





Dear Director Pagan,

I appreciate the work that the City of Redding staff and consultant team have already put into the public process of creating an update to the Redding Riverfront Specific Plan (RRSP). Given that the last RRSP was in the 90s, I imagine this has been a huge lift. As a citizen, I want to say thank you.

The Council-determined **Vision Framework Element B** calls for **Respecting the Indigenous Community: Past, Present, and Future**. To demonstrate the aforementioned respect, it's key that City staff and EIR consultants ground themselves in the history of the place:

“...the Indigenous People of the region suffered greatly from violent displacement, epidemics of foreign diseases as well as State and Federal policies of extermination and removal...Wintu descendents still reside in the area today.”
-City of Redding General Plan 2045 (page 10 https://www.cityofredding.gov/government/departments/development_services/general_plan.php)

My public comment focuses on what the EIR analysis must do to deliver on what is promised in the Notice of Preparation (NOP):

“All components of the RRSP, including regulations and funding mechanisms, must be consistent with the Vision Elements and Guiding Principles.”

-page 5 of the COR RRSP NOP: https://www.reddingriverfront.org/files/managed/Document/169/RRSP%20EIR%20NOP_20260130.pdf)

For some reason, the NOP includes reference to the Vision Elements, but omits the Elements themselves, so I have taken the liberty of attaching Element B to this email (source: City of Redding website https://www.reddingriverfront.org/files/managed/Document/154/RRSP_Council%20Meeting_Emerging%20Riverfront%20Concepts_05202025_FINAL_.pdf), and ask that it be included in the administrative record for the RRSP Program EIR.

1. Given that the **Council's Vision Framework Vision Element B1** calls for honoring the deep Indigenous cultural connections to the Redding Riverfront Area, the EIR: a) must analyze impacts to salmon, native plants, animals, water quality, and flooding, recognizing these as cultural keystone species and systems b) must analyze *cumulative impacts* to areas identified during the [January 2024 Tribal Listening Session](#) as sacred, sensitive, or ceremonial. Relying on the July 2024 Archaeological Resources Review Report by Basin Research Associates (San Leandro, CA) and its analysis of only two impacts (CUL 1 and CUL 2) is insufficient. c) must analyze whether the development intensity outlined in the Vision Framework Diagram is compatible with the acknowledged Indigenous cultural significance of the Riverfront.
2. Given that the **Council's Vision Framework Element B2** outlines the need to “engage the Indigenous community and including them in land use, habitat protection, recreation, and cultural landscapes discussions & decisions” the EIR: a) must analyze opportunities for co-stewardship or co-management of open space lands within the Specific Plan area b) must analyze how traditional ecological knowledge will inform habitat restoration and land management within the Specific Plan area.
3. Given that the **Council's Vision Framework Vision Element B3** calls for the City to “protect Indigenous sacred sites and cultural resources,” the EIR: a) must analyze indirect and cumulative impacts to burial sites and culturally sensitive areas, including areas adjacent to but outside of the Specific Plan boundary b) must analyze avoidance-based mitigation strategies rather than reliance solely on monitoring or data recovery.
4. Given that the **Council's Vision Framework Vision Element B4** calls for the City to “maintain Indigenous connections and access to land, river, and animals,” the EIR must analyze how public access design can accommodate Indigenous use without surveillance or privatization of culturally important areas.
5. Given that the **Council's Vision Framework Vision Element B5** calls for the City to “explore opportunities and partnerships for creating Indigenous-owned and -operated cultural centers and spaces, the EIR must analyze this option as it relates to environmental impacts. This analysis a) needs to conform with General Plan NR9H– “Explore appropriate opportunities to support tribe access to and co-management of open space lands under City ownership or control, including acquisition of designated surplus open space lands for natural resource protection purposes.” In any such explorations, the City b) must resource General Plan 2045 Policy EJ1H: “explore options to increase cultural competence and equip City of Redding staff for more culturally relevant engagement.” Vision Element B5 must engage both recognized and unrecognized tribes.
6. The EIR analysis must be consistent with the **City of Redding General Plan 2045, Natural Resources Element, page 14** which states: “Due to the presence of the Sacramento River and its numerous tributary creeks, the Redding Planning Area has a relatively high potential for cultural resources. **The river, creeks, and old river terraces are prime locations for cultural resource sites, both prehistoric and historic.**” Therefore, the EIR a) must not rely only on surface surveys to dismiss cultural impacts, and must analyze the Riverfront as an Indigenous cultural landscape, not just individual archeological sites. The EIR b) must acknowledge that past disturbance or lack of visible artifacts does not mean cultural or burial sites are absent, especially along the Sacramento River.

I am not Indigenous to this place, and I obviously do not speak for Indigenous people. That said, as a member of the **City of Redding General Plan 2045 focus group on Community Health, Wellness, and Environmental Justice**, I request that these comments be included in the administrative record for the RRSP Program EIR.



VISION ELEMENT B
RESPECTING THE INDIGENOUS COMMUNITY
PAST, PRESENT, AND FUTURE



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B1 Honor the deep Indigenous cultural connections to the Redding watershed area.

B2 Engage the Indigenous community and traditional Councils in all decision-making and cultural landscapes discussions and decisions.

B3 Protect Indigenous sacred sites and culture resources.

B4 Maintain Indigenous connections and ancestral ties and stories.

B5 Ensure responsibilities and obligations for shared Indigenous stories and cultural landscapes are honored.

Endorsement

RRSP Vision Framework Element B.png
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