



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**



March 28, 2025

David Schlegel  
City of Redding  
Senior Planner  
777 Cypress Avenue  
Redding, CA 96001  
[dschlegel@cityofredding.org](mailto:dschlegel@cityofredding.org)

**SUBJECT: REVIEW OF USE PERMIT S-2021-01590 OASIS SUBDIVISION, CITY OF REDDING, STATE CLEARING HOUSE NUMBER 2025021124**

Dear David Schlegel:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (MND), dated February 27, 2025, 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.

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

---

<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.

David Schlegel  
City of Redding  
March 28, 2025  
Page 2

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:** As described in the combined mitigated negative declaration (MND)-initial study (IS), the Project proposes the following:

*“Subdivision Map Application S-2021-01590, The Oasis Subdivision, submitted by Brian & Sandra Burk et al., proposes to subdivide approximately 48.6 acres in four phases, or units for development of 143 single-family residential lots as well as roadways and other supporting infrastructure. Residential lots would range in size from 7,000 square feet to 22,592 square feet. However, the majority of the lot sizes are within the 7,000-9,000-square-foot range. A road connection from Oasis Road is proposed for Unit 1 and a road connection from Gold Hills Drive, via Pleasant Hills Drive (proposed with the adjoining tentative map for The Reserve at Gold Hills Subdivision S-17-2004/AMND-2020-01539) is proposed for Unit 2. A road connection between Units 1 and 3 to Units 2 and 4 is proposed for a future road connection within the right-of-way through the intervening parcel between the Units 1 and 3 and Units 2 and 4. This connection will provide two points of public-street access for the subdivision. The project includes dedication of right-of-way along the eastern boundary of Units 1 and 3 for the future alignment of Shasta View Drive and dedication of the Dry Gulch Creek corridor along the west boundary of the subdivision as open space for recreational and trail purposes including a dog park.*

*Some off-site improvements are proposed in order to connect sewer infrastructure at the southwest corner of the project site along with a road connection through an adjacent parcel to the north. All street and utility improvements will connect to existing systems located adjacent to the project boundaries. The storm drain system would connect to the Dry Gulch Creek adjacent to the subdivision after any required on-site water treatment.”*

## **Comments and Recommendations**

In March 2022, CDFW responded to an early consultation solicitation from the City of Redding (Lead Agency). CDFW staff have since reviewed the IS and MND with updated attachments.

David Schlegel  
City of Redding  
March 28, 2025  
Page 3

### California Endangered Species Act

This Project has the potential to impact CESA-listed species. Please be advised that a [CESA permit](#)<sup>2</sup> 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).

### Lake and Streambed Alteration Agreement

The MND states, "*Ephemeral streams, approximately 0.1 acres in size, are found throughout the site. [...] Two very small seasonal wetland features [associated with ephemeral streams] were found on the northern and southern section of the site, approximately .005 in size (217.8 square feet). These latter resources would be impacted by development of the Project.*" Additionally, a box culvert and a recreation/dog park are planned for the bed, channel, and bank of Dry Gulch Creek, an intermittent tributary to Salt Creek. Please note that these actions may be subject to Fish and Game Code section 1602, which 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
- 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.

Lake and Streambed Alteration Program staff are available to assist and can be contacted at [r1lsaredding@wildlife.ca.gov](mailto:r1lsaredding@wildlife.ca.gov). To obtain information about the

---

<sup>2</sup> <https://wildlife.ca.gov/Conservation/CESA/Permitting>

David Schlegel  
City of Redding  
March 28, 2025  
Page 4

1602 Notification process, please access the [Lake and Streambed Alteration Program](#)<sup>3</sup>.

### Oaks and Oak Woodlands

Several tree surveys conducted between 2007 and 2022 were included in the IS and MND. The tree surveys are not consistent in the methodologies used for inventorying trees across the Project site, and occur in varying locations throughout the Project site. It is unclear whether the entirety of the Project site, including all roadways and off-site areas (i.e. for the sewer line) were included in the tree surveys. Furthermore, the 2007 surveys, which cover a total of approximately 39.2 acres of the Project site, either only recorded trees with a 24-inch or greater diameter at breast height (DBH) or candidate trees, as defined by Chapter 18.61 of the City of Redding Municipal Code, with one or more of the following attributes:

