



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



May 18, 2026

Amber Kelley
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City of Redding
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SUBJECT: REVIEW OF BUTTE STREET BOOGIE NETWORK PROJECT, SHASTA COUNTY, STATE CLEARINGHOUSE NUMBER 2026050043

Dear Amber Kelley:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (MND) for the above-referenced project (Project) posted for public comment on May 1, 2026. CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

Project Description

The Project, as described in the MND, is as follows

“The City of Redding proposes to construct an Active Transportation Project. The purpose of the project is to safely accommodate active transportation, including people that walk, bike and roll. It is needed because the roadway and trail segments included in the project have discontinuous pedestrian and bicycle facilities, and for some sections, no facilities. Pedestrians and bicyclists are required to share roadways with motor vehicles, take circuitous detours, or use unimproved (dirt surface) paths.

The project includes: three new 36-foot diameter traffic circles, new and upgraded ADA curb ramps, curbs, gutters, sidewalks, retaining walls, lighting, multi-use pathways, and a pedestrian bridge. Construction work will consist of earthwork, trenching, vegetation removal, utility relocation, drainage installation and modification, tree planting, installation of irrigation, paving, striping, and

¹ California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15000 et seq.)

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sign replacement/installation. Utilities will be relocated as needed to implement the ADA compliant improvements. Drainage improvements include the installation, modification, removal, or replacement of the City storm drain utility infrastructure to ensure positive drainage of the non-motorized improvements. The improvements will be constructed the City right of way and within easement areas. Construction is anticipated to begin in 2027 and continue through 2028."

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its Trustee Agency capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by state law, of any species protected under the 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.

California Endangered Species Act (CESA)

Please be advised that a CESA permit² must be obtained if the Project has the potential to result in "take" (hunt, pursue, catch, capture, kill, or attempt thereof) of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project has the potential to result in the take of a CESA-listed species, early consultation is encouraged, as significant modification to the Project may be necessary to

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

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minimize and fully mitigate impacts as required by Fish and Game Code section 2081(b)(2).

Lake and Streambed Alteration (LSA) Agreements

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
- 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.

Work within perennial and ephemeral streams, and watercourses with a subsurface flow, is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through horizontal directional drilling or trenching, is also generally subject to notification requirements. Therefore, impacts to the mainstems, tributaries, associated riparian habitat, and hydrologically connected floodplains caused by the proposed Project may require an LSA notification.

CDFW, as a responsible agency under CEQA, will consider the CEQA document for the project. The CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for completion of the agreement. Lake and Streambed Alteration (LSA) Program staff are available to assist and can be contacted at r1lsaredding@wildlife.ca.gov. To obtain information about the 1602 Notification process, please visit the LSA Program website³.

Biological Setting

The Project is located in the City of Redding along Butte, Shasta, and Placer Streets, and within the open space area between Almond Avenue and Butte Street. This urbanized setting retains scattered biological resources associated with Calaboose Creek, oak woodland, and mature vegetation dispersed throughout the surrounding streetscape. The oak woodland in the open space

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

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consists primarily of blue oak and interior live oak, which provide high value habitat through acorn production, cavity formation, and a structurally diverse canopy that supports a wide variety of wildlife. This habitat offers foraging and nesting opportunities for numerous bird species, roosting for bats, sources for pollinators and seasonal refuge for small mammals and invertebrates, functioning as an important remnant of native habitat within an otherwise developed portion of western Redding. Calaboose Creek, although degraded by urban runoff and channel modification, continues to support a narrow riparian corridor that provides movement, foraging, and seasonal refuge for wildlife such as the northwestern pond turtle (*Actinemys marmorata*, state Species of Special Concern). Outside the creek corridor, ornamental and native street trees, landscaping, and remnant patches of vegetation offer pockets of urban habitat that can support nesting birds and additional roosting opportunities for bats that may utilize tree cavities, exfoliating bark, or canopies. Despite surrounding urban development, these resources function collectively as a network of small but meaningful habitat features, allowing wildlife to persist and move through the Project area and the broader west Redding landscape.

Comments and Recommendations

CDFW staff recognize that the City of Redding (Lead Agency) have taken some appropriate steps needed to evaluate this Project's impacts to biological resources. CDFW offers the following comments and recommendations to further 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.

