



State of California – Natural Resources Agency
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September 5, 2024

Thanh Nguyen, Senior Civil Engineer
City of Los Altos
1 N San Antonio Road
Los Altos, CA 94022
TNguyen@losaltos.gov

Subject: Adobe Creek Sewer Main Replacement Project, Mitigated Negative Declaration, SCH No. 2024080361, Santa Clara County

Dear Thanh Nguyen:

The California Department of Fish and Wildlife (CDFW) received a Mitigated Negative Declaration (MND) from the City of Los Altos (Lead Agency) for the Adobe Creek Sewer Main Replacement 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 California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

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.) Similarly, 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

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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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 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. FOC under CEQA, however, does 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 rivers, 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

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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.

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 (MBTA).

Fully Protected Species

Several Fully Protected Species (Fish & G. Code § 3511 and 4700) have the potential to occur within or adjacent to the Project area.

Project activities described in the MND should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. Fully protected species 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
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15).

CDFW also recommends the MND analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species. Project proponents should consult with CDFW early in the Project planning process.

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PROJECT DESCRIPTION SUMMARY

Proponent: City of Los Altos

Objective: The City is proposing to replace the existing Adobe Creek Sewer Main which includes 53 sewer lines, totaling 6,580 linear feet. Construction would include approximately 5,810 linear feet of trenchless construction and 860 linear feet of open cut excavation. The Project site is located largely within private properties, the City's public right-of-way, and various parks. The existing sewer mains are due for replacement because of their current condition. The purpose of the proposed project would increase resiliency and longevity of the sewer main and would greatly reduce maintenance needs associated with sewer line repair.

Location: Includes Redwood Grove Nature Preserve, Shoup Park, and private parcels in the City of Los Altos, Santa Clara County.

Timeframe: Not noted.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

I. Environmental Setting and Related Impact Shortcoming

Would the Project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?

COMMENT 1: Nesting Birds

The Project would impact 33 trees. The Project has the potential to disturb special-status species and nesting habitat for birds and raptors. Impacts could occur through direct damage or mortality to birds and nests as well as potential electrocution. Take of nesting birds, birds in the orders Falconiformes or Strigiformes, and migratory nongame bird as designated in the MBTA is a violation of Fish and Game Code (§ 3503, 3503.5, 3513).

Recommended Mitigation Measure 1: Nesting Bird Surveys

Revise existing Mitigation Measure BIO-3 to the following. If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird

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species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist experienced with the applicable species and habitat shall conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys shall be conducted at the appropriate times of day and during appropriate nesting times.

Recommended Mitigation Measure 2: Active Nest Buffers

If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

COMMENT 2: Bats

The Project would impact 33 trees. A number of bats have the potential to occur in or adjacent to the Project area, including, but not limited to Townsend's big-eared bat and Pallid bat. Townsend's big-eared bats and pallid bats are protected by CDFW as California Species of Special Concern (SSC).

Construction activities may result in the disturbance of hibernation or maternal roost sites, which may result in the harm, death, displacement of individual bats and/or the disruption of reproductive success of nursery colony roosts. Proposed activities may result in the disturbance and/or loss of hibernation or maternal roost sites, which may result in the harm, death, displacement of individual bats and/or the disruption of reproductive success of nursery colony roosts.

Bats are considered non-game mammals and are protected by state law from take and/or harassment (Fish and Game Code §4150, CCR §251.1). In order to determine the extent to which impacts may occur to bats and determine where habitat loss may

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occur from the removal of trees, the MND should propose measures to conduct a bat habitat assessment of suitable bat roosting habitat.

