



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 **phone**
916.564.4501 **fax**

esassoc.com

California Environmental Quality Act Analysis

date September 17, 2025
to Mike Tietze, East Turlock Subbasin Groundwater Sustainability Agency
from Kelley Sterle, Emily Kline and Meredith Parkin, Environmental Science Associates
subject CEQA Analysis under the Consolidated Final Turlock Subbasin Groundwater Sustainability Plan Program Environmental Impact Report for the Rainbow Farms Land Repurposing Project

Introduction

This document serves as the California Environmental Quality Act (CEQA) analysis to evaluate whether the Rainbow Farms Land Repurposing (proposed project) is within the scope of the Consolidated Final Turlock Subbasin Groundwater Sustainability Plan Program Environmental Impact Report (referred to herein as the GSP PEIR). This analysis considers whether the proposed project activities are consistent with the types of projects and management activities (PM&As) and/or types of impact mechanisms evaluated in the GSP PEIR. If a proposed project is covered by the evaluation of environmental effects in the GSP PEIR and would not result in any new impacts, nor require any new mitigation measures not covered in the GSP PEIR, it may be approved using a finding that the project is within the scope of the GSP PEIR for CEQA compliance, consistent with State CEQA Guidelines Section 15168(c).

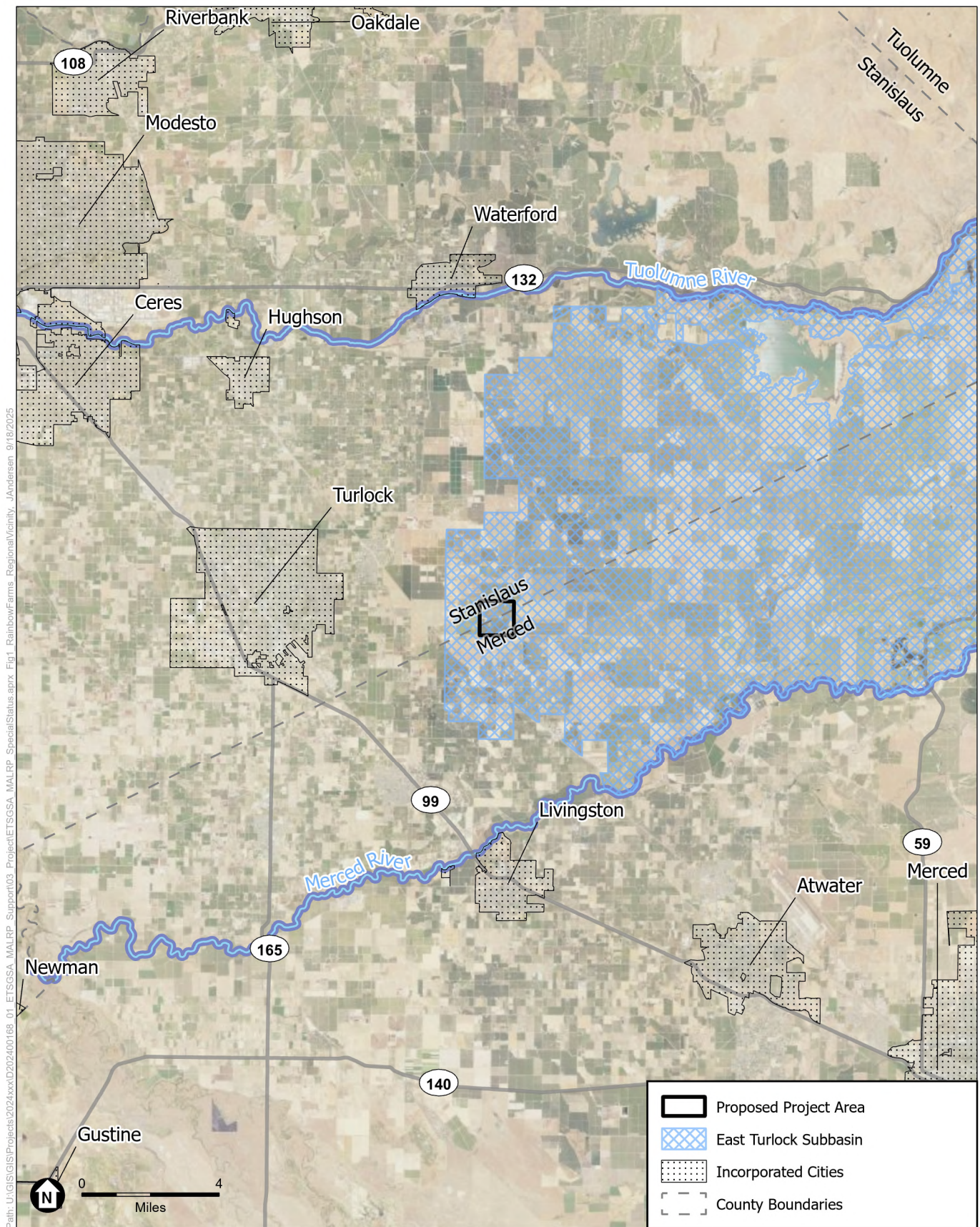
Lead Agency and Project Proponent Information

Lead Agency: East Turlock Subbasin Groundwater Sustainability Agency (ETSGSA)
Project Proponent Name: Rainbow Farms
Contact Person Name: Richard Gemperle
Mailing Address: 10218 Lander Avenue, Turlock, CA 95380
Telephone: (209) 667-2651
Email: rgemperle@gemperle.com

Project Overview

Project Location

The proposed project is located on the Hall Ranch, an approximately 640-acre ranch located in the town of Denair in unincorporated Stanislaus County, California (**Figure 1**). The project parcel APNs are 024-008-012-000, 024-008-013-000, 024-008-005-000, and 041-070-006-000. The proposed project is in the Turlock Subbasin and lies within a subsidence priority action area, as defined by the ETSGSA. Hall Ranch currently uses groundwater accessed through multiple groundwater wells to irrigate almond orchards and supply water to poultry facilities.



SOURCE: NAIP, 2024; ESA, 2025

Figure 1
Regional Vicinity

Project Objectives

The primary objectives of the proposed project are to reduce groundwater demand and promote groundwater recharge through agricultural land repurposing. The proposed project's objectives are consistent with objectives of the Turlock Subbasin GSP which are to achieve the sustainability goal for the Turlock Subbasin by 2042 and avoid undesirable results over the remainder of a 50-year planning horizon.

Project Description

The proposed project involves multiple components to reduce groundwater demand and facilitate groundwater recharge. **Table 1** summarizes the proposed land repurposing areas and associated features, and **Figure 2** depicts these areas and features spatially.

The proposed project would modify the existing drainage gate (approximately 110 feet) along the Turlock Irrigation District's (TID's) Highline Canal to allow for diversion of winter/off-season stormwater and/or in-season replenishment water, when available. Water would be diverted from the Highline Canal through the modified drainage gate to a refurbished drain line (approximately 104 feet) and pumped via existing pumps. The water would be conveyed via a new approximately 1,960-foot conveyance pipeline¹ to a new approximately 2.2-acre basin (Area A) for retention and/or recharge (approximately 10-acre foot capacity) and also to an existing water storage basin. In the Project areas surrounding the constructed Basin area, a total of 4.2 acres (Area B and Area F) will be repurposed using the Extended Multibenefit Fallowing practice which involves crop removal and establishment and maintenance of beneficial cover crops to improve soil health through increased organic matter and improved infiltration. Use of this practice in areas surrounding the Constructed Basin allows for a buffer between the basin and the adjacent non-repurposed orchard lands. The conveyance pipeline would also connect area A to other facilities on the property including an existing artificial pond used for stormwater and irrigation water storage, as well as to connect to reverse tile drain arrays to be constructed in future project phases. A geotechnical investigation² would be conducted to determine the recharge potential for the proposed new retention/recharge basin (Area A).

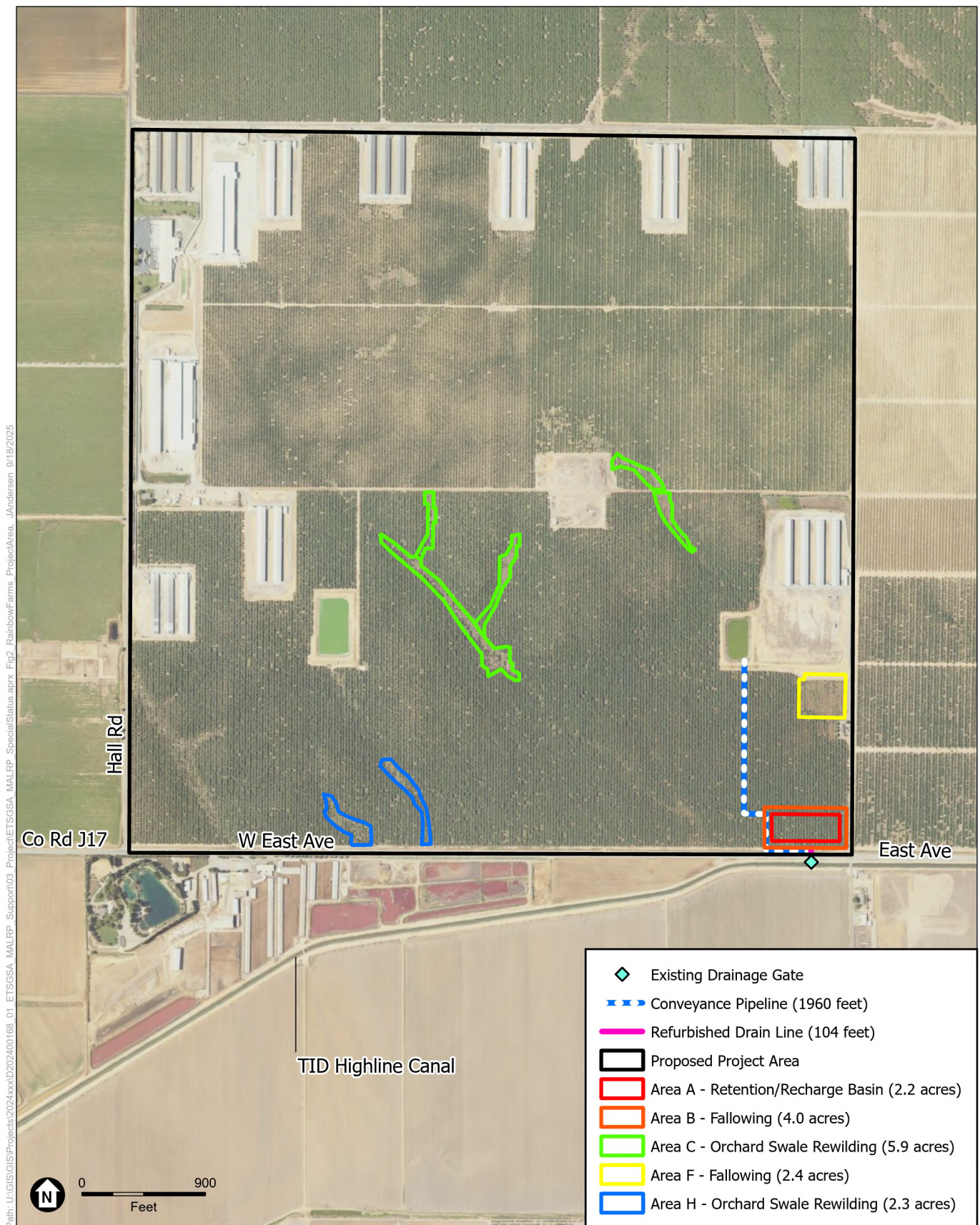
Area C (approximately 5.9 acres) and Area H (approximately 2.3 acres) are currently irrigated orchards located in orchard swales, low-lying areas within orchards that have distinct environmental conditions such as increased soil moisture and lower temperatures and, as a result, often exhibit lower orchard crop productivity. These areas would be fallowed and rewilded via orchard swale rewilding to reduce runoff, temporarily store water, and/or promote deep percolation to groundwater. Area F, totaling approximately 2.4-acres, may be repurposed for direct groundwater recharge as part of future project phases. In total, up to approximately 14.6 acres would be fallowed as part of the proposed project.

¹ The pipeline's maximum instantaneous flow would be 3 cubic feet per second, or 6 acre-feet per day.

² The geotechnical investigation would include non-invasive surface geophysical data collection methods such as the towed time-domain electromagnetic (tTEM) method in which a combination of fixed wire coils and moving electromagnetic probes towed in a small sled behind a 4-wheeler are used to collect data on resistivity of the subsurface which is processed and interpreted into information on the subsurface permeability and stratigraphy.

TABLE 1. PROPOSED LAND REPURPOSING AREAS AND ASSOCIATED FEATURES

Land Repurposing Area or Feature	Current Land Use	Total Acreage or Length (approximate)	Purpose
Drainage Gate	n/a	n/a	Allows for diversion of winter/off-season stormwater and in-season replenishment water from the Highline Canal
Refurbished Drain Line	n/a	104 feet	
Conveyance Pipeline	n/a	1,960 feet	Facilitates conveyance of water from the Highline Canal to Area A
Area A: Retention/Recharge Basin	Irrigated land (orchard)	2.2 acres	Serves as a retention basin (temporary storage of winter stormflows or in-season replenishment water for irrigation use) or a recharge basin, pending the geotechnical investigation of site subsurface characteristics
Area B: Fallow Area Surrounding Area A Basin	Irrigated land (orchard)	4.0 acres	Reduces irrigation demand and provides a buffer between area A and surrounding orchard areas to allow for access and operations
Area C: Orchard Swale Rewilding	Irrigated land (orchard)	5.9 acres	Reduces irrigation demand and provides habitat for wildlife
Area F: Fallowing	Non-cultivated irrigable land	2.4 acres	Extended Multibenefit Fallowing
Area H: Orchard Swale Rewilding	Irrigated land (orchard)	2.3 acres	Reduces irrigation demand and provides habitat for wildlife



SOURCE: NAIP, 2024; ESRI 2025; ESA, 2025

Figure 2
Proposed Project Area

Project Implementation

The proposed project would involve the following construction, maintenance, and monitoring activities to be implemented by the landowners. Note that many of the activities associated with the proposed project already occur under normal agricultural operations and thus are typical of active farming operations that occur in the project area. Based on the existing agricultural operations, it is assumed that the project area as a whole is previously disturbed.

Designate Work Areas, Access and Haul Routes

Prior to the start of project implementation, the work areas would be demarcated. The work areas would be accessed using existing paved and unpaved roads. These existing access routes would also be used for hauling materials and equipment to/from the work areas. Equipment and materials would be staged in the same location as equipment used for existing farming operations.

Modify Drainage Gate at the Highline Canal

The existing 24-inch drainage gate would be modified to meet TID specifications and to allow for diversion of winter/off-season stormflows and/or in-season replenishment water, when available. The existing concrete gate box (measuring 4 feet by 4 feet by 5 feet deep) would be demolished and replaced with a concrete gate box with grate cover (measuring 4 feet by 4 feet by 8 feet deep). The drainage gate would be installed at the base of the Highline Canal to ensure submergence of the intake pipe and check valve. Water from the Highline Canal would be diverted through a refurbished drain line to a pump that lifts the water (up to 15 feet) before conveying it to the new retention/recharge basin (area A).

Remove Orchard Trees

First, orchard trees to be removed in areas B, C, and H would be demarcated. Then, the orchard trees would be removed using an excavator and recycled per whole orchard recycling practices, or disposed of offsite. A grinder/chipper would be used to grind the tree and root material into mulch, then either incorporated into the soil or stockpiled for later use. The existing irrigation system would be removed using hand tools (e.g., shovels, etc.).

Construct Retention/Recharge Basin

Once area B is cleared, the approximately 2.2-acre retention/recharge basin would be constructed. The area would be excavated up to approximately 4.5 feet below ground surface (approximately 10-acre-foot capacity). Excavated material would either be reused on-site or properly disposed of off-site.

