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May 13, 2022

Ms. Laura Russell
Town of Portola Valley
765 Portola Road
Portola Valley, CA 94028
stanfordeir@portolavalley.net

Subject: Stanford Wedge Housing Project, Draft Environmental Impact Report, SCH No. 2020010203, Town of Portola Valley, San Mateo County

Dear Ms. Russell:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) prepared by the Town of Portola Valley (Town) for the Stanford Wedge Housing Project (Project), located in San Mateo County, pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

CDFW is submitting comments on the DEIR to inform the Town, as the Lead Agency, of potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (i.e., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA) or Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and 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 Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, including the Southern California/Central Coast evolutionarily significant unit of mountain lion (*Puma concolor*), currently a candidate for listing, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document

[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.

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 significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

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 section 2080 et. seq.

Lake and Streambed Alteration

The Project has the potential to impact resources including but not limited to unnamed tributaries to Trancos Creek. CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for any project activities that will 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, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. **If the Project would impact the unnamed tributaries to Trancos Creek, any other streams, or associated riparian habitat, then the Project would be subject to LSA Notification requirements as further described below.** CDFW, as a Responsible Agency under CEQA, would consider the CEQA document for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA (Pub. Resources Code § 21000 et seq.) as the Responsible Agency.

Raptors and Other Nesting Birds

CDFW has authority over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 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 white-tailed kite (*Elanus leucurus*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), may not be taken or possessed at any time (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

PROJECT DESCRIPTION SUMMARY

Proponent: Stanford University

Objective: The Project consists of four general components: 1) a residential development, 2) a new looped public trail, 3) a new fire access road, and 4) a vegetation management plan. The Project would develop 7.4 acres of the 75.4-acre property. This 7.4-acre development site would be subdivided into 30 residential lots which would include 27 single-family residences and 12 multi-family units. A new private road would be constructed to loop through the residential development from Alpine Road. A new 6-foot-wide looped recreational trail would be constructed along the western edge of the development area within the undeveloped portion of the Project site. A permanent fire access road would be constructed to access the undeveloped portions of the Project site. A vegetation management plan would be developed for both the developed and undeveloped portions of the property to mitigate areas of high fire hazard.

Timeframe: The Project would be completed within 24 to 30 months.

ENVIRONMENTAL SETTING AND LOCATION

The Project site is located at 3530 Alpine Road on a 75.4-acre parcel (APN 077-281-020) that forms a generally triangular shape between Alpine Road, and developments along Westridge Drive, and Minoca Road in Portola Valley, California. The Project site is mostly undeveloped consisting of chamise chaparral (*Adenostoma fasciculatum*), coast live oak woodland (*Quercus agrifolia*), and blue oak woodland (*Q. douglasii*). In addition, two ephemeral streams and an intermittent stream, all tributaries to Trancos Creek, occur in the Project site. Mixed riparian forest consisting mainly of California bay (*Umbellularia californica*), California buckeye (*Aesculus californica*), and coast live oak occurs along the intermittent stream in the northern portion of the Project site. The Alpine Rock Ranch, a horse boarding facility with stables, currently occupies approximately 7.4 acres (10% of the total site area) in the northeastern portion of the Project site, where residential development would take place. Special-status species with the potential to occur in or near the Project site include, but are not limited to, San Francisco garter snake, state and federally listed as endangered and a Fully Protected species; Southern California/Central Coast mountain lion, state candidate for listing and a specially protected mammal (Fish & G. Code, § 4800); California red-legged frog (*Rana draytonii*), federally listed as threatened and a California Species of Special Concern (SSC); San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), SSC; pallid bat (*Antrozous pallidus*), SSC; western red bat (*Lasiurus blossevillii*), SSC; western pond turtle (*Emys marmorata*), SSC; white-tailed kite, a Fully Protected

species; western leatherwood (*Dirca occidentalis*), California Rare Plant Rank[2] (CRPR) 1B.2; bent-flowered fiddleneck (*Amsinckia lunaris*), CRPR 1B.2; Woodland woolly threads (*Monolopia gracilens*), CRPR 1B.2; and Santa Cruz clover (*Trifolium buckwestiorum*), CRPR 1B.1.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Town in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those recommended by CDFW below, CDFW concludes that an EIR is appropriate for the Project.

I. MANDATORY FINDINGS OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

Environmental Setting and Related Impact Shortcoming

COMMENT 1: San Francisco Garter Snake

Issue: The DEIR identifies that the Project site is within the range of San Francisco garter snake (SFGS), a state and federally listed as endangered species and state Fully Protected species (DEIR Appendix D page 32). The Project site contains potentially low quality habitat for SFGS in and near the streams on the Project (*ibid.*). Construction and maintenance activities in suitable upland SFGS habitat has the potential to result in direct and indirect take to SFGS. Indirect take may occur as a result of upland habitat loss and degraded site suitability for SFGS to complete all stages of their life cycle such as through the construction of roads and loss of habitat through development.

There are five California Natural Diversity Database (CNDDB) occurrences of SFGS within five miles of the Project site, with the closest approximately 2.3 miles northwest of the Project. The DEIR assumes that SFGS is absent from the site and does not provide any avoidance, minimization, or mitigation measures for the species.

Evidence the impact would be significant: Project activities, including grading and vegetation removal, in potentially suitable SFGS habitat have the potential to result in significant impacts to SFGS, including crushing, injuring, or killing SFGS, and could

[2] CRPR 1B plants are considered rare, threatened, or endangered in California and elsewhere. Further information on CRPR ranks is available in CDFW's *Special Vascular Plants, Bryophytes, and Lichens List* (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline) and on the California Native Plant Society website (https://www.cnps.org/rare-plants/cnps-rare-plant-ranks).

result in a substantial reduction in the SFGS population. SFGS is an endemic snake with a highly limited range in the San Francisco Peninsula. SFGS utilize a variety of habitats including upland sites for basking, rodent burrows for shelter, and low-lying marsh and slow-flowing stream habitat for feeding and reproduction (U.S. Fish and Wildlife Service (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, California red-legged frog (USFWS 2007).

Recommendation: To reduce potential impacts to less-than-significant and avoid take of SFGS, CDFW recommends including the following mitigation measures in the EIR.

Recommended Mitigation Measure 1 San Francisco Garter Snake Avoidance: The Project shall be designed to avoid all impacts to SFGS within suitable SFGS habitat including but not limited to wetlands, streams and waterways as well as associated upland habitat capable of providing dens and basking habitat as determined by a qualified biologist, experienced with SFGS, in coordination with CDFW. The EIR shall include a report prepared by the qualified biologist detailing habitat survey methodology and a map demarcating any SFGS habitat or individuals occurs in the survey area, including potential burrow refugia. No build buffer zones around wetland and riparian resources shall be incorporated into the Project footprint to avoid impacts to any SFGS habitat. If take of SFGS may occur, the Project shall not be approved. The lead agency shall coordinate with CDFW to ensure the Project is designed to avoid take of a fully protected species.

COMMENT 2: Mountain Lion

Issue: The Project has the potential to increase human interactions with mountain lions that can result in conflicts and lead to potentially significant impacts to mountain lion movement, behavior and/or individuals. The DEIR states that the Project site may provide suitable habitat for southern California/Central Coast mountain lion, a candidate for listing as state threatened or endangered (DEIR page 7-4). The Project site is surrounded by low density residential land use and open space, including Foothills Park and Enid Pearson-Arastradero Open Space Preserve to the southeast, Jasper Ridge Reserve to the northwest, and Windy Hill Open Space Preserve to the southwest. Citizen scientists have documented evidence of mountain lion presence in these surrounding open spaces (iNaturalist 2022). In addition, home security surveillance systems at residences approximately one mile north of the Project have recorded mountain lion presence (Bay City News 2022). While the Project site is adjacent to human development and therefore unlikely to be used for reproduction and denning, its proximity to open space makes it potentially suitable hunting and dispersal habitat (Wang et al. 2015).

