



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Central Region
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Fresno, California 93710
(559) 243-4005
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August 4, 2026

Gabrielle Myers, Principal Planner
City of Hanford
317 North Douty Street
Hanford, California 93230
(559) 585-2578
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Subject: Harvest Creek Residential Development Project (Project)
Notice of Preparation (NOP)
State Clearinghouse No.: 2026070137

Dear Gabrielle Myers:

The California Department of Fish and Wildlife (CDFW) received an NOP of a Draft Environmental Impact Report (DEIR) from the City of Hanford (City) for the above-referenced Project 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 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 agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

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.

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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.), related authorization as provided by the Fish and Game Code may be required.

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 nests, and eggs 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 on any State or federal list pursuant to CESA and/or the federal Endangered Species Act to be considered endangered, rare, or threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: D.R. Horton

Objective: The proposed Project would include two components within an approximately 31-acre site: (1) pre-zoning to R-M (Medium Density Residential); and (2) construction of up to 229 single-family residential units and related infrastructure. The proposed Project would be constructed in three phases.

Location: The proposed Project site is located in unincorporated Kings County, northwest of the City of Hanford, at the southeast corner of Fargo Avenue and 13th Avenue. The Project site is comprised of portions of Assessor's Parcel Numbers 009-030-001 and -002.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project'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 Project.

The NOP notes that the Project site consists of row crops and a walnut orchard and is surrounded by agricultural land to the north and west and residential land to the south and east. Based on a review of the NOP, aerial imagery of the Project site and surrounding

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landscape, and species occurrence records from the California Natural Diversity Database (CNDDB) (CDFW 2026), the Project site is within the geographic range of several special-status 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 bumble bee (*Bombus crotchii*); and the State species of special concern and federally proposed for listing western spadefoot (*Spea hammondi*).

Swainson's Hawk

The Project site is within the known geographic range of Swainson's hawk (SWHA) and several occurrences are documented within 10 miles of the Project site (CDFW 2026). SWHA are known to breed within the Central Valley of California and prefer to nest and forage in alfalfa, fallow fields, field crops, and grassland habitats with a sufficient source of small mammals (CDFG 1994). Based on aerial imagery, most of the Project site contains suitable habitat for SWHA foraging. In addition, there are trees located adjacent to the Project site that may provide suitable nesting habitat. Therefore, CDFW recommends that a qualified biologist conduct surveys for nesting SWHA following the entire survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000) as part of the biological technical studies conducted in support of the DEIR.

In addition to conducting SWHA surveys, CDFW recommends including the following measures in the DEIR and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities:

Recommended Mitigation Measure 1: SWHA Pre-Construction Surveys

Depending on the time between the initial survey efforts conducted in support of the DEIR and Project construction, CDFW recommends that additional surveys, following the survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000), be repeated by a qualified biologist the survey season immediately prior to each Project phase.

Recommended Mitigation Measure 2: SWHA No-Disturbance Buffer

If any active SWHA nest is detected during pre-construction surveys or Project activities, CDFW recommends delineating and maintaining a minimum ½-mile no-disturbance buffer around each nest prior to and during any development or ground-disturbing activities. To prevent nest abandonment and other take of SWHA as a result of Project activities, CDFW advises that these no-disturbance buffers remain in place until the breeding season (March 1 through September 15) 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.

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Recommended Mitigation Measure 3: SWHA Take Authorization

If any active SWHA nest is detected during pre-construction surveys or Project activities, and a ½-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 Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Recommended Mitigation Measure 4: SWHA Foraging Habitat Mitigation

To reduce impacts on SWHA foraging habitat to a less-than-significant level, CDFW recommends mitigating habitat loss according to CDFW's 1994 Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (1994 Staff Report; CDFG 1994). The 1994 Staff Report recommends that mitigation for habitat loss occurs within a minimum distance of 10 miles from known nest sites. CDFW has the following recommendations based on the 1994 Staff Report:

- For projects within 1 mile of an active nest tree, a minimum of 1 acre of habitat management (HM) land for each acre of development is advised.
- For projects within 5 miles of an active nest but greater than 1 mile, a minimum of 0.75 acres of HM land for each acre of development is advised.
- For projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree, a minimum of 0.5 acres of HM land for each acre of development is advised.

Western Burrowing Owl

The Project site is within the known geographic range of western burrowing owl (BUOW), and there are several occurrences documented within 10 miles of the Project site (CDFW 2026). BUOW utilize agricultural areas and commonly nest along canals, irrigation ditches, and other infrastructure. Based on aerial imagery, potential BUOW burrowing and foraging habitat is present near or within the Project site. Therefore, CDFW recommends that a qualified biologist conduct focused surveys following the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) as part of the biological technical studies conducted in support of the DEIR.

In addition to conducting BUOW surveys, CDFW recommends including the following measures in the DEIR and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities:

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Recommended Mitigation Measure 5: BUOW Pre-construction Surveys

Depending on the time between the initial survey efforts conducted in support of the DEIR and Project construction, CDFW recommends that additional surveys, following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012), be repeated by a qualified biologist the survey season immediately prior to each Project phase. Please note that the 2012 Staff Report necessitates multiple surveys.

