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

***GAVIN NEWSOM**., Governor*
***CHARLTON H. BONHAM,** Director*

October 15, 2025

Diane O'Connor
City of Fort Bragg
416 North Franklin Street
Fort Bragg, CA 95437
doconnor@fortbraggca.gov

Notice of Preparation for the City of Fort Bragg Water Storage Reservoirs and Community Forest Project Environmental Impact Report (SCH#2025070350)

Dear Diane O'Connor:

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) from the City of Fort Bragg (City) as the lead agency for the Water Storage Reservoirs and Community Forest Project (Project) Environmental Impact Report (EIR). CDFW staff reviewed the NOP and attended a public scoping meeting conducted by the City of Fort Bragg on September 16, 2025.

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) As proposed, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.) if the Project proposes to change the bed, channel, or bank of any stream or if the activity may also substantially adversely affect existing fish or wildlife resources through the diversion of water.

CDFW's primary concerns relating to implementing the Project at the proposed location include the potential for: a) significant direct and indirect impacts to Mendocino Cypress Woodland, Bishop Pine Forest, and associated vegetation

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types, b) modification of the hydrology of the Project site, c) direct and indirect impacts to aquatic habitats including streams, riparian areas, and wetlands d) direct and indirect impacts to rare plant and wildlife species including California Species of Special Concern (SSC) and nesting birds, e) erosion and water quality degradation associated with increased recreational use.

CDFW offers the following comments and recommendations on the proposed Project in our role as a Trustee and Responsible agency pursuant to CEQA (Pub. Resource Code, § 21000 et seq.) to assist the City in adequately identifying and assessing the Project's significant, or potentially significant, direct and indirect impacts on biological resources.

Project Description and Location

The proposed Project would include construction of three raw water reservoirs, one or more caretaker units, and a storage building. Each reservoir would have a storage capacity of 45 acre-feet (approximately 14.6 million gallons) with a combined storage capacity of 135 acre-feet (approximately 44 million gallons).The reservoirs would be filled during the winter from water pumped from the Noyo River or Waterfall Gulch, and would be drawn from the reservoirs during summer, when flows in the streams are low. A raw water pipeline, approximately 5,000 feet in length, would be installed adjacent to the reservoirs and connect to the City's existing water infrastructure near the Summers Lane reservoir.

The remainder of the site would be developed as a community forest. The Project would include construction of new trailheads, an 1,800 square-foot parking lot with vault toilets, three picnic areas, nine interpretative areas, and six boardwalk segments. The project would also establish a trail network throughout the site by formalizing some existing trails, and decommissioning others. In addition to pedestrian walking and hiking trails, some may be designated for equestrian and mountain bike access.

The site is located approximately two miles east of State Route 1, approximately 0.3 mile southeast of Summers Lane reservoir. The NOP states the Project site encompasses approximately 582 acres and consists of six parcels identified by Assessor's Parcel Numbers (APNs) 019-070-07, 019-070-10, 019-070-11, 019-080-14, 019-080-16, and 019-080-23.

CDFW has provided comments on two projects previously proposed on the Project site, including the Mendocino Coast Park and Recreation District

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(MCPRD) golf course[1] in 2006, and the Fort Bragg Off-Highway (OHV) Park[2] in 2018. These projects raised similar concerns regarding the potential impacts to biological resources as the currently-proposed Project. Based on CDFW observations and documentation of existing biological resources on the site, development as proposed would potentially impact wetland, stream, and riparian habitats, and Sensitive Natural Communities including Mendocino Cypress Woodland and Bishop Pine Forest.

Environmental Impacts

CEQA Guidelines section 15124 subdivision (a) requires that the precise location and boundaries of the proposed project shall be shown on a detailed map. The draft EIR should disclose the specific location of all Project components, and identify the potential temporary and permanent impacts to biological resources including Sensitive Natural Communities, rare plants, California Species of Special Concern including Sonoma tree vole (*Arborimus pomo*), nesting birds, and streams and wetlands that may occur during all proposed Project activities. (**Recommendation 1**)

CEQA Guidelines section 15125 subdivision (c) states that knowledge of a Project's regional setting is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. The draft EIR should adequately assess all significant impacts to biological resources, considering the context of their regional rarity and uniqueness. **(Recommendation 2)**

