



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

June 29, 2021

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STATE CLEARINGHOUSE

Christian Martinusen, Assistant Planner
 City of Redding
 Development Services Department
 777 Cypress Avenue
 Redding, CA 96001

SUBJECT: REVIEW OF MITIGATED NEGATIVE DECLARATION FOR SITE DEVELOPMENT PERMIT SDP-2020-01714 (CHRISTIAN CHURCH HOMES), PIPER WAY SENIOR HOUSING, STATE CLEARINGHOUSE NUMBER 2021050638, ASSESSOR'S PARCEL NUMBER 104-680-003, REDDING, SHASTA COUNTY

Dear Christian Martinusen:

The California Department of Fish and Wildlife (Department) has reviewed the Mitigated Negative Declaration (MND) dated May 28, 2021, 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, California Public Resources Code §21000 et seq.

Project Description

The Project as proposed is "*Construction of a new affordable senior housing project including 59-units and one manager's unit administrative support offices, common facilities, and 32 parking spaces.*" The Project would permanently impact a total of 0.042 acre of waters of the United States.

Comments and Recommendations

The Department commented on this Project on May 19, 2021, during the early consultation period. The Department has the following comments and recommendations as they pertain to biological resources:

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Oak Woodland

As previously stated in our early consultation comments, oak woodland habitat continues to be removed without any effective mitigation measures, resulting in a continuous regional loss of oak woodlands. The MND states 15 blue oaks will be retained. Mitigation at a minimum of 3:1 should be developed for impacts to the blue oaks proposed for removal. This ratio would include both permanent and temporal loss of the oak woodland habitat. Impacts to oak woodland could be mitigated in one of two ways: (1) credits at a 3:1 ratio could be purchased at Stillwater Plains Mitigation Bank or (2) acquisition of a parcel with blue oak woodland habitat that contains three acres of preserved oak woodland habitat for every one acre of oak habitat removed.

Bats

Mitigation measure MM-3 should be changed to include potential impacts to bat hibernacula as stated in our previous comments. MM-3 should read (changes in bold), *“To the extent practicable, removal of large trees with cavities, crevices, or snags shall occur before bat maternity colonies form (i.e., prior to March 1) or after young are volant (i.e., after August 31). If construction (including the removal of large trees ≥ 12 inch dbh) occurs during the bat non-volant season (March 1 through August 31) or during the bat hibernacula (November 1 – March 1), a qualified professional shall conduct a pre-construction survey of the study area to locate maternity and/or roosting colonies and identify measures to protect colonies from disturbance. The preconstruction survey will be performed no more than 7 days prior to the implementation of construction activities. If a maternity colony is located within or adjacent to the study area, a disturbance free buffer shall be established by a qualified professional, in consultation with CDFW, to ensure the colony is protected from project activities. If pre-construction surveys occur during bat hibernacula, the trees should be removed in a humane fashion using a two-day process to prevent accidental death of bats. The two-day tree removal process includes removing the non-habitat trees and brush along with certain tree limbs on the first day and the remainder of the tree on the second day.”*

Wetland Mitigation

Mitigation measures for impacts to Waters of the United States should include purchasing credits at the Stillwater Plains Mitigation Bank at a 2:1 ratio.

If you have any questions, please contact Amy Henderson, Senior Environmental Scientist, at (530) 598-7194, or by email at Amy.Henderson@wildlife.ca.gov.

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Sincerely,

DocuSigned by:
Brad Henderson
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Curt Babcock
Habitat Conservation Program Manager

cc: Christian Martinusen, Assistant Planner
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