# State of California Department of Fish and Wildlife

#### Memorandum

Date: May 2, 2023

To: Maxwell Lammert California Department of Transportation District 4; Environmental Planning Post Office Box 24660; MS-8B Oakland, CA 94623 <u>Maxwell.Lammert@dot.ca.gov</u>



DocuSigned by: Erin Chappell

- From: Erin Chappell, Regional Manager California Department of Fish and Wildlife-Bay Delta Region, 2825 Cordelia Road, Suite 100, Fairfield, CA 94534
- Subject: State Route 116 Stage Gulch Road/Lakeville Highway Intersection Safety Project (2Q770), Notice of Availability of an Initial Study with Proposed Negative Declaration, SCH No. 2023040010, Sonoma County

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Availability of an Initial Study with Proposed Negative Declaration (IS/ND) for the State Route 116 Stage Gulch Road – Lakeville Highway Intersection Improvement Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup> CDFW is submitting comments on the IS/ND as a means to inform the California Department of Transportation (Caltrans) as the CEQA Lead Agency, of potentially significant impacts to sensitive resources associated with the proposed Project.

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.).



<sup>&</sup>lt;sup>1</sup> 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.

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.

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# **PROJECT LOCATION AND DESCRIPTION**

Caltrans proposes two build alternatives for the State Route 116 Stage Gulch – Lakeville Highway Intersection Safety Project at Post Mile (PM) 39.3 in Sonoma County. Build Alternative 1 will install traffic signals; Build Alternative 2 will construct a roundabout.

# **Build Alternative 1 – Signalized Intersection**

Build Alternative 1 will add traffic signals on three legs of the intersection. The traffic signal components will include signal and lighting standards, flashing beacons, and controller cabinets. State Route 116 (SR-116) will be realigned and widened under this alternative. The Lakeville Highway northbound approach will be widened to provide a 200-foot-long right-turn lane for vehicles turning east onto SR 116 – Stage Gulch Road. The SR-116 eastbound approach will be widened to extend the existing left-turn pocket for an additional 50 feet for a 150-foot-long pocket. The westbound approach will be reconfigured to provide a single lane for vehicles making left or right turns.

# Stage Gulch Creek Bridge Widening

The Stage Gulch Creek Bridge will be widened by three to five feet on the upstream and downstream sides. The widening will accommodate standard shoulder widths and the additional 50-foot queue length for the SR-116 left-turn lane. The existing bridge rails will be replaced and upgraded to concrete barrier type 836, and 230 feet of retaining wall type 1A will be reconstructed.

# **Drainage Systems**

New drainage systems in the vicinity of the retaining wall will be constructed to accommodate runoff increases from the new construction and the new impervious area of 0.48 acres. Two culverts will be replaced, a ditch will be reconstructed, and existing drainage systems will be modified and reconstructed. The 18-inch alternative pipe culvert parallel to westbound SR-116 will be removed and replaced as part of the new drainage system. The reconstructed retaining wall will require a drainage system to intercept highway runoff in front of the wall. An existing 24-inch culvert and drainage inlet crossing SR-116 northwest of the retaining wall will be replaced in kind. The 18-inch culvert parallel to eastbound SR-116 near will be removed and replaced as part of the new drainage system. No significant increase in runoff volume is anticipated at this location. Storm water retention features (i.e., bio-swales, bio-strips) will be employed as part of the new construction.

# **Electrical Lighting**

Build Alternative 1 proposes the installation of three-legged, fully actuated signals, including three signal mast arms with trenching, three advance warning flashing beacons, controllers, controller cabinets, service equipment enclosures, and lighting. Artificial lighting sources include five new overhead streetlights with light emitting diodes (LED) bulbs and one pre-existing LED streetlight. Light retrofitting with shields to minimize light spillage outside the traveled way and reduced output light intensities will be employed.

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# Ground Disturbance, Planting and Irrigation

Build Alternative 1 will disturb 1.45 acres of soil to achieve widening and realignment. Alternative 1 will not require imported borrow material. Disturbance for grubbing will range from 0 to 4 inches. Excavation depths for tree root removal will range from 1 to 3 feet. Installation of conduit will require excavation of 18 to 30 inches in depth. Lighting standards and flashing beacon foundations will require excavation depths ranging from 6 to 8.5 feet. Signalization pole installation will require an excavation depth of 14 feet. The removal and reconstruction of the retaining wall will require excavation to a depth of 5 feet, and drainage improvements and utility relocations will require excavation to a depth of 3 to 6 feet. To accommodate the right turn lane on the Lakeville Highway northbound approach, mature eucalyptus trees will be removed. Trees will not be replanted on-site. Native and non-native trees at Stage Gulch Creek immediately northwest of the intersection will be impacted by bridge widening. Mature trees on the slope will be affected by retaining wall reconstruction. At this location, excavation to widen the highway an additional 5 feet will damage trees or tree roots and the Lead Agency has chosen to remove the trees. Final tree removal numbers have not been estimated or determined for this alternative.

# **Build Alternative 2 – Roundabout**

Build Alternative 2 is a single-lane roundabout with continuous right-turn bypass lane located 15 feet southeast of the existing intersection. This alternative will construct a roundabout with a 180-foot inscribed circle diameter and a design entry radius of 100 feet at each approach. The roundabout will have a continuous northbound right-turn bypass lane at the south leg of the intersection. The bypass lane will be 200 feet in length and terminate 200 feet past the intersection. Eastbound SR-116 at Stage Gulch Road will be widened for a minimum of 200 feet to accommodate the northbound right-turn bypass lane. There will be single-lane entries for the westbound and eastbound approaches. Build Alternative 2 will include 8-foot-wide shared-use path sidewalks and curb ramps adjacent to the roundabout. Raised islands will separate pedestrians, bicyclists, and vehicular traffic in the roundabout. The inscribed circle diameter of the roundabout would be 180 feet to maintain traffic flow and facilitate the movement of truck traffic.

# **Electrical Lighting**

Build Alternative 2 proposes three advance warning flashing beacons and lighting at the roundabout. Artificial lighting sources include 15 new overhead streetlights with LED bulbs and one preexisting LED streetlight. Lighting will have retrofitting from shields to minimize light spill outside the traveled way and reduced light output intensities will be employed.

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# Ground Disturbance, Planting and Irrigation

Build Alternative 2 will disturb 1.79 acres of soil. Build Alternative 2 will need 1,500 cubic yards of imported borrow materials and require hauling and disposal of 1,500 cubic yards of material during construction. Ground disturbance will include grubbing, grading, and excavation. Depths of disturbance for grubbing and excavation are described in Build Alternative 1. Build Alternative 1 will remove 18 mature eucalyptus trees along northbound Lakeville Highway, replanting will not occur on-site.

# **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 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 final Negative Declaration (ND) and complied with its responsibilities as a Responsible Agency under CEQA.

# Fish and Game Code 5901

Except as otherwise provided in this code, it is unlawful to construct or maintain in any stream in Districts 1, 1 3/8, 1 1/2, 1 7/8, 2, 2 1/4, 2 1/2, 2 3/4, 3, 3 1/2, 4, 4 1/8, 4 1/2, 4 3/4, 11, 12, 13, 23, and 25, any device or contrivance that prevents, impedes, or tends to prevent or impede, the passing of fish up and down stream. Fish are defined as a wild fish, mollusk, crustacean, invertebrate, amphibian, or part, spawn, or ovum of any of those animals (Fish and Game Code section 45).

# **Fully Protected Species**

Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take, except for collecting these species for necessary scientific research and relocation of a fully protected bird species for the protection of livestock. Take of any fully protected species is prohibited, and CDFW cannot authorize their take in association with a general project except under the provisions of a Natural Communities Conservation Plan (NCCP), 2081.7 or a Memorandum of Understanding for scientific research purposes. "Scientific Research" does not include an action taken as part of specified mitigation for a project, as defined in Section 21065 of the Public Resources 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 SETTING**

Sufficient information for meaningful review regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the ND (CEQA Guidelines, §§ 15125 & 15360). CDFW recommends the ND provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). Fully protected, threatened or endangered, candidate, 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:

Common Name	Scientific Name	Status
California red-legged frog	Rana draytonii	SSC, FT
Red-Tailed Hawk	Buteo jamaicensis	
Red-Shouldered Hawk	Buteo lineautus	
White-tailed kite	Elanus leucurus	FP
Nesting Birds and Nesting Habitat		

Native Amphibian Species			
Central California Coast Steelhead DPS	Oncorhynchus mykiss irideus	FT	
Western pond turtle	Actinemys marmorata	SSC	
Native Fish Species			
Notes: FT = Federally Threatened; SSC = State Species of Special Concern (State); FP = Fully Protected; DPS = Distinct Population Segment			

Habitat descriptions and species profiles should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS). Based on the data and information from the habitat assessment, the CEQA document can then adequately assess which special-status species are likely to occur in the Project vicinity. CDFW recommends that prior to Project implementation surveys be conducted for special-status species noted in this comment letter with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <a href="https://www.wildlife.ca.gov/Conservation/Survey-Protocols">https://www.wildlife.ca.gov/Conservation/Survey-Protocols</a>.