An EIR is required to fully assess significant impacts to biological resources from proposed Project activities, including both short-term and long-term effects (CEQA Guidelines, § 15126 subd.(2).) To allow reviewing agencies and members of the public to adequately assess the significant impacts of the Project, the draft EIR should include technical data, maps, plot plans, diagrams, and similar relevant information (CEQA Guidelines, § 15147). (**Recommendation 3**)

<u>Mendocino Cypress Woodland and Bishop Pine Forest Alliances</u>
Between 2015 and 2018, CDFW Vegetation Classification and Mapping Program

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[1] California Department of Fish and Game. January 27, 2006. Review of the Final Environmental Impact Report for the Mendocino Coast Regional Park and Golf Course and Timberland Conversion (State Clearing House #2000052063).

[2] California Department of Fish and Wildlife. March 16, 2018. Notice of Preparation for the Fort Bragg OHV Park Program Environmental Impact Report (State Clearing House #2018022040).

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(VegCAMP) classified and mapped the extent of the Mendocino Cypress Woodland alliance and associated vegetation types[3]. As part of this effort, CDFW conducted fine-scale mapping and classification on the site.

When assessing potential impacts to sensitive plant alliances, CDFW ranks the alliances according to their degree of imperilment as measured by rarity, trends, and threats. Natural Communities[4] with state ranks of S1-S3 are considered Sensitive Natural Communities[5] considered during CEQA review. These habitats as critically Imperiled at very high risk (S1) or highly imperiled or "rare and threatened in California (S2)." Mendocino Cypress Woodland and Bishop Pine Forest alliances are Sensitive Natural Communities with State ranks of S1 and S3, respectively. Mendocino Cypress Woodland alliance also has a G1 Global rank, which categorizes it as a natural community that is imperiled, at high risk of extinction due to a very restricted range, steep declines, or other factors.

CDFW estimates approximately 89 percent of the Project site is comprised of Sensitive Natural Communities. The site may also contain as much as 15 percent of the remaining extent of Mendocino Cypress Woodland and associated vegetation types, including two provisional redwood associations (Redwood-Mendocino cypress (*Sequoia sempervirens-Hesperocyparis pygmaea*) and Redwood-Bishop pine (*Sequoia sempervirens-Pinus muricata*). Based on mapping completed in 2018, CDFW estimates the Site contains at least 68 percent of the total known extent of these associations. [6] See **Table 1** for the Sensitive Natural Communities mapped by CDFW on the proposed Project site in 2018.

CDFW is concerned that Sensitive Natural Communities may be substantially

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[3] California Native Plant Society. 2025. A Manual of California Vegetation, Online Edition. http://www.cnps.org/cnps/vegetation/; searched on September 23, 2025. California Native Plant Society, Sacramento, CA.

[4] California Department of Fish and Wildlife. 2025. Vegetation and Classification Program, Natural Communities. https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Background.

[5] California Department of Fish and Wildlife. February 27, 2025. Sensitive Natural Communities List Only By Life Form. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153721.

[6] Keeler-Wolf, T., D. Hickson, R. Yacoub and M.J. Colletti. 2019. Classification and Mapping of Mendocino Cypress (Hesperocyparis pygmaea) Woodland and Related Vegetation on Oligotrophic Soils, Mendocino and Sonoma Counties, California. Vegetation Classification and Mapping Program, California Department of Fish and Wildlife, Sacramento, CA.

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impacted by changes to hydrology, as a result of Project development, installation and maintenance of the raw water pipeline and associated infrastructure, and recreational use. Grading, vegetation removal, and stormwater water runoff may have significant impacts on Mendocino Cypress Woodland, Bishop Pine Forest and other Sensitive Natural Communities on the site. Sensitive Natural Communities should be assessed and documented following the most current survey protocols, which at this time are CDFW's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.[7] (**Recommendation 4**) Consistent with recommendations provided in a 2018 proposed OHV park NOP comment letter, CDFW recommends development occur outside the minimum 100-foot setback of these sensitive communities. (**Recommendation 5**)

CDFW is unaware of any successful, large-scale restoration of Mendocino Cypress Woodland habitat and associated vegetation types on oligotrophic soil. Consequently, if the Project cannot avoid significant impacts to these Sensitive Natural Communities, the draft EIR should evaluate the feasibility of off-site mitigation through acquisition and preservation in perpetuity of additional in-kind, high-quality habitat to address any potential Project-related impacts to these Sensitive Natural Communities. (**Recommendation 6**) Because habitat preservation as a form of compensatory mitigation results in the direct loss of habitat area, this type of mitigation strategy typically requires higher mitigation ratios than other types of mitigation.

