



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



January 18, 2022

Michael Hagman, District Manager  
Lindmore Irrigation District  
315 East Lindmore Avenue  
Lindsay, California 93247  
[mhagman@lindmoreid.com](mailto:mhagman@lindmoreid.com)

**Subject: Lindmore Irrigation District Multi-Benefit Basin Project (Project)  
Mitigated Negative Declaration (MND)  
State Clearinghouse No.: 2021120433**

Dear Mr. Hagman:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the Lindmore Irrigation District (Lindmore ID) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

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.

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<sup>1</sup> 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 will be required.

**Bird Protection:** CDFW has jurisdiction over actions that may 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 section 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird).

**Water Rights:** The capture of unallocated stream flows to artificially recharge groundwater aquifers is subject to appropriation and approval by the State Water Resources Control Board (SWRCB) pursuant to Water Code section 1200 et seq. CDFW, as Trustee Agency, is consulted by SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Certain fish and wildlife are reliant upon aquatic and riparian ecosystems, which in turn are reliant upon adequate flows of water. CDFW therefore has a material interest in assuring that adequate water flows within streams for the protection, maintenance, and proper stewardship of those resources. CDFW provides, as available, biological expertise to review and comment on environmental documents and impacts arising from Project activities.

## **PROJECT DESCRIPTION SUMMARY**

The Project proposes to construct several groundwater recharge basin facilities over several phases, totaling 320 acres. The lands have been historically farmed and are currently fallowed, and one rural residence on the corner of the site will remain. The first phase is funded by the Wildlife Conservation Board and will involve construction of 80 acres of basins with habitat for migrating birds created by adding islands to the basins and sloping the floors to create varying water levels to benefit a wide diversity of shorebirds and other waterbirds. The first phase of basins will be designed around the residence that is located on that parcel, and construction of other basins in the remaining 240 acres will occur during subsequent phases. The basin property currently sits outside of the Lindmore ID boundaries and is being annexed into the Lindmore ID as part of this Project.

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Construction of each basin will include equipment mobilization, earthwork for excavation of recharge/regulation basins, and construction of basin perimeter berms of no greater than six feet in external height. Project components include constructing ponds/cells within the basins separated by levees, as well as performance testing and demobilization, and the depth of cut is estimated to be four to six feet.

Two pipeline tie-in locations of a 1-mile each may be constructed to tie into District facilities in Road 196. A 36-inch diameter pipeline would be placed a minimum of 36 inches below ground, within a trench approximately six to eight feet deep and seven to eight feet wide. Two pipeline route options are evaluated: Option 1 on Road 20 from Road 118 to Road 196, and Option 2 on Heber Avenue from Road 188 to Road 196.

The Project is anticipated to recharge a minimum of 720 acre-feet of surface water. The basin and its associated facilities will be maintained by Lindmore ID staff. Water will be delivered to the basin site via the selected pipeline and will be gravity fed. The East Kaweah Groundwater Sustainability Agency holds jurisdiction over the Project area and is responsible for implementing a Groundwater Sustainability Plan, and any water delivered to the Project site would be accounted for under the Groundwater Sustainability Plan.

**Proponent:** Lindmore ID

**Location:** The Project is located in southwest Tulare County, southwest of the City of Lindsay near the Census Designated Place of Plainview. The cross streets are Avenue 212 and Belmont Road. The Project properties are located in Assessor's Parcel Numbers 198-100-006, -007, and -008; and 198-110-002 and -003.

**Timeframe:** None given for the entire Project, which will be constructed in phases. Active construction of the basins is estimated to take from four to six months.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist Lindmore ID in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife, i.e., biological resources. Editorial comments or other suggestions may also be included to improve the document.

Based on a review of the Project description, a review of California Natural Diversity Database (CNDDDB) records, and a review of aerial photographs of the Project and surrounding habitat, several special-status species could potentially be impacted by Project activities including but not limited to the State threatened and federal endangered San Joaquin kit fox (*Vulpes macrotis mutica*), the State threatened Swainson's hawk (*Buteo swainsoni*), and the State species of special concern

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burrowing owl (*Athene cunicularia*). Other species of birds, amphibians, reptiles, mammals, fish, and plants also compose the local ecosystem.

Please note that the CNDDDB is populated by and records voluntary submissions 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 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 wildlife 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 area.

