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Governor's Office of Planning & Research

Oct 17 2022

STATE CLEARINGHOUSE

October 17, 2022

Marcus Jackson
Facilities Planning and Capitol Projects
California Polytechnic State University
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**Subject: California Polytechnic State University, San Luis Obispo Water
Reclamation Facility Project (Project)
Notice of Preparation (NOP)
State Clearinghouse No: 2022090231**

Dear Marcus Jackson:

The California Department of Fish and Wildlife (CDFW) received a NOP for a draft Environmental Impact Report (EIR) from the California State University Board of Trustees at California Polytechnic State University, San Luis Obispo (Cal Poly) 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.

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 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.

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.

Water Rights: The capture of unallocated stream flows is subject to appropriation and approval by the State Water Resources Control Board (SWRCB) pursuant to Water Code § 1200 et seq. CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights and petition processes to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Certain fish and wildlife are reliant upon aquatic and riparian ecosystems, which in turn are reliant upon adequate flows of water. CDFW therefore has a material interest in assuring that adequate water flows within streams for the protection, maintenance, and proper stewardship of those resources. CDFW provides, as available, biological expertise to review and comment on environmental documents and impacts arising from project activities.

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).

In this role, 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.

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CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

PROJECT DESCRIPTION SUMMARY

Proponent: California State University Board of Trustees

Objective: California Polytechnic State University, San Luis Obispo (Cal Poly) is proposing to construct and operate an on-campus water reclamation facility (WRF) and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water meeting the requirements of Title 22 of the California Code of Regulations for unrestricted reuse, including safe application to agricultural crops, pastures, and recreation fields on campus.

The non-potable water demands of the campus that are currently met via untreated water from Whale Rock Reservoir (approximately 15 miles to the northwest) would be transitioned over time to non-potable recycled water supplied by the on-campus WRF. The campus would then use the Whale Rock Reservoir water freed up by operation of the WRF to meet future potable water demand associated with campus growth proposed under the Campus Master Plan. Cal Poly would continue to pump groundwater for agricultural purposes. Because Cal Poly would not increase agricultural operations as part of the Campus Master Plan, non-potable water demands associated with agriculture are not anticipated to increase.

Location: Located in San Luis Obispo County, the Cal Poly campus covers 1,339 acres and abuts the City of San Luis Obispo to the south and west, and open space, rangeland, and public land to the north and east. Cal Poly's main campus consists of 855 acres. An additional 484 acres consisting of rangeland and steep terrain lies to the north, northeast, and northwest of the main campus, and makes up the remainder of the Cal Poly campus property. Cross streets are California Boulevard, Highland Drive, and Mt. Bishop Road. Brizzolara Creek is located to the southeast on campus and Stenner Creek is located to the northwest, west, and south on the campus as well.

Timeframe: None given.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the California State University Board of Trustees/Cal Poly University 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 document for this Project.

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The NOP indicates that the EIR for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect and will analyze these potential effects to the detail necessary to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed Project. When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation.

Special-Status Species: Based on aerial imagery, and species occurrence records from the California Natural Diversity Database (CNDDDB, 2022), the proposed Project site and/or surrounding area is known to and/or has the potential to support special-status species, and these resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities. CDFW is concerned regarding potential impacts to special-status species including, but not limited to, the Federally threatened (FT) and State species of concern (SSC) California red-legged frog (*Rana draytonii*), the Federal species of concern (FSC) and State endangered (SE) foothill yellow-legged frog (*Rana boylei*), the FT steelhead South Central California DPS (*Oncorhynchus mykiss irideus* pop. 9), the Federal Candidate (FC) and SSC Monarch butterfly (*Danaus plexippus*), the SSC Western pond turtle (*Emys marmorata*), the 1B.1 (rare, threatened, or endangered in California and elsewhere) and Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*), the 1B.2 (rare, threatened, or endangered in California and elsewhere) San Luis mariposa lily (*Calochortis obispoensis*), and 1B.3 (rare, threatened, or endangered in California and elsewhere) San Luis Obispo dudleya (*Dudleya abramsii* ssp. *murina*).

California Red-Legged Frog (CRLF)

CRLF have been observed in Brizzolara Creek per CNDDDB records. If suitable habitat is present within the Project site and adjoining area, CDFW recommends that a qualified biologist conduct a habitat assessment and protocol surveys for CRLF as part of the biological technical studies conducted in support of the CEQA document and, regardless of the results of the initial surveys, repeated within 48 hours prior to commencing work (two night surveys immediately prior to construction or as otherwise required by the USFWS) in accordance with the USFWS *Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog* (USFWS 2005) to determine if CRLF are within or adjacent to individual project sites.

