



DEPARTMENT OF FISH AND WILDLIFE

Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director



February 9, 2026

Taven Kinison Brown, Community Development Director
City of Gonzales
147 Fourth Street
Gonzales, California 93926
(831) 675-5000
TKinisonBrown@ci.gonzales.ca.us

Subject: Puente Del Monte Specific Plan (Project)
Notice of Preparation (NOP)
State Clearinghouse No.: 2020039055

Dear Taven Kinison Brown:

The California Department of Fish and Wildlife (CDFW) received a NOP from the City of Gonzales pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish and Game Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802).

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, activities evaluated in the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish and Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code may be required.

Conserving California's Wildlife Since 1870

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 2

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: Jackson Family Investments

Objective: The Project proposes to adopt a specific plan that incorporates a general plan amendment, annexation, and pre-zoning approvals for an approximately 501-acre development. The Project would ultimately construct 2,492 homes (low to high density) on 311.4 acres (of which 6.6 acres for mixed-uses); 8.5 acres of light industrial (business park) uses; 61.6 acres of agricultural buffers; 54.6 acres of parks/trails; 21.2 acres of public facilities (two elementary schools); and 43.8 acres of circulation improvements. The Project would be developed in seven phases over a currently undetermined period of time.

Location: The Project site is located east of the existing City of Gonzales (city) limits, in Monterey County. The Project is located southwest of the Gabilan Range and is

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 3

adjacent to the proposed Vista Lucia Specific Plan Project. The Project is located within Assessor's Parcel Numbers (APNs): 223-032-011, -012, and -018.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of Gonzales in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the Draft Environmental Impact Report (DEIR) prepared for the Project.

The Project site is within the range of several special-status species, including, but not limited to, the State and federally threatened California tiger salamander - central California Distinct Population Segment (*Ambystoma californiense* pop. 1); the State fully protected white-tailed kite (*Elanus leucurus*); the State candidate western burrowing owl (*Athene cunicularia hypugaea*) and Crotch's bumble bee (*Bombus crotchii*); State species of special concern Townsend's big-eared bat (*Corynorhinus townsendii*), and western mastiff bat (*Eumops perotis californicus*); the State species of special concern and federally threatened California red-legged frog (*Rana draytonii*); and the State species of special concern and federally proposed threatened western spadefoot (*Spea hammondi*).

Additionally, the Project site is within the range of several species of special-status plants, including, but not limited to, the California Rare Plant Rank (CRPR) 1B.1 Congdon's tarplant (*Centromadia parryi* ssp. *Congdonii*).

California Tiger Salamander

The Project site is within the known geographic range of California tiger salamander (CTS), and a historical occurrence was documented ½-mile north of the Project site (CDFW 2026). CTS breed and develop in vernal and seasonal pools and stock ponds in grassland, woodland, and scrub habitat types and have been determined to be physiologically capable of dispersing up to approximately 2-miles from seasonally flooded wetlands (Searcy and Shaffer 2011). Based on aerial imagery, there is sufficient dispersal habitat within the Project site, and potential breeding habitat within the agricultural ponds located within the Project site and Project vicinity and nearby annual grassland habitat located northeast of the Project site.

CTS were observed in 2019 within the adjacent Vista Lucia Project, a similar development project located less than one mile away from the Project boundary. CDFW is aware of the previous discussions between project proponents, the City of Gonzalez, and USFWS regarding CTS hybridization within the vicinity of the Project and provided

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 4

specific comments to the City of Gonzalez clarifying the State status and protections for CTS (and CTS hybrids) within the Vista Lucia Project footprint. As outlined in these comments, CTS and CTS hybrids are still protected under CESA as there are no definitions within Fish and Game Code that exempt or exclude the protection of listed species that might hybridize and/or have the genetic traits of multiple species, subspecies, or varieties. With the knowledge of the species historic and recent occurrences within the Project vicinity, CDFW strongly recommends that the Project proponent consult with CDFW for survey recommendations and approaches to assist with determining whether the Project can avoid take of CTS. If take of CTS cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. CDFW also recommends the following measures be incorporated within the Draft Environmental Impact Report (DEIR) prepared for the Project and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project.

