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March 12, 2024

Governor's Office of Planning & Research

Mar 12 2024

STATE CLEARINGHOUSE

Lara Bertaina
District 5 Environmental Planning
California Department of Transportation
50 Higuera Street
San Luis Obispo, California 93401

**Subject: Marina to Castroville CAPM (Project)
Initial Study with Mitigated Negative Declaration
SCH No. 2024010344**

Dear Lara Bertaina:

The California Department of Fish and Wildlife (CDFW) received an Initial Study with Proposed Mitigated Negative Declaration (ISMND) prepared by the California Department of Transportation (Caltrans) 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, 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. While the comment period may have ended, CDFW would appreciate it if you would 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.

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, 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: Caltrans

Objective: Caltrans proposes to preserve 22.2 lane miles of class 2 pavement, pave beyond gore areas, rehabilitate one drainage system, replace traffic management system elements, conduct lighting rehabilitation, build bicycle and pedestrian infrastructure, and upgrade guardrails to the Manual for Assessing Safety Hardware standards.

Location: The proposed Project is located on State Route 1 in Monterey County, from 0.28 miles south of the South Marina Overhead to the State Route 1/156 Junction (post mile (PM) 85.1 to 90.98).

Timeframe: Construction is projected to begin in October 2026, take approximately 122 workdays, and is anticipated to be completed in April 2027. Night work will be required during cold plane and paving activities. If feasible, vegetation removal will be scheduled to occur between October 1 and February 14, outside of the typical nesting bird season.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Caltrans in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. The attached Mitigation and Monitoring and Reporting Program (MMRP) provides a summary of CDFW's additional impact minimization, mitigation, and monitoring

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recommendations that are described below. Editorial comments or other suggestions may also be included to improve the document.

Based on a review of the Project description, a review of California Natural Diversity Database (CNDDDB) records, and a review of aerial imagery of the Project and surrounding habitat, several special-status species could potentially be impacted. In particular, CDFW is concerned regarding potential impacts to the following special status wildlife species and habitats known to occupy the Project area: the federally threatened Monterey spineflower (*Chorizanther pungens var pungens*); the federally proposed threatened Western pond turtle (*Emys marmorata*); the State threatened tricolored blackbird (*Agelaius tricolor*); the state candidate Crotch's bumble bee (*Bombus crotchii*); the state species of special concern burrowing owl (*Athene cunicularia*), Northern California legless lizard (*Anniella pulchra*), pallid bat (*Antrozous pallidus*), spotted bat (*Euderma maculatum*), and western mastiff bat (*Eumops perotis californicus*); the California Rare Plant Rank 1B.2 Sandmat Manzanita (*Arctostaphylos pumila*); and the G3 S3 rank sensitive natural community *Lupinus chamissonis* – *Ericameria ericoides* shrubland alliance.

CDFW recommends that the following modifications and/or edits be incorporated into the MND, including proposed avoidance, minimization, and compensatory measures, prior to its adoption by Caltrans.

COMMENT 1: Special Status Plants

Issue: The ISMND does not define a no-disturbance buffer zone for special status plants. Plants listed pursuant to the federal Endangered Species Act and the Native Plant Protection Act, as well as other special status plants such as California Rare Plant Rank (CRPR) occur in many locations within the Project area. Species of concern include but are not limited to the federally threatened Monterey spineflower (*Chorizanthe pungens var. pungens*) and CRPR 1B.2 Sandmat manzanita (*Arctostaphylos pumila*). Special-status plant species are threatened with habitat loss and habitat fragmentation resulting from development, vehicle and foot traffic, and introduction of non-native plant species (California Native Plant Society 2018), all of which may be unintended impacts of the Project. Therefore, impacts of the Project will potentially have significant and cumulative impacts to populations of the species mentioned above if present in the Project area.

Recommended Mitigation Measure: Avoidance

CDFW recommends special-status plant species be avoided whenever possible by delineating 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.