# COMMENTS AND RECOMMENDATIONS

# **COMMENT 1:** Riparian and Tree Stand Removals

**Issue:** The IS/ND does sufficiently disclose or adequately analyze the potentially significant impacts to fish and wildlife resources that may occur from the removal, limbing or trimming of riparian trees and upland tree stands at the Project site. Specifically, Page 2-8 indicates that final tree removal numbers will not be determined until the final design has been developed. Page 2-15 indicates that 18 mature eucalyptus trees will be removed along Northbound Lakeville Highway under Alternative 2 but does not provide tree impact details from the proposed retaining wall or within the riparian corridor. Page 3-7 of the IS/ND indicates a large number of trees will be removed under Alternative 1 but does not provide specific details on the riparian trees or eucalyptus tree stands. Furthermore, the Lead Agency has chosen under both alternatives to not implement avoidance and minimization measures that would reduce the impacts below a level of significance. Specifically, the Lead Agency has determined to not replace the impacted trees on-site, citing safety standards and clear-recovery zone concerns within the right-of-way (ROW).

**Evidence the impact would be significant:** The Project ROW contains riparian and eucalyptus tree stands that provide habitat for a wide range of species. All eucalyptus trees are 25 inches or greater with some reaching 60 inches or greater, diameters at breast height (DBH). It would take decades for replanted trees to reach similar heights and diameters. The removal, limbing or trimming of trees may have a potentially significant impact to fish and wildlife resources by reducing and degrading the quality of habitat for nesting birds, reptiles, amphibians, and invertebrates (McBride, 2014). Riparian areas sustain higher numbers of bird species richness than non-riparian areas (Sabo et. al., 2005). Urbanization and development such as the installation of transportation infrastructure has been shown to decrease species diversity, especially in birds (Sabo et. al., 2005).

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While eucalyptus trees are not native to California, they provide suitable nesting habitat for a variety of bird species that range from songbirds to raptors. Up to 38 species have been identified utilizing eucalyptus trees in California (Robertson, 1931). One population of red-shouldered hawk in Santa Clara Valley has shown to benefit from eucalyptus because they are large sturdy trees that provide the best nest sites (Rottenborn, 1999). 14 of 27 nests in 1994 and 38 of 58 nests in 1995 were exotic trees predominantly eucalyptus (Rottenborn, 1999) where red-shoulder hawk nesting occurred. Nesting and fledging success were also higher in exotic trees than in native trees in both years of the study (Rottenborn, 1999). Eucalyptus also provide a host of ecosystem services including carbon sequestration, slope stabilization and diverse wildlife habitat. Therefore, the removal of riparian and mature tree stands will result in potentially immitigable significant impacts to fish and wildlife resources if additional Project avoidance measures are not incorporated into the Project as conditions of approval. Red-shouldered hawks, red-tail and white-tailed kites (State Fully Protected) are known to inhabit the Project vicinity and removal of tree stands could potentially impact nests, nesting behavior and foraging habitat.

**Recommendation:** For both Alternative 1 and Alternative 2; tree numbers, species, common name, DBH, health condition and aerial maps of the trees proposed for impact should be disclosed in the Project CEQA document.

**Recommended Measure 1: On-Site Preservation and Avoidance of Mature Tree Stands:** The Project Development Team (PDT) for the Lead Agency shall develop design alternatives and incorporate principles to significantly reduce the number of trees removed and maximize protecting trees in place. Once trees are selected for preservation on-site, the Lead Agency shall prepare a tree preservation plan that contains specific tree preservation methods. The plan shall set contractor guidelines for tree protection including prominently marking protected areas, erecting barricades around designated trees, tree bumpers; avoidance of vehicular traffic or parking in these restricted areas; and prohibit material storage, grading, and dumping of chemicals and other materials in restricted areas. To ensure compliance, contractors should enable tree preservation bonds to cover potential noncompliance issues, damage, or loss of trees. Recommendation Measure 2: Off-Site Conservation of Riparian Trees and Tree

**Stands:** If impacts cannot be avoided to riparian trees and mature tree stands (15 DBH or greater) the Lead Agency shall permanently preserve riparian tree and tree stands at an off-site location. The off-site location may be lands with habitats that may be rehabilitated, restored, or preserved and maintained to mitigate potentially significant impacts. The lands must be protected through fee title, transfer, or conservation easement to an appropriate conservation entity to ensure long-term preservation and successful implementation of the mitigation. The fish and wildlife resources or environments replaced or substituted for those impacted must be maintained in perpetuity.

**Recommendation Measure 3: Individual Tree Inventory Report:** The updated IS/ND shall include a tree inventory that includes map key information, species name, common name, DBH and overall health status for each individual tree on-site.

**Recommendation Measure 4: On-Site and Off-Site Restoration Plan:** The Lead Agency shall develop a more in-depth restoration plan in consultation with the natural resource agencies to replace Measure PF-BIO-13 of the IS/ND. The Lead Agency shall incorporate details that 1) commits itself to the mitigation, 2) adopts specific performance standards the mitigation will achieve, and 3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard. The Lead Agency shall specifically discuss permanent land protection in perpetuity, mitigation/restoration bank credit purchase and more specific acreage restoration areas and requirements in regard to riparian habitat and tree stands. Additional actions should also be included in the IS/ND, such as installation of artificial wood rat boxes and bat boxes to reduce potentially significant impacts to fish and wildlife resources.

# **COMMENT 2: Fish Passage Assessment and Barrier Remediation**

**Issue:** One six-foot drop on the downstream side of the culvert exists as a total barrier to fish passage within the identified Project limits. Senate Bill 857 (SB-857), which amended Fish and Game Code § 5901 and added § 156 to the Streets and Highways Code states in § 156.3, "For any project using state or federal transportation funds programmed after January 1, 2006, [Caltrans] shall ensure that, if the Project affects a stream crossing on a stream where anadromous fish are, or historically were found, an assessment of potential barriers to fish passage is done prior to commencing Project design. [Caltrans] shall submit the assessment to the [CDFW] and add it to the California Anadromous Fish and Stream Habitat (CALFISH) database. If any structural barrier to passage exists, remediation of the problem shall be designed into the Project by the implementing agency. New projects shall be constructed so that they do not present a barrier to fish passage. When barriers to fish passage are being addressed, plans and projects shall be developed in consultation with the [CDFW]".

**Evidence the impact would be significant:** The Project contains a stream crossing identified as unknown within the California Fish Passage Database. CDFW staff visited

the site on April 18, 2023, and observed a six-foot barrier as part of the existing conditions. The area is also mapped as a historic or current watersheds where anadromous fish are, or historically were found. The species include, but are not limited to, Central California Coast Coho Range (BIOS; DS-804) and Central California Coast Steelhead Range (BIOS; DS-123). The decline of naturally spawning salmon and steelhead trout is primarily a result of the loss of appropriate stream habitat and the inability of fish to get access to habitat, according to reports to the Fish and Game Commission and by CDFW (CDFW, 1998).

**Recommendations:** The Biological Resources section of the IS/ND should be updated to include a fish passage section. The section should discuss the current status of the existing culvert crossing location noted within the Fish Passage Assessment Database (BIOS; DS-69). First pass and or second pass fish assessments, as necessary, and images of the upstream and downstream ends of water conveyance structure should be included in the updated IS/ND.

**Recommended Mitigation Measure 1: Fish Passage Assessment:** Caltrans shall submit an assessment of potential impacts to native fish, amphibian, and other aquatic species with the potential to occur at the Project location to the CDFW and add it to the CALFISH database. If any structural barrier to passage exists, remediation shall be designed into the Project by the implementing agency. New projects shall be constructed so that they do not present a barrier to fish or other aquatic life passage. When passage barriers are being addressed, plans and projects shall be developed in consultation with the CDFW. CDFW shall be engaged prior to design in early coordination and at 30 percent design at minimum.

**Recommended Mitigation Measure 2: Fish Passage Design Coordination:** Caltrans shall engage with CDFW in early and continued coordination before design commences on a potential passage remediation structure. See the CDFW Fish Passage Design Manual for guidance on barrier remediation (CDFW, 2009).

