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August 4, 2022

Governor's Office of Planning & Research

AUG 04 2022

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STATE CLEARINGHOUSE

Subject: Notice of Completion (NOC) of an Initial Study/Negative Declaration (IS/ND) for the Myhre Arvid J Tr Et Al (DG West 1 LLC) Project (Project) in Monterey County; SCH No.: 2022060506

Dear Fiona Jensen:

The California Department of Fish and Wildlife (CDFW) received a NOC of an IS/ND from Monterey County for the above referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates 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 Fish and Game Code. While the comment period may have ended, CDFW would appreciate if you will still consider our comments.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for 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.

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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CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

As a responsible agency, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: DG West 1, LLC

Objective: The Project, as proposed by DG West 1, LLC would involve the construction of an 11-megawatt alternating current solar photovoltaic (PV) generating facility located in the unincorporated area of south Monterey County, approximately 4,500 feet east of the Salinas River. The purpose of the proposed project is to support renewable energy initiatives established by the State of California; specifically, to reduce the need for imported power. The proposed project would be comprised of PV solar module blocks, as well as related and supporting facilities, including electrical collection lines, on-site service roads, gates and security fencing, and temporary construction staging areas. A 1.4-acre wetland and ephemeral drainage that meet the definitions for State wetlands and waters is located adjacent to the project site. To avoid potential impacts to the wetland and ephemeral drainage, the project has been designed to avoid these features, including a 100-foot buffer.

Solar Arrays and Inverter Blocks

The proposed project includes solar arrays and inverter blocks. The project would install approximately 32,000 solar PV panels to convert solar energy into direct current electricity. The proposed solar panels would be manufactured with anti-reflective glass

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that minimizes the potential for glare. The solar panels would be mounted together in arrays on a fixed-tilt racking system such that the angle of the panels is held constant throughout the day. Solar panels would be mounted on a metal frame anchored into the ground using driven piles. Ground disturbance for installation of the solar panels would occur to a depth of approximately five feet below ground level. The maximum height of the panels would be approximately eight feet. Energy generated from the project's solar panels would be fed back to 44 string inverters where the power would be converted from direct current to alternating current. The alternating current power would travel through the proposed electrical trench to collections boxes and ultimately a set of transformers that would convert the alternating current voltage from 600-volt amperes to 12.47 kilovolts. The proposed project does not include battery storage.

Electrical Collection Lines

Power would be routed from the solar array field to the existing substation using underground 12.47 kilovolt distribution cables. The generated electricity from the solar array would partially offset Aera Energy's energy demand, which is currently supplied by the Pacific Gas and Electric Company. All energy generated from the project would be consumed on site.

Location: The proposed Project is located approximately 5.4 miles south of the town of San Ardo. The project would be built on approximately 40 acres of land within the 159.7-acre Assessor's Parcel Number 423-081-019- 000, known as Ferrini Flats, within the existing 4,480-acre San Ardo Oil Field operated by Aera Energy, LLC (Aera Energy) at 66880 Sargents Road in San Ardo.

Timeframe: Project construction would occur over approximately six-months anticipated to begin in the fourth quarter of 2022, with operation commencing in the second quarter of 2023.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Monterey County Housing & Community Development Department in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the environmental document for this Project.

Special-status Species: Based on aerial imagery, and species occurrence records from the California Natural Diversity Database (CNDDDB), the proposed Project site is known to and/or has potential to support special-status plant and animal species, including CESA-listed species (CDFW 2022), such as: the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*; *SJKF*), the State threatened tricolored blackbird (*Agelaius tricolor*; *TRBL*), the State and federally Least

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Bell's vireo (*Vireo bellii pusillus*, LBV), the California species of special concern Northern California legless lizard (*Anniella pulchra*, NCLL), the pale yellow layia (*Layia heterotricha*), small flowered gypsum loving larkspur (*Delphinium gypsophilum* ssp. *parviflorum*), and Abbott's bush mallow (*Malacothamnus abbottii*).

The environmental document identifies special-status species that have been observed within 5-miles of the Project site and recorded in the CNDDDB. While CNDDDB is a primary resource for special-status species occurrence data, it is not all inclusive. As such, the environmental document does not address special-status species that may occur at or near the Project site based on species range, habitat requirements, or other environmental considerations. Furthermore, surveys of the Project site were only conducted for one (1) day, on February 25, 2021. The environmental documents states that the field survey was conducted to determine the likelihood of any special status plant or wildlife species that may inhabit the Project site. However, this survey was conducted outside of the known blooming period for all three special-status botanical species, at the beginning of the typical bird-breeding season (when breeding/nesting activity may not be actively occurring or obvious), and not over consecutive days to observe species activity. Therefore, several special-status species with the potential to occur are not described or adequately analyzed in the environmental document and may be impacted by construction of the proposed Project.

Specifically, CDFW is concerned about potential impacts to the SJKF, TRBL, LBV, NCLL, and special-status botanical species and makes the following recommendations:

SJKF: SJKF have the potential to occur within the Project boundary (CDFW 2022). The Project has the potential to temporarily disturb and permanently alter suitable habitat for SJKF and directly impact individuals if present during construction and installation of the 32,000 solar panels. SJKF den in a variety of areas such as right-of-ways, agricultural and fallow/ruderal habitat, dry stream channels, and canal levees, and populations can fluctuate over time. SJKF may be attracted to Project areas due to the type and level of ground-disturbing activities and the loose, and friable soils resulting from intensive ground disturbance. SJKF will forage in fallow and agricultural fields and utilize streams such as Sargent Creek, which is present within Project limits, and canals as dispersal corridors. Ground disturbance for installation of the solar panels would occur to a depth of approximately five feet below ground level per Project information. As a result, there is potential for SJKF to occupy all suitable habitat within the proposed Project and surrounding area.

Without appropriate avoidance and minimization measures for SJKF, potential significant impacts associated with solar panel construction include habitat loss, den collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of young, and direct mortality of individuals.

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For all Project-specific components including construction and land conversion, CDFW recommends that a qualified biologist conduct a habitat assessment in advance of Project implementation, to determine if the Project area or its immediate vicinity contains suitable habitat for SJKF. CDFW recommends assessing presence/absence of SJKF by having qualified biologists conducting surveys of Project areas and a 500-foot buffer of Project areas to detect SJKF and their sign. CDFW also recommends following the United States Fish and Wildlife Service (USFWS) “Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance” (2011).

Prior to any ground disturbance or on-site construction activities, and within 30 days prior to initiation of site disturbance and/or construction, the biologist shall conduct a pre-activity survey for known or potential kit fox dens. At a minimum, if kit fox burrows/dens are found, ‘no construction’ buffers/exclusion zones shall be established as follows:

- Potential kit fox den/burrow: 50 feet
- Known or active kit fox den: 100 feet
- Kit fox pupping den: 150 feet

SJKF detection warrants consultation with CDFW to discuss how to avoid take or, if avoidance is not feasible, to acquire a State Incidental Take Permit (ITP) prior to ground-disturbing activities, pursuant to Fish and Game Code section 2081(b).

Take as defined in Fish and Game Code section 86 means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill. Entrapping a State threatened species, such as the SJKF is considered take (Fish & G. Code, § 86). SJKF detection warrants consultation with CDFW to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire a State ITP, pursuant to Fish and Game Code section 2081(b). Full avoidance measures need to be incorporated into the biological document. Mitigation Measures should be amended to include a statement requiring the qualified biologist to have the necessary State and Federal permits authorizing incidental take in order to physically remove an entrapped kit fox.

Additionally, nighttime activities should be avoided; however, if they cannot be avoided, species-specific Best Management Practices should be implemented to avoid take. The proposal of nighttime construction activities may also warrant consultation with the USFWS and consultation with CDFW to discuss how to avoid take of the species.

