



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



June 17, 2022

Governor's Office of Planning & Research

Lily Toy, Planning Manager
Development Services Department
City of Redding
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Jun 17 2022

STATE CLEARINGHOUSE

SUBJECT: Review of the Notice of Preparation for the City of Redding General Plan Update 2023 Environmental Impact Report (EIR), State Clearinghouse Number 2022050300, City of Redding, Shasta County

Dear Lily Toy:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) for the above-referenced project (Project) dated May 13, 2022. The Department appreciates this opportunity to comment on the Project, relative to impacts to biological resources.

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 following are informal comments intended to assist the Lead Agency in making informed decisions early in the Project development and review process.

Project Description and Location

The Project as proposed in the NOP is to update the City of Redding's General Plan which, "*will provide the long-term planning blueprint for the improvements needed to house the City's growing population and needed services and industry over through 2045.*" In addition, the General Plan Update will, "*identify long-term goals; provide a basis for decision-making; provide citizens a forum for input on their community's direction; and inform citizens, developers, decision-makers, and other cities and Shasta County of the expectations for development. The General Plan will advance the City's vision for a resilient, equitable, and healthy community with high-quality development and urban centers and corridors.*"

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The Project planning area is the City of Redding and surrounding areas within the City's sphere of influence which is in south-central Shasta County. The Project will focus new growth into areas of the city where services exist or can be expanded to serve additional development. The development will occur in a Planning Area footprint that is approximately 24 square miles smaller than what was proposed in the 2000-2020 General Plan.

Comments and Recommendations

The NOP states the implementation of the General Plan may have a significant effect on the environment including direct and indirect growth-inducing impacts as well as cumulative impacts. It further states the development accommodated under the General Plan Update may have an adverse effect on rare, threatened, or endangered species and/or the habitat supports them including impacts to wildlife movement corridors, riparian, and wetland habitats. To determine significance, the Department recommends biological surveys be conducted for these development areas and provide the analysis and rationale in the forthcoming draft Environmental Impact Report (DEIR). To enable Department staff to adequately review and comment on the proposed Project, we recommend the information attached (Attachment 1) be included in the DEIR, as applicable.

Goals and Policies

The Department reviewed the Natural Resources Element of the City of Redding's current 2000-2020 General Plan for reference. The Department supports the goals and policies of the current General Plan Natural Resource Element, and recommends the City strengthen them to provide even further protection for natural resources. The Department recommends the City of Redding utilize the General Plan Update as an opportunity to assess the effectiveness of these goals and policies.

For example, under Goal NR7 *Recognize the Aesthetic and Biological Values of Oak Woodlands and Other Natural Vegetation*, Policy NR7B states, "*Identify and establish appropriate "tree mitigation areas" to be used for the planting of native trees in concert with development project mitigation.*" This Policy should propose mitigation areas be protected in perpetuity by a conservation easement. For example, the Policy could be modified as follows: "*Identify and establish appropriate "tree mitigation areas" to be used for the planting of native trees in concert with development project mitigation. **The "tree mitigation areas" will be protected in perpetuity by a conservation easement.***" Adding a conservation easement to this Policy would strengthen the implementation and effectiveness of Goal NR7 to conserve oak woodlands.

The Department looks forward to reviewing the forthcoming draft Environmental Impact Report and is available for consultation should City of Redding staff have any

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questions or concerns. Please contact Amy Henderson, Senior Environmental Scientist (Specialist), at R1CEQARedding@wildlife.ca.gov for additional assistance.

Sincerely,

DocuSigned by:

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Brett Kormos, Acting Regional Manager
For Tina Bartlett, Regional Manager
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Habitat Conservation Planning Branch