



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
wildlife.ca.gov

March 3, 2026

Victoria Lombardo, Senior Planner
City of Tracy
333 Civic Center Plaza
Tracy, CA 95376
Victoria.Lombardo@cityoftracy.org

Subject: Paradise Pointe Business Park Project, Draft Environmental Impact Report, SCH No. 2025050796, San Joaquin County

Dear Victoria Lombardo:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from the City of Tracy for the Paradise Pointe Business Park Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously submitted comments in response to the Notice of Preparation of the draft EIR.

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 (LSA) 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.

REGULATORY AUTHORITY

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction

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.

Victoria Lombardo, Senior Planner
City of Tracy
March 3, 2026
Page 2

or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86). CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any Project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and 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 a CESA permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, does not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION SUMMARY

Proponent: Michael Diepenbrock, Ridge Tracy Land Partners No. 2, LLC

Objective: The objective of the Project is to develop two warehouse buildings totaling 718,165 square feet, including supportive parking and landscaping. Primary Project activities include excavation of contaminated soil in an approximately 10.2-acre Remediation Area prior to development; grading of the Project site; construction of two industrial warehouses, associated utilities, parking, and an outdoor amenity area for employees; and installation landscaping, including native and drought tolerant plants and associated irrigation systems.

Location: The Project site is located in the City of Tracy, San Joaquin County. The site is located at the northwest corner of Chrisman Road and Paradise Avenue adjacent to State Route 205 (SR-205) to the north, and the approximate Project coordinates are Latitude 37.763333°, Longitude -121.392694°.

Timeframe: A timeframe is not specified for the initiation of Project activities.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Tracy 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 document.

I. Mitigation Measure or Alternative and Related Impact Shortcoming

COMMENT 1: Special-Status Species Surveys

In a response letter to the Notice of Preparation of the draft EIR dated June 10, 2025, CDFW recommended that surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Several threatened or endangered,

Victoria Lombardo, Senior Planner
 City of Tracy
 March 3, 2026
 Page 3

candidate, and other special-status species that are known to occur, or have the potential to occur, in or near the Project site. Species identified in CDFW's response letter included:

- Crotch's bumble bee (*Bombus crotchii*), candidate for listing under CESA;
- Song sparrow – Modesto population (*Melospiza melodia* pop. 1), state Species of Special Concern;
- Swainson's hawk (*Buteo swainsoni*), listed threatened under CESA;
- Tricolored blackbird (*Agelaius tricolor*), listed threatened under CESA; and
- Western burrowing owl (*Athene cunicularia*), candidate for listing under CESA.

The draft EIR relies upon the Initial Study to conclude that Project impacts related to Biological Resources are less-than-significant and does not incorporate CDFW's previous recommendations for special-status species surveys (page 1.0-5). If special-status species have the potential to be impacted by Project activities but remain undetected prior to initiation of Project construction, impacts may still be potentially significant.

Recommendation 1: To help identify nesting birds that may be impacted by Project activities, including special-status species for which no recommended survey protocols are available, CDFW recommends that the following mitigation measure is included as a condition of approval in the final EIR:

Nesting Bird Surveys and Avoidance: *If Project activities will occur during nesting bird season (February 1 to September 15), a qualified biologist shall conduct one focused survey for active nests, including those of ground-nesting birds, within seven days prior to the initiation of project-related activities. If a lapse in Project-related activities of seven days or longer occurs, another focused survey will be required before project activities can be reinitiated. Surveys shall be conducted in all potential habitat located at project work sites and in staging and storage areas. The minimum survey radii surrounding the work area shall be the following: (1) 250 feet for non-raptors; and (2) 1,000 feet for raptors.*

Any active nests shall have an appropriately sized protective buffer to protect the bird's normal bird behavior to prevent nesting failure or abandonment. Typical protective buffers are as follows: i) 1,000 feet for large raptors such as buteos, ii) 500 feet for smaller raptors such as accipiters and iii) 250 feet for passerines. No project personnel or equipment shall be allowed to enter the protective buffer until a qualified biologist determines that the young have fully fledged and will no longer be adversely affected by the project. A qualified biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings, and all active nests should be continuously monitored by a biologist during construction activities to detect any signs of disturbance and behavioral changes as a result of the project. If signs of disturbance and behavioral changes are observed, work shall cease and the protective buffer shall be increased.

