



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



May 8, 2026

Marco Dominguez
Assistant Planner
Shasta County Department of Resource Management, Planning Division
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SUBJECT: REVIEW OF USE PERMIT 25-0002 (TOWERS OF CALIFORNIA), SHASTA COUNTY, STATE CLEARINGHOUSE NUMBER 2026040483

Dear Marco Dominguez:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Initial Study and Mitigated Negative Declaration (MND), dated April 9, 2026, for the above-referenced project (Project) posted for public comment on April 10, 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.

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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Project Description

The Project as described "is a use permit application to construct, operate, and maintain an unmanned commercial wireless telecommunications facility within a 50-foot by 50-foot ground lease area on an approximately 10-acre parcel that is developed with a single-family residence and associated residential accessory structures. The lease area would be graded, and enclosed by a 6-foot-tall chain-link fence with faux ivy screening. Proposed improvements include a 130-foot-tall monopine tower with three four-sector antenna mounts designed to accommodate up to twelve (12) antennas, and twelve (12) remote radio units (RRU's). Other improvements include one 6-foot microwave antenna, one (1) 30-kilowatt backup generator with a 216-gallon diesel fuel tank on a 3-foot-8-inch by 7-foot-6-inch concrete slab, three (3) ground equipment cabinets, one (1) equipment canopy, and other ancillary equipment. The tower would allow for two (2) future co-location sites for other carriers, and surplus ground lease space would be reserved for future carriers to co-locate at the facility. The lease area would [be] illuminated by three (3) L.E.D. service lights with motion sensor control directed toward the proposed ground equipment. The tower will not be lit.

Improvements proposed outside the lease area include 1,014 feet of trenching for underground utilities, installation of an above ground utility connection to serve the facility, construction of an approximately 874-foot long 12-footwide graveled access driveway with a culvert and a 12-foot wide gate with a Knox Box, and a PG&E transformer. Excavators, backhoes, bulldozers, trenchers, dump trucks, cranes and similar equipment could all be used for site preparation activities and construction. Approximately 0.5 acres of grading, trenching, excavation and backfilling involving approximately 395 cubic yards of cut, 250 cubic yards of fill, will be necessary to install facility structures, ancillary equipment, fencing, utilities (electricity and fiber optic), and to construct the driveway. Construction of the driveway and wireless telecommunications facility requires the removal of approximately sixteen (16) oak trees."

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.

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Editorial comments or other suggestions may also be included to improve the document for this Project.

Oak Woodlands

The ongoing loss of oak woodlands throughout Shasta County without adequate mitigation is resulting in a cumulative total loss of oak woodlands in 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 reproduction². Therefore, CDFW encourages the Lead Agency to consider mitigation for impacts to blue oak woodland (i.e. that removed oak trees be replaced either near the construction activity or at a predetermined tree mitigation site).

Additionally, CDFW encourages the Lead Agency to include performance standards. Success criteria for 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.

Avoiding Inadvertent Wildlife Entrapment

As Project activities include trenching or excavating, CDFW recommends that any open trench or excavation pit be securely covered prior to stopping work each day, and/or that a wildlife exit ramp be installed to prevent wildlife

² 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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entrapment. If pipes are left out onsite, CDFW recommends inspection for wildlife prior to burying, capping, moving, or filling.

Low Impact Development

The Project area is located approximately 60 feet from a pond with an ephemeral outflow that is potentially suitable habitat for aquatic species. CDFW recommends the implementation of Low Impact Development³ (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 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, decreasing peak flows, minimizing erosion, and increasing groundwater recharge.

Lake and Streambed Alteration Agreement

The MND indicates that Project activities include the construction of a culverted road. Please note that 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.

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

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Lake and Streambed Alteration Program staff are available to assist and can be contacted at rlsaredding@wildlife.ca.gov. To obtain information about the 1602 Notification process, please access the [Lake and Streambed Alteration Program](#)⁴.

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, subd. (e).) Accordingly, please report any observation of special status species to the CNDDDB using the CNDDDB field survey form^{5,6}.

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 RICEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Michael Harris, Acting Regional Manager
Northern Region

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

⁵ <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

⁶ <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

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