

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE



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September 14, 2026

Justin Chapel
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Subject : Recycled Water Master Plan Phase 2 Project, Draft Environmental Impact Report, SCH 2025080058, City of Redwood City, San Mateo County

Dear Melinda Hue:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Environmental Impact Report (EIR) from the City of Redwood City (City) for the Recycled Water Master Plan Phase 2 Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Redwood City

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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Objective: The purpose of the Project is to provide a logical planning framework for the City to expand the existing Phase 1 recycled water system in phases to service additional customers and improve the existing recycled water system. Specifically, the proposed Project would establish a plan to: (a) expand the City's Recycled Water Service area to include the East market Assessment Service Area, which would then be subject to the Recycled Water Use Ordinance, (b) expand the City's Recycled Water pipeline system in the Central and East areas, which is home to a higher concentration of high-demand customers in close proximity; and (c) include back up water storage tanks and pumps.

Location: City of Redwood City, Citywide, in San Mateo County, CA 94063, Latitude 37.487318, Longitude -122.225492.

Timeframe: To be determined

REGULATORY REQUIREMENTS

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if a Project has the potential to result in “take” of plants or animals listed or candidates under CESA or Native Plant Protection Act (NPPA), either during construction or over the life of the Project. Issuance of a CESA 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 a CESA 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.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting 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 are generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through Horizontal Directional Drilling (HDD), is also subject to notification requirements. Any impacts to the mainstems, tributaries and floodplains or associated riparian habitat would likely require an LSA Notification. CDFW, as a responsible agency under CEQA, will consider the Final EIR for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA as a responsible agency

Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of

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any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

California Fully Protected Species

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

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

Specified types of infrastructure Projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code § 2081.15). Project proponents should consult with CDFW early in the Project planning process.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below 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 to improve the document.

I. Project Description and Related Impact Shortcoming

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 U.S. Fish and Wildlife Service (USFWS)?

COMMENT 1: Horizontal Directional Drilling

Section 4.4, Page 34

Issue: Though the draft EIR includes Mitigation Measure BIO-4 and BIO-5 (which describe construction best management practices to be employed for Project activities within 100 feet of Redwood Creek, and a requirement to prepare a Frac-out contingency plan prior to initiating any jack-and-bore or HDD activities beneath Redwood Creek), the draft EIR does not state whether CDFW would be notified per California Fish and Game Code section 1602 to obtain a LSA Agreement for project activities involving HDD under riparian habitat and stream channels.

Specific impact, why impact would occur, and evidence impact would be significant: HDD beneath the surface of waterways in the Project area has the potential to modify watershed functions by altering surface and groundwater flows, reducing structural integrity of the streambed and increasing the risk of erosion and scour. Use of HDD has potential for accidental release of drilling fluids (which contain clays and other deleterious substances such as chemical flocculants) into uplands, riparian habitat, or waterbodies. Processes that may result in the release of drilling fluids include hydraulic fracturing of the soils (i.e., frac-out) due to drilling pressures within subsurface substrate, and loss of fluids flowing along existing subsurface conduits (e.g., an existing fracture or a permeable layer of gravel that extends to the surface), and both processes could involve release of drilling fluids into the environment.

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Recommendation 1: To reduce potential impacts to streams or lakes or connected riparian habitat or wetlands to less-than-significant and comply with Fish and Game Code section 1600 et seq., CDFW recommends including the mitigation measure below.

Recommended Horizontal Directional Drilling Mitigation Measure: Prior to Project implementation, CDFW shall be notified pursuant to Fish and Game Code section 1600 et seq for all Project activities, affecting streams and associated riparian habitat including use of HDD. For HDD projects, the notification to CDFW shall include a thorough plan for HDD risk mitigation, as well as results of geotechnical investigations, scour analyses demonstrating pipeline alignments at sufficient depths beneath watercourses, hydro-fracture analyses determining the safety factor and potential risk of inadvertent return of drilling fluids, and incorporation of sufficiently sized setbacks of entry/exit locations from sensitive habitats. If available, the notification shall also include an HDD Execution Plan detailing construction risk mitigation measures such as inclusion of plastic sheeting with elevated borders under equipment, continuous monitoring during drilling, and testing of fluid volume and properties during drilling, at a minimum.

