



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



March 27, 2026

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SUBJECT: FOSTER CAMPUS CONNECTIVITY PROJECT (SCH# [2025080375](#))

Dear Deirdre Clem:

On March 4, 2026, the California Department of Fish and Wildlife (CDFW) received California State Polytechnic University at Humboldt's (Lead Agency) Initial Study and Draft Mitigated Negative Declaration (IS/MND) for the Foster Campus Connectivity Project (Project). CDFW appreciates the opportunity to provide feedback and understands the Lead Agency will accept comments through April 2, 2026.

As the Trustee Agency for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations (Fish & G. Code, §§ 1801 & 1802). As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as Trustee and Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Pub. Resources Code, §21000 et seq.). These comments are intended to minimize Project impacts on public trust resources.

Project Description

The Project is located at 2000 Foster Avenue (APNs 505-161-011 and 505-161-009) within the City of Arcata, in Humboldt County, California. The 16.7-acre property is currently undeveloped, consisting primarily of non-native shrubs and ruderal

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grassland, with areas of barren gravel and remnants of concrete from an old lumber mill. Agricultural land extends south and west of the Project site, with residential uses to the north and east. The riparian corridor of McDaniel Slough (Janes Creek) runs north-south along the eastern edge of the property. Cal Poly Humboldt proposes to develop and operate an off-campus parking lot and shuttle station on the southernmost four acres. Project components include the paved parking lot, shuttle station and service, safety lighting, landscaping, and on-site stormwater management features, as well as a shared pedestrian and bike path over McDaniel Slough. The Project would also include a minor revision to the Campus Master Plan to incorporate the Project site.

CDFW Consultation History

CDFW visited the property and provided recommendations in 2023 as part of project scoping and preliminary design.

Biological Significance

McDaniel Slough and its associated wetlands and riparian forest provide important habitat for a variety of fish and wildlife, including several special status species. Juvenile Coho Salmon (*Oncorhynchus kisutch*; ST, FT¹) rear in the low gradient reaches of Janes Creek (Ward 2025), where slow-moving water and complex cover provide refuge and abundant prey. Although non-natal rearing is likely to account for most parr, an abundance of fry in the spring of 2025 suggests that Coho Salmon may have spawned in Janes Creek the preceding winter (Ward 2025). The stream also supports a substantial population of Coastal Cutthroat Trout (*O. clarkii*; SSC), as well as occasional steelhead (*O. mykiss irideus*; SSC), Pacific Lamprey (*Entosphenus tridentatus*; SSC), and Western Brook Lamprey (*Lampetra richardsoni*; SSC). Northern red-legged frog (*Rana aurora*; SSC) and other amphibians are widespread and abundant throughout the stream network. Despite urbanization, Janes Creek continues to support anadromy and other aquatic life and has been prioritized for fish passage remediation and instream habitat restoration.

¹ Abbreviations: ST – State listed, threatened; FT – federally listed, threatened; SSC – CDFW Species of Special Concern

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Comments and Recommendations

The IS/MND was recently recirculated due to the addition of a shared pedestrian and bike path over McDaniel Slough. The alignment would follow an existing footpath along the railroad prism, which crosses McDaniel Slough via a culvert through an earthen embankment. No additional details were provided about the size or condition of the stream crossing. However, the Passage Assessment Database (PAD) describes the culvert as an “*extremely undersized circular, SSP (6.5' dia [sic] x 57.1' L) in poor condition*” and categorizes it as a partial barrier for resident trout and all age classes of juvenile salmonids (CDFW 2025). Although the culvert appears to provide areas of adequate water depth and low velocity under some flow conditions, it constricts the stream channel and may impede the passage of juvenile salmonids at higher flows. Its condition has further deteriorated since the original assessment in 2010, with severe and widespread rust (Figure 1), including several holes in the culvert walls that allow flows to interact with earthen fill materials (Figure 2). The culvert is also undersized and therefore at risk of plugging due to debris transport and accumulation, as evidenced by the branches partially obstructing the inlet (Figure 3). A utility pipe running perpendicular to the culvert further constricts debris passage during storm flows (Figure 4).

The compromised structure is at the end of its service life and is unlikely to support long-term use of the proposed pedestrian and bike path. Repairing or maintaining the existing culvert would be a violation Fish and Game Code section 5901, which makes it unlawful to construct or maintain any device that prevents, impedes, or tends to prevent or impede the passage of fish up- or downstream. To remediate fish passage and restore stream channel morphology, CDFW recommends removing the culvert and replacing it with a full-span footbridge (**Recommendation 1**). The crossing should be designed by an engineer to accommodate 100-year flow and associated debris and sediment while maintaining the native stream substrate (**Recommendation 2**). Upgrading the crossing would require authorization from CDFW pursuant to Fish and Game Code section 1602 et seq. and the California Endangered Species Act (CESA) (Fish & G. Code § 2050 et seq.; see Cal. Code Regs., tit. 14, § 783 et seq.). Please contact CDFW to discuss the Project and explore permitting pathways (**Recommendation 3**).


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Summary of Recommendations

- 1) To remediate fish passage and restore stream channel morphology, remove the culvert and replace it with a full-span footbridge.
- 2) The crossing should be designed by an engineer to accommodate 100-year flow and associated debris and sediment while maintaining the native stream substrate.
- 3) Contact CDFW to discuss the Project and explore permitting pathways.

Thank you for the opportunity to comment on this IS/MND. Please contact Kathryn Rian, Environmental Scientist, at Kathryn.Rian@wildlife.ca.gov with any questions or comments.

Sincerely,

DocuSigned by:

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Enclosure: Figures

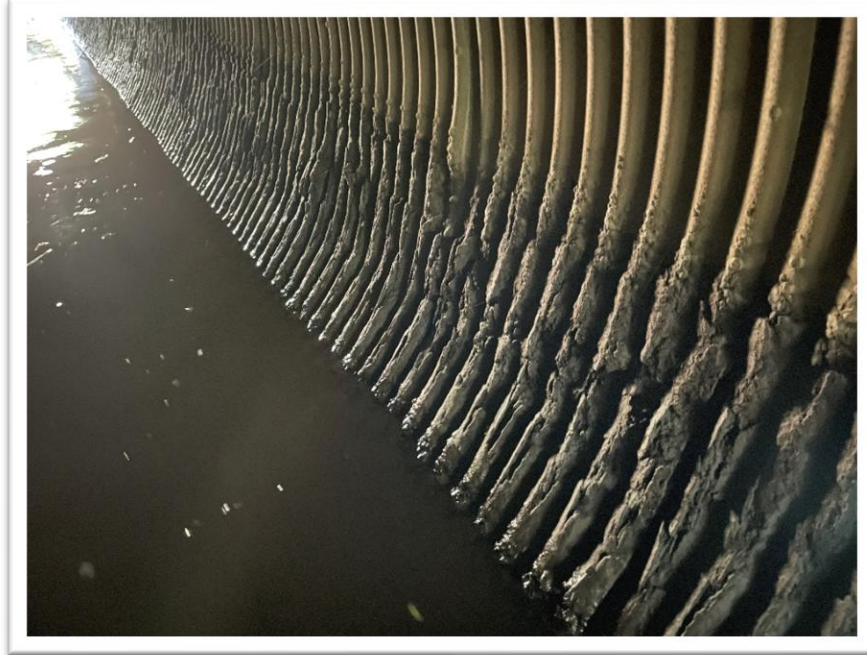


Figure 1. Well-developed rust line along the interior culvert wall, showing extensive corrosion. Taken facing upstream, March 18, 2026.



Figure 2. Section of rusted out culvert wall where flows have begun to erode earthen fill materials. Taken at the outlet (shovel included for scale), March 18, 2026.

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Figure 3. Culvert inlet is partially obstructed by large branches. Note rust line located mid-wall and rusted out areas at water level. Taken facing upstream toward the inlet, March 18, 2026.



Figure 4. A utility pipe running perpendicular through the culvert has the potential to catch storm debris. Taken near the outlet, facing upstream, March 18, 2026.

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References

- California Department of Fish and Wildlife. 2025. Passage Assessment Database. Available from [California Fish Passage Assessment Database \[ds69\] - Dataset - California Open Data](#).
- Ward, D. 2025. Janes and Jolly Giant Creeks Fish Monitoring Report. California State Polytechnic University Humboldt.