

March 21 2023

Haggerty, Nicole@Wildlife

STATE CLEARING HOUSE

From: Hosea, Robert@Wildlife
Sent: Friday, March 10, 2023 1:57 PM
To: mthomas@countyofglenn.net
Cc: Boyd, Ian@Wildlife; Wildlife R2 CEQA; Sheya, Tanya@Wildlife; Thomas, Kevin@Wildlife
Subject: CDFW comments on Draft EIR-Glenn County General Plan Update-SCH#-2022100620

Mr. Thomas-

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the County of Glenn General Plan Update (SCH# 2022100620) and provide comments and recommendations regarding those activities covered in the DEIR that may affect California fish, wildlife, plants, and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the DEIR that the California Department of Fish and Wildlife (CDFW), by law, may need to exercise its own regulatory authority under the Fish and Game Code.

CDFW has reviewed the DEIR and wishes to reiterate those comments provided in a letter dated November 22, 2022 to the County of Glenn at the time of the publication of the Notice of Preparation, located in Appendix A of the DEIR. CDFW recognizes that projects that may be initiated within the County as covered under the proposed General Plan Update, will individually be subject to CEQA review and permitting when applicable.

In addition, CDFW has noted the following errors in Table 3.4-3 of the DEIR which could compromise analyses based on that incorrect information:

- 1) The scientific name of at least two species identified in Table 3.4-3 appears to be incorrect or incomplete (Humboldt marten and Bank Swallow) and should be corrected to (*Martes caurina humboldtensis*) (*Riparia riparia*), respectively, as this could lead to legal challenges to any protections of these species or impacts analyses provided through the final EIR.
- 2) The current status of at least two species: Crotch's bumblebee and Tricolored Blackbird is incorrectly identified. Tricolored Blackbirds are currently listed as Threatened under the California Endangered Species Act (CESA) and Crotch's bumblebee is currently a candidate for Threatened status. As such, both of these species are provided specific protections under CESA.

CDFW requests that the County of Glenn thoroughly review the scientific names and current listing status, under CESA and the federal Endangered Species Act (FESA), for all plant and animal species identified in Tables 3.4-2 and 3.4-3 and re-analyze any potential impacts the proposed General Plan update may have on any and all special-status species and their habitats, particularly in light of the changes to legal protections provided by listing under CESA and FESA.

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests notification of proposed actions and pending decisions regarding the DEIR for the General Plan Update. Please direct written notifications to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670. Email notifications should be directed to CDFW at r2ceqa@wildlife.ca.gov. Email notifications are preferred.

CDFW appreciates the opportunity to comment on the DEIR for the County of Glenn General Plan Update and recommends that the Glenn County Dept. of Planning and Community Development Services address CDFW's comments and concerns. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

Please reply and verify that you received this email containing CDFW's comments on the DEIR and were able open it.

If you have any questions regarding the comments provided in this email, or wish to schedule a meeting and/or site visit, please contact me at (530) 708-1199 or by e-mail: robert.hosea@wildlife.ca.gov.

Robert Hosea
Environmental Scientist
Habitat Conservation Program
North Central Region
California Department of Fish and Wildlife