



**CEQA STATUTORY EXEMPTION FOR RESTORATION PROJECTS (SERP) CONCURRENCE REQUEST**

Completion and submission of this form is voluntary. This form may be submitted to request concurrence from the Director of Fish and Wildlife pursuant to Public Resources Code section 21080.56.

The Lead Agency may submit this signed form (pdf) and all attachments via the Department’s [Environmental Permit Information Management System \(EPIMS\) Document Repository](#) or via email at [restorationpermitting@wildlife.ca.gov](mailto:restorationpermitting@wildlife.ca.gov).

**1. LEAD AGENCY**

Lead Agency Name:	East Merced Resource Conservation District
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**2. PROJECT PROPONENT**

Check Box and Skip to Number 3 if Same as Lead Agency

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Contact Person’s Name:	Laurel Sebastian
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**3. PROJECT INFORMATION**

A. Project Name:	Sweetwater Restoration Project
B. County or Counties:	Merced
C. Lat./Long. Coordinates:	37.197326, -120.740169
D. Estimated Project Start/End Dates:	June 2026 – May 2035

E. Provide a brief description of the future discretionary Project approval the Lead Agency is considering (see CEQA Guidelines sections 15352 and 15378) and an approximate date range for when the Lead Agency may make that approval if the Lead Agency obtains a SERP concurrence from CDFW.

East Merced Resource Conservation District (EMRCD) (Lead Agency) is a special district of the state and endorses the Sweetwater Restoration Project (Project) for the protection of local natural resources in and around the district. The Project will be undertaken by River Partners with technical planning assistance provided by EMRCD. EMRCD is also considering providing implementation funding to support pollinator habitat components of the Project with their existing grant funds. If the Lead Agency obtains a SERP concurrence from CDFW, they will make their board approval of the Project in the following monthly board meeting (~March 2026).



F. Provide a brief description of the Project location, size, and funding sources. Please cite and attach any supporting documents.

The Project site is located in the Northern San Joaquin Valley, 10 miles northeast of the City of Los Banos in Merced County (Appendix A). The Project is accessed from Sand Slough Road in the City of Dos Palos. The Project is about half a mile east of the San Luis National Wildlife Refuge and the historic channel of the San Joaquin River. The site occurs within Township 8 South, Range 11 East, in Section 34 and 35 on the Mount Diablo Principal Meridian.

The Project parcel is 560 acres, including nearly 500 acres of irrigated annual agricultural fields targeted for restoration. The remaining acreage consists of roads, irrigation ditches, and Mariposa Slough, and is characterized by bare soil and native and non-native vegetation.

Project funding for property acquisition and restoration planning has been provided through the California Wildlife Conservation Board (WCB). A Project planning partner, the California Waterfowl Association (CWA), applied for North American Wetland Conservation Act funding to support the first phase of restoration on 100 acres. The first application was not funded, but CWA will likely resubmit in March. EMRCD plans to provide pollinator habitat funding via the CARCD-WCB Climate and Wildlife: Monarch Habitat grant if SERP concurrence is issued for the Project. Additional implementation funding from WCB and/or other sources will be pursued in early 2026.

G. Provide a brief Project description, including any post-restoration work, operation and maintenance, or other related activities. Summarize the Project's expected environmental benefits (e.g., acres or stream-miles restored/enhanced, species benefitted, etc.). Please cite and attach any supporting documents.

At the local scale, the Project site has undergone a history of cattle grazing, land clearing and conversion to cropland, and the subsequent introduction of invasive weeds. At the watershed scale, wetland drainage, channelization, levee construction, and rerouting of river systems have altered local hydrology and eliminated natural flood dynamics. Together, these alterations and disruptions have degraded native biodiversity and ecosystem function at the Project site. Current site conditions and 40+ years of experimental work in restoration highlight the need for active restoration approaches to reestablish habitat and maximize benefits to native species (Miguel et al., 2020).

The Project aims to transform up to 500 acres of farmland along two miles of Mariposa Slough into a self-sustaining mosaic of native grassland, wetland, and riparian habitats (Appendix B). Primary Project goals include supporting wildlife, enhancing habitat connectivity, and promoting groundwater sustainability and climate resilience. This Project will convert an agricultural area that poses an active risk to wildlife through its lack of cover and forage and regular applications of pesticides into a complex of native vegetation. Targeted habitat resources include canopy trees to provide perching habitat for raptors, dense understory thickets for riparian songbirds, mixed grassland cover for declining grassland birds, seasonal pools to support shorebirds, and diverse nectar and pollen producing plants which provide forage for pollinators year-round. Site preparation, restoration planting, and maintenance activities are all designed to maximize restoration success.

Restoration is projected to begin in late 2026 with site preparation of the fields. The Project may be broken into multiple phases depending on funding availability. Site preparation includes using standard agricultural equipment and techniques to mow, disk, and remove buried drip irrigation and agricultural planting beds. Minor modifications to topography will mimic nearby remnant sites and create diverse microhabitats in fields that are currently laser leveled for agricultural production (Appendix C). Shallow swales and depressions (less than two feet below current field elevations) will be reintroduced to convey and hold water for plants and wildlife (Appendix B). All soil moved (up to 150,000 cubic yards) will be retained on site in the form of vegetated islands within the fields and berms along field edges (less than three feet above existing field height). Manmade boxes and pipes may be buried within these berms to create underground dens suitable for burrowing owl (*Athene cunicularia*) nesting. No earthwork or other types of site preparation is planned within Mariposa Slough as part of this Project.

Following site preparation, restoration planting techniques to establish diverse native vegetation on up to 500



acres will include drill or broadcast seeding, and cutting, plug and potted plant installation. Plant materials will be collected and propagated primarily from remnant and restored habitats within Stanislaus and Merced counties to maintain local ecotype genetics. Supplemental plant materials will also be sourced from local nurseries that provide regionally appropriate plants, prioritizing plant sources from within 50 miles or less of the Project site. In the small areas of non-cultivated cover (e.g., roadsides and the 1.3 acre enhancement area in the northwest corner of the property), the habitat may be improved by removing weeds, adding native seed or plants, and removing trash. Minor improvements to Mariposa Slough may include planting, seeding, and maintenance of the existing weirs and pumps to support wildlife habitat and restoration.