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COMMENT 2: *Lupinus chamissonis* - *Ericameria ericoides* Shrubland Alliance

Issue: The ISMND used the Holland classification Central Dune Scrub and did not appropriately characterize the sensitive natural community *Lupinus chamissonis* – *Ericameria ericoides* shrubland alliance per current standards. The *Lupinus chamissonis* – *Ericameria ericoides* shrubland alliance (Alliance) has a G3 global rank and an S3 state rank meaning the Alliance and associations are rare and threatened throughout its range and in the state. CDFW recommends following the “Protocols for surveying and evaluating impacts to special status native plant populations and sensitive natural communities” to correctly characterize the Alliance and evaluate potential impacts (California Department of Fish and Wildlife 2018).

Recommended Mitigation Measure: Environmentally Sensitive Areas

CDFW recommends outlining the boundaries of the Alliance using highly visible construction fencing and delineating them as environmentally sensitive areas that will be off-limits to construction equipment and personnel.

Recommended Mitigation Measure: Revegetation

If work cannot be avoided within the Alliance, CDFW recommends limiting the work done in the area to the minimum amount of time necessary to complete construction. If plants are impacted during work, CDFW recommends mitigating by revegetating the affected area with the appropriate locally native vegetation after construction has ended.

COMMENT 3: Crotch’s Bumble Bee (CBB)

Issue: The ISMND does not address possible take of the state candidate CBB. CBB are known to inhabit areas of grasslands and scrub that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses. CBB was once common throughout most of central and southern California. However, it now appears to be absent from most of their range, especially in the central portion of its historic range within California’s Central Valley (Hatfield et al. 2015). Analyses by the Xerces Society for Invertebrate Conservation, Defenders of Wildlife, Center for Food Safety (2018) suggest there have been sharp declines in relative abundance by 98% and persistence by 80% over the last ten years.

CBB primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under piles of brush, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2015). Overwintering sites utilized by CBB mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Therefore, ground disturbance and vegetation removal associated with Project activities has the potential to significantly impact

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local CBB populations. As a state candidate species, take of CBB without appropriate incidental take authorization from CDFW would be a violation of Fish and Game Code.

Recommended Mitigation Measure: CBB Surveys and Take Authorization

CDFW recommends a qualified biologist conduct focused surveys for CBB as well as potential nesting sites (small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs) following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023) in the appropriate survey season prior to construction. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the survey. If candidate bumble bees will be captured or handled, a 2081(a) Memorandum of Understanding with CDFW would be required. If CBB is observed in the Project area, consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground-disturbing activities may be warranted. Take authorization would occur through issuance of an Incidental Take Permit (ITP) by CDFW, pursuant to Fish and Game Code section 2081, subdivision (b).

COMMENT 4: Western Pond Turtle (WPT)

Issue: The ISMND did not include focused surveys for the federally proposed threatened WPT and concluded low impact. The Project area falls within the habitat range of WPT, and a review of aerial imagery shows requisite habitat features that WPT utilize for nesting, overwintering, dispersal, and basking occur in the Project area. These features include aquatic and terrestrial habitats such as rivers, lakes, reservoirs, ponded areas, irrigation canals, riparian and upland habitat. WPT are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported (Thomson et al. 2016). Noise, vegetation removal, movement of workers, construction, and ground disturbance as a result of Project activities have the potential to significantly impact WPT populations. Without appropriate avoidance and minimization measures for WPT, potentially significant impacts associated with Project activities could include nest reduction, inadvertent entrapment, reduced reproductive success, reduction in health or vigor of eggs and/or young, and direct mortality.

Recommended Mitigation Measure: WPT Surveys

CDFW recommends that a qualified biologist conduct focused surveys for WPT within 10 days prior to Project implementation. In addition, CDFW recommends that focused surveys for nests occur during the egg-laying season of March through August.

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Recommended Mitigation Measure: WPT Avoidance

CDFW recommends that any WPT nests that are discovered remain undisturbed with a no-disturbance buffer maintained around the nest until the eggs have hatched and neonates are no longer in the nest or Project areas. If WPT individuals are discovered within the Project area during surveys or Project activities, CDFW recommends that they be allowed to move out of the area of their own volition without disturbance.

