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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
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November 3, 2026

Samuel Bumgardner-Kranz, Senior Engineer
Sonoma County
404 Aviation Boulevard
Santa Rosa, CA 95403
Samuel.Baumgardner-Kranz@sonomacounty.gov

Subject: Chalk Hill Road Bridge Replacement Project, Draft Environmental Impact Report, SCH No. 2025040225, Sonoma County

Dear Samuel Bumgardner-Kranz:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from Sonoma County for the Chalk Hill Road Bridge Replacement Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

CDFW is submitting comments on the draft EIR to inform Sonoma County, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake or Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Sonoma County

Objective: The Project includes construction of a new two-lane single-span concrete box girder bridge, supported by reinforced concrete abutments, fully spanning Maacama

[1] 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.

Docusign Envelope ID: 06713296-0C19-81D6-82E4-D36505330ED5

Creek. The Project also includes removal of the existing one-lane substandard bridge. The replacement bridge would be constructed on an alternate alignment, located downstream (west) of the existing bridge. Additionally, scour countermeasures, such as vegetated rock slope protection and large logs with root wads, would be installed to stabilize the south creek bank and to protect the new replacement bridge. The existing bridge would be removed following completion of the new bridge. The Project would be constructed in two construction seasons. The replacement bridge would be built and put into service during the first construction season. The existing bridge would remain open during the first construction season to maintain traffic. Once the new bridge is completed, traffic would be switched onto the new bridge. Demolition of the existing bridge and installation of permanent scour countermeasures would occur during the second construction season. The Project includes dewatering and diversion of Maacama Creek during both construction seasons. The Project also includes tree removal and impacts to riparian vegetation.

Location: The Project is located along Chalk Hill Road where it crosses Maacama Creek, in an unincorporated area of the County of Sonoma, approximately 1.35 miles south of intersection of Chalk Hill Road and State Route 128, at approximately Latitude 38.622081°, Longitude -122.773733°.

REGULATORY REQUIREMENTS

California Endangered Species Act (CESA)

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. **The Project has the potential to impact coho salmon (*Oncorhynchus kisutch*), CESA listed as endangered, as further described below.** Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065.). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

Docusign Envelope ID: 06713296-0C19-81D6-82E4-D36505330ED5

Lake and Streambed Alteration Agreement

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. **The Project would impact Maacama Creek, therefore an LSA Notification would be required as indicated in the draft EIR and further described below.** CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Sonoma County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources, which are also included in **Attachment 1 Draft Mitigation and Monitoring Reporting Plan**.

I. MANDATORY FINDINGS OF SIGNIFICANCE: Does the Project have the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

And,

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or Unites States Fish and Wildlife Service (USFWS)?

COMMENT 1: Coho Salmon, Mitigation Measure Related Impact Shortcoming

Issue, specific impacts, why they may occur and be potentially significant: Thank you for including Mitigation Measure (MM) BIO-5 in the draft EIR to protect special-status fish, however it does not adequately mitigate potential impacts to coho salmon because a CESA ITP is not required and is often necessary to ensure impacts are mitigated to less-than-significant. Maacama Creek and downstream Russian River are federally designated critical habitat for coho salmon. The draft EIR concludes that coho salmon may occur at the Project sites and direct impacts to the species would occur from dewatering and fish capture and

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relocation. Therefore, it appears that work would occur in the creek and dewatering would be implemented which is anticipated to directly impact coho salmon. Coho salmon is listed as endangered under CESA and the federal Endangered Species Act (ESA) and therefore is considered to be an endangered species pursuant to CEQA Guidelines section 15380. Therefore, if coho salmon would be impacted by the Project and a CESA ITP is not obtained, the Project could result in a substantial reduction in the species' population, which would be a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: To reduce impacts to coho salmon to less-than-significant and comply with CESA and ESA, CDFW recommends that the draft EIR include the below mitigation measure in addition to MM BIO-5:

Mitigation Measure MM BIO-8 (Coho Salmon Protection): If dewatering activities or any other activities that may result in take of coho salmon will occur, the Project shall obtain an incidental take permit (ITP from CDFW prior to commencing Project activities and shall comply with the ITP including but not limited to providing habitat restoration or compensation. The Project shall also consult with the U.S. Fish and Wildlife Service or National Marine Fisheries Service (NMFS) for any impacts to federally listed fish species.

II. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?

COMMENT 2: Lake and Streambed Act Notification, Mitigation Measure Related Impact Shortcoming

Issue, specific impacts, why they may occur and be potentially significant: Thank you for including MM BIO-6 to protect perennial stream biological communities in the draft EIR, however it does not adequately mitigate potential impacts to stream and riparian habitat because an LSA Notification and Agreement is not required, which is often necessary to ensure impacts are reduced to less-than-significant. The Project would include dewatering activities, riparian habitat and tree removal, and construction related activities within Maacama Creek which would result in temporary and potentially permanent habitat loss. Therefore, the Project could result in a substantial reduction of stream and riparian habitat, which would be a potentially significant impact.

Recommended Mitigation Measure: To reduce impacts to stream and riparian habitat to less-than-significant and comply with Fish and Game Code section 1600 et seq., CDFW recommends including the below mitigation measure in the draft EIR in addition to MM BIO-6.

Docusign Envelope ID: 06713296-0C19-81D6-82E4-D36505330ED5

Mitigation Measure MM BIO-9 (LSA Notification): The Project shall notify CDFW pursuant to Fish and Game Code section 1600 et seq. for Project activities affecting Maacama Creek, and any other streams, or associated riparian habitat, and shall comply with the Lake and Streambed Alteration (LSA) Agreement, if issued. More information on the LSA Notification process is available at https://wildlife.ca.gov/Conservation/Environmental-Review/LSA. The Project shall not commence activities with potential to impact the stream and riparian habitat until the LSA Notification process has been completed. An LSA Agreement, if issued, will likely include: 1) restoration on-site or off-site at a minimum 3:1 restoration to impact ratio to offset permanent impacts, and on-site where temporary impacts occur; and 2) additional avoidance and minimize measures to protect fish and wildlife resources. The Project shall also obtain permits from the Regional Water Quality Control Board (RWQCB) and U.S. Army Corps of Engineers (USACE) pursuant to the Clean Water Act if applicable.

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 (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/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 draft EIR to assist Sonoma County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to James Hansen, Environmental Scientist, at (707) 576-2869 or James.Hansen@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

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Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1. Draft Mitigation and Monitoring Reporting Plan

ec: Office of Land Use and Climate Innovation, State Clearinghouse (SCH No. 2025040225)
Craig Weightman, CDFW Bay Delta Region – Craig.Weightman@wildlife.ca.gov

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ATTACHMENT 1

Draft Mitigation and Monitoring Reporting Plan

Biological Resources (BIO)			
Mitigation Measure	**Description**	**Timing**	**Responsible Party**
BIO-8	*Coho Salmon Protection:* If dewatering activities or any other activities that may result in take of coho salmon will occur, the Project shall obtain an incidental take permit (ITP) from CDFW prior to commencing Project activities and shall comply with the ITP including but not limited to providing habitat restoration or compensation. The Project shall also consult with the USFWS or NMFS for any impacts to federally listed fish species.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant
BIO-9	*LSA Notification:* The Project shall notify CDFW pursuant to Fish and Game Code section 1600 et seq. for Project activities affecting Maacama Creek, and any other streams, or associated riparian habitat, and shall comply with the Lake and Streambed Alteration (LSA) Agreement, if issued. More information on the LSA Notification process is available at https://wildlife.ca.gov/Conservation/Environmental-Review/LSA. The Project shall not commence activities with potential to impact the stream and riparian habitat until the LSA Notification process has been completed. An LSA Agreement, if issued, will likely include: 1) restoration on-site or off-site at a minimum 3:1 restoration to impact ratio to offset permanent impacts, and on-site where temporary impacts occur; and 2) additional avoidance and minimize measures to protect fish and wildlife resources. The Project shall also obtain permits from the RWQCB and USACE pursuant to the Clean Water Act if applicable.	Prior to Ground Disturbance and for Duration of Construction	Project Applicant