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DEPARTMENT OF FISH AND WILDLIFE  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



March 5, 2020

Governor's Office of Planning & Research

Matt Dulcich  
University of California, Regents of  
1111 Franklin Street, 12<sup>th</sup> Floor  
Oakland, CA 94607

**MAR 05 2020**

**STATE CLEARINGHOUSE**

Dear Mr. Dulcich:

UC Davis Sacramento Campus 2020 Long Range Development Plan Update (PROJECT)  
Notice of Preparation SCH# 2020020161

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation of an Environmental Impact Report (EIR) from the Regents of the University of California for the Project pursuant 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.

## **PROJECT DESCRIPTION SUMMARY**

The Project site is located at the UC Davis Sacramento Campus, off U.S. 50 near the Highway 99/Business 80 interchange within the City of Sacramento in Sacramento County. The Sacramento Campus consists of approximately 150 acres and houses UC Davis

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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.

Health (UCDH), which includes the UC Davis Medical Center, UC Davis School of Medicine, extensive research facilities, outpatient clinics, support facilities, and the Betty Irene Moore School of Nursing, as well as the UC Davis Graduate School of Management's Sacramento Master in Business Administration program. UCDH includes a 625-bed teaching hospital, a National Cancer Institute-designated Comprehensive Cancer Center, and a nationally ranked children's hospital. In 2018-2019, UC Davis Medical Center had over 34,000 inpatient admissions, over 80,000 emergency room visits, and over 900,000 clinic/office visits.

The Project consists of the 2020 update to the Long Ranch Development Plan and will propose general types of campus development and land uses to support projected campus population growth and to enable expanded and new program initiatives. The proposed Aggie Square Phase 1 project consists of approximately 1,150,000 square feet of building space for education, research, residential and commercial uses and parking structure space. The Replacement Hospital Tower includes demolition of the existing tower and construction of approximately 600,000-800,000 gross square feet (gsf) east of the Main Hospital complex's Surgery and Emergency Services Pavilion, plus approximately 100,000 gsf of renovation.

The Project description in the draft EIR should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the draft EIR should include appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to biological resources.

## **ENVIRONMENTAL SETTING**

CDFW recommends three progressive steps in Project impact evaluations: habitat assessment, detection surveys, and impact assessment in evaluating whether projects will have impacts to special-status species. The information gained from these steps will inform any subsequent avoidance, minimization and mitigation measures. The steps for Project impact evaluations are: 1) habitat assessment, 2) surveys, and 3) impact assessment. Habitat assessments are conducted to evaluate the likelihood that a site supports wildlife species and their habitats. Detection surveys provide information needed to determine the potential effects of proposed projects and activities on those species and habitats. Impact assessments evaluate the extent to which wildlife species and their habitat may be impacted directly or indirectly, on and within a reasonable distance of proposed CEQA Project activities. CDFW recommends that the draft EIR include a complete environmental assessment of the existing biological conditions within the Project area including but not limited to the type, quantity and locations of the habitats, flora and fauna. Maps and information regarding the habitat assessment and survey efforts should be included within the draft EIR. Any surveys of the biological conditions and related

environmental analysis should be completed by qualified personnel with sufficient experience in the wildlife and habitats associated with the Project and associated reports should be included as appendices to the draft EIR.

To identify a correct environmental baseline, the draft EIR should include a complete and current analysis of endangered, threatened, candidate, and locally unique species with potential to be impacted by the Project. CEQA guidelines § 15125, subdivision (c) requires lead agencies to provide special emphasis to sensitive habitats and any biological resources that are rare or unique to the area. CDFW recommends that the environmental documentation identify natural habitats and provide a discussion of how the proposed Project will affect their function and value.

CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. Although the CNDDDB is one tool that may identify potential sensitive resources in the area, the dataset should not be regarded as complete for the elements or areas with the potential to be impacted. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship (CWHR) System, California Native Plant Society (CNPS) Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations. In addition, CNDDDB is not a comprehensive database. It is a positive detection database. Records in the database exist only where species were detected and reported. This means there is a bias in the database towards locations that have had more development pressures, and thus more survey work. Places that are empty or have limited information in the database often signify that little survey work has been done there. A nine United States Geologic Survey (USGS) 7.5-minute quadrangle search is recommended to determine what may occur in the region (see Data Use Guidelines on the CDFW webpage <https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>).

## **IMPACT ASSESSMENT AND MITIGATION MEASURES**

Based on habitat assessments and survey results, the draft EIR should clearly identify and describe all short-term, long-term, permanent, or temporary impacts to biological resources under CDFW's jurisdiction, including all direct and foreseeable indirect impacts caused by the proposed Project.

The draft EIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f).) The draft EIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed, and it must permit the significant effects of the Project to be considered in the full environmental context. CDFW also recommends that the environmental documentation provide a scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including

cumulative impacts, in accordance with the provisions of CEQA (Guidelines Section 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions.

The EIR should incorporate mitigation performance standards that would ensure that significant impacts are reduced as expected. Mitigation measures proposed in the EIR should be made a condition of approval of the Project. Please note that obtaining a permit or other authorization from CDFW by itself with no other mitigation proposal may constitute mitigation deferral.

### *Migratory Birds and Birds of Prey*

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) (16 U.S.C., §§ 703-712). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Potential habitat for nesting birds and birds of prey is present within the Project area. The proposed Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its close vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR. Measures to avoid the impacts should include species specific work windows, biological monitoring, installation of noise attenuation barriers, etc.

### *Landscaping*

CDFW has noted that landscaping improvements may be implemented in the Project. CDFW recommends consideration of the Homegrown Habitat Plant List (Sacramento Valley Chapter, California Native Plant Society) (Attachment 1) when developing the final planting palette. The Homegrown Habitat Plant List (HHPL) is the result of a coordinated effort of regional stakeholders with the intent of improving landscape plantings for the benefit of property owners and ecosystem. Including plants from the HHPL is intended to produce the following outcomes for landscaping:

- Increased drought tolerance
- Decreased water use
- Decreased maintenance and replacement planting costs
- Increased functionality for local pollinators and wildlife
  - o Increase in overall biodiversity and ecosystem health
- Increased carbon sequestration and climate change resilience
- Educational opportunities for staff and students

## **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

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during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

[http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

## **FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 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 Notice of Preparation and assist the Lead Agency in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Dylan Wood, Environmental Scientist at 916-358-2384 or [dylan.a.wood@wildlife.ca.gov](mailto:dylan.a.wood@wildlife.ca.gov).

