



DEPARTMENT OF PARKS AND RECREATION
Diablo Range District
15751 Tesla Road
Livermore, CA 94550

Armando Quintero, Director

Governor's Office of Planning & Research

February 16, 2021

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Jim Starr
CA Department of Fish and Wildlife
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
Jim.Starr@wildlife.ca.gov

STATE CLEARINGHOUSE

RE: SCH Number 2017122028, Pacific Gas and Electric Company Bay Area Operations & Maintenance Environmental Impact Report

Dear Jim Starr,

California State Parks offers the following comments on the Environmental Impact Report (EIR) for Pacific Gas and Electric Company's (PG&E) Incidental Take Permit (ITP) application under section 2081 of the California Endangered Species Act with the California department of Fish and Wildlife.

As Trustee agency for resources within units of the State Park System, State Parks is responsible for the preservation of natural and cultural resources within Park unit boundaries. The potential exists for impacts to ITP-covered species within State Parks property as a result of the listed activities. The compensatory mitigation approach described in the EIR allows for the offset of impacts to the three covered species and their habitats on a regional basis. This approach would not compensate State Parks for the costs the department would incur to mitigate PG&E impacts within park property, including those associated with increased invasive species management, permanent loss of native vegetation, and restoration of impacted native habitats and plant communities, particularly those that are not associated with the three species covered in the ITP.

Impacts to natural and cultural resources within State Park units should be mitigated within the park unit where the impacts occur in order to return park property and/or resources to a pre-project condition or better with the mitigation activities paid for by the project proponent. Such mitigation activities should be paid for by the project proponent (PG&E) through a separate level of compensation other than possible mitigation banks the proponent may already pay into. State Parks would like the mitigation strategy to include this caveat with regard to species, habitats, and other State Park natural and cultural resources that are impacted by the proposed activities.

We appreciate the opportunity to provide these comments on this EIR.

Sincerely,

Eduardo Guaracha
Diablo Range District Superintendent