State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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October 7, 2021

Mr. John McDowell
County of Napa
1195 Third Street, Suite 210
Napa, CA 94559
john.mcdowell@countyofnapa.org

Subject: Chiles Pope Bridge Replacement Project, Mitigated Negative Declaration, SCH No. 2021090076, Napa County

Dear Mr. McDowell:

California Department of Fish and Wildlife (CDFW) personnel reviewed the Mitigated Negative Declaration (MND) for the Chiles Pope Bridge Replacement Project (Project). CDFW is submitting comments, as a Responsible Agency, on the MND to inform the County of Napa (County), as Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

CDFW is also a Trustee Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for the conservation, protection, and management of the State's biological resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386).

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a California Endangered Species Act (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, either during construction or over the life of the Project. **The Project has the potential to result in take of northern spotted owl (*Strix occidentalis caurina*), a CESA listed as threatened species, as described in further detail below.** Issuance of a CESA 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 a CESA 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, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless

the CEQA Lead Agency makes and supports Findings and a Statement of Overriding Consideration (SOC). The CEQA Lead Agency's SOC does not eliminate the project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

CDFW requires a Lake and Streambed Alteration (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 Project would impact Chiles Creek and associated riparian habitat; therefore, CDFW recommends that the MND includes a mitigation measure requiring the Project to obtain an LSA Agreement from CDFW, as further described below**. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

PROJECT LOCATION AND ENVIRONMENTAL SETTING

The Project is located at Chiles Creek where is passes underneath Chiles Pope Valley Road at Chiles Pope Bridge in an unincorporated area of Napa County, State of California; Latitude 38.519ºN, Longitude 122.349ºW. The Project site is located approximately 7.6 miles northeast of the Town of Yountville, approximately 6.5 miles east of the City of St. Helena, and approximately 2 miles north of Lake Hennessey and the Chiles Pope Valley Road and CA-128 intersection.

Chiles Creek is a perennial stream that is a tributary to Lake Hennessey, thence Conn Creek, thence the Napa River. Chiles Creek and the habitats surrounding support special-status plants (e.g., Colusa layia (*Layia septentrionalis*), a California Rare Plant Rank 1B.2 species, which are plants that are considered by the ranking system as rare, threatened, or endangered in California and elsewhere (see: https://www.cnps.org/rare-plants/cnps-rare-plant-ranks) and special-status wildlife such as: California red-legged frog (CRLF; *Rana draytonii*), listed as threatened under the Federal Endangered Species Act and a California Species of Special Concern (SSC); Northwest/North Coast clade of foothill yellow-legged frog (FYLF; *Rana boylii*), an SSC; western pond turtle (WPT; *Actinemys marmorata*), an SSC; pallid bat (*Antrozous pallidus*), an SSC; Townsend's big-eared bat (*Corynorhinus townsendii*), an SSC; and western red bat (*Lasiurus blossevillii*), an SSC. Native vegetation communities within the Project area include White Alder (*Alnus rhombifolia*) Forest Alliance and Mixed Oak (*Quercus* spp.) Forest Alliance.

PROJECT DESCRIPTION

The Project would replace the approximately 85-foot long, 25-foot wide three-span, structurally deficient Chiles Pope Bridge over Chiles Creek with an approximately 105-foot long, 26-foot wide two-span cast-in-place concrete slab bridge. The bottom of the new bridge deck would be approximately 1 to 2 feet above the estimated 100-year storm water surface elevation and supported by three abutments (instead of four abutments supporting the existing bridge). Abutments 1 and 3 would be installed on the south and north sides of the creek, respectively, outside top of bank and within the roadway. Abutment 2 would be installed within the center of the creek channel. Additionally, four soldier pile concrete retaining walls would be installed. Retaining Walls 1 and 2 would be installed on the downstream and upstream right banks, respectively. Retaining Walls 3 and 4 (RW3 and RW4) would be installed on the downstream and upstream left banks, respectively. Pile installation for the retaining walls and abutments would be performed from the roadway and may be installed prior to removal of the existing bridge. Except for RW4, after the removal of the existing bridge and once the piles are in place, excavation and installation of wall and abutment facing would be constructed from within the creek. A temporary heavy equipment access road down into the creek would be created by grading the roadway approach and the creek bank immediately upstream of the existing bridge. Prior to in-stream work, a temporary stream diversion consisting of an upstream and downstream coffer dam and corrugated metal pipe or high-density polyethylene pipe to bypass flow would be installed. Construction of RW4 would be conducted at the location of the temporary access road after it is removed, and without the use of heavy equipment in the creek.

