



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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Northern Region
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March 2, 2026

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Subject: Review of City of Redding Riverfront Specific Plan, Notice of Preparation of Draft Environmental Impact Report, State Clearing House Number 202601122

Dear Jeremy Pagan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) 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 and 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.

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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CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, to the extent implementation of the Project as proposed may result in “take” as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish and G. Code, § 2050 et seq.) or state listed rare plants pursuant to the Native Plant Protection Act (NPPA; Fish and G. Code § 1900 et seq.), authorization as provided by the applicable Fish and Game Code will be required.

Project Summary

Proponent: City of Redding

Objective: City of Redding, as Lead Agency, proposes to prepare a Draft Environmental Document to evaluate the environmental impacts associated with conceptual plans projected under the revised Redding Riverfront Specific Plan.

Project Description: According to the Redding Riverfront Specific Plan website², “A Redding Riverfront Specific Plan will become a planning document used by the City and community to implement the broader direction of the Redding General Plan 2045. Once adopted by the City Council, it will include a vision and guiding principles for the area supported by a series of specific policies, development standards and programs unique to the riverfront area. This includes a land use plan for the location and intensity of uses; an implementation strategy; public infrastructure required to serve the area; and capital projects and infrastructure funding options necessary to implement the plan.”

According to the NOP, the DEIR “will not evaluate detailed, site-specific activities and future site-specific projects that may be developed under the Specific Plan.”

Biological Setting: The Redding Riverfront Specific Plan (RRSP) encompasses approximately 418 acres along three miles of the Sacramento River within the City of Redding (Plan Area). The Plan Area supports a diverse mosaic of

² <https://www.reddingriverfront.org/about-the-project>

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habitats, including sensitive riparian communities such as Great Valley Cottonwood Riparian Forest, Great Valley Mixed Riparian Forest, Great Valley Riparian Scrub, and Valley Oak Riparian Forest. These habitats provide critical ecological functions and support numerous wildlife species. The area lies within the Stillwater–Churn Creek watershed and is part of the Pacific Flyway, providing important migratory bird habitat. According to Redding Municipal Code 7.24, Turtle Bay is designated as a ‘wild bird sanctuary’, with over 195 bird species documented in the vicinity³.

The Sacramento River within the Plan Area is used by multiple CESA-listed and federal Endangered Species Act-listed (ESA) species, including Central Valley steelhead trout (*Oncorhynchus mykiss*, state Species of Special Concern [SSC] and ESA Threatened), winter-run Chinook Salmon (*Oncorhynchus tshawytscha*, CESA and ESA Endangered), Central Valley fall/late fall-run Chinook Salmon (SSC), spring-run Chinook Salmon (*Oncorhynchus tshawytscha*, CESA and ESA Threatened), and green sturgeon (*Acipenser medirostris*, Southern Distinct Population Segment, SSC and ESA Threatened) and is mapped as both Designated Critical Habitat and Essential Fish Habitat for Chinook Salmon.

Riparian forests within the Plan Area provide nesting habitat for special-status birds including, but not limited to, bald eagle (*Haliaeetus leucocephalus*, CESA Endangered), osprey (*Pandion haliaetus*), and yellow warbler (*Setophaga petechia*, SSC); offer roosting habitat for bats like the western red bat (*Lasiurus blossevillii*, SSC); and likely supports up to 1,000 pollinator species including a variety of butterflies, native bees, moths, syrphid flies, beetles, wasps and hummingbirds. River-adjacent wetlands and ponds support countless resident and migratory waterbirds and western pond turtle (*Actinemys marmorata*, SSC); and the riparian corridors offer connectivity for terrestrial species like ringtail (*Bassariscus astutus*, state Fully Protected) and mule deer (*Odocoileus hemionus*).

Comments and Recommendations

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

³ <https://ebird.org/>

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the formulation and implementation of the Redding Riverfront Specific Plan (RRSP).

