



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



August 25, 2023

Vishnu Krishnan, Senior Planner
Development Services Department
City of Redding
777 Cypress Avenue
Redding, CA 96001
vkrishnan@cityofredding.org

**SUBJECT: REVIEW OF CENTER OF DRAFT ENVIRONMENTAL IMPACT REPORT
FOR CITY OF REDDING GENERAL PLAN UPDATE, STATE
CLEARINGHOUSE NUMBER 2022050300, SHASTA COUNTY**

Dear Vishnu Krishnan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) dated July 2023, 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 and Game Code, §§ 711.7, subd. (a) & 1802; Public Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee 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 (Public 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 California Endangered Species Act (CESA) (Fish and Game Code, § 2050 et seq.), or state-listed rare plant

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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pursuant to the Native Plant Protection Act (NPPA; Fish and Game Code § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Project Summary

The Project, as described in the DEIR, is as follows:

“The 2023-2045 General Plan Update is an update to the City of Redding’s adopted General Plan. The proposed project includes comprehensive updates to the required elements under the State Planning and Zoning Law, as well as other optional elements that the City has elected to include in its General Plan. In addition, an Environmental Justice Element is embedded throughout the updated General Plan’s goals and policies. Each element includes goals and policies that are based, in part, on creating an equitable, sustainable, and livable community of neighborhoods, and provides updates based on State and local law, and other considerations. The proposed project will also involve decreasing the size of the City’s Planning Area to generally match boundaries of the City’s existing Sphere of Influence (SOI) while including Churn Creek Bottom. The proposed project would not alter the City’s existing land use plan with the exception of reducing the size of the Planning Area as shown in Figure 1-3, Existing Land Use Plan.”

Comments and Recommendations

CDFW responded to a Notice of Preparation for the City of Redding (herein, City) General Plan Update Environmental Impact Report in June 2022. CDFW offers the comments and recommendations below to assist the City of Redding in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

General Comments

Section 5.4 of the DEIR, Biological Resources, states *“Based on results provided by the California Natural Diversity Database a total of 84 special-status species have documented occurrences or have potential to occur within the [Sphere of Influence]”*. This statement, and each supplemental statement to follow in species subsections, are mis-leading. While 84 special-status species within the City of Redding have been observed and reported to the California Natural Diversity Database (CNDDDB), that number does not account for the total number of species with *potential to occur*. For example, the City bisects the known range of Crotch’s bumble bee (*Bombus crotchii*), and suitable habitat for this species occurs throughout the City. Therefore, this species has potential to occur despite the lack of reported observations on the CNDDDB. CDFW recommends revising such statements throughout Section 5.4 to reflect that some species have documented occurrences and there are more species with potential to occur, in lieu of the CNDDDB being a positive-sighting database.

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While the DEIR identifies some special-status species with the potential to occur throughout the City, the DEIR does not specifically address biological resources with potential to occur in the areas mapped as “primary” and “secondary” growth areas. As demonstrated in Figures 3-1 and 3-2, previous Secondary Growth Areas are now proposed as Primary Growth Areas. Since these areas have been identified as Primary areas for land modification and development, such activities may have potentially significant impacts to biological resources and therefore, CDFW reiterates the need to perform more comprehensive biological studies of these areas to identify such impacts. CDFW recommends the inclusion of such studies into the final EIR.

Special-Status Bumble Bees

On September 30, 2022, the candidacy of four California bumble bee species was reinstated under CESA. As such, Crotch’s bumble bee (*Bombus crotchii*), whose range bisects the City, receives the same legal protection afforded to endangered or threatened species (Fish and Game Code, §§ 2074.2 and 2085). It is illegal to import, export, take (hunt, pursue, catch, capture, or kill, or attempt engage in any of these activities), possess, purchase, or sell CESA-listed species, or any part or product thereof (Fish and Game Code, §§ 86, 2080 and 2085).

