



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 17, 2025

Drew Morgan
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Subject: Review of Steve Manning Construction, Inc. Contractor Storage Yard Project, Amendment Application AMND 2024-00295 to Site Plan Review SPR-19-90, State Clearinghouse Number 2025090992

Dear Drew Morgan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND), dated September 22, 2025, for the above-referenced project (Project). 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 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

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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Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) 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.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

Project Description

As outlined in the referral packet, the proposed Project is described as follows:

"The project applicant, Steve Manning Construction, is seeking approval to expand an existing contractor storage yard by approximately 3.24 acres for circulation and outdoor storage of heavy equipment on properties located at 4977 Mountain Lakes Boulevard and 5000 Caterpillar Road. There is currently one 8,500 square foot commercial building located on the 4977 Mountain Lakes Boulevard property, utilized as an office building and storage warehouse. The remainder of the property is utilized as a contractor storage yard storing heavy equipment. The project proposes to utilize 3.24 acres of the property the south, 5000 Caterpillar Road, to further expand their existing storage yard business. The existing storage yard currently has all required City of Redding utilities located along the property frontage, and Mountain Lakes Boulevard will be utilized for public access to the storage yard. With all street, utility, and drainage improvements already existing, no off-site improvements are proposed with the project."

Comments and Recommendations

CDFW offers the following comments and recommendations to assist the Lead Agency in adequately identifying, avoiding, and minimizing potentially significant, direct, and indirect impacts on biological resources with the implementation of the Project.

Rare Plants

Mitigation Measure (MM) Bio-1 states, "If any ground disturbance occurs within 25 feet of an ephemeral stream or 50 feet of an intermittent stream, then surveys for the potentially occurring plant species shall be completed prior to disturbance of any vegetation in this area. Surveys should comply with CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant

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Populations and Sensitive Natural Communities (2018). If no special-status plants are found, no further measures pertaining to special-status plants are necessary. If special status plants are observed, then plants should be avoided with implementation of a 10-foot non-disturbance buffer. If avoidance is not possible, then consultation with CDFW shall occur to determine the appropriate mitigation measures."

The potentially occurring rare plants identified in the biological resources assessment (BRA) are Sulphur Creek brodiaea (*Brodiaea matsonii*; California rare plant rank [CNPR] 1B.1) and maverick clover (*Trifolium piorkowskii*; CNPR 1B.2), which are not obligate wetland species and may occur in upland grassland and woodland habitats. MM Bio-1 should not limit botanical surveys for special status plants to just the areas within close proximity of the stream; botanical surveys should cover the entirety of the Project disturbance footprint.

Oaks and Oak Woodlands

According to the BRA and aerial imagery, blue oak woodland habitat exists on the Project parcel. Blue oak woodland is classified as a State Rank 4 [Sensitive Natural Community](#)², which is at moderate risk of extinction due to restricted range, relatively few populations, low regeneration, overall ecological benefits, and susceptibility to long term climate changes. The ongoing loss of oak woodlands throughout Shasta County without adequate mitigation is resulting in a cumulative total loss of oak woodlands in the region.

The ISMND did not disclose how many oak trees will be removed for Project construction and operations. Lead Agencies have a responsibility under section 21083.2 of the California Public Resources Code to consider cumulative impacts to oak woodlands and their significance and have the authority to require mitigation for impacts such as land preservation, enhancement, restoration, and conservation anywhere that is within the general ecological subregion (i.e. within the northern Central Valley).

Because an inventory of oak trees to be removed was not disclosed, and mitigation for impacts to oak tree removal was not proposed, CDFW cannot comment on specific Project impacts to intact oak woodland and whether the goal of 'no net loss' of oak woodland habitat has been achieved.

² <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

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Without specific analysis of impacts to oak woodlands, the MND should emphasize the intent to avoid take of oak species through minor alterations of the proposed Project footprint. The MND should also report the number, species, and size of oak trees that cannot be avoided and must be taken. Mitigation for the take of oaks should be on-site to the extent feasible, and if off-site mitigation is necessary, it should emphasize the creation of oak communities rather than the planting of scattered individual trees. In order to reduce the significance of impact to oak species, CDFW recommends the following mitigation ratios:

- <1" dbh replaced at a minimum 1:1 mitigation ratio
- 1-11" dbh replaced at a minimum 6:1 mitigation ratio
- 12-18" dbh replaced at a minimum 8:1 mitigation ratio
- 18" dbh replaced at a minimum 10:1 mitigation ratio

The MND should include a Mitigation Monitoring Plan for both oaks and any impacted riparian habitat. Oak monitoring should include success criteria for 100% success of plantings until four inches dbh, and protection of the trees in perpetuity.

Aquatic, Riparian, and Wetland Habitats and Mapping

According to the BRA and aerial imagery, multiple streams and potential associated wetlands occur on the Project site, though a formal wetland delineation was not included in the ISMND. CDFW discourages disturbance, staging, and development in these sensitive areas. CDFW considers impacts to these habitats to be potentially significant and strongly encourages the Lead Agency to ensure Project design will avoid such habitats. Without formal wetland delineation and mapping, CDFW cannot comment on whether wetlands or aquatic features will be directly or indirectly impacted.

A formal wetland delineation should have been conducted in the planning phase of this project and incorporated into the CEQA document, and protective buffers should have been prescribed in order to conserve wetland resources and their habitat value. To identify the locations of development setbacks from wetlands, the Project should provide a wetland delineation, prepared by a qualified wetland scientist, that satisfies the requirements of the Army Corps of Engineers Wetland Delineation Manual and the associated Western Mountains, Valleys, and Coast Regional Supplements, as appropriate. CDFW recommends 100-ft development setbacks from perennial wetlands and 50-ft setbacks from seasonal wetlands.

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Low Impact Development

The Project area is adjacent to suitable habitat for aquatic special status species. CDFW recommends the implementation of [low impact development](#)³ (LID) strategies to prevent a net-increase in stormwater runoff from new development. LID strategies may include permeable pavement, vegetated stormwater bio-swales and retention basins to treat, retain, and infiltrate stormwater runoff onsite. These LID strategies are typically designed to prevent project-generated stormwater runoff from exceeding that of a 100-year storm event to protect water quality and manage stormwater as close to its source as possible, thus mitigating potential flooding and outflow of toxic pollutants such as 6PPD-quinone, a chemical contaminant derived from vehicle tires that is suspected to negatively impact aquatic organisms. Ideally, post-project stormwater runoff volume, rate, and duration will match pre-project conditions, and hydro-modification would not occur as a result of the Project. CDFW supports the use of LID strategies because they minimize impacts to aquatic habitats by filtering out pollutants, decreasing peak flows, minimizing erosion, and increasing ground water recharge.

Lake and Streambed Alteration Agreement

An intermittent tributary to Boulder Creek and another ephemeral stream exist on the Project parcel and may be indirectly impacted by Project construction and operation. 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](#)⁴.

³ https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

⁴ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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Submitting Data

CEQA requires that information developed in environmental documents 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 this Project's surveys to CNDDDB. For additional information about submitting data, please see [Submitting Data to the CNDDDB](#)⁵.

Promoting Collaboration

CDFW is dedicated to preserving and protecting California's diverse ecosystems and wildlife. To that end, we maintain a strong commitment to collaborate with our local counterparts. We look forward to continuing our partnership with the Lead Agency to implement comprehensive avoidance, minimization and mitigation strategies that benefit California's sensitive biological resources. We appreciate the collaborative efforts that have taken place thus far and are eager to further align our regulatory frameworks to enhance conservation outcomes. CDFW staff are available to attend site visits and begin early consultation for CESA-related impacts.

Environmental Document Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

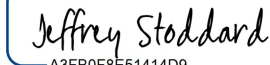
Conclusion

CDFW staff appreciate the opportunity to comment and assist the Lead Agency in identifying potentially significant Project impacts on biological resources. If you have any questions, please contact Helen Bowman, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

⁵ <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

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Sincerely,

DocuSigned by:

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