Recommended Mitigation Measure 3: Habitat Assessment and Monitoring

The habitat assessment shall include a visual inspection of features within the work area for potential roosting features including trees, crevices, portholes, expansion joints and hollow areas (bats need not be present). include a visual inspection of features within 200 feet of the work area for potential roosting features including trees, crevices, portholes, expansion joints and hollow areas (bats need not be present). The MND should also include a section that discusses the results of the suitable habitat assessment and if any bats or signs of bats (feces or staining at entry/exit points) are discovered. The surveys should occur at least two seasons in advance of Project initiation. The MND should include:

- Bat Habitat Monitoring by a qualified biologist of suitable habitat from March 1 to April 1 or August 31 to October 15 prior to construction activities. If the focused survey reveals the presence of roosting bats, then the appropriate exclusionary or avoidance measures will be implemented prior to construction during the period between March 1 to April 15 or August 31 to October 15.
- Bat Project Avoidance: If active bat roosts are observed during environmental assessments or during construction, at any time, all Project activities should stop until the qualified biologist develops a bat avoidance plan to be implemented at the Project site. The bat avoidance plan should utilize seasonal avoidance, phased construction as well as temporary and permanent bat housing structures developed in coordination with CDFW.

COMMENT 3: Western Pond Turtle

Western pond turtle (*Emys marmorata*) have the potential to occur in the Project site. Western pond turtle are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported.

A total of 860 linear feet of the sewer alignment would be excavated with a depth of 10-feet to create open trenches for a total area of disturbance of 2,580 square feet. Creating access roads, trenches, fencing, and use and staging of heavy equipment may directly lead to mortality of adults and young, and eggs and/or indirectly affect through increased sediment movement or through entrapment in trenches and uncovered holes.

Without appropriate avoidance and minimization measures for western pond turtle, potentially significant impacts associated with Project activities could include nest

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reduction, inadvertent entrapment, reduced reproductive success, reduction in health or vigor of eggs and/or young, and direct mortality.

Recommended Mitigation Measure 4: Western Pond Turtle Surveys

CDFW recommends a qualified biologist conduct focused surveys for western pond turtle 10 days prior to Project implementation using a best available methodology for the intended purpose CDFW maintains a list of recommended survey protocols for western pond turtle and other fish and wildlife species online at:

<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281283-reptiles>.

Recommended Mitigation Measure 5: Western Pond Turtle Relocation

CDFW recommends that if any western pond turtle are discovered at the site immediately prior to or during Project activities, they should be allowed to move out of the area on their own. If a western pond turtle is unable to move out of the Project area on its own, a qualified biologist shall relocate western pond turtle out of the Project area into habitat similar to where it was found.

COMMENT 4: Special Status Amphibians

A total of 860 linear feet of the sewer alignment would be excavated with a depth of 10-feet to create open trenches for a total area of disturbance of 2,580 square feet. Creating access roads, trenches, fencing, and use and staging of heavy equipment may directly lead to mortality of adults and young, and eggs and/or indirectly affect through increased sediment movement or through entrapment in trenches and uncovered holes. The Project may impact the following special-status herpetofauna, which the MND identified have potential to occur: California giant salamander (*Dicamptodon ensatus*, SSC), Santa Cruz black salamander (*Aneides niger*, SSC), and California red-legged frog (*Rana draytonii*, federally threatened, state SSC).

The Project would impact streams and surrounding habitat that may be occupied by these species. California red-legged frogs can use upland habitat one to two miles away from breeding ponds, including 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 2017).

Recommended Mitigation Measure 6: Habitat Surveys

For all Project activities that occur within 500 feet of stream or wetland habitat, prior to ground-disturbing activities, a qualified biologist should conduct a preconstruction survey within 48 hours prior to the start of Project activities, focusing on the presence of California giant salamander, Santa Cruz black salamander, and California red-legged frog. If any of these special-status species are discovered during the survey, Project

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activities should not begin until CDFW has been consulted and approved in writing measures to avoid and minimize impacts to special-status species, and the measures have been implemented. If California red-legged frog is encountered, the Project should consult with USFWS pursuant to the federal Endangered Species Act (ESA) and obtain any required authorization for impacts. If an LSA Notification is submitted for Project activities affecting streams, CDFW may include in the LSA Agreement, if issued, additional protection measures for special status herpetofauna pending further analysis of the potential for their occurrence within the Project area.