Rare Plant Species

Rare plant species with the potential to occur on the Project site include Mendocino cypress (*Hesperocyparis pygmaea*), Bolander pine (*Pinus contorta ssp. bolanderi*), swamp harebell (*Campanula californica*), and coast lily (*Lilium maritimum*), hair-leaved rush (*Juncus supiniformis*), pygmy manzanita (*Arctostaphylos nummularia ssp. mendocinoensis*), small groundcone (*Kopsiopsis hookeri)* California sedge (*Carex californica*), white beaked-rush (*Rhynchospora alba*), and Methuselah's beard lichen (*Usnea longissima*). Five of these species have a California Rare Plant Rank of 1B.1 or

[7] California Department of Fish and Wildlife. March 20, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities, State of California, California Natural Resources Agency. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline.

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1B.2 and four species have a California Rare Plant Rank of 2B.2 or 2B.3[8]. See **Table 2** for each species' global and state ranks, California rare plant rank, and wetland indicator status[9]. All of these plants meet the definitions of Rare, Threatened, or Endangered under Fish and Game Code sections 1901 et seq., and 2062 et seq. Impacts to these species or their habitat must be analyzed during preparation of the draft EIR, as they meet the definition of Rare or Endangered under CEQA Guidelines section 15125 subdivision (c) and/or section 15380. Rare plants should be assessed and documented following the current protocol, referenced above. As appropriate, avoidance, minimization or mitigation measures should be developed. (**Recommendation 7**)

Wetlands and Streams

California's remaining wetlands provide significant and essential habitat for a wide variety of plant and wildlife species. Executive Order W-59-93 (1993) established California state policy guidelines for wetland conservation. The primary goal of the policy is to ensure no net loss of wetlands, and to achieve a long-term net gain in the quantity, quality, and permanence of wetland acreage in California.

The draft EIR should analyze potential impacts to wetlands. The draft EIR should include a detailed description and map of aquatic habitats on the Project site, which may include streams, riparian areas, seasonally and permanently wetted channels, depressions, springs, seeps, and/or ponds. These areas should be clearly delineated prior to finalizing the development plan, and in consultation with the Regional Water Quality Control Board and CDFW. (**Recommendation 8**)

In addition, the Mendocino Cypress Woodland habitat type is frequently classified as a wetland based on hydrology, due to the presence of poorly-drained, shallow soils with underlying hardpan, and the dominance of wetland vegetation. Due to the unusual hydrologic characteristics of wetlands associated with this Sensitive Natural Community, direct and indirect impacts from altered hydrology and decreased water quality may prove difficult to avoid and mitigate. Based on site-specific conditions and existing regulations, setbacks of at least 100 feet should be established between wetlands and

[8] California Native Plant Society, Rare Plant Program. 2025. Rare Plant Inventory (online edition, v9.5.1). Website https://www.rareplants.cnps.org [accessed 2 October 2025].

[9] U.S. Army Corps of Engineers. 2023. The 2022 National Wetland Plant List, version 3.6. U.S. Army Engineer Research and Development Center, Vicksburg, MS. http://wetland-plants.usace.army.mil/.

