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January 2, 2026

Syd Sotoodeh, Senior Planner
Contra Costa County Department of Conservation and Development
30 Muir Road
Martinez, CA 94553
syd.sotoodeh@dcd.cccounty.us

Subject: San Pablo Dam Road Storm Drain and Pavement Repair Project, Mitigated Negative Declaration, SCH No. 2025120302, Contra Costa County

Dear Syd Sotoodeh:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) from Contra Costa County Department of Conservation and Development (County) for the San Pablo Dam Road Storm Drain and Pavement Repair 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

[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.

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: Contra Costa County Public Works Department

Objective: The objective of the Project is to remediate damages to a culvert system that conveys stream flows beneath San Pablo Dam Road and resulting damages to the roadway. Existing dual 72-inch corrugated metal pipe culverts will be replaced with 66-inch steel casing pipes, which will be installed in sections using a pipe ramming method and welded on-site. A new 48-inch metal pipe culvert will be installed to the south of the existing culverts to maintain hydraulic capacity of the culvert system using a jack-and-bore pipe installation method. Concrete grout will be installed to reinforce the exterior of the pipes. An existing concrete flume located at the downstream end of the culvert system will be demolished and reconstructed, and existing concrete headwalls at the inlet and outlet will be demolished and reconstructed. A failed 36-inch culvert will be filled with cement and abandoned in place. The damaged roadway will be excavated and rehabilitated. To prepare the Project site and facilitate staging of equipment and construction access, approximately 27 trees will be removed, vegetation will be cleared and grubbed within the Project area, water diversions will be installed to isolate the Project area from stream flows, and a cattle fence will be temporarily installed. Disturbed areas will be hydroseeded with a native seed mix and native trees will be replanted following construction.

Location: The Project is located on San Pablo Dam Road approximately 1.2 miles east of Wildcat Canyon Road and approximately one mile northwest of the City of Orinda in unincorporated Contra Costa County. The approximate Project coordinates are Latitude 37.908789° and Longitude -122.231350°.

Timeframe: Construction of the proposed project is expected to begin in 2026 and last approximately 115 working days between May 2026 and December 2026.

REGULATORY REQUIREMENTS

California Endangered Species Act and Native Plant Protection 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 or the Native Plant Protection Act (NPPA), either during construction 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- or NPPA- listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain an ITP. CEQA requires a mandatory finding of significance if a project is likely to substantially 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, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Fully Protected Species

Fully protected species, such as white-tailed kite (*Elanus leucurus*), golden eagle (*Aquila chrysaetos*), and bald eagle (*Haliaeetus leucocephalus*) 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. (See Fish & G. Code §2081.15.) Project proponents should consult with CDFW early in the project planning process.

Lake and Streambed Alteration Agreement

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

Raptors and Other Nesting Birds

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).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County 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. Based on the Project’s avoidance of significant impacts with implementation of mitigation measures, CDFW concludes that an MND is appropriate for the Project.

I. Mitigation Measure or Alternative and Related Impact Shortcoming

COMMENT 1: Culverts May Impede Wildlife Passage

Issue: The IS/MND concludes that the Project will not impact wildlife movement corridors, indicating that the Project site provides limited connectivity opportunities (p. 41). However, in its evaluation of potential impacts, the IS/MND does not assess the potential operational impacts of the new culvert system upon wildlife connectivity. Without this evaluation, it cannot be concluded that Project-related impacts to the movement of wildlife would be less-than-significant.

Specific impact: The Project proposes to replace an existing dual culvert system that conveys stream flows beneath a roadway. Roadways can be a barrier to wildlife movement and limit the ability of terrestrial wildlife to access portions of their habitat, thereby posing a risk of habitat fragmentation and habitat loss. Wildlife that enter roadways are vulnerable to direct mortality from vehicle strike. Culverts can provide connectivity across barriers presented by roadways and thereby help mitigate the negative impacts of roadway barriers (Sparks & Gates, 2017; Clevenger et. al., 2002). However, improperly constructed culverts can result in a variety of conditions that have the potential to act as barriers to movement (Diebel et. al., 2015; Gibson et. al., 2005; CDFW, 2009). If the existing culverts are an established movement corridor beneath the roadway, and if the replacement culverts introduce a barrier to that movement, this may result in increased risks to wildlife posed by the roadway barrier, including habitat loss, habitat fragmentation, and direct mortality.

Why impact may occur: The length of the replacement culverts will remain unchanged compared to the existing culverts, but the diameters will decrease from 72 inches to 66 inches. This will result in a reduced flow capacity, which could result in an increased flow velocity of water passing through the culverts. Though the IS/MND indicates that a new 48-inch culvert will be installed to the south of the dual culverts to compensate for the reduced hydraulic capacity of the system, it is not clear what the potential impacts will be upon water velocities or whether the culverts will be of a size that could potentially constrict the stream channels.

Culvert designs that result in either high water velocity or shallow depth within the culvert can pose a barrier to wildlife movement (Diebel et. al., 2015). Aquatic organisms, such as fish, amphibians, reptiles, and invertebrates can also be directly impacted if stream channels are constricted, as the accumulation of debris and sediment may impede passage of fish and wildlife species (Wagner, 2015). The IS/MND does not evaluate the potential for wildlife to utilize the existing culverts for movement beneath the roadway, but studies of roadway crossings have documented a wide variety of wildlife species using culverts for passage beneath roads, including smaller wildlife such as snakes, reptiles, and frogs (Sparks & Gates, 2017; Sparks & Gates, 2012).

The IS/MND indicates that California red-legged frog, northwestern pond turtle, and Alameda whipsnake have the potential to occur within the Project site. California red-legged frog and northwestern pond turtle both require aquatic and upland habitat (Pierce et. al., 2021; Alvarez & Vecchio, 2024), and the existing culverts may provide habitat connectivity between upland habitat to the western side of the roadway and downstream habitat and San Pablo Reservoir to the east of the roadway. Alameda whipsnake are known to use riparian corridors for movement, and snake species may utilize culverts as movement corridors (U.S. Fish and Wildlife Service (USFWS), 2000; Sparks & Gates, 2012). If the new culverts introduce a barrier to an established movement corridor beneath the roadway within the Project site, this may limit the ability of terrestrial wildlife to access previously available habitat.

Evidence impact would be significant: California red-legged frog and northwestern pond turtle are California State Species of Special Concern (SSC), and Alameda whipsnake is an endangered species pursuant to CESA (Fish & G. Code § 2050). Consistent with CEQA Guidelines, the status of each qualifies California red-legged frog, northwestern pond turtle, and Alameda whipsnake as endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). Habitat loss and fragmentation is one of the primary threats to all three species (Thomson et. al., 2016; USFWS, 2000). If the Project has the potential to substantially reduce the habitat or restrict the range of these species, this would be a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

To reduce impacts to less-than-significant: CDFW offers the following recommendations to reduce the likelihood that the project could impede fish and wildlife passage, degrade habitat, or present a safety risk during its lifetime:

Recommendation 1: Evaluate Impacts to Biological Resources in Areas with Hydrological Connectivity. CDFW recommends that the County evaluate potential impacts on any biological resources (e.g., rare plants, wildlife) in areas adjacent to the Project site where there is hydrologic connectivity. CDFW recommends that the County disclose methodology and findings in a recirculated IS/MND, including a discussion of potential impacts and, if necessary, avoidance, minimization, and mitigation measures.

Recommendation 2: Adherence to Established Guidelines. CDFW recommends that culverts are designed and installed to withstand the 100-year peak flood flow event without compromising the structural integrity of the culvert and without overtopping the culvert inlet (CDFG, 2002; NOAA, 2023).

Recommendation 3: Small Animal-Friendly Culverts. Contra Costa County Department of Public Works should design culverts with consideration for wildlife passage. Culverts should be designed to provide conditions that minimize avoidance responses of species that may utilize the culvert for passage. Considerations may include but are not limited to: maintaining appropriate flow velocities for target species, maintaining an appropriate substrate, and/or installing wildlife shelving that can be attached to allow small animals to move through culverts when water is flowing. The County should use concepts outlined in the Measures to Reduce Road Impacts on Amphibians and Reptiles in California (Langston, T.E.S. & Clevenger, A.P., 2020), Wildlife Crossings Guidance Manual (Meese et. al., 2007) and/or the Federal Highway Administration (FHWA) Wildlife Crossing Structure Handbook Design and Evaluation in North America, (FHWA, 2011). CDFW recommends post-construction effectiveness monitoring for a minimum of five years. CDFW also recommends adaptive management if the design is not effective at providing wildlife passage.

COMMENT 2: Impacts to Roosting Bats, Including Pallid Bat

Issue: The IS/MND does not discuss potential Project-related impacts to bat species, including pallid bat (*Antrozous pallidus*). The Special-Status Wildlife Species Habitat Evaluation (Table 2, Appendix B) indicates that there is no suitable habitat for pallid bat present on the Project site; however, the Project site contains anthropogenic structures and oak woodland habitat that could potentially support pallid bat or other bat species. Project-related impacts to roosting bats may therefore still be *potentially significant*.

