



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
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**GAVIN NEWSOM, Governor**  
**VALERIE TERMINI, Acting Director**



January 22, 2026  
*Sent via email.*

Keith Gardner  
Community Development Director, City of Twentynine Palms  
6136 Adobe Road  
Twentynine Palms, CA 92277  
Email: [kgardner@29palms.org](mailto:kgardner@29palms.org)

Dear Keith Gardner:

E-Group PS Solar Project (PROJECT)  
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
SCH# 2024021042

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Twentynine Palms (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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, we appreciate 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 the 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 & G. 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.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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 will be required.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** E-Group PS Solar

**Objective:** The DEIR’s stated objectives of the Project are to: 1. Maintain a range of potential housing units consistent with the City’s General Plan; 2. Expand the amount of utility-scale renewable energy available to the City and region and reduce local and state dependence on fossil fuels; 3. Provide the City with a community benefits package which increases City revenue; 4. Assist the City in achieving its General Plan goals of reducing its carbon footprint and supporting sustainable sources of electricity; and 5. Develop a project which limits the impact on the land by allowing renaturalization of the property once the project’s operations have ended. The DEIR describes the project as a commercial solar photovoltaic facility spanning approximately 241 acres of an approximately 477 acre area.

**Location:** The Project is located at the northwest corner of Two Mile Road and Noels Knoll Road (extended), in the northwest portion of the City, at latitude 34.160903 longitude -116.117361. The site consists of 477 acres of currently undeveloped property on Assessor’s Parcel Numbers 0612-201-01 (approximately 317 acres) and 0612-201-05 (approximately 160 acres). The site is bordered by Two Mile Road to the south and unimproved future City streets including Amboy Road to the north, Canyon Road to the west, and Noels Knoll Road on the east.

**Timeframe:** The Project is proposed to begin construction in 2026 and be completed over a nine-month time period.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations presented in **Attachment A** to assist the City 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 in **Attachment A** to improve the document.

### **COMMENT #1: Alternatives Analysis to Meet Stated Project Objectives**

#### **DEIR, Pages ES-4, 1-4**

**Issue:** Extensive Project site grading will result in potentially significant impacts to hydrology and biological resources.

**Specific Impact:** The DEIR does not identify and analyze reasonable alternatives that would meet all stated Project objectives while also minimizing potentially significant Project impacts to hydrology and biological resources associated with grading.

**Why impact would occur:** The DEIR states that one of the Project's objectives is to "d[D]evelop a project which limits the impact on the land by allowing renaturalization of the property once the project's operations have ended." (DEIR, p. ES-4) As proposed, the current project does not fully meet the DEIR's stated Project objectives and requires extensive grading of approximately 140 acres of land with approximately 264,000 cubic yards of cut and fill. Presently, the DEIR identifies three project alternatives: Alternative 1, No Project/Construction; Alternative 2 No Project/Existing General Plan; and Alternative 3, Reduced Project Intensity.

An EIR need not examine all possible alternatives; rather the necessary analysis is guided by the 'rule of reason' and whether an alternative exists that feasibly meets project objectives.<sup>2</sup> The DEIR does not identify an alternative that includes a terrain-following solar panel arrangement that would allow for greater ability for the solar facility to utilize the existing terrain, thereby reducing both the grading necessary to fulfill the remaining Project objectives and associated impacts to hydrology and biological resources.

**Evidence impact would be significant:** Traditional construction methods for solar fields require extensive grading to uniformly level the construction site. Terrain-following solar arrangements better conform with existing terrain, often reduce project grading costs, minimize habitat disturbance, facilitate habitat recovery, minimize changes in hydrology, and potentially reduce erosion issues.

**Recommended Potentially Feasible Mitigation Measure(s) to reduce impacts to less than significant:** The DEIR should include and analyze a Project alternative incorporating terrain-following construction methods that meet Project objectives while minimizing Project related impacts. Grading of the Project site should be optimized to meet Project objectives, reduce potentially significant impacts to biological resources and their habitats, reduce soil disturbances, and changes in hydrology.

## **COMMENT #2: Revegetation**

### **DEIR, Section 2.5, Page 11, and Section 2.8, p. 2.8-17**

**Issue:** Unenforceable mitigation measures related to renaturalization/revegetation.

**Specific Impact:** The DEIR discusses the "renaturalization" and "revegetation" of the disturbed project areas without defining specific and enforceable mitigation measures with achievable success criteria.