The area in and around Redding contains potentially suitable habitat for Crotch’s bumble bee. Land modification, ground disturbance and habitat removal all have the potential to significantly impact local bumble bee populations. Without appropriate avoidance and minimization measures, potentially significant impacts are associated with activities included throughout the updated General Plan.

CDFW recommends including Crotch’s bumble bee in the special-status invertebrate species lists and including methods for promoting native pollinator species throughout pertinent sections of the DEIR. CDFW recommends and encourages all future revegetation efforts to use locally occurring native trees, shrubs, and flowering plants which help to benefit and promote native wildlife specifically, California’s insect pollinators. CDFW discourages the use of non-native vegetation for actions described in the DEIR, including but not limited to landscaping of future planned development areas, landscaping throughout Redding’s city parks, public open spaces, and habitat revegetation efforts, among others.

The California Native Plant Society (CNPS) website (<https://www.cnps.org>) 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/>), 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 see the CNPS Guidelines for Landscaping to

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Protect Native Vegetation from Genetic Degradation at:
<https://www.cnps.org/wp-content/uploads/2018/04/landscaping.pdf>.

BIO-4

As stated in BIO-4, Policy NR7A directs the City to maintain, where possible, habitat linkages and wildlife corridors. CDFW recommends the City include a policy to not only maintain linkages but strive to create additional connectivity corridors throughout the City, specifically east-west connectivity corridors. BIO-4 identifies the Sacramento River, Churn Creek, and Stillwater Creek as providing north-south habitat connectivity within the City however, according to the California Biogeographic Information System (BIOS), an Essential Connectivity Area (ECA) occurs just west of Redding. With connectivity corridors providing only north and south movement opportunities, CDFW recommends a focus on east and west movement opportunities, to create linkages specifically to the nearest ECA.

Additionally, according to the state Fish Passage Assessment Database, at least three total fish barriers, several partial fish barriers, and numerous more unassessed crossings occur within City limits. CDFW recommends also incorporating policies that include assessing and planning for additional aquatic connectivity opportunities into the updated General Plan. Incorporating more comprehensive connectivity policies into the updated General Plan safeguards biodiversity by encouraging genetic diversity within our local wildlife populations and ensuring adaptability and resiliency for future populations. Habitat connectivity may sustain crucial ecological functions of wildlife including pollination, seed dispersal and pest control, thereby bolstering overall ecosystem health and stability throughout the City of Redding. Promoting our natural connectivity corridors may play a pivotal role in Redding's climate resiliency, and such corridors may facilitate the migration of species as they adapt to changing environmental conditions.

Pertinent to Section 5.16 of the DEIR, Transportation and Traffic, maintaining and promoting connectivity may mitigate the significant threat of wildlife-vehicle collisions by implementing wildlife crossings and infrastructure, enhancing road safety for both the citizens of Redding and local wildlife. Integrating wildlife connectivity into the updated General Plan exemplifies an adaptive management approach to urban development, which may harmonize urban growth with the conservation of natural resources.

For more information regarding habitat connectivity, please visit:
<https://wildlife.ca.gov/Science-Institute/Habitat-Connectivity>

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BIO-5 and BIO-6

As demonstrated in Figure 5.4-1, many of the areas proposed as Primary Growth Areas have also been classified as oak woodlands. As detailed in the DEIR, Policy NR6A states “*Strive to preserve and protect existing native oaks, especially valley oaks that are often associated with riparian habitats, in the design and review of development projects. The preservation of stands of trees within developments is generally preferred over preservation of individual trees, with the exception of special-status species, heritage trees, and other trees as may be identified in the City’s Municipal Code*”. CDFW does not believe this policy as it is written, nor the City of Redding’s Tree Ordinance, is effectively conserving and preserving oak woodlands throughout the City therefore, CDFW does not concur with the significance determination as stated in BIO-5, that impacts would be less than significant, with such policy implementation. This inefficiency to conserve and preserve oak woodlands has been made prevalent through numerous and continuing City project approvals that include permanent removal of oak woodland habitat without adequate avoidance, minimization or mitigation proposed or required by the City. Examples of recent projects include, but are not limited to, Tentative Subdivision Map S-2021-01590, River Crossing Marketplace Specific Plan and Center for Hope Apartments II.

