



State of California – Natural Resources Agency  
 DEPARTMENT OF FISH AND WILDLIFE  
 Habitat Conservation Planning Branch  
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August 17, 2023

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**Subject: General Waste Discharge Requirements for Vegetation and Sediment Management Activities Associated with Fire Fuel Reduction and Flood Control for the Central Coast Region (Project), Notice of Preparation (NOP), SCH# 2023070107**

Dear Kim Sanders:

The California Department of Fish and Wildlife (CDFW) received an NOP from the California Regional Water Quality Control Board, Central Coast Region 3 (RWQCB) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.

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, 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.

## 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.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

**Fully Protected Species:** CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited, though recent legislative changes allow CDFW to issue incidental take permits for Fully Protected Species in limited circumstances (see Fish and Game Code section 2081.15). CDFW should be contacted if a proposed project may impact Fully Protected Species.

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## PROJECT DESCRIPTION SUMMARY

**Proponent:** RWQCB

**Objective:** The objective of the Project is to prepare general waste discharge requirements (WDRs) for vegetation and sediment management activities associated with fire fuel reduction and flood control. The proposed general WDRs will be issued for the regulation of activities including but not limited to vegetation removal or thinning using hand tools, livestock, or heavy equipment such as masticators; implementation of erosion control measures including placement of erosion control materials (fiber rolls, rip-rap) within the stream area; implementation of flood control measures; and sediment removal to restore stream capacity. The potential Project area consists of 11,274 acres where Project activities may occur.

**Location:** Kern, Monterey, San Benito, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, and Ventura counties.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist RWQCB in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Based on the potential for the Project to have a significant impact on biological resources, CDFW concludes that an Environmental Impact Report is appropriate for the Project.

### COMMENT 1: Impacts to Common and Special Status Species

**Issue:** Project activities covered by the general WDRs may include work in habitat that supports species which meet the CEQA definition of rare, threatened, endangered, and other sensitive species, (CEQA Guidelines, §§ 15380, 15063, and 15065) (herein collectively referred to as special status species), including species listed under the Federal Endangered Species Act (FESA), CESA-listed species, and Species of Special Concern (SSC).

Based on available resources and local knowledge, CDFW believes the species listed in Attachment 1 (see end of document) have the potential to be impacted. This list is not exhaustive, and species may be present beyond the ranges listed.

**Specific impact:** Project activities covered by the proposed general WDRs will include vegetation management associated with fuel reduction, sediment removal, implementation of erosion control measures, and implementation of flood control measures. Impacts to special status species may occur in the form of direct impacts to species through human disturbance and use of heavy machinery during project activities that interfere with species behavior or life history, or through habitat modification from vegetation removal or other project activities resulting in removal or degradation of habitat required to sustain the species.

**Why impact would occur:** Special status species may be impacted by Project implementation through increased human disturbance or use of heavy equipment to achieve Project objectives. Impacts from increased human disturbance and use of heavy equipment may occur due to implementation of Project activities, such as vegetation clearance or work within the wetted channel, during biologically sensitive periods, such as nesting, breeding, or spawning season. Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun et al., 2005, Patricelli et al, 2006, Gillam et al., 2007, Slabbekoorn et al., 2008). Physical disturbance from vegetation removal and use of heavy equipment may result in removal of nests or crushing of burrows. Work within the wetted channel may temporarily impede species migration or impact breeding or spawning activities if flow diversion is necessary for equipment to access the wetted channel.

Modifications to habitat may result in adverse impacts to special status species. Vegetation management activities may result in the removal of habitat or reduction of habitat

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complexity from thinning or removal of canopy and understory vegetation in order to meet fuel modification objectives. Implementation of erosion control or flood control measures may result in barriers to fish or other aquatic species.

**Evidence impact would be significant:** CEQA Guidelines §15070 and §15071 require the document to analyze potentially significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. In the absence of an analysis of special status species present within the project area, implementation of proper surveys, and implementation of avoidance and minimization measures, Project activities may result in significant impacts to special status species.

