



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



January 29, 2020

Stefano Richichi, Associate Planner
County of Lassen
Department of Planning and Building Services
707 Nevada Street, Suite 5
Susanville, CA 96130

Governor's Office of Planning & Research

JAN 29 2020

STATE CLEARINGHOUSE

Subject: Review of the Early Scoping for Use Permit 2019-011 and Initial Study 2019-007 (Woodcrest Real Estate Ventures), State Clearinghouse Number 2020010121, Community of Doyle, Lassen County

Dear Mr. Richichi:

The California Department of Fish and Wildlife (Department) has reviewed the early consultation request dated January 7, 2020, 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 (CESA) 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 the State's trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq. The following are informal comments intended to assist the Lead Agency in making informed decisions early in the Project development and review process.

Project Description

The Project as proposed is to "construct a 9,100-square-foot retail store off of Old Highway Road near Doyle." The parcels are located at 436-400 and 436-410 Old Highway Road on Assessor's Parcel Numbers 141-060-13 and 141-060-12.

Comments and Recommendations

The Department has the following recommendations and comments as they pertain to biological resources.

Biological Resources

The Department is basing early consultation comments on the information you provided in your request. To enable Department staff to adequately review and comment on the proposed Project, we recommend the following information be included in the subsequent environmental review as applicable. As the Project is proposed in wildlife habitat, a basic botanical, wildlife, and habitat assessment (conducted at the appropriate time of the year) is needed in order to determine whether focused or protocol-level surveys are warranted, and to make an informed decision on potential significant impacts. The Department recommends all plant and wildlife species identified in the California Natural Diversity Database (CNDDDB) and other biological resource databases (U.S. Fish and Wildlife Service, California Native Plant Society, or other pertinent references) be analyzed for the potential to occur within the Project area. The Department cannot determine whether the project would result in significant impacts until more information is provided.

A query of the CNDDDB identified a number of special-status wildlife and botanical species as well as sensitive vegetation within a three-mile radius including, but not limited to, the following:

Plants

- Schoolcraft's wild buckwheat (*Eriogonum microthecum* var. *schoolcraftii*) (California Rare Plant Rank 1B.2)
- Plummer's clover (*Trifolium gymnocarpon* ssp. *plummerae*) (California Rare Plant Rank 2B.3)
- Western seablite (*Suaeda occidentalis*) (California Rare Plant Rank 2B.3)
- Lance-leaved scurf-pea (*Ladegania lanceolata*) (California Rare Plant Rank 2B.3)

Wildlife

- Swainson's hawk (*Buteo swainsoni*) (State Listed as Threatened)

The CNDDDB is a positive sighting database. It does not predict where something may be found. The Department maps occurrences only where we have documentation that the species was found at the site. There are many areas of the state where no surveys have been conducted and therefore there is nothing on the map. That does not mean that there are no special status species present.

The next step is to conduct surveys to document what is actually present today and submit the information on special status species to the Department and CNDDDB. All surveys should be conducted prior to approval of the Project and survey results shall be e-mailed to the Department at the R1CEQARedding@wildlife.ca.gov. A thorough assessment of rare plants and rare natural communities 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>). If any

special-status species are found during surveys, the Department requests that 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>. Swainson hawk protocols can be found at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83991&inline>. The protocol is written for the Antelope Valley area in southern California; however, it works just as well in the northern deserts.

Lighting

The Department recognizes the adverse effects that artificial lighting has on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse effects of artificial light on wildlife, the Department recommends that lighting fixtures associated with the Project be downward facing, fully-shielded and designed and installed to minimize photo-pollution and spillover of light onto adjacent wildlife habitat.

Landscape Plan

The Department recommends the “native” seed mix consist of native seeds from the local area. The Department requests to see a list of species to be used in the wildflower mix. The use of ornamental plants in landscaping does impact the local ecosystems. Research continues to show that native plants support more species of insects than commonly planted landscape plants¹. This becomes an issue when one realizes the number of insects it takes to feed a brood of birds, for example. The Department recommends more natives and fewer ornamental plants be used for this Project.

Mitigation

Avoidance and mitigation measures for impacts to special-status species and sensitive habitats, if found, should be proposed in subsequent environmental review to avoid any significant effects the Project would have on the species or its habitat. Examples of mitigation measures for special-status species and habitat include, but are not limited to, project modification to avoid the species and its habitat, enhancement of existing onsite habitat, offsite restoration or enhancement of habitat, or onsite/offsite preservation of habitat.

¹ Burghardt, Karin et al. “Impact of Native Plants on Bird and Butterfly Biodiversity in Suburban Landscapes.” *Conservation Biology* 23.1 (2009): 219-224. Print.

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The Department appreciates the opportunity to comment during the early consultation period. If you have any questions, please contact Amy Henderson, Senior Environmental Scientist (Specialist), at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Curt Babcock', is written over a light blue horizontal line.

Curt Babcock
Habitat Conservation Program Manager

cc: Stefano Richichi, Associate Planner
County of Lassen
srichichi@co.lassen.ca.us

State Clearinghouse
state.clearinghouse@opr.ca.gov

Amy Henderson
California Department of Fish and Wildlife
Amy.Henderson@wildlife.ca.gov