

SHUTE MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

WINTER KING
Attorney
King@smwlaw.com

April 14, 2022

Via Electronic Mail Only

Ms. Kristen Schreder, Mayor
City of Redding
777 Cypress Avenue
Third Floor
Redding, CA 96001
E-Mail: kschreder@cityofredding.org

Re: Redding Civic Auditorium & Rodeo Grounds

Dear Mayor Schreder and Members of the City Council:

We represent Wintu Audubon, Sierra Club Shasta Group, and Shasta Environmental Alliance with regard to the potential sale for future redevelopment of the Civic Auditorium and the Redding Rodeo Grounds and adjacent open space areas. As you are aware, the Civic Auditorium and Redding Rodeo Grounds (“Project Site”) lie immediately adjacent to extensive riparian lands with extremely high biological resource values, including the Turtle Bay Exploration Park open space area, the Turtle Bay Bird Sanctuary, and riparian resources extending from the Sundial Bridge upstream and beyond the Posse Grounds boat ramp, all areas with significant natural resource and public recreational values.

Given these resources, the City must undertake environmental review *before* taking the discretionary action of designating the Project Site as “surplus property”—a designation that will result in development on the site and associated significant environmental impacts. CEQA Guidelines, California Code of Regulations, title 14, §15002(i) and §15357; see generally *The Flanders Foundation v. City Of Carmel-By-The-Sea*, (2012) 202 Cal.App.4th 603 (EIR prepared prior to City deciding whether to sell property with historic resource). Moving forward with the “surplus property” designation without any analysis of potential environmental impacts would violate the California Environmental Quality Act, Public Resources Code § 21000 et seq. (“CEQA”). It would also be inconsistent with numerous General Plan policies prioritizing preservation and restoration of the area.

I. Introduction

Changes in the scope, intensity, timing and character of land uses at the Project Site would impact—visually, auditorily, and biologically—the approximately 200 acres of the Turtle Bay Exploration Park, the Turtle Bay Bird Sanctuary, and riparian lands extending from the Sundial Bridge upstream to and beyond the boat ramp, and including portions of the Sacramento River Trail designated as a National Recreation Trail by the U.S. National Park Service. These open space and riparian areas provide habitat for wildlife on land and in the river. They provide scenic views, public trails, pedestrian-bike river crossings, fishing and boating access, and a wide corridor of habitat that supports a variety of wildlife, including many special status species. See Appendix 1, Special Status Species of the Turtle Bay Bird Sanctuary, Exploration Park, and Adjacent Riparian Areas; and Redding General Plan, Parks, Trails and Open Space Master Plan, Open Space Strategy at p. 4.

The City’s General Plan and the Open Space Strategy of the Parks, Trails and Open Space Master Plan (OS Master Plan) prioritize preservation of the Sacramento River and adjacent open space and describe it as “the focal point of the community and the organizing element of the park and trail system.” Redding General Plan, Parks, Trails and Open Space Master Plan, Open Space Strategy at p. 4. “Establishing public open space areas along the River and its tributary streams provides outdoor recreation and the potential to restore wildlife habitats, create effective storm water management, and preserve scenic views.” *Id.* “The presence of the River in the Redding region is very important to this area’s quality of life and natural ecosystems, and to the region’s tourism economy.” *Id.* at 15.

The City’s Parks, Trails and Open Space Master Plan, Open Space Suitability Analysis, Maps section shows that the riparian and natural resource areas adjacent the Project Site are identified as “Open Space Interest Areas.” *Id.* at p.7. “Proximity to the river, its streams, and other bodies of water is one of the twelve criteria used in determining what types of land would make appropriate open space. The remaining criteria address other General Plan Goals, including conserving the habitats of sensitive and endangered species....” *Id.* at 4.

