



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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September 25, 2025

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SUBJECT: Review of California Heritage YouthBuild Academy Project, Planned Development Plan Application PD-2025-00230, City of Redding, State Clearing House Number 2025090622

Dear Danny Castro:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND), dated September 2025, for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & 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

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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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, as it is described in the ISMND is as follows:

“The Project applicant, California Heritage YouthBuild Academy (CHYBA), is requesting approval of Planned Development Plan Application PD-2025-00230 to construct a new public charter high school campus for CHYBA on a 10.15-acre site located at 1400 Industrial Street. The campus would include a 36,600 square foot building consisting of classrooms, administrative offices, a dining area, and an indoor gymnasium with bleachers. Site amenities would include pedestrian walkways, parking areas, drop-off zones, a soccer field, and an outdoor basketball court. Construction of the facility would necessitate frontage improvements and right-of-way dedication to the City as well as the off-site construction of an Industrial Street crossing over Little Churn Creek. Although the Industrial Street crossing would be required with this Project, it was previously studied with and incorporated into the adopted Mitigated Negative Declaration (State Clearing House Number 2023060613) of another project nearby.

The site is moderately sloped with an elevation of 590 feet in the northeast corner transitioning smoothly down to an elevation of 554 feet in the southwest corner. Grading would largely consist of creating a “super pad” that would act as a large flat step in the middle of the site, creating a more ideal topography for the development of the campus. All necessary public utilities such as sewer, water, and electricity are in close proximity to the site and available for connection to the Project.”

Biological Setting:

The Project is located at Assessor Parcel Number 067-110-041 in central Redding, within 1 mile east of the Sacramento River, in a developed area known as “Mistletoe”. Little Churn Creek runs along the western parcel boundary, a tributary to Churn Creek, a tributary to the upper Sacramento River in the northern Sacramento Valley. Development nearly surrounds the parcel, on three and a half of the four parcel boundaries. The regional landscape is a patchwork of urban/suburban development, valley foothill oak

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woodland, annual grassland, and riparian/riverine habitats associated with Little Churn Creek.

Little Churn Creek is a 1.5-mile-long intermittent tributary of Churn Creek, located in Shasta County, California. As an intermittent stream, Little Churn Creek typically flows for more than three months each year, often during the wetter months. Portions of Little Churn Creek are lined with concrete. This urbanized section of the creek runs through areas where development has altered the natural landscape, leading to the installation of concrete channels to manage stormwater and prevent flooding and known to be regularly maintained by the City of Redding. Little Churn Creek is considered a "relatively permanent" water feature by the U.S. Army Corps of Engineers due to its consistent seasonal flow. The creek may support diverse riparian habitats and is home to various species, including migratory birds, Northwestern pond turtle (*Actinemys marmorata*, State Species of Special Concern [SSC]) and steelhead trout (*Oncorhynchus mykiss irideus* pop. 11, SSC).

Comments and Recommendations

CDFW offers the following comments and recommendations to 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.

Biological Assessment

The ISMND references a Biological Assessment (BA) and Wetland Determination, written in September 2024, stating biological assessments of the Project area were conducted in August and September of 2024.

Page 5 of the BA references the use of the California Natural Diversity Database (CNDDDB) for the Project's biological analysis. However, the BA does not present any species queried from the CNDDDB, nor are any state special status species incorporated into the determination of effects in Table 1. Table 1 appears to only consider federally listed and/or special status species, some of which are dually listed (state and federal listings) also not detailed in the table. A CNDDDB query within a 1-mile radius of the Project area identifies six "features" or observations of species with potential to occur, while a 2-mile radius query identifies 23 features. While most of the queried species have low or no potential to occur in the Project area, species with potential to occur adjacent to the Project area should be included in a revised BA for potential direct and indirect impacts from Project activities. CDFW recommends

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amending the BA to better inform this Projects' potential impacts to state special status and sensitive species.

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 thoroughly analyzed for potential impacts from Project implementation.

Crotch's Bumble Bee

The BA does not include an analysis of potentially occurring CESA-listed bumble bees. On September 30, 2022, the California Fish and Game Commission accepted a petition to list Crotch's bumble bee (*Bombus crotchii*, CBB) 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).

