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March 2, 2026

Jeremy Pagan, Development Services Director
City of Redding
777 Cypress Avenue
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**Re: Notice of Preparation, Redding Riverfront Specific Plan (RRSP) Program
Environmental Impact Report**

Dear Director Pagan,

[REDACTED] I appreciate the opportunity to submit scoping comments on the Notice of Preparation (NOP), dated January 26, 2026.

The Redding Riverfront is one of the City's most defining civic and natural assets – *some call it the “heart of Redding” for good reason*. The NOP references the Council-accepted Vision and Guiding Principles Framework (January 16, 2024) which was developed through extensive community engagement. More than 200 residents attended the Open Houses. Over 900 people participated in the online survey. A 20-member Community Coalition refined the Vision Elements and Guiding Principles. This Framework represents broadly-supported direction for the area. **The task now is to translate that vision into durable, enforceable policy.**

Given that this will be a Program EIR under CEQA Guidelines Section 15168, it will establish the environmental baseline within which future projects may tier. (See CEQA Guidelines §§ 15152, 15168(c)–(d).) Precision at this stage is therefore essential. The scope of analysis and the assumptions embedded in this document will constrain, *or fail to constrain*, decision-making for decades. Every assumption left undefined becomes a gap through which future projects may pass without supplemental review.

I offer the following comments in that spirit.

1. Define and Constrain the Northern Riverfront Development Envelope

The Council-accepted Vision Framework provides critical direction for the Northern Riverfront. Vision Element D (Appropriate Scale and Uses) contains Guiding Principle D.4. Principle D.4 specifically addresses the Northern Riverfront. It directs the City to "create vibrant and active public uses." It further directs the City to "identify ways to maintain or reduce developed site coverage." **That language represents a community-endorsed ceiling on intensity, not a floor.** It must be implemented through objective, quantified standards in the Program EIR.

To fulfill this direction, the Program EIR must:

- A. Quantify maximum development assumptions for the Northern Riverfront. These must include aggregate building footprint, maximum building height, and total impervious surface coverage. Peak event capacity must also be quantified. These assumptions must be stated as numerical limits in the project description. Future projects tiering from this EIR must be bound by a defined development envelope. (See CEQA Guidelines § 15168(c)(5).)
- B. Analyze a reduced-footprint alternative for the Northern Riverfront. This alternative must be consistent with Guiding Principle D.4. It must be evaluated as a distinct project alternative under CEQA Guidelines Section 15126.6; not treated as a mere variation within the preferred plan.
- C. Avoid open-ended development assumptions that could allow incremental intensification over time. Where the EIR describes ranges of development, the upper bound must be the analyzed maximum. Any exceedance must require additional CEQA analysis pursuant to Sections 15162–15164.
- D. Include an explicit statement in the project description regarding future exceedances. Any future project exceeding quantified assumptions in footprint, height, coverage, or intensity shall require a subsequent or supplemental environmental document. Such projects cannot rely solely on tiering from this Program EIR.

The City of Redding General Plan 2045 reinforces this direction. Policy CDD3A restricts development in floodplains and steep slopes. Policies NR5A–NR5C protect riparian corridors and buffer areas. Policy NR9A protects prehistoric and cultural resources. Each emphasizes aligning development intensity with environmental constraints. The Program EIR must demonstrate consistency with these policies. Any inconsistencies must be disclosed as potentially significant impacts under CEQA Guidelines Section 15125(d).

California has placed increasing emphasis on objective standards in land use regulation. The Housing Accountability Act (Government Code § 65589.5) relies on clear, objective standards. SB 35 ministerial streamlining (Government Code § 65913.4) does the same. Measurable

parameters reduce ambiguity, promote fairness, and provide legal defensibility. The Specific Plan and Program EIR needs to employ mandatory language such as "shall," "must," and "will." Subjective or conditional terms such as "consider," "encourage," or "strive to" permit reinterpretation. Such language enables incremental expansion of allowable development. The Vision Framework commands broad community support. The Program EIR must translate that support into enforceable, quantified limits.

