



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

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GAVIN NEWSOM, Governor

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January 8, 2021

Governor's Office of Planning & Research

Jan 08 2021

Mr. Scott Orr, Deputy Director of Planning

County of Sonoma

2550 Ventura Avenue

Santa Rosa, CA 95403

Scott.Orr@sonoma-county.org

STATE CLEARINGHOUSE

Subject: UPC19-0002 Turkey Farm Cannabis Cultivation and Processing,
Mitigated Negative Declaration, SCH No. 2020120219, City of Glen Ellen,
Sonoma County

Dear Mr. Orr:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the County of Sonoma (County) for UPC19-0002 Turkey Farm Cannabis Cultivation and Processing (Project) pursuant the California Environmental Quality Act (CEQA).

CDFW is submitting comments on the MND to inform the County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project. CDFW is providing these comments and recommendations regarding those activities involved in the Project that are within CDFW's area of expertise and relevant to its statutory responsibilities (Fish and Game Code, § 1802), and/or which are required to be approved by CDFW (CEQA Guidelines, §§ 15086, 15096 and 15204).

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 permits issued under the California Endangered Species Act (CESA), 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.

PROJECT DESCRIPTION SUMMARY

Proponent: Timothy Crites (Applicant)

Description and Location: The Project site is located at: 101 Trinity Road, in the City of Glen Ellen, Sonoma County, California 95442; APNs: 053-110-001 and 053-130-009.

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The Project proposes two outdoor areas and mixed-light cultivation in four greenhouse “rooms” within the greenhouse/nursery/propagation/head house facility. The Project construction proposes a maximum cut of 4,004 cubic yards and a maximum fill of 4,108 cubic yards. The Project would cause a total of approximately 173,000 square feet of temporary and permanent land disturbance.

On-site structures, including former agricultural structures and remains of structures burned in the 2017 Nuns Fire, would be demolished. The outdoor cultivation area is proposed where these structures are currently located.

The Project would receive groundwater from a private well on a neighboring parcel, for which an existing water pipeline is already in place. The Project proposes to install a pipeline to convey Project wastewater to an adjoining parcel with a permitted leach field. The pipeline would cross the ephemeral stream on-site.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand the Project, its alternative’s (if applicable), and significant impacts on the environment (CEQA Guidelines, §§15125 and 15360). CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, or endangered species (CEQA Guidelines, §15380). Threatened, endangered, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to:

- Burrowing owl (*Athene cunicularia*; SSC)
- Foothill yellow-legged frog (*Rana boylei*; northwest clade SSC)
- Red-bellied newt (*Taricha rivularis*; SSC)
- California freshwater shrimp (*Syncaris pacifica*; FE, SE)
- Pallid bat (*Antrozous pallidus*; SSC)
- Black swift (*Cypseloides niger*; SSC)
- Jepson's leptosiphon (*Leptosiphon jepsonii*; 1B.2)
- Sonoma ceanothus (*Ceanothus sonomensis*; 1B.2)
- Cobb Mountain lupine (*Lupinus sericatus*; 1B.2)
- Narrow-anthered brodiaea (*Brodiaea leptandra*; 1B.2)
- Fragrant fritillary (*Fritillaria liliacea*; 1B.2)

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- Two-fork clover (*Trifolium amoenum*; 1B.1)

FE = Federally Endangered; FT = Federally Threatened; SE = State Endangered; SFP = State Fully Protected; SSC = State Species of Special Concern

CNPS Plant Ranks

- 1B = Rare, Threatened, or Endangered in California and Elsewhere
- 2A = Presumed Extirpated in California, But Common Elsewhere
- 2B = Rare, Threatened, or Endangered in California, But More Common Elsewhere
- 4 = Of limited distribution or infrequent

CNPS Threat Ranks

- 0.1-Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- 0.2-Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- 0.3-Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

COMMENTS AND RECOMMENDATIONS

CDFW offers the below 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, including:

Comment 1: Lake and Streambed Alteration

Issue: In 2018, CDFW staff processed an LSA Notification via the online Environmental Permit Information Management System (EPIMS)-01268 and EPIMS-01269 Self-Certifications for the 101 Trinity Road, Glen Ellen. However, the MND indicates that "prior to issuance of any grading or building permit for the sewer pipeline extension across the unnamed ephemeral tributary (to the north of the project site), the applicant should submit the pipeline stream crossing plans to CDFW for review...". Pipeline extension work impacting the unnamed ephemeral tributary is not currently covered under a 1602 notification.

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Recommendation: The Project Proponent should submit another LSA notification via EPIMS for pipeline extension work and any other stream-related Project activities that were not covered under previous notification(s).

Comment 2: Burrowing Owl

Issue: Page 39 of the MND states that the Project may result in loss of burrowing owl foraging habitat. However, the document does not evaluate the amount of burrowing owl foraging habitat that will be impacted or sufficiently address potential impacts to the species.

Evidence Impact Would be Significant: Burrowing owl is a California Species of Special Concern due to population decline and breeding range retraction. Loss of foraging habitat contributes to diminished resources needed to support burrowing owl individuals and/or populations. In addition, if occupied burrows occur on-site or nearby the Project site, audio and visual disturbances caused by construction activities can cause nest and wintering burrow abandonment, loss of young, and reduced health and vigor of adults or young. Therefore, Project impacts to burrowing owl nests and/or foraging habitat would be potentially significant.

Recommendations: For an adequate environmental setting and impact analysis, and to reduce impacts to less-than-significant, CDFW recommends that the MND evaluate and quantify the amount of suitable burrowing owl habitat and any owl burrows that would be impacted by Project activities. The Project area should consider all temporary and permanent impacts that may impact foraging habitat, including anywhere heavy equipment may occur on the site.

After identifying all potential areas of suitable habitat, the MND should include a mitigation measure requiring a qualified biologist to conduct surveys following the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation survey methodology (see <https://wildlife.ca.gov/Conservation/Survey/Protocols#377281284-birds>). Surveys should encompass identified areas of burrowing owl foraging habitat and include a sufficient buffer zone to detect owls nearby that may be impacted. Time lapses between surveys or Project activities should trigger subsequent surveys including but not limited to a final survey **within 24 hours** prior to ground disturbance before construction equipment mobilizes to the Project area. The qualified biologist should have a minimum of two years of experience implementing the CDFW 2012 survey methodology resulting in detections.

Detected burrowing owls should be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report, unless otherwise approved in writing by CDFW, and any eviction plan should be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow

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or other shelter) as a “take” avoidance, minimization, or mitigation measure; therefore, off-site habitat compensation should be included in the eviction plan. Off-site habitat compensation should also be required for any nest burrows used within the last three year that would be removed. Habitat compensation acreages should be approved by CDFW, as the amount depends on site specific conditions, and completed before Project construction. It should also include placement of a conservation easement and preparation and implementation of a long-term management plan.

Comment 3: Special-Status Bat Species

Issue: The MND indicates that the Project has the potential to impact bat species including: Townsend's big-eared bat, pallid bat, western red bat, and hoary bat. According to the Biogeographic Information and Observation System (BIOS), pallid bat is observed approximately 2.5 miles south of the Project site. Construction impacts would be considered significant under CEQA. The MND does not fully address impacts to the species as a result of Project activities.

Evidence Impact Would be Significant: Townsend’s big-eared bat, pallid bat, western red bat, and hoary bat are protected by CDFW as California Species of Special Concern. Bats often roost in buildings and other structures; especially as human development has encroached on wildland habitat. The Project Construction section (Page 13) says that Project activities include demolition and the area proposed for outdoor cultivation currently contains agricultural buildings and partial structures. Demolition activities proposed on-site may result in the disturbance and/or loss of hibernation or maternal roost sites, which may result in the harm, death, displacement of individual bats and/or the disruption of reproductive success of nursery colony roosts.

Recommendations: The MND should clarify the scope of potential hibernation or roost sites that may be impacted by the Project. If buildings providing suitable bat hibernation or roost habitat are removed as part of the Project, these impacts are not adequately addressed in the CEQA document.

