



STATE OF CALIFORNIA • NATURAL RESOURCES AGENCY Gavin Newsom, Governor  
DEPARTMENT OF FISH AND WILDLIFE Charlton H. Bonham, Director

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July 14, 2023

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**Subject: Prospectus Not Complete for Rancho Dos Hermanas Mitigation Bank Tracking Number 1798-2022-01-R5**

Dear Laura and Tina:

The California Department of Fish and Wildlife (CDFW) has completed its review of your prospectus, dated April 2023, for the Rancho Dos Hermanas Mitigation Bank (Bank). CDFW has determined that the prospectus received on April 17, 2023 and fee received April 21, 2023, is not complete because the information listed below is either missing or insufficient. To complete your prospectus, please provide the following information to CDFW.

**Section 1.2 – Bank Contacts:** According to the Preliminary Title Report (PTR) provided as part of this prospectus submittal, there are three property owners. Contact information for only one was included in the prospectus. Even if the contact information is the same, each property owner needs to be identified. Provide the names, addresses, email addresses, telephone numbers, and fax numbers (if applicable) for each of the other two property owners.

**Section 3.0 Location Maps and Aerial Photos:** The first paragraph of this section describes the property totaling approximately 450 acres including approximately 45 acres of upland orchards, which are to be excluded from the Bank. That would mean the Bank is 405 acres. However, Section 11.0 describes the Bank as being 400 acres that will be protected with a conservation

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easement. Ensure the Bank size is consistent throughout the prospectus documentation.

Page 9 refers to Figure 2 for the Assessor's Parcel Maps; however, the parcels are not delineated on Figure 2, but Figure 5.

Page 9 refers to illegal off-highway vehicle activity within the Santa Clara River. Exception no. 16, 17, and 18 in the PTR allows recreational use by the public in and under the Santa Clara River, including public right of access to the water. Explain how the Bank's resources are able to be adequately protected when the public has the right to use the river for recreational activity. Include a map showing the known public access areas on or near the Bank.

The second to last paragraph on page 9 mentions an existing floodplain easement that abuts the Bank to the south. The floodplain easement actually encompasses a portion of the Bank. This should be noted here with reference to subsequent sections of the prospectus where it is further discussed.

**Section 4.1 – Bank Establishment and Operation:** Page 11 indicates the Bank will be established in phases. It appears to CDFW that the term “phases” is referring to Construction Phases as opposed to Subsequent Phases as defined in the BEI. If our assumption is correct, all information required of a Bank needs to be included for each phase in all bank documentation provided to the IRT. Include a description of the phases, the size of each phase, establishment activities being completed within each phase, credit types and numbers anticipated for each phase, and maps depicting phase boundaries, credit types, and acreages.

The last sentence of Section 4.1 states that other mitigation activities may be proposed during finalization of the BEI to support uplift of onsite resources. While CDFW believes you meant to say establishment activities as opposed to mitigation activities, it does bring up an item for discussion. Any impacts from the construction activities being proposed for the Bank may be required to be mitigated for through various agencies permits or other entitlement processes and should be taken into consideration during bank feasibility analyses.

**Section 5.4.1 – Least Bell's Vireo, Southwestern Willow Flycatcher, Western Yellow-Billed Cuckoo:** Provide a map depicting known least Bell's vireo nesting

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territories, which will help with determining impacts, crediting, and performance standards.

**Section 5.4.2 – Western Pond Turtle:** Provide a description of how the existing ponded areas used by western pond turtle will be impacted with the changes in topography and hydrology associated with the removal of a portion or all of the berm and reconnection of the Santa Clara River to its former floodplains, the current watercress beds.

**Section 5.4.3 – CEQA:** It is unclear from this section what CEQA credits are being requested. The first sentence includes coast horned lizard, western pond turtle, and monarch butterfly, and sensitive habitats, such as Goldenaster Patches and California Walnut Groves. The second sentence describes habitat types of mixed chaparral, annual grasslands, and valley foothill riparian habitats in relation to habitat types found in the watershed. Then, Figure 7 describes the CEQA credits as annual grasslands, desert wash, fresh emergent wetland, lacustrine, and valley foothill riparian habitats. Ensure the credit types being proposed are justified, vegetation communities are mapped and acreages provided, and credit type terms are consistently used throughout the prospectus documents.

**Section 6.4 – Aquatic Resources:** This section describes the existing limits of waters of the U.S. and waters of the State. These are terms that are used by the USACE and State and Regional WQCBs, respectively. For CDFW, Fish and Game Code section 1600 et seq. only refers to streams or lakes. While it is CDFW's understanding that 1600 credits are being requested for approval, Table 4 does not appear to address these. A stream delineation for CDFW 1600 credits needs to be conducted and included to determine the extent of the stream features on the Bank property to document baseline conditions. Please note that uplands or upland buffers are not credit types CDFW recognizes or would require for mitigation in its lake or streambed alteration agreements, unless they are connected hydrologically to the stream as part of the associated riparian vegetation. Provide the anticipated credits generated at each enhancement and rehabilitation area.