CDFW recommends that the following modifications and/or edits be incorporated into the MND, including proposed avoidance, minimization, and compensatory measures, prior to its adoption by Lindmore ID

**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 United States Fish and Wildlife Service (USFWS)?**

**COMMENT 1: San Joaquin Kit Fox (SJKF)**

**Issues and Impacts:** SJKF occurrences have been documented within the vicinity of the Project boundary (CDFW 2021). The MND acknowledges the potential for the Project to temporarily disturb and permanently alter suitable habitat for special status species including SJKF, and to directly impact individuals if present during construction activities.

SJKF den in rights-of-way, agricultural and fallow/ruderal habitat, dry stream channels, and canal levees, etc., and populations can fluctuate over time. SJKF are also capable of occupying urban environments (Cypher and Frost 1999). SJKF may be attracted to Project areas 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 and utilize streams and canals as dispersal corridors. Absence in any one year is not necessarily a reliable predictor of future SJKF potential to occur on a site. As a result, there is potential for SJKF to occupy all suitable habitat within the Project boundary and surrounding area. Without appropriate avoidance and minimization measures for SJKF, potential significant impacts associated with construction include habitat loss, den collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of young, and direct mortality of individuals.

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**Evidence impact is potentially significant:** Habitat loss resulting from land conversion to agricultural, urban, and industrial development is the primary threat to SJKF, and the Project area is in the vicinity of areas of high and medium suitability SJKF habitat (Cypher et al. 2013).

**Recommended Mitigation Measure 1: SJKF Habitat Assessment**

For all Project-specific components including construction and land conversion, CDFW recommends that a qualified biologist conduct a habitat assessment in advance of Project implementation, to determine if the Project area or its immediate vicinity contains suitable habitat for SJKF.

**Recommended Mitigation Measure 2: SJKF Surveys and Minimization**

CDFW recommends assessing presence or absence of SJKF by having qualified biologists conduct surveys of Project areas and a 500-foot buffer of Project areas to detect SJKF and their sign. CDFW recommends that presence/absence of SJKF be assessed by conducting surveys and that den avoidance buffers be implemented by following the USFWS “Standardized recommendations for protection of the San Joaquin kit fox prior to or during ground disturbance” (2011). Specifically, CDFW advises conducting surveys in all areas of potentially suitable habitat no less than 14 days and no more than 30 days prior to beginning of ground-disturbing activities.

**Recommended Mitigation Measure 3: SJKF Take Authorization**

SJKF activity or 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 any ground-disturbing activities, pursuant to Fish and Game Code section 2081, subdivision (b).

**COMMENT 2: Swainson’s Hawk (SWHA)**

**Issues and Impacts:** SWHA occurrences have been documented within and the Project vicinity (CDFW 2021). The MND acknowledges the potential for the Project to impact nesting SWHA, and Mitigation Measure BIO-3 states that a biologist would determine appropriate setback distances based on applicable CDFW and/or USFWS guidelines and/or the biology of the species. Without appropriate avoidance and minimization measures for SWHA, potential significant impacts that may result from Project activities include nest abandonment, loss of nest trees, 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.

**Evidence impact is potentially significant:** SWHA exhibit high nest-site fidelity year after year and lack of suitable nesting habitat in the San Joaquin Valley limits their local distribution and abundance (CDFW 2016). Approval of the Project may lead to subsequent ground-disturbing activities that involve noise, groundwork, and

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movement of workers that could affect nests and has the potential to result in nest abandonment and loss of foraging habitat, significantly impacting local nesting SWHA.

**Recommended Mitigation Measure 4: SWHA Surveys**

CDFW recommends that a qualified biologist conduct surveys for nesting SWHA following the survey methods developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC 2000) prior to Project implementation. Mitigation Measure BIO-2 states that preconstruction surveys will be conducted within a ½-mile survey distance from the construction area for SWHA. The SWHA TAC 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.

**Recommended Mitigation Measure 5: SWHA No-Disturbance Buffer**

If ground-disturbing activities are to take place during the nesting season of March 1 through August 31, 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 that a minimum no-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.

**Recommended Mitigation Measure 6: SWHA Take Authorization**

CDFW recommends that in the event an active SWHA nest is detected during surveys, 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.

**COMMENT 3: Burrowing Owl (BUOW)**

**Issues and Impacts:** BUOW inhabit open grassland containing small mammal burrows, a requisite habitat feature used by BUOW for nesting and cover. BUOW may also occur in some agricultural areas, ruderal grassy fields, vacant lots, and pastures if the vegetation structure is suitable and there are useable burrows and foraging habitat in the area (Gervais et al. 2008). Habitat both in the Project site and the Project vicinity supports suitable habitat for BUOW (CDFW 2021). Potentially significant impacts to nesting and non-nesting BUOW can occur as a result of ground-impacting activity, such as grading and flooding within active and fallow agricultural areas, and as a result of noise, vibration, and other disturbance caused by equipment and crews. Potential impacts associated with Project activities and land conversion include habitat loss, burrow collapse, inadvertent entrapment, nest

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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. The Project and surrounding area contain remnant undeveloped land but is otherwise intensively managed for agriculture; therefore, subsequent ground-disturbing activities associated with subsequent constructions 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 Mitigation Measure 7: BUOW Habitat Assessment**

CDFW recommends that a qualified biologist conduct a habitat assessment in advance of implementation of Project activities, to determine if the Project area or its vicinity contains suitable habitat for BUOW.

**Recommended Mitigation Measure 8: BUOW Surveys**

Where suitable habitat is present on or in the vicinity of the Project area, CDFW recommends assessing presence or absence of BUOW by having a qualified biologist conduct surveys following the California Burrowing Owl Consortium (1993) “Burrowing Owl Survey Protocol and Mitigation Guidelines” and the CDFG (2012) “Staff Report on Burrowing Owl Mitigation”. Specifically, these documents suggest three or more surveillance surveys conducted during daylight, with each visit occurring at least three weeks apart during the peak breeding season of April 15 to July 15, when BUOW are most detectable. In addition, CDFW advises that surveys include a minimum 500-foot survey radius around the Project area.

**Recommended Mitigation Measure 9: BUOW Avoidance**

CDFW recommends that no-disturbance buffers, as outlined by CDFG (2012), be implemented prior to and during any ground-disturbing activities, and specifically 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)

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**Recommended Mitigation Measure10: BUOW Eviction and Mitigation**

If BUOW are found within these recommended buffers and avoidance is not possible, it is important to note that according to CDFG (2012), evicting birds from burrows is not a take avoidance, minimization, or mitigation method and is instead considered a potentially significant impact under CEQA. If it is necessary for Project implementation, 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 then recommends mitigation in the form of replacement of occupied burrows with artificial burrows at a minimum ratio of one burrow collapsed to one artificial burrow constructed (1:1) to mitigate for evicting BUOW and the loss of burrows. 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.

**Editorial Comments and/or Suggestions**

**Riparian and Aquatic Impacts:** Watershed and habitat protection are vital to the management of California's diverse fish, wildlife, and plant resources. The Project may affect the aquatic and riparian habitat and associated species by reducing the amount of surface flow in active stream channels and downstream, as well as reducing the amount of subsurface flow from percolation.

MND Sections 4.4.1.2 state that the Project lies within the Elk Bayou watershed, Hydrologic Unit Code (HUC): 1803000608 and two subwatersheds: Upper Elk Bayou subwatershed; HUC: 180300060803 and Middle Elk Bayou; HUC: 180300060804. The MND states that the Elk Bayou watershed is composed of stormwater or snowmelt collected in upland areas that flows into the two subwatersheds from Lewis Creek and Frazier Creek into canals that are used to irrigate agricultural fields. The runoff from these agricultural fields run into canals that lead to the Elk Bayou stream, which flows into the Tule River and thence the Tulare Lake basin. The nearest surface water is Lindmore ID Canal and is located one mile northwest of the Project site. The Project is also located approximately 3.5 miles north of the North Fork Tule River.

The riparian vegetation in the Elk Bayou watershed and Tule River provides crucial habitat for many species, including those with special status such as SWHA, which was listed as threatened in 1983 based on loss of habitat and decreased numbers across the state. SWHA often nest in riparian vegetation located near high quality foraging habitat such as grasslands, pasture, and suitable agriculture crops such as alfalfa. Degradation and loss of riparian habitat due to insufficient instream flows pose a threat to the recovery of SWHA that occupy these streams during the nesting season.

The MND is vague about whether the Project will result in reduced surface flow in streams for the purpose of groundwater recharge and storage. CDFW is concerned



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that the proposed Project may result in direct and cumulative adverse impacts to the fish and wildlife and other public trust resources supported by the Elk Bayou and Tule River and associated riparian habitats, and that any proposed reduction in surface flow will affect the sustainability of the riparian woodland and aquatic habitats within these streams. CDFW recommends that the MND be amended and recirculated with a hydrologic study or other information that identifies and analyzes the impacts of surface and subsurface water reduction on the riparian woodland and aquatic habitats associated with these streams and the species supported by these habitats, and includes appropriate measures to avoid, minimize, and mitigate potential biological impacts due to surface flow reduction.

