

MITIGATED NEGATIVE DECLARATION

DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT (STATE CLEARINGHOUSE NO. 2018112024)

SUBJECT

Diestelhorst to Downtown Non-Motorized Improvement Project

PROJECT DESCRIPTION

The proposed project would consist of a trail connection that starts at the north end of the project area where it would tie into the existing Sacramento River Trail system at the parking lot on the south side of the river, near the Diestelhorst Bridge. Two 12-foot-wide paved trails would be constructed between the parking lot and Riverside Drive. Proposed improvements include sidewalk gap completion, improved intersection facilities, corridor lighting, an enhanced crossing with rapid flashing beacons at Court Street, and a dedicated cycling and pedestrian pathway requiring either a one-way or full closure of Riverside Drive from Court Street to Center Street. Additional project elements include constructing bulb-outs, improving storm drainage along Center Street, slurry sealing along North Court Street and Riverside Drive, an asphalt concrete overlay, striping, sign replacement, and overhead utility relocation. Most of the work would occur in the City's right of way; however, a minor amount of utility acquisition would be required. It is anticipated that construction would take one season and is planned for 2020.

One of the trail alignments crosses Court Street at its intersection with Riverside Drive. Safety enhancements would be installed, including a refuge island, enhanced striping, and pedestrian-activated rapid flashing beacons. Enhanced and buffered striping would be placed north- and southwards on Court Street to help ensure adequate speed reduction at the crosswalk. The second trail would travel under Diestelhorst Bridge and the Court Street/Benton Drive bridge then turn south and run along the east side of Court Street connecting with Riverside Drive just west of the Union Pacific railroad tracks. Additional project elements include constructing bulb-outs, improving storm drainage along Center Street, slurry sealing along North Court Street and Riverside Drive, an asphalt concrete overlay, striping, sign replacement, and overhead utility relocation.

A dedicated cycling and pedestrian pathway requiring either a one-way (partial) or full closure of Riverside Drive from Court Street to the intersection of Center Street is proposed. To evaluate the potential environmental impacts of each option, two project alternatives were identified.

Alternative 1 – This alternative includes all project improvements and features identified above, and would require a one-way closure of Riverside Drive from Court Street to Center Street.

Alternative 2 (Preferred Alternative) – This alternative includes all project improvements and features identified above and would require a full closure of Riverside Drive from Court Street to Center Street. Vehicle access would be limited to the businesses located in the eastern portion of the road closure. Alternative 2 is the preferred alternative.

Two staging areas are proposed. One is the lower paved parking lot for the Sacramento River Trail west of the trail connecting to Diestelhorst Bridge. The second is a graveled lot also used for parking south of Diestelhorst Bridge. The proposed project design, including staging areas, is shown on Attachment A, Figure 2 – Proposed Project Layout.

ENVIRONMENTAL SETTING

The proposed project area generally flows through a mixed-use area including residential, commercial, and open space regions. The trail would parallel North Court Street, Riverside Drive, and Center Street and would flow from open space into the downtown area of Redding. Diestelhorst Bridge lies just the north of the proposed project and the Union Pacific Railroad immediately parallels North Court Street on the east. Adjacent to the project area are rural residential developments and commercial to the east, south, and west and the Sacramento River and open space to the north.

FINDINGS AND DETERMINATION

The City of Redding conducted an Initial Study (attached) that determined that the proposed project could have significant environmental effects on biological resources and transportation/traffic. Use of specific mitigation measures identified below will avoid or mitigates the potentially significant environmental effects identified, and the preparation of an environmental impact report will not be required. If there are substantial changes that alter the character or impacts of the proposed project, another environmental impact determination will be necessary.

Prior to approval of the project, the lead agency may conclude, at a public hearing, that certain mitigation measures identified in the Mitigated Negative Declaration are infeasible or undesirable. In accordance with CEQA Section 15074.1, the lead agency may delete those mitigation measures and substitute other measures that it determines are equivalent or more effective. The lead agency would adopt written findings that the new measure(s) is equivalent or more effective in mitigating or avoiding potential significant effects and that it would not cause any potentially significant effect on the environment.

1. Based on the whole record (including the Initial Study and any supporting documentation) and the mitigation measures incorporated into the project, the City of Redding has determined that there is no substantial evidence that the project will have a significant effect on the environment.
2. The Mitigated Negative Declaration, with its supporting documentation, reflects the independent judgment and analysis of the lead agency, which is the City of Redding.

DOCUMENTATION

The attached Initial Study documents the reasons to support the above determination.

MITIGATION MEASURES

The following mitigation measures will be incorporated into the project to minimize potential effects on biological resources:

MM BIO -1. The construction limits shall be clearly identified prior to construction and all areas containing elderberry shrubs (*Sambucus nigra*) to be avoided during construction shall be fenced or flagged off.

MM BIO -2. For elderberry shrubs occurring within or immediately adjacent to work locations, 20-foot avoidance buffers shall be established around the driplines of the shrubs to help protect the shrubs and their root zones during project activities. The avoidance buffers shall be maintained for the duration of work activities in the area.

MM BIO -3. To the extent feasible, all activities that occur within 165 feet of an elderberry shrub, shall be conducted outside of the flight season of VELB (March-July).

MM BIO -4. If trimming of elderberry shrubs is required, it shall take place between November and February and will avoid the removal of any branches or stems measuring 1 inch or greater in diameter.

MM BIO -5. Removal of vegetation within the dripline of an elderberry shrub shall be limited to August through February when adults are not active. Removal activities shall avoid damaging the elderberry shrub.

MM BIO -6. The City proposes to transplant three elderberry stems, greater than 1-inch that require removal, to a USFWS approved location. In addition, the City shall also purchase one credit as mitigation for the impacted stems. The following transplanting guidelines are recommended to minimize the chance of adverse effects of VELB during transplanting.

- Exit-hole surveys shall be completed immediately before transplanting. The number of exit holes found, GPS location of the plant to be relocated, and the GPS location of where the plant is transplanted shall be reported to the Service and to the CNDDDB.
- Elderberry shrubs shall be transplanted when the shrubs are dormant (November through the first two weeks in February) and after they have lost their leaves. Transplanting shall follow the most current version of the ANSI A300 (Part 6) guidelines for transplanting.

MM BIO -7. If western pond turtle or foothill yellow-legged frogs are encountered in the BSA during construction and could be harmed by construction activities, work will stop in the area and the City will notify CDFW. Upon authorization from CDFW, a qualified biologist may relocate the individual(s) the shortest distance possible to a location containing habitat outside of the work area.

MM BIO -8. If a western pond turtle nest is discovered during construction activities, a qualified biologist shall flag the site and determine if construction activities can avoid affecting the nest. If the nest cannot be avoided, it shall be excavated and relocated to a suitable location outside of the construction impact zone by a qualified biologist in coordination with CDFW. The City shall inform Caltrans when such an activity occurs.

MM BIO -9. If vegetation removal or construction activities will occur during the nesting season for birds (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey 7 days before construction activities begin. If nesting birds are found, CDFW will be notified and consulted. An

appropriate buffer, as determined by CDFW and the qualified biologist, will be placed around the nest until the young have fledged.

MM BIO -10. If an active raptor nest is found, no construction activities shall occur within 250 feet of the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young have left the nest or as approved by the qualified biologist. If an active non-raptor bird nest is found. An appropriate buffer zone around the nest shall be determined by the qualified biologist and remain in place until the young have fledged.

MM BIO -11. To the extent practicable, removal of large trees with cavities shall occur before bat maternity colonies form (i.e., prior to March 1) or after young are volant (i.e., after August 15).

MM BIO -12. If construction (including the removal of large trees) occurs during the bat non-volant season (March 1 through August 15), a qualified professional shall conduct a pre-construction survey of the BSA to locate maternity colonies and identify measures to protect colonies from disturbance. The pre-construction survey will be performed no more than 14 days prior to the implementation of construction activities (including staging and equipment access). If a maternity colony is located within or adjacent to the BSA, a disturbance-free buffer shall be established by a qualified professional to ensure the colony is adequately protected from project activities.

MM BIO -13. To the extent practicable, removal of vegetation shall occur outside of the ring-tailed cat maternal denning period (May 1–June 30).

MM BIO -14. If vegetation removal is to occur during the ring-tailed cat maternal denning period (May 1–June 30), a qualified biologist shall conduct a preconstruction survey of the BSA to locate maternity dens. The preconstruction survey will be performed no more than 7 days prior to the vegetation removal.

MM BIO -15. If a ring-tailed cat maternity den is found, a qualified biologist (in consultation with the City and CDFW) will develop measures to protect the maternity den from disturbance.

MM BIO -16. To the extent practical no removal of native trees or shrubs shall occur in valley foothill riparian habitat. Removal of native vegetation shall be limited to the minimum area necessary to facilitate construction in valley oak woodland habitat.

MM TRA -1. The project's potential cumulative contribution to traffic impacts will be mitigated by payment of the City's traffic impact fee in accordance with Chapter 16.20 of the Redding Municipal Code, which is collected prior to the initiation of construction.

PUBLIC REVIEW DISTRIBUTION

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

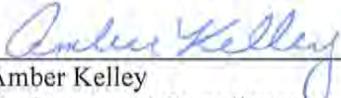
- State Clearinghouse
- Shasta County Clerk
- California Department of Transportation District 2
- California Department of Fish and Wildlife District 1
- Central Valley Regional Water Quality Control Board
- California Native Plant Society

- California Highway Patrol
- Native American Heritage Commission
- State Office of Historic Preservation
- All property owners within 300 feet of the property boundary

PUBLIC REVIEW

- (X) Draft document referred for comments 11/9/2018–12/10/2018
date
- () No comments were received during the public review period.
- () Comments were received but did not address the draft Mitigated Negative Declaration findings or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.
- () Comments addressing the findings of the draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public review period. The letters and responses follow (see Attachment D, Response to Comments).

Copies of the Mitigated Negative Declaration, the Initial Study, documentation materials, and the Mitigation Monitoring Program may be obtained at the Public Works, Engineering Department, City of Redding, 777 Cypress Avenue, Redding, CA 96001. Contact: Amber Kelley, Environmental Compliance Manager, (530) 225-4046 or akelley@cityofredding.org.

Date of
Draft Report: November 9, 2018 By: 
Name/ Title: Amber Kelley
Environmental Compliance Manager

Date of
Final Report December 31, 2018

Attachments:

- A. Project Location Map/Project Footprint/Study Routes
- B. Initial Study
- C. Mitigation Monitoring and Environmental Commitment Program
- D. Comments and Response to Comments (will be appended to final MND if comments are received during public scoping)

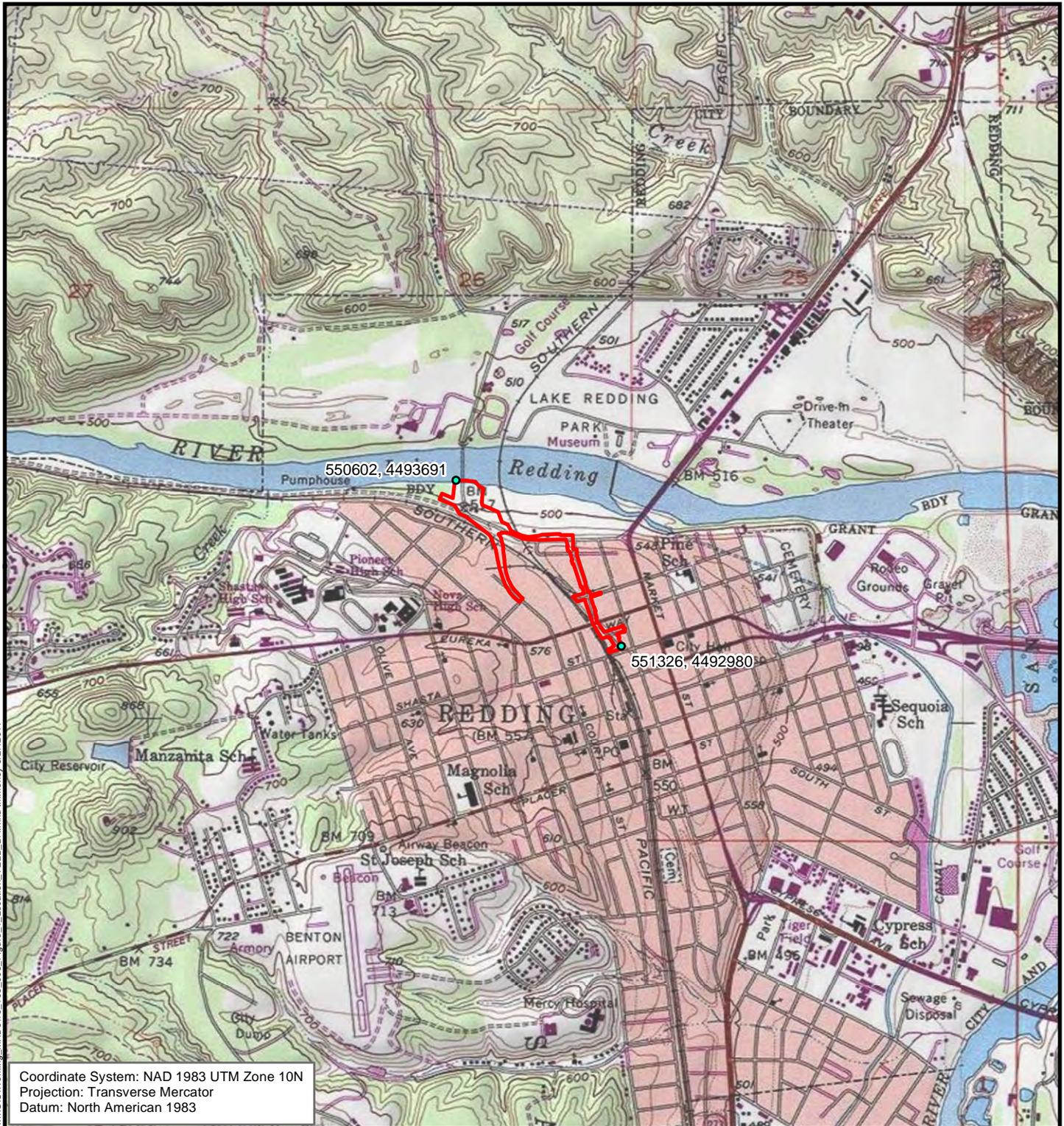
ATTACHMENT A

Figure 1 –Study Area Location

Figure 2 – Proposed Project Layout Mapbook

Figure 3 – Study Routes

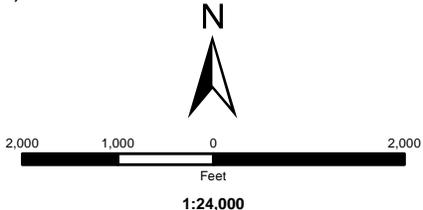
GIS\Projects\15_105_006_Diestelhorst to Downtown\GIS\Working_MXD\15_105_006_Figure 1_Location_VELB_BA.mxd tmmoney 9/27/2017



Coordinate System: NAD 1983 UTM Zone 10N
 Projection: Transverse Mercator
 Datum: North American 1983

 Biological Study Area (15.32 acres)

Public Land Survey:
 Land Grant: San Buenaventura
USGS 7.5 Quad:
 Redding - Revised 1969



Study Area Location

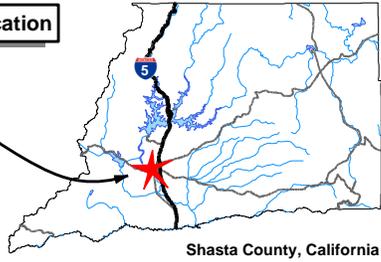
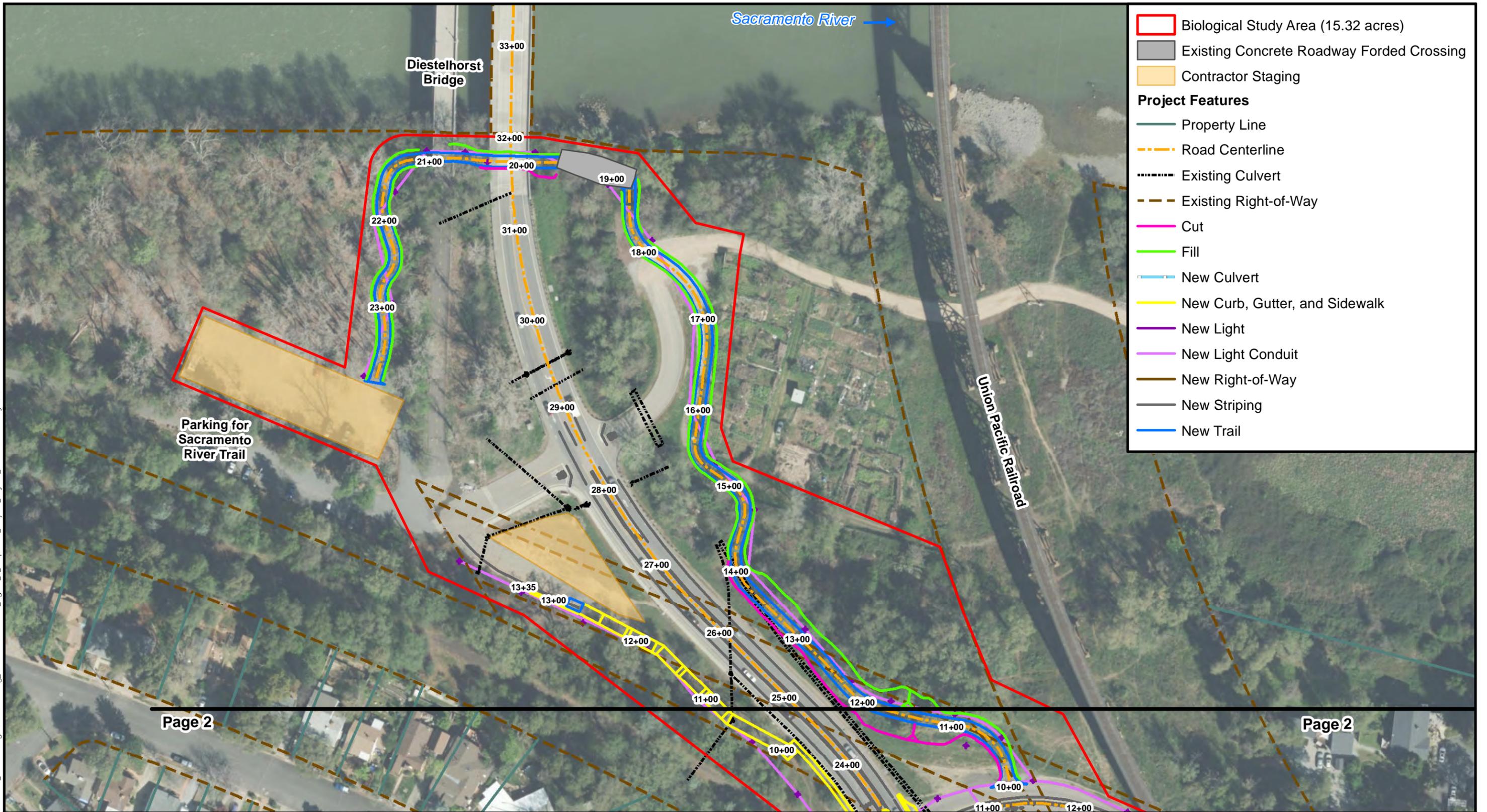


Figure 1
Study Area Location

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- Biological Study Area (15.32 acres)
- Existing Concrete Roadway Forded Crossing
- Contractor Staging

Project Features

- Property Line
- Road Centerline
- Existing Culvert
- Existing Right-of-Way
- Cut
- Fill
- New Culvert
- New Curb, Gutter, and Sidewalk
- New Light
- New Light Conduit
- New Right-of-Way
- New Striping
- New Trail

Page 2

Page 2

Prepared by:

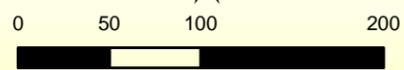


5000 Bechell Lane Suite 203
Redding, CA 96002 Phone (530) 222-5347
Fax (530) 222-4958

Prepared for:

