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DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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August 11, 2020

Jill Miller
Senior Planner
City of Salinas
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Salinas, California 93901
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Subject: City of Salinas Central Area Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
State Clearinghouse No. 2017091022

Dear Ms. Miller:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from City of Salinas for the 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 statue 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.

[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.

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 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.), related authorization as provided by the Fish and Game Code may be required.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Salinas; Hugh Bikle; Thrust IV, Inc.

Objective: The objective of the Project is to establish land use planning and regulatory guidance for the Project area which is approximately 760-acres. Primary Project activities include using the principles of New Urbanism and Traditional Neighborhood Development also known as village-style development. It is a comprehensive planning system that includes a variety of housing types and land uses in a defined area. The Project will serve as a bridge between the Salinas General Plan and individual development applications in the Project area.

Location: The majority of the Project is located within the incorporated boundary of the City of Salinas. The Specific Plan Area is bounded by Natividad Road on the west, East Boronda Road on the south, Old Stage Road and the future extension of Constitutional Boulevard on the east, and the future extension of Russell Road on the north. U.S. 101 and North Main Street are located to the west. Unincorporated land under the jurisdiction of the County of Monterey abuts the Specific Plan Area to the north.

Timeframe: Unspecified

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City of Salinas 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.

There are many special-status resources present in and adjacent to the Project area. These resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities or land use changes. The DEIR indicates there

is potential significant impact unless mitigation measures are taken but the measures listed are general and may be inadequate to reduce impacts to less than significant. CDFW is concerned regarding potential impacts to special-status species including, but not limited to: the State and federally threatened California tiger salamander (*Ambystoma californiense*), the State endangered foothill yellow-legged frog (*Rana boylii*), the federally threatened California red-legged frog (*Rana draytonii*),the State threatened Swainson's hawk (*Buteo swainsoni*), the State species of special concern burrowing owl (*Athene cunicularia*), western spadefoot (*Spea hammondii*), and special-status plants, including the State endangered Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*). In order to adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, especially in the areas not in irrigated agriculture, and to identify any Project-related impacts under CESA and other species of concern.

I. Environmental Setting and Related Impact

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 the United States Fish and Wildlife Service (USFWS)?

COMMENT 1: California Tiger Salamander (CTS)

Issue: The DEIR states the Project has the potential to significantly impact CTS. A 0.25-acre agricultural basin may provide potential breeding habitat for CTS and remnant upland habitat features and/or small mammal burrows may provide refugia for CTS dispersing from or into the Project area. Mitigation Measure 3.2-2 states that a biologist with a scientific colleting permit (SCP) shall oversee the excavation of burrows, inspect exclusion fencing, and relocate any CTS found on the Project site. However, SCPs cannot be used to mitigate project impacts. If a biologist were to conduct the activities as described in the Mitigation Measure, it would violate both the SCP and CESA, resulting in unauthorized take. Fish and Game Code (Fish & G. Code, § 86) defines take as hunt, pursue, catch, capture, or kill, or the attempt to do so. Several of the actions listed in Mitigation Measure 3.2-2 would be defined as take. For example, relocating CTS or if CTS is trapped within an exclusion this constitutes capture. Therefore, acquisition of an Incidental Take Permit (ITP) pursuant to Fish and Game Code section 2081(b), is required to implement these actions and comply with CESA.

Specific Impacts: Potential ground- and vegetation-disturbing activities associated with Project activities include: water inundation as a result of the proposed new reservoir, collapse of small mammal burrows, inadvertent entrapment, loss of upland refugia and breeding sites, water quality impacts to breeding sites, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact would be significant: Up to 75% of historic CTS habitat has been lost to urban and agricultural development (Searcy et al. 2013). The Project site is within the range of CTS and has suitable habitat features. CTS have been determined to be physiologically capable of dispersing up to approximately 1.5 miles from seasonally flooded wetlands (Searcy and Shaffer 2011) and have been documented to occur near the Project site (CDFW 2020). Given the presence of suitable habitat within the Project site, ground-disturbing activities have the potential to significantly impact local populations of CTS.

Recommended Potentially Feasible Mitigation Measure(s)
Because suitable habitat features for CTS are present throughout the Project site, CDFW recommends the following edits to the DEIR prepared for this Project.

Mitigation Measure 3.2-1:
CDFW recommends that a qualified biologist conduct protocol-level surveys in accordance with the USFWS "Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander" (USFWS 2003) at the appropriate time of year to determine the existence and extent of CTS breeding and refugia habitat, and subsequently if CTS are present on or immediately adjacent to the Project site. These surveys will inform what, if any, take authorization is required from CDFW to comply with CESA.

Please note the protocol-level surveys for CTS require more than one survey season and are dependent upon sufficient rainfall to complete. As a result, consultation with CDFW and the USFWS is recommended well in advance of beginning the surveys and prior to any planned vegetation- or ground-disturbing activities. CDFW advises that the protocol-level survey include a 100-foot buffer around the Project area in all areas of wetland and upland habitat that could support CTS. Please be advised that protocol-level survey results are viable for two years after the results are reviewed by CDFW.

Mitigation Measure 3.2-2:
As stated above, several of the actions listed in Mitigation Measure of 3.2-2 require an ITP to ensure compliance with CESA. CDFW recommends changing SCP to ITP throughout the measure to accurately represent what is required to secure the appropriate take authorization of CTS to minimize Project impacts. In addition, if

through surveys it is determined that CTS are occupying or have the potential to occupy the Project site, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization would also be warranted prior to initiating ground-disturbing activities to comply with CESA. Take authorization would occur through issuance of an ITP by CDFW pursuant to Fish and Game Code section 2081(b). In the absence of protocol surveys, the applicant can assume presence of CTS within the Project site and obtain an ITP from CDFW.

COMMENT 2: Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF)

Issue: FYLF are primarily stream dwelling and require shallow, flowing water in streams and rivers with at least some cobble-sized substrate; CRLF primarily inhabit ponds but can also be found in other waterways including marshes, streams, and lagoons, and both species will also breed in ephemeral waters (Thomson et al. 2016). CRLF have been documented to occur in the vicinity of the Project site (CDFW 2020). In the DEIR, it states that there is less than significant impacts to FYLF because there are no documented occurrences in the Project vicinity and there is no potential for the species to occur on the Project site, but also states there are limited habitat features that may be suitable for FYLF. Based on statements provided in the DEIR, it is unclear if FYLF have the potential to occur on or near the Project site. FYLF have been reduced to limited populations in Monterey County and any impact to FYLF that may occur in the Project area is potentially significant.

Specific impact: Without appropriate avoidance and minimization measures for FYLF, potentially significant impacts associated with the Project's activities include burrow collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, loss of habitat, and direct mortality of individuals.

Evidence impact would be significant: FYLF populations throughout their southern range, including Monterey County, have experienced ongoing and drastic declines and many have been extirpated; historically, FYLF occurred in mountain streams from the San Gabriel River in Los Angeles County to southern Oregon west of the Sierra-Cascade crest (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, 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 FYLF (Thomson et al. 2016, USFWS 2017). Project activities have the potential to significantly impact both species.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to FYLF, CDFW recommends the following edits to the DEIR prepared for this Project.

Mitigation Measure 3.2-3
CDFW recommends that a qualified biologist determine if FYLF have the potential to occur in the Project area. If this evaluation has already been completed as part of the determination that FYLF cannot occur on the Project site, we recommend that the evaluation is included in the DEIR. If a qualified biologist determines that FYLF have the potential to occur in the Project area, we recommend that this measure is edited to include FYLF in addition to CRLF. The DEIR does not provide the survey method that will be used to determine if CRLF occur in the Project area. CDFW recommends that a qualified wildlife biologist conduct surveys for FYLF and/or CRLF in accordance with the USFWS "Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog" (USFWS 2005) to determine if CRLF and, if warranted, FYLF are within or adjacent to the Project area. While this survey is designed for CRLF, the survey may be used for FYLF with focus on stream/river habitat.

Mitigation Measure 3.2-4
If FYLF are detected during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP is necessary to comply with CESA. Please note that several of the actions required by Mitigation Measure 3.2-4 would be considered take as described above for Mitigation Measure 3.2-2. Therefore, an ITP is required to implement those actions for FYLF. CRLF are not listed pursuant to CESA, and therefore, no ITP is necessary from CDFW for this species.

COMMENT 3: Swainson's Hawk (SWHA)

Issue: SWHA have been documented in the Project vicinity (CDFW 2020) and have the potential to forage and/or nest near or on the Project site. In addition to annual grasslands, SWHA are known to forage in alfalfa, fallow fields, dry-land and irrigated pasture, rice land (during the non-flooded period), cereal grain crops (including corn after harvest), beet, tomato, and other low-growing row or field crops. The DEIR states that there is potential nesting habitat for SWHA near the Project area, but no mitigation measures are provided for this species and the actions listed in Mitigation Measure 3.2-6 alone are unlikely to reduce impacts to less than significant if SHWA are present.

Specific impacts: Without appropriate avoidance and minimization measures for SWHA, potential significant impacts that may result from Project activities include

nest abandonment, loss of nest trees, loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), and direct mortality. Any take of SWHA without appropriate incidental take authorization would be a violation of Fish and Game Code.

Evidence impact is potentially significant: The Project as proposed will involve noise, groundwork, and movement of workers that could affect nests and has the potential to result in nest abandonment, significantly impacting any nesting SWHA occurring near the Project site.

Recommended Potentially Feasible Mitigation Measure(s)
Because suitable habitat for SWHA is present throughout the Project site, CDFW recommends adding these additional measures to the DEIR and that these measures be made conditions of approval for the Project. Alternatively, these measures may be incorporated into Mitigation Measure 3.2-6.

Recommended New Mitigation Measure 1: SWHA Surveys
To evaluate potential impacts, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting SWHA following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC, 2000) prior to project implementation. The survey protocol includes early season surveys to assist the project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites prior to initiating ground-disturbing activities.

Recommended New Mitigation Measure 2: SWHA No-disturbance Buffer
If ground-disturbing Project activities are to take place during the normal bird breeding season (March 1 through September 15), CDFW recommends that additional pre-activity surveys for active nests be conducted by a qualified biologist no more than 10 days prior to the start of Project implementation. While Mitigation Measure 3.2-6 states that a no-disturbance buffer range of 300 feet for an active SWHA nest will be implemented, CDFW recommends a minimum no-disturbance buffer of ½-mile be delineated around active nests until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

Recommended New Mitigation Measure 3: SWHA Foraging Habitat
CDFW recommends compensation for the loss of SWHA foraging habitat to reduce impacts to SWHA foraging habitat to less than significant based on CDFW's Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (CDFG, 1994), which recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites and the amount of habitat compensation is dependent on nest proximity. In addition to fee title acquisition or conservation easement recorded on property with suitable grassland habitat features, mitigation

may occur by the purchase of conservation or suitable agricultural easements. Suitable agricultural easements would include areas limited to production of crops such as alfalfa, dry land and irrigated pasture, and cereal grain crops. Vineyards, orchards, cotton fields, and other dense vegetation do not provide adequate foraging habitat.

Recommended New Mitigation Measure 4: SWHA Take Authorization
CDFW recommends that in the event an active SWHA nest is detected during surveys and the ½-mile no-disturbance buffer around the nest cannot feasibly be implemented, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the issuance of an ITP, pursuant to Fish and Game Code section 2081(b) is necessary to comply with CESA. In addition, compensatory habitat mitigation would be warranted to offset impacts to nesting habitat or habitat utilized by migrating individuals.

COMMENT 4: Burrowing Owl (BUOW)

Issue: BUOW have been documented near the Project site (CDFW 2020). BUOW inhabit open grassland or adjacent canal banks, ROWs, vacant lots, etc., containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Review of aerial imagery indicates that some of the Project site is bordered by annual grassland and potentially fallow agricultural fields and may be present within the Project site. Like SWHA, the actions listed in Mitigation Measure 3.2-6 alone are unlikely to reduce impacts to less than significant.

Specific impact: Potentially significant direct impacts associated with subsequent activities include burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact is potentially significant: BUOW rely on burrow habitat year-round for their survival and reproduction. Therefore, subsequent ground-disturbing activities associated with the Project have the potential to significantly impact local BUOW populations. In addition, and as described in CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), excluding and/or evicting BUOW from their burrows is considered a potentially significant impact under CEQA.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to BUOW, CDFW recommends conducting the following evaluation of the Project site, adding these additional measures to the DEIR, and that these measures be made conditions of approval for the Project. Alternatively, these measures may be incorporated into Mitigation Measure 3.2-6.

Recommended New Mitigation Measure 5: BUOW Surveys
CDFW recommends that a qualified biologist assess if suitable BUOW habitat features are present within or adjacent to the Project site (e.g., burrows). If suitable habitat features are present, CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's (CBOC) "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable.

Recommended New Mitigation Measure 6: BUOW Avoidance
Mitigation Measure 3.2-6 states that a no-disturbance buffer range of 300 feet for an active BUOW nest will be implemented. CDFW recommends no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Recommended New Mitigation Measure 7: BUOW Passive Relocation and Mitigation
If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), exclusion is not a take avoidance, minimization, or mitigation method and is considered a potentially significant impact under CEQA. However, if necessary, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of 1 burrow collapsed to 1 artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting BUOW. BUOW may attempt to colonize or

re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance, at a rate that is sufficient to detect BUOW if they return.

COMMENT 5: Western Spadefoot

Issue: Western spadefoot inhabit grassland habitats, breed in seasonal wetlands, and seek refuge in upland habitat where they occupy burrows outside of the breeding season (Thomson et al. 2016). Western spadefoot has been documented in the Project vicinity and review of aerial imagery indicates that the Project may contain requisite habitat elements (CDFW 2020). The DEIR does not include any species-specific measures for western spadefoot.