Rewild Orchard Swale Areas

Once cleared, areas C and H would be revegetated by seeding and/or planting of suitable vegetative cover such as a commercial pollinator-friendly cover crop (e.g., hedgerows, cover crop, conservation cover, milkweed plugs, etc.). Buffer areas approximately 25 feet in width would be maintained between the adjacent orchards and the rewilded areas to allow for continued operation of farming equipment in the adjacent orchards. If hedgerows are selected, minimal irrigation may be required for establishment.

Construct Conveyance Pipeline

First, the pipeline route connecting from the Highline Canal to retention/recharge basin (area A) would be cleared of any vegetation and irrigation infrastructure. Then, an approximately 1,960-foot long trench would be dug along the proposed pipeline route approximately three feet below ground surface. The new pipeline would be laid, and trench backfilled with the excavated materials. Once installed, the route would be maintained for access to the pipeline and therefore would remain fallowed.

Operations, Monitoring and Maintenance

In general, operations, monitoring and maintenance would be similar to existing activities typical to agricultural practices occurring on the Hall Ranch property. Any new maintenance would be integrated into existing activities. The retention/recharge basin would be periodically monitored to ensure it is properly functioning, with sediment and/or debris removal as necessary. The revegetated areas may be periodically managed through mowing, grazing, and/or crimping, and maintained to control weeds and potential invasive species.

Equipment and Materials

Implementation of the proposed project would involve equipment typically used in agricultural practices, including: backhoes, bulldozers, chippers/grinders, compactors, excavators, graders, haul trucks, loaders, lubricating and fueling trucks (i.e., to support operation of construction equipment), mowing equipment (e.g., weed eaters, commercial lawn mowers), and tractors.

Estimated Project Implementation Schedule

Implementation of the proposed project would begin in 2026 and take approximately three months to complete. Construction would occur outside of nesting bird season (after September 15 and be completed by February 1).

Cultural and Biological Resource Assessments

This section summarizes findings from the cultural and biological resource assessments for the proposed project used to evaluate the potential impacts of the proposed project on cultural, tribal cultural, and biological resources. For additional details, refer to **Appendix A, *Cultural Resources Assessment***, and **Appendix B, *Biological Resources Reconnaissance Survey Report***. Note that in these reports, the proposed project represents one of four potential projects in the Turlock Subbasin evaluated.

Cultural Resources in the Proposed Project Area

Methods

In March 2025, Environmental Science Associates (ESA) Archeologist Robin Hoffman, MA conducted a cultural resources assessment to evaluate the existing conditions of the proposed project area with regard to cultural resources (refer to Appendix A, Map 3 for the area surveyed). The assessment comprised the following: 1) a records search of the California Historical Resources Information System (CHRIS); 2) research on existing cultural resources literature; 3) a review of historic maps and aerial photography; and 4) a desktop geoarchaeological sensitivity analysis of indigenous and historic-era resources. Refer to Appendix A for additional details regarding the methods and sources of data used.

Results

The cultural resources assessment concluded that there are no previously recorded cultural resources in the proposed project area, though no previous cultural resources studies that included field surveys appear to have been conducted in the project area. As presented in Appendix A, there exists a low sensitivity for buried indigenous archaeological resources and a low sensitivity for buried historic-era archaeological resources in the proposed project area. Based on these findings, the assessment does not recommend a cultural resources pedestrian survey be conducted for the proposed project area to verify the presence/absence of cultural resources (both archaeological and architectural).

Biological Resources in the Proposed Project Area

Methods

In April 2025, ESA Biologist Angelica Oregel surveyed for and evaluated biological resources within the proposed project area, focusing on identifying the presence or potential presence of sensitive biological resources regulated by federal or state resource agencies, and the presence of habitat for special-status species that should be considered during CEQA review. The information and analysis focuses on special-status species, wildlife habitat, vegetation communities, and potentially jurisdictional waters of the United States (U.S.) and/or of the state that occurs or has the potential to occur within or in the vicinity of the proposed project area. The assessment included a literature review and database queries as well as a reconnaissance-level field survey. Refer to Appendix B for additional details regarding the methods and sources of data used.

Results

The records search found that several species known to occur in the vicinity of the proposed project area are regulated pursuant to federal and/or state endangered species laws or have been designated as Species of Special Concern by California Department of Fish and Wildlife (CDFW). In addition, Section 15380(b) of the CEQA Guidelines provides a definition of rare, endangered, or threatened species that are not included in any listing. Species recognized under these terms are collectively referred to as “special-status species.” Refer to Appendix B, Attachment C for a map of CNDDDB special-status species occurrences within 5 miles of the proposed project area.

No special-status plants or wildlife were observed during the reconnaissance survey in the proposed project area. However, the proposed project area contained habitat suitable for nesting migratory birds. Potential impacts on nesting birds listed under the Migratory Bird Treaty Act (MBTA) could occur depending on the timing of construction activities; usage of heavy construction equipment can cause impacts to MBTA-protected species if they are operated in close proximity to bird nests, as the increase in noise and vibrations could trigger breeding adults to abandon a nest before it has successfully fledged. However, the project would be implemented outside of nesting bird season (defined as February 1 through September 15) and directly after almond harvest season that typically involves heavy equipment operating within the orchards.

No sensitive natural communities are present with the proposed project area. While several special-status listed wildlife species have known ranges within the Central Valley that may overlap with the proposed project area, the proposed project area does not provide suitable habitat or forage for these species. Therefore, listed special-status wildlife is more likely to be passing through rather than residing within the

proposed project area. A review of the National Wetland Inventory (NWI) did not indicate any water features within and adjacent to the proposed project area, and therefore there are no waters of the U.S. and/or of the state in the proposed project area.

CEQA Analysis

Eligibility of the Project

The proposed project is located within the Turlock Subbasin, the study area evaluated in the GSP PEIR. The proposed project is consistent with the types of PMAs described in Chapter 2, *Description of the Types of Projects and Management Actions to be Implemented under the Turlock Subbasin Groundwater Sustainability Plan*, of the Turlock Subbasin GSP PEIR. As defined in Section 2.2.1, *Projects Identified*, of the GSP PEIR, the term projects generally refers to physically constructed (structural) features that may be designed to recharge the groundwater system using stormwater. The Turlock Subbasin GSP categorizes projects according to their primary recharge mechanism (direct groundwater recharge, in-lieu groundwater recharge, and combination of both). As defined in Section 2.2.2, *Management Actions Identified*, of the GSP PEIR, the term management actions generally refers to nonstructural programs or policies that are designed to incentivize voluntary actions and strategies, such as demand reduction strategies that encourage land fallowing or conservation.

The proposed project involves both construction of features (e.g., tile drains, retention basins,) as well as management actions (e.g., orchard swale rewilding) to recharge the groundwater system and reduce groundwater demand. The proposed project is consistent with the types of projects presented in Table 2-2 of the GSP PEIR (i.e., Group 3, East Turlock Subbasin Agricultural Water Supply Projects).

Implementation of the proposed project involves construction activities consistent with those described in Section 2.3, *Construction Overview for Turlock Subbasin GSP Projects and Management Actions*, and summarized in Table 2-4 of the GSP PEIR. The proposed project would be a combination of direct and in-lieu recharge. Construction for the proposed project would be consistent with the construction activities detailed in Table 2-4 of the GSP PEIR, including the mobilization of equipment and materials, excavation, and drainage modification. Additionally, implementation of the proposed project involves operations and maintenance activities that are consistent with those described in Section 2.4, *Operations and Maintenance Overview for the Turlock Subbasin GSP Projects and Management Actions*, and summarized in Table 2-4 of the GSP PEIR. Operation, maintenance, and monitoring activities associated with the proposed project would be consistent with similar projects outlined in Table 2-4 of the GSP PEIR and include the management of accumulated silt and vegetation from recharge basins, the regularly scheduled inspections and evaluations of feature performance, and monitoring.

Assembly Bill 52 Notifications

Assembly Bill 52 (Chapter 532, Statutes of 2014) amended CEQA to create a separate resource category called “Tribal Cultural Resources” (PRC Section 21074) and to provide that a substantial adverse change in a tribal cultural resource may be a significant effect on the environment (PRC Section 21084.2). State CEQA Guidelines Appendix G was subsequently amended to address tribal cultural resources.

As described in Chapter 1, Introduction, of the GSP PEIR, AB 52 requires lead agencies to notify California Native American tribes that are traditionally and culturally affiliated with the geographic area

of an individual restoration project, if they have requested notice of projects proposed in that area. Upon receipt of the notice, the tribe has 30 days to request consultation. Consultation may involve discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The parties must consult in good faith. Consultation is considered concluded either when the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (if such a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

The requirements under AB 52 and the GSP PEIR Mitigation Measure CUL-2 include outreach to the California Native American Heritage Commission and California Native American Tribes who may be culturally and geographically affiliated with the proposed project area to determine if there are any cultural or tribal resources of which such Tribes may be aware that could be impacted by implementation of the proposed project. Tribal outreach and engagement would occur as part of the Multi-benefit Agricultural Land Repurposing Program (MLRP). Therefore, the ETSGSA did not send additional notifications to contacts at this time.

Environmental Impacts

Table 2 presents the impact analysis of the proposed project, including the resource area, impact statement from the GSP PEIR, whether the impact statement is applicable to the proposed project (yes or no), an explanation, the applicable mitigation measure, and determination of consistency with the GSP PEIR (i.e., whether the proposed project impacts are within the scope of the GSP PEIR because they are consistent with the activities and impacts addressed in the GSP PEIR).). This analysis was used to determine: (1) whether the proposed project would result in any new impacts that were not covered in the GSP PEIR; and (2) whether any of the significant impacts of the PMA would be substantially more severe than those covered in the PEIR.

As indicated in Table 2, the proposed project would result in no new significant effects and/or require no new mitigation measures, and thus the proposed project can be approved as being within the scope analyzed by the GSP PEIR. Therefore, none of the criteria for preparation of a subsequent CEQA document are met (State CEQA Guidelines Sections 15168(c)(2), 15162) and the proposed project would not require new or additional environmental review (e.g., EIR, negative declaration, or mitigated negative declaration).

TABLE 2
IMPACT ANALYSIS OF THE PROPOSED PROJECT

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
Aesthetic and Visual Resources				
AES-1: Implementing PMAs under the Turlock Subbasin GSP could result in substantial degradation of visual qualities.	No	The proposed project involves modifications to an existing drainage gate, orchard tree removal, and construction of a retention/recharge basin. Construction activities are consistent with the typical agricultural operations and therefore would not change the local visual conditions. Once construction is completed, the visual character of the proposed project area would be consistent with existing conditions. Therefore, the proposed project would not degrade visual qualities and there would be no impact.	N/A	Yes
AES-2: Implementing PMAs under the Turlock Subbasin GSP could result in substantial adverse effects on scenic vistas and scenic resources.	No	There are no designated scenic vistas present within or adjacent to the proposed project area. Construction would be short-term and temporary. Construction activities and equipment are consistent with existing conditions and therefore their presence would not cause permanent changes to local visual conditions. Following construction, the visual conditions would be similar to existing conditions. Therefore, there would be no impact.	N/A	Yes
AES-3: Implementing PMAs under the Turlock Subbasin GSP could result in new sources of substantial light or glare.	No	Construction would occur during daylight hours. Operation would not result in new sources of substantial light or glare. Therefore, construction and operation associated with the proposed project would not add new temporary or permanent sources of substantial light or glare, and there would be no impact.	N/A	Yes
Agriculture and Forestry Resources				
AG-1: Implementing PMAs under the Turlock Subbasin GSP could convert Special Designated Farmland to nonagricultural use or conflict with a Williamson Act contract or zoning for agricultural use.	Yes	The proposed project area is located in Farmland of Statewide Importance, Confined Animal Agriculture, and Unique Farmland (DOC, 2025a). With regards to Williamson Act contracts, the northern parcels (APNs 240-08-012-000, 240-08-005-000, and 240-08-013-000) are enrolled as Prime Agricultural Land, while the southern parcel (APN 041-007-006-000) is not enrolled in a Williamson Act Contract (DOC, 2025b). Work for the proposed project would only occur in the southern parcel that is not enrolled in a Williamson Act Contract. The proposed project involves the removal of up to approximately 14.6 acres of orchard trees in swale areas. The trees in these portions of the approximately 640-acre ranch exhibit lower orchard crop productivity and thus have lower values. These areas would be repurposed with native vegetation, cover crop plantings, and retention/recharge basins. The agricultural land that is being converted is being repurposed and would continue to be available and contribute to active agricultural use. Therefore, impacts would be less than significant.	N/A	Yes
AG-2: Implementing PMAs under the Turlock Subbasin GSP could result in other changes in the existing environment that, because of their location or nature, indirectly result in the conversion of Special Designated Farmland to nonagricultural use or conversion of forestland to nonforest use.	No	The proposed project would not result in other changes in the existing environment that would indirectly result in the conversion of Special Designated Farmland to nonagricultural use or conversion of forestland to nonforest use because the proposed project area would continue to be in active agricultural use. Therefore, there would be no impact.	N/A	Yes
Air Quality				

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
AIR-1: Implementing PMAs under the Turlock Subbasin GSP could result in conflict with or obstruct implementation of the applicable air quality plan.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Construction would be short-term and temporary and would be consistent with the types of activities associated with agricultural practices currently occurring in the proposed project area. Therefore, the proposed project would not result in emission levels that would conflict with or obstruct implementation of the San Joaquin Valley Air Pollution Control District (SJVAPCD) air quality plans: 2016 Plan for the 2008 8-Hour Ozone Standard (SJVAPCD, 2016); 2013 Plan for the Revoked 1-Hour Ozone Standard (SJVAPCD, 2013); and 2018 Plan for the 1997, 2006 and 2012 PM2.5 Standards (SJVAPCD, 2018). Once constructed, air pollutant emitting activities (e.g., use of a diesel truck for routine monitoring and maintenance) would be similar to existing conditions. Therefore, impacts would be less than significant.	N/A	Yes
AIR-2: Implementing PMAs under the Turlock Subbasin GSP could result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard.	Yes	The San Joaquin Valley Air Basin (SJVAB) is in nonattainment for the federal standards for ozone (8-hour) and PM2.5 and for the state standards of ozone (1-hour), ozone (8-hour), PM10, and PM2.5. Construction would be short-term and temporary, and once constructed, air pollutant emitting activities (e.g., use of a diesel truck for routine monitoring and maintenance) would be similar to existing conditions. However, excavation activities during construction and fallowed lands in general have the potential to result in criteria pollutant emissions that could exceed SJVAPCD's thresholds of significance (e.g., fugitive dust emissions of PM10 and PM2.5). This could create a significant impact on air quality. Mitigation Measure AIR-2 would require implementation of applicable best management practices (BMPs) to minimize dust from fallowed lands. Even though the scale of the proposed project is small, implementation of this mitigation measure would ensure that the proposed project would not result in a cumulatively considerable net increase of any air pollutant for which the region is non-attainment (e.g., PM10 and PM2.5). Therefore, impacts would be less than significant with mitigation.	Mitigation Measure AIR-2: Minimize Dust from Fallowed Lands	Yes
AIR-3: Implementing PMAs under the Turlock Subbasin GSP could expose sensitive receptors to substantial pollutant concentrations.	Yes	The San Joaquin Valley Air Pollution Control District (SJVAPCD) defines sensitive receptors as "facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants," which include hospitals, schools, convalescent facilities, and residential areas (SJVAPCD 2015). The proposed project is located approximately 500 feet from the nearest rural residential property. However, construction would be short-term and temporary, and would be consistent with the types of activities associated with agricultural practices currently occurring in the proposed project area. Therefore, substantial pollutant concentrations are not anticipated and therefore would not expose sensitive receptors compared to existing conditions. Once constructed, air pollutant emitting activities (e.g., use of a diesel truck for routine monitoring and maintenance) would be similar to existing conditions. Therefore, impacts would be less than significant.	N/A	Yes
AIR-4: Implementing PMAs under the Turlock Subbasin GSP could result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No	The proposed project would not result in other emissions (e.g., odorous emissions) that would adversely affect a substantial number of people. There would be no impact.	N/A	Yes
Biological Resources				