A combination of flood, drip, and sprinkler irrigation systems will be installed or improved in the first year of the Project to help germinate and establish young plants with supplemental water while they develop deeper root systems. Maintenance of any planting areas' topography to allow for flood irrigation will occur before restoration planting. Up to nine flashboard dam water control structures (one per field) will be installed into field edges or berms to hold supplemental water at the lowest field elevations and establish seasonal wetland or riparian habitat. When released from flashboard dams or field drainage pipes, excess water will return to Mariposa Slough or existing ditches on site. Improvements to existing irrigation pipelines, canals, and ditches, and installation of drip and/or sprinklers may occur before or after restoration planting. Temporary sprinkler and drip irrigation systems used for establishing vegetation will be removed by the end of the three-year maintenance period, but some pump, canal, pipe, and flashboard dam infrastructure may be left in place. Once plant establishment watering ceases after three years, the conversion of agricultural land to native vegetation will reduce the site's overall water consumption up to roughly 1,400 acre-feet per year (current farmer Kirk Teixeira, personal correspondence).

Invasive species within the Project will be treated throughout the Project timeline using an integrated pest management approach, employing a combination of mechanical and chemical control methods designed to minimize herbicide use to the greatest extent practicable. Management tools may include mowing, wicking, hand weeding, herbicide spraying, burning, and dense native seeding to suppress non-native annual plant populations.

Once restoration planting is complete, the Project will enter a three-year maintenance period. If the Project is broken into multiple phases of implementation, three years of maintenance will be included in each phase. Project maintenance activities include watering, irrigation system maintenance, road and fence repairs, weed management, and supplemental seeding and planting to support native plant establishment. By the end of this establishment period, the vegetation is expected to be self-sufficient, requiring only routine seasonal management by River Partners or a future landowner to address ongoing weed pressure.

Collectively, the Project will expand and enhance native habitat within a stretch of the San Joaquin River corridor that is otherwise dominated by agricultural lands offering limited wildlife value. By restoring croplands, the Project will demonstrate effective strategies for transitioning land out of agriculture, reducing long-term water use, and minimizing soil disturbance in the San Joaquin Valley, an area that may retire over half a million acres of farmland from production to reach groundwater sustainability targets (Hanak et al., 2019). Together, these actions will significantly improve ecological function and provide high-quality habitat for a diverse range of wildlife, including songbirds, small mammals, and pollinators.

- Hanak, Ellen, et al. (2019). Water and the future of the San Joaquin Valley. Public Policy Institute of California Water Policy Center.
- Miguel, M. F., Butterfield, H. S., & Lortie, C. J. (2020). A meta-analysis contrasting active versus passive restoration practices in dryland agricultural ecosystems. *PeerJ*, 8, e10428.



H. CDFW recommends direct coordination with all interested California Native American tribes. Please provide a summary of the Lead Agency's engagement with tribes. Be careful not to include any sensitive or confidential information. Please cite and attach any supporting documents.

The Lead Agency has directed the Project Proponent, River Partners, to coordinate with interested California Native American tribes. For initial site background research and outreach, River Partners submitted a request to the California Historical Resources Information System through the California State University (CSU) Stanislaus Department of Anthropology and reviewed their records search. River Partners' Director of Tribal Engagement, Mr. Austin Stevenot (Northern Sierra Mewuk), initiated email outreach on October 5, 2025 to introduce the Project and invite engagement by the Tule River Indian Tribe, the Southern Sierra Miwuk Nation, and the Northern Valley Yokuts/Ohlone Tribe. A representative from Northern Valley Yokuts expressed interest in another restoration project nearby but declined interest in engaging further in this Project. On January 6, 2026, River Partners contacted a Southern Sierra Miwuk Nation representative by phone to discuss the Project and on January 15, 2026, Austin Stevenot briefly discussed the Project with another Southern Sierra Miwuk Nation representative. Both representatives expressed interest in learning more, and in-person meeting to discuss this Project and others is set for February 9. River Partners called two Tule River Indian Tribe contacts on January 22, 2026 and left messages about the project. As of this submittal, no responses related to this Project have been received from the Tule River Indian Tribe. As the Project progresses, River Partners plans to continue to look for opportunities for direct tribal involvement in Project design and implementation.

The Project is one component of the larger complex of habitat restoration projects on the San Joaquin River corridor led by River Partners over the last decade. During that time, we have developed strong relationships with members of the California Indian Basketweavers' Association (CIBA) to establish accessible collection locations and incorporate culturally significant plants into restoration palettes. The Project will continue to support that effort by creating another site with culturally significant plants that could be sustainably collected for baskets and other uses after Project completion.



I. CDFW recommends public outreach and coordination with interested parties and public agencies. Please provide a summary of the Lead Agency’s engagement with interested parties and public agencies. Please cite and attach any supporting documents.

River Partners’ communications approach ensures projects receive appropriate public visibility. Our public communications are designed to highlight agency leadership and investment, demonstrate public-private collaboration and connect projects to community, ecological, and economic benefits through proactive storytelling with consistent updates, site tours, and open dialogue to build credibility. Our public outreach focuses on key audiences including media, landowners, municipalities, Tribes, agencies, legislators, the conservation community, and local communities. Methods and channels for public outreach include direct outreach for one-on-one engagement, public outreach through site tours, workshops, community meetings, strategic press releases, milestone announcements, opinion pieces in news outlets, blogs, dedicated project webpages, social media content, and video shorts. This approach ensures that projects receive positive coverage and build broad community and stakeholder support.

As a result of this public outreach and coordination effort, this Project has been featured in three public blogs, two email newsletters, eight Facebook posts, and three Instagram posts. We have also developed a Project summary sheet and story map to share at public events and meetings. Links to all of the above are available at [Sweetwater - River Partners](#).

In 2021-2022, The Nature Conservancy (TNC) and Renewable Resources Group (RRG; a local landowner) contracted River Partners to analyze potential conservation outcomes for the area in an Opportunities and Constraints Analysis. As part of that analysis, River Partners engaged with 26 key individuals representing 18 stakeholder groups including EMRCD, CDFW, U.S. Fish and Wildlife Service (USFWS), U.S. Bureau of Reclamation: San Joaquin River Restoration Program, Audubon California, Grassland Water District, Lower San Joaquin Levee District, University of California Merced, and University of California Davis. Since 2024, under the current restoration planning process, River Partners has led multiple meetings and site visits to gather Project input from the partners listed above as well as Turner Island Water District, California Waterfowl Association, Central Valley Joint Venture, Hansen Biological Consulting, and the Tricolored Blackbird Working Group. Additional monitoring, research, and planning partners, including Stanford University, HydroFocus Inc., Point Blue Conservation Science, Cal eDNA, and WRA Environmental Consultants have contributed to ecological assessments of the site and design development.