Evidence the impact would be significant: The Project would increase human presence adjacent to and within mountain lion habitat via increased residences, a public hiking trail, and ongoing vegetation treatment in the remaining open space. Increased human presence and associated factors such as traffic, noise, and light pollution, restrict mountain lion movement across the landscape. Most factors affecting the ability of the Southern California/Central Coast mountain lions to survive and reproduce are caused by humans (Yap et al. 2019). As California's human population has continued to grow and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety, particularly if mountain lions do not receive CESA protection in the future. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). For example, mountain lions tend to avoid roads and trails by the mere presence of those features, regardless of how much they are used (Lucas 2020). This restriction in mountain lion movement may reduce gene flow and could increase the decline in genetic diversity of mountain lions in southern and central parts of the State (Dellinger et al. 2020). In addition, increased traffic could cause vehicle strike mortality. Also, mountain lions avoid areas with low woody vegetation cover and artificial outdoor lighting (Beier 1995). Ultimately, as human population density increases, the probability of mountain lion persistence decreases (Woodroffe 2000).

Recommendation: To reduce potential impacts to less-than-significant, CDFW recommends including the following mitigation measures in the EIR.

Recommended Mitigation Measure 3 Mountain Lion Habitat Protection: The remaining open space in the Project area shall be permanently preserved through a conservation easement. No further development including new housing, shall be allowed within the conservation easement area.

Recommended Mitigation Measure 4 Mountain Lion Awareness Signage: Signage shall be installed at trailheads and posted in the community open space within the residential development identifying that the area is located in mountain lion habitat. The signs shall direct residents and trail users to keep all pets on leash and to stay on the trail. Additional information from CDFW's Keep Me Wild Mountain Lion brochure may be included on the sign:
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=57523&inline

II. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

Project Description and Related Impact Shortcoming

COMMENT 3: Streams

Issue: As noted above, if the Project would impact the unnamed tributaries to Trancos Creek, or riparian habitat associated with these streams, or any other streams, then the Project would be subject LSA Notification requirements. The DEIR states that riparian habitat "may be impacted by vegetation management activities, which would necessitate an LSAA" (DEIR page 7-5).

Evidence the impact would be significant: Project activities would potentially remove riparian habitat. Riparian habitat is of critical importance to protecting and conserving the biotic and abiotic integrity of an entire watershed. When riparian habitat is substantially altered, riparian functions become impaired, thereby likely substantially adversely impacting aquatic and terrestrial species. Substantial removal of trees and other vegetation significantly reduces suitable nesting and roosting habitat for many bird and bat species, such as pallid bat, an SSC, and causes the loss of important refugia for small mammals. Mature riparian trees and mid canopy vegetation will take considerable time to reestablish and grow to function. Therefore, if the Project impacts stream and associated riparian habitat, Project impacts to these resources would be potentially significant.

Recommendation: To comply with California Fish and Game Code section 1600 et seq. and reduce impacts to stream and riparian habitat to less-than-significant, CDFW recommends that the EIR incorporate the following mitigation measure.

Recommended Mitigation Measure 5 Notification of Lake and Streambed Alteration: For Project activities that may substantially alter the bed, bank, or channel of the unnamed tributaries to Trancos Creek, or any other streams, including but not limited to riparian vegetation disturbance, an LSA Notification shall be submitted to CDFW pursuant to Fish and Game Code section 1602 prior to Project construction. If CDFW determines that an LSA Agreement is warranted, the Project shall comply with all required measures in the LSA Agreement, including but not limited to requirements to mitigate impacts to the streams and riparian habitat. Permanent impacts to the stream and associated riparian habitat shall be mitigated by restoration of riparian habitat at a 3:1 mitigation to impact ratio based on acreage and linear distance as close to the Project area as possible and within the same watershed and year as the impact. Temporary impacts shall be restored on-site in the same year as the impact.

COMMENT 4: Riparian Encroachment

Issue: The Project may impact riparian habitat associated with the unnamed tributaries to Trancos Creek, a potentially significant impact. The DEIR states that the Project would not directly impact any streams, but that the Project may impact riparian habitat (DEIR page 7-5). While the residential development would not impact the riparian

habitat associated with the unnamed tributary to Trancos Creek in the north of the Project site, it is not clear how far from the riparian forest the development is located, or how defensible space vegetation treatment adjacent to the housing would impact the riparian habitat. In addition, the proposed fire access road would enter the property within 50 feet of the unnamed tributary in the south (DEIR page 7-32). Encroaching into the riparian corridor can negatively impact sensitive species, such as western pond turtle, special-status frogs, and tree-roosting bats, that rely on an appropriately sized riparian buffer between development and the stream zone. Encroaching on the riparian zone may lead to deleterious materials, including wastewater discharge, sediment from increased erosion, and other pollutants, entering the stream (DEIR page 12-16).

Because natural stream processes are complex and dynamic, development too close to stream channels can result in threats to property from erosion due to lateral and/or vertical channel adjustments over time. Incorporation of a sufficient riparian buffer into the Project design is necessary to avoid the potential need for stream channel stabilization solutions in the long-term.

Evidence the impact would be significant: Riparian habitats are important to watershed integrity because they perform many ecological functions, such as enhancing water quality and quantity, increasing biodiversity, providing habitat connectivity, and supplying flood capacity. Impacts to riparian habitats have potential to cause a wide range of adverse effects to fish and wildlife resources for the following reasons.

Remaining riparian habitat is substantially reduced from historic levels. An estimated 2 to 7 percent of California's riparian habitat remains intact and has not been converted to other land uses (Katibah 1984, Dawdy 1989). Development within and adjacent to riparian habitat areas is a principal cause of habitat loss and degradation. Loss and degradation of additional riparian habitat occurs in the context of cumulatively significant losses.

Riparian vegetation improves stream water quality by removing sediment, organic and inorganic nutrients, and toxic materials (Belt and O'Laughlin 1994, Mitsch and Gosselink 2000, USDA 2000, Mayer et al. 2006). Riparian buffers help keep pollutants from entering adjacent waters through a combination of processes including dilution, sequestration by plants and microbes, biodegradation, chemical degradation, volatilization, and entrapment within soil particles. As buffer width increases, the effectiveness of removing pollutants from surface water runoff increases (Castelle et al. 1992). There is substantial evidence showing narrow buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosofske et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Riparian trees and vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat (Moyle 2002, CDFW 2007). Riparian forests provide thermal protection, shade, and large woody debris. Large woody debris stabilizes substrate, provides shelter and cover from predators, facilitates pool establishment and maintenance, and creates habitat for aquatic invertebrates, a key food source in aquatic and terrestrial food chains.

Riparian habitats also contribute to bank stability and provide flood protection. Development which includes increases in impervious surfaces and installation of stormwater systems and storm drain outfalls can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows (Hollis 1975, Konrad and Booth 2005). Riparian habitat and adjacent wetlands and floodplains are critical to lessening these impacts because they store and meter floodwaters, recharge groundwater aquifers, trap sediment, filter pollution, help minimize erosion, lessen peak flow velocities, and protect against storm surges (Mitsch and Gosselink 2000, Tockner et al. 2008). In doing so, they protect adjacent upland, downstream, and coastal properties from loss and damage during flooding and help maintain surface and groundwater during summer months.

In addition to direct habitat loss, development adjacent to a riparian zone has three principal indirect effects: 1) fragmentation of habitat into smaller, non-contiguous areas of less-functional habitat by structures, roads, driveways, yards and associated facilities; 2) the introduction or increased prevalence of exotic species or species that are habitat generalists, termed “human adapted” or “urban exploiters;” and 3) decreases in native species abundance and biodiversity and the loss of “human-sensitive” species that require natural habitats (Davies et al. 2001, Hansen et al. 2005, CDFG 2007).

Recommendation: To reduce potential impacts to less-than-significant, CDFW recommends that the Project establish and the EIR incorporate a riparian buffer zone for each unnamed tributary and limit development and vegetation clearing to outside of the riparian area. CDFW is available to coordinate with the Town to determine appropriate site-specific riparian buffers to reduce impacts to sensitive species and riparian habitat to less-than-significant. At a minimum, CDFW recommends a 50-foot riparian buffer as measured from the top of streambank to the nearest Project infrastructure.

COMMENT 5: Tree Removal

Issue: The DEIR states that approximately 114 or more trees would be removed on the Project development site (DEIR page 3-3); however, the DEIR does not include the species, location, or size of trees planned to be removed. The DEIR states that there are multiple habitat types located on the site including chamise chaparral (*Adenostoma fasciculatum*), coast live oak woodland (*Quercus agrifolia*), and blue oak woodland (*Q.*

douglasii). Removal of large native oak trees may result in a potentially significant impact due to the general decline of oak habitat in California and the loss of ecosystem services provided by oaks.

Evidence the impact would be significant: California oak woodlands have been reduced by approximately 50% from their historical range due to habitat conversion. Current rates of blue oak recruitment are not sufficient to provide population-level replacement (Zaveleta et al. 2007). Oak woodlands provide food and habitat to a variety of wildlife including birds, insects, mammals, reptiles, amphibians, and native understory plants and support some of the richest species abundance in California (Zaveleta et al. 2007, CalPIF 2002). Large mature trees (e.g., native oak tree that is greater than 15 inches in diameter) are of particular importance due to increased biological values such as providing nesting bird habitat and bat roost habitat. Loss of large mature native oaks has the potential to result in signification impacts for these reasons. While the DEIR includes on-site tree planting as a minimization measure for riparian trees removed, on-site planting alone is not sufficient to completely off-set temporal impacts from the loss of mature trees due to an uncertain time lag from when the new resources will be available (Marón et al., 2010).

Recommendation: CDFW recommends the Project avoid large diameter tree removal to the greatest extent feasible. Where large diameter tree removal is unavoidable, CDFW recommends Project mitigation include in-kind preservation of mature native trees. CDFW recommends that the Town include preservation of open space as a mitigation measure in the EIR for large tree removal, as identified in recommended mitigation measure 4 above.

III. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Mitigation Measures and Related Impact Shortcoming

COMMENT 6: Nesting Bird Surveys

Issue: The DEIR proposes to implement mitigation measure Bio-13a: Nesting Bird Avoidance, Substrate Pre-removal, Pre-activity Surveys and Buffers to mitigate for impacts to nesting birds. The measure incorrectly identifies the nesting bird period for raptor species and does not describe how the active nest buffer will be established if active nests are found by the qualified biologist.

Recommendation: To evaluate and avoid potential impacts to nesting bird species, CDFW recommends incorporating the following mitigation measures into the Project's

DEIR existing measure, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 6 Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day and during appropriate nesting times.

Recommended Mitigation Measure 7 Active Nest Buffers: If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, a species appropriate buffer between the nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g. defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist shall have the authority to cease all construction work in the area until the young have fledged, and the nest is no longer active.

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 CNNDB online field survey form and other methods for submitting data can be found 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://wildlife.ca.gov/Data/CNDDB/Plantsand-Animals.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, § 711.4; Pub. Resources Code, § 21089). 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.

CONCLUSION

Thank you for the opportunity to comment on the Project's DEIR. If you have any questions regarding this letter or for further coordination with CDFW, please contact Mr. Will Kanz, Environmental Scientist, at (707) 337-1364 or Will.Kanz@wildlife.ca.gov; or Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

ec: State Clearinghouse # 2020010203

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