STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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February 25, 2026

Kristin Prathivadi, Project Manager
Mid-Coastside Sewer Authority
1000 N Cabrillo Highway
Half Moon Bay, CA, 94019
Kishen@samcleanswater.org

Dear Kristin Prathivadi:

Subject: SAM Force Main in Montara Replacement Project, Mitigated Negative Declaration, SCH No. 2026010972, San Mateo County

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from Mid-Coastside Sewer Authority for the SAM Force Main in Montara Replacement 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.

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,

[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.

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 & G. 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.

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*, SFGS) 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: Mid-Coastside Sewer Authority

Objective: The Project is proposed for a sewer force main replacement along the alignment of the existing Intertie Pipeline System (IPS). The Project is proposed by the Sewer Authority Mid-Coastside (SAM) and includes the construction of a sewer force main segment, starting within the boundaries of the Montara Water and Sewer District along California Department of Transportation (Caltrans) State Route 1 (SR-1) with a proposed length of approximately 13,540 feet. An existing 8-inch diameter Princeton force main connects to the Project force main approximately 200 feet southwest of Coral Reef Avenue. The Project will relocate this connection to the intersection of Coral Reef Avenue and SR-1 to avoid the requirement to work to connect the pipelines in sensitive environmental habitats. The Project site is primarily developed along the paved road and open space.

Location: Neighborhood of Miramar, Village of El Granada, and the census-designated place of Moss Beach, San Mateo County, cross streets Sonora Avenue and SR-1, Latitude 37.515915, Longitude -122.497055.

Timeframe: Field construction activities for the Project are scheduled to be completed following regulatory and right-of-way permitting over a single continuous period beginning in the summer of 2026 and ending in the summer of 2027.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Mid-Coastside Sewer Authority 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 Service (USFWS)?

COMMENT 1: California Red-Legged Frog and San Francisco Garter Snake

Section BIO-1, Page 41

Issue 1: The Project area is within the close vicinity of documented California Natural Diversity Database (CNDDB) occurrences of California red-legged frog (*Rana draytonii,* CRLF) and SFGS including along San Vincente and Denniston Creeks and within riparian areas, wetlands, upland coastal scrub and coastal prairie, and annual grasslands. The MND acknowledges observed presence of CRLF within the Project area and identifies suitable habitat for these species throughout the Project alignment. Additionally, the Project MND provides a "Summary of Jurisdictional Waters and Streambeds Within the Project Site" in Table 5.22.

CDFW appreciates the Project proposes to avoid or minimize impacts to wetlands and riparian areas by Horizontal Directional Drilling (HDD). However, the MND does not fully contemplate potentially significant impacts to CRLF and SFGS with respect to impacts to their habitat near wetlands and riparian areas or clearly describe if and how temporarily impacted habitat will be restored. While BIO-1 and BIO-2 include measures that can help minimize impacts to CRLF and SFGS, such as providing worker awareness trainings to train all construction personnel in identifying CRLF and SFGS (and other sensitive species), the measures would not ensure potentially significant impacts to CRLF and SFGS from habitat loss will be reduced to less-than-significant levels.

Issue 2: According to the MND, operational activities for the proposed facilities include operating, exercising isolation valves, maintaining air release valves, and general upkeep and maintenance of accessible facilities. CDFW does not have enough Project information to understand if potentially significant impacts may occur to CRLF and/or SFGS individuals or their habitat during ongoing operations and maintenance of the Project. For instance, vegetation clearing and mowing in potentially suitable habitat, particularly in the vicinity of San Vincente Creek and Denniston Creek, could result in take of SFGS if sufficient avoidance measures are not implemented.

Specific impact, why impact would occur, and evidence impact would be significant: CRLF is a species listed as threatened under the federal Endangered Species Act (ESA) and is a California Species of Special Concern (SSC), and SFGS is a State Fully Protected species and listed as endangered under CESA and the federal ESA. CRLF and SFGS

require a variety of habitats, including aquatic breeding habitat and upland dispersal habitat.

CRLF breeding sites occur in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons. (USFWS 2002). Upland dispersal habitat includes nearly any area within one to two miles of a breeding site that stays moist and cool through the summer, such as aquatic habitat in pools of slow-moving streams, perennial or ephemeral ponds, and sheltering habitat in and amongst rocks, small mammal burrows, logs, densely vegetated areas, and even man-made structures (i.e., culverts, livestock troughs, spring-boxes, and abandoned sheds) (USFWS 2017). CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, mining, overgrazing by cattle, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators such as bullfrogs are the primary threats to the species (Thomson et al. 2016, USFWS 2017).

SFGS are endemic snakes with a highly limited range in the San Francisco Peninsula. They utilize a variety of habitats including upland sites for basking, rodent burrows for shelter and low-lying marsh for feeding and reproduction (USFWS 1985). In coastal areas, SFGS may hibernate during the winter in small mammal burrows (USFWS, 2007). SFGS are threatened by loss of habitat from agricultural, commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, CRLF.

CRLF and SFGS 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 CRLF or SFGS 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).

Recommendation 1: To avoid potentially significant impacts to CRLF and/or SFGS, ground disturbing construction activities should be avoided in and around wetlands, riparian and other aquatic habitat within the Project alignment. Additionally, CDFW recommends the MND discuss the potential need for vegetation removal and pipeline access in areas with suitable CRLF and SFGS habitat as a part of ongoing operation and maintenance of the sewer line. If the Project will temporarily impact suitable SFGS and/or CRLF habitat the MND should indicate if those habitats will be restored to baseline conditions and include a timeframe for completing restoration. If Project construction and/or maintenance activities will result in significant temporary and/or permanent impacts to CRLF and SFGS habitat, compensatory mitigation should be provided to reduce impacts to a less-than-significant threshold.

CDFW recommends Mitigation Measure BIO-9 Sensitive Natural Communities/Environmentally Sensitive Habitat Areas be updated to include both upland and aquatic habitat for CRLF and SFGS, as follows:

> If avoidance of sensitive natural communities and/or habitat used by CRLF or SFGS is not feasible, the applicant shall prepare and implement a restoration and/or compensatory mitigation plan, in consultation with the California Department of Fish and Wildlife, to ensure no net loss of sensitive natural community or special-status species habitat functions or values. The plan may include measures such as replanting with locally appropriate native species, habitat restoration, or off-site conservation at a minimum 1:1 ratio.

Recommendation 2: If take of SFGS cannot be avoided, the Project may be eligible for a take permit via Fish and Game Code §2081.15. Project proponents are encouraged to consult with CDFW early in the Project planning process if take of SFGS may occur.

Recommendation 3: CDFW recommends Mitigation Measure BIO-2, Worker Awareness Training, provision for language accommodations for construction personnel that may have primary languages other than English. Further, CDFW recommends the MND incorporate the following mitigation measures, in addition to BIO-1, to ensure that impacts to CRLF and SFGS are fully avoided:

Recommended SFGS Mitigation Measure: Prior to any project mowing or riparian or wetland vegetation removal activities, a SFGS avoidance plan shall be prepared for implementation in coordination with CDFW. The SFGS avoidance plan shall be prepared by a qualified biologist experienced in the natural life history requirements of SFGS. At a minimum the SFGS avoidance plan shall include the following elements, to be implemented during Project construction and ongoing operations and maintenance:

- Depict locations of mowing and vegetation removal with respect to grasslands, wetlands, riparian vegetation and dense vegetation surrounding any aquatic resources on a map. Create habitat buffers and avoid mowing and vegetation clearing in areas that are sensitive or have increased potential for SFGS presence such as dense wetland vegetation areas.
- Require a biological monitor on-site proficient in SFGS identification to walk ahead of the mower/vegetation remover if any mowing or vegetation removal occurs in potentially suitable habitat during the months February through November.
- Avoid mowing and vegetation removal during peak active SFGS periods to the greatest extent feasible. SFGS are less active and often underground during late fall to early spring months.
- Increase mowing blade heights to cut grass as high as possible (i.e. eight inches).
- Utilize hand clearing of vegetation wherever feasible.
- Limit mowing speed to a sufficiently slow rate to allow any undetected SFGS to leave on its own volition unharmed.
- Limit speed of all vehicles operated adjacent to potentially suitable aquatic and upland habitat, including access roads, to a maximum of 10 miles per hour. If focused surveys confirm presence of SFGS in the Project area, then a qualified biologist shall walk ahead of vehicles in areas with confirmed SFGS presence, to prevent take of basking SFGS by vehicles.

If any CRLF or SFGS take occurs or if either of these species are detected, CDFW shall be contacted immediately, and location information and photo documentation of the individual(s) shall be provided.

COMMENT 2: Western Bumble Bee and Crotch's Bumble Bee

Section BIO-7, Page 45

Issue: While the MND includes analysis on the potential for the Project to impact Western bumble bee (*Bombus occidentalis,* WBB), it does not identify potential impacts to Crotch's bumble bee (*Bombus crotchii*, CBB). The current range of CBB encompasses the proposed Project area, and proposed Project activities as described in the MND could impact CBB as well as WBB if they are present on-site. The MND includes Mitigation

Measure BIO-7 to reduce potentially significant impacts to WBB to less-than-significant levels, but, as it is currently written, the measure is insufficient to reduce potentially significant impacts to CBB and WBB to less-than-significant levels, because the measure does not include CBB, and the measure would only be enacted "if the western bumble bee is listed prior to project implementation" (page 45).

Specific impacts, why they may occur and be potentially significant: CBB and WBB are listed as candidate endangered species under CESA and are afforded the same protections as CESA-listed endangered species. Project activities as described in the MND would include ground disturbance and impacts to vegetation within a large area. Bumble bees, including CBB and WBB, are found in a wide variety of natural, agricultural, urban and rural habitats, and require suitable nesting and overwintering sites as well as availability of nectar and pollen from floral resources (Hatfield et al. 2018). Bumble bee nests are most often located underground in abandoned holes made by ground squirrels and rodents, and occasionally in abandoned bird nests. Any near-surface or subsurface ground disturbance could result in the direct take of bumble bee colonies or overwintering queens.

Many bumble bee species, once common in the western United States, have undergone a dramatic decline in both distribution and abundance and are now extirpated from much of their historic ranges. Many bumble bees, including CBB and WBB, are threatened with extinction due primarily to reductions in habitat from urbanization, intensive agriculture, and invasive species introductions. Several plant communities are found in the Project area, including coastal scrub, coastal prairie, annual grassland, ornamental, agricultural areas and wild strawberry, each of which provide bumble bee habitat. CBB and WBB are generalist foragers, and do not depend on any one flower type, often visiting native and non-native flowering plants alike to collect the pollen and nectar resources needed to sustain their colonies and provision nest cells. Project activities would involve removal of flowering plants present on-site as a part of the extensive ground disturbance, thus potentially impacting bumble bee foraging and nesting/overwintering habitat.

CBB and WBB are candidate species under CESA and therefore should be considered a threatened, endangered, or rare species under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if CBB or WBB occur at the Project site and Project impacts to CBB and/or WBB would occur, this may result in a substantial reduction in the species' population, which would be a mandatory finding of significance (CEQA Guidelines, § 15065).

Recommendation 3: CDFW recommends replacing BIO-7 with the following mitigation measures to reduce potentially significant impacts to CBB and WBB to less-than-significant levels:

Crotch's Bumble Bee and Western Bumble Bee Habitat Assessment

Prior to Project operations, a thorough habitat assessment for CBB and WBB shall be performed within the Project area and surrounding areas that may be impacted by Project construction and operations. The assessment shall be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of CBB and WBB, and include all areas of suitable overwintering, nesting, and foraging habitats.

Suitable habitat includes areas of grasslands and upland scrub that contain requisite habitat elements such as small mammal burrows and forage plants. Potential nest habitat (late February to late October) could contain underground abandoned small mammal burrows, perennial bunch grasses and/or thatched annual grasses, brush piles, old bird nests, dead trees, or hollow logs. Overwintering sites (November through early February) utilized by mated queens in self-excavated hibernacula could be

present in soft, disturbed soil, sand, well-drained, or loose soils, under leaf litter or other debris with ground cover requisites such as barren areas, tree litter, bare patches within short grass in areas lacking dense vegetation.

Crotch's Bumble Bee and Western Bumble Bee Surveys

Pre-construction surveys for CBB and WBB shall be conducted within the Project area and surrounding areas which may be impacted by Project construction and/or operations. Surveys shall follow the guidance outlined in the California Bumble Bee Atlas Habitat surveys- Cali Bumble Bee Atlas – California Bumble Bee Atlas (https://www.cabumblebeeatlas.org/habitat-surveys.html).

The peak flying time for CBB is March to August, but bees could be flying any time between February 1 and October 31. Surveys between March and June are expected to have highest detection probability and are therefore the period recommended for pre-construction surveys. Surveys shall be conducted no more than 30 days prior to start of Project construction activities, assessing all areas of suitable habitat for overwintering, nesting, and foraging at and within 100 feet of the proposed work area. Surveys shall include a minimum of 3 survey efforts, over a 3-day period within a temperature range of 15 degrees Celsius and 30 degrees Celsius, although bumble bees can fly and forage at near freezing temperatures. If the qualified biologist suspects CBB and/or WBB detection or occupancy, CDFW shall be consulted immediately.