- “1. It is an outstanding specimen of its species in terms of aesthetic quality as determined by shape and branch structure.*
- 2. It is one of the largest or oldest trees in Redding that also has historical or neighborhood interest.*
- 3. It adds significantly to the environment of the city because of its location, distinct form, unique species, or other identifying characteristics.*
- 4. It is in a location which is connected to a larger natural woodland system, such as a permanent open-space area, and which is likely to be self-supporting over time.*
- 5. It serves a desirable function, such as buffering dissimilar land uses, or is a component of an overall landscape plan”*

As such and considering a 2006 fire affected the attributes of certain trees on the Project site, only 26 trees were recorded across most of the Project site, which, from aerial imagery, contains intact blue oak woodlands and thousands of individual blue oak trees. CDFW considers the 2007 tree surveys to be outdated and not relevant to analyzing biological impacts to habitat quality and ecosystem functions. Even dead oaks and snags provide nesting, roosting, denning, and other habitat values for wildlife, as indicated in Appendix A of the MND.

---

<sup>3</sup> <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

David Schlegel  
City of Redding  
March 28, 2025  
Page 5

In 2022, an additional tree survey was conducted on approximately 8.5 acres of the 48.6-acre Project site for which trees with a DBH of 6-inches or greater were recorded. 593 blue oaks and one gray pine were recorded. Only three blue oaks were identified as "candidate trees", as defined by the City of Redding Tree Ordinance.

Lead Agencies have a responsibility under Section 21083.2 of the California Public Resources Code to consider cumulative impacts to oak woodlands and their significance and have the authority to require mitigation for impacts such as land preservation, enhancement, restoration, and conservation anywhere that is within the general ecological subregion (i.e., within the northern Central Valley).

Blue oak woodland is classified as a State Rank 4 [Sensitive Natural Community](#)<sup>4</sup>, which are at moderate risk of extinction due to restricted range, relatively few populations, low regeneration, overall ecological benefits and their susceptibility to long term climatic changes. The ongoing loss of oak woodlands throughout Shasta County without adequate mitigation is resulting in a cumulative total loss of oak woodlands in our region.

The MND does not offer mitigation measures to alleviate the loss of a still-unknown quantity, but likely hundreds, of blue oaks and intact oak woodland habitat. The only statement addressing the loss of oaks is as follows: "*The Tree Management Ordinance identifies minimum planting criteria of one tree per 500 square feet of gross living area. Thus, with retention of trees in the proposed private open space easements and the planting of new trees as a standard condition of development, the Project is consistent with the intent of the Tree Management Ordinance.*"

The tree surveys provided in the MND do not allow CDFW to adequately assess this Projects potentially significant impacts to oak woodlands. Additionally, while preserving "candidate trees" may satisfy the City of Redding Tree Management Ordinance, proposing their preservation and not proposing mitigation for the approximately 48 acres of permanent removal of oak woodland habitat does not adequately lessen this Projects potentially significant impacts to oak woodland habitat in the City of Redding. CDFW strongly recommends the Lead Agency re-analyze this Project's permanent removal of oak woodlands by explicitly discussing the Projects direct and

---

<sup>4</sup> <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>

David Schlegel  
City of Redding  
March 28, 2025  
Page 6

indirect impacts to oak woodland habitat found onsite. CDFW recommends the Lead Agency consult the [Oak Woodland Impact Decision Matrix](#)<sup>5</sup> for most appropriate mitigation considerations for intact oak woodland impacts. Since comprehensive onsite oak habitat establishment appears infeasible, offsite oak woodland mitigation strategies should be considered as a condition of this Project's approval by the Lead Agency. Oak woodlands may be mitigated by establishing a conservation easement to offset impacts to oak woodlands (acres protected to acres affected at a minimum 3:1 ratio) or contributions to an appropriate compensation fee to an Oak Woodlands Conservation Fund, such as those managed by the [California Wildlife Conservation Board](#)<sup>6</sup>. The goal of mitigation should be to effectively attain no net loss of oak woodland habitat.

Please note that even when retaining mature oak trees, which is an action supported by CDFW, developing between and around the trees permanently alters the values and functions of oak woodland habitat. Development creates the "edge effect" where the natural habitat ends and borders the human-altered, disturbed areas. These edges can result in strong negative impacts detectable within the natural forested or woodland ecosystems. Therefore, woodlands immediately adjacent to development will be impacted and should also be considered as part of the impact area of the Project.

If mitigation for the direct and indirect impacts of oak woodland habitat includes onsite/offsite establishment and/or restoration, the Lead Agency should condition the formulation of a Habitat Restoration Plan, or similar, prior to the approval of land modification, which would explicitly quantify the number of trees to be removed, acres of habitat impacted, trees to be planted, monitoring and success criteria, and any additional onsite/offsite mitigation strategies, to be reviewed and approved by CDFW.

CDFW cannot analyze the potential significance of the Project's impacts to oak woodlands without an inventory disclosing the total number, species, and size of oak trees that cannot be avoided; a quantification of the loss, degradation, and fragmentation of oak woodlands; and a proposal of effective and feasible mitigation of impacts, if determined to be significant. As was commented on during early consultation in 2022, mitigation required must be roughly proportional to the level of impact (including cumulative impacts)

---

<sup>5</sup> [https://docs.vcrma.org/images/pdf/planning/bio/Oak\\_Impact\\_Matrix.pdf](https://docs.vcrma.org/images/pdf/planning/bio/Oak_Impact_Matrix.pdf)

<sup>6</sup> <https://wcb.ca.gov/Programs/Oaks>



David Schlegel  
City of Redding  
March 28, 2025  
Page 7

in accordance with the provisions of CEQA<sup>7</sup> (CEQA Guidelines sections 15126.4(a)(4)(8), 15064, 15065, and 15355). CDFW staff is available to discuss proposed mitigation strategies and ratios.

### Crotch's Bumble Bee

On September 30, 2022, the California Fish and Game Commission accepted a petition to list Crotch's bumble bee (*Bombus crotchii*; CBB) as endangered under CESA, advancing the species to the candidacy stage of the CESA listing process. 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.

An "evaluation of suitable habitat and potential for occurrences for Crotch's bumble bee at Oasis Road S-2021-01590," by Gallaway Enterprises, dated May 31, 2024, was included in the MND. In the opinion of Gallaway Enterprises, "*an on-site species-specific assessment for Crotch's bumble bee is not warranted due to the minimal amount of supporting floristic resources (erogonum) and the lack of recorded occurrences in both proximity and time.*"

CDFW disagrees with the above statement and evaluation provided by Gallaway Enterprises. Gallaway cited CNDDDB in their desktop analysis to report a lack of recorded occurrences, which contributed to their evaluation of Crotch's bumble bee (CBB). Please note that the CNDDDB is a positive sighting database and therefore does not predict where resources may occur. All species with potential to occur, included on database lists or not, should be analyzed for potential impacts from Project implementation. The City of Redding is within the recently updated range for CBB, and CBB thrives in regions that offer an array of flowering plants with suitable nesting sites, such as thatched grasses and small mammal holes. 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

---

<sup>7</sup> The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

David Schlegel  
City of Redding  
March 28, 2025  
Page 8

Project activities. 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.

Due to potentially suitable habitat throughout the Project site and the potential for significant impacts to CBB with the implementation of this Project CBB protocol level surveys should be performed by a qualified biologist in accordance with [June 2023 Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#)<sup>8</sup>.

Please note, conducting protocol-level surveys for CESA-listed species before finalizing an environmental document to ensure an accurate environmental assessment is performed, avoid inadequate mitigation decisions, and comply with CESA regulatory requirements. Surveys will help to identify species presence, preventing potentially costly Project modifications, delays, or the need for CESA permitting. Conducting these surveys upfront supports a comprehensive approval process and minimizes the likelihood of Project revisions.

### Purple Martin

According to the Biological Study Report, purple martin has potential to occur on the Project site. Purple martin (*Progne subis*) is designated as a state species of special concern (SSC) because of substantial declines in its numbers and geographic range. Purple martins are widely but locally distributed in forest and woodland areas at low to intermediate elevations in California<sup>9</sup> (Airola and Williams 2008). Recent review of eBird data shows that scattered populations occur in interior low-to-mid elevation areas of the state.

Purple martins are secondary cavity-nesters that breed colonially in a variety of nesting substrates in California. Most nests are in holes in snags (standing dead trees) and live trees. Habitat suitability is mostly based on the presence of suitable nesting habitat. All suitable nest sites are in open areas that provide flight access.

---

<sup>8</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

<sup>9</sup> Airola, D. A., and B. D. C. Williams. 2008. Purple Martin (*Progne subis*). In: California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California (W. D. Shuford and T. Gardali, eds.), pp. 293–299. Studies of Western Birds 1. Western Field Ornithologists., Camarillo, CA, and California Department of Fish and Game, Sacramento.