If CDFW determines that an LSA Agreement is warranted, the Project shall comply with all required measures in the LSA Agreement, including, but not limited to, requirements to mitigate impacts to streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a minimum 3:1 mitigation to impact ratio based on acreage and linear distance as close to the Project area as possible and within the same watershed and year as the impact, unless otherwise approved in writing by CDFW. Temporary impacts shall be restored on-site in the same year as the impact. The Project shall also consult with the Regional Water Quality Control Board (RWQCB) and U.S. Army Corps of Engineers (USACE) to impacts to waters such as streams, lakes, and wetlands, and obtain permits if necessary pursuant to the Clean Water Act and Porter Cologne Water Quality Control Act.

Please be advised that LSA Agreements issued for the Project would likely include the below recommended mitigation measures, as applicable, and additional measures to protect fish and wildlife resources.

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 USFWS?

COMMENT 2: California Ridgway's rail and California black rail

Section 4.4, Page 28

Issue: The draft EIR identifies California Ridgway's rail (*Rallus obsoletus obsoletus*, CRRA) and California black rail (*Laterallus jamaicensis coturniculus*, BLRA) as having potential to occur in the Project area, and that "occurrence would likely be limited to adjacent upland areas along Redwood Creek" (page 4.4-17). The draft EIR does not, however, provide specific analysis or discussion on how Project activities in the vicinity of riparian habitat at Redwood Creek could impact CRRA and BLRA, nor does the draft EIR include specific mitigation measures to avoid, minimize or mitigate potentially significant impacts to CRRA or BLRA.

Specific impact, why impact would occur, and evidence impact would be significant: CRRA (formerly California clapper rail) are listed as endangered under the CESA and the federal Endangered Species Act (ESA) and are State Fully Protected species. BLRA are listed as threatened under CESA and are State Fully Protected species. These cryptic shorebird species are at great conservation risk and are experiencing serious population

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declines or range retractions. As stated in the draft EIR, Project activities could include impacts such as generation of noise, light, and vibrations, disruption to riparian vegetation, potential water quality impacts due to frac-out, and operation and movement of equipment and workers. These activities have potential to disturb CRRRA and BLRA foraging, roosting, and/or nesting. Direct mortality of CRRRA or BLRA could also occur through nest abandonment, loss of potential foraging habitat resulting in reduced reproductive success (loss or reduced health or vigor of eggs or young), inadvertent entrapment or entrapment, or impingement.

CRRRA and BLRA are CESA-listed as endangered and threatened species, respectively, and therefore are threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if CRRRA or BLRA are injured or killed, or their habitat is removed as a result of the Project, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1). Further, as State Fully Protected species under California Fish and Game Code section 3511, take or possession is prohibited.

Recommendation 2: CDFW recommends the draft EIR provide additional assessment of the potential for the Project to impact CRRRA and BLRA, and incorporate the following mitigation measures to avoid, minimize, and mitigate potential impacts on these species:

Recommended CRRRA and BLRA Survey Mitigation Measure: Where Site-Specific Biological Resources Evaluations performed per Mitigation Measure BIO-1 determine that potential habitat for CRRRA and BLRA exists, construction related work activities shall be limited to outside the CRRRA/BLRA breeding season (February 1- August 31) or a CDFW and USFWS-approved biologist shall conduct protocol-level surveys of CRRRA and BLRA in all suitable habitat adjacent to the Project using the 2017 California Clapper Rail Survey Protocol to determine where CRRRA or BLRA are present in each year of construction (Wood et al. 2016). CDFW staff are available to collaborate to incorporate calls of BLRA into the protocol to ensure that both species are sufficiently surveyed.