In lieu of Policy NR6C, which calls for periodic review of the Tree Ordinance to assess current standards and programs to protect, preserve, restore, and replant native trees, and to amend the ordinance as may be necessary, CDFW recommends the review, assessment, and amendment occur, ideally prior to finalizing the updated General Plan. CDFW also recommends the amendment include clear and specific mitigation strategies for the future permanent removal of oak woodlands and enforcement regulations to ensure measures are in place to conserve and preserve oak woodland habitat effectively. As stated in CDFW’s June 2022 comment letter, identifying specific mitigation areas and conservation methods, such as the implementation of conservation easements, would strengthen the implementation and effectiveness of local policies and goals to conserve oak woodlands throughout the City of Redding.

While CDFW acknowledges that Policy NR6C mentions the preservation of tree stands, CDFW recommends the revision of all oak woodlands policies to include oak woodland habitat as a whole, rather than individual trees. While individual trees hold intrinsic value and should be conserved, conserving and preserving whole habitat blocks offers numerous ecological advantages and enhances our local environment. Conserving blocks of habitat may significantly boost biodiversity and may foster a diverse ecosystem which may serve as hub for essential ecosystem services that benefit all inhabitants of the City of Redding, including but not limited to pollination, water purification and carbon sequestration. Blocks of habitat exhibit remarkable resilience to environmental changes and disturbances, offering genetic diversity among species populations and regulating local climate conditions. Amending the Cities oak woodland policies to include whole habitat blocks may ensure more robust and sustainable conservation efforts which will aid in the goal to preserve our local

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natural environmental for our community and future generations.

Policy NR6B directs the City to consider identifying appropriate "areas" for planting native trees to offset development impacts to woodland resources. CDFW recommends policy NR6B be revised to remove the word "consideration", since the need to identify appropriate mitigation areas for native habitats has been proven a necessity to ensure the conservation and preservation of such habitat and for mitigation of future potentially significant impacts, which have been identified as "significant and unavoidable" in BIO-6 of the DEIR. The DEIR states that there are no feasible mitigation measures as the City cannot control development or mitigation outside the City. CDFW disagrees – the City has the authority to require mitigation for impacts within City limits, and can require mitigation such as land preservation, enhancement, and conservation anywhere that is within the general ecological subregion (northern central valley). Per CEQA Guidelines, which direct a lead agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts, and/or mitigate significant impacts (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370), CDFW recommends incorporating such feasible mitigation measures into the DEIR. The City has a responsibility under CEQA to prevent avoidable damage to the environment by requiring use of alternatives or mitigation measures (Public Resources Code, § 21002.1(b); CEQA Guidelines, §§ 15002 (a)(3), 15021).

Promoting Collaboration

CDFW recognizes the critical importance of preserving and protecting the state's diverse ecosystems and wildlife therefore, CDFW maintains a strong commitment to collaborate with local governments in the development and implementation of local policies and ordinances that encompass biological resources. CDFW is enthusiastic for the possibility to assist the City of Redding in fostering a harmonious coexistence between human development and preservation of Redding's unique and invaluable biological resources through local policy and ordinance. The City is encouraged to engage with CDFW if/when collaboration of applicable policies appears warranted.

Environmental Data


CEQA requires that information developed in environmental impact reports and negative declarations be 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 special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). This requirement relates to Policy NR4C of the General Plan. The CNDDDB online field survey form and other methods for submitting data can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

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We appreciate the opportunity to offer comments and recommendations that may assist the City of Redding in adequately analyzing and minimizing impacts to biological resources.

If you have any questions, please contact Erika Iacona, Senior Environmental Scientist Specialist, by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
Northern Region

ec: State Clearinghouse
State.Clearinghouse@opr.ca.gov

Erika Iacona
R1CEQARedding@wildlife.ca.gov