To enable CDFW to provide adequate and meaningful CEQA review, please ensure the DEIR discloses all potentially significant impacts and includes feasible, effective, and enforceable mitigation measures implemented through legally binding instruments (PRC §21081.6(b); CEQA Guidelines §§15126.4, 15041, 15097). Mitigation measures should specify responsible parties, timing, actions, and monitoring to ensure compliance with a Mitigation Monitoring and Reporting Program (MMRP).

1) **DEIR Biological Resource Assessment**

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. The DEIR should include a complete biological resource assessment of the Plan Area, to contain:

- a. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment of where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- b. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. Known occurrences of rare, threatened, endangered, and other sensitive species within the Plan Area. Consult

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CNDDDB and Rarefind. Publicly available databases may also be useful for expert-verified observations (e.g., iNaturalist, Bumble Bee Watch, eBird). Include California Species of Special Concern and Fully Protected species (Fish & Game Code §§3511, 4700, 5050, 5515). Identify and evaluate the Plan Area for rare, threatened, endangered species, Species of Special Concern, and Fully Protected species (FGC §§3511, 4700, 5050, 5515). Seasonal habitat should be considered and addressed. See CDFW's *Survey and Monitoring Protocols and Guidelines*⁴ for established survey protocol for select species.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it holds, nor is it an absence-identifying database. CDFW recommends that CNDDDB be used as a starting point in gathering information about the potential presence of species within the Plan Area, however all species known to occur in the Plan Area should be considered and evaluated, even if they do not show up on CNDDDB.

- c. Mapped Sensitive Natural Communities (S1-S4 ranks) and/or rare plant communities that occur throughout the Plan Area. Please visit Vegetation Classification and Mapping Program⁵, Manual of California Vegetation⁶ and the California Native Plant Society Inventory of Rare Plants⁷.

2) **DEIR Impact Analysis**

Consistent with CEQA Guidelines sections 15126.2 and 15130, the DEIR should analyze the following potential impacts of the Project on biological resources, in addition to including avoidance and minimization measures, and compensatory mitigation for significant, or potentially significant, impacts.

- a. A discussion of potential impacts from lighting, noise, human activity (e.g., recreation, regularly/annually occurring events), defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural

⁴ <https://wildlife.ca.gov/Conservation/Survey-Protocols>

⁵ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

⁶ <https://vegetation.cnps.org/>

⁷ <https://rareplants.cnps.org/Search/Advanced>

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areas, exotic and/or invasive species, and drainage. The latter subject should address Project related changes on drainage patterns and water quality within, upstream, and downstream of the Project site, including volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.

- b. With respect to defensible space: please ensure that the DEIR fully describes and identifies the location, acreage, and composition of defensible space within the proposed Project footprint. Please ensure that any graphics and descriptions of defensible space associated with this project comply with the appropriate agency, (e.g., City of Redding Fire, Cal Fire) regulations/ requirements. The Lead Agency, through its planning processes, should ensure that defensible space is provided and accounted for within proposed development areas, and not transferred to adjacent open space or conservations lands. CDFW requests that the DEIR clearly identify: (1) if lands are being proposed as mitigation to offset impacts associated with the project; and (2) if these lands are also proposed to serve as defensible space. Please note that lands proposed to be managed for defensible space purposes will have lower conservation resource value as they require in-perpetuity vegetation management.
- c. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands, open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

Please note that the Project area supports substantial biological resources and contains habitat connections, providing for wildlife movement across the broader landscape, sustaining both transitory and permanent wildlife populations. CDFW encourages project design that avoids and preserves onsite features that contribute to habitat connectivity. The DEIR should include a discussion of both direct and indirect impacts to wildlife movement and connectivity, including

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maintenance of wildlife corridor/movement areas to adjacent undisturbed habitats.

- d. An evaluation of impacts to adjacent open space lands from both the construction of the Project and any long-term operational and maintenance needs.
- e. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The DEIR should analyze the cumulative effects of the plan's land use designations, policies and programs on the environment. Please include all potential direct and indirect Project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

3) **Considerations for Redding's Riverfront Specific Plan**

The following information is pertinent in the formulation of a comprehensive DEIR, and the functionality and effectiveness of RRSP in relation to biological resources.

