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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670-4599
(916) 358-2900
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 22, 2025

Edith Verdin
Senior Regional Planner
San Joaquin Council of Governments
555 East Weber Avenue
Stockton, CA 95202
verdin@sjcog.org

Subject: 2026 San Joaquin Council of Governments Reginal Transportation Plan & Sustainable Communities Strategy
Notice of Preparation
SCH No. 2025041249

Dear Edith Verdin:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) from San Joaquin Council of Governments for the 2026 San Joaquin Council of Governments (SJCOG) Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS Program) in San Joaquin County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Program that may affect California fish, wildlife, plants and their habitats. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Program that it, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. 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 (Fish & G. Code, § 1802.). Similarly, for purposes

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.

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of CEQA, CDFW provides, 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 may also act 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 phases following the Program's EIR 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 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.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The RTP/SCS Program area is located throughout the County of San Joaquin and includes all of the following cities: of Escalon, Lathrop, Lodi, Manteca, Ripon, Stockton, Tracy, Mountain House, and all unincorporated areas under the jurisdiction of the County of San Joaquin Capital improvement projects identified in the RTP/SCS Program are primarily located on State Highways: I-5, I-205, I-580, SR99, 120, 33, other county roads, and locally owned streets; Railways: Union Pacific, Burlington Northern and Santa Fe Railway; Waterways: San Joaquin, Mokelumne, and Stanislaus; and Airport: Stockton Metropolitan.

The RTP/SCS Program consists of the SJCOG's development of a comprehensive vision of the region's transportation system. The 2026 RTP/SCS Program will cover the planning period through the year 2050. The 2026 RTP/SCS Program EIR will be prepared as a program-level document that analyzes the effects of proposed actions for all modes of transportation, as well as other issues and concerns such as transportation control measures and demand management, congestion management, and intelligent transportation systems. As a programmatic EIR, it will be prepared at the level of detail necessary to facilitate effective tiering by lead agencies for future transportation and development projects, particularly regarding potential SB 375 streamlining.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the SJCOG in adequately identifying and/or mitigating the RTP/SCS Program's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the RTP/SCS Program with respect to impacts on biological resources. CDFW recommends that the forthcoming EIR incorporate the following policies and objectives in order to minimize impacts to biological resources:

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1. The SJCOG shall promote the preservation and restoration of continuous areas of natural habitat throughout San Joaquin County and support their integration with existing and future preserves;

2. The SJCOG shall retain plant and wildlife habitat areas where there are known sensitive resources (e.g., sensitive habitats, special-status, threatened, and endangered, candidate species, and species of special concern). Particular attention shall be focused on retaining habitat areas that are contiguous with other existing natural areas and/or wildlife movement corridors:

3. The SJCOG shall preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive nonnative plants. If not feasible, adverse impacts on riparian habitat shall be mitigated by the preservation and/or restoration of this habitat in compliance with state and federal regulations in perpetuity;

4. The SJCOG shall preserve and protect aquatic and wetland resources including creeks, streams, marshes, ponds, rivers, lakes and other seasonal wetlands to the extent feasible. If not feasible then mitigation measures shall be required in coordination with the state and federal regulations to protect fish and wildlife resources. Special-status species reliant on wetland habitat that should be considered as applicable to project activities include steelhead (*Oncorhynchus mykiss irideus*), Swainson's hawk (*Buteo swainsoni*), burrowing owl (*Athene cunicularia*), and tricolored blackbird (*Agelaius tricolor*). Additionally, the SJCOG shall require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no net loss of resource value and/or function;

5. The SJCOG shall preserve and protect vernal pools and grasslands that provide habitat for rare and endangered species. If not feasible the mitigation of all adverse impacts on annual grasslands shall comply with the state and federal regulations protecting foraging habitat for those species known to utilize this habitat;

6. The SJCOG shall preserve and protect oak woodlands, heritage oaks, and/or significant stands of oak trees in San Joaquin County that provide habitat for common native, and special-status wildlife species;

