State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, *Governor*
CHARLTON H. BONHAM, *Director*

July 8, 2019

Sam Vandewater
County of Mendocino Planning and Building Services
860 North Bush Street
Ukiah, CA 95482

Subject: Notice of Completion of a Mitigated Negative Declaration for MS 2018-0001 (Brown), SCH#2019069030

Dear Mr. Vandewater:

On June 10, 2018, the California Department of Fish and Wildlife (CDFW) received a Notice of Completion (NOC) for a Mitigated Negative Declaration (MND) regarding the Minor Subdivision MS 2018-0001 (Project). The County of Mendocino (County) is the Lead Agency for this Project pursuant to the California Environmental Quality Act (CEQA).

As a Trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary to sustain their populations. As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as a Trustee and Responsible Agency under CEQA, California Public Resources Code section 21000 et seq.).

CDFW has three principal concerns with this MND:

1. The MND's impact analysis determinations are informed only by a cursory biological assessment of conditions at the Project site. Botanical surveys for rare plants and Sensitive Natural Communities (SNC) were not conducted. Only preliminary biological scoping resulting in a *"Preliminary Biological Scoping Letter"* was conducted, which were not intended to follow standard CDFW botanical survey guidance.

2. The building envelope and 50-foot buffer mitigations for rare plants, wetlands, and SNCs lack sufficient detail or feasibly enforceable conditions, and the buffers are too narrow to effectively mitigate impacts to less than significant.

3. The MND does not adequately analyze stormwater, altered hydrology, and disturbance impacts to onsite and adjacent wetland and SNC habitats.

Therefore, CDFW disagrees with the MND's significance determinations and finds the proposed mitigations and conditions of approval will not be effective in reducing impacts to a less than significant level. CDFW recommends the County not approve the Project as proposed. If the County were to approve the Project, CDFW recommends the County revise the MND with the results of botanical surveys and a revised analysis of environmental impacts, and CDFW is consulted on feasible and effective mitigations. If the revision is substantial, or there may be a significant impact, the MND should be recirculated or an environmental impact report (EIR) prepared (see CEQA Guidelines § 15073.5)

Project Description

The Project is a minor subdivision request to subdivide an existing parcel of approximately 10 acres into three parcels of approximately 2 acres, 2 acres, and 6 acres. Prior to applying for the subdivision, the Project applicant cleared and graded the property, removed rare plants and Mendocino cypress woodland (MCW) habitat, a SNC, and impacted wetlands. The installation of Project infrastructure without permits resulted in the County issuing code violations to the applicant. However, CDFW understands the violations were resolved through the applicant applying for the required permits within 30 days. No fines or penalties were levied by the County to disincentive this or other project proponents from conducting Project activities without permits or before CEQA review.

The parcel east of the Project parcel supports several SNCs, including a sphagnum fen and MCW. Parcels surrounding the Project site are dominated by MCW, much of which is severely degraded by development. MCW is a SNC with a global rank of G1, and State rank of S1, signifying it is rare and threatened both globally and statewide. As a SNC, potential Project impacts to MCW must be evaluated during CEQA project review pursuant to CEQA Appendix G, Section IV.

Consultation History

CDFW provided early consultation and recommendations to the County on this Project in a March 25, 2019 letter (Attachment 1). The substantial evidence and more detailed background information to support CDFW's environmental concerns for the Project and the adequacy of the MND is found in Attachment 1. None of the recommendations made in our March consultation letter were incorporated into the MND.

In our March consultation letter, CDFW summarized six previous CDFW letters regarding continuing development-related loss and degradation of MCW, wetlands, and other SNCs outside the Coastal Zone, bringing attention to the fact the County has no effective ordinance, regulation, or land-use code that effectively implements or enforces the conservation policies in the County General Plan.

Scoping and Buffers

The MND references the Preliminary Scoping Letter as a principal means of assessing the presence, abundance, and distribution of rare plants and SNCs at the Project site (Wynn Coastal Planning 2018). However, this Preliminary Scoping Letter was intended only as a preliminary investigation and as a means of providing counsel to the Project proponent. It was based on a single site visit in July 2018, and was not intended to nor does it meet professional botanical survey standards found in CDFW's guidance document *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). However, this Preliminary Scoping Letter does document rare plants, SNCs, and wetlands that occur extensively throughout the Project site.