- a. Controlled Recreational Access
Recreational access points along the Sacramento River within the Plan Area should be comprehensively considered for designation and managed to balance public enjoyment with ecological protection and regulatory compliance. CDFW strongly recommends the Lead Agency design recreational river access points and activities to minimize impacts on riparian habitats, sensitive wildlife species, salmonid spawning and rearing habitat, and water quality. Strategies may include designated entry areas, seasonal restrictions to protect fish spawning and/or nesting periods, erosion control measures, and appropriately placed and well-maintained interpretive signage to educate visitors on responsible recreation.

Coordination with local stakeholders, enforcement of existing City-wide

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and state regulations, and adaptive management practices will ensure that recreational use remains sustainable with minimal impact on biological resources. Additionally, the Lead Agency should implement a structured monitoring program that includes regular water quality testing, habitat condition assessments, and wildlife population surveys to track potential impacts from recreational use to allow adaptive management if degradation to these elements is observed. Interdepartmental collaboration should involve coordination between environmental scientists, enforcement officers, and public environmental groups to ensure that data collected informs adaptive management decisions, regulatory compliance, and visitor education efforts. This integrated approach will help maintain ecological integrity while providing safe and equitable public access.

b. Planning for Nesting Raptor Avoidance and Minimization

Special events currently held, and conceptually proposed, throughout the Plan Area have the potential to impact nesting raptors such as bald eagles and osprey. These events typically include elevated ambient noise, visual disturbances, and human activity in close proximity to nests.

Fish and Game Code section 3503 states that it is "*unlawful to take, possess, or needlessly destroy the nest or eggs of any bird*". Section 3503.5 extends this protection specifically to birds of prey, making it unlawful to take or destroy any raptor (Falconiformes or Strigiformes) or its nest. Section 3513 similarly prohibits taking or possessing any migratory nongame bird designated under the Federal Migratory Bird Treaty Act, which includes most native raptor species. In practical terms, these statutes prohibit any intentional or negligent disturbance that causes harm to an active nest or eggs.

These provisions apply to all people and agencies, including local governments. Any activity that disturbs or harasses nesting raptors may be a violation of Fish and Game Code. Therefore, the Lead Agency has a legal obligation to avoid and minimize actions that disturb active nests. City-sponsored events, special-use permits, construction or public works activities that could elevate ambient noise, lighting, or crowding near nests should be planned and managed in ways that prevent unlawful take.

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To meet these obligations and protect nesting raptors, CDFW recommends that the Lead Agency develop a comprehensive Nesting Raptor Management Plan as a mitigation measure for the Project. Such a plan would establish clear procedures for avoiding and minimizing disturbance of nests during high impact events held throughout the Plan Area, which would ensure that the City's nesting raptors are protected, while still accommodating public events and public works projects. CDFW staff are available to assist the Lead Agency during the development and implementation of a Nesting Raptor Management Plan. Early coordination will help integrate technical expertise and ensure that the plan is effective and compliant with Fish and Game Code.

c. Planning for Anadromous Fish Avoidance and Minimization

The Sacramento River remains the only river system that supports four distinct runs of Chinook Salmon, which make an annual journey from the Pacific Ocean to Redding to spawn: winter-run, spring-run, fall-run, and late fall-run. Additionally, the entire Plan Area is designated Essential Fish Habitat under the Magnuson-Stevens Act for Chinook Salmon and serves as a wildlife corridor for these species. Protecting this species is not only a legal obligation under state and federal endangered species laws, but an essential component of preserving the City of Redding's ecological legacy. Any activity that could degrade habitat, alter flow regimes, or impede migration threatens the Sacramento River's biodiversity, in addition to the cultural and economic values tied to these fisheries.

