Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

January 13, 2026

Julie Casagrande, Natural Resource Manager
County of San Mateo Department of Public Works
555 County Center 5th Floor
Redwood City, CA 94603
DPW_CEQA_Comments@smcgov.org

Subject: Entrada Way Culvert Slip-out Bank Stabilization Project, Mitigated Negative Declaration, SCH No. 2025120514, San Mateo County

Dear Julie Casagrande:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from San Mateo County Department of Public Works (County) for the Entrada Way Culvert Slip-out Bank Stabilization 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.

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

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.

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA or Native Plant Protection Act (NPPA), either during construction or over the life of the Project. Under CESA, take is defined as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill." Issuance of an ITP is subject to CEQA documentation. If the Project will impact CESA or NPPA listed species, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. Fully protected species may not be taken or possessed at any time (Fish and Game Code, §§ 3511, 4700, 5050, and 5515).

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially impact threatened or endangered species (Pub. Resources Code, §§ 21001(c), 21083, and 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 Fish and Game Code, § 2080 et. seq.

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 hydraulic directional drilling, is also generally 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

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

responsible agency under CEQA, will consider the MND for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA as the Responsible Agency.

Raptors and Other Nesting Birds

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

Fully Protected Species

Fully protected species, such as San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) 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.

PROJECT DESCRIPTION SUMMARY

Proponent: San Mateo County Department of Public Works

Objective: The Proposed Project involves a biotechnical approach to stabilize and repair the left bank of La Honda Creek directly upstream (north) from Entrada Way in the unincorporated community of La Honda in San Mateo County, California. The bank failure threatens existing infrastructure, including stormwater infrastructure, the Entrada Way roadway, and overhead utility poles located at the top of the bank. The Proposed Project includes construction of an engineered log structure (cribwall) along the lower

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

bank with vegetated soil lifts (VSLs) on the upper slopes above the cribwall. The existing culvert headwall parallel to the roadway would be extended approximately 22 linear feet (LF) toward the left bank. The Proposed Project also includes repositioning the creek thalweg to its original pre-erosional alignment away from the left bank and closer to the center of the channel in line with the culvert. Other Project activities include realignment of an associated storm drainpipe to discharge downstream of Entrada Way and minor roadway improvements.

Location: La Honda, San Mateo County, at the cross between Entrada Way and La Honda Road, and Latitude 37.318984, Longitude -122.273702.

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.

I. Project Description and Related Impact Shortcoming

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 U.S. Fish and Wildlife (USFWS)?

COMMENT 1: Bats

Section 3.4, Page 3-47

Issue: The MND states that "suitable habitat is present in the Project area for Townsend's big-eared bat," though "adequate roosting sites were not observed in the Project area" and "it is unlikely this species would be roosting in the vicinity of the Project area." A Biological Resources Report for the Project prepared by Montrose Environmental provides information that it is possible for Townsend's big-eared bat (*Corynorhinus townsendii*) to occur in the Study Area, and that the species "may forage in Study Area or roost in structures in or adjacent."

The MND does not include sufficient measures to avoid, minimize, and mitigate impacts to bats in general, and if roosting or foraging bats are present, Project activities could directly or indirectly impact bats during vegetation removal, ground disturbance, or other noise generating activities, a potentially significant impact under CEQA.

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

Specific impact, why impact would occur, and evidence impact would be significant: Townsend's big-eared bat are a California Species of Special Concern. Bats, including Townsend's big-eared bat, play an important role in Bay Area ecosystems, through pest control, pollination and seed dispersal. Recent studies estimate that bat consumption of insect pests results in more than $3 billion in agricultural production savings per year in the U.S. (USFWS 2025). Bats are known to roost under bridges, in caves and mines, on buildings, in cliff crevices, in tree foliage, bark, and hollows, and in riprap, with habitat use varying temporally and seasonally. Suitability of bat roosting habitat is dependent on temperature, protection from predators and inclement weather, and proximity to foraging sites. Habitat reduction and disruption of hibernation and maternity roosts due to human development and activity have contributed to steep population declines in California and across the globe. Many bat species are long lived, with most females birthing only one to two young per year. Due to low reproductive rates and sensitivity of breeding females to disruption, maternity colonies affected by human activities that temporarily reduce fecundity or mortality may require multiple years to recover following disturbance events (Caltrans 2019).

