 Wildfire). The proposed project is the expansion of an existing OHV staging area and rerouting of loop trails that would continue to serve existing visitor use. The project does not propose habitable structures or new land uses which would introduce new fire hazards or exacerbate existing wildland fire hazards. Building materials include pavement, signs, double-unit concrete vault toilet; and two bear proof garbage cans; which are not highly flammable. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	**X**	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	**X**	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	**X**	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	**X**	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	**X**	☐
iv) Impede or redirect flood flows?	☐	☐	**X**	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	**X**
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	**X**	☐

3.10.1 Regulatory Setting

Federal Clean Water Act, Section 402

The Clean Water Act (CWA) is the primary federal legislation governing water quality and forms the basis for several state and local laws throughout the nation. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The CWA authorizes the EPA to regulate water quality in California by controlling the discharge of pollutants to water bodies from point and non-point sources through the National Pollution Discharge Elimination System (NPDES). The State and Regional Water Quality Control Boards (RWQCBs) entered into an agreement with the Forest Service that requires the agency to control non-point source discharges by implementing control actions certified by the State Board

as BMPs. BMPs are designed to protect water quality including sediment, turbidity, and water temperature. All project activities would meet all applicable BMPs.

Tahoe National Forest Land and Resource Management Plan

Tahoe National Forest Land and Resource Management Plan includes the following Minimum Management Requirements (MMRs) and Forestwide policies for hydrology and water quality:

- **Soil and Water Productivity.** soil and water resources and do not significantly or permanently impair land productivity disturbance on lands characterized by over-steepened slopes, very high erosion potential, or high to no more than 5 percent per decade to avoid soil loss, activation of mass failures, and degradation of water quality.
- **Water.** Maintain water quality where it meets or exceeds State objectives. Strive to improve water where it is below State objectives. Protect established snow and related hydrometeorological data sites from disturbances that will affect snow accumulation or measurement. Implement Best Management Practices (BMPs) to meet water qualty objectives and to maintain and improve the quality of surface water on the Forest. Methods and techniques for applying the BMPs will be identified during project-level environmental analyses and incorporated into the associated project plan and implementation documents. Reduce sediment from treatable but deteriorating lands. Limit intensive management on about 11,500 acres identified in a declining hydrologic condition. Allow this land to recover naturally. In all alternatives, protect and restore the deteriorating Carman Valley Watershed.

3.10.2 Environmental Setting

The China Wall SA and Loop 5 are in the North Fork American River Watershed, and Loop 6 is in the Middle Fork American River Watershed (Placer County 2022). No streams or drainages occur in or adjacent to the China Wall SA, but Loop 5 crosses Humbug Creek (a tributary of the North Fork of the American River) and Loop 6 crosses Indian Creek (a tributary of the Middle Fork of the American River).

The North Fork of the American River is 85 miles long, and its watershed encompasses 287 square miles. It begins at an elevation of over 7,000 feet in eastern Placer County in the TNF and flows westward through remote wilderness areas. It flows freely until being impounded by a small debris dam, Clementine (North Fork Reservoir), immediately north of the Foresthill Bridge. Four miles downstream from the dam, it is joined by the Middle Fork and meanders past the site of the abandoned Auburn Dam before reaching the Folsom Reservoir. It is eligible as a National Wild and Scenic River upstream of the Clementine debris dam (The American River 2024).

The Middle Fork of the American River is 65 miles long, and its watershed covers 312 square miles. It originates west of Lake Tahoe in the Granite Chief Wilderness Area, and its tributaries flow through the Tahoe and El Dorado National Forests. It flows west-southwest from its headwaters through French Meadow Reservoir, interspersed with man-made reservoirs, and receives the Rubicon River before joining the North Fork. Twenty-three miles of the Middle Fork American are eligible for National Wild and Scenic River status (The American River 2024).

3.10.3 Discussion

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. Project construction would cause temporary ground disturbance that could result in erosion and sedimentation at the project site, and use of the rerouted trails could cause erosion and sedimentation if they are not properly designed and maintained. Construction would also include construction fuels and fluids that could result in leaks or accidental spills affecting surface and groundwater at the project site. However, standard management requirements are incorporated in the project to avoid or minimize impacts to water quality. These measures include refueling equipment at least 300 feet away from water; a spill prevention and response plan; stopping work during inclement weather and implementing temporary erosion control; contouring all work sites to allow for natural sheet flow and infiltration into the soil; an Erosion Control Plan; dust abatement measures; immediate containment of hazardous spills in water; and stream crossing and trail drainage measures to minimize erosion and sedimentation on trails (see Table 2-1 for more detail). Further, one specific purpose of the Loops 5 and 6 Reroutes is to reduce trail erosion and sedimentation (Section 2.3 Project Objectives and Need). The trail reroutes would continue to be monitored and maintained after project completion but are expected to have reduced maintenance requirements because they would not be as steep or erodible as the existing trail segments. Therefore, impacts would be less than significant because the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The project would add approximately 1.5 acres of impervious surface area to the existing paved one-acre China Wall SA. However, standard management requirements incorporated in the project include contouring all work sites to allow for natural sheet flow and infiltration into the soil (see Table 2-1 for more detail). The Loops 5 and 6 Reroutes would not include any new impervious surface area as the trail reroutes would be dirt trails, and thus would not interfere with groundwater recharge. The project would not utilize groundwater. Therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge; project impacts would be less than significant.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site;

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv) Impede or redirect flood flows?

Less Than Significant Impact. (Responses c[i] – c[iv]). The proposed project would not alter the course of a stream or a river. There are no streams or rivers on or adjacent to the China Wall SA, and thus the expansion of the staging area would not alter the course of a stream or a river. The Loops 5 and 6 Reroutes include stream crossings of Humbug and Indian Creeks, tributaries to the North and Middle Forks of the American River; respectively. Standard management requirements incorporated into the project include measures to minimize impacts of trail stream crossings (see Table 2-1 and Section 2.6.2 for more detail), and the reroutes would not alter the course of any streams or rivers.

The proposed project would not result in substantial erosion or siltation on- or off-site. Standard Management Requirements incorporated into the project to avoid or minimize erosion include stopping operations during periods of inclement weather and implementing temporary erosion control measures; contouring work sites to allow for natural sheet flow and infiltration into the soil; ensuring an Erosion Control Plan is in place prior to implementation; dust abatement measures; and trail construction BMPs (see Table 2-1 for more detail). Further, one specific purpose of the Loops 5 and 6 Reroutes is to reduce trail erosion (Section 2.3 Project Objectives and Need).

The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. As described in response to Question b above, the project would add approximately 1.5 acres of impervious surface area to the existing paved one acre to China Wall SA, but site drainage measures incorporated into the project would ensure that the new impervious surface area would not substantially alter the drainage pattern of the site or area or cause on- or off-site flooding. The Loops 5 and 6 Reroutes would not include any new impervious surface area and would include design measures for trail drainage and therefore would not cause flooding on- or off-site.

The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. There are no existing or planned stormwater drainage systems in the project area, and water quality protection and site drainage measures incorporated into the project would ensure that the new impervious surface area would not provide substantial additional sources of polluted runoff (see Question a above and/or Table 2-1 for more detail).

The project would not impede or redirect flood flows. The project site is not within a flood zone (FEMA 2018). The project does not propose buildings or structures that could impede or redirect flood flows.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The project site is not in a flood hazard zone (FEMA 2024). In addition, the project is not near the coast or a large body of water and thus is not at risk of inundation by tsunami or seiche.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. The project would not conflict with the Water Quality Control Plan for the Lahontan Region (Lahontan RWQCB 2021) with the standard management requirements incorporated in the project (see Section 2.6). No sustainable groundwater management plan applies to the project area (SWRCB 2025). See responses to Questions a through c above regarding the potential impacts of the project on water quality and groundwater. All impacts were found to be less than significant.

3.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	**X**
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	**X**

3.11.1 Regulatory Setting

Tahoe National Forest Land and Resource Management Plan

Every national forest is required to have a land management plan (forest plan) that is consistent with the National Forest Management Act of 1976 (16 U.S.C. 1604) and other laws. A forest plan guides the management of a national forest by establishing long-range goals, objectives, and standards for resource protection, use, and maintenance, while balancing multiple uses and addressing local, regional, and national issues. The Tahoe National Forest Land Management and Resource Management Plan (USFS 1990) was designed to increase environmental protection while maintaining timber and grazing outputs near existing levels. The Forest Plan established a high level of protection for wildlife, riparian areas, soil productivity, water quality, and visual quality; provided for a mix of resource uses in former roadless areas; managed highly productive lands for timber; managed lands with high recreation values for a variety of recreation activities; and allowed for expansion of existing ski areas and development of new ski areas.

Sierra Nevada Forest Plan Amendment

The Sierra Nevada Forest Plan Amendment (USFS 2004) amended the Land and Resource Management Plans for the eleven National Forests in the Sierra Nevada range to improve protection of old forests, wildlife habitats, watersheds and communities in the Sierra Nevada and Modoc Plateau. The 2004 Amendment included long-term monitoring studies for several species and updated operational activity limitations to continue providing consistent, reliable, mitigation for all life stages of the California spotted owl while also providing for a balanced use of the National Forest resources.

Sierra Nevada Forests Management Indicator Species Amendment

The Forest Service must select species as Management Indicator Species (MIS), one of a variety of elements to address National Forest Management Act requirements related to diversity of plant and animal communities. Species are selected as MIS because their population changes may indicate the effects of land management activities. The purpose of the Sierra Nevada Forests Management Indicator Species Amendment (USFS 2007) was to correct deficiencies in the prior MIS lists to improve the effectiveness of those lists to meet their intended purpose, and to improve economic efficiency to make MIS monitoring affordable, and hence, more implementable. The Amendment applies to ten National Forests in the Sierra Nevada, including TNF.

3.11.2 Environmental Setting

The project site is located on federal forest land adjacent to Foresthill Road. There is no existing housing in the project area. The closest town to the project site is Foresthill, located about 12 miles southwest of China Wall SA.

3.11.3 Discussion

Would the project:

a. Physically divide an established community?

No Impact. The proposed project is the expansion of an existing OHV staging area and rerouting of single-track trail loops within a national forest. The project would not physically divide an established community, as the project site is located within the TNF, and there are no established communities in or adjacent to the project area.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. According to the OHV SA and Expansions EA (USFS 2013) and the Big Sugar Project EA (USFS 2019), the proposed actions (including the China Wall SA Expansion and the Loops 5 and 6 Reroutes) are consistent with the Tahoe National Forest Land and Resource Management Plan (1990) as amended by the Sierra Nevada Forest Plan Amendment (2004) and the Sierra Nevada Forests Management Indicator Species Amendment (2007). The project site is on federal land and no other land use plan applies to the project area (such as a local general plan). Therefore, the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation.

3.12 MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	**X**
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local -general plan, specific plan or other land use plan?	☐	☐	☐	**X**

3.12.1 Regulatory Setting

General Mining Law of 1872

The General Mining Act of 1872 declared all valuable mineral deposits in land belonging to the United States to be free and open to exploration and purchase. This law provides citizens of the United States the opportunity to explore for, discover, and purchase certain valuable mineral deposits on federal lands that are open for mining location and patent (open to mineral entry) (US Department of the Interior 2025).

3.12.2 Environmental Setting

The TNF has a total of 19,701 mining claims, of which 2,195 are active and 17, 506 are closed (The Diggings 2024). Gold is the most common mineral mined, but chrome, silver, magnesium, and other minerals have also been found on the Forest. Aggregate materials and quarried rock are occasionally extracted from the TNF. According to the CDC Mines Online Map, there are no active or abandoned mines on or near the project site (CDOC 2016).

3.12.3 Discussion

Would the project:

a. **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

b. **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact (Responses a – b). No important mineral resources would be removed from the project area, nor would the availability of any mineral resources be affected by the proposed project.

3.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	**X**	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	**X**	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	**X**

3.13.1 Regulatory and Environmental Setting

Noise is defined as unwanted sound, with sound being a detectable vibratory disturbance. On a seasonal basis, sounds of vehicle engines are common in the project area and vicinity. The project site is in TNF and is not located near sensitive receptors such as residences and schools. The TNF Land and Resource Management Plan does not address noise for non-wilderness areas such as the project site (USFS 1990).

3.13.2 Discussion

Would the project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable standards of other agencies?

Less than Significant Impact. Noise levels would temporarily increase during construction due to the use of heavy equipment. However, there are no sensitive receptors in the vicinity of the project site that would be affected by heavy equipment noise. The nearest residences, schools, and hospitals are all over 2.5 miles away from the China Wall SA Expansion project area, where the loudest construction equipment would operate. The trails accessed by the China Wall SA are not a noise sensitive use, as they are designed for OHV use, and would therefore not be impacted by any increases in ambient noise that could result from project construction.

b. Generation of excessive groundborne vibration or groundborne noise levels?

No Impact. Localized ground vibrations may occur during expansion of the staging area due to the use of heavy equipment. However, there are no sensitive receptors or structures in the vicinity of the project site that would be affected by groundborne vibration or groundborne noise.

