



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



January 16, 2025

Clarence Chu, District President  
Reclamation District 369  
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Subject: Locke Multi-Benefit Flood Risk Reduction Planning Project,  
Initial Study/Mitigated Negative Declaration, SCH No. 2024120741,  
Sacramento County

Dear Clarence Chu:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (MND) from Reclamation District 369 for the Locke Multi-Benefit Flood Risk Reduction Planning Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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 as provided by the Fish and Game Code. As

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<sup>1</sup> 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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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.

## REGULATORY AUTHORITY

### California Endangered Species Act and Native Plant Protection 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 or the Native Plant Protection Act (NPPA), 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.

CESA-listed species identified that may occur within the Project area include, but are not limited to, white sturgeon (*Acipenser transmontanus*), delta smelt (*Hypomesus transpacificus*), longfin smelt (*Spirinchus thaleichthys*), Central Valley spring-run chinook salmon (*Oncorhynchus tshawytscha pop. 11*), Sacramento River winter-run chinook salmon (*Oncorhynchus tshawytscha pop. 7*), California tiger salamander – central California Distinct Population Segments (*Ambystoma californiense pop. 1*), giant gartersnake (*Thamnophis gigas*), tricolored blackbird (*Agelaius tricolor*), Swainson's hawk (*Buteo swainsoni*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), riparian brush rabbit (*Sylvilagus bachmani riparius*).

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, but are not limited to, Crotch's bumble bee (*Bombus crotchii*) and burrowing owl (*Athene cunicularia hypugaea*).

Plants identified as rare or endangered under the NPPA that may occur within the Project area include but are not limited to Mason's lilaepsis (*Lilaeopsis masonii*).

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

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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 white-tailed kite (*Elanus leucurus*) and California black rail (*Laterallus jamaicensis coturniculus*) 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.

### **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

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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.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Emily Papalardo, DDC Engineering Co., Inc.

**Objective:** The objective of the Project is to improve the Meadows Cross Slough right bank levee (TMXS-R). Primary Project activities include conducting geotechnical explorations of up to 16 borings alongside the TMXS-R levee to evaluate the condition and composition of the structure; removing an existing 10-inch-diameter temporary pipeline currently used for draining a 221-acre landside drainage and replacing it with a 12-inch-diameter pipeline; removing two abandoned, buried corroded steel pipelines within the levee segment; removing and replacing an existing five horsepower (HP) electric pump; and conducting bathymetric surveys within the waterways adjacent to the levee. Trees and shrubs would be trimmed or removed to provide clearance for access by Project equipment. An aggregate base would be added to the surface of the levee crown once geotechnical borings and pipeline replacement is completed.

**Location:** The Project site is located approximately 0.70-mile from the community of Locke, in unincorporated Sacramento County. Project coordinates are Latitude [38.264167], Longitude [-121.509306]. The Project area consists of the Sacramento River left bank west (SACR-L), the Meadows Slough left bank levee (TMSS-L), and the TMXS-R.

**Timeframe:** Work is expected to occur during one season. Tree trimming, tree removal, and brush removal is expected to take less than 30 days, outside of nesting bird season if feasible. Ground-disturbing activities are expected to require 60 days collectively.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist Reclamation District 369 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 mitigation measures, including those CDFW recommends, CDFW concludes that a MND is appropriate for the Project.

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### **COMMENT 1: Mitigation for Impacts to Sensitive Natural Communities**

**Issue:** It is not clear from the IS/MND what the extent of Project impacts will be upon sensitive natural communities, and the mitigation proposed by Mitigation Measure BIO-12 is not specific (p. 3-55). As a result, it cannot be concluded that impacts have been mitigated to a less-than-significant level.

The IS/MND indicates that sensitive natural communities including valley oak woodland, riparian forest, and willow riparian habitats will be impacted by Project activities. However, the IS/MND does not specifically quantify Project impacts to sensitive natural communities, nor does it disclose how these impacts would be quantified. The IS/MND identifies the general composition of each community on site, noting that valley oaks, among other species, occur within both the valley oak woodland and riparian forest communities. Oaks are keystone species, providing food and habitat for a wide variety of wildlife. They support biodiversity, provide cooler stream temperatures by shading water, and reduce soil erosion. The IS/MND also does not indicate whether mitigation will be provided per acre of impact, per-tree, or on some other basis. Information pertaining to the maturity, and therefore habitat value, of trees to be impacted, as well as clarification of the basis of mitigation, must be provided to facilitate meaningful review of the mitigation proposed.

Additionally, mitigation measure BIO-12 states that mitigation for permanent impacts to sensitive natural communities shall be provided at a minimum 1:1 ratio but does not discuss under which circumstances a higher ratio would be provided. It does not appear to indicate that mitigation will be provided for temporary impacts. A temporal loss exists for regaining the specific habitat that trees provide such as canopy cover, trunk and branch cavities, downed woody debris, and snags, and should be mitigated for appropriately. There also exists a permanent loss due to the slow growth and low rate of replacement for certain tree species, including valley oaks. A 1:1 mitigation ratio may not sufficiently offset the habitat value lost due to Project activities.

CDFW offers the following recommendations to ensure impacts to sensitive natural communities are reduced to a less-than-significant level:

**Recommendation:** CDFW recommends that all anticipated Project impacts be quantified and disclosed in a recirculated IS/MND. The recirculated IS/MND should list the species, diameter at breast height (DBH), and associated habitat type of each tree to be impacted. It should also quantify the area of impact to each sensitive natural community and clarify the basis on which mitigation will be provided (i.e. per acre, per tree, or both).

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**Recommendation:** CDFW recommends that the recirculated IS/MND propose mitigation which appropriately compensates for the value of habitat permanently or temporarily impacted by Project activities. Compensation should be commensurate with the value of the habitat impacted, and the longer it takes to replace the function or ecosystem services of the habitat lost, the greater the mitigation ratio of replacement habitat should be. Permanent impacts should have a higher mitigation ratio than temporary impacts, and an even higher mitigation ratio should be applied for impacts to mature oak woodland.

**Recommendation:** CDFW recommends that the recirculated IS/MND propose specific and enforceable mitigation for impacts to sensitive natural communities. All temporary Project impacts should be restored to approximate pre-Project conditions. Permanent Project impacts should prioritize using an “in-kind” and “on-site” approach to the extent possible. If “off-site” mitigation will be necessary, the location of proposed mitigation should be determined in advance of CDFW permit application. Compensatory mitigation for loss of sensitive natural communities (e.g. valley oak woodland, riparian forest, willow riparian, slough, freshwater emergent wetlands, and wetlands) should be based on both the acreage of habitat lost and the species and size (DBH) of trees to be impacted. Appropriate compensatory mitigation should be through preservation and protection in perpetuity of equal or higher quality habitat, or through creation, enhancement, and/or restoration. Replanted or restored mitigation sites should be monitored for a 10-year period, and a mitigation and monitoring plan (MMP) should be developed. The MMP should include success criteria to be met at the end of the monitoring period to ensure equal or greater replacement of oak trees. If success criteria are not met, the mitigation plan should include adaptive management actions along with additional years of monitoring as well as additional mitigation for the temporal loss. If banking credits will be purchased, the bank should be determined in advance of CDFW permit application.

## **COMMENT 2: Giant Garter Snake**

**Issue:** CDFW acknowledges and appreciates the inclusion of mitigation measure BIO-8 to address potential Project impacts to giant garter snake, a state threatened species. Mitigation measure BIO-8 states that giant garter snakes may be captured and relocated with prior CDFW and USFWS approval.

Since giant garter snake is a CESA-listed species and is protected from any “take” unless otherwise authorized by the department (Fish & G. Code § 2080). Capture and relocation of giant garter snake would be considered “take,” which is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” (Fish & G. Code § 86). As such, mitigation measure BIO-8 may not be sufficient

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to avoid potentially significant impacts to giant garter snake or the habitats on which they depend.

**Recommendation:** If “take” of giant garter snake or any other species listed under CESA cannot be avoided either during Project activities or over the life of the Project, a CESA permit should be obtained (pursuant to Fish & G. Code § 2080 et seq.).

### **COMMENT 3: Swainson’s Hawk**

**Issue:** CDFW acknowledges and appreciates the incorporated mitigation measures BIO-9a and BIO-9b to minimize impacts to Swainson’s hawk during Project activities.

According to California Natural Diversity Database (CNDDDB), there is a relatively high density of documented Swainson’s hawk nesting sites in close proximity to the Project site, and the species is known to have high nest site fidelity, meaning they return to the same site year after year (Estep 1989, Woodbridge et al. 1995). Swainson’s hawk were observed foraging throughout the Project area during preliminary field surveys, and the IS/MND identifies suitable nesting habitat within oak woodlands, willow riparian, and riparian forest within the Project site. If Swainson’s hawk are nesting within range during Project activities, particularly during the operation of heavy equipment, the Project has the potential to impact nesting Swainson’s hawk through auditory or visual disturbances above ambient levels, which may result in Swainson’s hawk nest abandonment and loss of eggs or reduced health and vigor and loss of young.