Special events, construction activities, recreational access points, and other conceptually proposed projects along the Sacramento River have the potential to impact the above referenced Chinook Salmon runs, as well as California Central Valley steelhead trout and green sturgeon. These species are highly sensitive to changes in water quality, flow conditions, habitat alteration, and physical disturbance, particularly during migration, spawning, and juvenile rearing periods.

Activities that may alter flow regimes, increase sedimentation, degrade riparian habitat, impact spawning beds, introduce pollutants, or create physical barriers that impede fish passage should be avoided. City-sponsored events, special-use permits, construction or public works projects that involve in-water work, bank stabilization,

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creation of impervious surfaces, increase turbidity, and increase ambient lighting along the river corridor should be planned and managed to avoid and minimize impacts.

To meet these obligations and protect listed fish, CDFW recommends the Lead Agency develop a formal Aquatic Species Protection and Management Plan as a mitigation measure for the Project. Such a plan should establish clear procedures for avoiding and minimizing disturbance during critical life stages for salmonids and other aquatic species, including timing restrictions for in-water work, best management practices for erosion and sediment control, and measures to maintain water quality and fish passage. CDFW staff are available to assist the Lead Agency during the development and implementation of this plan. Early coordination will help integrate technical expertise and ensure that the plan is effective and compliant with Fish and Game Code requirements and minimizes Project impacts to less-than-significant.

d. Local Pollinators, Vegetation Management and Landscaping

To support local and sensitive pollinators, and reduce impacts associated with vegetation management, CDFW recommends that the Lead Agency incorporate pollinator-safe pesticide practices and regionally appropriate native landscaping into the Plan. When pesticide use is deemed necessary for emergent vegetation, invasive species or weed control, measures should be included to avoid and minimize impacts on pollinators.

Measures may include restricting overall pesticide use, avoiding broadcast applications, ensuring staff are trained to identify native flowering plants (especially native thistles), and applying pesticides only outside the known blooming season. Additional best practices include avoiding pesticides marked with the U.S. EPA bee-hazard icon, avoiding applications on any flowering plant, selecting products with short residual toxicity to bees, avoiding pesticide mixtures, and ensuring all applications are conducted by a licensed and certified applicator. Resources such as the Xerces Society, USEPA, California Department of Pesticide Regulation, and UC ANR's Bee Precaution Database⁸ provide guidance for pollinator-safe pest management.

⁸ <https://www2.ipm.ucanr.edu/bee precaution/>

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In addition to thoughtful pesticide use, CDFW recommends requiring regionally appropriate native vegetation in landscaping plans throughout the Plan Area. Native plants provide essential resources for pollinators and local wildlife; reduce the need for pesticides; conserve water; and decrease landscape maintenance. Tools provided by the California Native Plant Society, such as Calscape⁹, can be used to identify locally occurring native species, inform planting palettes, and guide care and maintenance. Incorporating native vegetation and pollinator-friendly management practices together enhances habitat quality, supports ecological function, and helps maintain genetically resilient native plant communities.

e. Sensitive Riparian Habitats

According to the RRSP Biological Constraints Report (BCR) prepared in October 2024, the Plan Area contains approximately 82 acres of sensitive riparian communities, including Great Valley Mixed Riparian Forest (imperiled) and Great Valley-Valley Oak Riparian Forest (critically imperiled). These habitats provide essential ecological functions and values to our local wildlife. The BCR recommends preserving all Valley Oak Riparian Forest and avoiding Great Valley Mixed Riparian Forest, where possible.

CDFW staff concur with the BCR and recommend the Lead Agency plans to completely avoid development, disturbances and alteration within and adjacent to these habitats. Additionally, the DEIR should include enforceable measures to avoid direct removal or root damage to riparian vegetation, maintain connectivity between riparian habitat patches, require compensatory mitigation for any unavoidable impacts, ideally formulate a master Restoration Plan to include long-term monitoring and adaptive management to ensure riparian habitat integrity remains and/or improves over the life of the Project.

f. Jurisdictional Waters

According to the BCR, over 60% of the Plan Area may qualify as wetlands, the Sacramento River and adjacent ponds are under the regulatory purview of the United States Army Corps of Engineers, Regional Water Quality Control Board, and CDFW. Encroachment may require permits under Clean Water Act sections 404/401 and Fish and

⁹ Calscape.org

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Game Code section 1600.