Specific impact: Western spadefoot are known to occur in the area (CDFW 2020). Without appropriate avoidance and minimization measures for western spadefoot, potentially significant impacts associated with ground disturbance include; collapse of small mammal burrows, inadvertent entrapment, loss of upland refugia, water quality impacts to breeding sites, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact is potentially significant: Habitat loss and fragmentation resulting from agricultural and urban development is the primary threat to western spadefoot (Thomson et al. 2016). The Project area is within the range of western spadefoot, contains suitable upland habitat, and possible breeding habitat. As a result, ground-disturbing activities associated with development of the Project site have the potential to significantly impact local populations of this species.

Recommended Potentially Feasible Mitigation Measure(s)
To evaluate potential impacts to western spadefoot associated with the Project, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the DEIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended New Mitigation Measure 8: Western Spadefoot Surveys
CDFW recommends that a qualified biologist if requisite habitat features for western spadefoot occurs on the Project site to evaluate potential impacts resulting from ground- and vegetation-disturbance. If suitable habitat is present, CDFW recommends a qualified biologist conduct focused surveys for western spadefoot within the suitable habitat areas.

Recommended New Mitigation Measure 9: Western Spadefoot Avoidance
Within suitable habitat, avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around burrows. If western spadefoot is observed on the Project site, CDFW recommends that Project activities

in their immediate vicinity cease and individuals be allowed to leave the Project site on their own accord. Alternatively, a qualified biologist with appropriate take authorization can move them out of harm's way and to a suitable location.

COMMENT 7: Special-Status plants

Issue: Special-status plant species have been documented to occur in the vicinity of the Project area near the riparian habitats (CDFW 2020). The Project site contains habitat suitable to support numerous special-status plant species meeting the definition of rare or endangered under CEQA Guidelines section 15380. Although the DEIR states that two field surveys were conducted, it does not include the protocol used during plant surveys or disclose if a reference site was used. In addition, it does not compare site conditions when the surveys were conducted (2004, 2015, and 2016) to present conditions. Therefore, CDFW cannot determine if surveys were adequate to detect special-status plant species, if the environmental baseline remains the same, or if mitigation measures listed in the DEIR are sufficient to reduce impacts to less than significant.

Specific impact: Without appropriate avoidance and minimization measures for special-status plants, potential significant impacts resulting from ground- and vegetation-disturbing activities associated with Project construction include inability to reproduce and direct mortality.

Evidence impact would be significant: Special-status plant species known to occur in the vicinity of the Project site are threatened by residential development, road maintenance, vehicles, grazing, trampling, and invasive, non-native plants (CNPS 2020).

Recommended Potentially Feasible Mitigation Measure(s)
Without additional information to evaluate potential impacts to special-status plant species associated with the Project, CDFW recommends conducting the following survey protocol to determine if special-status plants occur in the Project area, editing the DEIR to include the following additional measures if special-status plants are observed in the Project area, and including the following mitigation measures as conditions of approval.

Recommended New Mitigation Measure 10: Special-Status Plant Surveys
Where suitable habitat is present, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities" (CDFW 2018b). This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In

the absence of protocol-level surveys being performed, additional surveys may be necessary.

Recommended New Mitigation Measure 11: Special-Status Plant Avoidance
CDFW recommends that special-status plant species be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

Recommended New Mitigation Measure 12: State-listed Plant Take Authorization
If a plant species listed pursuant to CESA is identified during botanical surveys, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground-disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code section 2081(b).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base 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 found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 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 DEIR to assist City of Salinas in identifying and mitigating Project impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Please see the enclosed Mitigation Monitoring (MMRP) table which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to Aimee Braddock, Environmental Scientist, at aimee.braddock@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Julie Vance
FA83F09FE08945A...

Julie A. Vance
Regional Manager

Attachment

ec: Office of Planning and Research, State Clearinghouse

Aimee Braddock
California Department of Fish and Wildlife

REFERENCES

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: City of Salinas Central Area Specific Plan
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

SCH No.: 2017091022

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Edited Mitigation Measure 3.2-1	
Edited Mitigation Measure 3.2-2	
Edited Mitigation Measure 3.2-3	
Edited Mitigation Measure 3.2-4	
New Mitigation Measure 1: SWHA Surveys	
New Mitigation Measure 2: SWHA No-disturbance Buffer	
New Mitigation Measure 3: SWHA Foraging Habitat	
New Mitigation Measure 4: SWHA Take Authorization	
New Mitigation Measure 5: BUOW Surveys	
New Mitigation Measure 7: BUOW Passive Relocation and Mitigation	
New Mitigation Measure 8: Western Spadefoot Surveys	
New Mitigation Measure 10: Special-Status Plant Surveys	
New Mitigation Measure 12: State-listed Plant Take Authorization	
During Construction	
New Mitigation Measure 6: BUOW Avoidance	
New Mitigation Measure 9: Western Spadefoot Avoidance	
New Mitigation Measure 11: Special-Status Plant Avoidance	