Recommended Mitigation Measure 7: Exclusionary Fencing and Devices

The MND should include measures to prevent entrapment of herpetofauna during construction. Steep-walled excavations (e.g., trenches) that may act as pitfall traps should be inspected for wildlife at least once per day, immediately before backfilling, and during or immediately after a rain event. In lieu of daily inspections (weekends, etc.), exclusionary fencing, covers, ramps, or similar measures should be taken to prevent wildlife entrapment. Open pipe segments should be capped or sealed with tape (or equivalent material) nightly, or otherwise stored at least two feet above ground. Should a pipe segment become occupied by wildlife, the animal will be allowed to vacate the pipe on its own or will be removed and relocated in accordance with best practices and in consultation with CDFW or USFWS, as needed. All construction and sediment control fencing should be inspected each workday during construction activities to ensure they are functioning properly, and not trapping, risking impediment of movement, or risking predation or desiccation of wildlife. The Project should prohibit use of erosion control materials potentially harmful to wildlife, such as monofilament netting (erosion control matting) or similar material.

COMMENT 5: Crotch's bumble bee

Crotch's bumble bee (*Bombus crotchii*) are candidate species under CESA (CEQA Guidelines, §15380, subds. (c)(1)). The NOP does not address whether the proposed Project could result in impacts to Crotch's bumble bee. Crotch's bumble bee occurrences have been documented within the vicinity of the Project area and historic observations occur elsewhere in Santa Clara County (CDFW 2024, County). The Project location is within the Crotch's bumble bee range (<https://wildlife.ca.gov/Conservation/CESA>) and grassland within and adjacent to the Project area may contain potential habitat for Crotch's bumble bee.

The Project includes ground disturbance that may occur within ruderal grass and herbaceous vegetation and that may be potential Crotch's bumble bee nesting and foraging habitat. Potential impacts include direct mortality through crushing or filling of active bee colonies and hibernating bee cavities, reduced reproductive success, loss of

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suitable breeding and foraging habitats, loss of native vegetation that may support essential foraging habitat.

Recommended Mitigation Measure 8: Habitat Assessment

A habitat assessment shall be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch's bumble bee. The habitat assessment shall include all suitable nesting, overwintering, and foraging habitats within the Project area and surrounding areas. Potential nest habitat (February through October) could include that of other *Bombus* species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other *Bombus* species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment shall be conducted during peak bloom period for floral resources on which Crotch's bumble bee feed. Further guidance on habitat surveys can be found within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (<https://wildlife.ca.gov/Conservation/CESA>).

Recommended Mitigation Measure 9: Survey Plan

If Crotch's bumble bee habitat is present within the Project area, the Project should include a pre-construction survey plan as a mitigation measure. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch's bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW.

Surveys should be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that Project work activities will occur. Further guidance on presence surveys can be found within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (<https://wildlife.ca.gov/Conservation/CESA>).

Recommended Mitigation Measure 10: Crotch's Bumble Bee Avoidance or Take Authorization

If Crotch's bumble bee are detected during pre-construction surveys, a Crotch's bumble bee avoidance plan should be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal.

If full take avoidance is not feasible, CDFW strongly recommends that the MND state that the Project proponent will apply to CDFW for take authorization under an ITP.

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Recommended Mitigation Measure 11: Herbicide Application: To minimize impacts to bumble bees, avoid the bloom periods for herbicide application and mowing activities. If this is not possible, CDFW recommends that the Project obtain take authorization under an ITP, pursuant to Fish and Game Code section 2081 subdivision (b).

Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

COMMENT 6: Permits for Stream, Wetland, and Other Waters Impacts, Impacts to Sensitive Natural Communities, Riparian Habitat, Wetlands, LSA Notification and Clean Water Act compliance

The Project may be subject to the Clean Water Act and the Porter-Cologne Water Quality Control Act, but not Fish and Game Code section 1600 et seq. Development facilitated by the Project may result in impacts to streams and riparian habitats, such as Adobe Creek. Approximately 0.82-acre (3,319 linear feet) of intermittent stream and 6.45 acres of mixed riparian woodland occur within the Project site.

When riparian habitat is substantially altered, riparian functions become impaired, thereby likely substantially adversely impacting aquatic and terrestrial species. Without specific mitigation measures containing performance standards CDFW considers impacts to these resources as potentially significant (CEQA Guidelines, §§ 15065, 15380).

