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GAVIN NEWSOM, Governor
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October 31, 2023

Oakland Vegetation Management Plan
City of Oakland, Oakland Fire Department
150 Frank H. Ogawa Plaza, Suite 3354
Oakland, CA 94612
DEIR-comments@oaklandvegmanagement.org

Subject: Revised Oakland Vegetation Management Plan, Revised Draft Environmental Impact Report Recirculated DEIR Comments, SCH No. 2019110002, City of Oakland, Alameda County

Dear City of Oakland,

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability (NOA) of a Revised Draft Environmental Impact Report (EIR) from the City of Oakland (City) for the Oakland Vegetation Management Plan (VMP, Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA for commenting on projects that could impact fish, plant, and wildlife resources (Pub. Resources Code, § 21000 et seq.; Cal. Code Regs., tit. 14, § 15386). CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as a permit pursuant to the California Endangered Species Act (CESA), Native Plant Protection Act (NPPA), the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources. Pursuant to our authority, CDFW has the following concerns, comments, and recommendations regarding the Project.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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PROJECT DESCRIPTION AND LOCATION

Proponent: The Oakland Fire Department (OFD) will implement the VMP on behalf of the City of Oakland.

Objective: The objective of the Project is to reduce fuels and manage vegetation in areas within Oakland that are at high risk of wildfire. The Project is designed to manage fuel loads and vegetation on City-owned properties and along roadways in the City's Very High Wildfire Hazard Severity Zone (VHFHSZ) to reduce the likelihood of a catastrophic wildfire, such as the 1991 Oakland Hills Fire. Primary Project activities include thinning, pruning, removal, and other modification of trees and vegetation to reduce the likelihood of a wildfire occurring and to minimize/slow the spread of a wildfire, should one occur.

Location: The Project includes City-owned parcels and the areas within 30 feet of the edge of roadsides located within the City's VHFHSZ as designated by the California Department of Forestry and Fire Protection (CALFIRE) and defined in Section 4904.3 of the Oakland Fire Code (Oakland Municipal Code Chapter 15.12). The Project also encompasses the area within 30 to 100 feet of the edge of roadsides in the City's VHFHSZ where dead and dying trees are present on City-owned property and could strike the road if they fell. Specifically, the Project area includes: 419 City-owned parcels, ranging in size from less than 0.1 acres to 235 acres and totaling 1,924 acres. Parcels have been divided into the following categories: urban and residential (51.2 acres), canyon areas (188.7 acres), ridgetop areas (130.2 acres), City park lands and open space (1,522.9 acres), other areas (24.5 acres), and medians (6.1 acres). "Other areas" are developed City-owned properties that include fire stations (nos. 6, 7, 21, 25, and 28), City facilities (parking lots, police stations), paved areas, and parks and playgrounds (e.g., Montclair Park). The Project includes roadside areas along 308 miles of roadways within the City's VHFHSZ, which includes surface and arterial streets, State Routes 13 and 24, and Interstate 580. The parks, recreational and open space areas are as follows: Beaconsfield Canyon, Garber Park, Dimond Canyon Park, Shepherd Canyon Park, Leona Heights Park, North Oakland Regional Sports Complex, Grizzly Peak Open Space, City Stables, Sheffield Village Open Space, Knowland Park and Arboretum, King Estates Open Space Park, Joaquin Miller Park, Tunnel Road Open Space, Marjorie Saunders Park, and Oak Knoll.

Timeframe: There are no known Project start and end dates.

REGULATORY REQUIREMENTS

California Endangered Species Act And Native Plant Protection Act

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CESA prohibits the take² of any species designated as an endangered, threatened, or candidate species. Similarly, Fish and Game Code section 1908, a section of the NPPA, prohibits the take of any state rare or NPPA-listed as endangered plants. Further, Fish and Game Code sections 2080 and 1908 prohibit the import, export, take, possession, purchase, or sale of any CESA protected species, “or any part or product thereof.” However, CDFW may authorize the take of any such species if that take is incidental to otherwise lawful activities and the conditions set forth in Fish and Game Code section 2081, subdivisions (b) and (c) are met (See Cal. Code Regs., tit. 14, §§ 783.4 & 786.9). In addition, the NPPA provides specific exceptions to the take prohibition of NPPA-listed plants by activity type, including, but not limited to, emergency work, fire control measures, timber operations, and activities required to provide service to the public (Fish & G. Code §§ 1912 & 1913 subd. (a) & (b)). If CDFW has notified the landowner that NPPA listed plants occur on their property, the aforementioned exceptions only apply when the landowner has notified CDFW at least 10 days before the activity to allow for salvage of the NPPA listed plant (Fish & G. Code § 1913 (c)). In the case of emergency work, CDFW must be notified within 14 days after beginning the activity (Fish & G. Code § 1912). Take of a CESA listed species without a CESA permit violates section 2080; take of a CESA and NPPA listed species that does not conform to the scenarios identified in Fish and Game Code violates sections 2080 and 1908.

Please be advised that not all NPPA plants are biologically suited to salvage and translocation. CDFW advises early consultation and coordination to provide the best conservation outcomes for NPPA plants.

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, & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, does not eliminate the Project proponent’s obligation to comply with Fish and Game Code.

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 will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated

² Pursuant to Fish and Game Code section 86, “‘take’ means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

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riparian or wetland habitat; 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 may not execute the final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a Responsible Agency under CEQA.

SPECIFIC COMMENTS AND RECOMMENDATIONS

Comment 1: Potential Adverse Effects on Special-Status Plant Species

Issue: The Project discusses the potential impacts to special-status plants and states three listed plant species are known to occur or potentially occur in the VMP area: federally threatened and state endangered pallid manzanita (*Arctostaphylos pallida*), federally and state endangered Presidio clarkia (*Clarkia franciscana*), and state endangered San Francisco popcornflower (*Plagiobothrys diffuses*). *Mitigation Measure BIO-2b* states the City will prepare a Compensatory Mitigation Plan and provide compensatory mitigation for impacts to special-status plant populations where such impacts are unavoidable. Take of a CESA listed species without a CESA permit violates section 2080; take of a CESA and NPPA listed species that does not conform to the scenarios identified in Fish and Game Code violates sections 2080 and 1908. Additional mitigation may be required pursuant to such a permit.

Evidence impact would be significant: Potential adverse effects to these species from mechanical and hand labor treatments include physical removal of listed plants due to trampling or vehicle access to treatment areas, as well as accidental direct removal during VMP activities. Allowing animals to graze in areas around listed plants could result in animals trampling or consuming listed plants, which would be a significant impact. Herbicides, if used in the vicinity of listed plant populations, could also result in a significant impact by causing the death of individual listed plants.

Recommendation 1: CDFW recommends *Mitigation Measure BIO-2b* be revised to include language defining the Project's obligation to obtain CESA-listed plant take coverage through an Incidental Take Permit (ITP) issued by CDFW when take of listed plant species cannot be fully avoided. CDFW also recommends early consultation when obtaining an ITP as significant modification to the Project and mitigation measures may be required to obtain a CESA ITP. More information on the CESA permitting process can be found on the CDFW website at <https://www.wildlife.ca.gov/Conservation/CESA>. CDFW recommends consulting with the U.S. Fish and Wildlife Service (USFWS) on potential impacts to federally listed species. Consultation with the USFWS in order to comply with the federal Endangered Species Act (ESA) is advised well in advance of Project implementation.

Issue: The Project provides specific mitigation measures for the state listed Presidio Clarkia, as defined under *Mitigation Measure BIO-4: Avoid Presidio Clarkia Sensitive*

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Time Periods, yet does not provide any specific mitigation measures for the other listed plants, specifically the pallid manzanita.

Evidence the impact would be significant: Pallid manzanita is present within Joaquin Miller Park, including the Chabot Space and Science Center and the associated pallid manzanita restoration site located partially within its park boundaries. Additionally, the species has potentially suitable habitat throughout other areas of the VMP. Pallid manzanita commonly occurs near human structures which can represent an extreme wildfire hazard and has been targeted for removal to reduce the threat of wildfire. Additionally, this species is threatened by the use of goat grazing to reduce wildfire fuel loads.