**Recommendations to address/include in the DEIR:**

**Recommendation 1:** CDFW recommends the DEIR include an inventory of rare, threatened, endangered, or other sensitive species where Project activities will be covered by the proposed general WDRs. This should include the species listed in Attachment 1 and any additional sensitive flora and fauna with potential to occur within project sites. Seasonal variations of the project area should also be addressed.

The DEIR should advise subsequent projects to use focused species-specific surveys conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service (USFWS).

CDFW recommends that the DEIR advise subsequent projects to use the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area to assess the potential presence of sensitive species and habitats. Although the CNDDDB is one tool that may identify potential sensitive resources in the area, the dataset should not be regarded as complete for the elements or areas with the potential to be impacted. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship System, California Native Plant Society Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations. In addition, CNDDDB is not a comprehensive database. It is a positive detection database. Records in the database exist only where species were detected and reported. This means there is a bias in the database towards locations that have had more development pressures, and thus more survey work. Places that are empty or have limited information in the database often signify that little survey work has been done there. A nine United States Geologic Survey 7.5-minute quadrangle search is recommended to determine what may occur in the region (see Data Use Guidelines on the CDFW webpage <mailto:https://www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>).

**Recommendation 2:** CDFW recommends that the DEIR include an analysis of potential impacts to sensitive species and their habitat. Environmental impact assessments should consider regional setting when analyzing impacts to rare or unique resources. Potential adverse impacts may include lighting, noise, human activity, activities resulting in ground disturbance, introduction of invasive species, and temporary and permanent Project-related changes on drainage patterns at and downstream of Project activities. In assigning "impact significance" to populations of non-listed species, such as SSC, factors to consider include population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features.

**Recommendation 3:** CDFW recommends that mitigation measures be proposed within the DEIR to alleviate any identified potential impacts to special status species and their habitat. Mitigation measures may include seasonal work periods to avoid impacts to nesting, breeding, spawning, or migrating species; limits to the amount of vegetation clearance or frequency of clearance; methods to reduce the introduction and prevent the spread of invasive species; measures to reduce the effects of noise; measures to limit the

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amount of ground disturbance from heavy equipment; or other scientifically based strategies to reduce impacts to biological resources.

CDFW recommends emphasis on avoidance of vegetation removal during biologically sensitive seasons, including nesting bird season which may occur between February 15-September 1. For special status species known to be present or could potentially be present, species-specific and/or location-specific measures that provide appropriate impact avoidance or reduction according to that species life history should be included.

**Recommendation 4:** The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable, and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be proposed. For off-site mitigation, we recommend the use of a CDFW-approved mitigation bank or other acceptable location approved by CDFW. Any lands proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands pursuant to Assembly Bill 1094 (2012), which amended [Government Code sections 65965-65968](#).

**Recommendation 5:** CDFW acknowledges the regulatory nature of the project will likely preclude it from resulting in direct take of listed species. Nevertheless, if the Project or any related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include a CESA Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish &G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA ITP.

CDFW's issuance of a CESA ITP for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a responsible agency, CDFW may consider the CEQA document prepared by the Lead Agency for the Project. The DEIR should identify the potential of the Project to take CESA species along with appropriate avoidance, minimization, and mitigation measures.

**Recommendation 6:** The EIR should also consider impacts to non-listed species. In assigning "impact significance" to populations of non-listed species, analysts should consider factors such as population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features.

## **COMMENT 2: Impacts to Streambed Areas**

**Issue:** Projects subject to the proposed general WDRs may occur in lakes or streams, including ephemeral and intermittent streams. Project activities may include activities that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a river, lake or stream. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW will determine if the project activities may adversely affect fish and wildlife resources and whether an LSA Agreement (Agreement) with the applicant is required prior to conducting the proposed activities.

CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a responsible agency, CDFW may consider the CEQA document prepared by the Lead Agency for the Project. The DEIR should contain sufficient information related to the potential impacts to lake and stream habitat for projects subject to notification.



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**Specific impact:** Project activities that will be covered by the proposed general WDRs will include vegetation management associated with fuel reduction, sediment removal, implementation of erosion control measures, and implementation of flood control measures. Project activities may result in adverse impacts such as reduction in riparian forest, reduction of shade in streambed areas, and disruption to the natural sedimentation process such as changes in upstream or downstream drainage patterns, runoff, or sedimentation.

**Why impact would occur:** Project activities that would be regulated by the proposed WDRs may occur within 11,274 acres within Kern, Monterey, San Benito, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, and Ventura counties. Streams within the potential project area, including ephemeral and intermittent streams, may be impacted by project activities which provide habitat to special status and common species. The Project may impact streams both during Project activities, due to increased human presence and use of heavy equipment, and long-term resulting from modifications to vegetation management, implementation of erosion control measures, and sediment removal.

**Evidence impact would be significant:** Fuel reduction activities covered by the proposed general WDRs may result in removal or thinning of overstory and understory vegetation along stream banks. Riparian forest and other vegetation types along streambed areas provide bank stabilization, regulation of stream flows during storm events, water temperature regulation through shading, and habitat for a diversity of common and special status species. Removal or thinning of vegetation may result in reduced bank stabilization, increased bank erosion, increased stream flow velocity, and reduced habitat availability or reduced habitat complexity for common and special status species present in the Project area.

Project activities covered by the proposed general WDRs such as sediment removal, placement or implementation of erosion control measures, and placement of flood control features may also result in adverse impacts to streams directly through Project activities, or as a result of stream alterations. These impacts may include direct impacts to aquatic habitat via increased human disturbance during Project implementation, use of heavy machinery within the streambed areas, and temporary water diversion throughout the process of sediment removal. Long term impacts may include disruption of the natural stream sedimentation process, changes to flow patterns upstream or downstream of the Project area, and reduction or degradation of habitat for aquatic and terrestrial species associated with the streambed area.

#### **Recommendations to address/include in the DEIR:**

**Recommendation 1:** CDFW recommends the DEIR include information regarding section 1600 et seq. of Fish and Game Code and requirements for submittal of a notification to CDFW where appropriate, in accordance with Fish and Game Code. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement (more information available at <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>).

**Recommendation 2:** CDFW recommends that the DEIR include information and evaluation of potential Project-related changes in upstream and downstream drainage patterns, stream gradient, runoff, and sedimentation. The DEIR should include full analysis and discussion on treatment types and their potential impact to watercourses. Plans should include protection measures to minimize impact to bed, bank, and channel of watercourses, including delineation of staging and equipment areas and protected areas to be avoided, retention standards for canopy cover, spill prevention measures, restrictions on heavy equipment in stream, measures on clean equipment use, erosion control, revegetation or seeding of disturbed soils, and seasonal work restrictions.

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Effects of Project-related changes to hydrology should also be evaluated for potential impacts to special status and common species associated with aquatic habitat or adjacent areas. CDFW recommends the DEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.

### **COMMENT 3: Nesting Birds**

**Issue:** Projects subject to the proposed general WDRs may impact nesting birds.

**Specific impact:** Take, disturbance, and/or nest abandonment of nesting birds.

**Why impact would occur:** The proposed activities, including mowing, limbing of trees, use of prescribed fire, and mastication, have the potential to cause disturbance to nesting bird species within the project area through direct take of the species, disturbance, destroying of nests or eggs, and nest abandonment.

#### **Recommendation to address/include in the DEIR:**

**Recommendation 1** The DEIR should include protection measures to minimize impacts to nesting birds including nesting bird surveys, seasonal restrictions to avoid nesting season, and implementation of species-specific measures to avoid impacts if nesting birds are found, including, but not limited to appropriate no work buffers around nest locations and monitoring by a qualified biologist.

### **COMMENT 4: Invasive plants and plant pathogens**

**Issue:** Projects subject to the proposed general WDRs may introduce invasive plants and/or plant pathogens.

**Specific impact:** Introduction of invasive species and/or plant pathogens.

**Why impact would occur:** The proposed activities, including erosion control, limbing of trees, and mastication have the potential to introduce invasive species and plant pathogens. Erosion control seed mixes may contain invasive seed such as annual ryegrass (*Lolium multiflorum*). Invasive seed source also has potential to be introduced in supplemental food source for prescribed grazing or carried in by livestock from other sites. Similarly, plant pathogens, like Sudden Oak Death (*Phytophthora ramorum*) may be introduced to the project area via plant debris lodged in soil on tires, boots, and equipment carried into the project area.

#### **Recommendation to address/include in the draft EIR:**

**Recommendation 1:** The DEIR should include measures to restrict the use of invasive seed for erosion control and implement cleaning and sanitation procedures for boots, tires, tools, and equipment prior to entering and exiting the project area.

### **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 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://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

### **ENVIRONMENTAL DOCUMENT FILING FEES**

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The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is 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 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 NOP to assist RWQCB in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Wyatt Erwin, Environmental Scientist, at [CEQA@wildlife.ca.gov](mailto:CEQA@wildlife.ca.gov).

Sincerely,

DocuSigned by:



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Jeff Drongesen, Chief  
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Attachment 1: Special-Status Species

cc: Office of Planning and Research, State Clearinghouse

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- Patricelli, G., and J. J. L. Blickley. 2006. Avian communication in urban noise: causes and consequences of vocal adjustment. *Auk* 123:639–649.
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### Attachment 1: Special-Status Species

Table Key:

FP: Fully Protected  
 SE: State listed as endangered  
 ST: State listed as threatened  
 SC: State candidate for listing as endangered or threatened  
 SSC: CDFW Species of Special Concern  
 SR: State Rare  
 FE: Federally listed as endangered  
 FT: Federally listed as threatened  
 FPE: Federally proposed for listing as endangered  
 FPT: Federally proposed for listing as threatened  
 FC: Federal candidate species (former Category 1 candidates)

Common Name	Scientific Name	Status	Counties
Adobe sanicle	<i>Sanicula maritima</i>	SR	Monterey, San Luis Obispo, San Mateo
American badger	<i>Taxidea taxus</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz San Luis Obispo, San Mateo, Ventura
Arroyo chub	<i>Gila orcuttii</i>	SSC	Santa Barbara, Ventura
Arroyo toad	<i>Anaxyrus californicus</i>	FE, SSC	Monterey, Santa Barbara, Ventura
Bakersfield legless lizard	<i>Anniella grinnelli</i>	SSC	Kern, San Luis Obispo
Bald eagle	<i>Haliaeetus leucocephalus</i>	SE, FP	Monterey
Bank swallow	<i>Riparia riparia</i>	ST	Monterey, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo
Beach layia	<i>Layia carnosa</i>	FT, SE	Monterey
Beach spectaclepod	<i>Dithyrea maritima</i>	ST	San Luis Obispo
Belding's savanna sparrow	<i>Passerculus sandwichensis beldingi</i>	SE	Santa Barbara, Ventura
Black swift	<i>Cypseloides niger</i>	SSC	Monterey, Santa Cruz, San Mateo
Blunt-nosed leopard lizard	<i>Gambelia sila</i>	FE, SE, FP	Kern, Santa Barbara San Benito, San Luis Obispo, Ventura
Burrowing owl	<i>Athene cunicularia</i>	SSC	Kern, San Benito, Santa Clara,
California black rail	<i>Laterallus jamaicensis coturniculus</i>	ST, FP	Monterey, Santa Clara, San Mateo, San Luis Obispo
California condor	<i>Gymnogyps californianus</i>	FE, SE, FP	San Benito, Santa Barbara, Santa Cruz, San Mateo, Ventura
California glossy snake	<i>Arizona elegans occidentalis</i>	SSC	Kern, San Benito, Santa Barbara, Santa Clara, San Luis Obispo
California jewelflower	<i>Caulanthus californicus</i>	FE, SE	Kern, Monterey, San Luis Obispo