The principal MND mitigation (County Staff Report Attachment O) and conditions of approval is the strategic placement of building envelopes with 50-foot development buffers intended to avoid wetlands, rare plants, and SNCs. The Project's required buffers are enforced through a note placed on the parcel map limiting development to mapped building envelopes. Other mitigations include native plant revegetation of cleared areas and restrictions on tree and vegetation removal unless there are safety or disease concerns documented by a certified arborist or registered professional forester. CDFW has two substantial concerns that these mitigations will be ineffective in meeting their primary conservation objectives: (1) the buffers are not wide enough, and (2) the allowable uses both within and outside the buffers are not defined and will have little likelihood of being enforced.

CDFW's March 25 letter (Attachment 1) includes substantial evidence why 50-foot buffers are typically not effective at minimizing impacts from adjacent development and why minimum buffers of 100 feet or wider were recommended by CDFW for this Project. Beyond the buffer width analysis included in Attachment 1, and found in CDFW (2014), the heightened concern for fire-safe buffers around structures is another compelling reason why 50-foot development buffers are problematic. CAL FIRE recommends, and insurance companies increasingly require, 100-foot fire-safe buffers around structures. Thus, future homeowners in this subdivision will immediately have justification and perhaps an obligation to remove or minimize native vegetation within 100 feet of structures.

Except for the conditions for vegetation clearing and planting, the MND does not include a prescriptive definition of land uses allowed or prohibited within the 50-foot protective buffers or within the rare plant, wetland, and SNC habitats. Curtilage, the land immediately adjacent to a home, typically includes a wide array of expected uses and land disturbance, including resident and guest parking, recreational vehicle and boat storage, ancillary structures such as garden and storage sheds, kennels, chicken coops, children's play equipment, compost and brush piles, etc. All of these activities

whether inside the 50-foot buffer or in areas intended for protection are highly likely to degrade and replace the rare plant populations and wetlands on the Project site.

MND Exhibit A, *"Conditions of Approval,"* states conditions of approval and mitigation measures are indicated by *"**"*. Exhibit A, *"Conditions of Approval,"* Condition 9, which states, *"Native vegetation shall be reestablished in all areas of disturbed soil outside of the building envelopes,"* does not have the *"**"* designation. Thus, although Condition 9 is listed in Conditions of Approval and Mitigation Measures, the MND does not stipulate Condition 9 as a condition of approval or a mitigation measure. Thus, revegetating the Project site appears to be voluntary and unenforceable.

Furthermore, Condition 9 does not define native vegetation, i.e., would the planting of only one or two herbaceous species be considered native vegetation? Further, the MND does not define *"native,"* i.e., is the vegetation native to the Project site, to Mendocino County, California, or western North America? The MND does not require replanting with the MCW species, or the broad assortment of trees, shrubs, and herbs that were cleared from the Project site prior to permit submittal. The MND's replanting condition does not include success criteria or monitoring requirements. CDFW can find no requirement or feasible and effective means to ensure that the revegetation will be implemented or that the revegetation will persist after five years (typical standard for revegetation success). The MND also does not include enforcement measures or consequences for the future parcel owners if the replanting fails, is invaded by exotic species, or is intentionally replaced by lawns or ornamental species.

Based on the above, and given the typical ways that homeowners use their yards, CDFW finds the MND's conditions of approval and mitigations for wetlands and rare plants are unenforceable, ineffective, and unlikely to succeed. Thus, the Project has a high likelihood of further degrading or ultimately eliminating the wetland and rare plant populations on the Project site.

California Sedge

The California sedge (*Carex californica*) is present within or immediately adjacent to all the identified building envelopes. The California sedge has a State Heritage Rank of S2, defined as *"imperiled in the state because of rarity due to very restricted range, very few populations, steep declines, or other factors making it vulnerable to extirpation from the state."*

The California sedge has a California Rare Plant Rank of 2B.3. This ranking (2B) is defined as *"rare or endangered in California, but more common elsewhere."* This plant, as indicated in the MND, has a Threat Code extension of (.3), signifying that it is *"not very threatened in California, with less than 20% of occurrences being threatened/low degree and immediacy of threat"* (CNDDB 2019). Based upon this Threat Code, the perceived adequacy of the building envelopes and buffers, and restrictions on

vegetation removal, the MND determined the impacts to the California sedge are less than significant.

In addition to the buffer and vegetation removal condition concerns discussed above, CDFW has substantial evidence the California sedge should have a higher threat level than (.3) due to the on-going and extensive degradation and removal of its primary California habitat: MCW. According to Keeler-Wolf (2019), between 20-44 percent of MCW and related SNCs have been lost to development in the past 150 years. CDFW has recently submitted data to the California Native Plant Society that demonstrates a higher threat level is warranted and requests that its Threat Code be reevaluated. For these reasons, CDFW recommends the MND treat impacts on the California sedge as potentially significant and propose mitigations.

Altered Hydrology and Stormwater Runoff

The MND does not analyze the Project's altered hydrology and water quality impacts to onsite and directly adjacent offsite SNCs and wetlands. CDFW's March 25 letter (Attachment 1, page 3, and Recommendation (a)), describes a sphagnum fen and intact MCW adjacent to this Project, and provides substantial evidence of known stormwater and nutrient impacts to these habitat types from adjacent development runoff.

Recommendations

1. The County should not approve the Project as proposed.

2. The MND should be revised to address the issues raised in this letter. The MND should include the results of botanical surveys, a revised analysis of environmental impacts, and the results of CDFW consultation on feasible and effective mitigations. If the revision is substantial, or there may be a significant impact, the MND should be recirculated or an EIR prepared (see CEQA Guidelines § 15073.5).

3. CDFW and County staff should meet to discuss the issues raised in this letter and work to develop effective long-term solutions to the continued loss and degradation of MCW habitats.

As a Trustee Agency, CDFW remains concerned about the continuing and unabated loss and degradation of MCW and wetlands outside of the Coastal Zone. Despite strong conservation policies in the County 2008 General Plan Update, the County does not have an effective land use or zoning overlay, regulation, or ordinance to prevent or mitigate the loss of MCW and other SNC from development or conversion outside of the Coastal Zone.

As stated in our March 2019 letter, if effective conservation measures are not developed, CDFW is likely to find that future projects resulting in the loss or degradation of MCW has cumulatively considerable impacts.

Thank you for the opportunity to comment on this MND. As offered in our March 2019 letter, CDFW staff look forward to meeting with County planning staff and policy makers to address the contents of this letter in greater depth. Given the complexity of this Project and the broader concerns over the conservation of SNCs in coastal Mendocino County, CDFW strongly recommends a face-to-face meeting between CDFW and County staff as an effective means to begin addressing the issues raised in this letter. If you have questions on this matter or would like to schedule a meeting to discuss these recommendations, please contact Senior Environmental Scientist (Supervisor) Gordon Leppig at (707) 441-2062 or by e-mail at gordon.leppig@wildlife.ca.gov.

Sincerely,

Curt Babcock
Habitat Conservation Program Manager

Attachment

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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

March 25, 2019

Brent Schultz, Director
Mendocino County Planning and Building Services
860 N. Bush St.
Ukiah, CA 95482

Subject: Minor Subdivision MS 2018-0001 (Scott Brown) at 31120 Thomas Lane, Mendocino County

Dear Mr. Schultz:

On July 8, 2018, California Department of Fish and Wildlife (CDFW) received a referral for a minor subdivision application (MS 2018-0001) for APN 019-333-19 (Project), submitted by Scott Brown (Applicant). The Project proposes the subdivision of a 10.3-acre parcel into three parcels of 2.0, 2.0, and 6.3 acres.

CDFW has substantial concerns that this Project will result in significant impacts to Mendocino Cypress Woodland Alliance (MCW), which is a Sensitive Natural Community (vegetation type). Furthermore, this Project is representative of the broader threat of development and vegetation clearing resulting in on-going and continued loss of MCW in Mendocino County (County) outside the Coastal Zone. This Project demonstrates that despite strong conservation policies in the County 2008 General Plan Update, the County continues to have no effective land use or zoning overlay, regulation, or ordinance to prevent or mitigate the loss of MCW and other Sensitive Natural Communities from development or conversion outside of the Coastal Zone.

As a Trustee for the State's fish and wildlife resources, CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and the habitat necessary to sustain their populations. As a Responsible Agency, CDFW administers the California Endangered Species Act (CESA) and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. CDFW offers the following comments and recommendations in our role as a Trustee and Responsible Agency under the California Environmental Quality Act (CEQA; California Public Resource Code § 21000 et seq.).

Project History

Prior to receiving the Project referral, CDFW provided comments to Mendocino County Planning staff on June 18, 2018, which noted the likelihood of wetlands and rare plants on this parcel and recommended both a wetland delineation and a rare plant survey be completed. At that time, both the County and CDFW were unaware the Applicant had

already cleared approximately 90 percent of the parcel vegetation prior to submitting the Project application (see Table 1 for Project timeline and agency involvement).

Table 1: Parcel History and Agency Involvement

May 7, 2017	Aerial imagery shows the parcel approximately 90% forested
May 10, 2017	Parcel purchased by Applicant
October 27, 2017	Aerial imagery shows the parcel cleared, 10% remaining forested
January 4, 2018	Applicant files application for minor subdivision
June 8, 2018	County refers MS 2018-001 to CDFW for comment
June 18, 2018	CDFW provides informal comment requesting a wetland delineation and floristic surveys; CDFW was unaware that the parcel has been cleared
September 5, 2018	County contacts CDFW regarding unpermitted clearing and grading at parcel
September 10, 2018	County issues Notice of Violation to Applicant for trailers, shipping container, solar panels, water lines, and grading. Resolution of this Notice of Violation will be the application for these permits
September 14, 2018	Preliminary biological scoping cites presence of rare plants and suggests presence of wetlands
December 4, 2018	Interagency site visit to parcel
December 5, 2018	North Coast Regional Water Quality Board (NCRWQB) requests wetland delineation be submitted within 60 days
December 17, 2018	County informs CDFW that they will consider the Application once a wetland delineation is completed
February 7, 2019	Applicant provides wetland delineation that depicts a large wetland in the northeast corner of the parcel and a small wetland on the southern edge

Current vegetation mapping identifies this parcel and adjacent parcels as dominated by MCW, a Sensitive Natural Community with a global rank of G1 and State rank of S1, signifying it is rare and threatened both globally and statewide. As a Sensitive Natural Community, potential Project impacts to MCW must be evaluated during CEQA review pursuant to CEQA Appendix G, Section IV.

Sensitive Natural Resources and Potential Impacts

Mendocino Cypress Woodland, previously known as Mendocino Pygmy Cypress Woodland, has been designated a Sensitive Natural Community for at least 10 years (Sawyer et al. 2009). In 2018, CDFW's Vegetation Classification and Mapping Program

(VegCAMP) completed a three-year vegetation analysis and mapping study of MCW and related natural communities on nutrient-poor (oligotrophic) soils on Mendocino County and northern Sonoma County coastal terraces. The study classified eight natural community associations. Due to their rarity and restricted range, all eight associations are designated as Sensitive Natural Communities.

Mendocino Cypress Woodland, dominated by Mendocino cypress (*Hesperocyparis pygmaea*) and Bolander pine (*Pinus contorta* spp. *bolanderi*) only occurs in Mendocino County between Pudding Creek and the Navarro River, and with approximately 4,950 acres remaining, it is among the rarest of natural communities in the world (Keeler-Wolf et al. 2019). Mendocino Cypress Woodland is often considered to be a wetland based on hydrology (perched water table), the presence of poorly drained, shallow soils with underlying hardpan, and the dominance of wetland plants.

The parcel directly east of the Project site contains Sholars Bog, a rare sphagnum fen wetland habitat surrounded by intact MCW. Land clearing, ditching, and septic systems result in altered hydrology and increased nutrient inputs, which have been identified as threats that can substantially degrade wetland and MCW habitat values (CDFW 2014, Keeler-Wolf et al. 2019). The residential development resulting from this Project, including installation of drainage ditches and septic systems and impervious surfaces such as structures and driveways, and additional vegetation clearing, will further directly impact onsite and adjacent MCW and wetlands, including Sholars Bog.

The biological scoping report identified four rare plant species on the Project parcel, including Mendocino cypress (State Heritage Rank S1), Bolander Pine (State Heritage Rank S2), California sedge (*Carex californica,* State Heritage Rank S2), and hair-leaved rush (*Juncus supiniformis*, State Heritage Rank S1). According to the California Natural Diversity Database, plants with a State Heritage Rank of S1 are critically imperiled and plants designated the S2 Rank are imperiled. Thus, the Project appears highly likely to directly impact several rare plant populations. To assess the potential presence of additional rare plants and better describe the known rare plant occurrences, CDFW recommends rare plant surveys be conducted that adhere to the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018), and impacts to rare plants be analyzed in the Project's CEQA document.

During a site visit on December 5, 2018, NCRWQB requested a wetland delineation be conducted. The wetland delineation documented an approximately 0.67-acre wetland on the northeastern section of the Project site, and an approximately 850-square-foot wetland in the southern section of the Project site (Wynn Coastal Planning and Biology 2019). The wetland delineation acknowledged that the prior vegetation clearing was "problematic," and confounded conducting an accurate delineation. Clearly a wetland delineation should have been conducted prior to the Project proponent clearing the vegetation and draining the site with extensive drainage ditches.

CDFW recommends this Project's CEQA document include an analysis of the Project's potential impact to both onsite and adjacent wetland habitat. This impact analysis should include an assessment of appropriate wetland development setbacks (buffers) or other onsite and offsite mitigation measures to prevent further wetland degradation or loss through development conversion, altered hydrology, point and nonpoint source pollution, light pollution, invasive species, etc.

In a review of wetland and riparian buffers (CDFW 2014), CDFW concludes that failure to maintain buffers connecting wetland and upland features *"will result in the creation of isolated wetland enclaves scattered throughout highly urbanized areas and result in indirect loss of wetland habitat values."* A review by the Coastal Commission showed that 30 to 59 meter-wide (100 to 195 foot-wide) buffers are generally accepted in the scientific literature as effectively protecting aquatic resources (California Coastal Commission 2007). CDFW typically recommends habitat buffer widths of at least 150 feet for streams and wetlands (CDFW 2014). Development setbacks of at least 100 feet are commonly employed to minimize indirect impacts to rare plant populations and Sensitive Natural Communities; however, the width and placement of effective and appropriate development setbacks should be site- and project-specific, and thus, should be developed in consultation with CDFW and analyzed and mapped in the Project CEQA document.

Mendocino County Protections of Wetlands and Sensitive Natural Communities

Of paramount concern to CDFW is the continued threat of development and vegetation clearing to wetlands and Sensitive Natural Communities in Mendocino County. The clearing of this 10-acre parcel prior to CEQA review and County permitting is a compelling example of the lack of deterrence or consequences for those causing significant environmental effects and subverting CEQA. It appears the County does not have sufficient enforcement authority in these situations because the County is without a land use or zoning overlay, regulation, or ordinance to prevent or mitigate the loss of wetlands and other Sensitive Natural Communities outside the Coastal Zone. The County does not have a discretionary grading permit process or adequate violation fines to dissuade or prevent individuals from removing substantial habitat without adequate environmental review and mitigation.

In the past six years, CDFW and Mendocino County Planning and Building Services staff have met numerous times to discuss the County's lack of effective environmental protections outside of the Coastal Zone. These meetings have been productive and have resulted in minor changes to the County's permit review process in inland areas, elevating some ministerial projects to discretionary projects. Currently, County permitting of clearing and grading activities is a ministerial action, which does not include environmental review.

CDFW remains concerned Mendocino County may be years out from developing effective Sensitive Natural Community conservation measures. Approximately 70 percent of MCW is located outside the Coastal Zone (Keeler-Wolf et al. 2019), where much development is ministerial and extensive land clearing receives little environmental review or oversight. As indicated by CDFW's CEQA comment letters on this topic (Table 2), the decline of Sensitive Natural Communities such as MCW and Northern Bishop Pine Forest Alliance is a significant and on-going issue, which, without imminent solutions, will continue unabated.

Table 2: CDFW Letters to Mendocino County, Joint Powers Authorities and Special Districts on the Conservation Value and Threats to Wetlands, MCW, and other Sensitive Natural Communities.

January 2006	CDFW letter to Mendocino Coast Parks and Recreation District regarding the draft EIR for Golf Course
November 2008	CDFW letter to Mendocino County on General Plan Update recommending County adopt a grading ordinance
February 2014	CDFW letter to Caspar Joint Powers Authority regarding Notice of Preparation for Central Coast Transfer Station
March 2015	CDFW letter to Caspar Joint Powers Authority regarding draft EIR for Central Coast Transfer Station
September 2015	CDFW letter to Mendocino County Planning and Building Services regarding the need for conservation of MCW
March 2018	CDFW letter to Mendocino Coast Parks and Recreation District regarding Notice of Preparation for Fort Bragg OHV Park

In the September 14, 2015 letter, for instance, CDFW reminded Mendocino County that residential development and land use activities are the major threats to the continued existence of MCW and pointed out policies within the Mendocino County General Plan that provide conservation guidelines for MCW. This 2015 letter cited Mendocino County General Plan Resource Management Policy RM-84:

> *"Protect "pygmy" ecosystems ("pygmy" and "transitional pygmy" vegetation and soils) through the use of measures that include minimizing:*
> - *Vegetation removal,*
> - *Disruption of vegetation community, and*
> - *The introduction of water and nutrients due to human activity, sewage disposal systems, animals or agricultural uses.*

> *Also:*
> - *Limit subdivision of land on agricultural lands adjacent to "pygmy" ecosystems, and*
> - *Promote best management practices to minimize impacts"*

This 2015 letter cited the lack of a grading ordinance in Mendocino County and how this hinders the County's ability to implement its General Plan policies and protection of MCW and other Sensitive Natural Communities.

The 2015 CDFW letter also stated that impacts from future projects could be found to be cumulatively considerable as defined in CEQA section 15065 and would potentially require an Environmental Impact Report for future projects impacting these habitats. CEQA section 15065(a)(3) describes cumulative impacts occurring when:

> *"The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."*

CDFW continues to be concerned that the cumulative impacts of development within and adjacent to MCW and other Sensitive Natural Communities remains a continuous threat to these habitats, and thus necessitates cumulative impact analyses in CEQA documents for projects impacting these habitats, such as this Project.

Recommendations

1. Mendocino County should consult with CDFW and file an appropriate CEQA document with the State Clearinghouse for public and agency review and comment. This CEQA document should include:

    a. An analysis of impacts to onsite and adjacent MCW, wetlands, and rare plant populations.
    b. The results of rare plant surveys conforming to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018) and the results of the wetland delineation on the Project site.
    c. Effective avoidance, minimization, and mitigation measures that address both cumulative and Project-specific significant impacts to resources on this and neighboring parcels resulting from further development and subdivision of this parcel.

2. Mendocino County should evaluate an array of effective riparian, wetland, and Sensitive Natural Community conservation strategies, such as a land use or zoning overlay, changes in building code, and grading permit changes or ordinances, consult with CDFW, and take the required steps to implement one or more effective conservation strategies.

Thank you for the opportunity to comment on this permit application. CDFW staff are available to meet with Mendocino County Planning staff to consult with or address the contents of this letter in greater depth. If you have questions on this matter or would like to discuss these recommendations, please contact Environmental Scientist Daniel Harrington at (707) 456-0335 or by e-mail at daniel.harrington@wildlife.ca.gov.

Sincerely,

Curt Babcock
Habitat Conservation Program Manager

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