The trail reroutes would involve a small trail dozer (18-24" width), a micro-excavator, and hand construction tools, which would not be expected to produce substantial levels of vibration.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project area is not located within two miles of a public airport or private airport or airstrip. The nearest airport, Blue Canyon - Nyack Airport, is approximately eight miles north of China Wall SA.

3.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	**X**
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	**X**

3.14.1 Environmental Setting

There is no existing housing in the project area. The closest town to the project site is Foresthill, located about 12 miles southwest of the site.

3.14.2 Discussion

Would the project:

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The project proposes to expand the China Wall SA and reroute steep sections of Loops 5 and 6. The purpose of the project is to meet existing parking demand at the staging area during high use periods, as well as improve the riding experience, and enhance user safety. The proposed project would not induce substantial unplanned population growth in the project area, either directly or indirectly, as the project does not propose any development that would result in unplanned population growth such as new housing or businesses or the extension of nearby roads.

b. Displace substantial numbers of people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project would not displace any housing or people as it does not involve the removal of existing housing.

3.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☐	**X**
ii) Police protection?	☐	☐	☐	**X**
iii) Schools?	☐	☐	☐	**X**
iv) Parks?	☐	☐	☐	**X**
v) Other public facilities?	☐	☐	☐	**X**

3.15.1 Environmental Setting

The TNF fire management program provides fire protection to the project area (USFS 2025). Law enforcement is provided in the TNF by Forest Service Rangers and the County Sheriff's Departments. The project area is national forest land and there are no schools, parks, or other urban public facilities in the area.

3.15.2 Discussion

Would the project:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?

ii) Police protection?

iii) Schools?

iv) Parks?

v) Other public facilities?

No Impact (Responses a[i] – a[v]). The proposed project is the expansion of an existing OHV staging area and the reroute of existing OHV trails. The project would not induce population growth or significantly increase recreational demand in the project area (see response to Question a in Section 3.14 Population and Housing). Therefore, the project would not increase the demand for public services and facilities compared to existing conditions. The project is not expected to increase risks to people or structures from wildfires as the project does not involve the development of habitable structures. (see response to Question h in Section 3.9 Hazards and Hazardous Materials). The project is not expected to increase crime or the need for police

protection. The project site is on Forest Service land, and there are no permanent residents in the project area that require schools, parks, or other public facilities.

3.16 RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	**X**
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	**X**	☐

3.16.1 Regulatory Setting

Multiple Use Sustained Yield Act of 1960

The Multiple Use Sustained Yield Act of 1960 addresses the establishment and administration of national forests to provide for multiple use and sustained yield of products and services, including recreation, range, timber, watershed, and wildlife and fish purposes. The Act augments Title 16, Chapter 2 of the U.S. Code.

Tahoe National Forest Land and Resource Management Plan

Tahoe National Forest Land and Resource Management Plan includes the following Forestwide policy for recreation:

- **Recreation.** Continue to manage existing sites for developed recreation. Charge fees where allowed by law. Favor OHV trail development over indiscriminate cross-country use.

3.16.2 Existing Setting

TNF is an increasingly popular recreation destination for multiple user groups. The TNF is located in the Sierra Nevada between the metropolitan areas of Sacramento, California, and Reno, Nevada, within one hour travel time of 2.5 million people. The TNF is also a recreational destination for residents of the San Francisco Bay Area (population of about seven million people), an approximate 3-hour drive away. Encompassing an area of over 1,178,000 acres, with approximately 838,777 acres being USFS lands, TNF has both OHV and OSV managed programs (USFS 2024a).

Foresthill is a popular destination for OHV and OSV riding. There are approximately 90 miles of designated OHV trails on the ARRD, as well as 60 miles of designated over snow routes, popular for snowmobile riding and other snow activities. The China Wall SA serves as a staging area for the Foresthill OHV trail system, and during winter it serves as a staging area for OSV recreation. Loops 5 and 6 are accessible from the China Wall SA and provide single track trails for motorcycle riders. During prime riding times, staging areas are at full capacity, and during optimal riding season (spring, early summer and fall), routine OHV patrols have observed 500 to 600 riders per week using the Foresthill OHV trail system (USFS 2024a).

3.16.3 Discussion

Would the project:

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed project is not located within an existing neighborhood or near a local or regional park, therefore the project would not impact neighborhood and regional parks. Additionally, the project is not expected to significantly increase recreational demand in the project area but is designed to meet existing demand for OHV recreation, reduce trail erosion and maintenance needs, and improve user experience (see response to Question a in Section 3.14 Population and Housing). The project would not increase visitor use in the TNF such that new recreational facilities would be needed, nor would the project intensify uses of other recreational facilities resulting in or accelerating physical deterioration of those facilities.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The proposed project includes the expansion of an existing OHV staging area and reroute of steep segments of existing OHV trails. Adverse physical effects on the environment from the project would be avoided through standard management requirements incorporated into the project (see Table 2-1).

3.17 TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	**X**
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	**X**	☐
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	**X**
d) Result in inadequate emergency access?	☐	☐	☐	**X**

3.17.1 Environmental Setting

Regional access to the project site is provided by I-80, an interstate highway that within California runs northeast from the San Francisco Bay Area to the Nevada border east of Truckee. Local access to the project site is provided by Foresthill Road, which connects to I-80 in Auburn and continues northeast for 31.8 miles to China Wall SA. The project site is surrounded by open forested areas, and there are no transit or bicycle facilities in the project area. The Foresthill OHV Area provides a system of recreational trails in the project area for OHV users. There are no pedestrian facilities in the project area except for the OHV trails, which are also open to non-motorized recreationists such as hikers and trail runners.

3.17.2 Discussion

Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. The proposed project is the expansion of an existing OHV staging area to accommodate existing demand for parking. The project also includes six trail reroutes that would reduce soil erosion, improve user experience, and enhance user safety. The project would improve circulation by providing an expanded parking area to access existing trails and by enhancing user safety on the rerouted trails. The expanded staging area is intended to relieve congestion within the staging area and reduce illegal parking along the adjacent roadway. The rerouted trails would also provide for a less steep hiking/running experience for pedestrians. The project would not affect the existing local or regional circulation system, including I-80, Foresthill Road, and the OHV trail network.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles traveled?

Less Than Significant Impact. The proposed project is the expansion of an existing OHV staging area and reroutes of existing OHV trails. The project is not expected to significantly

increase recreational demand in the project area (see response to Question a in Section 3.14 Population and Housing). Additionally, the project would not induce population growth, nor does it propose the building of new roads, or other land uses that have the potential to generate vehicle miles traveled (VMT). Project construction would require approximately 157 truck trips to construct the China Wall SA Expansion (Brownlee 2024), but the project is not expected to increase VMT over the long term. Therefore, the project would not conflict with CEQA Guidelines section 15064.3(b).

c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The proposed project would not include hazardous design features or incompatible uses. The China Wall SA is accessed from Foresthill Road and is not near any dangerous intersections, sharp curves, or busy roadways. The proposed project is the expansion of an existing staging area to meet existing demand for OHV recreation, and the reroutes of existing single-track trails. The project is compatible with existing recreational and natural resources management uses of the project area.

d. Result in inadequate emergency access?

No Impact. Project related work would not affect existing traffic patterns or emergency access routes. The project is being designed to Forest Service engineering standards, which includes appropriate access for emergency vehicles. The project would meet emergency vehicle access requirements such as road width, vertical clearance, turning radius, and turnarounds.

3.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	**X**
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	**X**	☐	☐

3.18.1 Regulatory Setting

Archaeological Resources Protection Act

The ARPA (16 USC §470aa-mm) prohibits the unauthorized excavation, removal, or damage of archaeological resources on federal and Indian lands and provides penalties for violations.

Native American Graves Protection and Repatriation Act

The NAGPRA (25 USC §§3001-3013) conveys to American Indians, of demonstrated lineal descendance, human remains and funerary or religious items that are held by federal agencies and federally-supported museums, or that have been recovered from federal lands. It also makes the sale of purchase of American Indian remains, “whether or not they derive from federal or Indian lands, illegal.”

Assembly Bill (AB) 52

AB 52 created a formal CEQA role for California Native American tribes by creating a formal consultation process and establishing that a substantial adverse change to a tribal cultural resource has a significant effect on the environment. Tribal cultural resources are defined as:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a) Included or determined to be eligible for inclusion in the California Register of Historical Resources

b) Included in a local register of historical resources as defined in PRC section 5020.1(k)

2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC section 5024.1 (c). In applying the criteria set forth in PRC section 5024.1 (c) the lead agency shall consider the significance of the resource to a California Native American tribe.

In addition, a historical resource described in PRC section 21084.1, a unique archaeological resource as defined in PRC section 21083.2(g), or a "non-unique archaeological resource" as defined in PRC section 21083.2(h) may also be a tribal cultural resource if it conforms with above criteria.

AB 52 requires a lead agency, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe; and, (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. AB 52 states: "To expedite the requirements of this section, the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area."

U.S. Forest Service Region 5 Programmatic Agreement Section 7.5

The USFS Region 5 Programmatic Agreement Section 7.5 highlights the importance of consultation with Indian Tribes and Native American Traditional Practitioners in the identification and evaluation activities conducted under the Programmatic Agreement (USDA and SHPO 2018). It stipulates that the Forest Supervisor shall ensure that consultation with Indian tribes and Native American Traditional Practitioners begins at the earliest stages of planning for an undertaking and continues throughout the process as appropriate. This section recognizes the important and unique role Indian tribes play in determining which properties the tribes assign traditional religious or cultural importance. Policy and guidance for guidance under this section is provided in Forest Service Manual 2360.

United States Forest Service Region 5 Programmatic Agreement Section 7.9

The USFS Region 5 Programmatic Agreement Section 7.9 stipulates that, in the event of inadvertent or unanticipated discoveries of human remains on Region 5's lands, the County Coroner be notified immediately in accordance with California Heal and Safety Code 7050.5(b), and if remains are determined to be Native American or Native American cultural items pursuant to NAGPRA are uncovered, the provisions of NAGPRA and its regulations at 43 CFR 10 and ARPA at 43 CFR 7 shall be followed on federal lands (USDA and SHPO 2018). If such remains or items are discovered off federal lands within California, for projects authorized by the Forest Service, the provisions of the California Native American Graves Protection and Repatriation Act (California Health and Safety Code 8010-8030, and California Public Resources Code 5097.98-99) shall be followed.

In addition to these outlined codes and regulations specific to Tribal Cultural Resources, the NHPA, NRHP, CRHR, CEQA, Health and Safey Code Sections 7050 and 7052, Penal Code Section 622.5, and Government Code Sections 6254(r) and 6250 *et seq.* also provide the

regulatory setting for Tribal Cultural Resources. See Section 3.5.1 for descriptions of these regulations.

3.18.2 Environmental Setting

The geographic region of the Sierra Nevada exhibits archaeological evidence of multi-season occupation going back millennia. The proposed project site in the northern Sierra within TNF is ethnographically known to have been inhabited by Hokan-speaking peoples since at least 6000 BCE, who are assumed to have entered California via the Plateau or Great Basin (Markley and Henton 1985). Later in time, speculatively during a period between 3000 BCE through 1000 CE, Penutian speakers entered California in as many as four different waves from the Great Basin and Plateau area. Within the area comprising TNF in the northern Sierra, this resulted in the establishment of two linguistically different groups: the Maidu, who were Penutian speakers, and the Hokan-speaking Washoe (Markley and Henton 1985). In addition to the Washoe and Maidu, the Nisenan tribe, often inaccurately referred to as “Maidu” or “southern Maidu,” is associated with the northern Sierra and the project area. A subgroup of California Penutian linguistic family along with Maidu and Konkow, the Nisenan are a separate Tribe with their own Cultural lifeways (Markley and Henton 1985; Wilson and Towne 1978; Nisenan 2025). The tribal territory of the Nisenan encompassed the Yuba and American river drainages and bordered the Miwok territory to the south. The presence of a significant number of widespread central California loanwords in Nisenan suggests a spread into non-Maiduan, mostly Miwok, territory in the past 1000 to 1200 years (Golla 2007). Archaeological studies reveal clusters of major villages near the project area, south of the North Fork of the American River (Wilson and Towne 1978).

Early Euro-American contact in the northern Sierra began in 1776 with exploration of Miwok territory by José Canizares and continued through the early 1800s. In 1808 Gabriel Moraga crossed into Nisenan territory. While there are no explicit records of Nisenan being removed and coerced into missions, the forced missionization of neighboring populations and introduction of beaver trapping in the region significantly disrupted Indigenous lifeways. Disruption was further exasperated by the great malaria epidemic that swept through the Sacramento Valley in 1832-1833 and diminished local native populations (Wilson and Towne, 1978; Bainbridge 2013).

While the Indigenous populations in the mountains were lesser affected by the epidemic and early settlers compared to valley populations, the discovery of gold in 1848 spared none. Lands of all elevations were overrun in a period of two to three years, resulting in widespread killing, destruction of villages, and the persecution of Indigenous peoples (Wilson and Towne 1978). The tragedy and violence would be further exacerbated by the discovery of gold in 1848.

