



State of California – Natural Resources Agency
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May 20, 2024

Ms. Haleigh Frye
Sonoma County Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
Haleigh.Frye@sonoma-county.org

Subject: UPC19-0012 Bloomfiled Flowers LLC., Initial Study/Mitigated Negative Declaration, SCH No. 2024040916, Sonoma County

Dear Ms. Frye:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study/Mitigated Negative Declaration (IS/MND) from the County of Sonoma (County) for the UPC19-0012 Bloomfiled Flowers LLC. (Project) pursuant the California Environmental Quality Act (CEQA).

CDFW is submitting comments on the IS/MND to inform the County, as the Lead Agency, of our concerns regarding potentially significant impacts to sensitive resources associated with the proposed Project. CDFW is providing these comments and recommendations regarding those activities involved in the Project that are within CDFW's area of expertise and relevant to its statutory responsibilities (Fish & G. Code, § 1802), and/or which are required to be approved by CDFW (CEQA Guidelines, §§ 15086, 15096 & 15204).

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 these comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.)

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Likewise, to the extent the Project 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.

PROJECT DESCRIPTION SUMMARY

Proponent: Michael Agin (Applicant)

Description and Location: The Project site is located at 4707 Bloomfield Road, in the City of Petaluma, Sonoma County, California 95476; APN: 027-050-022.

The proposed Project consists of the development of a new commercial cannabis operation, including centralized cannabis processing, 5,000 square-feet of indoor cultivation, and 10,000 of mixed light cultivation, in addition to accessory propagation (for on-site use). The operation would occupy a total area of approximately 2.5-acre portion of a 113-acre parcel.

SPECIES POTENTIAL

Threatened, endangered, and other special-status species that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to:

- California red-legged frog (*Rana draytonii*; FT, SSC)
- Western pond turtle (*Actinemys marmorata*; SSC)
- Western red bat (*Lasiurus frantzii*; SSC)
- Burrowing owl (*Athene cunicularia*; SSC)
- White-tailed kite (*Elanus leucurus*; SFP)
- Congested-headed hayfield tarplant (*Hemizonia congesta ssp. congesta*; 1B.2)
- Contra Costa goldfields (*Lasthenia conjugens*; FE)
- American badger (*Taxidea taxus*; SSC)

FE = Federally Endangered; FT = Federally Threatened; SE = State Endangered; ST = State Threatened; SFP = State Fully Protected; SSC = State Species of Special Concern

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California Rare Plant Rank (CRPR)

- 1B = Rare, Threatened, or Endangered in California and Elsewhere

CRPR Threat Ranks

- 0.1-Seriously threatened in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- 0.2-Moderately threatened in California (20-80 percent occurrences threatened/moderate degree and immediacy of threat)

COMMENTS AND RECOMMENDATIONS

CDFW offers the below comments and recommendations to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

COMMENT 1: Lake and Streambed Alteration Notification

Issue: Cannabis cultivators applying for an Annual License from the Department of Cannabis (DCC), <https://cannabis.ca.gov/>, must have an LSA Agreement or written verification that one is not needed. CDFW requires an LSA Agreement when a project activity may substantially adversely affect fish and wildlife resources. LSA Agreements provide actions to avoid and minimize adverse impacts and provide protections to California's fish and wildlife resources. CDFW does not currently have a record of LSA notification on file for this Project.

Recommendations: CDFW recommends the Applicant submit an LSA notification for the Project pursuant to Fish and Game Code section 1602 well in advance of Project construction. Additional information about the LSA notification process for cannabis cultivation projects is described on CDFW's website at <https://wildlife.ca.gov/Conservation/Cannabis/Permitting>.

COMMENT 2: Special-Status Plant Surveys

Issue: The IS/MND states that the Project parcel has the potential for multiple special-status plants to occur on-site, including, but not limited to the following: congested-headed hayfield tarplant and Contra Costa goldfields. The IS/MND also states that none of these plants are expected to occur on the Project site because their primary habitat requirements are lacking and were not observed during surveys performed within the Project site on January 6 and November 30, 2019. However, the timing of botanical surveys was conducted outside the appropriate season to accurately detect occurrences. Additionally, congested-headed tarplant may occur within grassland

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habitat, which is present on-site where cannabis activities are proposed. Contra Costa goldfields observations have also been documented approximately one mile to the west of the Project site (California Natural Diversity Database [CNDDDB], Accessed May 2024). Although Contra Costa goldfields are often found in vernal pool habitat and swale habitat, they also may occur in other depression areas within grassland habitat. Due to the presence of grassland habitat on-site, Contra Costa goldfields may potentially be present on-site.