Recommended Mitigation Measure 6: BUOW No-Disturbance Buffer

If a BUOW or known BUOW den (active or inactive) is detected during pre-construction surveys or Project activities, CDFW recommends delineating and maintaining no-disturbance buffers, as outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012), prior to and during any development or ground-disturbing activities. CDFW advises that these no-disturbance 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 during pre-construction surveys or Project activities, and the no disturbance buffers outlined in the 2012 Staff Report on Burrowing Owl Mitigation (CDFG 2012) 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.

Crotch's Bumble Bee

The Project site is within the known geographical range of Crotch's bumble bee (CBB), and an occurrence is documented within 6 miles of the Project site (CDFW 2026). CBB are known to inhabit grassland and agricultural habitats that contain foraging resources such as flowering plants; nesting resources such as small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs; and/or overwintering resources such as leaf litter. These habitat features may be present near or within the Project site. Therefore, CDFW recommends a qualified biologist conduct a habitat assessment in accordance with the methodology outlined in the Survey Considerations for California Endangered Species Act Bumble Bee Species (CDFW 2023) to determine if portions of the Project site and surrounding landscape contain suitable habitat for CBB as part of the biological technical studies conducted in support of the DEIR. If potentially suitable habitat is identified, 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 Bumble Bee Species (CDFW 2023).

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In addition to conducting a habitat assessment and associated surveys, CDFW recommends including the following measures in the DEIR and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities:

Recommended Mitigation Measure 8: CBB Habitat Assessment

Depending on the time between the initial habitat assessment conducted in support of the DEIR and Project construction, CDFW recommends that an additional habitat assessment, following the Survey Considerations for California Endangered Species Act Bumble Bee Species (CDFW 2023), be repeated by a qualified biologist the survey season immediately prior to each Project phase.

Recommended Mitigation Measure 9: CBB Pre-Construction Surveys

If potentially suitable habitat is identified, 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) immediately prior to any development or ground-disturbing activities.

Recommended Mitigation Measure 10: CBB Avoidance and Take Authorization

If CBB is detected, CDFW recommends that all small mammal burrows, thatched/bunch grasses, and any other potential nesting resources be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities would 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. 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 Spadefoot

The Project site is within the known geographic range of western spadefoot (WESP), and an occurrence is documented within 6 miles of the Project site (CDFW 2026). WESP are known to occur within grasslands and seasonal wetlands with appropriate upland habitat, and are also known to utilize agricultural lands, including those in active cultivation. Within agricultural settings, WESP are known to breed within and adjacent to agricultural sumps and irrigation ditches, as well as in low-lying areas that are inundated for a sufficient duration during the breeding season. These habitat features may be present near or within the Project site. Therefore, CDFW recommends a qualified biologist conduct a habitat assessment to determine if portions of the Project site and surrounding landscape contain suitable habitat for WESP as part of the biological technical studies conducted in support of

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the DEIR. If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for WESP using appropriate survey methodologies.

In addition to conducting a habitat assessment and associated surveys, CDFW recommends including the following measures in the DEIR and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities:

Recommended Mitigation Measure 11: WESP Habitat Assessment

Depending on the time between the initial habitat assessment conducted in support of the DEIR and Project construction, CDFW recommends that an additional habitat assessment be repeated the survey season immediately prior to each Project phase.

Recommended Mitigation Measure 12: WESP Pre-Construction Surveys

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for WESP, using appropriate survey methodologies, prior to any development or ground-disturbing activities.

Recommended Mitigation Measure 13: WESP No-Disturbance Buffer

If burrows, cracks, loose soil, soft soil areas immediately adjacent to water features, or other refugia are found to be used by WESP during focused surveys, avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around the outermost edge of these habitats. If the species is observed on the Project site, Project activities in the immediate vicinity should cease, allowing individuals to leave the Project site on their own accord.

Please be advised that on September 24, 2025, the California Fish and Game Commission (FGC) received a petition to list the northern population of WESP as a threatened species and the southern population of WESP as an endangered species under CESA. At the FGC meeting on April 16, 2026, CDFW presented its determination that the petition provided sufficient scientific information that the petitioned action to list WESP under CESA may be warranted; however, the FGC deferred its decision on WESP candidacy until August 2026. If WESP becomes a candidate for listing or ultimately becomes listed as threatened or endangered pursuant to CESA, 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 if full avoidance of WESP cannot be achieved. Please note that implementation of the recommended measures above would help to mitigate for potentially significant impacts to WESP as required by CEQA but may not fully avoid impacts and thus take. Additional measures, including a larger no-disturbance buffer, may be needed to avoid take of WESP. If WESP becomes protected under CESA, CDFW recommends early consultation to help identify if avoidance is feasible or, if not, to initiate discussions regarding the need for ITP acquisition.

