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**GAVIN NEWSOM, Governor**  
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Governor's Office of Planning & Research

January 8, 2021

**Jan 08 2021**

## STATE CLEARINGHOUSE

Mr. Andrew Young, Project Planner  
Alameda County Planning Department  
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Hayward, CA 94544  
[andrew.young@acgov.org](mailto:andrew.young@acgov.org)

Subject: Mulqueeny Wind Repowering Project, PLN2019-00226, Draft Subsequent Environmental Impact Report, SCH No. 2010082063, Alameda County

Dear Mr. Young:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability from the Alameda County Planning Department (County), as the Lead Agency, for the Draft Subsequent Environmental Impact Report (DSEIR) for the Mulqueeny Wind Repowering Project (Project). pursuant to the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.; hereafter CEQA; Cal. Code Regs., § 15000 et seq.; hereafter CEQA Guidelines). The Project is tiered under the Altamont Pass Wind Resource Area (APWRA) Repowering Program Environmental Impact Report (PEIR; SCH No. 2010082063) certified by the East County Board of Zoning Adjustments on November 12, 2014. The Project is an application for a Conditional Use Permit (CUP) to repower (i.e., replace) an estimated 518 existing or previously existing wind energy turbine sites with up to 36 new turbines. The Project is proposed on 29 nearly contiguous parcels extending over approximately 4,589 acres within the southeastern quadrant of the Alameda County portion of the APWRA in northern California. The purpose of the DSEIR is to evaluate the specific environmental effects of the Project as proposed by Mulqueeny Wind, LLC, a subsidiary of Brookfield Renewable.

CDFW provided comments on the Notice of Preparation (NOP) for the DSEIR in a letter dated May 4, 2020. CDFW is also a member of the Alameda County Wind Repowering/Avian Protection Technical Advisory Committee (TAC) and has participated in meetings hosted by the County to discuss the proposed Project. CDFW is providing comments and recommendations on the DSEIR regarding those activities involved in the Project that are within CDFW's area of expertise and relevant to its statutory responsibilities (Fish and Game Code, § 1802), and/or which are required to be approved by CDFW (CEQA Guidelines, §§ 15086, 15096 and 15204). The County provided an extension to the deadline for submitting comments on the DSEIR to January 8, 2021.

### CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects

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that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a California Endangered Species Act (CESA) Incidental Take Permit (ITP), a Lake and Streambed Alteration (LSA) Agreement, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources. CDFW is also a participating member of the Altamont Pass Wind Resource Area TAC to provide scientific and permitting guidance to Alameda County on wind turbine projects.

## **REGULATORY REQUIREMENTS**

### *California Endangered Species Act*

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

### *Lake and Streambed Alteration*

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et. seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the Project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Mulqueeney Wind, LLC

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**Description and Location:** The Project is located at 170257 Patterson Pass Road (address for one of 29 nearly contiguous parcels) extending over approximately 4,589 acres in the eastern Altamont Pass area of Alameda County. The Project is located north and south of Patterson Pass Road between one and two miles north of Tesla Road, and approximately one mile south of Interstate 580. The Project will allow repowering of an estimated 518 previously existing wind energy turbine sites with up to 36 new turbines with a maximum production capacity of 80 megawatts (MW), using turbines rated between 2.2 and 4.2 MW per turbine. The DSEIR identifies the Environmentally Superior Alternative as the Reduced Project Alternative.

The main differences with the Reduced Project Alternative are a reduction of the total number of turbines (24 versus 36 turbines), individual turbine capacity (2.2 versus 3.465 MW) and total rotor swept area (RSA) (32.8 versus 40.7 hectares). With the Reduced Project Alternative, 18 turbines would be located at nearly the same locations as the proposed Project (but with minor relocations due to the micro-siting process) and 6 turbines would be located at a substantial distance (hundreds of feet) away. The Reduced Project Alternative has a nameplate capacity of 83.16 MW but would be limited to 80 MW operational capacity; its RSA would be 32.8 ha, a 19% reduction compared to the proposed Project.

However, it is not clear if the Reduced Project Alternative is the actual proposed Project which forms the basis of the impacts analysis and the avoidance and minimization measures. For example, although the DSEIR Section 2-1, Project Description, describes the proposed Project as installing up to 36 new wind turbines with a maximum capacity of 80 MW, the *Supplemental Assessment of Revised Mulqueeny Ranch Wind Repowering Project to Minimize Raptor Collisions in the Altamont Pass Wind Resource Area*, Appendix G, p. states “the final turbine layout for the project has been reduced to 24 turbines and includes further relocation of turbines to minimize raptor collisions and to accommodate construction constraints, set-back requirements, and wind conditions.” It is therefore difficult for CDFW to fully understand the full extent of the impacts of the Project; therefore, the SEIR should be clear on the proposed Project description and design, and the biological impacts associated with each Project alternative.

Therefore, CDFW provides the following comments on both the “proposed Project” and the “Reduced Project Alternative” presented in Appendix G.

## **ENVIRONMENTAL SETTING**

The Project site is known to provide habitat for multiple state and federally listed species and other special-status species including, but not limited to the federally and State threatened California tiger salamander (*Ambystoma californiense*), federally threatened and State Species of Special Concern California red-legged frog (*Rana draytonii*), State Species of Special Concern western burrowing owl (*Athene cunicularia*), federally

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endangered and State threatened San Joaquin kit fox (*Vulpes macrotis mutica*), golden eagle (*Aquila chrysaetos*) a State Fully Protected Species (Fish and Game Code, § 3511, the State threatened tricolored blackbird (*Agelaius tricolor*) and the State threatened Swainson's hawk (*Buteo swainsoni*). The site also provides habitat for four native bats including little brown bat (*Myotis lucifugus*), western red bat (*Lasiurus blossevillei*), hoary bat (*L. cinereus*) and State Species of Special Concern Pallid bat (*Antrozous pallidus*).

### **Adjacent Lands**

As noted in the CDFW NOP comment letter, the Project site abuts protected land or potentially future protected land on all four boundaries, including the Contra Costa Water District's Jess Ranch conservation easement and Haera Wildlife Conservation Bank to the north, Two Sisters Burrowing Owl Preserve (near the center of the proposed Project), Lawrence Livermore National Laboratory's Site 300 to the south and east, a proposed conservation easement to the south and west. Figure 3.4-1 in the DSEIR incorrectly depicts the Jess Ranch conservation easement southern boundary as the railroad tracks. According to CDFW records, the southern boundary extends past the railroad tracks and abuts the northern property line of the Project.

A portion of the western boundary of the Project area is located adjacent to the Golden Hills Wind Energy Project (Golden Hills), also located within the APWRA, which is known to provide habitat for western burrowing owl, California tiger salamander, California red-legged frog, and San Joaquin kit fox. Over the required three years of post-construction fatality monitoring under the PEIR, the Golden Hills project has documented mortality of significant numbers of birds and bats, including species such as, golden eagle, red-tailed hawks, burrowing owl, tricolored blackbird, and hoary bat which is on the CDFW Watch List (those with restricted distributions and warranting monitoring of potential threats).

### **Section 3.4.2 BIOLOGICAL RESOURCES**

There is substantial evidence indicating that the proposed Project will have additional or more severe environmental effects on birds and bats, and other adverse effects on biological resources, than were previously analyzed in the PEIR. The DSEIR provides for additional or updated mitigation measures for some impacts; however, CDFW continues to be greatly concerned with golden eagle fatalities documented within the APWRA due to turbine collisions. Monitoring programs at existing wind energy facilities also report high mortality rates for the other raptors considered focal species under the PEIR, namely red-tailed hawk (*Buteo jamaicensis*), American kestrel (*Falco sparverius*) and burrowing owl. Monitoring data also show high fatality of other birds as well as bats. As stated in this letter above, golden eagles are designated as Fully Protected under Fish and Game Code section 3511 which states that a fully protected bird cannot be

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taken at any time. It is also unlawful to take, possess or destroy any birds in the order Falconiformes or Stringiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code. It is also unlawful to take or possess any migratory non-game bird as designated in the Migratory Bird Treaty Act (Fish and Game Code, § 3513). CDFW therefore recommends that the County work with Project proponents in coordination with state and federal wildlife agencies such as the U.S. Fish and Wildlife Service to develop feasible and effective methods to curtail avian fatalities within the APWRA.

### **3.4.1.1 Regulatory Setting**

#### **California Fish and Game Code**

On p. 3.4-3, CDFW recommends including Fish and Game Code, § 3800(a) which makes it unlawful to take any nongame bird except as provided in the code or in accordance with regulations of the commission. All birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds, are nongame birds.

### **Section 3.4.1.2 Environmental Setting**

#### **Tricolored blackbird**

On page 3.4-27, the DSEIR and p. 3-12 of the *Avian Survey Report for the Mulqueeney Ranch Wind Repowering Project*, Appendix D states CDFW conducted tricolored blackbird surveys in 2018 and 2019. CDFW did not conduct the surveys but has records describing where and when the surveys were conducted; records were sent to CDFW California Natural Diversity Database in 2020.

As noted in our NOP comment letter, CDFW recommended the DSEIR include Project-specific impact analyses on tricolored blackbird and Swainson's hawk, two species listed under CESA as threatened. The DSEIR must include detailed habitat assessments for these species and a thorough analysis of potential impacts of the Project on nesting, foraging and roosting habitats on the Project site during construction, *as well impacts to the species from ongoing turbine operations.*

### **Section 3.4.2.3 Impacts and Mitigation Measures**

**2020 Updated PEIR Mitigation Measure BIO-1d: Compensate for impacts on special-status plant species**, p. 3.4-72 proposes that, "Where avoidance of impacts on a special-status plant species is infeasible, loss of individuals or occupied habitat of a special-status plant species occurrence will be compensated for through the acquisition, protection, and subsequent management in perpetuity of other existing occurrences at a 2:1 ratio (occurrences impacted: occurrences preserved)."

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The “2:1 ratio (occurrences impacted: occurrences preserved)” is insufficient to mitigate for the loss of special-status plants. The Project is located within the East Alameda County Conservation Strategy (EACCS) so where impacts cannot be avoided or minimized, compensatory mitigation should be undertaken in accordance with mitigation ratios and requirements developed under EACCS, Table 3-12 for focal plant species.

**Impact BIO-8a: Potential construction-related disturbance or mortality of special-status and non-special-status non-raptor migratory birds**, p. 3.4-86 The DSEIR describes tricolored blackbird nesting habitat as “freshwater marsh within the project site that support large areas of dense vegetation such as cattails, tules, willows, blackberries, thistles, or nettles.”

CDFW recommends the DSEIR identify *all* the potential nesting habitat on the Project site and within 0.5 mile from the Project site. The Status Review for Tricolored Blackbird (CDFW 2018) identifies three resources required for successful breeding: 1) secure nesting substrate, 2) a source of water, and 3) foraging habitat that provides sufficient food resources. The majority of tricolored blackbird breeding colonies have occurred in one of five nesting substrate types: 1) wetland vegetation [either cattail (*Typha* sp.) or bulrush (*Schoenoplectus* sp.)], 2) Himalayan blackberry, 3) thistle, usually milk thistle (*Silybum marianum*) or bull thistle (*Cirsium vulgare*), 4) stinging nettle (*Urtica* sp.), or 5) agricultural grain fields.

**2020 Updated PEIR Mitigation Measure BIO-8a: Implement measures to avoid and minimize potential impacts on special-status and non-special-status nesting birds and raptors:** Remove suitable nesting habitat (shrubs and trees) during the non-breeding season (September 1–January 31) for nesting birds.

CDFW considers that potentially significant impacts may result from Project activities that cause nest abandonment, loss of nest trees, loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), or direct mortality of a State listed or special status species. CDFW recommends that the DSEIR clarify that impacts to suitable nesting habitat will be avoided. Suitable nesting habitat should only be removed if absolutely necessary during construction. CDFW also recommends that the DSEIR require compensation for the permanent loss of nesting habitat, as well as all types of tricolored blackbird habitat noted above. Compensation should include restoration and/or creation and conservation of nesting habitat along with suitable foraging habitat.

**Impact BIO-9a: Permanent and temporary loss of occupied habitat for western burrowing owl**, p. 3.4-90 and **PEIR Mitigation Measure BIO-9a:** Compensate for the permanent loss of occupied habitat for western burrowing owl p. 3.4-91.

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CDFW recommend the DSEIR include compensation for loss of temporary habitat as well as loss of permanent habitat. This compensation is often combined with the compensation required for loss of habitat for California tiger salamander and San Joaquin kit fox.

**Impact BIO-9b: Permanent and temporary loss of foraging habitat for tricolored blackbird and other special-status and non-special-status birds.** CDFW recommends the DSEIR include compensation for loss of permanent and temporary foraging and nesting habitat for tricolored blackbird and other special-status and non-special-status birds.

**Impact BIO-11: Avian mortality resulting from interaction with wind energy facilities,** p. 3.4-95. The DSEIR states, “For nearly all projects and all species, predicted fatalities are low compared to the non-repowered baseline condition. The exceptions are burrowing owl, red-tailed hawk, golden eagle, prairie falcon, and native non-raptors.” This statement should be clarified because the data are either lacking or incomplete for almost half the species listed in Table 3.4-8a, and no wind energy project in the APWRA has a complete set of data for all avian species. The measure should be revised to accurately depict the current avian mortalities in the APWRA.

*Burrowing owl.* The DSEIR, p. 3.4-102, states there is a growing body of circumstantial evidence that indicates that many of the burrowing owl fatalities found during fatality surveys are due to predation rather than turbine collision based on location of carcasses and status of wind turbine operations. However, Smallwood et.al. (2006) noted, in their experience, the number of owl carcasses found in environments lacking wind turbines was not nearly the number of owl carcasses found around APWRA wind turbines. CDFW recommends the DSEIR require annual surveys for breeding and non-breeding burrowing owls and other raptors that may be nesting in or near the Project site. Smallwood et.al. (2007) recommends that minimization of burrowing owl collisions in the APWRA, should include curtailment, siting new wind turbines *as close together as feasible* and outside canyons, ravines, and valleys, and where rodent and owl burrows are relatively scarce. In addition, grazing practices should be modified to prevent accumulations of dung around wind turbines. The current proposed micro-siting, Figure 3.1-2 and Figure 4-2, show the wind turbines spaced far apart so additional mitigation measures should be required, including curtailment. Turbines located within 0.3 mile from breeding owls or within 0.3 mile from the property lines of all protected or proposed to be protected land (described in Environmental Setting above) that provides habitat for western burrowing owls should be curtailed during periods when owls are more frequently away from the nest site and during seasonal variation in movement.

*Swainson's hawk,* p.3.4-105. The DSEIR concludes there is “only one recorded Swainson's hawk fatality in the APWRA, in an area of nonrepowered turbines; no other fatalities of this species have ever been recorded in the APWRA, consequently there is

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very little evidence on which to base any quantitative estimate of fatality risk. Accordingly, it is expected that the mortality rate for Swainson's hawk would remain at or near zero for the project."

CDFW acknowledges there is little evidence on which to base a quantitative estimate of fatality risk. However, the DSEIR does not provide any details such as known nest sites, foraging observations, etc., of Swainson's hawk use in any of the repowered sites within the APWRA. The DSEIR acknowledges that there is a potential for future mortalities based on the three Swainson's hawk observations recorded in the 2020 avian use surveys which seemingly contradicts the statement above.

DSEIR Figure 3.4-2a, p. 3.4-10 shows a hatched temporary construction area in the same location as the Swainson's hawk nest shown in Appendix D, Figure 10. The DSEIR fails to analyze the potential impacts to the known Swainson's hawk nest that could result from the Project's plans to construct a temporary construction area on or near the active nest site. Swainson's hawks are known to have high nest site fidelity, meaning they return to the same site year after year (Estep 1989, Woodbridge et al. 1995). Removal of this nest tree would be a potentially significant impact. As noted above, potentially significant impacts may result from activities that cause nest abandonment, loss of nest trees, loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), or direct mortality of a State-listed or special-status species. As stated in the *Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California* (California Energy Commission and Department of Fish and Wildlife, June 2, 2010), CDFW considers a nest site to be active if it was used at least once during the past five years. Impacts to suitable habitat or individual birds within a five-mile radius of an active nest will be considered significant and to have the potential to "take" Swainson's hawks as that term is defined in §86 of the Fish and Game Code. CDFW recommends the Project avoid known or potential Swainson's hawk nest trees.

CDFW also recommends the Project proponent obtain an ITP for tricolored blackbird and Swainson's hawk for both construction activities and operations.

**PEIR Mitigation Measure BIO-11a: Prepare a project-specific avian protection plan.**

As stated in the NOP comment letter, CDFW recommends a qualified biologist approved by CDFW should conduct annual surveys for the four focal raptor species as well as other raptors, and tricolored blackbird, in all suitable nesting habitat within a minimum of one mile of the turbine locations and within two miles of turbine locations for golden eagle and Swainson's hawk. Surveys should be conducted from December 15 to July 15 for golden eagles, typically from early March to early-mid September for other raptors, and March 1 to August 15 for tricolored blackbird. In addition to nesting season surveys, overwintering surveys should also be conducted for burrowing owl from December 1 to

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January 31. Annual surveys for bat maternity or roosting colonies should also be conducted. Protocol-level survey methodologies should be used, and guidance on survey methodologies for golden eagle, burrowing owl and other species can be found on our website at <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>. CDFW staff is also available to provide additional guidance on appropriate and effective survey protocols. These annual surveys should be conducted during the entire operational term of the Project. CDFW recommends the DSEIR require focused surveys for burrowing owl to estimate burrowing owl nesting density and productivity, so that burrowing owl mortality can be related to the population size.

All turbines located within one mile of a golden eagle or Swainson's hawk nest or communal roosting area, and within 0.5 mile of any other raptor nest or tricolored blackbird colony, should be curtailed. Curtailment should occur each year that active nests are detected during surveys. Curtailment of turbines located near raptor nests and tricolored blackbird colonies should be implemented during daylight and crepuscular hours during the entire nesting season or until young have fledged or the nests have been determined by a qualified biologist to be unsuccessful.

**PEIR Mitigation Measure BIO-11b: Site turbines to minimize potential mortality of birds**, p. 3.4-108. CDFW has reviewed the micro-siting analyses and Project design layouts and does not consider any of these alternatives as sufficient to significantly reducing the avian fatality rate to the fullest extent possible. CDFW recommends that further consideration be given to other feasible alternatives for reducing avian and bat fatalities resulting from the proposed Project, including serious consideration of the no-project alternative, reduction in Project size (number and size of turbines), and various turbine micro-siting arrays to avoid and minimize impacts to avian species, especially the four focal raptor species described in the PEIR, namely golden eagle, red-tailed hawk, American kestrel and burrowing owl as well as other birds and bats.

CDFW recommends more stringent micro-siting requirements: i) turbine locations determined to be at high risk should be relocated or avoided; ii) turbines found to be at a moderate-high risk should be avoided or curtailed during all appropriate raptor nesting and communal roosting seasons. The Reduced Project Alternative would replace 36 2.2 MW capacity turbines proposed under the project with 24 micro-sited 3.465 MW turbines. However, even in the Reduced Project Alternative there still are 11 turbines ranked as Moderate-High Risk and two ranked High Risk, as well as two replacements that have not been analyzed.

**2020 Updated PEIR Mitigation Measure BIO-11i: Implement an avian adaptive management program.** CDFW recommends implementing some of the Adaptive Management Measures (ADMM), such as blade painting, during construction to preemptively reduce avian impacts due to collision and to reduce cost of implementation after construction. For example, the Norwegian study cited in the DSEIR recommended

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painting the blades prior to construction to reduce costs. The ADMMs should be in conjunction with a TAC approved study.

**Impact BIO-14: Turbine-related fatalities of special-status and other bats and 2020 Updated PEIR Mitigation Measure BIO-14a: Site and select turbines to minimize potential mortality of bats**, p. 3.4-124. The measure states that the updated PEIR Mitigation Measure BIO-14a requires the project proponent to use the best information available to site turbines and to select from turbine models in such a manner as to reduce bat collision risk. The generated site specific “best information” will inform turbine siting and operation decisions, and a bat habitat assessment and roost survey will be conducted in the project area to identify and map habitat of potential significance to bats, such as potential roost sites (trees and shrubs, significant rock formations, artificial structures) and water sources. Turbine siting decisions will incorporate relevant bat use survey data and bat fatality records published by other projects in the APWRA.

The two micrositing assessments, Appendix F and Appendix G, provide no assessment for bats or turbine siting to reduce bat fatalities. Appendix F, p. 8 states “there is little information that would suggest micrositing of turbines in an otherwise monotypic landscape, even one with complex topography like the APWRA, would influence potential bat mortality.”

If micrositing is not an effective way to reduce bat mortality then the DSEIR should provide alternative mitigation measures that are known to be effective, such as increasing cut-in speeds, reduced lighting, and Project-wide curtailment during Spring and Fall migration periods. The DSEIR should provide an analysis of effects of operation of turbines and effects of nighttime lighting on bats based on best available scientific information and monitoring reports.

## **FILING FEES**

Filing fees for CEQA documents are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs., tit. 14, § 753.5; Fish and Game Code, § 711.4; Pub. Resources Code, § 21089).

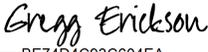
## **CONCLUSION**

CDFW appreciates the opportunity to comment on the proposed Project to assist the County in identifying and mitigating Project impacts on biological resources.

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Questions regarding this letter or further coordination should be directed to Ms. Marcia Grefsrud, Environmental Scientist, at (707) 644-2812 or [Marcia.Grefsrud@wildlife.ca.gov](mailto:Marcia.Grefsrud@wildlife.ca.gov); or Ms. Brenda Blinn, Senior Environmental Scientist (Supervisory), at (707) 944-5541 or [Brenda.Blinn@wildlife.ca.gov](mailto:Brenda.Blinn@wildlife.ca.gov).

Sincerely,

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## REFERENCES

- California Department of Fish and Wildlife (CDFW). 2018. A status review of tricolored blackbird (*Agelaius tricolor*) in California. A Report to the Fish and Game Commission, Nongame Wildlife Program Report 2018, California Department of Fish and Game, Sacramento, CA, USA.
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