



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



Governor's Office of Planning & Research

MAR 20 2019

STATE CLEARINGHOUSE

March 20, 2019

Morris Rodrigue
Assistant Superintendent/Vice President of Administrative Services
Shasta-Tehama-Trinity Joint Community College District
P.O. Box 496006
Redding, CA 96049-6006

Subject: Review of the Mitigated Negative Declaration for the Shasta College Facilities Master Plan Amendment, State Clearinghouse Number 2019029051, Shasta County

Dear Mr. Rodrigue:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study/Mitigated Negative Declaration (MND) dated February 8, 2019, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq.

Project Description

The Project as proposed, and as funding becomes available, includes: "*demolition of existing buildings, courtyards and parking lots; buildings proposed for renovation; buildings proposed for new construction; and, future building sites.*" The Project is located on the 337-acre Shasta College Campus bounded by Old Oregon Trail on the west, vacant land to the north, West Stillwater Creek to the east and State Route-299 on the south on Assessor Parcel Number 076-030-008.

According to the MND, the Project supports 70 acres of intact oak woodland, 1.52 acres of seasonal wetlands, and an intermittent stream.

Comments and Recommendations

The Project has identified the square footage of the future buildings proposed for new construction, but no design details have been provided. Impacts to biological

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resources from the construction of these buildings has not been determined but will be provided at a later date. The Department has the following comments and recommendations as they pertain to biological resources.

Mitigation Ratios

Mitigation Measure BR-2

Mitigation Measure BR-2 states, "*Oak woodland habitat shall be replaced at a minimum 1:1 ratio on an acreage basis.*" A 1:1 ratio for replacement of intact oak woodland habitat does not compensate for spatial and temporal loss of habitat and may result in a net loss of oak woodland habitat. Loss of oak woodland should be mitigated at a 2:1 ratio at the very least with ratios possibly increasing for woodland with large diameter trees with higher biological value.

Mitigation Measure BR-4

Mitigation Measure BR-4 states "*If the project may affect regulated waters, Shasta College shall obtain all necessary permits and comply with the permit conditions and shall offset the unavoidable loss of waters at a minimum 1:1 ratio, or as otherwise required in the permits.*"

Wetlands are considered extremely valuable natural resources. To this end, the State policy requires no net loss of these habitats. The Department considers all wetlands sensitive and the State has a "No Net Loss" wetland Policy.¹

According to the Department's Wetland Technical Memorandum², numerous studies have shown that wetland mitigation projects often do not meet their required U.S. Army Corps of Engineers permit conditions. Along with the risk of mitigation underperformance or failure, the temporal loss of wetland function from the time of impact to the time a mitigation site is fully functional is also a factor in potentially diminishing the value of compensatory restored wetlands. Such temporal loss may vary depending on habitat type and other factors. For the above reasons, the Department recommends that mitigation for the loss of wetlands and riparian habitat begin at 3:1 or greater.

¹ Fish and Game Commission Wetlands Resources Policy (Amended 8/18/05)

² <https://wildlife.ca.gov/Search-Results.aspx?q=Wetland%20Technical%20Memorandum>

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Special Status Surveys

All surveys should be conducted prior to approval of the Project and survey results shall be sent to the Department at the following address: Department of Fish and Wildlife, Attn: CEQA, 601 Locust Street, Redding, CA 96001.

Special Status Plant Species

Plant surveys should be conducted following the Department's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (<https://www.wildlife.ca.gov/conservation/survey-protocols#377281280-plants>) or the most current available protocol. If any special-status species are found during surveys, the Department requests that California Natural Diversity Database (CNDDDB) forms be filled out and sent to Sacramento and a copy of the form be sent to the Regional office at the above address. Instructions for providing data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Special Status Wildlife Species

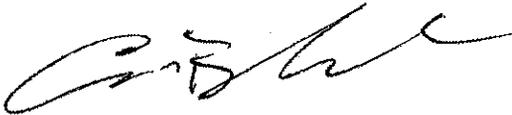
Western Spadefoot Toad (*Spea hammondi*)

Habitat for the western spadefoot toad, a Priority 1 Species of Special Concern, which are taxa that are likely to experience severe future declines and/or extirpation without immediate conservation actions, is present onsite. The Department asserts that this species meets the criteria of a rare, threatened, or endangered species pursuant to CEQA Guidelines section 15380. Therefore, impacts to this species are potentially significant. Surveys for this species by a biologist familiar with its life history have not yet been conducted. This species is known to occur less than 8 miles away and suitable habitat exists onsite for this species. This species does not necessarily breed every year and is dependent upon adequate rainfall – both the timing and duration are important cues for the western spadefoot to come out of dormancy. Both daytime and nighttime surveys are required. The Department recommends proper surveys for this species be conducted by a qualified biologist familiar with this species' life history requirements. If western spadefoot toad is shown to be present, the MND should include avoidance and mitigation measures. For this Project, avoidance and minimization around the seasonal wetlands would be necessary and the 25-foot to 50-foot buffer may not be adequate. Surveys for this species should be conducted prior to the final designs of the Project to prevent construction delays.

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If you have any questions, please contact Amy Henderson, Environmental Scientist, at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,



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