**Section 6.5.2 – Vegetation Mapping:** This section indicates that the citrus and avocado groves are not part of the Bank and are therefore excluded from the vegetation communities Table (Table 5). According to the site maps, the orchards are included in the Bank boundary. If they are not part of the Bank, the

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orchards will need to be removed from the Bank boundary. If your intent is to include the orchards in the Bank boundary as mapped, then indicate that the orchard acreage will not be included in crediting calculations. Ensure this is clearly stated in the crediting section of the prospectus (Sections 4.0 and 8.0).

Update Table 4 to include a column for anticipated credit types after construction activities are completed so the IRT can evaluate the differences.

**Section 6.5.2.2 – Non-Native Vegetation Types:** Removal of non-native species can result in impacts to sensitive species, including nesting least Bell's vireo. If take of listed species is anticipated during Bank construction or management activities, consultation with the USFWS and CDFW would be warranted to obtain take authorization prior to conducting such activities.

Agricultural lands are described as occurring along the southeastern boundary of the Bank. These lands need to be mapped and described as either remaining in agriculture and removed from the Bank boundary, identified as acreage not receiving credits, or described as part of enhancement, rehabilitation, or establishment activities.

**Section 6.7.3 – Least Bell's Vireo:** This section describes 8 vireo territories being identified during species surveys conducted in 2021 (Appendix G) based on observations of territorial behavior, nesting, and travelling as family groups. However, the survey report maps 8 distinct locations where these activities were observed. It does not appear that territory ranges were determined. If that information was collected, it will need to be included in the prospectus along with a map of the determined territories to obtain acreage that can be used for crediting purposes. If this site-specific information is not available, then study results from other areas with similar habitat types may be averaged and used to determine acreage and crediting. Section 8 includes vireo in the discussion for covered habitat, so it is unclear to the Department whether you are looking for vireo species credits that can be used to fulfill mitigation in compliance with the California Endangered Species Act (CESA) or just habitat community types used by vireo. Proposed credit types and quantities need to be clearly identified in the prospectus.

**Section 6.7.4 – Southwestern Willow Flycatcher and Yellow-Billed Cuckoo:**

Suitable habitat for southwestern willow flycatcher and yellow-billed cuckoo was identified on the Bank. Species-specific surveys were conducted in April through

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August, 2021. Ten individuals of southwestern willow flycatcher and one individual yellow-billed cuckoo were observed and determined to be migrants based on the time of year of the sightings and the individuals' behaviors. It is not clear to CDFW if you are requesting southwestern willow flycatcher and yellow-billed cuckoo species credits that can be used to fulfill mitigation in compliance with the California Endangered Species Act (CESA) or just habitat community types used by the species. Since these two species currently do not nest within or even adjacent to the Bank, you should propose appropriate performance standards that must be met once development of the Bank occurs. Proposed credit types and quantities and initial performance standards need to be clearly identified in the prospectus.

**Section 6.7.5 – Western Pond Turtle:** Surveys conducted at the Bank in June of 2021 resulted in the capture of 42 individual western pond turtles, including nine juveniles and 4 gravid females. Traps were set along Sespe Creek where several large deep pools continued to hold water and at a reservoir used to store water for agricultural uses. Twenty-four individuals were captured along Sespe Creek and the other 18 individuals were captured in the agricultural reservoir. The prospectus does not discuss potential impacts to western pond turtles as a result of development of the Bank within Sespe Creek or reconnection of the watercress beds with the Santa Clara River, which could eliminate the reservoir. If you are requesting credits for this species, provide the discussed information so that an appropriate number of credits can be justified and proposed in the prospectus.

**Section 6.7.6 – Sensitive Fish Species:** Aquatic surveys were conducted for southern California steelhead, Santa Ana sucker, and unarmored threespine stickleback on November 2, 2022. No fishes were detected due to a lack of water in the Santa Clara River and water carrying large amounts of fine and clay sediment in Sespe Creek, which rendered visual surveys impossible. A second visit to Sespe Creek found it dry.

Based on the analysis in Section 8, it does not appear as though fish credits are being requested at this time. CDFW is open to exploring the potential for southern California steelhead migration habitat credits for Sespe Creek based on the limited usability during above average water years. If that were of interest to you, the prospectus would need to include a crediting proposal, enhancement efforts, and at the BEI stage, include monitoring and

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management actions for southern California steelhead. Please contact CDFW if you would like to discuss this matter further.

**Section 8.2 – Summary of Bank Activities:** This section provides a list of defined terms for generated credit types. The first paragraph following the defined terms states that the primary activity to generate resource credits will be restoration of natural flows of the Santa Clara River and Sespe Creek. Restoration is not one of the defined terms above and should not be used in the bank documents unless it too is defined. Either add “restoration” to the list of defined terms or rename this term where appropriate throughout the prospectus.

Each construction phase needs to be delineated on a map. Development activities that will be conducted within each phase need to be described in the prospectus along with the credit types and quantities anticipated to occur in each phase. This section states that the first phase would focus on invasive removal. Please be aware that depending on the density of Arundo and tamarisk, removal of these invasive plant species may create preservation credits or enhancement credits only. Rehabilitation would require uplift in multiple functions and would likely require the planting of appropriate native vegetation with performance standards to measure success.

