



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
VALERIE TERMINI, Acting Director



January 26, 2026

Dan Newton
City Manager
City of Susanville
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SUBJECT: Review of Susanville Travel Stop, Lassen County, State Clearing House Number 2025011078

Dear Dan Newton:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR), dated December 2025, for the above-referenced project (Project) posted for public review on December 16, 2025. CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

CDFW's Role

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; CEQA Guidelines § 15386, subd. (a)). CDFW, in its Trustee Agency 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). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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state listed rare plants pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code § 1900 et seq.), authorization as provided by the applicable Fish and Game Code may be required.

Project Description:

The City of Susanville (Lead Agency) is proposing to construct and operate a full-service travel stop on approximately 14.15 acres of vacant land to the southeast of the City of Susanville. The Project includes a 24-hour travel stop, a dog park, Recreational Vehicle (RV) dump station, bioretention basins, truck, RV and automobile parking areas, landscaping/lighting, and 10-space overnight RV park.

Biological Setting:

The Project area is located on a 79.6-acre parcel situated to the southeast of the City of Susanville. The area of disturbance will primarily be limited to 14.15-acres along the southeastern boundary and existing roadways. The MND describes the Project area to be dominated by annual grassland, devoid of any trees, with some sagebrush, wetlands and riparian habitat along the northeastern boundary. The Susan River flows along the northern parcel boundary of the Project area.

The Susan River's riverine, riparian, and wetland habitats are home to an abundant amount of species including, but not limited to, Lahontan Lake tui chub (*Siphateles bicolor pectinifer*, Species of Special Concern [SSC]), Lahontan mountain sucker (*Catostomus Lahontan*, SSC), greater sandhill crane (*Antigone canadensis tabida*, CESA Threatened), Swainson's Hawk (*Buteo swainsoni*, CESA Threatened), Tricolored blackbird (*Agelaius tricolor*, CESA Threatened), bank swallow (*Riparia riparia*, CESA Threatened), western bumble bee (*Bombus occidentalis*, CESA Candidate) and Aleppo avens (*Geum aleppicum*, California Rare Plant Rank 2B.2).

Comments and Recommendations

In March 2025, CDFW responded to the Lead Agency's request for comment on the [Notice of Preparation](https://ceqanet.lci.ca.gov/2025011078)² for the above referenced Project. CDFW offers the following comments and recommendations to further assist the Lead Agency in adequately identifying, avoiding, and minimizing potentially significant, direct, and indirect impacts on biological resources.

² <https://ceqanet.lci.ca.gov/2025011078>

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Deferral of Protocol Surveys

The DEIR defers surveys for western bumble bee and western pond turtle to a 14-day pre-construction window. CEQA discourages deferral of surveys essential for making informed impact assessments and prescribing most relevant avoidance, minimization and mitigation measures (CEQA Guidelines §15126.4(a)(1)(B):). CDFW recommends that the Lead Agency conditions protocol surveys for all species with potential to occur prior to Project approval. Survey results should inform avoidance and minimization measures included in the DEIR, while also including potentially applicable mitigation with clear performance standards, monitoring, and adaptive management. Without these survey results, the DEIR does not provide substantial evidence to adequately support its concluded impact assessment for these species.

Surveys prior to Project approval are particularly important for CESA-listed species like the CESA-Candidate western bumble bee, as this species has the potential to occur in the Project area during all life-cycle phases/year-round. The western bumble bee's potential to occur is not limited to the foraging/blooming season, as the DEIR infers, and impacts to a CESA-listed species may trigger a mandatory finding of significance (CEQA Guidelines §15065(a)(1)).

Bumble Bees

On September 30, 2022, the candidacy of four California bumble bee species was reinstated under the CESA, including the Western Bumble Bee (*Bombus occidentalis*, WBB), whose range bisects the Project area. As such, these bumble bees receive the same legal protection afforded to an endangered or threatened species (Fish and Game Code, §§ 2074.2 & 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt engage in any of these activities), possess, purchase, or sell CESA-listed species, or any part or product thereof (Fish and Game Code, §§ 86, 2080, 2085). Western bumble bees were once common throughout most of California and the western United States however, research and analysis by the Xerces Society suggests there have been sharp declines in their relative abundance due to habitat disturbances, increasing temperatures, drought, and pesticide use.