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streams, and any proposed development. (**Recommendation 9**)

Components of the Project may be subject to Fish and Game Code section 1602 et seq. If Project activities may substantially divert or obstruct the natural flow, or substantially change or use any material from the bed, channel or bank, of any stream or lake, the City should submit a Lake or Streambed Alteration Notification, and appropriate fees. This includes streams that are intermittent (dry for periods of time) or perennial (flow year-round), and streams with a subsurface flow.
(**Recommendation 10**)

The City's municipal water is sourced from three stream diversions (Noyo River, Newman Gulch, and Waterfall Gulch). In past comments related to development (including a 2015 comment letter on the proposed Hare Creek Center Project[10]), CDFW has recommended that the City should develop a long-term, comprehensive plan to address water use and water shortage concerns. While CDFW is generally supportive of efforts to increase water storage and reduce water diversion during the dry season, scoping for the current project should also include an assessment of the potential for quantifiable water conservation goals, as well as an assessment of the potential for alternative water sources and storage locations. (**Recommendation 11**)

Direct and Indirect Impacts

The EIR should provide thorough discussion of the direct and indirect impacts expected to adversely affect biological resources as a result of the Project, including implementation, maintenance, and on-going recreational use as described under CEQA Guidelines section 15126. The draft EIR should include hydrological and hydraulic analyses to assess the potential direct or indirect impacts to terrestrial and aquatic habitats on the Project site and adjacent properties, including streams, wetlands, and Sensitive Natural Communities. (**Recommendation 12)**

Cumulative Impacts

The City (and Mendocino County) currently lack a comprehensive plan for protecting Sensitive Natural Communities and habitats, including Mendocino Cypress Woodland and Bishop Pine Forest. Impacts to these sensitive habitats are ongoing, especially outside of the Coastal Zone. The draft EIR's cumulative

[10] California Department of Fish and Wildlife. January 20, 2015. Notice of Public Hearing and Notice of Intent to Adopt Mitigated Negative Declaration (State Clearing House #2014122062)

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impacts section should analyze and disclose how the proposed Project may contribute to incremental impacts, with consideration given to other closely-related past, present or reasonably foreseeable probable future projects (CEQA Guidelines, § 15355). **(Recommendation 13)**

Project Alternatives and Mitigation

The purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to identify how those significant effects can be mitigated or avoided. (Pub. Resources Code, § 21002 subd.
(1).) The EIR should describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. Because the EIR must identify ways to mitigate or avoid the significant effects the Project may have on the environment, the discussion of alternatives should focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the Project's objectives, or would be more costly (CEQA Guidelines, § 15126 subd. (6).)

Given the documented presence of Sensitive Natural Communities and other biological resources on the currently-proposed project site, CDFW recommends the draft EIR should describe and analyze a range of alternative Project sites that will allow the City to meet its water storage objectives, while avoiding or substantially lessening the potential significant effects of the Project. For the purpose of analyzing environmentally superior alternatives, project alternatives should include locations lacking sensitive species or habitats. (**Recommendation 14**) If the City determines it is infeasible for the project to be located where potential significant effects can be avoided or minimized, adequate and feasible mitigation measures must be proposed. (**Recommendation 15**)

The draft EIR should analyze and disclose all probable costs of the proposed Project, including costs for mitigation, including land acquisition, restoration, maintenance and monitoring that would likely be required to adequately mitigate for Project-related impacts at the currently-proposed Project site. (**Recommendation 16**)

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City of Fort Bragg Land Use Policies

The City's Inland General Plan (Element 4 – Conservation, Open Space, Energy, and Parks)[11] includes goals and policies for the preservation of natural areas, wildlife habitats, and water resources. The key objectives include protecting environmentally sensitive areas such as riparian corridors, wetlands, and forested areas and promoting sustainable land uses that minimize environmental impacts, consistent with zoning and development standards. The City's Inland Land Use and Development Code[12] provides standards for proposed development and new land uses to ensure the protection of sensitive resources (Chapter 18.50), stream and riparian resources (Chapter 18.52), and wetlands (Chapter 18.58). The Code also provides development standards including setbacks for wetlands (50 feet) and streams (50 feet), development of site-specific stream channel analysis, requirements for the protection of sensitive habitat areas, creeks and riparian areas, and wetlands where development is proposed adjacent to, or within habitat areas. The proposed Project should be consistent with the City's policies, ordinances, plans, and goals for the protection of sensitive resources, streams, riparian areas, and wetlands. (**Recommendation 17**).

Submittal of Biological Data to CNDDB

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). Additional information and instructions for data submission can be found on the CNDDB website (https://wildlife.ca.gov/Data/CNDDB). (**Recommendation 18**).

