



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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September 24, 2019

Governor's Office of Planning & Research

SEP 24 2019

STATE CLEARINGHOUSE

Mr. Frank Girardi
San Joaquin County
Community Development Department
1810 E Hazelton Avenue
Stockton, CA 95205

Dear Mr. Girardi:

Subject: Site Approval No. PA-1800305 Project, Initial Study/Mitigated Negative Declaration, SCH #2019089086, San Joaquin County

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) for the Site Approval No. PA-1800305 Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines. In accordance with our mandates, CDFW is submitting comments on the IS/MND as a means to inform San Joaquin County Community Development Department (County), as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on Projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a Project would require discretionary approval, such as a California Endangered Species Act (CESA) Incidental take Permit (ITP), a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA ITP must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project (Fish and Game Code, § 2080 et seq.). Issuance of a CESA ITP is subject to CEQA documentation; therefore, the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as potential significant modification to the Project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if the Project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, and 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 section 2080.

Lake and Streambed Alteration

CDFW requires an LSA Notification (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, washes, watercourse with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

PROJECT DESCRIPTION SUMMARY

Proponent: Jetmulch, Inc./Quartaroli & Associates, Inc.

Objective: Site Approval application for an agriculture mulching facility.

Location: The Project site is located on the north side of West Via Nicolo Road, 2,400 feet east of South Patterson Pass Road, Tracy, San Joaquin County. (APN/Address: 209-100-24/26106 Patterson Pass Road, Tracy) (Supervisory District: 5).

Timeframe: Unknown

Description: The proposed Project is a Site Approval application to establish a mulch contractor on a 37.9-acre parcel to include the construction of a 720-square-foot modular office, a 150-square-foot storage shed, and a 60,000-square-foot area with open material storage bins in the AG-160 (General Agriculture, 160-acre minimum) zone. The site will utilize a new on-site well, new septic system, and on-site storm retention pond.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations 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.

Comment 1: revisions needed to Biological Resources section

The IS/MND states in section IV, Biological Resources that subsections a through f are less-than-significant impact. CDFW does not concur with this assertion as the Project has potential impacts to biological resources that can be less-than-significant with mitigation incorporated and has included a discussion regarding mitigating through the San Joaquin Multi Species Conservation Plan (SJMSCP or Plan).

To correct this, CDFW recommends updating the check boxes in these subsections to correctly reflect the use of mitigation to reduce the Project's impacts to less-than-significant.

Comment 2: Project may be subject to Notification under Fish and Game Code Section 1600 et. seq.

Section IV Biological Resources items (b) and (c) state that the Project "...site is not located in a riparian habitat as there is no river, stream or other waterway on the project site, nor is it within an identified protected wetland...". On examination of aerial photography, it appears that two streams and a wetland are present on the parcel contrary to that statement.

To correct this, CDFW recommends updating the Project description and Impact Discussion to include grading plans and a description of how the Project will either impact or avoid impacts to the streams and wetland during such activities as grading, culverting, filling, water diversion, and storm water run-off, and include a description of how the Project will direct concentrated run-off from the increased percentage of impermeable surfaces on the parcel that are associated with the proposed construction.

If impacts to the streams and wetland are identified, then those proposed activities may be subject to Notification and CDFW may require an LSA Agreement, pursuant to Section 1600 et. seq. of the Fish and Game Code. To obtain information about the LSA Notification process, please access our website at <https://www.wildlife.ca.gov/Conservation/LSA>; or to request a Notification package, contact the Bay Delta Regional Office at (707) 428-2002.

Comment 3: revisions needed to mitigate impacts from project phasing to less-than-significant.

The IS/MND does not include a description of timeframe or period during which construction will occur. Project activities may have additional significant biological impacts due to Project phasing over time. Phasing and the additional impacts from phasing are not discussed, analyzed, or mitigated for in the IS/MND. Projects that include multiple phases with different sections or parcels built out at different time periods or phasing that includes whole-site grading with separate sections or parcels developed at later dates have impacts over a period longer than one year. This delay in full build out of a Project allows wildlife to utilize resources that develop post-grading on vacant sections or parcels. These resources include, but are not limited to; ruderal grassland and brush that provide nesting habitat for passerine birds and burrowing owls; infrastructure installed but not utilized that provide burrowing habitat for ground squirrels, burrowing owls, and short-eared owls; additional indirect impacts to nesting and foraging raptors with roost and nest trees adjacent to the project site and access routes; and pooling of rainwater on parcels that provide temporary habitat for amphibians. CDFW is unable to analyze these impacts without inclusion of a description of the Project's timing and implementation in relation to site preparation, infrastructure installation, and complete buildout.

To correct this, please revise and recirculate the IS/MND with a description of the Project's phasing and estimated timeframes from start of construction to complete buildout. If the Project's timeframe from start of construction to complete build out includes breaks in construction longer than 15 days or periods of inactivity that could allow establishment of habitat elements such as burrows and vegetation, then impacts to wildlife utilizing vacant sections or

parcels of the Project not built out must be included in the impacts analysis to ensure the Project mitigates impacts to less-than-significant. When and if such a delay occurs, and to ensure the Project is mitigating to less-than-significant, CDFW recommends revising the IS/MND to include a mitigation measure that meets the following criteria: 1) a qualified biologist shall conduct a habitat assessment survey to determine what potential wildlife and habitat elements are present that may be utilizing the vacant sections and/or parcels prior to Project-related activities taking place when there is a break in these activities greater than 15-days; 2) if unbuilt or fallow sections and/or parcels are being utilized, avoidance and minimization measures (including the measures discussed in this letter) shall be used to prevent impacts and take, and if impacts and take are not fully avoidable, additional compensatory mitigation shall be discussed and agreed upon with CDFW's approval prior to the re-initiation of construction activities.

Comment 4: revisions needed to mitigate to a level of less-than-significant in the event SJMSCP does not approve coverage.

The statement presented in the Impact Discussion in Section IV. Biological Resources of the IS/MND does not mitigate potential impacts to less-than-significant regarding CEQA. The IS/MND states the Proponent has confirmed participation in the Plan; however, this information is not stated in an enforceable mitigation measure within the section. The IS/MND also does not propose or identify specific, sufficient, and enforceable mitigation in the event the San Joaquin Multi Species Conservation Plan (SJMSCP or Plan) does not approve coverage or the Proponent chooses to not participate based on this lack of an enforceable measure. Because participation in the Plan is voluntary the IS/MND must include 1) an evaluation and discussion of potential direct and indirect impacts of the Project to biological resources including fish, wildlife, and their habitats, 2) avoidance and minimization mitigation measures to decrease those impacts, and 3) specific and sufficient compensatory mitigation in the event the avoidance and minimization measures do not mitigate to less-than-significant or in the event SJMSCP does not approve coverage of the Project in whole or part to mitigate to less-than-significant.

To correct this, please update the IS/MND to include an impacts analysis that provides an evaluation and discussion of potential quantified impacts of the Project to biological resources including fish, wildlife, and their habitats. Based on this impact analysis, please update the section to include mitigation measures that will ensure Project impacts are less-than-significant in the event SJMSCP does not approve of coverage of the Project in whole or part, or in the event the Proponent opts-out of participation in the SJMSCP.

If the impacts analysis indicates there will be direct or indirect take of CESA-listed species, and the Project cannot fully avoid take of CESA-listed species and SJMSCP does not offer take coverage, then CDFW recommends the IS/MND include language defining the Project's obligation to obtain take coverage through an Incidental Take Permit (ITP) issued by CDFW.

Comment 5: Section IV. Biological Resources does not define floristic survey protocol.
Section IV of the IS/MND does not include defined survey protocols for floristic surveys or require a qualified botanist to conduct the surveys.

To correct this, CDFW recommends Section IV. Biological Resources be revised to include adherence to CDFW's *Protocols for Surveying and Evaluating Impacts to Special-Status Native*

Plant Populations and Natural Communities (2009), including the reporting requirements contained in those protocols, and to indicate a qualified botanist shall conduct the surveys according to the protocols.

Comment 6: revisions needed to mitigate impacts to special-status plants to less-than-significant.

The IS/MND identifies caper-fruited tropidocarpum (*Tropidocarpum capparideum*) and big tarplant (*Blepharizonia plumosa*) as special-status plants with the potential to occur on the Project site, but does not define avoidance measures in the event they or other special-status plants are discovered or reduce impacts to a level of less-than-significant by identifying compensatory mitigation in the event impacts to special-status plants cannot be fully avoided.

To correct this, CDFW recommends Section IV, Biological Resources be revised to include a statement of how impacts to special-status plants will be avoided in the event they are discovered in the Project area. If significant impacts to special-status plants are not fully avoidable, CDFW recommends the IS/MND be revised to require compensatory mitigation for impacts to special-status plant species at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts. CDFW also recommends inclusion of language defining the Project's obligation to obtain CESA-listed plant take coverage through an ITP issued by CDFW when take of caper-fruited tropidocarpum (*Tropidocarpum capparideum*) and big tarplant (*Blepharizonia*) cannot be fully avoided.

Comment 7: revisions needed to mitigate impacts to California red-legged frog to a level of less-than-significant.

The IS/MND does not mitigate potential impacts to California red-legged frog (*Rana draytonii*) to less-than-significant because the IS/MND lacks an evaluation of impacts to California red-legged frog and does not include mitigation measures requiring 1) pre-construction surveys conducted according to the U.S. Fish and Wildlife Service's (USFWS) *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (2005), 2) avoidance measures determined by CDFW if and when California red-legged frog is discovered, and 3) a measure requiring participation in SJMSCP. The IS/MND does not define avoidance measures in the event California red-legged frog is discovered or reduce impacts from permanent loss of foraging habitats or indirect impacts to nesting hawks from increased construction activity to a level of less-than-significant as it does not offset those impacts with a compensatory mitigation requirement. California red-legged frog is designated as a State of California Threatened Species and impacts to the species and its habitat is prohibited without meeting certain conditions.

To correct this, CDFW recommends the IS/MND be updated to include an impacts analysis that provides an evaluation and discussion of potential impacts of the Project to California red-legged frog and their habitats. If impacts are identified, CDFW recommends the IS/MND be revised to include adherence to the mitigation strategies defined in USFWS's *Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog* (2005), in addition to adherence to the survey protocol or require participation in the SJMSCP. If the IS/MND does not include a measure that requires participation in the Plan, CDFW recommends the IS/MND be updated to include a measure requiring compensatory mitigation for impacts to California red-

legged frog nesting and foraging habitat at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts.

In the event SJMSCP does not cover the Project or the Proponent elects to not participate in the Plan, CDFW recommends the following specific and enforceable measures for California red-legged frog impact avoidance be incorporated into a revised and recirculated IS/MND to avoid impacts:

“California Red-Legged Frog Assessment and Avoidance: Project activities within the riparian zone of any stream, creek, or drainage feature, and associated upland within 100 feet shall be limited to June 15 to October 15. In project sites containing potential California red-legged frog habitat, vegetation shall be inspected by a CDFW-approved qualified biologist according to the USFWS’s Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (2005) survey protocol prior to start of project activities. A buffer of vegetation at least ten (10) feet in diameter shall be left around any egg masses found. Proponent shall keep a record of any sites where egg masses are found and shall conduct vegetation removal at these sites prior to October 15 in subsequent years.”

Comment 8: revisions needed to mitigate impacts to burrowing owls to a level of less-than-significant.

The IS/MND does not mitigate potential impacts to burrowing owls (*Athene cunicularia*) to less-than-significant because the IS/MND lacks an evaluation of impacts to burrowing owls and does not include mitigation measures requiring 1) pre-construction surveys conducted according to CDFW’S *Staff Report on Burrowing Owl Mitigation* (2012), 2) avoidance measures determined by CDFW if and when burrowing owls are discovered at the Project site, and 3) a measure requiring participation in SJMSCP. The IS/MND does not define avoidance measures in the event burrowing owls are discovered or reduce impacts from permanent loss of burrowing owl nesting or foraging habitats to a level of less-than-significant as it does not offset those impacts with a compensatory mitigation requirement. Burrowing owls are designated as a California Species of Special Concern (SSC), a designation used to describe at-risk taxa within the state that warrant proactive conservation to ensure the populations’ persistence. As an SSC, the Project’s potential impacts are compounded with ongoing impacts to the populations within the San Joaquin Valley through the loss of arid scrub and upland habitats. In addition, the urbanization and conversion of row-crop agriculture to orchard and vineyard agriculture has also contributed to the species’ decline. Therefore, loss of burrowing owl habitat can be considered a significant impact that warrants mitigation to less-than-significant through the IS/MND.

