



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
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In Reply Refer to:
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December 1, 2023
Sent Electronically

Lily Lee
Manager, Infrastructure Section
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

Attention: Jillian Bletz and Cedric Irving

Subject: Amendment to the Biological Opinion for the Proposed Sterling Natural Resource Center, San Bernardino, California

Dear Lily Lee:

The U.S. Fish and Wildlife Service (Service) issued a biological opinion (FWS-SB-16B0182-17F0387) to the Environmental Protection Agency (EPA) for the Proposed Sterling Natural Resource Center (Project) on March 9, 2017, addressing impacts to the federally endangered San Bernardino kangaroo rat (*Dipodomys merriami parvus*; SBKR) and the federally threatened Santa Ana sucker (*Catostomus santaanae*; sucker) and their respective designated critical habitats. On August 1, 2023, we received an email from the EPA requesting reinitiation of consultation based on proposed changes to the Project Description related to Santa Ana sucker conservation measures. The East Valley Water District (EVWD) has proposed the changes to provide them flexibility in implementing sucker conservation measures and to achieve their stated objectives. This amendment addresses the proposed changes to the conservation measures for sucker. On November 14, 2023, we received an updated Supplemental Biological Assessment from EVWD which contained the final changes to the Project Description.

The conservation measures and their changes are provided below. There are no proposed changes to the Project's scope as it relates to our previous biological opinion on this project (FWS-SB-16B0182-17F0387-R002). This document was prepared in accordance with section 7 of the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*).

In our biological opinion (FWS-SB-16B0182-17F0387) we concluded that the permanent loss of designated sucker critical habitat would be offset by the creation and maintenance of habitat nodes and cooling of summer water temperatures in the Rialto Channel. Thus, the ecological function and values of designated critical habitat would be maintained in this critical habitat unit and within sucker designated critical habitat overall. We also concluded that the Project would

offset its displacement of sucker and support the range-wide conservation (recovery) of sucker through enhancement of Santa Ana River aquatic and riparian habitats, reintroduction to portions of its historic range, and long-term management of existing and new populations. In the following paragraphs we list the proposed changes to the project conservation measures and subsequently we discuss why they do not affect sucker in a way that was not considered in our biological opinion (FWS-SB-16B0182-17F0387). A complete list of the conservation measures is provided in Appendix D.

Revised Conservation Measures

Changes are indicated in double underline and ~~strikethrough text~~.

Santa Ana Sucker

- SAS 21. The following measures will avoid, minimize, and offset Project-related impacts to SAS associated with up to 1.21 acres of permanent degradation of occupied designated critical habitat in the mainstem of the Santa Ana River from the RIX outfall downstream to approximately Mission Boulevard.
- a. Valley District will prepare and implement the HMMP which will identify habitat improvement actions and methods for implementation, monitoring, and maintenance. The diversion of wastewater flow from the RIX Facility to the SNRC will not occur until Valley District's Santa Ana Sucker HMMP has been approved by the USFWS and the actions proposed in this measure have been completed or show evidence of significant progress toward successful implementation such as engineering design(s) and/or other regulatory compliance such as the California Environmental Quality Act, or consultation with the USFWS will be reinitiated.
 - b. The HMMP will include the measures listed below to offset direct and indirect impacts to SAS and its habitat resulting from the loss of up to 22.3 percent (6.43 MGD of 28.4 MGD calculated from the November 2014 to May 2016 discharge) discharge from the RIX outfall into the Santa Ana River. The HMMP will contain measures to increase the number of individual SAS in the Santa Ana River, increase the area of suitable and occupied habitat in this watershed, and establish two new populations in the watershed. It will be implemented by a contracted, qualified, and permitted entity in coordination with the USFWS. The HMMP will specify goals and performance criteria for each conservation measure and include the following elements:
 - i. Habitat Node Creation (microhabitat enhancements) to offset the potential reduction of suitable habitat available to sucker, including the above listed habitat features, resulting from decreased flow, decreased water velocity, and decreased sand transport.

Objective: Increase the total area of suitable habitat available to sucker, including riffles, small scour pools, and exposed patches of gravel/cobble substrate by strategically placing a series of structures within the stream flow to manipulate water movement and create these microhabitat areas.

This measure is expected to enhance perennial stream habitat within at least 1.5 acres of occupied habitat along about 2.5 miles of river, as measured in the fall by the area of pools created, gravel/cobble substrates exposed, and other functional SAS habitat features created/enhanced. The creation of a minimum of at least 6 habitat nodes will occur prior to any water diversions. An additional 0.5 acre of microhabitat enhancements (total of 2.0 acres) will be maintained temporally during dry rainfall years (<14.7 inches¹) until Upper Watershed Population Establishment has occurred (see Conservation Measure 21.b.v).

If future data suggests that impacts to the species are either greater than expected or habitat nodes cannot be created to functionally offset Project impacts, the Project will obtain technical assistance from the USFWS to develop a new or revised CM that will achieve the biological objective(s) as analyzed in this opinion, or consultation with the USFWS will be reinitiated.

The Project will implement microhabitat enhancements (habitat nodes) within ecologically valuable segments of the Santa Ana River downstream of the RIX discharge location (subject to landowner access permissions) to improve the abundance and distribution of the above-mentioned SAS habitat features. Enhancements will include the use of natural materials to increase scour and pool formation. Substrate augmentation (e.g., river gravel and cobble) may also occur in the same area to enhance perennial stream habitat function. Examples may include placement of large boulders and/or large woody debris to increase velocity of flow and gravel bar patches as well as deep pool refugia areas. A minimum of six habitat nodes will be created.

One naturally occurring riffle/pool feature (natural node) in the Santa Ana River was observed to enhance the stream habitat for SAS for approximately 330 feet (100 meters, 0.25 acres). Between 2015 and 2016 the USGS Native Fishes Survey found that the relative abundance of exposed gravels increased in this area suggesting that the size of the affected area associated with the node is subject to fluctuate based upon environmental conditions and the abundance of fine sediment in

¹ Measured in San Bernardino, California

the inset channel (SAS occupied stream) (Brown and May 2016, 2017). Although all nodes will be unique in design, each will serve to replicate the scale and provide similar ecological functions as the natural node discussed above.

The nodes will be located in the Santa Ana River mainstem between the RIX outfall and River Road Bridge. To maximize habitat value and function locations should be associated with mainstem tributaries (~~Evan's Lake~~, Arroyo Tequesquite, Sunnyslope Drain, Anza Drain, Hole Creek, etc.). Locations will need to be further refined by field survey data.

Habitat nodes will be monitored annually, and the survey data will be used to assess the need for corrective measures. Annual monitoring will include, at minimum, water quality, visual estimates of substrate cover types, and fish surveys. When the cumulative cover of boulder, cobble, and gravel is found to be less than 35 percent for any habitat node (mean cover measured over a 0.25-acre reach associated with a node), maintenance and/or reinstallation of nodes will be conducted to maintain a minimum of 0.25 acres of habitat enhancement for every node or a cumulative enhancement of 1.5 acres for all ~~six~~ nodes. An additional 0.5 acre (total of 2.0 acres) will be enhanced during dry rainfall years (<14.7 inches) until Upper Watershed Population Establishment has occurred (see Conservation Measure 21.b.v). All work conducted in the Santa Ana River will be done in coordination with the USFWS and CDFW.

If vegetation removal is required for ingress, egress, or other work areas associated with Habitat Node creation and maintenance it will be revegetated. Quantitative and qualitative performance standards addressing vegetation cover and diversity will be included in the HMMP. Within 3 and at most 5 years after commencing revegetation efforts, cover and diversity should have progressed toward pre-Project levels of cover and diversity, or higher quality for the benefit of vireo and SAS. It is not anticipated that maintenance work, requiring vegetation removal, will be needed more frequently than every 5 years.

- ii. Aquatic Predator Control Program to offset the potential increase in non-native predator habitat (pools or other microhabitats that provide relatively deep and slow velocity water flow) resulting from reduced discharge volume.