7. The SJCOG shall preserve, protect, and avoid impacts to natural, undisturbed habitats that provide movement corridors for sensitive wildlife species. If corridors are adversely affected, damaged habitat shall be replaced with habitat of equivalent value or enhanced to enable the continued movement of species;

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8. The SJCOG shall consider the potential impact on sensitive plants and wildlife for each project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the SJCOG shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either (1) protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry recognized best practices; or (2) suitable habitat and presence of the species shall be assumed to occur within all potential habitat locations identified on the Program area. Survey Reports shall be prepared and submitted to the SJCOG and CDFW and/or the United States Fish and Wildlife Service (depending on the species) for further consultation and development of avoidance and/or mitigation measures consistent with state and federal law;

9. The SJCOG will thoroughly analyze future project's potential direct, indirect and cumulative impacts on biological resources. To ensure these impacts are fully analyzed, the SJCOG will define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The SJCOG shall analyze potential direct impacts from lighting, noise, human activity, and wildlife-human interactions created by development activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages, as well as analyze potential indirect impacts including resources in areas adjacent to the Project footprint, such as nearby public lands, open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands. Additionally, the SJCOG shall analyze a project's cumulative impacts and determine if that contribution would result in a significant impact;

10. The SJCOG shall adopt appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of construction and long-term operation and maintenance of projects. Mitigation will be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355);

11. The SJCOG shall support active habitat restoration and enhancement to reduce impact of climate change stressors and improve overall resilience of habitat within existing parks and open space in San Joaquin County;

12. The SJCOG shall support educational programs for residents and visitors about the uniqueness and value of the natural resources, plants, and wildlife in the

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region, and how to manage development to preserve native wildlife populations, to the extent they are consistent with habitat protection requirements; and

13. The SJCOG shall comply with all applicable laws related to nesting birds and birds of prey. Potential habitat for nesting birds and birds of prey is present throughout San Joaquin County. The SJCOG shall analyze all potential activities that may incur a direct or indirect take to nongame nesting birds within San Joaquin County and provide appropriate avoidance, minimization, and/or mitigation measures to avoid take. Project-specific avoidance and minimization measures may include but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and species-specific buffers, where appropriate. The SJCOG shall also include specific avoidance and minimization measures that will be implemented should a nest be located within a project site. In addition to larger, protocol level survey efforts and scientific assessments, final preconstruction surveys may be required no more than fifteen (15) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

Mitigation Measures for Program Impacts to Biological Resources

1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511 and 4700) have the potential to occur within or adjacent to the Project area, including, but not limited to: golden eagle (*Aquila chrysaetos*), white-tailed kite (*Elanus leucurus*), bald eagle (*Haliaeetus leucocephalus*), California condor (*Gymnogyps californianus*), greater sandhill crane (*Antigone canadensis tabida*), California black rail (*Laterallus jamaicensis coturniculus*), northern California ringtail (*Bassariscus astuyus raptor*). CDFW recommends that the San Joaquin County Council of Governments conduct a thorough review of available data and habitat conditions and disclose all fully protected species with the potential to occur within or adjacent to the program area. The EIR should analyze potential adverse impacts to these species, including those related to loss of foraging habitat disruption or migratory or breeding behaviors. The EIR should identify general avoidance, minimization, and mitigation strategies that could be implemented to reduce indirect impacts to fully protected species. This analysis will help ensure future project-level CEQA documents are based on a well-informed and legally adequate programmatic foundation.

2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Program area, including, but not limited to: California red-legged frog (*Rana draytonii*), western spadefoot (*Spea hammondii*), northern harrier (*Circus hudsonius*), fulvous whistling-duck (*Dendrocygna bicolor*), least bittern (*Ixobrychus exilis*), mountain plover (*Charadrius montanus*), common loon (*Gavia immer*), lesser sandhill crane (*Antigone canadensis canadensis*), purple martin (*Progne subis*), tricolored blackbird (*Agelaius tricolor*), yellow-headed blackbird (*Xanthocephalus*