Recommendations: A Qualified Biologist should conduct surveys during the appropriate blooming period and include considerations to reference sites for all special-status plants that have the potential to occur on the Project site prior to the start of construction. Multiple survey seasons may be needed. Surveys should be conducted following *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*, prepared by CDFW, dated March 20, 2018. The protocol can be found here: <https://www.wildlife.ca.gov/Conservation/SurveyProtocols#377281280-plants>. If special-status plants are found during surveys, the IS/MND shall outline which species of special-status plants will be impacted and how the Project would be re-designed to avoid, minimize and/or mitigate impacts to those special-status plants.

Results of the updated botanical surveys should be included in a revised IS/MND to ensure that all impacts to rare plants and/or rare vegetation communities are disclosed and can be mitigated to a level of less-than-significant. Any positive detections of special-status plant species found as a result of Project surveys should be submitted to the CNDDDB within 30 days of survey completion.

COMMENT 3: Migratory Birds and Nesting Raptors

Issue: The IS/MND acknowledges there is foraging bird habitat and potential nesting habitat on adjacent parcels that may be impacted by Project disturbance. The IS/MND indicates site disturbance may occur during the nesting bird season (February 1 through August 31). Avoidance and minimization measure BIO-2 specifies a Qualified Biologist shall conduct a habitat assessment and pre-construction nesting bird and ground nesting species no more than seven (7) days prior to initiation of work and that buffer distance requirements would be species-dependent as determined by the Qualified Biologist. CDFW agrees with the implementation of these measures. However, CDFW has additional recommendations related to Qualified Biologist authority and raptor behavior.

Recommendations: In addition to the measure BIO-2 language included, CDFW recommends specifying that a Qualified Biologist, experienced in raptor behavior, be assigned to monitor the behavior of any raptors nesting within disturbance distance of Project activities. Even within species, disturbance distances can vary according to time of year or geographical location. The Qualified Biologist shall have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the

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birds exhibit abnormal nesting behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young). Abnormal nesting behaviors which may cause reproductive harm include but are not limited to; defensive flights/vocalizations directed towards Project personnel, standing up from a brooding position, interrupted feeding patterns, and flying away from the nest. Project activities within line of sight of the nest should not resume until the Qualified Biologist has consulted with CDFW and both the Qualified Biologist and CDFW confirm that the bird's behavior has normalized, or the young have left the nest.

COMMENT 4: Western Burrowing Owl

Issue: The IS/MND notes that burrowing owl have potential to occur on-site or in the surrounding area but were not present in surveys conducted January 6 and November 30, 2019. According to CNDDDB, the Project site is within predicted burrowing owl habitat and burrowing owl have been documented approximately six miles from the Project site (CNDDDB Accessed May 2024). The Project site contains connected grassland with ruderal grasses considered suitable burrowing owl habitat. Please be advised that preconstruction/reconnaissance surveys alone are inadequate to determine impacts to western burrowing owl and their habitat. Burrowing owl may use unnatural features such as debris piles, culverts, and pipes for nesting, roosting or cover. Without additional burrowing owl habitat impact assessment and potentially incorporation of additional burrowing owl protective measures, the Project has the potential to result in injury or mortality to adult or juvenile owls, or cause nest abandonment. CDFW considers such impacts to western burrowing owl to be significant.

Evidence the Impact Would be Significant: Burrowing owl are a California SSC due to population decline and breeding range retraction. Recently, the California Fish and Game Commission has been petitioned to list populations of burrowing owl as endangered or threatened due to precipitous population declines and local extirpations of the species (Center for Biological Diversity et al. 2024). Burrows and burrow surrogates protect against predators and harsh weather conditions during the winter season.

