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GAVIN NEWSOM, Governor
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December 23, 2025

Joel Andrews, City Planner
City of Patterson
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**Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)
City of Patterson 2023-2031 6th Cycle Housing Element (Plan)
SCH No. 2025111094**

Dear Joel Andrews:

The California Department of Fish and Wildlife (CDFW) received a NOP from the City of Patterson (City) for the Plan pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Plan that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Plan that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). Similarly, for

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 2

purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Plan.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PLAN DESCRIPTION SUMMARY

Proponent: City of Patterson

Objective: The Plan proposes to update the City of Patterson's 2015–2023 Housing Element (adopted February 2, 2016). The Plan identifies sufficient housing sites to meet and exceed the City's Regional Housing Needs Allocation (RHNA) and plans for the development of 4,919 housing units over the eight-year planning period.

Location: The Plan area is located in central California within the City of Patterson approximately 15 miles southwest of Modesto in Stanislaus County and encompasses an area of approximately 7.5 square miles. Interstate 5 is located west of the city limits, while State Route 33 runs northwest to southeast through the planning area. The specific sites (i.e., development areas) within the Plan area and related Assessor's Parcel Numbers (APNs) are listed in Attachment 1.

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 3

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to the City in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for the Plan.

The NOP states the Plan area's topography is generally flat, and the area proposed for development are characterized by agricultural uses. Two intermittent streams, Del Puerto Creek and Salado Creek, traverse the Plan area. Additionally, the Delta-Mendota Canal and the California Aqueduct border the Plan area to the east. Aerial Imagery shows the development areas within the Plan area are a mix of annual grasslands, fallowed agricultural lands, and anthropogenic areas surrounded by residential communities or commercial businesses.

Based on aerial imagery and species occurrence records from the California Natural Diversity Database (CNDDB) (CDFW 2025) as well as CDFW's familiarity with biological resources in the Plan area, the Plan area is known to and/or has the potential to support special-status species, and these resources need to be evaluated and addressed as part of the DEIR and prior to any approvals that would allow ground-disturbing activities. CDFW recommends that the species identified in Attachment 2 of this letter be considered as part of the DEIR that will be drafted for this Plan.

The NOP notes the biological resources evaluation for this Plan will use a programmatic approach and states that, "This evaluation is a high-level analysis for the proposed Housing Element update. Specific subsequent projects and their potential effects on biological resources are not fully known at this time. Accordingly, this analysis uses a programmatic approach to evaluating potential impacts to sensitive biological resources that may result from future housing development projects, corresponding with the conceptual level of project information available." Given that a housing element serves primarily as a planning tool and that future project-level CEQA documents and/or projects are expected to be tiered from it, CDFW recommends the following comments and measures be incorporated within the DEIR for this Plan and be applied for any future projects tiered from it.

San Joaquin Kit Fox

The NOP Initial Study (IS) includes Mitigation Measure (MM) BIO-4 to mitigate for potential impacts to San Joaquin Kit Fox (SJKF). MM BIO-4 requires a qualified biologist to conduct pre-construction surveys and implement a 200-foot no-disturbance buffer around SJKF natal/pupping dens and consult with CDFW and U.S. Fish and Wildlife. CDFW concurs with this measure and recommends adjusting the measure to include no-disturbance buffers for potential and known dens as well as outlined in U.S. Fish and Wildlife's (USFWS's) "Standardized Recommendations for Protection of the

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 4

San Joaquin Kit Fox Prior to or During Ground Disturbance” (2011) (USFWS Protocol). If the no-disturbance buffers outlined in the USFWS Protocol for SJKF are not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) would be necessary to comply with CESA.

Swainson’s Hawk

The NOP IS includes Mitigation Measure (MM) BIO-5 to mitigate for potential impacts to Swainson’s hawk (SWHA). MM BIO-5 requires a qualified biologist to conduct a pre-construction survey 30 days prior to the beginning of construction and implement a 0.25- or 0.5-mile no-disturbance buffer around active SWHA nests. CDFW concurs with these measures but recommends that pre-construction surveys follow the entire methodology outlined in the Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in the Central Valley guidance document (Swainson’s Hawk Technical Advisory Committee 2000). This survey protocol requires multiple surveys and includes early season surveys to assist the project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites prior to initiating ground-disturbing activities. CDFW also recommends that a minimum 0.5-mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. In the event an active SWHA nest is detected, and a 0.5-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Tricolored Blackbird

The Plan area is within the known geographic range of tricolored blackbird (TRBL) and historical occurrences have been documented within the Plan area (CDFW 2025). Based on aerial imagery, certain development areas could provide potential foraging and nesting habitat to TRBL. As such, CDFW recommends the following mitigation measures be included in the DEIR and implemented for future projects tiered from the Plan.

