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From: Wood, Dylan@Wildlife <Dylan.A.Wood@wildlife.ca.gov>
Sent: Monday, September 14, 2020 3:29 PM
To: Scott Johnson
Cc: Wildlife R2 CESA; OPR State Clearinghouse
Subject: Comments on the MND for the Natomas Town Center II (East) Project (SCH: 2020089021)

Attachments: Attachment 1 Homegrown Plant List_Final-1.pdf

9/14/2020

Governor's Office of Planning & Research

Sep 14 2020

Dear Mr. Johnson:

STATE CLEARINGHOUSE

RE: Natomas Town Center II (East) (PROJECT)
MITIGATED NEGATIVE DECLARATION (MND) SCH# 2020089021

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the City of Sacramento (the City) 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 statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

The project would result in the construction and operation of neighborhood-serving uses, including retail stores, restaurants, coffee shop, fitness center, bank, and daycare center. The project would include a parking lot add vehicle and pedestrian circulation, as well as landscaping. The project consists of 77,699 square feet of retail, commercial, and neighborhood-serving uses.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below 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. Editorial comments or other suggestions may also be included to improve the document or facilitate an effective environmental review process. Where

CDFW recommends specific revisions to the MND, deletions are marked with a strikethrough (~~example~~) while additions are marked as underlined (example).

Comment 1: Revisions needed to mitigate impacts to biological resources a level of less-than-significant.

The MND discloses project activities within the boundary of the Natomas Basin Habitat Conservation Plan (NBHCP). As such the City outlines the survey requirements and NBHCP mitigation fee payment in the MND in compliance with the Sacramento 2035 General Plan, NNCP EIR, and NBHCP. However, the MND does not disclose project-specific, enforceable mitigation measures to address these requirements.

To address this comment, CDFW recommends the City add additional mitigation measures (e.g. BIO-2 and BIO-3) that would commit the project proponent to meeting the requirements outlined above. This could include one measure that outlines adherence to the survey requirement and one measure that describes the mitigation fee payment.

Comment 2: Project landscaping can be enhanced.

CDFW has noted that landscaping improvements will be implemented in the Project. CDFW recommends consideration of the Homegrown Habitat Plant List (Sacramento Valley Chapter, California Native Plant Society) (Attachment 1) when developing the final planting palette. The Homegrown Habitat Plant List (HHPL) is the result of a coordinated effort of regional stakeholders with the intent of improving landscape plantings for the benefit of property owners and ecosystem. Including plants from the HHPL is intended to produce the following outcomes for landscaping:

- Increased drought tolerance
- Decreased water use
- Decreased maintenance and replacement planting costs
- Increased functionality for local pollinators and wildlife
 - Increase in overall biodiversity and ecosystem health
- Increased carbon sequestration and climate change resilience

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental documents 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 types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>. The completed form can be sent electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

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 MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this email or further coordination should be directed to Dylan Wood, Environmental Scientist at 916-358-2384 or dylan.a.wood@wildlife.ca.gov.

Sincerely,

Dylan Wood

California Department of Fish and Wildlife
Environmental Scientist
(916) 358-2384



References:

[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

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