CBB may inhabit diverse habitats including woodlands, grasslands, shrublands, agricultural lands and urban landscapes. Without assessment, and appropriate avoidance and minimization measures, potentially significant impacts to CBB may occur with the implementation of this Project.

Since this Project bisects the range of CBB, and the Project area appears to contain potentially suitable onsite habitat, CDFW recommends a CBB habitat assessment is performed by a qualified biologist and included in an amended BA and final ISMND. If the habitat assessment concludes the Project area has potentially suitable CBB, avoidance and minimization measures should be employed to avoid potential impacts in accordance with CDFW's [June 2023 Survey Considerations for California Endangered Species Act \(CESA\) Candidate Bumble Bee Species](#)².

Bio-1 Protection of Nesting Birds

While CDFW staff are pleased to see the ISMND considers potential impacts to nesting birds, the avoidance and minimization measure, Bio-1, uses the verbiage "if feasible". To adequately avoid impacts to nesting birds, protected under Fish & Game Code Sections 3503 and 3503.5 and the federal Migratory

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

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Bird Treaty Act, the following avoidance and minimization measures should be implemented, notwithstanding feasibility:

- a) *Vegetation removal, land modification and ground-disturbing activities should occur between September 1 and January 31, when birds are not anticipated to be nesting.*
- b) *If vegetation removal, land modification and ground disturbing activities must occur during the nesting season, a pre-construction nesting bird survey should be conducted by a qualified biologist to identify active nests in and adjacent to the Project area.*

Pre-construction nesting bird surveys should begin prior to sunrise and continue until vegetation and nests have been sufficiently observed. The survey should consider acoustic impacts and line of sight Project disturbances to determine a sufficient survey radius to maximize observations of nesting birds. A nesting bird survey report should be prepared and, at a minimum, the report should include a description of the area surveyed, date and time of the survey, ambient conditions, bird species observed, a description of any active nests observed, any evidence of breeding behaviors (e.g., courtship, carrying nest materials or food, etc.), and a description of any outstanding conditions that may have impacted the survey results (e.g., weather conditions, excess noise, presence of predators).

If an active nest is located during pre-construction surveys, a non-disturbance buffer should be established around the nest by a qualified biologist in consultation with CDFW and U.S. Fish and Wildlife Service to comply with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists.

Nesting bird surveys should be conducted no more than one week prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction nesting bird survey, the site should be resurveyed.

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Bio-2: Avoidance and Protection of 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. Trees that contain cavities, crevices, or exfoliated bark have high potential to be used by various bat species.

While CDFW staff are pleased to see the ISMND considers potential impacts to bats, the avoidance and minimization measure, Bio-2, appears to only consider impacts to maternity roosts and does not consider impacts to individual roosting bats. CDFW recommends including a pre-construction survey by a qualified biologist to identify and mark trees slated for removal within the Project area that contain suitable bat roosting habitat features before tree removal occurs, and to include a two-step removal process to further reduce the risk of impacts to bats.

CDFW recommends incorporating the following revisions into Bio-2 to more adequately avoid this Projects potential impacts to bats:

Bio-2: A qualified biologist shall perform a pre-construction visual inspection of trees larger than 10" diameter at breast height (DBH) to identify and clearly mark trees that have potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). Removal of marked trees should be performed in accordance with the following methods:

1. *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 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.*

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2. *Marked trees shall be removed using a two-step process to allow individually roosting bats the opportunity to abandon the roost prior to removal. The two-step removal process is as follows:*
 - o *Day 1: Remove small-diameter trees, brush, and non-habitat features of marked trees (branches without cavities, crevices, or exfoliating bark) to alter existing conditions around the roost thus encouraging bats to vacate the roost on their own. The tree shall then be left for 24 hours to allow the bats to move to another roost site.*
 - o *Day 2: If bats are thought to be in marked tree branches that can successfully be removed 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.*

If construction (including the removal of large trees) must occur outside of the above time frames, a qualified biologist shall conduct a preconstruction survey of the project area to locate maternity colonies and identify measures to protect the colonies from disturbance. The preconstruction survey will be performed no more than seven days prior to the implementation of construction activities. If a lapse in construction activities for seven days or longer occurs between those dates, another preconstruction survey will be performed. If a maternity colony is found a qualified biologist (in consultation with the CDFW) will determine the extent of a construction-free buffer zone to be established around the nest. If practicable, removal of large trees with cavities will occur before maternity colonies form (i.e., prior to March 1) or after young are capable of flying (i.e., after August 15).

Oak Woodlands

A Tree Inventory was included as part of the Project's analysis, framing impacts to onsite trees primarily through the lens of the City of Redding Tree Ordinance. However, neither the BA nor the Tree Inventory addresses the Project's impacts to Blue Oak Woodland as a habitat type. Blue Oak Woodland is classified as a State Rank 4 [Sensitive Natural Community](#)³, considered at moderate risk of extinction due to its restricted range, limited populations, low regeneration rates, important ecological functions, and vulnerability to long-term climatic changes. Although State Rank 4 communities are more common than those of

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

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higher ranks, they remain ecologically significant. Impacts to these communities can be substantial, particularly when evaluated within the local ecological context and in light of cumulative impacts from ongoing development in 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 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 (CalPIF 2002).

This Project proposes permanently removing 173 blue oaks, 111 gray pines, 7 interior live oaks, and 2 black oaks, with an average Diameter at Breast Height (DBH) of 14.1 inches. A 14-inch DBH blue oak could be anywhere from 50 to 120+ years old, depending on site productivity⁴. Considering this Project will permanently remove 293 trees, some of the last remaining in this block of Mistletoe, CDFW strongly recommends the Lead Agency consult the [Oak Woodland Impact Decision Matrix](#)⁵ for most appropriate mitigation considerations for this Project's permanent oak woodland impacts. This matrix considers intact and degradation site conditions. CDFW anticipates this analysis to be included as part of the amended BA and final environmental document.

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

⁴ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=67340&inline>

⁵ https://docs.vcrma.org/images/pdf/planning/bio/Oak_Impact_Matrix.pdf

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

Since tree preservation and/or comprehensive onsite oak woodland habitat establishment appears infeasible within the proposed Project area, and the proposal of planting approximately 100 non-native trees onsite does not offset this Project's impacts to oak woodland habitat, 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](#)⁶. The goal of mitigation should be to effectively attain no net loss of oak woodland habitat.

Proposed Landscape Plan

The Plant Schedule provided for the Project includes approximately 34 species (Attachment A3). Of these, six species are native to California (*Achillea millefolium*, *Cercis occidentalis*, *Festuca idahoensis*, *Lupinus arboreus*, *Quercus douglasii*, and *Sequoia sempervirens*), 26 are non-native ornamentals that are not known to be invasive, and two are considered invasive or problematic in California (*Nandina domestica* (Heavenly Bamboo) and *Lantana montevidensis* (Trailing Lantana)). While many of the proposed species may be considered drought-tolerant (e.g., *Arbutus unedo*, *Perovskia atriplicifolia*, *Cercis occidentalis*), others raise concerns. Specifically, coast redwood (*Sequoia sempervirens*) is poorly adapted to Redding's high summer temperatures and will require excessive irrigation to survive. In addition, the use of toxic species such as *Nandina domestica* and *Lantana montevidensis* [may pose a threat for](#)

⁶ <https://wcb.ca.gov/Programs/Oaks>

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[locally occurring wildlife](#)⁷. The planting palette would benefit from replacement of these species with locally adapted California natives that provide habitat value while reducing long-term irrigation demands.

CDFW recommends conditioning the use of native vegetation to the local area in residential development landscaping and the revision of the proposed Plant Schedule. 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](#).

California Endangered Species Act

Please be advised that a [CESA Incidental Take 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 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

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

⁷ <https://vet.uga.edu/toxicity-due-to-nandina-domestica-in-cedar-waxwings-bombycilla-cedroru/>

⁸ <https://wildlife.ca.gov/Conservation/CESA/Permitting>

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- 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.

To obtain information about the 1602 Notification process, please access the [Lake and Streambed Alteration Program](#)⁹.

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 [CNDDDB](#)¹⁰.

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 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. Please consider consulting with CDFW staff to further discuss how we can conserve Redding's unique habitats, particularly oak woodlands.

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 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.)

Conclusion

CDFW appreciates the opportunity to comment on the MND and to assist the Lead Agency in identifying, avoiding, minimizing, and mitigating potentially


⁹ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

¹⁰ <https://wildlife.ca.gov/Data/CNDDDB>

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significant 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:

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Tina Bartlett, Regional Manager
Northern Region

cc: Erika Iacona
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