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GAVIN NEWSOM, Governor  
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Governor's Office of Planning & Research

February 4, 2020

**FEB 04 2020**

## STATE CLEARINGHOUSE

Ms. Sonia Urzua, Planner  
Alameda County Community Development Department  
224 West Winton, Room 111  
Hayward, CA 94544  
[sonia.urzua@acgov.org](mailto:sonia.urzua@acgov.org)

Subject: Oasis Fund Livermore Grow Facility, SCH #2019129080, Mitigated Negative Declaration, Alameda County

Dear Ms. Urzua:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration from Alameda County (County) for the Oasis Fund Livermore Grow Facility Project (Project) pursuant the California Environmental Quality Act (CEQA). The public review period was from December 23, 2019 to January 21, 2020; however, the County indicated in a telephone conversation dated January 29, 2020 that that the comment period was extended until February 7, 2020.

CDFW is therefore submitting comments on the Initial Study/Mitigated Negative Declaration (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 and Game Code, § 1802), and/or which are required to be approved by CDFW (CEQA Guidelines, §§ 15086, 15096 and 15204).

### CDFW ROLE

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the State's fish and wildlife trust resources.

### REGULATORY REQUIREMENTS

#### *California Endangered Species Act*

Please be advised that a CESA Permit must be obtained 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. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a 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 restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c), 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

#### *Lake and Streambed Alteration*

Pursuant to Business and Professions Code 26060 1(b)(3) every license for cultivation issued by the California Department of Food and Agriculture (CDFA) must comply with Section 1602 of the Fish and Game Code or receive written verification from CDFW that an LSA Agreement is not required. Therefore, for any such activities, (including construction for the purpose of cannabis cultivation), the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use or deposit material from a streambed. Based on this notification and other information, CDFW determines whether an LSA Agreement with the applicant is required prior to conducting the proposed activities. The notification process for cannabis cultivation projects is described on CDFW's website at <https://wildlife.ca.gov/Conservation/Cannabis>.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** Felix Kukushkin, Oasis Venture LLC

**Description and Location:** The Project consists of the development of a 32,000-square-foot (sf) greenhouse building containing approximately 22,000 sf of a cannabis canopy, as well as a 5,040-sf processing building and 26 paved parking stalls. The processing building would house product processing facilities such as dry rooms, trim room, storage room, office, maintenance and the employee areas within the 98.11-acre property (Project Area) located at 7033 Morgan Territory Road in Alameda County. The proposed Project includes the installation of landscaping around the perimeter of the Project site, installation of a leach field, bio-retention basin, and use of either new or existing wells.

The Project Area consists of mowed annual grassland and one residential housing unit. Mixed riparian woodland exists along Cayetano Creek on the western boundary of the area

## **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.



#### *East Alameda County Conservation Strategy*

The IS/MND provides no mention of the East Alameda County Conservation Strategy (EACCS). The EACCS (2010) provides a baseline inventory of biological resources and conservation priorities to be utilized by local agencies and resource agencies during project-level planning and environmental permitting. It was designed to convey project-level permitting and environmental compliance of the federal and state endangered species acts, CEQA, the National Environmental Policy Act, and other applicable laws for all projects within the study area with impacts on biological resources. The EACCS was a joint effort including, but not limited to, the cities of Pleasanton, Dublin, and Livermore; Zone 7, Alameda County, East Bay Regional Park District, U.S. Fish and Wildlife Service (USFWS) and CDFW. The EACCS is intended support and streamline the permitting process. EACCS does not create new regulations or change the process by which a project applicant obtains permits for authorization to impact biological resources, but it has, in fact, been accepted as a guidance document by several agencies including USFWS and CDFW.

Several of the species potentially impacted by this Project are included as focal species in the EACCS, such as California tiger salamander (*Ambystoma californiense*), California red-legged frog (*Rana draytonii*), western burrowing owl (*Athene cunicularia*), and American badger (*Taxidea taxus*). None of the biological mitigation measures in the IS/MND require mitigation in the form of habitat conservation despite acknowledging there are several special-status species that may be present in the Project Area. The EACCS mitigation guidance sections (Chapter 3), for grassland, California tiger salamander, western burrowing owl, California red-legged frog, and American badger all include mitigation in the form of habitat conservation, for the loss of species habitat when it cannot be avoided. To be consistent with the EACCS and to offset permanent habitat loss or conversion, the IS/MND should include permanent habitat conservation as an enforceable mitigation measure.

#### *Migratory Birds and Nesting Raptors*

The IS/MND, p. 32 acknowledges there is habitat for migratory birds and nesting raptors. The IS/MND, p. 33 states no trees will be removed as part of the Project yet Mitigation Measure IV-3(a) recommends tree removal occur outside of the nesting season. Please clarify whether tree removal is part of the Project. If trees are proposed to be removed, the County should require additional mitigation, such as replacement planting with monitoring and success criteria.

#### Nesting Birds

Avoidance and minimization measure IV-3(a), p. 36, specifies a 250-foot construction buffer for nesting birds and raptors. Depending on the species, nest stage, and site conditions, these distances may not be sufficient to prevent disturbance-related nest failure and subsequent take. The Project proponent is responsible for ensuring that the Project does not result in any violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes. If work will occur during nesting bird season (February 1 through August 31) no more than fourteen (14) days prior to work commencing, including staging, clearing and grubbing, a qualified biologist should survey a sufficient area around the Project site to identify any nests that are present and determine their status and an appropriate buffer. Once construction work begins, the survey effort should continue to identify any nest starts established after the work commences. 'Sufficient' in this context means any nest within an area that could potentially be affected by the Project. In addition to direct impacts, such as nest destruction, nesting birds might be affected

by noise, vibration, odors, lighting, and movement of workers or equipment. Identified active nests should be surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline of the adults and any nestlings. Once work commences, all active nests should continue to be monitored by the qualified biologist to detect any signs of disturbance and behavioral changes as a result of the Project. If signs of disturbance and behavioral changes are observed, the biologist should reassess the appropriate buffer to prevent disturbance-related nest failure and subsequent take.

#### Raptor Nests.

A qualified biologist, experienced in raptor behavior, should 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 should have authority to order the cessation of all Project activities within disturbance distance of any raptor nest if the 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.

#### Western Burrowing Owl

The IS/MND p. 36 and Appendix B p. 28 acknowledges burrowing owls could be present on-site or in the surrounding area, and construction activities could cause loss of habitat or abandonment of active nests. The IS/MND recommends pre-construction surveys no more than 14 days prior to construction and 250-foot buffers if burrowing owls are found in the Project area. Please be advised that pre-construction surveys alone are inadequate to determine impacts to western burrowing owl and their habitat.

Based on our records, burrowing owls have been documented approximately one mile from the Project site. Burrowing owls may also use unnatural features such as debris piles, culverts and pipes for nesting, roosting or cover. Since suitable burrowing owl habitat is present, CDFW recommends that surveys be conducted following the methodology described in Appendix D: Breeding and Non-breeding Season Surveys of the CDFW Staff Report on Burrowing Owl Mitigation (Staff Report), which is available at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843>.

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 owls 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 (1993). The results of these surveys would be submitted to the California Natural Diversity Database (CNDDDB) and the Conservation Strategy database (BUOW-4 and BUOW-5). This would allow for informed avoidance of impacts in the future.

#### Rodenticides

Use of rodenticides at the construction site and cannabis facility should be prohibited. Use of pesticides or rodenticides is also not recommended in areas where raptors are foraging, breeding, or nesting. Second-generation rodenticides such as brodifacoum are used widely in the United States to kill rats and other rodents. Unfortunately, they also kill many raptors, which are attracted to the poisoned rodents as they are in their final stages of death.

#### Amphibians and Reptiles

The IS/MND Mitigation Measure IV-2, p. 35, requires pre-construction surveys for the presence of special-status amphibians and as well as western pond turtle and Alameda whipsnake. The measure requires relocation if any special-status species are found. The second paragraph requires silt fencing to be erected and maintained around the construction zone and trapping and relocation, by a qualified biologist possessing a "valid permit or approved under an active biological opinion" of any amphibians found inside the fenced area. The fourth paragraph states no mitigation is required if no species are found.

#### California Tiger Salamander

Although not mentioned in the IS/MND, the Project site is located within dispersal distance of at least four known and/or potential California tiger salamander breeding ponds. A known California tiger salamander occurrence (CDFW 2020) is less than 0.5 miles to the north along Morgan Territory Road near a stock pond. California tiger salamander are known to be able to travel 1.3 miles from upland habitat to breeding ponds. Given the historical and extant California tiger salamander detections within 1.3 miles of the Project site, and without evidence such as protocol-level presence/negative finding surveys, the IS/MND should assume presence.



California tiger salamanders spend a majority of their lives underground in burrows created by fossorial mammals. Some salamanders migrate to and from breeding ponds on rainy nights during the winter and spring. Based on their life history, it is highly unlikely a salamander would be found during pre-construction surveys unless the surveys included actions such as, burrow excavation, pitfall traps and drift fencing, as authorized under CESA.

Mitigation Measure IV-2 also recommends installing silt fencing (exclusion fence) during construction. Please be advised that installing fencing around the Project site could be a form of "take" if California tiger salamander or other listed species are present. Any action that could cause take of California tiger salamander (such as trapping within an exclusion fence or relocation out of harm's way) must be authorized under appropriate federal and state permits.

The IS/MND as written, does not reduce the impacts to less-than significant levels as required by CEQA. Mitigation measures should include actions such as, preserving off-site habitat through either purchasing California tiger salamander habitat credits at a CDFW-approved conservation bank (see <https://www.wildlife.ca.gov/Conservation/Planning/Banking/Approved-Banks>), or by placing a conservation easement over lands providing habitat, including funding an endowment for managing the lands for the benefit of California tiger salamander in perpetuity, and preparation and implementation of a long-term management plan.

CDFW advises that the Project proponent obtain a CESA Permit (pursuant to Fish and Game Code Section 2080 et seq.) in advance of Project implementation. Issuance of a CESA Permit is subject to CEQA documentation; therefore, the CEQA document should specify impacts; mitigation, and should fully describe a mitigation, monitoring and reporting program. As mentioned above, if the proposed Project will impact any 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. More information on the CESA permitting process and protocol survey procedures can be found on the CDFW website at <https://www.wildlife.ca.gov/Conservation/CESA> or <https://www.wildlife.ca.gov/Conservation/Survey-Protocols>.

#### California red-legged frog

California red-legged frogs can also spend prolonged time in small mammal burrows (D'Amore 2007; Tatarian 2008). USFWS (2010) designates an upper protective buffer limit of one mile. Minimum distances around aquatic habitat should be determined by local known dispersal distances. Activities that will decrease ground squirrel populations, impede movement, or cause take of California red-legged frogs in uplands are advised to also be avoided. CDFW also recommends a qualified biological monitor experienced in the identification and life history of California red-legged frogs be on-site during any removal of existing structures or containers currently in the Project Area. Unless USFWS authorizes relocation, any frogs found on-site must be allowed to leave the area on their own.

#### Foothill yellow-legged frog

The IS/MND p. 32 and the Appendix B identify the Project Area as having suitable habitat for foothill yellow-legged frog (*Rana boylei*). Both documents also identify foothill yellow-legged frog as a Species of Special Concern. CDFW is aware of only two extant populations of foothill yellow-legged frog in Alameda County, located in Alameda Creek and Arroyo Mocho. Foothill

yellow-legged frogs may be extirpated from Contra Costa County; eight of the nine CNDDDB records from the county are museum specimens collected between 1891 and 1953 (CDFW 2019). However, CDFW recommends the IS/MND require a qualified biologist conduct foothill yellow-legged frog surveys using a method approved by CDFW. Survey methodology should target all life stages and should include wet and dry stream surveys. Surveys within the Project Area should include searching cavities under rocks, within vegetation such as sedges and other clumped vegetation, and under undercut banks. Surveys should be conducted at different times of day and under variable weather conditions if possible.

CDFW advises that the Fish and Game Commission has determined that listing of the foothill yellow-legged frog is warranted under CESA as endangered in the West/Central Coast Clade including Alameda County. Presence of foothill yellow legged frogs may require a CESA Permit before Project activities may commence if those activities could cause take.

### *Water*

#### Water Use Inconsistencies

Language in the IS/MND regarding water use is inconsistent. Page 12 states that water will be supplied by four existing wells, and page 57 states that there will be development of a new well. Additionally, page 12 states that the four existing wells cumulatively produce 7 gallons per minute, while page 56 states that the cumulative production is 4 gallons per minute. Page 12 states "The proposed Project is expected to use 2,800 gpd of water for cannabis irrigation, as well as 10,000 gpd for a cooling system and approximately 1,000 gpd for sanitary and processing uses". Page 56 states "Irrigation for cannabis is estimated to require 3,600 gpd year-round... The water demand for pre-irrigation reverse osmosis treatment is 3,000 gpd. Water demand for sanitary uses would be approximately 550 gpd." CDFW recommends using consistent language regarding water use for the cultivation Project.

#### Water Use and Cumulative 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). Given the large water demand for warehouse grows, CDFW is concerned the Project may result in the continued decline of groundwater and the resulting further decline of biological resources that depend on groundwater availability.

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 lower the groundwater table, which could eliminate flows or flow duration in streams, such as the nearby Cayetano Creek, and the occurrence and persistence of wetlands. Lowering of the water table can also take water beyond the root zone for riparian vegetative communities resulting in mortality and decline of vegetation and reductions in wildlife populations. In addition, 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. 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).

CDFW recommends that the IS/MND reveal the locations of the existing and proposed wells, and describe groundwater extraction and recharge measures that will ensure that the Project's use of groundwater will not further result in subsidence of the groundwater table or impacts to riparian vegetation or surface water flow in nearby streams. Additionally, CDFW recommends the IS/MND analyze cumulative impacts to water sources (i.e., local groundwater) based on this, past, and future projects, and that the County require the Project to monitor and report water usage.

#### *Bioretention Basin*

The Project proposes to install a storm drainage system consisting of inlets, an underground vault, and a bioretention basin. Bioretention basins can create an attractive nuisance for both California tiger salamanders and California red-legged frogs. California tiger salamanders and California red-legged frogs have been documented to breed or, attempt to breed, in these basins. This can result in amphibians becoming trapped in the basin or cause desiccation of eggs, larvae or adults. Conversely, the basin could become suitable breeding habitat in an environment where the upland area no longer supports enough suitable habitat to maintain a viable population. The IS/MND should be revised to require that bioretention basins be designed to prevent amphibians from accessing the basin.

#### *Light Pollution*

The Project would generate sources of light near sensitive natural vegetation communities and in an area without significant existing artificial light. The IS/MND does not discuss the type or color of lighting that will be used outdoor, i.e. bright security lighting along the perimeter, white light, blue light, etc.

Sensitive species, wildlife, and their habitats may be adversely affected by increased and artificial night lighting. Light plays a vital role in ecosystems by functioning as both an energy and an information source (Gaston et al. 2012, 2013). The addition of artificial light into a landscape disrupts this role, altering the natural circadian, lunar, and seasonal cycles under which species have evolved. Artificial lights result in direct illumination, altering the natural patterns of light and dark, and sky glow (i.e., scattered light in the atmosphere), which can extend the ecological impacts of light far beyond the light source (Longcore and Rich 2004). On cloudy nights in urban areas, for example, the sky glow effect can be of an equivalent or greater magnitude than high-elevation summer moonlight (Kyba et al. 2013). The addition of artificial light into a landscape can impact a broad range of system processes, including:

- Activity patterns
- Availability and detectability of food resources
- Movement, navigation and migration
- The timing of phenological events



- Physiological functions
- Foraging behavior and predator-prey interactions
- Phototaxis (attraction and movement towards light)
- Circadian rhythms (both physiological and behavioral)
- Causing disorientation, entrapment, and temporary blindness

Further, the lighting materials used in cannabis cultivation can have environmental risks if not disposed of properly as they contain mercury and other toxins (O'Hare et al. 2013). CDFW recommends further discussion of the types of lighting that may be used at the site, and how this lighting may impact local species and the nearby sensitive natural vegetation communities.

To mitigate the potentially negative impacts of artificial light, light structures can be shielded and downward facing so that trespass of light is minimized. In addition, lights can be motion-activated, or turned off or dimmed during critical times of the year (e.g., migration) or during times of night that have the most significant impact on wildlife (i.e. dawn and dusk) (Gaston et al., 2012, 2013). Lights with wildlife-friendly spectral composition (i.e., minimize light avoidance/attraction) can also be used (Sweeney et al. 2011; Gaston et al. 2012, 2013). LED lights are well suited for operating at variable brightness and being switched off or dimmed during certain times of the year or during times of low demand, as they operate at full efficiency and have no "warm-up" time (Gaston et al., 2012, 2013). Vegetation may also be used to shield sensitive areas against light, and light-absorbent surfaces can be used in place of reflective surfaces (Gaston et al., 2012, 2013). In addition, all lights should be disposed of properly, as many contain mercury and other toxins.

#### *Fencing Hazards*

The Project may result in the use of open pipes used as fence posts, property line stakes, signs, etc. CDFW recommends that all hollow posts and pipes be capped to prevent wildlife entrapment and mortality because these structures mimic the natural cavities preferred by various 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. 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>

#### **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://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](mailto: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 by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs., tit. 14, § 753.5; Fish and Game 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 regarding this letter or further coordination should be directed to Ms. Marcia Grefsrud, Environmental Scientist, at (707) 644-2812 or [Marcia.Grefsrud@wildlife.ca.gov](mailto:Marcia.Grefsrud@wildlife.ca.gov); or Ms. Brenda Blinn, Senior Environmental Scientist (Supervisory), at (707) 944-5541. Questions and coordination specific to cannabis cultivation should be directed to Ms. Stephanie Holstege, Environmental Scientist, at (707) 210-5104 or [Stephanie.Holstege@wildlife.ca.gov](mailto:Stephanie.Holstege@wildlife.ca.gov); or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at (707) 576-2786.

Sincerely,



Gregg Erickson  
Regional Manager  
Bay Delta Region

cc: Office of Planning and Research, State Clearinghouse, SCH #2018092012  
Ryan Olah, U.S. Fish and Wildlife Service – [ryan\\_olah@fws.gov](mailto:ryan_olah@fws.gov)

## REFERENCES

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