2. Clarify Residential Development Assumptions in Southern Riverfront rather than Northern Riverfront

The Redding Riverfront Specific Plan area contains distinct subareas with fundamentally different constraints and policy goals. The Northern Riverfront is characterized by riparian habitat and cultural sensitivity. It also has significant floodplain exposure. The Southern Riverfront, along Park Marina Drive, has existing commercial uses. It has infrastructure more suitable for intensification. The Program EIR needs to reflect these distinctions with precision.

Residential development may be appropriate within portions of the Southern Riverfront. This would be consistent with Guiding Principle D.5 and the City's RHNA obligations. However:

- A. The Program EIR must not analyze residential development within the Northern Riverfront. This means it must also not assume mixed-use residential development there either. The Northern Riverfront concepts identified in the NOP do not include residential uses. Those concepts are: Open Space & Habitat Restoration, Active Recreation, Civic and Cultural, and Visitor Hospitality Core. The EIR must not introduce residential assumptions absent from the project description.
- B. The EIR must explicitly state that the Northern Riverfront is not a RHNA inventory site. It shall not be designated as one. Under current state housing law, RHNA inventory sites carry zoning and density obligations. They also carry by-right development approval requirements. These obligations would be inconsistent with environmental and cultural objectives.
- C. Residential development within the 100-year floodplain must be excluded from development assumptions. The same applies to mapped riparian buffer areas. Parcels directly adjacent to the Sacramento River channel also need to be excluded. This is consistent with General Plan Policy CDD3A and RRSP Vision Elements and Guiding Principles Framework Elements A.2 and A.4.
- D. The EIR must analyze growth-inducing effects of residential assumptions in the Southern Riverfront. This includes induced demand for schools, public services, and infrastructure. CEQA Guidelines Section 15126.2(e) require this analysis.

Given recent changes in state housing law, clarity at the program level is essential. The Housing Accountability Act (Government Code § 65589.5) limits local discretion over qualifying projects.

SB 35 (Government Code § 65913.4) provides ministerial streamlining. The "no net loss" requirements (Government Code § 65863) impose additional constraints. If residential uses appear within the Northern Riverfront's development envelope, even incidentally, consequences follow. **Future projects could invoke tiering provisions for streamlined approvals. These approvals could occur in areas the community did not intend for housing. Drawing this boundary now, clearly and in writing through the EIR, prevents that outcome.**

Balanced analysis strengthens the Plan's legal defensibility. Housing should be studied where appropriate in the Southern Riverfront. It should be excluded from environmentally and culturally sensitive Northern Riverfront areas.

3. Elevate Indigenous Cultural Stewardship as a Foundational Structural Element

Vision Element B addresses "Respecting the Indigenous Community: Past, Present, and Future." **It is one of seven co-equal Vision Elements in the Council-accepted Framework.** The Guiding Principles beneath it are unambiguous. Principle B.1 calls for honoring deep Indigenous cultural connections. Principle B.2 calls for including Indigenous communities in land use decisions. Principle B.3 requires protecting sacred sites and cultural resources. Principle B.4 maintains Indigenous connections and access to land, river, and animals. Principle B.5 explores partnerships for an Indigenous-owned cultural center.

The Tribal Community Listening Session of January 11, 2024 provides critical context. The City's own summary is here:

https://www.reddingriverfront.org/files/managed/Document/118/RRSP_ILS_Summary_v.8_7-3-2024.pdf.

Approximately 50 members of the Wintu and broader tribal community attended. Participants represented multiple historic Wintu bands: Norelmuk, Nomtipom, Dawpom, Nomsus, and Winnemem. Participants also included members of Pit River, Chickasaw, Colusa (central Wintun), Purepecha, Hupa, Hawaiian, Shasta, Ohlone, Paiute, and Itsatawi communities. The Session produced detailed testimony on core Wintu values. It documented the cultural and spiritual significance of the Riverfront landscape. Participants identified known burial sites and village sites within the plan area. A consistent preference emerged against further development on culturally sensitive lands. This testimony is part of the project record. It should be treated as substantive evidence in the EIR's analysis.

Given this, the Program EIR must go well beyond the minimum requirements of AB 52 (PRC § 21080.3.1):

- A. Treat the Northern Riverfront as a contiguous cultural landscape. It must not be treated as a collection of isolated archaeological sites. A cultural landscape framework recognizes interconnected spiritual, ecological, and historical significance. This approach is consistent with Wintu worldviews articulated in the Listening Session. It also aligns

with PRC Section 21074(a). That section defines tribal cultural resources to include cultural landscapes.

- B. Integrate Listening Session themes into the project description and alternatives analysis. These themes include the preference for reduced Northern Riverfront development. They also include the importance of unimpeded access for cultural practices. Habitat restoration as cultural stewardship must also be reflected.
- C. Analyze cumulative impacts to Tribal Cultural Resources in a meaningful way. This needs to include impacts from increased development intensity. Changes in public access patterns must be evaluated. Ground disturbance from infrastructure improvements must be considered. Noise and light intrusion on culturally significant areas also warrants analysis.
- D. Engage all Wintu-affiliated groups and other culturally affiliated tribal communities throughout the process. Consultation should not be limited solely to federally recognized entities. The Listening Session record demonstrates broad traditional knowledge among multiple groups. Several non-federally-recognized Wintu groups hold direct cultural knowledge of plan area sites. These groups have participated actively in the RRSP planning process. Limiting consultation would fail to capture the breadth of documented traditional knowledge. This inclusive approach is consistent with General Plan policies NR9A and NR9G–NR9I. It also aligns with General Plan Environmental Justice policies EJ1C and EJ1G.
- E. Establish a Tribal Stewardship Framework as a programmatic mitigation measure. This Framework must provide for ongoing tribal participation in plan implementation and include tribal review of future tiered projects. Habitat restoration planning must involve tribal partners. Management of culturally significant areas must be collaborative. Tribal consultation cannot be treated as a one-time procedural step at the program level.

Trust is built through codification of commitments in enforceable policy, not consultation alone. The Program EIR is the appropriate vehicle to embed that structure. It must endure beyond any single Council, staff configuration, or political cycle.

4. Analyze Conservation Easements and Permanent Protection Mechanisms

The Riverfront's defining environmental features are irreplaceable. These include the riparian corridor, floodplain, seasonal wetlands, and special-status species habitat. Salmon, bald eagles, and neotropical migratory birds depend on these resources. The General Plan Natural Resources Element (Policies NR4D, NR5A–NR5C) emphasizes preservation and restoration. The Parks and Recreation Element (Policies R2A–R2G) emphasizes land acquisition for permanent protection. RRSP Vision Element A calls for restoring sensitive natural communities

(A.2). It requires low-or-no-impact development near critical habitat (A.4). It supports "re-wilding" of the Riverfront area (A.6).

Despite this strong policy direction, the NOP omits conservation easements from the EIR scope. It does not mention deed restrictions or other permanent protection mechanisms. That is a significant gap. Without durable legal protections, open space designations on the Vision Elements and Guiding Principles Framework Diagram remain vulnerable. Future amendment, rezoning, or incremental encroachment could erode them.

The Program EIR must analyze permanent protection as a central strategy, not an optional mitigation tool:

- A. Identify specific areas within the Northern Riverfront as priority candidates for permanent conservation easements. At a minimum, areas designated "Open Space and Habitat Restoration" on Figure 3 would obviously qualify. Easements must be held by a qualified third-party land trust or public agency. California Civil Code Sections 815–816 provide the governing legal framework.
- B. Evaluate extending conservation protections to Civic and Cultural and Active Recreation zones. Tools may include deed restrictions, open space dedications, or overlay zoning. These tools would limit future conversion to more intensive uses.
- C. Evaluate conservation easements as a component of a reduced-development alternative. This analysis falls under CEQA Guidelines Section 15126.6. It must demonstrate how permanent protection reduces significant impacts to multiple resource areas. Biological resources, tribal cultural resources, hydrology, and aesthetics must all be evaluated. The alternative must still achieve core project objectives.
- D. Analyze defined building envelopes within Civic and Cultural and Visitor Hospitality Core zones. All areas outside those envelopes ought to receive permanent open space or conservation protections. This approach concentrates allowable development in a defined footprint. It is consistent with Guiding Principle D.4. It provides permanent certainty for both development and conservation interests.

Conservation easements provide clarity, stability, and long-term environmental benefit. They reduce future land use conflicts. They eliminate incremental pressure for expansion. They provide the durable, objective constraints essential to a Program EIR intended to guide decades of development.

5. Sequence Infrastructure Before Intensity

The NOP identifies "New Secondary Access Options" as a Northern Riverfront "refined concept" element. The Transportation and Utilities sections of the EIR scope confirm circulation, emergency access, and infrastructure capacity will be evaluated. However, the NOP establishes

no framework for sequencing infrastructure before development. Critical safety improvements must precede increases in development intensity and event capacity. This sequencing requirement is not merely a planning preference, it is essential to conformance with the Public Safety Element of the General Plan 2045. Goal PS11 directs the City to plan for orderly evacuation during emergencies and disasters. Without infrastructure sequencing thresholds, the Program EIR cannot demonstrate consistency with that directive.

The Program EIR must:

- A. Model emergency evacuation under maximum buildout and peak event scenarios. This needs to include simultaneous multi-venue events. The Rodeo Arena, Civic Auditorium, and any new venues must be modeled together.
- B. Analyze environmental impacts of potential secondary access improvements. This includes alignments that may extend beyond the Specific Plan boundary. Impacts must be disclosed at the program level even if specific alignments are undetermined. CEQA requires analysis of the whole of the action. (See CEQA Guidelines § 15378(a)).
- C. State explicitly that secondary access improvements outside the Specific Plan boundary require separate review. Such improvements must not rely solely on tiering from this Program EIR.
- D. Establish infrastructure sequencing thresholds as programmatic mitigation measures. These thresholds should specify that defined increases in intensity shall not be approved prematurely. Approval for increased intensity must be withheld until identified infrastructure improvements are completed or fully funded. Required improvements include secondary access, utility capacity upgrades, and stormwater management. Thresholds must be expressed as objective, quantified triggers. For example: "No certificate of occupancy for development exceeding [X] square feet shall be issued. This restriction applies until secondary access improvements meeting [specified] standards are fully funded or operational."
- E. Analyze infrastructure capacity of existing sanitary sewer, water supply, and stormwater systems. This analysis must evaluate capacity at full buildout. It needs to identify deficiencies that must be remedied before development proceeds. The Utilities analysis must be integrated with Land Use and Transportation analyses. Infrastructure adequacy must be evaluated holistically.

Infrastructure sequencing is not merely an operational consideration. It is an environmental one. Development intensity that outpaces infrastructure capacity creates significant impacts. These include impacts to public services, hydrology/water quality, and transportation – all of which are CEQA Environmental Factors that must be analyzed. Embedding sequencing triggers in the Program EIR ensures responsible, phased growth. It

prevents infrastructure deficits that become arguments for additional unplanned development during the 20+ year lifespan of the Riverfront Specific Plan.

In conclusion, the Redding Riverfront Specific Plan represents a generational opportunity. It can translate a widely supported community vision into objective, enforceable standards. These standards must endure beyond any single Council, economic cycle, or political moment.

The Program EIR must be precise in its development assumptions. It needs to be rigorous in analyzing alternatives and permanent protection mechanisms. It must be inclusive in its engagement with the Indigenous community. It needs to be clear in establishing limits within which future projects must operate. Achieving these objectives will strengthen the City's legal position. It will protect irreplaceable natural and cultural resources. **It will provide future decision-makers with a well-defined framework, not an open-ended invitation to reinterpret.**

I appreciate the professionalism of City staff and the MIG-led consultant team. I recognize the complexity of balancing competing interests over a 380-acre, multi-decade planning horizon. My comments support a Specific Plan and Program EIR that are clear, durable, and faithful. They must honor both the RRSP Vision Elements and Guiding Principles and the General Plan 2045.

Thank you for considering these comments. I respectfully request that this letter be included in the administrative record for the RRSP Program EIR.

Respectfully submitted,

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