



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

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Governor's Office of Planning & Research

May 20 2021

May 18, 2021

STATE CLEARINGHOUSE

Mr. Eric Wilberg
Solano County Department of Resource Management
675 Texas Street
Fairfield, CA 94533
ejwilberg@solanocounty.com

Subject: Turpin U-20-04, Negative Declaration, SCH No. 2021040583, Solano County

Dear Mr. Wilberg:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Negative Declaration (ND) from the County of Solano (County) for the Turpin U-20-04 Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW is submitting comments on the ND to inform the County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive 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. 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, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Susan Turpin

Objective: The Project will construct an approximately 4,738-square-foot barn-style event facility, 531-square-foot guest studio, 1,800-square-foot vacation rental home, and associated infrastructure such as a parking lot and outdoor seating areas. Primary Project activities include grading, excavation, trenching, building construction, concrete pouring, and landscaping.

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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Additional activities include construction of an approximately 4,596-square-foot home and 1,600-square-foot detached garage; however, it is unclear if these activities are part of the Project, as further described below.

Location: The Project is located on a parcel associated with 2208 Morrison Lane, approximately 2.5 miles west of the City of Fairfield, in unincorporated Solano County. The Project site is approximately 1,000 feet south of the intersection of Morrison Lane and Stonefield Lane. Stonefield Lane and South Putah Canal border the western and southern sides of the Project. The Project will occur on Assessor's Parcel Number 0153-140-240. The approximate Project centroid is Latitude 38.26282°N, Longitude 122.12637°W.

Timeframe: The ND does not specify a timeframe.

ENVIRONMENTAL SETTING

The Project site is located on a 25.02-acre undeveloped agricultural lot dominated by grassland and scattered shrubs. The Rockville Trails Preserve is approximately 0.20 miles west of the Project site and agricultural land dominates the landscape to the east and north. Very low-density housing and agricultural lands are present to the south.

The Putah South Canal, a channel that diverts water from Putah Creek, flows south along the western and southern border of the Project site. An unnamed drainage ditch approximately 430 feet north and 100 feet east of the Project site flows east to Suisun Creek. Suisun Creek has a mature riparian canopy and is approximately 0.50 miles east of the Project site. Special-status species with the potential to occur in or near the Project site include, but are not limited to, Swainson's hawk (*Buteo swainsoni*), listed as threatened pursuant to CESA; burrowing owl (*Athene cunicularia*), a California Species of Special Concern (SSC); American badger (*Taxidea taxus*), an SSC, and white-tailed kite (*Elanus leucurus*), a Fully Protected Species.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, such as Swainson's hawk, either during construction or over the life of the Project. Issuance of an ITP is subject to CEQA documentation; 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 significant modification to the Project and mitigation measures may be required in order to obtain an ITP.

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CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) and 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 CESA.

Lake and Streambed Alteration Agreement

CDFW requires an LSA 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, watercourses with a subsurface flow, and floodplains are subject to notification requirements. In those cases, CDFW will consider the CEQA document for the project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Raptors and Other Nesting Birds

CDFW also 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 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, may not be taken or possessed at any time (Fish and Game Code, §§ 3511, 4700, 5050, and 5515).

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. Based on the Project's avoidance of significant impacts on biological resources, in part through implementation of CDFW's below recommendations, CDFW concludes that **a Mitigated Negative Declaration would be more appropriate** for the Project.

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Project Description and Related Impact Shortcoming

The CEQA Guidelines require that the initial study includes “all phases of project planning, implementation, and operation” [Cal. Code Regs., tit. 14, § 15063, subd. (a)(1)]. In addition, an ND must include a brief description of the project and project location [Cal. Code Regs., tit. 14, § 15071, subds. (a) and (b)]. “Project” means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment (Cal. Code Regs., tit.14, § 15378). The ND identifies the Project as the construction of a barn-style event facility, a guest studio, and a vacation rental home (pages 8 – 9) and provides location maps, including an aerial imagery map of the parcel (Figure 3, page 8). The ND also notes that construction of a single-family home and a detached garage will occur on the same parcel, but is not considered part of the Project and does not appear to have been considered in the initial study (page 6). A site plan is provided including the barn-style event facility, the single-family residence, and a proposed road and driveway providing access to both portions of the parcel (Figure 5, page 10, and Appendix 6.2). Based on this information in the ND, it appears that the construction of the event facility and the single-family home are part of the same activity and should be considered together as the Project. In addition, the ND describes the square feet of the proposed buildings, but does not identify the footprint of the whole Project, including buildings, parking lots, driveways, and other areas where ground disturbing activities will occur. The Project description and location must be clear and should include all associated construction and ground-disturbing activities. Without this clarity, the Project could have undescribed or unforeseen potentially significant impacts to the environment.

To reduce impacts to less-than-significant, CDFW recommends including the construction of the approximately 4,596-square-foot home and 1,600-square-foot detached garage as part of the Project description and assessing whether the entire Project may have a significant effect on the environment. Alternatively, the ND should clarify which activities are subject to CEQA review under the ND, why described activities are considered separate projects under CEQA, and the type of CEQA review for each project. The Project footprint, including but not limited to, buildings, parking lots, roads, and driveways, should be clearly described, quantified (e.g., in acres) and depicted in the CEQA document.

Environmental Setting and Related Impact Shortcoming

The ND’s environmental setting states the Project area is agricultural, relatively flat, and that Putah South Canal flows along the western and southern borders of the Project site (page 6). In addition, the ND identifies that no trees are proposed for removal and that no permits from CDFW are required (page 20). The environmental setting does not describe the vegetation on-site, the potential special-status species that could occur in

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or near the Project site, or provide mitigation measures to reduce potentially significant impacts to less-than-significant. Without an understanding of the environmental setting and biological baseline conditions, it is not possible to determine potentially significant impacts the Project could have on the environment.

To reduce impacts to less-than-significant, CDFW recommends that a qualified biologist conduct a biological resource assessment of the Project site and adjacent habitat the Project could impact, and incorporate it into the initial study and CEQA document prior to approval of the CEQA document. A qualified biologist shall minimally hold a science-related bachelor's degree from an accredited university and have demonstrable experience with the species and habitats in Solano County.

Swainson's Hawk

The ND does not identify that Swainson's hawk, listed as threatened pursuant to CESA, may occur within the Project site which provides potential foraging habitat, or near the Project site which provides potentially suitable nesting habitat. Potentially suitable nesting trees exist in the oak woodland to the south of the Project site, other trees in the vicinity, and in the riparian habitat of Suisun Creek to the east. In addition, the agricultural land and open space near the Project provide potentially suitable foraging habitat. There are California Natural Diversity Database (CNDDDB) occurrences of nesting Swainson's hawk approximately 2 miles east of the Project site and approximately 4 miles to the south. In addition, two unprocessed CNDDDB records exist approximately 2.2 miles to the southwest, and the California Wildlife Habitat Relationships Predicted Habitat Suitability for the site is Medium Suitability. Swainson's hawks are present within the vicinity of the Project site and there is potentially suitable habitat for the species on-site and in the vicinity where the species could be impacted.

The breeding population of Swainson's hawks in California has declined by an estimated 91% since 1900 and the species continues to be threatened by on-going and cumulative loss of foraging habitat (CDFW 2016). Swainson's hawks could be disturbed by Project activities, resulting in potentially significant impact to Swainson's hawk through nest abandonment or reduced health and vigor of young. In addition, the ND does not propose compensatory mitigation for removal of Swainson's hawk foraging habitat. To reduce impacts to less-than-significant, CDFW recommends including the following Mitigation Measures.

Mitigation Measure BIO-1A: Swainson's Hawk Surveys

If Project activities are scheduled during the nesting season for Swainson's hawks (March 1 to September 15), prior to beginning work on this Project, a qualified biologist shall conduct surveys according to the *Recommended Timing and Methodology for*

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*Swainson's Hawk Nesting Surveys in California's Central Valley.*² Survey methods should be closely followed by starting early in the nesting season (late March to early April) to maximize the likelihood of detecting an active nest (nests, adults, and chicks are more difficult to detect later in the growing season because trees become less transparent as vegetation increases). Surveys shall be conducted: 1) within a minimum 0.5-mile radius of the Project site or a larger area if needed to identify potentially impacted active nests, and 2) for at least the two survey periods immediately prior to initiating Project-related construction activities. Surveys shall occur annually for the duration of the Project. The qualified biologist shall have a minimum of two years of experience implementing the survey methodology resulting in detections. If active Swainson's hawk nests are detected, the Project shall implement a 0.5-mile construction avoidance buffer around the nest until the nest is no longer active as determined by a qualified biologist. If take of Swainson's hawk cannot be avoided, the Project shall consult with CDFW pursuant to CESA and obtain an ITP. CDFW Bay Delta Region staff is available to provide guidance on the ITP application process.

