



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**



Governor's Office of Planning & Research

**March 6 2023**

March 3, 2023

## STATE CLEARING HOUSE

Tiffany Lightle, Associate Planner  
 City of Redding  
 777 Cypress Avenue  
 Redding, CA 96001

### **SUBJECT: REVIEW OF REDDING SCHOOL OF THE ARTS HIGH SCHOOL PROJECT, STATE CLEARINGHOUSE NUMBER 2023020110, SHASTA COUNTY**

Dear Tiffany Lightle:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND) dated February 2023, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines<sup>1</sup>.

#### **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 & G. Code, §§ 711.7, subd. (a) & 1802; Pub. 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 (Pub. 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 & G. Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and G. Code § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

<sup>1</sup> 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.

Tiffany Lightle  
March 3, 2023  
Page 2

## Project Description

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

*“Use Permit UP-11-07 authorized construction of a kindergarten through 8th grade public charter school, designed to accommodate approximately 400 students for the Redding School of the Arts. The current project amendment includes a request for construction of a new 300-student-capacity high school facility, associated performing art theater, and additional parking stalls at the existing facility.”*

## Comments and Recommendations

CDFW recognizes that the City of Redding has taken the appropriate steps to identify and assess potential impacts to biological resources. CDFW responded to early consultation requests from the City of Redding in July 2022 and October 2022. While CDFW recognizes that many of the concerns identified throughout early consultation were addressed, and that many of the avoidance and minimization measures listed in the ISMND are adequate in avoiding and minimizing potential impacts to biological resources, CDFW reiterates the following comments and recommendations.

### Blue Oak Woodlands

Removal of Oak Woodlands throughout Shasta County without adequate mitigation continues to result in a cumulative permanent loss of oak woodlands throughout the region. Oak woodlands are important to a wide variety of wildlife species and have higher levels of biodiversity than virtually any other terrestrial ecosystem in California<sup>2</sup>. Oak woodlands provide habitat for nearly half of the 632 terrestrial vertebrates species found in the state<sup>3</sup>.

The ISMND includes a brief discussion of trees and tree removal throughout the project area which states *“Tree cover on the site hosts pockets of blue oak with a moderate canopy to sparser tree cover over other areas, which are dominated by annual grasses and brush species. Because of the moderate coverage of trees on the site, the project’s grading and utility demands make it unfeasible to save trees in the main school facility construction area. Although consideration of project placement was carefully considered, removal of approximately 42 trees are posed with construction of the project improvements. All trees outside of this area would be retained.*

*The City has adopted a Tree Management Ordinance (Chapter 18.45 of the RMC) that promotes the conservation of mature, healthy trees in the design of new development. The ordinance also recognizes that the preservation of trees will sometimes conflict with necessary land-development requirements. The City’s*

---

<sup>2</sup> Bernhardt, Elizabeth A., and Swiecki, Tedmund J., 2001. *Ecological Importance of California Oak Woodlands*. Available here: <https://oaks.cnr.berkeley.edu/wp-content/uploads/2019/03/Ecological-Importance-of-CA-OW.pdf>

<sup>3</sup> Drill, Sabrina., Purcell, Kathryn., and Tietje, William. 2005. *Oak Woodlands as Wildlife Habitat*. Available here: [https://www.fs.usda.gov/psw/publications/purcell/psw\\_2005\\_purcell002\\_tietje.pdf](https://www.fs.usda.gov/psw/publications/purcell/psw_2005_purcell002_tietje.pdf)

Tiffany Lightle  
March 3, 2023  
Page 3

*General Plan EIR further acknowledges that preservation of native trees will sometimes conflict with normal land development and that implementation of the General Plan will ultimately set aside over 7,000 acres of open space, much of which contains oak habitat. But efforts must still be made to retain existing trees if reasonably possible, and to sufficiently plant new trees in the context of the new development.*

*In addition to tree retention efforts, the developer is also obligated to replant suitable new trees at the time of construction for shade and the enjoyment of students and staff. The Tree Management Ordinance identifies minimum planting criteria of one tree per 1,000 square feet of gross floor area or covered space. In addition, the project's parking lot will require one 15-gallon tree for every 30 feet of frontage per Landscape Ordinance and shade trees are required at a ratio of one tree for every 4 spaces per the Off-Street Parking Ordinance. Thus, with retention of trees outside the building envelope and the planting of new trees as a standard condition of development, the project is consistent with the intent of the Tree Management Ordinance. Impacts would be less than significant."*

*CDFW's early consultation letter, dated October 2022, states "The Department concurs with the Biological Resource Assessment's recommendation to enact a tree delineation, impacts assessment, tree health survey and tree protection requirements... Mitigation should be developed for impacts to the blue oaks proposed for removal. The goal of mitigation should be to effectively attain no net loss of oak habitat."*

The above ISMND excerpt does not specify the number of trees to be planted, their species, proposed revegetation plan, monitoring plan or success criteria. Additionally, despite the recommendation listed in the Biological Resource Assessment (ISMND, Attachment C), and CDFW's early consultation recommendations, it appears a tree delineation was not performed. If a tree delineation was performed, results do not appear to be included in the ISMND.

CDFW does not believe the ISMND offers an adequate analysis of oak woodland habitat removal throughout the Project area, nor does the discussion offer adequate measures to reduce impacts to less than significant. CDFW strongly recommends the formulation of a Habitat Restoration Plan, or similar, which would explicitly quantify number of trees to be removed, acres of habitat impacted, trees proposed to be planted onsite, any proposed offsite mitigation, monitoring and success criteria, if applicable.

Mitigation should be implemented to reduce this impact to less-than-significant. Mitigation at a minimum of 3:1 should be developed for impacts to oaks proposed for removal. This ratio would include both permanent and temporal loss of the oak woodland habitat. Impacts to oak woodlands may be mitigated in one of two ways: (1) credits at a 3:1 ratio could be purchased from a 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. The

Tiffany Lightle  
March 3, 2023  
Page 4

goal of mitigation should be to effectively attain no net loss of oak habitat. In addition, CDFW strongly encourages retaining, designing, and constructing around existing mature and healthy oak trees.

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, Environmental Scientist, by email at [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
*Curt Babcock*  
974D273FEE784E2...

Curt Babcock for  
Tina Bartlett, Regional Manager  
Northern Region

ec: State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Erika Iacona  
[R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov)