



State of California – Natural Resources Agency
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October 28, 2024

Brianne Harkousha
 City of Pacifica, Planning Department
 1800 Francisco Boulevard
 Pacifica, CA 94044
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Subject: 570 Crespi Drive Project, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2021120126, City of Pacifica, San Mateo County

Dear Brianne Harkousha:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of Pacifica (City) Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the 570 Crespi Drive Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during

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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construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86.) CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and 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 permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the lead agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports findings of overriding consideration for impacts that remain significant despite the implementation of all feasible mitigation. Findings of consideration under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, 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, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: Brendan Murphy

Objective: The objective of the Project is to purchase a parcel (APN 022-162-420, located at 540 Crespi Drive) from the City of Pacifica, and combine 0.7 acres of that parcel with the entirety of the 0.98-acre lot (APN 022-162-310), located at 570 Crespi Drive. This new 1.68-acre parcel would be developed with one two-story mixed-use building and two three-story residential buildings, including one commercial condominium and 19 residential condominiums, along with a new driveway and parking spaces.

Location: 570 Crespi Drive, Pacifica, San Mateo County, Crossroads: Anza Drive and Cabrillo Hwy, 37.597975, -122.499232.

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Timeframe: Approximately summer 2025 through early 2027.

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and 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 including, but not limited to, the below information.

- Land use changes resulting from, for example, rezoning certain areas.
- Footprints of permanent Project features and temporarily impacted areas, such as staging areas and access routes.
- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.
- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to:

Common Name	Scientific Name	Status
California red-legged frog (CRLF)	<i>Rana draytonii</i>	FT, SSC
Big free-tailed bat	<i>Nyctinomops macrotis</i>	SSC
Merlin	<i>Falco columbarius</i>	WL
Myrtle’s silverspot butterfly	<i>Speyeria zerene myrtleae</i>	FE, ICP
Obscure bumble bee	<i>Bombus calignosus</i>	ICP
San Francisco garter snake (SFGS)	<i>Thamnophis sirtalis tetrataenia</i>	FE, SE, SP
Steelhead – Central California Coast DPS	<i>Oncorhynchus mykiss irideus</i>	FT, SSC
Western bumble bee	<i>Bombus occidentalis</i>	CE, ICP
Franciscan thistle	<i>Cirsium andrewsii</i>	CRPR 1B.2

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Common Name	Scientific Name	Status
Kellogg’s horkelia	<i>Horkelia cuneata</i> var. <i>sericea</i>	CRPR 1B.1
Pappose tarplant	<i>Centromadia parryi</i> ssp. <i>Parryi</i>	CRPR 1B.2
Perennial goldfields	<i>Lasthenia californica</i> ssp. <i>Macrantha</i>	CRPR 1B.2
Robbin’s broomrape	<i>Aphyllon robbinsii</i>	CRPR 1B.1
Rose leptosiphon	<i>Leptosiphon rosaceus</i>	CRPR 1B.1
San Francisco spineflower	<i>Chorizanthe cuspidata</i> var. <i>cuspidata</i>	CRPR 1B.2
San Francisco collinsia	<i>Collinsia multicolor</i>	CRPR 1B.2
Scouler’s catchfly	<i>Silene scouleri</i> ssp. <i>scouleri</i>	CRPR 2B.2
Nesting birds		
Bats		
Rare plants		
Other aquatic and riparian species		
<p>Notes:</p> <p>FT = listed as threatened under the federal Endangered Species Act; FE = listed as endangered under the federal Endangered Species Act; ST = listed as threatened under CESA; SE = listed as endangered under CESA; SSC = state species of special concern; SP = state listed as fully protected; CE = state candidate endangered; CRPR = California Rare Plant Rank; WL = state watch list; ICP = California Terrestrial and Vernal Pool Invertebrate of Conservation Priority.</p>		

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service’s (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from “positive occurrence” databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the City adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends 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://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

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- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Changes in hydrological conditions that could alter the timing and magnitude of streamflow both during construction and operation of the Project;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.
- Water quality impacts resulting from construction and operation of the Project;
- Impacts both from construction and operation of the Project;
- Impacts to the bed, channel, and bank, in the reservoirs and creeks downstream of the Project; and
- Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat;

The CEQA document also should identify existing and 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 each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

Fully protected species, such as SFGS, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species;
- Live capture and relocation of a bird species for the protection of livestock; or

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- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish and G. Code §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an incidental take permit for unavoidable impacts to fully protected species if certain criteria are met (Fish & G. Code § 2081.15). Project proponents should consult with CDFW early in the project planning process.

COMMENTS AND RECOMMENDATIONS

Based on the information provided in the NOP of a draft EIR CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and/or indirect impacts on fish and wildlife (biological) resources. **These comments and recommendations are not an exhaustive list and CDFW may provide additional recommendations as more Project specific information is disclosed. The draft EIR must include a full Project Description, Environmental Setting, and Impact Analysis and Mitigation Measures as outlined above.** Editorial comments or other suggestions may also be included to improve the document.

COMMENT 1: San Francisco Garter Snake

Issue: The Project is located within one mile of areas where SFGS, a state and federally listed endangered species and state fully protected species, is known to occur (CNDDDB 2024, iNaturalist 2024). The Project is immediately adjacent to wetlands and associated uplands that may provide habitat for SFGS.

Evidence impact would be significant: SFGS are endemic snakes with a highly limited range in the San Francisco Peninsula. They are threatened by loss of habitat from agricultural, commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, CRLF (USFWS 2007, USFWS 2020). Project activities could impact upland habitat used for shelter, and vehicles or heavy equipment operated at the Project site could roll over basking SFGS, causing injury or mortality, and could result in a substantial reduction to SFGS populations.

Recommendation: CDFW recommends the draft EIR provide a detailed SFGS habitat assessment at and near the Project site, including identification of upland sites for basking; rodent burrows for shelter; and slow, flowing aquatic habitat, such as streams and low-lying marshes for feeding and reproduction. A qualified biologist should conduct the habitat assessment prior to initiating Project activities. A qualified biologist is an individual who holds a bachelor's degree from an accredited university and: 1) is knowledgeable in relevant species' life histories and ecology, 2) can correctly identify relevant species, 3) has conducted field surveys for relevant species, 4) is familiar with relevant survey protocols, and 5) is knowledgeable of state and federal laws regarding the protection of sensitive species.

If the habitat assessment described above identifies potentially suitable SFGS habitat at or near the Project site, the draft EIR should identify whether the habitat can be avoided and how take of SFGS will be avoided. The draft EIR should also incorporate avoidance measures in coordination with CDFW, as appropriate.

COMMENT 2: California Red-Legged Frog

Issue: The Project site is half a mile from areas where CRLF, a federally threatened and state special status species, is known to occur (CNDDDB 2024). The Project site is immediately adjacent to wetland habitat that could support populations of CRLF.

Evidence impact would be significant: CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated. CRLF

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primarily inhabit waterways including marshes, streams, and lagoons, and the species will also breed in ephemeral waters (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs (*Lithobates catesbeianus*) are the primary threats to CRLF (Thomson et al. 2016, USFWS 2017). Project land development could impact CRLF populations that may exist within the vicinity of the Project Site through loss of upland habitat used for feeding and shelter or through impacts to adjacent wetland habitat, including but not limited to pollutant or sediment runoff into wetlands as a result of Project activities.

Recommendation: To evaluate potential impacts to CRLF, CDFW recommends that a qualified wildlife biologist conduct a site assessment for CRLF in accordance with the USFWS “Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog” (USFWS 2005) to determine if CRLF are likely to be within or adjacent to the Project area. Results of the site assessment should be included in the draft EIR.

If the site assessment indicates that CRLF could occur at the Project site, then the draft EIR should require that a qualified biologist conduct pre-construction surveys prior to commencement of construction. If any CRLF are found during pre-construction surveys or at any time during construction, the qualified biologist should immediately inform CDFW and USFWS; consultation with USFWS is warranted to determine if the Project can avoid take. In addition, if CRLF could occur on site, then CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for CRLF.

COMMENT 3: Tree removal and bird impacts

Issue: The Project proposes to remove several large trees which, along with adjacent wetland habitat, may provide habitat for a variety of nesting birds. Additionally, the glass used for exterior building windows could result in bird collisions, which can cause bird injury and mortality.

Evidence impact would be significant: 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. Additionally, birds cannot typically see clear or reflective glass, and can collide with glass (e.g., windows) that reflect surrounding landscape and/or habitat features (Klem and Saenger 2013, Sheppard 2019). When birds collide with glass, they can be injured or killed. In the United States, the estimated annual bird mortality is between 365-988 million birds (Loss et al. 2014). The Project proposes to remove large trees and construct three residential buildings, which could impact birds nesting in trees or adjacent wetland habitat during construction as well as after Project completion.

Recommendation: If vegetation removal and other construction-related activities are scheduled during the nesting season, February 1 to September 1, CDFW recommends a focused survey for active nests be conducted by a qualified biologist within seven days prior to the beginning of Project-related activities. If an active nest is found, the qualified biologist should 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 should be specified to protect the bird’s normal behavior and prevent nesting failure or abandonment. No work should 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 seven days or longer occurs, another focused survey should occur before Project work is reinitiated.

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CDFW also recommends incorporating visual signals or cues to exterior windows to prevent bird collisions. Visual signals or cues include, but are not limited to, patterns to break up reflective areas, external window films and coverings, ultraviolet patterned glass, and screens. For best practices on how to reduce bird collisions with windows, please go to the USFWS's website for Buildings and Glass (<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/buildings-and-glass.php>).

COMMENT 4: Habitat connectivity

Issue: The Project site is currently undeveloped, supporting several large trees with herbaceous groundcover in the northern portion of the site, with gradual domination of wetland vegetation and a seasonal drainage area providing riparian habitat in the southern portion of the project site. The proposed Project would involve disturbance of existing on-site habitat through development of the site including removal of vegetation and construction of three buildings, which could impact connectivity between upper watershed habitat and the Pacific coast.

Evidence impact would be significant: Landscape connectivity is vital to conserving resilient wildlife populations, particularly those that have already been severely impacted by human development activities (Serieys et al. 2020). Preservation or restoration of patches of habitat is required to maintain connectivity, in conjunction with identification and mitigation of factors that limit movement, both within individual parcels and across landscapes. The Project site could offer a linkage to the Pacific coast or the nearby San Pedro Creek for migratory species, and development of the on-site habitat could result in significant adverse impacts to area-sensitive, barrier-sensitive, or less mobile migratory species (Spencer et al. 2010).

Recommendation: 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 draft EIR. Permanent loss of habitat caused by Project activities should be mitigated by establishing permanent preservation of the wetlands area of the Project site through a conservation easement and provision of an endowment for long-term management. Alternately, the project proponent could mitigate permanent impacts from the Project through purchasing mitigation or conservation bank credits, if bank credits are available for the area. CDFW recommends consulting with CDFW scientists to determine appropriate mitigation for the draft EIR.

COMMENT 5: Special-status plants

Issue: The Project site contains wetland and upland habitat that may be suitable for special-status plants. The Project has the potential to crush and kill special-status plants during ground-disturbing activities, permanently remove habitat, and permanently alter the hydrology of the site by increasing impermeable surfaces and redirecting storm water. Without floristic botanical surveys, the Project would not accurately identify special-status plant occurrences and could impact them.

Recommendation: To reduce potential impacts to special-status plants to less-than-significant, CDFW recommends the following mitigation measure.

Mitigation Measure BIO-1: Special-status Plant Survey and Avoidance: A qualified botanist shall conduct surveys during the appropriate blooming period for all special-status plants that have the potential to occur on or adjacent to the Project area prior to the start of ground-disturbing activities and prepare a report documenting survey findings, to be incorporated into the EIR. Habitat adjacent to the Project area should be surveyed if the Project may have indirect impacts off-site as a result of changes to hydrological conditions or other indirect impacts. More than one year of surveys may be necessary. Surveys and reporting shall be conducted following *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive*

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Natural Communities. Surveys shall be submitted to CDFW for review and written acceptance. 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 the Project, the Project shall provide mitigation including onsite restoration and a restoration plan approved by CDFW, off-site habitat preservation at a 3:1 mitigation to impact ratio based on acreage or number of plants, as appropriate, or another method accepted in writing by CDFW. The qualified botanist shall be knowledgeable about plant taxonomy, familiar with plants of the region, and have experience conducting botanical field surveys according to vetted protocols.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES


CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document 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 environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a draft EIR in order to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Shannon Husband, Environmental Scientist, at (707) 337-1364 or Shannon.Husband@Wildlife.ca.gov; or Wes Stokes, Senior Environmental Scientist (Supervisory) at (707) 339-6066 or Wesley.Stokes@Wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2021120126)
City of Pacifica, PlanningDivision@pacificagov

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