



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Northern Region  
601 Locust Street  
Redding, CA 96001  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



Governor's Office of Planning & Research

**MAR 24 2020**

March 24, 2020

## STATE CLEARINGHOUSE

Luis Topete, Associate Planner  
Shasta County Department of Resource Management  
1855 Placer Street  
Suite 103  
Redding, California 96001

**Subject: Review of the Mitigated Negative Declaration for Use Permit 2019-0010, State Clearinghouse Number 2020029079, Bella Vista, Shasta County**

Dear Luis Topete:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study/Mitigated Negative Declaration (MND) dated March 21, 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 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 *"is a new unmanned wireless telecommunications facility consisting of a 100-foot tall monopole tower with 9 panel antennas, 18 remote radio units, and two 4-foot diameter microwave dishes, an 8-foot pre-manufactured concrete equipment shelter and associated interior equipment, a 30kW diesel standby generator with an attached 190-gallon fuel tank and other ancillary onsite equipment within a 30-foot by 35-foot lease area enclosed by a 6-foot tall chain link fence with vinyl slats that is accessible via an existing access road."*

### Comments and Recommendations

The Department commented on this Project via electronic mail during early consultation on November 7, 2019. The Department appreciates the incorporation of our comments and has minor changes to the proposed mitigation measures (**in bold**).

*Conserving California's Wildlife Since 1870*

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### Survey Results

All survey results should be provided to the Department for review. Survey results can be sent electronically to [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov) or mailed to California Department of Fish and Wildlife, ATTN: CEQA, 601 Locust Street, Redding, California 96001.

### Nesting Bird Surveys

Mitigation Measure IV.a.4 should say, “*The nesting bird survey shall be conducted within 7 days prior to commencement of ground-disturbing or other development activities.*”

Mitigation Measure IV.a.4(a) should say, “*If development does not commence within 7 days of the nesting bird survey, or halts...*”

### Bat Surveys

The Department concurs with Mitigation Measure IV.a.6 which states,

*“Any vegetation removal or construction on the property should occur between September 1 – October 15 and between March 1 – March 31 to avoid the bat maternity season as well as the winter season when bats are torpor and are inactive...”* **A two-day vegetation removal process should be followed as provided below.**

**Day 1: Remove non-habitat vegetation including shrubs and small diameter trees as well as specific limbs and branches of habitat trees.**

**Day 2: Remove the remaining branches on the habitat tree and then final removal of the main tree trunk.**

This process works best as bats choose their roosts based on thermal properties. When the thermal properties are disturbed, the bats leave to find other trees, snags, rock cracks, crevices, buildings, and/or bridges.

Mitigation Measure IV.a.7 should be changed to provide more clarity:

*“If vegetation removal or construction activities occur during the bat maternity season (April 1 – August 31) or the **hibernacula season** (October 16 – February 28) then a preconstruction bat roost survey shall be conducted by a qualified **bat biologist** within **7** days prior to development or ground disturbing activities including grading, vegetation clearing, tree removal or trimming, or construction. The surrounding 100 feet of the study area shall also be surveyed for roosting bats, where accessible. **Surveys should be conducted by a qualified bat***

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**biologist familiar with bat ecology, habitat requirements and natural history of local bat species as well as knowledge in using standard equipment used in bat research (e.g., bat detector, night vision, and telemetry equipment.)**

- a. **If bats are not observed by the qualified bat biologist, a letter report shall be prepared to document the survey results and provided to the project proponent, County, and the California Department of Fish and Wildlife. If development does not commence within 7 days of the pre-construction survey, or halts for more than 14 days, an additional survey by the qualified bat biologist is required prior to resuming or starting work.**
- b. *If special-status bats are present and roosting in the study area or the surrounding 100 feet of the study area, the qualified bat biologist shall establish an appropriate no disturbance buffer around the roost site prior to the commencement of ground disturbing activities or development. At a minimum, no trees shall be removed or trimmed until the biologist has determined that a roost site is no longer active and no bats are present. Additional mitigation measures for bat species may be recommended if special-status bat species are found to be roosting within the study area.*

Mitigation Measure IV.a.8 should have the following added to it:

*“Prior to commencement of work activities, a qualified bat biologist shall provide a worker environmental awareness training to all project-related personnel.”*

### Trenching

The original documentation shows trenching being used to place the underground conduit. If the trench remains open at the end of the workday, it should be covered securely, or a ramp should be provided in the trench to prevent wildlife entrapment. If pipes are left out, they should be inspected for animals prior to burying, capping, moving or filling.

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](mailto:Amy.Henderson@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Curt Babcock*  
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**Curt Babcock**  
Habitat Conservation Program Manager

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