River Partners Project Manager, Laurel Sebastian, presented about the Project at the California Native Grassland Association Symposium in February 2025, and led a site tour for the San Joaquin Valley Monarch Collaborative in April 2025. River Partners and EMRCD have also discussed the Project with neighboring landowners and farmers including RRG, Teixeira & Sons, Bowles Farming, and D&D Duck Club.

Engagement will continue through presentations, newsletters, site tours, community volunteer events, and participation in local conferences.



#### 4. REQUIRED DETERMINATIONS

Using substantial evidence and best available science, provide a determination and explanation for each SERP criteria listed below:

A. The Project is exclusively one or both of the following: (1) a project to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, or (2) a project to restore or provide habitat for California native fish and wildlife.

EMRCD has determined that the Project is exclusively a project to conserve, restore, protect, or enhance and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and a project to restore or provide habitat for California native fish and wildlife.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

Over 90% of riparian habitats in California’s Central Valley have been lost to channelization, urbanization, agricultural conversion, and water diversion, and what remains is often degraded (Garone, 2006). The Project’s position along the San Joaquin River corridor is strategically important, as it provides an opportunity to strengthen wildlife connectivity between the San Luis National Wildlife Refuge and Merced National Wildlife Refuge, helping to stitch together fragmented habitat patches across the region and state.

Project activities are designed to restore and enhance native plant communities and wildlife habitat by conducting targeted site preparation, weed management, planting, seeding, and supplemental watering. Collectively, these actions support the establishment of native vegetation and the recovery of ecological processes that are essential to a healthy, structurally diverse ecosystem.

The restoration of native habitat at Sweetwater will expand available habitat within a landscape that has been altered for human benefit with minimal regard for wildlife. Reestablishing riparian forests, grasslands, and associated communities will initiate early-successional dynamics that create varied structural conditions capable of supporting a wide range of native species, common and imperiled, including resident and migratory birds, mammals, reptiles, amphibians, and pollinators.

##### References

- Garone, P.F. (2006). *The fall and rise of the wetlands of California’s Great Central Valley: A historical and ecological study of an endangered resource of the Pacific Flyway*. University of California, Davis.



B. An eligible project may have incidental public benefits, such as public access and recreation.

EMRCD has determined that the Project may have incidental public benefits.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

The conversion of the land from agriculture to native habitat is expected to provide incidental public benefits in the form of improvements to water quantity, water quality, and air quality for surrounding communities (Fernandez-Bou et al., 2023). Retiring the land will reduce water and air pollution via the elimination of pesticide, herbicide and fertilizer applications, regular tilling, and diesel farm equipment operations. Once the Project is completed, the need for pumped groundwater supplied by wells across Turner Island Water District will be eliminated at the site. Due to rotation crop practices and water shortages, up to half the Project fields are currently fallowed each year, so establishing permanent vegetation cover on site will permanently reduce soil exposure to wind and water erosion. Dust pollution from fallowed farmland has been increasing across the Central Valley and has significant negative impacts to air quality, public health, and the regional climate via increased snowmelt and precipitation intensity (Adebiyi et al., 2025).

The Project will also establish new pollinator habitat with a diversity of flowering species and a nearly year-long floristic window supporting increased abundance and diversity of pollinator species at the site. By extension this benefit to pollinator populations, both common and imperiled, will benefit nearby agricultural operations that rely on insect pollination of food crops, a highly valuable ecosystem service provision (Wratten et al., 2012).

River Partners intends to transfer ownership of the Project site to another entity, such as a California Native American tribe, California State Parks, or the USFWS for long-term management after completion of the Project. River Partners has acquired USFWS feedback throughout the Project planning process to ensure that the Project is compatible with USFWS interests and projected management capacities. The Project is not currently within the USFWS acquisitions boundary, but USFWS staff have expressed interest in adding the parcel to their acquisitions boundary to assist in possible ownership transfer in the future. River Partners will maintain management responsibility of the site until a suitable landowner is identified. The long-term manager of the land may open the restored land to the public for recreational activities like hiking and birdwatching. The Project does not include any construction of recreational facilities, such as bathrooms, hiking trails, or parking lots.

#### References

- Adebiyi, A.A., Kibria, M.M., Abatzoglou, J.T. et al. (2025). Fallowed agricultural lands dominate anthropogenic dust sources in California. *Communications Earth & Environment*, 6, 324. <https://doi.org/10.1038/s43247-025-02306-0>
- Alam, S., Gebremichael, M., Li, R., Dozier, J., & Lettenmaier, D. P. (2020). Can Managed Aquifer Recharge mitigate the groundwater overdraft in California's Central Valley?. *Water Resources Research*, 56, e2020WR027244. <https://doi.org/10.1029/2020WR027244>
- Fernandez-Bou, Angel Santiago, et al. (2023). Water, environment, and Socioeconomic Justice in California: A multi-benefit cropland repurposing framework. *Science of The Total Environment*, 858, 159963, <https://doi.org/10.1016/j.scitotenv.2022.159963>.
- Wratten, Stephen D., et al. (2012). "Pollinator habitat enhancement: benefits to other ecosystem services." *Agriculture, Ecosystems & Environment* 159: 112-122.



C. The Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

EMRCD has determined that the Project does both of the following: (1) Results in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and (2) Includes procedures and ongoing management for the protection of the environment.

For each criterion below, please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

**Long-Term Net Benefits to Climate Resiliency:**

Riparian forests and wetlands have been identified by the U.S. Department of Agriculture as critically at risk due to climate change, yet incredibly important in their ability to improve local water quality, build healthy soil, and provide habitat to a diverse group of wildlife (USDA, 2024). Restoration at the Project site will provide long-term multi-benefits to climate resiliency by:

- **Sequestering carbon dioxide**

The Project will sequester carbon in soil and plant biomass through the planting of native perennial and annual plants. The Project is projected to sequester approximately 1,800 tons of carbon in the first 10 years within the 74 acres planned for riparian forest alone, and other vegetation communities would sequester additional carbon (Matzek and Stella, 2018). In fact, restoration from agriculture to native vegetation is consistently one of the leading ways to sequester soil carbon in grassland systems, with an average soil sequestration rate of 0.38 tons carbon/acre per year, or 190 tons carbon per year across the Project site (Conant et al., 2017).

