State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

July 27, 2020

Young Choi
County of San Luis Obispo
976 Osos Street Room 300
San Luis Obispo, California 93408

Subject: Cayucos Ranch Minor Use Permit/Coastal Development Permit ED20-120 (Project)
Initial Study/Mitigated Negative Declaration
SCH#: 2020060589

Dear Ms. Choi:

The California Department of Fish and Wildlife (CDFW) received an Initial Study (IS) and Mitigated Negative Declaration (MND) from the County of San Luis Obispo Department of Planning and Building 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 Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statue 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

[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.

expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, 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.

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 implementation of the Project could result in pollution of Waters of the State from storm water runoff or construction-related erosion. Potential impacts to the wildlife resources that utilize these watercourses include the following: increased sediment input from road or structure runoff; toxic runoff associated with development activities and implementation; and/or impairment of wildlife movement along riparian corridors. 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.

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

PROJECT DESCRIPTION SUMMARY

Proponent: William Tucker

Objective: A request by Davis Family for a Minor Use Permit/Coastal Development Permit (DRC2019-00178) to construct an 1,800-linear-foot long agricultural road and 74-foot free-span bridge across Little Cayucos Creek to replace the existing site access. The project would result in the disturbance of 1.5 acres on a 428-acre (comprised of three contiguous parcels). The project is within Agriculture land use category and is located at 1101 Little Cayucos Creek Road, northeast of community of Cayucos. The project is in the Estero Planning Area.

Location: The project is in the Estero Planning Area and is located north of Cayucos Dr north of Highway 1 in the town of Cayucos.

Timeframe: N/A

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist County of San Luis Obispo 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 document.

Currently, the IS/MND indicates that the Project's impacts would be less than significant with the implementation of mitigation measures described in the MND. However, as currently drafted, it is unclear whether the mitigation measures described will be enforceable or sufficient in reducing impacts to a level that is less than significant. In particular, CDFW is concerned regarding adequacy of mitigation measures for special-status species including, but not limited to, the State endangered Southwest/South Coast Clade of foothill yellow-legged frog (*Rana boylii*), the State species of special concern and federally threatened California red-legged frog (*Rana draytonii*), and the State species of special concern American badger (*Taxidea taxus*), western pond turtle (*Emys marmorata*), and burrowing owl (*Athene cunicularia*). In order to adequately assess any potential impact to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, especially in the areas not in irrigated agriculture, and to identify any Project-related impacts under CESA and other species of concern.

I. Environmental Setting and Related Impact

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service (USFWS)?

COMMENT 1: Foothill Yellow-Legged Frog (FYLF) and California Red-Legged Frog (CRLF)

Issue: FYLF are primarily stream dwelling and requires shallow, flowing water in streams and rivers with at least some cobble-sized substrate; CRLF primarily inhabit

ponds but can also be found in other waterways including marshes, pools and backwaters within streams and creeks, and lagoons, and the species will also breed in ephemeral waters (Thomson et al. 2016). The Project site contains habitat that may support both species. Avoidance and minimization measures are necessary to reduce impacts to FYLF and CRLF to a level that is less than significant.

Specific impact: Without appropriate avoidance and minimization measures for FYLF and CRLF, potentially significant impacts associated with the Project's activities include alteration to the natural flow regime of the adjacent streams, indirect negative effects by altering habitat availability and quality, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, and direct mortality of individuals.

Evidence impact would be significant: FYLF and CRLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated; historically, FYLF occurred in mountain streams from the San Gabriel River in Los Angeles County to southern Oregon west of the Sierra-Cascade crest (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs are the primary threats to FYLF and CRLF (Thomson et al. 2016, USFWS 2017). Project activities have the potential to significantly impact both species.

Recommended Potentially Feasible Mitigation Measure(s)
Because the IS/MND identifies the potential for CRLF to occur in the Project area, but not FYLF, CDFW recommends editing the MND to include the following measures, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 1: FYLF and CRLF Surveys

CDFW recommends that a qualified wildlife biologist conduct surveys for FYLF and CRLF in accordance with the USFWS "Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog" (USFWS 2005) to determine if FYLF and CRLF are within or adjacent to the Project area; while this survey is designed for CRLF, the survey may be used for FYLF focusing on stream/river habitat.