TRBL: TRBL have the potential to occur in the area of the proposed Project site (CDFW 2022). TRBL colonies require suitable nesting habitat, nearby freshwater, and nearby foraging habitat including semi-natural grasslands, agricultural croplands or alkali scrub (Beedy et al. 2017). Habitat adjacent to the Project area includes both Sargent Creek, as well as a 1.4-acre wetland area.

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Without appropriate avoidance and minimization measures for TRBL, potential significant impacts associated with Project activities include nest and/or colony abandonment, reduced reproductive success, and reduced health and vigor of eggs and/or young. The Project site contains elements that have the potential to support TRBL nesting colonies. TRBL aggregate and nest colonially, forming colonies of up to 100,000 nests (Beedy et al. 2017). This species has been steadily declining due to annual breeding losses due to crop-harvesting activities, insufficient insect resources, and habitat loss due to land conversion for agriculture, rangeland, and urban development (Beedy et al. 2017).

CDFW recommends that Project activities be timed to avoid the normal bird breeding season (February 1 through September 15). However, if Project activities must take place during that time, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBL no more than 10 days prior to the start of implementation to evaluate presence/absence of TRBL nesting colonies in proximity to Project activities and to evaluate potential Project-related impacts.

If an active TRBL nesting colony is found during preconstruction surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer in accordance with CDFW's "Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agriculture Fields in 2015" (CDFW 2015). CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival. It is important to note that TRBL colonies can expand over time and for this reason, the colony should be reassessed to determine the extent of the breeding colony within 10 days for Project initiation.

In the event that a TRBL nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the Project and avoid take, or if avoidance is not feasible, to acquire an ITP, pursuant to Fish and Game Code section 2081(b), prior to any ground-disturbing activities. CDFW recommends that Project activities be timed to avoid the typical bird-breeding season of February through mid-September. If Project activity that could disrupt nesting must take place during that time, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBL no more than 10 days prior to the start of implementation to evaluate presence or absence of TRBL nesting colonies in proximity to Project activities and to evaluate potential Project-related impacts. TRBL detection warrants consultation with CDFW to discuss how to avoid take, or if avoidance is not feasible, to acquire an ITP prior to ground-disturbing activities, pursuant to Fish and Game Code section 2081(b).

LBV: LBV may be present in the Project area (CDFW 2022). Suitable LBV habitat includes rivers and streams with dense riparian vegetation. Riparian vegetation often used include shrubs and trees including willows, mulefat, wild rose, cottonwoods, and

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other dense vegetation. Review of aerial imagery indicates that suitable habitat such as Sargent Creek and the 1.4-acre wetland area adjacent to the Project may provide habitat for LBV. Therefore, the Project has the potential to impact this species.

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of Project implementation, to determine if the Project site or its immediate vicinity contains suitable habitat for LBV. Although LBV inhabit riparian woodlands, the species has also been found to benefit from non-riparian systems including brushy fields, second-growth forest or woodland, scrub oak, coastal chaparral, and mesquite brushlands (Kus and Miner 1989 in Poulin et al. 2011).

CDFW also recommends that Project activities be timed to avoid the typical bird breeding season (February 1 through September 15). If Project activities must take place during the typical bird breeding season, and suitable LBV habitat is detected during habitat assessments, CDFW recommends assessing presence/absence of LBV by conducting surveys following the USFWS' "Least Bell's Vireo Survey Guidelines" (2001) well in advance of the start of Project implementation to evaluate presence/absence of LBV nesting in proximity to Project activities, and to evaluate potential Project-related impacts and permitting needs. Additionally, CDFW advises conducting focused pre-construction surveys for LBV in all areas of potentially suitable habitat within 10 days of Project implementation, when initiated during the bird breeding season.

LBV detection warrants consultation with CDFW to discuss how to avoid take, or if avoidance is not feasible, to acquire an ITP prior to ground-disturbing activities, pursuant to Fish and Game Code section 2081(b).

