



CBIA

CALIFORNIA BUILDING
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April 4, 2024

Samantha Murray
President
California Fish and Game Commission
715 P Street, 16th Floor
Sacramento, CA 95814

Electronically Submitted To:
fgc@fgc.ca.gov

**Re: California Fish and Game Commission April 17-18, 2024
Meeting Agenda #22 – Southern California steelhead**

Dear President Murray:

The California Building Industry Association (CBIA) appreciates the opportunity to comment on the petition to list the Southern California steelhead (steelhead) and the accompanying California Department of Fish and Wildlife (Department) Status Review Report. CBIA is a statewide trade association based in Sacramento representing thousands of member companies including homebuilders, trade contractors, architects, engineers, designers, suppliers and industry professionals in the homebuilding, multi-family and mixed-use development markets.

We have reviewed the petition to list the steelhead, the Department's status review report, and additional information submitted by stakeholders and believe that the petitioned action is not warranted and urge the California Fish and Game Commission (Commission) to deny the petition.

CBIA shares the concerns raised by organizations including the Association of California Water Agencies regarding both the scientific basis for a listing determination, the potential impacts on California's water agencies and their ability to reliably provide water, and the impact certain aspects of the listing will have on the state's homebuilding industry.

CBIA is concerned that part of the rationale leading the Department to recommend to the Commission that the petitioned action is warranted is based on serious deficiencies regarding population information and mapping inaccuracies. The Department's status review points out on page 40 (4.2 Sources of Information) that:

“Data limitations and uncertainties associated with historical accounts for Southern SH/RT limits our ability to understand their complete historical abundance and distribution in their range. The majority of available historical data are in reports, technical memos, and other documents that have not undergone a formal peer-review process.”

The report goes on to state that the data constraints “may limit the power of statistical analyses to assess trends in viability criteria. Therefore, the results of the analyses conducted in subsequent portions of this chapter should be interpreted in the context of these limitations.”

CBIA believes that the data limitations has produced flawed analyses and speculation as to what is the current and historical range of the species to the point that several figures contained in the report – for example Figure 7 located on Page 43 and Figure 11 located on Page 58) – could lead a person to believe that Southern California steelhead should be found in certain watersheds where in reality none have been observed.

CBIA believes that if such types of maps are necessary then the Department should utilize the data developed by the U.S. Fish and Wildlife Service in order to provide a level of consistency instead of relying on information and data that is at its core limited and full of uncertainty.

Based on these issues and those raised by organizations including the Association of California Water Agencies, we urge the Commission to find that the petitioned action is not warranted.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Cammarota". The signature is fluid and cursive, with the first name "Nick" being more prominent and the last name "Cammarota" following in a similar style.

Nick Cammarota
Senior Vice President & General Counsel
California Building Industry Association
ncammarota@cbia.org