



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



October 31, 2022

Governor's Office of Planning & Research

NOV 01 2022

STATE CLEARING HOUSE

David Randall, Senior Planner
Department of Public Works and Planning
Development Services Division
2220 Tulare Street, Sixth Floor
Fresno, California 93721
(559) 600-4052
DRandall@FresnoCountyCA.gov

Subject: Notice of Preparation (NOP) – of a Recirculated Environmental Impact Report (EIR) No. 7896, Conditional Use Permit (CUP) No. 3685, Kamm Avenue Pistachio Processing Plant Project (Project) SCH No.: 2020090207

Dear David Randall:

The California Department of Fish and Wildlife (CDFW) received a NOP from Fresno County 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. While the comment period may have ended, CDFW would appreciate if you will still consider our comments.

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 and 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

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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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.

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 will 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 eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

PROJECT DESCRIPTION SUMMARY

Proponent: Kamm Avenue Pistachio Processing Plant

Objective: Kamm Avenue Pistachio Processing, LLC (Applicant) is proposing to construct and operate a pistachio processing facility to process nuts from nearby orchards and other areas. The Applicant proposes to construct, operate, and maintain a pistachio processing plant with three huller lines with an average annual processing capacity of 77 million pounds of pistachios. The Project would provide pistachio processing capacity in the immediate vicinity of existing pistachio orchards that currently ship harvested crops for processing to more remote locations, including processing plants located outside of Fresno County. The Project site would include (but is not limited to) 52 storage silos with a base diameter of 48-feet and a height of approximately 70-feet, various buildings, an onsite 2,130 square foot domestic water treatment facility, and access roads.

The Project would operate year-round to package and process harvested pistachios for retail and wholesale customers. During an approximately 60-day harvest period, which typically occurs between August and October, the Project would operate seven days a week and 24 hours per day to receive, hull, heat, dry and store pistachio crops in onsite storage silos. During non-harvest operations, the Project would operate two shifts per

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day, five or six days per week depending on pistachio product market conditions. The Project would have a full-time workforce of 200 employees. An additional 210 seasonal workers would be employed during the approximately 60-day harvest period. The primary pistachio processing facilities would be located within an approximately 80-acre fenced area bordered by Kamm Avenue to the north and agricultural fields to the south, east and west.

Two process water settling and cleaning ponds, each with 48 acre-feet of storage capacity, would be located along the southern area of the site and would be connected to the processing plant via an underground pipeline. Approximately 80 to 90 percent of all water used by the Project will be recaptured, cleaned, and used by local pistachio growers for irrigation.

Location: The proposed processing plant components of the Project would be located on two parcels totaling approximately 317.2 acres, on the south side of Kamm Avenue, approximately one mile west of Highway 33, and approximately 4.0 miles east of Interstate 5 in the western portion of unincorporated Fresno County (portions of Assessor's Parcel Numbers 38-030-17S and 038-300-30S). The unincorporated community of Three Rocks, a U.S. Census designated place, is located approximately 1.5 miles to the southeast of the proposed Project site. The California Aqueduct/San Luis Canal is located approximately one mile east of the Project.

Per Google aerial historical imagery, there was a basin in the northwest corner (outside but adjacent to the proposed Project limits) from approximately 2017 to 2020 with Kamm Avenue immediately north, and San Bernardino Avenue immediately west. Per Google aerial imagery (2022), the basin appears to have been filled in and now contains disturbed grassland. LandVision aerial photography shows that the northern portion of the Project area has already been disturbed and appears to have equipment in certain areas, silos, and a basin in the northeast corner. Agricultural fields are also in the proposed Project area.

Project information states that the site has not been farmed for approximately nine years (information was from a 2020 document). Additional information includes that since the site is vacant, it does not have agricultural "infrastructure" found on most of the nearby properties, and the site is unique in that it is adjacent to a major water line that can deliver large quantities of water that will be needed for the proposed pistachio processing facility.

Timeframe: None given.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Kamm Avenue Pistachio Processing Plant in adequately identifying and/or mitigating the

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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 for this Project.

The NOP indicates that the Environmental Impact Report (EIR) for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect and will analyze these potential effects to the detail necessary to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed project. When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation.

Based on aerial imagery, and species occurrence records from the California Natural Diversity Database (CNDDDB, 2022), the proposed Project site and/or surrounding area is known to and/or has the potential to support special-status species, and these resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities. CDFW is concerned regarding potential impacts to special-status species including, but not limited to, the Federally endangered (FE) and State threatened (ST) San Joaquin kit fox (*Vulpes macrotis mutica*), the ST Swainson's hawk (*Buteo swainsoni*), and the State species of special concern (SSC) burrowing owl (*Athene cunicularia*), American badger (*Taxidea taxus*), western spadefoot (*Spea hammondi*) and bat species.