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xanthocephalus), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), black tern (*Chlidonias niger*), saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*), yellow warbler (*Setophaga petechia*), Suisun song sparrow (*Melospiza melodia maxillaris*), song sparrow (Modesto population) (*Melospiza melodia* pop.1), Bryants savannah sparrow (*Passerculus sandwichensis alaudinus*), American white pelican (*Pelecanus erythrorhynchos*), short-eared owl (*Asio flammeus*), burrowing owl (*Athene cunicularia*), green sturgeon – southern DPS (*Acipenser medirostris* pop.1), white sturgeon (*Acipenser transmontanus*), Sacramento perch (*Archoplites interruptus*), riffle sculpin (*Cottus gulosus*), central California roach (*Hesperoleucus symmetricus symmetricus*), Sacramento hitch (*Lavina exilicauda exilicauda*), hardhead (*Mylopharadon conocephalus*), Sacramento splittail (*Pogonichthys macrolepidotus*), Pacific Lamprey (*Entosphenus tridentatus*), western river lamprey (*Lampetra ayresii*), Kern brook lamprey (*Lampetra hubbsi*), steelhead – Central Valley DPS (*Oncorhynchus mykiss irideus* pop. 11), steelhead – central California coast DPS (*Oncorhynchus mykiss irideus* pop.8), chinook salmon – Central Valley fall/late fall-run ESU (*Oncorhynchus tshawytscha* pop.13), riparian woodrat (*Neotoma fuscipes riparia*), western mastiff bat (*Eumops perotis californicus*), American badger (*Taxidea taxus*), pallid bat (*Antrozous pallidus*), Townsends big-eared bat (*Corynorhinus townsendii*), western red bat (*Lasiurus frantzii*), Northern California legless lizard (*Anniella pulchra*), California glossy snake (*Arizona elegans occidentalis*), San Joaquin coachwhip (*Masticophis flagellum ruddocki*), northwestern pond turtle (*Actinemys marmorata*), coast horned lizard (*Phrynosoma blainvillii*). CDFW recommends that the EIR disclose all possible SSC that may be present in the program area and broadly analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the San Joaquin Council of Governments include in the analysis, general avoidance, minimization and mitigation measures that could be implemented to reduce impacts to SSC.

3. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The Manual of California Vegetation* (Sawyer 2009). The EIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

4. *Nesting Birds:* Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16

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U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that is it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Potential habitat for nesting birds and birds of prey is present within the program area. At the assessment level, the EIR should disclose the likelihood of nesting habitat occurring within the program area and identify general seasonal constraints associated with avian breeding activity, typically from February 1 through August 31, depending on the bird species with the potential to occur in the area, and local conditions. General avoidance, minimization, and/or mitigation measures to avoid take shall be included in the EIR which may include:

- Conducting pre-construction nesting bird surveys by a qualified biologist within appropriate buffer distances for all phases of construction. Timelines and nesting bird survey distances shall be decided upon based on the risk of impacts to potential nesting bird species that shall be identified for smaller scale projects to follow.

- Establishing protective species-specific buffers around active nests with distances based on activity type and intensity, as well as nest stage and location.

- Restricting ground disturbance or vegetation removal to outside of avian breeding and nesting time (approximately February 1 – August 31).

The EIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the EIR should be made a condition of approval of the RTS/SCS Program.

