



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



May 5, 2025

Sandra Duchi
City Clerk
City of Weed
550 Main Street
Weed, CA 96094
Sandra.duchi@ci.weed.ca.org

**SUBJECT: REVIEW OF BASECAMP MOUNT SHASTA, CITY OF WEED, STATE CLEARING
HOUSE NUMBER 2025040222**

Dear Sandra Duchi:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND), dated April 3, 2025, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

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 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 (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, to the extent implementation of the Project as proposed may result in "take" as defined by state law, of any species protected under the

¹ 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.

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

Project Description:

The Project, as described in the ISMND, is proposing to construct a 156-acre campground spanning two parcels. The project includes 36 off-grid sites, 34 sites with water and electricity, 12 sites with full hookup, 12 prefabricated model cabins and 1 park model unit for a Manager's Residence. Additional structures include a main lodge, 4 bathhouses, a recreation pavilion, hot tub, sauna, and EV charging stations. Infrastructure improvements would include access roads, extension of water, sewer, electrical connections and bioswales. The Project area primarily consists of dry mixed conifer dominated by ponderosa pine with some fir and western juniper.

Comments and Recommendations

Tree Removal

This project will remove up to 450 trees for infrastructure and development of the campground and associated buildings. A timber harvest plan (THP) and timber conversion plan (TCP) will be obtained for the Project. Requirements related to tree removal will be addressed during the THP and TCP process involving CalFire and CDFW Timberland Conservation Program. The Biological Report and ISMND did not include a replanting plan. Although replacing trees in the same locations is not feasible, native trees should be planted within other areas of the parcel. CDFW recommends that a replanting plan be developed.

Bumble Bee

On June 12, 2019, the California Fish and Game Commission accepted a petition to list Crotch's bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*) and western bubble bee (*Bombus occidentalis occidentalis*) as endangered under CESA, advancing the species to the candidacy stage of the CESA listing process. Candidate species are granted full protection under CESA during this period. Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9).

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This Project bisects the western bumble bee, Suckley cuckoo bumble bee and Franklin's bumble bee historic distribution range and has potentially suitable nesting, foraging and overwintering habitat. The Biological Report and ISMND did not include a habitat assessment or protocol level survey results for CESA-listed bumble bees. Without appropriate assessment and AMMs, direct mortality and potentially significant indirect impacts associated with ground and vegetation-disturbing activities may occur as a result of Project activities. Due to potentially suitable habitat throughout the Project site and the potential for significant impacts to bumble bees with the implementation of this Project, protocol level surveys should be performed by a qualified biologist in accordance with [June 2023 Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#)². For further clarification, Section 4 on Page 3 recommends at least 3 surveys, spaced 2-4 weeks apart during the colony active period, located in Table 1.

Please note, conducting protocol-level surveys for CESA-listed species before finalizing an environmental document is important to ensure an accurate environmental assessment is performed, avoid inadequate mitigation decisions, and accurately comply with CESA regulatory requirements. Surveys will help to identify species presence, preventing potentially costly Project modifications, delays, or the need for CESA permitting. Conducting these surveys prior to Project approval supports a comprehensive approval process and minimizes the likelihood of potentially costly Project revisions. Therefore, CDFW strongly recommends performing bumble bee surveys prior to Project approval.

Protection of Nesting Birds

The Project area contains suitable habitat for nesting birds. The ISMND offers MM-BIO-1 and MM-BIO-5 for the protection of nesting birds; however, the measure is not written to prioritize avoidance and is not adequate in the protection of nesting birds. Please revise the nesting season from February 1st to August 31st and preconstruction surveys to be conducted within 7 days prior to the start of construction. To adequately avoid impacts to nesting birds protected under Fish and Game Code sections 3503 and 3503.5 and the federal Migratory Bird Treaty Act, please include the following AMMs in the ISMND.

- a) Vegetation removal and other ground-disturbing activities should occur between September 1 and January 31, when birds are not anticipated to be nesting.

² <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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- b) If vegetation removal or ground disturbing activities occur during the nesting season, a pre-construction nesting bird survey should be conducted by a qualified biologist to identify active nests in and adjacent to the Project area.

Surveys should begin prior to sunrise and continue until vegetation and nests have been sufficiently observed. The survey should consider acoustic impacts and line of sight Project disturbances to determine a sufficient survey radius to maximize observations of nesting birds. A nesting bird survey report should be prepared and, at a minimum, the report should include a description of the area surveyed, date and time of the survey, ambient conditions, bird species observed, a description of any active nests observed, any evidence of breeding behaviors (e.g., courtship, carrying nest materials or food, etc.), and a description of any outstanding conditions that may have impacted the survey results (e.g., weather conditions, excess noise, presence of predators).

If an active nest is located during pre-construction surveys, a non-disturbance buffer should be established around the nest by a qualified biologist in consultation with CDFW and U.S. Fish and Wildlife Service to comply with Fish and Game Code sections 3503 and 3503.5 and the Migratory Bird Treaty Act. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists.

Nesting bird surveys should be conducted **no more than one week** prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction nesting bird survey, the site should be resurveyed.

Lighting

Studies have shown that artificial lighting has adverse effects on wildlife and plant species. The effects may include, but are not limited to, alteration of flowering, photosynthesis, foraging, reproduction, navigation (being attracted to or deterred from), migration patterns (including movement barriers of light) and predator-prey dynamics. To minimize adverse effects of artificial light on wildlife, CDFW recommends that lighting fixtures associated with the Project be downward facing, fully shielded, and designed and installed to minimize light-pollution and spillover of light onto adjacent wildlife habitat. Studies have found that it's best to use lower-intensity, warmer-colored lighting that may also

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be lower on the light spectrum (lower Kelvin values with fewer short-wavelength blue light emissions) (Gaston et al., 2017)³.

Native Vegetation in Landscaping

The ISMND does not include landscape plans. This project will remove up to 450 trees for infrastructure and development of the campground and associated buildings. A THP and TCP will be obtained for the Project but does not discuss revegetation.

If the Lead Agency conditions landscaping for this Project, CDFW recommends using only vegetation native to the local area. Benefits of utilizing native vegetation in landscaping are numerous and include providing vital resources for native beneficial pollinators, conserving water, reducing pesticide use, and reducing landscaping maintenance. The California Native Plant Society (CNPS) website 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/)⁴ 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 refer to the CNPS Guidelines for Landscaping to Protect Native Vegetation from Genetic Degradation.

California Endangered Species Act

This Project has the potential to impact CESA-listed species, including bumble bees. Please be advised that a [CESA permit](https://wildlife.ca.gov/Conservation/CESA/Permitting)⁵ must be obtained if the Project has the potential to result in “take” (hunt, pursue, catch, capture, kill, or attempt thereof) of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project has the potential to result in the take of a CESA-listed species, early consultation is encouraged, as significant modification to the Project may be necessary to minimize and fully mitigate impacts as required by Fish and Game Code, section 2081 (b)(2).

³ Kevin J Gaston, Thomas Davies, Sophie Nedelec and Lauren Holt. (2017) Impacts of Artificial Light at Night on Biological Timings Annual Review of Ecology, Evolution, and Systematics. 48. 49-68.

10.1146/annurev-ecolsys-110316-022745. <https://doi.org/10.1093/icb/icab145>

⁴ <https://calscape.org/>

⁵ <https://wildlife.ca.gov/Conservation/CESA/Permitting>

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Submitting Data

CEQA requires that information developed in environmental documents is incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any observation of special status species to the California Natural Diversity Database (CNDDDB). Use this link to access the [CNNDDB field survey form](#)⁶ and this link for additional information on the type of [information reported to CNDDDB](#)⁷. Additionally, a copy of the form should be sent to the Northern Region office at R1CEQARedding@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the ISMND to assist the Lead Agency in identifying and mitigating Project impacts on biological resources. If you have any questions, please contact Stephanie Houtman, Environmental Scientist by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region

cc: Clayton Snyder
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State Clearing House
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⁶ <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

⁷ <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>