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<b>California least tern</b>	<i>Sternula antillarum browni</i>	FE, SE	Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo, Ventura
<b>California Newt</b>	<i>Taricha torosa</i>	SSC	Monterey, San Benito, Santa Barbara
<b>California red-legged frog</b>	<i>Rana draytonii</i>	ST, SSC	Monterey, Santa Barbara, San Benito, Santa Cruz, San Luis Obispo, San Mateo Ventura
<b>California Ridgway's rail</b>	<i>Rallus obsoletus obsoletus</i>	FE, SE, FP	Santa Clara, San Luis Obispo, San Mateo
<b>California steelhead trout</b>	<i>Oncorhynchus mykiss irideus</i>	South-Central CA DPS: FT Southern CA: FE, SC	Monterey, Santa Barbara, Ventura
<b>California tiger salamander</b>	<i>Ambystoma californiense</i>	Central CA DPS: FT, ST Santa Barbara DPS: FE, ST	Kern, Monterey, Santa Barbara, San Benito, Santa Clara San Luis Obispo, San Mateo
<b>Camatta Canyon amole</b>	<i>Chlorogalum purpureum var. reductum</i>	SE	San Luis Obispo
<b>Chorro Creek bog thistle</b>	<i>Cirsium fontinale var. obispoense</i>	FE, SE	San Luis Obispo
<b>Coast horned lizard</b>	<i>Phrynosoma blainvillii</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, Santa Clara, San Luis Obispo, Ventura
<b>Crotch's bumble bee</b>	<i>Bombus crotchii</i>	SC	Kern, Monterey, Santa Barbara, San Benito, Santa Cruz, San Luis Obispo, San Mateo, Ventura
<b>Cuesta Pass checkerbloom</b>	<i>Sidalcea hickmanii ssp. Anomala</i>	SR	San Luis Obispo
<b>Dwarf goldenstar</b>	<i>Bloomeria humilis</i>	SR	San Luis Obispo
<b>Foothill yellow-legged frog</b>	<i>Rana boylei</i>	Central Coast DPS: FPT, SE South Coast DPS: FPE, SE	Monterey, Santa Barbara San Benito, Santa Clara, Santa Cruz, San Mateo, Ventura
<b>Fresno kangaroo rat</b>	<i>Dipodomys nitratoides exilis</i>	FE, SE	San Benito
<b>Gambel's water cress</b>	<i>Nasturtium gambelii</i>	FE, ST	San Luis Obispo
<b>Giant gartersnake</b>	<i>Thamnophis gigas</i>	FT, ST	Kern
<b>Giant kangaroo rat</b>	<i>Dipodomys ingens</i>	FE, SE	Kern, Santa Barbara, San Benito, San Luis Obispo,
<b>Golden eagle</b>	<i>Aquila chrysaetos</i>	FP	Monterey, San Luis Obispo
<b>Hearsts' ceanothus</b>	<i>Ceanothus hearstiorum</i>	SR	San Luis Obispo
<b>Hearsts' manzanita</b>	<i>Arctostaphylos hookeri ssp. Hearstiorum</i>	SE	San Luis Obispo
<b>Kern mallow</b>	<i>Eremalche kernensis</i>	FE	Kern

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<b>La Graciosa thistle</b>	<i>Cirsium scariosum</i> <i>var. loncholepis</i>	FE, ST	San Luis Obispo
<b>Least Bell's vireo</b>	<i>Vireo bellii pusillus</i>	FE, SE	Kern, Monterey, Santa Barbara, San Benito Santa Clara, San Luis Obispo Ventura,
<b>Long-eared owl</b>	<i>Asio otus</i>	SSC	Kern, San Benito, Santa Clara
<b>Maritime ceanothus</b>	<i>Ceanothus maritimus</i>	SR	San Luis Obispo
<b>Marsh sandwort</b>	<i>Arenaria paludicola</i>	FE, SE	San Luis Obispo
<b>Menzies' wallflower</b>	<i>Erysimum menziesii</i>	FE, SE	Monterey
<b>Monarch butterfly</b>	<i>Danaus plexippus plexippus</i>	FC	Monterey, San Luis Obispo
<b>Monterey dusky-footed woodrat</b>	<i>Neotoma macrotis Luciana</i>	SSC	Monterey, San Benito
<b>Monterey gilia</b>	<i>Gilia tenuiflora</i>	FE, ST	Monterey
<b>Monterey hitch</b>	<i>Lavinia exilicauda harengus</i>	SSC	Monterey
<b>Monterey spineflower</b>	<i>Chorizanthe pungens var. pungens</i>	FT	San Luis Obispo
<b>Morro Bay kangaroo rat</b>	<i>Dipodomys heermanni morroensis</i>	FE, SE	San Luis Obispo
<b>Mountain plover</b>	<i>Charadrius montanus</i>	SSC	Kern, San Benito
<b>Nelson's antelope squirrel</b>	<i>Ammospermophilus nelson</i>	ST	Kern, Santa Barbara, San Benito, San Luis Obispo
<b>Nipomo Mesa lupine</b>	<i>Lupinus nipomensis</i>	FE, SE	San Luis Obispo
<b>Northern California Legless Lizard</b>	<i>Anniella pulchra</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, Ventura
<b>Northern harrier</b>	<i>Circus hudsonius</i>	SSC	Kern, San Benito, Santa Cruz, San Mateo, Santa Clara, Ventura
<b>Pacific lamprey</b>	<i>Entosphenus tridentatus</i>	SSC	Monterey
<b>Pallid bat</b>	<i>Antrozous pallidus</i>	SSC	Kern, Monterey, San Benito, Santa Barbara, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo, Ventura
<b>Palmate-bracted bird's-beak</b>	<i>Chloropyron palmatum</i>	FE, SE	San Benito, San Luis Obispo, Ventura
<b>Parish's checkerbloom</b>	<i>Sidalcea hickmanii ssp. Parish</i>	SR	San Luis Obispo
<b>Pismo clarkia</b>	<i>Clarkia speciosa ssp. Immaculata</i>	FE, SR	Monterey, San Luis Obispo
<b>Purple martin</b>	<i>Progne subis</i>	SSC	Monterey, Santa Barbara, San Luis Obispo
<b>Salinas pocket mouse</b>	<i>Perognathus inornatus psammophilus</i>	SSC	Monterey, San Benito, San Luis Obispo
<b>Salinas pocket mouse</b>	<i>Perognathus inornatus psammophilus</i>	SSC	Monterey, San Benito, San Luis Obispo