Swainson’s hawk is protected by MBTA and is a CESA-listed species. As such, any take of Swainson’s hawk is a violation of Fish and Game Code (§ 2080, 3503, 3503.5, 3513).

**Recommendation:** Thank you for proposing to follow the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (SHTAC 2000). CDFW supports the use of this protocol, and further recommends that the SHTAC survey method be strictly followed by starting early in the nesting season (late March to early April) in order to maximize the likelihood of detecting an active nest. Surveys should be conducted within a minimum five-mile radius of the proposed Project area and should be completed for at least the two survey periods immediately prior to initiating any Project-related construction work. Raptor nests may be very difficult to locate during egg-laying or incubation, or chick brooding periods (late April to early June) if earlier surveys have not been conducted. These full-season surveys may assist with Project planning,

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development of appropriate avoidance, minimization and mitigation measures, and may help avoid any Project delays.

**Recommendation:** If “take” of Swainson’s hawk or any other species listed under CESA cannot be avoided either during Project activities or over the life of the Project, an ITP must be obtained from CDFW (pursuant to Fish and Game Code Section 2080 et seq.). Thank you for incorporating a no-disturbance buffer of up to 0.5 miles for any active Swainson’s hawk nests. If an active nest is identified within the Project’s no-disturbance buffer up to 0.5 miles, the Permittee should seek a CESA permit prior to commencing the Project if work is planned during nesting season. More information on the CESA permitting process can be found on the CDFW website at <https://wildlife.ca.gov/Conservation/CESA>.

#### **COMMENT 4: Burrowing Owl**

**Issue:** The IS/MND acknowledges that burrowing owl have the potential to occur and nest in non-native annual grassland within the Project site (p. 3-30, 3-37). It states that the likelihood of utilization is low because the Project area is not mapped within or connected to known breeding patches. Mitigation Measure BIO-9a proposes to conduct surveys in accordance with Staff Report on Burrowing Owl Mitigation (California Burrowing Owl Consortium, 1993), but the IS/MND does not further evaluate Project impacts to burrowing owl.

Burrowing owl is a candidate for listing under CESA and is afforded the same legal protections as CESA-listed species while under review (Fish & G. Code § 2608). Project activities including tree modification and removal may be conducted in the burrowing owl wintering season (September 1 to January 1). Such activities may result in reduced health and vigor, or mortality, of owls from wintering burrow abandonment caused by auditory and visual disturbances (Klute et. al 2003). Burrowing owl can be impacted up to 500 meters or 1,640 feet away from a project from auditory and visual disturbances (CDFW 2012). Therefore, if burrowing owl are present on or within 1,640 feet of the Project site, Project impacts to burrowing owl would be potentially significant.

CDFW offers the following recommendations to avoid “take” or adverse impacts:

**Recommendation:** The qualified biologist shall follow the CDFW *2012 Staff Report on Burrowing Owl Mitigation* (CDFW 2012 Staff Report) habitat assessment and survey methodology prior to initiating Project activities during the burrowing owl wintering season from September 1 to January 31. Surveys shall encompass a sufficient buffer zone to detect owls nearby that may be impacted, which shall be a minimum of 1,640 feet unless otherwise approved in writing by CDFW. Surveys shall include four non-breeding season surveys spread evenly throughout the



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nonbreeding season, pursuant to the CDFW 2012 *Staff Report*. Time lapses between surveys or Project activities shall trigger subsequent surveys, as determined by a qualified biologist, including, but not limited to, a final survey within 24 hours prior to ground disturbance and before construction equipment mobilizes to the Project area. If burrowing owl are discovered within the buffer zone at any time, work shall cease and shall not resume until CDFW has been consulted and the Project has demonstrated compliance with CESA to CDFW satisfaction. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a “take” avoidance, minimization, or mitigation measure.

**Recommendation:** If “take” of burrowing owl or any other CESA-candidate or listed species cannot be avoided either during Project activities or over the life of the Project, an ITP must be obtained from CDFW (pursuant to Fish and Game Code Section 2080 et seq.).

#### **COMMENT 5: Nesting Birds**

**Issue:** CDFW acknowledges and appreciates the incorporated mitigation measures BIO-9a and BIO-9b to minimize impacts to nesting birds during Project activities. These mitigation measures may not be sufficient to avoid potentially significant impacts to nesting birds during Project activities.

