



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Central Region  
1234 East Shaw Avenue  
Fresno, California 93710  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**MEGHAN HERTEL, Director**



March 3, 2026

James Silva, Manager  
St. Johns Water District  
P.O. Box 366  
Farmersville, California 93223  
(559) 747-1177  
[jsilva@cpdc1874.org](mailto:jsilva@cpdc1874.org)

**Subject: SK Vanderstelt Recharge Basin Project (Project)  
Initial Study and Mitigated Negative Declarations (MND)  
State Clearinghouse No.: 2026020040**

Dear James Silva:

The California Department of Fish and Wildlife (CDFW) received an MND from St. Johns Water District (SJWD) for the above referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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

### **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 purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

---

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

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 2

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, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

**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).

**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 Project.

**Water Rights:** The capture of unallocated stream flows to artificially recharge groundwater aquifers is subject to appropriation and approval by the State Water Resources Control Board (SWRCB) pursuant to Water Code section 1200 et seq. CDFW, as Trustee Agency, is consulted by SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Certain fish and wildlife are reliant upon aquatic and riparian ecosystems, which in turn are reliant upon adequate flows of water. CDFW therefore has a material interest in assuring that adequate water flows within streams for the protection, maintenance, and proper stewardship of those resources. CDFW provides, as available, biological expertise to review and comment on environmental documents and impacts arising from Project activities.

## **PROJECT DESCRIPTION SUMMARY**

**Proponent:** St. Johns Water District (SJWD)

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 3

**Objective:** The proposed Project consists of the construction of new recharge basin and associated infrastructure along the St. Johns River. The proposed three-cell recharge basin will be constructed within an approximate 1-mile reach of a high flow channel of the St. Johns River, allowing the channel to be utilized for groundwater recharge. The proposed Project also includes a new concrete diversion weir and turnout structure in the St. Johns River to divert flows to the proposed recharge basin and a downstream discharge structure that will enable the SJWD to return unused surface water to the main channel for downstream purposes.

**Location:** The Project is located just north of the City of Visalia in Tulare County, adjacent to the St. Johns River, between Road 122 and Pratt Road; Section 12, Township 18 south, Range 24 east, Mount Diablo Base and Meridian. The Project site is located within Assessor's Parcel Number's (APN's) 078-020-033, 078-070-011, and 078-110-002. The diversion weir and turn out structure is located at Latitude 36.371111, Longitude -119.308611; the discharge structure is located at Latitude 36.37222, Longitude -119.32278.

## COMMENTS AND RECOMMENDATIONS

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

The MND notes the Project site's surrounding land uses include agricultural areas and rural residential areas. The MND also notes the Project site includes elements within and along the banks of the St. Johns River which experiences season flows from agricultural and flood water releases from Kaweah Lake. Aerial Imagery shows a narrow riparian corridor along the St. Johns River and annual grasslands south of the Project site.

Currently, the IS acknowledges that the Project site is within the geographic range of several special-status animal species and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some these measures to reduce impacts to less than significant and avoid unauthorized take for several special-status animal species, including but not limited to: the State threatened Swainson's hawk (*Buteo swainsoni*); the State candidate western burrowing owl (*Athene cunicularia hypugaea*) and Crotch's bumblebee (*Bombus crotchii*); and the State species of special concern northwestern pond turtle (*Actinemys marmorata*). CDFW recommends that the following modifications and/or edits be incorporated into the MND, including proposed avoidance, minimization, and compensatory measures, prior to its adoption by the SJWD.