Recommended Mitigation Measure 1: Focused CTS Protocol-level Surveys

CDFW recommends that a qualified biologist conduct protocol-level surveys in accordance with the USFWS "Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander" (USFWS 2003) prior to the initiation of construction for each phase of the Project to determine the existence and extent of CTS breeding and refugia habitat. The protocol-level surveys for CTS require more than one survey season and are dependent upon sufficient rainfall to complete. As a result, consultation with CDFW is recommended well in advance of beginning the surveys and prior to any planned vegetation- or ground-disturbing activities. CDFW advises that the protocol-level survey include a 100-foot buffer around the Project site in all areas of wetland and upland habitat that could support CTS. Please be advised that protocol-level survey results are viable for two years after the results are reviewed by CDFW.

Recommended Mitigation Measure 2: CTS Avoidance Buffer

If CTS protocol-level surveys as described in Recommended Mitigation Measure 1 are not conducted, CDFW advises that a minimum 50-foot no-disturbance buffer be delineated around all small mammal burrows in suitable upland refugia habitat within and/or adjacent to the Project site. Further, CDFW recommends potential or known breeding habitat within and/or adjacent to the Project site be delineated with a minimum 250-foot no-disturbance buffer. Both upland burrow and wetland breeding no-disturbance buffers are intended to minimize impacts to CTS habitat and avoid take of individuals.

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 5

Recommended Mitigation Measure 3: CTS Take Authorization

If through surveys it is determined that CTS are occupying or have the potential to occupy the Project site, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. As stated above, in the absence of protocol surveys, the applicant can assume presence of CTS within the Project site and obtain an ITP from CDFW.

White-Tailed Kite

The Project site is within the known geographic range of white-tailed kite (WTKI) and there are historic occurrences near the proposed Project site (CDFW 2026). WTKI are known to nest and forage within valley foothill riparian, riverine, wetland, grassland and cropland habitats, some of which are within the vicinity of the Project site. As such, CDFW recommends the following measures be incorporated within the DEIR and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 4: WTKI Surveys

CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), CDFW recommends a qualified avian biologist conduct focused surveys for nesting WTKI within the Project site and ½-mile buffer of the Project site prior to the initiation of construction for each phase of the Project.

Recommended Mitigation Measure 5: WTKI Avoidance Buffer

CDFW recommends a minimum no-disturbance buffer of ½-mile be delineated around active nests of WTKI until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. CDFW advises Project proponents not to allow reductions in no-disturbance buffer size for WTKI or any fully protected bird species absent a compelling biological or ecological reason to do so. If a ½-mile no-disturbance buffer is not feasible, further consultation with CDFW is warranted to discuss Project implementation and avoid take.

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 6

Western Burrowing Owl

The California Fish and Game Commission (FGC) approved western burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

The Project site is within the known geographic range of BUOW and there are historical occurrences of the species located approximately ½-mile from the proposed Project site (CDFW 2026). BUOW inhabit open grasslands containing small mammal burrows, a requisite habitat feature used for nesting and covering, and they are known to nest and forage in agricultural lands, particularly along roadways and agricultural canals and ditches. It appears that suitable burrowing and foraging BUOW habitat is present within the Project site. As the Project is within the range of BUOW, the species has been documented within the Project vicinity, and suitable habitat appears to be present, CDFW recommends the following measures be incorporated within the DEIR and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 6: BUOW Pre-construction Surveys

CDFW recommends that focused surveys, following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report) (CDFG 2012), be conducted the survey season immediately prior to the initiation of construction for each phase of the Project. Please note that the 2012 Staff Report necessitates multiple surveys prior to the initiation of construction.

Recommended Mitigation Measure 7: BUOW Avoidance Buffer

Should a BUOW or known BUOW den (active or inactive) be detected, either during pre-construction surveys or construction activities, CDFW recommends that no-disturbance buffers, as outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012), be implemented prior to and during any ground-disturbing activities. CDFW also recommends that these buffers be implemented for both wintering and breeding BUOW.