In 1849, Washington sent two special emissaries to California to report on the nature of Mexico’s recognition of Indian land titles in California. The resulting report, ambiguous and inaccurate due to their lack of knowledge of Indian dialects, posed great disadvantages to the Indigenous peoples of the to-be state. Upon this misinformation, in conjunction with the attempt to stem the unprecedented chaos and violence of the gold miner’s confrontation with the California Indigenous peoples, Congress authorized three federal officials to make treaties with the California Indians, with the underlying purpose to extinguish Indian land titles and instead provide territories that would be protected by the western settlers. Through a series of under-represented treaty meetings consisting of crippling language barriers, 18 treaties were negotiated in 1852. As a part of these negotiations, signatory tribes promised to forever quitclaim to the United States their lands in return for the promise of assistance of farmers, school teachers, blacksmiths, stock animals, seeds and agricultural equipment, cloth, among others. These negotiations also bound the Indigenous population who had not attended the

treaty meetings or consulted on the terms. In all, the federal government promised to reserve 7,466,000 acres of land to the dispossessed peoples (Castillo 2025).

Further disenfranchising this demographic, the land grant commission established by Congress neglected to inform the California Indians of the requirements to validate their land claims. As a result, no claims were submitted, eventually resulting in the complete dispossession of the Indigenous peoples in the eyes of the government. While several tribes would violently and later legally contest these frauds to defend their territory, homes, and families, most tribes did their best to withdraw from all contact with the overwhelming chaos and violence (Castillo 2025).

Through the following decades, “a war of extermination” continued by the federal and state governments. Despite the provisions in the Treaty of Guadalupe Hidalgo (1848), Indigenous peoples were denied state citizenship, voting rights, and the rights to testify in court; forcedly removed from the ancestral lands so central to their culture and identify; and viciously and repeatedly attacked by the Western settlers. The aid promised in the treaty negotiations rarely came. Additionally, allocated reservation lands were often attacked, squatted on by White settlers, and stripped away by the government (Castillo 2025).

From the mid-19th to mid-20th centuries, the federal government introduced a series of policies that systematically stripped the Indigenous peoples of their rights, identity, and visibility. Policies providing for “salvation” introduced the era of acculturation under duress, forcibly divided reservation tribal lands, and sanctioned an indenture system. These policies imposed a system of private land ownership carved reservation lands into small, taxable parcels to be “doled out,” at the discretion of reservation agents, with the underlying intent of keeping tribal populations divided and politically impotent. In 1958, under the authority of the Rancheria Act, better known as Termination, all authorities over federal Indian reservations were transferred to the state. This statute allowed tribes to vote on a plan to divide communal tribal property into parcels to be distributed to its members, who would receive title to their lands and the freedom to sell it. These parcels were subject to property tax. Under the guise of economic independence and promises of significant improvements to infrastructure, education, and housing, twenty-three rancherias and reservations were terminated between 1958 and 1970. The results were catastrophic: chronically high unemployment rates, low educational achievements, and medical needs forced individuals to take on loans or sell their lands. Bureau of Indian Affairs (BIA) services like health and education were also abruptly ended. This policy ultimately divested small tribes of 10,037 acres of land, disrupted tribal institutions and traditions, and left the tribes more impoverished than ever (Castillo 2025).

The California Indian tribes fought against every one of these destructive policies, both physically and legally. Through physical resistance in the 19th century and legal battles in the late-19th through 20th centuries, the tribes relentlessly defended their lives and lifeways. In response to the effects of Termination, nearly 100 American Indian College students occupied Alcatraz Island in San Francisco Bay in 1969 and opened a new era of Indian affairs, comprising a new generation of young, energetic, and highly educated California Indians committed to protecting tribal sovereignty. They found great value in tribal traditions, encouraged traditional ceremonies, language retention, and exercise of tribal religious practices. In this new era, in recognition of the growing sophistication of California Indians, the state legislature created the NAHC in 1978, an all-Indian commission to function as a liaison between state, federal, and tribal governments. The NAHC since worked to protect Indian burials and sacred places, and to provide access to government lands to harvest native plants for ceremonial and other cultural practices (Castillo 2025).

Today, the peoples of Colfax-Todds Valley Consolidated Tribe, Nevada City Rancheria Nisenan Tribe, Susanville Indian Rancheria, Tsi-Akim Maidu of the Taylorsville Rancheria, United Auburn Indian Community of the Auburn Rancheria, Washoe Tribe of Nevada and California, and the Wilton Rancheria maintain their tribal and cultural affiliation with TNF. This list of tribes is identified by the NAHC for their affiliation with the China Wall area; additional tribes are likely affiliated with the broader reaching regions of TNF. Of the seven identified tribes, five are federally recognized (Colfax-Todds Valley Consolidated Tribe and Tsi-Akim Maidu of the Taylorsville Rancheria are non-federal). The tribal members of all the identified tribes are traditionally and culturally affiliated with the project area. The Tribes have a deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is the Tribal community's goal to ensure the preservation and continuance of their cultural heritage for current and future generations.

3.18.3 Discussion:

Would the project:

Cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. MIG conducted a Sacred Lands File (SLF) search through the NAHC. The search was initiated on November 26, 2024, and was returned with negative results on December 12, 2024. Tribal representatives were contacted by certified mail in December 2024 and by email, and by phone for those whose email addresses were unavailable, in February 2025 using the NAHC's contact list. Responses are described below under discussion (b). In sum, no Tribal Cultural Resources were identified within the project area or a 0.25-mile buffer zone. Because the SLF search was negative and no affiliated tribes who were contacted disclosed any California Register-eligible Tribal Cultural Resources, it may be presumed that no known eligible or listed resources (previously evaluated) are within the project area. Additionally, the four Pre-Contact resources identified in the NCIC CHRIS search have not been evaluated for significance per CRHR criteria and are therefore addressed under discussion (b).

See Mitigation Measure TRIB-1 under discussion (b) to stop work in the case of inadvertent, unanticipated discovery of potential Tribal Cultural Resources.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Less Than Significant Impact with Mitigation. As described above under discussion item (a), MIG conducted an SLF search through the NAHC on November 26, 2024, which was returned

with negative results on December 12, 2024. Tribal representatives were contacted by certified mail in December 2024 and by email, and by phone for those whose email addresses were unavailable, in February 2025 using the NAHC's contact list. Responses are described below. The letters, emails, and phone calls to tribal representatives requested pertinent information regarding tribal cultural resources in the project vicinity and included a description of the project and maps showing the project location, project boundary, and buffer, plus representative photos of the project site taken in 2024. The consultation letter also summarized the CHRIS record search, alerting the Tribes of the presence of four Pre-Contact resources within the project area and the 0.25-mile buffer zone, and the negative results from the SLF search. The Tribes contacted include the Colfax-Todds Valley Consolidated Tribe, Nevada City Rancheria Nisenan Tribe, Susanville Indian Rancheria, Tsi-Akim Maidu of the Taylorsville Rancheria, United Auburn Indian Community of the Auburn Rancheria (UAIC), Washoe Tribe of Nevada and California, and Wilton Rancheria. In sum, no Tribal Cultural Resources were identified within the project area or buffer, but the responses to outreach combined with the environmental setting and the results of the CHRIS records search described under Cultural Resources discussion in Section 3.5(b) indicate a level of sensitivity at the site for associated Tribes.

Colfax-Todds Valley Consolidated Tribe, United Auburn Indian Community of the Auburn Rancheria, and Wilton Rancheria confirmed receipt of the letters and email. The Colfax-Todds Valley Consolidated Tribe requested a site visit to the project area before vegetation growth and asked if there had been a cultural survey already conducted. The USFS District Archaeologist coordinated a site visit and reviewed the contents of a previous survey with the Cultural Preservation Representatives with the Tribe. The site visit was conducted on April 22, 2025. During the site visit with Matthew Brownlee (Public Services Staff Officer, Tahoe National Forest ARRD), Chelsie Brokenshire (District Archaeologist, Tahoe National Forest ARRD), and tribal representatives Sally Hicks and Michelle Roper, tribal representatives identified areas of cultural sensitivity that may be impacted by the proposed project. They proposed mitigation measures of avoidance and additional monitoring (Mitigation Measure TRIB-1, 2) to reduce this potential impact to less than significant.

> **Impact TRIB-1:** The proposed project construction could disturb and impact areas of cultural sensitivity, including both the ground and surrounding vegetation, along the new trail alignments.
>
> **Mitigation Measure TRIB-1:** Project activities shall avoid identified areas of cultural sensitivity as best possible, including vegetation. These actions include: 1) protection of as many elderberry trees during new trail construction along Loop 5 "West" (near Damascus); 2) avoid disturbance to the flat terrain by taking new trail alignment off the flat terrain sooner along Loop 5 "East" (near Red Point); and 3) establish extra wide buffer for avoidance from mechanized equipment along Loop 5 "Upper China Wall" (Humbug Ridge) and notify Tribe prior to implementation.
>
> **Impact TRIB-2:** The proposed methods to decommission the existing trail along Loop 6 (Mitchell Mine Road) could further disturb culturally sensitive sites.
>
> **Mitigation Measure TRIB-2:** Tribe shall be notified prior to implementation of trail decommission actions. Tribe may require monitor on site during the implementation of decommissioning the old trail segment.

UAIC requested the contact information for the lead agency to officially consult under AB 52. A meeting took place with the Cultural Regulatory Manager of the Tribe, the OHMVR Division contact, and MIG on February 7, 2025, during which time additional information was requested

by the Tribe to determine the necessity of a tribal survey. The original grant application package, with all associated graphics, was shared. The UAIC conducted background search for the identification of Tribal Cultural Resources for this project, which included a review of pertinent literature, historic maps, and a records search using UAIC's Tribal Historic Information System (THRIS). UAIC's THRIS database is composed of UAIC's areas of oral history, ethnographic history, and places of cultural and religious significance, including the UAIC Sacred Lands that are submitted to the NAHC. The THRIS resources shown in this region also include previously recorded indigenous resources identified through CHRIS, as well as historic resources and survey data. Upon review, the Tribal Historic Preservation Officer determined that a UAIC tribal survey was not warranted. However, unanticipated indigenous resources could be revealed and damaged during ground disturbance, which could cause an adverse change in the significance of the resource. The UAIC provided a mitigation measure for standard unanticipated discoveries (Mitigation Measure TRIB-3), that outlines an immediate work stoppage, protocol of notification, consultation process to identify the boundary of, preserve in place, or, if avoidance is infeasible, identify a reburial location in the proximity of the find where no further disturbance is anticipated. In the instance of the latter, guidance for the safe and respectful storage of the resource is provided. The USFS stipulations outlined under Section 3.5.3 further support this protective effort to stop work in case of inadvertent discovery. These mitigation measures would reduce this potential impact to less than significant.

The Cultural Preservation Department of Wilton Rancheria confirmed receipt of the letter and informed MIG that the project had been forwarded to THPO for review. The Tribe has since informed MIG that they would like to defer to UAIC.

Tsi-Akim Maidu of the Taylorsville Rancheria confirmed over telephone on February 6, 2025, that the China Wall project area was outside their affiliated Maidu area.

> **Impact TRIB-3:** Project construction could disturb or damage unknown Tribal Cultural Resources resulting in an adverse change in the significance of the resource.
>
> **Mitigation Measure TRIB-3:** If any suspected TCRs or resources of cultural significance to affiliated tribes as identified by the NAHC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resource specialist, or professional archaeologist.
>
> A Tribal Representative, the OHMVR Division, as CEQA Lead Agency, and the TNF shall be immediately notified. The Tribal Representative, in coordination with the Lead Agency and TNF, shall determine if the find is a TCR (PRC §21074), and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary.
>
> The culturally affiliated Tribe shall consult with the OHMVR Division and TNF to (1) identify the boundaries of the new TCR and (2) if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management, or (3) if avoidance is infeasible, a reburial location in proximity of the find where no future disturbance is

anticipated. Permanent curation of TCRs will not take place unless approved in writing by the culturally affiliated Tribe.

The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a Conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

The construction contractor(s) and TNF shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, upon request.

Any discoveries shall be documented on a CDPR 523 form within 2 weeks of the discovery and submitted to the appropriate CHRIS center in a timely manner.

Work at the TCR discovery location shall not resume until authorization is granted by TNF in coordination with the culturally affiliated Tribe.

If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the Placer County Coroner and the culturally affiliated Tribe shall be contacted immediately. Upon determination by the Place County Coroner that the find is Native American in origin, the NAHC will assign the Most Likely Descendent who will work with the project proponent to define appropriate treatment and disposition of the burials.

In addition to the process and outcome of AB52 consultation, the four Pre-Contact resources identified in the CHRIS records search are discussed in this section. These resources are listed in Table 3-6.

Table 3-6. Pre-Contact Resources within the Project Area

Resource Name	Resource Type
Hot Cakes	Site
Baby Cakes	Site
Weighty	Site
N/A	Site

All four identified resources are located in, or in the vicinity of the project area.

None of the consulting Tribes commented on these resources during the consultation process. Because these resources are located in the project area or within the 0.25-mile buffer zone, however, they could potentially be subject to disturbance or other impacts. The Big Sugar Project site encompasses the China Wall area, and the Big Sugar EA identifies standard management requirements for the project area, which are incorporated into this project, as outlined in Section 2.6.1.

