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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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November 18, 2024

Beth Lindauer
Community Development Director
555 Washington Street
Red Bluff, CA 96080
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SUBJECT: CITY OF RED BLUFF GENERAL PLAN UPDATE, DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE NUMBER 2024030525[1]

Dear Beth Lindauer:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines[2].

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 Agency 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

[1] https://ceqanet.opr.ca.gov/2024030525/2
[2] 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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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 plants 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.

REGULATORY REQUIREMENTS

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" of plants or animals listed under CESA, either during construction or over the life of the Project. Take, as defined by Fish and Game Code section 86 is to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." 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 will impact CESA listed species, early consultation is encouraged as significant modification to the Project and impact are to be fully mitigated in order to obtain a CESA Incidental Take Permit[3].

Lake and Streambed Alteration Program (LSA)
Notification is required, pursuant to CDFW's LSA Program (Fish & G. Code section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA (Pub. Resources Code section 21000 et seq.) as the Responsible Agency. To obtain information about the 1602 Notification process, please access the Lake and Streambed Alteration Program[4].

[3] https://wildlife.ca.gov/Conservation/CESA/Permitting
[4] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA

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Fully Protected Species
Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take, except for collecting these species for necessary scientific research and relocation of a fully protected bird species for the protection of livestock. Take of any fully protected species is prohibited, and CDFW cannot authorize their take in association with a general project except under the provisions of a Natural Communities Conservation Plan (NCCP), Fish and Game Code section 2081.7, or a Memorandum of Understanding for scientific research purposes. "Scientific Research" does not include an action taken as part of specified mitigation for a project, as defined in Section 21065 of the Public Resources Code. To obtain information about Fully Protected Animals, please access CDFW's Fully Protected Animals[5]

PROJECT DESCRIPTION SUMMARY

Proponent City of Red Bluff

Objective The City of Red Bluff (Lead Agency) is proposing to prepare a comprehensive update to its existing general plan.

Biological Setting
Red Bluff (City, Project area) is situated in the northern Sacramento Valley along the Sacramento River and is primarily comprised of riverine, riparian, oak woodland and grassland habitats. The Sacramento River fosters a rich biological mosaic, comprising of numerous diverse ecosystems. Such ecosystems host a variety of CESA-listed and other state special status aquatic and terrestrial species. Among these special status species are anadromous fishes, including four distinct runs of Chinook Salmon (*Oncorhynchus tshawytscha*)(winter-run, spring-run, fall-run, and late fall-run), Central Valley steelhead trout (*Oncorhynchus mykiss irideus*), and Green Sturgeon (*Acipenser medirostris*), whose migrations to spawn in tributaries throughout the Red Bluff and greater Central Valley area epitomize the upper Sacramento River watershed. The river's riparian habitat supports countless migrant and resident birds, including the bald eagle (*Haliaeetus leucocephalus*), osprey (*Pandion haliaetus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*); while reptiles, such as the western pond turtle (*Emys Marmorata*), find refuge in the riparian corridor and nest throughout the terrestrial

[5] https://wildlife.ca.gov/Conservation/Fully-Protected

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landscapes adjacent to the river. The grassland and oak woodland habitat throughout the City provide foraging and nesting for raptors, like the Swainson's hawk (*Buteo swainsoni)*, Crotch's bumble bee (*Bombus crotchii*) and burrowing owl (*Athene cunicularia);* and hosts unique seasonal vernal pool wetlands which support specialized wildlife and botanical communities, including rare and endemic species adapted to this habitat, including the western spadefoot (*Spea hammondii*) and the Red Bluff dwarf rush (*Juncus bufonius* var. *congestus)*.

Specific Comments and Recommendations

In January 2024, CDFW submitted comments to the Lead Agency in response to the Notice of Preparation for the DEIR recommending specific information and impact analyses to include in the DEIR. As the DEIR states, the update to the general plan will not, in and of itself, result in impacts to biological resources. However, such updates include the facilitation of future land modification, maintenance activities, and development expansion, all of which have the potential to significantly impact biological resources. CDFW offers the following comments and recommendations below to assist the Lead Agency in adequately identifying, avoiding, minimizing and/or mitigating potentially significant, direct, and indirect impacts on biological resources with the implementation of the City of Red Bluff's General Plan update.

