



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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November 6, 2025

Don Renz
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SUBJECT: Old Shasta County Courthouse Demolition Project, Notice of Preparation of Draft Environmental Impact Report, State Clearing House Number 2025100575

Dear Don Renz:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) and Initial Study dated October 2025 for a 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) 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; 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 (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 will be required.

PROJECT DESCRIPTION SUMMARY

Lead Agency: Shasta County

Location: The Project area is located at 1500 Court Street in downtown Redding and is bounded by Butte Street on the north, Yuba Street on the south and West Street on the west.

Objective: Shasta County is proposing hazardous materials abatement, site preparation, building demolition, parking lot construction, and site restoration. Following demolition of the buildings, the site would be redeveloped as a public parking lot providing 162 stalls, including 157 regular stalls, four Americans with Disabilities Act (ADA) accessible stalls, and one van accessible stall (approximately 75,00 square feet). The redeveloped site would also maintain 34,500 square feet of existing landscaping and would preserve four existing veterans' memorial monuments on the site. Direct vehicle ingress and egress to the parking lot would be provided from West Street. Existing paved walkways providing pedestrian access to the surrounding streets would be preserved.

Biological Setting: The Project area is located in urbanized downtown Redding. Properties surrounding the Project area include Shasta County government buildings, court facilities, law offices and residential uses. Potentially occurring biological resources include, but are not limited to, nesting migratory birds and bats.

General Comments and Recommendations

CDFW offers the following comments and recommendations to assist the Lead Agency in adequately identifying, avoiding, minimizing and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on biological resources.

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1. Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary for CDFW to provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to impacted biological resources (e.g., current range, distribution, population trends, and connectivity).
2. Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information is included in the DEIR.
 - a. A complete discussion of the purpose and need for, and description, of the proposed Project.
 - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the Lead Agency select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the Lead Agency consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.
 - c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).
 - d. Where the Project may impact aquatic and riparian resources, CDFW recommends the Lead Agency select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also

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recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities.

3. Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information.
 - a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect sensitive resources.
 - b. A complete and recent assessment of the biological resources associated with each habitat type in the Project area and within adjacent areas. A full literature review includes but is not limited to CDFW's [California Natural Diversity Database](https://wildlife.ca.gov/Data/CNDDDB)² (CNDDDB) and other reliable biological resource databases (U.S. Fish and Wildlife Service IPaC, California Native Plant Society, California Bumble Bee Watch, eBird, iNaturalist). Such databases should be accessed to obtain current information on any previously reported sensitive species and habitat. 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.
 - c. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project area and

² <https://wildlife.ca.gov/Data/CNDDDB>

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- adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See [CDFW's Survey and Monitoring Protocols and Guidelines](#)³ for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.
- d. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
4. Direct and Indirect Impacts on Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological resources with specific measures to offset such impacts. The DEIR should address the following:
- a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)).
 - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, § 15126.2(a)).

³ <https://wildlife.ca.gov/conservation/survey-protocols>

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- c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.
 - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.
 - e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
5. Cumulative Impact. Cumulative impacts on biological resources can result significant impacts from collective projects which may be individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare, or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (Pub. Resources Code, § 21083(b)). The Lead Agency conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if the Lead Agency concludes that the Project would not result in cumulative impacts on biological resources, the Lead Agency, "shall identify facts and analysis supporting the Lead Agency's conclusion that

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the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

6. Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be considered and discussed in detail. If on-site mitigation is not feasible or would not be biologically viable, therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.

Specific Comments and Recommendations

1. Nesting Birds. The Project area has suitable habitat for nesting birds. To avoid impacts to nesting birds protected under Fish and Game Code Sections 3503 and 3503.5 and the federal Migratory Bird Treaty Act, one of the following should be implemented:
 - a. Vegetation removal, ground disturbing activities and structure demolition should occur between September 1 and January 31, when birds are not anticipated to be nesting; or
 - b. If vegetation removal, ground disturbing activities or structure demolition 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.

Surveys should begin prior to sunrise and continue until vegetation and other nesting structures have been thoroughly 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

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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 United States Fish and Wildlife Service to comply with Fish and 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 seven days prior to the initiation of construction. If construction activities are delayed or suspended for more than seven days after the pre-construction nesting bird survey, the site should be resurveyed.”

2. Bats. Several California bat species are known to utilize human-made structures for short term roosting, hibernation and maternity roosts; those occurring in Redding include, but are not limited to, big brown bat (*Eptesicus fuscus*), yuma myotis (*Myotis yumanensis*), California myotis (*Myotis californicus*) and Brazilian freetail bat (*Tadarida brasiliensis*). 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, § 251.1).

Due to potentially suitable habitat for bats, prior to any building demolition or other activities that may harm or harass bats, the following measures shall be implemented to avoid and minimize impacts to bats:

- a. Habitat Assessment: A qualified biologist experienced with bat habitat and surveys shall conduct a habitat assessment of the structures proposed for demolition to identify features suitable for bat roosting (e.g., crevices, attics, eaves, expansion joints, or loose flashing).
- b. Bat Surveys: If suitable roosting habitat is identified, a qualified bat biologist shall conduct presence/absence surveys. Surveys shall be conducted no less than 14 days prior to demolition, although surveys

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would ideally be completed before the DEIR is posted to apply the most appropriate avoidance and minimization measures.

c. Seasonal Restrictions:

- i. If active maternity roosts are present (generally May 1 through August 31), demolition shall be postponed until young have dispersed, as determined by the qualified bat biologist.
- ii. If hibernation roosts are present (generally November 1 through March 31), demolition shall be postponed until bats have naturally aroused and departed.

d. Passive Exclusion (if applicable): If non-maternity roosting bats are detected and must be excluded, a qualified bat biologist may implement a CDFW-approved passive exclusion (e.g., installation of one-way devices) outside of maternity or hibernation periods. Exclusion devices shall remain in place for a minimum of 5 consecutive warm nights to ensure all bats have vacated before demolition. (A "warm night" is defined as a night when ambient air temperatures remain above 45°F (7°C) for at least four consecutive hours after sunset, with no precipitation and low wind (<10 mph). These conditions are considered suitable for bat activity and allow adequate opportunity for roosting bats to emerge and relocate following installation of exclusion devices⁴⁵⁶)

e. Monitoring and Reporting: The qualified biologist shall monitor exclusion and demolition activities to ensure compliance with these measures. A brief post-demolition report shall be submitted to the lead agency documenting methods, findings, and any exclusion or relocation efforts.

f. Bats Found During Demolition: If bats are discovered during demolition, work shall halt immediately in the vicinity of the roost, and CDFW shall be consulted to determine appropriate next steps.

3. Landscaping. CDFW recommends the Lead Agency provide a native plant palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project area (e.g., introducing non-native, invasive species). CDFW encourages landscaping with

⁴ California Department of Fish and Wildlife (CDFW). 2019. A Guide to the Study of Bats in California.

⁵ Miner, K.L., and D.L. Stokes. 2005. Bats and Bridges Technical Bulletin. California Department of Transportation, Sacramento, CA.

⁶ Western Bat Working Group (WBWG). 2018. Bat Survey Guidelines, Western United States.

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vegetation native to the local area. 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](https://calscape.org/)⁷ 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 refer to the CNPS Guidelines for Landscaping to Protect Native Vegetation from Genetic Degradation.

4. Low Impact Development. CDFW recommends the implementation of [Low Impact Development](https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/)⁸ (LID) strategies to prevent a net-increase in stormwater runoff from new development and parking areas. LID strategies may include permeable pavement, vegetated stormwater bio-swales and retention basins to treat, retain and infiltrate stormwater runoff on-site. These LID strategies are typically designed to prevent project generated stormwater runoff from exceeding that of a 100-year storm event, to protect water quality and manage stormwater as close to its source as possible, thus mitigating potential for outflow of toxic pollutants such as 6PPD-quinone, a chemical contaminant derived from vehicle tires, suspected to negatively impact aquatic organisms. Ideally, post project stormwater runoff volume, rate and duration will match pre-project conditions and hydro modification would not occur as a result of the Project. CDFW supports the use of LID strategies because they minimize impacts to aquatic habitats by filtering out pollutants, decrease peak flows, minimize erosion, and increase ground water recharge.

Environmental Data

CEQA requires that information developed in environmental impact reports and negative declarations be 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

⁷ <https://calscape.org/>

⁸ https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

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special status species and natural communities detected during Project surveys to the CNDDDB using the [CNDDDB field survey form](#)⁹. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

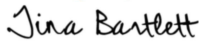
Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and an assessment of 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 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 NOP to assist the Lead Agency in identifying potential Project impacts on biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist, by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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⁹ http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf