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
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January 15, 2026

Stuart Davis
Shasta County Resource Management
Associate Engineer
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SUBJECT: REVIEW OF PARKVILLE ROAD AT ASH CREEK BRIDGE (NO. 06-0220) REPLACEMENT PROJECT, SHASTA COUNTY, STATE CLEARINGHOUSE NUMBER 2025120652

Dear Stuart Davis:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (MND), dated December 2025, for the above-referenced project (Project) posted for public comment on December 18th, 2025. 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

[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.

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 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, as described in the MND, is as follows:

Shasta County, in cooperation with the California Department of Transportation, proposes to replace the existing Parkville Road bridge with a new bridge, including construction of new roadway approaches. The proposed bridge would be a single-span, 102-foot-long by 27.5-foot-wide, reinforced concrete cast-in-place post-tensioned box girder. The new bridge would be installed on a new alignment south of the existing bridge. The roadway approaches would increase in width from 16 to 22 feet to align with the new bridge. Approximately 300 feet of approach road work on each side of the bridge would be required to tie into the existing alignment.

Biological Setting
The Project is located along Ash Creek, a perennial tributary to the Sacramento River in south-central Shasta County within the northern Sacramento Valley. The regional landscape is characterized by a mosaic of valley foothill oak woodland, annual grassland, riparian/riverine habitats, and agricultural lands dominated by grazing and dryland grain crops. Ash Creek flows west through the Project area and enters the Sacramento River approximately 0.6 miles downstream of the Parkville Road bridge crossing.

The hydrology of Ash Creek is supported by seasonal precipitation, shallow groundwater, and spring-fed sources originating in the Cascade foothills[2,3]. Flow regimes exhibit flashy hydrographs during winter and spring storm events, with moderate baseflow persisting through summer and early fall in shaded reaches[2,3]. The channel has defined bed and banks with substrates consisting of cobble, gravel, and sand.

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[2] California Department of Water Resources. (2018). Bulletin 118 – Northern California Hydrology. Retrieved from https://water.ca.gov/Programs/Groundwater-Management/Bulletin-118
[3] U.S. Geological Survey. (2023). StreamStats – Sacramento River Basin. Retrieved from https://streamstats.usgs.gov

Riparian vegetation along Ash Creek includes white alder (*Alnus rhombifolia*), Fremont cottonwood (*Populus fremontii*), and arroyo willow (*Salix lasiolepis*), with an understory of Himalayan blackberry (*Rubus armeniacus*), California wild grape (*Vitis californica*), and poison oak (*Toxicodendron diversilobum*). Adjacent uplands support valley oak (*Quercus lobata*) and blue oak (*Quercus douglasii*) woodland interspersed with annual grassland.

The riparian corridor and adjacent uplands provide habitat for tree-roosting bats, migratory birds and small mammals including but not limited to Osprey (*Pandion haliaetus*, Species of Special Concern [SSC]), Bald Eagle (*Haliaeetus leucocephalus*, CESA Endangered and Fully Protected [FP]]) and northern California ringtail (*Bassariscus astutus rapto*, FP). Ash Creek supports aquatic habitat suitable for Northwestern pond turtle (*Actinemys marmorata*, SSC) and likely to provide seasonal or migratory habitat for anadromous salmonids, including steelhead trout (*Oncorhynchus mykiss irideus*) and Chinook salmon (*Oncorhynchus tshawytscha*). Runs potentially supported include Central Valley fall/late fall-run (SSC), Central Valley spring-run ESU (CESA threatened), and Sacramento River winter-run (CESA endangered). These species may utilize Ash Creek for non-natal rearing or migration during high-flow periods.

Comments and Recommendations

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.

Bats

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Construction activities, including ground disturbance, vegetation removal, bridge demolition and activities leading to increased noise levels, may have direct and/or indirect impacts on bats and bat roosts. Trees that contain cavities, crevices, or exfoliated bark have high potential to be used by various bat species.

