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October 31, 2024

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**Subject: Cawelo Collection Basin and Pipeline Project (Project)
Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2024090952**

Dear David Ansolabehere:

The California Department of Fish and Wildlife (CDFW) received a MND from Cawelo Water District (CWD), as Lead Agency, for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802.). Similarly, for purposes of CEQA,

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is 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.

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Additionally, specified types of infrastructure projects may be eligible for an Incidental Take Permit (ITP) for unavoidable impacts to fully protected species if certain conditions are met (see Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process if an ITP may be pursued for the Project.

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).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T under CEQA Guidelines section 15380, CDFW recommends it should be fully considered in the environmental analysis for the Project.

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PROJECT DESCRIPTION SUMMARY

Proponent: Cawelo Water District

Objective: The Project proposes to construct a 13-acre-foot collection reservoir and a two-mile long, 18-inch diameter pipeline that would deliver treated oil produced water from the Trio Petroleum LLC facility to the Famoso Basin for groundwater recharge or, depending on surface water supplies, delivered through CWD's existing distribution system for direct application to irrigated crops.

Location: The Project site is located in Kern County, approximately 5.5 miles north of the City of Bakersfield, approximately four miles east of the City of Shafter, approximately 14.5 miles to the southeast of the City of Wasco, and approximately 13 miles southeast of the City of McFarland. The southeast corner of the pipeline would start at Section 3, T28, R27E, MDB&M, and end at CWD's Distribution Canal. The Project would cross State Route 65 approximately one mile north of Lerdo Highway. The pipeline corridor, reservoir, and a surrounding 100-foot buffer are within the following Kern County Assessor's Parcel Numbers (APNs): 481-012-04, 481-012-01, 481-011-16, 481-030-14, 481-030-15, 481-030-17, 481-030-18, 481-030-65, 481-030-10, 481-040-01, 481-040-19, 481-040-18, 481-040-17, 481-040-16, 481-040-15, 481-030-63, and 481-030-32.

Timeframe: The Project would commence in late 2024 with an anticipated completion date of May 2025.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist CWD in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the CEQA document prepared for this Project.

According to the MND and a review of aerial imagery, the Project site and surrounding vicinity is largely composed of semi-natural stands of primarily *Bromus ruben-Schismus* annual grasslands and allscale scrub, and agricultural lands including orchards, with developed land that includes oil extraction, solar fields, maintained dirt roadways, and supporting agricultural buildings. Approximately three acres of the Project site is comprised of agriculture, with the area surrounding the Project's planned expansion site also being comprised of agricultural lands.

Currently, the MND acknowledges that the Project site is within the geographic range of several special-status animal species and proposes specific mitigation measures to reduce impacts to less than significant; however, CDFW has concerns about the ability

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of some proposed mitigation measures to reduce impacts to less than significant and to avoid unauthorized take for several special-status species including, but not limited to, the State and federally endangered and State fully protected blunt-nosed leopard lizard (*Gambelia sila*), the State threatened and federally endangered San Joaquin kit fox (*Vulpes macrotis mutica*); the State candidate burrowing owl (*Athene cunicularia*) and and Crotch's bumble bee (*Bombus crotchii*); the State species of special concern American badger (*Taxidea taxus*), loggerhead shrike (*Lanius ludovicianus*), coast (also known as Blainville's) horned lizard (*Phrynosoma blainvillii*) and San Joaquin Coachwhip (*Masticophis flagellum ruddocki*); the State special animal San Joaquin pocket mouse (*Perognathus inornatus*); and the State watch list California horned lark (*Eremophila alpestris actia*).

Comment 1: Blunt-nosed Leopard Lizard

Blunt-nosed leopard lizard (BNLL) is a federal and State endangered and fully-protected species. The Project site is within the known geographic range of BNLL, and the species is known to occur less than 1 mile away from the Project site (CNDDDB 2024).

Suitable BNLL habitat includes all areas of grassland and shrub habitat that contain required habitat elements, such as small mammal burrows and open areas for basking. BNLL are also known to utilize open space patches between suitable habitat features including disturbed sites, and unpaved access roadways. Based on aerial imagery and the information provided in the MND, portions of the Project site may contain suitable habitat for BNLL; however, the MND notes that BNLL has a low potential to occur within the Project site, no species-specific surveys were conducted, and no mitigation measures to avoid the take of this species were included in the MND.

As the Project site is within the known geographic range of the species, historical occurrences have been documented within, and in the vicinity of the Project site, CDFW recommends the following:

Recommended Mitigation Measure 1: BNLL Surveys Prior to Construction

CDFW recommends that a qualified biologist conduct protocol surveys in accordance with the "Approved Survey Methodology for the Blunt-nosed Leopard Lizard" (CDFW 2019) survey methodology and that the surveys be conducted during the appropriate survey season immediately prior to construction. This survey protocol, designed to optimize BNLL detectability, reasonably assures CDFW that ground disturbance will not result in take of this fully protected species.

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Recommended Mitigation Measure 2: BNLL Avoidance Buffer

Based on unpublished data from Dr. David Germano documenting that “male BNLL have home ranges up to 52 acres and that female BNLL have home ranges exceeding 98 acres, the known maximum home range sizes observed for the species, the unknown specific footprint of the individual BNLL’s home range relative to where the lizard was observed on the surface, and the unknown location of the lizard underground when construction commences.” Based on this information, CDFW often considers full avoidance of BNLL to include a minimum 395-acre buffer around each BNLL detection, but this buffer varies by the size and type of project-related ground disturbance. This buffer size is further supported by a 2018 study from Tennant, Germano, et al. titled “Investigating blunt-nosed leopard lizard population size, demographics, space use, and future population trends on Department Ecological Reserves” (Tennant 2018). Among other findings, this study recorded female BNLL in competitive areas dispersing over a kilometer before returning back to their home range. One surveyed female BNLL individual was identified 1.34 kilometers from the original detection point (Tennant 2018).

Based on the linear footprint of the proposed pipeline for this Project, CDFW recommends that any BNLL detection, known or potentially occupied burrows, or egg clutch sites have a minimum 50-foot avoidance buffer. Additionally, if BNLL, known or occupied burrows, or egg clutch sites are detected, CDFW recommends that an appropriate number of qualified biologists be present during all ground disturbing Project activities, including ingress and egress to the Project sites, to ensure that BNLL above ground are not impacted; and that any BNLL individual that may enter an area of Project activity be allowed to leave unobstructed on its own. Given the size of the 395-acre buffer recommendation outlined above relative to the overall size of the proposed Project’s collection reservoir, CDFW recommends the following if Project activities are anticipated to occur within or near occupied BNLL habitat:

Recommended Mitigation Measure 3: BNLL Consultation

With the passage of Senate Bill (SB) No. 147, the incidental take of BNLL may be authorized for certain categories of projects. If BNLL protocol surveys find that the Project site is occupied, or the Project chooses to assume presence for BNLL, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081 subdivision (b) if the Project type meets a qualifying category of SB No. 147.

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Comment 2: San Joaquin Kit Fox

The MND notes that San Joaquin Kit Fox (SJKF) have a moderate potential to occur on the proposed Project site. Mitigation Measures BIO-5 and BIO-8 are provided to mitigate for impacts to SJKF. Mitigation Measure BIO-5 on page 33, states that “No more than 30 days and no less than 14 days prior to initial ground disturbance, pre-construction surveys would be conducted in areas of suitable habitat for San Joaquin kit fox. Surveys need not be conducted for the entire project at one time; they may be phased so that surveys target the specific area to be disturbed. If no potential San Joaquin kit fox dens are present, no further mitigation is required. If potential dens are observed, and the qualified biologist determines they are inactive, they would be avoided in accordance with measure BIO-8. Alternatively, potential dens could be hand-excavated following USFWS standardized recommendations for the protection of the San Joaquin kit fox prior to or during ground disturbance (USFWS 2011) to prevent foxes from re-use during construction.” CDFW concurs with conducting surveys for SJKF and recommends that these surveys be conducted prior to the issuance of any grading permits or the start of ground disturbance. However, CDFW recommends that Mitigation Measure BIO-8 be modified to state that CDFW and USFWS be consulted if SJKF dens are documented during construction or surveys. Additionally, CDFW recommends the following:

