



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**



March 30, 2023

David Schlegel, Senior Planner  
Shasta County  
1855 Placer Street, Suite 103  
Redding, CA 96001  
(530) 225-5532  
[dschlegel@co.shasta.ca.us](mailto:dschlegel@co.shasta.ca.us)

**SUBJECT: REVIEW OF ZONE AMENAGEMENT 13-007 HIGH PLAINS SHOOTING  
SPORTS CENTER PROJECT, STATE CLEARINGHOUSE NUMBER  
2023030114, SHASTA COUNTY**

Dear Davis Schlegel:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND) dated March 2023, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines<sup>1</sup>.

### **CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, "take" authorization, as outlined by the applicable Fish and Game code, may be required if the Project as proposed may result in "take", as defined by state law, of any species

---

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Davis Schlegel  
March 30, 2023  
Page 2

protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and G. Code § 1900 et seq.). authorization as provided by the applicable Fish and Game Code will be required.

## **Project Description**

The Project, as described in the ISMND, is as follows:

*“The request is to change the zoning of the project site from the Limited-Residential combined with Mobile Home and Building Site 40-Acre Minimum Lot Area (R-L-T-BA-40) zone district to the Commercial Recreation (C-R) zone district and adopt a conceptual development plan for an outdoor gun range complex and gun club, including long-rifle firing lines and handgun bays with berms to serve as backstops, clay target trap and skeet shooting ranges, a 4,975-square-foot primary clubhouse with a 3,272-square-foot attached covered patio area and a 1,025-square-foot attached caretaker’s residence, and a 699-square-foot law enforcement clubhouse with a 270-square-foot attached covered patio. Power for the facility would be provided primarily by roof-mounted solar arrays with diesel generators housed in generator buildings to augment energy needs. The two clubhouses and the caretaker’s residence would be served with on-site wastewater treatment systems, and potable water and fire suppression water from an on-site well(s). The range would be open 5 days a week from 8:00 a.m. until dark but in no case later than 8:00 p.m. Large events would be held intermittently with the largest event attracting up to 500 people. Other shooting sports events would typically attract between 30 and 200 people. Large shooting sports events would be held intermittently and may include RV overnight dry camping in a designated parking area. Onsite activity would be managed for environmental quality and safety. Certain long-range rifle targets would only be in use for events and all ranges would be managed by a Range Officer for safety during operation. The site would also be managed to prevent the spread of wildfire based on weather conditions by closing during red flag warning days and maintaining fuels and vegetation in accordance with recommendations and requirements for defensible space. Debris, including bullet shells, fragment, and casings, clay targets, etc., would be regularly collected and properly disposed.”*

## **Comments and Recommendations**

CDFW recognizes that Shasta County has taken the appropriate steps to identify and assess potential impacts to biological resources. CDFW offers the following comments and recommendations as they pertain to biological resources.

### Nesting Birds

Vegetation throughout the riparian corridor of Bear Creek, oak trees and grasslands throughout the property all serve as potentially suitable habitat for nesting birds. CDFW concurs with IV.a.1, as detailed in the ISMND, which

Davis Schlegel  
March 30, 2023  
Page 3

proposes to implement vegetation removal and other ground disturbing activities outside of the nesting bird season, or with the implementation of pre-construction surveys. However, Section XIII of the ISMND indicates the Project would generate a permanent substantial increase in ambient noise levels. While the implementation of IV.a.1 may avoid and/or minimize impacts from initial Project construction, the ISMND does not offer an assessment or avoidance and minimization measures for potential impacts to nesting birds due to a substantial increase in ambient noise levels throughout the life of the Project.

Elevated noise levels are known to alter nesting behavior, which may lead to nest abandonment, therefore, CDFW strongly encourages a nesting bird assessment of the perceived permanent elevated noise regime that is typical of shooting centers. The assessment and proposed avoidance and minimization measures may be similar to those included in Section XIII, but should consider nesting bird habitats found onsite, such as the Bear Creek riparian corridor.

#### Vernal Pool Species

The Project area occurs within Millville Plains, known for its vernal pool complexes, which are protected under state and federal laws. The ISMND indicates 11.75-acres of vernal swales, and 0.428 acres of vernal pool habitat occur within the Project site. The ISMND acknowledges that these habitats could support up to 20 different species and the Project has been re-oriented in such a way to “*entirely avoid nearly all designated wetland features*”. CDFW concurs with the re-orientation of Project scope to avoid these sensitive habitats and associated species however, the ISMND does not indicate consultation with the United States Fish and Wildlife Service (USFWS). Due to the proximity of Project activities to vernal pools, and potential presence of federally listed species such as vernal pool fairy shrimp (*Branchinecta lynchi*), CDFW recommends consulting with the USFWS.