The MND acknowledges potential impacts to bats; however, Mitigation Measure (MM) 14 focuses primarily on maternity roosts and does not address potential impacts to individual roosting bats and/or overwintering bats that may be utilizing the bridge structure. MM 14 proposes installing exclusionary

netting over the existing bridge between August 15 and March 1 to prevent maternity colonies from forming and conducting pre-construction surveys for maternity roots in riparian vegetation. While this timing avoids the primary maternity season, exclusionary netting poses a significant risk to bats that may use the bridge for overwintering or day roosting. Bat species identified in the MND including Townsend's big-eared bat (*Corynorhinus townsendii*, SSC) and pallid bat (*Antrozous pallidus*, SSC) are known as year-round occupants of structures, including bridges. Improper netting can lead to entanglement or mortality if bats attempt to exit after installation.

Townsend's big-eared bats typically hibernate in caves, mines, and occasionally man-made structures such as bridges during winter months, preferring cool, stable temperatures (40–55°F) and high humidity[4,5]. Pallid bats generally do not undergo prolonged hibernation; they remain active in mild climates and use roosts in rock crevices, buildings, and bridges year-round, entering short periods of torpor during cold spells[6,7]. Bridges and culverts are documented roost sites for multiple bat species, including these two, especially where crevices provide shelter from wind and predators[8,9].

Since both species have the potential to use bridges outside the maternity season, installing netting could result in trapping or harming overwintering bats. Best practices for bat exclusion, as recommended by the U.S. Fish and Wildlife Service and Bat Conservation International, favor one-way exclusion devices rather than filling or netting without an exit. These devices allow bats to leave the roost but prevent re-entry, eliminating the risk of entanglement. Additionally, a survey performed by a qualified bat biologist should confirm the presence/absence of overwintering bats, not just maternity roosts, before any exclusion measures are implemented. Entry points should only be sealed after all bats have been confirmed to vacate the structure.

CDFW recommends revising MM 14 to include the following:

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[4] Pierson, E.D., Rainey, W.E., & Corben, C.J. (2001). Distribution and status of the Townsend's big-eared bat (*Corynorhinus townsendii*) in California. California Department of Fish and Game.
[5] NatureServe Explorer. *Corynorhinus townsendii* species account. Available at: https://explorer.natureserve.org
[6] Hermanson, J.W., & O'Shea, T.J. (1983). Antrozous pallidus. Mammalian Species, 213:1–8.
[7] Western Bat Working Group. Species Profile: Pallid Bat. Available at: https://wbwg.org
[8] Keeley, B.W., & Tuttle, M.D. (1999). Bats in American bridges. Bat Conservation International.
[9] California Department of Transportation (Caltrans). Bat Habitat Assessment Guidelines. Available at: https://dot.ca.gov

- Replace exclusionary netting with one-way exclusion devices and plastic sheeting, installed only after a qualified bat biologist conducts a pre-exclusion survey confirming the status of bat presence and/or potentially suitable habitat.
- If bats are observed using the bridge as an overwintering or maternity roost, incorporate similar/same bat-friendly design features into the new bridge structure (e.g., roosting ledges, crevices, bat boxes). If such design integration is infeasible, install bat roosting structures in suitable locations near the Project site to offset the loss of roosting habitat.
- If plastic sheeting is infeasible and netting is used, it should be checked a minimum of once per day to ensure no animals are ensnared.

These revisions reduce the risk of harm to bats, and works towards avoiding, minimization and mitigating potentially significant impacts to a less-than-significant level under CEQA.

Maintenance

The MND references maintenance during construction activities and does not list and/or discuss the long-term maintenance activities to be performed for the lifetime of the bridge structure. 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 bridge structure disturbance, 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.

California Endangered Species Act

This Project has the potential to impact CESA-listed fish species. Please be advised that a CESA permit[10] 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

[10] https://wildlife.ca.gov/Conservation/CESA/Permitting

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).

Lake and Streambed Alteration Agreement

The MND indicates Project activities and improvements will bisect Ash Creek. 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[11].

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[12] and this link for additional information on the type of information reported to CNDDB[13].

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

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

minimization for the benefit of California's sensitive resources and aligning regulatory frameworks and appreciates the collaboration thus far.

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:
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