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
BIO-1: Implementing PMAs under the Turlock Subbasin GSP could result in a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Once construction is completed, operations would be similar to existing conditions. In March and April 2025, a biological resources desktop search and reconnaissance-level field survey were conducted to identify the presence or potential presence of sensitive biological resources regulated by federal or state resource agencies, and the presence of habitat for special status species that should be considered during CEQA review. The records search found that several species known to occur in the vicinity of the proposed project area are regulated pursuant to federal and/or state endangered species laws or have been designated as Species of Special Concern by CDFW. As described in Appendix B, no special-status plants or wildlife were observed during the reconnaissance survey in the proposed project area. Furthermore, as described in Appendix B, the proposed project area was determined to not provide suitable habitat for any special-status listed wildlife and no sensitive natural communities were identified in the proposed project area. While the proposed project area contained habitat marginally suitable for nesting migratory birds, project implementation would occur outside of nesting bird season (after September 15 and before February 1) and directly after almond harvest season that typically involves heavy equipment operating within the orchards. Therefore, impacts would be less than significant.	N/A	Yes
BIO-2: Implementing PMAs under the Turlock Subbasin GSP could result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.	Yes	A sensitive natural community is a biological community that is regionally rare, provides important habitat opportunities for wildlife, is structurally complex, or is in other ways of special concern to local, state, or federal agencies. As described in Appendix B, no sensitive natural communities are present in the proposed project area. While some aquatic habitat was observed within the proposed project area, no riparian forest habitat was observed along these features. Therefore, impacts to sensitive natural communities would be less than significant.	N/A	Yes
BIO-3: Implementing PMAs under the Turlock Subbasin GSP could result in a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, and coastal) through direct removal, filling, hydrological interruption, or other means.	Yes	In March and April 2025, a biological resources desktop search and reconnaissance-level field survey was conducted and included an assessment of potentially jurisdictional waters of the U.S. and/or of the state that occurs or has the potential to occur within or in the vicinity of the proposed project area (refer to Appendix B). Results indicated that there was a minimal likelihood for jurisdictional waters to be present in the project area. Therefore, impacts would be less than significant.	N/A	Yes
BIO-4: Implementing PMAs under the Turlock Subbasin GSP could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	Yes	As described in Appendix B, the proposed project area is located within an existing active farming operation and bordered by agricultural orchards with significant human activity. Construction would be short-term and temporary and would not have substantial interference with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. Therefore, impacts would be less than significant.	N/A	Yes
BIO-5: Implementing PMAs under the Turlock Subbasin GSP could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Yes	The proposed project involves the removal of approximately 14.6 acres of orchard trees on private agricultural land. Implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.	N/A	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
BIO-6: Implementing PMAs under the Turlock Subbasin GSP could conflict with the provisions of an adopted HCP, natural community conservation plan, or other approved local, regional, or state HCP.	No	The PG&E San Joaquin Valley Operation & Maintenance Habitat Conservation Plan (O&M HCP) overlaps the entire Turlock Subbasin, including the proposed project area. The activities described in the Turlock Subbasin GSP are not covered activities under the PG&E O&M HCP, which is applicable only to PG&E facilities. Therefore, the proposed project would not conflict with implementation of this HCP, and there would be no impact.	N/A	Yes
Cultural Resources				
CUL-1: Implementing PMAs under the Turlock Subbasin GSP could cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Once construction is completed, operations associated with the proposed project would be consistent with current operations. Removal of a historical or architectural resource as part of project construction would be a significant impact. In March 2025, a cultural resources assessment was conducted to evaluate the existing conditions of the proposed project area with regard to cultural resources. The purpose of the assessment was to inventory and evaluate the potential significance of cultural resources in the proposed project area, including architectural resources. As concluded in Appendix A, the proposed project area has a low sensitivity for buried historic-era archeological resources. Therefore, impacts of the proposed project on historical and architectural resources would be less than significant.	N/A	Yes
CUL-2: Implementing PMAs under the Turlock Subbasin GSP could cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Once construction is completed, operations associated with the proposed project would be consistent with current operations. However, construction of the proposed project could result in potentially significant impacts to archaeological resources. In March 2025, a cultural resources assessment was conducted to evaluate the existing conditions of the proposed project area with regard to cultural resources. The purpose of the assessment was to inventory and evaluate the potential significance of cultural resources in the proposed project area, including archeological resources. As concluded in Appendix A, the proposed project area has a low sensitivity for buried indigenous archaeological resources. Implementation of Mitigation Measure CUL-3 requires the implementation of measures if cultural materials are inadvertently discovered during construction or operation of the proposed project. Therefore, impacts of the proposed project on archaeological resources would be less than significant with mitigation.	Mitigation Measure CUL-3: Implement Measures to Protect Archaeological Resources during Project Construction or Operation.	Yes
CUL-3: Implementing PMAs under the Turlock Subbasin GSP could disturb any human remains, including those interred outside of formal cemeteries.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Once construction is completed, operations associated with the proposed project would be consistent with current operations. The proposed project would occur in a previously cultivated area; however, there could be unknown human remains, the disturbance of which would be a significant impact. Implementation of Mitigation Measure CUL-4 requires the implementation of measures to protect human remains if they are discovered during project construction and operation. Therefore, impacts would be less than significant with mitigation.	Mitigation Measure CUL-4: Implement Measures to Protect Human Remains during Project Construction or Operation.	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
Energy Resources				
ENE-1: Implementing PMAs under the Turlock Subbasin GSP could result in wasteful, inefficient, or unnecessary consumption of energy resources.	Yes	Construction and operation of the proposed project would involve direct energy use through the use of petroleum products and/or electricity to operate construction equipment (e.g., trucks, earthmoving equipment, and power tools). However, energy use would be limited and temporary and would not require the substantial long-term use of energy. Once constructed, operation of the proposed project would be consistent with existing conditions (i.e., existing energy use) associated with current agricultural practices in the proposed project area. Therefore, impacts would be less than significant.	N/A	Yes
ENE-2: Implementing PMAs under the Turlock Subbasin GSP could conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	No	Energy use associated with construction activities would be limited and temporary and would not require the substantial long-term use of energy. Operations would be consistent with existing energy use associated with current agricultural practices occurring in the proposed project area. Therefore, the proposed project would not conflict with a state or local plan for renewable energy or energy efficiency. Therefore, there would be no impact.	N/A	Yes
Geology, Soils, and Paleontological Resources				
GEO-1: Implementing PMAs under the Turlock Subbasin GSP could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.	Yes	Several faults exist in the proposed project area (e.g., Holocene-active Ortigalita and Greenville fault zones, and the pre- Holocene San Joaquin fault). However, the proposed project does not involve the construction of any permanent structures that would be subject to the effects of strong seismic ground shaking in the event of an earthquake. Therefore, impacts would be less than significant.	N/A	Yes
GEO-2: Implementing PMAs under the Turlock Subbasin GSP could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	Yes	The Turlock Subbasin has areas of moderate liquefaction potential. However, the proposed project does not involve the construction of any permanent structures that would be subject to the effects of seismic-related ground failure, including liquefaction. Therefore, impacts would be less than significant.	N/A	Yes
GEO-3: Implementing PMAs under the Turlock Subbasin GSP could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	No	The proposed project is located on previously cultivated agricultural land and has a very low landslide potential as there are no steep slopes or hillsides. Additionally, the proposed project does not involve the construction of any permanent structures that could result in substantial adverse effects. Therefore, impacts would be less than significant.	N/A	Yes
GEO-4: Implementing PMAs under the Turlock Subbasin GSP could result in substantial soil erosion or the loss of topsoil.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. These activities could result in soil erosion and the loss of topsoil but would eventually be repurposed with native vegetation and cover crop plantings that would stabilize the soil. Once construction is completed, operations would be similar to existing conditions. As discussed under HYD-1, because the proposed project would disturb one or more acres during construction, the project proponent would be subject to the requirements of the NPDES General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities (Construction General Permit). The NPDES permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include Best Management Practices (BMPs) designed to control and reduce soil erosion. Therefore, impacts would be less than significant.	N/A	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
GEO-5: Implementing PMAs under the Turlock Subbasin GSP could result in new projects that could be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	No	The proposed project does not involve the construction of any permanent structures that would be located on a geologic unit or soil that is unstable or would become unstable. Therefore, there would be no impact.	N/A	Yes
GEO-6: Implementing PMAs under the Turlock Subbasin GSP could result in new projects that could be located on expansive soils, creating substantial direct or indirect risks to life or property.	No	The proposed project is not located in an area with highly expansive soils exist (NRCS 2025) ³ . Additionally, the proposed project does not involve the construction of any permanent structures. Therefore, there would be no impact.	N/A	Yes
GEO-7: Implementing PMAs under the Turlock Subbasin GSP could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Yes	The proposed project area is located in an area with geological units with a high potential to contain significant paleontological resources. The Pleistocene-age Turlock Lake and Riverbank formations are considered to have a high potential to contain significant paleontological resources. While potentially sensitive formations underly the proposed project area, excavation would not occur at depths of six or more feet (the typical depth where paleontological resources are encountered). Therefore, construction of the proposed project would not be anticipated to directly or indirectly destroy a unique paleontological resource or site, nor would it destroy a unique geologic feature. Therefore, impacts would be less than significant.	N/A	Yes
Greenhouse Gas Emissions				
GHG-1: Implementing PMAs under the Turlock Subbasin GSP could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	Yes	The use of construction equipment would be short-term and temporary and consistent with equipment types currently being used for routine agricultural practices. Once constructed, greenhouse gas (GHG) emission generating activities (e.g., use of a diesel truck for routine maintenance) would be similar to existing conditions. Therefore, the proposed project would not generate GHG emission levels that would have a significant impact on the environment. Therefore, impacts would be less than significant.	N/A	Yes
GHG-2: Implementing PMAs under the Turlock Subbasin GSP could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	Yes	The applicable plan to the proposed project is the California Air Resources Board's (CARB's) 2017 Scoping Plan Update, which describes how the state plans to achieve the 2030 GHG emissions reduction goal for California of 40 percent below 1990 levels by 2030 as mandated by SB 32. As described above in Impact GHG-1, the use of construction equipment would be short-term and temporary and would be consistent with the types of activities associated with agricultural practices currently occurring in the proposed project area. Once constructed, GHG emission generating activities (e.g., use of a diesel truck for routine maintenance) would be similar to existing conditions. Therefore, the proposed project would not generate greenhouse gas (GHG) emission levels that would have a significant impact on the environment. Therefore, the proposed project would not conflict with the applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be less than significant.	N/A	Yes
Hazards and Hazardous Materials				

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
HAZ-1: Implementing PMAs under the Turlock Subbasin GSP could create a significant hazard to the public or the environment through the routine transport, use, disposal, or accidental release of hazardous materials.	Yes	Construction associated with the proposed project may involve the use of minor amounts of hazardous materials (e.g., for equipment maintenance). Any hazardous materials used during operation would be consistent with existing conditions. The use, transportation, and potential storage of hazardous materials would be done in accordance with all federal, state, and local laws. Therefore, impacts would be less than significant.	N/A	Yes
HAZ-2: Implementing PMAs under the Turlock Subbasin GSP could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No	There are no existing or proposed schools located within 0.25 miles of the proposed project area. Therefore, there would be no impact.	N/A	Yes
HAZ-3: PMAs implemented under the Turlock Subbasin GSP could be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.	No	The proposed project would not be located on industrial or commercial property, and the proposed project is not located on a known hazardous materials site. Therefore, there would be no impact.	N/A	Yes
HAZ-4: PMAs implemented under the Turlock Subbasin GSP that could be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, could result in a safety hazard or excessive noise for people residing or working in the area.	No	The proposed project is not located within two miles of an airport. Therefore, there would be no impact.	N/A	Yes
HAZ-5: Implementing PMAs under the Turlock Subbasin GSP could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	No	Implementation of the proposed project would not result in any road closures and therefore would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. There would be no impact.	N/A	Yes
HAZ-6: Implementing PMAs under the Turlock Subbasin GSP could expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	No	The proposed project is not located in an area with a high fire risk. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	N/A	Yes
Hydrology and Water Quality				
HYD-1: Implementing PMAs under the Turlock Subbasin GSP could result in a release of pollutants into surface water and/or groundwater, including in a flood zone as a result of project inundation, that could violate water quality standards or waste discharge requirements, substantially degrade water quality, or conflict with or obstruct implementation of a water quality control plan.	Yes	Construction would involve minor excavation (to remove orchard trees) and earth disturbance (to construct the retention/recharge basin and install the conveyance pipeline). The use of equipment would involve minor amounts of pollutants that, if released, could degrade water quality. This would be a significant impact. Once construction is completed, operations would be similar to existing conditions. The proposed project would disturb one or more acres during construction and therefore the project proponent would be subject to the requirements of the NPDES Construction General Permit. The NPDES permit requires the preparation and implementation of a SWPPP, which would include BMPs designed to reduce pollutant release. Additionally, implementation of mitigation measure HYD-1 would implement water quality protection measures and BMPs. Therefore, impacts would be less than significant with mitigation.	Mitigation Measure HYD-1: Implement Water Quality Protection Measures during Project Construction	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
HYD-2: Implementing PMAs under the Turlock Subbasin GSP could result in substantial alteration of the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.	Yes	Construction associated with the proposed project would involve minor excavation and earth disturbance to remove orchard trees, construct the retention/recharge basin and install the conveyance pipeline. Construction activities would alter the existing drainage patterns, but changes would be short-term and temporary. Once operational, the retention/recharge basin would store and/or infiltrate water to the groundwater system. The long-term effects of the proposed project on drainage patterns and flood flows would be expected to be beneficial or neutral, because the objective of the proposed project is to enhance regional groundwater sustainability, thereby improving on existing conditions. Therefore, while there would be changes in the existing drainage patterns associated with implementation of the proposed project, these changes would not result in substantial erosion or siltation on- or off-site, result in flooding on- or off-site, create or contribute runoff water that would exceed the existing stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant.	N/A	Yes
HYD-3: Implementing PMAs under the Turlock Subbasin GSP could result in substantial alteration of groundwater–surface water interactions.	Yes	The proposed project would not result in substantial alteration of groundwater-surface water interaction. Diversion of water to the retention/recharge basin could result in benefits to the groundwater system. Therefore, impacts would be less than significant.	N/A	Yes
HYD-4: Implementing PMAs under the Turlock Subbasin GSP could result in conflicts with existing water rights (beneficial use and/or point of diversion).	No	The proposed project does not involve a change to existing water rights and therefore would not be expected to result in conflicts with existing water rights. There would be no impact.	N/A	Yes
HYD-5: Implementing PMAs under the Turlock Subbasin GSP could result in substantial alteration to groundwater conditions in adjacent basins.	No	The proposed project is not located in a portion of the Turlock Subbasin that is adjacent to another groundwater basin. Therefore, the proposed project would not be anticipated to alter groundwater conditions in an adjacent basin. There would be no impact.	N/A	Yes
Land Use and Planning				
LU-1: Implementing PMAs under the Turlock Subbasin GSP could conflict with a land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.	Yes	The proposed project involves the removal of up to approximately 14.6 acres of orchard trees in swales that exhibit lower orchard crop productivity. These areas would be repurposed in various ways, including with a retention/recharge basin, native vegetation, and cover crop plantings. The land use would not change and therefore the proposed project would not conflict with a land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect. Therefore, the impact would be less than significant.	N/A	Yes
LU-2: Implementing PMAs under the Turlock Subbasin GSP could physically divide an established community.	No	The proposed project would not physically divide an established community. There would therefore be no impact.	N/A	Yes
Mineral Resources				
MIN-1: Implementing PMAs under the Turlock Subbasin GSP would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.	No	The proposed project would be located on previously cultivated, private agricultural land and would not result in the loss of availability of known mineral resources. There would be no impact.	N/A	Yes
Noise				

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
NOI-1: Implementing PMAs under the Turlock Subbasin GSP could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Yes	The proposed project would use heavy equipment such as excavators and haul trucks. The proposed project would not use pile-driving, nor would the project be located within 100-feet of a sensitive receptor such as a residence, school, or hospital. Construction would occur during normal daylight hours and would be temporary. Noise levels both during construction and operation would be at similar levels to existing conditions. Impacts would be less than significant.	N/A	Yes
NOI-2: Implementing PMAs under the Turlock Subbasin GSP could generate excessive groundborne vibration or groundborne noise levels.	Yes	The proposed project would utilize heavy equipment during construction; however, the equipment is the same as generally used for existing agricultural practice and therefore would generate similar noise and vibrations compared to existing conditions, would be temporary, and would occur during daylight hours. Therefore, impacts would be less than significant.	N/A	Yes
Population and Housing				
POP-1: Implementing PMAs under the Turlock Subbasin GSP could induce substantial unplanned population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	No	The proposed project would not result in population growth in the area. There would be no impact.	N/A	Yes
POP-2: Implementing PMAs under the Turlock Subbasin GSP could result in the displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	No	The proposed project would not result in the displacement of housing. There would be no impact.	N/A	Yes
Recreation				
REC-1: Implementing PMAs under the Turlock Subbasin GSP could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	No	The proposed project would be located on previously cultivated, private agricultural land and therefore would not alter the use of existing neighborhood and regional parks or other recreational facilities. There would be no impact.	N/A	Yes
REC-2: Implementing PMAs under the Turlock Subbasin GSP could include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.	No	The proposed project does not involve recreational facilities or require the construction or expansion of recreational facilities. There would be no impact.	N/A	Yes
Transportation				
TRANS-1: Implementing PMAs under the Turlock Subbasin GSP could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	Yes	The proposed project area would be accessed using existing paved and unpaved roads. Construction and operation activities would not increase traffic on these roads compared to existing conditions. Therefore, the proposed project would not conflict with the existing circulation system. Impacts would be less than significant.	N/A	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
TRANS-2: Implementing PMAs under the Turlock Subbasin GSP could conflict with or be inconsistent with State CEQA Guidelines Section 15064.3(b).	Yes	The proposed project would involve a nominal increase in vehicle miles traveled. The majority of the equipment and materials needed for construction would be sourced on-site (e.g., excavator to remove orchard trees), and once constructed, operations would be similar to existing conditions. Therefore, implementation of the proposed project would not conflict with or be inconsistent with State CEQA Guidelines Section 15064.3(b). Impacts would be less than significant.	N/A	Yes
TRANS-3: Implementing PMAs under the Turlock Subbasin GSP could substantially increase hazards due to a geometric design feature or incompatible uses.	No	The proposed project does not involve changes to existing roads and therefore would not involve creation of any hazards due to a geometric design feature or incompatible uses. Therefore, there would be no impact.	N/A	Yes
TRANS-4: Implementing PMAs under the Turlock Subbasin GSP could result in inadequate emergency access.	Yes	The proposed project is located on private agricultural land. Construction and operation of the proposed project would not result in any road closures or an increase in traffic such that it would result in inadequate emergency access. Therefore, impacts would be less than significant.	N/A	Yes
Tribal Cultural Resources				
TCR-1: Implementing PMAs under the Turlock Subbasin GSP could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in PRC Section 21074.	Yes	Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, in the national, state, or local register of historical resources. Construction would involve minor excavation (to remove orchard trees) and earth disturbance (to construct the retention/recharge basin and install the conveyance pipeline).. Once construction is completed, operations associated with the proposed project would be consistent with current operations. Construction activities could result in adverse changes in the significance of a tribal cultural resource. This would be a potentially significant impact. In March 2025, a cultural resources assessment was conducted to evaluate the existing conditions of the proposed project area with regard to cultural resources. The purpose of the assessment was to inventory and evaluate the potential significance of cultural resources in the proposed project area, including archeological resources. As concluded in Appendix A, the proposed project area has a low sensitivity for buried indigenous archaeological resources. If archeological resources are discovered, implementation of Mitigation Measure CUL-3 would require measures to protect those resources during construction and operation. Implementation of Mitigation Measure CUL-4 would require the implementation of measures to protect human remains if they are discovered during project construction and operation. Therefore, impacts on tribal cultural resources from implementation of the proposed project would be less than significant with mitigation.	Mitigation Measure: Implement Mitigation Measure CUL-3. Mitigation Measure: Implement Mitigation Measure CUL-4.	Yes
Utilities and Service Systems and Public Services				
UTIL-1: Implementing PMAs under the Turlock Subbasin GSP could result in the construction or relocation of new water or expanded water, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	No	The proposed project would not result in the construction or relocation of new water or expanded water, stormwater drainage, electric power, natural gas, or telecommunication facilities.	N/A	Yes

Impact Statement from the GSP PEIR	Does the Impact Apply to the Proposed Project?	Explanation	Applicable Mitigation Measure	Is the Impact within the Scope of the GSP PEIR?
UTIL-2: Implementing PMAs under the Turlock Subbasin GSP could result in a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs and fail to comply with federal, state, and local statutes and regulations related to solid waste.	No	The proposed project would not create solid waste that would need to be disposed of in a landfill. Therefore, the proposed project would not produce waste that would result in a landfill with insufficient permitted capacity to accommodate solid waste disposal needs. There would be no impact.	N/A	Yes
UTIL-3: Implementing PMAs under the Turlock Subbasin GSP could result in substantial adverse physical impacts associated with construction of new or modified fire protection, police protection, schools, and other public facilities.	No	The proposed project would not result in substantial adverse physical impacts associated with construction of new or modified fire protection, police protection, schools, and other public facilities. There would be no impact.	N/A	Yes
Wildfire				
WILD-1: Implementing PMAs under the Turlock Subbasin GSP could substantially impair an adopted emergency response plan or emergency evacuation plan.	Yes	The proposed project is located on private agricultural land. Construction and operation of the proposed project would not result in any road closures or increase traffic such that it would impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.	N/A	Yes
WILD-2: Implementing PMAs under the Turlock Subbasin GSP could, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	No	The proposed project is not located in an area of very high fire hazard severity (per CAL FIRE) and therefore these conditions are not an issue. There would be no impact.	N/A	Yes
WILD-3: Implementing PMAs under the Turlock Subbasin GSP could require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	No	The proposed project does not involve installation or maintenance of associated infrastructure (roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, there would be no impact.	N/A	Yes
WILD-4: Implementing PMAs under the Turlock Subbasin GSP could expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	Yes	The proposed project is located on previously cultivated agricultural land and has a very low landslide potential as there are no steep slopes or hillsides. The proposed project is also not located in an area of very high fire hazard severity (per CAL FIRE). While construction of the small water retention structures would change the drainage patterns of the site, these changes would collect water and promote percolation into the groundwater system. Therefore, the proposed project would not expose people or structures to significant risks and impacts would be less than significant.	N/A	Yes

Cumulative Impacts

As part of achieving groundwater sustainability in the Turlock Subbasin, the ETSGSA and WTSGSA are constructing or pursuing funding opportunities for various urban, municipal, and agricultural water supply projects described in the GSP PEIR. Additional projects in the Turlock Subbasin include but are not limited to agricultural land repurposing, habitat restoration, and floodplain restoration. Construction and operations associated with PMAs described in the GSP PEIR and the additional project types could require construction of new features, changes in groundwater use, and routine monitoring in the vicinity of the proposed project. For example, the Agricultural Recharge Project discussed in Table 2-2 of Chapter 2, *Description of the Types of Projects and Management Actions to be Implemented under the Turlock Subbasin Groundwater Sustainability Plan*, in the GSP PEIR would include similar construction, operation, and maintenance activities, such as earthwork, construction of water features, and monitoring. Like the proposed project, these projects would be required to adhere to applicable local, state and federal regulations, as well as implement applicable mitigation measures to avoid environmental impacts.

Chapter 4, *Cumulative Impacts*, of the GSP PEIR found that cumulative impacts related to aesthetics, energy, geology, soils, and paleontological resources, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, recreation, transportation, public services, and wildfire were all found to be less than significant, regardless of project location. Cumulative impacts related to agricultural resources, air quality, biological resources, cultural resources, greenhouse gas emissions, land use and planning, tribal cultural resources, and utilities to be significant and unavoidable due to the unknown extent and location of PMAs implemented under the Turlock Subbasin GSP.

As presented in Table 1, implementation of the proposed project would result in potential impacts to air quality, cultural resources, and hydrology and water quality. Therefore, the proposed project could make a considerable contribution to significant cumulative effects of the related projects. Potential impacts of the proposed project would be reduced with implementation of mitigation measures AIR-2, CUL-3, CUL-4, and HYD-1. These mitigation measures would therefore reduce the contribution of the proposed project to significant cumulative impacts to be less than cumulatively considerable. Cumulative impacts would therefore be less than significant with mitigation.

Groundwater Sustainability Benefits of the Proposed Project

The proposed project would benefit groundwater sustainability in the Turlock Subbasin through removal of orchards previously irrigated with groundwater to reduce groundwater demand. Construction of additional features to convey water to the proposed retention/recharge basin would facilitate groundwater recharge. In accordance with the ETSGSA's Rules and Regulations, the reduced groundwater demand achieved through this MLRP project would not be available for other uses and users within the Turlock Subbasin but rather would comprise a net reduction in demand.

Environmental Determination

The ETSGSA finds that all of the effects of the proposed project have been covered in the GSP PEIR. In addition, the proposed project meets the definition of a PMA as defined in the GSP PEIR. The applicable

mitigation measures from the GSP PEIR are presented in **Appendix C, *Mitigation Monitoring and Reporting Program***.

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Appendix A

Cultural Resources Assessment (Confidential)

Appendix B

Biological Resources Reconnaissance Survey Report



2600 Capitol Avenue
Suite 200
Sacramento, CA 95816
916.564.4500 **phone**
916.564.4501 **fax**

esassoc.com

memorandum

date September 9, 2025

to Mike Tietze, General Manager, East Turlock Subbasin Groundwater Sustainability Agency

from Angelica Oregel, Project Biologist, ESA

subject Biological Resources Reconnaissance Survey Report for Multibenefit Agricultural Land Repurposing Plan Pilot Projects in the Turlock Subbasin, Merced and Stanislaus Counties, California

Introduction

Environmental Science Associates (ESA) prepared this report for the East Turlock Subbasin Groundwater Sustainability Agency (ETSGSA) to document the methods and results of a biological resources reconnaissance survey completed for the Multibenefit Agricultural Land Repurposing Plan Pilot Projects (Pilot Projects) in Merced and Stanislaus Counties, California. Broadly, repurposing projects can involve fallowing and removing orchard trees, constructing retention basins and ponds, and rewilding areas with native vegetation. The purpose of this report is to document information on current site conditions and identify biological resources with potential to occur within the proposed project area, which includes the footprint for each of the four pilot project areas with a 250-foot buffer. Additionally, this report provides information on potential biological constraints associated with land repurposing.

Proposed Project Area

The proposed project area is defined as the proposed project area and vicinity associated with each of the four Pilot Projects, also referred to as direct recharge project concepts (DRPC).

- **Pilot Project 1 - Braden Farms Orchard Swale Rewilding and Stormwater Retention Project (DRPC-1)** - This proposed project area includes three proposed repurposing areas that are within an existing orchard. The proposed project area consists of orchards. The general land use surrounding proposed project area consist of orchards and a lake.
- **Pilot Project 2 - Sperry Farms Vegetated Land Cover Project (DRPC-2)** - This proposed project area includes three proposed repurposing areas that are within an existing orchard. The proposed project area consists of orchards and a fallow field consisting of annual grassland. The general land use surrounding the proposed project area consists of orchards and a private events venue to the southeast.
- **Pilot Project 3 - Rainbow Farms Land Repurposing Project (DRPC-11)** - This proposed project area includes three proposed repurposing areas that are within a farm consisting of orchards, hen houses, and other egg processing buildings. The proposed project area consists of orchard and barren land. The general land use surrounding the proposed project area consists of orchards.

- **Pilot Project 4 - Santa Fe Ranch Floodwater Capture and Recharge Basin Project (DRPC-31)** - This proposed project area includes six proposed repurposing areas that are within an existing orchard. The proposed project area consists of orchards and one freshwater pond. The general land use surrounding the proposed project area consists of orchards, human excavated freshwater ponds, freshwater forested/shrub wetlands, and a riverine feature.

Biological Resources Assessment

Methods

ESA Biologist Angelica Oregel surveyed for and evaluated biological resources within the proposed project area, focusing on identifying the presence or potential presence of sensitive biological resources regulated by federal or state resource agencies, and the presence of habitat for special-status species that should be considered during California Environmental Quality Act (CEQA) review. The information and analysis presented in this section focus on special-status species¹, wildlife habitat, vegetation communities, and potentially jurisdictional waters of the United States (U.S.) and/or of the state that occur or have the potential to occur within or in the vicinity of the four proposed project areas. The results of the assessment presented in this section are based on literature review and database queries as well as a reconnaissance-level field survey conducted within each proposed project area.

Data sources reviewed prior to performing the reconnaissance biological survey for this evaluation included the following:

- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) list (Project code: 2025-0046149) (USFWS, 2025) (see **Attachment A**);
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) (CDFW, 2025) (see **Attachment B**); and
- California Native Plant Society (CNPS) Inventory of Rare Plants and Endangered Plants known to occur within the Project area in USGS 7.5-minute topographic quadrangle codes Montpelier (3712056); Turlock Lake (3712055); Turlock (3712047); Cressey (3712046) (CNPS, 2025) (see **Attachment C**).

On Friday, April 4, 2025, a pedestrian biological resources reconnaissance survey was conducted at each proposed project area by ESA biologist Angelica Oregel. The weather conditions were sunny with a clear sky and consisted of a maximum temperature of 68°F, a minimum temperature of 50°F, and a maximum wind speed of 5 miles per hour. The reconnaissance survey consisted of traveling throughout the project areas, and along the proposed access roads. The survey also consisted of surveying areas within 250 feet of each project area with a 40x60 monocular scope and 10x42 binoculars. At the time of the reconnaissance survey, the proposed project areas were being used as an agricultural orchard and an egg farm. All surrounding areas were also agricultural properties with the exception of the private lake northeast of Braden Farms property.

¹Species that are protected pursuant to Federal or State endangered species laws or have been designated as Species of Special Concern by the CDFW, or species that are not included on any agency listing but meet the definition of rare, endangered, or threatened species of the CEQA Guidelines section 15380(b), are collectively referred to as “special-status species.”

Results

Several species known to occur in the vicinity of the Pilot Project areas are regulated pursuant to federal and/or state endangered species laws or have been designated as Species of Special Concern by CDFW. In addition, Section 15380(b) of the *CEQA Guidelines* provides a definition of rare, endangered, or threatened species. **Attachment D** contains a map of CNDDDB special-status species occurrences within 5 miles of each of the proposed project areas.

Special-status Plants

All Proposed Project Areas

Special-status plants known to occur in the vicinity of the proposed project areas based on the query of the CNPS inventory are listed in **Attachment C**. **No special-status plants were observed during the reconnaissance-level survey at any of the proposed project areas.** None of these species have the potential to occur in the Pilot Project areas due to regular weed management and orchard activities. Potential spreading of noxious weeds could occur during construction and thus mitigation measures to avoid the spread of noxious weeds are recommended.

Special-status Wildlife

All Proposed Project Areas

Based on desktop review, four special-status wildlife species were determined to have potential to occur within or adjacent to the proposed project areas. These species, and their corresponding listing, include:

- California tiger salamander (*Ambystoma californiense*) – federally and state listed
- Swainson's hawk (*Buteo swainsoni*) – state listed
- vernal pool fairy shrimp (*Branchinecta lynchi*) – federally listed
- vernal pool tadpole shrimp (*Lepidurus packardii*) – federally listed

There is no critical habitat for potential special-status species in any of the proposed project areas (see **Attachments A and B**) (USFW, 2025). The IPaC does list four critical habitats within the lake northeast of Braden Farms; however, the lake is not part of the proposed project area.

