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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

November 25, 2025

Elisabeth Towers
Shasta County Resource Management
Associate Planner
1855 Placer Street Suite 103
Redding, CA 96001
scplanning@shastacounty.gov

Subject: Review of Use Permit 24-0004, Shasta County, State Clearinghouse Number 2025110373

Dear Elisabeth Towers:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (MND), dated November 2025, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines[1].

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

[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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California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or 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 Project is a proposed Use Permit to construct, operate, and maintain an unmanned commercial wireless telecommunications facility within a 50-foot by 50-foot ground lease area on a parcel developed with a single-family residence and associated residential accessory structures. The lease area would be graded, enclosed by an 8-foot-tall chain-link fence and would be lit by seven L.E.D. service lights. Proposed improvements within the lease area include a 129-foot-tall monopine tower with three ground-mounted equipment cabinets, and an enclosed 30-kilowatt (kW) back-up diesel generator with a 210-gallon fuel tank, a utility transformer and other ancillary equipment.

Project activities proposed outside the lease area include underground utilities, including an approximately 68-foot long unground fiber optic and utility line to an existing Pacific Gas and Electric utility pole near the lease area and an approximately 235-foot underground fiber optic run from existing PG&E power pole to a new point of connection on an existing fiber optic cable that runs along State Highway 299 East, an approximately 296-foot long all-weather gravel access driveway within a 15-foot-wide access and utility easement, including replacement of an existing bridge crossing over perennial creek that flows in a southerly direction and drains into Hatchet Creek.

Comments and Recommendations

In June 2025 CDFW responded to an early scoping solicitation from Shasta County (Lead Agency). CDFW offers the following comments and recommendations to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources.

<u>Western Bumble Bee</u>

On September 20, 2022, the California Fish and Game Commission reinstated the candidacy status for the Western bumble bee (*Bombus occidentalis*; WBB) under CESA, re-advancing the species to the candidacy stage of the CESA listing process. Candidate species are granted full protection under CESA during this period. Take of any endangered, threatened, or candidate species

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that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

The ISMND indicates the Project area may provide potentially suitable habitat for WBB but an official WBB habitat assessment was not included. The ISMND proposes Mitigation Measure (MM) IV.a.3-A, which conditions constructing Project activities between December 1 and January 31 to avoid queen flight season, colony active period and gyne flight season. CDFW staff understand performing work for WBB between December and January may appear to ensure greatest probability of impact minimization; however, this condition may not fully avoid the potential for take. Overwintering queens are more sensitive to changes in their environment, including fluctuations in temperature, availability of floral resources, exposure to pesticides and/or pathogens, and habitat disturbances. Generally, identifying an avoidance window for bumble bees is extremely challenging and would vary annually depending on weather patterns. Therefore, it is not feasible to condition a specific avoidance window without first gathering the results from a comprehensive bumble bee survey.

To more adequately avoid the potential for significant impacts on WBB, CDFW recommends revising MM IV.a.3 to include the language as it is written below:

"The Project proponent shall implement the following mitigation measures to avoid significant impacts to special-status bumble bees:

Prior to issuance of a grading or building permit, a qualified biologist shall conduct a biological assessment to determine whether suitable habitat is present within the Project area. If suitable habitat is determined to be present, a qualified biologist shall conduct surveys for special status bumble bees prior to the start of construction, following CDFW's June 2023 Survey Considerations for CESA Candidate Bumble Bee Species[2], which indicates three onsite surveys shall be conducted two to four weeks apart during peak flight season, weather depending, and when floral resources are present.

i. Species identification and photographic vouchers shall be submitted to CDFW and experts from the Bumble Bee Watch for species verification by an experienced taxonomist prior to the start of land modification and/or vegetation removal.

[2] https://wildlife.ca.gov/Conservation/Survey-Protocols

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ii. If special-status bumble bees are detected, a nesting survey as the protocol is described in CDFW's June 2023 Survey Considerations for CESA Candidate Bumble Bee Species, shall be performed throughout the project area.
iii. If special-status bumble bees and/or their nests are detected, the potential for "take" as defined by Fish and Game Code section 86 shall be analyzed and quantified. If suitable avoidance and minimization measures to fully avoid take are not feasible, CDFW shall be consulted regarding the need for take authorization pursuant to Fish and Game Code section 2081(b). Otherwise, suitable avoidance and minimization measures to fully avoid take should be employed, and/or the formulation of a Mitigation and Monitoring Plan should be developed for impacts to suitable western bumble bee habitat.
iv. All data, including negative and/or positive observations, shall be submitted to the CNDDB and Bumble Bee Watch."

Maintenance

The MND references "infrequent maintenance visits" several times, however, does not list and/or discuss the activities to be performed during these visits. CDFW recommends including a discussion of maintenance activities and an assessment of their potential to impact biological resources in the final MND.

If maintenance activities include land disturbance and/or vegetation removal, all conditional measures listed in the Mitigation Monitoring Program would apply throughout the life of the Project to avoid and minimize impacts to potentially occurring sensitive biological resources. Additionally, if maintenance activities include the use of pesticides to control emergent vegetation and/or weeds, CDFW recommends including specific methods of herbicide use in the MND to avoid and minimize impacts on potentially occurring pollinators. Such methods may include, but are not limited to, restricting the amount of pesticide use, avoiding broadcast applications, training staff in plant identification to avoid spraying native flowing plants (especially native thistles), and only applying pesticides outside of the known blooming season.

In addition, CDFW recommends the preparation and implementation of an emergent vegetation/weed prevention and control plan. When applying pesticides please consider:

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- Following the best management practices described by the Guidance to Protect Habitat from Pesticide Contamination[3].
- 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[4].
- 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[5], the United States Environmental Protection Agency[6] and the California Department of Pesticide Regulation[7].

California Endangered Species Act

This Project has the potential to impact CESA-listed species. Please be advised that a CESA permit[8] 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 the 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).

[3] https://xerces.org/sites/default/files/2019-10/16-024_01_XercesSoc_Guidance-to-Protect-Habitat-from-Pesticides_web.pdf
[4] https://ipm.ucanr.edu/bee-precaution-pesticide-ratings/
[5] https://xerces.org/publications/fact-sheets/smarter-pest-management-protecting-pollinators-at-home
[6] https://www.epa.gov/pollinator-protection/epa-actions-protect-pollinators
[7] https://www.cdpr.ca.gov/docs/enforce/pollinators/
[8] https://wildlife.ca.gov/Conservation/CESA/Permitting

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Lake and Streambed Alteration Agreement

The MND indicates Project activities and improvements will bisect a perennial stream and a hydrologically connected wetland feature. Please note that these actions may be subject to Fish and Game Code section 1602, which 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.

Lake and Streambed Alteration Program staff are available to assist and can be contacted at r1lsaredding@wildlife.ca.gov. To obtain information about the 1602 Notification process, please access the Lake and Streambed Alteration Program[9].

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 observation of special status species to the CNDDB. Use this link to access the CNNDB field survey form[10] and this link for additional information on the type of information reported to CNDDB[11].

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 local government entities. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization for the benefit of California's sensitive resources and aligning regulatory frameworks and appreciates the collaboration thus far.

[9] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA
[10] https://nrm.dfg.ca.gov/fieldSurvey/default.aspx
[11] https://wildlife.ca.gov/Data/CNDDB/Submitting-Data

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Conclusion

CDFW appreciates the opportunity to comment on the MND to assist the Lead Agency in identifying and mitigating Project impacts on 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:
Tina Bartlett
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Tina Bartlett, Regional Manager
Northern Region

ec: Erika Iacona, California Department of Fish and Wildlife
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