#### Cattle Grazing

The ISMND indicates cattle grazing will continue throughout the subject parcel and perimeter fencing was indicated around the shooting center on the Project site plans. CDFW understands fences are essential for controlling livestock and trespass, however, inappropriately designed or placed fencing may create serious hazards and/or barriers for wildlife. Therefore, CDFW strongly encourages perimeter and livestock fencing to be designed and implemented to alleviate potential hazards to wildlife. This resource may provide useful information about wildlife friendly fencing techniques: A Landowners Guide to Wildlife Friendly Fences: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161708>

The ISMND states “*Vernal swales and other vernal features can be impacted by cattle through trampling and over-grazing. The project would propose to graze cattle only on an as-needed basis to keep for wildland fuel as well as evasive plant management.*”. To alleviate the degradation of sensitive habitats and water quality

Davis Schlegel  
March 30, 2023  
Page 4

within the Sacramento River Watershed, and to avoid deleterious material deposits to state waters, responsible livestock grazing practices are recommended, including:

- Livestock should be excluded from Bear Creek and its associated riparian habitat by using livestock-resistant/wildlife-friendly fencing techniques.
- Livestock alternative drinking water sources should be located away from any surface waters.

For information about responsible grazing practices, some resources are provided:

- The Grazing Handbook:  
<https://carangeland.org/images/GrazingHandbook.pdf>
- State Waterboard's Grazing Management Measures and Practices:  
[https://www.waterboards.ca.gov/water\\_issues/programs/nps/encyclopedia/1\\_e\\_graz.html](https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/1_e_graz.html)

#### Lake and Streambed Alteration Agreement

While the ISMND indicates "*nearly all*" aquatic resources found onsite will be avoided, Project activities such as culvert installation and pedestrian bridge installation within intermittent and ephemeral drainages qualify for Notification under Fish and Game Code Section 1602. Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

1. substantially divert or obstruct the natural flow of the bed, channel, or bank of any river, stream, or lake; or
2. substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or
3. deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

To obtain information about the 1600 Notification process, please access CDFW's website at: <https://www.wildlife.ca.gov/Conservation/LSA>

The Environmental Management Plan and biological resource documents, including the biological review and aquatic delineation report, should be attached to the Notification application, as they are mentioned several times in the ISMND, but are not included in the attachments.

#### Trenching, Excavation and Pipe Staging

If trenching and excavation will be included in Project activities, any open trench and excavation areas should be covered securely prior to stopping work each day and/or a wildlife exit ramp should be provided in the trench to prevent wildlife entrapment. If pipes are left out onsite, they should be inspected for wildlife prior to burying, capping, moving, or filling.

Davis Schlegel  
March 30, 2023  
Page 5

### Native Vegetation in Landscaping

Revegetation of backstops and planted vegetation along perimeter fencing were indicated in site plans. CDFW recommends utilizing vegetation native to the local area in landscaping whenever possible. Benefits of utilizing native vegetation in landscaping include providing resources for native wildlife such as hummingbirds and beneficial pollinators, conserving water, reducing pesticide use, and reducing landscaping maintenance. The California Native Plant Society (CNPS) website (<https://www.cnps.org>) includes a variety of useful information and tools to help determine which native species occur in a particular area, information on care and maintenance of native species, and contacts for purchasing native plants or seeds. The CNPS tool Calscape (<https://calscape.org/>) generates a list of native plants that grow in an area based on a specific address, and can be used to develop a planting palette for landscaping plans. For more information regarding the importance of using native species in landscaping, please see the CNPS Guidelines for Landscaping to Protect Native Vegetation from Genetic Degradation at: <https://www.cnps.org/wpcontent/uploads/2018/04/landscaping.pdf>.

CDFW appreciates the opportunity to offer comments and recommendations that may assist Shasta County in adequately analyzing and minimizing impacts to biological resources. If you have any questions, please contact Erika Iacona, Environmental Scientist, by email at [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Robert Hawkins*  
F8D52F774C764C2...

Robert Hawkins for  
Tina Bartlett, Regional Manager  
Northern Region

cc: State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Erika Iacona  
[R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov)