



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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April 17, 2026

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**SUBJECT: REVIEW OF SHASTA COLLEGE FACILITIES MASTER PLAN AMENDMENT
TWO PROJECT, SHASTA COUNTY, STATE CLEARINGHOUSE NUMBER 2026030860**

Dear Theresa Markword:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Initial Study and Mitigated Negative Declaration (MND), dated March 6, 2026, for the above-referenced project (Project) posted for public comment on March 19, 2026. 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

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. 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 Shasta College Facilities Master Plan Amendment Two proposes improvements within three areas of the 337-acre main campus to expand public safety training facilities and provide future student housing. In Study Area 1, the College would construct a 6-story Fire Training Tower, a training structure, roadway extensions, and associated support facilities. Study Area 2 involves removal of the existing ground-mounted solar array and development of a comprehensive Emergency Vehicle Operator Course, a 16,800-square-foot Apparatus Building, multiple concrete training pads, classroom and support buildings, an expanded stormwater basin, and a new paved access road to Shasta College Drive. Study Area 3, evaluated at a programmatic level, would construct two three-story student housing buildings totaling approximately 90 units for 178 students, along with circulation, utilities, and outdoor use areas. The Project includes grading, utility extensions, roadway improvements, and removal of oak woodland and other vegetation necessary to accommodate the proposed facilities.

Biological Setting

The MND describes the Project area as containing primarily interior live oak woodland, which forms a dominant and continuous canopy across portions of all three Study Areas and includes associated species such as blue oak, valley oak, and gray pine. Beneath the canopy, the understory is generally sparse, with patches of annual grasses and forbs occurring in more open areas. The document also identifies three small seasonal wetlands totaling approximately 0.023 acre and several constructed drainage ditches within the project-level study areas, while Study Area 3 contains two seasonal and intermittent stream features that convey flows toward Old Oregon Trail. Although regional databases identify occurrences of special-status species within five miles of the site, the MND reports that no special-status plants or wildlife species were observed during focused field surveys, though the mature tree canopy does provide potential bat roosting habitat and suitable nesting habitat for migratory birds. Portions of the Project footprint also include previously disturbed areas associated with existing training facilities, a solar array field,

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access roads, and stormwater infrastructure.

Comments and Recommendations

CDFW recognizes that the Project applicant has taken some appropriate steps to identify and assess biological resources and special status species that have the potential to occur within or in proximity to the Project area. 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. Editorial comments or other suggestions may also be included to improve the document for this Project.

Crotch's Bumble Bee

On September 30, 2022, the California Fish and Game Commission reinstated the candidacy of Crotch's bumble bee (*Bombus crotchii*, CBB) under CESA, re-advancing these species to the candidacy stage of the CESA listing process. Candidate species are granted full protection under CESA and CDFW considers impacts to species that are candidates for CESA listing to be significant under CEQA. Take of any endangered, threatened, or candidate species 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).

According to the California Natural Diversity Database (CNDDDB) Biogeographic Information and Observation System, the Project area occurs within the currently known range for CBB. CBB's are generalist foragers and have been reported visiting a wide variety of flowering plants². Based on habitat and vegetation description in the MND and review of the property on Google Earth, it appears that suitable habitat for CBB is present. However, focused surveys for CBB were not conducted as part of the MND nor were any measures for avoidance, minimization, or mitigation offered.

To adequately assess this Project's potentially significant impacts on special status bumble bees, the MND should include an analysis of the Project's impact on floral resources, nesting habitat, and overwintering habitat found onsite. CBB should be considered a threatened, endangered, or rare species under

² Biesmeijer, Jacobus & Roberts, Stuart & Reemer, M. & Ohlemüller, Ralf & Edwards, Mike & Peeters, Theo & Schaffers, A.P. & Potts, Simon & Kleukers, Roy & Thomas, Chris & Settele, Josef & Kunin, William. (2006). Parallel Declines in Pollinators and Insect-Pollinated Plants in Britain and the Netherlands. *Science* (New York, N.Y.). 313. 351-4. 10.1126/science.1127863.