Reduction of Human and Wildlife Conflict

The Project area provides migration corridors for a variety of wildlife species, more commonly in the City's open spaces. Maintaining and establishing these open space areas within, and adjacent to, urban centers like Red Bluff, results in humans living with wild animals in close proximity. As our human population expands into wildlife habitat, human-wildlife interactions have increased. Conflict between humans and wildlife is a growing concern in developing areas, especially where the conflict results in livestock losses, property damage, spread of wildlife diseases, animal welfare issues and/or mortality. For more information about preventing potential conflict for a variety of wildlife species, please visit Human-Wildlife Conflict[6].

Section 5c of CDFW's January comment letter recommends including a discussion of potential adverse impacts from human-wildlife conflict, among other topics. The DEIR does not describe policies to avoid and manage human and wildlife conflict situations throughout the Project area. CDFW recommends

[6] https://wildlife.ca.gov/HWC

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the Lead Agency strongly considers the development and implementation of policies and ordinances into the Final EIR to prevent human-wildlife conflict situations. CDFW also offers the following recommendations to the Lead Agency when considering policies to avoid human and wildlife conflict:

1. Wildlife Friendly Fencing- CDFW understands fences are essential for controlling livestock and trespass however, inappropriately designed or installed fencing may create serious hazards and/or barriers for wildlife. Therefore, CDFW strongly encourages the Lead Agency to consider a policy that includes perimeter fencing, and residential fencing to be constructed with wildlife friendly fencing techniques, to reduce the potential of injury or death and provide safe connections and corridors between the habitats that wildlife species use during daily and annual movements. Please consult A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind[7] for construction recommendations and use of wildlife friendly fencing. CDFW staff are also available to assist in providing further recommendations for effective wildlife friendly fencing techniques and the locations where they should be used.

2. Watering and Feeding Ungulates- California is home to many native ungulate species, including elk, mule deer, and pronghorn. They may be found in diverse habitats throughout the state that may include remote, rural, and residential areas. These animals may live in resident or migratory herds.

   Watering and feeding ungulates can have negative consequences for both the species population and the surrounding ecosystem. Providing food may lead to habituated animals, dependency on human-provided food sources, overcrowding, and has been known to lead to disease transmission among herds. CDFW recommends the City develop local policies and enforceable codes aimed at preventing watering and feeding of ungulates, and allowing for the construction of deer exclusion fencing in appropriate locations as part of an updated general plan. CDFW staff are available to assist the City in targeting most appropriate locations for installing exclusionary fencing where it would be most

[7] fwp.mt.gov/binaries/content/assets/fwp/conservation/land-owner-wildlife-resources/a_landowners_guide_to_wildlife_friendly_fences.pdf

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effective. For more information, please visit Human-Wildlife Conflicts: Ungulates[8].

3. Human-Wildlife Conflict with Black Bears- Black bears provide many ecosystem benefits by serving as seed dispersers, scavengers, and predators. They are omnivores and will consume nearly anything, including seeds, plants, berries, other animals, pet food, human food, and trash. Improperly stored garbage, bird feeders, fruit trees and accessible pet food can attract bears which is likely to result in bears becoming habituated to and losing their fear of humans. This change in bear behavior can lead to an increase in bear encounters, property damage, loss of small livestock or pets. CDFW recommends the City develop policies and enforceable codes aimed at preventing bear and human conflict as part of current or future General Plan updates. For more information about preventing potential conflicts with black bears, please visit Human-Wildlife Conflicts: Black Bears[9].

Conservation and Development

The DEIR does not discuss specific conservation strategies when planning for the future expansion of the City. To accommodate increased housing, transportation and other related infrastructure, the development of currently undeveloped areas are anticipated. First and foremost, CDFW encouraged the City to consider maximizing the development where it already exists, as opposed to where it doesn't, in order to protect natural lands from development impacts and habitat loss. An example of maximizing development where it already exists would include, but is not limited to, covering parking lots and buildings with solar infrastructure, as opposed to developing undeveloped land with solar infrastructure.

