



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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August 24, 2026

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**Subject: Bonadelle Lacey Ave Residential Project (Project)
Initial Study (IS) and Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2026071023**

Dear Gabrielle Myers:

The California Department of Fish and Wildlife (CDFW) received an IS/MND 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. For example, 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).

PROJECT DESCRIPTION SUMMARY

Proponent: Bonadelle Neighborhoods

Objective: The proposed Project would include the annexation of a 16.65-acre site and construction of a residential development on a 13.88-acre portion of the site, consisting of 78 single-family residential lots, access roads, lighting, landscaping, and other associated improvements. The Project would be developed in one phase.

Location: The proposed Project would be located immediately west of the City of Hanford within Assessor’s Parcel Numbers 011-010-003, -004, -005, -006, -007, -008, and -009.

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 IS/MND prepared for this Project.

The IS/MND notes that the Project site consists of fallowed agricultural land and a rural residence and that the Project site vicinity consists of a mix of urban and agricultural uses. The IS/MND acknowledges that special-status species have the potential to occur on or adjacent to the Project site and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some of these measures to reduce impacts to less than significant and avoid unauthorized take of the State threatened Swainson’s hawk (*Buteo swainsoni*), and the State candidate western burrowing owl (*Athene cunicularia hypugaea*), western spadefoot (*Spea hammondi*),

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and Crotch's bumble bee (*Bombus crotchii*). As such, CDFW recommends incorporating the following measures into the IS/MND prior to its adoption by the City.

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). The IS/MND indicates that SWHA has no potential to occur in the Project vicinity and states, "While the Project site contains limited foraging habitat for the species, large trees in the survey area are associated with residential development." Please note that based on species occurrence records from the California Natural Diversity Database (CNDDB) (CDFW 2026), SWHA nests have been documented adjacent to rural residences in agricultural areas similar to the Project site. Therefore, SWHA may potentially nest in or near the Project site. As such, CDFW recommends including the following measures in the IS/MND prior to its adoption by the City, 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

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) the survey season immediately prior to the start of Project development or ground-disturbing activities.

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.

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

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Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Western Burrowing Owl

The Project site is within the known geographic range of western burrowing owl (BUOW), and an occurrence is 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. Mitigation measure BIO-1 of the IS/MND requires a qualified biologist to conduct a pre-construction survey in accordance with the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012) in and within 500 feet of the impact areas prior to the initiation of construction activities. While CDFW concurs with conducting a pre-construction survey in accordance with the 2012 Staff Report, we recommend surveying out to 500 meters to facilitate avoidance of BUOW and BUOW dens as outlined in the 2012 Staff Report. As such, CDFW recommends modifying mitigation measure BIO-1 of the IS/MND to incorporate the following recommended mitigation measures prior to its adoption by the City, and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities.

Recommended Mitigation Measure 4: BUOW Pre-Construction Surveys

CDFW recommends that focused surveys, following the 2012 Staff Report on Burrowing Owl Mitigation (2012 Staff Report; CDFG 2012), be conducted in and within 500 meters of the Project site, the survey season immediately prior to construction. Please note that the 2012 Staff Report necessitates multiple surveys prior to the initiation of construction.

Recommended Mitigation Measure 5: 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 6: 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

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

Western Spadefoot

The Project site is within the known geographic range of western spadefoot (WESP) (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.

The IS/MND indicates that WESP has no potential to occur in the Project vicinity and that habitat is lacking due to routine disking and lack of suitable pools for breeding. CDFW does not concur with this conclusion. Based on aerial imagery, potential breeding habitat may be present near and within the Project site. CDFW recommends that habitat assessments for WESP be conducted during the rainy season when pooled/ponded water is visible to evaluate potentially occupied breeding habitat. As it does not appear that WESP habitat assessments were conducted during the appropriate hydroperiod, CDFW recommends conducting a more robust habitat assessment for WESP during the rainy season prior to any Project development or ground-disturbing activities. If potentially suitable habitat is identified, consultation with CDFW is recommended for guidance on appropriate WESP surveys, and for guidance on appropriate avoidance, minimization, and mitigation measures. If take cannot be avoided, take authorization through the acquisition of an ITP is necessary to comply with CESA, pursuant to Fish and Game Code section 2081 subdivision (b).

Additionally, the IS/MND states that WESP is listed as a State species of special concern. Please be advised that the California Fish and Game Commission (FGC) approved WESP as a candidate for potential listing as a protected species under CESA on August 13, 2026, and is in the process of publishing the Notice of Findings in the California Regulatory Notice Register. Once the Notice of Findings is published, WESP will be designated as a candidate under CESA and as such will receive the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

Crotch's Bumble Bee

The Project site is within the known geographic 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

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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 including the following measures in the IS/MND prior to its adoption by the City, and that these measures be incorporated prior to the initiation of any Project development or ground-disturbing activities.

Recommended Mitigation Measure 7: CBB Habitat Assessment

CDFW recommends that a qualified biologist conduct a habitat assessment following the Survey Considerations for California Endangered Species Act Bumble Bee Species (CDFW 2023), the survey season immediately prior to the start of Project development or ground-disturbing activities.

Recommended Mitigation Measure 8: 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 9: 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.

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.

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Mitigation measure BIO-2 of the IS/MND states, "To the extent practicable, construction shall be scheduled to avoid the nesting season, which extends from February through August. If it is not possible to schedule construction between September and January, pre-construction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no active nests will be disturbed during the implementation of the Project. A pre-construction survey shall be conducted no more than 10 days prior to the initiation of construction activities. During this survey, the qualified biologist shall inspect all potential nest substrates in and immediately adjacent to the impact areas." In addition to identifying nests, CDFW recommends that qualified biologists establish a behavioral baseline of all identified nests during the pre-construction survey.

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.

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. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified 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.

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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 IS/MND 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>).

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:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

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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 14 August 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: Bonadelle Lacey Ave Residential Project

SCH No.: 2026071023

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 2: SWHA No-Disturbance Buffer	
Recommended Mitigation Measure 3: SWHA Take Authorization	
Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 4: BUOW Pre-Construction Surveys	
Recommended Mitigation Measure 5: BUOW No-Disturbance Buffer	
Recommended Mitigation Measure 6: BUOW Take Authorization	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 7: CBB Habitat Assessment	
Recommended Mitigation Measure 8: CBB Pre-Construction Surveys	
Recommended Mitigation Measure 9: CBB Avoidance and Take Authorization	
<i>During Construction</i>	
Swainson's Hawk (SWHA)	
Recommended Mitigation Measure 2: SWHA No-Disturbance Buffer	
Recommended Mitigation Measure 3: SWHA Take Authorization	

Western Burrowing Owl (BUOW)	
Recommended Mitigation Measure 5: BUOW No-Disturbance Buffer	
Recommended Mitigation Measure 6: BUOW Take Authorization	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 9: CBB Avoidance and Take Authorization	