Furthermore, should any additional Pre-Contact resources be uncovered during construction in TNF, the procedures as stipulated by Section 7.10 of the USFS Region 5 Programmatic Agreement with the California State Historic Preservation Officer (USDA and SHPO 2018) would be followed. The stipulation outlines the process of discoveries and inadvertent effects, requiring written notification to the Regional Heritage Program Leader and SHPO within two working days of discovery. The USFS would then consult with SHPO, the ACHP, and affiliated Tribes regarding the cultural and religious significance of the resource and any necessary treatment measures. Once resource evaluation is complete and standard protection measures are applied (if applicable) the project may resume.

Implementation of Mitigation Measure TRIB-4 would further ensure that the potential impact on these Pre-Contact resources would be less than significant.

> **Impact TRIB-4:** Project activities, including but not limited to construction, staging, ground disturbance, and retirement of the existing trail, could damage the identified resources resulting in an adverse change in the significance of the resource.
>
> **Mitigation Measure TRIB-4:** The areas of the identified resources shall be avoided in the staging and other construction-related activities to prevent further exposure and damage to the resources. Tribes shall be consulted to devise an appropriate trail retirement strategy that considers the protection of resources on and along the existing trail.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	**X**
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	**X**
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	**X**
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	**X**	☐
e) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	**X**	☐

3.19.1 Environmental Setting

The project site is on National Forest land and there are no existing water, wastewater, solid waste, electricity, gas, or telecommunications facilities or services in the project area. There is an existing double-unit restroom and a bear proof trash can at the China Wall SA. TNF staff frequently service the restrooms, and a contractor pumps the vault toilets periodically. Stormwater drainage in the project area is primarily through natural percolation in the soil or runoff to natural streams and drainages.

3.19.2 Discussion

Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact (Responses a – c). The proposed project is the expansion of an existing OHV staging area and reroutes of steep sections of Loops 5 and 6. The project would not include new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. The expanded staging area would not include water, lighting, natural gas, or telecommunication facilities. The project would not require water supplies or wastewater treatment. A new double vault toilet would be installed at the expanded China Wall SA, and the existing double vault toilet would be replaced, but neither would require a water supply or wastewater treatment. Trail construction standards and watershed, soils, and aquatic resources measures are incorporated in the project to ensure adequate drainage at the expanded staging area and along the trail reroutes (see Section 2.6).

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact (Responses d – e). The proposed project would not generate solid waste in excess of state or local standards or of the capacity of local infrastructure, nor otherwise impair attainment of solid waste reduction goals. Two bearproof garbage cans would be installed at the expanded staging area, but the proposed project is not expected to significantly increase recreational demand in the project area (see response to Question a in Section 3.14 Population and Housing), and therefore is unlikely to result in a significant increase in solid waste generated by recreationists. Solid waste generated during the short-term construction period is expected to be minimal. Trees removed would be chipped and spread on adjacent areas as mulch or decked in an area for the public to access for fuel wood and would not contribute to solid waste. The project would require minimal cut and fill and would not generate excess soil for off-site disposal. The project would comply with all applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

3.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	**X**
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	**X**
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts To the environment?	☐	☐	☐	**X**
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, Or drainage changes?	☐	☐	☐	**X**

3.20.1 Regulatory and Environmental Setting

The project site is in a forested area that could experience wildfires. The site is on federal property (National Forest) in a federal responsibility area and not within a state responsibility area (Cal Fire 2024). According to the USFS Wildfire Hazard Potential online map, China Wall is in an area of high wildfire hazard, and Loops 5 and 6 are in areas of high to very high wildfire hazard (USFS 2020). The closest fire station to the project site is Foresthill Fire Station 89, located about 12 miles southwest of China Wall on Foresthill Road.

3.20.2 Discussion

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The project site is not located in a state responsibility area; however, it is located on land classified as high to very high in wildfire hazard according to the USFS. The only evacuation route from the project site is on Foresthill Road, which connects to I-80 about 30 miles southwest of China Wall. There are no established emergency evacuation routes. The project would not impair an adopted emergency response plan or emergency evacuation plan, as there are no established emergency evacuation routes in the project area, and all construction activities would be short-term and confined to the project site. Emergency access to the project site would be maintained during construction, and the expanded China Wall SA would accommodate emergency vehicles.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The proposed project would not exacerbate the existing wildfire risks in the area due to slope, prevailing winds, or other factors. The project would expand an existing OHV staging area and reroute steep sections of Loops 5 and 6. The project would not introduce new land uses, new potential ignition sources, or changes in topography that could exacerbate wildfire risks and thereby expose site visitors to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The proposed project does not include structures for human habitation, proposed building materials (e.g., pavement, parking signage, bear proof trash cans, and vault toilet) are not highly flammable, and the rerouted trails would have more gradual slopes than the existing trails.

c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed project would expand China Wall and reroute steep sections of Loops 5 and 6. The project would not require the installation of roads, emergency water sources, power lines, or other utilities that would exacerbate wildfire risk or result in temporary or ongoing impacts to the environment.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. China Wall is relatively level and is not prone to wildfire induced landslides or post-fire slope instability. Large portions of Loop 6 burned in the Mosquito Fire in 2022, such that there are extensive areas with dead standing trees along the route. The Forest Service manages previously burned areas in and around Loops 6 for erosion and potential slope failures and would close trails or trail segments should there be any indication of post-fire slope instability. Any changes to drainage patterns from the Mosquito Fire have been managed by the Forest Service since 2022. With Forest Service management activities, the project would not expose people to post-fire slope instability hazards.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially 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, substantially 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?	☐	**X**	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	**X**	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	**X**

3.21.1 Discussion

a. Does the project have the potential to substantially 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, substantially 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?

Less Than Significant with Mitigation Incorporated. As explained in response to Question a in Section 3.4 Biological Resources, Mitigation Measures BIO-1, BIO-2, and BIO-3, and standard management requirements incorporated into the project would ensure impacts on biological resources are less than significant (see Section 3.4 and Table 2-1). With implementation of these requirements, the project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As explained in response to Question a in Section 3.5 Cultural Resources, no historical, archeological, or tribal/cultural landscape resources were identified in the project area in the cultural resources report prepared for the project by the TNF R2019051700067 (2019) or in the CHRIS search or SLF search performed to meet CEQA requirements. If any previously unknown cultural resources are discovered during project implementation, operations would cease until analysis is conducted and protections measures are implemented as needed consistent with the Cultural Resources Programmatic Agreement. Mitigation Measures TRIB-1

through TRIB-4 would reduce potential impacts on tribal cultural resources to less than significant levels. Therefore, the project would not eliminate important examples of the major periods of California history or prehistory.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The proposed project does not have impacts that are individually limited, but cumulatively considerable. The project is the expansion of the China Wall Staging Area to accommodate existing demand for OHV recreation in the project area and reroutes of steep sections of Loops 5 and 6 to reduce erosion and maintenance requirements and increase user safety and enjoyment. Standard management requirements incorporated in the project would avoid or minimize all potential impacts of the project (see Section 3.4 and Table 2-1). The Brimstone and Sugar Pine OHV Staging Areas completed in 2017 were found not to be growth inducing, but like the China Wall SA Expansion were designed to accommodate existing demand for OHV recreation and to formalize informal parking areas (MIG, Inc. I TRA Environmental Sciences 2016). The recently completed Robinson Flat to China Wall Connector Trail Project or Big Sugar Trail, a 24-mile connector route between Robinson Flat and the eastern side of Loop 5 has increased the use of China Wall and Loops 5 and 6. However, the CEQA document prepared for the Connector Trail found that the project would have no significant impacts on the environment (MIG, Inc. 2021). Therefore, the proposed project is not expected to result in cumulatively considerable impacts when combined with the recently completed Connector Trail Project. There are no other past, current, or probable future projects in the project area that could combine with the project to result in cumulatively considerable impacts.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. The project does not have environmental effects that would cause substantial adverse effects on humans, either directly or indirectly. The project is the expansion of China Wall and reroutes of steep sections of Loops 5 and 6. The project does not include structures for human habitation, hazardous materials, ongoing emissions, loud noises, or other features that could impact human beings. All potential project-related impacts on human beings would be less than significant with standard management requirements incorporated into the project (see Table 2-1).

Chapter 4. REFERENCES AND REPORT PREPARATION

4.1 REFERENCES

Bacon W.R. 1975. The Visual Management System of the Forest Service, USDA. Accessed March 27, 2025 at https://research.fs.usda.gov/treesearch/27639.

Bainbridge, David A. 2013. "The Hudson's Bay Company Brigades of 1832-33 and the Malaria Epidemic in California." In *The Fur War in the West: Ecological and Cultural Consequences*. Rio Redondo Press, San Diego, CA.

Brownlee, Matthew, Public Services Staff Officer, Tahoe National Forest, American River Ranger District, personal communication. November 14, 2024.

Calflora. 2024. Search for Plants: CNPS rare plants in Placer County. Accessed December 2024 at: https://www.calflora.org/search.html.

[Caltrans] California Department of Transportation. 2019. State Scenic Highway Map. Accessed March 27, 2025 at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

[Caltrans] California Department of Transportation. 2025. Scenic Highways - Frequently Asked Questions. Accessed March 27, 2025 at https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/lap-liv-i-scenic-highways-faq2.

[CARB] California Air Resources Board. Climate Change Scoping Plan – A Framework for Change. Endorsed by CARB December 2008. 2009. Accessed January 2024 at https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.

[CARB] California Air Resources Board. First Update to the Climate Change Scoping Plan Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006. 2014. Accessed January 2024 at http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.

[CARB] California Air Resources Board. 2017. 2017 Climate Change Scoping Plan.

[CARB] California Air Resources Board. 2021. *Appendix A Maps and Tables of Areas of Designations for State and National Ambient Air Quality Standards.* Last updated October 2021. Accessed on September 10, 2024 at https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/sad2022/appc.pdf.

[CARB] California Air Resources Board. 2022. 2022 Scoping Plan Update. November 16, 2022. Accessed May 28, 2024 at https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf.

[Cal Fire] California Department of Forestry and Fire Prevention. 2024. Fire Hazard Severity Zones in State Responsibility Area. Effective April 1, 2024. Accessed October 1, 2024 at https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008.

[CDOC] California Department of Conservation. 2016. Mines Online. Accessed December 6, 2024 at: https://maps.conservation.ca.gov/mol/index.html.

[CDOC] California Department of Conservation. 2015. Geologic Map of California. Accessed January 2, 2025 at: https://maps.conservation.ca.gov/cgs/gmc/.

[CDOC] California Department of Conservation. 2022. California Important Farmland Finder. Accessed December 4, 2024 at https://maps.conservation.ca.gov/DLRP/CIFF/.

[CDOC] California Department of Conservation. 2025. EQ Zapp: California Earthquake Hazards Zone Application. Accessed January 2, 2025 at https://www.conservation.ca.gov/cgs/geohazards/eq-zapp.

[CDFW] California Department of Fish and Wildlife. 2024a. Vegetation Classification and Mapping Program (Veg CAMP): Natural Communities. Accessed on December 2024 at: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

[CDFW] California Department of Fish and Wildlife. 2024b. BIOS Layer: Conservation Plan Boundaries, HCP and NCCP [ds760]. Accessed November 14, 2024 at: https://apps.wildlife.ca.gov/bios6/?al=ds760.

California Department of Transportation (CalTrans). 2025. State Scenic Highway Map. Accessed January 7, 2025 at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

[CEC] California Energy Commission. 2022a. “Electricity Consumption by County.” *Electricity Consumption by County.* CEC, Energy Consumption Database. n.d. Accessed September 11, 2024 at http://ecdms.energy.ca.gov/elecbycounty.aspx.

[CEC] California Energy Commission. 2022b. “Gas Consumption by County.” *Gas Consumption by County.* CEC, Energy Consumption Database. n.d. Accessed September 11, 2024 at http://ecdms.energy.ca.gov/gasbycounty.aspx.

[CEC] California Energy Commission. 2023. California Retail Fuel Outlet Annual Reporting (CEC-A15) Results.” Retail Fuel Outlet Survey Results. CEC, Energy Almanac, Gasoline Data, Facts, and Statistics. Accessed July 18, 2024. Web. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting.

[CGS] California Geological Survey. 2002 (December). California Geomorphic Provinces. Note 36. Accessed January 2, 2025 at https://www.conservation.ca.gov/cgs/Documents/Publications/CGS-Notes/CGS-Note-36.pdf.

[CGS and USGS] California Geological Survey and United States Geological Survey. 2016. Earthquake Shaking Potential for California. Map Sheet 48 (Revised 2016). Accessed January 3, 2025 at: https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_048.pdf.

[CNPS] California Native Plant Society. 2024. Inventory of Rare and Endangered Plants (7.0 and 9.0 online editions). Accessed December 2024 at http://www.cnps.org/inventory.

[CNDDB] California Natural Diversity Database. 2024. Rarefind 5.0. California Department of Fish and Wildlife. Accessed December 2024 at https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

Castillo, Edward D. 2025. “Short Overview of California Indian History.” Native American Heritage Commission. Accessed April 2025. https://nahc.ca.gov/native-americans/california-indian-history/.

Cornell Lab of Ornithology. 2024. eBird. Accessed December 2024 at: https://ebird.org/home.