If any CRLF are found during the initial protocol surveys conducted as part of the biological technical studies, the preconstruction surveys, or at any time during construction CDFW recommends that CDFW be contacted to discuss a relocation plan for CRLF. If CRLF are found at any time during construction, CDFW recommends that construction cease immediately and that CDFW be contacted to discuss a relocation plan for CRLF.

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CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (November 1 through March 31). If ground-disturbing activities must take place between November 1 and March 31, CDFW recommends that a qualified biologist monitor construction activity daily.

Foothill Yellow-Legged Frog (FYLF)

CNDDDB records show that FYLF have been observed in Brizzolara Creek. CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the CEQA document to determine if the Project area or its vicinity contains suitable habitat for FYLF.

If it is determined through the habitat assessment that habitat suitable to support FYLF is present within or near the project sites, CDFW recommends that focused visual encounter surveys be conducted by a qualified biologist during appropriate survey period(s) (April – October) in areas where potential habitat exists. CDFW advises that these surveys generally follow the methodology described in pages 5–7 of *Considerations for Conserving the Foothill Yellow-Legged Frog* (CDFW 2018a). In addition, CDFW advises surveyors adhere to *The Declining Amphibian Task Force Fieldwork Code of Practice* (DAPTF 1998). If any life stage of the FYLF (adult, metamorph, larvae, egg mass) is found, CDFW recommends consulting with CDFW to develop avoidance measures and evaluate permitting needs.

Submission of survey results to CDFW is recommended. In the event of negative findings, CDFW recommends that consultation with CDFW include documentation demonstrating FYLF are unlikely to be present in the vicinity of the project site. Information submitted may include, but is not limited to, a full habitat assessment and survey results. If any life stage of FYLF is detected, consultation with CDFW is advised to determine if an Incidental Take Permit (ITP) is necessary to comply with CESA.

If surveys find that FYLF are occupying the project area and cannot be avoided, CDFW may issue an ITP authorizing take of FYLF, pursuant to Fish and Game Code section 2081 subdivision (b). Take authorization is issued only when take is incidental to an otherwise lawful activity, the impacts of the take are minimized and fully mitigated, the applicant ensures there is adequate funding to implement any required measures, and take is not likely to jeopardize the continued existence of the species.

Steelhead South-Central California Coast (Steelhead)

An estimated 94,000 steelhead spawned in streams of the central California coast in the early 1960s. Steelhead numbers have been in decline since the 1960's and most coastal streams have remnant runs of 500 fish or fewer (Center for Biological Diversity,

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2021). Per CNDDDB records, Steelhead have been observed in Stenner Creek approximately 0.6-mile upstream of the Project area.

CDFW recommends Project activities avoid work in water and floodplains whenever possible and conducting Project activities during less critical times of the year (June-February) and avoid spawning riffles or holding pools.

Monarch Butterfly (MOBU): Overwintering Population

MOBUs have been observed per CNDDDB just south of Highland Drive near Stenner Creek within the Project limits. CDFW recommends that a qualified biologist conduct a habitat assessment, well in advance of Project implementation. The qualified biologist shall determine if the Project area or its immediate vicinity continues to contain habitat suitable to support the MOBU. The qualified biologist should assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.

If suitable habitat for MOBU is present, CDFW recommends consultation with a qualified biologist and site monitors with knowledge of the history of the grove/area to determine primary roosting trees and other structural components of flora integral to maintaining microclimate conditions. These plants/trees shall be marked and avoided during Project activities. CDFW recommends avoiding or minimizing the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. Management activities in groves should be conducted between March 16th and September 14th, in coordination with the aforementioned biologist (Marcum and Darst, 2021).

If suitable habitat is present, and it is the overwintering period of September 15th – March 15th (Marcum and Darst, 2021), a qualified biologist shall be retained to assess habitat for presence of MOBU. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.

If MOBU are detected within the Project area, MOBU overwintering habitat shall be avoided by delineating and observing a no-disturbance buffer of at least 0.5 mile from the outer edge of the habitat (Marcum and Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted and recommended to determine how to implement ground and tree-disturbing activities and avoid take.

Western Pond Turtle (WPT)

WPT are known to nest in the spring or early summer within 100 meters (approximately 328-feet) of a water body, although nest sites as far away as 500 meters (approximately

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1,640-feet) have also been reported (Thompson et al. 2016). CNDDDB records show that WPT have been observed approximately 0.2-mile upstream from Project limits.

CDFW recommends that a qualified biologist conduct focused surveys for WPT as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial results, ten days prior to Project implementation. In addition, CDFW recommends that focused surveys for nests occur during the egg-laying season (March through August) and that any nests discovered remain undisturbed until the eggs have hatched.