City of Redding
P.O. Box 496071
Redding, CA 96049



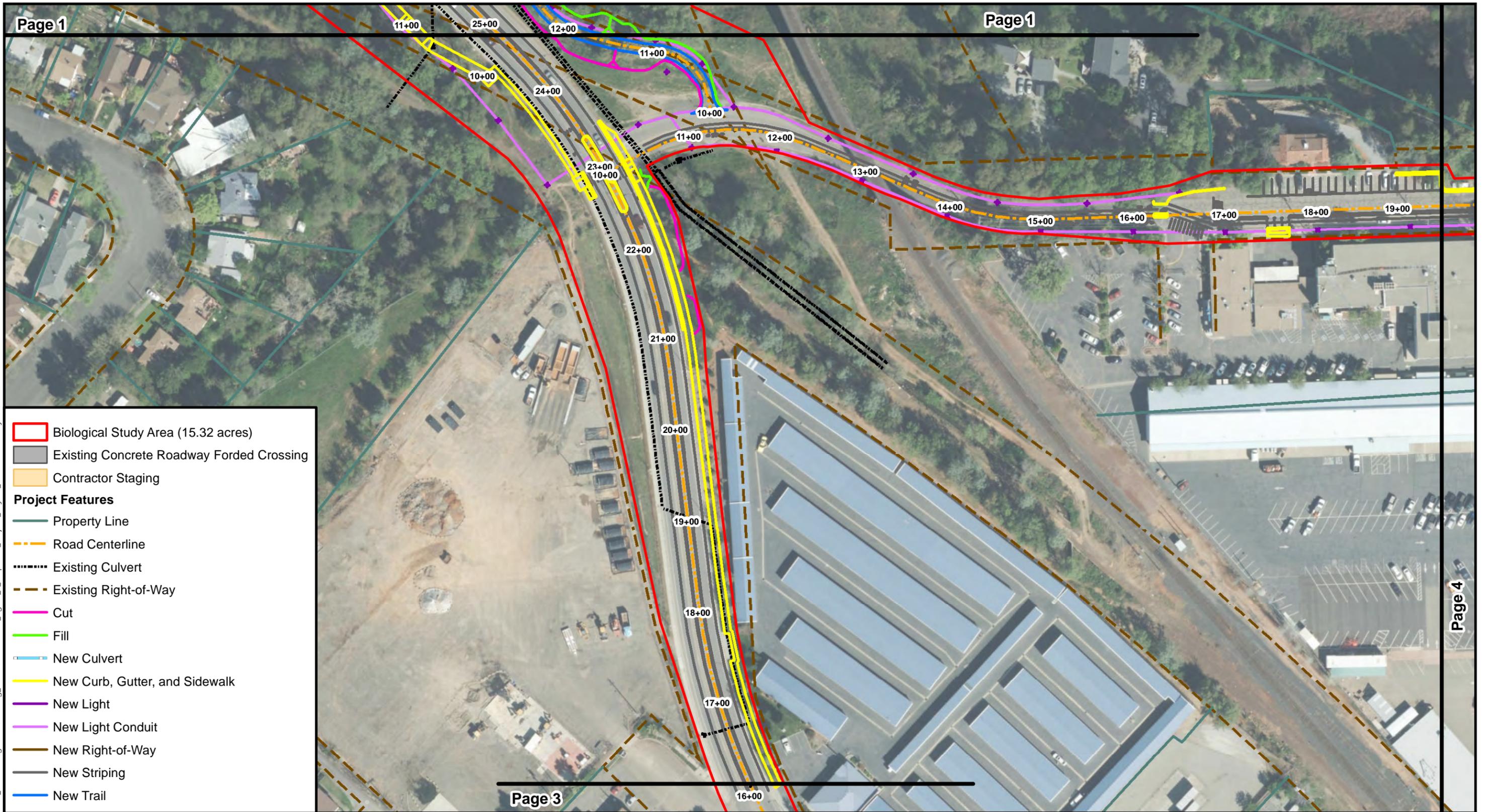


 Feet
 1 inch = 100 feet

**Diestelhorst to Downtown Non-Motorized Improvement
Project ATPL-5068(055)**

**Figure 2
Proposed Project Layout**

Page 1 of 6 April 3, 2018



- Biological Study Area (15.32 acres)
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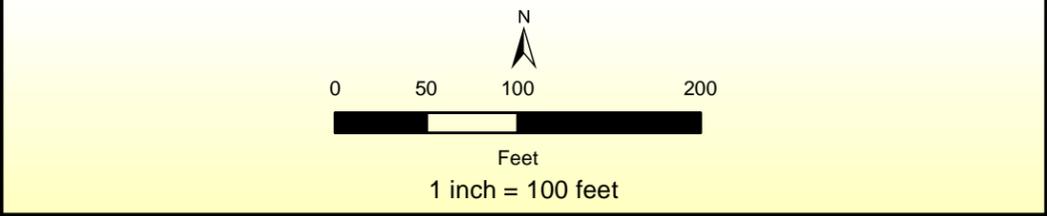
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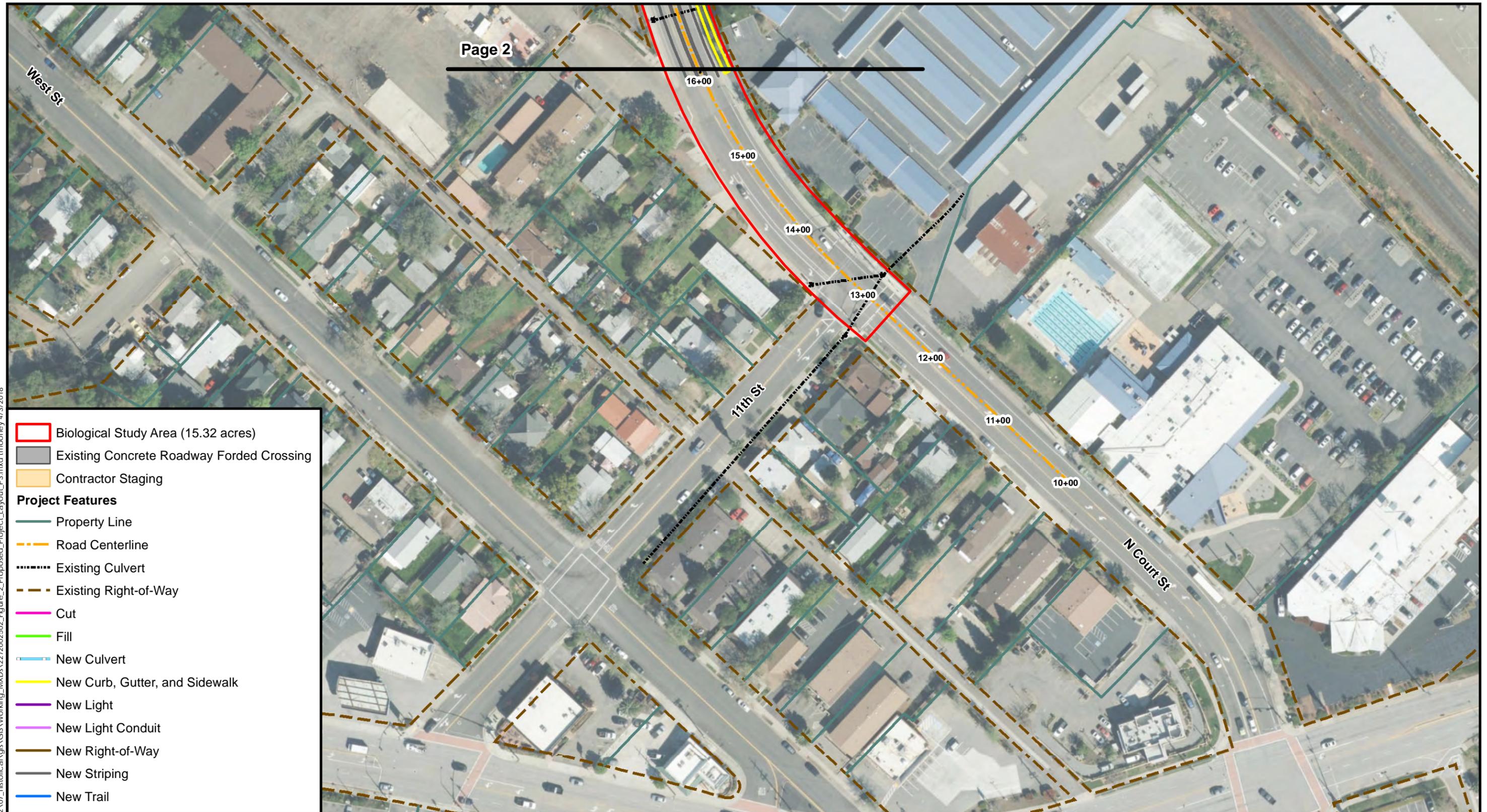


**Diestelhorst to Downtown Non-Motorized Improvement
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**Figure 2
 Proposed Project Layout**

Page 2 of 6
 April 3, 2018

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- Biological Study Area (15.32 acres)
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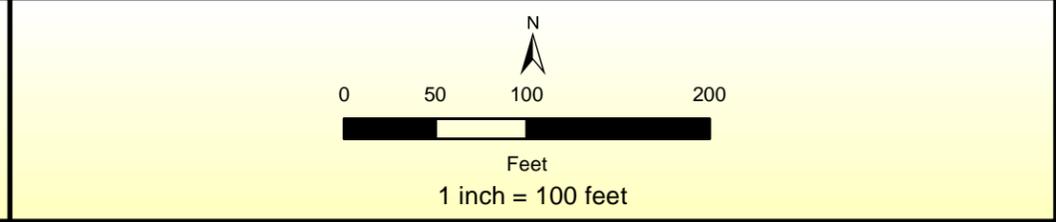
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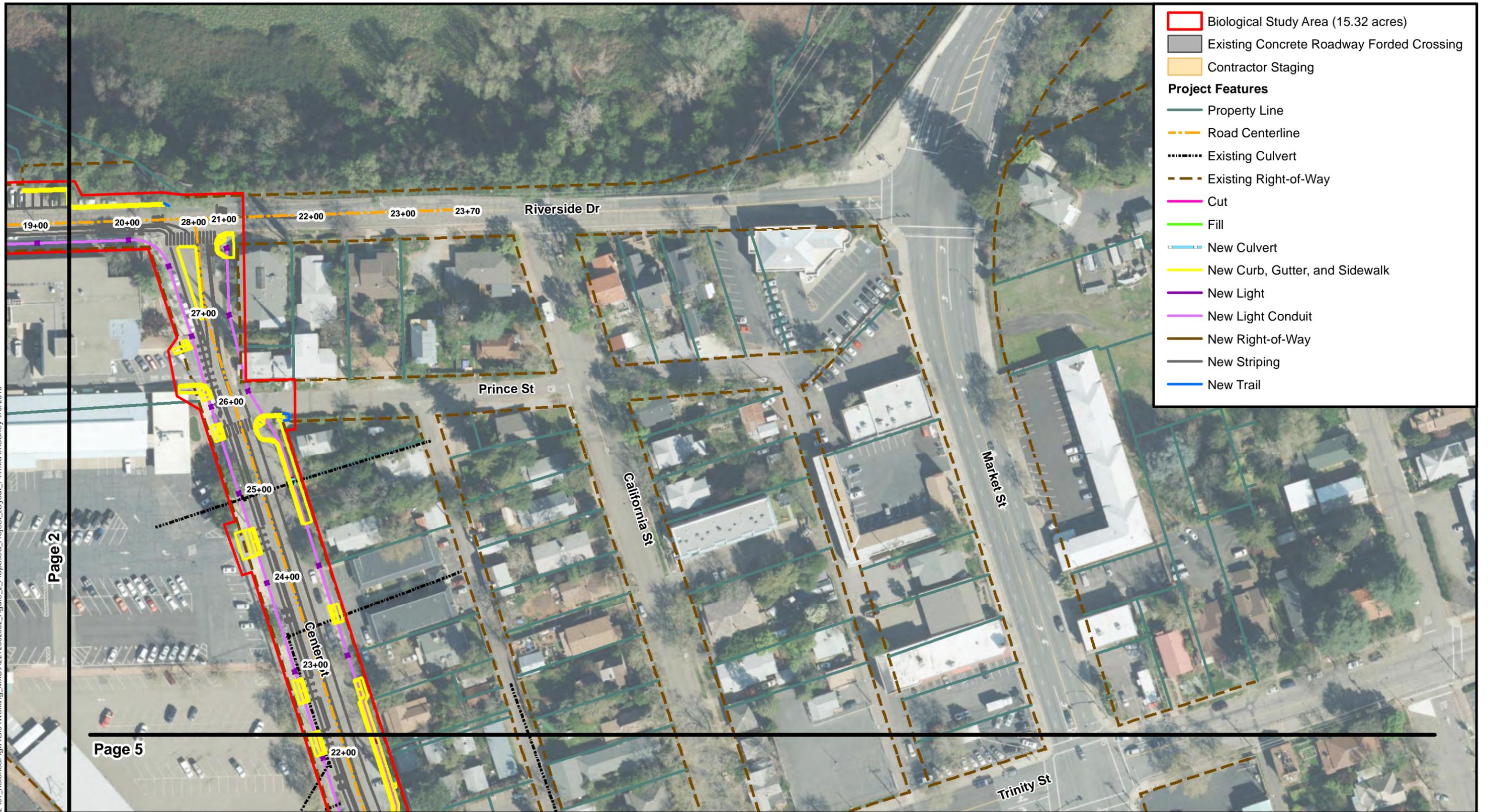
**Diestelhorst to Downtown Non-Motorized Improvement
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**Figure 2
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Page 3 of 6
 April 3, 2018

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Page 2

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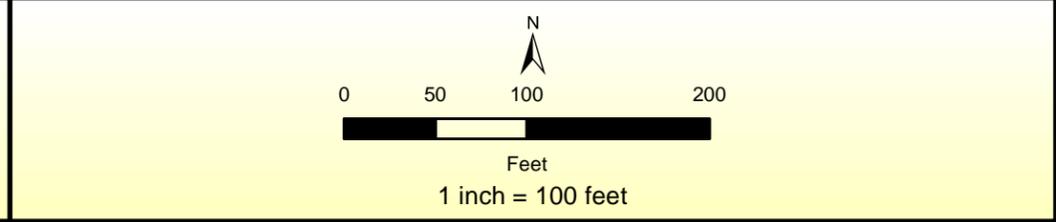
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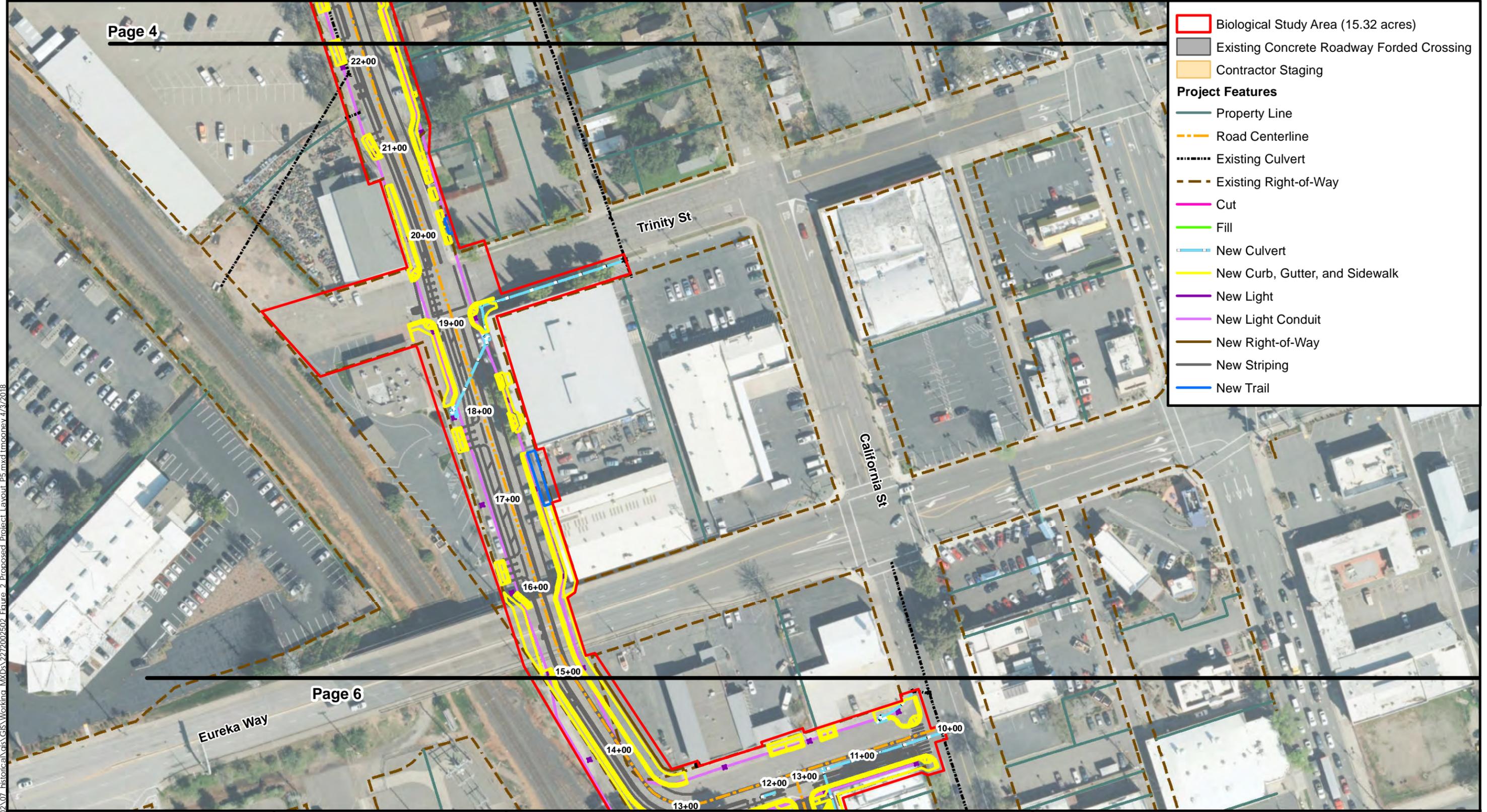
**Diestelhorst to Downtown Non-Motorized Improvement
 Project ATPL-5068(055)**

**Figure 2
 Proposed Project Layout**

Page 4 of 6 April 3, 2018

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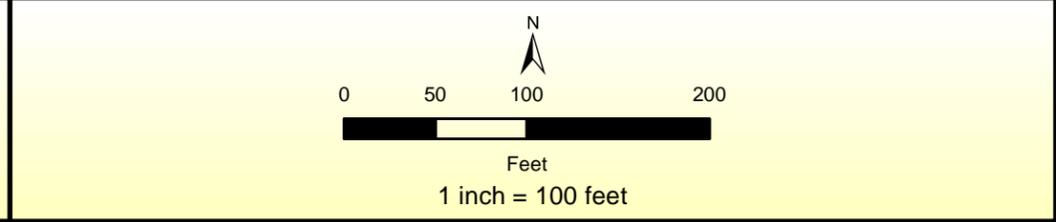
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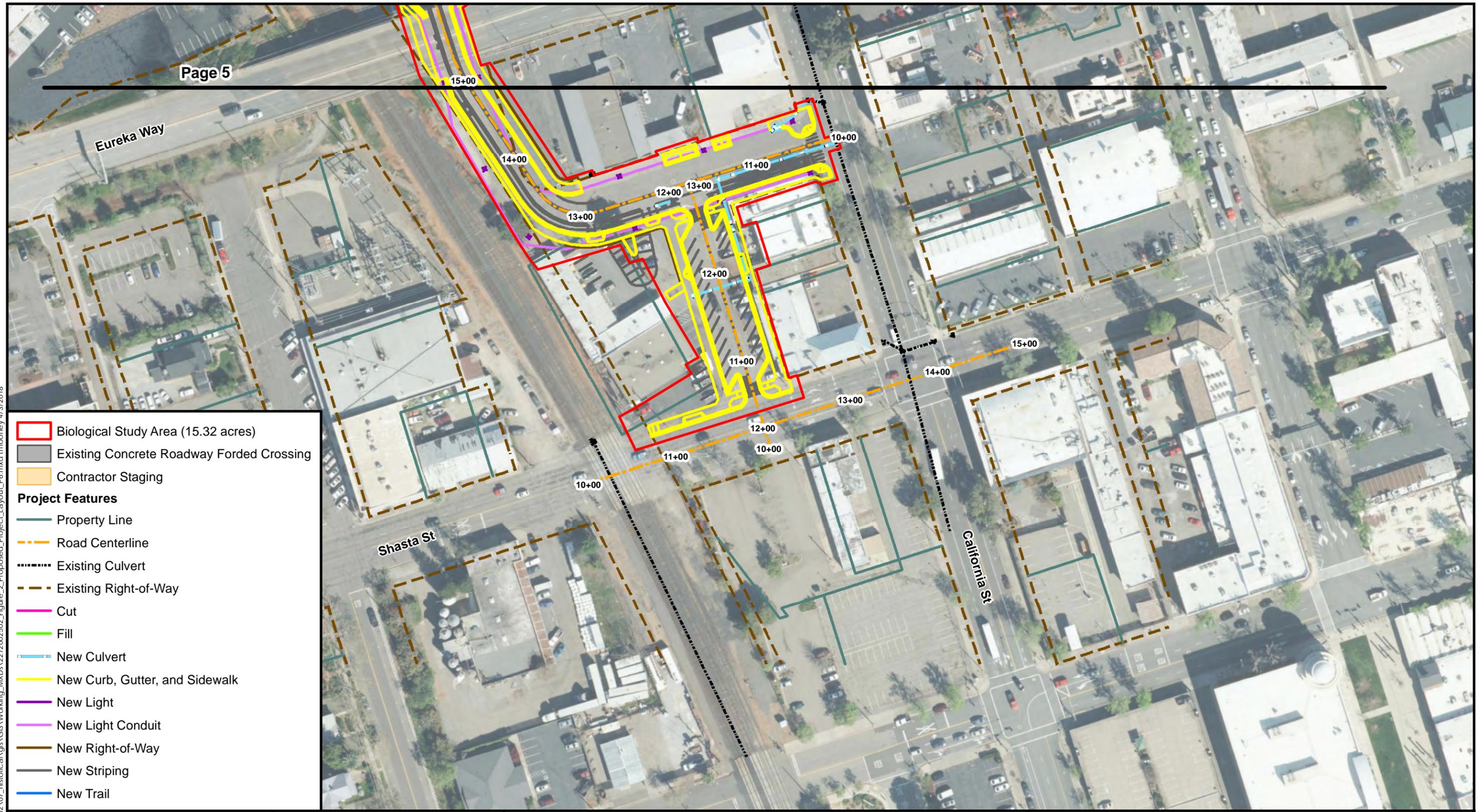
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**Diestelhorst to Downtown Non-Motorized Improvement
 Project ATPL-5068(055)**

**Figure 2
 Proposed Project Layout**

Page 5 of 6 **April 3, 2018**



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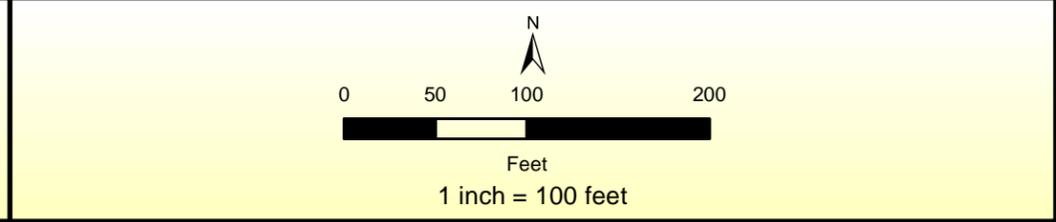
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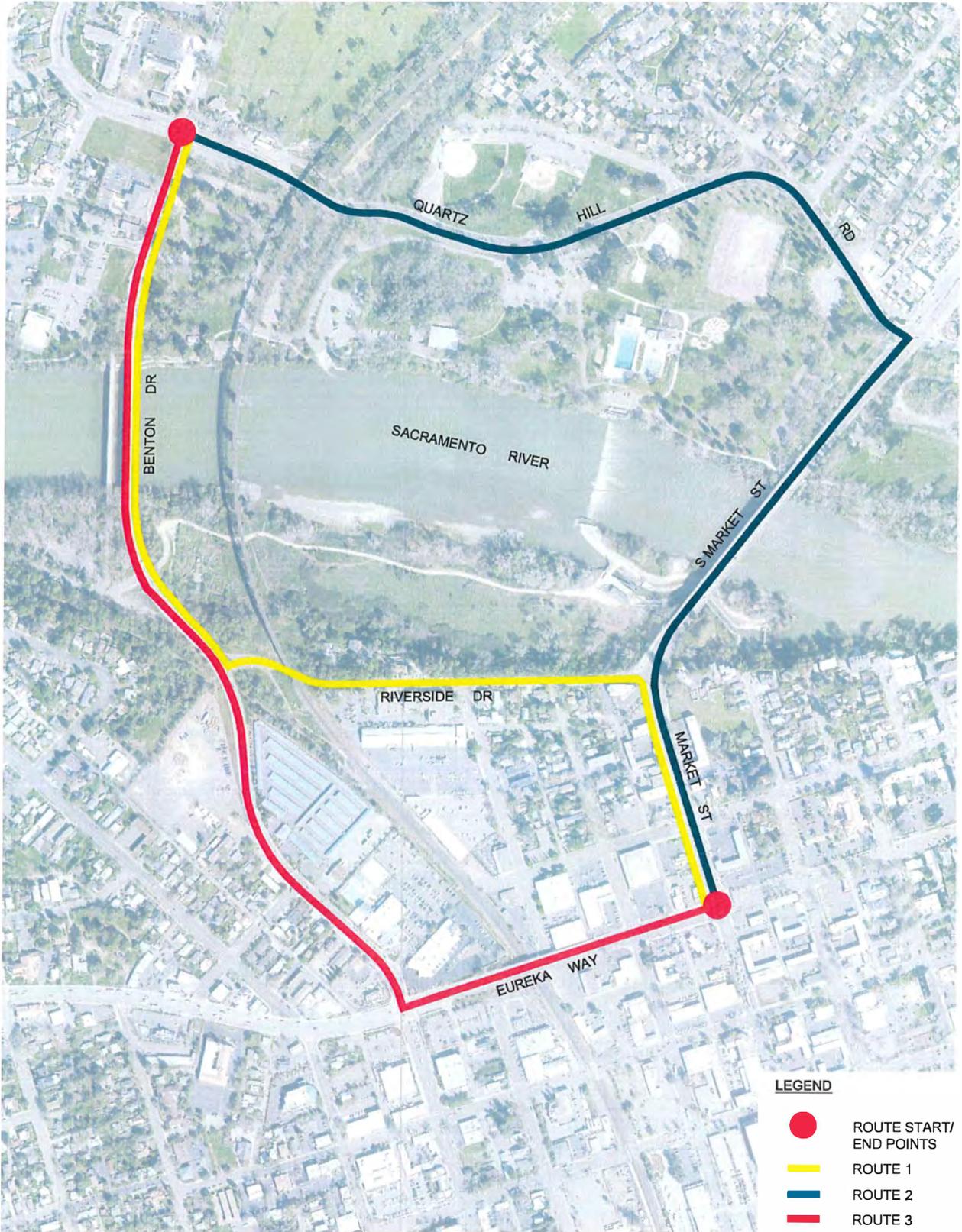
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**Figure 2
 Proposed Project Layout**

Page 6 of 6
 April 3, 2018



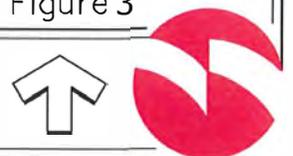
LEGEND

- ROUTE START/ END POINTS
- ROUTE 1
- ROUTE 2
- ROUTE 3

Diestelhorst to Downtown Non-Motorized Improvements

Figure 3

Study Routes



ATTACHMENT B

Initial Study

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY- FINAL

Diestelhorst to Downtown Non-Motorized Improvement Project



Prepared by:

**CITY OF REDDING
Public Works Department
777 Cypress Avenue
Redding, California 96001**

December 2018

CITY OF REDDING ENVIRONMENTAL CHECKLIST FORM

1. Project Title: Diestelhorst to Downtown Non-Motorized Improvement Project

2. Lead agency name and address:

CITY OF REDDING
Public Works Department
777 Cypress Avenue
Redding, CA 96001

3. Contact Person and Phone Number: Amber Kelley, Environmental Compliance Manager,
(530) 225-4046

4. Project Location:

The proposed project is in the city of Redding, Shasta County, California. The proposed project area includes the area from North Court Street from its intersection with 11th Street to just northwest of the south bank of the Sacramento River (near Diestelhorst Bridge); Riverside Drive between North Court Street and Center Street; and Center Street southeast to Shasta Street. The proposed project is situated in a mixed open space and urban area immediately adjacent to the Sacramento River, and commercial and residential properties. It is shown on the *Redding, California* 7.5-minute U.S. Geological Survey (USGS) quadrangle in the San Buena Ventura Colonial Land Grant at 40.589106°N and -122.395754°W. (See Attachment A, Figure 1, Project Location Map.)

5. Applicant's Name and Address:

CITY OF REDDING
Public Works Department
777 Cypress Avenue
Redding, CA 96001

Representative's Name and Address:

Amber Kelley
CITY OF REDDING
Public Works Department
777 Cypress Avenue
Redding, CA 96001

6. General Plan Designation:

- Public Facilities or Institutional (PF-I-S)
- Limited Office (LO)
- General Office (GO)
- General Commercial (GC)
- Residential- 3.5 to 6 Dwelling Units Per Acre (3.5 to 6)
- Residential- 6 to 10 Dwelling Units Per Acre (10 to 20)
- Parks (PK)
- Greenway (GWY)

7. Zoning:

- Open Space District (OS)
- General Office (GO)
- General Commercial (GC)
- Limited Office (LO)
- Public Facility (PF)
- Residential Single Family 3.5 Units Per Acre (RS-3.5)
- Residential Multiple Family 12 Units Per Acre (RS-12)
- Residential Multiple Family 20 Units Per Acre (RS-20)
- Downtown Mixed Use Specific Plan Boundary

8. Description of Project:

The action area for the proposed project is approximately 15.32 acres. The proposed project would consist of a trail connection that starts at the north end of the project area where it would tie into the existing Sacramento River Trail system at the parking lot on the south side of the river, near the Diestelhorst Bridge. Two 12-foot-wide paved trails would be constructed between the parking lot and Riverside Drive. Proposed improvements include sidewalk gap completion, improved intersection facilities, corridor lighting, an enhanced crossing with rapid flashing beacons at Court Street, and a dedicated cycling and pedestrian pathway requiring either a one-way or full closure of Riverside Drive from Court Street to Center Street. Additional project elements include constructing bulb-outs, improving storm drainage along Center Street, slurry sealing along North Court Street and Riverside Drive, an asphalt concrete overlay, striping, sign replacement, and overhead utility relocation. Most of the work would occur in the City's right of way; however, a minor amount of utility acquisition would be required. It is anticipated that construction would take one season and is planned for 2020.

One of the trail alignments crosses Court Street at its intersection with Riverside Drive. Safety enhancements would be installed, including a refuge island, enhanced striping, and pedestrian-activated rapid flashing beacons. Enhanced and buffered striping would be placed north- and southwards on Court Street to help ensure adequate speed reduction at the crosswalk. The second trail would travel under Diestelhorst Bridge and the Court Street/Benton Drive bridge then turn south and run along the east side of Court Street connecting with Riverside Drive just west of the Union Pacific railroad tracks. Additional project elements include constructing bulb-outs, improving storm drainage along Center Street, slurry sealing along North Court Street and Riverside Drive, an asphalt concrete overlay, striping, sign replacement, and overhead utility relocation.

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A dedicated cycling and pedestrian pathway requiring either a one-way (partial) or full closure of Riverside Drive from Court Street to the intersection of Center Street is proposed. To evaluate the potential environmental impacts of each option, two project alternatives were identified.

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Alternative 2 (Preferred Alternative) – This alternative includes all project improvements and features identified above and would require a full closure of Riverside Drive from Court Street to Center Street. Vehicle access would be limited to the businesses located in the eastern portion of the road closure. Alternative 2 is the preferred alternative.

The proposed project design, including staging areas, is shown on Attachment A, Figure 2, Project Footprint.

9. Surrounding Land Uses and Setting:

The proposed project area generally flows through a mixed-use area including residential, commercial, and open space regions. The trail would parallel North Court Street, Riverside Drive, and Center Street and would flow from open space into the downtown area of Redding. Diestelhorst Bridge lies just the north of the proposed project and the Union Pacific Railroad immediately parallels North Court Street on the east. Adjacent to the project area are rural residential developments and commercial to the east, south, and west and the Sacramento River and open space to the north.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- Federal Highway Administration
- U.S. Army Corps of Engineers (Sacramento District)
- United States Fish and Wildlife Service California Department of Fish & Wildlife (Region 1)
- California Regional Water Quality Control Board (Central Valley Region 5-Redding)
- California Department of Fish and Wildlife (Region 1)
- California Department of Transportation (District 2)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project.

	Aesthetics		Agricultural and Forestry Resources		Air Quality
x	Biological Resources		Cultural Resources		Geology/Soils
	Greenhouse Gas Emissions		Hazards & Hazardous Materials		Hydrology/Water Quality
	Land Use/Planning		Mineral Resources		Noise
	Population/Housing		Public Services		Recreation
x	Transportation/Traffic		Tribal Cultural Resources		Utilities/Service Systems
	Mandatory Findings of Significance				

DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

Based on the initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Copies of the Initial Study and related materials and documentation may be obtained at the Engineering Division of the Public Works Department, 777 Cypress Avenue, Redding, CA 96001. Contact Amber Kelley at (530) 225-4046 or akelley@cityofredding.org.



Amber Kelley
Environmental Compliance Manager
Public Works – Engineering

December 31, 2018

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

This section analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated in this Initial Study include:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities/Service Systems
- Mandatory Findings of Significance

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the State *CEQA Guidelines* and used by the City of Redding in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- No Impact. The development will not have any measurable environmental impact on the environment.
- Less Than Significant Impact. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are significant.
- Potentially Significant Impact Unless Mitigation Incorporated. The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- Potentially Significant Impact. The development will have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures will be required, so that impacts may be avoided or reduced to insignificant levels.

Prior environmental evaluations applicable to all or part of the project site:

- City of Redding General Plan, 2000
- City of Redding General Plan Final Environmental Impact Report, 2000, SCH #1998072103

LIST OF ATTACHMENTS/REFERENCES

Attachment A

Figure 1 – Study Area Location

Figure 2 – Proposed Project Layout Mapbook

Figure 3 – Study Routes

I. AESTHETICS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

- a) The project will comply with the height standards of the City’s Zoning Ordinance for any permanent project features. The project consists of a new paved trail and associated project components that would tie into the existing Sacramento River Trail. The project would be consistent with the existing aesthetic as experienced from nearby homes and businesses, public recreational sites, and by travelers using the local roadways within the project area. There are no scenic areas or resources within the project area. The proposed project would not represent a significant change to the overall scenic quality of the area.
- b) The project site is not located adjacent to a state-designated scenic highway. The Diestelhorst Bridge—a historic-period property eligible for listing in the National Register of Historic Places and California Register of Historical Resources—crosses over but not through the project area. The project would have no impact on the quality of the view of the bridge from surrounding areas, since the project is consistent with existing recreational use on and around the bridge. There are no documented scenic resources in the immediate project area.
- c) The project would be compatible with the existing visual character of the property and its surroundings. Project components would be consistent with the surrounding visual environment, which has been subjected to urban development and recreational open space uses. The addition of the paved pathways and associated project components to the area may slightly modify the visual environment; however, roadways and trails are considered an existing feature in the project area, and the addition of the new pathways and associated project components would not substantially degrade the existing visual character of the area. Further, construction staging areas would be temporary and the area would be restored to pre-project conditions; natural regrowth of vegetation would be allowed to occur. Impacts of the proposed project on the existing visual character and quality of existing views would be less than significant.
- d) Construction of the project may involve the use of temporary safety and security lighting at intersections and in staging areas. The completed project would include permanent corridor

lighting as well as rapid flashing beacons at North Court Street. Both temporary construction lighting and permanent project lighting will comply with the City’s Zoning Ordinance light standards that require light shielding. Although there are a few homes and businesses adjacent to parts of the project area, none would be impacted using these types of lights. Project lighting would be consistent with existing lighting sources used on area roads and trails. Potential glare from reflective signage, pavement striping, and trail surfaces would be similar to levels emitted by existing roads and trails. Construction equipment, machinery, and bright colored traffic control signage may temporarily increase light and glare in the project area during construction. Operational and construction impacts on day or nighttime views in the area because of project lighting would be less than significant.

Documentation

- City of Redding General Plan, Natural Resources Element, 2000
- City of Redding Zoning Ordinance, Chapter 18.40.090
- California Department of Transportation, California Scenic Highway Mapping System. Updated September 7, 2011.

Mitigation

None necessary.

<p>II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural, Land Evaluation and Site Assessment Mode (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided bin Forest Protocols adopted by the California Air Resources Board. Would the project:</p>	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
<p>a) Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural, Land Evaluation and Site Assessment Mode (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-e) The project area does not include any designated farmland or timberlands. According to the California Department of Conservation’s Farmland Mapping and Monitoring Program (FMMP) no lands within the project area are under Williamson Act contracts and no lands are mapped as Important Farmlands. The project would not convert any farmland to non-agricultural use, or any forestland to non-forest use.

Documentation

- City of Redding General Plan, Natural Resources Element, 2000
- City of Redding GIS Parcel and Zoning Map Viewer

- California Department of Conservation, Farmland Mapping and Monitoring Program, United States Department of Agriculture, Soil Conservation Service and Forest Service, Soil Survey of Shasta County Area.

Mitigation

None necessary.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a-c) Air pollution controls will conform to Caltrans Standard Specifications, which state that the contractor shall comply with all applicable air pollution control rules, regulations, ordinances, and statutes. City standards (implemented through the Grading Ordinance and Uniform Building Code) require implementation of the following conservation measures and best management practices (BMPs) that contribute to achieving the City’s goal of at least a 20 percent reduction in emissions or the best reduction otherwise feasible. The following standard conservation measures and BMPs will be used during construction to limit dust and PM₁₀ emissions:
- **AQ-1.** Nontoxic soil stabilizers shall be applied according to manufacturer’s specification to all inactive construction areas.

- **AQ-2.** All grading operations shall be suspended when winds (as instantaneous gusts) exceed 20 miles per hour.
- **AQ-3.** Water all stockpiles, access roads, and disturbed or exposed areas, as necessary, to prevent airborne dust.
- **AQ-4.** Water inactive construction sites at least twice daily, or as necessary, to prevent erosion.
- **AQ-5.** Pursuant to the California Vehicle Code (Section 23114(e)(4)) (California Legislative Information 2016), all trucks hauling soil and other loose material to and from the construction site shall be covered or shall maintain at least 6 inches of freeboard (i.e., minimum vertical distance between top of load and the trailer).
- **AQ-6.** All public roadways used by the project contractor shall be maintained free from dust, dirt, and debris caused by construction activities. Streets shall be swept at the end of the day if visible soil materials are carried onto adjacent public paved roads.

The proposed project consists of a new non-motorized recreational trail connection between Diestelhorst Bridge and the downtown Redding area. The completed project would not result in the increased use of motor vehicles. Shasta County, including the far northern Sacramento Valley, currently exceeds the state's ambient standards for ozone (smog) and particulates (fine, airborne particles). Consequently, these pollutants are the focus of local air quality policy, especially when related to land use and transportation planning. Even with application of measures to reduce emissions for individual projects, cumulative impacts are unavoidable when ozone or particulate emissions are involved. For example, the primary source of emissions contributing to ozone is from vehicles. Any project that generates vehicle trips has the potential to incrementally contribute to the problem. The Environmental Impact Report for the City's *General Plan* acknowledged this dilemma; and as a result, the City Council has adopted *Findings* and a *Statement of Overriding Considerations* for impacts on air quality resulting from growth supported under the *General Plan*.

The operation of project construction equipment would result in limited temporary emissions of Reactive Organic Gases (ROG) and oxides of nitrogen (NO_x), which are ozone precursors, and inhalable particulate matter, 10 micron (PM₁₀). The new trail and other project features would involve one season of construction (typically May 1 to October 31) in 2020. Because the project itself is a non-motorized trail with a relatively narrow linear footprint requiring limited construction activities and equipment for its construction, it would be classified as a minor project in accordance with the City's General Plan findings. The adherence to standards and BMPs set forth by Caltrans and the City further illustrates the size and scope of construction activities that would result in unmitigated emissions less than the 25 pounds per day of NO_x, 25 pounds per day of ROG, and 80 pounds per day of PM₁₀ Level "A" mitigation thresholds identified as part of the City's General Plan. The project would be consistent with the City's emission-reduction goals of 20 to 25 percent established in the Air Quality Element of the *General Plan*.

The proposed project would have no impact on air quality plans or policies. The project’s cumulative contribution to criteria pollutants in a non-attainment area would be less than significant.

- d) Potential impacts on neighboring homes and commercial businesses (sensitive receptors) because of construction-related fugitive dust would be temporary, localized, and minor. Project operation would have no impact on air quality experienced by sensitive receptors. Further, adherence with Caltrans and City specifications outlined in conservation measures and BMPs AQ-1 through AQ-6, above, would restrict emissions to below significant levels. There are no other sensitive receptors (e.g., hospitals, schools) in the immediate project vicinity. Therefore, any resulting impact would be less than significant.
- e) The project would not involve land use that could generate objectionable odors affecting a substantial number of people.

Documentation

- Shasta County APCD Air Quality Maintenance Plan and Implementing Measures
- City of Redding General Plan, Air Quality Element, 2000
- City of Redding General Plan Final Environmental Impact Report, 2000, SCH #1998072103, Chapter 8.6, Air Quality,
- CEQA Findings of Fact and Statement of Overriding Considerations for the City of Redding General Plan Final Environmental Impact Report, as adopted by the Redding City Council on October 3, 2000, by Resolution 2000-166
- California Air Resources Board. 2017. Area designations maps/state and national. <http://www.arb.ca.gov/desig/adm/adm.htm> (accessed July 19, 2018).

Mitigation

None necessary.

<p>IV. BIOLOGICAL RESOURCES: Would the project:</p>	<p><i>Potentially Significant Impact</i></p>	<p><i>Less-Than-Significant with Mitigation Incorporated</i></p>	<p><i>Less-Than-Significant Impact</i></p>	<p><i>No Impact</i></p>
<p>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

IV. BIOLOGICAL RESOURCES: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) A Natural Environment Study (NES) report (Stantec 2018), including a summary of findings of the single visit protocol-level botanical survey, a habitat assessment survey for VELB, a biological reconnaissance survey, and delineation of waters of the United States, was prepared to assess the impacts of the proposed project on biological resources in the project area and vicinity. Impact assessment is categorized by plant species, fish species, and wildlife species as follows:

Special-status Plant Species

The following federal and state listed plant species have the potential to occur in or adjacent to the project area:

- Big-scale balsamroot (*Balsamorhiza macrolepis*) – California Native Plant Society (CNPS) list 1B.2 (moderately threatened in California)

- Silky cryptantha (*Cryptantha crinite*) – CNPS list 1B.2 (moderately threatened in California)

Desktop analysis revealed that two special-status plants have potential to occur within the project area including the big-scale balsamroot and the silky cryptantha. However, based on the botanical survey conducted on May 17, 2017, no special-status plants were found to occur within the project area. The botanical survey was conducted during the correct identification period for the special-status plant species with potential to occur in the project area (i.e. March through June). Therefore, implementation of the proposed project would not adversely affect special-status plant species and no mitigation is required.

Special-status Fish Species

The following federal and state listed fish species have the potential to occur in or adjacent to the project area:

- Pacific Southern DPS green sturgeon (*Acipenser medirostris*)- federally listed as threatened, state species of special concern
- California Central Valley DPS steelhead (*Oncorhynchus mykiss irideus*)- federally listed as threatened, critical habitat
- Central Valley spring-run ESU chinook salmon (*Oncorhynchus tshawytscha*)- federally listed as threatened, critical habitat, state listed as threatened
- Sacramento River Winter-run ESU chinook salmon (*Oncorhynchus tshawytscha*)- federally listed as endangered, critical habitat, state listed as endangered

The Sacramento River occurs along the north edge of the project area and provides habitat for several special-status fish species. The proposed project has the potential to cause take of special-status anadromous salmonids if it results in any one of the following: direct mortality; temporary impacts on habitats such that special-status species suffer from injury, lowered reproductive success, increased stress, lessened fitness, or mortality; permanent loss of habitat critical to a special-status fish species; or a substantial reduction in the quantity or value of fish habitat in which a special-status population occurs. However, implementation of the proposed project would have no direct effect on fish or their habitat; the project would avoid direct impacts on waters of the United States. Indirect impacts on fish and their habitat could occur due to erosion and sedimentation, accidental fuel leaks, or spills of pollutants. Conservation measures and standard BMPs HAZ-1 through -5 included in Section VIII, Hazards and Hazardous Materials, will be included in the project to minimize the potential for accidental fuel leaks and spills. In addition, the following standard conservation measures and BMPs will be used during project construction to minimize the potential for impacts on special-status fish or their habitat:

- **BIO-1.** A Stormwater Pollution Prevention Plan (SWPPP), as required by the *City of Redding Stormwater Quality Management and Discharge Control Ordinance*, will be prepared to address BMPs that will be used to prevent erosion and sediment loss within

the project site. BMPs such as silt fence, mulching and seeding, and straw wattles will be placed where needed to prevent sediment from leaving the site during and after construction.

- **BIO-2.** High visibility fencing, flagging, or markers will be installed along the edges of the work zone near waters of the United States outside the construction area. All work and stockpiling of materials will be confined to the project disturbance area.
- **BIO-3.** Appropriate sediment control measures (e.g., silt fences, straw wattles) shall be in place prior to the onset of construction activities within waters of the United States and in project areas where there is a potential for surface runoff to drain into waters of the United States and as required by the SWPPP. Sediment control measures shall be monitored and maintained until construction activities have ceased. Temporary stockpiling of excavated or imported material shall be placed as far away from waters of the United States as practicable. Excess soil shall be used on site or disposed of at a regional landfill or other appropriate facility. Stockpiles that are to remain on the site through the wet season shall be protected to prevent erosion (e.g., silt fences, straw bales) as required in the SWPPP.

