



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Bay Delta Region  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
(707) 428-2002  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



March 11, 2021

Governor's Office of Planning & Research

**Mar 12 2021**

**STATE CLEARINGHOUSE**

Mr. Seth Merdler  
NEPA/EIAP Program Manager  
United States Air Force  
411 Airmen Drive, Building 570  
Sacramento, CA 94535  
[Seth.Merdler@us.af.mil](mailto:Seth.Merdler@us.af.mil)

Subject: Invasive and Aquatic Species Management at Travis Air Force Base and Geographically Separated Units, Notification and Solicitation of Comments of a Draft Environmental Assessment, SCH No. 2021020214, Solano and Contra Costa Counties

Dear Mr. Merdler:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notification and Solicitation of Comments of a draft Environmental Assessment (EA) for Invasive and Aquatic Species Management at Travis Air Force Base (AFB) and Geographically Separated Units (GSUs) (Project).

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA) for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). 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, a Native Plant Protection Act (NPPA) Permit, a Lake and Streambed Alteration (LSA) Agreement, or approval under other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

CDFW has authority over actions that may disturb or destroy active nest sites or take birds. Fish and Game Code sections 3503, 3503.5, and 3513 protect birds, eggs, and nests. Migratory birds are also protected under the federal Migratory Bird Treaty Act.

Fully protected species, such as white-tailed kite (*Elanus leucurus*), may not be taken or possessed at any time (Fish and Game Code, §§ 3511, 4700, 5050, and 5515). Therefore, the draft EA should include measures to ensure complete avoidance of these species.

Mr. Seth Merdler  
United States Air Force  
March 11, 2021  
Page 2 of 6

## **PROJECT DESCRIPTION AND LOCATION**

The Project is the management of invasive species and vegetation across Travis AFB (5,137 acres) and seven GSUs (358 acres). The U.S. Air Force (USAF) is the Lead Agency. The Project is located in unincorporated Solano County and Contra Costa County. Project activities will include grazing, fuel break creation and maintenance, mechanical removal of vegetation, manual removal of vegetation, herbicide application, prescribed fire, and habitat enhancement. Work is expected to be conducted annually and will satisfy goals identified in the Integrated Natural Resources Management Plan, Invasive Plant Species Management Plan, Invasive Species Management Plan, Grazing Management Plan, Aquatic Pesticide Application Plan, and Wildland Fire Management Plan.

The draft EA should incorporate a full Project description, including reasonably foreseeable future phases of the Project, that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description:

- Project locations, including a Project map.
- Footprints of permanent Project features such as fuel breaks and temporarily impacted areas, such as staging areas, access routes, and temporary vegetation treatment.
- Area and plans for any ground disturbing activities, fencing, stationary machinery, landscaping, habitat restoration, prescribed fire, and grazing.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), livestock presence, artificial lighting/light reflection, noise, traffic generation, and other features.
- Vegetation treatment schedule, activities, equipment, and crew sizes.
- Targeted invasive species and any other vegetation that will be treated.
- Types of pesticides that will be used and description of label instructions

## **ENVIRONMENTAL SETTING**

The draft EA should provide sufficient information regarding the environmental setting ("baseline") to understand the Project's, and its alternative's, potentially significant impacts on the environment.

CDFW recommends that the draft EA provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including but not limited to all rare, threatened, or

Mr. Seth Merdler  
United States Air Force  
March 11, 2021  
Page 3 of 6

endangered species. The draft EA should describe aquatic habitats, such as wetlands and/or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site. Fully protected, threatened or 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:

- California tiger salamander (*Ambystoma californiense*), CESA and ESA listed as threatened
- California red-legged frog (*Rana draytonii*), ESA listed as threatened, California Species of Special Concern (SSC)
- California Ridgway's rail (*Rallus obsoletus obsoletus*), CESA and ESA listed as endangered, Fully Protected Species
- California black rail (*Laterallus jamaicensis coturniculus*), CESA listed as threatened, Fully Protected Species
- California least tern (*Sternula antillarum browni*), CESA and ESA listed as endangered, Fully Protected Species
- Tricolored blackbird (*Agelaius tricolor*), CESA listed as threatened
- Swainson's hawk (*Buteo swainsoni*), CESA listed as threatened
- Burrowing owl (*Athene cunicularia*), SSC
- Northern harrier (*Circus hudsonius*), SSC
- Saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*), SSC
- Short-eared owl (*Asio flammeus*), SSC
- Suisun song sparrow (*Melospiza melodia maxillaris*), SSC
- White-tailed kite, Fully Protected Species
- Salt marsh harvest mouse (*Reithrodontomys raviventris*), CESA and ESA listed as endangered, Fully Protected Species
- Suisun shrew (*Sorex ornatus sinuosus*), SSC
- Western pond turtle (*Emys marmorata*), SSC
- Longfin smelt (*Spirinchus thaleichthys*), CESA listed as threatened, ESA candidate for listing
- Conservancy fairy shrimp (*Branchinecta conservatio*), ESA listed as endangered, California Terrestrial and Vernal Pool Invertebrate of Conservation Priority (ICP)<sup>1</sup>
- Vernal pool tadpole shrimp (*Lepidurus packardii*), ESA listed as endangered, ICP
- Delta green ground beetle (*Elaphrus viridis*), ESA listed as threatened, ICP

---

<sup>1</sup> The list of California Terrestrial and Vernal Pool Invertebrates of Conservation Priority was collated during CDFW's Scientific Collecting Permit rulemaking process:  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

