



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**



January 17, 2024

Governor's Office of Planning & Research

**Jan 17 2024**

**STATE CLEARINGHOUSE**

Kelly Mumper  
City Planner  
City of Susanville  
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Susanville, CA 96130  
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**SUBJECT: CITY OF SUSANVILLE GENERAL PLAN LAND USE ELEMENT AND CIRCULATION ELEMENT UPDATE, STATE CLEARINGHOUSE NUMBER 2023120232, LASSEN COUNTY**

Dear Kelly Mumper,

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Susanville's (City) Draft Initial Study and Negative Declaration (ISND), for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines.

#### **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 and G. Code, §§ 711.7, subd. (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its Trustee Agency 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 is also submitting comments as a Responsible Agency under CEQA (Public 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, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species

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protected under the California Endangered Species Act (CESA) (Fish and 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 ISND, is as follows:

*"The Susanville General Plan details the community's long-term vision and policy framework enabling the city to develop according to its stated goals. This plan identifies the way the city is intending to grow, where it should (and should not) develop, requirements for improvements to public infrastructure, and provisions needed to protect and strengthen the unique community character that has defined Susanville since its inception.*

*The adoption of the Updated General Plan Land Use and Circulation Elements requires that the Susanville City Council approve and adopt the Initial Study/Negative Declaration through a public hearing with proper notification. The Susanville General Plan is intended to establish the policy framework for future growth and redevelopment of the City over the next 20 years. The plan's focus is on preserving the rural agriculture character of the community. The preservation of the open space within and surrounding the city is of significant concern to the community.*

*The proposed project consists of an update to the City of Susanville General Plan. The project includes updates to the Land use and Circulation elements. Both the Safety and Housing Elements were updated and approved separately. They have been incorporated into this General Plan update for the purpose of maintaining consistency."*

### **Comments and Recommendations**

CDFW provides the following comments to further assist the Lead Agency in adequately identifying, avoiding and/or minimizing potentially significant impacts to biological resources.

The update to the Land Use Element and Circulation Element of the City's General Plan will not, in and of itself, result in impacts to biological resources however, such updates include the facilitation of future land modification, maintenance activities, and development. CDFW supports the development and implementation of avoidance, minimization, and mitigation measures to address future impacts to biological resources, as the ISND describes in Section 4, Biological Resources.

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Section 4 of the ISND does not identify the numerous special status species that have the potential to occur in the Project area. Susanville is in a region that features diverse ecosystems including coniferous forests, wetlands, geothermal features, volcanic landscapes, saline lakes, and high desert habitats. Susanville is situated within the confluence of the Sierra Nevada, Cascade Range, and the Great Basin, which influences the area's mosaic of habitats and abundant biodiversity. Such ecological diversity supports various state special status species adapted to these unique environments including, but not limited to, golden eagle (*Aquila chrysaetos*, State Fully Protected), scalloped moonwort (*Botrychium crenulatum*, California Rare Plant Rank 2B.2), greater sandhill crane (*Grus canadensis tabida*, State Threatened) and sub-herds of the Doyle migratory mule deer herd.

### **Reduction of Human and Wildlife Conflict**

CDFW supports the intent of the City's Land Use Element in preserving the rural agriculture character of the community and the preservation of the open space within and surrounding the City. Agricultural lands and open space areas provide valuable habitat and migration corridors for wildlife species. Maintaining and establishing these open space areas within, and adjacent to, urban centers such as Susanville, results in humans living with wild animals as our neighbors. As our human population expands into wildlife habitat, human-wildlife interactions have increased. Conflict between humans and wildlife is a growing concern in developing areas, especially where the conflict results in livestock losses and property damage, the spread of wildlife diseases, and animal welfare issues and/or mortality of native wildlife including mountain lion, black bear, and mule deer. For more information about preventing potential conflict for a variety of wildlife species, please visit [Human-Wildlife Conflict](#).