Recommended Mitigation Measure 1: TRBL Habitat Assessment

CDFW recommends that construction be timed to avoid the normal bird breeding season (February 1 through September 15). However, if construction must take place during that time, CDFW recommends that a qualified biologist conduct a habitat

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 5

assessment for TRBL prior to the initiation of project activities to determine whether suitable nesting habitat is present within the project site or project vicinity.

Recommended Mitigation Measure 2: TRBL Surveys

If suitable TRBL habitat is determined to be present, CDFW recommends that a qualified wildlife biologist conduct surveys for nesting TRBL no more than 10 days prior to the start of implementation to evaluate presence/absence of TRBL nesting colonies in proximity to project activities and to evaluate potential Project-related impacts.

Recommended Mitigation Measure 3: TRBL Avoidance Buffer

If an active TRBL nesting colony is found during the pre-construction surveys, CDFW recommends implementation of a minimum 300-foot no-disturbance buffer around the colony in accordance with CDFW's "Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015" (CDFW 2015). CDFW recommends that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon the colony or parental care for survival.

It is important to note that TRBL colonies can expand over time. For this reason, CDFW also recommends conducting pre-construction surveys of an identified nesting colony within 10 days prior to the start of ground or vegetation disturbing activities to reassess the colony's real extent.

Recommended Mitigation Measure 4: TRBL Take Authorization

If a TRBL nesting colony is detected during surveys, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Western Burrowing Owl

The California Fish and Game Commission (FGC) approved western burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

Joel Andrews, City Planner
 City of Patterson
 December 23, 2025
 Page 6

The NOP IS includes Mitigation Measure (MM) BIO-2 to mitigate for potential impacts to western burrowing owl (BUOW). MM BIO-2 requires a qualified biologist to conduct a pre-construction survey no more than 14 days prior to the beginning of construction and implement appropriate no-disturbance buffers as outlined in the Staff Report on Burrowing Owl Mitigation (CDFW 2012). MM BIO-2 also states that if a BUOW den is found, and avoidance is not possible, burrow exclusion may be conducted during the non-breeding season. CDFW does not concur that MM BIO-2 is sufficient to mitigate for impacts to BUOW and avoid unauthorized take of the species. In particular, the implementation of burrow exclusion (i.e., passive relocation) would have a strong likelihood to result in the unauthorized take of BUOW, absent an ITP. As such, CDFW recommends MM BIO-2 be modified to incorporate the following:

Recommended Mitigation Measure 5: BUOW Pre-construction Surveys

CDFW recommends that focused surveys, following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report) (CDFG 2012), be conducted the survey season immediately prior to project implementation. Please note that the 2012 Staff Report necessitates multiple surveys prior to the initiation of construction.

Recommended Mitigation Measure 6: BUOW Avoidance Buffer

Should a BUOW or known BUOW den (active or inactive) be detected, either during pre-construction surveys or construction activities, CDFW recommends that no-disturbance buffers, as outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012), be implemented prior to and during any ground-disturbing activities. CDFW also recommends that these buffers be implemented for both wintering and breeding BUOW.

Recommended Mitigation Measure 7: BUOW Take Authorization

If a BUOW or known BUOW den (active or inactive) is detected, and the no-disturbance buffers outlined in the 2012 Staff Report on Burrowing Mitigation are not feasible, consultation with CDFW is warranted to discuss how to implement the project and avoid take. If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) would be necessary to comply with CESA.

Crotch's Bumble Bee

The Plan area is within the known geographic range of Crotch's bumble bee (CBB) and historical occurrences have been documented within the Plan area (CDFW 2025). CBB are known to inhabit areas of grasslands and scrub that contain requisite habitat

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 7

elements for nesting, such as small mammal burrows and bunch/thatched grasses. Based on aerial imagery, these habitat elements may be present within several of the development areas within the Plan area. As such, CDFW recommends the following:

Recommended Mitigation Measure 8: CBB Habitat Assessment

CDFW recommends a qualified biologist conduct a habitat assessment to determine if the entire project site and the immediate surrounding vicinity contain habitat suitable to support CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment.