To correct this, CDFW recommends the IS/MND be revised and recirculated to include an impacts analysis that provides an evaluation and discussion of potential impacts of the Project to burrowing owls and their habitats. If impacts are identified, CDFW recommends the IS/MND be revised to include adherence to the mitigation strategies defined in the CDFW *Staff Report on Burrowing Owl Mitigation* (2012) in addition to adherence to the survey protocol or require participation in the SJMSCP. If the IS/MND does not include a measure that requires participation in the Plan, CDFW recommends the IS/MND be updated to include a measure requiring compensatory mitigation for impacts to burrowing owl foraging habitat at a minimum of

a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts.

Comment 9: revisions needed to mitigate impacts to Swainson's hawks to a level of less-than-significant.

The IS/MND does not mitigate potential impacts to Swainson's hawk (*Buteo swainsoni*) to less-than-significant because the IS/MND lacks an evaluation of impacts to Swainson's hawks and does not include mitigation measures requiring 1) pre-construction surveys conducted according to CDFW's *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (2000), 2) avoidance measures determined by CDFW if and when Swainson's hawks are discovered at or within a half-mile of the Project site, and 3) a measure requiring participation in SJMSCP. The IS/MND does not define avoidance measures in the event Swainson's hawks are discovered or reduce impacts from permanent loss of foraging habitats or indirect impacts to nesting hawks from increased construction activity to a level of less-than-significant as it does not offset those impacts with a compensatory mitigation requirement. Swainson's hawks are designated as a State of California Threatened Species and impacts to the species and its habitat is prohibited without meeting certain conditions. The loss and conversion of native grasslands and agricultural lands to urbanization and orchard and vineyard agriculture is the primary threat to Swainson's hawk populations throughout California, and about 80 percent of the Central Valley population of Swainson's hawks is located with the Sacramento, San Joaquin, and Yolo counties region. The Project's potential impacts to this historically denser population is a significant impact that warrants mitigation to less-than-significant through the IS/MND.

To correct this, CDFW recommends the IS/MND be revised and recirculated to include an impacts analysis that provides an evaluation and discussion of potential impacts of the Project to Swainson's hawks and their habitats according to CDFW's *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California* (1994). If impacts are identified, CDFW recommends the IS/MND be revised to include adherence to the mitigation strategies defined in the *Staff Report* in addition to adherence to CDFW's *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (2000) survey protocol, or require participation in the SJMSCP. If the IS/MND does not include a measure that requires participation in the Plan, CDFW recommends the IS/MND be updated to include a measure requiring compensatory mitigation for impacts to Swainson's hawk nesting and foraging habitat at a minimum of a 3:1 mitigation ratio (conserved habitat to impacted habitat) for permanent impacts and a 1:1 ratio for temporary impacts, as well as language defining the Project's obligation to obtain take coverage through an ITP issued by CDFW.

In the event SJMSCP does not cover the Project or the Proponent elects to not participate in the Plan, CDFW recommends the following specific and enforceable measures for Swainson's hawk be incorporated into a revised and recirculated IS/MND to minimize and avoid impacts:

"Pre-Construction Surveys for Swainson's Hawk: If work is to be conducted during the nesting season, focused surveys for active Swainson's hawk nests shall be conducted by a qualified biologist in a manner consistent with the Recommended Timing and Methodology of Swainson's Hawk Nesting Surveys in California's Central Valley. At least two surveys

shall be completed within two survey periods immediately prior to a project's initiation. If a lapse in project-related work of 15 days or longer occurs, another focused survey shall be performed, and the results sent to CDFW prior to resuming work. Surveys shall be conducted in all suitable habitat located at the project work site, in staging, storage, and stockpile areas, and along transportation routes. Surveys shall be conducted within ½-mile of the project area. If any active Swainson's hawk nests are found within ½-mile of the project site, CDFW shall immediately be contacted and additional survey measures may be required for project activities.

Comment 10: revisions needed to mitigate impacts to San Joaquin kit fox to a level of less-than-significant.

