



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

2825 Cordelia Road, Suite 100

Fairfield, CA 94534

(707) 428-2002

www.wildlife.ca.gov

GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Director



December 23, 2024

Adrian Veliz, Senior Planner

Contra Costa County Department of Conservation and Development

30 Muir Road

Martinez, CA 94553

Adrian.Veliz@dcd.cccounty.us

Subject: Camino Pablo Single-Family Residential Subdivision, Rezone, General Plan Amendment, and Development Plan, Initial Study/Mitigated Negative Declaration, SCH No. 2024110934, Contra Costa County

Dear Mr. Veliz:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) from Contra Costa County for the Camino Pablo Single-Family Residential Subdivision, Rezone, General Plan Amendment, and Development Plan (Project) pursuant 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

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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need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority (Fish & G. Code, § 1600 et seq.). 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 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

Proponent: Benoit McVeigh

Objective: The objective of the Project is to develop 7.9 acres of a 23.9-acre property into a residential subdivision consisting of 13 single-family homes with attached accessory dwelling units incorporated into 11 of the residences. The remaining 16.0 acres will remain as open space. Primary Project activities include on-site grading; construction of residences; installation of stormwater bioretention basins and an on-site storm drain system which will discharge to an existing storm drain system; construction of a new access road; and widening of two existing roadways.

Location: The Project site is located in the Town of Moraga, CA in Contra Costa County, immediately east of the Tharp Avenue and Camino Pablo intersection. The Project coordinates are Latitude [37.813056], Longitude [-122.115556].

Timeframe: The applicant expects Project construction to span a total of 32 months, including 14 months for grading, infrastructure installation, and building pads, and 18 months for homes construction.

REGULATORY AUTHORITY

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.

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CESA-listed species identified that may occur within the Project area include, but are not limited to, Alameda whipsnake (*Masticophis lateralis euryxanthus*).

Candidate species for listing under CESA are afforded the same legal protections as CESA-listed species while under review (Fish and Game Code § 2608). Candidate species which may occur within the Project area include western bumble bee (*Bombus occidentalis*) and burrowing owl (*Athene cunicularia*).

Plants identified as rare or endangered by the California Fish and Game Commission identified that may occur within the Project area include, but are not limited to, the following species ranked as 1B.2 by the California Native Plant Society: bent-flowered fiddleneck (*Amsinkia lunaris*), Mt. Diablo fairy-lantern (*Calochortus pulchellus*), and Diablo helianthella (*Helianthella castanea*).

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 (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Fully Protected Species

Fully protected species, such as golden eagle (*Aquila chrysaetos*) and white-tailed kite (*Elanus leucurus*), 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). Project proponents should consult with CDFW early in the Project planning process.

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Raptors and Other Nesting Birds

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).

Lake and Streambed Alteration Agreement

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 horizontal 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 IS/MND and complied with its responsibilities as a responsible agency under CEQA.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Contra Costa County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the Project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends, CDFW concludes that a Mitigated Negative Declaration is appropriate for the Project.

I. Mitigation Measure or Alternative and Related Impact Shortcoming

COMMENT 1: Wildfire Abatement Requirements and Associated Impacts

Issue: The IS/MND does not account for local wildfire abatement and defensible space requirements in its analysis of potential Project impacts upon biological

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resources. The Project site is located in the Town of Moraga, and the IS/MND identifies the subject property as occurring in a Very High Fire Hazard Severity Zone in a State Responsibility Area (page 90). In the Public Services section on page 75, the IS/MND indicates that fire protection within the Project vicinity will be provided by the Moraga-Orinda Fire District (MOFD). MOFD requires all property owners to maintain a defensible space from wildfire as part of their Exterior Wildfire Hazard Abatement Requirements. Without an evaluation of Project impacts in the context of defensible space from wildfires, the Project will have reasonably foreseeable undisclosed and unanalyzed potentially significant impacts to the environment.

The IS/MND identifies two ephemeral drainages and two potential seasonal wetlands within the subject property. The IS/MND does not specify the distance between these features and the development area, though one of the ephemeral drainages is mapped near the northern boundary of the development on the Site Plan (Figure PD-1). In addition to the two ephemeral drainages and two seasonal wetlands, King Canyon Creek is located 0.07 miles east of the southern portion of the property. Parcels planned for residential development are located on the southern end of the property.