While no bats were observed on the biological reconnaissance survey performed by Montrose Environmental on December 4, 2024, it is possible Townsend's big-eared bats may forage in the Project area or roost in structures within or adjacent to the Project. And while occurrence of breeding roosts in the Project vicinity is unlikely due to the proximity of the Project to roadways, riparian trees in and adjacent to the Project area could provide non-breeding roost habitat for this species. If bats are roosting in trees slated for removal, or in structures or vegetation near areas proposed for construction, eviction from roosts or excessive noise could impact this special-status species, a potentially significant impact under CEQA.

Recommendation 1: CDFW recommends Measure BIO-14 be updated to include the following details to reduce potentially significant impacts to bats to a less-than-significant level:

Recommended Bat Mitigation Measure: Pre-construction surveys for special-status and non-listed bat species shall be performed by a qualified biologist if any trees are to be removed, or underutilized or vacant buildings are to be demolished, or if any suitable habitat including buildings, trees, rock outcrops, bridges, or culverts are present within 100 feet of proposed construction. If any active maternity or hibernation roosts are identified within 100 feet of areas proposed for development, an agency-approved qualified biologist shall establish site-specific protective buffers around roosts, sized with consideration for the species that are present and the time of year bats are roosting, as well as levels of construction noise and light emission from Project activities.

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

If bats are identified during pre-construction surveys and are roosting in vegetation slated for removal or within structures that will be demolished, CDFW shall be consulted. Any removal of trees shall occur after a qualified biologist confirms day roosting bats are not present. Tree removal shall be phased; where selected limbs and branches not containing cavities are removed using hand equipment on the first day, with the remainder of the tree removed using chainsaws or other equipment the second day. Trees and structures supporting day roosting bats shall not be removed until the lead agency consults with CDFW and receives written confirmation that project activities may proceed.

COMMENT 2: Roadway Drainage

Section 3.4, Page 3-45 and Section 3.10, Page 3-92

Issue: The MND describes installation of a storm drainpipe that would discharge stormwater from Entrada Way to La Honda Creek downstream of the roadway. While the Project would include Best Management Practices (BMPs) during construction to reduce the potential for erosion and hazardous material spills, as well as provisions for excluding uncured concrete from the stream, the Project has potential to cause significant impacts to salmonids and/or other aquatic life from impacts to water quality from polluted road run-off.

Specific impact, why impact would occur, and evidence impact would be significant: La Honda Creek may provide suitable habitat for Coho salmon (*Oncorhynchus kisutch*) – central California coast Evolutionarily Significant Units (ESU), an endangered species under the California Endangered Species Act (CESA). Though no Coho salmon were observed during surveys conducted between 1950 to 1997, La Honda Creek is designated critical habitat for Coho salmon, and ongoing stream restoration efforts in the watershed may aid this species' recovery. Steelhead (*Oncorhynchus mykiss)* – central California coast ESU, listed as threatened under the federal Endangered Species Act (ESA), are known to occur in La Honda Creek, which is designated critical steelhead habitat and is one of the principal steelhead creeks in the County.

Recent studies out of the Pacific Northwest have described significant mortality (92 percent - 100 percent mortality) of juvenile and adult Coho salmon when exposed to roadway runoff, even when runoff was diluted by as much as 95 percent clean water (French et al. 2022). Steelhead trout juvenile and adult mortality occurs at intermediate levels (4 percent - 42 percent mortality) when trout are exposed to undiluted roadway runoff. Severe urban runoff mortality syndrome in salmonids is primarily caused by exposure to the chemical 6PPD-quinone, which is derived from vehicle tires and therefore ubiquitous in roadway runoff. Urban runoff mortality syndrome is characterized by progression of behavioral symptoms in affected fish,

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

including circular surface swimming and gaping, a loss of equilibrium, immobility and ultimately death (Scholtz et al. 2011, Chow et al. 2019). Stormwater-driven die-offs pose a significant threat to near-term and long-term efforts to conserve wild salmonid populations.