Additionally, CDFW recommends the Lead Agency consider referencing the following regional and state-wide natural resource conservation strategies to ensure conservation is integrated in the future planning and expansion of the City throughout the general plan: Safeguarding California Plan[10]; California State Wildlife Action Plan: A Conservation Legacy for Californians[11]; and

[8] https://wildlife.ca.gov/HWC/ungulates
[9] https://wildlife.ca.gov/HWC/Black-Bears
[10] https://www.slc.ca.gov/sea-level-rise/safeguarding-california-plan-2018-update/
[11] https://www.slc.ca.gov/sea-level-rise/safeguarding-california-plan-2018-update/

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California 2030 Natural and Working Lands Climate Change Implementation Plan[12]. To make connections between the City's general plan and the various statewide conservation plans listed above, CDFW staff recommend the Lead Agency become acquainted with the goals, objectives, and strategies outlined in each plan, and identify any overlapping areas between the general plan elements and statewide goals. Generally, such overlapping goals may include the incorporation of habitat preservation zones, implementing green infrastructure, promoting sustainable practices to ensure that local policies are contributing to regional and statewide conservation goals, striving to plan for and build wildlife corridors, preserving critical habitat areas, or areas of ecological significance that intersect with transportation routes and proposed development areas. Furthermore, evaluate potential impacts of transportation infrastructure and circulation patterns on wildlife and their habitats and consider factors such as habitat fragmentation, noise pollution, air pollution, and the risk of wildlife-vehicle collisions. Identify areas where general plan activities may conflict with wildlife conservation goals outlined in the plans and explore opportunities to integrate wildlife conservation considerations into the Lead Agency's circulation planning and decision-making processes, like the general plan. This may involve incorporating wildlife crossings, habitat restoration measures, or green infrastructure into transportation projects to mitigate negative impacts on wildlife and enhance habitat connectivity. Once overlapping connections, potential impacts, and opportunities of integration have been identified, CDFW staff are available to collaborate and further develop effective strategies that may aid the Lead Agency in balancing the City's future growth with statewide conservation goals.

Wildlife and Habitat Connectivity

Connectivity refers to the degree that organisms or natural processes can move unimpeded across landscapes – both terrestrial and aquatic. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them. A functional network of connected habitats is essential to the continued existence of California's diverse species and natural communities, in the face of both human land use and climate change. Climate change may impact both the quality and distribution of habitat and shift the known and historical ranges of species. Thus, connectivity is important to allow for wildlife to adapt, adjust, and move in response to climate change. Habitat connectivity is also

[12] https://ww2.arb.ca.gov/sites/default/files/2020-10/draft-nwl-ip-040419.pdf

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necessary to reduce wildlife-vehicle collisions, which put both people and wildlife at risk of injury or death.

As stated in CDFW's January comment letter, the California Essential Habitat Connectivity dataset available in CDFW's Biogeographic Information System[13] (BIOS), indicates that the Project area bisects an Essential Connectivity Area (ECA) that spans the entire length of the Project area north to south. Similarly, the California Fish Passage Assessment Database[14], available in BIOS, indicates 15 unassessed potential fish passage barriers. ECA's support for native biodiversity and areas essential for ecological connectivity between them. Future Project facilitation has the potential to impact on the ecological integrity and function of wildlife corridors supporting resident and transient wildlife movement and such habitat fragmentation could threaten the viability of remaining natural resources. Maintaining, evaluating, and remediating wildlife corridors and habitat connectivity is essential in evaluating longevity of species and remains increasingly important with consideration to California's existing and continued habitat loss and climate change.

In September 2024, the Assembly Bill (AB)1889 was approved, requiring the conservation element of a city or county's general plan to consider the effect of development within the jurisdiction on the movement of wildlife and habitat connectivity. The bill requires identifying and analyzing connectivity areas, permeability, and natural landscape areas within the jurisdiction, identify and analyze existing or planned wildlife passage features, and consider the impacts of development and the barriers caused by development to wildlife and habitat connectivity. The bill authorizes a city, county, or city and county preparing to update its conservation element to consider incorporating appropriate standards, policies, and implementation programs, consult with specified entities, and consider relevant best available science.

The DEIR does not describe how the Lead Agency is going to prioritize wildlife connectivity with the future development and expansion of the City and does not include connectivity policies. Considering the importance of maintaining, remediating and creating wildlife connectivity, and in lieu of AB 1889, CDFW recommends specific details to be included throughout the DEIR regarding connectivity.