As the City considers the development of policies and ordinances to support the vision of the General Plan and its associated elements, CDFW suggests the City consider the following recommendations to reduce occurrences of human and wildlife conflict:

#### Wildlife Friendly Fencing

CDFW understands fences are essential for controlling livestock and trespassing however, inappropriately designed or installed fencing may create serious hazards and/or barriers for wildlife. Therefore, CDFW strongly encourages the City to consider a policy that includes perimeter fencing, and residential fencing to be constructed with wildlife friendly fencing techniques, to reduce the potential of injury or death and provide safe connections and corridors between the habitats that wildlife species use during daily and annual movements. Please consult [A Landowner's Guide to Wildlife Friendly Fences](#):

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[How to Build Fence with Wildlife in Mind](#) for construction recommendations and use of wildlife friendly fencing. CDFW staff are also available to assist in providing further recommendations for effective wildlife friendly fencing techniques and the locations where they should be used.

#### Watering and Feeding Ungulates

California is home to many native ungulate species, including elk, mule deer, and pronghorn. They may be found in diverse habitats throughout the state that may include remote, rural, and residential areas. These animals may live in resident or migratory herds.

Watering and feeding ungulates can have negative consequences for both the species population and the surrounding ecosystem. Providing food may lead to habituated animals, dependency on human-provided food sources, overcrowding, and has been known to lead to disease transmission among herds. CDFW recommends the City develop local policies and enforceable codes aimed at preventing watering and feeding of ungulates and allowing for the construction of deer exclusion fencing in appropriate locations as part of an updated General Plan. CDFW staff are available to assist the City in installing exclusionary fencing where it would be most effective. For more information, please visit [Human-Wildlife Conflicts: Ungulates](#).

#### Human-Wildlife Conflict with Black Bears

Black bears provide many ecosystem benefits by serving as seed dispersers, scavengers, and predators. They are omnivores and will consume nearly anything, including seeds, plants, berries, other animals, pet food, human food, and trash. Improperly stored garbage, bird feeders, fruit trees and accessible pet food can attract bears which is likely to result in bears becoming habituated to and losing their fear of humans. This change in bear behavior can lead to an increase in bear encounters, property damage, loss of small livestock or pets. CDFW recommends the City develop policies and enforceable codes aimed at preventing bear and human conflict as part of current or future General Plan updates. For more information about preventing potential conflicts with black bears, please visit [Human-Wildlife Conflicts: Black Bears](#).

#### **Development and Conservation**

LUD-1.9 of the Land Use Element mentions maintaining and designating an adequate amount of open space and recreational land uses to meet the needs of residents and visitors. CDFW encourages the preservation of open space and natural areas within City limits. CDFW recommends the Lead Agency consider regional and state-wide natural resource conservation

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strategies outlined in the following reports: [Safeguarding California Plan](#); [California State Wildlife Action Plan: A Conservation Legacy for Californians](#); and [California 2030 Natural and Working Lands Climate Change Implementation Plan](#). CDFW staff are available to assist the City in identifying appropriate conservation strategies that support the implementation of General Plan policies and those that may result in improved conservation outcomes for fish and wildlife species.


### **Future CEQA Consultation**

CDFW would like to emphasize that our staff are available for consultation at every stage of the project development process. CDFW strongly encourages the Lead Agency to consult with CDFW before and during the development of future projects and those equivalent CEQA documents, specifically regarding the analyses of biological resources and the formulation of avoidance, minimization, and mitigation measures for such resources. Engaging with CDFW early-on plays a critical role in allowing our agency to fulfill our mandate to conserve California's valuable fish and wildlife resources and will simultaneously aid the Lead Agency in an efficient and comprehensive CEQA review.

### **Conclusion**

CDFW appreciates the opportunity to comment on the Project to assist the Lead Agency in adequately analyzing and minimizing impacts to biological resources and looks forward to reviewing the future City of Susanville General Plan update. If you have any questions regarding the information above, or for future CEQA consultation requests, please contact Erika Iacona, Senior Environmental Scientist, by email at [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Tina Bartlett, Regional Manager  
Northern Region

cc: State Clearinghouse  
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Erika Iacona  
California Department of Fish and Wildlife