



Protecting Water, Forests and Wildlife

Battle Creek Alliance **Defiance Canyon Raptor Rescue**

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Shasta County Board of Supervisors
1450 Court St.
Redding, CA 96001

Reject the proposed gun range on Dersch Rd./Millville Plains

I hold State and Federal permits to perform raptor rescue and rehabilitation. I've cared for hundreds of raptors and thousands of song birds over the past 10 years. I've lived in Shasta County for 34 years and have traveled Dersch Road frequently for that time, so am extremely cognizant of the species that live in the open and riparian areas there. The whole Millville Plains area is relatively undisturbed by human sources and provides some of the least fragmented habitat in the area. That makes it especially important that the area is not impacted by significant adverse effects in the form of noise, more traffic, and the many other disturbances that an influx of hundreds of people using a shooting range will cause in a quiet rural area.

I have received 2 bald eagles, a golden eagle, and an osprey who were injured in that area in the past few years, all within a radius of several miles of the project site. There are many inaccessible places in the vicinity that are likely to have raptor nests. I know of no surveys on the private lands, but there is a bald eagle nest near Cow Creek on Dersch and an osprey nest on Parkville near Ash Creek Road. I saw 3 juvenile eagles on Ash Creek Road within a few miles of the project area just a few weeks ago--2 were golden eagles together and the separate third appeared to be a bald eagle. I have seen red-tail and red-shoulder hawks numerous times on Dersch Road near the project area over the years, as well as great horned owls, kestrels and others. There are innumerable numbers of non-raptor species also. All of these species are important to the ecological health and function of the area.

The majority of raptors rehabilitators treat are injured by vehicles. National organizations put the figure as above 60%. That figure is true for us. Most of the birds we see who have impact trauma are irreparable. Increasing the traffic on Dersch Road will only make it more

likely that raptors, who are protected by many state and federal laws, will suffer and die. The noise disturbance from traffic and gunshots will increase their stress level, which weakens their health and can cause their nests/offspring to fail or cause the adults to abandon their nests and territories altogether. Has any survey of existing nests by raptor specialists been conducted for this project?

I have consulted with the US Fish and Wildlife Service recently regarding another project that affects eagles. Their ecologist wrote: "Both bald eagles and golden eagles are also protected under the federal [Migratory Bird Treaty Act](#)... Ground crew activity during (as well as before and after, if necessary) would need to be minimized and kept at a distance from the nest so as to avoid disturbance to the eagles from these activities...Golden eagles appear to be less tolerant of human activity, so we generally recommend a one-mile buffer around golden eagle nests for human activity... As [bald eagle populations continue to grow](#), we foresee breeding eagles and their nests showing up in more locations... Eagle nests are also protected under the Bald and Golden Eagle Protection Act. Nests are protected from destruction at any time...you would need to apply for a permit for eagle nest take. Information on, as well as the application process for, permits for eagle nest take can be found here: https://fwsepermits.servicenowservices.com/fws?id=fws_kb_view&sys_id=4b14a5691b9f10104fa520eae54bcba6"

Environmental Effects and Protections

“Significant effect on the environment” is defined by the California Environmental Quality Act (CEQA) guidelines as “a substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.” (CEQA Guidelines, § 15382.)

Public Resources Codes 21000 to 21001 are also very clear about the need to protect the environment from harm:

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC§ionNum=21000

21000. The Legislature finds and declares as follows:

- (a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
- (b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
- (c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.

(d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.

(e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.

(f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.

(g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

21001. The Legislature further finds and declares that it is the policy of the state to:

(a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.

(b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.

(c) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.

(d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.

(e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

(f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.

(g) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

Conclusion

I urge you to uphold the intent of the Public Resource Codes and CEQA regulations in order to protect the environment for all of the residents of the area. Reject the proposal that will only be of value to some hundreds of people and vote in favor of protecting the majority of lives and preserving an important area.

A handwritten signature in black ink that reads "Marilyn Woodhouse". The signature is written in a cursive style with a large, prominent initial "M".

Marilyn Woodhouse, Director

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Fiscal Sponsor: SOL Communications EIN 95-4648687