Ground disturbance and land modification associated with the development of this Project has the potential to significantly impact local bumble bee populations if present, therefore, CDFW recommends a qualified biologist to conduct a thorough habitat assessment and protocol bumble bee surveys prior to Project approval. The proposed 14-day pre-construction survey may not align with the colony active period and does not include a sufficient number of surveys for results to be supported.

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Since the DEIR confirms potentially suitable habitat may occur throughout and adjacent to the Project area, CDFW recommends surveying and employing avoidance and minimization measures in accordance with CDFW's [June 2023 Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#)³.

The bumble bee habitat assessment and survey results should be included in the Final EIR. Without appropriate avoidance and minimization measures, potentially significant impacts associated with Project ground- and vegetation-disturbing activities, include loss of foraging plants, changes in foraging behavior, burrow collapse resulting in entrapment or crushing in burrows, nest abandonment, reduced nest success, reduced health, and vigor of eggs, young, and/or queens, in addition to direct mortality, the latter being "take" as defined by Fish and Game Code section 86.

Please note, the survey considerations document indicates at least 3 on-site surveys conducted by qualified biologists spaced 2-4 weeks apart during the Colony Active Period. Additionally, the survey dates must consider the variability in resource use by the candidate species and floral resource phenology within the Project area. Generally, the WBB colony active period is April-September, but will vary within that window depending on the location, elevation, seasonal rainfall, average ambient air temperatures, and local seasonal weather conditions. According to the Bumble Bee Watch⁴, a verified WBB observation occurred west of Susanville in August 2024.

Nesting Birds

The DEIR proposes pre-construction nesting bird surveys 14 days prior to the start of construction. CDFW recommends revising this avoidance and minimization measure to no more than seven days prior to the start of construction. Since birds can establish new nests in a matter of days, a survey conducted 14 days before construction may no longer reflect current conditions, leading to missed active nests. Generally, CDFW recommends the following to avoid potentially significant impacts to nesting birds:

To avoid impacts to nesting birds protected under Fish & Game Code Sections 3503 and 3503.5 and the federal Migratory Bird Treaty Act, one of the following should be implemented:

³ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

⁴ <https://www.bumblebeewatch.org/>

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a) Vegetation removal, land modification and ground-disturbing activities should occur between September 1 and January 31, when birds are not anticipated to be nesting; or

b) If vegetation removal, land modification and ground disturbing activities must occur during the nesting season, a pre-construction nesting bird survey should be conducted by a qualified biologist to identify active nests in and adjacent to the Project area.

Surveys should begin prior to sunrise and continue until vegetation and nests have been sufficiently observed. The survey should consider acoustic impacts and line of sight Project disturbances to determine a sufficient survey radius to maximize observations of nesting birds. A nesting bird survey report should be prepared and, at a minimum, the report should include a description of the area surveyed, date and time of the survey, ambient conditions, bird species observed, a description of any active nests observed, any evidence of breeding behaviors (e.g., courtship, carrying nest materials or food, etc.), and a description of any outstanding conditions that may have impacted the survey results (e.g., weather conditions, excess noise, presence of predators).

If an active nest is located during pre-construction surveys, a non-disturbance buffer should be established around the nest by a qualified biologist in consultation with CDFW and U.S. Fish and Wildlife Service to comply with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists.

Nesting bird surveys should be conducted no more than one week prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction nesting bird survey, the site should be resurveyed.

River and Riparian Protection

A buffer distance is not clearly stated in Mitigation Measure 3.3-3 to avoid and minimize impacts from Project activities on the Susan River and its associated riparian habitat. CDFW recommends a minimum buffer of 100-feet for construction disturbance and permanent development from the Susan River riparian corridor to better protect ecological function and wildlife from indirect impacts commonly associated with travel centers, such as concentrated lighting and increased noise regimes.

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Additionally, the DEIR indicates using flagging or high visibility fencing to demarcate a boundary of riparian habitat. CDFW recommends against the use of high visibility fencing due to the risk of obstruction to terrestrial wildlife connectivity and potential for entanglement. CDFW recommends revising Mitigation Measure 3.3-3 to remove fencing for demarcation by using flagging and identifying boundaries clearly in the construction drawings and contractor work plans.

Wildlife Friendly Fencing

The DEIR indicates an old, barbed wire fence currently surrounds the parcel. CDFW understands fences are essential for human safety and the control of livestock, however, inappropriately designed and/or installed fencing may create serious hazards for wildlife. Therefore, CDFW encourages the Lead Agency to consider designing and constructing perimeter fencing with wildlife friendly fencing techniques to reduce the potential of injury or death. Please consult [A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind](https://fwp.mt.gov/binaries/content/assets/fwpc/conservation/land-owner-wildlife-resources/a_landowners_guide_to_wildlife_friendly_fences.pdf)⁵ for construction recommendations and use of wildlife friendly fencing. CDFW staff are also available to assist in providing further recommendations for effective wildlife friendly fencing techniques.