Enclosure: Attachment 1- Homegrown Habitat List

ec: Dylan Wood, Environmental Scientist  
*Department of Fish and Wildlife*

Office of Planning and Research, State Clearinghouse, Sacramento

## Homegrown Habitat Plant List 2019

A	B	C	D	E	F	G	H	
1	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
2	Early	<a href="#">Western Redbud</a>	<i>Cercis occidentalis</i>	P	10'-20'	L	S/PS	Drought-tolerant; also tolerates semi-riparian conditions
3		<a href="#">Red Willow</a>	<i>Salix laevigata</i>	P	30'-50'	H	FS	Wetland-semi riparian; tolerates clay soils; fast grower, semi-deciduous
4		<a href="#">Arroyo Willow</a>	<i>Salix lasiolepis</i>	P	7'-35'	H	FS	Likes marshes/wet areas; spreads by root runners; deciduous
5		<a href="#">Sandbar Willow</a>	<i>Salix exigua</i>	P	10'-23'	H	FS	Constant moisture; spreads by basal shoots to any moisture
6		<a href="#">Valley Oak</a>	<i>Quercus lobata</i>	P	60'-100'	L	FS	Fast growing (20' in 5 years); drought tolerant
7		<a href="#">Scrub Oak</a>	<i>Quercus berberidifolia</i>	P	15'-20'	L	FS/PS	Smaller, drought tolerant, likes medium fast drainage
8		<a href="#">Buck Brush</a>	<i>Ceanothus cuneatus</i>	P	5'-12'	VL	FS	Needs fast drainage; fast to moderate growth, evergreen
9		<a href="#">California Everlasting</a>	<i>Psuedognaphalium californicum</i>	P	3'	VL/L	FS	Semi deciduous, may like some afternoon shade in summer
10		<a href="#">California Blackberry</a>	<i>Rubus ursinus</i>	P	6'	M/H	FS/PS/S	Requires substantial moisture, wide spreading
11		<a href="#">Dutchmans Pipe</a>	<i>Aristolochia californica</i>	P	20'	L/M	S/PS	Deciduous vine, grows in moist woods along streams
12		<a href="#">Baby Blue Eyes</a>	<i>Nemophila menziesii</i>	A	.25'	L	FS/PS	Annual herb
13		<a href="#">Chinese Houses</a>	<i>Collinsia heterophylla</i>	A	.5'	M	S/PS	Annual purple flowering herb, good in containers
14		<a href="#">Lacy Phacelia</a>	<i>Phacelia tanacetifolia</i>	A	3'	VL/L	FS	Tolerates clay soils; good plant for biological pest control
15		<a href="#">Miners Lettuce</a>	<i>Claytonia perfoliata</i>	A	1.3'	L/M	PS	Edible spreading annual herb; in the valley, does best in part shade
16								
17	Early-Mid	<a href="#">Blue Elderberry</a>	<i>Sambucus nigra</i> var. <i>cerulea</i>	P	20'-30'	M	FS	Easy to grow, fast growing deciduous shrub/tree; host plant for endangered Valley Elderberry Longhorn Beetle
18		<a href="#">Interior Live Oak</a>	<i>Quercus wislizenii</i>	P	15'-50'	VL	S/PS	Medium to large evergreen, moderate grower
19		<a href="#">Blue Oak</a>	<i>Quercus douglasii</i>	P	16'-82'	VL	FS/PS	Slow grower deciduous, supports many species
20		<a href="#">Toyon</a>	<i>Heteromeles arbutifolia</i>	P	12'	L	FS/PS	Evergreen shrub easy to grow, white flowers early summer, red berries in fall
21		<a href="#">Shining Willow</a>	<i>Salix lasiandra</i>	P	3'-30'	M/H	FS/PS	Winter deciduous riparian plant, good for restoration projects
22		<a href="#">Mountain Mahogany</a>	<i>Cercocarpus betuloides</i>	P	8'-20'	VL/L	FS/PS	In the valley this plant will do better with PM shade
23		<a href="#">Hollyleaf Redberry</a>	<i>Rhamnus ilicifolia</i>	P	9'	L	PS	PM shade in the valley, siting is critical for success
24		<a href="#">California Broom/Deerweed</a>	<i>Acmispon glaber</i>	P	3'	VL	FS	Not too showy subshrub with high habitat value
25		<a href="#">Skunkbush, Fragrant Sumac</a>	<i>Rhus aromatica</i>	P	8'	L	FS/PS	Winter deciduous shrub, may like PM shade in valley
26		<a href="#">Chaparral Honeysuckle</a>	<i>Lonicera interrupta</i> ( <i>hispidula</i> )	P		VL/L	FS/PS	Hardy, woody chaparral shrub/vine, summer flowering, edible/bitter berries
27		<a href="#">Silver Bush Lupine</a>	<i>Lupinus albus</i>	P	3'	L	FS/PS	Requires good drainage, PM shade in valley
28		<a href="#">Foothill Penstemon</a>	<i>Penstemon heterophyllus</i>	P	5'	L	FS/PS	Perennial evergreen herb. May need pm shade in valley
29		<a href="#">Sonoma Sage</a>	<i>Salvia sonomensis</i>	P	1.3'	VL	PS	Moderately drought tolerant if given part shade
30		<a href="#">Purple Needlegrass</a>	<i>Stipa pulchra</i>	P	3'	VL/L	FS	CA state grass, perennial with deep roots
31		<a href="#">California Poppy</a>	<i>Eschscholzia californica</i>	A	.5'	VL/L	FS	CA State flower, tolerates clay soil, readily reseeds
32		<a href="#">Elegant Clarkia</a>	<i>Clarkia unguiculata</i>	A	.5'	L	FS/PS	Showy pink flowers, reseeds readily
33		<a href="#">Globe Gillia</a>	<i>Gillia capitata</i>	A	1'	L/M	FS	Showy pink to lavender flowers
34		<a href="#">Miniature Lupine</a>	<i>Lupinus bicolor</i>	A	1.3'	L	FS	Showy purple and white flowers, plant with CA poppies
35		<a href="#">Sky Lupine</a>	<i>Lupinus nanus</i>	A	2'	L	FS	Chaparral annual herb

## Homegrown Habitat Plant List 2019

	A	B	C	D	E	F	G	H
36	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
37	Mid	<a href="#">California Buckwheat</a>	Eriogonum fasciculatum	P	2.5'	VL/L	FS	Tough, easy to grow, prefer good drainage
38		<a href="#">Hoary Coffeberry</a>	Frangula californica var tomentosa	P	20'	L	FS/PS	May prefer PM shade in valley
39		<a href="#">California Wildrose</a>	Rosa californica	P	8'	M	FS/PS	Tolerates clay soils; drought-tolerant; spreads through underground runners
40		<a href="#">California Wild Grape</a>	Vitis californica	P	10'-40'	L/M	FS/PS	Common along rivers and streams, winter deciduous
41		<a href="#">Common Yarrow</a>	Achillea millefolium	P	3'	L-H	FS/PS	Looks best with regular water; semi deciduous in drier conditions; can be aggressive
42		<a href="#">Coyote Mint</a>	Monardella villosa	P	2'	L	PS/S	Requires good drainage, needs PM shade in the valley
43		<a href="#">Showy Milkweed</a>	Asclepias speciosa	P	5'	L/M	FS	Tolerates clay soils; spreads through underground rhizomes
44		<a href="#">Imbricate Phacelia</a>	Phacelia imbricata	P	1'	L	FS/PS	Perennial herb; tolerates clay soil; can re-seed
45		<a href="#">Woolly Sunflower</a>	Eriophyllum lanatum	P	2'	L	FS/PS	Summer semi-deciduous; can be extremely drought-tolerant
46		<a href="#">Nude Buckwheat</a>	Eriogonum nudum	P	6'	L	FS	Summer semi-deciduous; leafless stems
47		<a href="#">Blue Wild Rye</a>	Elymus glaucus	P	5'	L	FS/PS	Popular accent grass for gardens; summer semi-deciduous
48		<a href="#">Deergrass</a>	Muhlenbergia rigens	P	5'	L	FS	Attractive bunch grass; easy to grow; grows in most soils
49		<a href="#">Fleabane Daisy</a>	Erigeron foliosus	P	3.3'	L	PS	
50		<a href="#">Lippia</a>	Phyla nodiflora	P	6"	L	FS/PS	Flowering ground cover; spreads rapidly
51		<a href="#">Spider Lupine</a>	Lupinus benthamii	A	2.3'	VL	FS	
52		<a href="#">Seep Monkeyflower</a>	Erythranthe guttata	A	5'	M/H	FS/PS	Aquatic annual plant; good in ponds or rain gardens
53								
54	Mid-Late	<a href="#">Narrowleaf Milkweed</a>	Asclepias fascicularis	P	1.5'	M	FS	Not showy; tolerates clay; host to Monarchs
55		<a href="#">Virgin's Bower</a>	Clematis ligusticifolia	P	30'	L/M	PS/SH	vine; showy white flowers; summer deciduous; part shade to shade
56		<a href="#">Hooker's Evening Primrose</a>	Oenothera elata	P	5'	M-H	FS/PS	Wetland-riparian but still drought tolerant; reseeds aggressively
57		<a href="#">California Fuchsia</a>	Epilobium canum	P	3'	L	FS	Hummingbird favorite; spreads; cut back in winter
58		<a href="#">Gumplant</a>	Grindelia camporum	P	4'	L	FS	Tolerates most soils; can be cut back in winter
59		<a href="#">Snowberry</a>	Symphoricarpos albus	P	6'	L	PS/SH	Moist shady areas; winter deciduous; spreads by rhizomes
60		<a href="#">Slender Woolly Buckwheat</a>	Eriogonum gracile	A	5'	EL/VL	FS/PS	Small annual; tolerates most soils; winter semi-deciduous
61		<a href="#">Common Madia</a>	Madia elegans	A	7'	L	FS/PS	Annual herb; showy yellow flowers; tolerates many soils
62		<a href="#">Common Sunflower</a>	Helianthus annuus	A	5'	M	FS	Tolerates most soils; can get very large
63								
64	Late	<a href="#">California Aster</a>	Symphotrichum chilense	P	5'	VL/L	FS/PS	Tolerates clay soil; winter deciduous; cut back in winter; aggressive spreader
65		<a href="#">California Goldenrod</a>	Solidago californica	P	3'	VL/M	FS/PS/S	Easy to grow; for late color plant with Epilobium canum; spreader
66		<a href="#">Sulphur Buckwheat</a>	Eriogonum umbellulatum	P	7'	VL/M	FS	Showy yellow flowers; variable plant; evergreen
67		<a href="#">Bee Plant</a>	Scrophularia californica	P	4'	L	PS	Strong bee attractant; tolerates most soils; needs good drainage
68		<a href="#">Coyote Brush</a>	Baccharis pilularis	P	10'	VL/L	FS/PS	Tough easy to grow shrub; variable forms; blooms into winter
69		<a href="#">Rubber Rubberbrush</a>	Ericameria nauseosa	P	9'	L	FS	Needs good drainage; summer/fall bloom
70		<a href="#">Vinegarweed</a>	Trichostema lanceolatum	A	1'	L	FS	Does not do well in seed mixes; sow individually; tolerates dry clay soils