



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

MAY 01 2020

STATE CLEARINGHOUSE

May 1, 2020

Luis Topete, Associate Planner
Planning Division
Department of Resource Management
1855 Placer Street
Suite 103
Redding, CA 96001

Subject: Review of the Mitigated Negative Declaration for Use Permit 19-0015 (AT&T Mobility), New Cingular Wireless PCS, LLC, State Clearinghouse Number 2020049024, Anderson, Shasta County

Dear Luis Topete:

The California Department of Fish and Wildlife (Department) has reviewed the Mitigated Negative Declaration (MND) dated April 9, 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 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, California Public Resources Code section 21000 et seq. The Department commented on this Project January 21, 2020, during the early consultation period.

Project Description

The Project as proposed is "a use permit application for a new unmanned wireless telecommunications facility consisting of a 40-foot by 40-foot AT&T lease area with ¾-inch crushed stone gravel throughout and enclosed by a 6-foot tall chain link fence with barbed wire and a 12-foot wide access gate, a proposed 130-foot tall monopine, 9 antennas, 15 remote radio units, one future microwave dish, installation of an 8-foot by 8-foot concrete walk-in cabinet and associated interior equipment, a proposed 30KW diesel standby generator with an attached 190 gallon fuel tank mounted on a 5-foot by 10-foot concrete slab and other ancillary onsite equipment." Additional improvements include graveling 20 feet of an existing dirt path beginning near the west end of the property line to the new telecommunications facility, undergrounding approximately 1,630 feet of power lines to an existing power pole onsite, installation of two transformers and other ancillary improvements.

Comments and Recommendations

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

Conserving California's Wildlife Since 1870

Luis Topete, Associate Planner

May 1, 2020

Page 2

Mitigation Measures

Mitigation Measure IV.a.7 discusses vegetation removal and/or construction activities occurring during the bat maternity season or the hibernacula period would need a preconstruction bat roost survey. This survey needs to be conducted by a qualified bat biologist familiar with the life history and ecological requirements of the bat species known to occur in the area. The Department recommends the sentence reads as follows with changes in bold:

*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...*

Mitigation Measure IV.c.1 discusses obtaining permits to impact potential waters of the U.S. and waters of the State, but there was no mention of how those impacts would be mitigated. Mitigation at a minimum ratio of 2:1 for impacts to waters of the State is necessary. Appropriate mitigation could include enhancement of existing onsite habitat, offsite restoration or enhancement of habitat, or onsite/offsite preservation of habitat. The offsite restoration, enhancement or preservation could be mitigated at the Stillwater Plains Mitigation Bank.

Trenching

According to the MND, 1,630 feet of power lines will be undergrounded to an existing power pole onsite. 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 onsite, they should be inspected for animals prior to burying, capping, moving or filling. The MND did not provide a mitigation measure for this potential impact although it was addressed during the early consultation period. The Department recommends a mitigation measure be developed and included in the final MND.

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

Sincerely,

DocuSigned by:

Curt Babcock

Curt Babcock

Habitat Conservation Program Manager

ec: Luis Topete
Department of Resource Management
Ltopete@co.shasta.ca.us

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