The most recent observation for special-status species within 5 miles of the proposed project areas included Swainson's hawk, which was recorded in 2007, an occurrence recorded in 1986 for vernal pool fairy shrimp, and an occurrence recorded in 1986 for vernal pool tadpole shrimp. A 1973 CNDDDB record for California tiger salamander near Sperry Farms is possibly extirpated due agricultural conversion that reduced upland habitat and pools. No suitable vernal pools for vernal pool fairy shrimp or vernal pool tadpole shrimp were observed at any of the proposed project areas; the 1986 CNDDDB records at Braden Farms are also possibly extirpated due to agricultural conversion that reduced vernal pool habitat since 1998. **No federal or state-listed wildlife species were observed during the reconnaissance survey at any of the proposed project areas.**

During the reconnaissance-level survey, marginally suitable habitat was observed for the following sensitive species: Swainson's hawk, vernal pool fairy shrimp, and vernal pool tadpole shrimp. No suitable habitat was observed for the California tiger salamander. Suitable nesting trees and utility towers are present at all four proposed project areas; however, no Swainson's hawks were observed at the time of the survey. One unknown raptor nest was observed during the survey at Sperry Farms at the location of the proposed retention basin along

Mustang Creek. The species could not be determined but one adult was observed in the nest throughout the survey (**Attachment E, Photo 5**). Red-tailed hawk (*Buteo jamaicensis*) adults were observed in the vicinity. Much of the proposed project areas consist of orchards, dirt roads, and processing buildings. The vegetation along the orchard alleys at each of the proposed project areas are managed and maintained regularly making it difficult for nests to be built successfully. A CNDDDB record from 2007, occurrence number 1108, describes two possible nest sites for Swainson's hawk in cottonwood trees. The habitat was described as a well-developed riparian corridor, in McConnel State Recreation Area, surrounded by agricultural fields. The nests were not confirmed. The location is that is 5.5 miles from Rainbow Farms, 4.5 miles from Santa Fe Ranch, 8 miles from Braden Farms, and 10 miles from Sperry Farms. No nesting activity at this location has been recorded for many years and the nest site is considered threatened by recreational use from humans according to the CNDDDB record. In summary, Swainson's hawk is not expected to occur within any of proposed project areas.

To avoid potential impacts to listed and special-status wildlife, measures are recommended for each of the pilot projects including a pre-construction raptor nesting surveys by a qualified biologist and a worker environmental awareness program.

Nesting Migratory Birds

The proposed project area and vicinity contain many trees, several of them large, as well as herbaceous vegetation and building structures. All of these areas are suitable for nesting migratory birds. During the reconnaissance-level survey, numerous MBTA species were observed at each proposed project area. Multiple active red-tailed hawk (*Buteo jamaicensis*) nests were also observed. At Santa Fe Ranch, two active red-tailed hawk nests were observed on a cottonwood tree (**Attachment E, Photo 6**) and the other on a eucalyptus tree. At Sperry Farms, one nest was observed on a steel lattice utility tower at the entrance. Numerous other nests were observed in the surrounding area.

Potential impacts on nesting birds listed under the Migratory Bird Treaty Act (MBTA) could occur depending on the timing of construction activities. For example, if activities are expected to occur during bird nesting season (approximately February 1 to September 1), there may be impacts to nesting birds. The nesting season may begin earlier or end later depending on species and weather conditions, and protection measures would need to be implemented to avoid potential impacts on active bird nests. These measures may include pre-construction surveys and avoidance of identified nesting sites with a suitable buffer until the young have fledged, and removing trees outside of nesting season.

Sensitive Natural Communities

A sensitive natural community is a biological community that is regionally rare, provides important habitat opportunities for wildlife, is structurally complex, or is in other ways of special concern to local, state, or federal agencies. Most sensitive natural communities are given special consideration because they perform important ecological functions, such as maintaining water quality and providing essential habitats for plants and wildlife. Some plant communities support a unique or diverse assemblage of plant species and therefore are considered sensitive from a botanical standpoint. The elimination of such communities would be considered a significant CEQA impact.

Braden Farms Orchard Swale Rewilding and Stormwater Retention Project

Although CNDDDB records indicate the northeast corner of Braden farms contains critical habitat for Colusa grass (*Neostapfia colusana*), hairy Orcutt grass (*Orcuttia pilosa*), and Hoover's spurge (*Chamaesyce hooveri*) this area does not overlap any of the proposed project area. The record indicates the critical habitat is a lake; however, the

northeast corner of the Braden farms project footprint does not overlap with the lake and is used as an access road. Therefore, no sensitive natural communities are present within the project footprint.

Sperry Farms Vegetated Land Cover Project

No sensitive natural communities are present the proposed project area.

Rainbow Farms Land Repurposing Project

No sensitive natural communities are present in the proposed project area.

Santa Fe Ranch Floodwater Capture and Recharge Basin Project

No sensitive natural communities are present in the proposed project area.

Aquatic Resources

Aquatic resources include features that may be subject to federal regulation under Section 404 of the Clean Water Act (CWA) as well as state of California regulation under the Porter-Cologne Water Quality Control Act, State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (State Wetlands Procedures), and California Fish and Game Code (FGC) Section 1600. A formal aquatic resources delineation was not conducted as part of the reconnaissance survey. However, based on review of the National Wetland Inventory (NWI) (USFWS 2023), field survey, and aerial photos, ephemeral features flow through three of the four proposed project areas, described in more detail below.

Braden Farms Orchard Swale Rewilding and Stormwater Retention Project

There are two riverine features running through two of the three swale areas at Braden Farms and one freshwater emergent wetland within one of the three swale areas at Braden Farms (**Attachment F**). One of the three swale areas is in the middle east portion of the project footprint where one riverine feature intersects the western portion of the proposed project area. One pond, approximately 6 feet by 3 feet, was observed on the northern side of a culvert that will dry up as temperatures rise (**Attachment E, Photo 1**). The second riverine feature also features the freshwater emergent wetland and intersects the second swale area in the northeast portion of the proposed project area. All features are fed by the eastern lake and do not drain into any other bodies of water.

During the reconnaissance-level survey, no riparian vegetation nor major surface water was observed at any of the features. The NWI classification codes for all features describes them as only having water for part of the year and drying up by the end of the growing season. Since these features are not tributaries that drain into other bodies of water and are temporarily flowing throughout the year, they are not to be considered a water of the U.S. However, all features are shown in the NWI and therefore are potentially waters of the state.

Sperry Farms Vegetated Land Cover Project

Within the proposed project area, two of the three swale areas on the west side of the property intersect aquatic resources at Sperry Farms. The area south of the entrance to the property on E Keyes Road intersects a freshwater emergent wetland, freshwater pond, and riverine feature as classified by NWI. The feature running to the east of this area is classified as riverine. A third feature crosses the northeastern area of the proposed project and is classified as freshwater emergent on the NWI map (**Attachment F; Attachment E, photo 2 and 3**). In all the aerial imagery dating back from 1998 to 2023, the depression has never had surface water flowing past the surrounding orchards into another body of water and the area was converted to orchard by 1998. The visible surface feature becomes subsurface before Bledsoe Road west of the project.

During the reconnaissance-level survey, no riparian vegetation nor major surface water was observed at any of the three features. The NWI classification code for these features describes them as only flowing and being saturated for part of the year during the growing season with the water table being well below the ground surface. Since these features are not tributaries that drain into other bodies of water and are temporarily flowing throughout the year, they are not to be considered a water of the U.S. However, all features are shown in the NWI and therefore are potentially waters of the state.

Rainbow Farms Land Repurposing Project

All ponds within the proposed project area are manmade, lined, and do not connect to other bodies of water. No potentially jurisdictional aquatic resources are present within the proposed project area.

Santa Fe Ranch Floodwater Capture and Recharge Basin Project

Mustang Creek, located approximately 0.24 miles south of the Turlock Irrigation District's (TID's) Highline Canal and south of Cross Ditch 1, lies within the proposed project area. It does not connect to any named river. According to the NWI (**Attachment F**), the feature is classified as riverine, freshwater forested/shrub wetland, freshwater emergent wetland, and freshwater pond. Predominant soils of Mustang Creek at Santa Fe Ranch are Hanford sandy loam, 0 to 1 percent slopes, and San Joaquin sandy loam, 0 to 3 percent slopes neither of which are hydric soils (NRCS, 2025).

During the reconnaissance-level survey, there was no visible surface water present (**Attachment E, Photo 4**). Since these features are not tributaries that drain into other bodies of water and are temporarily flowing throughout the year, they are not to be considered a water of the U.S. However, all features are shown in the NWI and therefore are potentially waters of the state.

Wildlife Movement Corridors

Each of the proposed project areas lie within orchards and are bordered by agricultural orchards with significant human activity, making it unlikely for species to reside there, including special-status species. While several special-status species have known ranges within the Central Valley that may overlap with the proposed project area, the areas do not provide suitable habitat or forage for these species, as previously noted. Therefore, wildlife in the area is more likely to be passing through rather than residing within the proposed project areas.

Potential Resource Agency Approvals

The Pilot Projects may require approval from the resource agencies for impacts on biological resources. Below is a discussion on what permit(s), if any, may be required for implementation of the Pilot Projects.

Aquatic Resource Permits

The NWI features, including Mustang Creek, identified across select proposed project areas will need further analysis during CEQA review to determine if it is assumed to be jurisdictional under the Clean Water Act and State of California regulations. Thus, the proposed project may require a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers, a Clean Water Act Section 401 Water Quality Certification from the Central Valley Regional Water Quality Control Board, or a California Fish and Game Code Section 1602 Streambed Alteration Agreement from CDFW.

Storm Water Permit. Construction of the proposed project would require compliance with the California Construction General Permit regarding stormwater discharges, and would require the preparation of a Storm Water Pollution Prevention Plan. The proposed project can obtain coverage under the Construction General Permit by filing a Notice of Intent and other documents with the State Water Resources Control Board.

Special-Status Species

Permits are required for impacts to listed wildlife species under Sections 7 or 10 of the Federal Endangered Species Act, Section 2081 of the California Endangered Species Act, and the California Fish and Game Code.

Federal Permits. The Project provides no suitable habitat for any state endangered or threatened species. Presence of species listed under the Federal Endangered Species Act would require coordination with the USFWS, however no presence was observed or determined by desktop analysis. Under Federal Endangered Species Act Section 7, consultation with USFWS and potential issuance of biological opinion will not be required; Section 7 consultation would be required should there be another federal permit (such as a Clean Water Act Section 404 permit), or funding required for the proposed project. If no other federal permit is required, take of a listed species could still occur using a Federal Endangered Species Act Section 10 incidental take permit; however, a Section 10 permit also would require submittal of a Habitat Conservation Plan and a finding from the USFWS that the permittee has “to the maximum extent practicable, minimized and mitigated the impacts of the taking” amongst other findings. (16 U.S.C. § 1539(a)(2)(B).) The Section 10 process is more complicated and time-consuming than the Section 7 process; thus, having a federal nexus for Section 7 consultation would be preferable. The nexus for Section 7 consultation is normally triggered by the Section 404 permit (which is assumed to be needed for the proposed project) but could also be triggered by federal funding for the proposed project.

The likelihood of either of the three federally listed species occurring at the proposed project areas is low because there is only marginally suitable habitat at the proposed project areas. The Project and its surrounding area are managed and maintained to allow for agricultural and poultry egg production; thus, only a handful of small mammal burrows were observed, and no vernal pools were observed. The lack of breeding ponds and the minimal number of burrows in the area also precludes potential for California tiger salamanders, vernal pool fairy shrimp, and vernal pool tadpole shrimp to be present. Thus, Section 7 consultation is unlikely to be necessary. However, contacting the agency will confirm this statement.

California Department of Fish and Wildlife. The Project provides marginally suitable habitat for two state-listed threatened species, California tiger salamander, and Swainson’s hawk. For any incidental take of species listed under the California Endangered Species Act, a Section 2081 permit would be required from CDFW. The focus of CDFW’s permit would be “full mitigation” of the impacts, ensuring that mitigation is “roughly proportional” to impacts, and ensuring funding for mitigation is adequate (Cal. Fish & Game Code §§ 2081(b), (c)).

As described above, there is low likelihood of California tiger salamander being present. Potential for Swainson’s hawk to occur in the proposed project areas are low. Proposed construction activities would not result in take of either species. Implementation of mitigation measures listed below would further reduce potential impacts. As a result a 2081 incidental take permit is unlikely to be necessary.

Summary

In summary, the proposed project areas for all pilot projects have low biological sensitivity for both federal and state-listed species. No incidental take permits are deemed necessary for implementation of the projects. Implementation of Mitigation Measures BIO-1 and BIO-3 as presented in the Turlock Subbasin Groundwater Sustainability Plan (GSP) Program Environmental Impact Report (PEIR) would require measures to reduce potential impacts on biological resources by conducting activities such as preconstruction raptor, nesting, and special-status species survey and biological construction monitoring for initial activities. The following provides a project-specific summary of the findings presented in this report.

Braden Farms Orchard Swale Rewilding and Stormwater Retention Project

No special-status plants, special-status wildlife, sensitive natural communities, or wildlife corridors were observed during the reconnaissance-level survey of the proposed project area. See **Attachment G** for the list of common flora and fauna that were observed. Three features that may be considered waters of the state were observed. MBTA species were observed throughout the proposed project area.

Sperry Farms Vegetated Land Cover Project

No sensitive natural communities, special-status plants, special-status wildlife, or wildlife corridors were observed during the reconnaissance survey for the proposed project areas. See **Attachment G** for the list of common flora and fauna that were observed. Two features that may be considered waters of the state were observed. MBTA species were observed throughout the proposed project area.

Rainbow Farms Land Repurposing Project

No special-status plants, special-status wildlife, sensitive natural communities, aquatic resources, or wildlife corridors were observed during the reconnaissance-level survey of the proposed project area. See **Attachment G** for the list of common flora and fauna that were observed. MBTA species were observed throughout the proposed project area.

Santa Fe Ranch Floodwater Capture and Recharge Basin Project

No special-status plants, special-status wildlife, or sensitive natural communities were observed during the reconnaissance-level survey of the proposed project area. See **Attachment G** for the list of common flora and fauna that were observed. One feature (Mustang Creek) that may be considered a water of the state was observed. MBTA species were observed throughout the proposed project area.

References

- California Department of Fish and Wildlife (CDFW). 2025. California Natural Diversity Data Base (CNDDDB). BIOS viewer 5.108.119 database for 7.5-minute U.S. Geological Survey (USGS) quadrangles code 3712056; 3712055: 3712047: 3712046, Tuolumne County, CA. Available: <https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick>. Accessed April 2025.
- California Native Plant Society (CNPS). 2025. California Rare Plant Ranking Inventory of Rare and Endangered Plants for USGS 7.5-minute quadrangle code 3712056; 3712055: 3712047: 3712046, Tuolumne County, CA. Available: <http://www.rareplants.cnps.org/>. Accessed April 2025.
- U.S. Fish and Wildlife Service (USFWS). 2023. National Wetland Inventory. Available: <https://www.fws.gov/wetlands/data/Mapper.html>. Accessed April 2025.
- U.S. Fish and Wildlife Service (USFWS). 2025. IPaC, USFWS Information for Planning and Consultation online system. Official Species List. Tuolumne County, California. May. Available: <https://ecos.fws.gov/ipac/>. Accessed April 2025.
- Natural Resources Conservation Service. 2025. Web Soil Survey. Available: <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed May 2025.

Attachment A



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

Phone: (916) 414-6600 Fax: (916) 414-6713



In Reply Refer To:

01/23/2025 15:54:52 UTC

Project Code: 2025-0046149

Project Name: East Turlock Subbasin - Land Repurposing Projects

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)).

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

(916) 414-6600

PROJECT SUMMARY

Project Code: 2025-0046149

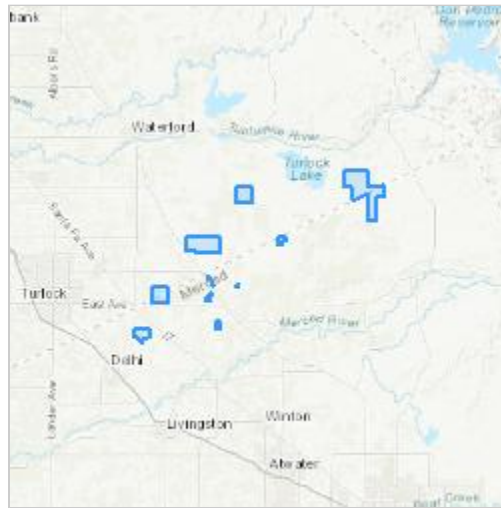
Project Name: East Turlock Subbasin - Land Repurposing Projects

Project Type: Drainage Project

Project Description: TBD

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@37.5438561,-120.6821616894955,14z>



Counties: Merced and Stanislaus counties, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 17 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Fresno Kangaroo Rat <i>Dipodomys nitratoide exilis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5150	Endangered
San Joaquin Kit Fox <i>Vulpes macrotis mutica</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2873	Endangered

REPTILES

NAME	STATUS
Northwestern Pond Turtle <i>Actinemys marmorata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

AMPHIBIANS

NAME	STATUS
California Tiger Salamander <i>Ambystoma californiense</i> Population: U.S.A. (Central CA DPS) There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2076	Threatened
Western Spadefoot <i>Spea hammondi</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Valley Elderberry Longhorn Beetle <i>Desmocerus californicus dimorphus</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7850	Threatened

CRUSTACEANS

NAME	STATUS
Conservancy Fairy Shrimp <i>Branchinecta conservatio</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8246	Endangered

NAME	STATUS
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/498	Threatened
Vernal Pool Tadpole Shrimp <i>Lepidurus packardii</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2246	Endangered

FLOWERING PLANTS

NAME	STATUS
Colusa Grass <i>Neostapfia colusana</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5690	Threatened
Fleshy Owl's-clover <i>Castilleja campestris ssp. succulenta</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8095	Threatened
Greene's Tuctoria <i>Tuctoria greenei</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1573	Endangered
Hairy Orcutt Grass <i>Orcuttia pilosa</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/2262	Endangered
Hartweg's Golden Sunburst <i>Pseudobahia bahiifolia</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1704	Endangered
Hoover's Spurge <i>Chamaesyce hooveri</i> There is final critical habitat for this species. Your location overlaps the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3019	Threatened
San Joaquin Valley Orcutt Grass <i>Orcuttia inaequalis</i> There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5506	Threatened

CRITICAL HABITATS

There are 4 critical habitats wholly or partially within your project area under this office's jurisdiction.

NAME	STATUS
Colusa Grass <i>Neostapfia colusana</i> https://ecos.fws.gov/ecp/species/5690#crithab	Final
Hairy Orcutt Grass <i>Orcuttia pilosa</i> https://ecos.fws.gov/ecp/species/2262#crithab	Final

NAME	STATUS
Hoover's Spurge <i>Chamaesyce hooveri</i> https://ecos.fws.gov/ecp/species/3019#crithab	Final
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> https://ecos.fws.gov/ecp/species/498#crithab	Final

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Daniel Huang
Address: 2600 Capitol Avenue Suite 200
City: Sacramento
State: CA
Zip: 95816
Email: dhuang@esassoc.com
Phone: 9165644500

Attachment B



Selected Elements by Common Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad> IS >(Montpelier (3712056)> OR >Turlock Lake (3712055)> OR >Turlock (3712047)> OR >Cressey (3712046))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
American bumble bee <i>Bombus pensylvanicus</i>	IIHYM24260	None	None	G3G4	S2	
Antioch multilid wasp <i>Myrmosula pacifica</i>	IIHYM15010	None	None	GH	SH	
bald eagle <i>Haliaeetus leucocephalus</i>	ABNKC10010	Delisted	Endangered	G5	S3	FP
California linderiella <i>Linderiella occidentalis</i>	ICBRA06010	None	None	G2G3	S2S3	
California tiger salamander - central California DPS <i>Ambystoma californiense</i> pop. 1	AAAAA01181	Threatened	Threatened	G2G3T3	S3	WL
Colusa grass <i>Neostapfia colusana</i>	PMPOA4C010	Threatened	Endangered	G1	S1	1B.1
Crotch's bumble bee <i>Bombus crotchii</i>	IIHYM24480	None	Candidate Endangered	G2	S2	
Delta button-celery <i>Eryngium racemosum</i>	PDAP10Z0S0	None	Endangered	G1	S1	1B.1
Greene's tuctoria <i>Tuctoria greenei</i>	PMPOA6N010	Endangered	Rare	G1	S1	1B.1
hairy Orcutt grass <i>Orcuttia pilosa</i>	PMPOA4G040	Endangered	Endangered	G1	S1	1B.1
hoary bat <i>Lasiurus cinereus</i>	AMACC05032	None	None	G3G4	S4	
Hoover's calycadenia <i>Calycadenia hooveri</i>	PDAST1P040	None	None	G2	S2	1B.3
Hoover's spurge <i>Euphorbia hooveri</i>	PDEUP0D150	Threatened	None	G1	S1	1B.2
least Bell's vireo <i>Vireo bellii pusillus</i>	ABPBW01114	Endangered	Endangered	G5T2	S3	
Merced kangaroo rat <i>Dipodomys heermanni dixonii</i>	AMAFD03062	None	None	G4T2	S2	
Merced monardella <i>Monardella leucocephala</i>	PDLAM180C0	None	None	GX	SX	1A
mountain plover <i>Charadrius montanus</i>	ABNNB03100	None	None	G3	S2	SSC
Northern California legless lizard <i>Anniella pulchra</i>	ARACC01020	None	None	G3	S2S3	SSC
Northern Hardpan Vernal Pool <i>Northern Hardpan Vernal Pool</i>	CTT44110CA	None	None	G3	S3.1	



Selected Elements by Common Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
northwestern pond turtle <i>Actinemys marmorata</i>	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
San Joaquin Valley Orcutt grass <i>Orcuttia inaequalis</i>	PMPOA4G060	Threatened	Endangered	G1	S1	1B.1
steelhead - Central Valley DPS <i>Oncorhynchus mykiss irideus pop. 11</i>	AFCHA0209K	Threatened	None	G5T2Q	S2	SSC
succulent owl's-clover <i>Castilleja campestris var. succulenta</i>	PDSCR0D3Z1	Threatened	Endangered	G4?T2T3	S2S3	1B.2
Swainson's hawk <i>Buteo swainsoni</i>	ABNKC19070	None	Threatened	G5	S4	
tricolored blackbird <i>Agelaius tricolor</i>	ABPBXB0020	None	Threatened	G1G2	S2	SSC
valley elderberry longhorn beetle <i>Desmocerus californicus dimorphus</i>	IICOL48011	Threatened	None	G3T3	S3	
vernal pool fairy shrimp <i>Branchinecta lynchi</i>	ICBRA03030	Threatened	None	G3	S3	
vernal pool tadpole shrimp <i>Lepidurus packardii</i>	ICBRA10010	Endangered	None	G3	S3	
western spadefoot <i>Spea hammondi</i>	AAABF02020	Proposed Threatened	None	G2G3	S3S4	SSC

Record Count: 29

Attachment C



CALIFORNIA NATIVE PLANT SOCIETY

CNPS Rare Plant Inventory

Search Results

10 matches found. Click on scientific name for details

Search Criteria: , 9-Quad include [3712056:3712055:3712047:3712046]

▲ SCIENTIFIC NAME	COMMON NAME	FAMILY	LIFEFORM	BLOOMING PERIOD	FED LIST	STATE LIST	GLOBAL RANK	STATE RANK	CA RARE PLANT RANK	CA ENDEMIC	DATE ADDED	PHOTO
<i>Calycadenia hooveri</i>	Hoover's calycadenia	Asteraceae	annual herb	Jul-Sep	None	None	G2	S2	1B.3	Yes	1980-01-01	No Photo Available
<i>Castilleja campestris</i> var. <i>succulenta</i>	succulent owl's-clover	Orobanchaceae	annual herb (hemiparasitic)	(Mar)Apr-May	FT	CE	G4? T2T3	S2S3	1B.2	Yes	1984-01-01	No Photo Available
<i>Eryngium racemosum</i>	Delta button-celery	Apiaceae	annual/perennial herb	(May)Jun-Oct	None	CE	G1	S1	1B.1	Yes	1974-01-01	No Photo Available
<i>Euphorbia hooveri</i>	Hoover's spurge	Euphorbiaceae	annual herb	(May-Jun)Jul-Sep(Oct)	FT	None	G1	S1	1B.2	Yes	1974-01-01	 © 2020 Neal Kramer
<i>Fritillaria agrestis</i>	stinkbells	Liliaceae	perennial bulbiferous herb	Mar-Jun	None	None	G3	S3	4.2	Yes	1980-01-01	 © 2016 Aaron Schusteff
<i>Monardella leucocephala</i>	Merced monardella	Lamiaceae	annual herb	May-Aug	None	None	GX	SX	1A	Yes	1974-01-01	 © 2020 Hannah Kang

<i>Neostapfia colusana</i>	Colusa grass	Poaceae	annual herb	May-Aug	FT	CE	G1	S1	1B.1	Yes	1974-01-01	No Photo Available
<i>Orcuttia inaequalis</i>	San Joaquin Valley Orcutt grass	Poaceae	annual herb	Apr-Sep	FT	CE	G1	S1	1B.1	Yes	1974-01-01	No Photo Available
<i>Orcuttia pilosa</i>	hairy Orcutt grass	Poaceae	annual herb	May-Sep	FE	CE	G1	S1	1B.1	Yes	1980-01-01	 © 2003 George W. Hartwell
<i>Tuctoria greenei</i>	Greene's tuctoria	Poaceae	annual herb	May-Jul(Sep)	FE	CR	G1	S1	1B.1	Yes	1974-01-01	 ©2008 F. Gauna

Showing 1 to 10 of 10 entries

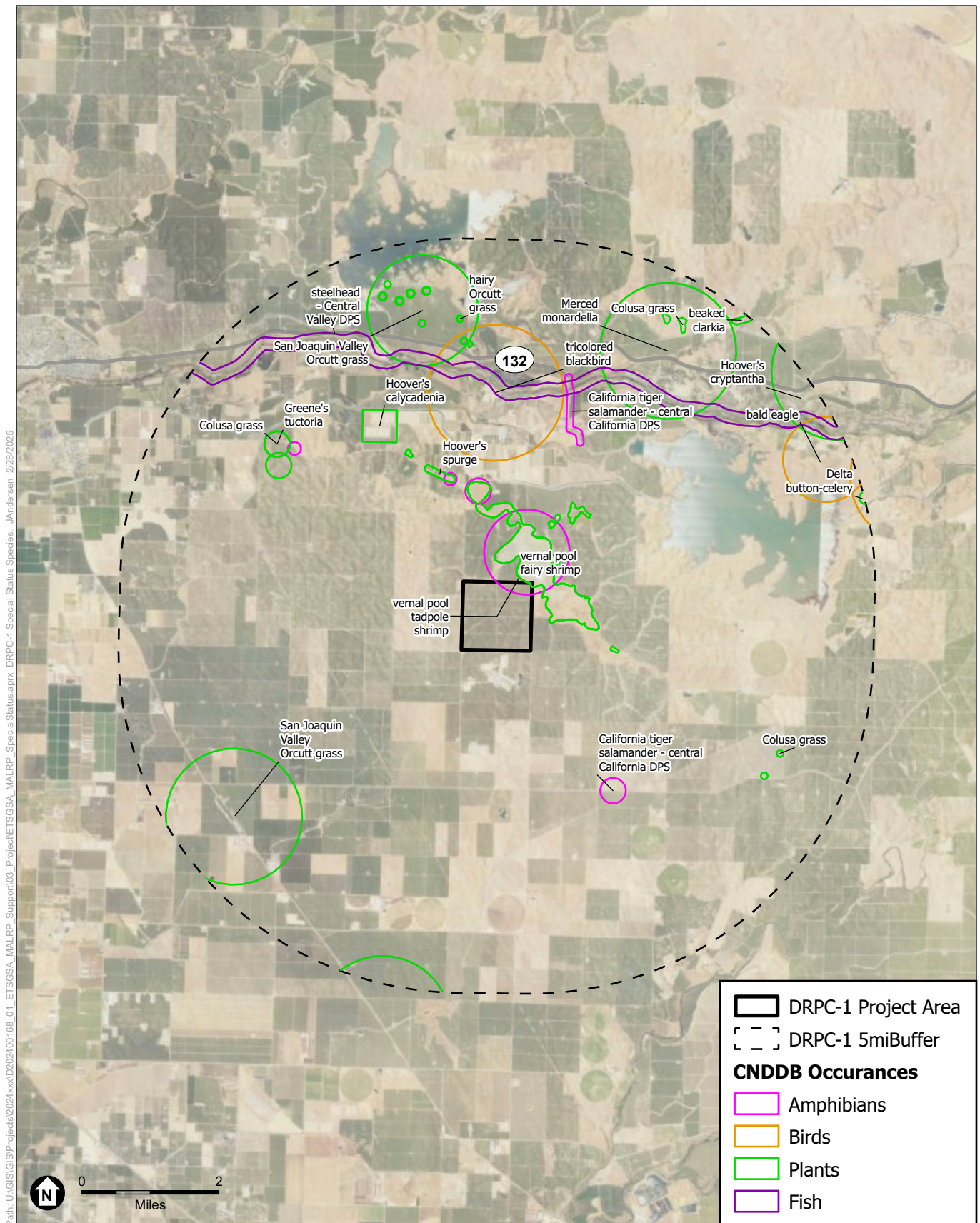
Go to top

Suggested Citation:

California Native Plant Society, Rare Plant Program. 2025. Rare Plant Inventory (online edition, v9.5.1). Website <https://www.rareplants.cnps.org> [accessed 4 April 2025].

