



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



September 27, 2024

Katherine Schaefers
Planning Manager
City of Ukiah - Community Development Department
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SUBJECT: GREAT REDWOOD TRAIL - UKIAH (PHASE 4), MITIGATED NEGATIVE DECLARATION, STATE CLEARINGHOUSE NUMBER: 2024081302

Dear Katherine Schaefers:

The California Department of Fish and Wildlife (CDFW) received a notice of a draft Initial Study and Mitigated Negative Declaration (MND) for the City of Ukiah's Phase 4 Great Redwood Trail Project (Project) on August 29, 2024.

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 may need to exercise regulatory authority as provided by the Fish and Game Code. For example, the Project is subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.) and a Lake or Streambed Alteration Agreement has been issued. Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the

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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.

PROJECT DESCRIPTION SUMMARY

The City of Ukiah (City) proposes to construct a 1.9-mile segment of the Great Redwood Trail (GRT) within the City that would connect the existing southern terminus of the GRT at Commerce Drive south, to the City's existing facilities at Plant Road. Project implementation will include construction of a 10-foot-wide paved trail with a 2-foot-wide gravel shoulder on either side of the trail. The Project will include pedestrian access points, a new trailhead, two new pedestrian and bike bridges, and three culvert extensions at existing water crossings. Construction will include earthmoving equipment including graders, bulldozers, excavators, cranes and trucks to remove excavated soil and supply asphalt and concrete.

Location:

The Project is located within the City of Ukiah and unincorporated areas of Mendocino County along an inactive 1.9-mile segment of railroad corridor between Commerce Drive to the north, and Plant Road to the south.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City 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

The draft MND does not include an analysis of potential impacts to listed species, Species of Special Concern, rare plants, riparian habitat or other Sensitive Natural Communities. The Project's identification and analysis of potential impacts to these resources was informed by an Aquatic Resources and Wetland Delineation Report. This report did not include floristic survey results, and the survey documented was conducted outside the blooming period for most plant species with the potential to occur. Within a half mile of the Project, the California Natural Diversity Database (CNDDDB) documents occurrences of Baker's Meadowfoam (*Limnanthes bakeri*), a State-listed species with a California Plant Rank of 2.B1.

CDFW Recommendation 1: Adequate biological surveys should be conducted at the appropriate time of year to determine whether rare plants, Sensitive Natural Communities, and Species of Special Concern or their habitat are present.

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CDFW Recommendation 2: If Baker's meadowfoam or other listed species or associated habitat is identified within the Project area, and potential impacts to these species are unavoidable, consult with CDFW to seek the appropriate take authorization for species listed under the Native Plant Protection Act (Fish & G. Code, § 1904) or the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.).

II. Mitigation Measure or Alternative and Related Impact Shortcoming

Issue 1:

The Project proposes to remove "trees and other natural vegetative features" (page 24) along the trail alignment, but the species or their natural communities are not identified. The Project proposes revegetation and restoration activities, which include natural regeneration along the trail alignment and planting trees and shrubs within riparian zones to enhance water quality and habitat (page 27).

CDFW Recommendation 3: Revise Mitigation Measure BIO-2 and BIO-4 to require Project revegetation and enhancement plans identify the species and natural community proposed for removal, and propose a planting palette comprised of the appropriate native tree and shrub species that are suitable for that natural community.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the 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>.

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. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

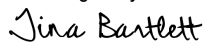
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CONCLUSION

CDFW appreciates the opportunity to comment on the draft MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jennifer Garrison, Senior Environmental Scientist (Specialist) at (707) 477-7792 or Jennifer.Garrison@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Tina Bartlett, Regional Manager
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ec: State Clearinghouse
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Rebecca Garwood, Angela Liebenberg, Jennifer Garrison
California Department of Fish and Wildlife

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REFERENCES

California Department of Fish and Wildlife. California Natural Diversity Database. September 13, 2024.

California Department of Fish and Wildlife. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. March 20, 2018.

City of Ukiah. CEQA Initial Study for: Great Redwood Trail – Ukiah (Phase 4) Mitigated Negative Declaration. August 29, 2024

Jane Valerius Environmental Consulting. Aquatic Resources Report/Wetland Delineation of Waters of the United States for the Ukiah Great Redwood Trail Phase 4 Project. March 3, 2022.