- **Re-establishing diverse & resilient native habitat**

The Restoration Planting Plan includes over 40 native grasses, forbs, and woody plant species grown from locally sourced seed to preserve local ecotypes and build in as much diversity and abundance of food and habitat resources for wildlife as is practicable (Attachment 1). Moreover, this Project's investment in native plants helps push forward the critical science of native plant collection, propagation and restoration even as human impacts and climate change are driving the fastest losses of biodiversity seen in eons. Biodiverse systems are more likely to persist and retain ecosystem function in stressful conditions including drought and invasion by non-native species (Tilman and Downing, 1994).

- **Providing climate refugia via habitat diversity and connectivity**

The Project will reintroduce high quality habitat for a range of wildlife species, providing opportunities for foraging, nesting, and shelter. As native woody vegetation matures it will form a forested canopy and provide localized cooling effects during peak heat events compared to the existing condition in a very heat-stressed region, benefiting both onsite and nearby offsite temperature conditions. Moreover, the proximity of the site to National Wildlife Refuges will expand an important wildlife corridor and help wildlife move across the landscape to suitable habitats during acutely stressful weather events as well as longer term climate shifts.

- **Supporting groundwater sustainability**

After the establishment period is complete, the Project will reduce ground and surface water deliveries up to 1,400 acre-feet per year (Kirk Teixeira, personal correspondence), supporting nearby rivers, groundwater dependent ecosystems, and water supplies.

**References**

- Conant R.T., Cerri C.E.P., Osborne B.B., and Paustian K. (2017). Grassland management impacts on soil carbon stocks: a new synthesis. *Ecological Applications*, 27, 662–668
- Matzek, V., Stella, J., and Ropion, P. (2018). Development of a carbon calculator tool for riparian forest restoration. *Applied Vegetation Science*, 21(4), 584-594.
- Tilman, D., and J. A. Downing. (1994). Biodiversity and stability in grasslands. *Nature*, 367:3.



- USDA. “Northwest Riparian Areas and Wetlands in a Changing Climate.” *USDA Climate Hubs*, [www.climatehubs.usda.gov/hubs/northwest/topic/northwest-riparian-areas-and-wetlands-changing-climate](http://www.climatehubs.usda.gov/hubs/northwest/topic/northwest-riparian-areas-and-wetlands-changing-climate). Accessed 2 Aug. 2024.

Long-Term Net Benefits to Biodiversity:

After nearly a century in agricultural production and with a levee isolating it from the San Joaquin River, the Project site lacks the conditions needed for native vegetation to reestablish on its own. Native seed sources in the surrounding landscape are limited, while non-native plants are well established onsite, making passive restoration unlikely (Miguel et al., 2020). This Project will support a wide variety of bird, insect, and mammal species through the restoration of riparian, wetland and grassland habitat. The Project will provide the following long-term net benefits to biodiversity:

- Native vegetation grown from locally sourced seeds. Local ecotypes and regional diversity will be preserved by sourcing most seeds from within a 50-mile radius of the Project site. This is especially possible after a three-year effort by River Partners and Heritage Growers to collect dozens of species from the San Luis National Wildlife Refuge and across the San Joaquin Valley, filling a long-standing gap in native seed supplies. Establishing robust native plant communities will also restore natural ecosystem processes and suppress invasive plant species including European annual grasses, bull thistle (*Cirsium vulgare*), and bristly oxtongue (*Helminthotheca echioides*).
- An increase in abundance and diversity of forage supporting an increase in abundance and diversity of herbivorous species, including mammals, birds, and insects, and the predatory mammals, birds and insects that together comprise the food web. This will support biodiversity immediately and over time by providing habitat in an area previously utilized by agriculture.
- Enhanced breeding habitat for a variety of wildlife species, including milkweed (*Asclepias spp.*) for western monarch butterfly (*Danaus plexippus plexippus*) egg-laying, varieties of nesting substrates and heights for grassland and riparian birds, and dense cover for mammals.
- Increased topographic diversity, reversing decades of laser-leveling and allowing microhabitat diversity to mature over time in swales, depressions, berms and islands. In a more complex landscape, plants and animals will be more likely to find their particular habitat requirements.
- Increased habitat connectivity and expansion of existing habitat. Interconnectivity and overall size of habitat area are among the strongest ecological factors of habitat quality and ability to support healthy and biodiverse wildlife populations. Sweetwater will add habitat to the 240,000-acre Grasslands Ecological Area, the largest remaining wetland complex in the western United States and a Ramsar wetland of international importance (Ramsar, 2024). The Project site is also considered part of an “Irreplaceable and Essential Corridor” by CDFW, showcasing the potential of this property to contribute to a cross-state wildlife habitat corridor (CDFW, 2024) (Appendix D).
- Retiring the existing agricultural use of an estimated 65 pounds of pesticide and herbicide and 150 pounds of nitrogen-based fertilizer per acre annually, indefinitely (UC IPM, 2025). This will reduce ecotoxicological impacts to a wide range of invertebrate and vertebrate species and will improve water quality in Mariposa Slough and the San Joaquin River via reduced nitrification. Improving water, soil, and air quality and reducing the application of chemicals meant to kill insects will make the site more suitable to sensitive species that cannot tolerate such pollution, increasing the overall biodiversity of the site.

References

- CDFW. (2024). “Areas of Conservation Emphasis.” *California Department of Fish and Wildlife - ACE*, [apps.wildlife.ca.gov/ace/](https://apps.wildlife.ca.gov/ace/). Accessed 25 June 2024.
- Miguel, M. F., Butterfield, H. S., & Lortie, C. J. (2020). A meta-analysis contrasting active versus passive restoration practices in dryland agricultural ecosystems. *PeerJ*, 8, e10428.



- Ramsar. (2024). “Grassland Ecological Area.” <https://rsis.ramsar.org/ris/1451>. Accessed 20 May 2024.
- UC IPM. “Tomato Pest Management Guidelines: Fertilization.” *UC Statewide IPM Program*. Dec. 2013, [ipm.ucanr.edu/agriculture/tomato/fertilization/#gsc.tab=0](http://ipm.ucanr.edu/agriculture/tomato/fertilization/#gsc.tab=0). Accessed 26 Nov. 2025.

#### Long-Term Net Benefits to Sensitive Species Recovery:

Restoring high-quality habitat at the Project site has the potential to support the recovery of sensitive species as well as benefit more common wildlife that are increasingly strained by habitat loss across the Central Valley.

#### • Resident and migratory bird support

Resident and migratory birds are likely to use the Project site’s restored vegetation communities for breeding, foraging, migration stopovers, and overwintering. Sensitive avian species like the yellow-billed cuckoo (*Coccyzus americanus*, Endangered Species Act (ESA) threatened) and least Bell’s vireo (*Vireo bellii pusillus*, ESA endangered) are key indicators of ecosystem health and their populations have suffered due to riparian habitat loss (Gardali et al., 2006). This Project is designed to provide successional riparian forest favorable to least Bell’s vireo and may be utilized by the species after restoration occurs. The complex of marsh habitat within Mariposa Slough and grassland and riparian habitat on the restored fields could provide a suitable habitat matrix for many wildlife common and sensitive species including northern harrier (*Circus hudsonius*, CDFW Species of Special Concern (SSC)) and Swainson’s hawk (*Buteo swainsoni*, CA Endangered Species Act (CESA) threatened), two species that have been recently recorded in the area. The largest population of wintering lesser sandhill cranes (*Grus canadensis canadensis*, SSC) roost at nearby Merced National Wildlife Refuge. The Project will supply grassland foraging habitat for the lesser sandhill cranes and protect the site from conversion to trees or other unsuitable cover that has negatively impacted the species (Littlefield 2008).

Tricolored blackbirds (*Agelaius tricolor*, CESA threatened, SSC) are known to nest at San Luis National Wildlife Refuge and Merced National Wildlife Refuge, suggesting that individuals are already present in the area and are likely to return following restoration. Tricolored blackbird breeding colonies require open water, thorny or dense protective vegetation for nesting, and abundant foraging habitat within five kilometers. The tule marshes found in Mariposa Slough are likely to provide nesting habitat, while the restored grassland area will provide abundant forage. Additionally, thickets of California blackberry (*Rubus ursinus*) and California rose (*Rosa californica*) will be planted to provide additional protective nesting habitat within the restored fields.

#### • Pollinator breeding support

A diverse assemblage of native vegetation also supports sensitive insect species such as the western monarch butterfly (ESA candidate) and Crotch’s bumble bee (*Bombus crotchii*, CESA candidate). The restoration is designed to provide year-round nectar producing plants, as well as incorporate native milkweed to provide breeding habitat, two key components of monarch recovery per the Xerxes society (Pelton et al., 2019). Open grassland habitat, diverse pollen resources, and the cessation of annual tilling will provide a safe place for Crotch’s bumble bee nesting underground or under plant litter (CDFW, 2019).

#### • Mixed grassland wildlife support

Reintroducing microtopography may support the return of several sensitive species that rely on specific microhabitat conditions. The shallow depressions created on site will settle over time without annual tilling and where soil clay content is high, the Project could one day support species that need seasonal ponding including three federally listed species of fairy shrimp: *Branchinecta conservatio*, *Branchinecta longiantenna*, and *Branchinecta lynchi*. The cessation of tilling and creation of high points would allow burrowing species including burrowing owl (CESA candidate) to safely use the site without burrows being destroyed by tilling actions or flooding. Burrowing owls nest underground often in burrows created by California ground squirrels (*Otospermophilus beecheyi*), which are found in the area and could naturally recolonize the site after restoration (Hennessy et al. 2015). The Project may also include artificial burrowing owl nesting structures buried within the constructed berms to provide underground owl dens before ground squirrels or other



burrowing species recolonize the site.

#### References

- California Department of Fish and Wildlife. (2019). *Report to the Fish and Game Commission: Evaluation of the petition from The Xerces Society, Defenders of Wildlife, and The Center for Food Safety to list four species of bumble bees as endangered under the California Endangered Species Act* (Report). <https://nrm.dfg.ca.gov/filehandler.ashx?documentid=166804&inline>
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#### Procedures for the Protection of the Environment:

During the implementation of the Project, River Partners will take precautions and implement the following best-management practices (BMPs) to ensure the surrounding environment and wildlife species are protected.

##### • Worker environmental awareness training

Prior to the start of any on-site work activities, all personnel involved in the Project will undergo environmental awareness training focused on BMPs and wildlife protection protocols. This training will ensure that all workers are fully informed of site-specific environmental sensitivities, any compliance requirements, and procedures designed to minimize disturbances to local wildlife and their habitats.

##### • Vehicles and equipment

All vehicles and equipment used on-site will adhere to a speed limit of 10 mph or less and be regularly inspected and properly maintained to prevent leaks of fuels, oils, or other substances that could harm aquatic or terrestrial life. Staging and storage areas for equipment, materials, fuels, lubricants, and solvents will be located outside of the floodplain and away from streams or other water features. Vehicles and heavy equipment are prohibited from operating on riverbanks, in standing water, wetlands, or other sensitive habitats without necessary permits. Refueling of equipment and vehicles will occur at least 150 feet from any body of water to minimize the risk of contamination.

##### • Erosion control

Due to the Project site's relatively flat topography and separation between fields and Mariposa Slough by elevated roads, no adverse impacts to adjacent waterways are expected from stormwater runoff or erosion during restoration activities. River Partners will implement standard erosion-control practices, namely understory seeding to help soils remain stable. In addition, no ground-disturbing work will occur during rain events of ¼ inch or more or within 24 hours following such weather events.

##### • Vegetation precautions

No sensitive plant species were identified on site in California Natural Diversity Database records



or observed during baseline vegetation surveys. Nonetheless, River Partners will avoid impacts to any sensitive plants encountered during implementation and will protect all mature native trees and shrubs.

**• Wildlife protections**

River Partners will conduct pre-implementation surveys to identify the presence of sensitive wildlife species prior to starting Project activities. If sensitive species are detected, then additional protective measures, including modified work practices, boundaries, and continued monitoring, will be implemented during site preparation, planting, and maintenance activities to minimize potential impacts.

**• Mowing**

Mowing will occur as needed to help control invasive weeds. Equipment will be set to a minimum height of four inches to prevent soil scalping and soil disturbance. If mowing is necessary during the nesting bird season, it will be preceded by any required nesting bird surveys, and operators will respect all no-disturbance buffers established by biologists.