Recommended Mitigation Measure 8: BUOW Take Authorization

If a BUOW or known BUOW den (active or inactive) is detected, and the no-disturbance buffers outlined in the 2012 Staff Report on Burrowing Mitigation are not feasible, consultation with CDFW is warranted to discuss how to implement the

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 7

Project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Crotch's Bumble bee

The Project site is within the range of Crotch's bumblebee (CBB) and there is a historical occurrence of the species located approximately 5 miles from the proposed Project site (CDFW 2026). CBB are known to inhabit areas of grasslands, scrub habitat, and ruderal vegetation within agricultural settings, if these habitats contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses; these habitat elements may be present within the Project site and immediate Project vicinity. As such, CDFW recommends a qualified biologist conduct a habitat assessment to determine if the Project site and the immediate surrounding vicinity contain habitat suitable to support CBB as part of the technical studies conducted in support of the DEIR. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

If suitable CBB habitat is determined to be present, CDFW recommends the following measures be incorporated within the DEIR and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 9: CBB Surveys

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for CBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023), prior to the initiation of construction for each phase of the Project.

Recommended Mitigation Measure 10: CBB Avoidance

If CBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation within a Project area warrants consultation with CDFW to discuss how to avoid take.

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 8

Recommended Mitigation Measure 11: CBB Take Authorization

If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Special-Status Bats

The Project site is within geographic range of special-status bats, including Townsend's big-eared bat and western mastiff bat (CDFW 2026). Known roosting habitats include bridges, trees, and buildings that provide the required localized climatic conditions and surrounding foraging opportunities needed. In some cases, multiple bat species can co-occur in roosts, and they may have similar life histories. The Project site contains both structures and trees which may support special-status bat roosting. As such, CDFW recommends the following measures be incorporated within the DEIR and implemented within areas of suitable habitat prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 12: Special-Status Bat Surveys

CDFW recommends the project proponent conduct focused surveys to establish species usage and seasonal usage prior to the initiation of construction for each phase of the Project. Focused survey methodology is advised to include visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (guano), and use of ultrasonic detectors (Anabat, Sonobat, etc.) during all dusk emergence and pre-dawn re-entry. To maximize detectability, each survey needs to be conducted within one 24-hour period.

Recommended Mitigation Measure 13: Bat Roost Disturbance Avoidance and Minimization

If bats are present, CDFW recommends that a 100-foot no-disturbance buffer be placed around the roost and installing new roost sites to be in place prior to the initiation of Project related activities to allow enough time for bats to relocate. If a bat roost is identified and work is planned to occur during the breeding season, CDFW recommends that no disturbance to maternity roosts occur and that CDFW be consulted to determine measures to prevent breeding disruption or failure.

California Red-Legged Frog

The Project site is within the geographic range of California red-legged frog (CRLF). CRLF primarily inhabit ponds but can also be found in other waterways including streams and agricultural ponds and ditches. The species will also breed in ephemeral

Taven Kinison Brown, Community Development Director
 City of Gonzales
 February 9, 2026
 Page 9

waters (Thomson et al. 2016). Based on a review of aerial imagery, the aquatic features (i.e., streams, agricultural ditches and ponds) within the Project site and vicinity may support CRLF breeding and/or dispersal. As such, CDFW recommends a qualified biologist conduct a habitat assessment to determine if the Project site and the immediate surrounding vicinity contain habitat suitable to support CRLF breeding or dispersal as part of the technical studies conducted in support of the DEIR. This habitat assessment should incorporate an appropriate buffer around the Project site and determine whether the adjacent streams and onsite aquatic features have the potential to support CRLF breeding and/or dispersal.

If suitable CRLF habitat is determined to be present, CDFW recommends the following measures be incorporated within the DEIR and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 14: CRLF Surveys

CDFW recommends that a qualified biologist conduct focused surveys for CRLF within areas of suitable habitat 48-hours prior to the initiation of construction for each phase of the Project following the “Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog” (USFWS 2005) document to determine if CRLF are within or adjacent to the Project site.