For buildings/structures containing suitable bat habitat will be removed, a qualified biologist should conduct a bat habitat assessment of buildings/structures proposed for removal to determine presence of bats. CDFW should review and accept resumes of biologists proposing to conduct surveys for special-status bats to ensure each biologist possesses the appropriate specialized qualifications; such as 1) at least 2 years of experience conducting bat surveys that resulted in detections for the relevant species including the Project name, dates, and person who can verify the experience, and 2) the types of equipment used to conduct surveys.

Removal of buildings/structures with bats should be seasonally timed to avoid and minimize impacts: Prior to maternity season – from approximately March 1 (or when

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night temperatures are above 45°F and when rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If removal must occur during these timeframes, a qualified biologist should conduct a survey to determine if maternity colonies are winter torpor bats are present. If present, the buildings/structures should not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.

Comment 4: Foothill Yellow-Legged Frogs and Red-bellied Newt

Issue: Project activities have the potential to directly and/or indirectly impact foothill yellow-legged frog and red-bellied newt and/or their habitat. One observation of red-bellied newt either overlaps or is directly adjacent to the Property site (California Natural Diversity Database (CNDDDB) Accessed January 2021). CNDDDB also shows two observations of foothill yellow-legged frog approximately 2.25 miles to the southwest of the site (CNDDDB Accessed January 2021). The MND does not require any compensatory mitigation for the loss of potential foothill yellow-legged or red-bellied newt terrestrial or aquatic habitat.

Evidence Impact would be Significant: Foothill yellow-legged frog was advanced as a candidate species under CESA by the Fish and Game Commission in 2017 due to growing concerns over the species' decline in a significant portion of its range. The northwest clade was not listed under CESA in 2019; however, populations to the south and east were listed. Foothill yellow-legged frogs have been extirpated from about two-thirds of their historical range since 1970 (U.S. Forest Service 2016). Red-bellied newts are a Species of Special Concern and are endemic to California. Agriculture presents a threat to newt habitat and lifecycle, because of the alteration and degradation of streams (Lannoo 2005).

Recommendations: The MND should analyze all groundwork activities, such as grading and filling, that may potentially impact foothill yellow-legged frog and/or red-bellied newt terrestrial and aquatic habitat. It should also discuss all potentially significant impacts to the species. For any permanent Project impacts to foothill yellow-legged frog, red-bellied newt, or their habitat, CDFW recommends the MND include appropriate and effective compensatory mitigation by preserving like habitat of equal or greater habitat value. If the mitigation lands will be on-site, the draft MND should include a detailed map showing the preserved land and it should specify that the preserved land area will be protected in perpetuity under a conservation easement or deed restriction. CDFW recommends a qualified biologist experienced in the identification and life history of be on-site during all Project activities.

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Comment 5: Special-Status Plant Surveys

Issue: The MND states that there is likelihood for multiple special-status plant species to occur on the Project site. For example, observations of Sonoma Ceanothus and narrow-anthered brodiaea are located approximately 0.9 miles southeast of the site (CNDDDB Accessed January 2021). However, the document also indicates that “annual grassland and ruderal habitat do not support special-status plant species”. Narrow-anthered brodiaea may occur in valley and foothill grassland (California Native Plant Society, 2021). Grassland habitat is located on-site and, therefore, may be suitable habitat for this species. It is understood that much of the Property site burned during the 2017 Nunn fire; however, time has elapsed providing potential for regeneration of special-status species on the site.

Recommendation: A Qualified Biologist should conduct a survey during the appropriate blooming period for all special-status plants that have the potential to occur on the Project site prior to the start of construction. Surveys should be conducted following *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*, prepared by CDFW, dated March 20, 2018. The protocol can be found here: <https://www.wildlife.ca.gov/Conservation/SurveyProtocols#377281280-plants>. If special-status plants are found during surveys, the MND should outline which species of special-status plants will be impacted how the Project would be re-designed to avoid, minimize and/or mitigate impacts to those special-status plants.

