



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**



November 22, 2024

Tiffany Lightle  
Associate Environmental Specialist  
City of Redding Public Works Department  
Engineering Division  
777 Cypress Avenue  
Redding, CA 96001  
[tlightle@cityofredding.org](mailto:tlightle@cityofredding.org)

**SUBJECT: REVIEW OF AIRPORT ROAD IMPROVEMENT PROJECT PHASE 2,  
SHASTA COUNTY, STATE CLEARINGHOUSE NUMBER 2024101104**

Dear Tiffany Lightle:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (IS/MND), dated October 2024, 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 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.

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<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.

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

**Project Description:**

The project area is located along Airport Road in Redding, California from Hartnell Avenue to Billy Jean Lane. The Project as described in the ISMND, is as follows:

*“The project would provide two 12-foot wide travel lanes with 8-foot paved shoulders including 3-feet of shoulder backing. A north bound left turn pocket would be constructed at Billy Jean Lane and the southbound right turn pockets at Preserve Boulevard and Argyle Road would be lengthened. The road widening would be intermittent (based on current widths) and vary from 0– 15 feet. Widening would alternate between the east and west sides of the road, and in some locations the road would be widened along both sides. Drainage in the area consists primarily of roadside ditches, with only a few culverts. Relocation of existing ditches would be included with the project. Approximately 125 feet north of Billy Jean Lane an existing One 30-inch diameter and 77-foot long reinforced concrete culvert will be extended 8-feet to the west, and 6-foot concrete flared end sections will be added to the inlet and the outlet.”*

**Comments and Recommendations**

CDFW staff recognize that the City of Redding (Lead Agency) have taken many of the appropriate steps needed to evaluate this Project's impacts to biological resources. CDFW offers the following comments and recommendations to further assist the Lead Agency in adequately identifying, avoiding, and minimizing potentially significant, direct, and indirect impacts on biological resources with the implementation of the Project.

**Wetland and Stream Impacts**

The ISMND indicates approximately 0.001 acre of seasonal wetland, 0.004 acre of fresh emergent wetland, and 0.001 acre of intermittent stream would be

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permanently impacted with the implementation of the Project. Additionally, the ISMND indicates approximately 0.024 acre of non-vegetated ditch would be relocated to accommodate the new width of the roadway and potential indirect impacts may occur due to erosion and sedimentation, accidental fuel leaks, and spills. The ISMND proposed Mitigation Measure 2, for impacts to wetlands which states *"To compensate for direct impacts on potential habitat for vernal pool tadpole shrimp and vernal pool fairy shrimp, the City will purchase the appropriate mitigation credits from a U.S. Fish and Wildlife (USFWS)-approved mitigation bank or another site to be approved by the USFWS. Permanent impacts will be mitigated at a minimum ratio of 3:1 (three acres preserved for each acre of potential habitat removed). Temporary impacts will be mitigated on-site at a 1:1 ratio."*

Vernal pools provide unique wetland habitat for many special status and endemic plant and aquatic wildlife species. The Fish and Game Commission policy regarding wetland resources discourages development or conversion of wetlands that results in any net loss of wetland acreage or habitat value<sup>2</sup>. Habitat conversion, construction, grading, and fill activities within these features also has the potential to impact downstream waters as a result of Project site impacts leading to erosion, scour, and changes in stream morphology. A mitigation ratio of 3:1, or more, begins to address the temporal and functional loss of the wetlands in the Project area, and accounts for the loss of a resource and habitat type that has declined more than 90% throughout California<sup>3</sup>. Therefore, CDFW supports the mitigation ratio at a minimum of 3:1 for the permanent impacts to wetlands in the Project area, and looks forward to reviewing the Lake and Streambed Alteration notification, as noted in the ISMND.

### **Lake and Streambed Alteration Agreement**

Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Substantially divert or obstruct the natural flow of the bed, channel, or bank of any river, stream, or lake; or
- Substantially change or use any material from the bed, channel, or bank of any river, stream, or lake; or

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<sup>2</sup> <https://fgc.ca.gov/About/Policies/Miscellaneous#Wetlands>

<sup>3</sup> <https://wildlife.ca.gov/Conservation/Plants/Vernal-Pools>

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- Deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake.

To obtain information about the 1602 Notification process, please access the [Lake and Streambed Alteration Program](#)<sup>4</sup>.

### **Submitting Data**

CEQA requires that information developed in environmental documents is incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during surveys to the [California Natural Diversity Database](#)<sup>5</sup> (CNDDDB).

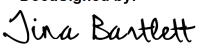
### **Promoting Collaboration**

CDFW is charged with preserving and protecting the state's diverse ecosystems and wildlife; therefore, CDFW maintains a strong commitment to collaborate with other state agencies. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization strategies for the benefit of California's sensitive resources and aligning regulatory frameworks.

### **Conclusion**

CDFW appreciates the opportunity to comment on the ISMND and to assist the Lead Agency in identifying, avoiding, minimizing and mitigating potentially significant Project impacts to biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist) by email at [RICEQARedding@wildlife.ca.gov](mailto:RICEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
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Tina Bartlett, Regional Manager  
Northern Region

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<sup>4</sup> <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

<sup>5</sup> <https://wildlife.ca.gov/Data/CNDDDB>

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

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