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[11] City of Fort Bragg Inland Land Use, Development General Plan. November 2012. Element 4: Conservation, Open Space, and Parks Element.

[12] City of Fort Bragg. April 14, 2025. Inland Land use and Development Code. Section 18.50 – 18.58.

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RECOMMENDATIONS

1. The draft EIR should disclose the specific location of all Project components, and identify the potential temporary and permanent impacts to biological resources including Sensitive Natural Communities, rare plants, California Species of Special Concern including Sonoma tree vole (*Arborimus pomo*), nesting birds, and streams and wetlands that may occur during all proposed Project activities.

2. The draft EIR should adequately assess all significant impacts to biological resources, considering the context of their regional rarity and uniqueness.

3. To allow reviewing agencies and members of the public to adequately assess the significant impacts of the Project, the draft EIR should include technical data, maps, plot plans, diagrams, and similar relevant information (CEQA Guidelines, § 15147).

4. Sensitive Natural Communities should be assessed and documented following the most current survey protocols, which at this time are CDFW's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*.

5. Consistent with recommendations provided in a 2018 proposed OHV park NOP comment letter, CDFW recommends development occur outside the minimum 100-foot setback of these sensitive communities.

6. If the Project cannot avoid significant impacts to Sensitive Natural Communities, the draft EIR should evaluate the feasibility of off-site mitigation through acquisition and preservation in perpetuity of additional in-kind, high-quality habitat to address any potential Project-related impacts to these Sensitive Natural Communities.

7. Rare plants should be assessed and documented following the current protocol, referenced in Recommendation 4. As appropriate, avoidance, minimization or mitigation measures should be developed.

8. The draft EIR should include a detailed description and map of aquatic habitats on the Project site, which may include streams, riparian areas, seasonally and permanently wetted channels, depressions, springs, seeps, and/or ponds. These areas should be clearly delineated prior to finalizing the

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development plan, and in consultation with the Regional Water Quality Control Board and CDFW.

9. Based on site-specific conditions and existing regulations, setbacks of at least 100 feet should be established between wetlands and streams, and any proposed development.

10. If Project activities may substantially divert or obstruct the natural flow, or substantially change or use any material from the bed, channel or bank, of any stream or lake, the City should submit a Lake or Streambed Alteration Notification, and appropriate fees.

11. While CDFW is generally supportive of efforts to increase water storage and reduce water diversion during the dry season, scoping for the current project should also include an assessment of the potential for quantifiable water conservation goals, as well as an assessment of the potential for alternative water sources and storage locations.

12. Hydrological and hydraulic analyses to assess the potential direct or indirect impacts to terrestrial and aquatic habitats on the Project site and adjacent properties, including streams, wetlands, and Sensitive Natural Communities.

13. The draft EIR's cumulative impacts section should analyze and disclose how the proposed Project may contribute to incremental impacts, with consideration given to other closely-related past, present or reasonably foreseeable probable future projects (CEQA Guidelines, § 15355).

14. For the purpose of analyzing environmentally superior alternatives, project alternatives should include locations lacking sensitive species or habitats.

15. If the City determines it is infeasible for the project to be located where potential significant effects can be avoided or minimized, adequate and feasible mitigation measures must be proposed.

16. The draft EIR should analyze and disclose all probable costs of the proposed Project, including costs for mitigation, including land acquisition, restoration, maintenance and monitoring that would likely be required to adequately mitigate for Project-related impacts at the currently-proposed Project site.

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17. The proposed Project should be consistent with the City's policies, ordinances, plans, and goals for the protection of sensitive resources, streams, riparian areas, and wetlands.

18. Please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB).

SUMMARY

We look forward to working with the City to support its goals, while protecting the fish and wildlife resources held in trust for all Californians. The Department is available for consultation during all stages of the CEQA process, to share information related to fish and wildlife resources, and discuss potential Project alternatives, potential impacts, and/or proposed mitigation. If you have any questions or would like to request a meeting please contact Senior Environmental Scientist Specialist Jennifer Garrison or Senior Environmental Scientist Supervisor Angela Liebenberg at CEQAreferrals@wildlife.ca.gov.

Sincerely,

Signed by:
Jennifer Nguyen
05C173B79770419...