To reduce potential impacts to streams, wetlands, and other waters to less-than-significant and comply with Fish and Game Code section 1600 et seq., the Porter-Cologne Water Quality Control Act, and the Clean Water Act, CDFW recommends including the mitigation measure below in the MND.

Recommended Mitigation Measure 12: Stream and Wetland Mitigation and Resource Agency Permits

The Project shall be designed to minimize fill of jurisdictional waters. If impacts to any streams cannot be avoided, then prior to the impacts the Project shall submit an LSA notification to CDFW and comply with the LSA Agreement, if issued. Additionally, if impacts to any streams, wetlands, or other waters cannot be avoided, the Project shall obtain authorization from the Regional Water Quality Control Board (RWQCB) and U.S. Army Corps of Engineers (USACE) pursuant to the Porter-Cologne Water Quality Control Act and Clean Water Act sections 401 and 404, as applicable. Impacts to waters, wetlands, and riparian habitat subject to the permitting authority of CDFW, the

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RWQCB, or the USACE shall be mitigated by providing restoration at a minimum 3:1 restoration to impact ratio in area for permanent impacts and 1:1 ratio for temporary impacts, unless otherwise approved in writing by CDFW or otherwise required by the RWQCB or USACE. A Habitat Mitigation and Monitoring Plan shall be prepared and implemented for the proposed mitigation. The Project shall obtain written approval of this plan from CDFW, the RWQCB, or the USACE as applicable prior to any disturbance of stream or riparian habitat, wetlands, or other waters.

Recommended Mitigation Measure 13: LSA Notification and other Resource Agency Permits

The Project shall notify CDFW pursuant to Fish and Game Code section 1600 et seq. using the Environmental Permit Information Management System (see: <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>) for Project activities affecting lakes or streams, associated riparian or otherwise hydrologically connected habitat, and any connected wetlands, and shall comply with the LSA Agreement, if issued. Projects shall also obtain and comply with applicable permits from the RWQCB and USACE pursuant to the Clean Water Act and Porter-Cologne Water Quality Control Act.

Recommended Mitigation Measure 14: Habitat Restoration and Compensation

The Project shall implement restoration on-site or off-site to mitigate temporary or permanent impacts to sensitive natural communities, riparian habitat, and wetlands at a minimum 1:1 (restore on-site temporary impacts) or 3:1 (permanent impacts) mitigation to impact ratio for acres and linear feet of impacts, or habitat compensation including permanent protection of habitat at the same ratio through a conservation easement and preparing and funding implementation of a long-term management plan, unless otherwise approved in writing by CDFW.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base 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 California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

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ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would 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. (See 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 to assist the Lead Agency in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Marcus Griswold, Senior Environmental Scientist (Specialist), at (707) 815-6451 or Marcus.Griswold@wildlife.ca.gov; Jason Faridi, Senior Environmental Scientist (Supervisory), at Jason.Faridi@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species and Commercially/Recreationally Important Species

ec: Office of Planning and Research, State Clearinghouse, Sacramento
Craig Weightman, CDFW Bay Delta Region – Craig.Weightman@wildlife.ca.gov

REFERENCES

California Department of Fish and Wildlife (CDFW). 2024. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed April 25, 2024.

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ATTACHMENT 1: Special-Status Species

Species	Status
Fish and Invertebrates	
Crotch's bumble bee (<i>Bombus crotchii</i>)	State candidate (SC)
Birds	
Cooper's hawk (<i>Accipiter cooperii</i>)	State Watch List
white-tailed kite (<i>Elanus leucurus</i>)	State Fully Protected (FP)
Mammals	
badger (<i>Taxidea taxus</i>)	Species of Special Concern (SSC)
pallid bat (<i>Antrozous pallidus</i>)	SSC
San Francisco dusky-footed woodrat (<i>Neotoma fuscipes annectens</i>)	SSC
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	SSC
Reptiles and Amphibians	
California giant salamander (<i>Dicamptodon ensatus</i>)	SSC
California red-legged frog (<i>Rana draytonii</i>)	Federally Threatened (FT), SSC
Santa Cruz black salamander (<i>Aneides niger</i>)	SSC
western pond turtle (<i>Emys marmorata</i>)	Proposed FT, SSC