In addition to removing the existing bridge, the project would remove portions of the existing roadway approach within the limits of the new bridge (at Abutments 1 and 3 and RW3). These existing approaches consist of a combination of previous fill and native material, which would be off-hauled and disposed of off-site. Vegetation adjacent to the existing road and existing bridge would be removed to accommodate Project activities. The roadway would be closed to traffic for approximately 9 months to construct the bridge superstructure in a single phase.

COMMENTS AND CONCERNS

Identify Responsible Agencies

CDFW recommends that the MND clearly identify the Responsible Agencies, including CDFW, expected to use the Project's MND in their decision making; provide a list of permits and other approvals required to implement the Project, including an LSA Agreement issued by CDFW; and provide a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies (Cal. Code Regs., tit. 14, § 15124, subd. (d)(1)(A)-(C)).

Lake and Streambed Alteration

CDFW recommends the MND include a mitigation measure requiring the Project to submit an LSA Notification to CDFW, obtain an LSA Agreement prior to Project construction, and comply with the Agreement. Any other resource agency permits or approvals should be required in a mitigation measure, such as Clean Water Act permitting from the Army Corps of Engineers and Water Quality Control Board, or a Biological Opinion from the U.S. Fish and Wildlife Service (USFWS). Requiring such permits as a mitigation measure ensures that the Project obtains the required permits protecting the environment and reducing impacts.

Riparian Habitat

The Project would permanently impact riparian habitat and vegetation growing along Chiles Creek, and therefore, the Project proponent would need to notify CDFW per Fish and Game Code section 1602, subdivision (a)(1) prior to impacting Chiles Creek.

In California, over 90% of the riparian and floodplain vegetation has been lost to development, land conversion, and channelization projects, compared to historical levels. In Napa County, riparian woodlands and forests only cover approximately 2% of the total land area; and riparian areas in the West provide habitat for more species of birds than all other western vegetation combined (e.g., 80% of neotropical migrant species (i.e., songbirds) depend on riparian areas for nesting or migration) (Napa County Resource Conservation District). Therefore, permanent impacts to riparian habitat along Chiles Creek would be potentially significant.

To reduce impacts to less-than-significant, CDFW recommends the following mitigation measure:

> *Permanent impacts to Chiles Creek shall be mitigated by either on-site or off-site restoration within the same stream or watershed at a minimum 3:1 mitigation to impact ratio for the linear distance and square feet permanently impacted. Temporary impacts shall be restored onsite at a 1:1 ratio. A restoration plan shall be prepared and implemented within the same year that Project construction is completed. The plan shall be prepared by a Qualified Biologist and shall include a minimum 80 percent survival and cover for success criteria, maintenance, and monitoring of plantings for five years. If success criteria are not met, replacement planting, maintenance, and monitoring shall be required for an additional five years. If the Project must remove trees from the riparian corridor of Chiles Creek, compensatory tree plantings shall be replanted on-site or at an off-site location approved by CDFW at the following ratios:*
>
> - *1:1 for non-native trees*

- *3:1 for native trees (excluding oaks)*
- *4:1 for oak trees between 5 and 10 inches diameter at breast height (DBH)*
- *5:1 for oak trees between 10 and 15 inches DBH; and*
- *10:1 for oak trees greater than 15 inches DBH*