Recommended CRRRA and BLRA Buffer Mitigation Measure: If CRRRA or BLRA are found in suitable habitat near the Project site, appropriate buffers shall be incorporated to avoid and minimize impacts to CRRRA and BLRA. A 700-foot no-work buffer shall be implemented between construction activities and any current-year breeding CRRRA and BLRA detections if construction cannot be avoided during the rail breeding season (January 15- August 31 for CRRRA, February 1- August 31 for BLRA). If establishing a 700-foot buffer around breeding rail detections is not feasible, noise reducing modifications to equipment as well as portable acoustic barriers/blankets placed near noise sources may be appropriate to reduce auditory and visual impacts to breeding rails. Note that these noise reduction features may be appropriate regardless of time of year to minimize impacts to foraging rails as well. CDFW recommends that a qualified avian biologist advise and support buffer establishment in consultation with CDFW.

Recommended CRRRA and BLRA Take Avoidance Measure: Fully Protected species such as CRRRA and BLRA may not be taken or possessed at any time. In the event a Fully Protected species is found within or adjacent to the Project site, a qualified biologist shall implement an appropriate no-disturbance buffer (see Recommended CRRRA and BLRA Buffer Mitigation Measure) and allow the individual to leave the Project site of its own volition. The qualified biologist shall also be on-site during all Project activities to ensure that Fully Protected species are not being disturbed by Project activities.

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COMMENT 3: California Least Tern

Section 4.4, Page 28

Issue: The draft EIR identifies California least tern (*Sternula antillarum browni*, LETE) as having potential to occur in the Project area, and that “occurrence would likely be limited to adjacent upland areas along Redwood Creek” (page 4.4-18). The draft EIR does not, however, provide specific analysis or discussion on how Project activities in the vicinity of riparian habitat at Redwood Creek could impact LETE, nor does the draft EIR include specific mitigation measures to avoid, minimize or mitigate potentially significant impacts to LETE.

Specific impact, why impact would occur, and evidence impact would be significant: LETE are CESA and federal ESA endangered and state fully protected species. Populations of LETE nest along the West coast of North America from Baja California north to the San Francisco Bay and establish nesting colonies on sandy soils with little vegetation along Pacific Ocean beaches, lagoons and bays (USFWS 1980). LETE were once widespread and abundant, but increasing human disturbance to sandy beaches, hunting for the millinery trade, and increasing predator populations caused the population to undergo a major decline in the early 1900s (USFWS 2006).

As stated in the draft EIR, Project activities could include impacts such as generation of noise, light, and vibrations, disruption to riparian vegetation, potential water quality impacts due to frac-out, and operation and movement of equipment and workers. These activities have potential to disturb LETE foraging, roosting, and nesting. Direct mortality of LETE could occur through nest abandonment, resulting in reduced reproductive success (loss or reduced health or vigor of eggs or young), inadvertent entrapment or entrapment, or impingement.

LETE are CESA- and federal ESA-listed endangered species and therefore are threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if LETE are injured or killed, or their habitat is removed as a result of the Project, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1). Further, as State Fully Protected species under California Fish and Game Code section 3511, take or possession is prohibited.

Recommendation 3: CDFW recommends the draft EIR provide an assessment of the potential for the Project to impact LETE individuals as well as foraging and breeding habitat, and incorporate the following mitigation measure to avoid, minimize, and mitigate potential impacts of the Project on this species.

Recommended LETE Mitigation Measure: Where Site-Specific Biological Resources Evaluations performed per Mitigation Measure BIO-1 determine that potential habitat for LETE exists, construction related work activities shall be limited to outside the LETE breeding season (April 15- September 15) or a CDFW-approved biologist, in coordination with CDFW, shall conduct breeding and occupancy surveys for LETE in all suitable habitats within and adjacent to the Project area during the LETE nesting season prior to each year of construction to determine whether LETE are present and/or foraging within the Project area.

