

Oct 10 2023**Haggerty, Nicole@Wildlife****STATE CLEARINGHOUSE**

From: Tran, Harvey@Wildlife
Sent: Tuesday, October 10, 2023 2:42 PM
To: engineer@countyofglenn.net; gcboard@countyofglenn.net
Cc: Hosea, Robert@Wildlife; Stanfield, Melissa@Wildlife; Boyd, Ian@Wildlife; Sheya, Tanya@Wildlife; Kilgour, Morgan@Wildlife; Wildlife R2 CEQA
Subject: PT 2023-0325-0000 - County Road 305 over Watson Creek Bridge Replacement Project, Bridge No. 11C-0091- CDFW CEQA Comments

To Donald Rust or to Whom It May Concern:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Initial Study/Mitigated Negative Declaration (ISMND) from Glenn County Public Works Agency for the County Road 305 over Watson Creek Bridge Replacement Project, Bridge No. 11C-0091, Federal Aid No. BRLO-5911(056) (Project) pursuant the California Environmental Quality Act (CEQA) statute and guidelines.

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. (Fish & G. Code, § 1802.) Similarly for purposes of CEQA, CDFW provides, 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 may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration agreement (LSAA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

This Project is located on County Road (CR) 305 at its crossing over Watson Creek in Glenn County, Latitude 39.680283, Longitude -122.530238. The Project proposes to replace the existing bridge with a slightly wider and longer bridge to improve roadway safety, improve hydraulics, and reduce scour potential. The purpose of the proposed Project is to replace a structurally deficient bridge with a new structure that meets current standards and reconstruct the approaching roadway to transition between the new construction and the existing roadway. The new bridge would be a standard two-lane bridge approximately 34 feet wide and 86 feet long. The bridge would have two 12-foot-wide travel lanes with 2-foot-wide shoulders on each side and be located 75 feet to the south of the existing bridge on a new alignment. The bridge structure would consist of a multi-span, continuous reinforced concrete slab on either spread footings or cast-in-drilled-hole (CIDH) piles. Rock slope protection may be placed around the new abutments to protect them from scouring and erosion as well as approximately 50 feet upstream of the bridge to prevent erosion along the creek banks. It is anticipated that the piles for the abutments and/or piers would not exceed 35 feet (approximate) below the existing ground surface. Approximately 875 feet of County Road 305 would be reconstructed. The existing bridge and CR 305 alignment would be used for project access. The existing bridge will be demolished and removed with the channel regraded to match the existing conditions.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist San Joaquin County in adequately identifying and, where appropriate, mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the following items be addressed in the draft CEQA document:

Comment 1: Temporary Water Diversion System, page 7

The draft ISMND states that temporary water diversion will be used during construction and will include a water conveyance pipe that would pass through the upstream cofferdam, the construction site under the new bridge, and exit through the downstream cofferdam. However, there is no mention of whether the temporary water diversion system is also being used for the removal of the existing bridge. Bridge removal is stated on page 8 to involve using a hydraulic ram to demolish the bridge with the channel regraded afterwards. Bridge demolition may result in debris falling into the water and channel regrading cannot occur if water is present. CDFW recommends bridge removal activities and channel regrading be timed when the creek is dry.

To address this comment, CDFW recommends that the draft ISMND clarify whether a temporary water diversion system will also be used to dewater the construction area where the existing bridge will be removed or whether those activities will be limited to when the creek is not flowing, and the Project area is dry.

Comment 2: IV(a). Less Than Significant with Mitigation Incorporated, Foothill yellow-legged frog (FYLF), page 20.

The draft ISMND lists special status species that have potential to be present within the Project area and its vicinity. One species that is absent from that list is foothill yellow-legged frog (FYLF) (*Rana boylei*) which is a state species of special concern in the North Coast DPS. The Project area contains stream habitat with shallow, slow flowing water with some rocky substrate which is potential habitat for FYLF. The banks of the stream include both exposed sunny areas for FYLF to bask and vegetation nearby providing shade and cover. The California Natural Diversity Database shows an occurrence of FYLF in the Project area from 1994. There is a moderate chance that the frog may be present within the Project area or its vicinity during construction.

To address this comment, CDFW recommends that the draft ISMND include FYLF as a species with potential habitat within the Biological Study Area (BSA). In addition, the draft ISMND should describe the Project impacts to the species and the mitigation measures to be implemented to avoid, minimize, mitigate the impacts to the species. Additional information should be incorporated into the appropriate ISMND section(s). An example measure is provided below:

"Project proponent shall retain a qualified biologist to survey the Project area if suitable aquatic breeding and/or upland habitat features occurs for the foothill yellow-legged frog (FYLF), its egg masses, and its larval stages. Surveys shall be performed no more than 3-5 calendar days prior to starting Project activities and shall be performed within 500 feet upstream and downstream of the Project area that can be accessed by the Project proponent. If FYLF, its egg masses, or its larval stages are identified during surveys or during Project activities at or within 50 feet of the Project area, Project proponent should allow FYLF to leave the Project area unharmed and avoid impacts to the egg masses. If Project proponent encounters any FYLF life stages during preconstruction surveys or Project activities, and avoidance cannot be followed, then the qualified biologist should relocate the species out of harm's way in accordance with a FYLF Relocation Plan written by the qualified biologist and approved by CDFW before construction commences."

Comment 3: MITIGATION MEASURE MM-3: White-Tailed Kite and Loggerhead Shrike, page 25.

The draft ISMND includes mitigation measures for the state fully protected species white-tailed kite that do not outline sufficient survey methodology and adequate nest buffer. For the white-tailed kite preconstruction survey, the 250 feet survey range and buffer range are not sufficient ranges to detect the species and avoid impacts to the species as warranted by its fully protected species status. White-tailed kite is known to have a breeding range that averages 0.2 square miles (Henry 1983).

To address this comment, CDFW recommends the draft ISMND incorporate the following language into the appropriate ISMND section(s):

1. If suitable nesting habitat or wintering habitat features are present for the white-tailed kite on or within 1/4 mile of the Project area, then a qualified biologist shall conduct CDFW-approved protocol surveys within a 1/4-mile radius of the Project area no more than seven (7) calendar days prior to the start of construction activities during the nesting season (February 1 - August 31). Surveys shall be conducted during the appropriate time of day to maximize detectability and shall concentrate on suitable nesting structures for the species. If construction activities occur between December 1 through March 31, then the qualified biologist shall survey for white-tailed kite winter roosting activity within 1/4 mile of the Project area.
2. If an active nest is discovered during the survey or during construction, the Project proponent shall immediately halt all construction activities within ¼ mile of the nest and contact CDFW. The minimum 1/4 mile no disturbance buffer around the active nest shall be maintained until the breeding season has ended or until the qualified biologist determines that all young have fledged and are no longer reliant upon the nest or parental care for survival. Construction activities that could affect the foraging or feeding behavior of the nesting white-tailed kites and their young are prohibited. The qualified biologist shall monitor the nest during construction activities occurring to outside the ¼ mile buffer to determine whether those activities are having an adverse impact on the nesting kites. The qualified biologist may increase the no disturbance buffer if construction is impacting the nesting kites. The Project proponent shall also maintain a minimum 1/4 mile no disturbance buffer around active winter roost sites until the overwintering season has ended or the qualified biologist determines that the birds are no longer present.

Comment 4: MITIGATION MEASURE MM-4: Burrowing Owl, pages 25-26.

Some parts of the mitigation measures do not match the recommended measures by CDFW and the California Burrowing Owl Consortium. The ISMND states that preconstruction surveys for burrowing owls will occur within 300 feet of the BSA and that the no disturbance buffer will be 150 feet from occupied burrows during the non-nesting season (September 1- January 31) and 250 feet from occupied burrows during the nesting season (February 1 – August 31). These numbers differ from the 2012 CDFW’s “Staff Report on Burrowing Owl Mitigation” and the 1993 California Burrowing Owl Consortium’s “Burrowing Owl Survey Protocol and Mitigation Guidelines” which state preconstruction surveys should be within 500 feet of the BSA, and no disturbance buffer distances will be based on level of disturbance that could range from 50 meters to 500 meters.

To address this comment, CDFW recommends the following language be incorporated into the ISMND:

“If suitable nesting habitat is present at or within 500 feet of the Project area, the qualified biologist shall conduct CDFW-approved protocol surveys for nesting BUOW no less than fourteen (14) calendar days and no more than thirty (30) calendar days before start of Project activities during the nesting season (February 1 - August 31). If any active BUOW burrows are observed, a minimum 200-meter no disturbance buffer shall be established and maintained around the active burrow. If active nests are found, Permittee shall maintain the no-disturbance buffer until the qualified biologist determines that all young have fledged and are no longer reliant on the nest or parental care for survival. If active BUOW burrows are observed outside of the nesting season, a minimum 50-meter no disturbance buffer shall be established around each occurrence.”

Comment 5: MITIGATION MEASURE MM-5: Western Red Bat, page 26.

The draft ISMND has mitigation measures for the state species of special concern that do not outline sufficient survey methodology and adequate avoidance buffer. For the preconstruction survey, no Project area survey radius was provided. CDFW recommends the ISMND include a minimum survey distance of 500 feet from the Project area. If Western red bats are detected during preconstruction surveys, CDFW should be contacted immediately. Tree removal should not commence until the qualified bat biologist has determined that Western red bats are no longer in the Project area. In addition, tree removal should be limited to either (1) between approximately March 1 and March 31, prior to parturition of pups; or (2) between September 1 and October 31 prior to hibernation (or prior to evening temperatures dropping below 45°F and onset of rainfall greater than ½ inch in 24 hours). Removal of trees containing suitable bat habitat should be conducted under the supervision of a qualified bat biologist.

Structure Roosting Bats

Although the ISMND mentions the potential for bats to roost on the existing bridge structure, neither a bat habitat assessment nor bat survey results were included as part of the ISMND. The existing multi-span structure represents potential nursery roosting habitat for bats. Complete removal of a nursery colony site may have a significant impact on local bat populations. To accurately mitigate potential impacts to nursery sites and roosting bats, the ISMND needs to first identify whether those resources are present within the Project area. CDFW recommends the following be incorporated into the ISMND:

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- Habitat Assessment. A qualified biologist with education and experience in bat biology and identification, shall conduct a habitat assessment for potentially suitable bat habitat on the existing bridge structure no later than six months prior to the start of Project activities. If the habitat assessment reveals suitable bat habitat, then a qualified bat biologist shall do a presence/absence survey during the peak activity periods. At least one survey shall be conducted during the maternity season. If bats are present, then the qualified biologist shall submit a bat avoidance plan to CDFW for review and approval.
- Bat Avoidance Plan. The bat avoidance plan should identify: 1) the location of the-roosting sites; 2) the number of bats present at the time of assessment (count or estimate); 3) species of bats present; 4) the type of roost (e.g., day/night, maternity, hibernaculum, bachelor); and 5) species specific measures to-avoid and minimize impacts to bats. The bat avoidance plan shall evaluate the length of time of disturbance, equipment noise, and type of habitat present at the project.
- No Disturbance Buffer. If during the habitat assessment the qualified bat biologist identifies a bat roost within the Project boundary that is not proposed for demolition or removal, then a no disturbance buffer shall be established around the roost in consultation with CDFW. The width of the buffer shall be determined by the qualified bat biologist based on the bat species, specific site conditions, and level of disturbance. The buffer should be maintained until the qualified bat biologist determines that the roost is no longer occupied.
- Replacement Structures. If the bat roost cannot be avoided, replacement roost structures (bat houses or other structures built into the new bridge structure) shall be designed to accommodate the bat species they are intended for. Replacement roost structures shall be incorporated into the new bridge design in close coordination with the qualified bat biologist. The size of suitable habitat on the existing structure shall be quantified by the bat biologist and a minimum of twice the roosting habitat shall be incorporated into the new bridge design. Roosting habitat structures on the new bridge shall be monitored by a qualified bat biologist for a minimum of two years to document bat use and monitoring reports shall be submitted to CDFW.
- Roost Removal Timing. The project that results in the loss or modification of the original roost structure should be implemented outside hibernation and maternity seasons, Nov 1 – Feb 1 and April 1 – August 31 respectively. Removal of the existing bridge shall not occur until the new roosting habitat is present on the new bridge.
- Bat Exclusion. If an active bat roost is found in a tree or structure that must be removed, the qualified bat biologist shall prepare a Bat Exclusion Plan for the passive exclusion of the bats from the roost. Exclusion shall be scheduled either (1) between March 1 and March 31, prior to parturition of pups; or (2) between September 1 and October 31 prior to hibernation (or prior to evening temperatures dropping below 45°F and onset of rainfall greater than ½ inch in 24 hours). The qualified bat biologist shall confirm the absence of bats prior to the start of construction. The Bat Exclusion Plan shall be submitted to CDFW for review and approval a minimum of 10 days prior to the installation of exclusion devices. CDFW does not support eviction of bats during the maternity or hibernation periods.

- **Preconstruction Survey.** A qualified bat biologist shall conduct a pre-activity roosting bat survey no more than fourteen (14) calendar days prior to the start of Project activities and document the survey results in a report. The survey should at a minimum include a day survey and an evening emergence survey at potential roost structures and trees. The emergence survey should begin forty-five minutes before sunset and continue until two hours after sunset. The report should clearly state whether roosting bats were detected. If bats were observed, the report should include the species of bats, type of roost, and approximate colony size. If bats are observed during pre-activity surveys, a Bat Management and Monitoring Plan should be created to outline methods of Project impact avoidance. If pre-activity surveys had a negative result, the qualified bat biologist should conduct a follow-up bat survey no more than seven (7) calendar days prior to the construction start date, to determine whether bats have moved into or adjacent to the Project area.”

Comment 6: MITIGATION MEASURE MM-6: Migratory Birds and Raptors, pages 26-27.

Please note that it is the Project proponent’s responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests, and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

To address this comment, CDFW recommends the draft ISMND change its avoidance and minimization measures regarding active nests and nesting birds found within the Project area. The ISMND should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project area. One example is nest buffer radius which can be determined by monitoring the active nests and determining the distance that activities will disturb the non-listed nesting birds. While some non-listed birds may tolerate disturbance within 100 feet of construction activities, other birds may have a different disturbance threshold and “take” could occur if the temporary disturbance buffers are not designed to reduce stress to that individual pair. CDFW recommends including performance-based protection measures for avoiding all nests protected under the Migratory Bird Treaty Act and Fish & Game Code. Exclusion buffers may need to be increased based on the non-listed birds’ tolerance level to the disturbance. It is the Project proponent’s responsibility to confirm the buffer is sufficient to avoid take/nest failure.

The ISMND requires a nesting bird survey within 14 days prior to the start of construction, CDFW recommends a final preconstruction survey be required no more than 7 calendar days prior to the start of vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier. Monitoring of potential nesting activities in the Project area should continue, at a minimum, until the end of the avian nesting season (September 1).

Exclusionary devices may be utilized to prevent nesting on existing bridge within the Project area but should be installed before the typical nesting season starts (before February 1), monitored frequently throughout its deployment for any damages or trapped birds, and remain in place until after the typical nesting season is over (after August 31) or until the existing bridge is demolished. Netting poses an entrapment risk to wildlife and should not be used as an exclusion device. CDFW recommends all language referring to netting as an optional exclusion device be removed from the ISMND. CDFW recommends that Project proponent find an alternative method of bird exclusion, like using MEL-ROL on the underside of the bridge to prevent nests from being built.

Comment 7: MITIGATION MEASURE MM-7: Ringtail, page 27.

The draft ISMND has mitigation measures for the state fully protected species that do not outline sufficient survey methodology and adequate avoidance measures. For the preconstruction survey, no Project area radius was provided as was provided with the other special-status species.

To address this comment, CDFW recommends that the draft ISMND provide more details on the survey methodology and mitigation measures that Project proponent may use to detect the presence of the ringtail and avoid impacts to the species. The distance from the Project area that the preconstruction survey will be conducted should be provided as well as well as other protection measures like avoidance buffers instead of being provided later on. An example measure is provided below:

“The qualified biologist shall conduct CDFW-approved protocol surveys for the ringtail at and within 500 feet of the Project area during their natal denning period (March 1 to June 30) no more than three (3) calendar days prior to of the start of Project activities. If any individual of these species or their sign is discovered at or within 500 feet of the Project area during surveys or Project activities, Project proponents shall halt all Project activities or shall not commence Project activities, whichever applies, unless a 500-foot avoidance buffer can be established or until the denning period is past and the species abandon the den. Positive survey results shall be submitted to CDFW.”

Comment 8: MITIGATION MEASURE MM-8: Crotch Bumble Bee, page 27.

The draft ISMND states that “the biological survey was conducted prior to the designation of candidate species for the Crotch bumble bee, and the presence or absence of this species within the BSA could not be determined”. The ISMND also states that annual grassland habitat is present within the BSA which is suitable habitat for the bumble bee. Since the Project is expected to impact the annual grassland, CDFW recommends that a focused survey be done to verify the presence or absence of the bumble bee.

To address this comment, CDFW recommends that the draft ISMND include a more extensive survey for the bumble bee instead of a regular single preconstruction survey. A qualified biologist should conduct no less than two (2) non-lethal surveys no earlier than February 15th, a minimum of three (3) weeks apart, for the presence of Crotch’s bumblebee within suitable over-wintering, nesting, or foraging habitat features and extending 250 feet from the Project area before Project activities commence. Nesting locations and blooming forage plant patches should be flagged for avoidance. A minimum 250-foot avoidance buffer shall be established around any nest location. All nest locations and identified foraging individuals should be mapped onto USGS topographic quad maps and maintained onsite. If Crotch’s bumblebee is identified during the course of any survey or Project activities, Project proponent should immediately notify CDFW by phone and email and halt work until the individual leaves of its own volition and can demonstrate compliance with CESA.

Comment 9: MITIGATION MEASURE MM-9: Riparian Habitat, pages 27-28.

The draft ISMND states that “suitable native trees or shrubs will be planted in areas of disturbed riparian habitat to facilitate the return of the site to preconstruction conditions”. However, no specifics regarding the replanting are provided like how many what species of plants will be installed, what the ratio of planted trees to lost trees is, whether any maintenance and monitoring of the plants would occur. Please note that permanent impacts to Fish & G. Code, § 1602 resources are required to be mitigated at no net loss of habitat and CDFW typically requires through their LSAA at least a 3:1 acre ratio for replacement of permanently impacted riparian habitat which includes removal of any plants that have a diameter breast height of at least four inches.

To address this comment, CDFW recommends that the draft ISMND include more details on the replanting plan to mitigate the permanent impacts to riparian habitat. CDFW recommends the Project proponent develop a Habitat Mitigation and Monitoring Plan which includes, at a minimum, the following:

1. A description of the existing physical conditions of the proposed creation and/or restoration site, including water resources, habitat types, soil composition, and plant species composition, and a map that identifies the location of the site;
2. A habitat comparison of the above (i) to the Project impact site;
3. Documentation of how placing the mitigation on the restoration site is going to maintain or enhance the current ecological and public use values of the land;

4. A plan for the preparation of the restoration site, including the initial removal and subsequent management of nonnative plant species, non-wetland/riparian plant species;
5. A local California native plant palette;
6. A planting plan, including the native riparian species that will be planted on-site, quantity, and location,
7. Monitoring and maintenance measures and a timeline;
8. An irrigation plan;
9. Procedures to ensure that nonnative plants are not introduced or allowed to sustain within the creation or restoration site and a nonnative plant removal plan;
10. Interim performance criteria and adaptive management strategies, as well as success standards with contingency measures if they are not met. Monitoring and maintenance of the restoration site shall be conducted annually for a minimum of five (5) years, or until CDFW determines the mitigation site is successful;
11. Description of what the funding mechanism would be and the breakdown of the individual costs of planting, maintenance, and monitoring activities for the duration of the mitigation (this includes but is not limited to all capital improvements, restoration, enhancement, monitoring, and long-term management and maintenance for at least 5 years or until CDFW determines that mitigation is successful, on all lands), as applicable;
12. Description of how the restoration site will be protected from disturbance, if there are any existing land uses and easements, how the mitigation is consistent with the purpose for which the land was acquired and the funding source used for acquisition, and if there are any risks to the mitigation;
13. Description of the entities involved in the restoration activities and what each of their roles are;
14. Other pertinent information that CDFW requires to evaluate the effectiveness of the mitigation; and
15. Annual reporting to CDFW for at least five years on the status of the success criteria.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

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 & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

Pursuant to Public Resources Code § 21092 and § 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670 or emailed to R2CEQA@wildlife.ca.gov.

CDFW appreciates the opportunity to comment on the ISMND for the Site Approval No. PA-2200144 to assist San Joaquin County in identifying and mitigating Project impacts on biological resources. CDFW personnel are available for consultation regarding biological resources and strategies to minimize and/or mitigate impacts. Questions regarding this letter or further coordination should be directed to Harvey Tran, Senior Environmental Scientist (Specialist) at (916) 358-4035 or Harvey.tran@wildlife.ca.gov or Robert Hosea, Environmental Scientist at (530) 708-1199 or robert.hosea@wildlife.ca.gov.

Literature cited:

Henry, M. E. 1983. "Home range and territoriality in breeding White-tailed Kites". Master's Thesis, San Diego State University, San Diego, CA.

Thank you.

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