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CEQA pursuant to CEQA Guidelines section 15380. If found on-site, the Project could result in crushing or killing CBB, reduction in sufficient food resources such as nectar and pollen, and/or removal of nesting and overwintering sites. Many bumble bees are threatened with extinction due primarily to reductions in habitat from urbanization, intensive agriculture, and invasive species introductions. If CBB occurs at the Project site, Project activities may result in a substantial reduction in the species' population locally, which may lead to a mandatory finding of significance (CEQA Guidelines, § 15065).

Due to potentially suitable habitat within the Project area and to avoid take of CBB, CDFW recommends the following measures are included in the MND to avoid Project impacts to CBB:

Mitigation Measure (MM) MM-Bio-XX #1: Surveys shall be performed by a qualified entomologist familiar with the species behavior and life history to determine the presence/absence of Crotch's bumble bee within one year prior to vegetation removal and/or grading following CDFW's Survey Considerations for CESA Candidate Bumble Bee Species³. Surveys shall be conducted during flying season when the species is most likely to be detected above ground. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report shall provide the following:

- a) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys.*
- b) Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.*
- c) Map(s) showing the location of nests/colonies.*
- d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and*

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

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abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

MM-Bio-XX #2: Avoidance Plan – If Crotch's bumble bee is detected, qualified biologist shall immediately notify CDFW as further coordination will be required to avoid or mitigate significant impacts. In addition, a Crotch's Bumble Bee Avoidance Plan shall be developed.

At a minimum, the avoidance plan shall identify the location of all nests in or adjacent to the Project site as well as all inactive small mammal burrows and thatched/bunch grasses. If an inactive burrow may be disturbed by Project activities, it shall be resurveyed for Crotch's bumble bee within seven (7) days prior to the scheduled disturbance. A minimum 100- foot no disturbance buffer zone shall be established around nests to reduce the risk of disturbance or accidental take. The qualified biologist shall expand the buffer zone as necessary to prevent disturbance or take. An avoidance plan shall be submitted prior to the issuing of the Project a grading permit.

MM-Bio-XX #3: Incidental Take Permit – If the Project proponent is unable to avoid impacts to Crotch's bumble bee, the Project proponent shall consult with CDFW and obtain appropriate take authorization (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall obtain appropriate take authorization prior to the issuing of a grading permit.

MM-Bio-XX #4: Habitat Replacement – The Project proponent shall provide no less than 1:1 compensatory mitigation for removal or damage of any floral resource associated with Crotch's bumble bee. Floral resources shall be replaced as close to their original location as is feasible. If floral resources cannot be replaced within 200 meters of their original location, floral resources shall be planted in the most centrally available location relative to identified Crotch's bumble bee nests. This location shall be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources shall be maintained in perpetuity and replanted and managed as needed to ensure the habitat is preserved.

Impacts to Oak Woodlands and Functional Success Criteria

The ongoing loss of oak woodlands throughout Shasta County without adequate mitigation is resulting in a cumulative total loss of oak woodlands in

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our region. This impact not only equates to loss of oak habitat, but also cumulatively impacts the numerous and abundant wildlife and botanical resources reliant on this natural community. This habitat provides many important ecosystem functions to our community by providing habitat for wildlife, moderating temperature extremes, reducing soil erosion, and sustaining water quality. According to the U.S. Forest Service, of California's 632 native terrestrial vertebrates, more than 300 species, including at least 120 mammals, 147 birds, and around 60 amphibians and reptiles, utilize oak woodlands for food, cover, and reproduction⁴. Therefore, CDFW concurs with Mitigation Measure BR-8 which states "*Trees removed shall be replaced either in close proximity to the construction activity or at a Tree Mitigation Site identified in the Shasta College Landscape Master Plan or other planning document. The mitigation ratio for all oak species removed shall be a 3:1 ratio, whereas mitigation for all other trees removed shall be at a 1:1 ratio.*"

BR-8 does not include specific success criteria beyond survival, nor does it address the need for re-establishing canopy cover, structural diversity, or species composition comparable to the impacted woodland. To ensure that oak woodland functions are restored, and to align with CEQA's requirement that mitigation be feasible, enforceable, and effective, the measure should be revised to include performance standards.