**Water Rights:** The MND did not specify whether the Project diverts unallocated surface flow for the purpose of groundwater storage. As stated previously, the capture of unallocated stream flows to artificially recharge groundwater aquifers is subject to appropriation and approval by the SWRCB pursuant to Water Code section 1200 et seq. CDFW recommends that the MND include a detailed description of the water rights and water entitlements that would pertain to the Project and address any applications or change petitions that Lindmore ID will be filing. CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Given the potential for impacts to sensitive species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

**Lake and Streambed Alteration:** Project activities that have the potential to substantially change the bed, bank, and channel of streams and associated wetlands that are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. 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 or Streambed Alteration (LSA) Agreement; therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts, a subsequent CEQA analysis may be necessary for LSA Agreement issuance. Additional information on notification requirements is available through the Central Region LSA Program at (559) 243-4593 or [R4LSA@wildlife.ca.gov](mailto:R4LSA@wildlife.ca.gov) and the CDFW website: <https://wildlife.ca.gov/Conservation/LSA>.

**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

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(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).

CDFW encourages that Project implementation occur during the bird non-nesting season; however, if Project activities must occur during the breeding season (i.e., February through mid-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 Code sections as referenced above.

To evaluate Project-related impacts to nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground disturbance to maximize the probability that nests that could potentially be impacted by the Project are detected. CDFW also recommends that surveys cover a sufficient area around the work site to identify nests and determine their status. A sufficient area means any area potentially affected by the 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 construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends that a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends that the work causing that change cease and that CDFW be consulted 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 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 construction area would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers.

**Endangered Species Act Consultation:** CDFW recommends consultation with the USFWS prior to Project ground disturbance, due to potential impacts to Federal listed species. Take under the ESA is more stringently defined than under CESA; take under ESA may also include 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.

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## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database that 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 (CNDDDB). The CNDDDB field survey form can be obtained 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](mailto: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>.

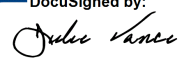
## FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of 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 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 MND to assist Lindmore ID in identifying and mitigating Project impacts on biological resources. If you have questions regarding this letter, please contact Annette Tenneboe, Senior Environmental Scientist (Specialist), at (559) 580-3202 or by email at [Annette.Tenneboe@wildlife.ca.gov](mailto:Annette.Tenneboe@wildlife.ca.gov).

Sincerely,

DocuSigned by:  
  
FA83F09FE08945A...  
Julie A. Vance  
Regional Manager

Attachment

cc: See Page Twelve

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ec: Office of Planning and Research  
State Clearinghouse

Annette Tenneboe  
California Department of Fish and Wildlife

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## REFERENCES

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Attachment 1

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

**PROJECT: Lindmore Irrigation District Multi-Benefit Basin Project  
SCH No.: 2021120433**

<b>RECOMMENDED MITIGATION MEASURES</b>	<b>STATUS/DATE/INITIALS</b>
<i>Before Project Activity</i>	
<b>Recommended Mitigation Measure 1: SJKF Habitat Assessment</b>	
<b>Recommended Mitigation Measure 2: SJKF Surveys and Minimization</b>	
<b>Recommended Mitigation Measure 3: SJKF Take Authorization</b>	
<b>Recommended Mitigation Measure 4: SWHA Surveys</b>	
<b>Recommended Mitigation Measure 5: SWHA No-disturbance Buffer</b>	
<b>Recommended Mitigation Measure 6: SWHA Take Authorization</b>	
<b>Recommended Mitigation Measure 7: BUOW Habitat Assessment</b>	
<b>Recommended Mitigation Measure 8: BUOW Surveys</b>	
<b>Recommended Mitigation Measure 9: BUOW Avoidance</b>	
<b>Recommended Mitigation Measure 10: BUOW Eviction and Mitigation</b>	
<i>During Project Activity</i>	
<b>Recommended Mitigation Measure 2 SJKF Surveys and Minimization</b>	
<b>Recommended Mitigation Measure 5: SWHA No-disturbance Buffers</b>	
<b>Recommended Mitigation Measure 9: BUOW Avoidance</b>	