[13] https://wildlife.ca.gov/Data/BIOS
[14] https://nrm.dfg.ca.gov/PAD/

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Non-specific future projects, as referenced in the DEIR, are likely to result in increased traffic volume, wider roadways, habitat fragmentation and vulnerability of wildlife to vehicle mortality. Therefore, these activities may cause significant impacts to biological resources. CDFW recommends including specifics about how the Lead will include, analyze and plan for terrestrial and aquatic habitat connectivity in the DEIR. Including such information may ensure local wildlife corridors, migration routes and barriers are identified, mapped, preserved and/or remediated. The acknowledgment of local and migratory corridors, and barriers in county-wide transportation planning will aid the City in avoiding the division of Natural Habitat Blocks and Essential Connectivity Areas across landscapes, and instead link these habitats, which is likely to improve regional connectivity for the safety of those that utilize California's transportation systems, and California's species. In doing so, CDFW strongly encourages the Lead Agency to plan for and incorporate wildlife connectivity structures and features into future projects, including but not limited to, underpasses, upsized culverts, exclusionary deer fence and/or jump-out features.

For more information regarding the importance of habitat connectivity and framework for analyses and implementation, the California Essential Habitat Connectivity Project[15] may be a useful resource.

Low Impact Development and Stream Setbacks

Future actions resulting from the general plan update will include an increase in impervious surfaces. CDFW recommends including Low Impact Development[16] (LID) requirements into future projects stemming from the general plan, such as stormwater detention basins/bioswales to be employed for the avoidance and reduction in potentially harmful stormwater runoff. CDFW recommends the implementation of LID strategies, specifically bio-retention basins, to prevent a net-increase in potentially toxic stormwater runoff from an increase in impervious surfaces that may occur during the life of a Project.

LID strategies aim to protect water quality and manage stormwater as close to its source as possible, thus mitigating potential flooding and the outflow of toxic pollutants such as 6PPD-quinone, a chemical contaminant derived from

[15] https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC
[16] https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

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vehicle tires, suspected to negatively impact aquatic organisms[17], including CESA-listed salmonids occurring throughout the Project area.

CDFW supports and encourages the use of LID strategies because they have been found to minimize impacts to aquatic habitats by filtering out pollutants, decrease peak flows, minimize erosion, and increase ground water recharge. CDFW recommends including LID strategies into the general plan update element policies. Implementing bio-retention basins will aim to avoid and reduce potentially significant impacts to sensitive aquatic species known to occur locally and throughout the Sacramento River watershed.

Additionally, as the Lead Agency updates its general plan, incorporating stream setbacks is essential to protect water quality, manage flood risks, and preserve natural habitats. Stream setbacks create buffers between riverine systems, their associated riparian habitat, including but not limited to valley oak riparian forest, and development, helping to reduce pollution, protect wildlife, and prevent flooding. The Lead Agency should establish clear, science-based setback standards based on stream type and local conditions, with flexibility to account for erosion, stream migration, or shifting floodplains. These setbacks should be integrated into zoning regulations, limiting development in buffer zones and encouraging compatible uses like parks and open space.

By adopting stream setbacks into the general plan, the Lead Agency may balance growth with environmental sustainability, improving resilience and safeguarding natural resources for the future. CDFW staff are available to assist in the development of setbacks into element policies.

To ensure successful implementation of element policies, the Lead Agency should engage the community in future planning processes, emphasizing the benefits of stream setbacks for flood control, infrastructure protection, and ecological health. Climate change considerations should also be integrated, allowing for adjustments to setbacks as hydrological patterns change. Regular monitoring and enforcement will be necessary to ensure compliance, alongside incentives for restoration efforts. Lastly, coordination with state and regional watershed plans will help align efforts and maximize resources for stream protection.

<u>Impacts on Raptors</u>

The Project area contains suitable nesting and foraging habitat for raptors including, but not limited to, osprey and bald eagle. Both species are actively

[17] Tian, Z. et al. 2021. A ubiquitous tire rubber–derived chemical induces acute mortality in coho salmon. Science 371: 185-18.