**• Prescribed burning or grazing**

Burning or grazing may be pursued as vegetation management strategies to promote biodiversity and control invasive species. Any prescribed burning will be conducted by qualified fire practitioners, specialists in habitat restoration and fuel management, and carried out in accordance with established burn protocols or permits. Any grazing, if pursued, will follow a grazing management plan to maximize habitat benefits and minimize any adverse impacts.

**• Herbicide measures**

River Partners will implement herbicide application in accordance with product labels, local, state, and federal regulations, ensuring that only properly licensed personnel conduct the work. Herbicides will be used solely within the Project boundary and will be applied with careful consideration to sensitive resources including open water habitats. All work activities will generally be confined to daylight hours with the exception of herbicide application, which may occur before dawn to comply with Merced County's Restricted Materials License requirements and to minimize drift, as low wind and temperature conditions during pre-dawn hours provide optimal application conditions.

**Ongoing Management for the Protection of the Environment:**

The Project will undergo a three-year maintenance phase beginning in the year of planting unless permits require longer monitoring and maintenance. If the Project is completed in multiple phases, each phase will undergo a new maintenance period. During this time, River Partners will provide supplemental water for plant establishment, treat weeds as needed, and maintain the site's existing infrastructure necessary for the Project including lift pumps, irrigation pipes, access roads, and gates. After the first growing season, Project planting will be assessed for survivorship of woody plants and cover of herbaceous species. Permits for the project may require varying minimum survivorship and cover success criteria, and those requirements are not known at this time. Success criteria metrics pursuant to permits will be monitored and replanting or reseeding will be performed as necessary to maintain compliance with those permits. In River Partners' experience, replanting any losses after the first growing season is typically sufficient to achieve target survivorship and cover by the third year of plant establishment. Invasive plants and other site conditions that affect habitat establishment will also be monitored to inform maintenance actions.

After the maintenance period is complete on all Project phases, the property will be transferred to a long-term land steward, such as a state or federal agency or California Native American tribe. That entity will be responsible for ongoing management of the site in a manner compatible with the Project goals and the legal stipulations associated with Project funding sources, including the continued preservation of the site as habitat for the benefit of native fish and wildlife. Adaptive management by the future landowner, including continued invasive and native species management may occur over time but is not included within the scope of this restoration Project.



D. The Project does not include any construction activities, except for construction activities solely related to habitat restoration.

EMRCD has determined that the Project does not include any construction activities, except for those solely related to habitat restoration.

Please provide an explanation supporting the above determination. Please cite and attach any supporting documents.

The Project does not include construction activities. The topography of the site will be altered with standard grading equipment such as scrapers and small dozers to add low swales and high mounds on the site, which will create microhabitat diversity beneficial to wildlife. All other equipment on site used for disking, mowing, burning, planting, watering or other Project activities are only for the benefit of habitat restoration and maintenance. Any newly installed infrastructure including irrigation pipes and water control structures will be installed to support plant establishment during the maintenance period.

**5. CERTIFICATION**

*I certify that I have the authority to determine whether a project is exempt pursuant to CEQA Guidelines section 15025(a)(1), and this Project meets all the requirements described in Public Resources Code section 21080.56, and that I have submitted all the determinations required therein necessary to obtain the concurrence of the Director of Fish and Wildlife.*

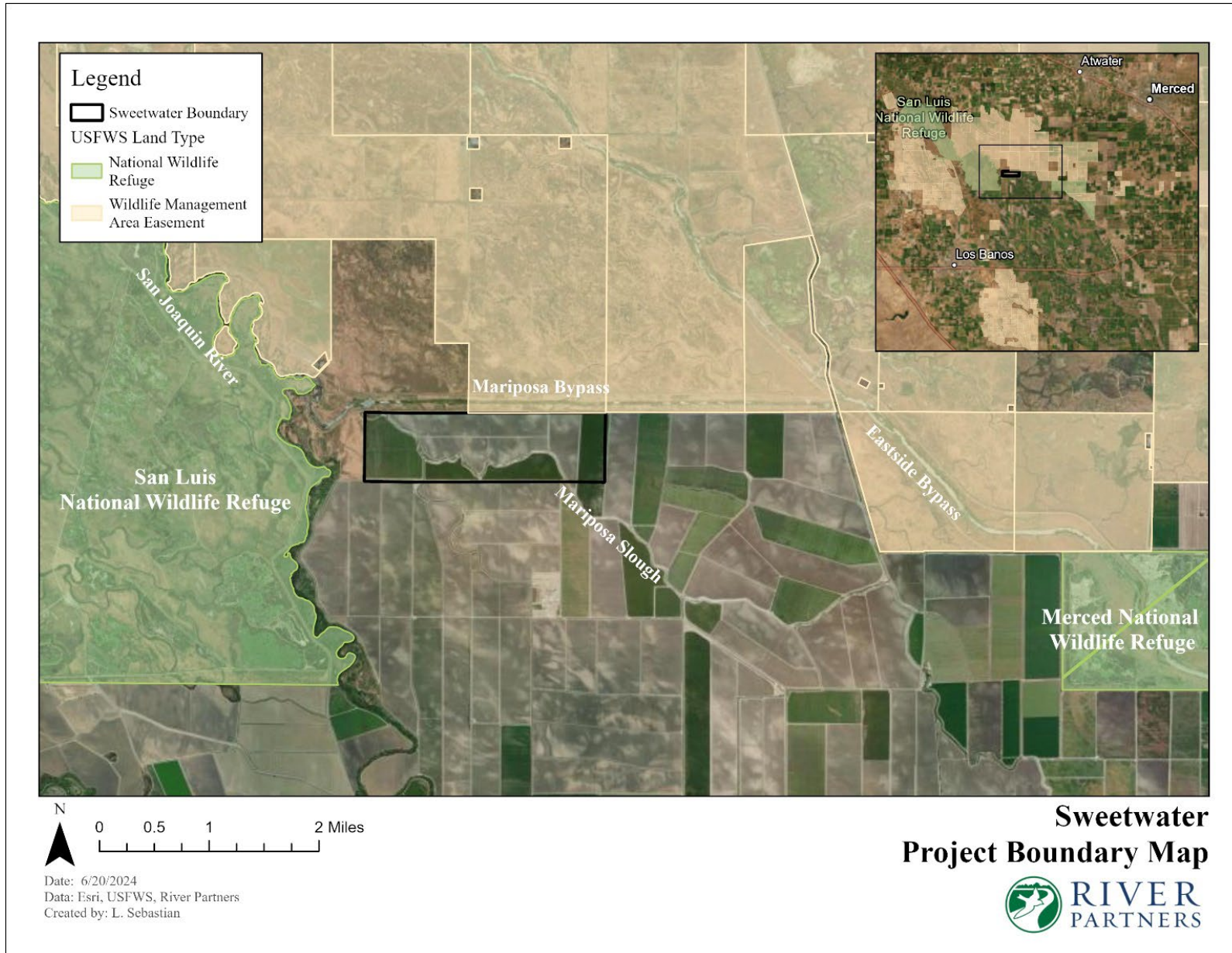
Date: 1/29/2026

\_\_\_\_\_  
Lead Agency Signature  
Zachary Wells – Executive Director  
East Merced Resource Conservation District