Oaks shall be sourced using locally procured trees of the same species; and they shall be maintained and monitored for a minimum of five years. Planted oak trees shall achieve an 80 percent survival rate after five years and annual monitoring reports shall be provided to CDFW. If tree plantings have not achieved at least 80 percent survival after 5 years, new trees shall be planted and monitored for an additional 5 years to achieve 80 percent survival. Planted trees shall be able to survive the last two years of the minimum 5-year monitoring period without supplemental irrigation. CDFW recommends that cages be placed around planted trees if deer browse is a concern, and that weeding occur within and around caged trees until the trees become well-established. Once the trees become a sufficient size to withstand deer browse, the cages shall be removed.

Northern Spotted Owl

The Project is within the range of northern spotted owl (NSO), a CESA and federally listed as threatened species. NSO critical habitat occurs approximately 3 miles northwest of the Project and the closest CNDDB occurrence is approximately 2.4 miles west of the Project. The Project may cause adverse impacts to NSO, such as disturbance from elevated sound levels or human presence near nest sites. If NSO are nesting near the Project site during construction, the Project could result in take of the species and a substantial reduction in its population, which would be a mandatory finding of significant impact (CEQA Guidelines, § 15065). To reduce potential impacts to a level of less-than-significant, CDFW recommends the following Mitigation Measure:

- No Project activities within 0.25 miles of northern spotted owl nesting habitat shall occur from March 15 to August 31, unless northern spotted owl surveys have been completed by a Qualified Biologist following the USFWS *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls,* dated (revised) January 9, 2012 and accepted by CDFW in writing. If breeding northern spotted owls are detected during surveys, a quarter mile no-disturbance buffer zone shall be implemented around the nest. No Project activities shall occur within the buffer zone until the end of breeding season, or a Qualified Biologist determines that the nest is no longer active, unless otherwise approved in writing by CDFW. Alternate buffer zones may be proposed by a Qualified Biologist after conducting an auditory and visual disturbance analysis following the USFWS

guidance, *Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*, dated October 1, 2020. Alternate buffers must be approved in writing by CDFW. Survey results shall be provided to the Spotted Owl Observations Database (https://wildlife.ca.gov/Data/CNDDB/Spotted-Owl-Info). ***If NSO are detected, CDFW and the USFWS shall be immediately notified. If project activities may impact NSO, the Project shall apply for and obtain an ITP from CDFW, as well as authorization from the USFWS, before starting Project activities.***

Roosting Bats

The MND states that bats were observed roosting on a small wooden recess underneath the existing bridge structure and within the open beam structures. Additionally, many bats were observed night roosting under the bridge. The Project is within the range of three special-status bat species: pallid bat, Townsend's big-eared bat, and western red bat, all of which are SSC. Pallid bats use a variety of day roosts including rock outcrops, mines, caves, tree hollows, buildings, and bridges, whereas night roosts predominantly occur under bridges. Townsend's big eared bat primarily day roosts in mines and caves but have also been found in bridges and buildings. The species will night roost in more open settings, such as under bridges. Western red bats typically day roost in the foliage of trees and are found in riparian habitats (Erickson et al. 2002). Due to the presence of many night roosting bats under the bridge, the Project could significantly impact special-status bats, if present. To reduce potential impacts to special-status bats to a level of less-than-significant, CDFW recommends that Mitigation Measures BIO-29 through BIO-34 be replaced with the following measures:

- *Bat roost habitat, including bridges and structures, shall be surveyed for bats by a Qualified Bat Biologist at least 90 days prior to the beginning of Project-related activities, using a survey methodology reviewed and approved in writing by CDFW. If roosting bats are detected in bridges or structures or assumed to be present, an associated bat exclusion plan shall be submitted to CDFW, approved in writing by CDFW, and implemented. The plan shall recognize that both the maternity and winter roosting seasons are vulnerable times for bats and require exclusion outside of these times, generally between March 1 and April 15 or September 1 and October 15 when temperatures are sufficiently warm. Survey and exclusion plan implementation results shall be submitted to CDFW for written acceptance prior to Project construction activities. Removal of bridges or structures shall not start until the CDFW-approved Qualified Bat Biologist confirms that bats have left the site pursuant to the bat exclusion plan.*

- *To compensate for temporal loss of bat roosting habitat, prior to the start of Project construction, a minimum of three bat houses shall be installed within the Project area. Bat houses shall measure at least 20 inches wide and 25 inches tall with*

roosting crevices 0.75 to 1-inch in depth, and shall be mounted approximately 12 to 20 feet above ground with a southern or southeastern aspect. After installation, a Qualified Bat Biologist shall survey the bat houses once quarterly during construction and once annually thereafter to assess occupancy. Quarterly and annual roost reports shall be provided to CDFW until construction of the new bridge is completed.

- *Prior to any tree removal, a Qualified Bat Biologist shall conduct a habitat assessment for bats. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to tree removal and shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, or exfoliating bark for colonial species, and suitable canopy for foliage-roosting species). If suitable habitat trees are found, they shall be flagged or otherwise clearly marked, and shall be removed only during seasonal periods of bat activity (i.e., from approximately March 1 through April 15 (prior to the maternity season) or September 1 through October 15 (prior to winter torpor)). Bat habitat trees shall be removed using the following two-step removal process: On day 1, in the afternoon and under the supervision of a Qualified Bat Biologist, all tree limbs **not** containing suitable bat roosting habitat (e.g., cavities, crevices, deep bark fissures) shall be removed using chainsaws only. The next day, the rest of the tree shall be removed. If tree removal must occur outside of the above seasonal periods, a Qualified Bat Biologist shall submit a survey methodology to CDFW for review and written approval, and upon receiving CDFW's approval, shall conduct night emergence surveys or a complete examination of roost features to establish absence of roosting bats. If bats are discovered roosting in trees during the surveys, CDFW shall be consulted with prior to beginning tree removal; and tree removal shall not begin without CDFW's written permission.*

Additionally, CDFW recommends that Mitigation Measure BIO-35 be revised to include the following:

- To the greatest extent feasible, the new bridge shall be designed similarly to the existing bridge with respect to bat roosting habitat features. Bat roosting habitat features shall be species-specific and shall be reviewed and approved by a Qualified Bat Biologist prior to Project construction. The *Bat and Bridges Technical Bulletin (Hitch Hikers Guide to Bat Roosts), prepared by the California Department of Transportation (2003)* shall be referenced when designing the new bridge structure. The new bridge shall be monitored for bat roost presence quarterly for the first year after completion of the Project, and then annually for four years (i.e., total of 5 years of monitoring). If bat roosts are not discovered during the monitoring period, a Qualified Bat Biologist shall develop an alternative mitigation and monitoring plan to be reviewed and approved by CDFW; and then shall implement the plan.

Special-Status Plants

Mitigation Measures BIO-1 through BIO-4 require: 1) a qualified biologist to conduct special-status plant surveys within the construction area during the appropriate blooming period for species with potential to occur in the Project area; 2) protective fencing be installed around special-status plants to prevent impacts during the Project; 3) additional avoidance and minimization measures be implemented if special-status species cannot be avoided or if surveys cannot be conducted during the blooming period of special-status plants with potential to occur in the Project area; and 4) a qualified biologist to prepare a mitigation plan if special-status plants will be directly impacted by the Project. CDFW generally agrees with Mitigation Measures BIO-1, BIO-2, and BIO-4 but recommends the following revisions to reduce impacts to a level of less-than-significant:

- Special-status plant surveys shall be conducted by a Qualified Botanist during the blooming periods for all special-status plants with a potential to occur in the Project area using CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (see: https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants). The survey area shall encompass the Project area and adjacent habitat that may be indirectly impacted by the Project. More than one year of surveys may be necessary. Survey results must be accepted by CDFW in writing to ensure they were appropriately implemented.

