



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



April 30, 2026

Mindie Hilton
Senior Planner
County of Lassen Dept. of Planning and Building Services
707 Nevada Street
Susanville CA, 96130
mhilton@co.lassen.ca.us

SUBJECT: REVIEW OF USE PERMIT #2026 PRITAM, LLC, LASSEN COUNTY, STATE CLEARINGHOUSE NUMBER 2026040668

Dear Mindie Hilton:

The California Department of Fish and Wildlife (CDFW) has reviewed the Informal Consultation Notice for the above-referenced project (Project) posted for public comment on April 14, 2026. CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

Project Description

Pritam, LLC is proposing to construct a fuel station, drive-through restaurant and convenience store on a 7.6-acre undeveloped parcel located at 711-711 Sears Road in Janesville, CA (Project Area).

The Project description should include the whole action as defined in the CEQA Guidelines section 15070 and should include appropriate detailed exhibits disclosing the Project Area including temporary impacted areas such as equipment staging area, spoils areas, adjacent infrastructure development, and access and haul roads if applicable.

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 §

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.

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 2

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 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.

California Endangered Species Act (CESA)

Please be advised that a CESA permit² 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 (LSA) Agreements

Imagery indicates stream flow through the Project Area. 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

² <https://wildlife.ca.gov/Conservation/CESA/Permitting>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 3

- 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.

Work within perennial and ephemeral streams and watercourses with a subsurface flow, is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through horizontal directional drilling or trenching, is also generally subject to notification requirements. Therefore, impacts to the mainstems, tributaries, associated riparian habitat, and hydrologically connected floodplains caused by the proposed Project may require an LSA notification.

CDFW, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. 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 website³.

Nesting Birds

CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Biological Setting

This undeveloped parcel in Lassen County appears characteristic of the region's high-desert shrub-steppe habitat, likely dominated by sagebrush, bitterbrush, and scattered juniper.

According to the California Natural Diversity Database (CNDDDB), the Project

³ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 4

Area occurs within the range of several special-status species including, but not limited to:

- Burrowing owl (*Athene cunicularia*, CESA Candidate)
- Swainson's hawk (*Buteo swainsoni*, CESA Threatened)
- Greater-sage grouse (*Centrocercus urophasianus*, CESA Candidate)
- Tricolored blackbird (*Agelaius tricolor*, CESA Threatened)
- Bank swallow (*Riparia riparia*, CESA Threatened)
- Greater sandhill crane (*Antigone canadensis tabida*, CESA Threatened)
- Western bumble bee (*Bombus occidentalis*, CESA Candidate)
- Santa Lucia dwarf rush (*Juncus luciensis*, CRPR 1B.2)
- Pluma ivesia (*Ivesia sericoleuca*, CRPR 1B.2)
- Winged dock (*Rumex venosus*, CRPR 2B.3)
- Adobe lomatium (*Lomatium roseanum*, CRPR 1B.2)

Comments and Recommendations

CDFW offers the comments and recommendations presented below to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the Project with respect to impacts on biological resources. CDFW recommends that the forthcoming environmental document incorporate the following goals and objectives to better minimize impacts to biological resources:

1. Promote the preservation and restoration of continuous areas of natural habitat within the site and support their integration with existing and future preserves;
2. Retain plant and wildlife habitat areas where there are known sensitive resources (e.g., sensitive habitats, special-status, threatened, and endangered, candidate species, and species of special concern (SSC)). Particular attention should be focused on retaining habitat areas that are contiguous with other existing natural areas and/or wildlife movement corridors;
3. Preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive nonnative plants. If not feasible, adverse impacts on riparian habitat should be mitigated by the

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 5

preservation and/or restoration of this habitat in compliance with state and federal regulations in perpetuity;

4. Preserve and protect aquatic and wetland resources including creeks, streams, marshes, ponds, rivers, lakes and other seasonal wetlands to the extent feasible. If not feasible then mitigation measures should be required in coordination with the state and federal regulations to protect fish and wildlife resources. Additionally, the Lead Agency should require either on- or offsite permanent preservation of an equivalent amount of wetland habitat to ensure no net loss of resource value and/or function;
5. Preserve, protect, and avoid impacts to natural, undisturbed habitats that provide movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat should be replaced with habitat of equivalent value or enhanced to enable the continued movement of species;
6. Consider the potential impact on sensitive plants and wildlife from Project activities. Since site conditions are such that potential habitat for sensitive plant and/or wildlife species is present, the Lead Agency should require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either (1) protocol-level surveys should be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey should be conducted consistent with industry recognized best practices; or (2) suitable habitat and presence of the species should be assumed to occur within all potential habitat locations identified on the Project Area. Please refer to CDFW's Survey and Monitoring Protocol Guidelines⁴. Survey Reports should be prepared and submitted to CDFW and/or the United States Fish and Wildlife Service (if applicable) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law;
7. Thoroughly analyze future Project's potential direct, indirect and cumulative impacts on biological resources. To ensure these impacts are