Recommended Mitigation Measure 9: CBB Surveys Prior to Construction

If potentially suitable habitat is identified, regardless of what time of year project activities will be conducted, CDFW recommends that a qualified biologist conduct focused surveys for CBB and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

Recommended Mitigation Measure 10: CBB Avoidance

If CBB is detected, CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement project activities and avoid take. Any detection of CBB prior to or during project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 11: CBB Take Authorization

If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Special-Status Bats

The NOP IS includes Mitigation Measure (MM) BIO-2 to mitigate for potential impacts to special-status bats. MM BIO-7 requires a qualified biologist to conduct pre-construction surveys within 14 days of tree removal or construction activities. MM BIO-7 also states the surveys shall include visual inspection of guano, construction access routes, cavities, crevices, exfoliating bark, bark fissures that could provide suitable potential

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 8

nest or roost habitat, and use of a bat echolocation detector such as an “Anabat” unit. CDFW concurs with these mitigation measures and recommends that any focused surveys be conducted within one 24-hour period and be conducted during dusk emergence and pre-dawn re-entry.

Species of Special Concern

The Plan area is within the known geographic range of American badger (AMBA), coast horned lizard (CHL), Northern California legless lizard (NCLL), San Joaquin coachwhip (SJC), and western spadefoot (WESP). Based on aerial imagery, suitable habitat may be present within several of the development areas within the Plan area. As such, CDFW recommends the following:

Recommended Mitigation Measure 12: Special-Status Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment to determine if the project site and the immediate surrounding vicinity contain habitat suitable to support AMBA, CHL, NCLL, SJC, and WESP.

Recommended Mitigation Measure 13: Pre-construction Survey for Special-Status Species

If suitable habitat is identified, prior to the start of work, CDFW recommends that a qualified biologist conduct focused surveys for AMBA, CHL, NCLL, SJC, and/or WESP and their requisite habitat features.

Recommended Mitigation Measure 14: Special-Status Species Avoidance

Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around these species and their associated burrows and habitat areas. CDFW also recommends that if these species are found, project activities in their immediate vicinity cease, allowing individuals to leave the project site on their own accord.

Editorial Comments and/or Suggestions

Nesting birds: For future project site(s) tiered from the Plan, CDFW encourages that all ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February 15 through September 15), developers are responsible for ensuring that implementation of their project does not result in a violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 9

CDFW recommends that a qualified biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the project site to identify nests and determine their status. A sufficient area means any area potentially affected by the project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Cumulative Impact Analysis: Given that a housing element serves primarily as a planning tool and that future project-level CEQA documents and/or projects are expected to be tiered from it, CDFW recommends that a cumulative impact analysis be conducted for all potential biological resources that will either be significantly or potentially significantly impacted by implementation of the Plan, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by any future project, even if those impacts are expected to be relatively small (i.e. less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Plan Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in

Joel Andrews, City Planner
 City of Patterson
 December 23, 2025
 Page 10

support of the Plan's DEIR be used to develop and modify the Plan's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, CDFW advises that remaining impacts to sensitive biological resources be mitigated to reduce impacts to a less than significant level, if feasible.

California Natural Diversity Database: Please note that the CNDDDB is populated by voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDDB does not mean that a species is not present. In order to adequately assess any potential project-related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present.

Lake and Streambed Alteration: Reasonably foreseeable future projects tiered from this Plan may be subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires project proponents to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial in nature. For additional information on notification requirements, please contact our staff in the Lake and Stream Alteration Program at (559) 243-4593, or R4LSA@wildlife.ca.gov. CDFW therefore recommends that the Plan DEIR include information related to these requirements of Fish and Game code and advises that projects tiered from this Plan retain a qualified biologist to determine if potential impacts to streams may require the need to notify pursuant to Fish and Game Code section 1602.

ENVIRONMENTAL DATA

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

Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 11

information reported to CNDDDB can be found at the following link:
<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

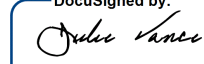
FILING FEES

The Plan, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Plan impacts on biological resources. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). Please see the enclosed, Attachment 3, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453 or john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT 1- Site Assessor's Parcel Number Table
ATTACHMENT 2- Special-Status Species Table
ATTACHMENT 3- MMRP

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Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 12

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Joel Andrews, City Planner
City of Patterson
December 23, 2025
Page 13

REFERENCES

- California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2015. Staff guidance regarding avoidance of impacts to tricolored blackbird breeding colonies on agricultural fields in 2015. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act (CESA) candidate bumble bee species. Sacramento, California, USA.
- California Department of Fish and Wildlife. 2025. Biogeographic information and observation system (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 10 December 2025.
- Swainson's Hawk Technical Advisory Committee. 2000. Recommended timing and methodology for Swainson's hawk nesting surveys in California's Central Valley. Swainson's Hawk Technical Advisory Committee.
- U. S. Fish and Wildlife Service. 2011. Standard recommendations for the protection of the San Joaquin kit fox prior to or during ground disturbance. Sacramento Fish and Wildlife Office, Sacramento, California.

Attachment 1

Attachment 1

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
ASSESSOR'S PARCEL NUMBER TABLE**

PROJECT: City of Patterson 2023-2031 6th Cycle Housing Element

SCH No.: 2025111094

Project Site Number	Assessor's Parcel Number
1A	021-023-027, 021-023-026
1B	021-023-023, 021-023-024, 021-023-025, 021-023-020, 021-023-021, 021-023-022, 021-023-017, 021-023-018, 021-023-019
2	021-091-007, 021-091-008
3	021-040-055
4	047-024-024
5	047-034-035
6	048-042-001
7	048-042-008
8	048-043-002
9	048-042-015
10	048-048-007
11	047-031-062
12	021-028-007
13	021-028-008
14	021-098-003

Attachment 2

Attachment 2

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
SPECIAL-STATUS SPECIES TABLE**

PROJECT: City of Patterson 2023-2031 6th Cycle Housing Element

SCH No.: 2025111094

Common Name	Scientific Name	Status	
		State	Federal
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	T	E
Swainson's hawk	<i>Buteo swainsoni</i>	T	-
Tricolored blackbird	<i>Agelaius tricolor</i>	T	-
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	C	-
Crotch's bumble bee	<i>Bombus crotchii</i>	C	-
American badger	<i>Taxidea taxus</i>	SSC	-
Pallid bat	<i>Antrozous pallidus</i>	SSC	-
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC	-
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC	-
Coast horned lizard	<i>Phrynosoma blainvillii</i>	SSC	-
Northern California legless lizard	<i>Anniella pulchra</i>	SSC	-
San Joaquin coachwhip	<i>Masticophis flagellum ruddocki</i>	SSC	-
Western spadefoot	<i>Spea hammondi</i>	SSC	PT
~~E= Endangered~~, T=Threatened, C= Candidate for listing as Threatened and/or Endangered, SSC= Species of Special Concern, ~~FP= Fully Protected~~, PT=Proposed Threatened, (-)= None			

Attachment 3

Attachment 3

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM
(MMRP)**

PROJECT: City of Patterson 6th Cycle Housing Element

SCH No.: 2025111094

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Tricolored Blackbird (TRBL)	
Recommended Mitigation Measure 1: TRBL habitat assessments	
Recommended Mitigation Measure 2: TRBL surveys	
Recommended Mitigation Measure 4: TRBL take authorization	
Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 5: BUOW pre-construction surveys	
Recommended Mitigation Measure 7: BUOW take authorization	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 8: CBB habitat assessments	
Recommended Mitigation Measure 9: CBB pre-construction surveys	
Recommended Mitigation Measure 11: CBB take authorization	
Special-Status Species (SSS)	
Recommended Mitigation Measure 12: SSS habitat assessments	
Recommended Mitigation Measure 13: SSS pre-construction surveys	
<i>During Construction</i>	
Tricolored Blackbird (TRBL)	

Recommended Mitigation Measure 3: TRBL avoidance buffer	
Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 6: BUOW avoidance buffer	
Crotch’s Bumble Bee (CBB)	
Recommended Mitigation Measure 10: CBB avoidance buffer	
Special-Status Species (SSS)	
Recommended Mitigation Measure 14: SSS avoidance buffer	