[DTSC] California Department of Toxic Substances Control .2025. EnviroStor. Accessed September 23, 2025 at https://www.envirostor.dtsc.ca.gov/public/.

[EPA] Environmental Protection Agency. 2024. “8-Hour Ozone (2015) Nonattainment Areas by State/County/Area.” Data current as of August 31, 2024. Accessed on September 11, 2024 at https://www3.epa.gov/airquality/greenbook/jncty.html.

[EPA and NHTSA] Environmental Protection Agency and National Highway Traffic and Safety Administration. 2016. Medium- and Heavy-Duty Fuel Efficiency Standards. Accessed May 2019 at https://www.transportation.gov/briefing-room/epa-and-dot-finalize-greenhouse-gas-and-fuel-efficiency-standards-heavy-duty-trucks.

[FEMA] Federal Emergency Management Agency (FEMA). 2024. National Flood Insurance Program. Flood Insurance Rate Map. Placer County, CA. Map Number 06061C0250H. Originally published 2018. Revised June 2024.

Golla, Victor. 2007. “Linguistic Prehistory.” In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar. Alta Mira Press.

Google Earth Pro. 2024 (December). China Wall Staging Area and Loops 5 and 6, Placer County, CA 95631. 39°09’03”N, 120°40’37”W, Eye alt 5,000-20,000 ft. Google 2024. Accessed December 2024.

iNaturalist. 2024. Accessed December 2024 at: https://www.inaturalist.org/.

[Lahontan RWQCB] Lahontan Regional Water Quality Control Board. 2021. Water Quality Control Plan for the Lahontan Region. Plan effective March 31, 1995, including amendments effective August 1995 through September 22, 2021. Available at: https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html.

Macrostrat. 2025. Macrostrat Geological and Paleontology/Fossil Mapping Data. Accessed January 3, 2025 at https://macrostrat.org/map/layers#x=-120.6772&y=39.1516&z=15&show=satellite,columns,geology.

Markley, Richard and Gregory Henton. 1985. *Cultural Resources Overview Part I: Prehistory*. Report Number 20. United States Forest Service.

MIG, Inc. I TRA Environmental Sciences. 2016 (January). Brimstone and Sugar Pine OHV Staging Areas Development Project on the Tahoe National Forest CEQA Mitigated Negative Declaration and Supplement to NEPA Environmental Assessment. Prepared for State of California, Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division.

MIG, Inc. 2021. CEQA Documentation: Use of a Finding of No Significant Impact (FONSI) in lieu of a Negative Declaration for the Tahoe National Forest, Robinson Flat to China Wall Connector Trail Project. Prepared for State of California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation (OHMVR) Division.

[NOAA] National Oceanic and Atmospheric Administration (NOAA), National Ocean Service. 2025. What is subsidence? Accessed January 2, 2025 at: https://oceanservice.noaa.gov/facts/subsidence.html.

[NOAA Fisheries] National Oceanic and Atmospheric Administration's National Marine Fisheries Service. 2024a. Endangered Species Act (ESA) Critical Habitat Mapper. Accessed December 2024 at: https://www.fisheries.noaa.gov/resource/map/national-esa-critical-habitat-mapper.

[NOAA Fisheries] National Oceanic and Atmospheric Administration's National Marine Fisheries Service. 2024b. Essential Fish Habitat. Accessed December 2024 at: https://www.fisheries.noaa.gov/resource/map/essential-fish-habitat-mapper.

[NWI] National Wetlands Inventory. 2024. Wetlands Mapper. U.S. Fish and Wildlife Service Accessed December 2024 at https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/.

National Wildlife Federation. 2024. Monarch Butterfly. Accessed December 2024 at: https://www.nwf.org/Educational-Resources/Wildlife-Guide/Invertebrates/Monarch-Butterfly#:~:text=As%20adults%2C%20monarchs%20feed%20on,for%20the%20egg%20to%20hatch.

[NRCS] Natural Resources Conservation Service. 2025. Web Soil Survey. Accessed January 3, 2025 at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

Nisenan. 2025. "The Ancestral Homelands of the Nisenan." Accessed April 2025. https://www.nisenan.org/.

Patel, A. 2019. Geotechnical Investigations and Improvements in Ground Conditions. A volume in Woodhead Publishing Series in Civil and Structural Engineering. ISBN 978-0-12-817048-9.

Placer County. 2022. Placer County Primary Watersheds. Accessed January 9, 2025 at: https://placerrcd.org/wp-content/uploads/2022/04/RE_Water-and-Watershed-Resources.pdf.

[Placer County APCD] Placer County Air Pollution Control District. 2017. CEQA Handbook. Accessed September 10, 2024 at https://www.placerair.org/1801/CEQA-Handbook.

[Placer County APCD] Placer County Air Pollution Control District. 2021. Placer County Air Pollution Control District Policy Review of Land Use Projects Under CEQA. https://placerair.org/DocumentCenter/View/55349/Final-CEQA-Review-Policy-Amendment_8-12-2021?bidId=.

[Placer County APCD] Placer County Air Pollution Control District. 2024. Rules. Accessed September 10, 2024 at https://www.placer.ca.gov/1861/Rules.

Rowe, Courtney. 2018a. Biological Assessment and Biological Evaluation of Botanical Species, Big Sugar Project, American River Ranger District, Tahoe National Forest. December 2018.

Rowe, Courtney. 2018b. Other Botanical Resources Assessment, Big Sugar OHV Project, American River Ranger District, Tahoe National Forest. December 2018.

[SMAQMD] Sacramento Metropolitan Air Quality Management District. 2017 (July 24). Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan. http://www.airquality.org/ProgramCoordination/Documents/Sac%20Regional%202008%20NAAQS%20Attainment%20and%20RFP%20Plan.pdf.

[SWRCB] State Water Resources Control Board. 2024. Geotracker. Accessed September 23, 2024 at: https://geotracker.waterboards.ca.gov/.

[SWRCB] State Water Resources Control Board. 2025. California Sustainable Groundwater Management Act Unmanaged Areas. Accessed January 8, 2025 at: https://gispublic.waterboards.ca.gov/portal/home/webmap/viewer.html?webmap=33be434cc60740d095f296c5d2432897.

Teater, Dan. 2018 (December). Tahoe National Forest American River Ranger District Biological Assessment of Aquatic Species for the Big Sugar Project. Project Location: Placer County, California. Reviewed by Tina Mark, Forest Biologist.

The American River. 2024. American River Watershed. Accessed January 8, 2025 at: https://www.theamericanriver.com/watershed/.

The Diggings.2024. Mining Claims in Tahoe National Forest. Accessed September 20, 2024 at https://thediggings.com/lands/usfs-0073.

Turrentine, W., Jackson Rand Herbert, and Stephen Wee. 1982. *History of Tahoe National Forest: 1840-1940, A Cultural Resources Overview History*. Jackson Research Projects, United States Forest Service.

[USFS] United States Forest Service. 2023. ArcGIS REST Services Directory: Wildfire Hazard Potential - Version 2023 – Classified. Accessed October 1, 2024 at https://apps.fs.usda.gov/arcx/rest/services/RDW_Wildfire/RMRS_WildfireHazardPotential_2023/MapServer.

[USFS] U.S. Department of Agriculture Forest Service, Region 5. 1990. Land and Resource Management Plan for the Tahoe National Forest.

United States Department of the Interior. Bureau of Land Management. 2025. About Mining and Minerals. Accessed March 27, 2025 at https://www.blm.gov/programs/energy-and-minerals/mining-and-minerals/about.

[USFS] U.S. Department of Agriculture Forest Service, Pacific Southwest Region. 2004 (January 21). Sierra Nevada Forest Plan Amendment Final Supplemental Environmental Impact Statement Record of Decision.

[USFS] U.S. Department of Agriculture Forest Service, Pacific Southwest Region. 2007. Sierra Nevada Forests Management Indicator Species Amendment Record of Decision.

[USFS] U.S. Department of Agriculture Forest Service, Pacific Southwest Region, Tahoe National Forest. 2012. Wildlife Tahoe National Forest. Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5350564.pdf

[USFS] U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. 2013 (January). Environmental Assessment: OHV Staging Area Construction and Expansions Project, American River Ranger District, Tahoe National Forest, Placer County, California.

[USFS] U.S. Department of Agriculture, Forest Service. 2019 (June). Big Sugar Project Environmental Assessment, American River Ranger District, Tahoe National Forest, Placer County, California.

[USFS] U.S. Department of Agriculture Forest Service, Tahoe National Forest. 2024a (June 3). China Wall SA Expansion (FINAL). Application for the California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division (OHMVR Division) Grants and Cooperative Agreements Program.

[USFS] U.S. Department of Agriculture Forest Service, Tahoe National Forest. 2024b (June 3). Loops 5 and 6 Reroutes (FINAL). Application for the California Department of Parks and Recreation Off-Highway Motor Vehicle Recreation Division (OHMVR Division) Grants and Cooperative Agreements Program.

[USFS] U.S. Department of Agriculture, Forest Service, Tahoe National Forest. 2024c. Habitat Management Program (HMP) for Off-Highway Motor Vehicle Recreation Division Department of Parks and Recreation, Grants and Cooperative Agreements Program.

[USFS] U.S. Department of Agriculture Forest Service, Tahoe National Forest. 2024d. A Healthy Forest Can Help Prevent Wildfire. Accessed December 4, 2024 at: https://www.fs.usda.gov/detailfull/tahoe/home/?cid=FSEPRD591055.

[USFS] U.S. Department of Agriculture, Forest Service, Tahoe National Forest. 2025. Fire Management. Accessed January 10, 2025 at: https://www.fs.usda.gov/main/tahoe/fire.

[USDA and SHPO] U.S. Department of Agriculture (USDA) Forest Service et. al. 2018. Programmatic Agreement Among the U.S.D.A. Forest Service, Pacific Southwest Region (Region 5), California State Historic Preservation Officer, Nevada State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Processes for Compliance with Section 106 of the National Historic Preservation Act for Management of Historic Properties by the National Forests of the Pacific Southwest Region. Executed February 6, 2013. As amended 2018.

U.S. Department of the Interior. 2025. Bureau of Land Management. About Mining and Minerals. Accessed March 20, 2025 at https://www.blm.gov/programs/energy-and-minerals/mining-and-minerals/about.

[USFWS] U.S. Fish and Wildlife Service. 2024a. Information for Planning and Conservation (IPaC). Accessed December 2024 at: https://ecos.fws.gov/ipac/.

[USFWS] U.S. Fish and Wildlife Service. 2024b. Environmental Conservation Online System (ECOS) USFWS Threatened & Endangered Species Active Critical Habitat Report: online mapper. Accessed December 2024 at: https://ecos.fws.gov/ecp/report/table/critical-habitat.html.

U.S. Geological Survey (USGS). 2025. USGS Store Map Locator. Accessed January 15, 2025 at https://store.usgs.gov/map-locator.

[UC ANR] University of California Agriculture and Natural Resources. 2025. California Fish Website, Fish Species: Fish Species by Watersheds: 'Humbug Creek 180102060801.' Accessed May 2025 at: https://calfish.ucdavis.edu/location/?ds=698&reportnumber=1293&catcol=4712&categorysearch=%27Humbug%20Creek%2D180102060801%27

Walters, S. 2023. Why Are Fossils Only Found in Sedimentary Rocks? Discover Magazine, March 28, 2023. Accessed January 3, 2025 at https://www.discovermagazine.com/the-sciences/why-are-fossils-only-found-in-sedimentary-rocks.

Wilson, Norman L. and Arlean H. Towne. 1978. "Nisenan." In *Handbook of North American Indians Volume 8: California*, edited by Robert F. Heizer. Smithsonian Institution, Washington.

Xerces Society, Wildlife Preservation Canada, and York University Environmental Studies. 2024. Bumblebee Watch. Accessed December 2024 at: https://www.bumblebeewatch.org/.

4.2 REPORT PREPARATION

MIG, Inc.