Crotch's Bumble Bee

On September 30, 2022, the California Fish and Game Commission reinstated the candidacy of Crotch's bumble bee (*Bombus crotchii*, CBB) under CESA, re-advancing these species to the candidacy stage of the CESA listing process. Candidate species are granted full protection under CESA and CDFW considers impacts to species that are candidates for CESA listing to be significant under CEQA. 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).

According to the California Natural Diversity Database (CNDDDB) Biogeographic Information and Observation System, the Project area occurs within the currently known range for CBB. CBB's are generalist foragers and have been reported

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visiting a wide variety of flowering plants⁴. Based on habitat and vegetation description in the MND and review of the property on aerial imagery, it appears that suitable habitat for CBB may be present in the open space between Almond Avenue and Butte Street. However, focused surveys for CBB were not conducted as part of the MND nor were any measures for avoidance, minimization, or mitigation conditioned.

To adequately assess this Project's potentially significant impacts on special status bumble bees, the MND should include an analysis of the Project's impact on floral resources, nesting habitat, and overwintering habitat found onsite. CBB should be considered a threatened, endangered, or rare species under CEQA pursuant to CEQA Guidelines section 15380. If found on-site, the Project could result in crushing or killing CBB, reduction in food resources such as nectar and pollen, and/or removal of nesting and overwintering sites. Many bumble bees are threatened with extinction due primarily to reductions in habitat from urbanization, intensive agriculture, and invasive species introductions. If CBB occurs within or nearby to the Project site, Project activities may result in a substantial reduction in the species' population locally, which may lead to a mandatory finding of significance (CEQA Guidelines, § 15065).

Due to potentially suitable habitat within the Project area and to avoid take of CBB, CDFW recommends the following measures are included in the MND to avoid Project impacts to CBB:

Mitigation Measure X: Surveys shall be performed by a qualified entomologist familiar with the species behavior and life history to determine the presence/absence of Crotch's bumble bee within one year prior to vegetation removal and/or grading following CDFW's Survey Considerations for CESA Candidate Bumble Bee Species⁵. Surveys shall be conducted during flying season when the species is most likely to be detected above ground. Survey results, including negative findings, shall be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report shall provide the following:

- a) *A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee. CDFW recommends*

⁴ Biesmeijer, Jacobus & Roberts, Stuart & Reemer, M. & Ohlemüller, Ralf & Edwards, Mike & Peeters, Theo & Schaffers, A.P. & Potts, Simon & Kleukers, Roy & Thomas, Chris & Settele, Josef & Kunin, William. (2006). Parallel Declines in Pollinators and Insect-Pollinated Plants in Britain and the Netherlands. *Science* (New York, N.Y.). 313. 351-4. 10.1126/science.1127863.

⁵ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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the map show surveyor(s) track lines to document that the entire site was covered during field surveys.

- b) Field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched.*
- c) Map(s) showing the location of nests/colonies.*
- d) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).*

MM X: Avoidance Plan – If Crotch's bumble bee is detected, qualified biologist shall immediately notify CDFW as further coordination will be required to avoid or mitigate significant impacts. In addition, a Crotch's Bumble Bee Avoidance Plan shall be developed.

At a minimum, the avoidance plan shall identify the location of all nests in or adjacent to the Project site as well as all inactive small mammal burrows and thatched/bunch grasses. If an inactive burrow may be disturbed by Project activities, it shall be resurveyed for Crotch's bumble bee within seven (7) days prior to the scheduled disturbance. A minimum 100-foot no disturbance buffer zone shall be established around nests to reduce the risk of disturbance or accidental take. The qualified biologist shall expand the buffer zone as necessary to prevent disturbance or take. An avoidance plan shall be submitted prior to the issuing of the Project a grading permit.

MM X #3: Incidental Take Permit – If the Project proponent is unable to avoid impacts to Crotch's bumble bee, the Project proponent shall consult with CDFW and obtain appropriate take authorization (pursuant to Fish & G. Code, § 2080 et seq.). The Project proponent shall obtain appropriate take authorization prior to the issuing of a grading permit.

MM X #4: Habitat Replacement – The Project proponent shall provide no less than 1:1 compensatory mitigation for removal or damage of any floral resource

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associated with Crotch's bumble bee. Floral resources shall be replaced as close to their original location as is feasible. If floral resources cannot be replaced within 200 meters of their original location, floral resources shall be planted in the most centrally available location relative to identified Crotch's bumble bee nests. This location shall be no more than 1.5 kilometers from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests. These floral resources shall be maintained in perpetuity and replanted and managed as needed to ensure the habitat is preserved.

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 MND considers potential impacts to bats, the avoidance and minimization measure, MM-7, 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 within the Project area that contain any 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 individually roosting bats. CDFW recommends incorporating the following revisions, shown in bold, to MM-7 to more adequately avoid this Projects potential impacts to bats:

MM-7: 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:**

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- ***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.***
- 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:**
- ***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.***
 - ***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).

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Oak Woodlands

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. According to the U.S. Forest Service, of California's 632 native terrestrial vertebrates, more than 300 species, including at least 120 mammals, 147 birds, and around 60 amphibians and reptiles, utilize oak woodlands for food, cover, and reproduction⁶.

The MND states *"approximately 43 trees will be removed for construction of the trail through open space area and construction of the sidewalk along Placer Street. Approximately 31 street and landscape trees will be removed to construct sidewalk and the traffic circles."* Larger, mature trees within City open spaces provide high ecological value and should be avoided. Mature trees offer habitat structure that cannot be quickly replaced, support nesting and roosting opportunities for a variety of wildlife, including cavity nesting birds, raptors, and tree roosting bats, while also contributing to overall habitat continuity in an otherwise urbanized setting. When removal of trees cannot be avoided, revegetation should be prioritized to restore ecological function with regionally appropriate native vegetation.

The MND does not include a proposal to replace oak woodland habitat lost with the implementation of this Project. CDFW recommends the Lead Agency include an impact analysis of oak woodland habitat and a Revegetation Monitoring Plan to address the need for reestablishing canopy cover, structural diversity, or species composition comparable to the impacted woodland habitat. To ensure that oak woodland functions are restored to existing conditions or better, and to align with CEQA's requirement that mitigation be feasible, enforceable, and effective, the measure should be revised to include performance standards and success criteria.

Success criteria should be based on the specific species composition and structural characteristics of the impacted oak community. Success should not

⁶ Zack, Steve; Chase, Mary K.; Geupel, Geoffrey R. 2002. The oak woodland bird conservation plan: a strategy for protecting and managing oak woodland habitats and associated birds in California. In: Standiford, Richard B., et al, tech. editor. Proceedings of the Fifth Symposium on Oak Woodlands: Oaks in California's Challenging Landscape. Gen. Tech. Rep. PSW-GTR-184, Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture: 845-846

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be determined until the mitigation area has been completely irrigation free for a minimum of 3 years and the ecological metrics have remained stable over that period. Stability means no negative trends in native species richness, diversity, abundance, or cover within each vegetation layer, and no positive trends in invasive or non-native species cover.

Regionally Appropriate Revegetation and Landscaping

Revegetating with regionally appropriate native vegetation has often not been conditioned in approved projects throughout the City. CDFW recommends conditioning the use of native vegetation and regionally appropriate species for the re-vegetation of this Project. Benefits of utilizing native vegetation are numerous and include providing vital resources for native wildlife such as hummingbirds and other beneficial pollinators, conserving water, reducing pesticide use, and reducing maintenance of plantings.

The California Native Plant Society (CNPS) website⁷ 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 Calscape⁸ 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 Degradation⁹.

Filing Fees

Filing fees are applicable when a Project would have an impact on fish and/or wildlife. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the 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.)

Submitting Environmental Data

CEQA requires that information developed in environmental documents be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code, § 21003,

⁷ <https://www.cnps.org/>

⁸ <https://calscape.org/>

⁹ <https://www.cnps.org/wp-content/uploads/2018/04/landscaping.pdf>

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subd. (e).) Accordingly, please report any observation of special status species to the CNDDDB using the CNDDDB field survey form^{10,11}.

Promoting Collaboration

CDFW is charged with preserving and protecting the state's diverse ecosystems and wildlife; therefore, CDFW maintains a strong commitment to collaborate with local government entities. CDFW is enthusiastic to continue assisting the Lead Agency in implementing comprehensive avoidance and minimization for the benefit of California's sensitive resources and aligning regulatory frameworks and appreciates the collaboration thus far. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist (Specialist) by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

AA601B4C4B11422...

Michael Harris, Acting Regional Manager
Northern Region

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¹⁰ California Department of Fish and Wildlife. (2016, November). *CNDDDB Online Field Survey Form User Guide*. Retrieved from <https://nrm.dfg.ca.gov/fieldSurvey/default.aspx>

¹¹ California Department of Fish and Wildlife. (n.d.). *Submitting data to the California Natural Diversity Database (CNDDDB)*. Retrieved from <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>