



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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

July 21 2021

STATE CLEARINGHOUSE

July 21, 2021

Ms. Nedzlene Ferrario
Solano County
675 Texas Street, Suite 5500
Fairfield, CA 94533
nferrario@solanocounty.com

Subject: English Creek Estates-Phase 2, Mitigated Negative Declaration,
SCH No. 2021060701, Solano County

Dear Ms. Ferrario:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from Solano County (County) for the English Creek Estates-Phase 2 (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ CDFW previously provided comments on Phase 1 of the Project in the Lands of West Minor Subdivision MS 14-03 MND (SCH No. 2015032031).

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 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, a Lake and Streambed Alteration (LSA) Agreement, 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: Clifford and Linda Neal

Objective: The Project would subdivide a 14.81-acre lot into four residential lots consisting of 2.50, 2.50, 2.54, and 7.27 acres each. The Project anticipates construction

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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of single-family homes with associated driveways, septic system leach fields, and other infrastructure on each lot. Primary Project activities include grading, excavation, trenching, building construction, concrete pouring, and construction of leach fields.

Location: The Project is located immediately northeast of the intersection of Cantelow Road and English Hills Road in unincorporated Solano County, approximately one mile northwest of the City of Vacaville. The approximate centroid of the Project is Latitude 38.4195°N, Longitude 121.99634°W and the Assessor's Parcel Number is 0105-110-690.

Timeframe: The MND does not specify a Project timeframe.

ENVIRONMENTAL SETTING

The Project is located on an approximately 14.81-acre undeveloped parcel. The Project site is undeveloped non-native grassland with clusters of oak trees (*Quercus* sp.), groves of willows (*Salix* sp.), and walnut trees (*Juglans* sp.). English Creek flows through the site from northeast to southwest. The Project site was burned during the 2020 LNU Complex fire, but some vegetation along English Creek remains intact. The surrounding area consists of agricultural land, rangeland, low density ranchette-style housing, and blue oak (*Q. douglasii*), valley oak (*Q. lobata*) and interior live oak (*Q. wislizeni*) woodlands. Special-status species with the potential to occur in or near the Project site include, but are not limited to, California tiger salamander (*Ambystoma californiense*), listed as threatened pursuant to CESA and the federal Endangered Species Act (ESA); Swainson's hawk (*Buteo swainsoni*), listed as threatened pursuant to CESA; California red-legged frog (*Rana draytonii*), listed as threatened pursuant to ESA and a California Species of Special Concern (SSC); foothill yellow-legged frog, Northwest/North Coast clade (*Rana boylei*), an SSC; western pond turtle (*Emys marmorata*), an SSC; burrowing owl (*Athene cunicularia*), an SSC; American badger (*Taxidea taxus*), an SSC; white-tailed kite (*Elanus leucurus*), a Fully Protected Species.

REGULATORY REQUIREMENTS

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. The MND identifies that English Creek runs through the Project site and will be protected with a

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50-foot development setback (MND pages 6 and 13). If Project activities would occur within the 50-foot protective buffer, including vegetation treatment or installation of crossings, these activities would likely require a Notification. In such 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.

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 or California tiger salamander, 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.

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) & 21083; 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 CESA.

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, & 5515).

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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.

Environmental Setting and Related Impact Shortcoming

California Tiger Salamander

The Project is within the range² of California tiger salamander (CTS), listed as threatened pursuant to CESA and the ESA. CTS rely on vernal pools for breeding and upland grassland with burrows to complete their life cycle. The Project site includes grassland that could be used as upland habitat and is identified as high suitability habitat for CTS by CDFW's California Wildlife Habitat Relationships model. The California Natural Diversity Database (CNDDDB) documents that CTS are known to occur approximately 8.5 miles to the south of the Project. CTS in Solano County continue to be threatened by habitat loss and fragmentation, and potential take of individuals could significantly impact the population (U.S. Fish and Wildlife Service (USFWS)^a, 2017). Project activities including trenching and grading have the potential to incidentally take CTS, a potentially significant impact. To reduce impacts to less-than-significant, CDFW recommends surveying the Project site for CTS habitat prior to ground disturbing activities. If habitat occurs on-site, the County should consult with USFWS pursuant to the ESA and CDFW pursuant to CESA, as an ITP may be warranted. CDFW Bay Delta Region staff is available to provide guidance on the ITP application process.

California Red-Legged Frog

The Project is within the range³ of the California red-legged frog, a federally listed as threatened species and SSC. The nearest California Natural Diversity Database (CNDDDB) occurrence is approximately 8.8 miles west of the Project site. California red-legged frogs require a variety of habitats, including aquatic breeding habitats and upland dispersal habitats. In addition, a lack of documented records does not indicate species absence as the CNDDDB is a positive-indicator-only database. Breeding sites of the species are in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons. Additionally,

² CDFW maintains range maps and life history accounts for all terrestrial and semi-terrestrial species in California. The California tiger salamander range map is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=1417&inline=1>

³ The California red-legged frog range map is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=7104&inline=1>

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California red-legged frogs frequently breed in artificial impoundments such as stock ponds (USFWS 2002). Breeding sites are generally found in deep, still, or slow-moving water (>2.5 feet) and can have a wide range of edge and emergent cover amounts. California red-legged frogs can breed at sites with dense shrubby riparian or emergent vegetation, such as cattails or overhanging willows, or can proliferate in ponds devoid of emergent vegetation (i.e., stock ponds). Habitat includes nearly any area within one to two miles of a breeding site that stays moist and cool through the summer; this includes non-breeding aquatic habitat in pools of slow-moving streams, perennial or ephemeral ponds, and upland sheltering habitat such as rocks, small mammal burrows, logs, densely vegetated areas, and even man-made structures (i.e., culverts, livestock troughs, spring-boxes, and abandoned sheds) (USFWS_b 2017). California red-legged frog populations throughout the State have experienced ongoing and drastic declines and many have been extirpated (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, mining, overgrazing by cattle, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs are the primary threats to the species (Thomson et al. 2016, USFWS_b 2017).

The Project could injure or kill California red-legged frogs if they occur on-site. Therefore, Project activities have the potential to significantly impact California red-legged frog. To reduce impacts to less-than-significant, CDFW recommends the following Mitigation Measure.

Mitigation Measure BIO-5: California Red-Legged Frog Habitat Assessment and Surveys

At least two weeks prior to the commencement of ground-disturbing activities, the Project area and nearby vicinity, including a minimum 500-foot radius surrounding the Project area, shall be assessed by a Qualified Biologist for the presence of California red-legged frog individuals and habitat features. Habitat features include both aquatic habitat such as plunge pools and ponds and terrestrial habitat such as burrows. The results of the habitat feature assessment shall be submitted to CDFW for written acceptance prior to starting Project activities. If California red-legged frogs are encountered during the assessment or Project activities, the Project shall not proceed or all work shall cease, and CDFW shall immediately be notified. Work shall not proceed until the frog, through its own volition, moves out of harm's way and CDFW has provided permission in writing to proceed with the Project. If California red-legged frog is encountered, additional approvals from USFWS may be necessary pursuant to ESA.

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Western Pond Turtle

The Project is within the range⁴ of western pond turtle, an SSC. The Project site contains suitable aquatic habitat and is approximately four miles northwest from a CNDDDB occurrence of western pond turtle. Unprocessed data from CNDDDB identifies western pond turtle occurrences within approximately 2.4 miles south of the Project. Western pond turtles can move more than four miles up or down stream; therefore, the Project area is within the mobility range of these observations (Holland 1994). The species may also survive outside of aquatic habitat for several months in uplands up to several hundred feet from aquatic habitat (Purcell et al. 2017; Zaragoza et al. 2015).

The Project may result in loss of western pond turtle adults, young, or their nests, or disturbance to this species from construction activities. Western pond turtle is declining throughout its range, primarily due to loss of habitat from urbanization and conversion to agriculture (Spinks et al. 2003). Additionally, bouts of prolonged drought have exacerbated species decline (Purcell et al. 2017). Based on the above, the Project would potentially substantially adversely affect western pond turtle. Therefore, Project impacts to western pond turtle would be potentially significant. To reduce impacts to less-than-significant, CDFW recommends the following Mitigation Measure.

Mitigation Measure BIO-6: Western Pond Turtle Habitat Assessment, Surveys, and Relocation

A qualified biologist shall conduct a habitat suitability assessment of the Project site to determine where western pond turtles may occur in or adjacent to the Project. In areas of suitable habitat, the qualified biologist shall conduct a pre-construction survey for the species within 24 hours prior to construction activities before construction equipment mobilizes to the Project area. The qualified biologist shall have a minimum of two years conducting habitat assessments and surveys for western pond turtles, with detections. If any pond turtles or their nests are found, the biologist shall prepare a relocation plan and submit it to CDFW for written acceptance, and then implement the plan. Construction activities shall avoid all pond turtles and their nests including an appropriate buffer as determined by the qualified biologist.

Foothill Yellow-Legged Frog

The Project is within the range⁵ of the Northwest/North Coast clade of foothill yellow-legged frog, an SSC, and CNDDDB occurrences exist within four miles to the south of the

⁴ The western pond turtle range map is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2658&inline=1>

⁵ The foothill-yellow-legged frog range map is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=1501&inline=1>

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Project. Different life stages of the species use a variety of habitat types for development, foraging, and overwintering (Thompson et al. 2016). The species utilizes upland habitats adjacent to streams and have been observed 164 feet away from streams under rocks or other refugia (Nussbaum et al. 1983; Thompson et al. 2016; Zweifel 1955). Little information is known about foothill yellow-legged frog terrestrial movements and the species may travel farther from streams. The species also occur in swales or other moist areas.

The Northwest/North Coast genetic clade of foothill yellow-legged frog has been extirpated from much of the southern segment of its range in the San Francisco Bay Area and is at risk from urbanization, severe wildland fires, and climate change (*ibid.*). The Project may result in injury or mortality to foothill yellow-legged frog through crushing, killing, or injuring individuals from vehicles, equipment, and workers during Project activities. Project impacts to foothill yellow-legged frog would be potentially significant. To reduce impacts to less-than-significant, CDFW recommends the MND incorporate the below Mitigation Measure.

Mitigation Measure BIO-7: Foothill-Yellow Legged Frog Habitat Assessment, Surveys, and Relocation

A qualified biologist shall conduct a habitat suitability assessment in the vicinity of the Project to determine where foothill yellow-legged frogs may occur in or adjacent to the Project area, including 500 feet upstream and downstream of the Project area and 50 feet from the streambed. If suitable habitat is identified, the biologist shall provide a foothill yellow-legged frog survey methodology to CDFW for review and approval a minimum of two weeks prior to Project construction. No Project activities shall begin until foothill yellow-legged frog surveys have been completed using a method approved by CDFW in writing. The survey methodology will target all life stages and include wet and dry stream surveys as possible. Surveys within the Project area will include searching cavities under rocks and logs, within vegetation such as sedges and other clumped vegetation, and under undercut banks. Surveys should be conducted at different times of day and under variable weather conditions if possible. The qualified biologist shall also conduct a pre-construction survey for the species within 24 hours prior to construction activities before construction equipment mobilizes to the Project area. The qualified biologist shall have a minimum of two years conducting habitat assessments and surveys for foothill yellow-legged frog, with detections. If any foothill yellow-legged frogs are found, the biologist shall prepare an avoidance, minimization, and relocation plan and submit it to CDFW for written acceptance, and then implement the plan.

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American Badger

The Project is within the range⁶ of the American badger, an SSC. The Project is located within grassland habitat that may be suitable for American badger. Badgers range 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). Additionally, the California Wildlife Habitat Relationships Predicted Habitat Suitability for the site is High Suitability. A CNDDDB badger occurrence exists approximately 3.8 miles southeast of the Project and an unprocessed CNDDDB occurrence is about 8.6 miles east. 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 MND: (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 MND what plant species, if any, are proposed for the landscaping of the Project site and these details have likely not yet been planned (Appendix C). If landscaping would occur, CDFW recommends

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

MINOR GRAMMATICAL COMMENT

CDFW appreciates that the County has incorporated comments from our April 6, 2015 letter regarding mitigation measures for Swainson's hawk and burrowing owl. Please be advised that Mitigation Measure BIO-1 incorrectly identifies "Swain Hawk" in the title and should be corrected to "Swainson's Hawk."

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 CNDD The CNDD field survey form, online field survey form, and contact information for CNDD staff can be found at the following link: <https://wildlife.ca.gov/data/CNDD/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 MND 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 (707) 428-2075 or

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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amanda.culpepper@wildlife.ca.gov, or Ms. Melanie Day, Senior Environmental Scientist (Supervisory), at melanie.day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Stacy Sherman

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Stacy Sherman

Acting Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2021060701)

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