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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
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August 4, 2025

Danny Castro
Associate Planner
City of Redding
777 Cypress Avenue
Redding, CA 96001
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SUBJECT: Review of Brentwood Village Subdivision and Planned Development, City of Redding, State Clearing House Number 2025070291

Dear Danny Castro:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND), dated July 2, 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[1].

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 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

[1] 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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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, as described in the ISMND, is proposing to subdivide approximately 9.4 acres, into 58 attached single-family residential lots, along with roadways and other supporting infrastructure at the intersection of Sunray Way and Quartz Hill Road (Project) in the City of Redding. The Project site is currently comprised of blue oak-foothill pine and annual grassland habitats.

Comments and Recommendations
In December 2023, CDFW responded to an early consultation solicitation from the City of Redding (Lead Agency), which emphasized performing biological surveys prior to the draft environmental document. CDFW offers the following comments and recommendations to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources.

Crotch's Bumble Bee
As previously stated in CDFW's 2023 communication, 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).

This Project bisects this species' recently updated distribution range. The ISMND states "*After analysis, Gallaway Enterprises concluded that there is no suitable essential habitat for Crotch's bumble bee within the Project area. Floral resources within the grassland habitat are insufficient to support Crotch's bumble bees year-round and no known Crotch's bumble bee food sources were observed during the botanical survey conducted on August 10, 2022. Additionally, the nearest Crotch's bumble bee CNDDB occurrence is approximately 31 miles southeast of the BSA in Red Bluff, and the nearest Bumble Bee Watch sighting is approximately 50 miles southeast of the BSA in Vina. Therefore, an on-site assessment for Crotch's bumble bee is not*

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warranted due to the lack of suitable essential habitat or nearby recorded occurrences."

CDFW does not believe the justification provided accurately represents potentially suitable habitat in the project area or captures why CBB surveys are not warranted because the conclusion that CBB is not expected within the Project area is not adequately supported. The assertion of unsuitable habitat fails to consider that blue oak–foothill pine woodland and grassland habitats, even those with non-native blooming species, can provide seasonally suitable foraging and nesting opportunities, and CBB may forage up to a mile or more from their nest to foraging. The botanical survey conducted in August falls outside the peak bloom period, meaning floral resources may have been present earlier in the season but undetectable at the time of survey. Additionally, the absence of nearby occurrence records in CNDDB and Bumble Bee Watch is not a reliable indicator of absence, as ongoing statewide surveys are identifying new locations for this species, especially in under-sampled areas. Therefore, the analysis does not provide sufficient evidence to rule out the potential presence of CBB, and habitat suitability should be reconsidered using appropriate seasonal surveys and broader ecological criteria.

Without appropriate AMMs, direct mortality and potentially significant indirect impacts associated with ground and vegetation-disturbing activities may occur as a result of Project activities. Due to potentially suitable habitat throughout the Project site and the potential for significant impacts to CBB with the implementation of this Project, 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[2]. For further clarification, Section 4 on Page 3 recommends at least 3 surveys, spaced 2-4 weeks apart during the colony active period, located in Table 1.

Please note, conducting protocol-level surveys for CESA-listed species before finalizing an environmental document is important to ensure an accurate environmental assessment is performed, avoid inadequate mitigation decisions, and accurately 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 prior to Project approval supports a comprehensive approval process and minimizes the likelihood of potentially costly Project revisions. Therefore, CDFW recommends performing bumble bee surveys prior to Project approval.

[2] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline

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Protection of Roosting Bats

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Construction activities, including ground disturbance, vegetation removal, and any activities leading to increased noise levels, may have direct and/or indirect impacts on bats and bat roosts. While a maternity colony is unlikely, removal of these snags and trees should be performed with consideration of roosting bats.

MM Bio-3 includes pre-construction surveys for roosting bats. CDFW advises against performing pre-construction surveys for roosting bats and instead recommends the Lead Agency implements conditions that avoid potential impacts to roosting bats upfront. CDFW recommends revising MM Bio-3 to the following AMMs in the ISMND to adequately avoid impacts to bats protected under Fish and Game Code section 4150:

a) A qualified biologist shall clearly mark snags and live trees that have potential for roosting bats prior to the start of construction activities. Potentially suitable habitat includes snags and lives trees with crevices, exfoliated bark and interstitial spaces.
b) Removal of marked trees should occur only during the following time frames and subject to the following weather conditions, or as otherwise approved/recommended by a qualified bat biologist:
    - Between March 15 and April 30, and between August 15 and October 1; and
    - Between October 2 and March 14 when evening temperatures are above 45°F, and no more than ½" of rainfall within a 24-hour period prior to tree removal.
c) Marked trees shall be removed using a two-step process to allow bats the opportunity to abandon the roost prior to removal. The two-step removal process is as follows:
    - Day 1: Remove small-diameter trees, brush, and non-habitat features of large trees (branches without cavities, crevices, or exfoliating bark) to create noise and vibration disturbance on the tree and to alter the air flow and temperature around the roost feature, thus encouraging bats to vacate roost features on their own. The tree shall then be left for 24 hours to allow the bats to move to another roost site. No excavators, grinders, or other heavy equipment should be used for the first day trimming of bat habitat trees.

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- Day 2: If bats may be in branches that can be removed from the tree and set aside, cut the branches off intact and set them upright against trees away from the Project area to allow any bats present to passively escape. Then, remove the remainder of the tree.

This two-step process changes the microhabitat of the area, causing bats to vacate under their own volition, therefore minimizing direct and indirect impacts to bat species.