The IS/MND does not mitigate potential impacts to San Joaquin kit fox (*Vulpes macrotis mutica*) to less-than-significant because the IS/MND lacks an evaluation of impacts to San Joaquin kit fox and does not include either a mitigation measure that requires full avoidance of take of San Joaquin kit fox or their habitat. The IS/MND does not define avoidance measures in the event San Joaquin kit fox are discovered or reduce impacts from permanent loss of open space and movement corridors and foraging habitats or indirect impacts to foraging and denning impacts from increased construction activity to a level of less-than-significant as it does not offset those impacts with compensatory mitigation requirements. San Joaquin kit fox are designated as a State of California Endangered Species. The loss of valley and foothill grasslands due to conversion to agriculture and urbanization is the primary threat to San Joaquin kit fox populations throughout California. The USFWS's *Recovery Plan for Upland Species of the San Joaquin Valley, California* (1998) states connectivity between the sub-populations of the kit fox are essential for recovery of the species. The Project's potential impacts to connectivity and permanent loss of habitat requires an impacts evaluation in a revised and recirculated IS/MND. Given the severe population declines of the species and magnitude of historic habitat loss, any impacts identified can be considered as significant and even more so when evaluated in a cumulative manner.

To correct this, CDFW recommends the IS/MND be revised and recirculated to include an impacts analysis that provides an evaluation and discussion of potential impacts of the Project to San Joaquin kit fox and their habitats. If the impacts analysis indicates there will be direct or indirect take and the Project cannot fully avoid impacts to and take of San Joaquin kit fox, CDFW recommends the IS/MND be revised to include a measure requiring participation in the SJMSCP, or in the event SJMSCP does not cover the Project or the Proponent elects to not participate in the Plan, then CDFW recommends the IS/MND include language defining the Project's obligation to obtain take coverage through an ITP issued by CDFW.

Comment 11: revisions needed to mitigate impacts to nesting birds to a level of less-than-significant.

Section IV. Biological Resources does not include nesting survey protocol or avoidance measures for nesting birds that may be utilizing the Project site prior to start of Project activities, including the CESA-listed tricolored blackbird (*Agelaius tricolor*). If tri-colored blackbird occur on the site then CDFW recommends the Project obtain an ITP.

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To correct this, CDFW recommends the IS/MND be revised to include the following nesting bird assessment and avoidance measure:

“Nesting Bird Assessment and Avoidance - Prior to the initiation of Project activities, including ground disturbing activities scheduled to occur between February 15 and September 15, a qualified biologist shall conduct a habitat assessment and nesting survey for nesting bird species no more than five (5) days prior to the initiation of work. Surveys shall encompass all potential habitats (e.g., grasslands and tree cavities) within 250 feet of the project site. The qualified biologist conducting the surveys shall be familiar with the breeding behaviors and nest structures for birds known to nest in the Project vicinity. Surveys shall be conducted during periods of peak activity (early morning, dusk) and shall be of sufficient duration to observe movement patterns. Survey results, including a description of timing, duration and methods used, shall be submitted to CDFW for review forty-eight (48) hours prior to the initiation of the Project. If a lapse in Project activity of seven days (7) or more occurs, the survey shall be repeated, and no work shall proceed until the results have been submitted to CDFW.

If nesting birds are found, then no work shall be initiated until nest-specific buffers have been established with written approval from CDFW. The buffer area(s) shall be fenced off from work activities and avoided until the young have fledged, as determined by the qualified biologist. Active nests within or adjacent to the project site shall be monitored by the qualified biologist daily throughout the duration of project activities for changes in bird behavior or signs of distress related to project activities. If nesting birds are showing signs of distress or disruptions to nesting, then that nest shall have the buffer immediately increased by the qualified biologist until no further interruptions to breeding behavior are detectable.”

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 California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data#44524420-pdf-field-survey-form>. The completed form can be mailed electronically to CNDDDB at the following email address: cnddb@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

CONCLUSION

CDFW appreciates the opportunity to comment on the IS/MND to assist the County in identifying and mitigating Project impacts on biological resources.

Mr. Frank Girardi
San Joaquin County Community Development Department
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Questions regarding this letter or further coordination should be directed to Ms. Jeanette Griffin, Environmental Scientist, at (209) 234-3447 or Jeanette.Griffin@wildlife.ca.gov; or Ms. Melissa Farinha, Senior Environmental Scientist (Supervisory), at (707) 944-5579.

Sincerely,


Gregg Erickson
Regional Manager
Bay Delta Region

cc: John Glick, Quartaroli & Associates – johnlick@quartaroli.com
State Clearinghouse