Many of the threats to this listed species are contradicted by the goals and vegetation management activities proposed under the VMP, which is to reduce the likelihood of catastrophic wildfires on City owned lands. Therefore, the Project should provide additional species-specific mitigation measures for the pallid manzanita that will provide compatible fuel reduction methods and treatments while reducing impacts to and provide room for growth and establishment of this listed species.

Recommendation 2:

The City should take a high-level approach to adequately prevent take of CESA and NPPA listed plants and conserve sensitive flora in the City during projects. An all-encompassing Vegetation Protection and Management Plan would provide a streamlined path to complete the Project while protecting sensitive botanical resources and remaining in compliance with Fish and Game Code As such, CDFW recommends creating a City-wide Vegetation Protection and Management Plan that includes the following:

1. A procedure for identifying potential locations of special-status plants prior to Project or activity initiation. Consider incorporating a subscription to the California Natural Diversity Database (CNDDDB), CDFW's positive detection database for all rare plants and animals in California (further information available here: <https://wildlife.ca.gov/Data/CNDDDB/Subscribe>). In addition, the City should incorporate the recently approved East Bay Regional Conservation Investment Strategy (RCIS) which provides publicly available maps of certain special-status species' locations and/or modeled habitat. The RCIS includes maps for pallid manzanita, Presidio clarkia, and most beautiful jewelflower (*Caulanthus californicus*), among other sensitive species that occur in Oakland and elsewhere in the East Bay (ICF 2021);
2. Implement a methodology for surveying for special-status plants prior to project implementation, such as CDFW's Protocols for Surveying and Evaluating

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Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018);

3. Conduct best management practices for avoiding impacts to plants, including temporary flagging or fencing during projects, botanical monitors, appropriate project timing, etc.;
4. A list of City departments and programs engaged in work that could impact botanical resources and a mechanism for collaborating across these independent programs; and
5. An annual training program for all appropriate staff and contractors that conduct activities in special-status plant habitat.

A commitment that if take of CESA listed plants cannot be avoided, the City will consult with CDFW prior to conducting work. Please note, if activities could provide a net benefit to CESA-listed plants, the City could pursue a Safe Harbor Agreement.

Comment 2: Potential Adverse Effects on Special-Status Amphibians and Reptiles

Issue: The Project discusses potential impacts to special-status wildlife species and states that special-status reptiles with the potential to occur in the VMP area include the western pond turtle (*Emys marmorata*), a CDFW Species of Special Concern, and the federally and state threatened Alameda whipsnake (*Masticophis lateralis euryxanthus*). The Project also states that the only special-status amphibian with potential to occur in the VMP area is the federally threatened California red-legged frog (*Rana draytonii*).

The Alameda whipsnake is most likely to occur within coastal scrub and chaparral habitats of the VMP area but may also use adjacent grasslands and oak woodland habitat. Portions of the VMP area are within critical habitat for this species, particularly the Grizzly Peak Open Space. Western pond turtles have the potential to occur within the aquatic habitats in the VMP area, particularly in perennial streams, marshes, and ponds, and have been observed within the Sausal Creek Watershed. California red-legged frog has potential to occur within the aquatic habitat and riparian habitat immediately adjacent to aquatic breeding habitat in the VMP area.

Evidence impact would be significant: Project activities that occur in chaparral and coastal scrub habitats and areas adjacent to these habitats may impact Alameda whipsnake, if present, through injury or mortality. While the Project proposes to minimize activity within 100 feet of streams, some vegetation management could still be needed near creeks to reduce fire hazard which may result in impacts to western pond turtle and California red-legged frog through injury or mortality.

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In *Mitigation Measure BIO-7 (#2)*, the Project states that any coastal scrub and chaparral habitat present within a vegetation treatment area will be inspected by a qualified biologist prior to treatment to determine the presence or potential presence of Alameda whipsnake. The mitigation measure does not provide any information on survey protocols to be used to determine presence/absence of Alameda whipsnake. Due to the elusive, fast-moving nature of Alameda whipsnake and their use of animal burrows as refugia, presence/absence may not accurately locate and allow for full avoidance of Alameda whipsnake. The use of heavy machinery in Alameda whipsnake habitat can cause burrow collapse, resulting in take of Alameda whipsnake that may go unnoticed.

Recommendation 1: To reduce impacts to less-than-significant, CDFW recommends the Project be revised to include restrictions on the use of heavy equipment in Alameda whipsnake suitable habitat areas outside of existing roadways. CDFW recommends restricting mechanical operations within core scrub habitat unless a CESA ITP is obtained. CDFW recommends implementing temperature restrictions conducive to Alameda whipsnake movement for all ground-disturbing operations within suitable habitat areas to allow for snake dispersal. For vegetation removal work in Alameda whipsnake habitat, CDFW recommends operations occur during winter months, where feasible, when snakes are less active (Alvarez, 2021). Additionally, CDFW recommends *Mitigation Measure BIO-7 (#2)* be revised to state ongoing surveys will occur ahead of all manual and mechanical work in suitable habitat areas. CDFW recommends crews be advised on where to broadcast wood chips, avoiding potential Alameda whipsnake refugia such as rocky outcrops and mammal burrows, in addition to limiting chip depth in suitable habitat to prevent disruption of Alameda whipsnake thermoregulation. If take avoidance is not feasible, CDFW recommends the Project state that take coverage will be obtained for the species.

Issue: In *Mitigation Measure BIO-8 (#1)*, the Project states that if vegetation treatment areas occur within 100 feet of aquatic habitat, a qualified biologist will conduct one daytime survey for California red-legged frog within 48 hours before commencement of vegetation management activities. This mitigation measure does not provide the protocols to be used to determine presence/absence of California red-legged frogs within the VMP areas.

Evidence impact would be significant: The proposed one daytime survey contradicts the recommended USFWS survey methodology of incorporating both daytime surveys for the purpose of locating larvae, metamorphs, and egg masses, and nighttime surveys for the purpose of identifying adult and metamorphosed frogs within the Project area. Therefore, the proposed one daytime survey may not be sufficient to avoid impacts to California red-legged frog during Project activities.

Recommendation 2: To reduce impacts to less-than-significant, CDFW recommends that *Mitigation Measure BIO-8 (#1)* be revised to state that presence/absence surveys

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for the California red-legged frog follow the methodology and survey protocol in the *U.S. Fish and Wildlife Service (USFWS) Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog (August 2005)*. CDFW also recommends that nighttime surveys be incorporated into the presence/absence survey methodology, as recommended by the USFWS.

Comment 3: Potential Adverse Effects on Special-Status Mammals and CEQA-relevant Bat Species

Issue: At the April 15-16, 2020 teleconference meeting, the California Fish and Game Commission (Commission) accepted for consideration the petition submitted to list an evolutionarily significant unit (ESU) of mountain lions (*Puma concolor*) in southern and central coastal California as threatened or endangered under CESA. Based on that finding and the acceptance of the petition, the Commission provided notice that the Southern California/Central Coast ESU of mountain lion is a candidate species as defined by Section 2068 of the Fish and Game Code. The *Petition to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened under the California Endangered Species Act (CESA)* can be accessed online at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=171208&inline>, and the CDFW *Evaluation of a Petition From the Center for Biological Diversity and the Mountain Lion Foundation to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened Under the California Endangered Species Act* can be accessed online at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=182184&inline>.

The Southern California/Central Coast ESU encompasses the Central Coast North population which includes Alameda County where the VMP is located. Mountain lions require large areas of relatively undisturbed habitat with adequate prey abundance, and habitat connectivity to allow for successful dispersal and gene flow. Their large home ranges include heterogenous habitats including riparian, chaparral, oak woodlands, coniferous forests, grasslands, all of which can be found within the Project areas (CDFW 2020).

Evidence impact would be significant: During the CESA candidacy period, a species is afforded the same protections as a listed species (Fish and Game Code section 2085). Therefore, the Project must contain operational provisions that avoid take as defined by and consistent with the candidate status of this species under CESA. The Project does not identify mountain lion as a species potentially impacted by VMP activities.

Recommendation 1: CDFW recommends the City evaluate the potential for mountain lion to be present within or adjacent to the VMP area. If found to potentially occur within the VMP area, CDFW recommends the Project be revised to specify potential impacts and incorporate specific and enforceable avoidance and minimization measures for

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impacts to the mountain lion or its habitat. If take of mountain lion cannot be avoided during VMP activities or over the life of the Project, a CESA ITP Permit must be obtained pursuant to Fish and Game Code section 2080 et seq.

Comment 4: Potential Adverse Effects on Special-Status Invertebrates

Issue: The Project discusses the potential impacts to special-status wildlife species and states that special-status invertebrates with the potential to occur in the VMP area include the Crotch's bumble bee (*Bombus crotchii*), a candidate endangered species under CESA. The VMP area is within the current known range of the Crotch's bumble bee and suitable nesting habitat for the species is present in the Project area.

Potential adverse effects to this species from mechanical and hand labor treatments include direct mortality through crushing or filling of active bee colonies and hibernating bee cavities, reduced reproductive success, loss of suitable breeding and foraging habitats, and loss of native vegetation that may support essential foraging habitat.

Evidence impact would be significant: Bumblebees are critically important because they pollinate a wide range of plants over the lifecycles of their colonies, which typically live longer than most native solitary bee species. Crotch's bumble bee are a candidate species under CESA (CEQA Guidelines, §15380, subds. (c)(1)). Unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et. seq. In *Mitigation Measure BIO-14*, the Project states that prior to ground-disturbing activities in grassland or coastal scrub habitat, a qualified biologist will conduct a pre-construction survey for nesting Crotch's bumble bees. The mitigation measure does not provide any information on survey protocols to be used to determine presence/absence of Crotch's bumble bee. In *Impact BIO BIO-2D*, the Project states that temporary removal of floral resources would not result in significant impacts to habitat for Crotch's bumble bee because Project activities would be spread across the landscape during the 10-year timeframe of the VMP. The Project does not specify any protocol or limitations on removing floral resources in suitable habitat areas within the Project footprint.

Recommendation 1: To reduce impacts to less-than-significant, CDFW recommends *Mitigation Measure BIO-14* state that surveys will be conducted during the colony active period (i.e., April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that Project work activities will occur. Further guidance on presence surveys can be found within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (<https://wildlife.ca.gov/Conservation/CESA>).

Recommendation 2: To reduce impacts to less-than-significant, CDFW recommends the Project be revised to indicate that within suitable habitat for Crotch's bumble bee, the treatment area will be divided into a sufficient number of treatment units such that

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the entirety of the habitat is not treated within the same year in order to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. Additionally, CDFW recommends that treatments be conducted in a patchwork pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not removed and untreated portions of occupied or suitable habitat are retained. Finally, CDFW recommends that herbicides be restricted from use on flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September).

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary (Fish and Game Code section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR to assist the City in identifying and mitigating Project impacts on biological resources.

If you have any questions regarding this letter, please contact Katanja Waldner, Environmental Scientist, at (707) 576-2793 or Katanja.Waldner@wildlife.ca.gov; or Julie Coombes, Senior Environmental Scientist (Supervisory), at (707) 576-2825 or Julie.Coombes@wildlife.ca.gov.

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Sincerely,

DocuSigned by:
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REFERENCES

- Alvarez, J., D. Jansen, C. Shaffer, and J. Didonato. 2021. Observations on the phenology of the threatened Alameda whipsnake. California Fish and Wildlife Journal. Special CESA Issue. 258–263.
- California Department of Fish and Wildlife (CDFW). 2020. Report to the Fish and Game Commission. Evaluation of a Petition From the Center for Biological Diversity and the Mountain Lion Foundation to List the Southern California/Central Coast Evolutionarily Significant Unit (ESU) of Mountain Lions as Threatened Under the California Endangered Species Act. California Department of Fish and Wildlife. January 31, 2020. Available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=182184&inline>.