



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**



May 7, 2020

Governor's Office of Planning & Research

**MAY 07 2020**

**STATE CLEARINGHOUSE**

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

**Subject: Review of the Mitigative Negative Declaration for Parcel Map 18-001 (Greenview Development Company), State Clearinghouse Number 2020049023, Assessor Parcel Number 203-16-19, Redding, Shasta County**

Dear Luis Topete:

The California Department of Fish and Wildlife (Department) has reviewed the Mitigative Negative Declaration for Parcel Map 18-001 dated April 8, 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 (CEQA), California Public Resources Code section 21000 et seq.

### **Project Description**

The Project as proposed is to *"Subdivide 50.17 acres into 2 residential parcels of 9.35 and 4.4 acres and a 36.42-acre remainder. Should the parcel map be approved, the remainder parcel will be annexed into the City of Redding by pending LAFCO annexation proposal (Application #AN1-04). The remainder is proposed to facilitate the development of the Campo Calle Area – Westridge."*

The City of Redding submitted a Tentative Subdivision Map for the remainder portion of Parcel Map 18-001 on August 31, 2018. The remainder portion is proposed to have 28 lots, three of which are open space parcels.

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## Comments and Recommendations

The Department commented on Parcel Map 18-001 on February 27, 2020, during the early consultation period.

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

### Biological Surveys

As discussed in our previous comment letter, biological surveys for this area were previously conducted over 14 years ago and will need to be updated prior to any new construction. A basic biological assessment would include botanical, wildlife, and habitat surveys (conducted at the appropriate time of the year) to determine whether focused or protocol-level surveys are warranted. The Department recommends all plant and wildlife species identified in the California Natural Diversity Database (CNDDDB) and other biological resource databases (U.S. Fish and Wildlife Service, California Native Plant Society, or other pertinent references) be analyzed for the potential to occur within the Project area.

The CNDDDB is a positive sighting database. It does not predict where something may be found. The Department maps occurrences only where we have documentation that the species was found at the site. There are many areas of the State where no surveys have been conducted and therefore there is nothing on the map. That does not mean that there are no special status species present. The next step is to conduct surveys to document what is actually present today and submit the information on special status species to the Department and CNDDDB. All surveys should be conducted prior to approval of the Project and survey results shall be e-mailed to the Department at the [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).

The following should be included in the biological assessment:

1. Date/time/weather conditions during the survey(s).
2. A description of the natural environment.
3. A list of common and special status plant and wildlife species as well as habitats present onsite at the time of the survey(s).
4. Rare/local/unusual species and habitats present during the survey(s).
5. A thorough assessment of rare plants and sensitive natural communities should be conducted following the Department's March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>)
6. If habitat is present for special status plants or wildlife, focused

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species-specific surveys should be conducted at the appropriate time of year and/or time of day when the species are active or otherwise identifiable. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service. Links to some survey procedures are provided on the Department's website (<https://wildlife.ca.gov/Conservation>). All surveys should be conducted prior to approval of the Project and survey results provided in the subsequent environmental document.

7. If any special-status species are found during surveys, the Department requests that CNDDDB forms be filled out online and submitted. Instructions for providing data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.
8. Impacts to and maintenance of wildlife corridor/movement areas and other key seasonal use areas should be fully evaluated and provided.
9. A discussion of impacts associated with increased lighting, noise, human activity, impacts of free-roaming domestic animals including dogs and cats, changes in drainage patterns, changes in water volume, velocity, quantity, and quality, soil erosion, and/or sedimentation in streams and watercourses on or near the Project site.
10. As shown in the Project application, this Project is surrounded by a high fire severity zone. A discussion on fuels management, and how it would affect biological resources, should be analyzed.
11. Mitigation measures for adverse Project-related impacts to sensitive plants, wildlife, and habitats should be developed and thoroughly discussed. Mitigation measures should first emphasize avoidance and reduction of Project impacts. For unavoidable impacts, the feasibility of on-site habitat restoration or enhancement should be discussed. If on-site mitigation is not feasible, off-site mitigation through habitat creation, enhancement, acquisition and preservation in perpetuity should be addressed.
12. If the Project site has the potential to support aquatic, riparian, or wetland habitat, a delineation of lakes, streams, and associated riparian habitats potentially affected by the Project should be provided for agency and public review. This report should include a preliminary jurisdictional delineation including wetlands identification pursuant to the U. S. Fish and Wildlife Service wetland definition as adopted by the Department. Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers. The jurisdictional delineation should also include mapping of ephemeral, intermittent, and perennial stream courses potentially impacted by the Project. In addition to "federally protected wetlands" (see CEQA Appendix G (IV)(c)), the Department considers impacts to any wetlands (as defined by the Department) as potentially significant.

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The Department recommends a mitigation measure be developed that prior to obtaining a building and/or grading permit, and prior to any vegetation removal, a biological assessment be conducted to update previously collected biological data.

#### Wetland Delineation

A wetland delineation was conducted on a portion of the site on July 14, 19 and 20, 2016. The U.S. Army Corps of Engineers verified the delineation in a letter dated October 3, 2017 (Parcel Map 18-001 dated March 26, 2018 - notes). Wetland delineations are typically good for two years but no longer than five even if there have been no substantial changes. The wetland delineation may need to be updated if the drainages will be impacted by construction.

#### Wetland and Stream Setbacks

Three unnamed intermittent drainages traverse Parcel 1. The Department recommended a 50-foot setback from the drainages be created beginning at the top of bank or edge of riparian dripline, whichever is greater in their February 27, 2020, letter. The Department appreciates that the buffer will be delineated on all intermittent and ephemeral creeks and will be designated as a non-building, non-disturbance area for parcels 1 and 2 on the recorded map.

As pointed out in our previous comments, the westernmost drainage of Parcel 1 shows a sewage disposal area mapped adjacent to the drainage. The Department requested a more detailed discussion of this disposal area in relation to potential housing sites on Parcel 1, but it has not been provided. The Department recommends a minimum 50-foot setback from the drainage and sewage disposal site.

#### Notification of Lake and Streambed Alteration

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which includes associated riparian resources) of a river or stream, or use material from a streambed, the Department will require a Lake and Streambed Alteration (LSA) Notification, pursuant to section 1600 et seq. of the Fish and Game Code, from the applicant. Project activities, which would be subject to LSA Notification requirements, include construction of stormwater features that discharge on or over the streambank and modification of associated riparian resources growing on the bank. Issuance of an LSA Agreement is subject to CEQA. The Department, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. To obtain information about the LSA notification process, please

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access our website at <https://www.wildlife.ca.gov/Conservation/LSA> or to request a notification package, contact the Lake and Streambed Alteration Program at (530) 225-2367 or [R1LSARedding@wildlife.ca.gov](mailto:R1LSARedding@wildlife.ca.gov).

If you have any questions, please contact Adam McKannay, Senior Environmental Scientist (Supervisor) at (530) 225-2124, or by e-mail at [Adam.McKannay@wildlife.ca.gov](mailto:Adam.McKannay@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Curt Babcock*  
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**Curt Babcock**  
Habitat Conservation Program Manager

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