Recommended Mitigation Measure 2: FYLF and CRLF Avoidance

If any FYLF or/and CRLF are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when FYLF and CRLF are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must

take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for FYLF and CRLF.

Recommended Mitigation Measure 3: FYLF Take Authorization

The Southwest/South Coast Clade of FYLF is State endangered. If through surveys it is determined that FYLF are occupying or have the potential to occupy the Project site and take cannot be avoided, take authorization would be warranted prior to initiating ground-disturbing activities to comply with CESA. Take authorization would occur through issuance of an Incidental Take Permit (ITP) by CDFW, pursuant to Fish and Game Code section 2081 subdivision (b). In the absence of surveys, the applicant can assume presence of FYLF within the Project site and obtain an ITP from CDFW.

COMMENT 2: American Badger

Issue: American badger have the potential to occur in and near the Project site (CDFW 2020). Badgers occupy sparsely vegetated land cover with dry, friable soils to excavate dens, which they use for cover, and that support fossorial rodent prey populations (i.e. ground squirrels, pocket gophers, etc.) (Zeiner et al. 1990). The Project site may support these requisite habitat features. Therefore, the Project has the potential to impact American badger. Eviction of badgers by excavating the dens using hands tools or mechanized equipments as proposed in Mitigation Measure BIO-3 could be a potentially significant impact under CEQA.

Specific impact: Without appropriate avoidance and minimization measures for American badger, potentially significant impacts associated with ground disturbance include direct mortality or natal den abandonment, which may result in reduced health or vigor of young.

Evidence impact is potentially significant: Habitat loss is a primary threat to American badger (Gittleman et al. 2001). The Project has the expectation disturb annual grassland habitat. As a result, ground-disturbing activities have the potential to significantly impact local populations of American badger.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends editing Mitigation Measure BIO-3 of the MND to include the following measures, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 4: American Badger Surveys

If suitable habitat is present, CDFW recommends that a qualified biologist conduct

focused surveys for American badger and their requisite habitat features (dens) to evaluate potential impacts resulting from ground- and vegetation-disturbance.

Recommended Mitigation Measure 5: American Badger Avoidance

Avoidance whenever possible is encouraged via delineation and observation of a 50-foot no-disturbance buffer around occupied dens and a 250-foot no-disturbance buffer around natal dens until it is determined through non-invasive means that individuals occupying the den have dispersed.

COMMENT 3: Western pond turtle (WPT)

Issue: WPT are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported (Thomson et al. 2016). The Project site includes a segment of Little Cayucos Creek which has the potential to support aquatic species.

Specific impact: Without appropriate avoidance and minimization measures for WPT, potentially significant impacts associated with Project activities could include nest reduction, inadvertent entrapment, reduced reproductive success, reduction in health or vigor of eggs and/or young, and direct mortality.

Evidence impact is potentially significant: The Project site is in potential WPT habitat. Additionally, noise, vegetation removal, movement of workers, and ground disturbance as a result of Project activities have the potential to significantly impact WPT populations.

Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to WPT, CDFW recommends conducting the following evaluation of the Project site, editing the MND to include the following measures specific to WPT, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 6: WPT Surveys

CDFW recommends that a qualified biologist conduct focused surveys for WPT ten days prior to Project implementation. In addition, CDFW recommends that focused surveys for nests occur during the egg-laying season (March through August) and that any nests discovered remain undisturbed until the eggs have hatched.

Recommended Mitigation Measure 7: WPT Relocation

CDFW recommends that if any WPT are discovered at the site immediately prior to or during Project activities, they be allowed to move out of the area on their own accord.

COMMENT 4: Burrowing Owl (BUOW)

Issue: BUOW may occur on the Project site. BUOW inhabit open grassland or adjacent canal banks, ROWs, vacant lots, etc. containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. Review of aerial imagery indicates that these features are likely present within the Project site.

Specific impact: Potentially significant direct impacts associated with subsequent activities include burrow collapse, inadvertent entrapment, nest abandonment, reduced reproductive success, reduction in health and vigor of eggs and/or young, and direct mortality of individuals.

Evidence impact is potentially significant: BUOW rely on burrow habitat year-round for their survival and reproduction. Habitat loss and degradation are considered the greatest threats to BUOW (Gervais et al. 2008). Ground-disturbing activities associated with the Project have the potential to significantly impact local BUOW populations. In addition, and as described in CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), excluding and/or evicting BUOW from their burrows is considered a potentially significant impact under CEQA.