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<b>San Joaquin coachwhip</b>	<i>Masticophis flagellum ruddocki</i>	SSC	Kern, Monterey, San Benito
<b>San Joaquin coachwhip</b>	<i>Masticophis flagellum ruddocki</i>	SSC	Kern, Monterey, San Benito
<b>San Joaquin kit fox</b>	<i>Vulpes macrotis mutica</i>	FE, ST	Kern, Monterey, Santa Barbara, San Benito, San Luis Obispo Ventura
<b>San Joaquin woolythreads</b>	<i>Monolopia congdonii</i>	FE	Kern, Santa Barbara, San Luis Obispo
<b>Santa Lucia mint</b>	<i>Pogogyne clareana</i>	SE	Monterey
<b>Seaside bird's-beak</b>	<i>Cordylanthus rigidus ssp. littoralis</i>	SE	Monterey
<b>Short-eared owl</b>	<i>Asio flammeus</i>	SSC	San Benito
<b>Short-nosed kangaroo rat</b>	<i>Dipodomys nitratoides brevinasus</i>	SSC	Kern
<b>Southern California legless lizard</b>	<i>Anniella stebbinsi</i>	SSC	Kern, Ventura
<b>Southern coastal roach</b>	<i>Hesperoleucus venustus subditus</i>	SSC	Monterey
<b>Southern Sierra legless lizard</b>	<i>Anniella campi</i>	SSC	Kern
<b>Southwestern willow flycatcher</b>	<i>Empidonax traillii extimus</i>	FE, SE	Kern, Santa Barbara, Ventura
<b>Spadefoot toad</b>	<i>Spea hammondii</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, San Luis Obispo, Ventura
<b>Surf thistle</b>	<i>Cirsium rhothophilum</i>	ST	San Luis Obispo
<b>Swainson's hawk</b>	<i>Buteo swainsoni</i>	ST	Kern, San Benito, Santa Clara, San Luis Obispo
<b>Temblor legless lizard</b>	<i>Anniella alexanderae</i>	SC, SSC	Kern, San Luis Obispo
<b>Tidestrom's lupine</b>	<i>Lupinus tidestromii</i>	FE, SE	Monterey
<b>Tipton kangaroo rat</b>	<i>Dipodomys nitratoides nitratoides</i>	FE, SE	Kern
<b>Townsend's big-eared bat</b>	<i>Corynorhinus townsendii</i>	SSC	Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo,
<b>Tricolored blackbird</b>	<i>Agelaius tricolor</i>	ST, SSC	Ventura, Santa Barbara, San Luis Obispo, Kern, San Benito, Monterey, Santa Cruz, Santa Clara
<b>Tulare grasshopper mouse</b>	<i>Onychomys torridus tularensis</i>	SSC	Kern, San Benito
<b>Two striped garter snake</b>	<i>Thamnophis hammondii</i>	SSC	Kern, Santa Barbara, Ventura
<b>Unarmored threespine stickleback</b>	<i>Gasterosteus aculeatus williamsoni</i>	FE, SE, FP	Santa Barbara, Ventura,
<b>Vernal pool fairy shrimp</b>	<i>Branchinecta lynchi</i>	FT	Kern, Monterey, Santa Barbara, San Benito, San Luis Obispo, Ventura
<b>Western bumble bee</b>	<i>Bombus occidentalis</i>	SC	Monterey, San Benito, Santa Cruz, Santa Clara,

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			San Luis Obispo, San Mateo,
<b>Western mastiff bat</b>	<i>Eumops perotis californicus</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, San Luis Obispo, Ventura
<b>Western pond turtle</b>	<i>Emys marmorata</i>	SSC	Kern, Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo, Ventura
<b>Western red bat</b>	<i>Lasiurus frantzii</i>	SSC	Monterey, Santa Barbara, San Benito, Ventura
<b>Western snowy plover</b>	<i>Charadrius nivosus nivosus</i>	FT, SSC	Kern, Monterey, Santa Barbara, Santa Cruz, San Luis Obispo, Ventura
<b>Western yellow-billed cuckoo</b>	<i>Coccyzus americanus occidentalis</i>	FT, SE	Kern, San Benito, San Luis Obispo, Ventura
<b>White rabbit tobacco</b>	<i>Pseudognaphalium leucocephalum</i>	SR	Ventura
<b>White-tailed kite</b>	<i>Elanus leucurus</i>		Kern, Monterey, Santa Barbara, San Benito, Santa Clara, Santa Cruz, San Luis Obispo, San Mateo, Ventura
<b>Yellow warbler</b>	<i>Setophaga petechia</i>	SSC	Monterey, Ventura
<b>Yellow-breasted chat</b>	<i>Icteria virens</i>	SSC	Monterey, San Benito, Santa Clara