⁴ California Department of Fish and Wildlife. (n.d.). *Survey and monitoring protocols and guidelines*. Retrieved from <https://wildlife.ca.gov/Conservation/Survey-Protocols>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 6

fully analyzed, the Lead Agency should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The Lead Agency should analyze potential direct impacts from altering suitable habitat, increased lighting, noise, human activity, and wildlife-human interactions created by development activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages, as well as analyze potential indirect impacts including resources in areas adjacent to the Project Area, such as nearby public lands, open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands. Additionally, the Lead Agency should analyze the Project's cumulative impacts and determine if that contribution would result in a significant impact;

8. Adopt appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of construction and long-term operation and maintenance of the Project. Mitigation should be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355);
9. Support active habitat restoration and enhancement to reduce impact of climate change stressors and improve overall resilience of habitat within existing open space at the site.

Special-Status Plants

Plants listed pursuant to CESA and the Native Plant Protection Act, as well as other special-status plants such as California Rare Plant Rank (CRPR) may occur within the Project site. Special-status plant species are threatened with habitat loss and habitat fragmentation resulting from development, vehicle and foot traffic, and introduction of non-native plant species, all of which may be impacts of the Project. Therefore, impacts of the Project will potentially have significant and cumulative impacts to populations of the species mentioned above if present within the Project site.

As such, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the *Protocols for Surveying and*

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 7

*Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*⁵. This protocol, which is intended to maximize detectability, includes identification and use of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period and should occur over two survey seasons to reduce climate variability that might affect seasonal bloom. If special-status plants are detected, CDFW recommends they be avoided by delineating and maintaining a no-disturbance buffer from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and/or mitigation measures for impacts to special-status plant species. If a CESA-listed plant species are identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take of that species.

Western Bumble Bee (WBB)

On September 30, 2022, the candidacy of four California bumble bee species was reinstated under the CESA, including WBB, whose range extends adjacent to 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). WBB's 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 subdivided parcels may have the potential to significantly impact local bumble bee populations, therefore, CDFW recommends having a qualified biologist conduct a bumble bee habitat assessment and thorough analysis of potential impacts to bumble bees. 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

⁵ California Department of Fish and Wildlife. (2018, March 20). *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* [PDF]. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 8

health, and vigor of eggs, young, and/or queens, in addition to direct mortality.

Due to this Projects overlap with this species range, CDFW recommends a WBB habitat assessment performed by a qualified biologist. If WBB habitat is found to occur within or adjacent to the Project Area, protocol-level surveys should be performed in accordance with CDFW's *June 2023 Survey Considerations for CESA Candidate Bumble Bee Species*⁶ and results included in the forthcoming environmental document.

Tricolored Blackbird (TRBL)

TRBL are listed as a CESA threatened species. According to CNDDDB, the Project Area is located within 1 mile from TRBL occurrences. Construction activities could result in significant impacts to TRBL through habitat alteration, elevated noise, fugitive dust, human presence, and/or lighting. Noise from road use, generators, and other equipment may disrupt TRBL mating calls or songs which could impact their reproductive success⁷. Bayne et al.⁸ found that songbird abundance and density was significantly reduced in areas with high levels of noise.

Prior to the commencement of Project activities, a qualified biologist should conduct a field assessment to determine if existing or potential nesting or foraging sites are present within the Project Area and adjacent areas within 0.5 miles of the Project Area. The preconstruction assessment should be completed during the breeding season (March 1 through September 15) prior to ground-disturbing activities. Adjacent parcels under different land ownership should be surveyed only if access is granted or if the parcels are visible from authorized areas. Project Proponent shall map all existing or potential nesting or foraging sites and provide these maps to the Lead Agency. Nesting sites, including both currently occupied nesting sites and sites known to have been occupied within the last five years, shall be noted on submitted maps. If suitable nesting or foraging habitat is determined to be present onsite or adjacent to the Project site during the preconstruction assessment, the Project

⁶ California Department of Fish and Wildlife. (2022). *Staff report regarding mitigation for impacts to Swainson's hawk (*Buteo swainsoni*) in the Central Valley* [PDF]. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

⁷ e Blickley, Jessica L. and Patricelli, Gail L.(2010) 'Impacts of Anthropogenic Noise on Wildlife: Research Priorities for the Development of Standards and Mitigation', *Journal of International Wildlife Law & Policy*, 13: 4, 274 — 292

⁸ Bayne EM, Habib L, Boutin S. Impacts of chronic anthropogenic noise from energy-sector activity on abundance of songbirds in the boreal forest. *Conserv Biol*. 2008 Oct;22(5):1186-93. doi: 10.1111/j.1523-1739.2008.00973.x. Epub 2008 Jun 20. PMID: 18616740.

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 9

Proponent should conduct TRBL preconstruction surveys prior to initiating any Project related work.

If nesting habitat is found to be present within or adjacent to the Project Area, a qualified biologist should conduct a preconstruction survey to determine if active nests are present within the Project Area, or within 500 feet of Project-related activity if existing or potential nest sites were found during surveys and Project activities will occur during the breeding season (March 1 through September 15). The qualified biologist shall conduct preconstruction surveys within 30 days of the commencement of Project activities and again within 3 days of ground-disturbing Project activities within the proposed Project Area and within 500 feet of the Project Area to determine the presence of nesting TRBL. The surveys should be separated by at least three weeks. Preconstruction surveys shall be conducted during the breeding season (March 1 through September 15). The surveys shall be based on survey methods identified in the *Results of the 2017 Tricolored Blackbird Statewide Survey, Appendix 1*⁹.

Swainson's Hawk (SWHA)

SWHA are listed as a CESA threatened species and the Project Area is located within 1 mile of known SWHA occurrences on CNDDDB. The primary threat to the SWHA population in California continues to be habitat loss, especially the loss of suitable foraging habitat. Loss of foraging habitat may have been the greatest factor in reducing SWHA range and abundance in California over the last century¹⁰. Suitable foraging habitat is necessary to provide an adequate energy source for breeding SWHA adults, including support of nestlings and fledglings. If prey resources are not sufficient, or if adults must hunt long distances from the nest site, the energetics of the foraging effort may result in reduced nestling health and survival with an increased likelihood of disease and/or starvation. In more extreme cases, the breeding pair, in an effort to assure their own existence, may even abandon the nest and young¹¹.

The Project Area appears to have suitable nesting and/or foraging habitat for SWHA. As a CESA threatened species, SWHA warrants special considerations if indirect and/or direct impacts from the Project are anticipated. Since suitable

⁹ Meese, R. J. (2017). *Results of the 2017 Tricolored Blackbird Statewide Survey*. California Department of Fish and Wildlife, Wildlife Branch, Nongame Wildlife Program Report 2017-04, Sacramento, CA. 27 pp. + appendices.

¹⁰ California Department of Fish and Game (CDFG). 1993. 5-year Status Review: Swainson's hawk (*Buteo swainsoni*). Prepared for the California Fish and Game Commission. Nongame Bird and Mammal Program 1416 Ninth Street, Sacramento, CA

¹¹ Woodbridge, B. 1985. Biology and management of Swainson's hawk in the Butte Valley, California. U.S. Forest Service Report, 19 pp.

Mindie Hilton, Senior Planner
 County of Lassen Dept. of Planning and Building Services
 April 30, 2026
 Page 10

nesting habitat may occur within/adjacent to the Project Area, CDFW recommends that SWHA surveys¹² are conducted by a qualified biologist at the appropriate time of year, prior to implementation of the CEQA document and any Project activities. CDFW recommends compensation for the loss of SWHA foraging habitat as described in the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks*¹³. The report recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites. CDFW has the following recommendations based on the Staff Report:

- For projects within 1 mile of an active nest tree, a minimum of one acre of habitat management (HM) land for each acre of development is advised.
- For projects within 5 miles of an active nest but greater than 1 mile, a minimum of 0.75 acres of HM land for each acre of development is advised.
- For projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree, a minimum of 0.5 acres of HM land for each acre of development is advised

Sandhill Crane (SACR)

SACR is listed as a threatened species under CESA, with breeding concentrated in northeastern California (including Lassen County) and wintering primarily in the Central Valley¹⁴. Suitable breeding habitat includes wet meadows and emergent wetlands with adjacent open foraging areas (e.g., grain fields and short-grass plains). According to CNDDDB, occurrences of SACR are documented within 1 mile of the Project Area.

Prior to commencement of Project activities, a qualified biologist should complete a preconstruction field assessment to determine whether suitable or occupied nesting and foraging habitat occurs within the Project Area and in

¹² California Department of Fish and Wildlife. (2010, June 1). *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties* [PDF]. Retrieve from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83991&inline>

¹³ California Department of Fish and Wildlife. (n.d.). *Staff report regarding mitigation for impacts to Swainson's hawks (Buteo swainsoni) in the Central Valley of California* [PDF]. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83992>

¹⁴ California Department of Fish and Wildlife. (n.d.-a). *Greater Sandhill Crane Range - CWHR B150A [ds3226]*. CDFW Open Data Portal. Retrieved October 27, 2025, from <https://data-cdfw.opendata.arcgis.com/datasets/greater-sandhill-crane-range-cwhr-b150a-ds3226>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 11

adjacent lands that are accessible or visible, using a conservative study buffer (e.g., up to 0.5 mile) given SACR large area requirements and sensitivity to disturbance. Disturbance should be minimized during the core breeding/nesting season (approximately April 15–July 31), with brood-rearing often extending into August–September, and potential sites should be mapped for the Lead Agency, including those occupied within the last five years¹⁵.

