



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
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www.wildlife.ca.gov

GAVIN NEWSOM, Governor
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July 25, 2019

Juliana Lucchesi
City Planner
City of Mt. Shasta
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Mt. Shasta, CA 96067

Governor's Office of Planning & Research

JULY 26 2019

STATE CLEARINGHOUSE

Subject: Revised and Recirculated Initial Study/Mitigated Negative Declaration for Freeze Mini-Storage and Car Wash Project, Siskiyou County, State Clearinghouse Number 2017072042

Dear Ms. Lucchesi:

The California Department of Fish and Wildlife (Department) has reviewed the initial study/mitigated negative declaration (IS/MND) for the above-referenced project (Project). The Department is the Trustee Agency for the State's fish and wildlife resources and holds those resources in trust by statute for all the people of the State, pursuant to Fish and Game Code sections 711.7 (a) and 1802; Public Resources Code section 21070, and the California Environmental Quality Act (CEQA) Guidelines section 15386 (a). The Department 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. The Department is also a Responsible Agency pursuant to CEQA. As such, the Department administers the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq), the Lake or Streambed Alteration program (Fish & G. Code, § 1600 et seq) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources.

The Department offers the following comments and recommendations on the Project in our role as the State's trustee for fish and wildlife resources and as a Responsible Agency pursuant to CEQA.

Project Description

This Project was previously circulated in a draft IS/MND in July 2017 and is now the subject of a revised and recirculated IS/MND. The Project consists of the development of a mini-storage and car wash facility on three parcels in the City of Mt. Shasta, adjacent to the Spring Hills Trail. The mini-storage will consist of one office building, 153 storage units in three separate single-story building, a parking area and landscaping/snow storage, security lighting throughout the Project site, a 7-foot-tall perimeter security fence, and installation of a 5 foot-wide sidewalk on Ski Village Drive. The car wash would consist of a storage/equipment building, an automatic car wash,

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three self-wash bays, four vacuum stations, landscaping/snow storage areas, and a trash enclosure. The Project also includes the extension of a water line.

Comments and Recommendations

The Department offers the following comments and recommendations to assist the Lead Agency in adequately identifying and/or mitigating the Project's impacts to biological resources.

Potential Impacts to Wetlands

Department staff viewed the Project site from the parking lot of the Spring Hill Trail and surrounding roadways and observed several wetland indicator plant species that warrant the completion of a wetland delineation on the Project site. These species include cottonwood (*Populus trichocarpa*) and large stands of Himalayan blackberry (*Rubus armeniacus*).

It is the policy¹ of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, mitigation assures there will be "no net loss" of either wetland habitat values or acreage. If wetlands are found to occur on the Project site, mitigation ratios should be developed that will ensure no net loss of wetland or riparian habitat values or acreage will occur as a result of Project implementation.

The Department has adopted the U.S Fish and Wildlife Service (USFWS) wetland definition, which also utilizes hydric soils, saturation or inundation, and vegetative criteria, but requires the presence of only one of these criteria (rather than all three as required by the U.S. Army Corps of Engineers) in order to classify an area as a wetland. Mitigation developed for this Project should take into account the Department's wetland definition, which may extend past that of the Corps.

Botanical Surveys

Appendix C of the IS/MND consists of lists of species with potential to occur on the Project site generated from the Department's California Natural Diversity Database (CNDDDB), the USFWS Information for Planning and Conservation (IPaC) tool and Critical Habitat Portal, and the California Native Plant Society Inventory of Rare and Endangered Plants of California database. These results include many sensitive plant species. The IS/MND states the only vegetative community on the Project site is non-native grassland, with evidence of past disturbance. The IS/MND concludes that special-status plants are not anticipated to occur on the

¹ Fish and Game Commission policy available at: <http://www.fgc.ca.gov/policy/p4misc.aspx#WETLANDS>

Project site; however, a rare plant survey was not conducted nor was a species-specific analysis provided for the special-status plant species known to occur in the Project vicinity. Many species of special-status plants are known to occur in disturbed areas.

Due to the occurrence of numerous special-status species in the local area, the Department recommends the completion of rare plant surveys following the Department's 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* available at:

<https://www.wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>. These surveys must be conducted during the appropriate time of year to identify species of concern and should include areas with both direct and indirect impacts. Impacts to special-status species and sensitive natural communities found during surveys should be analyzed, and specific mitigation should be required to reduce any impacts to less than significant.

Invasive Species

Invasive species have been identified as occupying the Project area. Invasive plant species alter habitat suitability for many species by reducing or eliminating native vegetation essential for food and cover. Additionally, invasive plant species quickly colonize disturbed areas, and once an area is colonized, control of infestation to adjacent habitats is challenging. Several sensitive plant species have been identified with potential to occur in close proximity to Project activities. In order to avoid impacting these species, the Department recommends the inclusion of invasive plant species control measures in the IS/MND. These measures may include working from weed-free areas into infested areas if necessary, cleaning equipment prior to entering and exiting a new site, and post-construction monitoring to ensure no new infestations of invasive species occur. Prevention best management practices and guidelines for invasive plants can be found on the California Invasive Plant Council's website at: <http://www.cal-ipc.org/ip/prevention/index.php>.

Environmental Data

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 CNDDDB. The CNDDDB field survey form can be found at the following link:

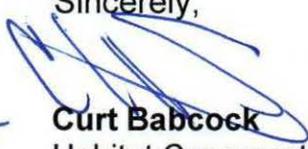
<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following e-mail address: CNDDDB@wildlife.ca.gov.

Juliana Lucchesi, City Planner
City of Mt. Shasta
July 25, 2019
Page 4

The Department appreciates the opportunity to comment on this revised and recirculated IS/MND to assist the Lead Agency in identifying and mitigating potentially significant impacts of the Project on biological resources. If you have any questions, please contact Kristin Hubbard, Environmental Scientist, at (530) 225-2138 or kristin.hubbard@wildlife.ca.gov.

Sincerely,

for


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