Recommendation 2: To help identify special-status species that may be impacted by Project activities for which recommended survey protocols are available, CDFW recommends that the following mitigation measures are incorporated as specific and enforceable mitigation measures in the final EIR:

Crotch's Bumble Bee Habitat Assessment and Surveys: *CDFW recommends a qualified biologist conduct a habitat assessment as part of the biological studies conducted to determine if the Project site and the immediate surrounding vicinity contain habitat suitable to support Crotch's bumble bee. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old*

Victoria Lombardo, Senior Planner
 City of Tracy
 March 3, 2026
 Page 4

bird nests, dead trees, and hollow logs would need to be documented as part of the assessment. If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for Crotch's bumble bee following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW, 2023).

Swainson's Hawk Surveys and Avoidance: If Project activities are scheduled during the nesting season for Swainson's hawks (March 1 to September 15), prior to beginning work on this Project, a qualified biologist shall conduct surveys according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (TAC, 2000). The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. Survey methods should be closely followed by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the Project site or a larger area if needed to identify potentially impacted active nests, and 2) for at least the two survey periods immediately prior to initiating Project-related construction activities. Surveys shall occur annually for the duration of the Project. If active Swainson's hawk nests are detected, the Project shall implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist.

Western Burrowing Owl Surveys: No more than 14 days prior to prior to Project activities, a qualified biologist shall conduct at least two surveys following the methods described in CDFW 2012 Staff Report on Burrowing Owl Mitigation, Appendix D (CDW, 2012), at least seven days apart, with the final survey conducted no more than 48 hours prior to beginning Project activities. Surveys shall encompass the Project site and a sufficient buffer zone to detect owls nearby that may be impacted commensurate with the type of disturbance anticipated, as outlined in the CDFW 2012 Staff Report, and include burrow surrogates such as culverts, piles of concrete or rubble, and other non-natural features, in addition to burrows and mounds. If a lapse in Project-related work of 14 calendar days or longer occurs, additional surveys shall be required. If occupied burrows are detected during surveys, CDFW shall be consulted prior to Project commencement.

COMMENT 2: Take Authorization of California Endangered Species Act-Listed Species

In a response letter to the Notice of Preparation of the draft EIR dated June 10, 2025, CDFW identified several threatened or candidate species that are known to occur, or have the potential to occur, in or near the Project site. Threatened species include tricolored blackbird and Swainson's hawk, and candidate species include western burrowing owl and Crotch's bumble bee.

The Project has the potential to result in direct take of species that utilize burrows, such as Crotch's bumble bee and western burrowing owl, during ground-disturbing activities. The Project also has the potential to result in direct or indirect take of nesting birds, including Swainson's hawk, western burrowing owl, or tricolored blackbird, if noise and visual disturbances generated by the Project result in nest abandonment, reduced reproductive success, or loss or reduced health or vigor of eggs or young during the breeding season. Conversion of the Project site from agricultural land to an industrial area would result in the loss of suitable breeding, foraging, or overwintering habitat for species that may utilize the Project site.

Mitigation Measure BIO-2 indicates that the Project intends to seek coverage for the Project under the San Joaquin County Multi-Species Habitat Conservation and Open

Victoria Lombardo, Senior Planner
 City of Tracy
 March 3, 2026
 Page 5

Space Plan (SJMSCP). The draft EIR does not propose or identify specific and sufficient mitigation in the event that the Project does not obtain full coverage under the SJMSCP, nor does it propose mitigation for species not covered by the SJMSCP, such as Crotch's bumble bee. Impacts to special-status species need to be addressed with specific, enforceable mitigation measures in the event that SJMSCP does not approve coverage, if the Project opts not to seek coverage, or if the Project may impact any species which are not covered under the SJMSCP.