David Schlegel  
City of Redding  
March 28, 2025  
Page 9

Since purple martins typically nest colonially and exhibit high site fidelity, the destruction of a nest site could have potentially significant adverse effects. CDFW recommends that a focused survey following [CDFW-approved methodology](#)<sup>10</sup> for purple martin, conducted by a qualified professional, be completed at the appropriate season that immediately precedes Project implementation. If a nest site is located within trees slated for removal, CDFW would propose to consult with the Lead Agency to adopt additional mitigation requirements.

### Redding Checkerbloom and Henderson's bentgrass

ENPLAN's botanical survey details the observations of approximately 900 Redding checkerbloom (*Sidalcea celata*) plants and approximately 100 individual Henderson's bentgrass (*Agrostis hendersonii*) plants within the Project site. Redding checkerbloom and Henderson's bentgrass are listed as California Native Plant Society (CNPS) Rare Plant Rank 3 and 3.2, respectively. For some Rank 3 species, CNPS lacks the necessary information to assign these plants to one of the other ranks or reject them. The 2012 CNPS status review of Redding checkerbloom ranked the species as a 3 not because of taxonomic issues, but because of the uncertainty about its distribution. While there is taxonomic uncertainty about Henderson's bentgrass, results of a phylogenetic study are not yet available and there is reason to believe that Henderson's bentgrass is already extirpated from parts of southern Oregon. Cumulative threats to Henderson's bentgrass include loss of habitat and changes to local hydrology.

The conservation of special status native plants and their habitats, as well as sensitive natural communities, is integral to maintaining biological diversity. CDFW recommends that onsite Redding checkerbloom and Henderson's bentgrass be avoided to the greatest extent feasible. Although, it appears most of the individuals occur in areas of the Project site that are unlikely to be avoided. CDFW therefore recommends that the Lead Agency develop a mitigation strategy for permanent impacts to Redding checkerbloom and Henderson's bentgrass from Project implementation. Mitigation options may include the following:

1. Redesigning the portion of the Project impacting Redding checkerbloom
2. Hiring a qualified biologist to collect and redistribute seeds at the appropriate time of year (this would require the preparation of a mitigation and monitoring plan submitted for CDFW review)

---

<sup>10</sup> <https://journal.wildlife.ca.gov/2024/03/28/survey-methods-for-the-purple-martin-in-california/>

David Schlegel  
City of Redding  
March 28, 2025  
Page 10

3. Purchasing and placing a conservation easement over a parcel of land that has this species present onsite. (Benefits of this approach could include mitigation for Redding checkerbloom, Henderson's bentgrass, and permanent removal of Oak Woodland Habitat, as detailed above)

#### Mitigation Measure Bio-4

Mitigation Measure Bio-4 refers to nesting birds and should be revised in the MND to read as follows:

MM Bio-4. If vegetation removal or construction activities will occur during the nesting season ~~for migratory birds or raptors~~ (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey **no more than** seven days before construction activities begin. **Survey results should be sent to CDFW at [RICEQARedding@wildlife.ca.gov](mailto:RICEQARedding@wildlife.ca.gov).** If nesting birds or raptors are found, California Department of Fish and Wildlife (CDFW) will be notified and consulted. An appropriate buffer, as determined by CDFW and the qualified biologist, will be placed around the nest until the young have fledged. If construction activities cease for a period greater than seven days, additional preconstruction surveys will be required. **If special status species with high site-fidelity are found nesting onsite, additional mitigation may be required.**

#### Mitigation Measure Bio-5

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code § 4150, California Code of Regulations, Section 251.1). Several bat species are also considered Species of Special Concern and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines § 15380). Trees on the Project site that contain cavities, crevices and/or exfoliated bark have high potential to be used as roost sites by various bat species.

Mitigation Measure Bio-5 refers to bats and should read as follows:

MM Bio-5. **If the Project will impact trees or snags with cavities, crevices, and/or exfoliating bark, a thorough survey of the trees should be conducted by a qualified biologist familiar with these features to determine if tree features and habitat elements for bats are present. Trees with features potentially suitable for bat roosting or hibernation should be clearly marked prior to removal.** If construction (including the removal of large trees) occurs during the bat non-volant season (March 1 through August 31), a qualified professional shall conduct a pre-construction survey of the study area to locate maternity