CDFW recommends the Lead Agency require formal jurisdictional delineations and hydrology studies before approving any project within the Plan Area, ensure compliance with federal and state permitting requirements, incorporate design measures that avoid altering hydrology or degrading water quality, commit to “no net loss” of wetlands through on-site restoration.

g. Invasive Species Management

According to the BCR, the Plan Area supports a high density of invasive plant species that degrade habitat quality and compete with native vegetation, including Himalayan blackberry (*Rubus armeniacus*), yellow star-thistle (*Centaurea solstitialis*), giant reed (*Arundo donax*), Bermuda grass (*Cynodon dactylon*), Johnson grass (*Sorghum halepense*), glossy privet (*Ligustrum lucidum*), tree of heaven (*Ailanthus altissima*), and pokeweed (*Phytolacca americana*). Recreation, construction and maintenance within the Plan Area has the potential to introduce and spread these species. Additionally, Recreation has the potential to introduce invasive wildlife species, including but not limited to, the golden mussel (*Limnoperna fortunei*)¹⁰. The BCR recommends development of an Integrated Pest Management Plan to address these infestations. CDFW concurs with this recommendation.

An Integrated Pest Management Plan should include mapping of invasive species throughout the Plan Area, potential methods of introduction of invasive species throughout the Plan Area, identification of treatment methods (e.g., mechanical removal, hand-pulling, and aquatic and pollinator approved herbicides where appropriate), and a long-term maintenance and monitoring schedule to prevent infestation/reinfestation. Invasive species removal should be incorporated as a condition of approval for all future development projects and considered a priority mitigation measure to restore ecological integrity within the Sacramento River corridor throughout the Plan Area.

h. Wildlife Movement and Lighting Impacts

The Sacramento River corridor within the Plan Area functions as a

¹⁰ <https://wildlife.ca.gov/Conservation/Invasives/Species/Golden-Mussel>

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critical wildlife movement corridor and nursery site for both aquatic and terrestrial species, as well as a major stopover along the Pacific Flyway for migratory birds. Artificial lighting and reflective glass structures pose well-documented risks to birds, bats, and other nocturnal wildlife by disrupting natural movement patterns, foraging behavior, and breeding cycles. The BCR notes that artificial lighting can interfere with wildlife using riparian corridors and that glass facades increase the risk of bird collisions, particularly near vegetated areas and water bodies. Beyond avian species, light pollution also affects terrestrial mammals and aquatic species by altering circadian rhythms, reducing habitat connectivity, and increasing predation risk^{11,12}. Studies show that artificial light can fragment habitat and impede movement for nocturnal species, while glass structures near riparian zones can cause high mortality for migratory birds¹³.

The Plan should adopt design standards that minimize these impacts, including bird-safe glazing treatments (e.g., fritted glass or UV patterns), reduced glass facades near riparian habitat, and lighting restrictions such as shielded fixtures, downward orientation, reduced intensity, and seasonal “lights-out” programs during migration periods. These measures should apply not only to new structures but also to public spaces and trail lighting to maintain ecological connectivity for birds, bats, and terrestrial and aquatic wildlife.

i. Human and Wildlife Conflict

The City's rural-urban interface results in Redding's community living in proximity to wild animals and their natural habitats. Conflict between humans and wildlife is a growing concern in developing areas, especially where the conflict results in livestock losses, property damage, spread of wildlife diseases, animal welfare and/or mortality.

CDFW offers the following recommendations when considering the inclusion of Plan policies and adoption of subsequent policies to avoid human and wildlife conflict:

¹¹ Longcore, T., & Rich, C. (2004). Ecological light pollution. *Frontiers in Ecology and the Environment*, 2(4), 191–198.