Given the natural and biological resources and community value of the areas adjacent to the Project Site, conveying the Project Site to a commercial developer would impose development stresses and impacts on those resources inconsistent with the City’s General Plan. The irreplaceable resources of the riverine and riparian corridor

immediately adjacent to the Project Site, call for their long-term preservation as open space resources, consistent with the vision set forth in the City’s General Plan and Open Space Plan. The City can, and should, consider alternatives to designating the Project Site as “surplus property” and selling it to private developers. For example, the City should consider master planning the Project Site itself, so that crucial environmental studies can properly inform the appropriate CEQA analysis and natural resources can be preserved.¹ This approach would avoid a land sale that could result in the foreclosure of options for protection of important and irreplaceable public resources while ensuring the City’s control over the master planning process.

II. The City’s Potential Decision to Designate the Project Site as Surplus Property Is a Discretionary Decision Under CEQA.

The CEQA Guidelines define a project as the whole of an action, which has potential for resulting in a physical change in the environment, *directly or ultimately...* CEQA Guidelines § 15378; emphasis added. In general, CEQA requires public agencies to identify the potential environmental impacts of a project, as well as mitigation measures and project alternatives, before approving it. “Project” is defined as “an activity which [1] may cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment” and [2] is either undertaken by a public agency or requires agency approval. Guidelines § 15378(a). If a project could have significant, adverse impacts, the agency must prepare an “environmental impact report” or “EIR.” The purpose of conducting this environmental review is to provide the public and decision-makers with information about the project’s environmental effects and ways to minimize them.

CEQA requires that environmental review take place “as early as feasible in the planning process to enable environmental considerations to influence project program and design (and yet late enough to provide meaningful information for environmental assessment).” CEQA Guidelines § 15004(b). For public projects, “CEQA compliance should be completed prior to acquisition of a site.” CEQA Guidelines § 15004(b)(1). Public agencies “shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance....” Guidelines § 15004(b)(2). Nor may lead agencies “piecemeal” a project, i.e., break up the project into smaller pieces and limit environmental analysis to the first piece. See *Laurel Heights Improvement Assn. v.*

¹ To our knowledge, there have been no recent professionally prepared biological surveys of the riparian habitat on-site and in immediately adjacent areas.

Regents of University of California (1988) 47 Cal.3d 376, 396 (improper to “submerge[environmental impacts] by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences”); *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713 (residential project description inadequate because it failed to include necessary sewer expansion); *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214 (project improperly segmented where lead agency treated development and access road as two separate projects); *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307 (deferring environmental analysis until after project approval leads to post-hoc rationalization in violation of CEQA). Further, agencies shall not “otherwise take *any action* which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.” Guidelines § 15004(b)(2)(B); emphasis added; see also *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116 (finding that lead agency violated CEQA by not conducting environmental review prior to entering a conditional agreement to transfer property to a developer as well as providing a loan to the developer for a public-private project).

Therefore, if the City contemplates designation of the proposed Project Site as “surplus property” knowing that the intensity, frequency or scope of uses on the site might foreseeably be greater in the future, then the City must analyze the impacts related to development of that use in an environmental impact report (“EIR”). See, *The Flanders Foundation v. City Of Carmel–By–The–Sea*, (2012) 202 Cal.App.4th 603 (considering the adequacy of an EIR prepared to analyze the potential environmental impacts of the possible uses that a potential purchaser under the Surplus Land Act might make of the property).

Here, the Council’s potential decision to designate the Project Site as “surplus property” is the first step in facilitating the sale, and the foreseeable development, of the property. Moreover, the proposal presented to the City by the development company ‘Populous’ indicates that the development concept would be a massive, dense, urban-scale development with the potential to include a sports arena, a convention center, and entertainment venues. See Populous Proposal dated August 19, 2021. As discussed below, these foreseeable uses would result in significant impacts that must be evaluated prior to the City’s designation of the Project Site as “surplus.”

III. Development of the Proposed Project Site Would Result in Significant Impacts.

Development of the proposed Project Site, particularly following the vision and concept submitted by Populous, would result in foreseeable significant impacts. For example, increases in urban and commercial use intensity, including more frequent large events, would result in significant increases in light/glare and noise, which, in turn, would result in significant impacts to wildlife in the adjacent riparian areas and through the entire riverine corridor. The degradation of these wildlife values would also reduce scenic values from open space areas and trails. The Project Site's location along the river also makes it likely that new development there could significantly impact buried cultural, tribal and /or archaeological resources.