Success criteria for BR-8 oak woodland mitigation should be based on the specific species composition and structural characteristics of the impacted oak community. Success should not be determined until the mitigation area has been completely irrigation-free for a minimum of 3 years and the ecological metrics have remained stable over that period. Stability means no negative trends in native species richness, diversity, abundance, or cover within each vegetation layer, and no positive trends in invasive or non-native species cover.

The revegetation plan should identify a reference site that represents the same oak woodland alliance and is of equal or better habitat quality. Success criteria should be evaluated against this reference condition to ensure the

⁴ Zack, Steve; Chase, Mary K.; Geupel, Geoffrey R. 2002. The oak woodland bird conservation plan: a strategy for protecting and managing oak woodland habitats and associated birds in California. In: Standiford, Richard B., et al, tech. editor. Proceedings of the Fifth Symposium on Oak Woodlands: Oaks in California's Challenging Landscape. Gen. Tech. Rep. PSW-GTR-184, Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture: 845-846

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mitigation site is progressing toward a self-sustaining oak woodland community consistent with BR8 requirements.

Taxonomic Accuracy for Oak Species

The MND inconsistently assigns scientific names to oak species. On page II-6, valley oak is incorrectly associated with *Quercus kelloggii* (black oak). On page IV-3, valley oak is correctly identified as *Quercus lobata*. Since species-level accuracy is foundational to evaluating oak woodland impacts and designing appropriate mitigation under BR-8, the MND should be revised to ensure consistent and correct oak species identification throughout.

Mitigation Measure Cross-Reference

The MND contains inconsistencies in the numbering and referencing of mitigation measures related to bat protection. Mitigation Measure BR-1 is the correct and definitive mitigation for bats, as shown in the formal mitigation list on pages IV-14 to IV-18. However, in the impact analysis narrative on pages IV-7 to IV-9, the same bat protections are incorrectly referenced as "BR-2," creating a direct conflict with the mitigation summary. Since accurate and consistent mitigation numbering is essential for clarity and compliance. The IS/MND should be revised to ensure that all references to bat protection correctly identify the measure as BR-1, and that no text incorrectly attributes bat protections to BR-2.

Low Impact Development

The Project area is adjacent to suitable habitat for aquatic special status species. CDFW recommends the implementation of Low Impact Development⁵ (LID) strategies to prevent a net-increase in stormwater runoff from new development and parking lots. LID strategies may include permeable pavement, vegetated stormwater bio-swales and retention basins to treat, retain and infiltrate stormwater runoff on-site. 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 the outflow of toxic pollutants such as 6PPD-quinone, a chemical contaminant derived from vehicle tires, suspected to negatively impact aquatic organisms. Ideally, post project stormwater run-off volume, rate and duration will match pre-project conditions and hydro modification would not occur as a result of

⁵ https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

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the Project. CDFW supports the use of LID strategies because they minimize impacts to aquatic habitats by filtering out pollutants, decrease peak flows, minimize erosion, and increase ground water recharge.

California Endangered Species Act

This Project has the potential to impact CESA-listed species. Please be advised that a CESA permit⁶ 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).

Lake and Streambed Alteration Agreements

This Project has the potential to result in substantial impacts to rivers, lakes, or streams. 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.

Lake and Streambed Alteration (LSA) Program staff are available to assist and can be contacted at r1lsaredding@wildlife.ca.gov. To obtain information about the 1602 Notification process, please visit the LSA Program website⁷.

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. (Public Resources Code, § 21003,

⁶ <https://wildlife.ca.gov/Conservation/CESA/Permitting>

⁷ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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subd. (e).) Accordingly, please report any observation of special status species to the CNDDDB using the CNDDDB field survey form^{8,9}.

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.

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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Michael Harris, Acting Regional Manager
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⁸ <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

⁹ <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>