Objective: Reduce the abundance of non-native predators in the reach of river affected by the Project so as to maximize native fish survival. The non-native predator removal program will be focused on reducing

the abundance of non-native aquatic predators immediately preceding the start of the sucker spawning season (approximately March 1). Species to be removed may include non-native fish, amphibians, and reptiles such as mosquitofish, largemouth bass, black bullhead catfish, green sunfish, red-eared slider, African clawed frog, and American bullfrog. This activity will occur at minimum of two ~~one~~ times per year outside of the SAS spawning season (August 1 to February 28) until Upper Watershed Population Establishment has occurred (see Conservation Measure 21.b.v), at which point the effort will be reduced to a minimum of one time per year. The most recent fish and/or other surveys conducted upstream of Prado Basin in the Santa Ana River will provide the locations of where to conduct electroshocking. Electroshocking will be carried out by a USFWS-approved SAS biologist authorized to use electroshock sampling methods. Pre-spawning predator removal will occur annually prior to February 15 between Rialto Channel downstream to Van Buren Boulevard (or elsewhere along the mainstem Santa Ana River if determined beneficial to the species), focusing on ~~in~~ areas of highest ecological value to SAS reproduction, currently from Rialto Channel downstream to approximately Mission Boulevard and in mainstem tributaries. If aquatic predators are found in abundance after pre-spawning predator removal, one or more ~~a second~~ predator removals will be conducted after August 1.

- iii. Exotic Weed Management Program to reduce competitive stress for native vegetation within the riparian community in order to offset the impacts associated with reduced water availability resulting from the Project.

Objective: Maintain a low abundance and cover of non-native vegetation along the Santa Ana River ~~and in City Creek~~ within the Project impact area (RIX outlet to Mission Boulevard, or as otherwise approved by the USFWS and Boulder Avenue to Alabama Street, respectively), focusing on the removal of giant reed, tamarisk, and castor bean.

The exotic weed management program will be carried out by a qualified and experienced entity and will focus on controlling the non-native vegetation within the riparian corridor between the Rialto Channel and the Mission Boulevard Bridge (approximately 4.2 miles) or, depending on landowner permissions, along a similar length of river downstream of the Riverside County-San Bernardino County line (for example, Market Street Bridge downstream to Anza Creek, approximately 4.2 miles). This measure will establish and maintain weed control in one-third of the area (approximately 1.4 miles) per year, so as to

complete the weeding of the entire area once every 3 years. Annual work plan meetings between the USFWS, Valley District staff, and contractor will identify areas of concern and focus work efforts on those areas. A successful program will maintain total cover of non-native riparian species to less than 25 percent and total cover of giant reed, tamarisk, and castor bean to less than 5 percent. Percent cover will be assessed relative the total area of the weeded riparian corridor for that year. Although they are native species, cattails (*Typha* spp.) and bulrush (*Schoenoplectus* spp.) may increase in abundance over time as their preferred habitat type (slow, shallow water or marsh) is expected to increase due to Project reductions of flow. These plant species may degrade sucker habitat by further reducing water velocity and trapping fine sediment. Problem areas will be identified as part of the Riverwalk survey (see below for more on Riverwalk survey) and if certain areas have become problematic, they will be managed in coordination with the USFWS and CDFW.

- SAS 4. High Flow Pulse Events². The HMMP will identify means to create high flow pulse events as needed based on substrate conditions, up to 2 times per year. The high flow pulse events would be designed to flush out fine sediment from the upstream reach of the affected river segment and would be implemented through a cooperative agreement with the City of San Bernardino Municipal Water Department and/or the City of Rialto.
- iv. Rialto Channel and/or Santa Ana River Water Temperature Management: Commit funding to contribute towards implementation of a water temperature amelioration strategy/measure (project) within Rialto Channel and/or the Santa Ana River to offset the potential loss of suitable habitat downstream in the Project impact area during times of the year when habitat will be most affected from the cumulative impacts from reduced discharge and drought effects, particularly in summer and fall. Proposed measures/strategies to reduce water temperature will be developed following completion of a larger-scale water temperature monitoring study (to be completed by the Upper Santa Ana River HCP applicants). Financial commitment will be outlined in the HMMP and reviewed and approved by the USFWS.

² SAS 4 is stipulated in East Valley Water District's Environmental Impact Report for this Project, and the Service has kept the numbering of this conservation measure consistent with that document. This measure was formerly a Conservation Recommendation.

Objective: Reduce water temperatures in Rialto Channel and/or the Santa Ana River to tolerable levels (less than 86 degrees Fahrenheit) during summer months. Commit funding to contribute towards implementation of a proposed measure/strategy (project) to ameliorate Rialto Channel and/or Santa Ana River water temperatures.

In recent years the temperatures within the natural bottom reach of Rialto Channel (not concrete lined section) were found to be generally greater than 80 degrees Fahrenheit in summer and fall (USGS 2015) and often warm enough to be outside of the tolerable range for sucker (USFWS 2010b). Areas of elevated water temperature have also been recorded in the Santa Ana River. A potential strategy In order to decrease the water temperature in Rialto Channel and/or the Santa Ana River to tolerable levels for SAS is to add supplemental flow from relatively cool groundwater (67–70 degrees Fahrenheit, temperature range derived from local nearby well operators), from up to 4 wells or other water sources will be added to the flows in Rialto channel.

In order to implement this measure most effectively, To inform potential solutions to elevated water temperatures in Rialto Channel and the Santa Ana River, a water temperature study has been initiated by the Upper Santa Ana River HCP applicants. Results of these studies will be used to facilitate development of methodologies/strategies to ameliorate elevated water temperatures. Funds set aside in accordance with this measure will be used to implement future recommended methodologies/strategies generated by the water temperature studies (as approved by the USFWS). two water quality monitoring stations will be established in Rialto Channel. An upstream, real-time gage will measure the water temperature at the well input location (plunge pool downstream of Agua Mansa Bridge). At 85 degrees Fahrenheit the groundwater wells will automatically turn on and release directly into the plunge pool. Another real-time gage will be installed downstream of the plunge pool Rialto Channel just before the confluence with the Santa Ana River and. Once the water temperature at this downstream gage is less than 82 degrees Fahrenheit the well input will be turned off. Initiation and cessation of well water input (discharge) will be phased over a period of time to reduce sudden changes in flow and temperature in Rialto Channel. The well input and controls will be constructed and tested prior to

~~diversion of flows from the RIX facility to the SNRC. This program will be deemed successful if there are 5 or fewer days between June 22 and September 21 that the daily maximum water temperature exceeds 82 degrees Fahrenheit and SAS are present in the channel during the same period. Water temperature will be measured in Rialto Channel upstream of the RIX outfall. If success criteria are not met within 2 years of signing the biological opinion, the Project will obtain technical assistance from the USFWS to develop a new or revised CM that will achieve the biological objective(s) as analyzed in this opinion.~~

- v. Upper Watershed SAS Population Establishment to offset potential losses of suitable habitat in the Project's impact area, and to offset unknown and/or cumulative impacts to the species and its habitat that may be associated with the reduction of flow to the Santa Ana River.

Objective: Increase the abundance, distribution, and resilience of the sucker population in the Santa Ana River Watershed by establishing redundant populations in upper watershed tributaries.

Subject to the availability of sufficient source fish, the Project will establish two new locations of sucker within City Creek and Hemlock Creek, or another suitable unoccupied locations within the former range of the species within the Santa Ana River watershed as approved by the USFWS. Both City and Hemlock creeks have been analyzed as part of the Santa Ana Sucker Translocation Plan (Dudek 2016a, 2017). Valley District has assessed the habitat availability and appropriateness for SAS in City and Hemlock creeks (Dudek 2016b). These documents show that elements (PCEs) to support SAS, as well as additional factors found to be important to SAS (Aspen 2016). The Translocation Plan is currently under review by the USFWS, the CDFW, and the U.S. Forest Service (USFS).

~~Prior to Project flow reduction to the Santa Ana River, at least one translocation of SAS will have occurred and Valley District will provide data indicating that the nascent population is healthy, reproducing, and appears to be successfully establishing. Successful establishment of SAS will have occurred when there are surviving and reproducing fish in at least two size classes, the population of SAS is~~

~~stable or increasing in population as averaged over 5 years, and the translocated population is distributed throughout the appropriate habitat in the translocation stream.~~

If progress towards achievement of success criteria is not demonstrated within ~~are not met in both translocation tributaries within 5 years of initial translocation, or has not been met within 10 years of translocation,~~ signing the biological opinion, the Project will obtain technical assistance from the USFWS to develop a new or revised CM that will achieve the biological objective(s) as analyzed in this opinion.

The HMMP will identify and further detail the goals and success criteria of SAS re-establishment. A financial security deposit, in an amount approved by USFWS and CDFW, will be established prior to Project flow reduction to the Santa Ana River, to provide assurances that the translocations will be implemented and monitored to demonstrate achievement of success criteria (progress towards achievement of success criteria demonstrated within 5 years of translocation, or met within 10 years of translocation). The HMMP will also describe ~~and include~~ the amount of financial assistance to be provided by East Valley Water District for the regionally beneficial population establishment program, including additional measures found below.

- A. East Valley Water District will contract with a USFWS-approved entity that can demonstrate the ability to re-introduce ~~captively bred~~ SAS to a suitable unoccupied location with the intent of establishing a new self-sustaining population within the former range of the species on the Santa Ana River. The Contract requirements will include the following:
- (1) translocation of appropriate numbers and age classes of SAS rearing and maintaining a sufficient number of breeding adults to support re-introduction of a ~~minimum of 500 juvenile SAS~~ into the target area ~~per year (subject to approval by or alternate numbers agreed to by the USFWS);~~ (2) annual relocations for the first 3 years to supplement the population, ~~then~~ as needed to maintain a stable population size and genetic diversity; and (3) monitoring, adaptive management, and annual reporting.

- B. East Valley Water District may only reintroduce captive-bred SAS if ~~(1) captive breeding, and all associated permitting and~~ documentation has been approved by the USFWS and CDFW ~~and (2) the captive breeding facility has adequate numbers of appropriate sized SAS. If these conditions are not met or if additional fish are needed for translocation purposes SAS may be translocated from the Santa Ana River to the west fork of City Creek and one other historic tributary in the Santa Ana River watershed.~~
- C. If, at any time, SAS are found located downstream Highland Avenue Bridge, East Valley Water District will be responsible for relocating all SAS back upstream within the boundaries of the San Bernardino National Forest or out of locations that where their presence might affect other entities who do not have incidental take exemptions for this species. This measure will be implemented for the life of the Project or until another entity, such as the HCP, takes over this responsibility.

Discussion

Conservation measure SAS 21.b.i. will be modified to give EVWD flexibility in enhancement area to account for landowner access permissions and increase the area of habitat enhanced/maintained for sucker. This measure now includes a minimum of 6 habitat nodes and an additional 0.5 acre of habitat will be enhanced during low rainfall years, resulting in more benefits to sucker than the original conservation measure. We have already analyzed the effects of habitat node creation on sucker and its designated critical habitat, and the proposed changes to this conservation measure would continue to offset effects to sucker designated critical habitat through the creation of habitat nodes. Since it is a low impact activity, we do not expect additional adverse effects to sucker or its designated critical habitat from additional habitat node creation.

Revised conservation measure SAS 21.b.ii., aquatic predator removal, will double the number of predator removal events until conservation measure SAS 21.b.v. is implemented. This conservation measure would continue to benefit the long-term conservation management of sucker in its current range, and the doubled efforts leading up to upper watershed population is expected to result in a reduction of predation on sucker, providing an additional conservation benefit in the short-term. Moreover, the effects of recovery actions including aquatic predator removal have been addressed in our programmatic biological opinion (FWS-CFWO-14B0113-14F0171).

The changes to conservation measure SAS 21.b.iii, will allow EVWD to shift the weed management area to suit land access permissions. The length of river miles to be enhanced remains unchanged, and the revision would not reduce the conservation value of the exotic

weed management program for the Project. Since it is a low impact activity, we do not expect additional adverse effects to sucker or its designated critical habitat from the changes in the exotic weed management program.

The changes to conservation measure SAS 21.b.v., upper watershed sucker population establishment, will give EVWD flexibility in implementation timing to address downstream landowner concerns. A financial security will be established to provide assurances that translocations and achievement of success criteria will occur. Therefore, range expansion will be delayed and may represent a temporal loss of conservation value and a delay in this recovery action. However, the delay would be offset by the temporal benefits of the doubled predator control efforts and increased habitat node creation. The EVWD will establish a financial security deposit prior to diverting water and the HMMP is being finalized for approval by the Service. We do not expect additional adverse effects to sucker, or its designated critical habitat, from the delay in implementing this recovery action. Moreover, the effects of recovery actions including translocation of sucker within its historic range have been addressed in our programmatic biological opinion (FWS-CFWO-14B0113-14F0171).

The EVWD has decided to incorporate a conservation recommendation in our biological opinion (FWS-SB-16B0182-17F0387), conservation measure SAS 4, high flow pulse events. This is an additional conservation value for sucker and its designated critical habitat. This conservation measure will benefit sucker and its critical habitat by increasing the surface area of foraging and spawning habitat by exposing gravels and cobbles. EVWD has cooperated with the Service and both Rialto and the RIX treatment facilities (sometimes together, or independently) in the past to facilitate shutdowns at specific dates and times for nonnative aquatic species control efforts. The additional benefit following the predator control effort is flushing flows. The effects of this conservation measure would coincide with the planned shutdown/maintenance events of the RIX water treatment facility; therefore, the effects of this conservation measure are addressed by the RIX HCP and our biological opinion for that project.

A number of constraints have made it necessary for EVWD to revise conservation measure SAS 21.b.iv., Rialto Channel and Santa Ana River Water Temperature Study and Amelioration Management Plan. Those constraints include the lack of willing landowners to sell or lease property; the presence of Delhi Sands flower-loving fly habitat adjacent to Rialto Channel; and the close proximity to the City of San Bernardino's wastewater treatment plant and the potential for a well to interfere with their operations. New data received from the City of Rialto comparing influent and effluent water temperature from the City of Rialto's treatment plant identified that wastewater is entering the Rialto treatment plant at high temperatures. This discovery raised the question of whether it might be better to identify locations within Rialto's wastewater pipeline system where mitigation measures could be implemented to reduce temperatures prior to reaching the treatment plant.

Action to reduce water temperatures would be delayed for 3 years to investigate and recommend potential measures to ameliorate water temperatures. This change represents a temporal loss of conservation value and a delay in a recovery action. However, based on new information we no longer see the elevated water temperatures present at Rialto Channel as an obvious source of

adverse effects to sucker. Cooler water could likely benefit sucker over the long term; however, sucker have been observed this year in higher numbers in the warmer mainstem of the river and lower numbers of the cooler RIX outflow, even though the RIX outflow is accessible to sucker. Notably, since October 2022, flow from Rialto Channel has been disconnected from the mainstem of the river ever since a major storm event caused it to jump its bank. Consequently, Rialto Channel water is now separate from the RIX outflow except during high flow events such as storms or during unusually high water-years, such as the water-year 2023, when the Santa Ana River is perennially flowing from the Seven Oaks Dam. For the period that the separation persists, during high flow years, Rialto may mingle with the RIX outflow but the effect of warm water from Rialto Channel becomes difficult to measure since the water coming from upriver is highly turbid and therefore prone to high temperature spikes during hot days. Conversely, during normal or low water-years the effect of warm water from Rialto Channel would be nullified by the fact that the two tributaries are disconnected, since Rialto Channel water permeates into the riverbed before mingling with RIX surface water. Notwithstanding existing circumstances and new information, EVWD has committed \$1,000,000 of funding for the construction of a well adjacent to the Santa Ana River that would discharge cool water into the river as part of their 1600 Streambed Alteration Agreement with California Department of Fish and Wildlife as a strategy to decrease surface water temperature.

In summary, we have considered the changes that EVWD has decided to make. Considering the most recent available information, we have concluded that the revised conservation measures do not affect sucker in a way that was not considered in our biological opinion (FWS-SB-16B0182-17F0387), and the revised measures do not provide less conservation value to sucker and its designated critical habitat than the originally analyzed measures. We do not expect the revisions to result in adverse effects to sucker or its designated critical habitat that we did not already analyze in our biological opinion (FWS-SB-16B0182-17F0387).

REINITIATION NOTICE

Reinitiation of consultation is required and will be requested by the Federal agency or by the Service, where discretionary Federal involvement or control over the action has been retained or is authorized by law and:

1. If the amount or extent of taking specified in the incidental take statement is exceeded;
2. If new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered;
3. If the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this biological opinion; or
4. If a new species is listed or critical habitat designated that may be affected by the identified action.

Any questions or comments should be directed to [William Sherwin](mailto:William_Sherwin@fws.gov)³ of my staff at 760-322-2070.

Sincerely,

Karin
Cleary-Rose

Digitally signed by
Karin Cleary-Rose
Date: 2023.12.01
14:48:17 -08'00'

for Scott A. Sobiech
Field Supervisor

Revised Appendix D (sep cover)

³ William_sherwin@fws.gov