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nesting along the Sacramento River within the City limits. Bald eagle is listed as endangered under CESA, Fully Protected under Fish and Game Code section 3511, and protected under the federal Bald and Golden Eagle Protection Act. Osprey are protected by Fish and Game Code section 3503 and are a CDFW Sensitive[18] species. The Project does not currently include measures to be implemented that would avoid, minimize, and mitigate impacts on nesting raptors. Absent mitigation, this Project has the potential to significantly impact these species, which may constitute a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

CDFW recommends a detailed analysis of potentially significant impacts to nesting raptors and the inclusion of a City-wide Raptor Protection Plan, to be reviewed by CDFW, prior to Project initiation. Key components of this plan should include a thorough habitat assessment to identify existing and potential nesting sites and foraging areas, the establishment of appropriate avoidance and minimization measures such as buffer zones or limited operating periods, mitigation strategies should nest removal or relocation need to occur, and monitoring protocols for raptor nests, along with reporting procedures for survey findings and monitoring efforts. Without adequate consideration and planning, nesting raptors in the vicinity of future projects and special events (e.g. fireworks and other loud and/or visually disturbing events), whose presence may necessitate visual and sound disturbance buffers for protection, could result in substantial delays to project implementation or special event schedules.

Western Burrowing Owl

On October 10, 2024, the California Fish and Game Commission accepted a petition to list western burrowing owl under CESA, advancing the species to the candidacy stage of the CESA listing process. Candidate species receive the same legal protection afforded to endangered or threatened species (Fish and G. Code, §§ 2074.2 and 2085) and take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). As required by Fish and Game Code section 2081(b)(2), the impacts of authorized take[19] shall be minimized and fully

[18] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406
[19] https://wildlife.ca.gov/Conservation/CESA

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mitigated. The March 2024 petition[20] provides evidence that burrowing owls are nearing extirpation as a breeding species in Tehama County, known as the most northern extant of the North Central Valley burrowing owl region[21].

The expansion of development, as projected with the general plan update, has potentially significant impacts to western burrowing owl. Such impacts extend beyond those that can be avoided during temporary phases of land modification during a Project. The projected alteration of nesting, roosting and foraging habitat throughout the Project has the potential to significantly compromise any remaining burrowing owls known to inhabit the Project area, further risking this species overall survival in Tehama County.

Given the recent state listing of this species, CDFW strongly recommends that the Lead Agency conduct a thorough analysis of potential impacts from the updated general plan on the species' population and habitat. This analysis should include detailed mapping of suitable habitat, assessment of land use designations, and identification of potential direct and indirect impacts. We encourage the Lead Agency to work with CDFW to incorporate avoidance, minimization, and mitigation measures in compliance with CESA. CDFW has made available recommendations and strategies for mitigation and conservation in its March 2012 Staff Report on Burrowing Owl Mitigation[22]. Additionally, adopting long-term monitoring and adaptive management strategies will ensure the species' conservation over time.

Crotch's Bumble Bee

On September 30, 2022, the California Fish and Game Commission accepted a petition to list Crotch's bumble bee (CBB) as endangered under CESA, advancing the species to the candidacy stage of the CESA listing process. As stated above, Candidate species are granted full protection under CESA during this period. Take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code, §§ 86, 2062, 2067, 2068, 2080, 2085; Cal. Code Regs., tit. 14, § 786.9). Additionally, CBB has a state ranking of S2, of which are imperiled and extremely rare (often five or fewer populations) and is listed as an invertebrate of conservation priority under the Terrestrial and Vernal Pool Invertebrates of Conservation Priority.

[20]https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=221396&inline
[21] Wilkerson and Siegel. 2011. Distribution and abundance of Western Burrowing Owls (Athene cunicularia hypugaea) in Southeastern California
[22] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843

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CBB thrives in regions that offer a diverse array of flowering plants with suitable nesting sites, such as those available throughout the Project area. CBB may inhabit diverse habitats including woodlands, grasslands, shrublands, agricultural lands and urban landscapes. Without appropriate avoidance and minimization measures for CBB, direct mortality and potentially significant indirect impacts associated with ground- and vegetation-disturbing activities may occur as a result of the Project. Indirect impacts may include loss of foraging plants, changes in foraging behavior, burrow collapse, nest abandonment, reduced nest success, and a reduction in health and vigor of eggs, young and/or queens.

The expansion of development, as projected with the general plan update, has potentially significant impacts to Crotch's bumble bee. Such impacts extend beyond those that can be avoided during temporary phases of land modification during a Project. The projected alteration of nesting, overwintering and foraging habitat throughout the Project has the potential to significantly compromise populations of Crotch's bumble bees potentially occurring throughout the Project area, further risking this species overall survival in Tehama County.

