



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 13 2020

STATE CLEARINGHOUSE

May 13, 2020

Amber Kelley, Environmental Compliance Manager
City of Redding
Public Works Department
777 Cypress Avenue
Redding, CA 96001

Subject: Review of the Mitigated Negative Declaration for the Eastside Road and Westside Road Bridge Replacement Project, State Clearinghouse Number 2020049034, Anderson, Shasta County

Dear Amber Kelley:

The California Department of Fish and Wildlife (Department) has reviewed the Mitigated Negative Declaration (MND) dated April 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.

Project Description

The Project as proposed is to replace the Eastside Road Bridge (Bridge No. 06C0085) and the Westside Road Bridge (Bridge No. 06C0071) over Canyon Hollow Creek. The existing Eastside Road Bridge will be replaced with a new two-lane, two-span cast-in-place reinforced concrete slab bridge. The existing Westside Road Bridge will be replaced with a new two-lane, three-span cast-in-place reinforced concrete slab bridge. In addition to replacing the bridges, work will also include extending the sidewalk along some approaches, storm drain modification, paving, striping, and sign installation. PG&E gas lines, City of Redding water lines, and AT&T underground phone and fiber optic lines will require relocation with trench excavation depths up to 12 feet deep. Two staging areas will be used, the first within a disturbed dirt area located at the northeast quadrant of the Eastside Road Bridge and the second in a paved section of abandoned roadway located 130-feet north of the Westside Road Bridge.

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Comments and Recommendations

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

Bats

The Natural Environment Study dated January 2020 and prepared by Dokken Engineering, states that no western red bats (*Lasiurus blossevillii*) were observed during the site visit on November 30, 2017, and there was no habitat for other special status bat species present onsite. A focused bat survey was not conducted.

Mitigation Measure MM-5 states that bat surveys will be conducted within seven days prior to the start of Project activity if large trees will be removed during the bat maternity season. It goes on to state if the species is discovered during pre-construction surveys, the City will contact the Department to develop avoidance and minimization measures. There is no discussion about surveying the bridge structures.

Bridges are well documented as providing important maternity and hibernacula roost habitat. According to Caltrans' *Bat and Bridges Technical Bulletin*, 93 percent of California's rare bat species either use or are likely to use bridges, and 18 of California's 24 bat species are documented as using bridges¹.

In addition to protecting bats as discussed in MM-5, both the maternity and hibernacula season must be considered. Removal or disturbance of a roost structure during either of these seasons could cause significant impacts to bats as a colony could consist of the entire local population of a species and impacts may lead to high mortality. The availability of suitable roosting habitat is considered a limiting factor for western bat populations. Roost site suitability is often based on a narrow range of suitable temperatures, relative humidity, physical dimensions, etc., and many species exhibit high roost site fidelity.

In order to minimize impacts to roosting bats, the Department recommends the completion of habitat assessments of impacted bridges and large trees to determine if roosting habitat is present well in advance of the start of Project activities. These assessments should be conducted by a biologist with experience surveying for bat roost habitat and knowledge of the ecology of local bat species. Different species may require different mitigation strategies and factors beyond the roost type, such as the rarity of the species and the sensitivity of the species to disturbance, must be considered.

Presence of roosting bats may require additional focused surveys to determine species use, seasonal use patterns, and roost type. Habitat assessments conducted prior to the start of Project activities will allow for time to determine potential impacts to roosting

¹Erickson, G.A., et al. 2002. Bat and Bridges Technical Bulletin (Hitchhiker Guide to Bat Roosts). California Department of Transportation, Sacramento, CA.

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bats and develop effective avoidance or mitigation measures and will also reduce the chance for Project delays.

Permitting and Mitigation

The MND states that the project applicant will obtain a 1602 Lake or Streambed Alteration Agreement along with other necessary permits. The MND also states that riparian vegetation will be replanted at a 3:1 ratio. The Department concurs with this mitigation ratio for impacts to riparian vegetation. A revegetation plan should be developed and include success criteria and a list of native plants proposed to be used. The revegetation plan should be reviewed and approved by the Department.

Trenching

According to the MND, trenching to a depth of 12 feet will be required to relocate PG&E gas lines, City of Redding water lines, and AT&T underground phone and fiber optic lines. 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 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
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Curt Babcock

Habitat Conservation Program Manager

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