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Editorial Comments and/or Suggestions

Nesting Birds: CDFW encourages that any proposed vegetation- or ground-disturbing activities occur during the bird non-nesting season; however, if vegetation- or ground-disturbing activities must occur during the nesting season (February 1 through September 15), the Project proponent 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 above.

CDFW further recommends that a qualified biologist conduct pre-Project surveys for active nests no more than 10 days prior to the start of vegetation- or ground-disturbing activities to maximize the probability of detecting nests that could potentially be impacted. 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 a project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of vegetation- or ground-disturbing activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests.

Once vegetation- or ground-disturbing activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the activities associated with 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 implementing a minimum 250-foot no-disturbance buffer around active nests of non-listed bird species and a minimum 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. Prior to implementing a variance from these no-disturbance buffers, CDFW recommends that a qualified biologist assess the site-specific circumstances, provide a biological or ecological justification to support a variance, if possible, and notify CDFW.

Lake and Streambed Alteration: Based on aerial imagery, there are several agricultural ditches located in the Project vicinity. Additionally, the NOP notes that the proposed Project could impact an agricultural ditch located west of the Project site. Please note that Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant to Fish and Game Code section 1600 et seq.

Specifically, 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

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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 and may include those that are highly modified such as canals, ditches, and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration (LSA) 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 LSA 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.

Water Pollution: Pursuant to Fish and Game Code section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into "Waters of the State" any substance or material deleterious to fish, plant life, or bird life, including non-native species. It is possible that without mitigation measures the Project could result in pollution of a "Waters of the State" from increased sediment, salts, nitrates, and pathogens in stormwater runoff; discharge of other constituents of concern such as endocrine disruptors; or construction-related erosion which could impact fish and wildlife resources. The Regional Water Quality Control Board and U.S. Army Corps of Engineers also have jurisdiction regarding discharge and pollution to "Waters of the State".

Cumulative Impacts: CDFW recommends conducting a cumulative impact analysis for all biological resources that would either be significantly or potentially significantly impacted by implementation of the Project, including biological resources with impacts determined to be less than significant with mitigation incorporated and biological resources that are rare, or in poor or declining health, that would be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). CDFW recommends analyzing cumulative impacts using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on biological resources and that this analysis focuses specifically on the biological resources, not the projects. An appropriate biological resource study area should be identified and mapped for each biological resource analyzed and used for this analysis. CDFW staff are available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and cumulative impact analysis conducted in support of the Project's DEIR be used to develop and modify the Project'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.

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California Natural Diversity Database (CNDDDB): Please note that the CNDDDB is populated by voluntary submission records 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 a species is not present. 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 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, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the 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 completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. 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 NOP to assist the City 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>).

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Please see the enclosed, Attachment 1, Mitigation Monitoring and Reporting Program (MMRP) table, which corresponds with recommended mitigation measures in this comment letter. If you have any questions regarding this letter or further coordination, please contact Stephanie Manzo, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 578-0409, or by electronic mail at Stephanie.Manzo@wildlife.ca.gov.

Sincerely,

DocuSigned by:

E9964E60293D40A...

For Julie A. Vance
Regional Manager

Attachment 1: Mitigation Monitoring and Reporting Program

ec: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

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REFERENCES

- California Department of Fish and Game. 1994. Staff report regarding mitigation for impacts to Swainson's hawks (*Buteo Swainsoni*) in the Central Valley of California. California Department of Fish and Game, Sacramento, California, USA.
- California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. California Department of Fish and Game, Sacramento, California, USA.
- California Department of Fish and Wildlife. 2023. Survey considerations for California Endangered Species Act candidate bumble bee species. California Department of Fish and Wildlife, Sacramento, California, USA.
- California Department of Fish and Wildlife. 2026. Biogeographic information and observation system (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>. Accessed 29 July 2026.
- 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.

Attachment 1

Attachment 1

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

PROJECT: Harvest Creek Residential Development Project

SCH No.: 2026070137

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Swainson's hawk (SWHA)	
Recommended Mitigation Measure 1: SWHA Pre-Construction Surveys	
Recommended Mitigation Measure 3: SWHA Take Authorization	
Recommended Mitigation Measure 4: SWHA Foraging Habitat Mitigation	
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 Assessment	
Recommended Mitigation Measure 9: CBB Pre-Construction Surveys	
Recommended Mitigation Measure 10: CBB Avoidance and Take Authorization	
Western spadefoot (WESP)	
Recommended Mitigation Measure 11: WESP Habitat Assessment	
Recommended Mitigation Measure 12: WESP Pre-Construction Surveys	
<i>During Construction</i>	
Swainson's hawk (SWHA)	

Recommended Mitigation Measure 2: SWHA No-Disturbance Buffer	
Western burrowing owl (BUOW)	
Recommended Mitigation Measure 6: BUOW No-Disturbance Buffer	
Crotch's bumble bee (CBB)	
Recommended Mitigation Measure 10: CBB Avoidance and Take Authorization	
Western spadefoot (WESP)	
Recommended Mitigation Measure 13: WESP No-Disturbance Buffer	