The IS/MND lists bird species which have the potential to occur within the Project site, including state-endangered western yellow-billed cuckoo; state-threatened Swainson’s hawk; state-threatened tricolored blackbird; CESA-candidate burrowing owl; state-fully protected white-tailed kite; state-fully protected California black rail; and state species of special concern including grasshopper sparrow, northern harrier, Modesto song sparrow, and yellow-headed blackbird. 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. Grading, tree removal, and vegetation removal may also result in direct take of nesting birds.

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). Consistent with CEQA Guidelines, Section 15380, the status of the white-tailed kite and California black rail as Fully Protected species (Fish & G. Code § 3511) qualifies them as endangered, rare, or threatened species under CEQA.

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CDFW recommends several additions or modifications to the measures to better ensure impacts are reduced to less-than-significant levels:

**Recommendation:** If no established survey protocol exists, CDFW recommends the following minimum survey radii: (1) 250 feet for Passerines and (2) 1,000 feet for raptors such as Buteo spp.

**Recommendation:** CDFW recommends that the qualified biologist complete surveys no more than five days prior to the start of Project activity, and that surveys are repeated if Project activities lapse for a period of seven days or longer.

**Recommendation:** CDFW recommends the following nest avoidance buffers be incorporated in place of the buffers proposed in Mitigation Measure Bio-9b: i) 250 feet for passerines and ii) 1,000 feet for raptors such as Buteos.

#### **COMMENT 6: Rare Plant Relocation**

**Issue:** Transplantation of plants as proposed by mitigation measure BIO-1 may not be sufficient to mitigate for impacts to special-status plants.

Where impacts to special-status plants cannot be avoided during Project activities, mitigation measure BIO-1 proposes the option to “transplant, salvage, cultivate, or re-establish the species at suitable sites.” CDFW’s 2017 Policy and Procedures for Conservation and Translocations of Animals and Plants identifies several variables which contribute to the risk of failure with plant translocations, including variances in environmental conditions between locations and inadequate maintenance and monitoring following transplant. Due to the high risk of failure associated with translocation, this may not result in no-net-loss of special-status plant species. Please be advised that CDFW has similar concerns regarding the success of potential translocation of elderberry shrubs, as described in mitigation measure BIO-5.

The IS/MND identifies Mason’s lillaeopsis, a state rare plant, as having potential to occur within the Project site. State rare plants are protected by the NPPA, and because “take” is necessary to conduct translocations, CDFW’s authorization through a CESA ITP would be required prior to translocation of protected plants.

#### **COMMENT 7: Fish Entrainment Impacts**

**Issue:** The IS/MND does not analyze potential impacts to special-status fish species associated with their entrainment during the ongoing operation of the pump or 12-inch pipeline proposed for installation. The Project site is within range for several special-status fish species, including state-endangered delta smelt, state-threatened longfin smelt, CESA-candidate white sturgeon, and seven state species of special

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concern. Entrainment of individual fish may result in their direct mortality, and if this impact is not analyzed and mitigated for, impacts may be potentially significant. Furthermore, the Project site is within critical habitat and may provide spawning habitat for delta smelt; coupled with the high natural mortality of young fishes, entrainment of larval fish may compromise population resilience (Grimaldo et. al., 2011). The Project therefore may substantially reduce or restrict the range of a rare, threatened, or endangered species, which would be a mandatory finding of significance pursuant to CEQA Guidelines § 15065.

**Recommendation:** CDFW recommends the IS/MND be revised and recirculated to analyze this potentially significant impact for evaluation as part of the CEQA public disclosure process. To mitigate for this potentially significant impact, CDFW recommends that the IS/MND be revised to require the Project incorporate and follow CDFW's Fish Screen Policy and Fish Screening Criteria where applicable. Both of which can be found in the California Salmonid Stream Habitat Restoration Manual, available online at <https://wildlife.ca.gov/Grants/FRGP/Guidance#580984201-guidance-documents>.

## **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 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.)


## **CONCLUSION**

CDFW appreciates the opportunity to comment on the IS/MND to assist Reclamation District 369 in identifying and mitigating Project impacts on biological resources.

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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](mailto:Torrey.Soland@wildlife.ca.gov) or Sara Kern, Senior Environmental Scientist (Supervisory), at (916) 531-4465 or [Sara.Kern@wildlife.ca.gov](mailto:Sara.Kern@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
Erin Chappell  
Regional Manager  
Bay Delta Region

cc: Office of Planning and Research, State Clearinghouse, Sacramento

## REFERENCES

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