CDFW recommends that if any WPT are discovered at the site immediately prior to or during Project activities, they be allowed to move out of the area on their own.

Special Status Plants (SSP)

Per CNDDDB records, SSPs including Congdon's tarplant, San Luis mariposa lily, and San Luis Obispo dudleya have been observed within and adjacent to the proposed Project site. CDFW recommends the Project area be surveyed for SSPs by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (CDFW, 2022). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. CDFW recommends that the protocol be repeated over two growing and blooming seasons for each species likely to be present, to minimize effects of varying moisture regimes influencing results and maximize detection of rare plants.

CDFW recommends SSP species be avoided whenever possible by delineation of and observing a no-disturbance buffer of at least 50-feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special status plant species.

II. Editorial Comments and/or Suggestions

CDFW requests that the DEIR fully identify potential impacts to biological resources, including the above-mentioned species. In order to adequately assess any potential impacts to biological resources, focused 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 mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, and to identify any Project-related impacts under CESA and other species of concern.

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Therefore, CDFW recommends the DEIR address potential impacts to these species and provide measurable mitigation measures that, as needed, will reduce impacts to less than significant levels. 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 FT steelhead-south-central California coast DPS and the California red-legged frog, and the FC and State SSC monarch-California overwintering population. 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 to comply with FESA is advised well in advance of any ground disturbing activities.

Waters of the State and U.S.: 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 mitigation measures this Project could result in pollution of Waters of the State from storm water runoff or construction-related erosion. Potential impacts to the wildlife resources that utilize watercourses in the Project area include the following: increased sediment input from road or structure runoff; construction-related activity runoff associated with Project-related activities and implementation; and/or impairment of wildlife movement through the area. The Regional Water Quality Control Board and United States Army Corps of Engineers (USACE) also have jurisdiction regarding discharge and pollution to Waters of the State.

Lake and Streambed: The Project is subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent, as well as those that are perennial in nature.

For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593. It is important to note, CDFW is required to comply with CEQA, as a Responsible Agency, when issuing a Lake or Streambed Alteration Agreement. If inadequate, or no environmental review, has occurred, for the Project activities that are subject to notification under Fish and Game Code 1602, CDFW will not be able to issue the Final LSAA Lake and Streambed

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Alteration Agreement until CEQA analysis for the project is complete. This may lead to considerable Project delays.

Water Rights: CDFW recommends the DEIR include a detailed analysis of the water rights and water entitlements that pertain to the Project, including whether any applications or change petitions will be filed. As stated previously, CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Given the potential for impacts to sensitive species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

Nesting birds: Per Google and CNDDDB aerials along with Google Street View, the Project site contains numerous trees within/adjacent to the two creeks within the proposed Project boundaries. While no tree removal was mentioned in the Project information, 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 Codes as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct an assessment of nesting habitat during biological surveys in support of the project's CEQA document, and then repeated as 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 sites 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

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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 areas 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.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the project's CEQA document be used to develop and modify the project's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, remaining impacts to sensitive biological resources should be mitigated to reduce impacts to a less than significant level, if feasible.

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). Cumulative impacts should be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and should be focused specifically on the resource, not the project. An appropriate resource study area should be identified and utilized for this analysis. 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 the California Natural Diversity Database (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>.

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FILING FEES

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. 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 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).

CDFW appreciates the opportunity to comment on the Project to assist the California State University Board of Trustees/California Polytechnic State University in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Kelley.Nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

ec: Patricia Cole (patricia_cole@fws.gov)
United States Fish and Wildlife Service

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LITERATURE CITED

California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed September 27, 2022.

MOBU Literature Citation

Marcum, S., and Darst, C. 2021. Western Monarch Butterfly Conservation Recommendations.

The Xerces Society. 2017. Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat.

CRLF Literature Citation

USFWS. 2005. Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog March 2005. 26 pp.

FYLF Literature Citation

California Department of Fish and Wildlife (CDFW). 2018a. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife, March 2018.

Declining Amphibian Task Force (DAPTF). 1998. The Declining Amphibian Task Force Fieldwork Code of Practice. <https://www.fws.gov/media/declining-amphibian-task-force-fieldwork-code-practice>

Steelhead Literature Citation

Center for Biological Diversity. 2021. [https://www.biologicaldiversity.org/species/fish/central California coast steelhead trout/index.html](https://www.biologicaldiversity.org/species/fish/central_California_coast_steelhead_trout/index.html)

WPT Literature Citation

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 and University of California Press.

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SSP Species

CDFW. 2022. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife.