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April 19, 2024

Governor's Office of Planning & Research

Apr 19 2024

STATE CLEARINGHOUSE

Matthew Hurley
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McMullin Area Groundwater Sustainability Agency
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**Subject: Aquaterra Water Bank (Project)
Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2024030640**

Dear Matthew Hurley:

The California Department of Fish and Wildlife (CDFW) received an Notice of Intent to Adopt an MND from McMullin Area Groundwater Sustainability Agency (MAGSA), which is the Lead Agency for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

While the comment period may have ended, CDFW respectfully requests that McMullin Area Groundwater Sustainability Agency 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 & 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

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.

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 2

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.

Other Special-Status Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened on any State or federal list pursuant to CESA and/or the federal Endangered Species Act (ESA) to be considered Endangered, Rare, or Threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Project.

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.

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 3

PROJECT DESCRIPTION SUMMARY

Proponent: MAGSA is the Lead Agency for the Project.

Proposed Project: The Project will provide additional bank storage to maximize the capture and use of allocated waters, by allowing contractors to store excess contract water and flood water during wet years and recover this water in normal or dry years. The Project will develop infrastructure to receive water from and convey water to the James Bypass and the Mendota Pool. Received waters will be conveyed to recharge basins during wet periods and returned to the Mendota Pool during dry periods as part of operations of the Project. Farmers will voluntarily participate in this program and agricultural fields will also remain active, as the banking program is compatible with farming practices (e.g., planting, fallowing, and harvesting).

The Project will include the following components:

- Establish 800,000 acre-feet of bank storage operations underlying the MAGSA area, which is adjacent to and will accept water from the Fresno Slough and Mendota Pool.
- Divert and recharge 208,000 acre-feet per year of contract water into the bank over a five-month period (November through March) of any given year, and subsequently recover up to 148,000 acre-feet per year of contract water from the Bank over a five-month period for use by State Water Project and Central Valley Project contractors.
- Construction of conveyance infrastructure and temporary construction easements of 63.5 linear miles by 200 feet horizontal width (approximately 1,804 acres total), including main canal levees, lateral levees, pump stations along the main canals with pumps, recovery wells, staging areas, and road crossings.
- Develop 480 cubic feet per second of recovery (extraction) capacity.
- Install two conveyance facilities for recharge and recovery.
- Ten percent of each deposit will be left behind in the water bank to offset operational and evaporative losses.
- 3,294 acres of farmland will be used for recharge basins.

Objectives: The Project will establish the Aquaterra Water Bank for use by local, regional, and statewide entities to improve their use of available surface water supplies. The Project is also intended to help MAGSA in achieving sustainable groundwater management for local water and agricultural sustainability, in compliance with the Sustainable Groundwater Management Act.

Location: The Project will be located in Fresno County and the Kings Subbasin, all within the approximately 120,000-acre MAGSA management area.

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 4

Timeframe: Construction will take approximately 3.5 years. Recharge deposits to the bank are expected to occur primarily from November through March and contract water recovery withdrawals are expected to occur from May through September.

RECOMMENDATIONS

CDFW offers the recommendations below to assist MAGSA in adequately identifying and/or mitigating the Project's significant or potentially significant direct and indirect impacts on fish and wildlife (biological) resources.

Water supply sources for the Project may include the California Aqueduct, Delta Mendota Canal, San Luis Reservoir, San Joaquin River, and Kings River, and water may be received and diverted at the Mendota Pool and Fresno Slough. The valley floor reach of the San Joaquin River at Mendota Pool, Kings River, Fresno Slough / James Bypass, and surrounding areas are known to support species that are threatened or endangered under CESA and/or ESA, in addition to other special-status species. Project-related construction activities within the Project boundary, including but not limited to construction and operation of water banking facilities and introduction of surface water flows for storage, could impact the special-status plant and wildlife species and habitats known to occur in the area.

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 federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*), the State threatened Swainson's hawk (*Buteo swainsoni*) and tricolored blackbird (*Agelaius tricolor*), the federal proposed threatened and State species of special concern western pond turtle (*Emys marmorata*), and the State species of special concern burrowing owl (*Athene cunicularia*). The Project could also indirectly impact the State and federally threatened giant garter snake (*Thamnophis gigas*). 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 MAGSA.

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 5

COMMENT 1: San Joaquin Kit Fox (SJKF)

SJKF has been documented in close proximity to the Project site (CDFW 2024). SJKF den in rights-of-way, vacant lots, and other disturbed areas in addition to undisturbed habitats, and populations can fluctuate over time. Absence in any one year is not necessarily a reliable predictor of future SJKF potential to occur on a site. CDFW concurs with Mitigation Measure KF#1 requiring that the United States Fish and Wildlife Service (USFWS) *Standardized recommendations for protection of the SJKF prior to or during ground disturbance* (2011) be followed for any ground-disturbing or water recharge activities occurring within the Project site. Mitigation Measure KF#3 requires that pre-Project surveys be conducted within 30 days prior to the beginning of any Project activity that could impact SJKF, to identify any SJKF individuals and their sign. CDFW recommends that pre-Project surveys and avoidance also incorporate a 500-foot buffer around the Project site. Mitigation Measure KF#4 requires that SJKF den detection before or during Project activity warrants consultation with CDFW and USFWS to discuss how to implement the Project and avoid take.

Recommended Mitigation Measure 1: SJKF Surveys and Avoidance

CDFW recommends assessing presence/absence of SJKF by having qualified biologists conducting surveys of Project areas and a 500-foot buffer of Project areas to detect SJKF, dens, and other sign. CDFW also recommends following the USFWS (2011) *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* during Project implementation.

Recommended Mitigation Measure 2: SJKF Take Authorization

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

COMMENT 2: Swainson's Hawk (SWHA)

Swainson's hawk is documented within the MAGSA boundary and surrounding area and has the potential to nest in trees within the Project area (CDFW 2024). Impacts to nesting Swainson's hawk can occur through disturbance related to the establishment or operation of pumps, wells, pipelines, or other Project activities. The MND acknowledges that suitable nesting habitat occurs within the Project area and Mitigation Measure SH#2 requires surveys for hawks within 30 days of the onset of construction. Mitigation Measure SH#3 requires a ½-mile radius buffer around a SWHA nest, or as needed to adequately protect the nest in the context of the actions planned at that location. The analysis does not provide a biological basis of how this mitigation measure is determined adequate to avoid significant impacts, including but not limited to take of individuals through nest failure or other means, as a result of Project implementation. Without appropriate avoidance and minimization measures for SWHA, potential

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 6

significant impacts associated with Project activities include loss of foraging and/or nesting habitat, nest abandonment, reduced reproductive success, and reduced health and vigor of eggs and/or young.

Recommended Mitigation Measure 3: Focused SWHA Surveys

To reduce potential Project-related impacts to SWHA, CDFW recommends that a qualified biologist conduct surveys for nesting SWHA following the survey methodology developed by the SWHA Technical Advisory Committee (SWHA TAC 2000) during the nesting season of or prior to Project initiation, within the Project area and a ½-mile buffer around the Project area. In addition, if Project activities will take place during the species nesting season (i.e., March 1 through September 15), CDFW recommends that additional preconstruction surveys for active nests be conducted by a qualified biologist no more than 10 days prior to the start of construction.

Recommended Mitigation Measure 4: SWHA Buffers

If an active SWHA nest is found during focused surveys, CDFW recommends implementing a minimum ½-mile no-disturbance buffer 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 site for survival.

Recommended Mitigation Measure 5: SWHA Take Authorization

If a ½-mile no-disturbance nest buffer is not feasible, consultation with CDFW is warranted, and an Incidental Take Permit for SWHA may be necessary prior to project implementation to avoid unauthorized take, pursuant to Fish and Game Code section 2081, subdivision (b).

COMMENT 3: Burrowing Owl (BUOW)

The MND acknowledges that burrowing owls are known to nest and winter within the vicinity of the Project and the Project area contains suitable habitat for burrowing owls; however, the MND recommends surveys for surveys for BUOW only within the Main Canal alignment of the Project. Impacts to nesting and non-nesting burrowing owls 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.

Recommended Mitigation Measure 6: 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's *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and CDFW's *Staff Report on Burrowing Owl Mitigation* (CDFG 2012). These reports suggest three or more surveillance surveys conducted during daylight with each visit

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 7

occurring at least three weeks apart during the peak breeding season (i.e., April 15 to July 15), when BUOW are most detectable. In addition, CDFW advises that surveys include a minimum 500-foot radius around the Project area.

Recommended Mitigation Measure 7: BUOW Avoidance

CDFW recommends that 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 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)

Recommended Mitigation Measure 8: BUOW Eviction and Mitigation

If BUOW are found within the recommended buffers and avoidance is not possible, it is important to note that evicting birds from burrows is not an avoidance, minimization, or mitigation method and is instead considered a potentially significant impact under CEQA (CDFG 2012). If it is necessary for Project implementation, CDFW recommends that burrow eviction 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 ratio of one burrow collapsed to one artificial burrow constructed (1:1) to mitigate for evicting BUOW and the loss of burrows. Because BUOW may attempt to colonize or re-colonize an area that will be impacted, CDFW recommends ongoing surveillance that is sufficient to detect BUOW if they return.

COMMENT 4: Western Pond Turtle (WPT)

WPT occur in the Project area (CDFW 2024), and a review of aerial imagery shows habitats that WPT utilize for nesting, overwintering, dispersal, and basking, including streams, ponded areas, irrigation canals, and riparian and upland habitats. 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). Noise, vegetation removal, movement of workers, construction, and ground disturbance as a result of Project activities have the potential to significantly impact

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 8

WPT populations. 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.

Recommended Mitigation Measure 9: WPT Surveys

In areas of suitable habitat, CDFW recommends that a qualified biologist conduct focused surveys for WPT within 10 days prior to Project implementation, and that focused surveys for nests occur during the egg-laying season of March through August.

Recommended Mitigation Measure 10: WPT Avoidance and Minimization

CDFW recommends that any WPT nests that are discovered remain undisturbed with a no-disturbance buffer maintained around the nest until the eggs have hatched and neonates are no longer in the nest or Project areas. If WPT individuals are discovered at the site during surveys or Project activities, CDFW recommends that they be allowed to move out of the area of their own volition without disturbance.

EDITORIAL COMMENTS AND/OR SUGGESTIONS

Mendota Wildlife Area: CDFW is also a water contractor and the landowner and manager of the Mendota Wildlife Area (MWA) on Fresno Slough, and as such has a vested interest in water quality in the Fresno Slough, in addition to firsthand management experience with the effects of water use in the area affected by the proposed Project. The MWA has been significantly affected by groundwater over drafting, subsidence, and lowered water quality.

The MWA is located within the Delta-Mendota Subbasin and borders the Westside Subbasin. Both the Westside and Delta-Mendota Subbasins are designated as critically over drafted by the California Department of Water Resources, and such over drafting is a serious issue within the Mendota Pool area due to ongoing subsidence. Continued subsidence affects the ability of CDFW to operate the MWA according to its management objectives, and other areas where water can no longer be delivered by gravity could increasingly result in loss of associated wetland and riparian habitat. Subsidence is irreversible and damage to surface water conveyance features caused by subsidence can only be mitigated by removal of damaged infrastructure and replacement, or re-engineering and reconstruction of infrastructure to allow surface water to flow at an acceptable level, at significant expense.

Water quality has been another issue affecting the MWA. In prior years, United States Bureau of Reclamation has approved the transfer of Central Valley Project surface flow that may have otherwise entered the Mendota Pool, and lower quality groundwater was instead be pumped into the Mendota Pool. Prior water quality monitoring results have demonstrated that groundwater supplied to Mendota Pool is consistently more saline than surface waters within the Delta Mendota Canal. Consequently, CDFW is

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 9

concerned with “salt loading” into the Mendota Pool and the impact that it has on the water supply for the MWA. Lowered water quality and increased salt loading could potentially impact sensitive aquatic species such as the giant garter snake, and affect habitats for sensitive status species, especially in the cumulative context of other existing and pending projects affecting water quality and subsidence of Mendota Pool, the MWA, and surrounding areas.

As stated above, the Project description includes the installation, operation, and maintenance of a new turnout at Mendota Pool and banking of Central Valley Project water allocations would be permitted. CDFW recommends a thorough description and impact analysis to biological resources (including the MWA) regarding the Project-related transfer of water allocations and the installation, operation, and maintenance of a new turnout at Mendota Pool.

The Project would develop infrastructure to receive water from and convey water to the James Bypass, Mendota Pool, and Jensen and James Diversions. Project development at these locations may impact the MWA; for instance, the construction of pump facilities at the Jensen Canal adjacent to the MWA could impact the ability to draw water and could also result in an increase in the influx of aquatic weeds decreasing MWA’s ability to lift water at this location. CDFW recommends that the MND include an environmental analysis of these Project impacts to the MWA.

Water Rights: The Project description allows for the diversion of flood flow surface water for groundwater recharge. 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 may be filed. 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 special-status species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

Federally Listed Species: CDFW recommends consulting with the USFWS regarding potential impacts to federally listed species including, but not limited to, SJKF. Take under ESA is more broadly defined than CESA; take under ESA 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 ESA is advised well in advance of any Project activities.

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 10

Lake and Streambed Alteration: Project activities including construction and the diversion of flows are subject to the notification requirement of Fish and Game Code section 1602, which 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 Agreement (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 Agreement issuance. For additional information on notification requirements, please contact staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593 or R4LSA@willife.ca.gov, or the Program website: <https://wildlife.ca.gov/Conservation/LSA>.

Nesting birds: CDFW encourages Project implementation to occur during the bird non-nesting season; however, if Project activities must occur during the breeding season (February through mid-September), the Project proponent is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate Project-related impacts on 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 each Project activity 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 a project. In addition to direct impacts (i.e. nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of 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 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

Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 11

ecological reason to do so. CDFW recommends that a qualified wildlife biologist advises and supports any variance from these buffers and notify CDFW in advance of implementing a variance.

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

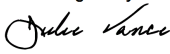
FILING FEES

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 provide comments as part of the public scoping process to assist MAGSA 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.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
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ec: Steve Brueggemann
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Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 12

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Matthew Hurley, McMullin Area Groundwater Sustainability Agency

April 19, 2024

Page 13

REFERENCES

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Attachment 1

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

**PROJECT: Aquaterra Water Bank
STATE CLEARINGHOUSE No.: 2024030640**

RECOMMENDED MITIGATION MEASURES	STATUS/DATE/INITIALS
<i>Before Project Activity</i>	
Recommended Mitigation Measure 1: SJKF Surveys and Avoidance	
Recommended Mitigation Measure 2: SJKF Take Authorization	
Recommended Mitigation Measure 3: Focused SWHA Surveys	
Recommended Mitigation Measure 4: SWHA Buffers	
Recommended Mitigation Measure 5: SWHA Take Authorization	
Recommended Mitigation Measure 6: BUOW Surveys	
Recommended Mitigation Measure 7: BUOW Avoidance	
Recommended Mitigation Measure 8: BUOW Eviction and Mitigation	
Recommended Mitigation Measure 9: WPT Surveys	
Recommended Mitigation Measure 10: WPT Avoidance and Minimization	
<i>During Project Activity</i>	
Recommended Mitigation Measure 1: SJKF Surveys and Minimization	
Recommended Mitigation Measure 4: SWHA Buffers	
Recommended Mitigation Measure 7: BUOW Avoidance	
Recommended Mitigation Measure 10: WPT Avoidance and Minimization	