Specific impact: Removal of potential roost habitat within the Project site, such as trees or culverts, may result in the direct mortality of bats if they are present within the refugia but are undetected at the time of removal. Project-related disturbances to maternity roosts may result in roost abandonment, reduced reproductive success, or loss or reduced health or vigor of young, while disturbances to hibernation roosts may reduce the survival of bats by causing them to deplete their energy reserves from repeated waking or by forcing them to expend critical energy on evasion and location of a suitable replacement roost. Project-related disturbances may also prevent bats from accessing roosting habitat during construction, and Project implementation may result in the permanent loss of roosting habitat for bat species.

Why impact would occur: The Project proposes to remove approximately 27 trees to prepare the site for construction. Additionally, one 36-inch corrugated metal pipe culvert will be filled and abandoned, and two corrugated metal pipe culverts will be replaced with steel casing pipes. The Project site is within the current range of several species of North American bats, including pallid bat, a State Species of Special Concern. Pallid bats have been documented using a variety of roosting sites, including live trees, snags, and anthropogenic structures (Baker et. al., 2008).

Even low levels of human disturbance during the maternity season can cause mothers to abandon roost sites, which may result in the mortality of young bats (Beck & Rudd, 1960). Pallid bats in particular are highly sensitive to maternity roost disturbances, and mothers will often move roosts if disturbed (Beck & Rudd, 1960). Due to low reproductive rates and sensitivity of breeding females to disruption, maternity colonies affected by human activities that temporarily reduce fecundity or result in mortality may require multiple years to recover following disturbance events (Caltrans, 2019). Similarly, disturbance to hibernating bats or bats that have entered torpor during the winter can result in mortality. Many bat species hibernate or enter torpor to conserve energy at a time when resources are scarce, and repeated arousal during hibernation or torpor can deplete energy reserves and reduce survival (O'Shea et. al., 1977; Boyles & Brack, 2009).

Evidence impact would be significant: Project activities that may result in the mortality of bats, such as the removal of occupied bat roosts or disturbance that causes the loss of a maternity colony or hibernating colony, may be considered "take" under California Fish and Game Code (Fish & G. Code, § 86). Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Furthermore, pallid bat is an SSC, a status which qualifies it as a rare, threatened, or endangered species under CEQA (CEQA Guidelines, § 15380).

To reduce impacts to less-than-significant: CDFW recommends that the IS/MND is revised to include an evaluation of potential Project-related impacts to roosting bats, including pallid bat, and recirculated. To help mitigate Project-related impacts to a less-than-significant level, CDFW recommends the inclusion of the following potentially feasible mitigation measures:

> <u>*Removal of Potential Tree Roosts*</u>*. Prior to conducting woody vegetation modification or tree removal, the qualified biologist shall survey trees within the Project site for potential bat roosting habitat (e.g. dense foliage, cracks, crevices, exfoliating bark). The qualified biologist shall flag or mark all trees with potential roosting habitat, and the removal or modification of trees with potential roosting habitat shall be restricted to the periods from* ***March 1 through April 15*** *and* ***August 31 through October 15****. To ensure that bats have left potential roosting trees, trees with potential roosting habitat shall be removed over the course of two days. On the first day, limbs shall be removed in the late afternoon. This disturbance should cause potentially roosting bats to seek other roosts during their nighttime foraging. The remainder of the tree can then be removed on the second day as late in the afternoon as feasible.*
>
> <u>*Removal of Potential Structural Roosts*</u>*. The Project shall avoid removal of all potential bat roosting habitat during bat maternity season (April 15 – September 1) and hibernation season (October 15 – March 1). If these seasonal windows cannot be avoided, a qualified biologist shall conduct visual surveys for bats of any potential roosts, as well as daytime and evening acoustic surveys, no more than* ***14 days*** *prior to removal of potential habitat. If bats are found or suspected to be roosting within the Project site, the qualified biologist shall identify the species, estimated quantity present, roost type, and roost status. The qualified biologist shall avoid disturbing bats during surveys. Under no circumstances shall an active maternity roost be removed or disturbed.*

Removal of refugia shall not be performed under any of the following conditions: during any precipitation events, when ambient temperatures are below 4.5 degrees Celsius, when windspeeds exceed 11 miles per hour, and/or any other condition which may lead to bats seeking refuge.

<u>Roosting Bat Avoidance and Mitigation</u>. If bats are found to be roosting within the Project site, the qualified biologist shall develop a Bat Mitigation and Monitoring Plan, which shall include: (1) an assessment of all direct and indirect Project impacts to bats based on survey results; (2) effective avoidance and minimization measures to protect bats based on species and roost type(s) to be impacted; (3) compensatory mitigation for permanent impacts to maternity roosts if impacted. Compensatory mitigation shall be appropriate for the species impacted and commensurate with the impacts, and may include installation of replacement habitat on-site (e.g. bat boxes) on a temporary and permanent basis. The Bat Mitigation and Monitoring Plan shall describe any monitoring and maintenance activities necessary to ensure compensatory habitat remains effective.

COMMENT 3: Impacts to Special-Status Raptors, including Golden Eagle, Bald Eagle, and White-Tailed Kite

Issue: The IS/MND does not evaluate potential Project-related impacts to golden eagle, bald eagle, or white-tailed kite. Mitigation Measure BIO-1g, which proposes mitigation for impacts to nesting birds, is insufficient to protect special-status raptor species from potential Project-related impacts. Project-related impacts to special-status raptors may therefore still be *potentially significant.*

Specific impact: The Project proposes to install new culverts using pipe ramming and jack-and-bore methods, which will generate noise and visual disturbances that could potentially disturb nesting birds within range of the Project site. The Project also proposes to remove approximately 27 trees from the Project site. Though the trees to be removed may not consist of preferred nesting habitat for golden eagle, bald eagle, or white-tailed kite, their removal could potentially remove a visual barrier to nests outside of the Project site, which may leave nests adjacent to the Project site more vulnerable to visual disturbance. Project activities including ground disturbance, operation of heavy machinery, and the movement of workers may generate noise or visual disturbances which may in turn result in nest abandonment, reduced reproductive success, or loss or reduced health or vigor of eggs or young. If nesting birds occur within the Project site and are undetected during surveys, Project activities including tree and vegetation removal may inadvertently crush, destroy, or remove active nests.

Why impact would occur: The Project site is located within the yearlong range of golden eagle and white-tailed kite, and within the winter range for bald eagle

(CDFW, 2021). The San Pablo Reservoir is located 0.3 miles to the east of the Project site and adjacent grassland and woodland habitat may provide habitat for bald eagle, golden eagle, or white-tailed kite. There is one California Natural Diversity Database (CNDDB) record of golden eagle and one CNDDB record of bald eagle within 5 miles of the Project site, and one historic bald eagle nest site within 1.5 miles of the Project site with multiple years of observations (CDFW, 2025). Eagles and other raptors are highly sensitive to disturbance at the nest site (Driscoll, 2010).

Evidence impact would be significant: Take of nesting birds, birds in the orders Falconiformes or Strigiformes, and migratory nongame bird as designated in the Migratory Bird Treaty Act is a violation of Fish and Game Code (§ 3503, 3503.5, 3513).

White-tailed kite, bald eagle, and golden eagle are State Fully Protected species (Fish & G. Code § 3511). The bald eagle is also an endangered species pursuant to CESA (Fish & G. Code § 2050). Consistent with CEQA Guidelines, the status of each qualifies white-tailed kite, bald eagle, and golden eagle as endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380). If white-tailed kite, bald eagle, or golden eagle are injured or killed as a result of Project implementation, 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).

To reduce impacts to less-than-significant: CDFW recommends that the Pre-Construction Surveys for Active Nests and Buffer Zone for Active Nests sub-measures of Mitigation Measure BIO-1g (p. 34) are updated to reflect the following potentially feasible mitigation measures:

> *<u>Pre-Construction Surveys for Active Nests</u>. If the proposed Project requires vegetation and/or tree removal to be removed during the nesting season (February 1 to September 15), pre-construction nesting bird surveys shall be conducted no more than 7 days prior to the start of ground or vegetation disturbance (including tree removal) and survey results presented to the County, for submittal to CDFW. The minimum survey radii surrounding the work area shall be the following: (1) 250 feet for non-raptors; (2) 1,000 feet for raptors; and (3) a one-mile radius of the Project site for golden eagle and bald eagle.*
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> *<u>Buffer Zone for Active Nests</u>. 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, iii)*

250 feet for passerines, and iv) one mile for golden eagle or bald eagle. Project activities within the protective buffers shall be prohibited until the nesting season has concluded and young have fully fledged, unless otherwise modified and authorized by CDFW in writing. 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.

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 CNDDB. The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist Contra Costa County Department of Conservation and Development in identifying and mitigating Project impacts on biological resources.

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 (916) 531-4465 or Sara.Kern@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77F9A6211EF486

Erin Chappell
Regional Manager
Bay Delta Region

cc: Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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