2055 Junction Avenue, Suite 205
San Jose, CA 95131
(650) 327-0429
www.migcom.com

Environmental Analysis and Document Preparation

Paula Hartman – Program Manager
Megan Kalyankar – Senior Biologist/ Environmental Analyst
Rose Redlich – CEQA Analyst
Sang Bae – Cultural Resources Project Associate
Kasey Kitowski – Air Quality / Noise Analyst

CDPR

Scott Soares
California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
PO Box 942896
Sacramento, CA 94296-0001

Appendix A. Special-Status Species Tables

China Wall Staging Area Expansion / Loops 5 and 6 Reroutes

Table A-1. Special-status Plant Species with the Potential to Occur in the Project Area

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Fungi					
Large cudonia *Cudonia monticola*	USFS-S, TNF WL	Endemic to northwestern North America; in California it is known to occur on the Coast Range, in the Klamath Mountains, and northern Sierra Nevada.	It is generally found in mature, moist coniferous forests and has no adaptations to desiccation from loss of humidity within its micro-climate.	mushroom	**Not Expected.** The OHV SA and Expansions EA said that direct effects on this species are not expected in the project area, as it is not known to occur there and was not detected during surveys. The Big Sugar Project EA said the project will not affect this species.
Branched collybia *Dendrocollybia racemosa*	USFS-S	Widespread in the Northern Hemisphere but always rare locally. On the TNF, it is known to occur on the Yuba River Ranger District in the Skillman Campground and Bullards Bar areas.	It grows in conifer forests on rotting or mummified remains of other mushrooms and sometimes in the leaf litter..	mushroom	**Not Expected.** The OHV SA and Expansions EA said that direct effects on this species are not expected in the project area, as it is not known to occur there and was not detected during surveys. The Big Sugar Project EA said the project will not affect this species.
Olive phaeocollybia *Phaeocollybia olivacea*	USFS-S	Endemic to the western United States from the central Oregon coast south to Santa Cruz County. On the TNF, it is known from the Yuba River Ranger District in the Hornswoggle Campground area near Bullard's Bar Reservoir and along the Schoolhouse Trail near Schoolhouse Campground.	Fall-fruiting mushroom known to grow in conifer and oak forests	mushroom	**Not Expected.** The OHV SA and Expansions EA said that direct effects on this species are not expected in the project area, as it is not known to occur there and was not detected during surveys. The Big Sugar Project EA said the project will not affect this species.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
NON-VASCULAR SPECIES					
Scalloped moonwort *Botrychium crenulatum*	USFS-S, TNF WL, CRPR 2B.2	Found in Arizona, California, Idaho, Montana, Nevada, Oregon, Utah, Washington, and Wyoming.	Bogs and fens, lower montane coniferous forest, meadows and seeps, marshes and swamps (freshwater), and upper montane coniferous forest. 1268 - 3280 m.	perennial rhizomatous herb, June-September	**Not Expected.** There are no CNDDB or TNF records in the project area. Some suitable habitat is found at creek crossings, but this species was not found in surveys of the project sites.
Mingan moonwort *Botrychium minganense*	USFS-S, TNF WL, CRPR 2B.2	Found in Alaska, Arizona, California, Colorado, Idaho, Maine, Michigan, Minnesota, Montana, Nevada, New Hampshire, North Dakota, Oregon, South Dakota, Utah, Washington, Wisconsin, and Wyoming.	Lower montane coniferous forest, upper montane coniferous forest, bogs and fens, meadows and seeps. Creekbanks in mixed conifer forest. 1190-3295 m.	perennial rhizomatous herb; July-September	**Not Expected.** There are no CNDDB or TNF records in the project area. Some suitable habitat is found at creek crossings, but this species was not found in surveys of the project sites.
Elongate copper moss *Mielichhoferia elongata*	USFS-S, TNF WL, CRPR 4.3	Found in Alaska, California, Colorado, Maine, Michigan, Montana, New York, Oregon, and Tennessee.	Cismontane woodland. Moss growing on very acidic, metamorphic rock or substrate; usually in higher portions in fens. Often on substrates naturally enriched with heavy metals (e.g., copper) such as mine tailings. 5-1085 m.	moss; unknown	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites. The sites are outside of the usual elevational range for this species.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Western waterfan lichen *Peltigera gowardii*	USFS-S, CRPR 4.2	Found in California, Georgia, Maine, Massachusetts, Montana, New Hampshire, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Tennessee, Vermont, Virginia, and Washington.	Riparian forest. On rocks in cold water creeks with little or no sediment or disturbance. Often associated with rich bryophyte flora. 1065-2375 m.	foliose lichen (aquatic); unknown	**Not Expected.** According to the CNDDB Rare Plant Inventory, this species has been found in the Westville Quad, but there are no CNDDB or TNF records of it in the project area. Suitable habitat is limited or absent in the project area.
ANGIOSPERM: MONOCOTS					
Sanborn onion *Allium sanbornii* var. *sanbornii*	TNF WL, CRPR 4.2	Found in California and Oregon.	Chaparral, cismontane woodland, and lower montane coniferous forest on gravelly, serpentine (usually) soils. 260 - 1510 m.	perennial bulbiferous herb, May-September	**May be Present.** According to the Other Botanical Resources Report prepared for the Big Sugar Project EA, this species occurs near Loop 6. Calflora records of this species in the project area from 1994 to 2011 exist. There is suitable habitat in some parts of the project area.
Pleasant Valley mariposa lily *Calochortus clavatus* var. *avius*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in Amador, Calaveras, El Dorado, and Placer counties.	Lower montane coniferous forest (Josephine silt loam, volcanic). 305 - 1800 m.	perennial bulbiferous herb, May-July	**May be Present.** There are no CNDDB or TNF records in the project area. There is suitable habitat in the China Wall SA project area according to the OHV SA and Expansions EA.
Sierra aching sedge *Carex cyrtostachya*	CRPR 1B.2	California endemic found in Butte, El Dorado, and Yuba counties.	Lower montane coniferous forest (mesic), meadows and seeps, marshes and swamps, and riparian forest (margins). 610 - 1360 m.	perennial herb, May-August	**Absent.** There are no CNDDB or TNF records in the project area, and this species is unknown from Placer County. The sites are outside of the usual elevational range for this species.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Woolly-fruited sedge *Carex lasiocarpa*	TNF WL, CRPR 2B.3	Found in California, Idaho, Oregon, and Washington.	Bogs and fens, marshes and swamps. Sphagnum bogs, freshwater marsh, lake margins. 600-1965 m.	perennial rhizomatous herb; Jun-Jul	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites.
Mud sedge *Carex limosa*	TNF WL, CRPR 2B.2	Found in Alaska, California, Colorado, Connecticut, Idaho, Illinois, Indiana, Iowa, Maine, Massachusetts, Michigan, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Ohio, Oregon, Pennsylvania, Utah, Vermont, Washington, Wisconsin, and Wyoming.	Bogs and fens, lower montane coniferous forest, meadows and seeps, marshes and swamps, upper montane coniferous forest. In floating bogs and soggy meadows and edges of lakes. 1370-2790 m.	perennial rhizomatous herb; Jun-Aug	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites.
Sheldon's sedge *Carex sheldonii*	TNF WL, CRPR 2B.2	Found in California, Idaho, Nevada, Oregon, Utah, and Washington.	Lower montane coniferous forest (mesic), marshes and swamps (freshwater), and riparian scrub. 1200 - 2012 m.	perennial rhizomatous herb, May-August	**Not Expected.** There are no CNDDB or TNF records in the project area. Suitable habitat is very limited or absent in the project area.
Red Hills soaproot *Chlorogalum grandiflorum*	TNF WL, CRPR 1B.2	California endemic found in Amador, Calaveras, El Dorado, Placer, and Tuolumne counties.	Chaparral, cismontane woodland, and lower montane coniferous forest. 245 - 1690 m.	perennial bulbiferous herb, May-June	**Not Expected.** Calflora records for this species exist in the Michigan Bluff Quad, where Loop 6 is, but suitable habitat is very limited or absent in the project area.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Butte County fritillary *Fritillaria eastwoodiae*	USFS-S, TNF WL, CRPR 3.2	Found in California and Oregon. In California, found in Butte, El Dorado, Nevada, Placer, Shasta, Tehama, and Yuba counties.	Chaparral, cismontane woodland, lower montane coniferous forest. Usually on dry slopes but also found in wet places; soils can be serpentine, red clay, or sandy. 1475-4550 m.	perennial bulbiferous herb; March-June	**May be Present.** There are no CNDDB or TNF records in the project area, but according to the OHV SA and Expansions EA, there is suitable habitat in the China Wall SA project area.
Coleman's rein orchid *Piperia colemanii*	TNF WL, CRPR 4.3	California endemic found in Amador, Butte, Calaveras, El Dorado, Fresno, Lassen, Madera, Mariposa, Placer, Plumas, San Diego, Shasta, Sierra, Siskiyou, Tehama, and Tuolumne counties.	Chaparral, and lower montane coniferous forest, often in sandy soils. 1200 - 2300 m.	perennial herb, June-August	**Not Expected.** According to the CNPS Rare Plant Inventory, this species is known from the Michigan Bluff Quad, but there are no CNDDB or TNF records of it in the project area. Sandy soils are not common in the project area.
Sierra blue grass *Poa sierrae*	USFS-S, CRPR 1B.3	California endemic found in Butte, El Dorado, Nevada, Placer, Plumas, Shasta, and Sierra counties.	Lower montane coniferous forest. Shady, moist, rocky slopes. Often in canyons. 365-1915 m.	perennial rhizomatous herb; Apr-July	**May be Present.** There are CNDDB records of this species in the project area from 2018 in the El Dorado and Humbug Creek canyons. There is suitable habitat for this species in some parts of the project area.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
White beaked rush *Rhynchospora alba*	TNF WL, CRPR 2B.2	Found in Alabama, Alaska, California, Connecticut, Delaware, District of Columbia, Georgia, Idaho, Illinois, Indiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Washington, West Virginia, and Wisconsin.	Bogs and fens, meadows and seeps, and marshes and swamps (freshwater). 60 - 2040 m.	perennial rhizomatous herb, June-August	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites.
Brownish beaked-rush *Rhynchospora capitellata*	TNF WL, CRPR 2B.2	Found in Alabama, Arkansas, California, Connecticut, Delaware, District of Columbia, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Texas, Vermont, Virginia, West Virginia, and Wisconsin	Lower montane coniferous forest, meadows and seeps, marshes and swamps, and upper montane coniferous forest on mesic sites. 45 - 2000 m.	perennial herb, July-August	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Water bulrush *Schoenoplectus subterminalis*	TNF WL, CRPR 2B.3	Found in Alaska, California, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Utah, Vermont, Virginia, Washington, Wisconsin, and Wyoming.	Bogs and fens, and marshes and swamps (montane lake margins). 750 - 2250 m.	perennial rhizomatous herb (aquatic), June-August	**Absent.** There are no CNDDB or TNF records in the project area and no suitable habitat in or near the project sites.
ANGIOSPERMS: DICOTS					
True's manzanita *Arctostaphylos mewukka* ssp. *truei*	TNF WL, CRPR 4.2	California endemic found in Butte, El Dorado, Nevada, Placer, Plumas, and Yuba counties.	Chaparral, and lower montane coniferous forest, sometimes on roadsides. 425 - 1390 m.	perennial evergreen shrub, February-July	**Not Expected.** According to the CNPS Rare Plant Inventory, this species is known from the USGS Quads where the project sites are located (Westville and Michigan Bluff). However, the only record in the project area was a misidentification.
Nissenen manzanita *Arctostaphylos nissenana*	TNF WL, USFS-S, CRPR 1B.2	California endemic found in El Dorado, and Tuolumne counties.	Closed-cone coniferous forest, and chaparral. 450 - 1100 m.	perennial evergreen shrub, February-March	**Not Expected.** There is a Calflora record for this species from the Michigan Bluff Quad (where most of Loop 6 is). This species occurs infrequently in small populations, and the sites are outside of its usual elevational range.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Webber's milkvetch *Astragalus webberi*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in Plumas County.	Broadleafed upland forest, lower montane coniferous forest, meadows and seep. 731 - 1250 m.	perennial herb, May-July	**Absent.** The OHV SA and Expansions EA says that the project may affect this species, but there is no suitable habitat in or near China Wall SA, which is above its usual elevation range. This species has not been found in Placer County.
Watershield *Brasenia schreberi*	CRPR 2B.3	Found in Alabama, Alaska, Arkansas, California, Connecticut, Delaware, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, Wisconsin.	Marshes and swamps (freshwater). 0 - 2200 m.	perennial rhizomatous herb (aquatic), June-September	**Absent.** No CNDDB or TNF records exist in the project area, and this species is not known from Placer County. There is no suitable habitat for this species in the project area.
Van Zuuk's morning glory *Calystegia vanzuukiae*	TNF WL, CRPR 1B.3	California endemic found in El Dorado, and Placer counties.	Chaparral, and cismontane woodland. 500 - 1180 m.	perennial rhizomatous herb, May-August	**Absent.** There are no CNDDB or TNF records in the project area. There is no suitable habitat in the project area, and the project sites are outside this species' usual elevational range.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Dissected leaf toothwort *Cardamine pachystigma* var. *dissectifolia*	TNF WL, CRPR 1B.2	California endemic found in Butte County.	Chaparral, and lower montane coniferous forest in rocky, usually serpentine soils. 255 - 2100 m.	perennial rhizomatous herb, February-May	**Not Expected.** There is a Calflora record for this species in the Michigan Bluff Quad where Loop 6 is, but there is no suitable habitat in the project area.
Brandegee's clarkia *Clarkia biloba* ssp. *brandegeeae*	TNF WL, CRPR 1B.3	California endemic found in Amador, Butte, El Dorado, Nevada, Placer, Sacramento, Sierra, and Yuba counties.	Chaparral, cismontane woodland, and lower montane coniferous forest. 75 - 915 m.	annual herb, May-July	**Not Expected.** Calflora records for this species exist in the Michigan Bluff Quad, where Loop 6 is, but the project sites are outside of the species' usual elevational range.
Starved daisy *Erigeron miser*	USFS-S, TNF WL, CRPR 1B.3	Sierra Nevada Mts in California and Nevada, upper elevations southwest and northwest of Lake Tahoe.	Upper montane coniferous forest. Rocky, granitic outcrops. 1550-2775 m.	perennial herb; Jun-October	**Not Expected.** There are no CNDDB or TNF records in the project area though there is a 2022 Calflora occurrence in the Westville Quad. The OHV SA and Expansions EA says there is no suitable habitat at the project sites the project will not have an impact this species The Big Sugar Project EA says that other parts of that project may affect this species, but it is not known from Loops 5 and 6 reroutes project area.
Sierra starwort *Hartmaniella sierrae*	CRPR 4.2[1]	California endemic found in Calaveras, El Dorado, Mariposa, Nevada, Placer, Plumas, Sierra, and Tuolumne counties.	Chaparral, cismontane woodland, lower montane coniferous forest, and upper montane coniferous forest. 1225 - 2194 m.	perennial rhizomatous herb, May-August	**May be Present.** According to the CNPS Rare Plant Inventory, this species has been found in the Westville Quad. There is suitable habitat in some parts of the project area.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Parry's horkelia *Horkelia parryi*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in Amador, Calaveras, El Dorado, Mariposa, and Tuolumne counties.	Chaparral, and cismontane woodland Ione formation and other soils. 80 - 1070 m.	perennial herb, April-July	**Absent.** There are no CNDDB or TNF records in the project area. There is no suitable habitat in the project area and the project sites are outside of the usual elevational range for this species.
Cantelow's lewisia *Lewisia cantelovii*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in Butte, Nevada, Plumas, Shasta, Sierra, and Yuba counties.	Broadleaved upland forest, lower montane coniferous forest, cismontane woodland, chaparral. Mesic rock outcrops and wet cliffs, usually in moss or clubmoss; on granitics, or sometimes on serpentine. 325-1375 m.	perennial herb; May-October	**Absent.** There are no CNDDB or TNF records in the project area and this species is not known from Placer County. The sites are outside of the usual elevational range for this species.
Hutchinson's lewisia *Lewisia kelloggii* ssp*. hutchisonii*	USFS-S, TNF WL, CRPR 3.2	California endemic found in Butte, Calaveras, Nevada, Plumas, Sierra, Trinity, and Tuolumne counties. May be extirpated from Alpine, Amador, El Dorado, Humboldt, Placer, Shasta, and Siskiyou counties.	Upper montane coniferous forest. On slate, in openings and on ridgetops. Sometimes on rhyolite tuff. 765-2365 m.	perennial herb; (Apr)May-Aug	**Not Expected.** There are no CNDDB or TNF records in the project area and this species may be extirpated from Placer County. The OHV SA and Expansions EA says the project will not have an impact this species, and it was not found in 2012 surveys of China Wall SA. The Big Sugar Project EA says that other parts of that project may affect this species, but it is not known from Loops 5 and 6 reroutes project area.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Saw-toothed lewisia *Lewisia serrata*	USFS-S, TNF WL, CRPR 1B.1	Western Sierra Nevada Mountains of California in El Dorado and Placer Counties	Broad-leafed upland forest, lower montane coniferous forest, riparian forest. Shaded, north-facing, moss-covered, metamorphic rock cliffs. 800-1435 m.	perennial herb; May-Jun	**Not Expected.** There are two CNDDB records of this species in the same USGS Quad as Loop 6. However, there is no suitable habitat in or near the project sites, and the sites are outside of the usual elevational range for this species.
Quincy lupine *Lupinus dalesiae*	TNF WL, CRPR 4.2	California endemic found in Plumas, Sierra, and Yuba counties.	Chaparral, cismontane woodland, lower montane coniferous forest, and upper montane coniferous forest in openings and often in disturbed areas. 855 - 2500 m.	perennial herb, May-August	**Not Expected.** The OHV SA and Expansions EA says that there is suitable habitat for this species in the project area, but it wasn't found in the 2012 surveys of the area. This species is not known from Placer County.
Follet's monardella *Monardella follettii*	USFS-S, TNF WL, CRPR 1B.2	Endemic to Plumas County.	Lower montane coniferous forest (rocky, serpentinite). 600 - 2000 m.	perennial shrub, June-September	**Not Expected.** The OHV SA and Expansions EA says other staging areas covered in this EA may affect this species, but it has not been found in Placer County and there is no suitable habitat in or near China Wall SA.
Layne's ragwort *Packera layneae*	FT, SR, CRPR 1B.2	Western Sierra Nevada Mountains of California in El Dorado, Placer, Tuolumne, and Yuba Counties	Chaparral, cismontane woodland. Ultramafic soil (serpentine or gabbro); occasionally along streams. 205-1060 m	perennial herb; Apr-Aug	**Not Expected.** Two CNDDB records of this species are within 5 miles of Loops 5 and 6 at Forbes Creek and Sage Hill, respectively. However, there is no suitable habitat in or near the project sites and the sites are outside of the usual elevational range for this species.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
Closed-throated beardtongue *Penstemon personatus*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in Butte, Nevada, and Plumas, Sierra counties.	Lower montane coniferous forest, upper montane coniferous forest, chaparral. Usually on north-facing slopes in metavolcanic soils. 1340-2125 m.	perennial herb; June-September (October)	**Not Expected.** No CNDDB or TNF records exist in the project area, and this species is not known from Placer County. The OHV SA and Expansions EA says there is suitable habitat near the China Wall SA, though it was not found in 2012 surveys of the site. The Big Sugar Project EA did not mention this species.
Stebbins' phacelia *Phacelia stebbinsii*	USFS-S, TNF WL, CRPR 1B.2	California endemic found in El Dorado, Nevada, and Placer counties.	Lower montane coniferous forest, cismontane woodland, meadows and seeps. Among rocks and rubble on metamorphic rock benches. 610-2010 m.	annual herb; May-July	**May be Present.** This species is known from the Westville and Michigan Bluff Quads according to the CNPS Rare Plant Inventory. There is suitable habitat in the project area according to the OHV SA and Expansions EA, though it was not found in 2012 surveys of the site.
Alder buckthorn *Rhamnus alnifolia*	TNF WL, CRPR 2B.2	Found in California, Idaho, Oregon, Utah, Washington, and Wyoming.	Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest, riparian scrub. Mesic sites. 1460-2135 m.	perennial deciduous shrub; May-July	**Not Expected.** There are no CNDDB or TNF records in the project area. Suitable mesic habitat is limited or absent in the project area.
Long-fruit jewelflower *Streptanthus longisiliquus*	CRPR 4.3[1]	California endemic found in Butte, El Dorado, Nevada, Placer, Shasta, and Tehama counties.	Cismontane woodland, and lower montane coniferous forest in openings. 715 - 1500 m.	perennial herb, April-September	**Not Expected.** This species is found in the Michigan Bluff Quad according to the CNPS Rare Plant Inventory. The project sites are mostly above the usual elevation range for this species.