As of March 2024, MOFD Exterior Wildfire Hazard Abatement Requirements include removing all dead or dying trees, removing or cutting of grasses and weeds to a height of 3 inches or less, creating a vertical spacing of 6 feet between branches and foliage or ground, and removing all non-irrigated brush within the area 30-100 feet from any structure or attached deck (Zone 2). On page 39, the IS/MND concludes that there will be less-than-significant impacts upon state or federally protected wetlands because construction work will not occur within 50 feet of such features. Depending upon the distance from each planned residence to seasonal wetlands, ephemeral drainages, or from King Canyon Creek and associated riparian resources, compliance with wildfire abatement requirements may result in modification or removal of these habitats. Such impacts must be evaluated as part of the Lead Agency's CEQA review.

Recommendation: CEQA Guidelines require the Lead Agency to consider direct physical changes in the environment which may be caused by the Project and reasonably foreseeable indirect physical changes during its evaluation (CEQA Guidelines § 15064, subd. (d)). Given Project objectives and location, it is reasonably foreseeable that defensible space requirements will result in physical changes to the environment over the life of the Project. These impacts were not assessed in the IS/MND, and without this consideration, it cannot be concluded that Project impacts to riparian habitat and/or wetlands will be less-than-significant. CDFW recommends that the IS/MND be revised and recirculated to disclose the distance between defensible space boundaries and riparian habitat or ephemeral drainages and evaluate all potential Project-related impacts to these habitats,

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including those resulting from wildfire abatement and defensible space maintenance. If Project activities have the potential to significantly adversely impact riparian habitat or ephemeral drainages, CDFW recommends a defensible space setback from these features be incorporated into Project design plans to reduce impacts to less-than-significant levels in the revised and recirculated IS/MND.

COMMENT 2: Mitigation for Impacts to Special-Status Species

Alameda Whipsnake; Section 4, Page 34

Issue: Mitigation measure Biological Resources 3 is insufficient to reduce Project impacts to Alameda whipsnake to less-than-significant levels. Biological Resources 3 states that mitigation will be proposed and an ITP will be obtained if Alameda whipsnake are detected during a preconstruction survey. There are currently no systemic protocol-level surveys that have been adopted by CDFW or developed by an independent science panel to demonstrate the presence or absence of Alameda whipsnake within a Project site, and a lack of detection during preconstruction surveys is insufficient evidence to conclude Alameda whipsnake are absent from the habitats within the Project site.

The IS/MND concludes that Alameda whipsnake have potential to utilize the Project site in a dispersal capacity. Alameda whipsnake are fast-moving daytime hunters (U.S. Fish and Wildlife Service [USFWS], 2011) and are therefore most likely to be active during the time of day when construction activities will occur. Alameda whipsnake is listed as threatened under the CESA, and as such, any “take” is prohibited without an ITP. Project activities such as clearing or grading during construction may result in direct take of Alameda whipsnake through inadvertent crushing of snakes moving through the Project site or entrapment of snakes in construction materials. Development of the Project site will result in permanent loss of habitat for Alameda whipsnake and may contribute to habitat loss and fragmentation, resulting in indirect take, over the life of the Project.

Recommendation 1: Due to the potential for Alameda whipsnake to occur within the Project site and the potential for the Project to result in take of Alameda whipsnake pursuant to Fish and Game Code section 86, CDFW recommends that an ITP be obtained for the Project.

Recommendation 2: To ensure significant impacts are mitigated to a level of less-than-significant, CDFW recommends the feasible mitigation measure described below be incorporated as an enforceable condition into the final CEQA document for the Project:

Alameda Whipsnake Mitigation. CDFW recommends that known Alameda whipsnake habitat types, including annual grassland, oak savanna, oak-bay

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woodland, mixed evergreen forest, riparian, and areas with rock outcrop features, should be mapped on the Project site and Project impacts such as permanent destruction or fragmentation of habitat, including through the ongoing maintenance of a defensible space from wildfire, and ongoing impacts from roadways be identified and evaluated in a revised and recirculated IS/MND. CDFW recommends that the IS/MND require enforceable mitigation for these impacts to Alameda whipsnake and their habitats to a less-than-significant level by requiring compensatory mitigation in the form of conserved lands for permanent impacts resulting from housing development and roadways, as well as for temporary impacts. Conserved lands should be protected in perpetuity under a legal instrument such as a conservation easement, be required to be managed in perpetuity through an endowment with an appointed land manager and be required to have a land trust named on the legal instrument as a beneficiary. CDFW recommends that priority for conserved lands be given to on-site locations for this Project. The IS/MND should also be revised to address cumulative impacts to the Alameda whipsnake from fragmentation of habitat, permanent loss of habitat and impacts from vehicle traffic on roadways.