Recommendations: The IS/MND should further evaluate whether the parcel contains suitable burrowing habitat for western burrowing owl. Prior to Project activities, a habitat assessment should be performed following Appendix C (Habitat Assessment and Reporting Details) of the CDFW Staff Report on Burrowing Owl Mitigation (2012 CDFW Staff Report), which is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>. The habitat assessment should extend at least 150 meters (492 feet) from the Project site boundary and include burrows and burrow surrogates. If suitable burrowing owl habitat is determined to be present, CDFW recommends that surveys be conducted following the methodology described in Appendix D (Breeding and Non-breeding Season Surveys) of the 2012 CDFW Staff Report.

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Burrowing owl surveys should be conducted by a qualified CDFW-approved biologist. In accordance with the Staff Report, a minimum of four survey visits should be conducted within 500 feet of the Project area during the owl breeding season which is typically between February 1 and August 31. A minimum of three survey visits, at least three weeks apart, should be conducted during the peak nesting period, which is between April 15 and July 15, with at least one visit after June 15. Pre-construction surveys should be conducted no-less-than 14 days prior to the start of construction activities with a final survey conducted within 24 hours prior to ground disturbance.

Please be advised that CDFW does not consider exclusion of burrowing owl or “passive relocation” as a “take” avoidance, minimization, or mitigation method, and considers exclusion as a significant impact. The long-term demographic consequences of exclusion techniques have not been thoroughly evaluated, and the survival rate of evicted or excluded owls is unknown. All possible avoidance and minimization measures should be considered before temporary or permanent exclusion and closure of burrows is implemented in order to avoid “take”.

The CEQA document for the Project should also include measures to avoid or minimize loss of burrowing owl foraging habitat, and mitigation for loss of habitat that cannot be fully avoided. The EACCS Mitigation Guidance (p. 3-66) for burrowing owl recommends mitigating the loss of habitat by protecting habitat in accordance with the mitigation guidelines outlined in Table 3-10 (BUOW-3) through acquiring parcels, through fee title purchase or conservation easement, where known nesting sites occur or where nesting sites have occurred in the previous three nesting seasons (BUOW-1 and BUOW-2). Additionally, the Project applicant could work with the Implementation Committee to fund the implementation of an annual monitoring program in coordination with local conservation groups on all burrowing owl nest colonies on protected lands using monitoring protocols established by the California Burrowing Owl Consortium (1997). The results of these surveys would be submitted to the CNDDDB and the Conservation Strategy database (BUOW-4 and BUOW-5). This would allow for informed avoidance of impacts in the future.

COMMENT 5: Bats

Issue: The IS/MND states that bats have the potential to roost in eucalyptus trees approximately 300 feet from the Project site. However, Mitigation Measure BIO-3 only recommends a bat roost assessment of trees and structures within 100 feet of the Project site. Project construction could result in disturbance of roosting bats. Project activities that may disturb the bats include noise associated with construction equipment and generators; lighting from nighttime activities; and impacts to foraging habitat. These activities have the potential to disturb bats as they roost in the barn or nearby trees, or when they forage, resulting in avoiding foraging or roosting sites, abandoning the roost

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or young (which may lead to mortality), and other impacts such as reduction in reproductive success, risk of predation, and reduction of prey.

Evidence the impact would be significant: Noise and night lighting can disrupt the circadian rhythms of many species. Many wildlife species use photoperiod cues for communication (e.g., bird song; Miller 2006), determining when to begin foraging (Stone et al. 2009), behavior thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004).

Recommendations to minimize significant impacts: If ground-disturbing activities occur during the bat maternity season (April through July), a qualified bat biologist should assess all trees within 300 feet of the Project area to determine if they contain suitable bat roosting habitat (e.g., cavities, crevices, deep bark fissures). If any trees contain such habitat, bat presence shall be presumed. If the biologist determines there is potential for maternity roosting bats to be present within 300 feet of the Project site, nighttime emergence surveys shall be performed to determine if maternity roosting bats are present. If bat maternity roosts are present, the biologist shall establish an appropriate exclusion zone around the maternity roost. Once the biologist has determined that all young have become independent of the roost, construction may take place in the former exclusion zone.

COMMENT 6: American Badger

Issue: The IS/MND does not discuss the potential for encountering American badger on the Project site. However, this Project is within the range of the American badger and includes grassland habitat that may be suitable for American badger.

Evidence of Significant Impacts: Badgers range throughout most of California and can dig burrows in a single day; therefore, the species may occupy the Project site and adjacent habitat prior to Project construction (Brehme et al. 2015).

Recommendations: CDFW recommends the IS/MND further analyze the potential for American badger to occur on and adjacent to the Project site; and include mitigation measures to ensure impacts are reduced to less-than-significant. These measures may include a Qualified Biologist surveying for the species including adjacent habitat prior to construction, avoiding occupied burrows including a sufficient buffer approved by CDFW, and preparing and implementing a CDFW-approved relocation plan if badgers are found on or adjacent to the Project site.

COMMENT 7: Fencing Hazards

Issue: The Project may result in the use of open pipes used as fence posts, property line stakes, signs, etc. These structures mimic the natural cavities preferred by various

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bird species and other wildlife for shelter, nesting, and roosting. Raptor's talons can become entrapped within the bolt holes of metal fence stakes resulting in mortality.

Recommendations: CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the Project site should be plugged with bolts or other plugging materials to avoid this hazard. Further information on this subject may be found at:

<https://ca.audubon.org/conservation/protect-birds-danger-open-pipes>.

COMMENT 8: Water Use and Cumulative Impacts

Issue: CDFW commends the Project proponent for including a rainwater capture system to collect rainwater from Project building infrastructure. However, two existing domestic wells on-site may be used as “backup” for cannabis irrigation and it is unclear if diversion from those wells could cause or contribute to significant impacts to groundwater and impact biological resources that depend on groundwater availability. Increased water use may lower the groundwater table, which could eliminate flows or flow duration in streams, such as the close by Middle Americano Creek. Lowering of the water table may reduce water availability for fish and wildlife. It is also unclear how the Project well may interact with surface water resources.

Evidence of Significant Impacts: Cannabis cultivation is often associated with a significant water demand. Cannabis cultivation requires an average of one gallon of water per day per pound of cannabis produced or six gallons per plant per day (Bauer et al., 2015). Discussion of cumulative impacts is required by CEQA Guidelines section 15130, which also includes “past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency....” Increased water use may result in diminishing the biological diversity in watersheds. Increased water diversions and alterations to rivers’ hydrogeomorphology could affect the riparian corridor, and change sedimentation, nutrient loading, water quality, and water availability (Naiman et al. 1993, 2000). The Project could also substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted). Therefore, CDFW is concerned cumulative impacts from this and future projects in the County on biological resources similar to the proposed Project may be considerable, as defined in CEQA Guidelines section 15065(a)(3) and 15064(h)(1).

Recommendations: The IS/MND should provide additional information about Project use of the two “backup” existing cannabis irrigation wells including well diversion timing, frequency, rate, and volume. As part of the IS/MND, all Project wells should be evaluated

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by a qualified professional such as a hydrologist to determine the relationship of surface water interaction and potential for subterranean stream diversion or streamflow depletion. Wells should be evaluated under the CEQA review process to determine their potential for stream water depletion that may adversely affect fish and aquatic life.

Additionally, the IS/MND should provide a robust analysis of cumulative impacts to water sources (i.e., local groundwater) based on this Project and other past, and future projects. Based on results of additional well diversion assessments to groundwater resources, the Project IS/MND should incorporate additional groundwater extraction/recharge measures. Measures should be sufficient to ensure that the Project's use of groundwater will not further result in subsidence of the groundwater table or impacts to surface water flow in Middle Americano Creek. For example, seasonally limiting use of the Project well and/or limiting the rates of water extraction may be necessary to avoid and/or minimize impacts to groundwater levels. To verify Project measures the County should require the Project to monitor and report water usage and water depths over time from all Project wells for the life of the Project. If diversion from the existing or new well could result in substantial diversion of streamflow, the diversion would be subject to Fish and Game Code section 1602 and should be included as part of a complete Project LSA notification.

REGULATORY REQUIREMENTS

Lake and Streambed Alteration Agreement

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the IS/MND and complied with its responsibilities as a responsible agency under CEQA.

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue,

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catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065). In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

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 found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data#44524420-pdf-field-survey-form>. 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://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 filing fees is necessary. Fees are payable upon filing of the Notice of Determination

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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. (See: 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 IS/MND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions and coordination pertaining to this letter should be directed to Emily Galli, Environmental Scientist, at (707) 210-4531 or Emily.Galli@wildlife.ca.gov; or Wes Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024040916)

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REFERENCES

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