

**State of California  
Department of Fish and Wildlife**



**M e m o r a n d u m**

Governor's Office of Planning & Research

**September 07 2021**

**STATE CLEARINGHOUSE**

Date: September 3, 2021

To: Mr. John Seal  
California Department of Transportation  
District 4; Environmental Planning  
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[John.Seal@dot.ca.gov](mailto:John.Seal@dot.ca.gov)

DocuSigned by:  
*Stephanie Fong*

From: Ms. Stephanie Fong, Acting Regional Manager  
California Department of Fish and Wildlife-Bay Delta Region, 2825 Cordelia Road, Suite 100, Fairfield, CA 94534

Subject: San Mateo 101 Managed Lanes Project North of I-380, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2021070395, San Mateo County

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) for the San Mateo 101 Managed Lanes Project North of I-380 (Project), draft Environmental Impact Report (EIR) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup> CDFW is submitting comments on the EIR as a means to inform the California Department of Transportation (Caltrans) as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project.

**CDFW ROLE**

CDFW is a Trustee Agency with responsibility under CEQA §15386 for commenting on projects that could impact fish, plant and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as the California Endangered Species Act (CESA) Permit, the Native Plant Protection Act Permit, the Lake and Streambed Alteration (LSA) Agreement and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources. Pursuant to our jurisdiction, CDFW has the following concerns, comments, and recommendations regarding the Project.

**PROJECT LOCATION AND DESCRIPTION**

Caltrans, as the lead agency, proposes improvements along United States Interstate – 101 (US-101) from the San Francisco, San Mateo County line to one mile south of the Interstate 380 (I-380), US–101 Interchange in San Mateo County, California.

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<sup>1</sup> 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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The Project proposes improvements along the segment of US-101 that include the addition of one managed lane in both directions of the existing highway, signage, lighting and utility installation. The Project may include the modification of existing structures and installation of an electronic toll infrastructure system. The intent of the Project is to improve mobility along the corridor, encourage carpooling and transit use, improve travel time savings and reliability for managed lane users, minimize congestion within mixed use lanes and provide continuity with mixed lane facilities south of the I-380 intersection.

## **REGULATORY REQUIREMENTS**

### **Lake and Streambed Alteration Agreement**

The Project has the potential to impact stream resources including mainstems, tributaries and floodplains associated with Colma Creek, North Channel and other associated tributaries and drainages known to occur within the identified limits of the Project that have direct connection to San Francisco Bay. If work is proposed that will impact the bed, bank, channel or riparian habitat, including the trimming or removal of trees and riparian vegetation please be advised that the proposed Project may be subject to LSA Notification. This includes impacts to drainage systems that connect to tributaries of main stem creeks and tributaries that occur within the Project Biological Study Area (BSA). CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et. seq., for or any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, bank or channel 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 generally subject to notification 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 impact threatened or endangered species (CEQA section 21001(c), 21083, and CEQA Guidelines section 15380, 15064, 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. More information on the CESA permitting process can be found on the CDFW website at <https://www.wildlife.ca.gov/Conservation/CESA>.

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## Fully Protected Species

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take, except for collecting these species for necessary scientific research and relocation of a fully protected bird species for the protection of livestock. Take of any fully protected species is prohibited, and CDFW cannot authorize their take in association with a general project except under the provisions of a Natural Communities Conservation Plan (NCCP), 2081.7 or a Memorandum of Understanding for scientific research purposes. "Scientific Research" does not include an action taken as part of specified mitigation for a project, as defined in Section 21065 of the Public Resources Code.

## ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand the Project, and its alternative's (if applicable), significant impacts on the environment (CEQA Guidelines, §§15125 and 15360). CDFW recommends that the CEQA document prepared for the Project provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, or endangered species (CEQA Guidelines, §15380). Threatened, endangered, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to:

Common Name	Scientific Name	Status
California red-legged frog	<i>Rana draytonii</i>	FT, SSC
California Clapper Rail/Ridgeway's rail	<i>Rallus obsoletus obsoletus</i>	SFP
Western burrowing owl	<i>Athene cunicularia</i>	SSC
White tailed kite	<i>Elanus leucurus</i>	SFP
Coho salmon – Central California coast ESU	<i>Oncorhynchus kisutch</i>	FE, SE
Steelhead - Central California Coast – DPS	<i>Oncorhynchus mykiss</i>	FT
Longfin smelt	<i>Spirinchus thaleichthys</i>	ST
San Francisco garter snake	<i>Thamnophis sirtalis tetrataenia</i>	SFP
Western pond turtle	<i>Emys marmorata</i>	SSC
Notes: FE = Federally Endangered; FT = Federally Threatened; SE = State Endangered; ST = State Threatened; SFP = State Fully Protected; SSC = State Species of Special Concern; ESU = Evolutionarily Significant Unit, DPS = Distinct Population Segment		

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Habitat descriptions and species profiles should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, and findings from “positive occurrence” databases such as California Natural Diversity Database (CNDDDB). Based on the data and information from the habitat assessment, the CEQA document can then adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends that prior to Project implementation surveys be conducted for special-status species noted in this comment letter with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocols>.

## COMMENTS AND RECOMMENDATIONS

CDFW acting as a Responsible Agency, has discretionary approval under CESA through issuance of a CESA ITP and LSA Agreement, as well as other provisions of the Fish and Game Code that afford protection to the State’s fish and wildlife resources. CDFW would like to thank you for preparing the NOP for the EIR and CDFW recommends the following updates, avoidance and minimization measures be imposed as conditions of Project approval by the lead agency, Caltrans, to ensure all Project-related impacts are reduced below a level of significance under CEQA:

### COMMENT 1: Project Design Analysis and Coordination

**Issue:** The current NOP does not contain Project specific design details or environmental analysis in the form of alternatives or the selection of a preferred alternative. CDFW understands it is early in the environmental analysis and CEQA development process so that information made not yet be available. For the purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources, but in order to provide that expertise CDFW requires more details on the potentially significant impacts of any proposed design alternatives. CDFW is responding to the NOP to encourage interagency coordination through early consultations, scoping meetings and the review of future notices of preparation and notices of completion.

**Evidence the impact would be significant:** The Project may have the potential to create potentially significant impacts to fish and wildlife resources including but not limited to the sections of this letter. In order to avoid or reduce those potentially significant impacts below the threshold of significance CDFW recommends a variety of alternatives are explored and compared to one another in the subsequent environmental document in early coordination with CDFW.

**Recommendation:** CDFW recommends the following is incorporated into the subsequent EIR as conditions of approval:

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**Recommendation Mitigation Measure 1 – Design Coordination:** CDFW recommends incorporation of a condition of approval in the EIR to engage in early and continued coordination before design commences with the CDFW Habitat Conservation and Conservation Engineering Branch to provide the proper review and analysis of any proposed structures or Project elements with the potential to impact fish and wildlife resources. Once a design is selected engineered drawings and design specification planning sheets should be provided to CDFW through continued coordination during the design and permitting process for review and comment; re-initiating consultation at 30% design.

#### **COMMENT 2: San Francisco Garter Snake**

**Issue:** The Project has the potential to result in potentially significant impacts to fish and wildlife resources that support the San Francisco garter snake (SFGS), a State fully protected species known occur within the vicinity of the San Francisco Airport (SFO) (Dudek, 2019; U.S. Fish and Wildlife Service (USFWS), 1985) and within the limits of the proposed Project. Take of a fully protected species is prohibited, and CDFW cannot authorize take of a fully protected species in association with a Project, except under the provisions of an NCCP or a Memorandum of Understanding (MOU) for scientific purposes only. As lead agency, Caltrans must adopt the appropriate avoidance and minimization measures as conditions of approval to avoid take of a fully protected species in the subsequent EIR and design the Project to avoid impact to SFGS and their habitat.

**Evidence the impact would be significant:** The Project proposes to conduct work up to one mile south of the US-101 and I-380 intersection in San Mateo County near SFO within a reasonable dispersal distance of the well documented population of SFGS on the western side of US-101 (Dudek, 2019) that is considered extant (CNDDDB, 2021; DS-45). The population of SFGS surrounding SFO is the only population that exists on the eastern side of the San Francisco Peninsula and is one of the largest and most vigorous SFGS populations (USFWS, 1985). Therefore, this population is critical in the recovery of the species (USFWS, 1985) and any impact represents a potentially significant impact to the recovery of the species. If permanent impacts are proposed within SFGS habitat it may not be feasible to incorporate conditions of approval that can reduce the impacts below a level of significance.

**Recommendation:** CDFW recommends the following are incorporated into the subsequent EIR as conditions of approval:

#### **Recommended Mitigation Measure 1: SFGS Avoidance and Minimization**

The Project shall be designed to avoid impact and Project related activity within suitable SFGS habitat including but not limited to wetlands, streams and waterways as well as associated upland habitat capable of providing dens and basking habitat as determined by a Qualified Biologist, experienced with SFGS, in coordination with

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CDFW. This can be accomplished by designing the Project to not expand or create any new structures on the western side of US-101 from the US-101 and I-380 intersection to one mile south of the intersection to avoid work in suitable SFGS habitat.

### **Recommended Mitigation Measure 2: Early Coordination with CDFW**

The lead agency should engage in early coordination with CDFW at the regional and administrative level in CDFW Headquarters to focus on coordination efforts to ensure the Project is designed to avoid take of a fully protected species. Early coordination is also recommended so the lead agency can explore all potential program options within CDFW. These include but are not limited to; the CDFW Advanced Mitigation Program and Natural Community Conservation Planning Program.

### **COMMENT 3: California Clapper Rail**

**Issue:** The Project has the potential to result in potentially significant impacts to fish and wildlife resources that support California clapper rail aka Ridgeway's rail (CCR), a State fully protected species. As lead agency, Caltrans must adopt the appropriate avoidance and minimization measures as conditions of approval to avoid take of a fully protected species in the subsequent EIR.

**Evidence the impact would be significant:** The Project proposes to conduct work within suitable habitat and within the predicted range of the CCR habitat (CNDDDB, 2021; DS-928, DS-2108). Multiple occurrences of the species are also present within the Project limits in the California Natural Diversity Database (CNDDDB, 2021; DS-45) that are considered extant. If permanent impacts are proposed within CCR habitat, it may not be feasible to incorporate conditions of approval that can reduce the impacts below a level of significance.

**Recommendation:** CDFW recommends the following are incorporated into the subsequent EIR as conditions of approval:

### **Recommended Mitigation Measure 1: CCR Protocol Level Surveys**

Protocol level surveys should be conducted between January 15 and February 1. A minimum of four surveys are required, each survey should be 2 to 3 weeks apart and the final survey should be completed by March or mid-April to ensure that no CCR are present during construction. Surveys should be completed prior to the initiation of construction with three weeks remaining after completion of surveys and before Project initiation to submit results to CDFW for review. Protocol survey requirements should be followed as recommended in the USFWS Clapper Rail Survey Protocol (USFWS, 2015).

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### **Recommended Mitigation Measure 2: CCR Avoidance and Minimization**

If CCR is detected during protocol surveys, no work activity shall occur from February 1 to August 31 during the CCR nesting season, within suitable CCR habitat including but not limited to wetlands, streams and waterways as well as associated upland habitat capable of providing upland refugia habitat as determined by a qualified biologist, experienced with CCR, in coordination with CDFW.

### **Recommended Mitigation Measure 3: CCR Avoidance Buffers**

If breeding CCR are determined to be present, activities will not occur within 700 feet of an identified calling center. If the intervening distance across a major slough channel or across a substantial barrier between the CCR calling center and any activity area is greater than 200 feet, work may proceed at that location within the breeding season in consultation with CDFW.

### **Recommended Mitigation Measure 4: CCR High Tide Restriction**

To avoid the loss of individual CCR's, activities within or adjacent to CCR suitable habitat will not occur within 2 hours before or after extreme high tides (6.5 feet or above, as measured at the Golden Gate Bridge), when the marsh plain is inundated, because protective cover for CCR is limited and activities could prevent them from reaching available cover.

### **COMMENT 4: Longfin Smelt and Steelhead**

**Issue:** The Project has the potential to result in potentially significant impacts to fish and wildlife resources that support longfin smelt, a State Endangered species and Steelhead, a Federally Threatened species known occur within the vicinity of the San Francisco Bay and within Project limits. Please be advised 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.

**Evidence the impact would be significant:** The Project proposes to conduct work within the predicted range of longfin smelt and steelhead (CNDDDB, 2021). An occurrence of the longfin smelt is also present within the Project limits in the CNDDDB (CNDDDB, 2021; DS-45) that is considered extant. If the proposed Project will impact any CESA-listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required to obtain a CESA ITP.

**Recommendation:** CDFW recommends the following measures are incorporated into the subsequent EIR as conditions of approval:

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**Recommended Mitigation Measure 1:** CDFW recommends incorporation of a condition of approval in the EIR to engage in early and continued coordination with the CDFW Habitat Conservation Program to determine if obtainment of an Incidental Take Permit is necessary based on potential Project related impacts to longfin smelt.

#### **COMMENT 5: Fish Passage Assessment**

**Issue:** Senate Bill 857 (SB-857), which amended Fish and Game Code 5901 and added section 156 to the Streets and Highways Code states in section 156.3, "For any project using state or federal transportation funds programmed after January 1, 2006, [Caltrans] shall insure that, if the project affects a stream crossing on a stream where anadromous fish are, or historically were, found, an assessment of potential barriers to fish passage is done prior to commencing project design. [Caltrans] shall submit the assessment to the [Department of Fish and Wildlife] and add it to the CALFISH database. If any structural barrier to passage exists, remediation of the problem shall be designed into the project by the implementing agency. New projects shall be constructed so that they do not present a barrier to fish passage. When barriers to fish passage are being addressed, plans and projects shall be developed in consultation with the [Department of Fish and Wildlife]."

**Evidence the impact would be significant:** Areas within the Project limits including but are not limited to Colma Creek, North Channel and other unnamed tributaries with a direct connection to the San Francisco Bay have the potential to support anadromous fish species or represent streams where anadromous fish were historically found such as Coho salmon (CNDDDB, 2021; DS-804). If the barriers noted within the Project limits identified below are found to be barriers to fish passage, remediation of the problem shall be designed into the Project by the implementing agency.

**Recommendations:** CDFW recommends discussing the following locations as they pertain to US-101, I-380 and fish passage. Location 1, North Channel (US-101; PM 20.6, San Mateo County), Fish Passage Assessment Database ID# 761200, fish barrier status: unassessed. Location 2, North Channel (I-380; PM 6.4, San Mateo County), Fish Passage Assessment Database ID# 761206, fish barrier status: unassessed. Location 3, Unnamed Tributary to San Francisco Bay (US-101; PM 21, San Mateo County), Fish Passage Assessment Database ID# 733792, fish barrier status: unassessed. Location 4, Colma Creek (US-101; PM 24.5, San Mateo County), Fish Passage Assessment Database ID# 761201, fish barrier status: unassessed. Location 5, Tributary to San Francisco Bay (US-101; PM 24.5, San Mateo County), Fish Passage Assessment Database ID# 733793, fish barrier status: unknown. Location 6, Unnamed tributary to San Francisco Bay (US-101; PM 25.2, San Mateo County), Fish Passage Assessment Database ID# 733794, fish barrier status: unknown. The fish passage section should discuss the current status of the crossing locations noted in the California Fish Passage Assessment Database, conduct first pass and or second pass fish assessments, as necessary, as well as, provide images of the upstream and downstream ends of water conveyance structures. CDFW requests a fish passage discussion section is included to

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address these potentially significant impacts through the following avoidance and minimization measure, which should be made a condition of approval by the lead agency:

### **Recommended Mitigation Measure 1: Fish Passage Assessment**

To evaluate potential impacts to native fish species and fisheries resources, Caltrans shall submit the assessment to the [Department of Fish and Wildlife] and add it to the CALFISH database. If any structural barrier to passage exists, remediation of the problem shall be designed into the project by the implementing agency. New projects shall be constructed so that they do not present a barrier to fish passage. When barriers to fish passage are being addressed, plans and projects shall be developed in consultation with the Department of Fish and Wildlife. CDFW shall be engaged prior to design in early coordination and at 30% design at minimum.

### **COMMENT 6: Light Impact Analysis and Discussion**

**Issue:** Currently, the proposed Project locations are situated in highly developed urban environment within San Mateo County but areas of natural habitat associated with Colma Creek, North Channel, Brisbane Lagoon and the San Francisco Bay persist along the US-101 and I-380 corridor. CDFW strongly recommends reducing artificial light spillage beyond the prism of the roadway into natural areas within the Project boundaries that can result in artificial light pollution. Artificial light pollution has the potential to significantly and adversely affect biological resources. Unlike the natural brightness created by the monthly cycle of the moon, the permanent and continuously powered lighting fixtures create an unnatural light regime that produces a constant light output. Continuous light output for 365 days a year can have cumulatively significant impacts on fish and wildlife populations.

**Evidence the impact would be significant:** Artificial night lighting can disrupt the circadian rhythms of many species. Many wildlife species use photoperiod cues for communication (e.g., bird song; Miller 2006), determining when to begin foraging (Stone et al. 2009), behavior thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Artificial night lighting has also been found to impact juvenile salmonid overwintering success by delaying the emergence of salmonids from benthic refugia and reducing their ability to feed during the winter (Contor and Griffith 1995).

**Recommendation:** In segments of the Project that have the potential to direct artificial light pollution into naturalized areas beyond the prism of the roadway, CDFW recommends reducing the number of light poles by increasing the spacing from light pole source to light pole source within the proximity of those resources. In addition, utilizing light shielding, light output restrictions and the following measures may reduce the potentially significant impacts from artificial lighting within the state highway system:

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### **Recommended Mitigation Measure 1: Light Output Limits**

All LED's or bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 kelvin that results in the output of a warm white color spectrum.

### **Recommended Mitigation Measure 2: Vehicle Light Barriers**

Solid barriers at a minimum height of 3.5 feet should be installed in areas where they have the potential to reduce illumination from overhead lights and from vehicle lights into areas outside of the roadway. Barriers should only be utilized as a light pollution minimization measure if they do not create a significant barrier to wildlife movement. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway.

### **Recommended Mitigation Measure 3: Reflective Signs and Road Striping**

Retro-reflectivity of signs and road striping should be implemented throughout the Project to increase visibility of roads to drivers and reduce the need for electrical lighting.

### **Recommended Mitigation Measure 4: Light Pole Modifications and Shielding**

All light poles or sources of illumination that shall be new or replacement installations of existing light sources should be installed with the appropriate shielding to avoid excessive light pollution into natural landscapes or aquatic habitat with the Project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site specific conditions to reduce excessive light spillage into natural landscapes or aquatic habitat within the Project corridor. In areas with sensitive natural landscapes or aquatic habitat the lead agency should also analyze and determine in the subsequent EIR if placing the light poles at non-standard intervals has the potential to further reduce the potential for excessive light pollution caused by decreasing the number of light output sources in sensitive areas.

## **CONCLUSION**

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California's fish and wildlife resources. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Questions regarding this letter or further coordination should be directed to Mr. Robert Stanley, Senior Environmental Scientist (Specialist), at (707) 339-6534 or

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[Robert.Stanley@wildlife.ca.gov](mailto:Robert.Stanley@wildlife.ca.gov); or Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or [Wesley.Stokes@wildlife.ca.gov](mailto:Wesley.Stokes@wildlife.ca.gov).

cc: State Clearinghouse #2021070395

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