Noxious Weed and Invasive Species Management

The DEIR acknowledges noxious weeds and invasive plant species occur throughout the Project area but does not include a plan to prevent spread during construction. DEIR NR29 Policy on page 133 states: "*The County supports strong measures to eliminate or prevent the spread of invasive and noxious weeds and plant species including, but not limited to, medusahead, yellow starthistle, and perennial pepperweed (whitetop), and to control the adverse effects from the excessive spreading of such species as juniper and cheatgrass*".

CDFW recommends including an Invasive Species Prevention and Management Plan in the final EIR that includes pre-construction mapping, clean-equipment protocols, weed-free materials and any proposed noxious weed treatment. Without this plan, the Project risks exacerbating invasive species impacts on nearby sensitive habitats.

Pesticide Use

If treating noxious weeds or invasive species includes applying pesticides:

⁵ https://fwp.mt.gov/binaries/content/assets/fwpc/conservation/land-owner-wildlife-resources/a_landowners_guide_to_wildlife_friendly_fences.pdf

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- Follow the best management practices described by the [Guidance to Protect Habitat from Pesticide Contamination](#)⁶.
- Avoid using pesticides marked with the US Environmental Protection Agency's bee hazard icon.
- Avoid spraying pesticides onto any flowering plant.
- Use pesticides with a short residual toxicity to bees; bee pesticide toxicity can be checked via UC ANR's [Bee Precaution Database](#)⁷.
- Use targeted application instead of broadcast spraying whenever possible.
- Avoid mixtures of pesticides as they are only evaluated in scenarios in which they are not mixed; thus, potentially harmful synergies are unknown.
- All pesticide applications must be conducted by a Licensed and Certified Pesticide Applicator and should be used as directed by the manufacturer.

Additional guidance on this topic is offered by [Xerces Smarter Pest Management: Protecting Pollinators](#)⁸, the [United States Environmental Protection Agency](#)⁹ and the [California Department of Pesticide Regulation](#)¹⁰.

California Endangered Species Act

The Project has the potential to impact CESA-listed species. Please be advised that a [CESA Incidental Take Permit](#)¹¹ must be obtained if the Project has the potential to result in "take" (hunt, pursue, catch, capture, kill, or attempt thereof) of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project has the potential to result in take of a CESA-listed species, early consultation is encouraged, as significant modification to the Project may be necessary to minimize and fully mitigate impacts as required by Fish and Game Code section 2081(b)(2).

⁶ https://xerces.org/sites/default/files/2019-10/16-024_01_XercesSoc_Guidance-to-Protect-Habitat-from-Pesticides_web.pdf

⁷ <https://www2.ipm.ucanr.edu/bee precaution/>

⁸ <https://xerces.org/publications/fact-sheets/smarter-pest-management-protecting-pollinators-at-home>

⁹ <https://www.epa.gov/pollinator-protection/epa-actions-protect-pollinators>

¹⁰ <https://www.cdpr.ca.gov/enforcement/>

¹¹ <https://wildlife.ca.gov/Conservation/CESA/Permitting>

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Lake and Streambed Alteration Agreement

Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of the bed, channel, or bank of any river, stream, or lake; or
- Substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

To obtain information about the 1602 Notification process, please access the [Lake and Streambed Alteration Program](#)¹².

Submitting Data

CEQA requires that information developed in environmental documents is incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during surveys to the [California Natural Diversity Database](#)¹³ (CNDDDB).

Promoting Collaboration

CDFW is charged with preserving and protecting the state's diverse ecosystems and wildlife; therefore, CDFW maintains a strong commitment to collaborate with other state agencies. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization strategies for the benefit of California's sensitive resources and aligning regulatory frameworks.

¹² <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

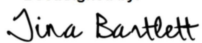
¹³ <https://wildlife.ca.gov/Data/CNDDDB>

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Conclusion

CDFW appreciates the opportunity to comment on the DEIR and to assist the Lead Agency in identifying, avoiding, minimizing, and mitigating potentially significant Project impacts to biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:


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Tina Bartlett, Regional Manager
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cc: State Clearinghouse
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