San Joaquin kit fox (SJKF)

SJKF have been observed on the eastern boundary of the proposed Project in 2020 per CNDDDB records. Per Project information, the Processing Plant Site contains suitable habitat for denning and prey species including kangaroo rats (*Dipodomys* sp.), deer mice (*Peromyscus* sp.), cottontails (*Sylvilagus* sp.), pocket mice (*Perognathus* sp.), and other nocturnal rodents that would support SJKF foraging. The Project has the potential to temporarily disturb and permanently alter suitable habitat for SJKF and directly impact individuals if present during construction, recharge, and other activities.

In addition to natural habitats, SJKF den in a variety of areas such as right-of-ways, agricultural and fallow/ruderal habitat, dry stream channels, and canal levees, and populations can fluctuate over time. SJKF are also capable of occupying urban environments (Cypher and Frost 1999). SJKF may be attracted to the Project area due to the type and level of ground--disturbing activities and the loose, friable soils resulting from intensive ground disturbance. SJKF will forage in fallow and agricultural fields, which are present in the Project area, and use streams and canals as dispersal corridors. Project information states that a swale and two ponding basins will be created within Project limits. As a result, there is potential for SJKF to occupy all suitable habitat within the area near West Kamm Avenue and South San Bernardino Avenue, and the surrounding area.

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For all Project-specific components including construction and land conversion, CDFW recommends that a qualified biologist conduct a habitat assessment and protocol surveys for SJKF, including a 500-foot buffer, as part of the biological technical studies conducted in support of the CEQA document and, regardless of the results of the initial surveys that were conducted in 2020, repeat these surveys in accordance with the USFWS “Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance” (USFWS. 2011).

SJKF detection warrants consultation with CDFW to discuss how to avoid take or, if avoidance is not feasible, to acquire an Incidental Take Permit (ITP) prior to ground-disturbing activities, pursuant to Fish and Game Code section 2081 subdivision (b).

Swainson’s Hawk (SWHA)

SWHA were observed in the Project vicinity in 2020 per CNDDDB records and Project information and have the potential to forage in the Project area. CDFW recommends that a qualified wildlife biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial results, ten days prior to Project implementation to determine if the proposed Project area continues to contain suitable habitat for SWHA.

If it is determined through the habitat assessment that habitat suitable to support SWHA is still present within or near the Project site, CDFW recommends surveys for nesting SWHA following the survey methods developed by the Swainson’s Hawk Technical Advisory Committee (SWHA TAC, 2000). The survey protocol includes early season surveys to assist the project proponent in implementing necessary avoidance and minimization measures, and in identifying active nest sites prior to initiating ground-disturbing activities.

The Project as proposed will involve noise, groundwork, and movement of workers that could affect nests in the vicinity of the Project and has the potential to result in nest abandonment, significantly impacting local nesting SWHA. Without appropriate avoidance and minimization measures for SWHA, potential significant impacts that may result from Project activities include loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), and direct mortality. Any take of SWHA without appropriate incidental take authorization would be a violation of Fish and Game Code.

If ground-disturbing Project activities are to take place during the breeding season (February 1 through September 30), CDFW recommends that additional pre-activity surveys for active nests be conducted by a qualified biologist no more than 10 days prior to the start of Project implementation. CDFW recommends a minimum no-

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disturbance buffer of ½ mile be delineated around active nests until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

CDFW recommends compensation for the loss of SWHA foraging habitat to reduce impacts to SWHA foraging habitat to less than significant based on CDFW's "Staff Report Regarding Mitigation for Impacts to Swainson's Hawks" (CDFG, 1994), which recommends that mitigation for habitat loss occur within a minimum distance of 10 miles from known nest sites with the amount of habitat compensation dependent on nest proximity. In addition to fee title acquisition or a conservation easement recorded on property with suitable grassland habitat features, mitigation may occur by the purchase of conservation or suitable agricultural easements. Suitable agricultural easements would include areas limited to production of crops such as alfalfa, dry land and irrigated pasture, and cereal grain crops. Vineyards, orchards, cotton fields, and other dense vegetation do not provide adequate foraging habitat.

In addition, CDFW recommends that in the event an active SWHA nest is detected during surveys and the ½-mile no-disturbance buffer around the nest cannot feasibly be implemented, 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 warranted to comply with CESA

Burrowing Owl (BUOW)

BUOW have been observed in the proposed Project vicinity near the California Aqueduct/San Luis Canal to the southeast of the Project site (CNDDDB 2022). BUOW inhabit open grassland or adjacent canal banks, rights-of-way, vacant lots, etc., containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. BUOW rely on burrow habitat year-round for their survival and reproduction. Habitat loss and degradation are considered the greatest threats to BUOW in California's Central Valley (Gervais et al. 2008). Potentially significant direct impacts associated with subsequent construction 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.

The Project site is bordered mainly by agriculture and what appears to be disturbed habitat/grassland on a much smaller scale. Subsequent 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.

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Review of Google aerial imagery shows there is disturbed grassland present within proposed Project limits. Per Project information, although the grassland has been disturbed and is regularly maintained by grazing, disking and mowing, it could potentially support nesting and foraging habitat for BUOW.

CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the CEQA document to determine if the Project area or its vicinity contains suitable habitat for BUOW, and then repeat the focused surveys for the BUOW, regardless of the initial results, ten days prior to Project implementation. In addition, also 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, the California Burrowing Owl Consortium (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.

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)

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

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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.

American Badger (AMBA)

AMBA are known to occur in the vicinity of the Project site (CDFW 2022). CDFW recommends that a qualified biologist determine if suitable habitat for AMBA is present within or immediately adjacent to the Project site.

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). Habitat loss is a primary threat to AMBA (Gittleman et al. 2001). Per Project information, the Project site could likely contain prey for the AMBA. As a result, ground-disturbing activities have the potential to significantly impact local populations of AMBA.

CDFW recommends that a qualified biologist conduct focused surveys for AMBA as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial result, ten days prior to Project implementation.

If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for AMBA and their requisite habitat features (dens) to evaluate potential impacts resulting from ground- and vegetation-disturbance. Avoidance whenever possible is encouraged via delineation and observation of a 50-foot no-disturbance buffer around dens until it is determined through non-invasive means that individuals occupying the den have dispersed.

Western Spadefoot (WESP)

Per Project information, based on site conditions during the on-site surveys, aquatic resources including seven irrigation basins that were present within proposed Project limits could provide habitat that could potentially support breeding and overwintering for western spadefoot. This species inhabits grassland habitats, breeds in seasonal wetlands, and seeks refuge in upland habitat where they occupy burrows outside of the breeding season (Thomson et al. 2016).

Habitat loss and fragmentation resulting from agricultural and urban development is the primary threat to western spadefoot (Thomson et al. 2016). As a result, ground-disturbing activities associated with development of the Project site have the potential to significantly impact local populations of this species.

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CDFW recommends that a qualified biologist conduct focused surveys for WESP as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial result, ten days prior to Project implementation.

Avoidance whenever possible is encouraged via delineation and observance of a 50-foot no-disturbance buffer around burrows. If western spadefoot are observed on the Project site, CDFW recommends that Project activities in their immediate vicinity cease and individuals be allowed to leave the Project site on their own accord. Alternatively, a qualified biologist with appropriate take authorization can move them out of harm's way and to a suitable location.

Bats

Project information states that habitat within the study area provides foraging habitat and limited areas in outbuildings that could support roosting bats. There are structures within the Processing Plant Site that could also potentially support roosting bats. The surrounding orchards, annual grassland habitat and irrigation basins could provide foraging habitat for bats, and foraging bats were observed during the spotlighting surveys on the west side of the study area.

Without appropriate avoidance and minimization measures for special status bats, potentially significant impacts associated with the future development of the Project area could include roost abandonment, which may result in reduced health or vigor of young, and/or direct mortality.

CDFW recommends that a qualified biologist conduct focused surveys for bats as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial result, ten days prior to Project implementation

Bat populations have been in decline due to loss of foraging and roosting habitat to development, agriculture, and other human related activities (Brylski et al., 1998). Encroachment into bat habitat also increases species associated with human activity that prey on bats (Brylski et al., 1998). Roost fidelity and highly visible roost locations increases the vulnerability of bat species (Brylski et al., 1998). Impacts to roosting and foraging habitat within the Project area have the potential to significantly impact local populations of these species.

If bats are found to occupy the Project site, CDFW recommends establishing a 100-foot no-disturbance buffer around roost sites, installing temporary exclusionary devices at the appropriate time of year to avoid take, and installing new roost sites prior to initiation of Project-related activities to allow enough time for bats to relocate. CDFW

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recommends consultation and specific notice if bats may be disturbed by Project-related activities.

II. Editorial Comments and/or Suggestions

Nesting Birds: The Project site contains and is adjacent to habitat that provides nesting habitat for birds. CDFW encourages that Project implementation occur during the bird non-nesting season. However, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes sections referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct an assessment of nesting habitat during biological surveys in support of the project's CEQA document, and then repeated as pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. Prior to initiation of Project activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once Project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that 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 compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Federally Listed Species: CDFW recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to, the California tiger salamander. Take under the Federal Endangered Species Act (FESA) is more

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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.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the project's CEQA document 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, remaining impacts to sensitive biological resources should be mitigated to reduce impacts to a less than significant level, if feasible.

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

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 CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.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

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

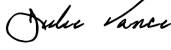
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of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CDFW appreciates the opportunity to comment on the Project to assist Fresno County Department of Public Works and Planning 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 Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at Kelley.Nelson@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

ec: Patricia Cole (patricia_cole@fws.gov)
United States Fish and Wildlife Service

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SWHA Literature Citations

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TBEB/Bats Literature Citations

Brylski, Phillip V., Paul W. Collins, Elizabeth D. Pierson, William E. Rainey, and Thomas E. Kucera, 1998. Terrestrial mammal species of special concern in California (Betsy C. Bolster, editor). California Department of Fish and Game. May 1998.