Development that draws large numbers of people (e.g. venues such as new or expanded convention centers or sports arenas) would result in increased air pollution and greenhouse gas emissions due to additional car traffic and congestion. As envisioned by the Populous proposal, these new levels of visitation may be at all times of day or night, on most or even all days of the week, whereas currently activity levels are typically very low after dark, particularly when activities at the auditorium or rodeo grounds are not scheduled. This change in use intensity and frequency will bring new impact sources and more light, glare and noise to the riverine corridor. However, irrespective of the scope of the various scenarios suggested by the Populous proposal, it is important to recognize that ANY increase in the frequency, intensity or scope of land uses on the Project Site has the potential for significant adverse impacts on the riparian resources, due to their immediate proximity, their sensitivity, and their high public and biological values.

Although the riparian areas appear to be excluded from parcels proposed to be declared surplus (as shown on maps of the parcels in question provided on-line and in City Council meetings), their exclusion from the proposed land sale would not preclude impacts to them. Impacts to the riparian habitat are likely because an adequately sized and positioned no-disturbance buffer zone has not been assured. In order to adequately buffer against the impacts on the riparian resources of development and land use changes at the Project Site, such a no-disturbance buffer zone may need to be wider than site conditions even allow, resulting in impacts that could remain significant even after mitigation. The California Department of Fish and Wildlife, conservation organizations and other agencies have long-established that a no-disturbance buffer zone is essential to prevent riparian impacts. Public improvements such as roads, improved trails and other hardscape are known to negate the benefit of spatial setbacks. See, Development, Land Use, and Climate Change Impacts on Wetland and Riparian Habitats *California*

Department of Fish and Wildlife, Northern Region, May, 2014, at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=163508>. Therefore, the City should undertake further study to determine the need and necessary size of such protected buffers.

Last but not least, selling the Project Site for development of more intensive commercial or institutional urban uses would be incompatible with the City's Vision to preserve riverside open space for the ecological values and the benefits provided to the community. See, e.g., Redding General Plan, Parks, Trails and Open Space Master Plan, Open Space Strategy at p. 4. Increased development intensity would be inconsistent with multiple General Plan policies intended to protect the City's open space resources, particularly when part of the Sacramento River Corridor. See, e.g., CDD3B, CDD3C, CDD4B, Goal CDD4.

Specifically, the following General Plan policies mandate preservation of natural areas along the river:

- Policy CDD3B: Require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands in accordance with the Natural Resources Element.
- Policy CDD3C: Preserve natural corridors and linkages between habitat types through project design, key open-space acquisitions, floodplain and slope dedications and easements, conservation easements, and similar mechanisms.
- GOAL CDD4: Protect And Enhance The Relationship Between The City And The Sacramento River.
- Policy CDD4B: Continue acquisition of key lands along the river and the other area waterways to provide passive, nonmotorized public access and to preserve important ecological values and sensitive habitats. This may be accomplished by a combination of public and private land purchases, donations, dedications, granting of public easements, the use of life estates, and similar mechanisms.
- GOAL NR9: Promote And Facilitate Habitat Preservation, Restoration, And Enhancement.

Policy NR9A: Encourage the acquisition, preservation, restoration, and enhancement of native vegetation with a focus on wetlands and riparian habitat that will improve the biological value and integrity of the City's natural resources. Encourage native landscape in unvegetated, manmade areas, such as along streets and in abandoned lots. These General Plan policies also demonstrate that these public lands continue to be necessary for the City's use, and thus the City cannot make the findings required to designate them as "surplus." See Government Code § 54221(b)(1). For example, pursuant to Policy NR9A, the access road along the east edge of the Rodeo Grounds adjacent to the river could be restored as a no-disturbance riparian buffer zone to provide and protect the existing high quality river corridor habitat adjacent to it, for the greater public benefit. Many other sections of the parcels proposed for surplus designation include, or are adjacent to, high quality river corridor habitat and could be restored per Policy NR9A. Declaring these areas surplus is thus inconsistent with Policy NR9A.