¹² Gaston, K. J., et al. (2013). The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biological Reviews*, 88(4), 912–927

¹³ American Bird Conservancy (2011). *Bird-Friendly Building Design*

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1. Wildlife Friendly Fencing- CDFW recognizes that fences are important for controlling trespass and marking property boundaries; however, poorly designed or installed fencing can pose significant hazards and barriers to wildlife within the Plan Area. Redding supports native ungulates, most commonly mule deer. In recent years, CDFW has received reports of deer trapped in fences located within or near the Plan Area. Deer frequently use the river corridor for shade, forage, and water, and fences may impede their movement to these critical resources.

CDFW strongly encourages the Lead Agency to consider any existing and proposed fencing in the Plan Area to be constructed with wildlife friendly fencing techniques, to reduce the potential of injury or death, and provide safe connections and corridors between the habitats that wildlife species use during daily and annual movements. CDFW staff are also available to assist in providing further recommendations for effective wildlife friendly fencing techniques and the locations where they should be used.

2. Human-Wildlife Conflict with Waterbirds: The Plan Area provides critical habitat for migratory and resident waterbirds. Most observed waterbird species in the Plan Area include Canada goose (*Branta canadensis*), Mallard duck (*Anas platyrhynchos*), and California gull (*Larus californicus*).

Waterbirds provide important ecosystem services such as nutrient cycling and seed dispersal and play a vital role in the food chain. However, human activities in the Plan Area can create significant conflicts. Feeding waterbirds encourages unnatural congregation, which can lead to property damage, degraded water quality from concentrated waste, and increased disease transmission among birds. Additionally, discarded fishing line and tackle pose serious animal welfare risks, often resulting in entanglement, injury, or death. Some species have adapted to human-modified environments and may occur as migratory visitors or year-round residents within the Plan Area, making these issues more prevalent. CDFW recommends the Lead Agency to consider appropriately

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placed and frequently maintain signage, as well as other means of public education, to discourage feeding of waterbirds and encourage leave-no-trace ethics for recreational equipment often used throughout the Plan Area. For more information about preventing potential conflicts with waterbirds, please visit CDFW's Human-Wildlife Conflicts: Birds¹⁴ webpage.

3. Human-Wildlife Conflict with Black Bears- Black bears play an important role in California's ecosystem as seed dispersers, scavengers, and predators. As omnivores, they consume a wide variety of foods which may including seeds, plants, berries, other animals, pet food, human food, and trash. Improperly stored garbage, bird feeders, fruit trees, and accessible pet food can attract bears, increasing the risk of bears becoming habituated to humans and losing their natural fear. This behavioral change often leads to more bear encounters, property damage and animal welfare issues. CDFW recommends that the Lead Agency ensure trash receptacles throughout the Plan Area are designed and placed to minimize bear access, discourage bird feeders and fruit trees within the Plan Area and ensure outdoor facilities are regularly maintained to reduce human-bear conflicts. For more information about preventing potential conflicts with black bears, please visit CDFW's Human-Wildlife Conflicts: Black Bears¹⁵ webpage.

4. Human-Wildlife Conflict with Mountain Lions- Mountain lions play an important role in California's ecosystems by helping to maintain balanced and healthy prey populations. As top predators, they hunt deer, elk, and smaller animals such as coyotes, raccoons, rodents, and invasive species like wild pigs and feral cats. Although mountain lions are generally reclusive and avoid humans, conflicts can occur when attractants, such as intentionally feeding wildlife or feral cats, draw prey species closer to human activity. This can increase the likelihood of lions approaching developed areas and lead to risks involving pets, livestock, and property. CDFW recommends that the Lead

¹⁴ <https://wildlife.ca.gov/HWC/Birds#586995495-waterbirds>

¹⁵ <https://wildlife.ca.gov/HWC/Black-Bears>

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Agency implement measures that reduce attractants to prey species. CDFW recommends that the Lead Agency ensure the Plan Area is well-maintained to minimize potential conflict with mountain lions, by appropriately placed and frequently maintain signage, discourage/prohibit the feeding of wildlife and ensuring outdoor facilities are regularly maintained to reduce human-mountain lion conflicts. For more information about preventing potential conflicts with mountain lions, please visit CDFW's Human-Wildlife Conflicts: Mountain Lions¹⁶ webpage.

j. Habitat Protection and Restoration Plan

The BCR strongly recommends development of a comprehensive Redding Riverfront Habitat Protection and Restoration Plan to guide future projects within the Plan Area. This plan should include a detailed inventory of existing unique and old-growth trees, mapping of invasive species infestations, and identification of priority areas for preservation and restoration. Restoration guidelines should specify native species selection, timing of maintenance activities, weed control methods, and trash removal schedules, along with monitoring and adaptive management protocols to ensure long-term success. The plan should also address connectivity between sensitive habitats to maintain ecological corridors and prevent fragmentation. Incorporating this restoration plan as a mandatory mitigation measure will help to avoid potentially significant impacts, improve habitat quality, and ensure cumulative ecological benefits across all future development projects in the Sacramento River corridor.

k. Low Impact Development

The Plan Area is adjacent to sensitive water resources and suitable habitat for special status aquatic species. CDFW recommends the thoughtful planning and implementation of Low Impact Development¹⁷ (LID) strategies to prevent a net-increase in stormwater runoff from impervious surfaces associated with new development and parking lots. 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

¹⁶ <https://wildlife.ca.gov/HWC/Mountain-Lions#585733601-preventing-conflicts>

¹⁷ https://www.waterboards.ca.gov/water_issues/programs/low_impact_development/

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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 flooding and the 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 run-off 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. CDFW recommends including LID strategies throughout the Plan Area.

Regulatory Requirements

California Endangered Species Act

Reasonably foreseeable future projects may be subject to CDFW's regulatory authority pursuant to CESA. CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and candidate plant and animal species, pursuant to CESA¹⁸. listed species that a CESA Incidental Take Permit (ITP) or other appropriate form of CESA authorization be obtained if future proposed Projects have the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of state-listed species, either through construction or over the life of the project.

CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures (AMM's) may be necessary to obtain a CESA authorization. CDFW must comply with CEQA for issuance of a CESA authorization. CDFW therefore recommends that the DEIR address all Project impacts to CESA-listed species and specify a mitigation monitoring and reporting program that will meet the requirements of CESA. Based on review of CNDDDB, the NOP and local knowledge of the Project area, CESA-listed species have the potential to occur onsite.

¹⁸ <https://wildlife.ca.gov/Conservation/CESA>

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Lake and Streambed Alteration Program (LSA)

Future project implementation associated with the General Plan update may require notification under Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and water courses with a subsurface flow.

Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether an LSA Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify a Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a discretionary action subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. Please visit CDFW's Lake and Streambed Alteration Program¹⁹ for additional information.

Fully Protected Species

Fully protected species may not be taken or possessed at any time and authorization may not be issued for their take except as follows: The take is for necessary scientific research, efforts are to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock, if they are a covered species whose conservation and management is provided for in a Natural Community

¹⁹ <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>

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Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515) and/or qualify for CDFW authorization pursuant to Senate Bill 147. Specified types of infrastructure Projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met pursuant to Senate Bill 147 (see Fish & G. Code §2081.15). To obtain information about Fully Protected Animals, please access CDFW's Fully Protected Animals.²⁰

CEQA Filing Fees

If the Project has an impact on fish, wildlife, or habitat, filing fees are required. 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. Additionally, payment of a filing fee may be required for each 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 collaborate with local governments in the development and implementation of local policies and ordinances that encompass biological resources. CDFW is enthusiastic to assist the Lead Agency in fostering a harmonious coexistence between human development and preservation of Redding's unique and invaluable biological resources through comprehensive planning.


²⁰ <https://wildlife.ca.gov/Conservation/Fully-Protected>

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Conclusion

CDFW appreciates the opportunity to comment on the NOP to assist the Lead Agency in considering 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: State Clearinghouse
state.clearinghouse@lci.ca.gov

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