Jennifer Nguyen
Environmental Program Manager

ec: California Department of Fish and Wildlife
Angela Liebenberg, Jennifer Garrison, Jon Hendrix, Michael van Hattem

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Table 1.
CDFW Mapped Sensitive Natural Communities on the Proposed Project Site (2018)

Sensitive Natural Community Name	**Global/ State Rank**	**Acres**	**Percentage of 586[13] Acres**
Bishop pine – tanoak Association (*Pinus muricata - Notholithocarpus densiflorus*)	G3/S3	< 0.1	< 0.1%
Bishop pine – golden chinquapin Association (*Pinus muricata - Chrysolepis chrysophylla / Arctostaphylos nummularia*)	G2/S2	19.7	3.4%
Coast redwood Alliance (*Sequoia sempervirens*)	G3/S3	28.5	4.9%
Coast redwood – Bishop pine Provisional Association (*Sequoia sempervirens - Pinus muricata*)	G3/S3 (Proposed)	129.8	22.1%
Coast redwood – Mendocino cypress Provisional Association (*Sequoia sempervirens - Hesperocyparis pygmaea*)	G1/S1	173.8	29.7%
Golden chinquapin Alliance *Chrysolepis chrysophylla*	G2/S2	1.0	0.2%
Golden chinquapin/evergreen huckleberry Association *Chrysolepis chrysophylla / Vaccinium ovatum*	G2/S2	1.5	0.3%

[13] The total area mapped by CDFW (586 acres) differs slightly from the acreage estimated in the Project Description (582 acres).

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Mendocino cypress Alliance (*Hesperocyparis pygmaea*)	G2/S2	20.9	3.6%
Mendocino cypress – Bishop pine/glossy leaf manzanita Association (*Hesperocyparis pygmaea - Pinus muricata / Arctostaphylos nummularia*)	G2/S2	9.7	1.7%
Mendocino cypress – Bolander's beach pine – Bishop pine/rhododendron Association (*Hesperocyparis pygmaea - Pinus contorta ssp. Bolanderi - Pinus muricata / Rhododendron macrophyllum*)	G2/S2	65.0	11.1%
Mendocino cypress – Bolander's beach pine/western Labrador tea Association (*Hesperocyparis pygmaea - Pinus contorta bolanderi / Rhododendron columbianum*)	G2/S2	68.0	11.6%
Sensitive Natural Community Acreage (Rounded Total)		**518**	**89%**

Sources: ESRI Aerial Basemap, CDFW VegCAMP, property boundary derived from Mendocino County parcels (DMP Landvision). June 21, 2018.

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Table 2.
Mendocino Cypress Woodland Alliance's Rare Plant and Lichen Species

Common Name Scientific Name	**Global Rank**	**State Rank**	**CA Rare Plant Rank**	**Wetland Status**	**Life form and Characteristics**
Bolander's beach pine *Pinus contorta* ssp. *bolanderi*	G5T2	S2	1B.2	Facultative	Perennial evergreen tree
California sedge *Carex californica*	G5	S2	2B.2	Facultative Wetland	Perennial rhizomatous herb
Coast lily *Lilium maritimum*	G2	S2	1B.1	Facultative Wetland	Perennial bulbiferous herb
Hair-leaved rush *Juncus supiniformis*	G5	S1	2B.2	Obligate	Perennial rhizomatous herb
Mendocino cypress *Hesperocyparis pygmaea*	G1	S1	1B.2	-	Perennial evergreen tree
Methuselah's beard lichen *Usnea longissima*	G4	S4	4.2	-	Epiphytic lichen
Pygmy manzanita *Arctostaphylos nummularia* ssp. *mendocinoensis*	G3?T1	S1	1B.2	-	Perennial shrub

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Small groundcone *Kopsiopsis hookeri*	G4	S1/S2	2B.3	-	Perennial rhizomatous and parasitic herb
Swamp harebell *Campanula californica*	G3	S3	1B.2	Obligate	Perennial rhizomatous herb
White beaked-rush *Rhynchospora alba*	G5	S2	2B.2	Obligate	Perennial rhizomatous herb

Sources: California Native Plant Society Inventory of Rare Plants (2025) and United States Army Corps of engineers National Wetland Plant List (2023).