Oak Woodlands

As stated in Section 3.4.1, the City is primarily comprised of riparian, oak woodland, and grassland habitats. Section 3.2 of the DEIR mentions future development activities, such as low and medium density residential and commercial uses may impact oak woodland areas throughout the City. CDFW supports Conservation Element Policy 3.2 and 3.3 to "protect oak woodlands" and "preserve existing mature trees", as well as Action 3c to achieve a no-net-loss of native tree species. However, the DEIR does not discuss the mechanism for ensuring protection of oak woodlands, preservation of mature trees or the assurance of a no-net-loss policy with the impending future impacts associated with development of the City. A search of the City of Red Bluff website, and an oak woodland ordinance, or other related oak policies, were not found.

The distribution of oak woodlands throughout California has been decreasing steadily over the last several decades due to several factors of which include but are not limited to, land conversion, drought, wildfire and disease. As stated in the 2005 Tehama County Voluntary Oak Woodland Management Plan[23],

[23]https://www.tehamacountyrcd.org/files/3747458e5/Tehama+County+Voluntary+Oak+Woodland+Management+Plan.pdf

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only about one-third of the 10-12 million acres of oak woodlands remain throughout California. The importance of oak woodlands are numerous but specific to Tehama County, oak woodlands provide essential wintering habitat for the largest migratory deer herd in California, the Tehama deer herd. Tehama County has been identified as the only county in CDFW's Northern Region to have the highest quality oak woodland habitat, with several areas identified as oak woodland habitat preservation target zones[24], some of which appear to bisect the City.

It is unclear whether the Lead Agency refers directly to the Tehama County Oak Management Plan during City planning efforts that bisect oak woodland habitats however, this plan primarily includes voluntary actions and stewardship responsibilities of local landowners. CDFW does not believe a voluntary action plan, unaccompanied by local ordinance and policy, will aid in a no-net-loss of oak woodlands throughout the City. CDFW strongly urges the Lead Agency to develop a strategic City of Red Bluff Oak Woodland Habitat Management Plan. Such a plan would:

1. **Promote Biodiversity:** Protect and enhance the diverse plant and animal species that depend on oak woodlands, ensuring they thrive for generations to come.
2. **Prevent Habitat Loss:** Mitigate the impacts of urban sprawl, agriculture, and other developments that threaten the integrity of oak woodland ecosystems.
3. **Enhance Fire Resilience:** Implement strategies that reduce wildfire risk, such as controlled burns and invasive species management, while preserving the oak habitat's ecological value.
4. **Incorporate Community Engagement:** Involve local residents, landowners, and stakeholders in conservation efforts, creating a collaborative approach that strengthens the community's connection to the land.
5. **Ensure Long-Term Sustainability:** Establish monitoring and adaptive management protocols to ensure the plan's success and allow for adjustments as environmental conditions evolve.

In addition to a City of Red Bluff Oak Woodland Habitat Management Plan, CDFW recommends that the Lead Agency adopt complementary policies that support habitat conservation, such as an oak ordinance, zoning regulations

[24]https://ic.arc.losrios.edu/~veiszep/24fall2010/Herrig/G350_Herrig_Project.htm.

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that protect oak woodlands from development, incentives for landowners to restore and preserve oak habitats, and guidelines for sustainable land use practices. These policies will ensure the long-term success of the management plan and strengthen the Lead Agency's commitment to environmental stewardship.

CEQA Filing Fees

If a future Project has an impact on fish, wildlife, or habitat, filing fees are required. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Additionally, payment of a filing fee may be required for each underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

Promoting Collaboration

CDFW is charged with 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 Lead Agency in fostering a harmonious coexistence between human development and preservation of Red Bluff's unique and invaluable biological resources through local policy and ordinance. The Lead Agency is encouraged to engage with CDFW if/when collaboration is warranted.

Conclusion

CDFW appreciates the opportunity to comment on the DEIR to assist the Lead Agency in identifying and mitigating Project impacts on 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:
Adam McKannay
BE359DC694B14AE...

Adam McKannay, Acting for
Tina Bartlett, Regional Manager
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