If suitable nesting or foraging habitat is present onsite or immediately adjacent, a qualified biologist should conduct preconstruction surveys for SACR following standard CEQA practice for nesting birds, applying no-work buffers of ≥ 500 feet around active nests during the breeding season and expanding buffers where line of sight, noise levels, or lack of visual screening could elevate disturbance; buffer size should be adjusted based on site conditions and agency guidance, with documentation provided to the Lead Agency. In addition to buffers, avoidance/minimization measures should include dust and noise control, restricting work hours to avoid crepuscular periods, shielding or curtailing lighting during migration/staging windows, and maintaining clear project boundaries. Finally, given that water level management and wet meadow integrity strongly influence crane nesting success, any activity affecting hydrology or wetland vegetation within or near suitable habitat should be evaluated and conditioned to maintain shallow water and vegetative cover during incubation and brood rearing.

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:

- 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 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.

¹⁵ California Department of Fish and Game. (1994). *Five-Year Status Review: Greater Sandhill Crane (Grus canadensis tabida)*. Wildlife Management Division, Nongame Bird and Mammal Program. Retrieved from <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3521>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 12

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.

Wetland Delineation

Due to the severe declines of wetlands, CDFW considers impacts to wetlands to be potentially significant and has a "no net loss" policy regarding wetland habitat¹⁶. A delineation of all wetlands, lakes, streams, and any associated riparian habitats (as defined by the State of California) should be performed. A thorough impact analysis should also be included for any potentially affected wetlands, lakes, streams, and riparian habitat found onsite and offsite. The delineation report should include a preliminary jurisdictional delineation, including wetlands identification pursuant to the U. S. Fish and Wildlife Service wetland definition, as adopted by CDFW, and should be

¹⁶ California Fish and Game Commission. (2005, August 18). *Wetlands Resources Policy* [Policy statement]. Retrieved from <https://fgc.ca.gov/About/Policies>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 13

provided for agency and public review. Please note that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers. In addition to "federally protected wetlands" (see CEQA Appendix G (IV)(c)), CDFW considers impacts to any wetlands (as defined by CDFW) as potentially significant.

Low Impact Development

The Project Area is adjacent to suitable habitat for aquatic special status species. CDFW recommends the implementation of Low Impact Development¹⁷ (LID) strategies to prevent a net-increase in stormwater runoff from new developments 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 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.

Lighting

Studies have shown that artificial lighting has adverse effects on wildlife and plant species. The effects may include, but are not limited to, alteration of flowering, photosynthesis, foraging, reproduction, navigation (being attracted to or deterred from), migration patterns (including movement barriers of light) and predator-prey dynamics. To minimize adverse effects of artificial light on wildlife, CDFW recommends that lighting fixtures associated with the Project be downward facing, fully shielded, and designed and installed to minimize light-pollution and spillover of light onto adjacent wildlife habitat. Studies have found that it's best to use lower-intensity, warmer-colored lighting that may

¹⁷ California State Water Resources Control Board. (n.d.). *Low Impact Development – Sustainable storm water management*. Retrieved April 21, 2026, from https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/index.html

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 14

also be lower on the light spectrum (lower Kelvin values with fewer short-wavelength blue light emissions)¹⁸.

Filing Fees

Filing fees are applicable when a Project would have an impact on fish and/or wildlife. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the 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.)

Submitting Environmental 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, subd. (e).) Accordingly, please report any observation of special status species to the CNDDDB using the CNDDDB field survey form^{19,20}.

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. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

AA601B4C4B11422...

Michael Harris, Acting Regional Manager
Northern Region

¹⁸ Kevin J. Gaston, Thomas W. Davies, Sophie L. Nedelec, Lauren A. Holt. 2017. Impacts of Artificial Light at Night on Biological Timings. *Annual Review Ecology, Evolution, and Systematics*. 48:49-68. <https://doi.org/10.1146/annurev-ecolsys-110316-022745>

¹⁹ California Department of Fish and Wildlife. (2016, November). *CNDDDB Online Field Survey Form User Guide*. Retrieved from <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

²⁰ California Department of Fish and Wildlife. (n.d.). *Submitting data to the California Natural Diversity Database (CNDDDB)*. Retrieved from <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

Mindie Hilton, Senior Planner
County of Lassen Dept. of Planning and Building Services
April 30, 2026
Page 15

ec: Robert Sesar, A24 Architects
rob.s@a2rarch.com

State Clearing House
state.clearinghouse@lci.ca.gov

California Department of Fish and Wildlife
R1CEQARedding@wildlife.ca.gov