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California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if future Project activities have the potential to result in "take" (Fish & G. Code § 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: candidate threatened species: white sturgeon (*Acipenser transmontanus*); threatened species: California tiger salamander – central California DPS (*Ambystoma californiense* pop.1), California tiger salamander – Santa Barbara County DPS (*Ambystoma californiense* pop.2), Swainson's hawk (*Buteo swainsoni*), greater sandhill crane (*Antigone canadensis tabida*), bank swallow (*Riparia riparia*), tricolored blackbird (*Agelaius tricolor*), California black rail (*Laterallus jamaicensis coturniculus*), longfin smelt (*Spirinchus thaleichthys*), longfin smelt – San Francisco Bay-Delta DPS (*Spirinchus thaleichthys*), chinook salmon – Central Valley spring-run ESU (*Oncorhynchus tshawytscha* pop. 11), San Joaquin kit fox (*Vulpes macrotis mutica*), Alameda whipsnake (*Masticophis lateralis euryxanthus*), giant gartersnake (*Thamnophis gigas*); candidate endangered species: burrowing owl (*Athene cunicularia*), Crochs bumble bee (*Bombus crotchii*), western bumble bee (*Bombus occidentalis*); and endangered species: foothill yellow-legged frog – central coast DPS (*Rana boylii* pop.4), foothill yellow-legged frog – south Sierra DPS (*Rana boylii* pop.5), bald eagle (*Haliaeetus leucocephalus*), California condor (*Gymnogyps californianus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), little willow flycatcher (*Empidonax traillii brewsteri*), least Bell's vireo (*Vireo bellii pusillus*), Delta smelt (*Hypomesus transpacificus*), chinook salmon – Sacramento River winter-run ESU (*Oncorhynchus tshawytscha* pop. 7), riparian brush rabbit (*Sylvilagus bachmani riparius*), Delta button-celery (*Eryngium racemosum*), large-flowered fiddleneck (*Amsinckia grandiflora*), succulent owls-clover (*Castilleja campestris* var. succulenta), Boggs Lake hedge-hyssop (*Gratiola heterosepala*).

CDFW recommends that the EIR disclose a list of the potentially occurring State-listed species within the Program area, based on review of available data and habitat conditions. The EIR should identify potential impact so State-listed species in the plan area and develop general Avoidance and Minimization Measures to reduce impacts to State-listed species with a likelihood of being in the Program area. Future CEQA documents must address the level of risk level of take occurring to the list of State-listed species identified as being potentially present within the Program area and the San Joaquin Council of Governments shall demonstrate compliance with CESA on a project-by-project basis.

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Native Plant Protection Act

The Native Plant Protection Act (Fish & G. Code §1900 *et seq*.) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

Based on the review of Program materials, maps, and aerial photography, the Program area supports several streams and associated riparian habitat. CDFW recommends the EIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

The EIR should identify all watercourses where activities are planned to occur and are likely to be impacted by prospective project documents which will be tiered from the RPT/SCS's EIR. If future CEQA documents describe project activities which may result in significant impacts to these resources the EIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do 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 where it may 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 and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

San Joaquin County Multi-Species Habitat Conservation & Open Space Plan

The Program is located within the Plan Area of the San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP). The SJMSCP allows Permittees (SJCOG Inc., San Joaquin County and cities of Escalon, Lathrop, Lodi, Manteca, Ripon,

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Stockton and Tracy) to issue Incidental Take Permits or allows project applicants to mitigate for impacts to SJMSCP Covered Species resulting from covered projects.

CEQA Guidelines section 15125(d) states that EIRs must discuss any inconsistencies between projects and applicable plans (including habitat conservation plans/natural community conservation plans). CDFW recommends the EIR include a discussion of the Project's consistency with the SJMSCP and how the SJCOG will ensure that implementation of the Project does not impede the SJMSC's ability to meet its biological goals and objectives. All information and forms needed to initiate the coverage process under the Plan can be found at: Document Center • San Joaquin Council of Governments, CA • C.

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 CNDDB. The CNNDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be submitted online or mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the SJCOG and serve to help defray the cost of environmental review by CDFW. Payment of the 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

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the Notice of Preparation of the EIR for the 2026 San Joaquin Council of Governments Regional Transportation Plan & Sustainable Communities Strategy and recommends that the SJCOG address CDFW's comments and concerns in the forthcoming EIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

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If you have any questions regarding the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Hailey Donaldson, Environmental Scientist at (916) 216-6253 or hailey.donaldson@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Tanya Sheya
1ABC45303752499...

Tanya Sheya
Environmental Program Manager

ec: Dylan Wood, Senior Environmental Scientist (Supervisory)
Hailey Donaldson, Environmental Scientist
Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

REFERENCES

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. (2009). *A Manual of California Vegetation, 2nd ed*. California Native Plant Society Press. Sacramento, California. http://vegetation.cnps.org/