**Why impact would occur:** MM-BIO-1 of the DEIR suggests that the project site would be allowed to "re-naturalize" as a mitigation measure without defining what re-naturalize means in the context of the DEIR. Per CEQA Guidelines 15126.4, mitigation measures should be specific and enforceable so that the DEIR can adequately analyze, disclose, and mitigate significant project impacts.

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<sup>2</sup> 2008, California Supreme Court. Bay Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal. 4<sup>th</sup> 1143.

**Evidence impact would be significant:** Although the DEIR does not explicitly define the objectives for facilitating the 're-naturalization' of the site, it can be reasonably inferred by the reader that the intent is to revegetate native habitats as evidenced in BIO-1 which states "...suitable habitat for special-status species (i.e., all undeveloped land or re-naturalized land within the project site) with potential to occur in the project..." and, "[I]n order to reduce the severity of these impacts, mitigation measures AES-1 and AES-2 have been developed, which would allow for the restoration of the native plant environment surrounding the solar panels to the extent possible." (DEIR p. 4-2) Additionally, DEIR section 2.8 states that "o[n]ce operational, the Solar Project will be revegetated (see Section 2.5, Biological Resources), and storm flows will sheet flow across the site and in existing drainage channels. The revegetation will mimic the current native condition and control erosion from storm water across the site." (DEIR, p. 2.8-17) However, the DEIR does not analyze the post-Project site's ability to support revegetation efforts (e.g., re-naturalize) given the extensive changes in topography associated with project grading rendering the mitigation measure potentially unenforceable and perhaps unachievable. Furthermore, the DEIR does not define re-naturalization or revegetation, nor does it identify success criteria associated with these concepts.

The grading of approximately 140 acres will significantly alter the drainage patterns, soil distribution, natural sediment and nutrient transport processes, and may result in project-related soil compaction, reduced localized biodiversity, and the permanent loss or alteration of complex micro terrain, microhabitats. These impacts may individually and collectively influence the success or failure of revegetation attempts.

**Recommended Potentially Feasible Mitigation Measure(s) to reduce impacts to less than significant:** Alternative construction methods exist that allow greater conformity with existing terrain (see comment above). These technologies may significantly reduce the Project's grading needs. The DEIR should minimize grading; where grading cannot be avoided, the DEIR should include specific and enforceable performance objectives related to re-naturalization/revegetation (e.g., percent native cover, percent non-native cover, minimum diversity criteria, cessation of supplemental watering, etc.) and require a habitat restoration plan for City and CDFW approval.

Plans for re-naturalization and revegetation (restoration) should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in advance of Project impacts in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate.

**COMMENT #3: Desert kit fox (*Vulpes macrotis*)**

**DEIR, Section 2.5, Page 2.5-40**

**Issue:** The Project site is located within the range of desert kit fox (*Vulpes macrotis*).

**Specific issue:** Potential take of desert kit fox.

**Why impact would occur:** CDFW is concerned that the DEIR's mitigation measure BIO-4 does not provide sufficient specificity to ensure minimize and avoid impacts to desert kit fox.

**Evidence impact would be significant:** The desert kit fox is a species of special concern and is protected from take by CDFW Code 14 CCR section 460.

**Recommended potentially feasible mitigation measure(s) to reduce impacts to less than significant:** CDFW recommends that surveys be conducted for all areas proposed to be directly or indirectly affected by the Project to determine the presence or absence of this species and the number of desert kit fox that may be present.

CDFW recommends mitigation measure be BIO-4 revised to reference survey methods that include procedures used to classify identified dens as inactive dens, active and potentially active dens, and active natal dens, and methods to quantify and locate single or paired animals. The measures should also include detailed monitoring requirements and methods of exclusion/passive relocation to be conducted, and methods and timing of den excavation.

CDFW recommends Mitigation Measure BIO-4 be revised as follows:

**BIO-4:**

A pre-construction survey for Desert Kit Fox shall be conducted ~~for~~ by a **Qualified Biologist familiar with desert kit fox** within 10 days before initiation of site preparation or grading activities to determine the presence/absence of Desert Kit Fox. **The Qualified Biologist shall conduct a pre-project survey to attain 100% visual coverage within the Project area and a minimum 500-foot buffer to determine the presence or absence of desert kit fox individuals, dens, and sign. The project proponent shall provide the results of the survey to CDFW prior to start of Project activities. The**

**survey report should identify the status of all identified dens, include an estimate of occupancy, and detail the methodology utilized to support these conclusions.**

**If potential dens are located, they shall be monitored by the Qualified Biologist. Trail cameras may be used to assist with observation but shall not be the sole basis upon which the status is determined. Permittee shall provide a determination if active dens can be avoided and buffered from Project activities to prevent take and disturbance with the survey results.**

**Should active Desert Kit Fox dens be present within the Project area that cannot be avoided with an adequate buffer, a Desert Kit Fox Relocation and Mitigation Plan shall be prepared by a qualified biologist in consultation with CDFW, and shall be implemented including protective measures such as the establishment of no disturbance buffer zones for active den and active natal den. No disturbance or relocation of active dens may take place when juveniles may be present and dependent on parental care. Permittee shall block off inactive dens within the buffer zone with rocks and sticks to discourage use during Project activities and remove when construction is complete. The Qualified Biologist shall periodically check the inactive burrows remain blocked and are not reoccupied During Project activities including construction and decommissioning.**

A report to evaluate the success of the relocation efforts and any subsequent re-occupation, if applicable, shall be provided at the end of the construction period. Data shall be readily available to the CDFW upon request. If an injured, sick, or dead desert kit fox is detected on any area associated with the project, the designated CDFW personnel at both the Ontario office and the Wildlife Investigation Lab shall be notified as described within the Desert Kit Fox Relocation and Mitigation Plan.

#### **COMMENT #4: Stream Resources**

##### **DEIR, Section 2.5, Page 2.5-47**

**Issue:** The project will impact ephemeral stream resources.

**Specific issue:** The DEIR does not specify that the Project proponent is required to obtain a streambed alteration agreement for Project-related impacts to stream resources.

CDFW remains concerned regarding the EIR's and Jurisdictional Delineation's characterization of streams, underestimating the number and extent of Project-related impacts to streams and hydrology. CDFW will continue to work with the Project proponent to identify, analyze, avoid, minimize, and mitigate project-related impacts to ephemeral stream resources through the streambed alteration agreement process.

**Why impact would occur:** CDFW is concerned that the DEIR's mitigation measure BIO-8 does not specifically commit the Project proponent to obtaining a streambed alteration agreement for Project impacts to stream resources.

**Evidence impact would be significant:** Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that results in one or more of the following: substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your Project that would eliminate or reduce harmful impacts to fish and wildlife resources.

CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources.

**Recommended potentially feasible mitigation measure(s) to reduce impacts to less than significant.** CDFW recommends Mitigation Measure BIO-4 be revised as follows:

**BIO-8:**

**Avoidance and Minimization of Impacts to Potential Jurisdictional**

**Aquatic Resources.** Prior to ground disturbing activities permittee shall obtain a streambed alteration agreement for all Project impacts to resources subject to Fish and Game Code section 1602. The following avoidance and minimization measures would be implemented when ground-disturbing activities occur within 25 feet of waters of the state and/or jurisdictional streambeds (i.e., jurisdictional aquatic resources):

- All jurisdictional aquatic resources within 25 feet of project activities shall be fenced or flagged as environmentally sensitive areas prior to any ground disturbance.
- A biological monitor shall be present during construction activities within 25 feet of jurisdictional aquatic resources to ensure avoidance.
- Best Management Practices shall be implemented to avoid indirect impacts to jurisdictional waters, including:
  - Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional aquatic resources or be placed in locations that may be subjected to high storm flows.

- Spoil sites shall not be located within jurisdictional aquatic resources or in locations that may be subject to high storm flows, where spoils might be washed into drainages.
- Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous, resulting from project-related activities, shall be prevented from entering jurisdictional aquatic resources.
- Equipment maintenance shall occur outside jurisdictional aquatic resources and in such a manner that no petroleum products or other pollutants from the equipment enters on- or off-site state-jurisdictional aquatic resources either directly or indirectly.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## **ENVIRONMENTAL DOCUMENT FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

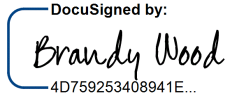
## **CONCLUSION**

CDFW appreciates the opportunity to comment on the DEIR to assist The City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Eric Weiss, Senior Environmental Scientist at (909) 844-2769 or [Eric.Weiss@wildlife.ca.gov](mailto:Eric.Weiss@wildlife.ca.gov).

Keith Gardner  
City of Twentynine Palms  
January 22, 2026  
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Sincerely,

DocuSigned by:  
  
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Brandy Wood  
Environmental Program Manager

Attachments

Mitigation Monitoring and Reporting Program (MMRP) for CDFW-Proposed  
Mitigation Measures

ec: **California Department of Fish and Wildlife**  
[R6CEQA@wildlife.ca.gov](mailto:R6CEQA@wildlife.ca.gov)

**Office of Planning and Research, State Clearinghouse, Sacramento**  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PURPOSE OF THE MMRP

The purpose of the MMRP is to ensure the compliance with mitigation measures during project implementation. Mitigation measures must be implemented within the time periods indicated in the table below.

TABLE OF MITIGATION MEASURES

The following items are identified for each mitigation measure: Mitigation Measure, Implementation Schedule, and Responsible Party. The Mitigation Measure column summarizes the mitigation requirement. The Implementation Schedule column shows the date or phase when each mitigation measure will be implemented. The Responsible Party column identifies the person or agency that is primarily responsible for implementing the mitigation measures.

| Biological (BIO) Mitigation Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Implementation Schedule                                                | Responsible Party        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|--------------------------|
| <p>Mitigation Measure BIO-4: A pre-construction survey for Desert Kit Fox shall be conducted by a Qualified Biologist familiar with desert kit fox within 10 days before initiation of site preparation or grading activities to determine the presence/absence of Desert Kit Fox. The Qualified Biologist shall conduct a pre-project survey to attain 100% visual coverage within the Project area and a minimum 500-foot buffer to determine the presence or absence of desert kit fox individuals, dens, and sign. The project proponent shall provide the results of the survey to CDFW prior to start of Project activities. The survey report should identify the status of all identified dens, include an estimate of occupancy, and detail the methodology utilized to support these conclusions.</p> <p>If potential dens are located, they shall be monitored by the Qualified Biologist. Trail cameras may be used to assist with observation but shall not be the sole basis upon which the status is determined. Permittee shall provide a determination if active dens can be avoided and buffered from Project activities to prevent take and disturbance with the survey results.</p> <p>Should active Desert Kit Fox dens be present within the Project area that cannot be avoided with an adequate buffer, a Desert Kit Fox <del>Relocation and Mitigation</del> Plan shall be prepared by a Qualified Biologist in consultation with CDFW, and shall be implemented including protective measures such as the establishment of no disturbance buffer zones for active den and active natal den. No disturbance or relocation of active dens may take place</p> | <p>Prior to commencing ground- or vegetation-disturbing activities</p> | <p>Project Proponent</p> |

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| <p>when juveniles may be present and dependent on parental care. Permittee shall block off inactive dens within the buffer zone with rocks and sticks to discourage use during Project activities and remove when construction is complete. The Qualified Biologist shall periodically check the inactive burrows remain blocked and are not reoccupied During Project activities including construction and decommissioning.</p> <p>A report to evaluate the success of the relocation efforts and any subsequent re-occupation, if applicable, shall be provided at the end of the construction period. Data shall be readily available to the CDFW upon request. If an injured, sick, or dead desert kit fox is detected on any area associated with the project, the designated CDFW personnel at both the Ontario office and the Wildlife Investigation Lab shall be notified as described within the Desert Kit Fox Relocation and Mitigation Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                             |                          |
| <p>Mitigation Measure BIO-8: Prior to ground disturbing activities permittee shall obtain a streambed alteration agreement for all Project impacts to resources subject to Fish and Game Code section 1602. The following avoidance and minimization measures would be implemented when ground-disturbing activities occur within 25 feet of waters of the state and/or jurisdictional streambeds (i.e., jurisdictional aquatic resources):</p> <ul style="list-style-type: none"><li>• All jurisdictional aquatic resources within 25 feet of project activities shall be fenced or flagged as environmentally sensitive areas prior to any ground disturbance.</li><li>• A biological monitor shall be present during construction activities within 25 feet of jurisdictional aquatic resources to ensure avoidance.</li><li>• Best Management Practices shall be implemented to avoid indirect impacts to jurisdictional waters, including:<ul style="list-style-type: none"><li>- Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional aquatic resources or be placed in locations that may be subjected to high storm flows.</li><li>- Spoil sites shall not be located within jurisdictional aquatic resources or in locations that may be subject to high storm flows, where spoils might be washed into drainages.</li></ul></li></ul> | <p>Prior to ground- or vegetation-disturbing activities</p> | <p>Project Proponent</p> |

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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| <ul style="list-style-type: none"><li>- Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous, resulting from project-related activities, shall be prevented from entering jurisdictional aquatic resources.</li><li>- Equipment maintenance shall occur outside jurisdictional aquatic resources and in such a manner that no petroleum products or other pollutants from the equipment enters on- or off-site state-jurisdictional aquatic resources either directly or indirectly.</li></ul> |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|