NCLL: NCLL have the potential to occur in the area (CDFW 2022). NCLL are found primarily in areas with sandy or loose organic soils or where there is plenty of leaf litter (Zeiner et al., 1990d). NCLL are fossorial and inhabit chaparral habitat with sandy or loose loamy soils (Thomson et al. 2016). Review of aerial imagery and soil characteristics indicates that portions of the Project area are comprised of and surrounded by these requisite habitat features (CDFW 2022, UC Davis 2018).

Habitat loss is a primary threat to NCLL (Zeiner et al., 1990). The Project area is within the range of NCLL and portions of it are composed of and bordered by suitable habitat (i.e., chaparral with friable soils). As a result, ground-disturbing activities associated with the installation of solar panels in the Project area have the potential to significantly impact local populations of this species.

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of Project implementation, to determine if the Project area or its immediate vicinity contain suitable habitat for NCLL. If suitable habitat is present, CDFW recommends that

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a qualified biologist conduct focused surveys for NCLL and their requisite habitat features to evaluate potential impacts resulting from ground-disturbance.

Avoidance whenever possible is encouraged via delineation; however, a qualified biologist with the appropriate handling permit may relocate NCLL out of the Project area into a nearby area with suitable habitat.

Botanical Species: CDFW recommends floristic, protocol-level botanical surveys at the Project site to determine presence/absence of special-status species. If special-status species are detected, avoidance, minimization, and/or mitigation measures should be implemented, in coordination with CDFW, for species protection and preservation.

CDFW requests that the IS/ND be revised to fully identify potential impacts to biological resources, including the above-mentioned species. To adequately assess any potential impacts to biological resources, the species must be described, evaluated, and focused and/or protocol biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any potential impacts and associated avoidance, minimization, and/or mitigation measures. Properly conducted biological surveys are required to identify any Project-related impacts under CEQA to species of concern and CESA to CESA-listed species.

Information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>).

Federally Listed Species: CDFW also recommends consulting with the USFWS on potential impacts to federally listed species, specifically, but not limited to, the federally endangered SJKF and LBV. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

Nesting Birds: CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

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To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction area would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Water Pollution: Pursuant to Fish and Game Code section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into “Waters of the State” any substance or material deleterious to fish, plant life, or bird life, including non-native species. It is possible that without avoidance and minimization measures this Project could result in pollution of a “Waters of the State” from increased sediment in storm water runoff or construction related erosion. This could impact fish and wildlife resources by causing increased sediment input and other Project-related activities. The Regional Water Quality Control Board and United States Army Corps of Engineers also has jurisdiction regarding discharge and pollution to “Waters of the State.”

Cumulative Impacts: CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the project, even if those impacts are relatively small (i.e., less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to

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evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports 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 CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

CDFW appreciates the opportunity to comment on the Project to assist the Monterey County Housing & Community Development Department in identifying and mitigating the Project's impacts on biological resources.

If you have any questions, please contact Kari Kyler Daniska, Senior Environmental Scientist (Specialist), at the address provided on this letterhead, by telephone at (559) 341-4633, or by electronic mail at Kari.Daniska@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Bob Stafford

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NCLL Literature Citations

Thomson, R. C., A. N. Wright, and H. B. Shaffer. 2016. California amphibian and reptile species of special concern. California Department of Fish and Wildlife. University of California Press. 408p.

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SJKF Literature Citations

United States Fish and Wildlife Service (USFWS). 2011. Standardized Recommendations for the Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance. United States Fish and Wildlife Service. [Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox prior to or During Ground Disturbance | FWS.gov](#)

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TRBL Literature Citation

Beedy, E. C., W. J. Hamilton III, R. J. Meese, D. A. Airola, and P. Pyle. 2017.
Tricolored Blackbird (*Agelaius tricolor*), version 3.0. *in* The birds of North
America. P. G. Rodewald (Ed.). Cornell Lab of Ornithology, Ithaca, New York,
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Fields in 2015. March 19, 2015.