



# Shasta Birding Society

## A Wintu Country Chapter of the National Audubon Society

P.O. Box 994533, Redding, CA 96099-4533

February 27, 2026

Jeremy Pagan, Development Services Director  
City of Redding

Subject: Notice of Preparation of the Redding Riverfront Specific Plan Draft  
Environmental Impact Report

Dear Mr. Pagan:

Shasta Birding Society is pleased to provide the following response to the Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the Redding Riverfront Specific Plan (Plan). The Plan will provide a community vision and establish goals, policies, and development standards to guide public and private development, land stewardship and conservation, roadway and infrastructure projects, and other activities within the study area from the Redding Rodeo Grounds and Civic Auditorium to Cypress Ave. We have the following comments on the scope and content of the environmental analysis we believe must be included in the EIR.

Shasta Birding Society is an active chapter of the National Audubon Society, covering Shasta and portions of Tehama, Trinity, Siskiyou and Modoc counties in California. Shasta Birding Society has an active Board of Directors and Conservation Committee engaged in advocating for conservation and restoration of natural ecosystems, focusing on birds, other wildlife, and their habitat. Shasta Birding Society also promotes the enjoyment of the natural environment through education and interactive programs. We are concerned about the bird, bat and other wildlife impacts that may result from this major land use project.

The Turtle Bay area, including the Bird Sanctuary and adjacent areas between the main reaches of the River and existing development, streetscapes and pathways, is widely recognized for its high-quality riparian habitat. The avian and wildlife resources supported by these riparian and aquatic habitats are extremely important to the Redding and north State community, as recognized by the Cornell University eBird database which includes two "hotspots" within the study area, Sundial Bridge and Turtle Bay Bird Sanctuary (<https://ebird.org/hotspot/L168182> and <https://ebird.org/hotspot/L937554>).<sup>1</sup> Many Redding residents as well as regional and long-distance travelers consider the area a destination-worthy stop on any bird and wildlife viewing trip. (All within walking distance of downtown Redding!) In addition, the aquatic portions of the study area downstream

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<sup>1</sup> Sundial Bridge: 172 species, 889 eBird checklists to date; Turtle Bay Bird Sanctuary: 198 species, 1139 checklists to date.

from Hwy 44 host large concentrations of water birds and waterfowl and are prime forage areas for raptors and other bird species.

Protection of the riparian habitats within the Plan area is key to maintaining their quality and attractiveness to the many Redding residents whose quality of life is enhanced by them, as well as visitors who value the Plan area for its diversity of bird species while contributing to Redding's economic vitality. Such protection is also essential to prevent or mitigate for impacts to rare and special status bird species. The EIR must analyze impacts to riparian habitat and the Sacramento River corridor, including increased human use, lighting, noise, pets, runoff and shoreline disturbance. The EIR must analyze impacts to special status wildlife species which utilize the riparian corridor and the River.

In previous written comments during the Plan development process, we have pointed out the essential need for including no-disturbance buffers in the Plan framework. (Please see letter dated May 12, 2022, attached.) Such buffers are used in many similar riverine environments to protect riparian resources and wildlife habitat.<sup>2</sup> Without such buffers, riparian areas can be degraded from human influence including noise, lighting, pets, soil compaction, increased storm runoff and pollutants. To be effective for protecting riparian resources, such buffers must be unimproved, ie they must consist of naturally vegetated areas where soil remains uncompacted and hardscape and pathways which increase volume and rate of surface runoff are not allowed. We are dismayed to find that the revised "Riverfront Concepts" plan dated November 18, 2025 instead suggests a standard 150-foot "setback" for structures from the top of bank of the River. Although this "setback" appears to include the Turtle Bay Bird Sanctuary, it leaves large sections of riparian forest in the vicinity of the Museum and the Hotel, mapped as Great Valley Cottonwood Riparian Forest, Great Valley Mixed Riparian Forest and Great Valley Riparian Scrub<sup>3</sup>, unprotected and subject to development. The potential impact of conversion of these riparian natural communities and vegetation complexes must be examined. Although the potential for on-site restoration as a preferential mitigation option must be examined, there may be no effective means to adequately mitigate for such impacts.

Moreover, the 150-foot setback suggested by the "Riverfront Concepts" plan is arbitrary and not based on any scientific or commonly accepted metric for such buffers. Its apparent purpose is to protect the River itself from development impacts, but it ignores the importance of the riparian zone which parallels the River's edge wherever development has not removed it, as a valuable biological resource and essential habitat. This arbitrarily sized setback will also conflict with implementation of riparian restoration at the upstream end of the study area between the Rodeo Grounds, the Civic Auditorium, and existing riverside vegetation, as suggested at page 11 of the "Riverfront Concepts" plan. The EIR must analyze the use of no-disturbance, no-improvements buffers between riparian areas and any developed or public area, including building footprints, streets, other hardscape, and managed paths and landscaping.

The EIR must study the potential impacts on wildlife and habitat of the increased scale of development of the Plan, and the attendant increases in daily human visitation, peak hourly

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<sup>2</sup> See examples of buffer function, selection and need at [www.epa.gov/system/files/documents/2021-11/bmp-riparian-forested-buffer.pdf](http://www.epa.gov/system/files/documents/2021-11/bmp-riparian-forested-buffer.pdf) and at [www.mdpi.com/1424-2818/14/3/172](http://www.mdpi.com/1424-2818/14/3/172) and at [nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=163508](http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=163508)

<sup>3</sup> "Redding Riverfront Specific Plan Biological Constraints Report", October 28, 2024, Figure 3.

visitation, and expanded hours per day. (Currently, on most days there is no activity after dark. Under the new Plan, nighttime and weekend visitation may increase dramatically.) The EIR must analyze the options for mitigation of such impacts, including the option of incorporating no-disturbance buffers between development (structures, roads, parking areas, hardscape and other improvements), and existing or restored riparian resources.

The intensity of human intrusion will increase under the Plan, both in total visitation and in wider time spans each day. The EIR must analyze how these increases might impact wildlife, including but not limited to nighttime lighting and noise which could disrupt wildlife behavior, nesting birds and migration patterns and special status species.

Analysis of impacts on riparian resources and special status birds must also include cumulative impacts from similar future projects to each of the identified Sensitive Natural Communities and Vegetation Alliances (as identified on the California Natural Diversity Database (CNDDDB)) present in the Specific Plan study area,<sup>4</sup> as well as cumulative impacts to special status birds which use these sensitive vegetation communities and the River.

The preservation and enhancement of natural environments in the study area including existing riparian resources have scored very high in importance during public participation of the Plan to date. The importance of such preservation calls for them to be cited as primary goals and objectives of the Plan, not simply as mitigation for impacts of development permitted by the Plan. Nonetheless, their citation as goals and objectives of the Plan must not supplant their implementation when called for as mitigation of development allowed by the Plan.

The EIR must analyze a full spectrum of mitigation measures for impacts of the Plan on riparian habitat and wildlife. Mitigation classed as prevention or minimization of impacts could include the expansion of buffers between riparian areas and development including hardscape, placing sensitive habitats into conservation easements or other effective protective status options. Mitigation for potential impacts on nesting birds should include carefully selected construction activity timing to avoid disturbance to nesting birds and adequate setbacks from noise and vibration, as recommended by CA Department of Fish and Wildlife (CDFW) and based on protocol surveys. These measures should be preferred to removal of nesting materials, as suggested by the “Redding Riverfront Specific Plan Biological Constraints Report”,<sup>5</sup> due to the rarity and sensitivity of the study area’s riparian resources and rare and sensitive vegetation communities.

Mitigation classed as compensation for habitat losses, including riparian habitat or wetland losses, should prioritize on-site restoration, replacement or enhancement rather than off-site compensatory options such as purchasing mitigation bank credits, due to the rarity, sensitivity and importance to the local community of the resources.

Although mitigation for individual projects constructed under the Plan will be typically implemented at the time of permitting, the range of mitigation options, their projected

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<sup>4</sup> “Redding Riverfront Specific Plan Biological Constraints Report, 4.2.1 Sensitive Natural Communities/Riparian Habitat”, October 28, 2024, p. 19

<sup>5</sup> Ibid, “5 Recommendations and Design Considerations, Nesting Birds” p. 34

effectiveness, and the projected significance of impacts after mitigation must all be analyzed.

Pursuant to CEQA and the Fish and Game Code, CDFW has an important role to play as a trustee agency for wildlife and its habitat. We strongly encourage the timely participation by Region 1 staff of CDFW in the scoping of environmental review, the potential for impacts to biological resources, and the range and effectiveness of mitigation options, including design and implementation of no-disturbance buffers.<sup>6</sup> We strongly encourage the City to reach out to Region 1 staff to request their early participation as trustee agency.

Thank you for the opportunity to respond to the NOP. If you have any questions, please don't hesitate to contact me through our Facebook page or by email to shastabirding@gmail.com.

Sincerely,

[Redacted signature and contact information]

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<sup>6</sup> Section 1802, CA Fish and Game Code; Section 21153, Div 13, CA Public Resources Code.