The MND states that "the proposed Project would not impact water quality over the long-term" (page 3-94), though the Project describes installation of roadway stormwater conveyance structures, including a new asphalt dike along the north side of the roadway adjacent to the creek bank stabilization measures, a 12-inch drop inlet into a 24-inch HDPE pipe underneath the roadway, and a new outfall with a crushed rock and larger boulder stone apron on the south side of the roadway. The apparatus would convey stormwater directly from the roadway into La Honda Creek, without applying any methods to filter runoff of roadway pollutants before stormwater enters the creek.

Though untreated roadway runoff is generally lethal to salmonids, acute mortality is diminished if not eliminated when runoff is filtered through bioretention soil media (McIntyre et al. 2015). Bioretention involves the use of shallow landscaped depressions integrated into sites at small scales, are designed to mimic the soil structure and vegetation of native habitat, and promote the infiltration, storage, filtration, and slow release of stormwater flows (Washington Department of Ecology, 2024). Bioretention is a relatively inexpensive, readily transferable green infrastructure approach to treating polluted runoff, and proves effective in reducing severe urban runoff mortality syndrome in salmonids (McIntyre et al. 2023).

Steelhead trout and Coho salmon are federally listed as threatened and CESA-listed as endangered species, respectively, and therefore are threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if steelhead or coho are injured or killed, or the quality of their habitat diminished 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).

Recommendation 2: CDFW recommends the MND include additional analysis on the potential impacts of road runoff and the Project's stormwater discharge on stream health. CDFW also recommends the MND include the following mitigation measure to reduce potentially significant impacts to Coho salmon and steelhead to less-than-significant levels:

Recommended Roadway Drainage Measure: The Project shall not allow unfiltered runoff from roadways to enter any salmonid-bearing streams. The Project shall incorporate methods to slow, spread, and sink road runoff prior to discharging into

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

any streams. Runoff treatment may include constructing bioretention basins of sufficient size for the drainage catchment area and may be created using a drainage layer of gravel aggregate overlain by local bioretention soil media comprised of sand and compost, topped with mulched bark, and planted with native perennial and herbaceous flowering plants, shrubs, and/or trees. The Project shall monitor the effectiveness of the selected runoff treatment method and shall establish success criteria and incorporate monitoring timelines.

II. Environmental Setting and Related Impact Shortcoming

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 3: Baseline Conditions and Potential Cumulative Impacts

Issue: The Project aims to correct streambank erosion upstream of a culvert under Entrada Way by constructing a log crib-wall and VSLs along the eroding streambank. CDFW appreciates that the Project proposes a bio-technical design which will avoid or minimize use of hard-scape materials such as boulders or concrete. However, work will require La Honda Creek to be temporarily dewatered and diverted to allow operation of heavy equipment on the creek bed and banks. An existing culvert at the Project location may be contributing to streambank erosion via channel constriction, resulting in changes to natural stream processes such as partially obstructed streamflow, sediment deposition at the inlet, and movement of the channel thalweg toward the left bank.

Although the MND includes avoidance and minimization measures to reduce the impacts of work activities, the MND does not disclose if the culvert is contributing to streambank erosion or if recurring channel re-alignment work will be needed. The description of the environmental setting establishing baseline physical conditions at the Project site is therefore insufficient because it does not consider existing geological and hydrological conditions related to the existing culvert, nor does it provide analysis of the Project's potentially significant impacts on the environment due to cumulative impacts that may occur if repeat disturbance is required.

Specific impact, why impact would occur, and evidence impact would be significant:

CEQA Guidelines section 15130 describes cumulative impacts as impacts that are created as a result of the combination of the project with other projects causing related impacts, and discussion should be guided by practicable and reasonable standards. Adequate discussion of cumulative impacts should include a list of past,

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

present, and probable future projects producing related or cumulative impacts, a summary of expected environmental effects to be produced by those projects, and a reasonable analysis of the cumulative impacts of the relevant projects, along with feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Per CEQA Guidelines section 15063 (a)(d), the lead agency shall conduct an initial study to determine if a project may have a significant effect on the environment, and the initial study shall contain an identification of the environmental setting. CEQA Guidelines section 15125 (a) identifies the environmental setting as 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.

Recommendation 3: CDFW recommends the MND include a more complete description of the Project's environmental setting, which should address the baseline hydrological and geologic conditions that have contributed to streambank erosion at the Project site. Consideration of the effects of the culvert on streamflow should be included when establishing baseline conditions.

Once baseline environmental conditions are adequately described in the MND, the County should identify whether there exists reasonably foreseeable potential for future streambank modifications at the Project location and discuss the cumulative impacts of the Project and potential future projects. The discussion of cumulative impacts should include feasible options for mitigating or avoiding the Project's contribution to any significant cumulative impacts on habitat quality and quantity in the stream. The MND should describe possible project alternatives which may address the root cause of streambank erosion at the Project site and which could preclude the need for future modifications to the stream bed, banks or channel. Alternatives to address the issue of streambank erosion upstream of the culvert may include upsizing the existing culvert or replacing it with a free span bridge.

The CDFW Fisheries Restoration Grant Program (FRGP) (https://wildlife.ca.gov/Grants/FRGP) funds a wide range of projects that focus on, or lead to, restoring, enhancing, or protecting salmonid habitat in anadromous watersheds of California. The County may consider contacting the FRGP to determine if funding for any of the Project alternatives identified in the MND is available.

ENVIRONMENTAL DATA

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

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 (CNDDB). The CNDDB 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 MND to assist the County 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 (SCH No. 2025120514)

REFERENCES

B. F. French, D. H. Baldwin, J. Cameron, J. Prat, K. King, J. W. Davis, J. K. McIntyre, and N. L. Scholz. 2022. Urban Roadway Runoff Is Lethal to Juvenile Coho,

Docusign Envelope ID: 54CDDEE6-7F0D-49F5-AFF6-98D6E6B5ED4A

Steelhead, and Chinook Salmonids, But Not Congeneric Sockeye. Environmental Science & Technology Letters 2022 9 (9), 733-738. DOI: 10.1021/acs.estlett.2c00467.

California Department of Transportation. 2019. Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions.

J.K. McIntyre, J.W. Davis, C. Hinman, K.H. Macneale, B.F. Anulacion, N.L. Scholz, J.D. Stark. 2015. Soil bioretention protects juvenile salmon and their prey from the toxic impacts of urban stormwater runoff. Chemosphere, Volume 132, 2015, Pages 213-219. ISSN 0045-6535. https://doi.org/10.1016/j.chemosphere.2014.12.052.

J.K. McIntyre, J. Spromberg, J. Cameron, J.P. Incardona, J.W. Davis, N.L. Scholz. 2023. Bioretention filtration prevents acute mortality and reduces chronic toxicity for early life stage coho salmon (Oncorhynchus kisutch) episodically exposed to urban stormwater runoff. Science of The Total Environment, Volume 902, 2023, 165759, ISSN 0048-9697, https://doi.org/10.1016/j.scitotenv.2023.165759.

M.I. Chow, J.I. Lundin, C.J. Mitchell, J.W. Davis, G. Young, N.L. Scholz, J.K. McIntyre. 2019. An urban stormwater runoff mortality syndrome in juvenile coho salmon. Aquatic Toxicology, Volume 214, 2019, 105231, ISSN 0166-445X. https://doi.org/10.1016/j.aquatox.2019.105231.

N.L. Scholz, M.S. Myers, S.G. McCarthy, J.S. Labenia, J.K. McIntyre, G.M. Ylitalo, L.D. Rhodes, C.A. Laetz, C.M. Stehr, B.L. French, B. McMillan, D. Wilson, L. Reed, K.D. Lynch, S. Damm, J.W. Davis, T.K. Collier. 2011. Recurrent Die-Offs of Adult Coho Salmon Returning to Spawn in Puget Sound Lowland Urban Streams. https://doi.org/10.1371/journal.pone.0028013.

Washington Department of Ecology. 2024 Stormwater Management Manual for Western Washington. Volume 5. https://apps.ecology.wa.gov/publications/documents/2410013.pdf.