Unauthorized take of listed and candidate species pursuant to the CESA is a violation of California Fish and Game Code section 2080 et. seq. If the Project cannot fully avoid take of such species, and if the SJMSCP does not offer take coverage for such species or if the Project does not participate in the SJMSCP, CDFW recommends the final EIR include language defining the Project's obligation to obtain take coverage through an ITP issued by CDFW.

Recommendation 1: To reduce impacts to covered species in the event that the Project cannot fully avoid take of such species, or if the SJMSCP does not offer take coverage for such species or if the Project does not participate in the SJMSCP, CDFW recommends that Mitigation Measure BIO-2 is updated in the final EIR as follows:

Mitigation Measure BIO-2. *Prior to development of the site, including the commencement of grading activities, the City of Tracy and the Project applicant shall consult with SJCOG to obtain coverage of the project pursuant to the SJMSCP. If the Project obtains take authorization under the SJMSCP ITP through participation in the SJMSCP, Permittee shall implement all biological survey and construction monitoring requirements as prescribed by the SJMSCP and shall compensate for impacts to habitat through payment of the appropriate fees as required by the terms of the SJMSCP.*

If the Project does not obtain coverage through the SJMSCP and surveys indicate the presence or potential presence of Swainson's hawk, western burrowing owl, tricolored blackbird, or any other species listed under CESA, the Project shall consult with CDFW for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation. If take cannot be avoided either during Project activities or over the life of the Project, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Recommendation 2: To reduce impacts to Crotch's bumble bee to less-than-significant levels, CDFW recommends the following specific and enforceable mitigation measure be incorporated as conditions of approval in the final EIR:

Crotch's Bumble Bee. *Crotch's bumble bee is not a species covered under the SJMSCP. If surveys indicate the presence or potential presence of Crotch's bumble bee, the Project shall consult with CDFW for guidance on the development of mitigation measures such as take avoidance, minimization, and mitigation. If take cannot be avoided either during Project activities or over the life of the Project, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.*

COMMENT 3: Impacts to Western Burrowing Owl

In a response letter to the Notice of Preparation of the draft EIR dated June 10, 2025, CDFW commented that the Initial Study for the Project relies upon mitigation measures that may not be sufficient to reduce impacts to special-status species, including western burrowing owl, to less-than-significant levels. The draft EIR relies upon the Initial Study to conclude that Project impacts related to Biological Resources are less-than-significant (page 1.0-5). Project-related impacts to western burrowing owl may therefore still be potentially significant.

Victoria Lombardo, Senior Planner
City of Tracy
March 3, 2026
Page 6

Mitigation Measure BIO-1 proposes the implementation of 75-meter protective buffers around active nests to protect western burrowing owl during the breeding season. The proposed 75-meter protective buffer for burrows containing active nests does not meet current CDFW guidance for setback distances adjusted for more sensitive times of year or medium-to-high levels of disturbance and may not be adequate to protect western burrowing owl from Project-related disturbance (CDFW, 2012).

Mitigation Measure BIO-1 also allows for the eviction burrowing owl from occupied burrows. Eviction from burrows often results in increased stress on burrowing owls and could depress reproduction, increase predation, increase energetic costs, and introduce risks posed by having to find and compete for available burrows. Please be advised that CDFW does not consider exclusion of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a "take" avoidance, minimization, or mitigation measure, and eviction of burrowing owls is a potentially significant impact under CEQA.

