



A Tradition of Stewardship
A Commitment to Service

Planning, Building & Environmental Services

1195 Third Street, Suite 210
Napa, CA 94559
www.countyofnapa.org

David Morrison
Director

To: Sarah Fonseca, Native American Heritage Commission, 1550 Harbor Boulevard, Suite 100,
West Sacramento, CA 95691
Laverne Bill, Yocha Dehe Wintun Nation, P.O. Box 18 Brooks CA 95606
Gregg Erickson, CA Department of Fish and Wildlife, 2825 Cordelia Road Suite 100, Fairfield CA 94534

From: Donald Barrella

Subject: Response to Comments - Initial Study/ Negative Declaration
Shannon Ranches, Mitsuko Vineyard Conversion
Agricultural Erosion Control Plan File #P19-00052-ECPA
4189 Withers Road, Napa, CA 94559, APN 047-280-017
SCH #2020029072

Date: April 8, 2020

Attached is a copy of the Response to Comments for the subject project. The report contains our responses to comments provided on the Initial Study/Negative Declaration dated February 20, 2020.

The County could approve the Project on or after **Wednesday April 8, 2020**.

Should you have any questions, please call Donald Barrella at 707-299-1338 or via e-mail to donald.barrella@countyofnapa.org

Respectfully,

A blue ink signature of Donald Barrella.

Donald Barrella
Planner III

cc: Brian Bordona, Deputy Director (via email)
John McDowell, Supervising Planner, Conservation Division (via email)
Patrick Ryan, Engineering Manager, Engineering Division (via email)
Jeannette Doss, Assistance Engineer, Engineering Division (via email)
Laura Anderson, Deputy County Counsel (via email)
Vintage Wine Estates, 205 Concourse Blvd. Santa Rosa CA95403
Nick Patti, Shannon Ranches, PO Box 2037 Clearlake Oaks, CA 95423
Sarah Pistone, LincolnAE LLC., PO Box 1686, Middletown, CA 95461
Heather McCollister (via email)



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David Morrison
Director

TO: Application File #P19-00052-ECPA

FROM: Donald Barrella, Planner III

DATE: April 8, 2020

RE: Response to Comments – Shannon Ranches, Mitsuko Vineyard Conversion
Agricultural Erosion Control Plan File #P19-00052-ECPA
4189 Withers Road, Napa, CA 94559, APN 047-280-017
SCH #2020029072

INTRODUCTION

This memorandum has been prepared by the County Planning Division to respond to comments received by the Napa County Department of Planning, Building and Environmental Services (Napa County) on the Proposed Initial Study/Negative Declaration (Proposed IS/ND) for the Shannon Ranches, Mitsuko Vineyard Conversion #P19-00052-ECPA (proposed project). An IS/ND is an informational document prepared by a Lead Agency, in this case, Napa County, that provides environmental analysis for public review. The agency decision-maker considers it before taking discretionary actions related to any proposed project that may have a significant effect on the environment. The Proposed IS/ND analyzed the impacts resulting from the proposed project and where applicable, identified mitigation measures to minimize the impacts to less-than-significant levels.

This memorandum for the Shannon Ranches, Mitsuko Vineyard Conversion, Agricultural Erosion Control Plan #P19-00052-ECPA Proposed IS/ND, presents the name of the persons and/or organizations commenting on the Proposed IS/ND and responses to the received comments. This memorandum, in combination with the IS/ND, completes the Final IS/ND.

CEQA PROCESS

In accordance with Section 15073 of the CEQA Guidelines, Napa County submitted the Proposed IS/ND to the State Clearinghouse for a 30-day public review period starting February 20, 2020. In addition, Napa County circulated a Notice of Intent to Adopt the Proposed IS/ND to interested agencies and individuals. The public review period ended on March 23, 2020. During the public review period, Napa County received three comment letters on the Proposed IS/ND. Table 1 below lists the entities/persons that submitted comments on the Proposed IS/ND during the public review and comment period. The comment letters are attached as identified in Table 1.

TABLE 1
COMMENTS RECEIVED ON THE PROPOSED IS/MND

Comment N°/ Attachment	Comments Received from	Date Received
1	Native American Heritage Commission (NAHC)	February 29, 2020
2	Yocha Dehe Wintun Nation	March 9, 2020
3	California Department of Fish and Wildlife (CDFW)	March 19, 2020

In accordance with CEQA Guidelines Section 15074(b), Napa County considers the Proposed IS/ND together with comments received, both during the public review process and before action on the project, prior to adopting the Proposed IS/ND and rendering a decision the project. The CEQA Guidelines do not require the preparation of a response to comments for negative declarations; however, this memorandum responds to comments received. Based on review of the comments received, no new potentially significant impacts beyond those identified in the Proposed IS/ND would occur, no new or additional mitigation measures, or project revisions, must be added to reduce impacts to a less than significant level, and none of the grounds for recirculation of the Proposed IS/ND as specified in State CEQA Guidelines Section 15073.5 have been identified. All potential impacts identified in the Proposed IS/ND were determined to be less-than-significant or less-than-significant with mitigation incorporated.

Furthermore, this Response to Comments Memorandum will be provided to the owner/Permittee as **notice** of potential Local, State and Federal permits necessary to implement and operate this project as identified within the attached agency comment letters, and that project approval if granted shall be subject to conditions of approval requiring any and all such permits be obtained prior to the commencement of vegetation removal and earth-disturbing activities (grading) associated with #P19-00052-ECPA.

RESPONSE TO COMMENTS

Comment #1 Native American Heritage Commission (NAHC) (Attachment 1)

Response to Comment 1.1: As disclosed in **Section XVIII (Tribal Cultural Resources)** of the Proposed IS/ND, on March 6, 2019, the County notified pursuant to Public Resources Code Section 21074 (AB-52: Gatto) the Middletown Rancheria, the Mishewal Wappo Tribe of Alexander Valley, and the Yocha Dehe Wintun Nation of the proposed project and consultation invitation. On March 13, 2019, the County received a response letter from the Middletown Rancheria indicating they have no specific comments at this time; however, if any new information or evidence of human habitation is found as the project progresses, the Tribe requested that all work cease and that they be contacted immediately. On March 20, 2019, the County received a response letter from the Yocha Dehe Wintun Nation indicating they have no specific comments at this time. On May 13, 2019, the County sent notification to the Middletown

Rancheria and the Yocha Dehe Wintun Nation acknowledging their response letters and closing the consultation invitation because they did not request consultation. The Mishewal Wappo Tribe of Alexander Valley received the project notice and consultation invitation by March 13, 2019, and no response has been received by the County; therefore, on May 13, 2019 the County sent a consultation closure notice to the Tribe because no consultation request was received within the 30-day notification period. Also see Response to Comment No. 2.1, incorporated herein by reference.

As disclosed and assessed in **Section V (Cultural Resources)** and **Section XVIII (Tribal Cultural Resources)**, of the Proposed IS/ND, impacts to cultural resources including tribal cultural resources are anticipated to be less than significant. Additionally, project approval, if granted, would be subject to the standard conditions identified below to further avoid and protect cultural resources that may be discovered inadvertently.

Cultural Resources – Conditions of Approval: Discovery of historical and archaeological resources, or human remains during construction, grading, or other earth moving activities:

- In accordance with CEQA Subsection 15064.5(f), should any previously unknown historic or prehistoric resources, including but not limited to charcoal, obsidian or chert flakes, grinding bowls, shell fragments, bone, pockets of dark, friable solids, glass, metal, ceramics, wood or similar debris, be discovered during grading, trenching or other onsite excavation(s), earth work within 100-feet of these materials shall be stopped until a professional archaeologist certified by the Registry of Professional Archaeologists (RPA) has had an opportunity to evaluate the significance of the find and suggest appropriate mitigation(s), as determined necessary.
- If human remains are encountered the Napa County Coroner shall be informed to determine if an investigation of the cause of death is required and/or if the remains are of Native American origin. Pursuant to Public Resources Code Section 5097.98, if such remains are of Native American origin the nearest tribal relatives as determined by the State Native American Heritage Commission shall be contacted to obtain recommendations for treating or removal of such remains, including grave goods, with appropriate dignity.
- All persons working onsite shall be bound by contract and instructed in the field to adhere to these provisions and restrictions.

With regard to the adequacy of the Cultural Resource Assessment due to its preparation date, because cultural resources are typically static, the County has determined that the William Self Associates, June 27, 2001, Cultural Resource Assessment to be adequate for CEQA review and disclosure purposes of the subject application. Additionally, no new evidence has been provided which demonstrates that the project may have a potentially significant impact on cultural resources beyond what was analyzed and conditioned for in the Proposed IS/ND; therefore, no further response necessary.

Comment #2 Yocha Dehe Wintun Nation (Attachment 2)

Response to Comment 2.1: The comment indicates the project site is not within the aboriginal territory of the Tribe; and therefore, decline comment on the proposed project. The comment also provides the contact information for a local tribe that may have cultural interest in the project site (the Mishewal Wappo Tribe of Alexander Valley): the comment has been noted and no further response is necessary.

Comment #3 California Department of Fish and Wildlife (CDFW) (Attachment 3)

Response to Comment 3.1: Because that no trees will be removed as a result of the project, as disclosed in the Proposed IS/ND, potentially significant impacts to nesting birds and raptors were not identified. While potentially significant impacts to nesting birds were not identified, to ensure that nesting birds are not inadvertently affected as a result of the project, the pre-construction surveys recommended by CDFW shall be added to the project's conditions of approval as identified below, should the project be approved.

Preconstruction Surveys – Nesting Birds and Swainson's Hawk: The owner/Permittee shall have a qualified biologist conduct a pre-construction nesting bird survey within 7 days of commencement to earthmoving or vegetation removal associated with #P19-00052-ECPA. If nesting birds or raptors are discovered during the pre-construction survey, the qualified biologist who conducted the survey shall develop appropriate avoidance buffers for all active nest sites in consultation with the California Department of Fish and Wildlife (CDFW). Avoidance buffers shall be demarcated in the field with temporary construction fencing, and remain in place until the project biologist has determined that the nest is no longer active. Additionally, the owner/Permittee shall have a qualified biologist conduct a protocol-level survey for the Swainson's Hawk, using the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley, dated May 31, 2000. If nesting Swainson's hawk are discovered within 0.25 miles of the Project site, the Project proponent or project biologist shall consult with CDFW regarding appropriate avoidance and minimization measures to avoid take of this species. Such measures may include delaying construction until the nest is no longer active or setting up appropriate buffers.

Response to Comment 3.2: As disclosed and analyzed in **Section IV (Biological Resources)** and **Section X (Hydrology and Water Quality)** of the Proposed IS/ND, the project does not propose any alteration to a stream, river, or drainage course that would necessitate the need for a Lake and Streambed Alteration Agreement (LSAA) from the CDFW. Furthermore, the comment appears to be related to bypass flows associated with existing surface water rights Permit #20737 (Application #029603) and Permit #20739 (Application #029391).

As indicated in the 'CEQA Process' Section of this memo the Owner/Permittee through these responses to comments has been notified of potential Local, State and Federal permits necessary to implement and operate this project, and that project approval if granted, shall be subject to conditions of approval

requiring any and all such permits be obtained as part of implementation or operation of #P19-00052-ECPA. Additionally, the comment does not make any specific comments on the adequacy of the Proposed IS/MND, no further response is necessary.

Response to Comment 3.3: The CDFW Environmental Filing Fee for a Negative Declaration will be paid upon filing of the CEQA Notice of Determination for this project if approved. No further response necessary.

List of Attachments

Attachment 1 – Native American Heritage Commission letter dated February 28, 2020

Attachment 2 – Yocha Dehe Wintun Nation letter dated March 3, 2020

Attachment 3 –California Department of Fish and Wildlife letter dated March 19, 2020.

Attachment 1

STATE OF CALIFORNIA

Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

February 28, 2020

Donald Barrella, Planner III
Napa County, Department of Planning, Building and Environmental Services

Via Email to: Donald.barrella@countyofnapa.org

Re: SCH# 2020029072, Shannon Ranches, Mitsuko Vineyard Conversion #P19-0052-ECPA (1489 Withers Road) Project, Napa County, California

Dear Mr. Barrella:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR)/Mitigated Negative Declaration (MND) or Negative Declaration prepared for the project referenced above. The review may have included the Cultural Resources Section, Archaeological Report, Appendices for Cultural Resources Compliance, as well as other informational materials. We have the following concerns:

- There is no information in the documents of any contact or consultation with all traditionally, culturally affiliated California Native American Tribes from the NAHC's contact list or Sacred Lands File Search.
- There does not appear evidence that a more recent cultural assessment was completed (within the last three years or so).

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52 (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.)

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)



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COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

(NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Contact Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

If you have any questions or need additional information, please contact me at my email address: Sarah.Fonseca@nahc.ca.gov.

Sincerely,



Sarah Fonseca
Cultural Resources Analyst

Attachment

cc: State Clearinghouse

Attachment 2

RECEIVED

MAR 09

Napa County Planning, Building
& Environmental Services



YOCHA DEHE
CULTURAL RESOURCES

March 3, 2020

Napa County
Attn: Donald Barrella, Planner III
1195 Third Street, Suite 210
Napa, CA 94559

RE: Mitsuko Vineyard Project

Dear Mr. Barrella:

Thank you for your notification of intent letter dated, February 19, 2020, regarding cultural information on or near the proposed Mitsuko Vineyard Project, Napa County. We appreciate your effort to contact us.

The Cultural Resources Department has reviewed the project and concluded that it is not within the aboriginal territories of the Yocha Dehe Wintun Nation. Therefore, we respectfully decline any comment on this project. However, based on the information provided, please defer correspondence to the following:

Mishewal Wappo Tribe of Alexander Valley
Attn: Scott Gadaldon
2275 Silk Road
Windsor, CA 95492

Please refer to identification number YD-03082019-04 in any future correspondence with Yocha Dehe Wintun Nation concerning this project.

Thank you for providing us with this notice and the opportunity to comment.

Sincerely,

Tribal Historic Preservation Officer

cc: Mishewal Wappo Tribe of Alexander Valley



DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

2825 Cordelia Road, Suite 100

Fairfield, CA 94534

(707) 428-2002

www.wildlife.ca.gov

March 19, 2020

Mr. Donald Barrella

Napa County Planning, Building, and Environmental Services

1195 Third Street, Suite 210

Napa, CA 94559

Subject: Shannon Ranches, Mitsuko Vineyard Conversion #P19-0052-ECPA, Draft Negative Declaration, SCH #2020029072, Napa County

Dear Mr. Barrella:

California Department of Fish and Wildlife (CDFW) personnel have reviewed the draft Negative Declaration (ND) for the Shannon Ranches, Mitsuko Vineyard Conversion (Project). CDFW is submitting comments on the draft ND to inform Napa County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

CDFW is providing comments as a Trustee Agency pursuant to the California Environmental Quality Act (CEQA) Section 15386 and is responsible for the conservation, protection, and management of the State's biological resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued 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.

Environmental Setting

The Project will occur on a 365-acre parcel, located at 4189 Withers Road, in the City and County of Napa. The Project site is approximately 4.5 miles southwest of the City of Napa and approximately 7.5 miles southeast of the City of Sonoma. Carneros Creek and Huichica Creek, tributaries to the Napa River, lie approximately 0.6 miles to the northeast and 0.8 miles to the west, respectively. There are three piped drainages on the Project site that are believed to have been undergrounded sometime during the 1980s. Two piped ephemeral streams originate off the property to the west and flow in a easterly direction underneath the Project site before joining a third piped stream that originates off the property to the northwest. The third drainage conveys water in a southeasterly direction before discharging into an approximately 2.5-acre pond located at the southeastern corner of the Project site.

The Project site consists of approximately 60 acres of annual grassland and approximately 11 acres of coast live oak woodland. A few mature bluegum eucalyptus (*Eucalyptus globulus*) line the western property boundary directly adjacent to the Project site. Surrounding land use is predominantly vineyard, except for a small undeveloped annual grassland immediately to the west of the Project site.

Project Description

The proposed Project will develop approximately 47 acres of vineyard within two vineyard blocks. Block 1 will be approximately 41 acres and Block 2 will be approximately 6 acres. Activities associated with vineyard development include earthmoving, vegetation removal, and installation and (ongoing) maintenance of erosion control measures. The vineyard will be developed in one phase over the course of a year. As a result of the Project, 46.42 acres of annual grassland, 0.15 acres of *Eucalyptus* grove, and 0.13 acres of coyote brush (*Baccharis pilularis*) shrub alliance will be permanently impacted.

Existing vineyard on the property is irrigated under surface water rights Permit 20737 (A029603) and Permit 20739 (A029391). The parcel currently receives a base allotment of 39.8 acre-feet of reuse water per year from Napa Sanitation District for purposes of vineyard irrigation, and this same allotment will be used to irrigate the proposed vineyard.

Comments and Concerns

Nesting Birds and Raptors

The Project will result in permanent impacts to annual grassland, which supports, and occurs directly adjacent to, suitable bird and raptor nesting habitat. The draft ND does not propose any avoidance and minimization measures to prevent potentially significant impacts to nesting birds and raptors, which are protected under the Migratory Bird Treaty Act, as well as Fish and Game Code sections 3503 and 3503.5. CDFW recommends that the draft ND include language requiring the Project proponent to have a qualified biologist conduct a pre-construction nesting bird survey within 7 days prior to earthmoving or vegetation removal using large equipment (e.g. bulldozers). If nesting birds or raptors are discovered during the pre-construction survey, the qualified biologist who conducted the survey should develop appropriate avoidance buffers for all active nest sites in consultation with CDFW. Alternatively, construction can be delayed until after the nesting bird season (i.e. September 1) or until the qualified biologist has determined that the nest is no longer active.

Additionally, the Project area has the potential to support Swainson's hawk, a threatened species under CESA; therefore, a qualified biologist should conduct at least one protocol-level survey for the species, in addition to a nesting bird survey, using the Swainson's Hawk Technical Advisory Committee's *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley*, dated May 31, 2000. If nesting Swainson's hawk are discovered within 0.25 miles of the Project site, the Project proponent or the qualified biologist who conducted the surveys should consult with CDFW regarding appropriate avoidance and minimization measures to avoid take¹ of the species. Such measures may include delaying construction until the nest is no longer active or setting up appropriate buffers. If implementation of avoidance measures is infeasible, the ND should outline impacts and mitigation for Swainson's Hawk, and obtain a CESA Incidental Take Permit (ITP) from CDFW prior to starting Project construction. Issuance of a CESA ITP requires that a project proponent fully mitigate for their project's impacts to the covered species, and such mitigation measures must be described in the project's CEQA document before CDFW can issue the permit. In the event that the Project proponent wishes to obtain a CESA ITP, CDFW is available to meet with

¹ Fish and Game Code section 86: "Take" means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill

the Project proponent to work through the permitting process. More information about applying for a CESA ITP can be found on our website:

<https://wildlife.ca.gov/Conservation/CESA/Permitting/Incidental-Take-Permits>.

On-Stream Diversion/Impoundment

On-stream ponds/reservoirs are subject to the requirements in Fish and Game Code section 5937, which states:

"the owner of any dam shall allow sufficient water at all times to pass through a fishway, or in the absence of a fishway, allow sufficient water to pass over, around, or through the dam to keep in good condition any fish that may be planted or exist below the dam."

There is an approximately 2.5-acre on-stream pond/reservoir at the southeast corner of the Project site that operates via fill and spill (i.e. when the reservoir reaches maximum capacity it spills onto a concrete spillway before entering an unnamed tributary to Mud Slough and thence the Napa River). Fish and Game Code section 1602 requires a person to notify CDFW for any activity that will: 1) substantially divert or obstruct the natural flow of a river, stream, or lake; 2) substantially change the bed, channel, or bank of a river stream or lake; or 3) use material from the bed, channel, or bank of a river, stream, or lake. Examples of activities that require notification include diverting water from a river, stream, or lake for domestic use or irrigation and, as in this case, impounding water in an on-stream reservoir. CDFW recommends that the Project proponent notify CDFW by submitting an LSA Notification include Attachment C for the diversion of water, so that CDFW can determine if an LSA Agreement is necessary. An LSA Agreement for diversions of water typically include, but are not limited to, measures pertaining to season of diversion, minimum bypass flows, and invasive species management (e.g. bullfrog control). Procedures for submitting an LSA Notification can be found on our website:

<https://wildlife.ca.gov/Conservation/LSA>.

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, § 711.4; Pub. Resources Code, § 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.

CDFW appreciates the opportunity to provide comments on the draft ND for the proposed Project and is available to meet with you to further discuss our comments. If you have any questions, please contact Mr. Garrett Allen, Environmental Scientist, at (707) 428-2076 or at garrett.allen@wildlife.ca.gov; or Ms. Karen Weiss, Senior Environmental Scientist (Supervisory), at (707) 428-2090 or at karen.weiss@wildlife.ca.gov.

Sincerely,



Gregg Erickson
Regional Manager
Bay Delta Region

cc: State Clearinghouse