Mitigation Measure BIO-1B: Swainson's Hawk Habitat Mitigation

Loss of foraging habitat shall be mitigated at the appropriate ratio following CDFW's (then Fish and Game) *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California*³ prior to Project construction, and accepted by CDFW in writing. The Project shall be assumed to be within one mile of an active nest tree and mitigate at a 1:1 mitigation to impact ratio, unless protocol-level Swainson's hawk surveys are conducted demonstrating that Swainson's hawks are not nesting within one mile of the Project. Habitat mitigation shall include permanent preservation of foraging habitat through a conservation easement and implementing and funding a long-term management plan in perpetuity. Please be advised that the draft Solano Multispecies Habitat Conservation Plan, Section 6.4.8 and Figure 4-21, identifies 1:1 Swainson's hawk foraging habitat mitigation for the Project site (see: <https://www.scwa2.com/solano-multispecies-habitat-conservation-plan/>).

Burrowing Owl

The ND does not identify that burrowing owl, a California Species of Special Concern, may occur within the Project site, which provides potential foraging habitat and potential breeding and overwintering habitat, which also occurs adjacent to the Project site where the species could be impacted. There are two documented occurrences of burrowing owl within 4 and 4.5 miles southeast of the Project site according to the CNDDDB, and the California Wildlife Habitat Relationships Predicted Habitat Suitability for the site is High Suitability. In accordance with CDFW's *Staff Report on Burrowing Owl Mitigation*,

² Swainson's Hawk Technical Advisory Committee, 2000.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&inline>

³ CDFW, 1994. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83992&inline>

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*Appendix C: Habitat Assessment and Reporting Details*⁴ (CDFW 2012 Staff Report), owls may be disturbed up to 1,640 feet (500 meters) from a project. Burrowing owls are present within the vicinity of the Project site and there is potentially suitable habitat for the species on and adjacent to the site.

The Project could result in burrowing owl nest abandonment, loss of young, reduced health and vigor of owlets, or injury or mortality of adults. Additionally, the Project would result in a permanent reduction of burrowing owl habitat in Solano County. Burrowing owls are a California Species of Special Concern due to population decline and breeding range retraction. Based on the above, the Project may potentially significantly impact burrowing owls. To reduce impacts to less-than-significant CDFW recommends the following Mitigation Measures.

Mitigation Measure BIO-2A: Burrowing Owl Habitat Assessment, Surveys, and Avoidance

Prior to Project activities, a habitat assessment shall be performed following *Appendix C: Habitat Assessment and Reporting Details* of the CDFW 2012 Staff Report. The habitat assessment shall extend at least 150 meters from the Project area boundary and include burrows and burrow surrogates. If the habitat assessment identifies potentially suitable burrowing owl habitat, then a qualified biologist shall conduct surveys following the CDFW 2012 Staff Report survey methodology. Surveys shall encompass the Project site and a sufficient buffer zone to detect owls nearby that may be impacted commensurate with the type of disturbance anticipated, as outlined in the CDFW 2012 Staff Report, and include burrow surrogates such as culverts, piles of concrete or rubble, and other non-natural features, in addition to burrows and mounds. Time lapses between surveys or Project activities shall trigger subsequent surveys, as determined by a qualified biologist, including but not limited to a final survey within 24 hours prior to ground disturbance. The qualified biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology resulting in detections. Detected nesting burrowing owls shall be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report and any passive relocation plan for non-nesting owls shall be subject to CDFW review.

