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GAVIN NEWSOM, Governor  
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December 16, 2019

Governor's Office of Planning & Research

**DEC 16 2019**

## STATE CLEARINGHOUSE

Mr. Adam Ely, Director  
San Mateo County Manager's Office  
Project Development Unit  
1402 Maple Street  
Redwood City, CA 94063  
[krodgers@smcgov.org](mailto:krodgers@smcgov.org)

Subject: Cordilleras Mental Health Center Replacement Project, Draft Environmental Impact Report, SCH #2015072003, City of Redwood City, County of San Mateo

Dear Mr. Ely:

The California Department of Fish and Wildlife (CDFW) has reviewed the draft Environmental Impact Report (draft EIR) prepared by the County of San Mateo for the proposed Cordilleras Mental Health Center Replacement Project (Project) located in the County of San Mateo. CDFW is submitting comments on the draft EIR regarding potential impacts to biological resources associated with the proposed Project.

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA) §15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as approval under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our jurisdiction, CDFW offers the following comments and recommendations regarding the Project.

### PROJECT DESCRIPTION AND LOCATION

The proposed Project includes the replacement of the Cordilleras Mental Health Center (CHMC) with a new facility to comply with current building safety standards, current psychiatric treatment practices, and to increase occupancy capacity. The proposed Project is located at 200 Edmonds Road, Redwood City, CA 94062 in the County of San Mateo.

### ENVIRONMENTAL SETTING

The special-status species that are known to occur, or have the potential to occur in or near the Project site, include:

- California red-legged frog (*Rana draytonii*), federally listed as threatened under the federal Endangered Species Act (ESA) and a state species of special concern;
- Pallid bat (*Antrozous pallidus*), a state species of special concern;

- San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), a state species of special concern;
- San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), federally and state listed as endangered under ESA and CESA, respectively, and a state fully protected species;
- Townsend's big-eared bat (*Corynorhinus townsendii*), a state species of special concern; and
- Western pond turtle (*Emys marmorata*), a state species of special concern.

## COMMENTS

### *Comment 1: Alternatives*

The draft EIR analyzes a No Project Alternative and a Reduced Project Size Alternative. CDFW recommends that the draft EIR analyze the environmental impacts of a Cordilleras Creek daylighting alternative and justify why such an alternative is considered to be infeasible.

Cordilleras Creek flows beneath CHMC through a series of culverts. The Project would create an open space area above the culverted channel, allowing adequate space to daylight the creek. Instead the Project proposes to construct a new system of larger culverts. Daylighting the creek would allow natural creek processes to reestablish and increase riparian habitat. Daylighting the creek may also be the environmentally superior alternative per CEQA Guidelines section 15126.6(e)(2).

### *Comment 2: Landscaping Plan*

In section 2.42.4, Landscaping Plan, the draft EIR states that the landscaping plan is designed to replace removed trees and habitat value as well as serving as a healing tool for CMHC occupants. In section 4.3.6, Loss of Woodlands, the draft EIR states that the landscape plan will restore 0.96 acres of woodland. However, it is unclear whether landscaped areas will be restored as natural habitats and allowed to develop naturally or if landscaped areas will be manicured and cleared of understory.

CDFW recommends that the draft EIR provide specific maintenance details of the landscaped areas so that their ecological value can be evaluated. Details should include, but are not limited to, irrigation regime, tree trimming, and leaf litter and woody debris (e.g., fallen tree limbs, fallen trees) maintenance.

CDFW recommends that landscape areas be returned to a natural state, which includes the accumulation of understory vegetation, woody debris, and leaf litter. Returning landscaped areas to a natural state will allow development of natural vegetation communities and habitat features that provide foraging, cover, and habitat for species (e.g., salamanders, San Francisco dusky-footed woodrats).

If the understory cannot be left to develop into a natural state, additional trees should be planted in areas where an understory can develop to mitigate for habitat impacted by the proposed Project.



*Comment 3: San Francisco Garter Snake Status*

Section 4.2.4.4 of the draft EIR does not identify San Francisco garter snake as a fully protected species.

San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) is a fully protected species under Fish and Game Code. In section 4.2.4.4 of the draft EIR, please indicate that San Francisco garter snake is a fully protected species and that for the purposes of development projects, fully protected species cannot be taken or possessed at any time.

*Comment 4: Section 4.3.63 Loss of Woodlands*

The draft EIR states that the proposed Project requires the removal of 2.3 acres of oak woodland and that the loss of oak or other non-timber woodlands in San Mateo County is considered a significant biological impact. However, the draft EIR does not explain whether defensible space management is considered in oak woodlands impacts.

CDFW recommends that the draft EIR fully explain the impacts of defensible space management to oak woodlands. CDFW also recommends that these impacts be appropriately mitigated, if not fully avoided.

Defensible space management typically decreases oak woodland understory habitat by clearing woody debris and leaf litter. CDFW views the understory of oak woodlands as habitat for species and as part of the overall oak woodland ecosystem. Therefore, not only should oak trees be retained, but the understory should be left intact.

*Comment 5: Mitigation Measure Bio-2 Defensible Space Management Plan*

The draft EIR states that the Defensible Space Management Plan has not been completed but will include protective measures for San Francisco collinsia and oak-bay woodlands. Please provide an overview of the protective measures expected to be included in the Defensible Space Management Plan. Indicating that a plan will be prepared in the future to address project impacts does not allow for independent evaluation of the impact analysis or satisfy the disclosure requirements of CEQA (CEQA Guidelines section 15126.4).

CDFW strongly recommends that plan also include protective measures to retain oak woodland and oak-bay woodland understory. Protective measures can include but are not limited to the retention of accumulated leaf litter and wooded debris.

*Comment 6: Mitigation Measure BIO-7 Habitat Mitigation and Monitoring Plan*

The draft EIR states that impacted habitat will be replaced at a minimum of a 1:1 ratio with restoration or enhancement of biological functions and values in the watershed within five years. Oak trees take decades to mature, and disturbed vegetation communities take many years to proceed through successional processes. It is unlikely that replacement of habitat will restore habitat function in the time frame indicated, particularly at a 1:1 ratio. In the meantime, the Project would result in a significant net habitat loss.

For oak woodland mitigation, CDFW strongly recommends that the Project mitigate for oak woodland impacts by:

- 1) On-site plantings of a minimum of 15 oak trees for every large oak tree (15-inches diameter at breast height or greater) removed, for a minimum 15:1 ratio. On-site plantings of a minimum of 10 oak trees for 1 oak trees (15-inches diameter at breast height or less) removed, for a minimum 10:1 ratio. CDFW recommends using a higher planting ratio for large trees, as large oaks have slow growth rates and takes decades to reestablish.

The Project proposes to plant larger oak trees, in lieu of saplings. Mature oak trees are difficult to transplant, as transplanting severs mycorrhizal associations and requires removal of up to two-thirds of the mature root system. If planting of larger oak trees is done to mitigate for oak tree removal, planting areas should be maintained for at least 10 years, and dead or diseased oak trees should be replanted. If similarly sized oaks are not replanted, additional oak trees should be replanted to reestablish tree canopy and habitat as quickly as possible. Mature trees should not be taken from other wildland areas for replanting at the Project site, as this would result in off-site habitat impacts. Planting should be done in disturbed oak woodlands rather than converting intact grassland habitats.

- 2) Preservation of on-site oak woodland habitat of 2 acres for every 1 acre impacted into a conservation easement. Please note that the oak woodland habitat preserved in the conservation easement should be of equal or greater habitat value than the habitat impacted. If an off-site conservation easement is desired, the ratio should be higher than 2:1, since oak woodland protection would not be preserved within the property.

As recommended in the above comments, oak woodland understory should be maintained in the above mitigation options.

## **REGULATORY REQUIREMENTS**

### *California Endangered Species Act*

Please be advised that a CESA Permit must be obtained 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. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a 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 [CEQA section 21001(c), 21083, and CEQA Guidelines section 15380, 15064, 15065]. Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration



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(FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

*Lake and Streambed Alteration Program*

Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code section 1600 et. seq.) for any Project-related activities that will 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, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

**FILING FEES**

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code section 711.4; Pub. Resources Code, section 21089). 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.

Thank you for the opportunity to comment on the Project's draft EIR. If you have any questions, please contact Ms. Monica Oey, Environmental Scientist, at (707) 428-2088 or [monica.oey@wildlife.ca.gov](mailto:monica.oey@wildlife.ca.gov); or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at (707) 576-2786 or [randi.adair@wildlife.ca.gov](mailto:randi.adair@wildlife.ca.gov).

Sincerely,



Gregg Erickson  
Regional Manager  
Bay Delta Region

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