}

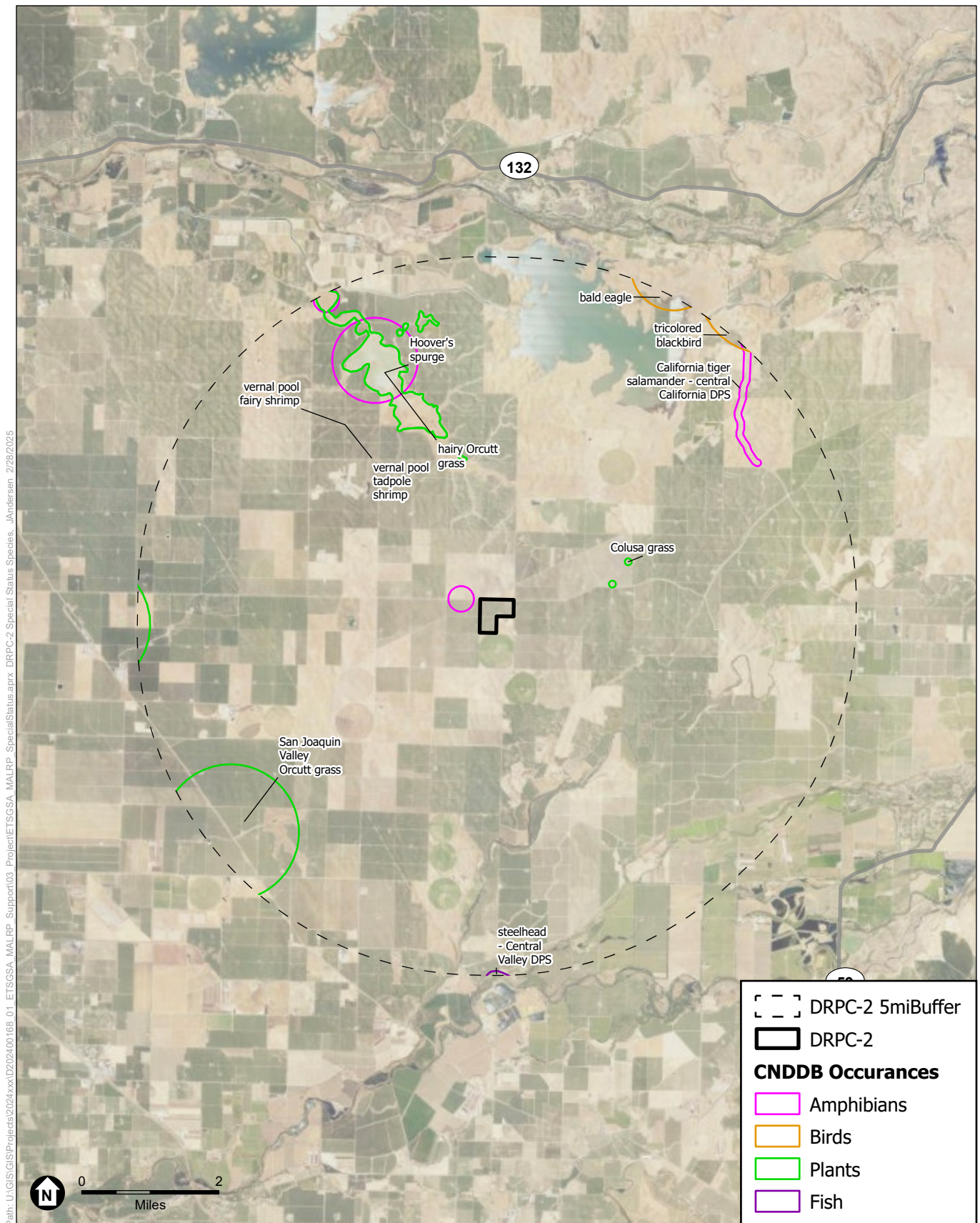
Attachment D



SOURCE: NAIP, 2025; CNDDDB, 2025; ESA, 2025

East Turlock Subbasin Land Repurposing Project

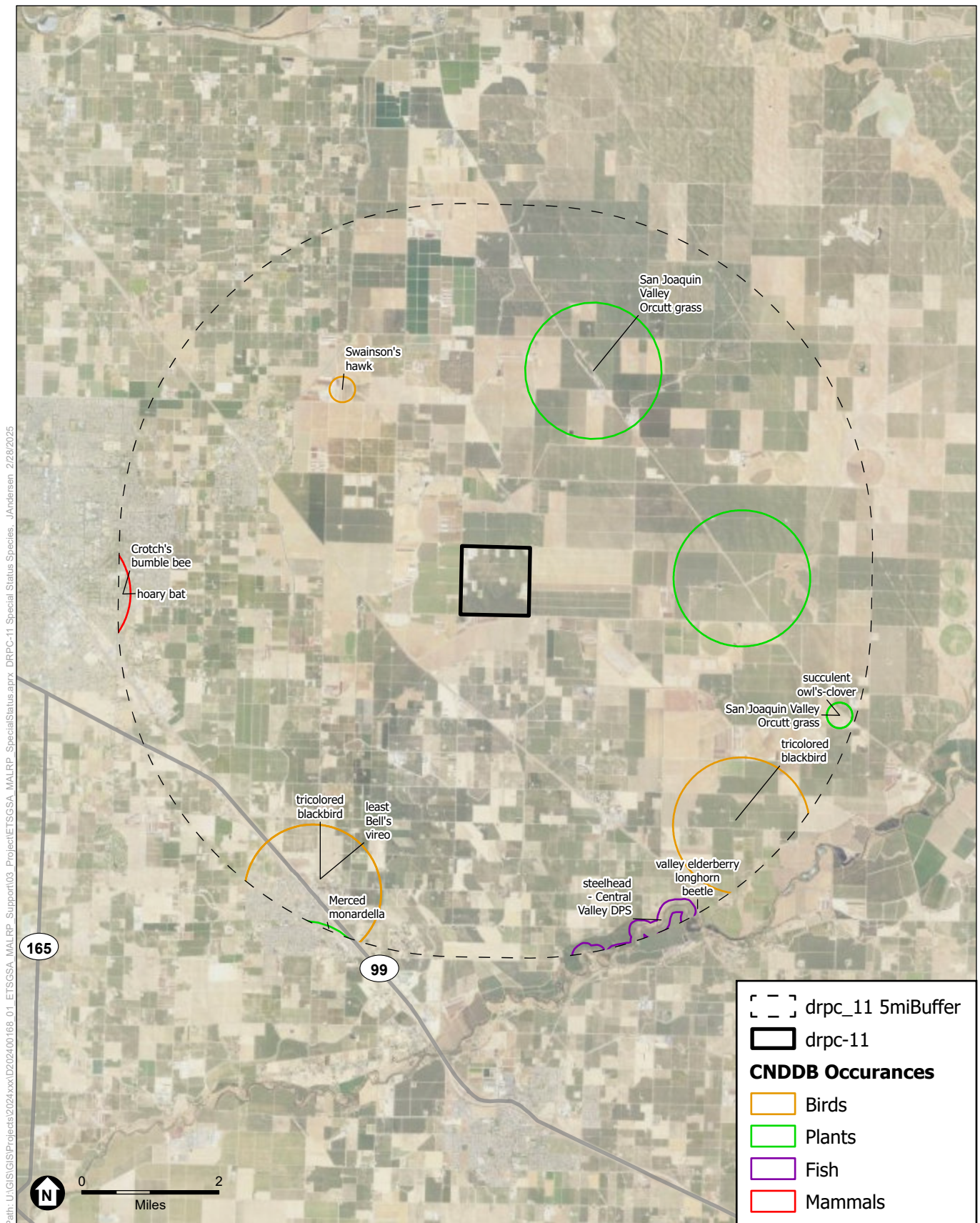
Figure 1
DRPC-1 Special Status Species



SOURCE: NAIP, 2025; CNDDDB, 2025; ESA, 2025

East Turlock Subbasin Land Repurposing Project

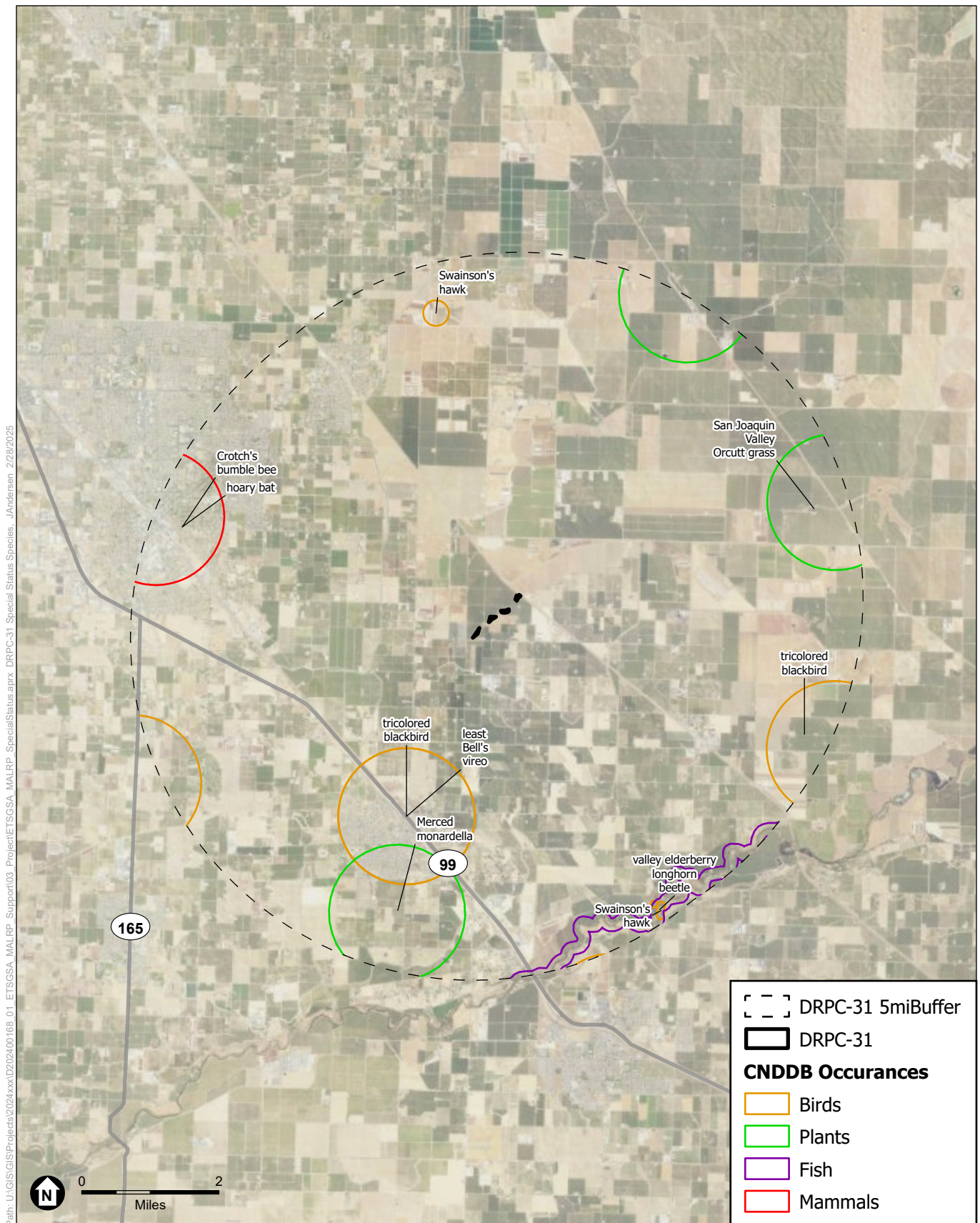
Figure 2
DRPC-2 Special Status Species



SOURCE: NAIP, 2025; CNDDDB, 2025; ESA, 2025

East Turlock Subbasin Land Repurposing Project

Figure 3
DRPC-11 Special Status Species



SOURCE: NAIP, 2025; CNDDDB, 2025; ESA, 2025

East Turlock Subbasin Land Repurposing Project

Figure 4
DRPC-31 Special Status Species

Attachment E

Representative Photographs

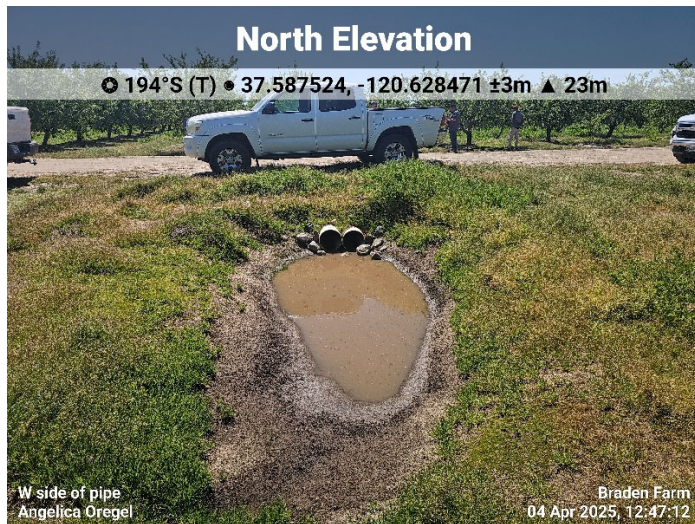


Photo 1: Ponded feature at Braden Farms, facing south.



Photo 2: Mustang Creek at Sperry farms at the riverine feature, photo facing northeast.

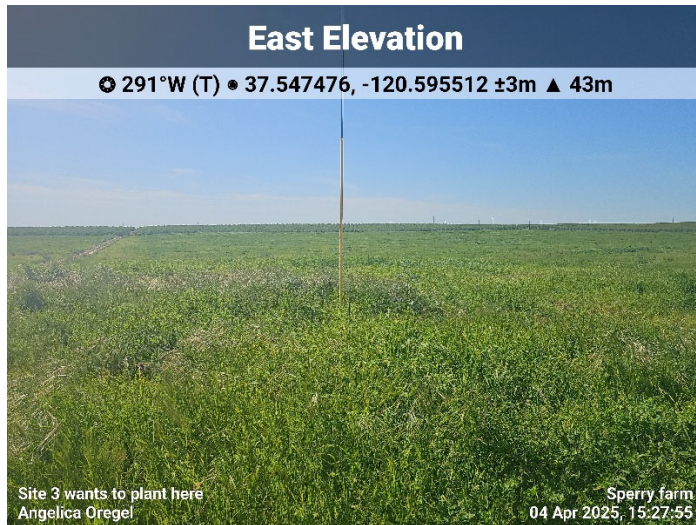


Photo 3: Freshwater emergent wetland at Sperry farms third study area, photo facing west.



Photo 4: Mustang Creek at Santa Fe Ranch, facing east.



Photo 5. An unknown raptor nest with adult present at Sperry Farms rewild study area, photo facing northwest.



Photo 6. Red-tailed hawk nest at Santa Fe Ranch, photo facing west.

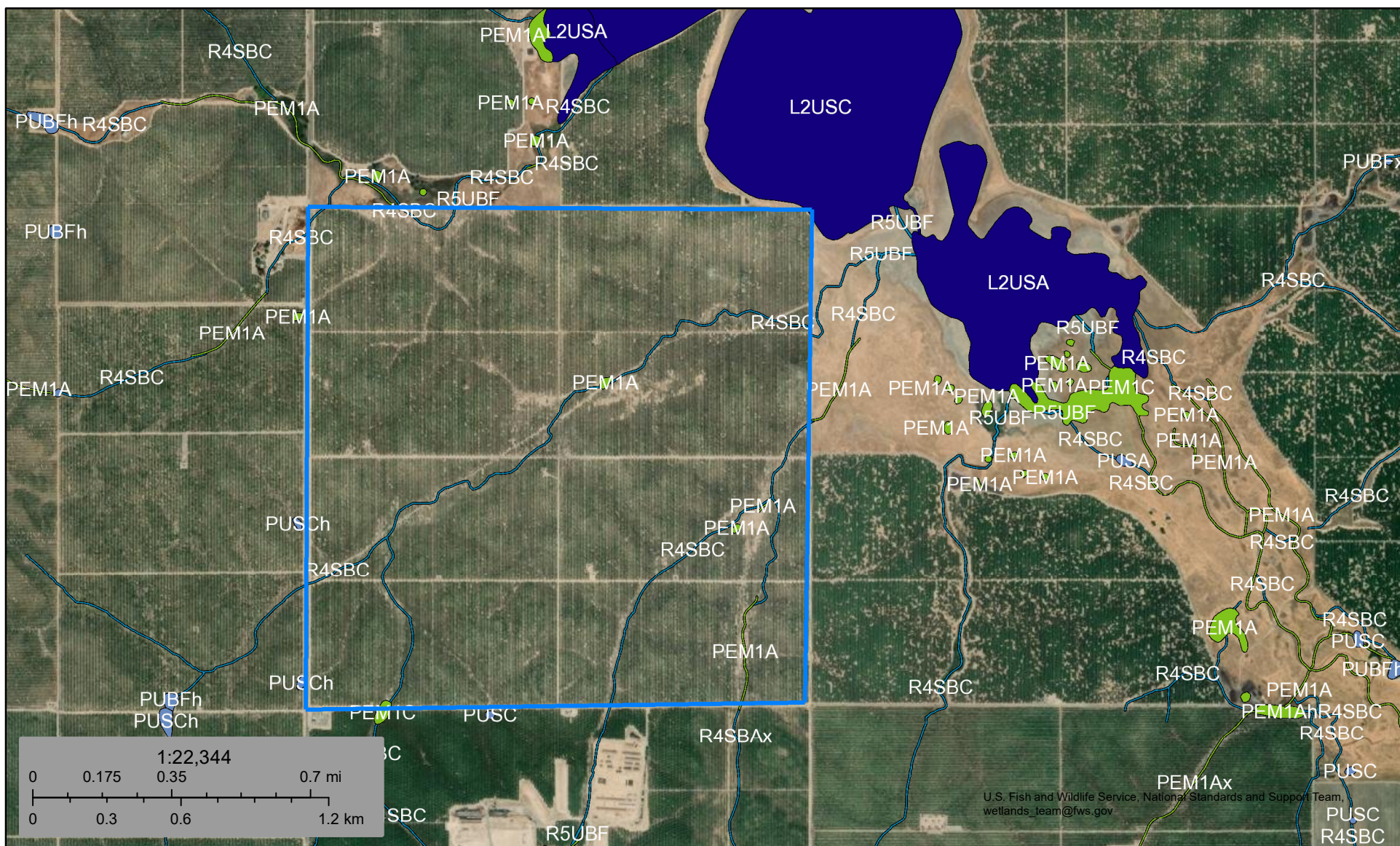
Attachment F



U.S. Fish and Wildlife Service

National Wetlands Inventory

DPRC 1-Braden



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

April 4, 2025

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

[illegible]