If LETE are found in suitable habitat near the Project area, appropriate buffers shall be incorporated to avoid and minimize impacts to LETE. A 700-foot no-work buffer shall be implemented between construction activities and any current-year breeding LETE detections. Noise-reducing modifications to equipment as well as portable acoustic barriers/blankets placed near noise sources may be appropriate to reduce auditory

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and visual impacts to breeding shorebirds. A qualified avian biologist shall advise and support buffer establishment in consultation with CDFW. Fully protected species such as LETE may not be taken or possessed at any time. The qualified biologist shall be on-site during all Project activities to ensure that fully protected species impacts are avoided by all Project activities.

COMMENT 4: Salt-Marsh Harvest Mouse

Section 4.4, Page 28

Issue: The draft EIR identifies salt-marsh harvest mouse (*Reithrodontomys reviventris*, SMHM) as having potential to occur in the Project area, and that “occurrence would likely be limited to the Redwood Creek area where it empties to the Bay. The draft EIR does not, however, provide specific analysis or discussion on how Project activities in the vicinity of riparian habitat at Redwood Creek could impact SMHM, nor does the draft EIR include specific mitigation measures to avoid, minimize or mitigate potentially significant impacts to SMHM.

Specific impact, why impact would occur, and evidence impact would be significant: SMHM are CESA and federal ESA endangered and state Fully Protected species. As stated in the draft EIR, Project activities could include impacts such as generation of noise, light, and vibrations, disruption to riparian vegetation, potential water quality impacts due to frac-out, and operation and movement of equipment and workers that could have the potential to impact SMHM if they are present within the Project area.

SMHM are CESA- and federal ESA-listed endangered species and therefore are threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if LETE are injured or killed, or their habitat is removed as a result of the Project, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1). Further, as State Fully Protected species under California Fish and Game Code section 3511, take or possession is prohibited.

Recommendation 4: CDFW recommends the draft EIR provide an assessment of the potential for the Project to impact SMHM, and incorporates the following mitigation measure to avoid, minimize, and mitigate potential impacts of the Project on this species:

Recommended SMHM Mitigation Measure: Prior to impacting salt marsh habitat, an approved qualified biologist familiar with SMHM shall walk through and inspect suitable habitat prior to commencing Project activities in the vicinity of Redwood Creek and search for signs of SMHM. If SMHM are observed, they shall be allowed to leave the Project area of their own volition, CDFW shall be notified immediately, and work may commence only once the qualified biologist determines SMHM have left the Project area. Fully protected species such as SMHM may not be taken or possessed at any time. The qualified biologist shall be on-site during all Project activities to ensure that fully protected species impacts are avoided by all Project activities.

II. Environmental Setting and Related Impact Shortcoming

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 5: Creek Crossings

Section 4.4, Page 22

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Issue: The draft EIR includes a description of “Aquatic Resources and Sensitive Habitats” present within the Project area, and states that the proposed Project crosses Redwood Creek and Arroyo Oyo, a tributary to Redwood Creek, at four locations (Veteran’s Boulevard at Redwood Creek, 1036 El Camino Real, 855 Jefferson Avenue, and 1039 Middlefield Road), and at the latter two crossings, Redwood Creek flows underground. Figure 2 provided in the Biological Resources Memorandum, prepared in October 2025 by LSA, corroborates the summary of creek crossing locations provided in the draft EIR. However, the Biological Resources Memorandum also includes Figure 4, which depicts seven separate creek crossing locations in the Project area.

Additionally, the draft EIR does not describe how or whether riparian buffers would be implemented to protect creeks and their riparian areas from Project activities. Specifically, the draft EIR does not indicate where open trenching and pit/bore-holes would be located during implementation of jack-and-bore and/or HDD under creeks in the Project area.

Per CEQA Guidelines section 15125 (a), EIRs must include descriptions of the physical environmental conditions in the vicinity of the Project, and this environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant, the purpose of which is to give the public and decision makers the most accurate and understandable picture practically possible of the Project’s likely near-term and long-term impacts. The discrepancy between the location and number of creek crossings depicted in Figures 2 and 4 in the Biological Resources Memorandum does not establish a clear and understandable picture of the Project’s impacts, and given this discrepancy, the description of proposed activities in the draft EIR does not facilitate meaningful review of potentially significant impacts of Project development on creeks in the Project area.

