



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

Aug 05 2020

STATE CLEARINGHOUSE

August 5, 2020

Linda Burke, Senior Planner
City of Redding
Development Services Department
777 Cypress Avenue
Redding, CA 96001

Subject: Review of the Initial Study/Mitigated Negative Declaration for Site Development Permit SDP-2020-00255, State Clearinghouse Number 2020079014, City of Redding, Shasta County

Dear Linda Burke:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study/Mitigated Negative Declaration (MND) dated June 2020, and received by the Department on July 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.

The Department commented on this Project on April 3, 2020, via electronic mail.

Project Description

The Project as proposed is the "construction of a self-storage mini warehouse project consisting of 74,400 square feet of storage in twelve buildings with a manager's office to be located on vacant property addressed as 5525 Airport Road and zoned "GI" General Industry District. The project includes the off-site extension of Aviation Drive and storm drain facilities in the public right-of-way south of the project site."

Comments and Recommendations

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

Mitigation Measures

Mitigation Measure BIO-1 incorrectly states the nesting period for migratory birds and raptors as February 1 through August 15. The nesting season for migratory birds and raptors should be written as February 1 through August 31. The Department recommends the following:

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To avoid impacts to nesting birds and/or raptors protected under Fish and Game Code sections 3503 and 3503.5, one of the following shall be implemented:

- a) Conduct vegetation removal and other ground-disturbance activities associated with construction from September 1 through January 31, when birds are not nesting; or
- b) Conduct pre-construction surveys for nesting birds if vegetation removal or ground disturbing activities are to take place during the nesting season (February 1 through August 31). These surveys shall be conducted by a qualified biologist no more than one week prior to vegetation removal or construction activities during the nesting season. If an active nest is located during the preconstruction surveys, a non-disturbance buffer shall be established around the nest by a qualified biologist in consultation with the Department. No vegetation removal or construction activities shall occur within this non-disturbance buffer until the young have fledged, as determined through additional monitoring by the qualified biologist. The results of the pre-construction surveys shall be sent electronically to the Department at R1CEQARedding@wildlife.ca.gov or by mail to CDFW, Attn: CEQA, 601 Locust Street, Redding, CA 96001.

Mitigation Measure BIO-2 should be rewritten to include both the hibernacula and maternity season for bats. A bat mitigation measure was previously provided, and the Department is providing it again below. It is important to note that if the Project applicant would like to avoid hiring a qualified bat biologist, it would be best to remove the large trees outside the bat maternity season and before winter torpor (hibernacula), which would be September 1 through October 1.

To avoid impacts to bat species, the following should be implemented:

1. If vegetation removal occurs during the bat maternity season (March 1 – August 31) or during hibernacula (October 16 – February 28), a qualified bat biologist shall assess the large habitat trees for cavities, crevices, and snags. If a maternity colony or hibernacula is located with the Project area, a disturbance free buffer shall be established by the qualified bat biologist, in consultation with the Department, to ensure the colony/roost is protected from Project activities. No trees shall be removed or trimmed until the bat biologist has determined that a roost site is no longer active, and no bats are present. Additional mitigation measures for bat species may be recommended if special status species are found to be roosting within the study area.
2. If no maternity colonies or hibernacula are observed by the qualified bat biologist, a two-day vegetation removal process should be followed as provided below:
 - a. Day 1: Identify potential habitat trees and remove non-habitat vegetation including shrubs and small diameter trees as well as specific small limbs and branches of the habitat trees. This changes the microclimate of the area.
 - b. Day 2: Remove the remaining large tree branches on the habitat tree and then remove the main tree trunk.

No additional mitigation measures were provided in the MND, however, the Biological Constraints letter by Gallaway Enterprises, dated August 27, 2019, recommended the preparation of a Tree Protection Plan for any oak trees greater than 6 inches diameter at breast

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height, and for the City to determine additional mitigation requirements for the loss of the oaks per the City of Redding's *Trees & Construction, A Guide to Preservation*. The Department concurs a mitigation measure for the loss of oaks would be necessary to mitigate impacts associated with tree removal.

California Natural Diversity Database

If special status species are observed, the Department would appreciate the observation be put into the California Natural Diversity Database. Instructions for providing data to the CNDDDB can be found at: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

If you have any questions, please contact Amy Henderson, Senior Environmental Scientist (Specialist), at (530) 598-7194, 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

cc: Linda Burke, Senior Planner
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