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 4

## **Swainson's Hawk**

The Project site is within the geographic range of Swainson's hawk (SWHA) and a historical occurrence was documented within  $4 \frac{3}{4}$  miles of the Project site (CDFW 2026). The Project's Biological Evaluation Report (BER) established that SWHA could nest in the vicinity of and forage within the Project site. The MND provides Mitigation Measure (MM) SH#2, SH#3 and SH#4 for a qualified biologist to conduct a pre-construction survey between March 1 and September 15, for SWHA nesting within  $\frac{1}{2}$  mile of the Project site within 30 days of construction activities, and if an active SWHA nest is found a suitable disturbance-free buffer zone will be implemented around any such nest. The buffer zone will be maintained until a biologist establishes that the young birds have fledged and are capable of foraging independently. MM SH#4 provides that if construction activities occur within a buffer zone, a qualified biologist will monitor the nest daily or weekly until construction activities stop or the nest is no longer active. The MND analysis does not provide a biological basis of how a no-disturbance buffer will be determined as adequate to avoid significant impacts, including but not limited to avoiding take of individuals through nest failure or other means, as a result of Project implementation. CDFW has concerns that the proposed MMs are not sufficient to avoid significant impacts and unauthorized take of SWHA could occur. As such, CDFW recommends the MND include the following measures:

### **Recommended Mitigation Measure 1: SWHA Protocol Surveys**

CDFW recommends that a qualified biologist conduct protocol surveys following the survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000) and be conducted the survey season immediately prior to construction.

### **Recommended Mitigation Measure 2: SWHA Avoidance Buffer**

If Project-specific activities will take place during the SWHA nesting season (i.e., March 1 through September 15), and active SWHA nests are present, CDFW recommends a minimum  $\frac{1}{2}$ -mile no-disturbance buffer be delineated and maintained around each nest, regardless of whether it was detected by surveys or observed incidentally. These buffers would 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 parental care for survival, to prevent nest abandonment and other take of SWHA as a result of Project activities.

### **Recommended Mitigation Measure 3: SWHA Take Authorization**

CDFW also recommends that in the event an active SWHA nest is detected, and a  $\frac{1}{2}$ -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 Incidental Take Permit (ITP), pursuant to

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 5

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).

The Project site is within the geographic range of BUOW and a historical occurrence was documented within 4 ¼ miles of the Project site (CDFW 2026). The Project's BER established that BUOW could be present within the Project site as suitable nesting, roosting, and foraging habitat exists on the Project site. MM BO#1 requires that prior to Project-related ground disturbance, a qualified biologist will conduct an avoidance survey in accordance with the methods described in the *2012 Staff Report on Burrowing Owl Mitigation* (CDFG 2012), and if BUOW are detected, CDFW will be consulted for avoidance measures and/or the need for an ITP. CDFW concurs with conducting an avoidance survey in accordance with CDFG 2012 and CDFW consultation for the need of an ITP. However, CDFW has concerns with part of MM BO#1 as it states, "If no burrowing owls are found no other action is required." The CDFG 2012 survey methods includes signs of BUOW presence such as artifacts such as BUOW tracks, molted feathers, cast pellets, etc. CDFW recommends MM BO#1 define BUOW presence to include all the methods described in the CDFG 2012 report and not just observations of BUOW individuals. CDFW also recommends the MND include the following measure:

#### **Recommended Mitigation Measure 4: 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 5: 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) is necessary to comply with CESA.

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 6

## **Crotch's Bumble Bee**

The Project site is within the range of Crotch's bumblebee (CBB). A recent (CDFW 2026) occurrence was documented approximately two miles southwest of the Project site. CBB are known to inhabit areas of grasslands, scrub habitat, and ruderal vegetation that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses, and these habitat elements may be present within the Project site. CBB primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, underneath brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014, Hatfield et al. 2015). Overwintering sites for CBB mated queens include soft, disturbed soil (Goulson 2010) or leaf litter or other debris (Williams et al. 2014). As such, CDFW recommends the following:

### **Recommended Mitigation Measure 6: CBB Habitat Assessment**

CDFW recommends a qualified biologist conduct a habitat assessment to determine if the 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 7: CBB Surveys**

In areas of suitable habitat, CDFW recommends that a qualified biologist conduct focused surveys for CBB following the methodology outlined in the *Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species* (CDFW 2023) during the vegetation blooming period prior to activities at Project sites.

### **Recommended Mitigation Measure 8: CBB Avoidance Buffer**

If CBB is detected, then 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 9: 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.

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 7

## **Northwestern Pond Turtle**

Northwestern pond turtle (NWPT) may potentially occur within the Project site (CDFW 2026), and a review of aerial imagery shows habitats that NWPT utilize for nesting, overwintering, dispersal, and basking, including streams, ponded areas, irrigation canals, and riparian and upland habitats are in and within the vicinity of the Project site. NWPT are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported (Thomson et al. 2016). Noise, vegetation removal, movement of workers, construction and ground disturbance as a result of Project activities have the potential to significantly impact NWPT populations. Without appropriate avoidance and minimization measures for NWPT, potentially significant impacts associated with Project activities could include nest reduction, inadvertent entrapment, reduced reproductive success, reduction in health or vigor of eggs and/or young, and direct mortality.

### **Recommended Mitigation Measure 10: NWPT Surveys**

CDFW recommends that a qualified biologist conduct focused surveys for NWPT within 10 days prior to Project implementation, and that focused surveys for nests occur during the egg-laying season of March through August.

### **Recommended Mitigation Measure 11: NWPT Avoidance and Minimization**

CDFW recommends that any NWPT nests that are discovered remain undisturbed with a no-disturbance buffer maintained around the nest until the eggs have hatched and neonates are no longer in the nest or Project site. If NWPT individuals are discovered at the site during surveys or Project activities, CDFW recommends that they be allowed to move out of the area of their own volition without disturbance.

## **Editorial Comments and/or Suggestions**

**Nesting Birds:** To protect nesting birds, CDFW recommends that Project ground-disturbing and vegetation-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced in this letter.

If the nesting season cannot be avoided, CDFW recommends that a qualified biologist conduct a pre-construction survey 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, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 8

movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project activities begin, 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 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 a compelling biological or ecological reason to do so, such as when the Project site 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.

**Lake and Streambed Alteration:** The Project includes the construction of a recharge basin within the St. Johns River high-flow channel, the construction of a weir, turnout, and discharge structures, and the diversion and storage of surface flow for groundwater within the high-flow channel. A Lake and Streambed Alteration Notification is warranted for these Project activities. Project activities as described will substantially change the bed, bank, and channel of streams and may substantially divert or obstruct the natural flow of streams making them subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity 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 (including the removal of riparian vegetation); (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 and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement; therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for Lake or Streambed Alteration Agreement issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 9

**Stream Hydrology:** The MND does not specify the annual volume (acre-feet) of surface flow that will be diverted to groundwater storage and does not analyze potential impacts to downstream hydrology along the St. Johns River from Project implementation. Without the appropriate information to discern potential impacts, CDFW is concerned that the Project may result in direct and cumulative adverse impacts to the fish and wildlife and other public trust resources supported by the St. Johns River and associated riparian habitats, and that any proposed reduction in surface flow will affect the sustainability of the riparian and aquatic habitats within the stream. CDFW recommends that the MND be amended and recirculated with a hydrologic study or other information that identifies and analyzes the impacts of surface water reduction on the riparian and aquatic habitats associated with the St. Johns River and the species supported by these habitats, and includes appropriate measures to avoid, minimize, and mitigate potential biological impacts due to surface flow reduction.

**Water Rights:** The MND does not specify whether the Project diverts unallocated surface flow for the purpose of groundwater storage. As stated previously, the capture of unallocated stream flows to artificially recharge groundwater aquifers is subject to appropriation and approval by the SWRCB pursuant to Water Code section 1200 et seq. CDFW recommends that the MND include a detailed description of the water rights and water entitlements that would pertain to the Project and address any applications or change petitions that SJWD will be filing. CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Given the potential for impacts to sensitive species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

**CNDDB Positive Submission of Data:** Please note that the California Natural Diversity Database (CNDDDB) is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDB does not mean a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified wildlife biologist/botanist 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 at or near the Project site.

## **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, §

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 10

21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

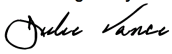
## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 MND to assist the SJWD in identifying and mitigating Project 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>). A Mitigation and Monitoring Program (MMRP) (Attachment 1) is included to assist the SJWD with incorporating the recommended mitigation measures provided above. Questions regarding this letter or further coordination should be directed to Jackson Powell, Environmental Scientist, at (559) 899-9758 [Jackson.Powell@wildlife.ca.gov](mailto:Jackson.Powell@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
FA83F09FE08945A...  
Julie A. Vance  
Regional Manager

ATTACHMENT- MMRP Table

ec: State Clearinghouse  
Land Use and Climate Innovation  
[State.Clearinghouse@lci.ca.gov](mailto:State.Clearinghouse@lci.ca.gov)

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 11

U.S. Fish and Wildlife Service  
Matt Nelson  
[mattew\\_nelson@fws.gov](mailto:mattew_nelson@fws.gov)

James Silva, Manager  
St. Johns Water District  
March 3, 2026  
Page 12

## **References**

- California Department of Fish and Game (CDFG). 2012. Staff Report on Burrowing Owl Mitigation. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>
- California Department of Fish and Wildlife (CDFW). 2026. Biogeographic information and observation system (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 17 February 2026.
- Goulson, D. 2010. Bumblebees: behaviour, ecology, and conservation. Oxford University Press, New York. 317pp.
- Hatfield, R., S. Jepsen, R. Thorp, L. Richardson. and S. Colla. 2015. Bombus crotchii. The IUCN Red List of Threatened Species. <https://www.iucnredlist.org/species/44937582/46440211>
- Swainson's Hawk Technical Advisory Committee (SWHA TAC). 2000. Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83990&inline>
- Thomson, R. C., A. N. Wright, and H. B. Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife and University of California Press.
- Williams, P. H., R. W. Thorp, L. L. Richardson, and S .R. Colla. 2014. Bumble bees of North America: An Identification guide. Princeton University Press, Princeton, New Jersey. 208 pp.

# Attachment 1

**Attachment 1**

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

**PROJECT: SK Vanderstelt Recharge Basin (Project)  
Initial Study/ Mitigated Negative Declaration (IS/MND)  
SCH No.: 2026020040**

<b>RECOMMENDED MITIGATION MEASURE</b>	<b>STATUS/DATE/INITIALS</b>
<b>Before Disturbing Soil or Vegetation</b>	
Swainson's Hawk (SWHA)	
<b>Recommended Mitigation Measure 1:</b> SWHA Protocol Surveys	
<b>Recommended Mitigation Measure 3:</b> SWHA Take Authorization	
Western burrowing owl (BUOW)	
<b>Recommended Mitigation Measure 5:</b> BUOW Take Authorization	
Crotch's bumble bee (CBB)	
<b>Recommended Mitigation Measure 6:</b> CBB Habitat Assessment	
<b>Recommended Mitigation Measure 7:</b> CBB Surveys	
<b>Recommended Mitigation Measure 9:</b> CBB Take Authorization	
Northwestern pond turtle (NWPT)	
<b>Recommended Mitigation Measure 10:</b> NWPT Surveys	
<b>During Construction</b>	
Swainson's Hawk (SWHA)	
<b>Recommended Mitigation Measure 2:</b> SWHA Avoidance Buffer	
Western burrowing owl (BUOW)	
<b>Recommended Mitigation Measure 4:</b> BUOW Avoidance Buffer	

Crotch's bumble bee (CBB)	
<b>Recommended Mitigation Measure 8:</b> CBB Avoidance	
Northwestern pond turtle (NWPT)	
<b>Recommended Mitigation Measure 11:</b> NWPT Avoidance and Minimization	