Special-status Wildlife Species

The following federal and state listed wildlife species have the potential to occur in or adjacent to the project area:

- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)- federally listed as threatened
- Foothill yellow-legged frog (*Rana boylei*)- state listed as a species of special concern, state candidate species
- Western pond turtle (*Emys marmorata*)- state species of special concern
- Bald Eagle (*Haliaeetus leucocephalus*)- federally listed as delisted, state listed as endangered, state listed as fully protected
- White-tailed kite (*Elanus leucurus*)- state listed as fully protected
- Yellow-breasted chat (*Icteria virens*)- state species of special concern
- Yellow warbler (*Setophaga petechial*)- state species of special concern
- Pallid bat (*Antrozous pallidus*)- state species of special concern
- Western red bat (*Lasiurus blossevillii*)- state species of special concern
- Townsend’s western big-eared bat (*Corynorhinus Townsendii*)- state species of special concern
- Ring-tailed cat (*Bassariscus astutus*)- state listed as fully protected

Valley Elderberry Longhorn Beetle (VELB). VELB is found exclusively on elderberry shrubs. Thus, protection of this beetle is based on protection of the elderberry shrub. USFWS has recently updated its guidance for assessing impacts on VELB in its *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (U.S. Fish and Wildlife Service 2017). According to the USFWS’s new guidance, if elderberry shrubs occur on or within 165 feet of the project area, adverse effects to VELB may occur because of project implementation. The guidance also recommends maintaining a 20-foot avoidance buffer from all shrubs. Stantec

conducted a habitat assessment survey for elderberry shrubs occurring within 165 feet of proposed construction activities. Survey results indicated 12 elderberry shrubs occur on or within 165 feet of the BSA in valley foothill riparian and valley oak woodland habitat in the northern portion of the BSA. A total of 81 stems equal to or greater than 1-inch diameter at ground level were recorded. A total of four VELB exit holes were observed in four separate elderberry stems. According to CNDDDB VELB has been reported within a 10-mile radius of the BSA.

A Biological Assessment (BA) (Stantec 2018) was prepared for submission to the United States Fish and Wildlife Service (USFWS) to address potential impacts on the VELB pursuant to the federal Endangered Species Act (ESA). A biological opinion (#08ESMF00-2018-F-1631-1) received from USFWS on June 29, 2018 supported the determination reported in the BA that the proposed project *may affect and is likely to adversely affect* VELB. The BA described VELB habitat occurring in the study area, potential impacts from project implementation, avoidance and minimization measures to minimize impacts, and compensatory mitigation for unavoidable impacts. The proposed project is not within designated or proposed critical habitat for VELB.

The project was designed to avoid direct impacts to all shrubs except at one location where three stems greater than 1 inch would be removed to bring the grade of the proposed trail into compliance with Americans with Disabilities Act (ADA) standards. MM-1 will be implemented to ensure any impacts on VELB are limited by requiring construction limitations including limiting removal and branch trimming, as well as providing measures for any transplanting that may be required.

Project activities would occur near (within 20 feet of the dripline) elderberry shrubs at a second location. However, the shrubs sit on a berm above the elevation of the proposed trail. Also, the trail would be constructed on an existing compacted dirt road near the shrubs and the proposed trail lighting was redesigned to provide a 20-foot buffer from the shrubs. The project is not anticipated to affect the shrubs at this location. The remaining shrubs in the BSA and vicinity occur outside the 20-foot avoidance buffer. Potential impacts on VELB would be reduced to a less-than-significant level with the implementation of MM-1 through -6.

Foothill yellow-legged frog. The project could adversely affect foothill yellow-legged frog if individuals were present in the project area during construction. Potential direct effects include harassment, injury, and mortality of individuals due to equipment and vehicle traffic. The species may also be affected if construction activities result in degradation of aquatic habitat and water quality due to erosion and sedimentation, and accidental fuel leaks or spills.

An occurrence of foothill yellow-legged frog was reported within a 10-mile radius of the project area. Construction adjacent to the Sacramento River or the unnamed intermittent stream could result in indirect impacts on foothill yellow-legged frog. Direct impacts on foothill yellow-legged frog are not anticipated as no instream construction is proposed. Indirect impacts could occur if construction activities result in degradation of aquatic habitat and water quality due to erosion and sedimentation, accidental fuel leaks, and spills. In addition to standard conservation measures and BMPs BIO-1 through -3 (described above under Special-status Fish), and HAZ-1 through -5 included in Section VIII, Hazards and Hazardous Materials, MM-

7 will also be used to ensure any impacts on foothill yellow-legged frogs would be less than significant.

Western pond turtle. Project impacts on western pond turtle, if present within the project area, would be like those described for foothill yellow-legged frogs. Occurrences of western pond turtle have also been reported within a 10-mile radius of the proposed project site. Direct impacts on western pond turtle could result from construction activities if individuals or turtle nests are in the project area during construction. Indirect impacts could occur if construction activities result in degradation of aquatic habitat and water quality due to erosion and sedimentation, accidental fuel leaks, and spills. Standard conservation measures and BMPs BIO-1 through -3 (described above under Special-status Fish) and HAZ-1 through -5 included in Section VIII, Hazards and Hazardous Materials, will be used in accordance with State standards to ensure any hazardous materials used during construction will be contained and disposed of properly, thus also limiting potential project-related impacts on western pond turtles. In addition, MM-7 and -8 will be used to ensure any impacts on western pond turtles would be less than significant.

Migratory Birds and Raptors. Construction activities would occur during the avian breeding season (generally February through August, depending on the species) and could disturb nesting birds in or adjacent to the project area. Construction-related disturbance could result in the incidental loss of fertile eggs or nestlings, or nest abandonment. Impacts could result from tree removal, noise from construction activities, as well as ground disturbance such as grubbing and grading.

Construction of the new pathways and associated project features would result in a permanent loss of 0.06 acre of valley foothill riparian habitat and 0.22 acre of valley oak woodland habitat; however, abundant avian nesting and foraging habitat would be retained within the project area, and similarly suitable habitat occurs in the project vicinity. Temporary construction impacts on habitat that may be used by migratory birds would include 0.01 acre of valley foothill riparian habitat and 0.04 acre of valley oak woodland habitat. Foraging birds and birds present in, or adjacent to the project area would not be adversely impacted by construction activities due to their high mobility and available habitat outside of the project area. However, due to the proximity to potential nesting habitat, and potential for special-status migratory birds to occur in the project area, MM-9 and -10 will be used to ensure impacts on migratory bird species are avoided or minimized by limiting tree removal, requiring pre-construction surveys, and use of protection measures for any potential nests found to occur within the project area. MM-9 and -10 will be used to ensure that impacts on migratory birds and raptors would be less than significant.

Special-status bats. Special-status bats including pallid bat, Townsend's big-eared bat, and western red bat may roost individually or in small groups in tree cavities, in riparian vegetation, or under the bridge. Due to the ability of individual bats to move away from disturbance, direct impacts on bats are not expected when the bats are not in a maternity colony. If a tree is removed that contains a maternity colony, the removal could result in mortality or injury of individuals. Indirect impacts may occur from construction disturbance if a maternity colony is present in or adjacent to the project area. Significant noise disturbance could result in adults

temporarily or permanently leaving a maternity colony. Minor tree removal is proposed as part of the proposed project. MM-11 and -12 will be used to ensure project-related impacts on bats including adults, maternity colonies and pre-volant young are volant would be less than significant.

Ring-Tailed Cat. Valley foothill riparian and valley oak woodland habitats located adjacent to the Sacramento River contain potential denning sites for ring-tailed cat, a state fully-protected species under the California Fish and Game Code. Direct impacts on ring-tailed cat could result from vegetation removal if it takes place during the natal and maternal denning period (May 1- June 30). Ring-tailed cats using dens in vegetation slated for removal could perish if vegetation is removed while it is occupied by the animal. Additionally, temporary noise disturbance generated by construction could indirectly affect ring-tailed cats. Since female ring-tailed cats commonly use multiple dens when raising their kits and move kits when disturbed, females using dens outside the area of vegetation removal and ground disturbance would likely move kits to an alternate den if disturbed by construction activities. The mobility of the species makes it possible for ring-tailed cat to be present in the project area, however, no evidence of ring-tailed cat or highly suitable denning habitat was observed during surveys. MMs-13 through -15 will be used to ensure that impacts on ring-tailed cat would be less than significant.

- b) Valley foothill riparian and valley oak woodland habitat are considered sensitive natural communities within the project area. Approximately 2.23 acres of valley foothill riparian habitat and 2.26 acres of valley oak woodland habitat occur within the project area. Construction of the new pathways and associated project features would result in a permanent loss of 0.06 acre of valley foothill riparian habitat and 0.22 acre of valley oak woodland habitat. Approximately 0.01 acre of valley foothill riparian habitat and 0.04 acre of valley oak woodland would be temporarily impacted during project construction. No native tree removal is anticipated in valley foothill riparian habitat, as trail construction would occur on an established unimproved (i.e., barren) path through this community type. Some native tree removal or trimming may be required in valley oak woodland habitat for trail construction, including removal of interior live oak and potentially some smaller valley oaks, along with a blue elderberry shrub that will be transplanted. MM-16 will be used to ensure the potential project-related impacts on sensitive natural communities would be less than significant.
- c) Stantec (formerly North State Resources) conducted a delineation of waters of the United States within the project area on May 23, 2017. Approximately 0.157 acre of waters of the United States occur within the proposed project area including 0.061 acre of riparian wetland, 0.051 acre (321 linear feet) of perennial stream, and 0.045 acre (342 linear feet) of intermittent stream. Federal non-jurisdictional waters were also delineated and include a non-vegetated ditch of approximately 0.017 acre (776 linear feet). Construction and operation of the proposed project would have no direct effect on waters of the United States as the project was designed to avoid direct impacts on such jurisdiction waters.

Indirect impacts could occur due to erosion and sedimentation, accidental fuel leaks, and spills. Conservation measures and BMPs BIO-1 through -3 (described above under Special-status Fish), and HAZ-1 through -5 included in Section VIII, Hazards and Hazardous Materials will be used to ensure that there are no project-related impacts on federally-protected waters.

- d) The proposed project, including the new pathway and associated project features, is not expected to disrupt the habitat connectivity of the open space in proximity to the project area. Although wildlife may avoid the active construction area, the project would not permanently interfere with the movement of native wildlife. The project is outside of waterways, so it would have no impact on migratory fish. MM-9 and -10 will be used to ensure impacts on migratory bird species are avoided or minimized by limiting tree removal, requiring pre-construction surveys, and use of protection measures for any potential nests found to occur within the project area. Impacts on wildlife migratory and travel corridors would be less than significant with the use of MM-9 and -10.
- e-f) There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan covering the proposed project area. The City has adopted a Tree Management Ordinance (Chapter 18.45 of the RMC) that promotes the conservation of mature, healthy trees in the design of new development. The ordinance also recognizes that the preservation of trees sometimes conflicts with necessary land-development requirements. There are no conflicts associated with the project that would prevent implementation of the Tree Preservation Ordinance or other resource protection ordinances. The project would have no impact on any habitat conservation plans.

Documentation

- California Department of Fish and Wildlife: California Natural Diversity Database, 2018
- City of Redding General Plan, Natural Resources Element, 2000
- City of Redding Municipal Code, Chapter 18.45, Tree Management Ordinance
- North State Resources, Inc. (Now Stantec), Natural Environment Study for Diestelhorst to Downtown Non-Motorized Improvement Project, 2018
- Stantec Consulting Services Inc. Biological Assessment, 2018.
- North State Resources, Inc (Now Stantec). Delineation of the Waters of the United States, 2017.
- U.S. Fish and Wildlife Service, Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle. < https://www.fws.gov/sacramento/documents/VELB_Framework.pdf>. Accessed July 25, 2018.

Mitigation

- **MM BIO-1.** The construction limits shall be clearly identified prior to construction and all areas containing elderberry shrubs (*Sambucus nigra*) to be avoided during construction shall be fenced or flagged off.
- **MM BIO -2.** For elderberry shrubs occurring within or immediately adjacent to work locations, 20-foot avoidance buffers shall be established around the driplines of the shrubs to help protect the shrubs and their root zones during project activities. The avoidance buffers shall be maintained for the duration of work activities in the area.
- **MM BIO -3.** To the extent feasible, all activities that occur within 165 feet of an elderberry shrub, shall be conducted outside of the flight season of VELB (March-July).

- **MM BIO -4.** If trimming of elderberry shrubs is required, it shall take place between November and February and will avoid the removal of any branches or stems measuring 1 inch or greater in diameter.
- **MM BIO -5.** Removal of vegetation within the dripline of an elderberry shrub shall be limited to August through February when adults are not active. Removal activities shall avoid damaging the elderberry shrub.
- **MM BIO -6.** The City proposes to transplant three elderberry stems, greater than 1-inch that require removal, to a USFWS approved location. In addition, the City shall also purchase one credit as mitigation for the impacted stems. The following transplanting guidelines are recommended to minimize the chance of adverse effects of VELB during transplanting:
 - Exit-hole surveys shall be completed immediately before transplanting. The number of exit holes found, GPS location of the plant to be relocated, and the GPS location of where the plant is transplanted shall be reported to the Service and to the CNDDDB.
 - Elderberry shrubs shall be transplanted when the shrubs are dormant (November through the first two weeks in February) and after they have lost their leaves. Transplanting shall follow the most current version of the ANSI A300 (Part 6) guidelines for transplanting.
- **MM BIO -7.** If western pond turtle or foothill yellow-legged frogs are encountered in the BSA during construction and could be harmed by construction activities, work will stop in the area and the City will notify CDFW. Upon authorization from CDFW, a qualified biologist may relocate the individual(s) the shortest distance possible to a location containing habitat outside of the work area.
- **MM BIO -8.** If a western pond turtle nest is discovered during construction activities, a qualified biologist shall flag the site and determine if construction activities can avoid affecting the nest. If the nest cannot be avoided, it shall be excavated and relocated to a suitable location outside of the construction impact zone by a qualified biologist in coordination with CDFW. The City shall inform Caltrans when such an activity occurs.
- **MM BIO -9.** If vegetation removal or construction activities will occur during the nesting season for birds (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey 7 days before construction activities begin. If nesting birds are found, CDFW will be notified and consulted. An appropriate buffer, as determined by CDFW and the qualified biologist, will be placed around the nest until the young have fledged.
- **MM BIO -10.** If an active raptor nest is found, no construction activities shall occur within 250 feet of the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young have left the nest or as approved by the qualified biologist. If an active non-raptor bird nest is found. An appropriate buffer zone around the nest shall be determined by the qualified biologist and remain in place until the young have fledged.

- **MM BIO -11.** To the extent practicable, removal of large trees with cavities shall occur before bat maternity colonies form (i.e., prior to March 1) or after young are volant (i.e., after August 15).
- **MM BIO -12.** If construction (including the removal of large trees) occurs during the bat non-volant season (March 1 through August 15), a qualified professional shall conduct a pre-construction survey of the BSA to locate maternity colonies and identify measures to protect colonies from disturbance. The pre-construction survey will be performed no more than 14 days prior to the implementation of construction activities (including staging and equipment access). If a maternity colony is located within or adjacent to the BSA, a disturbance-free buffer shall be established by a qualified professional to ensure the colony is adequately protected from project activities.
- **MM BIO -13.** To the extent practicable, removal of vegetation shall occur outside of the ring-tailed cat maternal denning period (May 1–June 30).
- **MM BIO -14.** If vegetation removal is to occur during the ring-tailed cat maternal denning period (May 1–June 30), a qualified biologist shall conduct a preconstruction survey of the BSA to locate maternity dens. The preconstruction survey will be performed no more than 7 days prior to the vegetation removal.
- **MM BIO -15.** If a ring-tailed cat maternity den is found, a qualified biologist (in consultation with the City and CDFW) will develop measures to protect the maternity den from disturbance.
- **MM BIO -16.** To the extent practical no removal of native trees or shrubs shall occur in valley foothill riparian habitat. Removal of native vegetation shall be limited to the minimum area necessary to facilitate construction in valley oak woodland habitat.

V. CULTURAL RESOURCES: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V. CULTURAL RESOURCES: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Archival research, consultation with the Native American community, and an intensive archaeological survey are summarized in the Archaeological Survey Report (ASR) and Historic Properties Survey Report (HPSR) prepared for the Diestelhorst to Downtown Non-Motorized Improvement Project (Stantec 2018). There is a total of three resources within the APE: two parking lots and a section of an old railroad spur consisting of two steel rails embedded in city street pavement. All three are exempt from evaluation under Attachment 4 of the Caltrans Section 106 PA. As currently proposed the project would have no impact on historical resources.
- b, d) Archival research conducted for the project’s ASR did not yield records of any documented prehistoric sites in the project area. However, the project area is located on a floodplain terrace that could suggest the potential for cultural resources. The Caltrans buried site sensitivity database revealed that the project area has low to moderate sensitivity for buried resources. While the project is not anticipated to affect cultural resources, the following standard practices were incorporated into the project design:
 - **CR-1.** If previously unidentified cultural materials are unearthed during construction, it is Caltrans’ policy that work be halted in that area until a qualified archaeologist can assess the significance of the find. Additional archaeological surveys will be needed if the proposed project undertaking limits are extended beyond the present survey APE limits.
 - **CR-2.** If human remains are discovered during project activities, all activities in the vicinity of the find will be stopped and the Shasta County Sheriff-Coroner’s Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the Native American Heritage Commission (NAHC). Treatment of the remains shall be conducted in accordance with further direction of the County Coroner or the NAHC, as appropriate.
- c) No unique geologic features, fossil-bearing strata, or paleontological sites are known to exist on the project site.

Documentation

- Archaeological Survey Report and Historic Properties Survey Report prepared by Stantec, 2018.
- Vaughan, Trudy and Dan McGann (Coyote & Fox Enterprises). Archaeological Survey Report for the Proposed Diestelhorst Bridge Replacement Project, Bridge #6C-1, Redding,

Shasta County, California. Includes Addendum 1 and 2. Prepared for CH2M Hill, Redding, CA NEIC Report #12179.

Mitigation

None required.

VI. GEOLOGY AND SOILS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publications 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a, c, d) There are no Alquist-Priolo earthquake faults designated in the Redding area of Shasta County and there are no other documented earthquake faults in the immediate vicinity that pose a significant risk of rupture, ground shaking or otherwise unstable ground conditions. The closest active fault is over 30 miles away from Redding; however, the Health and Safety

Element of the *General Plan* states that the Redding area has experienced numerous earthquake events with the strongest reported magnitude being a 3.5.

Implementation of the proposed project would not increase the potential for ground shaking to occur. Ground shaking activities such as earthquakes would have a negligible effect on the new paved pathways and associated project features. According to the *General Plan* landslides could occur in the westernmost portion of the city of Redding, however this is outside of the proposed project area and would not pose a significant hazard.

Other types of ground failure such as expansive soils and subsidence (the gradual settling or sinking of an area with little or no horizontal motion) are not considered to pose a significant hazard within the proposed project area. The Caltrans Seismic Design Criteria will be incorporated into the project design to ensure the pathways and associated project features are built to withstand any potential ground shaking that could occur in the project area.

Soil liquefaction occurs when ground shaking from an earthquake causes a sediment layer saturated with groundwater to lose strength and take on the characteristics of a fluid, thus becoming similar to quicksand. Factors determining the liquefaction potential are soil type, the level and duration of seismic ground motions, the type and consistency of soils, and the depth to groundwater. Loose sands and peat deposits, along with recent Holocene age deposits, are more susceptible to liquefaction, while older deposits of clayey silts, silty clays, and clays deposited in freshwater environments are generally stable under the influence of seismic ground shaking. The project site consists of well-drained, gravely-loam soils which have a low potential for liquefaction or ground failure to occur. The proposed project would not be expected to substantially result in adverse effects from liquefaction and key design features would ensure the pathways and associated project features are constructed to provide structure stability.

No impact is anticipated on the proposed project due to ground shaking, liquefaction, landslides, unstable soils, or expansive soils.

- b) The majority of the proposed project alignment is in city streets with proposed staging areas located immediately adjacent to previously disturbed parking areas and pullouts. The project is subject to certain erosion-control requirements and BMPs, mandated by existing City regulations which includes:
- *City of Redding Grading Ordinance*. This ordinance requires preparation of an erosion and sediment control plan for projects affecting more than one acre. The erosion and sediment control plan requires preparation and description of any BMPs that will be used during construction and post-construction, if needed.
 - *City of Redding Stormwater Quality Management and Discharge Control Ordinance*. This ordinance requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) for projects affecting greater than 1 acre. The objectives of the SWPPP are to identify the sources of sediment and other pollutants that may affect water quality associated with stormwater discharges and to describe and ensure the implementation of BMPs to reduce those sources of sediment and other pollutants in stormwater discharges.

The potential for project implementation to result in substantial soil erosion or the loss of topsoil would be less than significant.

- e) The proposed project does not involve the use of septic tanks or alternative wastewater disposal. No impact has been identified.

Documentation

- Caltrans, 2013. Seismic design criteria, version 1.7.
<http://www.dot.ca.gov/hq/esc/techpubs/manual/othermanual/other-engin-manual/seismic-design-criteria/sdc.html>.
- City of Redding. 2000-2020 General Plan. Health and Safety Element figures 4-1 (Ground Shaking Potential) and 4.2 (Liquefaction Potential)
- *City of Redding* Grading Ordinance, RMC Chapter 16.12
- City of Redding Standard Specifications, Grading Practices
- Natural Resources Conservation Service. 2018. Web soil survey. Shasta County Area, California. <http://websoilsurvey.nrcs.usda.gov/app/> cited July 25, 2018.
- State Regional Water Quality Control Board, Central Valley Region, Regulations related to Construction Activity Storm Water Permits and Storm Water Pollution Prevention Plans

Mitigation

None necessary.

VII. GREENHOUSE GAS EMISSIONS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) The United States Environmental Protection Agency (EPA) identifies the following four primary constituents that are most representative of the GHG emissions:
- *Carbon Dioxide (CO₂)*: Emitted primarily through the burning of fossil fuels. Other sources include the burning of solid waste and wood and/or wood products and cement manufacturing.

- *Methane (CH₄)*: Emissions occur during the production and transport of fuels, such as coal and natural gas. Additional emissions are generated by livestock and agricultural land uses, as well as the decomposition of solid waste.
- *Nitrous Oxide (N₂O)*: The principal emitters include agricultural and industrial land uses and fossil fuel and waste combustion.
- *Fluorinated Gases*: These can be emitted during some industrial activities. Also, many of these gases are substitutes for ozone-depleting substances, such as chlorofluorocarbons (CFCs), which have been used historically as refrigerants. Collectively, these gases are often referred to as "high global-warming potential" gases.

The primary generators of GHG emissions in the United States are electricity generation and transportation. The EPA estimates that nearly 85 percent of the nation's GHG emissions are comprised of CO₂. Most CO₂ emissions are generated by petroleum consumption associated with transportation and coal consumption, which is in turn associated with electricity generation. The remaining emissions are predominately the result of natural-gas consumption associated with a variety of uses.

Regarding the proposed project, the predominant associated GHG is CO₂ generated by motor-vehicle travel to and from the site. CARB has recommended the use of 10,000 metric tons of carbon dioxide equivalent per year (mtCO₂-e/yr) as the de minimus gas emission threshold in its Climate Change Scoping Plan (approved January 9, 2009, updated May 22, 2014). According to California Air Pollution Control Officers Association's (CAPCOA), the 10,000 mtCO₂-e/yr is equivalent to 550 dwelling units, 400,000 square feet of office use, 120,000 square feet of retail, or 70,000 square feet of supermarket use.

The proposed project emissions from construction activities would be substantially under the equivalent levels required for construction of these types of projects. Given the scope and nature of the proposed project compared to that of similar projects, emissions from the project would be significantly below the thresholds put forth by CARB, as well as the City's air-quality thresholds. Therefore, the project would not contribute significantly to GHG emissions in the air basin. Additionally, the City and State's construction standards and BMPs, including AQ-1 through -7 (listed in Section III, Air Quality, above), will be used during construction to further limit any potential contribution to negative impacts from GHG emissions. The project would have no direct or indirect impact on measurable GHGs in the Redding area.

- b) The project would not conflict with any applicable plans, policies, or regulations adopted to reduce GHG emissions. As noted in "a" above, and in Section III, the project is in conformance with the City's air quality policies and thresholds, and with state guidelines and regulations, and conservation measures and BMPs AQ-1 through AQ-7 listed in Section III Air Quality. The proposed project would have no impact on any applicable plans, policies, or regulations related to GHG emissions.

Documentation

- City of Redding General Plan, 2000

- URBEMIS (2007,v 9.2.4) Air Quality Computer Model Redding General Plan Air Quality Element, 2000
- CAPCOA website, 2010
- California Office of the Attorney General, The California Environmental Quality Act Addressing Global Warming Impacts at the Local Agency Level, updated January 6, 2010
- Shasta Air Quality Management District,
https://www.co.shasta.ca.us/index/drm_index/aq_index.aspx. Accessed July 20, 2018.

Mitigation

None necessary.

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas, or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a, b, d) The nature and scope of the proposed project (a non-motorized recreational trail) would not present a significant risk related to hazardous materials or emissions. The project area is not on any lists of properties known to contain hazardous materials. A review of known hazardous materials sites databases identified several nearby leaking underground storage tank sites and cleanup sites including the following:

- J H Baxter and Company at 1115 Court Street (within the project area): Site Under Evaluation
- PG&E Old Redding Service Center West and East Property at 1075 North Court Street (approximately 100 feet east of North Court Street): Closed Cleanup Program Site
- YMCA Shasta County Family at 1155 Court Street (approximately 200 feet east of North Court Street): Closed LUST Cleanup Site
- Caltrans Shop 02 Facility at 1000 Center Street (within project area): Closed LUST Cleanup Site
- Miller Auto Center at 1150 California Street (approximately 200 feet east of Center Street): Closed LUST Cleanup Site

Except for one site, all the above listed cases are now closed and do not pose a threat to the project in the form of hazardous material leaks or spills. The J H Baxter and Company site has been under evaluation since March 24, 1988; however, no further documentation has been updated for this site since it was screened on May 22, 1995. The proposed project would have no impact on this site.

Construction activities pose a slight risk for solvent or fuel spills or leaks. As a part of the Clean Water Act Section 402, National Pollutant Discharge Elimination System, and conservation measure BIO-1 (described in Section IV, Biological Resources), a SWPPP is required when obtaining a general construction permit. Compliance under water quality regulations and the SWPPP would require use of the following standard conservation measures

and BMPs to avoid or minimize the potential for accidental release of hazardous materials from spills or fuel leaks during project construction:

- **HAZ-1.** Hazardous materials, including fuels, oils, cement, and solvents will be stored and contained in an area protected from direct runoff and away from areas where they could enter waters of the United States.
- **HAZ-2.** Construction equipment will be inspected daily for leaks. Leaking fluids will be contained upon detection and equipment repairs will be made as soon as practicable or the leaking equipment will be moved off site.
- **HAZ-3.** Secondary containment such as drip pans or absorbent materials shall be used to catch spills or leaks when removing or changing fluids. Secondary containment will be used for storage of all hazardous materials.
- **HAZ-4.** Spill containment and clean-up materials shall be kept on site at all times for use in the event of an accidental spills.
- **HAZ-5.** Absorbent materials shall be used on small spills rather than hosing down or burying the spill. The absorbent material shall be promptly removed and properly disposed.

The potential for project construction and operation to create a hazard to the public or the environment through the accidental spill or pollutants would be less than significant.

- c) There are no existing or currently proposed schools within 0.25 mile of the project area. Two schools—University Preparatory School and Redding Cooperative Pre-School—located approximately 0.26 and 0.38 mile respectively from the project area would not be exposed to conditions that would be inconsistent with existing conditions (e.g., vehicle emissions and pollutants). There would be no impact on schools.
- e, f) The Benton Airpark is located approximately one mile southwest of the proposed project and provides commercial reliever support for the larger Redding Municipal Airport which is located further southeast in the City of Redding. However, the proposed project is outside of the airport influence area (AIA) and the limited airport use at the Benton Airpark would not result in a significant safety hazard for people residing or working in the project area. There would be no impact on air traffic.
- g) Although temporary, short duration disruptions to normal traffic operations would occur during construction, the impact would be less than significant. Temporary traffic control and lane reduction may be used during construction. Temporary signage would be used to alert motorists and non-motorized travelers to any project detour, decreased speeds, uneven pavement, etc. throughout the project alignment in accordance with the California Manual on Uniform Traffic Control Devices standards. Controlled through-traffic would be allowed to pass during construction. Operation of the completed project would have no impact on traffic operations. The project would have a less-than-significant impact on emergency response and evacuation plans during project construction.

- h) The use of construction equipment in and around vegetated areas increases the potential for wildfire ignition. Operation of the project would not increase the existing wildfire potential; however, the standard specifications require internal combustion engines to be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire. The potential for wildfire ignition would be less than significant.

Documentation

- City of Redding General Plan, Health and Safety Element, 2000
- California Environmental Protection Agency, Cortese List, 2018
- California Department of Toxic Substances Control, Envirostor, 2018
- Caltrans, California Manual on Uniform Traffic Control Devices Standards, 2017
- Shasta County Airport Land Use Commission, Comprehensive Land Use Plan Map, 1981.

Mitigation

None necessary.

IX. HYDROLOGY AND WATER QUALITY: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a new deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IX. HYDROLOGY AND WATER QUALITY: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a, f) The proposed project would largely be aligned in an existing road corridor with minor amounts of utility acquisition that would be required. The proposed project area is in the Clear Creek sewer service area that is maintained by the City’s Storm Drain Utility. Stormwater runoff in the project area would be served by the City’s sanitary sewer service. The project would not involve any discharges of waste material into ground or surface waters. Construction and operation of the project would not violate any water quality standards or waste discharge requirements established by the Central Valley Regional Water Quality Control Board (RWQCB) in its Basin Plan for the Sacramento River and San Joaquin River Basins. Water pollution BMPs were incorporated into the project and are required according to Caltrans Standard Specifications. The City’s construction standards require that all projects prepare a plan to address water pollution control. It is the City’s standard practice to incorporate required construction standards into the project design. The construction standards and specifications for the project will require that a SWPPP be prepared by the contractor prior to construction, as described in conservation measures BIO-1 (see Section IV, Biological Resources). The SWPPP will ensure that water quality standards are not substantially affected by the project through the implementation of sediment control measures and runoff prevention practices. In addition, conservation measures and BMPs BIO-2 and -3 described in Section IV, Biological Resources, and HAZ-1 through -5 included in Section VIII, Hazards and Hazardous Materials will be used

to avoid or minimize potential project-related impacts on water quality. The proposed project would have a less-than-significant impact on water quality.

- b–e.) The proposed project would use City water service for domestic and construction uses, and fire protection. The proposed project would not impact groundwater supplies. Although construction activities could temporarily alter the existing drainage patterns in the project area, these activities would not result in substantial erosion, surface runoff, flooding on or off site, or otherwise substantially degrade water quality. Minor increases in impervious surfaces resulting from the new paved pathway and improvements to the existing drainage system would not create run-off that would exceed the capacity of existing or planned stormwater drainage systems. The level of impacts on drainage patterns in the project area would be less than significant.
- g) The proposed project would not place housing within a one-hundred-year floodplain. No impact would occur.
- h-j) The project area includes work adjacent to the Sacramento River which is designated as Floodway Zone AE and Zone X (Federal Emergency Management Agency 2011). Zone AE is a floodplain designation which has mapped base flood elevations (BSE) determined while Zone X is an area that is subject to a 0.2 percent annual chance of flood hazard and one percent annual chance of flooding. Although the project would involve the placement of a new paved pathway partially within the Zone X designated area, it would sit at an elevation that is higher than the floodplain and would not increase the flood-hazard. In addition, the new pathways would be constructed to adequately pass flows associated with a 100-year storm event. The threat of a tsunami wave is not applicable to inland, central valley communities such as Redding. Seiches could potentially be generated in either Shasta or Whiskeytown Lakes during an earthquake. As identified in the Health and Safety Element of the General Plan, if a seiche over 65 feet in height were to overtop Shasta Dam, or in the event of dam failure, the proposed project area would be outside of the inundation zone. However, regional history documents that the potential for such a threat is low (City of Redding 2000). There is no documented threat of mudflows affecting the project site. No impact would occur.

Documentation

- City of Redding 2000-2020 General Plan. Health and Safety Element 2000.
- Federal Emergency Management Agency (FEMA), Floodplain regulations, FIRM Map 06089C1545G, March 17, 2011
- Central Valley RWQCB, The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region, 4th edition, Revised July 2016.

Mitigation

None necessary.

X. LAND USE AND PLANNING: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) The project does not have the potential to physically divide an established community.
- b) The project would be constructed within the existing City right of way and on City-owned property, with a possible portion occurring in a utility acquisition, depending on final design. The proposed project would not conflict with any applicable policies and regulations of the City’s General Plan and Zoning Ordinance.
- c) There are no habitat conservation or natural community conservation plans that are applicable to the project site.

Documentation

- City of Redding General Plan, Community Development Element, 2000
- City of Redding General Plan, Natural Resources Element, 2000

Mitigation

None necessary.

XI. MINERAL RESOURCES: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XI. MINERAL RESOURCES: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a, b) The project area is not identified in the General Plan as having any known mineral-resource value or as being located within any critical mineral resource overlay area. No impact would occur.

Documentation

- City of Redding General Plan, Natural Resources Element, 2000
- California Geological Survey, Aggregate Sustainability in California prepared by J. Clinkenbeard, 2012

Mitigation

None necessary.

XII. NOISE: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XII. NOISE: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a-f) The project area would be located largely within the existing City right of way and on City-owned property. Sources of ambient noise in the project area comes from vehicle traffic on area roads, including North Court Street and nearby State Route 299/Market Street, the adjacent railroad, and recreationists using the existing trail system and nearby park. The proposed project is not capacity increasing and would not generate increases in ambient noise levels. Recreational uses of the new trail would be limited to non-motorized activities, consistent with the existing trail system with which it would be connected.

During construction, the City's Grading Ordinance (RMC Chapter 16.12.120.H) limits grading-permit-authorized activities to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. No operations are allowed on Sunday. Noise generated by temporary construction activities and permanent operation of the proposed project would be similar to existing conditions. Potentially sensitive receptors such as nearby residences, businesses, and recreationists would not be subject to excessive ground-borne vibration or noise levels. No permanent or long-term noise impacts would occur because of the project. Temporary construction noise impacts would be less than significant.

Benton Airpark is located within 1 mile of the proposed project. Residents and businesses are not exposed to noise generated by airport operations because of topography, vegetation, and distance; therefore, implementation of the proposed project would have no cumulative noise impact on residents or businesses near the project area.

Documentation

- City of Redding General Plan, Noise Element, 2000
- City of Redding General Plan, Transportation Element, 2000
- City of Redding Zoning Ordinance Redding Municipal Code, Section 18.40.100
- Shasta County Airport Land Use Commission, Comprehensive Land Use Plan Map, 1981

Mitigation

None necessary.

XIII. POPULATION AND HOUSING: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a,b,c) The proposed project is intended to improve non-motorized cycling and pedestrian pathways it would not induce population growth in the City of Redding area. The proposed project is a trail improvement project and will not increase vehicle capacity. Because the proposed project would occur largely within the City’s right of way, there would be no displacement of persons or housing because of project construction.

Documentation

- City of Redding General Plan, Housing Element 2014
- City of Redding General Plan, Transportation Element

Mitigation

None necessary.

XIV. PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a-b) The proposed project would not cause substantial adverse physical impacts on government facilities or negatively affect public services. Emergency services, including fire and police, may be temporarily affected by restricted traffic flow during construction; however, access will be maintained through the project area during construction and this impact would be less than significant. Similarly, access to the nearby schools (i.e., Redding Cooperative Pre-School and the University Preparatory School), parks and other public facilities would not be substantially affected since access will be maintained through the project area during construction. Proposed contractor staging areas in the existing Sacramento River trail parking may temporarily interfere with parking near the trailhead; however, limited parking would still be available at the site and access to the trailhead will be maintained throughout construction. Once constructed the project would not interfere with emergency response and evacuation as each build alternative allows emergency personnel to lower the traffic bollards on the closed portion of Riverside Drive and use it as a two-lane road during an emergency. The proposed project would have a less-than-significant temporary impact, and no permanent impact, on public services.

Documentation

- City of Redding General Plan, Public Facilities Element, 2000

Mitigation

None necessary.

XV. RECREATION: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a,b) The proposed project includes a new recreational trail segment connecting the existing Sacramento River trailhead to downtown Redding. The direct connectivity between the existing trail and downtown that would be created by the proposed trail alignment would increase safety for both recreationists and vehicle traffic using area roads. It is anticipated that bicyclists and pedestrians would make use of the new designated trail, sidewalks, and bike lanes instead of using the existing configuration of improved and unimproved trails, and road shoulders. Because of the generally low impact of non-motorized recreation, new and existing facilities are not anticipated to deteriorate at an accelerated rate; rather, the new facilities would further disperse use and alleviate the potential for overuse of any one part of the City’s recreational facilities. The proposed project would have a less-than-significant impact on recreational facilities in Redding.

Documentation

- City of Redding General Plan, Recreation Element, 2000
- City of Redding General Plan, Public Facilities Element, 2000

Mitigation

None necessary.

XVI. TRANSPORTATION/TRAFFIC: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a, b) The project proposes non-motorized improvements to achieve safer and more efficient connectivity for pedestrians and cyclists. The proposed improvements include sidewalks, an enhanced pedestrian crossing, bicycle paths, and a cycle track. One particularly constrained area is the western portion of Riverside Drive between Center Street and North Court Street. This segment does not have any bicycle or pedestrian facilities, the two-lane road narrows to 22 feet when crossing under the Union Pacific Railroad trestle, and sight distance is limited due to the vertical and horizontal roadway alignment. The majority of vehicle traffic on this segment is cut-through traffic with other origin-destination travel route options. With Riverside Drive closed, the cut-through traffic would be re-routed to nearby streets in the project vicinity. Traffic studies were conducted to quantify the short-term and cumulative vehicular impacts

associated with a one-way or full closure of Riverside Drive. City prepared studies analyzed the short-term effects of Alternative 2, and a Traffic Operations Report (TOR) was prepared to assess the long term or cumulative effects of each alternative.

The following scenarios were analyzed:

- Existing Conditions: No Project (Baseline) – Under this scenario two-way vehicle traffic is maintained.
- Existing Conditions + Project (Baseline + Project Alternative 2)
- Year 2040 Conditions: No Project (Reasonably Foreseeable Future) – Under this scenario, two-way vehicle traffic is maintained.
- Year 2040: One-Way Closure of Riverside Drive (Alternative 1) – Under this scenario, one direction of vehicle traffic is eliminated on Riverside Drive from Center Street to North Court Street.
- Year 2040: Riverside Drive Closed to Vehicle Traffic (Alternative 2 – Preferred Alternative) – Under this scenario, Riverside Drive would be closed to through vehicle traffic from Center Street to North Court Street.

The traffic studies identified traffic volumes, study intersections, and study segments for the project area and vicinity. Data and analysis for the existing conditions (Baseline), Alternative 1, and Alternative 2 are presented in a side by side comparison format below. The 2040 No Project scenario was presented for the cumulative analysis as it represents the reasonably foreseeable future condition with no project; however, the existing conditions were established as the baseline for the direct effects CEQA analysis.

Traffic Volumes

Table 1 presents the average daily traffic (ADT) for the study segments. The current ADT on Riverside Drive is 3,647 vehicles per day. With implementation of Alternative 1, approximately 38 percent of the traffic, or 1,383 vehicles, would be re-routed to other roadway segments. Under the same scenario, 62 percent of the traffic, or 2,264 vehicles, would continue one-way travel on Riverside Drive. With implementation of Alternative 2, 100 percent of the traffic, or 3,647 vehicles, would be re-routed to other roadway segments.

Table 1 Average Daily Traffic (ADT) Comparison									
		Baseline		Baseline + Project		Alternative 1		Alternative 2	
Roadway Segment	Location	Existing ADT		2020 ADT with Project		2040 One-Way		2040 Closed	
		NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Market St	Eureka Way to Trinity St	15,838	15,074	14,339	13,798	19,481	17,035	17,776	17,035
Market St	Trinity St to Riverside Dr	15,720	14,916	14,281	13,640	19,336	16,840	17,631	16,840

**Table 1
Average Daily Traffic (ADT) Comparison**

		Baseline		Baseline + Project		Alternative 1		Alternative 2	
Roadway Segment	Location	Existing ADT		2020 ADT with Project		2040 One-Way		2040 Closed	
		NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Market St	Riverside Dr to Quartz Hill Dr	14,913	14,251	15,779	15,012	18,343	18,533	19,480	18,533
Riverside Dr	Market St to California St	2,041	2,310	0	0	0	2,841	0	0
Riverside Dr	California St to Benton Dr	1,806	1,841	0	0	0	2,264	0	0
Benton Dr	Riverside Dr to Rio Dr	3,903	3,825	2,968	2,998	4,801	3,701	3,664	3,701
Benton Dr	Rio Dr to Quartz Hill Dr	3,589	3,511	2,655	2,684	4,414	3,314	3,278	3,314
Quartz Hill Dr	Market St to Delta St	1,248	1,242	2,056	2,157	2,539	1,528	2,539	2,664
Quartz Hill Dr	Delta St to Benton Dr	153	153	965	1,073	1,192	188	1,192	1,325
Eureka Way	Market St to California St	13,715	11,122	14,885	12,462	18,376	13,680	18,376	15,385
Eureka Way	California St to Court St	13,704	11,347	14,873	12,886	18,362	13,957	18,362	15,662
Court St	Eureka Way to 11th St	2,034	2,235	3,408	3,447	2,502	4,255	4,207	4,255
Court St	11th St to Riverside Dr	3,854	4,084	5,520	5,289	4,740	6,530	6,445	6,530

Level of Service and Delay

Based on the City of Redding's goal for arterial roadways, the Level of Service (LOS) threshold for all intersections will be LOS D. Following is a brief description of each LOS rating:

- Level of Service A: Very slight delay. Progression is very favorable, with most vehicles arriving during the green phase and not stopping at all.
- Level of Service B: Good progression and/or short cycle lengths. More vehicles stop than for LOS A, causing higher levels of average delay.
- Level of Service C: Higher delays resulting from fair progression and/or longer cycle lengths.
- Level of Service D: The influence of congestion becomes more noticeable. Many vehicles stop, and the proportion of vehicles not stopping declines.
- Level of Service E: Generally considered to be the limit of acceptable delay.
- Level of Service F: Generally considered to be unacceptable to most drivers.

Short-Term (Existing + Project) Analysis

Traffic analysis identified that the project would have a less-than-significant impact in the short-term as all study intersections remain at a LOS D or better with implementation of either Alternative 1 or Alternative 2.

Cumulative Analysis

To compare potential cumulative impacts that may result from implementation of alternatives 1 or 2, the LOS and delay are shown in tables 2 and 3 below. Table 2 represents the Year 2040 A.M. Peak Hour data, while Table 3 represents the Year 2040 P.M. Peak Hour data. The LOS data reflects conditions based on a "peak hour," corresponding to the morning or afternoon commute. Intersections and roadways may be impacted for short periods of time during these peak hours without affecting the overall LOS rating for the intersection.

Table 2 Intersection AM Peak Hour Delay and Level of Service Comparison										
			Baseline		Foreseeable Future		Alternative 1		Alternative 2	
Intersection	Control Type 1,2	Target LOS	Existing Condition		2040 No Project		2040 One-Way		2040 Closed	
			Delay	LOS	Delay LOS	LOS	Delay LOS	LOS	Delay LOS	LOS
Court St/ Eureka Way	Signal	D	42.9	D	50.5	D	58.6	E	62.0	E
Court St/ 11th St	Signal	D	15.1	B	17.1	B	16.8	B	16.7	B
Court St/Benton Dr/Riverside Dr	TWSC	D	18.7	C	23.4	C	11.4	B	0.0	A
Benton Dr/ Quartz Hill Rd	Signal	D	36.4	D	45.2	D	47.2	D	46.6	D
Market St/ Quartz Hill Rd	Signal	D	18.9	B	22.2	C	23.2	C	24.0	C
Market St/ Riverside Dr	Signal	D	9.7	A	10.3	B	8.2	A	6.1	A
Market St/ Trinity Dr	Signal	D	21.3	C	23.8	C	23.9	C	23.8	C
Market St/ Eureka Way	Signal	D	32.2	C	34.0	C	33.1	C	33.7	C

Notes:
 1. TWSC = Two Way Stop Control
 2. LOS = Delay based on worst minor street approach for TWSC intersections, average of all approaches for signal

Table 3 Intersection PM Peak Hour Delay and Level of Service Comparison										
			Baseline		Foreseeable Future		Alternative 1		Alternative 2	
Intersection	Control Type ^{1,2}	Target LOS	Existing		2040 No Project		2040 One-Way		2040 Closed	
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Court St/ Eureka Way	Signal	D	42.9	D	84.8	F	91.5	F	94.4	F
Court St/ 11th St	Signal	D	15.1	B	14.2	B	14.0	B	14.4	B
Court St/Benton Dr/Riverside Dr	TWSC	D	18.7	C	30.4	D	21.5	C	0.0	A
Benton Dr/ Quartz Hill Rd	Signal	D	36.4	D	49.5	D	49.7	D	52.9	D
Market St/ Quartz Hill Rd	Signal	D	18.9	B	24.8	C	25.2	C	28.2	C
Market St/ Riverside Dr	Signal	D	9.7	A	9.8	A	7.8	A	6.2	A
Market St/ Trinity Dr	Signal	D	21.3	C	24.7	C	24.8	C	24.7	C
Market St/ Eureka Way	Signal	D	32.2	C	33.2	C	32.4	C	32.6	C

Notes:
1. TWSC = Two Way Stop Control
2. LOS = Delay based on worst minor street approach for TWSC intersections, average of all approaches for Signal

The A.M. peak hour delay and LOS do not vary considerably at most intersections when comparing the three Year 2040 scenarios. When either project alternative is compared to the Year 2040 No Project scenario, the largest change occurs at the Court Street and Eureka Way intersection where the LOS decreases from D to E, which is below the target LOS threshold. The A.M. peak hour delay at this intersection also increases by 8 seconds for Alternative 1 and 12 seconds for Alternative 2.

When the project alternatives are compared to the Year 2040 No Project scenario, the P.M. peak hour LOS remains the same or improves at most study intersections; however, the Court Street and Eureka Way intersection reflects a LOS "F" without project implementation. With implementation of either project alternative, the Court Street and Eureka Way intersection remains at a LOS F, which is below the LOS threshold. The increase in delay at this intersection ranges from 6.7 seconds to 9.6 seconds, which exceeds the delay threshold for an intersection having an unacceptable LOS without project traffic.

Travel Time

To further analyze the potential impacts of a one-way or full closure on Riverside Drive, study routes were identified and are shown on Figure 3 (Attachment A). Route travel times were analyzed for both the Year 2040 A.M. and P.M. peak hours.

Alternative 1 would not increase the Year 2040 A.M. peak travel time on Route 2 northbound, but Alternative 2 would increase the travel time by 2 seconds. Travel time for Route 2 southbound has a decreased travel time of 9 seconds for Alternative 1, and a decreased travel time of 14 seconds for Alternative 2. Route 3 would incur the greatest increase with an additional travel time of 10 to 37 seconds for Alternative 1, and an additional travel time of 15 to 37 seconds for Alternative 2.

Implementation of either build alternative would increase the Year 2040 P.M. peak travel time on Route 2 by up to 3 seconds in the northbound direction. Route 2 southbound would have a decreased travel time of 14 seconds for Alternative 1 and a decreased travel time of 18 seconds for Alternative 2. Route 3 would incur the greatest increase with an additional travel time of 15 to 20 seconds for Alternative 1 and an additional travel time of 19 to 20 seconds for Alternative 2.

Thresholds of Significance

The City of Redding Traffic Impact Analysis Guidance identifies the following thresholds of significance for signalized intersections:

- The project causes an acceptable LOS to decline to an unacceptable LOS, or
- The project increases the average delay by more than 5 seconds per vehicle at an intersection having an unacceptable LOS without project traffic.

Both Alternative 1 and Alternative 2 (preferred) would result in cumulative circulation impacts requiring a fair share contribution towards improvements that will be needed in the future. To address the project's need to mitigate its share of the cumulative impacts on the City traffic network, the City will be required to pay impact fees to the Citywide Transportation Development Impact Fee (TIF). The TIF is intended to generate funds for communitywide traffic improvements, and the list of projects to be implemented with these funds is updated on an ongoing basis. The priority of a project to be funded is also updated on an ongoing basis through the City's Capital Improvement Plan (CIP). The CIP program covers a five-year period, identifies those projects that are most needed, and provides a schedule for funding.

The project would have a cumulative impact on the Court Street and Eureka Way intersection by Year 2040, as the LOS would fall below the threshold of LOS D and the average delay would increase by more than 5 seconds per vehicle at an intersection having an unacceptable LOS without project traffic. The intersection would require signal timing adjustments, turn lane provisions, and restriping. The project's fair share of improvements on this intersection is 24.5 percent. The payment of TIF fees would mitigate the project's incremental cumulative effect on

the Court Street and Eureka Way intersection. Cumulative traffic impacts would be less than significant with mitigation incorporated.

During construction, partial closures may be required on North Court Street, Riverside Drive, Center Street, Division Street, and Trinity Street. Construction is anticipated to last approximately one construction season. Traffic controls, such as a temporary signals or signage, would be used to maintain traffic flow through the project area. Staging would occur within the existing parking facilities at the Sacramento River Trail access in the northern portion of the project area. Temporary construction traffic and effects on traffic through the project area during construction would be minor and are not expected to cause substantial changes in levels of service (LOS). Once construction is complete the proposed project would improve conditions for pedestrians and bicyclists. The project is anticipated to reduce conflicts between bicyclists, pedestrians, and vehicles. Impacts on traffic congestion would be less than significant.

- c) The Benton Airpark is located approximately 1 mile southwest of the proposed project. The proposed project would include corridor lighting and enhanced crossing with rapid flashing beacons at North Court Street, similar to existing City infrastructure. According to the Federal Aviation Administration (FAA) guidance regarding land use compatibility near airports, high mast lights and stadium lights can be a visible distraction to pilots approaching an airport facility (FAA ND). The proposed project does not include high mast lights or stadium lights and would be consistent with the existing lighting within the area. Further, any lighting included will comply with the City's Zoning Ordinance light standards that includes appropriate shielding. The project would not result in a change in air traffic patterns or result in a substantial safety risk and there would be no impact on air traffic.
- d) The proposed project was designed to provide safer and more efficient travel for non-motorized traffic from the connection with the Sacramento River trail to downtown Redding. Specific project features associated with improved safety, such as the addition of corridor lighting, enhanced roadway crossings, improved sidewalks and bike lanes, and improved intersection facilities would be included as part of the proposed project. The project would not result in the creation of sharp curves, dangerous intersections, or incompatible uses, but, rather, it would improve the existing conditions. No impact would occur.
- e) Project construction would not significantly interfere with emergency access. Construction-related activities would be short-term and temporary in nature with possible partial closures of Riverside Drive from Court Street to Center Street, depending on final project design. Stop signs during non-construction times and flagging during construction are anticipated and emergency vehicles would be allowed to pass through the project area in an expedited manner. Once constructed, the project would not interfere with emergency response and evacuation as each build alternative allows emergency personnel to lower the traffic bollards on the closed portion of Riverside Drive and use it as a two lane road during an emergency. Impacts would be less than significant.
- f) The proposed improvement project would improve non-motorized transportation. The addition of the paved pathways and creation of sidewalks would improve public safety in the project area and enhance pedestrian and bicycle access.

Documentation

- City of Redding General Plan, Transportation Element, 2000
- City of Redding Traffic Impact Analysis Guidelines, 2009
- City of Redding Parks, Trails, and Open Space Master Plan, 2018
- Federal Aviation Administration, Land Use Compatibility and Airports, ND
- Omni Means/GHD Technical Memorandum No. 2, June 2018

Mitigation

- MM TRA -1. The project’s potential cumulative contribution to traffic impacts will be mitigated by payment of the City’s traffic impact fee in accordance with Chapter 16.20 of the Redding Municipal Code, which is collected prior to the initiation of construction.

XVII. TRIBAL CULTURAL RESOURCES: Would the project: cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a, b) In accordance with Assembly Bill 52 (AB 52), the City, under the purview of Caltrans District 2, consulted with the NAHC and local Native American groups and individuals pursuant to Section 106 of the National Historic Preservation Act and Section 21080.3 of CEQA. This consultation included contacting the local Native American individuals identified by the NAHC via letters sent on October 27, 2017, and follow-up phone calls and/or emails. Additionally, the NAHC conducted a review of its Sacred Lands database for culturally significant properties and responded by fax on July 27, 2017, indicating that the Sacred Lands File contained a positive result for significant properties that could be affected by the proposed project and for more information, contact the Redding Rancheria. The location and nature of the sacred site has not been determined as there was no response from the Redding Rancheria upon further

consultation. No further tribal cultural resources were identified in the project area and the proposed project construction would therefore, not cause a substantial adverse change in the significance of any known tribal cultural resources.

Documentation

- Archaeological Survey Report and Historic Properties Survey Report prepared by Stantec Consulting Service, Inc., 2018

Mitigation

None required.

XVIII. UTILITIES AND SERVICE SYSTEMS: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project which serves or may serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with Federal, State, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) Construction of the proposed project would not generate wastewater in quantities that would exceed treatment requirements of the applicable RWQCB.
- b) The proposed project is a public recreational trail improvements project. Construction of the proposed project would not generate the need for the construction of new water or wastewater-treatment facilities.
- c) Project-related stormwater-management components consist of improvements to the storm drain along Center Street as well as curb and gutter improvements throughout the new pathways associated with the proposed project. These improvements would flow into the existing stormwater system within the area. This would not substantially alter stormwater facilities in the project area. Minor increases in impervious surfaces due to the construction of the new paved pathway would not substantially affect stormwater facilities and impacts would be considered less than significant.
- d) Construction and operation of the proposed project would not require the use of potable water. Water required for construction use would be available from the City's existing water resources. The proposed project would have no impact on the City's ability to maintain adequate pressure and flows for fire suppression.
- e) Construction of the proposed project would not result in the need for new water or wastewater-treatment facilities.
- f,g) The project construction activities would generate a minor amount of debris requiring disposal at a suitable facility, such as the City's West Central Landfill, which has sufficient permitted capacity to accommodate the project (Calrecycle 2018). Standard construction specifications would require recycling of some materials such as concrete to reduce landfill waste. Hazardous materials would be disposed of at an approved landfill. Through construction specifications the City will ensure that the project complies with federal, state, and local statutes and regulations pertaining to recycling and disposal of solid waste.

Documentation

- City of Redding General Plan, Public Facilities Elements, 2000
- Calrecycle Facility Operations, West Central Landfill, 2018

Mitigation

None necessary.

XVIV. MANDATORY FINDINGS OF SIGNIFICANCE: Would the project:	<i>Potentially Significant Impact</i>	<i>Less-Than-Significant with Mitigation Incorporated</i>	<i>Less-Than-Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a 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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have potential environmental effects which may cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

- a) The proposed project would have minimal potential to degrade the quality of the environment, affect wildlife populations or their habitats, or reduce the number or restrict the range of rare or endangered plant and animal species. Although special-status wildlife species, including VELB, may be impacted by implementation of the proposed project, standard conservation measures and BMPs, as well as mitigation measures, will be used to avoid adverse impacts on these species. Implementation of the proposed project would not eliminate examples of history or prehistory.
- b) As described in Section III, the proposed project could temporarily contribute to region-wide cumulative air quality impacts. However, these impacts would be considered less than significant and under policy of the City’s General Plan, application of standard BMPs would eliminate the potential for air quality impacts during project implementation. Upon project completion the project has the potential to reduce air quality impacts by providing safe and efficient routes for non-motorized transportation. The project’s potential cumulative traffic impacts would be less than significant with mitigation incorporated.
- c) As discussed in this document, the proposed project does not include any activities that cannot be mitigated to a less-than-significant level or that could otherwise cause substantial adverse impacts on human beings, either directly or indirectly.

Documentation

See all sections above.

Mitigation

- **MM BIO-1.** The construction limits shall be clearly identified prior to construction and all areas containing elderberry shrubs (*Sambucus nigra*) to be avoided during construction shall be fenced or flagged off.
- **MM-2 BIO.** For elderberry shrubs occurring within or immediately adjacent to work locations, 20-foot avoidance buffers shall be established around the driplines of the shrubs to help protect the shrubs and their root zones during project activities. The avoidance buffers shall be maintained for the duration of work activities in the area.
- **MM BIO -3.** To the extent feasible, all activities that occur within 165 feet of an elderberry shrub, shall be conducted outside of the flight season of VELB (March-July).
- **MM BIO -4.** If trimming of elderberry shrubs is required, it shall take place between November and February and will avoid the removal of any branches or stems measuring 1 inch or greater in diameter.
- **MM BIO -5.** Removal of vegetation within the dripline of an elderberry shrub shall be limited to August through February when adults are not active. Removal activities shall avoid damaging the elderberry shrub.
- **MM BIO -6.** The City proposes to transplant three elderberry stems, greater than 1-inch that require removal, to a USFWS approved location. In addition, the City shall also purchase one credit as mitigation for the impacted stems. The following transplanting guidelines are recommended to minimize the chance of adverse effects of VELB during transplanting.
 - Exit-hole surveys shall be completed immediately before transplanting. The number of exit holes found, GPS location of the plant to be relocated, and the GPS location of where the plant is transplanted shall be reported to the Service and to the CNDDDB.
 - Elderberry shrubs shall be transplanted when the shrubs are dormant (November through the first two weeks in February) and after they have lost their leaves. Transplanting shall follow the most current version of the ANSI A300 (Part 6) guidelines for transplanting.
- **MM BIO -7.** If western pond turtle or foothill yellow-legged frogs are encountered in the BSA during construction and could be harmed by construction activities, work will stop in the area and the City will notify CDFW. Upon authorization from CDFW, a qualified biologist may relocate the individual(s) the shortest distance possible to a location containing habitat outside of the work area.
- **MM BIO -8.** If a western pond turtle nest is discovered during construction activities, a qualified biologist shall flag the site and determine if construction activities can avoid affecting the nest. If the nest cannot be avoided, it shall be excavated and relocated to a

suitable location outside of the construction impact zone by a qualified biologist in coordination with CDFW. The City shall inform Caltrans when such an activity occurs.

- **MM BIO -9.** If vegetation removal or construction activities will occur during the nesting season for birds (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey 7 days before construction activities begin.
- **MM BIO -10.** If an active raptor nest is found, no construction activities shall occur within 250 feet of the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young have left the nest or as approved by the qualified biologist. If an active non-raptor bird nest is found. An appropriate buffer zone around the nest shall be determined by the qualified biologist and remain in place until the young have fledged.
- **MM BIO -11.** To the extent practicable, removal of large trees with cavities shall occur before bat maternity colonies form (i.e., prior to March 1) or after young are volant (i.e., after August 15).
- **MM BIO -12.** If construction (including the removal of large trees) occurs during the bat non-volant season (March 1 through August 15), a qualified biologist shall conduct a preconstruction survey of the BSA to locate maternity colonies and identify measures to protect colonies from disturbance. The pre-construction survey will be performed no more than 14 days prior to the implementation of construction activities (including staging and equipment access). If a maternity colony is located within or adjacent to the BSA, a disturbance-free buffer shall be established by a qualified biologist to ensure the colony is adequately protected from project activities.
- **MM BIO -13.** To the extent practicable, removal of vegetation shall occur outside of the ring-tailed cat maternal denning period (May 1–June 30).
- **MM BIO -14.** If vegetation removal is to occur during the ring-tailed cat maternal denning period (May 1–June 30), a qualified biologist shall conduct a preconstruction survey of the BSA to locate maternity dens. The preconstruction survey will be performed no more than 7 days prior to the vegetation removal.
- **MM BIO -15.** If a ring-tailed cat maternity den is found, a qualified biologist (in consultation with the City and CDFW) will develop measures to protect the maternity den from disturbance.
- **MM BIO -16.** To the extent practical no removal of native trees or shrubs shall occur in valley foothill riparian habitat. Removal of native vegetation shall be limited to the minimum area necessary to facilitate construction in valley oak woodland habitat.
- **MM TRA-1.** The project’s potential cumulative contribution to traffic impacts citywide will be mitigated by payment of the City’s traffic impact fee in accordance with Chapter 16.20 of the Redding Municipal Code, which is collected prior to the initiation of construction.

ATTACHMENT C

Mitigation Monitoring and Environmental Commitment Program

MITIGATION MONITORING AND ENVIRONMENTAL COMMITMENT PROGRAM

DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT (STATE CLEARINGHOUSE NO. 2018112024)

MITIGATION MONITORING PROGRAM CONTENTS

This document is the Mitigation Monitoring and Environmental Commitment Program (MMP/ECP) for the Diestelhorst to Downtown Non-Motorized Improvement Project (project). The MMP/ECP includes a brief discussion of the legal basis for, and the purpose of, the program, discussion, and direction regarding complaints about noncompliance, a key to understanding the monitoring matrix, and the monitoring matrix itself.

LEGAL BASIS OF AND PURPOSE FOR THE MITIGATION MONITORING PROGRAM

California Public Resources Code Section 21081.6 requires public agencies to adopt mitigation monitoring or reporting programs whenever certifying an environmental impact report (EIR) or a mitigated negative declaration (MND). This requirement facilitates implementation of all mitigation measures adopted through the California Environmental Quality Act (CEQA) process.

The MMP contained herein is intended to satisfy the requirements of CEQA as they relate to the Initial Study/Mitigated Negative Declaration prepared for the project. It is intended to be used by City of Redding (City) staff, participating agencies, project contractors, and mitigation monitoring personnel during implementation of the project.

- Mitigation is defined by CEQA Guidelines Section 15370 as a measure that does any of the following:
- Avoids impacts altogether by not taking a certain action or parts of an action.
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifies impacts by repairing, rehabilitating, or restoring the impacted environment.
- Reduces or eliminates impacts over time by preservation and maintenance operations during the life of the project.
- Compensates for impacts by replacing or providing substitute resources or environments.

The intent of the MMP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMP will provide for monitoring of construction activities as necessary, on-site identification and resolution of environmental problems, and proper reporting to City staff.

In addition to meeting the CEQA MMP requirements, this document incorporates environmental commitments, standard practices, conservation measures, and best management practices (BMPs). The environmental commitments may be part of the project design, standard contract specifications, City of Redding requirements, or conservation measures. These commitments are part of the project, but do not constitute mitigation under CEQA as they have not been incorporated to reduce a potentially significant impact.

MITIGATION MONITORING/ENVIRONMENTAL COMMITMENT TABLE

The MMP/ECP Table identifies the mitigation measures and commitments proposed for the project. The tables have the following columns:

- **Mitigation Measure:** Lists the mitigation measures identified within the Initial Study for a specific potentially significant impact, along with the number for each measure as enumerated in the Initial Study.
- **Environmental Commitment:** Lists the commitments identified within the project that are not related to a potentially significant CEQA impact, but further ensure environmental resource protection.
- **Timing:** Identifies at what point in time, review process, or phase the mitigation measure will be completed.
- **Agency/Department Consultation:** References the City department or any other public agency with which coordination is required to satisfy the identified mitigation measure.
- **Verification:** Spaces to be initialed and dated by the individual designated to verify adherence to a specific mitigation measures.

NONCOMPLIANCE COMPLAINTS

Any person or agency may file a complaint asserting noncompliance with the mitigation measures and commitments associated with the project. The complaint shall be directed to the City in written form, providing specific information on the asserted violation. The City shall investigate and determine the validity of the complaint. If noncompliance with a mitigation measure has occurred, the City shall take appropriate action to remedy any violation. The complainant shall receive written confirmation indicating the results of the investigation or the final action corresponding to the particular noncompliance issue.

**MITIGATION MONITORING AND ENVIRONMENTAL COMMITMENT TABLE
FOR THE DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT
MITIGATION MONITORING PROGRAM
(STATE CLEARINGHOUSE NO. 2018112024)**

ENVIRONMENTAL COMMITMENTS

The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:

Best Management Practices (BMPs)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
Air Quality (AQ)			
AQ-1. Nontoxic soil stabilizers shall be applied according to manufacturer’s specification to all inactive construction areas.	Construction	Construction Management	
AQ-2. All grading operations shall be suspended when winds (as instantaneous gusts) exceed 20 miles per hour.	Construction	Construction Management	
AQ-3. Water all stockpiles, access roads, and disturbed or exposed areas, as necessary, to prevent airborne dust.	Construction	Construction Management	
AQ-4. Water inactive construction sites at least twice daily, or as necessary, to prevent erosion.	Construction	Construction Management	
AQ-5. Pursuant to the California Vehicle Code (Section 23114(e)(4)) (California Legislative Information 2016), all trucks hauling soil and other loose material to and from the construction site shall be covered or shall maintain at least 6 inches of freeboard (i.e., minimum vertical distance between top of load and the trailer).	Construction	Construction Management	
AQ-6. All public roadways used by the project contractor shall be maintained free from dust, dirt, and debris caused by construction activities. Streets shall be swept at the end of the day if visible soil materials are carried onto adjacent public paved roads.	Construction	Construction Management	

Best Management Practices (BMPs)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
Biological Resources (BIO)			
<p>BIO-1. A Stormwater Pollution Prevention Plan (SWPPP), as required by the <i>City of Redding Stormwater Quality Management and Discharge Control Ordinance</i>, will be prepared to address BMPs that will be used to prevent erosion and sediment loss within the project site. BMPs such as silt fence, mulching and seeding, and straw wattles will be placed where needed to prevent sediment from leaving the site during and after construction.</p>	Preconstruction/ Construction/ Postconstruction	City/ Construction Management	
<p>BIO-2. High visibility fencing, flagging, or markers will be installed along the edges of the work zone near waters of the United States outside the construction area. All work and stockpiling of materials will be confined to the project disturbance area.</p>	Preconstruction/ Construction	City/ Construction Management	
<p>BIO-3. Appropriate sediment control measures (e.g., silt fences, straw wattles) shall be in place prior to the onset of construction activities within waters of the United States and in project areas where there is a potential for surface runoff to drain into waters of the United States and as required by the SWPPP. Sediment control measures shall be monitored and maintained until construction activities have ceased. Temporary stockpiling of excavated or imported material shall be placed as far away from waters of the United States as practicable. Excess soil shall be used on site or disposed of at a regional landfill or other appropriate facility. Stockpiles that are to remain on the site through the wet season shall be protected to prevent erosion (e.g., silt fences, straw bales) as required in the SWPPP.</p>	Preconstruction/ Construction	City/ Construction Management	
Cultural Resources (CR)			
<p>CR-1. If previously unidentified cultural materials are unearthed during construction, it is Caltrans' policy that work be halted in that area until a qualified archaeologist can assess the significance of the find. Additional archaeological surveys will be needed if the proposed project undertaking limits are extended beyond the present survey APE limits.</p>	Construction	Caltrans/ City/ Construction Management	
<p>CR-2. If human remains are discovered during project activities, all activities near the find will be stopped and the Shasta County Sheriff-Coroner's Office shall be notified. If the coroner determines that the remains may be those of a Native American, the coroner will contact the Native American Heritage Commission (NAHC). Treatment of the remains shall be conducted in accordance with further direction of the County Coroner or the NAHC, as appropriate.</p>	Construction	City/ NAHC/ County Coroner	

Best Management Practices (BMPs)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
HAZARDS AND HAZARDOUS MATERIALS (HAZ)			
HAZ-1. Hazardous materials, including fuels, oils, cement, and solvents will be stored and contained in an area protected from direct runoff and away from areas where they could enter waters of the United States.	Construction	City/ Construction Management	
HAZ-2. Construction equipment will be inspected daily for leaks. Leaking fluids will be contained upon detection and equipment repairs will be made as soon as practicable or the leaking equipment will be moved off site.	Construction	City/ Construction Management	
HAZ-3. Secondary containment such as drip pans or absorbent materials shall be used to catch spills or leaks when removing or changing fluids. Secondary containment will be used for storage of all hazardous materials.	Construction	City/ Construction Management	
HAZ-4. Spill containment and clean-up materials shall be kept on site at all times for use in the event of an accidental spills.	Construction	City/ Construction Management	
HAZ-5. Absorbent materials shall be used on small spills rather than hosing down or burying the spill. The absorbent material shall be promptly removed and properly disposed.	Construction	City/ Construction Management	

CEQA MITIGATION MEASURES

Resource-specific mitigation measures will be used during project implementation include:

Mitigation Measure (MM)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
BIOLOGICAL RESOURCES (BIO)			
MM BIO-1. The construction limits shall be clearly identified prior to construction and all areas containing elderberry shrubs (<i>Sambucus nigra</i>) to be avoided during construction shall be fenced or flagged off.	Preconstruction/ Construction	City/ Construction Management	
MM BIO -2. For elderberry shrubs occurring within or immediately adjacent to work locations, 20-foot avoidance buffers shall be established around the driplines of the shrubs to help protect the shrubs and their root zones during project activities. The avoidance buffers shall be maintained for the duration of work activities in the area.	Preconstruction/ Construction	City/ Construction Management	
MM BIO -3. To the extent feasible, all activities that occur within 165 feet of an elderberry shrub, shall be conducted outside of the flight season of VELB (March-July).	Preconstruction/ Construction	City/ Construction Management	
MM BIO -4. If trimming of elderberry shrubs is required, it shall take place between November and February and will avoid the removal of any branches or stems measuring 1 inch or greater in diameter.	Preconstruction/ Construction	City/ Construction Management	
MM BIO -5. Removal of vegetation within the dripline of an elderberry shrub shall be limited to August through February when adults are not active. Removal activities shall avoid damaging the elderberry shrub.	Preconstruction/ Construction	City/ Construction Management	

Mitigation Measure (MM)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
<p>MM BIO -6. The City proposes to transplant three elderberry stems, greater than 1-inch that require removal, to a USFWS approved location. In addition, the City shall also purchase one credit as mitigation for the impacted stems. The following transplanting guidelines are recommended to minimize the chance of adverse effects of VELB during transplanting:</p> <ul style="list-style-type: none"> – Exit-hole surveys shall be completed immediately before transplanting. The number of exit holes found, GPS location of the plant to be relocated, and the GPS location of where the plant is transplanted shall be reported to the Service and to the CNDDDB. – Elderberry shrubs shall be transplanted when the shrubs are dormant (November through the first two weeks in February) and after they have lost their leaves. Transplanting shall follow the most current version of the ANSI A300 (Part 6) guidelines for transplanting. 	Preconstruction/ Construction	USFWS/City/ Construction Management	
<p>MM BIO -7. If western pond turtle or foothill yellow-legged frogs are encountered in the BSA during construction and could be harmed by construction activities, work will stop in the area and the City will notify CDFW. Upon authorization from CDFW, a qualified biologist may relocate the individual(s) the shortest distance possible to a location containing habitat outside of the work area.</p>	Preconstruction/ Construction	CDFW/City/ Construction Management	
<p>MM BIO -8. If a western pond turtle nest is discovered during construction activities, a qualified biologist shall flag the site and determine if construction activities can avoid affecting the nest. If the nest cannot be avoided, it shall be excavated and relocated to a suitable location outside of the construction impact zone by a qualified biologist in coordination with CDFW. The City shall inform Caltrans when such an activity occurs.</p>	Preconstruction/ Construction	CDFW/City/ Construction Management	
<p>MM BIO -9. If vegetation removal or construction activities will occur during the nesting season for birds (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey 7 days before construction activities begin. If nesting birds are found, CDFW will be notified and consulted. An appropriate buffer, as determined by CDFW and the qualified biologist, will be placed around the nest until the young have fledged.</p>	Preconstruction/ Construction	City/ Construction Management	
<p>MM BIO -10. If an active raptor nest is found, no construction activities shall occur within 250 feet of the nest unless a smaller buffer zone is approved by CDFW. Construction may resume once the young have left the nest or as approved by the qualified biologist. If an active non-raptor bird nest is found. An appropriate buffer zone around the nest shall be determined by the qualified biologist and remain in place until the young have fledged.</p>	Preconstruction/ Construction	CDFW/City/ Construction Management	

Mitigation Measure (MM)	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date and Initials)
MM BIO -11. To the extent practicable, removal of large trees with cavities shall occur before bat maternity colonies form (i.e., prior to March 1) or after young are volant (i.e., after August 15).	Preconstruction/ Construction	City/ Construction Management	
MM BIO -12. If construction (including the removal of large trees) occurs during the bat non-volant season (March 1 through August 15), a qualified professional shall conduct a pre-construction survey of the BSA to locate maternity colonies and identify measures to protect colonies from disturbance. The pre-construction survey will be performed no more than 14 days prior to the implementation of construction activities (including staging and equipment access). If a maternity colony is located within or adjacent to the BSA, a disturbance-free buffer shall be established by a qualified professional to ensure the colony is adequately protected from project activities.	Preconstruction/ Construction	City/ Construction Management	
MM BIO -13. To the extent practicable, removal of vegetation shall occur outside of the ring-tailed cat maternal denning period (May 1–June 30).	Preconstruction/ Construction	City/ Construction Management	
MM BIO -14. If vegetation removal is to occur during the ring-tailed cat maternal denning period (May 1–June 30), a qualified biologist shall conduct a preconstruction survey of the BSA to locate maternity dens. The preconstruction survey will be performed no more than 7 days prior to the vegetation removal.	Preconstruction/ Construction	City/ Construction Management	
MM BIO -15. If a ring-tailed cat maternity den is found, a qualified biologist (in consultation with the City and CDFW) will develop measures to protect the maternity den from disturbance.	Preconstruction/ Construction	CDFW/City/ Construction Management	
MM BIO -16. To the extent practical no removal of native trees or shrubs shall occur in valley foothill riparian habitat. Removal of native vegetation shall be limited to the minimum area necessary to facilitate construction in valley oak woodland habitat.	Preconstruction/ Construction	City/ Construction Management	
TRANSPORTATION/TRAFFIC			
MM TRA -1. The project’s potential cumulative contribution to traffic impacts citywide will be mitigated by payment of the City’s traffic impact fee in accordance with Chapter 16.20 of the Redding Municipal Code, which is collected prior to the initiation of construction.	Preconstruction	City	

ATTACHMENT D

Responses to Public Comments

**Diestelhorst to Downtown Non-Motorized Improvement Project
Response to Public Comments Received on CEQA Initial Study/Mitigated Negative
Declaration, State Clearinghouse #2018112024**

In accordance with the California Environmental Quality Act (CEQA), an Initial Study/Mitigated Negative Declaration (IS/MND) for the Diestelhorst to Downtown Non-Motorized Improvement Project was made available to the public and interested agencies for a minimum 30-day review period. The agency review period was managed by the State Clearinghouse (SCH) and closed on December 7, 2018. The public review period was managed by staff and closed on December 10, 2018. All written comments received during the public and agency review period are attached, along with written responses to environmental issues raised by commenters on the IS/MND. Comments received on the public draft IS/MND do not identify new significant impacts or significant new information that would require recirculation of the draft IS/MND pursuant to CEQA Guidelines Section 15073.5. This technical memorandum is being used to summarize comments and support adoption of the public draft IS/MND.

Response to Comments

In addition to confirmation from the State Clearinghouse that the 30-day posting requirement was met, a total of four comment letters were received regarding the IS/MND. Three letters were received from public agencies, and one private citizen submitted an email and a letter. The confirmation and comment letters are attached to this technical memorandum in the order indicated:

State Clearinghouse compliance (Letter A)

Central Valley Regional Water Quality Control Board (Letter B)

Central Valley Flood Protection Board (Letter C)

California Department of Fish and Wildlife (Letter D)

Concerned Citizen (Letter E)

1. Letter A confirms project compliance with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA. No response is needed for this letter.
2. Letter B was submitted by the Central Valley Regional Water Quality Control Board (CVRWCQB) and includes three comments related to Clean Water Act Section 401, the Construction General Permit, and post-construction storm water requirements.

Comment B1. Clean Water Act Section 401, Water Quality Certification

Response: A Jurisdictional Delineation Report was prepared in October 2017, and a total of 0.174 acre of potentially jurisdictional waters was mapped within the project study area. The project does not propose to discharge dredge or fill material into jurisdictional waters; therefore, a 401 Water Quality Certification will not be required.

Comment B2. Construction General Permit

Response: Staff concurs. The Diestelhorst to Downtown Project will result in a land disturbance greater than one acre and CGP coverage is required. A Notice of Intent will be submitted to the State Water Board prior to construction.

Comment B3. Post-Construction Storm Water Requirements

Response: The Diestelhorst to Downtown Project is an excluded project as: the project involves the construction of new sidewalks, pedestrian ramps, and bike lanes on existing roadways; pavement grinding and resurfacing of existing roadways, and trails built to direct storm water to adjacent vegetated areas.

3. Letter C was submitted by the Central Valley Flood Protection Board (CVFPB) and includes one comment related to permitting.

Comment C1. Title 23 of the California Code of Regulations

Response: Staff concurs. While the proposed project will be constructed at an elevation that is higher than the FEMA mapped floodplain, the CVFPB's jurisdiction differs. Staff will coordinate with the CVFPB to determine if a permit is required.

4. Letter D was submitted by the California Department of Fish and Wildlife (CDFW) and includes seven comments related to sensitive natural communities, Section 1602 permitting, mitigation measures, and lighting.

Comment D1. Sensitive Natural Communities:

Response: The project will result in the permanent loss of 0.06 acre of valley foothill riparian habitat and 0.22 acre of valley oak woodland habitat. This represents 2.6% percent of the valley foothill riparian habitat within the project study area, and 9.7% of the valley oak woodland habitat within the project study area. Habitat community classification is based on the type of vegetation that is present within an area, but does not address the quality of the habitat, density of the vegetation, or the level of existing disturbance within the habitat area. The habitat areas within the project include: existing dirt footpaths ranging from 2-12 feet; an existing dirt road; a high level of transient activity; illegal camping; fires; and littering. The habitat areas are also adjacent to Court Street, an arterial roadway. To reduce potential impacts to sensitive habitat communities, the project was designed to use the existing barren and highly traveled dirt path for the pedestrian/bicycle pathway alignment. No native tree removal is anticipated in valley foothill riparian habitat area, as trail construction would occur on the existing dirt path. The existing dirt path also traverses the valley oak woodland habitat and some tree removal or tree trimming may be required. Potential tree removal includes one interior live oak, five small valley oak trees (less than 10" diameter at breast height), and one blue elderberry shrub. The vegetation within these

habitat communities will not be adversely altered, and construction will occur in an existing disturbed setting. It is anticipated that vegetation can be further avoided during construction as the path can be constructed to meander around the trees; however, Mitigation Measure BIO-16 has been incorporated to ensure impacts to sensitive natural communities are minimized to a less than significant level. Additional mitigation measures and restoration plans are not required; however, compensatory mitigation may be required for tree removal during the permitting process.

Comment D2. Lake and Streambed Alteration Agreement

Response: Staff will coordinate with the CDFW and will submit a 1602 Lake and Streambed Alteration Agreement Notification (LSAA). The project impacts, as described in the IS/MND, reflect the maximum potential impact the project may have on the environment. The Initial Study and Mitigation Monitoring Program identify sixteen environmental conservation measures and seventeen mitigation measures. Sixteen of these mitigation measures are biological measures that adequately avoid, minimize, and mitigate the project's potential impacts to a level that is less than significant. Staff will incorporate all of these measures into the LSAA application to assist the CDFW in their review.

Comment D3. Mitigation Measure BIO-7

Response: Noted.

Comment D4. Mitigation Measure BIO-9

Response: Mitigation Measure BIO-9 will be amended as requested. The survey recommendations are noted.

Comment D5. Mitigation Measure BIO-10

Response: The amendment of Mitigation Measure BIO-9 will ensure that the CDFW is consulted if nesting birds are found.

Comment D6. Mitigation Measure BIO-12

Response: Mitigation Measure BIO-12 will be amended to say "qualified professional".

Comment D7. Lighting:

Response: For pedestrian and bicyclist safety, some lighting will be needed in the valley foothill riparian and valley oak woodland areas. This lighting will be 1.0 lux or less and would not result in adverse impacts to wildlife. Lighting along all areas of the pedestrian and bicycle path have been designed to produce light at 1.0 lux or less and will be directed only to areas of intended illumination. The lighting near the river will be installed with the light directed away from the river. Staff will coordinate a post-construction field review with CDFW to view the area and determine if light measurement testing is needed.

5. Letter E is comprised of an email and a letter submitted by a concerned citizen. The email and the letter include a total of fourteen comments related to public notice, alternatives, alternatives analysis, Level of Service, mitigation, project need, project use, air quality, hazards and hazardous waste, hydrology and water quality, fire and police, and transportation and traffic.

Comment E1. Public Notice:

Response: A public open house was conducted for the Project on February 8, 2018. The open house was advertised in the newspaper, on social media, a story was published in the Record Searchlight, and letters were sent to nearby property owners. Over 100 interested parties attended the open house. Open house attendees were asked to provide comments and vote for their preferred project alternative. Ninety-two meeting attendees voted on the alternatives: 59 voted for a complete closure of Riverside Drive, 13 voted for a one-way closure of Riverside Drive, and 20 voted for Riverside Drive to remain open.

CEQA requires that a Notice of Intent (NOI) to adopt a Mitigated Negative Declaration be advertised in one of the following ways: an advertisement in the newspaper, posting a notice on and off site where the project is located, or direct mailing to property owners adjacent to the project. Instead of selecting one method, the Diestelhorst to Downtown NOI was advertised in the newspaper, sent to the State Clearinghouse, and letters were sent to all property owners within 300-feet of the project. Additionally, the NOI and IS/MND were posted on the City's website, made available at the City Hall permit counter, and posted at the Shasta County Clerk's Office.

Comment E2. Alternatives Analysis:

Response: The purpose of an Initial Study is to determine the environmental impacts associated with a proposed project and to determine if the project will have a significant adverse effect on the environment. As such, the proposed project alternative is the only alternative that requires evaluation.

Comment E3. Alternatives:

Response: Many alternatives were considered during the planning phase of the Project; however, many were not viable as they resulted in greater environmental impacts, were infeasible, or they did not meet the grant requirements for the project. A manually activated stop light at the railroad crossing would not be a viable alternative due to traffic and safety concerns. Vehicle cues could block adjacent roadways, the vertical and horizontal curve at the crossing limits sight distance, and the road grade in this location would result in a very long crossing period for non-motorized traffic.

Comment E4. Level of Service and Traffic Mitigation:

Response: As described in the Initial Study, a LOS “D” has been established as the CEQA threshold for arterial roadways within the City of Redding. All study intersections remain at a LOS “D” or higher with implementation of either Alternative 1 or Alternative 2 (existing + project). The re-distribution of traffic will not cause the LOS to decline below the LOS threshold; therefore, the project’s short-term effects are less than significant and mitigation is not required.

The cumulative traffic (existing + project + 20 years of population growth) will result in a LOS “F” at the Court Street and Eureka Way intersection by the year 2040. The City will mitigate this impact by paying the project’s fair share contribution to the Citywide Transportation Development Impact Fee (TIF) for future intersection improvements at this location. TIF project priorities are updated on an ongoing basis through the City’s Capital Improvement Plan. This intersection is also projected to operate at a LOS “F” by the year 2040 with no project.

Comment E5. Project Need and Estimated Use

Response: The City of Redding’s existing trail system is highly used by non-motorized traffic, as is Riverside Drive. This project will extend the trail system and create a connection to downtown area businesses and surrounding neighborhoods. Once the connectivity is established, the City anticipates increased use. The City has coordinated with, and received strong project support from, other government agencies, non-government organizations, private groups, and private citizens. As mentioned in Response E1, the Project open house was well attended and 78% of those that voted were in favor of either a partial or full closure of Riverside Drive.

Comment E6. Air Quality

Response: The net cumulative air quality impacts will be less than significant and the project would be consistent with the City’s emission reduction goals of 20 to 25 percent as established in the Air Quality Element of the General Plan.

Comment E7. Hazards and Hazardous Waste, Sections G & H

Response: Emergency responders will have access on Riverside Drive from Market Street to Caltrans west parking area. Approximately 600-feet of the roadway would be restricted by bollards. Bollards are installed at the entrance to most of the City’s existing areas trails, and the emergency responders are trained to open them when access is needed. The project would not adversely affect response times, the project would not impair or interfere with an adopted emergency response plan, and operation of the project would not increase the existing wildfire potential.

Comment E8. Hydrology and Water Quality, Section I

Response: While the trail is shown within the mapped floodplain, it sits at a higher elevation than the mapped floodplain elevation. Only one portion of the new path will be

within the mapped floodplain elevation and that is at an existing low water crossing. The new trail will be operated as the existing trails are, and signs will be posted in the flood area. The trail will also be closed to the public during high flow events that create risk. No new structures are proposed within the floodplain elevation.

Comment E9. Fire and Police

Response: See response to Comment E7.

Comment E10: Transportation and Traffic

Response: Transportation impacts are calculated using traffic modeling software and quantitative analysis. The IS/MND includes mitigation for the project's cumulative traffic impacts.

Comment E11. Transportation and Traffic

Response: The ADT figures accurately represent the redistribution of traffic to other routes and the Table 2 LOS was calculated using approved quantitative methodologies.

Comment E12. Transportation and Traffic

Response: See response to Comment E4.

Comment E13. Transportation and Traffic

Response: See response to Comment E10.

Comment E14. Level of Service

Response: See response to Comment E4.

Letter A



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

RECEIVED
DEC 12 2018
ENGINEERING
DIVISION

December 10, 2018

Amber Kelley
City of Redding
777 Cypress Avenue
Redding, CA 96001

Subject: Diestelhorst to Downtown Non-Motorized Improvement Project
SCH#: 2018112024

Dear Amber Kelley:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 7, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in black ink that reads "Scott Morgan".

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018112024
Project Title Diestelhorst to Downtown Non-Motorized Improvement Project
Lead Agency Redding, City of

Type MND Mitigated Negative Declaration

Description The proposed project would consist of a trail connection that starts at the north end of the project area where it would tie into the existing Sacramento River Trail system at the parking lot on the south side of the river, near the Diestelhorst Bridge. Two 12-ft-wide paved trails would be constructed between the parking lot and Riverside Dr. Proposed improvements include sidewalk gap completion, improved intersection facilities, corridor lighting, an enhanced crossing with rapid flashing beacons at Court Street, and a dedicated cycling and pedestrian pathway requiring either a one-way or full closure of Riverside Dr from Court St to Center St. Most of the work would occur in the city's ROW; however, a minor amount of utility acquisition would be required.

Lead Agency Contact

Name Amber Kelley
Agency City of Redding
Phone (530) 225-4046 **Fax**
email
Address 777 Cypress Avenue
City Redding **State** CA **Zip** 96001

Project Location

County Shasta
City Redding
Region
Lat / Long 40° 35' 28" N / 122° 24' 3" W
Cross Streets N Court St at 11th; Riverside Dr at N Court St; Center St and Shasta St
Parcel No. multiple
Township **Range** **Section** **Base** Sanbus

Proximity to:

Highways 299, 44, 273
Airports Benton Airpark
Railways UPRR
Waterways Sacramento River
Schools U Prep, Coop Pre-School
Land Use Z: OS, GO, GC, LO, PF, RS-3.5, -12, -20, Mixed use; GPD: PF-I-S, LO, GO, GC, R-3.5-6 and 10-20, PK, GWY

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Landuse; Minerals; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian

Reviewing Agencies Resources Agency; Central Valley Flood Protection Board; Department of Fish and Wildlife, Region 1; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 2; Regional Water Quality Control Bd., Region 5 (Redding); Air Resources Board, Transportation Projects; Delta Stewardship Council; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 11/08/2018 **Start of Review** 11/08/2018 **End of Review** 12/07/2018



Central Valley Regional Water Quality Control Board

RECEIVED

NOV 26 2018

ENGINEERING DIVISION

21 November 2018

City of Redding
Attn: Amber Kelley
777 Cypress Avenue
Redding, CA 96001

COMMENTS ON THE MITIGATED NEGATIVE DECLARATION FOR THE PROPOSED DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT, REDDING, SHASTA COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA). On 12 November 2018, we received your request for comments on the Mitigated Negative Declaration for the Proposed Diestelhorst to Downtown Non-Motorized Improvement Project.

The applicant proposes to create a trail connection that starts at the north end of the project area where it would tie into the existing Sacramento River Trail system at the parking lot on the south side of the river, near the Diestelhorst Bridge. The proposed project area includes the area from North Court Street from its intersection with 11th Street to just northwest of the south bank of the Sacramento River (near Diestelhorst Bridge); Riverside Drive between North Court Street and Center Street; and Center Street southeast to Shasta Street.