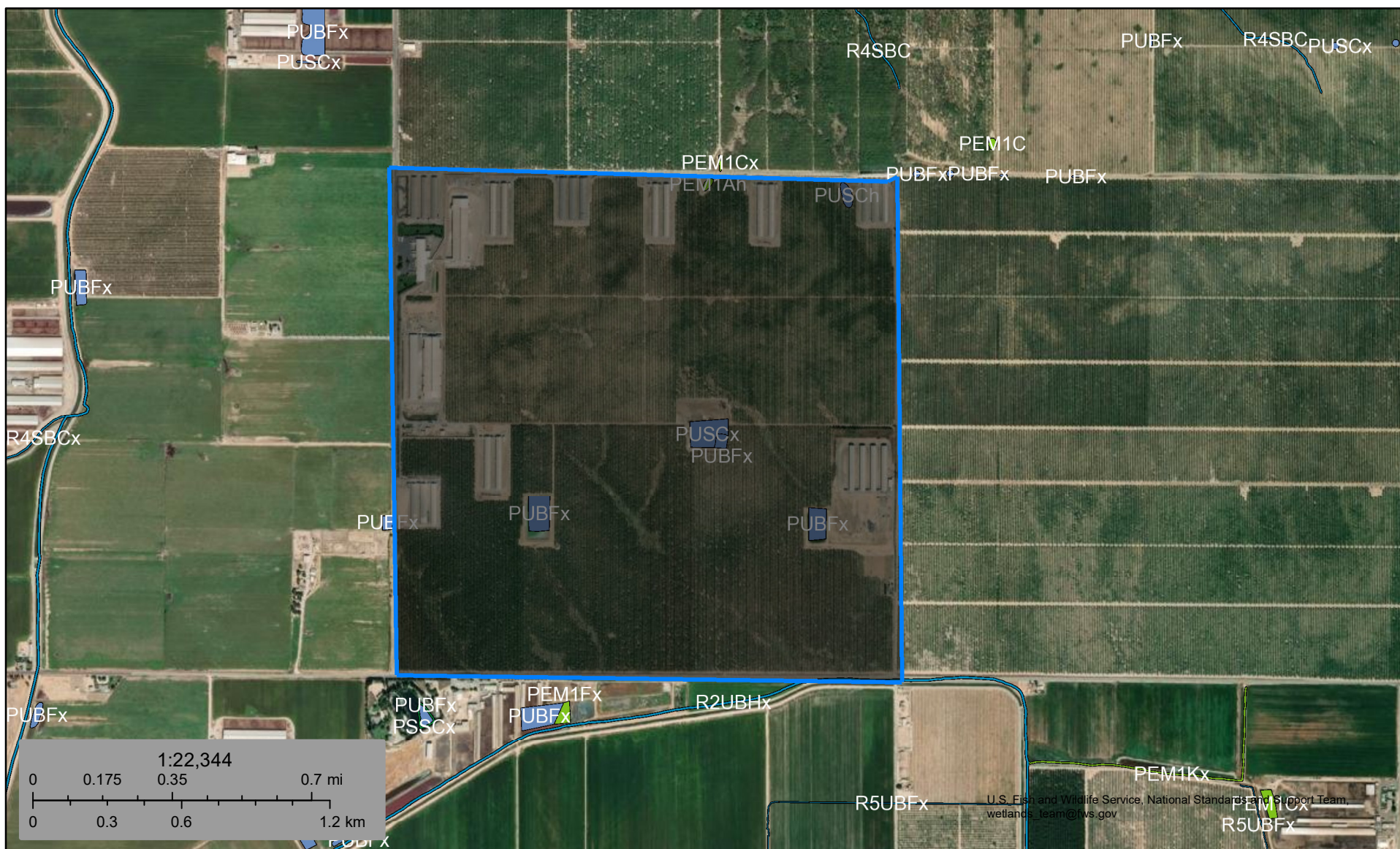
■ Estuarine and Marine Deepwater
■ Estuarine and Marine Wetland

 Freshwater Emergent Wetland
 Freshwater Forested/Shrub Wetland
 Freshwater Pond

 Lake
 Other
 Riverine

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

DRPC 11-Rainbow Farms_Gemperle



April 4, 2025

Wetlands

- Wetlands**
- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



U.S. Fish and Wildlife Service

National Wetlands Inventory

DRPC 31 - Firorini-Santa Fe Ranch



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

May 22, 2025

Wetlands

	Estuarine and Marine Deepwater		Freshwater Emergent Wetland		Lake
	Estuarine and Marine Wetland		Freshwater Forested/Shrub Wetland		Other
	Freshwater Pond		Riverine		

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Attachment G

Table 1-1
Common Species Observed in Proposed Project

Type	Common Name	Scientific Name	DRPC 1 - Braden Farms	DRPC 2 - Sperry Farms	DRPC 11 - Gemperle-Rainbow Farms	DRPC 31 - Firorini-Santa Fe Ranch
Flora	Almond	<i>Prunus dulcis</i>	x	x	x	x
Flora	American wild carrot	<i>Daucus pusillus</i>				x
Flora	Annual sowthistle	<i>Sonchus oleraceus</i>	x	x	x	x
Flora	Blue gum eucalyptus	<i>Eucalyptus globulus</i>				x
Flora	Bulrush	<i>Typha latifolia</i>				x
Flora	California Scrub-Jay	<i>Aphelocoma californica</i>		x		
Fauna	Cheeseweed	<i>Malva parviflora</i>	x	x	x	x
Fauna	Chickweed	<i>Stellaria media</i>		x		
Flora	Common dandelion	<i>Taraxacum officinale</i>	x	x	x	
Flora	Common fidleneck	<i>Amsinckia menziesii</i>	x	x	x	x
Flora	Common stork's bill	<i>Erodium cicutarium</i>	x	x	x	x
Flora	Curly dock	<i>Rumex crispus</i>		x		
Flora	Fremont cottonwood	<i>Populus fremontii</i>				x
Flora	Grass-poly	<i>Lythrum hyssopifolia</i>	x	x	x	x
Flora	Hairy fleabane	<i>Erigeron bonariensis</i>	x			
Flora	Hairy vetch	<i>Vicia villosa</i>		x		x
Flora	Himalayan blackberry	<i>Rubus armeniacus</i>				x
Flora	Poison Hemlock	<i>Conium maculatum</i>				x
Flora	Horseweed	<i>Erigeron canadensis</i>	x			
Flora	Italian ryegrass	<i>Lolium multiflorum</i>	x	x	x	x
Flora	Johnson grass	<i>Sorghum halepense</i>				x
Flora	Milk thistle	<i>Silybum marianum</i>		x		x
Flora	Panicled willowherb	<i>Epilobium brachycarpum</i>	x			x
Flora	Prickly lettuce	<i>Lactuca serriola</i>	x	x	x	x
Flora	Prostrate pigweed	<i>Amaranthus blitoides</i>	x	x	x	x
Flora	Puncture vine	<i>Tribulus terrestris</i>	x			x
Flora	Rattail fescue	<i>Vulpia myuros</i>	x	x	x	x
Flora	Red brome	<i>Bromus madritensis</i>	x	x	x	x
Flora	Ripgut brome	<i>Bromus diandrus</i>	x	x	x	x
Flora	Short pod mustard	<i>Hirschfeldia incana</i>	x	x	x	x
Flora	Slender oat	<i>Avena barbata</i>	x	x	x	x
Flora	Soft chess	<i>Bromus hordeaceus</i>	x	x		x
Flora	Turkey mullein	<i>Croton setiger</i>	x	x		x
Flora	Wall barley	<i>Hordeum murinum</i>			x	

Type	Common Name	Scientific Name	DRPC 1 - Braden Farms	DRPC 2 - Sperry Farms	DRPC 11 - Gemperle-Rainbow Farms	DRPC 31 - Firorini-Santa Fe Ranch
Flora	White clover	<i>Trifolium repens</i>	x	x	x	x
Flora	Willow	<i>Salix spp.</i>				x
Flora	Black phoebe	<i>Sayornis nigricans</i>	x		x	
Fauna	Cliff Swallow	<i>Petrochelidon pyrrhonota</i>			x	x
Fauna	Common raven	<i>Corvus corax</i>		x	x	x
Fauna	European starling	<i>Sturnus vulgaris</i>			x	
Fauna	House finch	<i>Haemorhous mexicanus</i>	x	x	x	x
Fauna	House sparrow	<i>Passer domesticus</i>	x	x	x	x
Fauna	Killdeer	<i>Charadrius vociferus</i>	x	x	x	x
Fauna	Mourning dove	<i>Zenaida macroura</i>	x	x	x	x
Fauna	Red-tailed hawk	<i>Buteo jamaicensis</i>	x	x	x	x
Fauna	Red-winged blackbird	<i>Agelaius phoeniceus</i>			x	
Fauna	Turkey vulture	<i>Cathartes aura</i>	x	x	x	x
Fauna	Western fence lizard	<i>Sceloporus occidentalis</i>		x		x
Fauna	Western kingbird	<i>Tyrannus verticalis</i>		x		
Fauna	Western toad	<i>Anaxyrus boreas</i>	x			
Fauna	White crowned sparrow	<i>Zonotrichia leucophrys</i>			x	

Appendix C

Mitigation Monitoring and Reporting Program

APPENDIX C

Mitigation Monitoring and Reporting Program

This Mitigation Monitoring and Reporting Program (MMRP) has been developed for the Rainbow Farms Land Repurposing Project (proposed project) to help ensure that the lead agency and/or project proponent carry out the adopted measures to mitigate and/or avoid significant environmental impacts. The proposed project is within the scope of the Consolidated Final Turlock Subbasin Groundwater Sustainability Plan Program Environmental Impact Report (GSP PEIR). This project-specific MMRP was developed based on Appendix E, MMRP of the GSP PEIR. Implementation of these mitigation measures would reduce impacts identified as potentially significant to the less-than-significant level.

Table C-1 identifies applicable mitigation measures, and is organized as follows:

- **Mitigation Measure:** Applicable mitigation measures that were identified in the GSP PEIR and modified as applicable to the proposed project. The numbering of the mitigation measure corresponds to the GSP PEIR.
- **Responsibility for Implementing:** This item identifies the entity that would undertake the required mitigation.
- **Responsibility for Monitoring:** This item identifies the entity that would undertake the required monitoring. The project proponent is primarily responsible for ensuring that the mitigation measures are implemented successfully. The project proponent may contract out for these services and/or make them part of any construction specifications, and other agencies may also be responsible for monitoring the implementation of mitigation measures. As a result, more than one monitoring party may be identified.
- **Timing:** Implementation of the action must occur before or during some part of project approval, project design, or construction, or on an ongoing basis. The timing of each measure is identified.

TABLE C-1 MITIGATION MONITORING AND REPORTING PROGRAM			
Mitigation Measure	Responsibility for Implementing	Responsibility for Monitoring	Timing
Mitigation Measure AIR-2: Minimize Dust from Fallowed Lands. Because the project involves land fallowing, land conversion, or other agricultural operations, the project proponent and/or construction contractor will implement applicable best management practices (BMPs) from agencies such as the U.S. Department of Agriculture Natural Resources Conservation Service and California Department of Food and Agriculture¹ to mitigate dust associated with fallowed lands. BMPs for fallowed lands could include, but are not limited to, the following: • Implement conservation cropping sequences and wind erosion protection measures, such as: – Plan ahead to start with plenty of vegetation residue and maintain as much residue on fallowed fields as possible. Residue is more effective for wind erosion protection if left standing. – If residues are not adequate, small grain can be seeded about the first of the year to take advantage of the winter rains and irrigated with a light irrigation if needed to get adequate growth. – Avoid any tillage if possible. – Avoid any traffic or tillage when fields are extremely dry to avoid pulverization.	Project proponent, construction contractor	Project proponent, construction contractor	During Project design and construction
Mitigation Measure CUL-3: Implement Measures to Protect Archaeological Resources during Project Construction or Operation. If cultural materials are encountered during construction or operation of the proposed project, all activity within 100 feet of the find shall cease and the find shall be flagged for avoidance. The lead agency and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the discovery and notify the lead agency of their initial assessment. If the qualified archaeologist determines that the resource is or is potentially Indigenous in origin, the lead agency shall consult with culturally affiliated California Native American Tribes to assess the find and determine whether it is potentially a tribal cultural resource. If the lead agency determines, based on recommendations from the qualified archaeologist and culturally affiliated California Native American Tribes, that the resource may qualify as a historical resource (per State CEQA Guidelines Section 15064.5), unique archaeological resource (per PRC Section 21083.2), or tribal cultural resource (per PRC Section 21074), then the resource shall be avoided if feasible. If avoidance is not feasible, the lead agency shall consult with a qualified archaeologist, culturally affiliated California Native American Tribes, and other appropriate interested parties to determine treatment measures to minimize or mitigate any potential impacts on the resource pursuant to PRC Section 21083.2 and State CEQA Guidelines Section 15126.4. Once treatment measures have been determined, the lead agency shall prepare and implement an archaeological (and/or tribal cultural) resources management plan that outlines the treatment measures for the resource. Treatment measures typically consist of the following steps: • Modify the project to avoid impacts on resources. • Plan parks, green space, or other open space to incorporate resources. • Recover the scientifically consequential information from the archaeological resource before any excavation at the resource’s location. This typically consists of (but is not necessarily limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the resource to be affected by the project. • Develop and implement interpretive programs or displays. If the resource qualifies as a tribal cultural resource (per PRC Section 21074), implement measures for avoiding or reducing impacts such as the following: • Avoid and preserve the resource in place through measures that include but are not limited to the following: – Plan and construct the project to avoid the resource and protect the cultural and natural context. • Plan greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria. Treat the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, through measures that include but are not limited to the following: – Protect the cultural character and integrity of the resource. – Protect the traditional use of the resource. – Protect the confidentiality of the resource. • Implement permanent conservation easements or other interests in real property, with cultural appropriate management criteria for the purposes of preserving or using the resource or place.	Project proponent	Project proponent, qualified archaeologist	During Project construction and operation
Mitigation Measure CUL-4: Implement Measures to Protect Human Remains during Project Construction or Operation. If human remains are encountered during construction or operation and maintenance of the proposed project, all work shall immediately halt within 100 feet of the find, and the lead agency shall contact the appropriate county coroner to evaluate the remains and follow the procedures and protocols set forth in State CEQA Guidelines Section 15064.5(e)(1). If human remains encountered are on or in the tide and submerged lands of California, the lead agency shall also contact the California State Lands Commission. If the coroner determines that the remains are Native American in origin, the appropriate county shall contact the California NAHC, in accordance with California Health and Safety Code Section 7050.5(c) and PRC Section 5097.98. Per PRC Section 5097.98, the project’s lead agency shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the lead agency has discussed and conferred, as prescribed PRC Section 5097.98, with the most likely descendants and the property owner regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	Project proponent, qualified archaeologist	Project proponent, qualified archaeologist	During Project construction and operation

TABLE C-1 MITIGATION MONITORING AND REPORTING PROGRAM			
Mitigation Measure	Responsibility for Implementing	Responsibility for Monitoring	Timing
Mitigation Measure HYD-1: Implement Water Quality Protection Measures during Project Construction During construction of the proposed project, construction-related BMPs shall be implemented as part of the project-specific Stormwater Pollution Prevention Plan (SWPPP) developed as part of the NPDES Construction General Permit: • Soil stabilization, sediment control, wind erosion control, tracking control, non-stormwater management, and waste management/materials pollution control shall be implemented. • Construction stockpiles shall be covered to prevent blowoff or runoff during weather events. • Severe-weather-event erosion control materials and devices shall be stored on-site for use as needed. • Regular and post-storm inspections to deploy and adapt BMPs to minimize stormwater pollutant discharges. • Other BMPs shall be applied as determined necessary as part of the SWPPP.	Project proponent and/or construction contractor	Project proponent and/or construction contractor	During Project construction
SOURCES: ¹ California Department of Food and Agriculture (CDFA). 2022. Drought Measures for Dust Mitigation and Air Quality in California. Available: https://www.cdfa.ca.gov/oefi/drought_and_dust.html . Accessed June 2022.			