Recommended Mitigation Measure 15: CRLF Avoidance

If any CRLF are found during pre-construction surveys or at any time during construction, CDFW recommends avoidance whenever possible via delineation and observance of a 50-foot no-disturbance buffer around CRLF and their burrows. If CRLF are observed on the Project site, CDFW also recommends that Project activities in the immediate vicinity cease, allowing individuals to leave the Project site on their own accord. Finally, CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for CRLF.

Western Spadefoot

The Project is within the geographic range of western spadefoot (WESP) and there is a historical occurrence of the species located within approximately ½-mile of the Project site. WESP are known to occur within grassland and agricultural habitats and these features are present within the Project site and immediate Project vicinity. and suitable habitat is present within the Project site and Project vicinity. As such, CDFW recommends the following measures be incorporated within the DEIR and implemented

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 10

prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 16: WESP Surveys

CDFW recommends that a qualified biologist conduct focused surveys for WESP, using appropriate survey methodologies, prior to the initiation of construction for each phase of the Project.

Recommended Mitigation Measure 17: WESP Minimization

If WESP burrows, cracks, loose soil areas or other refugia are found to be used by WESP during focused surveys, avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around these resources, including all potential breeding habitat, which can include agricultural sumps and irrigation ditches in addition to any areas that pool water for only a few weeks. Avoidance of potential breeding habitat should occur even when dry, since post-metamorphic WESP juveniles have a unique adaptation to the drying of their temporary breeding pools; they utilize the dried pond bottom as a refuge, burying themselves in the dessication cracks and damp soil beneath the surface crust (Baumberger et al. 2020). If any lifestage of WESP are observed on the Project site, Project activities in their immediate vicinity should cease, allowing individuals to leave the Project site on their own accord.

On September 24, 2025, the California Fish and Game Commission (Commission) received a petition to list the northern population of WESP as threatened species and the southern population of WESP as an endangered species under CESA. If the Commission takes action and WESP becomes listed as a Candidate for listing pursuant to CESA (possible in 2026), or ultimately becomes listed as threatened or endangered pursuant to CESA, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), is necessary to comply with CESA if full avoidance of WESP could not be achieved. Please note that implementation of the above recommended measures would help minimize impacts to WESP as required by CEQA but would not fully avoid impacts and thus take; additional measures would need to be implemented to avoid take of WESP. In the event that WESP becomes protected under CESA, CDFW recommends early consultation to help identify if avoidance is feasible or if not, to initiate discussions regarding the need for ITP acquisition.

Special-status Plants

The Project is within the range of several special status plant species, and the Project site and immediate vicinity may contain sufficient habitat to support Congdon's tarplant.

Taven Kinison Brown, Community Development Director
 City of Gonzales
 February 9, 2026
 Page 11

As such, CDFW recommends the following measures be incorporated within the DEIR and implemented prior to the initiation of Project ground disturbance associated with each phase of the Project:

Recommended Mitigation Measure 18: Special-Status Plant Focused Surveys

CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities” (CDFW 2018) immediately prior to initiation of Project activities within a Project area. CDFW recommends these surveys be specifically timed to look for Congdon’s tarplant, which is known to occur in disturbed and compacted soils and habitats. This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

Recommended Mitigation Measure 19: Special-Status Plant Avoidance

CDFW recommends special-status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

Recommended Mitigation Measure 20: Special-Status Plant Take Authorization

If a State-listed plant species are identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would need to occur through issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b), or Fish and Game Code section 1900 and California Code of Regulations, title 14, section 786.9, subdivision (b).

EDITORIAL NOTES AND SUGGESTIONS

Cumulative Impacts: CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). Cumulative

Taven Kinison Brown, Community Development Director
 City of Gonzales
 February 9, 2026
 Page 12

impacts are recommended to be analyzed using an acceptable methodology to evaluate the impacts of this Project's incremental contribution to habitat loss and past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should also be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff are available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Lake and Streambed Alteration: Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Nesting birds: CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities,

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 13

CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Artificial Lighting

Installation of outdoor artificial night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication, determining when to begin foraging, thermoregulation behavior, and migration (Longcore and Rich 2004, Miller 2006, Nightingale et al. 2006, Perry et al. 2008, Stone et al. 2009). Phototaxis, a phenomenon which results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004). Project activities could result in disruption of wildlife behavior, inadvertent injury, or mortality.

CDFW recommends that the DEIR for the Project include an analysis of the impacts of artificial lighting on biological resources and incorporate enforceable mitigation measures to decrease the impacts of artificial outdoor lighting on wildlife species. Potentially feasible mitigation measures include motion sensitive lighting; mounting light fixtures as low as possible to minimize light trespass; use of light fittings that direct and confine the spread of light downward; and use of long-wavelength light sources. In addition, CDFW recommends that lighting not be installed in ecologically sensitive areas (e.g., streams, wetlands, and habitat used by special status species, such as nesting/roosting sites and riparian corridors) and the use of the white/blue wavelengths of the light spectrum be avoided.

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 14

CNDDDB

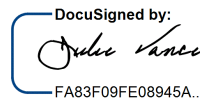
Please note that the California Natural Diversity Database (CNDDDB) is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB, but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDDB does not mean a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special status species are present at or near the Project site.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City of Gonzales in identifying and mitigating this Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). Please see the enclosed, Attachment 1, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Evelyn Barajas-Perez, Environmental Scientist, at (805) 503-5738 or evelyn.barajas-perez@wildlife.ca.gov.

Sincerely,


FA83F09FE08945A...
Julie A. Vance
Regional Manager

Attachments

Attachment 1 - MMRP

cc: State Clearinghouse
Governor's Office of Planning and Research
State.Clearinghouse@opr.ca.gov

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 15

REFERENCES

- Baumberger, K., A. Backlin, E. Gallegos, C. Hitchcock, and R. Fisher. 2020. Mitigation ponds offer drought resiliency for western spadefoot (*Spea hammondi*) populations. Southern California Academy of Sciences, 119(1), pp. 6-17.
- California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2018. Protocols for surveying and evaluating impacts to special status native plant populations and sensitive natural communities. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act (CESA) candidate bumble bee species. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2026. Biogeographic information and observation system. <<https://www.wildlife.ca.gov/Data/BIOS>>. Accessed January 24, 2026.
- Longcore, T. and C. Rich. 2004. Ecological light pollution - Review. *Frontiers in Ecology and the Environment*, 2:191–198.
- Miller, M. 2006. Apparent effects of light pollution on singing behavior of American robins. *The Condor*, 108:130–139.
- Nightingale, B., T. Longcore, and C. Simenstad. 2006. Artificial night lighting and fishes. Pages 257–276 in C. Rich and T. Longcore, editors. *Ecological consequences of artificial light at night*. Island Press, Washington, D.C., USA.
- Perry, G., B. Buchanan, R. Fisher, M. Salmon, and S. Wise. 2008. Effects of night lighting on urban reptiles and amphibians. Chapter 16 in: *Urban Herpetology: Ecology, Conservation and Management of Amphibians and Reptiles in Urban and Suburban Environments*. J. C. Mitchell, R. E. Jung Brown and B. Bartholomew (ed.). *Herpetological Conservation*, 3:211-228.
- Searcy, C. and B. Shaffer. 2011. Determining the migration distance of a vagile vernal pool specialist: How much land is required for conservation of California tiger salamanders? California State University, Chico, California, USA.
- Stone, E., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology*, 19:1123–1127.

Taven Kinison Brown, Community Development Director
City of Gonzales
February 9, 2026
Page 16

Thomson, R., A. Wright, and B. Shaffer. 2016. California amphibian and reptile species of special concern. California Department of Fish and Wildlife. Oakland, California, USA.

U. S. Fish and Wildlife Service 2003. Interim guidance on site assessment and field surveys for determining presence or a negative finding of the California tiger salamander. Sacramento, California, USA.

U.S. Fish and Wildlife Services. 2005. Revised guidance on site assessment and field surveys for the California red-legged frog. Sacramento, California, USA.

Zeiner, D., W. Laudenslayer, Jr., K. Mayer, and M. White. 1990. California's Wildlife. Volumes I-III *in* California Department of Fish and Game, editor. California Department of Fish and Wildlife, Sacramento, California, USA.