We understand the City Attorney has advised that CEQA review would be premature, because it is not certain what precisely would be developed at this time. But here the City has an actual proposal in hand. Thus, implementation of that proposal, or one with similarly extensive and new impacts on the resources above cited, is reasonably foreseeable. The City cannot "piecemeal" environmental review of the sale and subsequent development given the record before it, nor can it defer analysis of the reasonably foreseeable development that will occur if the land is sold.

Moreover, the lack of a specific development proposal did not prevent the City of Carmel-by-the-Sea from preparing an EIR before deciding whether to sell public land with a historic resource on it. See generally *The Flanders Foundation v. City Of Carmel-By-The-Sea*, (2012) 202 Cal.App.4th 603. Indeed, Carmel had even less certainty about what would be developed than Redding does here. Nonetheless, because selling the property would have the reasonably foreseeable effect of impacting the historic resource there, the City prepared an EIR. *Id.* Likewise here, selling the property for more intensive development would necessarily have significant impacts on a variety of sensitive resources, as described above.

IV. The City's Potential Decision to Designate the Project Site as Surplus Property Does Not Qualify For An Exemption From CEQA Review.

Nor would the City decision to designate the Project site as surplus property qualify for an exemption from CEQA review. The draft resolution for this proposed

designation claims this action is exempt under the “common sense” exemption.² Not so. Pursuant to CEQA Guidelines section 15061, this common sense exemption can only be used if “it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.” CEQA Guidelines § 15061. Here, as described above, overwhelming evidence in the record demonstrates that the designation of the land as surplus, and ultimate sale of the property, will have significant, adverse, environmental impacts. *Rominger v County of Colusa* (2014) 229 CA4th 690, overruled in part on other grounds by *Union of Med. Marijuana Patients, Inc. v City of San Diego* (2019) 7 C5th 1171 (holding that the common sense exemption could not be applied to the approval of a subdivision map, which by definition anticipates some future development).

Moreover, under CEQA, “a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to *unusual circumstances*.” CEQA Guidelines § 15300.2(c) Exceptions; emphasis added. In this case, there are several ‘unusual circumstances’ within the meaning of CEQA Guidelines § 15300.2(c) that would apply. For example, as explained in Section III above, the site’s location within and adjacent to the Sacramento River corridor is cited as deserving of increased protection by the Redding General Plan. Therefore, the Project site location adjacent to lands identified for preservation constitutes an ‘unusual circumstance’. In another example, the Project site has a rich and unique character with an abundance of natural and biological resources immediately adjacent to the Project site. (see Appendix 1) The riparian areas immediately adjacent to the Project site are recorded as Cornell University eBird Hotspots “Turtle Bay Bird Sanctuary” and “Sundial Bridge”, which have the third and seventeenth highest bird species counts respectively of any area within Shasta County. They are also the highest ranked such Hotspots in Shasta County that are adjacent to each other (see Cornell eBird Hotspots at <https://ebird.org/hotspot/L168182> and <https://ebird.org/hotspot/L937554>). Therefore, the Project site’s unique character and proximity to sensitive biological resources constitute an ‘unusual circumstance’ that precludes exemption from CEQA. As discussed above, foreseeable development of the site with more intensive uses and more frequently occurring events as a result of the surplus property designation would result in

² The CEQA Guidelines also provide an exemption for the *sale* of surplus public property by government agencies. CEQA Guidelines § 15312. However, as the City seems to acknowledge, this exemption is not available for the *designation* of surplus property. See *The Flanders Foundation v. City Of Carmel–By–The–Sea*, (2012) 202 Cal.App.4th 603 (EIR prepared prior to City deciding whether to sell property with historic resource).

Kristen Schreder
April 14, 2022
Page 9

significant impacts to biological, scenic, recreational, and cultural/tribal/archaeological resources. Therefore, this Project would not be exempt from CEQA.

In summary, prior to considering the designation of the Project site as “surplus property” and considering sale of the site for changes in the scope, character or intensity of land uses, the City must analyze the potentially significant environmental impacts of that discretionary action. Proceeding otherwise would violate CEQA.