COMMENT 5: Burrowing Owl (BUOW)

Issue: The ISMND did not conduct focused surveys or establish a no-disturbance buffer zone for the state species of special concern BUOW. The Project area is within the known geographic range of the burrowing owl (BUOW). BUOW inhabit open grasslands containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Based on aerial imagery and recent occurrences reported on the California Natural Diversity Database (CDFW 2024), the Project area contains suitable habitat for BUOW nesting and foraging.

Recommended Mitigation Measure: BUOW Surveys Prior to Construction

CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's (CBOC) "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012) the survey season immediately prior to construction.

Recommended Mitigation Measure: BUOW Avoidance

Should a BUOW be detected, CDFW recommends that no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

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Recommended Mitigation Measure: BUOW Passive Relocation and Mitigation

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), excluding birds from burrows is not a take avoidance, minimization, or mitigation method and is instead considered a potentially significant impact under CEQA. However, avoidance of direct impacts to BUOW and BUOW eggs and chicks is necessary to avoid violations of Fish and Game Code sections 3503 (taking or destroying nests or eggs, 3503.5 (take of birds of prey or their eggs), and/or 3513 (take of migratory non-game birds). However, if it is necessary for Project implementation, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, by a qualified biologist, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of one (1) burrow collapsed to one (1) artificial burrow constructed (1:1) to mitigate for evicting BUOW and the loss of burrows. BUOW may attempt to colonize or re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance at a rate that is sufficient to detect BUOW if they return.

COMMENT 6: Tricolored Blackbird (TRBL)

Issue: The ISMND does not establish a no-disturbance buffer zone or address the possible take of the state threatened TRBL. The Project area is within the known geographic range of TRBL and two historic occurrences of breeding colonies were documented within 1 mile of the Project vicinity (CDFW 2024). TRBL breed within the vicinity of fresh water, primarily in marshy areas. Important sites for nesting colonies include heavy growths of cattails, tules, thistles, willows, blackberries, mustard, nettles, and salt cedar (Grinnell and Miller 1944). TRBL are also known to breed in alfalfa, wheat, and other low agricultural crop fields, and these fields are becoming an increasingly important nesting habitat type, particularly in the San Joaquin Valley (Beedy et al. 2023). Based on aerial imagery and the information provided, there are several agricultural fields and marshy fields within the vicinity of the Project area that could contain habitat suitable for TRBL nesting and foraging.

Recommended Mitigation Measure: TRBL Avoidance and Take Authorization

If an active TRBL nesting colony is found, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer around the colony in accordance with CDFW's "Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015" (California Department of Fish and Wildlife 2015). CDFW advises that this buffer remain in place until the breeding season (February 1 through September 15) 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

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colonies can expand over time. If at any time a TRBL nesting colony is detected, 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, subdivision (b), prior to any ground-disturbing activities.

COMMENT 7: Northern California Legless Lizard (LL)

Issue: The ISMND did not mention the potential for the CDFW species of special concern LL to occur within the Project area or the potential impacts to the species. LL are found primarily in areas with sandy or loose organic soils or where there is plenty of leaf litter and habitat loss is a primary threat to LL (Zeiner et al. 1990). The Project area is near habitats that might support the species and thus, the Project has potential to impact the species. LL have also been documented within the Project area on multiple occasions (California Department of Fish and Wildlife 2024). Without appropriate avoidance and minimization measures for LL, potentially significant impacts associated with the Project's activities could include site abandonment which may result in reduced health or vigor of eggs and/or young, and/or direct mortality.

Recommended Mitigation Measure: LL Surveys

CDFW recommends a qualified biologist determine if suitable habitat is present within the Project area. If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for LL and their requisite habitat features to evaluate potential impacts resulting from ground-disturbance.

Recommended Mitigation Measure: LL Avoidance

Avoidance whenever possible is encouraged via delineation. However, a qualified biologist with the appropriate permit may relocate LL out of harm's way into a nearby area with suitable habitat.

COMMENT 3: Special Status Bats

Issue: The ISMND did not address the possibility of day roosting bats. Bats may roost in a variety of natural and man-made habitats that are present in the Project area, including trees, cliffs, and man-made structures such as buildings, bridges and culverts. Bats are particularly more likely to utilize man-made structures even near busy highways and urban areas when natural habitat is limited, such as in the Project area. Without appropriate avoidance and minimization measures for bats, Project activities may result in potentially significant impacts to roosting or maternal bats, including potential inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

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Recommended Mitigation Measure: Bat Surveys and No-Disturbance Buffers

CDFW recommends that a qualified biologist conduct focused surveys for bats and potential roosting habitat within 400 feet of the Project area prior to Project activities. Avoidance whenever possible is encouraged via delineation and observance of no-disturbance buffers according to activity and species, as recommended in Table 7-1 of "Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions" (H. T. Harvey & Associates 2021), ranging from 100 feet to 400 feet. If roosting bats are observed within the Project area and buffer areas, CDFW recommends that Caltrans stop work in the buffer area and coordinate with CDFW for site-specific impact minimization recommendations. To mitigate potential Project impacts on bats, CDFW encourages Caltrans to incorporate bat habitat into the Project design.

II. Editorial Comments and/or Suggestions

CDFW requests that the ISMND fully identify potential impacts to biological resources, including the above-mentioned species. To adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by qualified wildlife biologists/botanists during the appropriate survey period(s) for each species 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. CDFW recommends the ISMND 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/SurveyProtocols>).

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 1 through September 15), 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 wildlife 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 area 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

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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 wildlife 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 wildlife biologist counsel and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Federally Listed Species: CDFW recommends that Caltrans coordinate with the United States Fish and Wildlife Service (USFWS) on potential impacts to federally listed Monterey spineflower and federally proposed WPT as part of the research in support of the determination of effect for the species in the ISMND. Take under the federal Endangered Species Act (ESA) is more broadly defined than CESA; take under ESA 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/denning. CDFW advises that Caltrans consult with the USFWS to comply with the ESA well in advance of any ground-disturbing activities.

Lighting Alternative: The ISMND proposed lighting rehabilitation along the northbound and southbound off-ramps at Reservation Road. Due to their efficiency and brightness, Light Emitting Diodes (LEDs) are used in nearly all current outdoor lighting projects. As a result of their lower cost and efficiency, LEDs have also been used more than prior lighting sources. Light pollution is becoming more understood as an environmental impact and studies have demonstrated the potential impact on animal movement, reproduction, stress, fear, sleep, circadian rhythms, vision, pollination, and planet phenology (Longcore, 2023). Traditionally used low-pressure sodium and high-pressure sodium lamps emit primarily yellow or amber light, whereas the LEDs they have been replaced with emit full spectrum “white” light that has more peaks in shorter blue and ultra-violet wavelengths. Light sources with varying spectral properties have the potential to inflict a wide array of effects on different species, and lighting that emit a narrow spectrum of light are less likely to have an ecological impact when compared to broader spectrum or ‘whiter’ light sources (LEDs and metal halide lamps) (Gaston et al., 2012). Shorter wavelengths (blue, ultra-violet) contribute to skyglow more than longer

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wavelengths (red, orange, yellow) as they scatter more in the atmosphere, and it has been shown that peak sensitivity to light for most species is in the blue region of the spectrum (Longcore, 2023). CDFW suggests the use of light sources only where needed and that are no brighter than necessary to maintain safety requirements, and the use of warmer colored lights where possible.

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 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>.

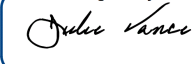
FILING FEES

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).

CDFW appreciates the opportunity to comment on the Project to assist Lead Agency in identifying and mitigating Project 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 Dylan Burkey, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 767-0923, or by email at dylan.burkey@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

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**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
 RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
 (MMRP)**

PROJECT: Marina to Castroville CAPM

CDFW provides the following measures be incorporated into the MMRP for the Project:

RECOMMENDED MITIGATION MEASURE	STATUS/ DATE/ INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
CBB surveys	
CBB take authorization if needed	
WPT surveys	
BUOW surveys	
BUOW mitigation if needed	
TRBL take authorization if needed	
LL surveys	
Bat surveys	
Revegetation Plan	
<i>During Construction</i>	
Special-status plant avoidance	
Sensitive natural community avoidance	
CBB avoidance	
WPT avoidance	
BUOW avoidance	
TRBL avoidance	
LL avoidance	
Bat avoidance	