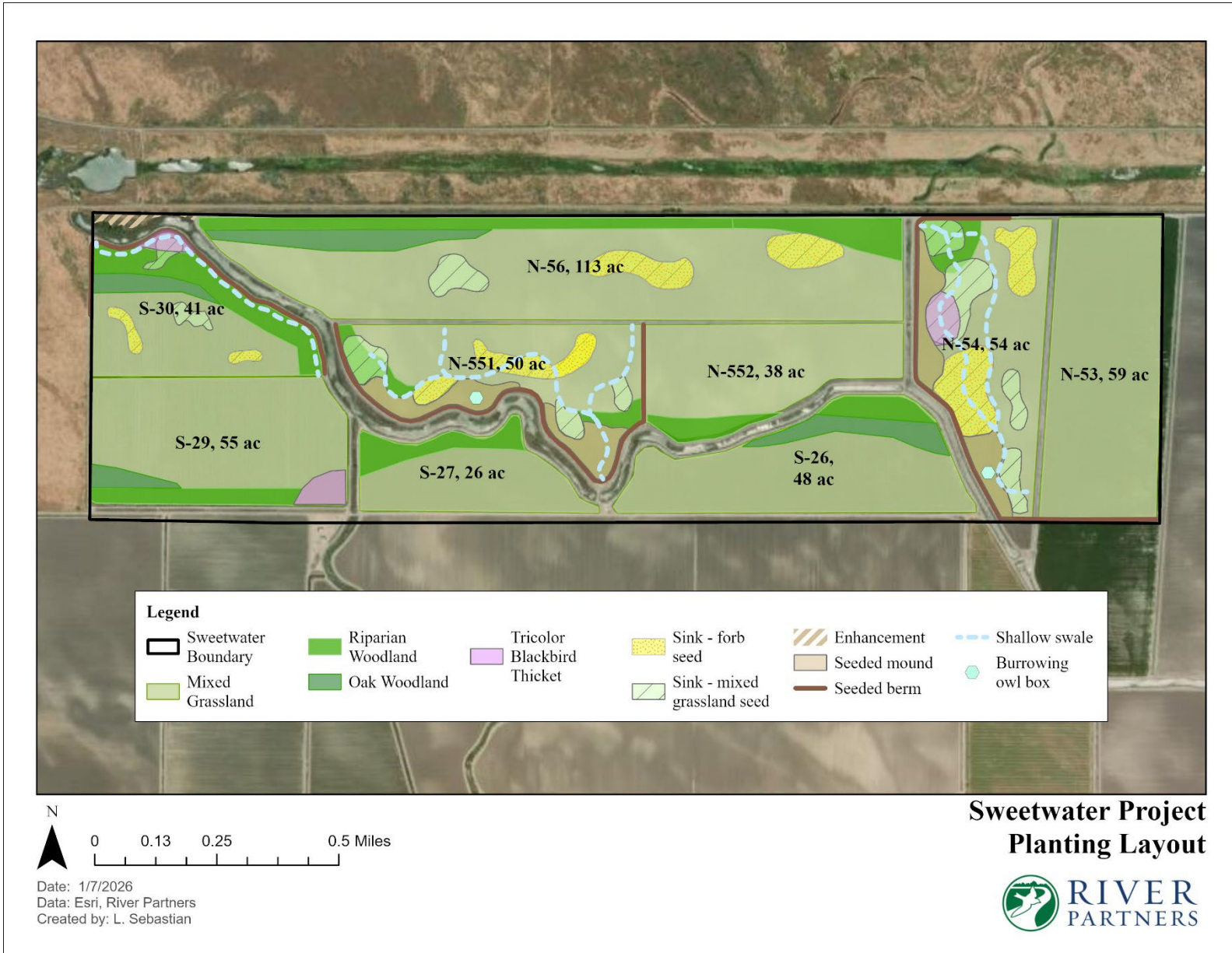
**Appendix**

**Appendix A. Project Boundary and Location Map**



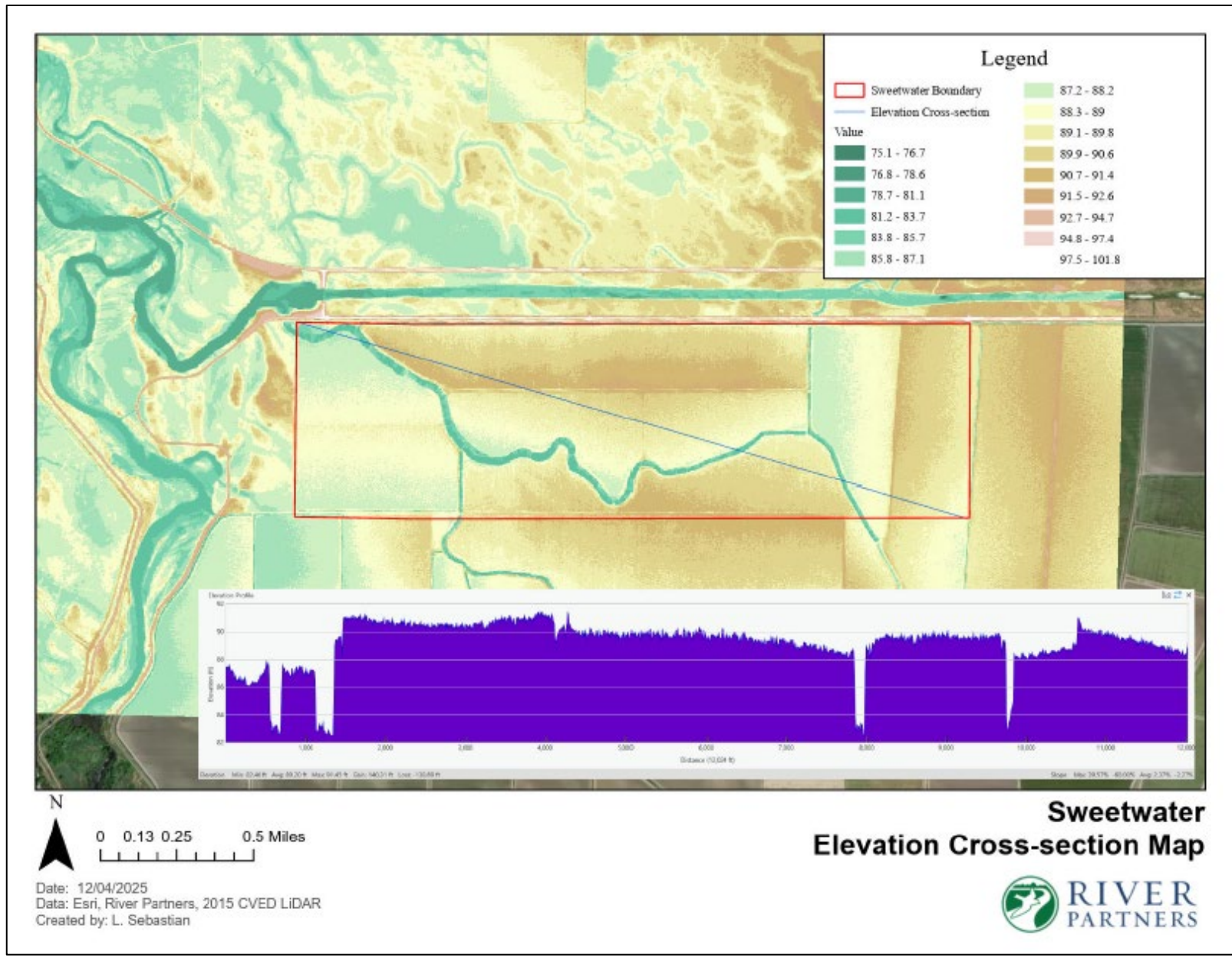


Appendix B. Restoration Layout Map



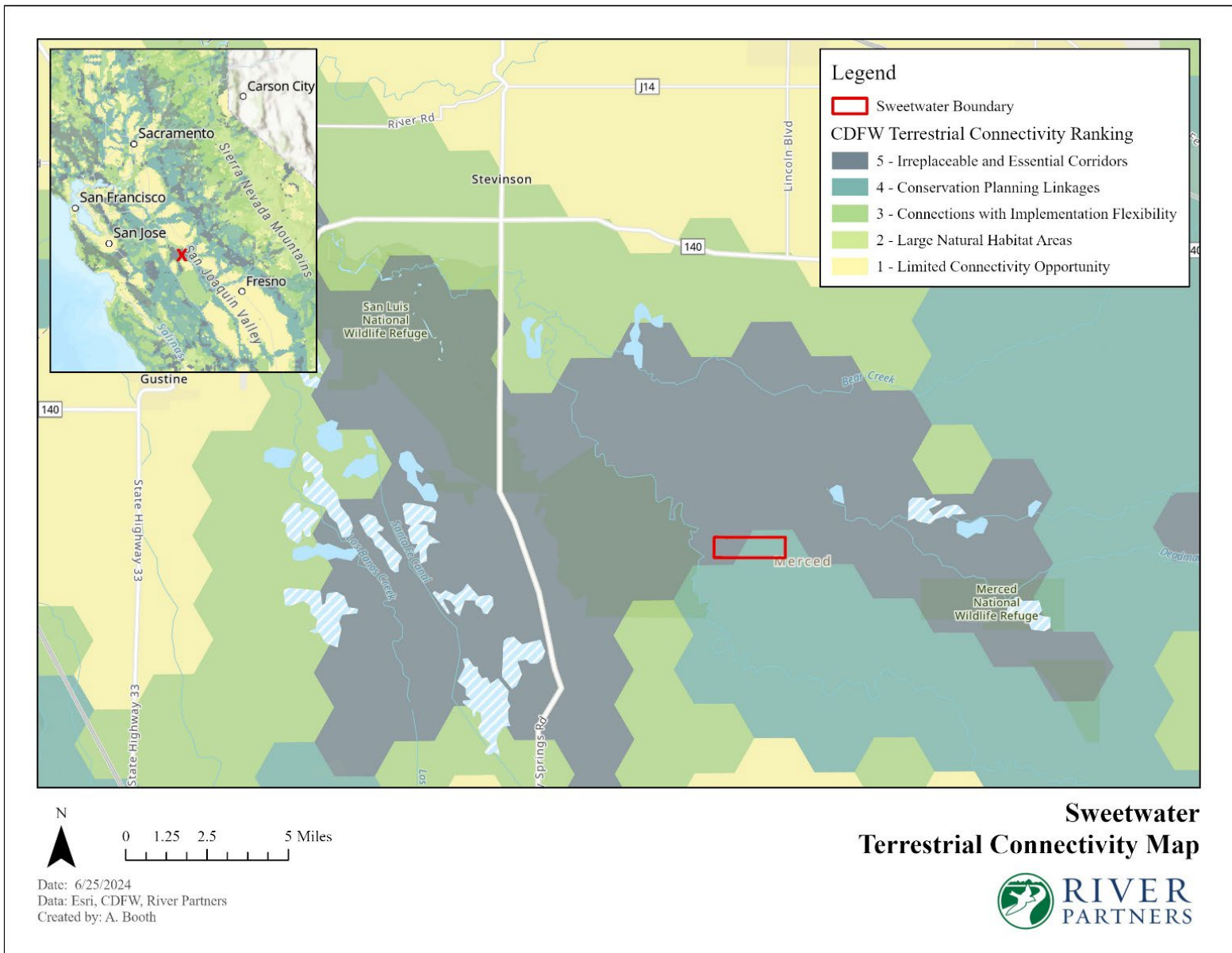


Appendix C. Elevation Cross-section Map





Appendix D. Terrestrial Connectivity Map





State of California – Department of Fish and Wildlife

**CEQA RESTORATION STATUTORY EXEMPTION REQUEST FORM**

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