The protocol states that “botanical field surveys should be comprehensive over the entire Project area, including areas that will be directly or indirectly impacted by the Project.” Riparian areas onsite, including the ephemeral stream, should be included in the survey area as there is moderate potential for special-status plant species occurrences. Indirect Project impacts could affect adjoining properties if the Project includes fuel reduction from vegetation modification, herbicide application, invasive species, and altered hydrology. The applicant should provide a copy of the special-status plant survey results to CDFW for review and acceptance.

Comment 6: Fencing Hazards

Issue: The Project may result in the use of open pipes used as fence posts, property line stakes, signs, etc. These structures mimic the natural cavities preferred by various bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality.

Recommendation: CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Further

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information on this subject may be found at: <https://ca.audubon.org/conservation/protect-birds-danger-open-pipes>.

REGULATORY REQUIREMENTS

Nesting Birds

CDFW has jurisdiction 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 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). Fully protected species may not be taken or possessed at any time (Fish and Game Code Section 3511). Migratory raptors are also protected under the federal Migratory Bird Treaty Act.

ENVIRONMENTAL DATA

CEQA requires that information developed in draft 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 (CNDDDB). The CNDDDB field survey form, online field survey form, and contact information for CNDDDB staff can be found at the following link: <https://wildlife.ca.gov/data/CNDDDB/submitting-data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

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 and Game Code, § 711.4; Pub. Resources Code, § 21089).

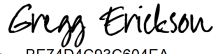
CONCLUSION

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

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Questions regarding this letter or further coordination should be directed to Ms. Mia Bianchi, Environmental Scientist, at (707) 210-4531 or Mia.Bianchi@wildlife.ca.gov; or Mr. Wes Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:

BE74D46936801FA
Gregg Erickson
Regional Manager
Bay Delta Region

cc: State Clearinghouse

REFERENCES

California Department of Fish & Wildlife (CDFW). 2020. California Natural Diversity Database (CNDDDB) Rarefind Electronic database. Sacramento, CA. Search of U.S. Geological Survey 7.5-minute quadrangles Glen Ellen. Accessed January 2021.

California Native Plant Society, Rare Plant Program. 2021. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org> [accessed 05 January 2021].

Lannoo, Michael (Editor). Amphibian Declines: The Conservation Status of United States Species. University of California Press, June 2005

U.S. Forest Service (USFS). 2016. Foothill yellow-legged frog conservation assessment in California. General Technical Report PSW-GTR-248, Pacific Southwest Reserach Station, U.S. Forest Service, Albany, CA, USA.

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ATTACHMENT

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: UPC19-0002 Turkey Farm Cannabis Cultivation and Processing

SCH No.: 2020120219

RECOMMENDED MITIGATION MEASURES	Responsibility for Implementation
<p><u>Mitigation Measure:</u> Lake and Streambed Alteration (LSA) The Project Proponent should submit another LSA Notification via the online Environmental Permit Information Management System (EPIMS) to cover stream-related Project activities on-site.</p>	<p>Project Applicant/ Qualified Biologist(s)</p>
<p><u>Mitigation Measure: Burrowing Owl</u> For an adequate environmental setting and impact analysis, and to reduce impacts to less-than-significant, CDFW recommends that the MND evaluate and quantify the amount of suitable burrowing owl habitat that would be impacted by Project activities. The Project area should consider all temporary and permanent impacts that may impact foraging habitat, including anywhere heavy equipment may occur on the site. After identifying all potential areas of suitable habitat, the MND should include a mitigation measure requiring a qualified biologist to conduct surveys following the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation survey methodology (see https://wildlife.ca.gov/Conservation/Survey/Protocols#377281284-birds). Surveys should encompass identified areas of burrowing owl foraging habitat and include a sufficient buffer zone to detect owls nearby that may be impacted. Time lapses between surveys or Project activities should trigger subsequent surveys including but not limited to a final survey within 24 hours prior to ground disturbance before construction equipment mobilizes to the Project area. The qualified biologist should have a minimum of two years of experience implementing the CDFW 2012 survey methodology resulting in detections. Detected burrowing owls should be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report, unless otherwise approved in writing by CDFW, and any eviction plan should be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a “take” avoidance, minimization, or mitigation measure;</p>	<p>Project Applicant/ Qualified Biologist</p>

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<p>therefore, off-site habitat compensation should be included in the eviction plan. Off-site habitat compensation should also be required for any nest burrows used within the last three year that would be removed. Habitat compensation acreages should be approved by CDFW, as the amount depends on site-specific conditions, and completed before Project construction. It should also include placement of a conservation easement and preparation and implementation of a long-term management plan.</p>	
<p><u>Mitigation Measure: Special Status Bat Species</u> The MND should clarify the scope of potential hibernation or roost sites that may be impacted by the Project. If buildings providing suitable bat hibernation or roost habitat are removed as part of the Project, these impacts are not adequately addressed in the CEQA document. For buildings/structures containing suitable bat habitat will be removed, a qualified biologist should conduct a bat habitat assessment of all buildings proposed for removal to determine presence of bats. CDFW should review and accept resumes of biologists proposing to conduct surveys for special-status bats to ensure each biologist possesses the appropriate specialized qualifications; such as 1) at least 2 years of experience conducting bat surveys that resulted in detections for the relevant species including the Project name, dates, and person who can verify the experience, and 2) the types of equipment used to conduct surveys. All buildings/structures with bats should be removed during seasonal periods of bat activity: Prior to maternity season – from approximately March 1 (or when night temperatures are above 45°F and when rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If removal must occur outside of these timeframes, a qualified biologist should conduct a survey to determine if maternity colonies are winter torpor bats are present. If present, the buildings/ structures should not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist.</p>	<p>Project Applicant/ Qualified Biologist(s)</p>
<p><u>Mitigation Measure: Foothill Yellow-Legged Frogs and Red-Bellied Newts</u> The MND should analyze all groundwork activities, such as grading and filling, that may potentially impact foothill yellow-legged frog and/or red-bellied newt terrestrial and aquatic habitat. It should also discuss all potentially significant impacts to the species. For any permanent Project impacts to foothill yellow-legged frog, red-bellied newt, or their habitat, CDFW recommends the MND include appropriate and effective compensatory mitigation by preserving like habitat of equal or greater habitat value. If the mitigation lands will be on-site, the draft MND should include a detailed map showing the preserved land and it should specify</p>	<p>Project Applicant/ Qualified Biologist(s)</p>

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<p>that the preserved land area will be protected in perpetuity under a conservation easement or deed restriction. CDFW recommends a qualified biologist experienced in the identification and life history of be onsite during all Project activities.</p>	
<p><u>Mitigation Measure: Special-Status Plant Surveys</u> A Qualified Biologist should conduct a survey during the appropriate blooming period for all special-status plants that have the potential to occur on the Project site prior to the start of construction. Surveys should be conducted following <i>Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities</i>, prepared by CDFW, dated March 20, 2018. The protocol can be found here: https://www.wildlife.ca.gov/Conservation/SurveyProtocols#377281280-plants. If special-status plants are found during surveys, the MND should outline which species of special-status plants will be impacted how the Project would be re-designed to avoid, minimize and/or mitigate impacts to those special-status plants.</p> <p>The protocol states that “botanical field surveys should be comprehensive over the entire Project area, including areas that will be directly or indirectly impacted by the Project.” Riparian areas onsite, including the ephemeral stream, should be included in the survey area as there is moderate potential for special-status plant species occurrences. Indirect Project impacts could affect adjoining properties if the Project includes fuel reduction from vegetation modification, herbicide application, invasive species, and altered hydrology. The applicant should provide a copy of the special-status plant survey results to CDFW for review and acceptance.</p>	<p>Project Applicant/ Qualified Biologist</p>
<p><u>Mitigation Measure: Fencing Hazards</u> CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Further information on this subject may be found at: https://ca.audubon.org/conservation/protect-birds-danger-open-pipes.</p>	<p>Project Applicant/ Qualified Biologist</p>