Mr. Seth Merdler  
United States Air Force  
March 11, 2021  
Page 4 of 6

- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), ESA listed as threatened, ICP
- Vernal pool fairy shrimp (*Branchinecta lynchi*), ESA listed as threatened, ICP
- Monarch butterfly (*Danaus plexippus* pop.1), ICP
- Hairy water flea (*Dumontia oregonensis*), ICP
- Western bumble bee (*Bombus occidentalis*), ICP
- Contra Costa goldfields (*Lasthenia conjugens*), ESA listed as endangered, California Rare Plant Rank (CRPR) 1B.1
- Soft salty bird's-beak (*Chloropyron molle* ssp. *molle*), ESA listed as endangered, NPPA rare, CRPR 1B.2
- Suisun thistle (*Cirsium hydrophilum* var. *hydrophilum*), ESA listed as endangered, CRPR 1B.1
- Two-fork clover (*Trifolium amoenum*), ESA listed as endangered, CRPR 1B.1
- Baker's navarretia (*Navarretia leucocephala* ssp. *bakeri*), CRPR 1B.1
- Carquinez goldenbush (*Isocoma arguta*), CRPR 1B.1
- Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*), CRPR 1B.1
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), CRPR 1B.1
- Mason's lilaeopsis (*Lilaeopsis masonii*), NPPA rare, CRPR 1B.1
- Mt. Diablo buckwheat (*Eriogonum truncatum*), CRPR 1B.1
- Alkali milk-vetch (*Astragalus tener* var. *tener*), CRPR 1B.2
- Brittscale (*Atriplex depressa*), CRPR 1B.2
- California alkali grass (*Puccinellia simplex*), CRPR 1B.2
- Delta tule pea (*Lathyrus jepsonii* var. *jepsonii*), CRPR 1B.2
- Heartscale (*Atriplex cordulata* var. *cordulata*), CRPR 1B.2
- Long-styled sand-spurrey (*Spergularia macrotheca* var. *longistyla*), CRPR 1B.2
- Marsh microseris (*Microseris paludosa*), CRPR 1B.2
- Pappose tarplant (*Centromadia parryi* ssp. *parryi*), CRPR 1B.2
- Saline clover (*Trifolium hydrophilum*), CRPR 1B.2
- San Joaquin spearscale (*Extriplex joaquinana*), CRPR 1B.2
- Suisun marsh aster (*Symphyotrichum lentum*), CRPR 1B.2
- Vernal pool smallscale (*Atriplex persistens*), CRPR 1B.2
- Bolander's water-hemlock (*Cicuta maculate* var. *bolanderi*), CRPR 2B.1
- Dwarf downingia (*Downingia pusilla*), CRPR 2B.2
- Slender-leaved pondweed (*Stuckenia filiformis* ssp. *alpina*), CRPR 2B.2

Mr. Seth Merdler  
United States Air Force  
March 11, 2021  
Page 5 of 6

Habitat descriptions and the potential for species occurrence should include information from multiple sources, such as aerial imagery; historical and recent survey data, field reconnaissance; scientific literature and reports; the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; and findings from positive occurrence databases such as the California Natural Diversity Database (CNDDDB). Based on the data and information from the habitat assessment, the draft EA should adequately assess which special-status species are likely to occur on or near the Project site, and whether they could be impacted by the Project.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://wildlife.ca.gov/Conservation/Survey-Protocols>.

Botanical surveys for special-status plant species, including those with a California Rare Plant Rank (<http://www.cnps.org/cnps/rareplants/inventory/>), must be conducted during the blooming period for all species potentially impacted by the Project within the Project area and adjacent habitats that may be indirectly impacted by, for example, changes to hydrology, and require the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants, and survey report requirements (<https://wildlife.ca.gov/Conservation/Plants>).

## **IMPACT ANALYSIS AND MITIGATION MEASURES**

The draft EA should discuss all direct and indirect impacts (temporary and permanent), including reasonably foreseeable impacts, that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Encroachments into riparian habitats, drainage ditches, wetlands, or other sensitive areas.
- Potential for impacts to special-status species.
- Loss or modification of breeding, nesting, dispersal, and foraging habitat, including vegetation removal, alteration of soils and hydrology, and removal of habitat structural features (e.g., snags, rock outcrops, overhanging banks).
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, livestock, or human presence.
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

Mr. Seth Merdler  
United States Air Force  
March 11, 2021  
Page 6 of 6

The draft EA should also identify reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to the impact. Although a project's impacts may be less-than-significant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact, e.g., reduction of habitat for a special-status species, should be considered cumulatively considerable.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the Project, USAF should describe all feasible mitigation measures to avoid potentially significant impacts in the draft EA and mitigate potentially significant impacts of the Project on the environment. This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the National Marine Fisheries Service, as applicable. USAF should also review the draft Solano Habitat Conservation Plan avoidance, minimization, and mitigation measures to inform and guide the Project impacts and measures. Project-specific measures should be incorporated as enforceable Project conditions to reduce impacts to biological resources to less-than-significant levels.

## ENVIRONMENTAL DATA

CDFW requests reporting any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data 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>.

If you have any questions, please contact Ms. Amanda Culpepper, Environmental Scientist, at [Amanda.Culpepper@wildlife.ca.gov](mailto:Amanda.Culpepper@wildlife.ca.gov); or Ms. Melanie Day, Acting Senior Environmental Scientist (Supervisory), at [Melanie.Day@wildlife.ca.gov](mailto:Melanie.Day@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
BE74D4C93C604EA...  
Gregg Erickson  
Regional Manager  
Bay Delta Region

ec: State Clearinghouse (SCH No. 2021020214)  
Andrew Chambers, CDFW Bay Delta Region  
Andrea Boertien, CDFW Bay Delta Region  
Robynn Swan, CDFW Bay Delta Region