



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



December 15, 2023

Danny Castro, Assistant Planner
City of Redding
777 Cypress Avenue
Redding, CA 96001
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SUBJECT: Review of Tentative Subdivision Map S-2023-00582, State Clearing House Number 2023110164, Shasta County

Dear Danny Castro:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Initial Study and Mitigated Negative Declaration (ISMND) dated November 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 G. 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

¹CEQA 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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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 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.

Project Description

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

“Subdivision Map Application S-2023-00582, submitted by L&S Redding Development, LLC, proposes to subdivide approximately 10.5 acres into 21 single-family residential lots as well as roadways and other supporting infrastructure to create the River Subdivision. Residential lot sizes range from 7,865 square feet to 55,037 square feet. However, the majority of the lot sizes are within the 11,000 square foot to 17,000 square foot range. The project proposes a density of 2.3 units per net developable acre, excluding the area within the Federal Emergency Management Agency (FEMA) floodplain along the Sacramento River..”

Comments and Recommendations

CDFW was pleased to have responded to an early consultation request from the City of Redding (Lead Agency) in August 2023. CDFW recognizes that some comments were responded to, however, CDFW provides the following comments to further assist the Lead Agency in adequately identifying, avoiding and/or minimizing potentially significant impacts to biological resources.

Special-Status Bumble Bees

As stated in our August communication, this Project bisects the range of Crotch's bumble bee (*Bombus crotchii*), a CESA-candidate species as of September 2022. Attachment E of the ISMND, “Gallaway Response to CDFW” states “There nearest CNDDDB occurrence (#4) is approximately 27 miles from the BSA (Biological Study Area) in Tehama County and is from 1956...Known food sources, *Lupinus bicolor* and *Medicago polymorpha*, were observed

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within the BSA, and a few other floral resources have bloom periods in the spring, summer, and fall; however, the BSA is dominated by disturbed annual grassland and floral resources within the BSA are insufficient to support Crotch's bumble bee populations. The inclusion of additional analyses and a focused survey is not warranted in the BRA document."

CEQA Guidelines Section 15065-15065.7 outlines the Lead Agency's responsibility to evaluate impacts on plant and animal species, including those that are CESA listed. The CNDDDB is not an exhaustive and/or comprehensive inventory of all rare species and natural communities statewide and therefore, species that have not been reported to CNDDDB do not negate their potential to occur. Occurrence data may not always be available for a variety of reasons including the lack of systematic surveys across all potential habitat. Absence of occurrence records should not be interpreted as absence of the species at or near a given site and all species with potential to occur should be analyzed. Specific to bumble bees, records should be evaluated by consulting a combination of reliable data sources including the occurrence database for the [Bumble bees of North America](#) (which can be requested from its curator Dr. Leif Richardson), citizen science data platforms that have been verified such as [iNaturalist](#) and [Bumble Bee Watch](#). Floral resources in bloom from February to October may, at the very least, have potential to support Crotch's bumble bee queens, with a known flight season between February and March².

CDFW maintains its recommendation to the Lead Agency to include a thorough habitat assessment for Crotch's bumble bee in the final ISMND and if warranted, to perform bumble bee surveys by a qualified biologist throughout the Project area to avoid potential impacts to a CESA-candidate species. The [June 2023 Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#) is a useful resource for performing adequate habitat assessments and appropriate survey guidelines.

² California Department of Fish and Wildlife. June 6, 2023. Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Available here: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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California Endangered Species Act (CESA)

Please be advised that a [CESA permit](#) must be obtained if the Project has the potential to result in “take” (hunt, pursue, catch, capture, kill, or attempt thereof) of plants or animals listed under CESA, either during construction or over the life of the project. Issuance of a CESA permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project has the potential to result in the take of a CESA-listed species, early consultation is encouraged, as significant modification to the Project may be necessary to minimize and fully mitigate impacts as required by Fish and Game Code Section 2081 (b) (2).

Conclusion

CDFW commends the City of Redding's continued efforts in consulting CDFW early in the project development process and appreciates the opportunity to assist the Lead Agency in adequately avoiding, minimizing, and mitigating potentially significant 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

cc: State Clearinghouse
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