Specific impact, why impact would occur, and evidence impact would be significant: Riparian vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat (Moyle 2002, CDFW 2007). Development within or adjacent to riparian zones can result in fragmentation of riparian habitat and decreases in native species abundance and biodiversity (Davies et al. 2001, CDFW 2007). Riparian buffers help keep pollutants from entering adjacent waters, benefiting species who rely on those waters for habitat and drinking water. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosofske et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Riparian habitats also contribute to bank stability and provide flood protection. Development can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows. Riparian habitat and adjacent wetlands and floodplains are critical to lessening these impacts because they store and meter floodwaters, recharge groundwater aquifers, trap sediment, filter pollution, help minimize erosion, lessen peak flow velocities, and protect against storm surges. In doing so, they protect adjacent upland, down-stream, and coastal properties from loss and damage during flooding and help maintain surface and groundwater during summer months.

Recommendation 5: CDFW recommends clarifying the discrepancy between Figures 2 and 4 in the Biological Resources Memorandum with respect to creek crossings. Additionally, CDFW recommends the draft EIR describe whether and how riparian buffers will be implemented to avoid impacts to creeks and their riparian areas during Project construction by describing and/or depicting where open trenching and pit/bore-holes would be located during implementation of jack-and-bore and/or HDD near creeks.

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The following mitigation measure is recommended for inclusion in the draft EIR to protect riparian areas:

Recommended Riparian Setback Mitigation Measure: Prior to project development in the vicinity of streams, wetlands, or other aquatic areas, an agency-approved qualified biologist shall conduct habitat surveys to identify riparian boundaries and determine the size of site-specific buffers necessary to protect riparian areas. Consideration for appropriate riparian buffer widths shall depend on site-specific characteristics such as the area and type of habitat to be buffered, the presence of habitat for sensitive species and their potential habitat use, site topography, slope, slope stability, and soils present at a particular site. Ground-disturbing activities (such as open trenching and excavation of pit/bore-holes for jack-and-bore and/or HDD techniques) shall occur outside of the site-specific riparian buffers identified by the qualified biologist.

COMMENT 6: Special Status Plants

Issue: According to the draft EIR, there is potential for CESA listed plant species to occur within the project vicinity. Bio-Measure-2 indicates if permanent impacts cannot be avoided, the City shall consult with CDFW and/or USFWS on species-specific compensatory mitigation, which may include off-site preservation, enhancement of riparian habitat, or conservation easements. However, the draft EIR does not require the project to obtain an ITP if take will occur to any CESA listed plants.

Specific impact, why impact would occur, and evidence impact would be significant: The conservation of special-status native plants is essential to maintaining biodiversity in the California Bay Area. Native plants are better adapted to the local environment, allowing them to grow more efficiently, require less maintenance, and provide habitat resources for other native species (Berthon et al. 2020). Industrial land development is a leading threat to endangered plant communities, causing resource depletion through direct habitat replacement and increased input of pollutants into the environment (Czech et al. 2000). Limited distribution and small population sizes of special-status plants can increase the difficulty in species detection, and robust survey efforts are imperative to determine whether plant species protected under the CESA and NPPA occur within the Project area. Robust and timely survey efforts are a necessary first step in avoiding take of listed species and preventing significant impacts to habitat in which they occur.

Recommendation 6: If full avoidance of a CESA or NPPA listed species such as San Marin western flax (*Hesperolinon congestum*) is not possible, the Project shall consult with CDFW and obtain a CESA ITP prior to Project construction, and shall comply with requirements set in the ITP, which may include habitat compensation requirements. The Project shall also consult with USFWS for potential impacts to federally listed plant species.

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>.

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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 in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Shannon Husband, Environmental Scientist, at (707) 337-1364 or Shannon.Husband@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Land Use and Climate Innovation, State Clearinghouse (SCH No. 2025080058)
Craig Weightman, CDFW Bay Delta Region – Craig.Weightman@wildlife.ca.gov

REFERENCES

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