Blue Oak Woodlands

The ISMND states "*A tree inventory for the Project site was conducted in August of 2022 by Gallaway Enterprises. The study identified a total of 303 blue oaks and 15 foothill pines that measured over six inches in diameter at breast height (DBH). Each inventoried tree was assigned a health rating of 1 to 5 with 1 being a tree with poor health and 5 being a tree in excellent health. The average health of the trees inventoried was 2, with many of the trees in declining health due to drought. Sixteen of the trees over six inches DBH are proposed to be preserved, with 302 to be removed. City staff have not identified any candidate trees with the potential to be preserved, and the removal of trees is permitted with an approved grading or building permit.*"

Blue oak woodland is classified as a State Rank 4 Sensitive Natural Community[3], 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. While State Rank 4 communities are less rare, they are still of ecological importance and the impacts to State Rank 4 communities can still be significant under certain circumstances, especially when considering local ecological contexts and cumulative environmental impacts, such as those ongoing with continued development throughout the City of Redding.

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. This impact not only equates to loss of oak habitat, but also cumulatively impacts the numerous and abundant wildlife and botanical resources reliant on this natural community. This habitat provides many important ecosystem functions to our community by providing habitat for wildlife, moderating temperature extremes, reducing soil erosion, and sustaining water quality. In California, oak woodlands have the greatest wildlife species

[3] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities

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richness of any other habitat in the state, with over 330 species of amphibians, birds, and mammals relying upon these habitats at some point during their lives.

CDFW strongly recommends the Lead Agency consult the Oak Woodland Impact Decision Matrix[4] for most appropriate mitigation considerations for this Project's permanent oak woodland impacts. This analysis should be included as part of the draft environmental document.

Since comprehensive onsite oak woodland habitat establishment appears infeasible within the proposed Project area, 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[5]. The goal of mitigation should be to effectively attain no net loss of oak woodland habitat.

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. Oak trees should be replaced at the following mitigation to impact ratios:
Oak trees:

- 1:1 replacement for trees up to 3 inches DBH
- 4:1 replacement for trees greater than 3 inches and up to 7 inches DBH
- 5:1 replacement for trees greater than 7 inches and up to 15 inches DBH
- 10:1 replacement for trees greater than 15 inches DBH, which are considered old-growth oaks.

Non-oak trees:

- 1:1 replacement for non-native trees
- 1:1 replacement for native trees up to 3 inches DBH
- 3:1 replacement for trees greater than 3 inches DBH and up to 6 inches DBH

[4] https://docs.vcrma.org/images/pdf/planning/bio/Oak_Impact_Matrix.pdf
[5] https://wcb.ca.gov/Programs/Oaks

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- 6:1 replacement for trees greater than 15 inches DBH.

Native Vegetation in Landscaping

The ISMND states "*While many trees are proposed for removal, the Project anticipates the installation of approximately 326 new trees*." Without a conservation-oriented tree ordinance to protect native oak habitats, to ensure mitigation for the removal of these trees and the habitat they create, replacement of these trees with ornamental non-natives (e.g. redwoods, palm trees, crape myrtle, liquid amber etc:) especially in new subdivisions and developments, should not be considered mitigation. CDFW strongly recommends the Lead Agency to condition this Project to landscape with vegetation native to the regional area only, with an emphasis on replacing some of the 300+ blue oak trees this Project plans to remove.

Benefits of utilizing native vegetation in landscaping are numerous and include providing vital resources for native beneficial pollinators, conserving water, reducing pesticide use, reducing landscaping maintenance and following California's water efficient landscape ordinance. 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[6] generates a list of native plants that grow in an area based on a specific address and can be used to develop a planting palate for landscaping plans. For more information regarding the importance of using native species in landscaping, please refer to the CNPS Guidelines for Landscaping to Protect Native Vegetation from Genetic Degradation.

Lake and Streambed Alteration Agreement

The ISMND states "*Riverine habitat occurs onsite in the form of a manmade channel that is characterized by ephemeral flows which run south to north through the site. This drainage is heavily vegetated and likely only provides aquatic habitat when it is flowing immediately after precipitation events.*"

Please note that Project activities 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:

[6] https://calscape.org/

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- 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. To obtain information about the 1602 Notification process, please access the Lake and Streambed Alteration Program[7].

California Endangered Species Act
This Project has the potential to impact CESA-listed species, including CBB. Please be advised that a CESA permit[8] 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).

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. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any observation of special status species to the California Natural Diversity Database(CNDDB). Use this link to access the CNNDB field survey form[9] and this link for additional information on the type of information reported to CNDDB[10]. Additionally, a copy of the form should be sent to the Northern Region office at R1CEQARedding@wildlife.ca.gov.

[7] https://wildlife.ca.gov/Conservation/Environmental-Review/LSA
[8] https://wildlife.ca.gov/Conservation/CESA/Permitting
[9] https://nrm.dfg.ca.gov/fieldSurvey/default.aspx
[10] https://wildlife.ca.gov/Data/CNDDB/Submitting-Data

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Environmental Document Filing Fees
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. 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. Payment of the environmental document filing fee is required in order for the 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 collaborating with local government entities. CDFW looks forward to continuing collaboration with the Lead Agency to implement comprehensive avoidance and minimization for the benefit of California's sensitive resources and aligning our regulatory frameworks.

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 Erika Iacona, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Tina Bartlett
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Tina Bartlett, Regional Manager
Northern Region

ec: Erika Iacona, California Department of Fish and Wildlife
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