Please be advised that CDFW does not consider exclusion of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a “take” avoidance, minimization, or mitigation measure for the reasons outlined below. Therefore, to mitigate the impacts of potentially evicting burrowing owls to less-than-significant, Mitigation Measure BIO-2B outlined below should require habitat compensation with the acreage amount identified in any eviction plan. The long-term demographic consequences of exclusion techniques have not been thoroughly evaluated, and the survival rate of excluded owls is unknown. Burrowing owls are dependent on burrows at

⁴ Department of Fish and Wildlife (then Fish and Game), 2012.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>

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all times of the year for survival or reproduction, therefore eviction from nesting, roosting, overwintering, and satellite burrows or other sheltering features may lead to indirect impacts or “take” which is prohibited under Fish and Game Code section 3503.5. All possible avoidance and minimization measures should be considered before temporary or permanent exclusion and closure of burrows is implemented to avoid “take.”

Mitigation Measure BIO-2B: Burrowing Owl Habitat Mitigation

If the Project would impact an unoccupied nesting burrowing owl burrow or burrow surrogate (i.e., a burrow known to have been used in the past three years for nesting), or an occupied burrow (where a non-nesting owl would be evicted as described above), the following habitat mitigation shall be implemented prior to Project construction:

Impacts to each nesting site shall be mitigated by permanent preservation of two occupied nesting sites with appropriate foraging habitat within Solano County, unless otherwise approved by CDFW, through a conservation easement and implementing and funding a long-term management plan in perpetuity. The same requirements shall apply for impacts to non-nesting evicted owl sites.

Impacts to burrowing owl foraging habitat shall be mitigated by permanent preservation of foraging habitat at a 1:1 mitigation to impact ratio, in the same manner described above, and accepted by CDFW in writing. The CDFW 2012 Staff Report states, “current scientific literature supports the conclusion that mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat area for breeding, foraging, wintering, dispersal...” Please be advised that the draft Solano Multispecies Habitat Conservation Plan, Section 6.4.9 and Figure 4-22, identifies 1:1 burrowing owl foraging habitat mitigation for the Project site (see: <https://www.scwa2.com/solano-multispecies-habitat-conservation-plan/>).

The Project may implement alternative methods for preserving habitat with written acceptance from CDFW.

Nesting Birds

The ND provides an aerial map of the Project site which shows grassland and shrubs on site and mature trees adjacent to the Project’s southern border (Figure 3, page 8). This vegetation may provide nesting habitat for a variety of native nesting birds. Bird species that may be considered common have still declined over the past 50 years. Human activity and removal of habitat has contributed to the loss of a significant proportion of the total number of birds in the United States and Canada since the 1970s (Rosenburg et al. 2019). Nesting birds may be disturbed by Project noise or human presence, which could lead to nest abandonment or reduced health and vigor of young, a potentially significant impact. To reduce impacts to less-than-significant, CDFW recommends including the following Mitigation Measure.

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Mitigation Measure BIO-3: Nesting Bird Surveys

If construction, grading, or other Project-related activities are scheduled during the nesting season, February 1 to September 1, a focused survey for active nests shall be conducted by a qualified biologist within 7 days prior to the beginning of Project-related activities. If an active nest is found, the qualified biologist shall delineate a no-work-zone buffer distance around the nest that is site and species specific using high visibility fencing or flagging. The buffer distance shall be specified to protect the bird's normal behavior and prevent nesting failure or abandonment. No work shall occur within the no-work-zone until the nest is no longer active as determined by a qualified biologist. If a lapse in Project-related work of 7 days or longer occurs, another focused survey shall occur before Project work is reinitiated.

Special-Status Plants

The ND does not identify any special-status plants with potential to occur in the area. While the Project site is agricultural land, it appears from the aerial imagery in the ND that various shrubs and other vegetation occur on-site, and that the Project site is not regularly tilled or planted with row crops. According to the CNDDDB, numerous special-status plants occur within five miles of the Project site, including pappose tarplant (*Centromadia parryi* ssp. *parryi*), California Rare Plant Rank (CRPR) 1B.2; holly-leaved ceanothus (*Ceanothus purpureus*), CRPR 1B.2; and Napa bluecurls (*Trichostema ruygtii*), CRPR 1B.2; among others. The Project has the potential to crush and kill special-status plants and could significantly impact special-status plants on-site. Special-status plants could also be indirectly impacted by the Project through, for example, changes to hydrology or introduction of invasive species. To reduce impacts to less-than-significant, CDFW recommends the following Mitigation Measure.

Mitigation Measure BIO-4: Special-Status Plant Habitat Assessment and Surveys

A qualified biologist shall conduct a habitat assessment of the Project site and identify potential for special-status plants to occur on-site and adjacent to the site where plants could be indirectly impacted. If the habitat assessment indicates potential for special-status species to occur, then a qualified biologist shall conduct surveys during the appropriate blooming period for all special-status plants that have the potential to occur on and adjacent to the Project site prior to the start of ground-disturbing activities. Surveys shall be conducted following *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*⁵. If special-status plants are found during surveys, the Project shall be re-designed to avoid impacts to special-status plants. If impacts to any special-status plants cannot be avoided completely during construction, the Project shall provide mitigation including off-site

⁵ Department of Fish and Wildlife, 2018. <https://www.wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>

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habitat preservation or another method accepted in writing by CDFW. The qualified biologist shall be knowledgeable about plant taxonomy, familiar with plants of the region, and have experience conducting botanical field surveys according to vetted protocols.

American Badger

The Project is located within grassland habitat that may be suitable for American badger, a California Species of Special Concern. Badgers range⁶ throughout most of California and can dig burrows in a single day; therefore, the species may occupy the Project site and adjacent habitat prior to Project construction (Ministry of Environment Ecosystems 2007 as cited in Brehme et al. 2015). The citizen scientist tool iNaturalist documents a badger record approximately 5 miles southwest of the Project site. Additionally, the California Wildlife Habitat Relationships Predicted Habitat Suitability for the site is Medium Suitability. This information confirms the species has occurred in the vicinity of the Project site and could use it and adjacent habitat.

The Project may result in injury or mortality to adult or young badgers, or burrow abandonment. Therefore, project impacts to American badger would be potentially significant.

To reduce impacts to less-than-significant, CDFW recommends that the ND: (1) further analyze the potential for American badger to occur on and adjacent to the Project site, and (2) include mitigation measures to ensure impacts are reduced to less-than-significant. These measures may include a qualified biologist surveying for the species including adjacent habitat prior to construction, avoiding occupied burrows including a sufficient buffer approved by CDFW, and preparing and implementing a CDFW-approved relocation plan if badgers are found on or adjacent to the Project site.

GENERAL SUGGESTIONS

In addition to the above recommendations, CDFW encourages landscaping using native trees and shrubs to benefit native wildlife such as nesting birds and insect pollinators. The removal of habitat for birds from human activities has contributed to the loss of a significant proportion of birds in the United States and Canada since the 1970s (Rosenburg et al. 2019). Similarly, insect pollinators such as monarch butterflies and native bees have declined drastically relative to 1990 levels (Xerces Society Western Monarch Thanksgiving Count 2021, Xerces Society et al. 2018, Forister et al. 2011). Planting native trees, shrubs, and flowering species, is an opportunity to improve conditions for native birds and insects. It is unclear in the ND what plant species are proposed for the landscaping of the Project site (Appendix 6.2), and CDFW

⁶ CDFW maintains range maps and life history accounts for all terrestrial species in California. The American badger range map is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2598&inline=1>

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recommends native species such as valley oaks (*Quercus lobata*), western redbud (*Cercis occidentalis*), and narrow leaf milkweed (*Asclepias fascicularis*) where possible.⁷

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 CNDDDB. The CNNDDB 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>.

FILING FEES

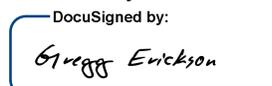
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the 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 ND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Ms. Amanda Culpepper, Environmental Scientist, at amanda.culpepper@wildlife.ca.gov or Ms. Melanie Day, Senior Environmental Scientist (Supervisory), at melanie.day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

BE74D4C93C804EA
Gregg Erickson
Regional Manager
Bay Delta Region

⁷ For further native species recommendations and planting tips, review the Willis L. Jepson Chapter of the California Native Plant Society document *Native Landscape Planting Guide*: https://jepson.cnps.org/images/horticulture/plans/willis_jepson-planting_guide.pdf and the Xerces Society document *Pollinator Plants: California*: https://xerces.org/sites/default/files/2018-05/17-045_02_XercesSoc_Pollinator-Plants_California_web-3page.pdf

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REFERENCES

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