Recommendation 3: CDFW also recommends the following avoidance and minimization measures be included in a revised IS/MND:

Open Trenches: Any open trenches, pits, or holes with a depth larger than one-foot shall be covered at the conclusion of work each day with a hard, non-heat conductive material (i.e. plywood). No netting, canvas, or material capable of trapping or ensnaring wildlife shall be used to cover open trenches. If use of a hard cover is not feasible, multiple wildlife escape ramps shall be installed, constructed of wood or installed as an earthen slope in each open trench, hole, or pit that is capable of allowing large (i.e. deer) and small (i.e. snakes) from escaping on their own accord. Prior to the initiation of construction each day and prior to the covering of the trench at the conclusion of work each day, a Qualified Biologist or on-site personnel shall inspect the open trench, pit, or hole for wildlife. If wildlife is discovered, it shall be allowed to leave on its own accord.

Open Pipes Restriction: All pipes, culverts, or similar structures that are stored at the construction vertically or horizontally on-site for one or more overnight periods will be securely capped on both ends prior to storage and thoroughly inspected for wildlife prior to implementation at the Project site by a Qualified Biologist or Biological Monitor.

Fence and Signpost Restriction: Any fencing posts or signs installed temporarily or permanently throughout the course of the Project shall have the top three post holes covered or filled with screws or bolts to prevent the entrapment of wildlife, specifically birds of prey. The Qualified Biologist or Biological Monitor shall be

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responsible for ensuring compliance with this measure throughout the course of the Project and shall inspect each post.

Western Bumble Bee; Section 4, Page 36

Issue: Mitigation measure Biological Resources 4 is insufficient to reduce Project impacts to western bumble bee to less-than-significant levels. Biological Resources 4 states that mitigation will be proposed and an ITP will be obtained if western bumble bee are identified during a single preconstruction survey conducted no more than 48 hours prior to vegetation removal or ground disturbance. A single preconstruction survey conducted at a time of year which is dependent upon Project activity rather than periods of bumble bee activity would be inadequate to conclude presence or absence of the species.

Western bumble bee are a candidate species for listing under CESA, and as such, are afforded the same protections as CESA-listed species (Fish and Game Code § 2608). Project activities such as vegetation removal, clearing, grubbing, and grading work on-site may result in direct mortality through crushing or filling of active bee colonies and hibernating bee cavities. Project development may result in indirect take through loss of suitable breeding and foraging habitats, and loss of native vegetation that may support essential foraging habitat.

Recommendation 4: CDFW recommends the following changes to mitigation measure Biological Resources 4. Please note that further guidance on habitat assessments and 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 changes are in **bold** and language recommended for removal is identified by ~~strike through~~.

Biological Resources 4: Prior to commencement of ~~ground disturbance or vegetation removal from the project site,~~ **ground disturbing activities, a qualified wildlife biologist shall perform a habitat assessment of the Project site and surrounding landscape to identify and map suitable nesting, foraging, and overwintering habitat. If suitable habitat is identified, a qualified wildlife biologist shall perform a focused preconstruction surveys** of the project site for western bumble bee to determine the presence ~~or absence~~ of this species. ~~The survey shall be conducted no more than 48 hours prior to vegetation removal or ground disturbance.~~ **To maximize probability of detection, a minimum of three focused surveys should be conducted during the colony active period (i.e., April through September) and when floral resources are in peak bloom.** If any western bumble bee are identified ~~or if surveys are not conducted and presence is presumed,~~ the biologist shall develop appropriate mitigation to protect the species and compensate for

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potential habitat loss. The mitigation shall be determined in consultation with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) and implemented to the satisfaction of those agencies. Incidental take permits shall be obtained from these agencies prior to the County issuing a grading permit.

Recommendation 5: CDFW also recommends the following avoidance and minimization measure be included in a revised IS/MND:

Construction Monitoring for Western Bumble Bee: If suitable nesting, foraging, or overwintering habitat is identified within the Project site during the habitat assessment, a biological monitor with experience conducting surveys for special-status bumble bee species shall be present onsite during vegetation or ground-disturbing activities that take place during any of the “Queen and Gyne Flight Period and Colony Active Period” (February – October).

COMMENT 3: Nesting Bird Impacts Avoidance

Nesting Birds; Section 4, Page 40

Issue: Mitigation measure Biological Resources 5 would not adequately reduce impacts to nesting birds to a less-than-significant level, as the proposed survey dates and radii would not adequately detect all nesting birds which may be impacted by Project activities. Following surveys, sufficient protective buffers and monitoring would also need to be implemented to fully avoid impacts to nesting birds.