Recommendation: To reduce impacts to western burrowing owl to less-than-significant levels, CDFW recommends that the following specific and enforceable mitigation measure be incorporated as a condition of approval in the final EIR in the event the Project does not obtain coverage through the SJMSCP:

Western Burrowing Owl No-Disturbance Buffers: *A qualified biologist shall clearly delineate a no-disturbance buffer around all western burrowing owl burrows, including nesting, roosting, and satellite burrows, or the entire burrow complex within and adjacent to within 150 meters of the Project Area with posted markers demarking the area to avoid, using stakes, flags, and/or rope or cord to minimize the disturbance of western burrowing owl habitat. Buffers shall be determined based upon the time of year and level of disturbance as described in the CDFW 2012 Staff Report. If burrows cannot be fully avoided, CDFW shall be consulted.*

COMMENT 4: Unmitigated Impacts to Western Burrowing Owl Habitat

Based on aerial imagery and information provided in the Initial Study (page 35), land within and adjacent to the Project site may provide suitable foraging and roosting habitat for western burrowing owl. The Project site is within the year-round range of western burrowing owl and there are 23 California Natural Diversity Database (CNDDDB) occurrences documented within 5 miles of the Project site (CDFW, 2026).

The Project has the potential to result in the loss or modification of breeding, nesting, dispersal, and foraging habitat, and the removal of habitat structural features (e.g. nests, burrows, burrow surrogates). Western burrowing owl have the potential to occur within the Project site, or within areas adjacent to the Project site where they may be disturbed permanent and temporary habitat disturbance associated with the Project from ground disturbance, noise, lighting, air pollution, traffic, and increased human presence.

Western burrowing owl were formerly numerous throughout the San Francisco Bay Area region, particularly in the interior east of the Bay. Based on the burrowing owl endangered species petition, the number of breeding burrowing owl pairs in the San Francisco Bay area have declined from 165 in 1993 to less than 25 in 2023. Of the five primary threats it lists, the 2024 Burrowing Owl Petition identifies habitat loss, fragmentation, and degradation as the primary threat to burrowing owl in California.

The draft EIR does not adequately mitigate for the Project's potential impacts to western burrowing owl habitat. Western burrowing owl is listed as a candidate species under the CESA, which qualifies it as a rare, threatened, or endangered species under CEQA. The Project therefore has the potential to result in a substantial reduction in the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species. These

Victoria Lombardo, Senior Planner
 City of Tracy
 March 3, 2026
 Page 7

unmitigated impacts are considered mandatory findings of significance pursuant to the California Code of Regulations Title 14, section 15065(a)(1).

Recommendation: To reduce impacts to western burrowing owl to less-than-significant levels, CDFW recommends that the following specific and enforceable mitigation measure be incorporated as a condition of approval in the final EIR in the event the Project does not obtain coverage through the SJMSCP:

Western Burrowing Owl Habitat Mitigation: *In the event the Project does not obtain coverage through the SJMSCP, The CDFW 2012 Staff Report states, "current scientific literature supports the conclusion that mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat area for breeding, foraging, wintering, dispersal, presence of burrows, burrow surrogates..." If the Project would impact an unoccupied nesting burrowing owl burrow or burrow surrogate (i.e., a burrow known to have been used in the past three years for nesting), or an occupied burrow (where a non-nesting owl would be evicted as described above), impacts to burrowing owl habitat should be mitigated for at a minimum 1:1 mitigation to impact ratio through a conservation easement and implementing and funding a long-term management plan in perpetuity.*

COMMENT 5: Unmitigated Impacts to Swainson's Hawk Habitat

In a response letter to the Notice of Preparation of the draft EIR dated June 10, 2025, CDFW commented that the Initial Study for the Project relies upon mitigation measures that may not be sufficient to reduce impacts to special-status species, including Swainson's hawk, to less-than-significant levels. The draft EIR relies upon the Initial Study to conclude that Project impacts related to Biological Resources are less-than-significant (page 1.0-5). Project-related impacts to Swainson's hawk may therefore still be potentially significant.