David Schlegel  
City of Redding  
March 28, 2025  
Page 11

colonies and identify measures to protect colonies from disturbance. The preconstruction survey will be performed no more than seven days prior to the implementation of construction activities. If a maternity colony is located within the study area, or adjacent to the study area, a disturbance free buffer shall be established by a qualified professional, in consultation with California Department of Fish and Wildlife (CDFW), to ensure the colony is protected from project activities. **If removal or disturbance of trees identified to have roost structures occurs during anticipated bat hibernacula (November 1 - March 1), humane evictions should be conducted which may vary by year, location, or species, and must be conducted by or under the supervision of a biologist with specific experience conducting exclusions. Humane evictions may consist of a two-day tree removal process whereby on the first day, non-marked trees and brush are removed, along with some of the tree limbs present on trees perceived to provide bat habitat. On the second day, the remainder of the trees and vegetation may be removed. This two-step process changes the microhabitat of the area, which may cause bats to vacate the area under their own volition, therefore minimizing overall impacts to bats.**

#### Native Vegetation in Landscaping

CDFW recommends utilizing native vegetation to the local area in landscaping. Benefits of utilizing native vegetation in landscaping are numerous and include providing vital resources for native wildlife such as hummingbirds and other beneficial pollinators, conserving water, reducing pesticide use, and reducing landscaping maintenance. The [California Native Plant Society \(CNPS\) website](#) 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](#) 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 Protect Native Vegetation from Genetic Degradation](#).

#### Lighting

CDFW recognizes the adverse effects that artificial lighting has on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse effects of artificial light on wildlife,

David Schlegel  
City of Redding  
March 28, 2025  
Page 12

CDFW recommends that lighting fixtures associated with the Project be downward facing, fully shielded, and designed and installed to minimize photo-pollution and spillover of light onto adjacent wildlife habitat.

### Low Impact Development

Development of the Project should ensure that no-net-increase in stormwater runoff results from the Project. CDFW recommends that the Project use Low Impact Development (LID) strategies such as permeable pavement, vegetated stormwater bio-swales and retention basins to treat, retain and infiltrate stormwater runoff on-site. These stormwater facilities and strategies are designed to prevent project-generated stormwater runoff from exceeding that of a 2-year storm event and to protect water quality and manage stormwater as close to its source as possible, thus mitigating potential flooding and pollution problems. Ideally, post-project stormwater run-off volume, rate and duration will match pre-project conditions and no hydromodification will occur as a result of the Project. CDFW supports the use of LID strategies because they minimize impacts to aquatic habitats by filtering out pollution, preventing increased peak flows and related erosion, and because they increase ground water recharge and therefore help maintain biologically important summer low flows in local waterways.

### Wildlife Friendly Fencing

CDFW understands fences are essential for human safety, however, inappropriately designed and/or installed fencing may create serious hazards for wildlife. Therefore, CDFW encourages the Lead Agency to consider designing and constructing perimeter fencing with wildlife friendly fencing techniques to reduce the potential of injury or death. Please consult [A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind](#)<sup>11</sup> 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.

### Submitting Data

CEQA requires that information developed in environmental documents is incorporated into a database which may be used to make subsequent or

---

<sup>11</sup> [https://fwp.mt.gov/binaries/content/assets/fwp/conservation/land-owner-wildlife-resources/a\\_landowners\\_guide\\_to\\_wildlife\\_friendly\\_fences.pdf](https://fwp.mt.gov/binaries/content/assets/fwp/conservation/land-owner-wildlife-resources/a_landowners_guide_to_wildlife_friendly_fences.pdf)

David Schlegel  
City of Redding  
March 28, 2025  
Page 13

supplemental environmental determinations. (Public Resources Code, § 21003, subd. (e).) Accordingly, please report any observation of special status species to the CNDDDB. Use this link to access the [CNNDDB field survey form](#)<sup>12</sup> and this link for additional information on the type of [information reported to CNDDDB](#)<sup>13</sup>. Additionally, a copy of the form should be sent to the Northern Region office at [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).


### **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 government entities. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization for the benefit of California's sensitive resources and aligning regulatory frameworks and appreciates the collaboration thus far.

### **Conclusion**

CDFW appreciates the opportunity to comment on the MND to assist the Lead Agency in identifying and mitigating Project impacts on biological resources. If you have any questions, please contact Helen Bowman, Senior Environmental Scientist (Specialist) by email at [R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
1D82ADE7303A474...

Tina Bartlett, Regional Manager  
Northern Region

ec: Helen Bowman, California Department of Fish and Wildlife  
[R1CEQARedding@wildlife.ca.gov](mailto:R1CEQARedding@wildlife.ca.gov)

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

---

<sup>12</sup> <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

<sup>13</sup> <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>