IV. Conclusion

Wintu Audubon, Sierra Club Shasta Group, and Shasta Environmental Alliance look forward to a continuing dialogue with the City on this issue and will continue to participate fully in the City’s public process for consideration of the proposed project.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Winter King

WK:CB

Attachment: Appendix 1, Special Status Species of the Turtle Bay Bird Sanctuary, Exploration Park, and Adjacent Riparian Areas

cc: Michael Dacquisto, Vice Mayor mdacquisto@cityofredding.org
Mark Mezzano, Mayor Pro Tempore, mmezzano@cityofredding.org
Julie Winter, Council Member, jwinter@cityofredding.org
Erin Resner, Council Member, eresner@cityofredding.org
Barry Tippin, City Manager, btippin@cityofredding.org
Barry DeWalt, City Attorney, bdewalt@cityofredding.org
Wintu Audubon
Sierra Club Shasta Group
Shasta Environmental Alliance
Mike Lynes, California Audubon

Common Name	Scientific Name	Group	Fed Status	Calif Status	MBTA	Other Relevant Status Per CNDDB
dubious pea	<i>Lathyrus sulphureus var. argillaceus</i>	Dicots				CNDDB Element Rank S1S2-Critically Imperiled; CNPS-3
steelhead - Central Valley DPS	<i>Oncorhynchus mykiss irideus</i>	Fish	Threatened			AFS-Threatened
green sturgeon - southern DPS	<i>Acipenser medirostris</i>	Fish	Threatened			AFS-Vulnerable; IUCN-Near Threatened
chinook salmon - Sacramento River winter-run ESU	<i>Oncorhynchus tshawytscha</i>	Fish	Endangered	Endangered		AFS-Endangered
chinook salmon - Central Valley spring-run ESU	<i>Oncorhynchus tshawytscha</i>	Fish	Threatened	Threatened		AFS-Threatened
foothill yellow-legged frog	<i>Rana boylei</i>	Amphibians		Endangered		IUCN-Near Threatened
western pond turtle	<i>Emys marmorata</i>	Reptiles				CDFW-Species of Special Concern; IUCN-Vulnerable
Shasta chaparral	<i>Trilobopsis roperi</i>	Mollusks				CNDDB Element Rank S1-Critically Imperiled
western pearlshell	<i>Margaritifera falcata</i>	Mollusks				CNDDB Element Rank S1S2-Critically Imperiled
kneecap lanx	<i>Lanx patelloides</i>	Mollusks				CNDDB Element Rank S2-Imperiled
silver-haired bat	<i>Lasionycteris noctivagans</i>	Mammals				IUCN-Least Concern; WBWG-Medium Priority
acorn woodpecker	<i>Melanerpes formicivorus</i>	Birds			Yes	
American crow	<i>Corvus brachyrhynchos</i>	Birds			Yes	
American robin	<i>Turdus migratorius</i>	Birds			Yes	
Anna's hummingbird	<i>Calypte anna</i>	Birds			Yes	
ash-throated flycatcher	<i>Myiarchus cinerascens</i>	Birds			Yes	
bald eagle	<i>Haliaeetus leucocephalus</i>	Birds	Delisted	Endangered	Yes	CDFW-Fully Protected; IUCN-Least Concern; USFWS-Bird of Conservation Concern
Bewick's wren	<i>Thryomanes bewickii</i>	Birds			Yes	
black phoebe	<i>Sayornis nigricans</i>	Birds			Yes	
black-headed grosbeak	<i>Pheucticus melanocephalus</i>	Birds			Yes	
Brewer's blackbird	<i>Euphagus cyanocephalus</i>	Birds			Yes	
brown-headed cowbird	<i>Molothrus ater</i>	Birds			Yes	
Bullock's oriole	<i>Icterus bullockii</i>	Birds			Yes	
bushtit	<i>Psaltriparus minimus</i>	Birds			Yes	
California scrub-jay	<i>Aphelocoma californica</i>	Birds			Yes	
California towhee	<i>Melospiza crissalis</i>	Birds			Yes	
Canada goose	<i>Branta canadensis</i>	Birds			Yes	
cliff swallow	<i>Petrochelidon pyrrhonota</i>	Birds			Yes	
common merganser	<i>Mergus merganser</i>	Birds			Yes	
common yellowthroat	<i>Geothlypis trichas</i>	Birds			Yes	
Cooper's hawk	<i>Accipiter cooperii</i>	Birds			Yes	CNDDB Element Rank S4-Apparently Secure, CDFW-Watch List
downy woodpecker	<i>Dryobates pubescens</i>	Birds			Yes	
Eurasian collared-dove	<i>Streptopelia decaocto</i>	Birds			Yes	
great horned owl	<i>Bubo virginianus</i>	Birds			Yes	
green heron	<i>Butorides virescens</i>	Birds			Yes	
house finch	<i>Haemorhous mexicanus</i>	Birds			Yes	
house wren	<i>Troglodytes aedon</i>	Birds			Yes	
kildeer	<i>Charadrius vociferus</i>	Birds			Yes	
Lazuli bunting	<i>Passerina amoena</i>	Birds			Yes	
lesser goldfinch	<i>Spinus psaltria</i>	Birds			Yes	
mallard	<i>Anas platyrhynchos</i>	Birds			Yes	
marsh wren	<i>Cistothorus palustris</i>	Birds			Yes	
mourning dove	<i>Zenaidura macroura</i>	Birds			Yes	
northern flicker	<i>Colaptes auratus</i>	Birds			Yes	
northern mockingbird	<i>Mimus polyglottos</i>	Birds			Yes	
northern rough-winged swallow	<i>Stelgidopteryx serripennis</i>	Birds			Yes	
Nuttall's woodpecker	<i>Dryobates nuttallii</i>	Birds			Yes	
oak titmouse	<i>Baeolophus inornatus</i>	Birds			Yes	
orange-crowned warbler	<i>Leiostyris celata</i>	Birds			Yes	
osprey	<i>Pandion haliaetus</i>	Birds			Yes	CNDDB Element Rank S4-Apparently Secure, CDFW-Watch List

piebilled grebe	<i>Podilymbus podiceps</i>	Birds			Yes	
red-shouldered hawk	<i>Buteo lineatus</i>	Birds			Yes	
spotted sandpiper	<i>Actitis macularius</i>	Birds			Yes	
spotted towhee	<i>Pipilo maculatus</i>	Birds			Yes	
tree swallow	<i>Tachycineta bicolor</i>	Birds			Yes	
western bluebird	<i>Sialia mexicana</i>	Birds			Yes	
western wood-peewee	<i>Contopus sordidulus</i>	Birds			Yes	
white-breasted nuthatch	<i>Sitta carolinensis</i>	Birds			Yes	
wood duck	<i>Aix sponsa</i>	Birds			Yes	
yellow-breasted chat	<i>Icteria virens</i>	Birds			Yes	CNDDDB Element Rank S3-Vulnerable, CDFW-Species of Special Concern
valley elderberry longhorn beetle	<i>Desmocerus californicus dimorphus</i>	Insects	Threatened			
Great Valley Cottonwood Riparian Forest	Great Valley Cottonwood Riparian Forest	Riparian				CNDDDB Element Rank S2.1-Imperiled

KEY: AFS-American Fisheries Society, Calif Status-Calif Endangered Species Act, CNDDDB-California Natural Diversity Database, CNPS-Calif Native Plant Society, CDFW-Calif Department of Fish and Wildlife, Fed Status-Federal Endangered Species Act, IUCN-International Union for Conservation of Nature, MBTA-Protected by Federal Migratory Bird Treaty Act, USFWS-US Fish and Wildlife Service, WBWG-Western Bat Working Group.

SOURCES: CNDDDB-7.5 Min. Redding and Enterprise Quadrangles and 1/2 mi. radius search, accessed Feb. 14, 2022. Species with no habitat within the Turtle Bay area are excluded from the 7.5 min. Quadrangle results. Species protected by the MBTA: Cornell University eBird Hot List for Turtle Bay Bird Sanctuary (<https://ebird.org/hotspot/L168182>) and Sundial Bridge (<https://ebird.org/hotspot/L937554>), verified for breeding activity by eBird Verifier Bob Yutzy and Certified Wildlife Biologist Len Lindstrand.