# **COMMENT 3: Light Impact Analysis and Discussion**

**Issue:** Alternative 1 - Lighted Intersection Design; proposes the installation or replacement of 9 light sources that includes 5 new overhead lights, one replacement overhead light and 3 flashing beacons. Alternative 2 – Roundabout Design; proposes the installation or replacement of 19 light sources that includes 15 new overhead lights, one replacement of an existing overhead light and 3 flashing beacons. New lighting, especially in areas where no lighting or low levels of lighting currently exist, has potential for significant impacts to occur that could result in a finding of significance. Artificial light spillage beyond the prism of the roadway into natural areas may result in a potentially significant impacts through substantial degradation of the quality of the environment. Artificial light pollution also has the potential to significantly and adversely affect biological resources and the habitat that supports them. Unlike the natural brightness created by the monthly cycle of the moon, the permanent and continuously

powered lighting fixtures create an unnatural light regime that produces a constant light output. Continuous light output for 365 days a year can also have cumulatively significant impacts on fish and wildlife populations. CDFW appreciates a similar roundabout construction project designed by Caltrans – District 4 on the State Route 12 - State Route 113 Roundabout Project in Solano County was able to reduce impacts to biological resources by using fewer lights than the proposed Project (11 overhead street light sources (six were replacement light sources) to safely illuminate a similar facility).

**Evidence the impact would be significant:** Artificial night lighting can disrupt the circadian rhythms of many wildlife species. Many 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). Artificial night lighting has also been found to impact juvenile salmonid overwintering success by delaying the emergence of salmonids from benthic refugia and reducing their ability to feed during the winter (Contor and Griffith 1995). For nocturnally migrating birds, direct mortality as a result of collisions with anthropogenic structures due to attraction to light (Gauthreux, 2006) is another direct effect of artificial light pollution. There are also more subtle effects, such as disrupted orientation (Poot et al. 2008) and changes in habitat selection (McLaren et al. 2018). There is also growing evidence that light pollution alters behavior at regional scales, with migrants occupying urban centers at higher-than-expected rates as a function of urban illumination (La Sorte et al. 2021). While artificial light pollution can act as an attractant at both regional (La Sorte et al. 2021) and local (Van Doren et al. 2017) scales, there is also evidence of migrating birds avoiding strongly lit areas when selecting critical resting sites needed to rebuild energy stores (McLaren et al. 2018).

**Recommendation:** CDFW recommends no new lighting is installed as a result of the Project to avoid potentially significant impacts to biological resources.

**Recommended Mitigation Measure 1 – Light Output Analysis:** Isolux Diagrams that note current light levels present during pre-Project conditions and the predicted Project light levels that will be created upon completion of the Project shall be included in the IS/ND. If an increase in light output from current levels to the projected future levels is evident additional avoidance, minimization or mitigation shall be developed in coordination with the natural resource agencies to offset indirect impacts to specialstatus species. Within 60 days of Project completion, the Lead Agency shall conduct a ground survey that compares projected future light levels with actual light levels achieved upon completion of the Project through comparison of Isolux diagrams. If an increase from the projected levels to the actual levels is discovered additional avoidance, minimization or mitigation measures may also be required in coordination with the natural resource agencies. This analysis should be conducted across all potential alternatives and compared in table and map format.

**Recommended Mitigation Measure 2 – Light Output Limits:** All LED's or bulbs installed as a result of the Project shall be rated to emit or produce light at or under 2700 kelvin that results in the output of a warm white color spectrum.

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Recommended Mitigation Measure 3 – Reflective Signs and Road Striping: Retroreflectivity of signs and road striping should be implemented throughout the Project to reduce the need for electrical lighting.

Recommended Mitigation Measure 4 – Light Pole Modifications and Shielding: Any new or replacement light poles or sources of illumination shall be installed with the appropriate shielding to avoid excessive light pollution into natural landscapes or aquatic habitat within the Project corridor in coordination with CDFW. In addition, the light pole arm length and mast heights should be modified to site-specific conditions to reduce excessive light spillage into natural landscapes or aquatic habitat within the Project corridor natural landscapes or aquatic habitat within the Project corridor. In areas with sensitive natural landscapes or aquatic habitat the Lead Agency should also analyze and determine if placing the light poles at non-standard intervals has the potential to further reduce the potential for excessive light pollution caused by decreasing the number of light output sources in sensitive areas.

# CONCLUSION

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California's fish and wildlife resources. 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.

Questions regarding this letter or further coordination should be directed to Mr. Robert Stanley, Senior Environmental Scientist (Specialist), at (707) 339-6534 or <u>Robert.Stanley@wildlife.ca.gov</u>; or Mr. Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or <u>Wesley.Stokes@wildlife.ca.gov</u>.

cc: Office of Planning and Research, State Clearinghouse (SCH No. 2023040010)

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# Figure 1. Location Image of Fish Passage Barrier – PM 39.2 on SR-116