- If special-status plant species are discovered during surveys and cannot be avoided during Project construction, a Qualified Botanist shall prepare a mitigation and monitoring plan for CDFW review and approval prior to starting Project construction and the Project shall not proceed until CDFW provides written approval. The plan may include on-site or off-site planting, permanent protection and management of suitable occupied habitat, or other similar measures to mitigate the loss of special-status plants.

Foothill Yellow-Legged Frog

The Project is within the range[1] of the Northwest/ North Coast clade of FYLF, an SSC, and CNDDB occurrences exist in Sage Creek, a tributary to Lake Hennessey, approximately 3.5 miles southeast of the Project site. 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 has 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 FYLF

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

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 FYLF 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. Therefore, Project impacts to FYLF would be potentially significant. To reduce impacts to less-than-significant, CDFW recommend the following mitigation measure be added to the MND:

> *A Qualified Biologist shall conduct a habitat suitability assessment in the vicinity of the Project to determine where FYLF 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, where appropriate. If suitable habitat is identified, the Qualified Biologist shall provide a FYLF survey methodology to CDFW for review and approval a minimum of two weeks prior to Project construction. No Project activities shall begin until FYLF 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 FYLF, with detections. If any FYLF are found, the Qualified Biologist shall prepare an avoidance, minimization, and relocation plan and submit it to CDFW for written acceptance, and then implement the plan.*

California Red-Legged Frog

A search of unprocessed data in the CNDDB shows an occurrence of CRLF from 2016 approximately 0.47 miles downstream of the Project. CRLF is a federal threatened species and an SSC. The CRLF discovered was a tadpole, indicating successful breeding in Chiles Creek. The occurrence of CRLF in Chiles Creek less than 0.5 miles from the Project site indicates a high potential for the species to occur at the Project site, and thus, without adequate avoidance and minimization measures, the Project could injure or kill California red-legged frogs if they occur on-site. Therefore, Project activities have the potential to significantly impact CRLF. To reduce impacts to less-than-significant, CDFW recommends that the following Mitigation Measure be added to the MND:

Prior to starting Project construction, a Qualified Biologist shall perform a habitat assessment and surveys in accordance USFWS's *2005 Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (see: https://www.fws.gov/sacramento/es/Survey-Protocols-Guidelines/Documents/crf_survey_guidance_aug2005.pdf). The results of the surveys shall be submitted to CDFW and USFWS for review and written acceptance prior to starting Project activities. If CRLF are discovered during surveys, a Qualified Biologist shall prepare an avoidance and minimization plan for CDFW review and approval, and implement any protection measures required by the USFWS during Project construction.*

Western Pond Turtle

The MND identifies a documented occurrence of WPT in Chiles Creek approximately 1-mile upstream of the Project site. WPT is an SSC and 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. WPT 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 WPT. Therefore, Project impacts to WPT would be potentially significant. To reduce impacts to less-than-significant, CDFW recommends the following Mitigation Measure:

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 preconstruction survey for the species within 48 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 Qualified 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.

In addition to the above mitigation measures for FYLF, CRLF, and WPT, CDFW requests that Mitigation Measure BIO-10 be revised to specify that a Wildlife Exclusion Fencing Plan shall be developed by a Qualified Biologist.

The above recommended mitigation measures would likely be required under the LSA Agreement for the Project, as applicable, if issued by CDFW.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs 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 CNDDB. The CNNDB online field survey form and other methods for submitting data can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & Game Code, § 711.4; Pub. Resources Code, § 21089). 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.

CDFW appreciates the opportunity to provide comments on the MND for the proposed Project and is available to meet with you to further discuss our concerns. If you have any questions, please contact Mr. Garrett Allen, Environmental Scientist, at Garrett.Allen@wildlife.ca.gov; or Ms. Melanie Day, Senior Environmental Scientist (Supervisory), at Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Stephanie Fong
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Stephanie Fong
Acting Regional Manager
Bay Delta Region

cc: State Clearinghouse # 2021090076

REFERENCES CITED

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