Recommended Mitigation Measure 4: SJKF Take Authorization

If the no-disturbance buffers outlined in the in the USFWS’ “Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance” (2011) (USFWS Protocol) protocol for SJKF is not feasible, CDFW recommends that consultation with CDFW occur to discuss how to implement the Project and avoid take. If take cannot be avoided, CDFW recommends the Project proponent pursue take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) to comply with CESA.

Comment 3: Burrowing Owl

The California Fish and Game Commission (FGC) approved burrowing owl (BUOW) as a candidate for potential listing as a protected species under CESA on October 10, 2024, and published these findings in the California Regulatory Notice Register (Notice Register) on October 25, 2024. As such, BUOW is now considered a candidate under CESA and receives the same legal protection afforded to an endangered or threatened species (Fish & G. Code, §§ 2074.2 & 2085).

The MND includes Mitigation Measures BIO-3 and BIO-4 to mitigate for potential impacts to BUOW as the Project site is within the known geographic range of burrowing owl (BUOW) and there are multiple historic and recent occurrences located within five

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miles of the Project site (CDFW 2024). As BUOW is now a candidate under CESA, CDFW recommends that CWD's mitigation measures be updated to reflect the candidacy and recommends the following measures be incorporated into the Project to avoid unauthorized take.

Recommended Mitigation Measure 5: BUOW Surveys Prior to Construction

CDFW recommends that surveys, following the "Burrowing Owl Survey Protocol and Mitigation Guidelines" (CBOC 1993) and CDFW's "Staff Report on Burrowing Owl Mitigation" (CDFG 2012) be conducted within areas of suitable habitat the survey season immediately prior to construction.

Recommended Mitigation Measure 6: BUOW Consultation

If BUOW or burrows known to be currently or previously occupied by BUOW are found, either during surveys or Project activities, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081 subdivision (b).

Comment 4: Crotch's Bumble Bee

The MND notes that suitable habitat for Crotch's Bumble Bee (CBB) is not present within the Project site and no mitigation measures are proposed to mitigate for potential impacts to this species. CDFW does not concur that suitable habitat is absent from the Project site. Based on a review of the MND and aerial imagery, there appears to be several plant species that serve as a food source for CBB and have the potential to occur within the Project site. Additionally, the Project site is within the known geographic range of CBB and there are at least two historical observations within five (5) miles of the Project site (CDFW 2024), in addition to several records within the Project vicinity. CBB are known to inhabit areas of grasslands and scrub that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses, and these habitat elements appear to be present within the Project site. Based on these considerations, CDFW recommends the following:

Recommended Mitigation Measure 7: CBB Surveys Prior to Construction

CDFW recommends that a qualified biologist conduct focused surveys for CBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

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Recommended Mitigation Measure 8: CBB Avoidance Buffer

If CBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 9: CBB Take Authorization

If take cannot be avoided, CDFW recommends acquiring an ITP pursuant to Fish and Game Code Section 2081(b), prior to initiating ground-disturbing activities.

Comment 5: Other State Special-Status Animals

The MND notes the detection of loggerhead shrike and visual observation of San Joaquin coachwhip within the Project vicinity but does not list specific mitigation measures to avoid take of the species. Additionally, California horned lark and San Joaquin pocket mouse are listed with a moderate potential for occurrence with no species-specific mitigation measures included. Further, the grassland habitat may potentially support coast (also known as Blainville's) horned lizard as the Project site is within the species' range. The moderate potential for San Joaquin pocket mouse and other prey resources, and multitude of burrows noted in the photographs taken during the field surveys indicate that American badger may potentially prey on inhabitants of the burrows and utilize the drier open areas of shrublands to dig burrows. CDFW concurs with Mitigation Measures BIO-6 and BIO-7 as methods to minimize potential impacts to these species, but also recommends the following:

Recommended Mitigation Measure 10: Surveys

CDFW recommends that a qualified biologist conduct focused surveys for the special-status species referenced above, as well as their requisite habitat features, to evaluate potential impacts resulting from ground disturbance.

Recommended Mitigation Measure 11: Avoidance

Avoidance whenever possible is encouraged via delineation and a 50-foot no-disturbance buffer around burrows. CDFW also advises that any individuals observed be allowed to leave the Project site of their own volition.

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Comment 6: Permanent Exclusion Fencing

Mitigation Measure BIO-10 provides wildlife protective measures that will be implemented during construction and decommissioning of the Project, including exclusion fencing that would be removed once active construction and decommissioning disturbance activities are complete. CDFW concurs with the proposal to install exclusion fencing to help avoid and minimize the potential for entrapment for special-status species such as SJKF and BNLL, though CDFW recommends the exclusion fence remain in place around the reservoir and be maintained for the life of the Project. As noted on page 4-21 of the MND, "Overall, the areas surrounding the Project create a large open corridor for wildlife movement with the exception of the agricultural fields to the west", which adds support to the possibility that terrestrial animals may view, and be attracted to, the newly-created reservoir. CDFW is available to discuss the recommendation for permanent exclusion fencing around the reservoir along with appropriate fencing design or absent fencing, to discuss specific recommendations to ensure the reservoir design mitigates the risk of entrapment of wildlife (e.g. appropriate slope, textured slopes, escape ramps or floats, wildlife friendly designs, etc.).

Editorial Comments and/or Suggestions

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

Nesting birds: CDFW encourages that Project ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), 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.

CDFW further recommends that a qualified biologist conduct a pre-construction survey 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, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment

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could also affect nests. CDFW recommends that a qualified biologist 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 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 the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Lake and Streambed Alteration: The MND notes existing streams on the Project site and these aquatic features are likely subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 et seq. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake 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 and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website (<https://wildlife.ca.gov/Conservation/LSA>) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

California Natural Diversity Database (CNDDDB)

Please note that the CNDDDB is populated by records through voluntary submissions of species detections. As a result, species may be present in locations not depicted in the

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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 biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site.

ENVIRONMENTAL DATA

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

FILING FEES

The Project, as proposed, could have an impact on biological resources, an 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).

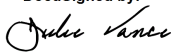
CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist CWD in identifying and mitigating Project impacts on biological resources. A Mitigation Monitoring and Reporting Program (Attachment 1) is included below to assist CWD with incorporating the recommended mitigation measures provided above.

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 regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov.

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Sincerely,

DocuSigned by:

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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: Cawelo Collection Basin and Pipeline Project (Project)
Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2024090952**

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
BNLL	
Recommended Mitigation Measure 1: BNLL Surveys Prior to Construction	
Recommended Mitigation Measure 3: BNLL Consultation	
SJKF	
Recommended Mitigation Measure 4: SJKF Take Authorization	
BUOW	
Recommended Mitigation Measure 5: BUOW Surveys Prior to Construction	
Recommended Mitigation Measure 6: BUOW Consultation	
CBB	
Recommended Mitigation Measure 7: CBB Surveys Prior to Construction	
Recommended Mitigation Measure 9: CBB Take Authorization	
Other State Species of Special Concern	
Recommended Mitigation Measure 10: Surveys	
<i>During Construction</i>	
BNLL	
Recommended Mitigation Measure 2: BNLL Avoidance Buffer	
CBB	
Recommended Mitigation Measure 8: CBB Avoidance Buffer	
Other State Species of Special Concern	
Recommended Mitigation Measure 11: Avoidance	