Goals of the surveys shall be to identify bumble bee species through non-take methods (close lens photography), foraging plants, and potential ground nest sites on-site. Surveys shall include examining flowering vegetation, any potential preferred nectar plants, small mammal burrows, bunch grasses, thatch, brush piles, old bird nests, dead trees, or hollow logs. Survey results shall be applicable for one year (until the next flying period season).

Avoidance of Crotch's Bumble Bee and Western Bumble Bee Nesting Colonies

Inactive small mammal burrows and thatched/bunch grasses shall be avoided whenever feasible. If an inactive burrow may be disturbed by Project activities, it shall be resurveyed for CBB and/or WBB presence within seven days prior to the scheduled disturbance. If CBB and/or WBB have been detected during surveys, the qualified entomologist shall identify the location of all nests in or adjacent to the Project site. If nests are identified, 45-foot no-disturbance buffer zones shall be established around nests to reduce the risk of disturbance or accidental take. If Project activities may result in disturbance or potential take, the qualified entomologist shall expand the buffer zone as necessary to prevent disturbance or take.

Crotch's Bumble Bee and Western Bumble Bee Take Authorization

If surveys document presence of CBB and/or WBB within the Project area, due to the difficulty of completely avoiding take of individuals of the species, the Project proponent shall apply for an ITP under CESA to provide take authorization for CBB and/or WBB as a covered species.

Crotch's Bumble Bee and Western Bumble Bee Compensatory Mitigation

The Project shall include compensatory mitigation for the loss of all suitable CBB and/or WBB habitat. Bumble bee floral resources should be mitigated at a 3:1 ratio for permanent impacts, in consultation with CDFW. Floral resources shall be replaced as close to their original location as feasible and shall include a palette of native flowering plants adapted to the area in which they are planted. If active CBB and/or WBB nests have been identified and floral resources cannot be replaced within 600

feet of their original location, floral resources shall be planted in the most centrally available location relative to identified nests. This location shall be no more than 4,900 feet (1.5-kilometers) from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests.

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 3: Horizontal Directional Drilling

Section BIO-11, Page 49

Issue: The MND identifies 3.234 acres of "CDFW jurisdictional streambeds" within the Project site, and though the "current project design anticipates avoiding jurisdictional wetlands and waters within the Project alignment by utilizing HDD under the jurisdictional areas" (page 48), the mitigation measures included in the MND are insufficient to reduce potentially significant impacts on riparian habitat and other sensitive natural communities to less-than-significant levels. Mitigation Measure BIO-11 provisions for acquisition of permits from regulatory agencies if impacts to jurisdictional aquatic features would occur, and states that only "if impacts to riparian vegetation occur, the Construction Contractor should retain a qualified biologist to coordinate with the California Department of Fish and Wildlife (CDFW) to obtain a Streambed Alteration Agreement" (page 49).

The mitigation measures included in the MND do not state whether CDFW would be notified per California Fish and Game Code section 1602 to obtain an LSA Agreement for Project activities involving HDD under riparian habitat and stream channels. Further, the mitigation measures in the MND do not address the specific risks HDD could pose when used near sensitive aquatic habitats, and as such do not reduce potentially significant impacts to riparian habitat and other sensitive natural communities to less-than-significant levels.

Specific impact, why impact would occur, and evidence impact would be significant: HDD is a common trenchless technique used to install utility crossings under watercourses, which utilizes a steerable drill bit to bore a shallow arc beneath the overlying obstacle and requires the circulation of a drilling fluid to remove rock and soil cuttings and keep the bore open. Once the initial bore or pilot hole is completed, the pilot hole can be enlarged, or the conduit can be pulled back through the bore to the starting location. HDD is advantageous because it can be used beneath the water table, in hard rock conditions, and for long distances.

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.

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 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 MND for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA as a responsible agency.

Recommendation 4: CDFW recommends including the following mitigation measure to reduce potentially significant impacts of HDD to less-than-significant levels:

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, including use of HDD, affecting streams and associated riparian habitat. 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 a 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.

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 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 Mid-Coastside Sewer Authority 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
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Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Land Use and Climate Innovation SCH No. 2026010972

REFERENCES

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