Based on our review of the information submitted for the proposed project, we have the following comments:

Clean Water Act (CWA) Section 401, Water Quality Certification

The Central Valley Water Board has regulatory authority over wetlands and waterways under the Federal Clean Water Act (CWA) and the California Water Code, Division 7 (CWC). Discharge of dredged or fill material to waters of the United States requires a CWA Section 401 Water Quality Certification from the Central Valley Water Board. Typical activities include any modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc. 401 Certifications are issued in combination with CWA Section 404 Permits issued by the Army Corps of Engineers. The proposed project must be evaluated for the presence of jurisdictional waters, including wetlands and other waters of the State. Steps must be taken to first avoid and minimize impacts to these waters, and then mitigate for unavoidable impacts. Both the Section 404 Permit and Section 401 Water Quality Certification must be obtained prior to site disturbance. Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the

Comment
B1

California Water Code. Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at:

http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf

Comment
B2

General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP)

Construction activity, including demolition, resulting in a land disturbance of one acre or more must obtain coverage under the CGP. The Project must be conditioned to implement storm water pollution controls during construction and post-construction as required by the CGP. To apply for coverage under the CGP the property owner must submit Permit Registration Documents electronically prior to construction. Detailed information on the CGP can be found on the State Water Board website:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/construction_general_permits

Post-Construction Storm Water Requirements

Comment
B3

Studies have found the amount of impervious surface in a community is strongly correlated with the impacts on community's water quality. New development and redevelopment result in increased impervious surfaces in a community. Post-construction programs and design standards are most efficient when they involve (i) low impact design; (ii) source controls; and (iii) treatment controls. To comply with Phase II Municipal Storm Water Permit requirements the City of Redding must ensure that new developments comply with specific design strategies and standards to provide source and treatment controls to minimize the short and long-term impacts on receiving water quality. The design standards include minimum sizing criteria for treatment controls and established maintenance requirements. The proposed project must be conditioned to comply with post-construction standards adopted by the City of Redding in compliance with their Phase II Municipal Storm Water Permit.

If you have any questions or comments regarding this matter, please contact me at (530) 224-4783 or by email at Dannas.Berchtold@waterboards.ca.gov.

Dannas Berchtold for

Dannas J. Berchtold
Engineering Associate
Storm Water & Water Quality Certification Unit

DJB: db

cc w/o

enclosures: Mr. Matt Kelley, U.S. Army Corps of Engineers, Redding
Ms. Donna Cobb, Department of Fish and Wildlife, Region 1, Redding

CENTRAL VALLEY FLOOD PROTECTION BOARD

3310 El Camino Ave., Ste. 170
SACRAMENTO, CA 95821
(916) 574-0609 FAX: (916) 574-0682



RECEIVED

DEC 03 2018

ENGINEERING
DIVISION

November 27, 2018

Ms. Amber Kelley
City of Redding
777 Cypress Avenue
Redding, California 96001

Subject: Diestelhorst to Downtown Non-Motorized Improvement Project,
Mitigated Negative Declaration, SCH Number: 2018112024

Location: Shasta County

Dear Ms. Kelley,

Central Valley Flood Protection Board (Board) staff has reviewed the subject document and provides the following comments:

Comment

- C1 The proposed project is within the Sacramento River, a regulated stream under Board jurisdiction, and may require a Board permit prior to construction.

The Board's jurisdiction covers the entire Central Valley including all tributaries and distributaries of the Sacramento and San Joaquin Rivers, and the Tulare and Buena Vista basins south of the San Joaquin River.

Under authorities granted by California Water Code and Public Resources Code statutes, the Board enforces its Title 23, California Code of Regulations (Title 23) for the construction, maintenance, and protection of adopted plans of flood control, including the federal-State facilities of the State Plan of Flood Control, regulated streams, and designated floodways.

Pursuant to Title 23, Section 6 a Board permit is required prior to working within the Board's jurisdiction for the placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee.

Permits may also be required to bring existing works that predate permitting into compliance with Title 23, or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the works has not been clearly established or ownership and use have been revised.

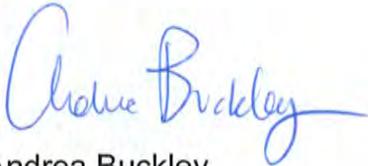
Ms. Amber Kelley
November 27, 2018
Page 2 of 2

Other federal (including U.S. Army Corps of Engineers Section 10 and 404 regulatory permits), State and local agency permits may be required and are the applicant's responsibility to obtain.

Board permit applications and Title 23 regulations are available on our website at <http://www.cvfpb.ca.gov/>. Maps of the Board's jurisdiction are also available from the California Department of Water Resources website at <http://gis.bam.water.ca.gov/bam/>.

Please contact James Herota at (916) 574-0651, or via email at James.Herota@CVFlood.ca.gov if you have any questions.

Sincerely,



Andrea Buckley
Environmental Services and Land Management Branch Chief

cc: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044



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

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



Letter D

December 5, 2018

Amber Kelley
City of Redding
777 Cypress Avenue
Redding, CA 96001

Subject: Review of the Mitigated Negative Declaration for the Diestelhorst to Downtown Non-Motorized Improvement Project, State Clearinghouse Number 2018112024, City of Redding, Shasta County

Dear Ms. Kelley:

The California Department of Fish and Wildlife (CDFW) has reviewed the Mitigated Negative Declaration (MND) dated November 2018, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and their habitat. As a responsible agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq.

Project Description

The Project as proposed:

"would consist of a trail connection that starts at the north end of the project area where it would tie into the existing Sacramento River Trail system at the parking lot on the south side of the river, near the Diestelhorst Bridge. Two 12-foot-wide paved trails would be constructed between the parking lot and Riverside Drive. Proposed improvements include sidewalk gap completion, improved intersection facilities, corridor lighting, an enhanced crossing with rapid flashing beacons at Court Street, and a dedicated cycling and pedestrian pathway requiring either a one-way or full closure of Riverside Drive from Court Street to Center Street."

The Project in total is approximately 15.32 acres. A Natural Environmental Study (NES) was completed by Stantec in August 2018.

Conserving California's Wildlife Since 1870

According to the NES and MND, approximately 2.23 acres of valley foothill riparian habitat and 2.26 acres of valley oak woodland habitat occur within the project area. Construction of the new pathways and associated project features would result in a permanent loss of 0.06 acre of valley foothill riparian habitat and 0.22 acre of valley oak woodland habitat. In addition, approximately 0.01 acre of valley foothill riparian habitat and 0.04 acre of valley oak woodland would be temporarily impacted during project construction.

Comments and Recommendations

Valley foothill riparian and valley oak woodland habitats are considered sensitive natural communities by CDFW. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents. Valley foothill riparian and valley oak woodlands are both State ranked as S3. State Rank S3 is defined as vulnerable due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation.

On a national, statewide, and regional scale, wetland and riparian habitats have undergone substantial declines. An estimated 93 percent to 98 percent of California's riparian habitat has been converted to other land uses (Katibah 1984, Dawdy 1989). Removal of or impacts to valley foothill riparian or valley oak woodland habitat are considered a significant impact by CDFW. The MND states mitigation measure number 16 will ensure the potential Project-related impacts would be less than significant. Mitigation measure 16 simply states:

"To the extent practical no removal of native trees or shrubs shall occur in valley foothill riparian habitat. Removal of native vegetation shall be limited to the minimum area necessary to facilitate construction in valley oak woodland habitat."

A mitigation measure for unavoidable impacts should be developed and discussed within the MND. For unavoidable impacts, the feasibility of onsite habitat restoration or enhancement should be discussed. If onsite mitigation is not feasible, offsite mitigation through habitat creation, enhancement, acquisition and preservation in perpetuity should be addressed. Valley foothill riparian habitat should be mitigated at a 5:1 ratio with valley oak woodland habitat mitigated at 3:1.

Restoration plans should be prepared by persons with expertise in northern California ecosystems and native plant revegetation techniques. The restoration plan shall be approved by CDFW prior to any impacts to the sensitive natural communities.

Lake or Streambed Alteration Notification

Comment
D2

The Project will require notification to CDFW and a Lake and Streambed Alteration Agreement (LSAA) pursuant to Fish and Game Code section 1602 for the portion of trail near the Diestelhorst Bridge which is located on the bank of the Sacramento River. The Project applicant is required to notify CDFW prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream, or lake, or use material from a streambed. CDFW's issuance of an LSAA for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. CDFW will consider the local jurisdiction's (Lead Agency) MND for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the MND should fully identify the potential impacts to the lake, stream, or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. The MND does not currently provide a detailed enough description of avoidance and mitigation measures for CDFW to accurately advise the City of Redding (City) on what additional measures would be required in an LSAA.

Mitigation Measures

Comment
D3

Mitigation Measure BIO-7 states:

"If western pond turtle or foothill yellow-legged frogs are encountered in the BSA during construction and could be harmed by construction activities, work will stop in the area and the City will notify CDFW. Upon authorization from CDFW, a qualified biologist may relocate the individual(s) the shortest distance possible to a location containing habitat outside of the work area."

At its June 21, 2017 meeting, the Fish and Game Commission designated foothill yellow-legged frog (FYLF) as a candidate species under CESA; the Office of Administrative Law published those findings on July 7, 2017. During the candidacy period, it is unlawful to take, possess, purchase, or sell within California, FYLF and any part of product thereof, or attempt any of those acts, except as authorized pursuant to CESA. Pursuant to Fish and Game Code section 86, "take" means to hunt, pursue, catch, capture, or kill, or to attempt to hunt, pursue, catch, capture, or kill. Pursuant to Fish and Game Code section 2081(b), CDFW may issue an Incidental Take Permit (ITP) authorizing the take of a candidate species when it is incidental to an otherwise lawful activity, the impacts of the take are minimized and fully mitigated, the applicant ensures there is adequate funding to implement any required measures, and take is not likely to jeopardize the continued existence of the species. Please note the methods described in mitigation measure Bio-7, including the relocation of individual

frogs, would require an ITP from CDFW. Information on how to obtain an ITP is available here: <https://www.wildlife.ca.gov/Conservation/CESA/Incidental-Take-Permits>.

Comment
D4

Mitigation Measure BIO-9 states that a qualified biologist will conduct a preconstruction survey seven days before construction activities begin if vegetation removal or construction will occur during the nesting season. This mitigation measure should also include the following (shown in **bold**):

"If vegetation removal or construction activities will occur during the nesting season for birds (February 1 through August 31), a qualified biologist shall conduct a preconstruction survey 7 days before construction activities begin. If nesting birds are found, CDFW will be notified and consulted. An appropriate buffer, as determined by CDFW and the qualified biologist, will be placed around the nest until the young have fledged."

In addition, in order to improve the effectiveness of nesting bird surveys, CDFW recommends surveys begin prior to sunrise and continue until vegetation and nests have been sufficiently observed. Survey results should include a description of the area surveyed, time and date of surveys, ambient conditions, bird species observed in the area, a description of any active nests observed, any evidence of breeding behaviors (e.g., courtship, carrying nesting material or food, etc.), and a description of any outstanding conditions that may have impacted survey results (e.g., weather conditions, excess noise, predators present, etc.).

Comment
D5

Mitigation Measure BIO-10 states that no construction activities shall occur within 250 feet of the nest unless a smaller buffer zone is approved by CDFW. A 250-foot buffer may not be large enough depending upon the specific bird species and its tolerance for disturbance. In some instances, a 250-foot buffer may be larger than required for the species in question and would unnecessarily prohibit Project activities. To avoid the establishment of buffers that may be ineffective, the City should consult with CDFW if any bird species is found nesting within the Project area in order to determine the appropriate buffer zone around the nest.

Comment
D6

Mitigation Measure BIO-12 should say a *"qualified bat biologist shall conduct a preconstruction survey of the BSA to locate maternity colonies and identify measures to protect colonies from disturbance."*

Lighting

Comment
D7

CDFW recognizes the effects of artificial lighting on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse

Amber Kelley
City of Redding
December 5, 2018
Page 5

effects of artificial light on wildlife, CDFW recommends that lighting fixtures associated with the Project not be placed within the valley oak riparian or valley oak woodland habitats. All other lighting should be downward facing, fully shielded and designed, and installed to minimize photo pollution. If lighting must occur within the riparian or oak woodland habitat, it should be considered a significant impact, and mitigation measures designed to avoid, minimize, or compensate for the impacts should be discussed in the MND.

In addition to the impact of lighting on terrestrial species, lighting may also adversely impact fisheries. The area of the Sacramento River immediately adjacent to the proposed Project has been documented by CDFW staff to be a spawning and rearing area of critical importance to salmonids. To minimize impacts to adult spawning behavior and juvenile salmonid migration, trail lighting, both temporary and permanent, shall be kept to the absolute minimum necessary to provide safe pedestrian and automobile access. Lighting should only be directed at areas intended for illumination. Light reaching the water surface of the Sacramento River immediately below and adjacent to the trail alignment shall be kept as close to 1.0 lux as feasible. Within 45 days of completion of light installation, the City should provide CDFW measurements of lighting intensities, at water level, immediately below, and at stations 50 feet, 100 feet, and 200 feet upstream and downstream the trail lights. If 1.0 lux is substantially exceeded at any of these locations, corrective actions should be made to bridge lighting to achieve the desired illuminance.

If you have any questions, please contact Amy Henderson, Environmental Scientist, at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,



Curt Babcock
Habitat Conservation Program Manager

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Amy Henderson, Adam McKannay
California Department of Fish and Wildlife
Amy.Henderson@wildlife.ca.gov, Adam.McKannay@wildlife.ca.gov

References

- Dawdy, D.R. 1989. Feasibility of mapping riparian forests under natural conditions in California. pages 63-68 in: Proceedings of the California Riparian Systems Conference. GTR PSW-110. Davis, CA.
- Katibah, E.F. 1984. A brief history of riparian forests in the Central Valley of California. pages 23-29 in: R.E. Warner and K.M. Hendrix (eds) California riparian systems: ecology, conservation and productive management. University of California Press, Berkeley, CA.

Letter E

From: Charley Fitch <scfitch23@gmail.com>

Sent: Wednesday, December 5, 2018 10:54 AM

To: Resner, Erin; Dacquisto, Michael; kschreder; Winter, Julie; McElvain, Adam

Subject: Fwd: COMMENTS ON THE NEGATIVE DECLARATION

Dear Redding City Councilperson,

I have submitted comments regarding the Notice of Intent to adopt a Mitigated Negative Declaration for the Diestelhorst to Downtown Non-Motorized Improvement Project to the Environmental Compliance Manager and a copy is attached to this memo.

Comment

E1

I call this to your attention as this subject has previously come before the Council but I have to say it was not well advertised at the time and blind sided many of us 4,000 users of the roadway known as Riverside Dr.. I do not begrudge non-motorized traffic in Redding but do feel that this project calls for a all or nothing solution. Actually a No

Comment

E2

Action alternative was not even evaluated , so the proposal is deficient in not actually evaluating the need of the project. I believe there are better alternatives that can achieve a reasonable solution to both motorized and non-motorized uses. One of those alternatives is included within my comments. I have had other citizens bring to me further alternatives.

I would ask that the Redding City Council again review this project prior to any further action.

Sincerely,

Charles Fitch

1112 Coggins St.

Letter E

COMMENTS ON THE:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT

Summary The Initial Study proposed two alternatives and did not even include a no action alternative. I believe that a no action alternative should be included in the analysis to better demonstrate if there is really a need to stop the flow of a documented 4,000 Redding citizens on a daily basis from using Riverside Drive as a roadway as it has been used for I would guess now over 100 years. I believe there is also a third if not many more action alternatives that could achieve the unstated goal of providing ADA and pedestrian traffic from the downtown area to the river trail.

Under the proposed alternative 4,000 vehicles per day would be prevented from using Riverside Drive while no projections are made for how much use the resulting trail would incur even at the best of weather. And we all know that Redding is subject to the extremes of very hot and very wet periods. These are periods when virtually no trail use is found in Redding. But the vehicles continue to use Riverside Drive regardless of weather conditions. It is a shame that an alternative was not found for study that would actually incorporate both uses as opposed to blindly shutting one down to promote the other.

I have briefly outlined a third action alternative that I believe would provide both vehicle and pedestrian uses. This would incorporate use of a pedestrian "stop light" for that section of Riverside Dr. when access is needed by a pedestrian or a wheel chair vehicle. It would be activated by the person using the proposed trail and could incorporate either one or both lanes of that portion of Riverside Dr. from Center St. to Benton as needed. This would then leave Riverside Dr. open to vehicle traffic and emergency traffic the remainder of the time. Which I am guessing would be at least 23 hours a day.

COMMENTS ON THE:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE DIESTELHORST TO DOWNTOWN NON-MOTORIZED IMPROVEMENT PROJECT

Your analysis covers two alternatives which I would say are both short sighted. Of course a third alternative would be to do nothing. But yet another alternative would be to establish a stop light at the Riverview Dr. crossing under the railroad bridge. This would likely be for only the west bound lane and would be activated by any person on foot or in a wheel chair that wishes to use the "12 foot wide trail/roadway". Bicycles are included in your proposal but of course they are already classed as a vehicle as they are non-motorized but are subject to the same laws as motor vehicles and share the road way with those vehicles. This would be noted on South Street in the Garden District where large painted logos are located in the driving lane of the roadway. Telling drivers that they are to share the road with bicycles as is the law. When a person wishes to use the underpass area of Riverside Street for walking

Comment
E3

they would activate the red light to stop any vehicles from using that lane of the roadway. All other times the roadway would be just a roadway available to common citizens and emergency traffic.

In your analysis you have failed to mitigate any transportation issues which you state the City of Redding is already beyond acceptable limits of Level of Service (LOS). I would not agree that paying a fee into a fund would help to ease any of the new negative impacts that closing Riverview Drive will cause. It may be a legal recourse to put money into a fund but it does NOT improve or even leave the LOS at the present below attainment state.

Comment

E4

Closure of Riverview Dr. will directly impact 4,000 vehicles per day and indirectly impact another 15,000+ vehicles as the 4,000 vehicles use alternate routes and cause further delays at Eureka Way and Court St. , Quartz Hill Rd. and Benton and Quartz Hill Rd. and Market Street. I would guess that early morning traffic on Court St. and Eureka Way would back up all the way to the 11th street light on Court St..

MITIGATION MEASURES

MMTRA-1 Though it may be legal for this project to close roads and impact the citizens of Redding if the project pays a fee to the City LOS-fund. Though legal it is pretty lame and not in the best interest of the citizens that you are supposed to be representing. There is little to no need for two 12 foot wide trails (known to us as Riverview Drive) when an acceptable alternative is available.

Comment

E5

I note that you have not prepared any estimates for just how much use you would anticipate this new "trail" would get. In the 14 plus years that I have been using Riverview Dr. I have encountered very few pedestrians. And since the homeless camps were closed out near the River trail I have encountered almost none. I would acknowledge that there are office workers in the Riverview Dr. area that do access the river trail from their offices during break times. Bicycles as stated earlier are subject to the same laws as motor vehicles and share the road way with them. I have never seen any cars push or crowd any bicyclists on this roadway.

I found many areas in the " INITIAL STUDY" that provided a basis for the Negative Declaration. Those items are listed below. Many show what I believe to be a SIGNIFICANT IMPACT. That is not demonstrated or resolved within the Negative Declaration.

AIR QUALITY Air quality will be adversely impacted. This project will NOT contribute to any reduction in emissions. In fact it will increase emissions as a result of vehicles having to sit at the aforementioned cross streets waiting for the additional traffic to clear.

Comment

E6

VIII HAZARDS AND HAZARDOUS MATERIALS

G. Project would impair and physically interfere with an adopted emergency response plan or evacuation plan. As seen lately with the Carr Fire this can be a SIGNIFICANT IMPACT on the local citizens as well as emergency responders. The use of removable bollards does not help in an emergency. I would ask, "can you hold your breath for as long as it takes for an emergency vehicle to stop and remove the bollards?" My guess is NO. So these bollards do not mitigate the negative effects of a road closure in an emergency. SIGNIFICANT IMPACT

Comment
E7

H. By closing Riverview Dr. you are exposing people and structures to a SIGNIFICANT RISK of loss, injury or death involving wildland fire. It has only been a few years ago when we have had a significant fire along the river edge below Riverside Dr.. By closing this roadway you are inhibiting the emergency responders to access the fire. SIGNIFICANT IMPACT

IX HYDROLOGY AND WATER QUALITY

- I. This project will expose people and constructed features to risk of flooding by inviting the public use into the river flood plain. Note—the Sacramento river is not just north of the project but the project is within the flood plain of the Sacramento River.

Comment
E8

XIV. FIRE AND POLICE

The time to remove the temporary bollards as called for in the proposal will cause a SIGNIFICANT IMPACT on response times for these emergency response vehicles. Or the vehicles will need to go around to use other access which also delays response times. When multiple response vehicles are involved they will be hindered by the limited one way access.

Comment
E9

XVI. TRANSPORTATION /TRAFFIC

There is no mitigation for loss of this access, therefore the chart should show:

POTENTIALLY SIGNIFICANT IMPACT to (a), (b) and (e).

TABLE 2.

ADT figures fail to account for loss of Riverside Dr. traffic. With this loss the TABLE 2 should be as follows:

Quartz Hill and Benton should go from a "D" to "E" or "F"

Eureka Way and Court St. should go from "D" to "F"

Market St. and Quartz Hill should go from "D" to "E"

Market and Eureka Way should go from "C" to "D"

THRESHOLD OF SIGNIFICANCE shows as an UNACCEPTABLE REDUCTION OF LEVEL OF SERVICE and therefore requires payment to the City Wide Transportation Development Impact Fee (TIF) for money to use elsewhere that DOES NOT HELP this situation. Therefore it does not truly qualify as a mitigation towards attainment of an acceptable solution to the losses caused by this project

Comment
E12

MITIGATION

Comment
E13

There is NO PROPOSED MITIGATION for the loss of access to the 4,000 plus vehicles per day. The proposed benefit is that an unestimated few individuals can walk along this “ 12 or 24 foot wide trail”.

When one considers the weather in Redding and how many days or times there are when you do not see any use at all of the river trail when it is very hot or wet or cold. All of those days and times are days and times when vehicle traffic continues to flow in Redding and continues to use Riverside Drive. So you get use 365 days of the year and 24 hours a day. As opposed to the restricted movements of pedestrian traffic which does not occur during many days of the year and even then only for short periods of time during any day.

Comment
E14

The City of Redding is already below compliance levels for LEVEL OF SERVICE, this project will push the City further from achieving that attainment especially in the already congested downtown area.