Species	Status	Geographic Distribution[1, 3, 5]	Habitat Requirements	Life Form; Blooming Period	Potential Occurrence in the Project Area
True's mountain jewelflower *Streptanthus tortuosus* ssp. *truei*	CRPR 1B.1	California endemic found in Nevada, and Sierra counties.	Lower montane coniferous forest in partial shade on steep rocky slopes. 765 - 860 m.	perennial herb, June-July	**Absent.** There are no CNDDB or TNF records in the project area and this species is not known from Placer County. The sites are outside of the usual elevational range for this species.
Felt-leaved violet *Viola tomentosa*	CRPR 4.2[1]	California endemic found in Butte, El Dorado, Nevada, Placer, Plumas, and Sierra counties.	Lower montane coniferous forest, subalpine coniferous forest, and upper montane coniferous forest on gravelly soils. 1435 - 2000 m.	perennial herb, May-October	**May be Present.** There is a CNDDB record of this species near Loop 5 from 1993, and there are Calflora records in that area from 2007, 2012, and 2023. There is suitable habitat in some parts of the project area.

1. CRPR list 3 and 4 species that are not also USFS-S and/or TNF WL species are included in the table for informational purposes only and are not included in the CEQA analysis.

STATUS KEY:

Federal

FT: Federally-listed Threatened
USFS-S: United States Forest Service – Sensitive
TNF WL: Tahoe National Forest Wath List[9]

State

SR: State-listed Rare

California Native Plant Society (CNPS) California Rare Plant Rank (CRPR):

1B: Plants listed as rare, threatened, or endangered in California and elsewhere
2B: Plants rare, threatened, or endangered in California, but more common elsewhere
3: Plants about which we need more information
4: Watch list: plants of limited distribution

CNPS CRPR added a decimal threat rank to the List rank to parallel that used by the CNDDB. This extension replaces the E (Endangerment) value from the R-E-D Code. CRPR ranks therefore read like this: 1B.1, 1B.2, etc. Threat code extensions and their meanings are as follows:

[9] TNF maintains a watch list of botanical species (plants, lichen, and fungi) that of conservation concern, but have not been designated as Forest Service Sensitive (USFS-S) by the Regional Forester. This list includes species that are newly described; locally rare; range extensions or disjunct populations; plants of specific public interest; or species with too little information to determine their appropriate status. These species make an important contribution to forest biodiversity and should be protected under the provisions of the National Forest Management Act (NFMA) (1976). According to the Regional Forester, Watch List species should be considered during project planning with corresponding documentation maintained in the planning file (USDA Forest Service 2006).

.1 – Seriously endangered in California (over 80% of occurrences threatened / high degree of immediacy of threat)
.2 – Fairly endangered in California (20-80% occurrences threatened)
.3 – Not very endangered in California (<20% of occurrences threatened or no current threats known)

SOURCES:

1.United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPAC) Species List (December 2, 2024).

2. California Natural Diversity Database (CNDDB) Rarefind 5 search of Westville and Michigan Bluff USGS Quads and ten surrounding quads (December 2, 2024).

3. California Native Plant Society (CNPS) Rare and Endangered Plant Inventory search of Westville and Michigan Bluff USGS Quads (December 4, 2024).

4. U.S. Department of Agriculture Forest Service. 2019. Big Sugar Project Environmental Assessment, American River Ranger District, Tahoe National Forest, Placer County, CA.

5. Rowe, Courtney. 2018a. Biological Assessment and Biological Evaluation of Botanical Species, Big Sugar Project, American River Ranger District, Tahoe National Forest. December 2018.

6. Rowe, Courtney. 2018b. Other Botanical Resources Assessment, Big Sugar OHV Project, American River Ranger District, Tahoe National Forest. December 2018.

7. U.S. Department of Agriculture Forest Service, Pacific Southwest Region. 2013. Environmental Assessment OHV Staging Area Construction and Expansions Project, American River Ranger District, Tahoe National Forest, Placer County, California.

8. Lyon, Victor. 2012. Biological Evaluation for Plants and Fungi, OHV Staging Area Construction and Reconstruction in the Sugar Pine Area, American River Ranger District, Tahoe National Forest.

9. Calflora. 2024. Search for Plants: CNPS rare plants in Placer County (December 17, 2024).

Table A-2. Special-Status Animal Species with the Potential to Occur in the Project Area

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
Invertebrates				
Western bumblebee *Bombus occidentalis*	SCE,USFS-S	Once common and widespread, this species has declined precipitously from central CA to southern British Columbia, perhaps due to disease.	Western bumble bees use various natural, agricultural, urban, and rural habitat types. They require suitable nesting sites (e.g., burrows), overwintering sites for the queens, and nectar and pollen resources throughout the spring, summer, and fall.	**May be Present.** Per Bumblebee Watch, a western bumblebee was observed about 3.5 miles northwest of China Wall SA in 2024. The project area is within the current range of this species and may include suitable nesting and foraging habitat.
Monarch butterfly *Danaus plexippus*	FC, USFS-S	North America, from southern Canada south to South America and the Caribbean. Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico.	Roosts are located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	**May be Present.** According to the G24 HMP for the project this species occurs in the TNF. Milkweed occurs in disturbed areas near roads and in wet areas but is generally uncommon on the TNF. There is no winter roosting habitat for this species in the TNF.
Button's Sierra sideband *Monadenia mormonum buttoni*	CNDDB	Known from the central Sierra Nevada counties.	Found in chaparral, cismontane woodland, and valley and foothill grassland communities.	**Absent.** There are no nearby CNDDB records or suitable habitat for this species in the project area.
Goldrush hanging scorpionfly *Orobittacus obscurus*	CNDDB	Known only from two localities on the western slopes of the central Sierra Nevada.	Found in heavily shaded and humid settings along the river including tree roots, riverbank cuts, beneath fallen logs, and in boulder and rock overhangs.	**Absent.** There is one CNDDB record of this species about 3.5 miles southwest of China Wall SA from 1976. There is no suitable habitat for this species in the project area.
Spiny rhyacophilan caddisfly *Rhyacophila spinata*	CNDDB	Placer, Plumas, and Sierra counties.	Rhyacophilids generally prefer cool, running water.	**Absent.** There are no nearby CNDDB records or suitable habitat for this species in the project area.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
Graham's Cave amphipod *Stygobromus grahami*	CNDDB	Known only from Central California.	Found only in caves.	**Absent.** There are no nearby CNDDB records or suitable habitat for this species in the project area.
Amphibians				
Southern long-toed salamander *Ambystoma macrodactylum sigillatum*	CSSC	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. Dispersal distance is generally less than 1,000 m.	**Not Expected.** The closest CNDDB record of this species is about 3.5 miles north of Loop 5 from 2002. There is no suitable breeding habitat for this species in the project area and the project sites are beyond the dispersal distance of CNDDB records.
Foothill yellow-legged frog- north Sierra DPS *Rana boylii* pop. 3	ST, USFS-S	Yuba River to Middle Fork American River, and Sutter Buttes. Subbasins (HU 8) Butte Creek, Honcut Headwaters - Lower Feather, Upper Yuba, Upper Bear, Upper Coon - Upper Auburn, North Fork American, and Lower American in Sutter, Yuba, Sierra, Nevada, and Placer counties.	Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	**May be Present.** This species is known to occur in the project area based on CNDDB and TNF records, although it is highly aquatic and thus would only occur at stream crossings along the trail reroutes.
Foothill yellow-legged frog- south Sierra DPS *Rana boylii* pop. 5	FE, SE, USFS-S	Sierra Nevada from South Fork American River subbasin (HU 8) in El Dorado County south to Tehachapi Mountains in Kern County.	Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Needs at least some cobble-sized substrate for egg-laying and at least 15 weeks to attain metamorphosis.	**Absent.** There are no records of this species in the project area, and the area is outside the usual range for this population.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
California red-legged frog *Rana draytonii*	FT, CSSC	Known from 35 counties in California in the Coast Range from southern Mendocino County to Santa Barbara County, through the northern Transverse Ranges from Santa Barbara County to Los Angeles County, and in isolated populations in the Sierra Nevada foothills, Riverside County, and San Diego County.	Lowlands and foothills in or near permanent deep water sources with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to an estivation habitat.	**May be Present.** Based on CNDDB and TNF records, this species is known to occur in the project area. According to the Big Sugar Project EA, suitable habitat exists in the North and Middle Forks of the American River, Eldorado Creek, and Humbug Creek within the project area; this species also uses upland habitat and can disperse up to 2 miles.
Sierra Nevada yellow-legged frog *Rana sierrae*	FE, ST, USFS-S	Diamond Mountains northeast of the Sierra Nevada in Plumas County, south through the Sierra Nevada to Matlock Lake just east of Kearsarge Pass, Inyo County.	Always encountered within a few feet of water. Tadpoles may require 2 to 4 years to complete their aquatic development.	**Not Expected.** There are no CNDDB records of this species in the project area. According to the OHV SA and Expansions EA, China Wall SA is outside of this species' range, and according to the Big Sugar Project EA, which includes the trail reroutes, there is no suitable habitat for this species in the project area.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
REPTILES				
Northwestern pond turtle *Actinemys marmorata*	FPT, USFS-S, CSSC	Found throughout California west of the Cascade-Sierra from near sea level to 4,700 feet.	Permanent ponds, lakes, streams, irrigation ditches, or permanent pools along intermittent streams.	**May be Present.** There are no CNDDB records of this species in the project area, although they are known from the TNF. According to the OHV SA and Expansions EA there is no suitable habitat within 0.25 mile (the dispersal distance for this species) of China Wall SA. According to the Big Sugar Project EA, which includes the trail reroutes, this species hasn't been detected in the project area. However, there is suitable habitat for this species in the project area in Humbug and Eldorado Creeks.
Coast horned lizard *Phrynosoma blainvillii*	CSSC	Found in California along the Pacific coast from the Baja California border west of the deserts and the Sierra Nevada, north to the Bay Area, and inland as far north as Shasta Reservoir.	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and an abundant supply of ants and other insects.	**Absent.** There are no records of this species in the project area, and the area is outside of the usual range for this species.
BIRDS				
American goshawk *Accipiter atricapillus*	CSSC, USFS-S	Inhabits forested areas all around the northern hemisphere, including both North America and Eurasia.	Within and in the vicinity of coniferous forest. Uses old nests and maintains alternate sites—usually nests on north slopes, near water. Red fir, lodgepole pine, Jeffrey pine, and aspens are typical nest trees.	**May be Present.** According to CNDDB and TNF records, this species is known from the project area. According to the OHV SA and Expansions EA, there is no suitable breeding habitat within 0.25 miles of China Wall SA, but foraging habitat is present.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
Greater sandhill crane *Antigone canadensis tabida*	ST, USFS-S	The breeding range covers most of the continental U.S. and Canada and extends into Cuba and Eastern Siberia.	Breeds in wet meadow, shallow lacustrine, and fresh emergent wetland habitats.	**Absent.** There are no CNDDB or TNF records or suitable habitat for this species in the project area.
Black swift *Cypseloides niger*	CSSC	Southeast Alaska to Costa Rica and West Indies	Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea bluffs above the surf; forages widely.	**Not Expected.** There is one CNDDB record of this species from 2003 about 2 miles south of Loop 6. There is no suitable nesting habitat for this species in the project area.
Willow flycatcher *Empidonax traillii*	SE, USFS-S	The breeding range extends through much of North America.	Willow or other riparian shrub habitats are associated with large, wet meadows.	**Absent.** There are no CNDDB or TNF records or suitable habitat for this species in the project area.
Bald eagle *Haliaeetus leucocephalis*	SE, CFP, USFS-S	Year-round resident in northern California, winters throughout the rest of the state.	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests are within 1 mile of water. Nests in large, old-growth, or dominant live trees with open branches, primarily ponderosa pine. Roosts communally in winter.	**Not Expected.** There are no CNDDB or TNF records of this species in the project area. The project sites are about 4 and 6 miles from the Big and Sugar Pine Reservoirs, respectively; these are the closest suitable nesting habitats for this species, which usually nests within 2 miles of a water body.
California spotted owl *Strix occidentalis occidentalis*	FPT, CSSC	Southern Cascade Range of northern California south along the west slope of the Sierra Nevada and the mountains of central and Southern California, nearly to the Mexican border, with an additional three sight records from the Sierra San Pedro Mártir of northern Baja California	Typically found in old-growth forests or mixed stands of old-growth and mature trees. Occasionally found in younger forests with patches of big trees, but generally requires high, multistory canopy dominated by big trees, many trees with cavities or broken tops, woody debris, and space under the canopy.	**May be Present.** According to OHV SA and Expansions EA, there is no suitable breeding habitat within 0.25 miles of China Wall SA, but there is a spotted owl activity center within 0.9 miles of the site. A map for the G24 HMP shows two spotted owl activity centers along Loop 6 and one within a mile of Loop 5.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
Great gray owl *Strix nebulosa*	SE, USFS-S	Dense northern boreal forests across North America and Eurasia. The southernmost edge of their range dips down through the Cascades and Klamath Mountains of the Pacific Northwest, into the Sierra Nevada of California.	Typically known to nest in large broken-top snags within coniferous forest in association with large meadows (usually > 20 acres).	**Not Expected.** There are no CNDDB or TNF records or suitable habitat for this species in the project area. No large meadows are in the project area, and open area habitats in burned areas near Loop 6 are marginal. No great gray owls have been documented in the American River Ranger District of the TNF.
MAMMALS				
Pallid bat *Antrozous pallidus*	CSSC	Occurs across much of western North America from the Okanagan Valley of south-central British Columbia to central Mexico.	This species uses a variety of habitats, most common in open, dry habitats that contain rocky areas for roosting. Roosts in shallow caves, crevices, mines, and occasionally in hollow tree cavities of large snags and buildings.	**May be Present.** There are no CNDDB records of this species in the project area, but it is known from the TNF. According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA).
Sierra Nevada mountain beaver *Aplodontia rufa californica*	CSSC	Dense growth of small deciduous trees and shrubs, wet soil, and abundance of forbs in the Sierra Nevada and the east slope.	This species needs dense understory for food and cover, soft soil for burrowing, and an abundant water supply.	**May be Present.** There are CNDDB records of this species in the project area from El Dorado Canyon in 2009. Suitable habitat may be present along the trail reroutes at creek crossings.
Townsend's big-eared bat *Corynorhinus townsendii*	CSSC, USFS-S	Found throughout western North America, from southern British Columbia to central Mexico.	This species is found in a wide variety of habitats in California. It roosts in the open, hanging from walls and ceilings of caves, mines and buildings, and its roosting sites are limited. It is extremely sensitive to human disturbance and is most common in mesic sites.	**May be Present.** There are no CNDDB records of this species in the project area, but it is known from the TNF. According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA).

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
North American porcupine *Erethizon dorsatum*	CNDDB	Forested habitats in the Sierra Nevada, Cascade, and Coast ranges, with scattered observations from forested areas in the Transverse Ranges.	A wide variety of coniferous and mixed woodland habitats.	**May be Present.** There is suitable habitat for this species in the project area. However, since this species is currently only CNDDB-tracked and not known to be a sensitive species, no impacts are assessed for this analysis.
North American wolverine *Gulo gulo luscus*	ST, CFP, USFS-S	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, and burrows for cover/den area. Hunts in more open areas. Can travel long distances.	**Not Expected.** This species occurs in the TNF only as a transient, and the project area is below its usual elevation range.
Western red bat *Lasiurus blossevillii*	CSSC	It occurs throughout portions of the western and central United States and much of Mexico, Central America, and South America.	Roosts primarily in trees, 2-40 ft above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees protected from above and open below, with open areas for foraging.	**May be Present.** There are no CNDDB or TNF records of this species in the project area. According to the OHV SA and Expansions EA, it may occur or have suitable habitat in the project analysis area (within two miles of China Wall SA).
Sierra Nevada snowshoe hare *Lepus americanus tahoensis*	CSSC	Boreal riparian areas in the Sierra Nevada.	Thickets of deciduous trees in riparian areas, thickets of young conifers, and similar riparian woodlands.	**Not Expected.** There are no CNDDB or TNF records, and suitable habitat for this species is limited in the project area.

Species	Status*	Geographic Distribution [1, 2, 3, 4, 5]	Habitat Requirements [1, 2, 3, 4, 5]	Potential for Occurrence [6, 7]
Sierra marten *Martes caurina sierrae*	USFS-S	Mixed evergreen forests with over 40% crown closure along the Sierra Nevada and the Cascade mountains.	Needs a variety of different-aged stands, particularly old-growth conifers and snags, which provide cavities for dens/nests.	**Not Expected.** CNDDB records for this species range from 1974 to 1986 but none are within 2 miles of the project sites. According to the OHV SA and Expansions EA, this species has no suitable habitat in the China Wall SA project area. The Big Sugar Project EA does not list the trail reroutes as within suitable marten habitat and says that most of the project area is too low in elevation for this species.
Fisher *Pekania pennanti*	CSSC, USFS-S	Northern US to CAN; many populations extirpated in the southern portion of its range.	Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with a high percentage of canopy closure. Uses cavities, snags, logs, and rocky areas for cover and denning. Needs large areas of mature, dense forest.	**Not Expected.** Pacific fishers are unknown to occur within or near the project area or on the TNF. Both the OHV SA and Expansions EA, and the Big Sugar Project EA which includes the trail reroutes, the projects would have no effect on this species.
Sierra Nevada red fox *Vulpes vulpes necator*	FPE, ST, USFS-S	Historically, it has been found in the Cascades down to the Sierra Nevada.	Found in a variety of habitats from wet meadows to forested areas. Use dense vegetation and rocky areas for cover and den sites. Prefer forests interspersed with meadows or alpine fell-fields.	**Not Expected.** According to the OHV SA and Expansions EA, there are no records of this species and no denning habitat in the China Wall SA project area, though foraging habitat is present. This species is not mentioned in the Big Sugar Project EA, which covers the trail reroutes.

***STATUS KEY:**

Federal

FE: listed as Endangered under the Federal Endangered Species Act (FESA)
FT: listed as Threatened under FESA
FPT: proposed for listing as Threatened under FESA
FPE: proposed for listing as Endangered under FESA
FC: Candidate for listing under FESA
USFS-S: United States Forest Service – Sensitive Species

State

SE: listed as Endangered under the California Endangered Species Act (CESA)
ST: listed as Threatened under CESA
SCE: Candidate for listing as Endangered under CESA
CSSC: California Species of Special Concern
CFP: California Fully Protected

Other

CNDDB†: Species tracked by the CNDDB; included for informational purposes only. Species tracked by the CNDDB that do not meet the definition of a special-status species are included in the table for informational purposes only and are excluded from the CEQA analysis.

SOURCES:

1. CDFW California Natural Diversity Database (CNDDB). Rarefind 5. Accessed November 22, 2024.

2. United States Fish and Wildlife Service (USFWS). Information for Planning and Consultation (IPAC). Accessed November 22, 2024.

3. U.S. Department of Agriculture, Forest Service, Pacific Southwest Region. Environmental Assessment: OHV Staging Area Construction and Expansions Project, American River Ranger District, Tahoe National Forest, Placer County, California. January 2013.

4. U.S. Department of Agriculture, Forest Service. Big Sugar Project Environmental Assessment, American River Ranger District, Tahoe National Forest, Placer County, California. June 2019.

5. USFS Tahoe. 2024. Habitat Management Program for Off-Highway Motor Vehicle Recreation Division Department of Parks and Recreation, Grants and Cooperative Agreements Program.

6. Xerces Society, Wildlife Preservation Canada, and York University Environmental Studies. 2024. Bumblebee Watch. Accessed December 2024 at: https://www.bumblebeewatch.org/.