Recommended Potentially Feasible Mitigation Measure(s)

CDFW recommends conducting the following evaluation of the Project site, editing the MND to include the following measures, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 8: BUOW Surveys

CDFW recommends that a qualified biologist assess if suitable BUOW habitat features are present within or adjacent to the Project site (e.g., burrows). If suitable habitat features are present, CDFW recommends assessing presence/absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium's "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's Staff Report on Burrowing Owl Mitigation" (CDFG 2012). Specifically, CBOC and CDFW's Staff Report suggest three or more surveillance surveys conducted during daylight with each visit occurring at least three weeks apart during the peak breeding season (April 15 to July 15), when BUOW are most detectable.

Recommended Mitigation Measure 9: BUOW Avoidance

CDFW recommends no-disturbance buffers, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG 2012), be implemented prior to and during any ground-disturbing activities. Specifically, CDFW's Staff Report recommends that impacts to occupied burrows be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through non-invasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Recommended Mitigation Measure 10: BUOW Passive Relocation and Mitigation

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to the Staff Report (CDFG 2012), exclusion is not a take avoidance, minimization, or mitigation method and is considered a potentially significant impact under CEQA. However, if necessary, CDFW recommends that burrow exclusion be conducted by qualified biologists and only during the non-breeding season, before breeding behavior is exhibited and after the burrow is confirmed empty through non-invasive methods, such as surveillance. CDFW recommends replacement of occupied burrows with artificial burrows at a ratio of 1 burrow collapsed to 1 artificial burrow constructed (1:1) as mitigation for the potentially significant impact of evicting BUOW. BUOW may attempt to colonize or re-colonize an area that will be impacted; thus, CDFW recommends ongoing surveillance, at a rate that is sufficient to detect BUOW if they return.

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

COMMENT 5: Lake and Streambed Alteration

Issue: The IS/MND acknowledges the presence of riparian habitat at Project sites and the Project description includes activities within the bed and bank of Little

Cayucos Creek. While the IS/MND includes Mitigation Measure BIO-9 which states that prior to construction permit issuance, all applicable agency permits with jurisdiction over the project area should be obtained, as necessary, this measure does not specifically require Notification to CDFW or that Project activities are subject to CDFW's regulatory authority. In addition, it is unclear from the Project Description if any diversion of water around work areas at the Project site will occur and does not provide any guidance or impose any requirements for conducting water diversions.

Specific impact: Work within stream channels has the potential to result in substantial diversion or obstruction of natural flows; substantial change or use of material from the bed, bank, or channel (including removal of riparian vegetation); deposition of debris, waste, sediment, toxic runoff or other materials into water causing water pollution and degradation of water quality.

Evidence impact is potentially significant:

Lake and Streambed Alteration

The Project includes activities within the bed and bank of Little Cayucos Creek. Activities within this creek are subject to CDFW's lake and streambed alteration regulatory authority. Construction activities have the potential to impact downstream waters. Streams function in the collection of water from rainfall, storage of various amounts of water and sediment, discharge of water as runoff and the transport of sediment, and they provide diverse sites and pathways in which chemical reactions take place and provide habitat for fish and wildlife species. Disruption of stream systems such as these can have significant physical, biological, and chemical impacts that can extend into the adjacent uplands adversely effecting not only the fish and wildlife species dependent on the stream itself, but also the flora and fauna dependent on the adjacent upland habitat for feeding, reproduction, and shelter. As stated above, Little Cayucos Creek may potentially support sensitive species listed as threatened or endangered under the Federal Endangered Species Act (FESA), as well as several State special-status species including, California red-legged frog, foothill yellow-legged frog, and Western pond turtle.

Water Diversion

During the construction of the freespan bridge across Little Cayucos Creek, the IS/MND seems to indicate some portion of the stream may need to be dewatered. Water diversions can impact flow regimes. Prolonged low flows can cause streams to become degraded and cause channels to become disconnected from floodplains (Poff et al. 1997). This process decreases available habitat for aquatic species including fish that utilize floodplains for nursery grounds. Prolonged low flows can also increase mortality for species that rely on specific flow regimes, such as endangered salmonids (Moyle 2002). Amphibians can also be sensitive to

decreased flows. Kupferberg et al. (2012) reported that low flows were strongly correlated with early life stage mortality and decreased adult densities of California red-legged frogs, a species of special concern in California, and one with potential to occur in the Project area.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting)
CDFW recommends editing Mitigation Measure BIO-9 to include the following measures as conditions of Project approval and conducting the following evaluation of the Project area prior to implementation of Project activities.

Mitigation Measure 11: Notification of Lake or Streambed Alteration

Project-related activities that have the potential to change the bed, bank, and channel of streams and other waterways or alter riparian habitat, are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq., therefore Notification is recommended. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial. CDFW is required to comply with CEQA in the issuance of a Lake and Streambed Alteration Agreement. For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593.

Mitigation Measure 12: Water Diversion

In the event that stream diversion is necessary, CDFW advises that diversions (1) be conducted in a manner that prevents pollution and/or siltation; (2) provides flows to downstream reaches during all times that the natural flow would support aquatic life; (3) that said flows are of sufficient quality and quantity, and of appropriate temperature to support aquatic life, both above and below the diversion, and (4) that normal flows be restored to the affected stream immediately upon completion of work. With regard to cofferdams, CDFW recommends that they not be made of silt, sand and gravel, or other substances subject to erosion unless first enclosed by protective material and that the enclosure and supportive material be removed as soon as the work is completed. With regard to dewatering, CDFW recommends (1) that turbid water pumped from the Project site be discharged to a location outside the wetted channel to allow sediment to drop out, (2) water be allowed to return to the stream below the Project site to maintain water flow, (3) temporary diversion

structures used to isolate the Project site be constructed in a manner that prevents seepage into the Project site, and (4) the structure, including all fill, enclosure material, and trapped sediments, be removed when the Project is completed.

If it is necessary to dewater the Project site, either by pump or gravity flow, CDFW recommends that the suction end of the intake pipe be fitted with fish screens meeting CDFW and National Marine Fisheries Service (NMFS) criteria, as outlined in the NMFS (1997) "*Fish Screening Criteria for Anadramous Salmonids*," to prevent entrainment or impingement of small fish and other wildlife. CDFW recommends development of a wildlife removal and rescue plan and that this plan be submitted to CDFW for approval prior to the start of Project activities. CDFW recommends that the plan be implemented by a qualified biologist who holds a Scientific Collecting Permit for the species. As part of the wildlife removal and rescue plan, CDFW recommends that a record be maintained of all wildlife rescued and moved. CDFW further advises that the record include information on the date of capture and relocation, the method of capture, location of relocation in relation to the Project site, and the number and type of wildlife captured and relocated.

Please note that implementation of the above recommendations does not eliminate the need to obtain the appropriate permits prior to the start of stream diversion or dewatering activities.

II. Editorial Comments and/or Suggestions

Federally Listed Species: CDFW recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to, CRLF. Take under FESA is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground-disturbing activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data. The completed form can be mailed electronically to CNDDB at the following email address:

CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be 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 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).

CDFW appreciates the opportunity to comment on the Project to assist the County of San Luis Obispo in identifying and mitigating the Project's 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). If you have any questions, please contact Jaime Marquez, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 243-4014, extension 291, or by electronic mail at Jaime.Marquez@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Bob Stafford
5343A684FF02469...

Bob Stafford for Julie A. Vance
Regional Manager

Attachment 1

cc: United States Fish and Wildlife Service
2493 Portola Road, Suite B
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United States Army Corps of Engineers
San Francisco District, South Branch
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ec: Linda Connolly; CDFW

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Attachment 1

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

PROJECT: Cayucos Ranch Minor Use Permit/Coastal Development Permit ED20-120
SCH No.: 2020060589

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Mitigation Measure 1: FYLF and CRLF Surveys	
Mitigation Measure 3: FYLF Take Authorization	
Mitigation Measure 4: American Badger Surveys	
Mitigation Measure 6: WPT Surveys	
Mitigation Measure 8: BUOW Surveys	
Mitigation Measure 11: Notification of Lake and Streambed	
During Construction	
Mitigation Measure 2: FYLF and CRLF Avoidance	
Mitigation Measure 5: American Badger Avoidance	
Mitigation Measure 7: WPT Relocation	
Mitigation Measure 9: BUOW Avoidance	
Mitigation Measure 10: BUOW Passive Relocation and Mitigation	
Mitigation Measure 12: Water Diversion	