Swainson's hawk is historically common within the vicinity of the Project site. The site is located within the geographic summer range of Swainson's hawk and there are 56 CNDDDB occurrences documented within 5 miles of the site, with many of these documented occurrences representing known or suspected nest sites (CDFW, 2026). The Initial Study also acknowledges that agricultural land within and adjacent to the Project site may provide foraging habitat for Swainson's hawk. The Project proposes to convert the Project site from agricultural land to industrial use, which could result in the permanent loss of foraging habitat for Swainson's hawk.

Swainson's hawk populations have experienced a precipitous decline over the past century, shrinking from an estimated 17,000 pairs to a population of only 375 pairs by the late 20th century (CDFW, 2016). The decline was primarily a result of habitat loss from development, and current populations continue to be threatened by on-going and cumulative loss of foraging habitat (CDFW, 2016). Swainson's Hawk densities are the greatest in the southern Sacramento Valley, particularly in the counties of Sacramento, Yolo, and San Joaquin, where urban development continues to reduce foraging habitat (CDFW, 2016).

The draft EIR does not adequately mitigate for the Project's potential to result in the loss of foraging habitat through the conversion of agricultural land to an industrial area. Swainson's hawk is listed as a threatened species under CESA, which qualifies it as a rare, threatened, or endangered species under CEQA. The Project therefore has the potential to result in a substantial reduction in range of an endangered, rare, or threatened species, a substantial degradation of the quality of the environment, or a substantial reduction in the habitat of a fish or wildlife species. These unmitigated impacts are considered mandatory findings of significance pursuant to the California Code of Regulations Title 14, section 15065(a)(1).

Recommendation: To reduce impacts to Swainson's hawk to less-than-significant levels resulting from the loss of potential foraging habitat, CDFW recommends that the following

Victoria Lombardo, Senior Planner
 City of Tracy
 March 3, 2026
 Page 8

specific and enforceable mitigation measure be incorporated as a condition of approval in the final EIR in the event the Project does not obtain coverage through the SJMSCP:

Swainson's Hawk Mitigation: *Loss of foraging habitat shall be mitigated at the appropriate ratio following CDFW's (then Fish and Game) Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (CDFW, 1994) prior to Project construction, and accepted by CDFW in writing. The Project shall be assumed to be within one mile of an active nest tree and mitigate at a 1:1 mitigation to impact ratio, unless protocol-level Swainson's hawk surveys are conducted demonstrating that Swainson's hawks are not nesting within one mile of the Project. Habitat mitigation shall include permanent preservation of foraging habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity.*

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 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.)

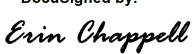
CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist the City of Tracy in identifying and mitigating Project impacts on biological resources.

Due to the issues presented in this letter, CDFW concludes that the draft EIR does not adequately identify or mitigate the Project's significant, or potentially significant, impacts on biological resources. Deficiencies in the Lead Agency CEQA document can affect later project approvals by CDFW in its role as a Responsible Agency. In addition, because of these issues, CDFW has concerns that Lead Agency may not have the basis to approve the project or make "findings" as required by CEQA unless the environmental document is modified to eliminate and/or mitigate significant impacts, as reasonably feasible (CEQA Guidelines, §§ 15074, 15091 & 15092).

Questions regarding this letter or further coordination should be directed to Torrey Soland, Environmental Scientist, at (707) 266-2878 or Torrey.Soland@wildlife.ca.gov; or Sara Kern, Senior Environmental Scientist (Supervisory), at Sara.Kern@wildlife.ca.gov.

Sincerely,

DocuSigned by:

 B77EQA6211EF486...
 Erin Chappell
 Regional Manager
 Bay Delta Region

Victoria Lombardo, Senior Planner
City of Tracy
March 3, 2026
Page 9

ec: Office of Land Use and Climate Innovation SCH No. 2025050796
Melissa Farhina, CDFW Bay Delta Region – Melissa.Farinha@wildlife.ca.gov

REFERENCES

- California Department of Fish and Wildlife (CDFW) (2012). Staff Report on Burrowing Owl Mitigation. State of California Natural Resources Agency, Sacramento, CA. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>.
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