The IS/MND identifies multiple bird species with potential to occur within the Project area, including white-tailed kite and golden eagle. Though suitable nesting habitat is absent from the Project site, the IS/MND identifies large trees adjacent to the Project site which may provide suitable nesting habitat. Construction activities, including grading, ground disturbance, operation of heavy machinery, and the movement of workers, may generate noise or visual disturbances which may in turn result in nest abandonment, reduced reproductive success, or loss or reduced health or vigor of eggs or young.

Take of nesting birds, birds in the orders Falconiformes or Strigiformes, and migratory nongame bird as designated in the federal MBTA is a violation of Fish and Game Code (§ 3503, 3503.5, 3513). Consistent with CEQA Guidelines, Section 15380, the status of the white-tailed kite and golden eagle as Fully Protected species (Fish & G. Code § 3511) qualifies them as endangered, rare, or threatened species under CEQA.

Recommendations: CDFW recommends the following changes to Biological Resources 5 in order to mitigate impacts to less-than-significant levels.

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Recommended changes are in **bold** and language recommended for removal is identified by ~~strikethrough~~.

Biological Resources 5: If project grading or construction is scheduled to take place between **February 1 – September 15**, a preconstruction survey of the project vicinity for nesting birds shall be conducted by a qualified biologist experienced with the nesting behavior of bird species of the region. The survey shall determine if active nests are present within the planned area of disturbance or within ~~200 feet of the construction zone for passerines and within 500 feet for raptors~~ **250 feet for non-raptors and 1,000 feet for raptors**. The survey shall be performed no more than 14 days prior to the commencement of construction activities, **and a second focused survey shall be conducted within 48 hours prior to construction activities** that would occur during the nesting/breeding season. If ground disturbance activities are delayed following a survey, then an additional preconstruction survey shall be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities. **If a lapse of Project-related activities of seven days or longer occurs, another focused survey will be conducted before Project activities can be reinitiated.** Copies of the preconstruction survey(s) shall be submitted to the Contra Costa County Department of Conservation and Development, Community Development Division (CDD) and the California Department of Fish and Wildlife.

If an active bird nest is found within the survey radii, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. ~~If an active nest is present, a minimum exclusion buffer of 100 feet shall be maintained during construction activities for passerine birds, and a minimum of 200 feet for raptors.~~ **A protective buffer shall be established by a qualified biologist** distance shall be determined by a competent biologist based on the site conditions—such as whether the nest is in a line of sight of the construction—and the sensitivity of the birds nesting. **Typical protective buffers are as follows: 1) 1,000 feet for large raptors such as buteos, 2) 500 feet for smaller raptors such as accipiters, and 3) 250 feet for passerines. No Project personnel or equipment shall be allowed to enter the protective buffer until the Qualified Biologist determines that the young have fully fledged and will no longer be adversely affected by the Project.**

A Qualified Biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings, and the nest site(s) shall be monitored by the biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. The

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perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by a qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a biological monitor during those periods when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. All buffers shall be shown on all sets of construction drawings.

II. Editorial Comments and/or Suggestions

The IS/MND indicates that there will be no impact to riparian habitat or other sensitive natural communities identified by CDFW. However, two ephemeral drainages are identified on the subject property and potential impacts to these drainages are analyzed in conjunction with analysis of impacts to two potential seasonal wetlands identified within the property. Please be advised that ephemeral drainages can support sensitive natural communities and should be treated as one if botanical surveys have not been performed to identify their absence. Please also be advised that LSA Notification may be required for Project-related impacts to these features.

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 recommends that the IS/MND be revised to evaluate the potentially significant impacts above, identify any previously undisclosed impacts, and identify enforceable mitigation measures to reduce identified significant impacts to a level of less-than-significant with mitigation. CDFW appreciates the opportunity to comment on the IS/MND to assist Contra Costa County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Torrey Soland, Environmental Scientist, at (707) 266-2878 or Torrey.Soland@wildlife.ca.gov; or Sara Kern, Senior Environmental Scientist (Supervisory), at (916) 531-4465 or Sara.Kern@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell

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Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024110934)

REFERENCES

Moraga Orinda Fire Protection District. (n.d.) *Exterior Wildfire Hazard Abatement Requirements*. <https://www.mofd.org/our-district/fuels-mitigation-fire-prevention/abatement-requirements-english>.

USFWS. (2011, September). Alameda Whipsnake (*Masticophis lateralis eurxanthus*) 5-Year Review: Summary and Evaluation.