**Section 8.3.3 – Riverine Mosaic Enhancement/Preservation Credits:** This section describes the different vegetation communities and areas for which you are seeking credits. One is 39 acres and the other is 155 acres for a total of 195 acres. The numbers are off by one. Remap and recalculate to determine the actual acres to be included in the enhancement area or further evaluation area and be sure the corrected numbers are consistent throughout the Prospective documents.

**Section 8.4 – Habitat Credits:** Definitions included in the prospectus do not include restoration. As mentioned above, either define restoration or remove reference to restoration throughout the Prospective documents.

**Section 8.4.2 – Western Pond Turtle:** The term “restoration” needs to be addressed throughout the document. Provide a crediting methodology for this species. This section identifies 57 acres available for western pond turtle crediting, but it is not clear what this is based on (e.g., perennial pond acreage, surrounding upland nesting habitat, or a combination of both).

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As described previously, if the agricultural pond and watercress beds where turtles are currently located will be removed or otherwise altered such that these areas no longer pond water perennially, those areas should be removed from the crediting acreage.

**Section 9.0 – Bank Operation:** Public, guided, educational tours are being proposed within designated areas of the Bank. Provide a map showing the designated areas for public tours. If these are part of the Bank activities, they must be described in the management plans and funded during the BEI stage.

**Section 10.2 – Mineral Rights:** The portion of the Bank with severed mineral rights needs to be included on the Plotted Easements map in the PAW. Per the Remoteness Opinion, two oil and gas wells were drilled within the Bank boundary. An unspecified acreage in the northwestern portion of the Bank is included in the Fillmore Field. Discussion of the onsite wells and the inclusion of a portion of the Bank in a known oil field should be included in this section of the prospectus.

**Section 11.0 – Perpetual Protection:** This section states that the CE will be recorded over approximately 400 acres of the proposed Bank property. The CE will be recorded over the entirety of the parcels of which the Bank is a part but will only affect the areas covered by the Bank. This is why the legal description of the Bank property is very important and is required to be provided and stamped by a California licensed surveyor. It is unclear at this point whether the legal description provided in the PTR is a description of the entire parcels or limited to the Bank.

Additionally, Section 3.0 indicates that the property is 450 acres including 45 acres of orchard, which will continue to be cultivated and will not be a part of the creditable area of the Bank. The 450 acres differs from the 400 acres described in this section and differs from the vegetation communities total of 399.48 acres included in Table 5. None of these numbers seem to account for the existing easements that should be removed from the creditable area of the Bank. Once the correct acreages for the Bank property and the creditable area are determined, ensure that those numbers are consistently used throughout the banking documents.

**Section 12.0 – Lands Not Appropriate for Banking:** Two of the conditions included in the prospectus submittal checklist were not included in this section; land already designated or dedicated for park or open space use, where that use is

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generally compatible with sustaining biological values and land with existing easements that are incompatible with the purposes of the Bank. Either include these two conditions to the list in this Section if they do not apply, or if they do, which they appear to, then provide an explanation sufficient to allow the IRT to determine if crediting would be appropriate in those locations.

**Appendix L – Preliminary Title Report:** The Assessor's Parcel Numbers (APNs) contained in the report do not match what is presented in Figure 5. The APNs provided by the County Assessor's Office, which should be the same as those found in the PTR, should be used consistently throughout the prospectus and all other banking documents.

**Figure 2:** Add the acreages in the legend box for the Bank Site and Not A Part area.

**Service Area maps:** Provide the ecological basis for each species and provide species range maps showing both historic and contemporary extent, if available. Also provide a map showing the least Bell's vireo territories based on the presumed nesting locations identified in the species survey report along with each determined territory size.

**Water rights:** Provide a discussion of existing water rights, including any documentation of such, and the existing hydrologic regime of the river.

**Functions and services of aquatic resources:** Provide a description of the current functions and services of aquatic resources and those resources necessary to maintain the species for which credits are being requested.

*The following items do not affect the complete determination for the prospectus, but they should be addressed to better inform the Department during its prospectus acceptability stage of review.*

**Section 1.3 – Qualifications of the Bank Sponsor:** This section describes using the Bank for educational purposes. Provide a description of what would be undertaken to promote education at the Bank. Describe how the Bank would be used for such educational purposes in enough detail that the IRT can understand if/how those activities may affect the conservation values of the Bank that may impact crediting.

This section also describes the need for restoration and rehabilitation of the bank habitat. Include specific actions necessary for restoration and rehabilitation, a



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description of how those actions will provide the necessary uplift for restoration and rehabilitation, maps delineating the different restoration and rehabilitation Bank boundary should be adjusted around those areas.

**Section 2.0 – Bank Purpose and Need:** Describes habitat uplift activities as removal of large stands of giant reed. Depending on the size and density of the stands in relation to other bank habitat and other work being conducted to actively improve habitat, this uplift activity could be classified as enhancement or rehabilitation as defined in the prospectus.

Additionally, please be aware that least Bell's vireo can be found within habitats containing various densities of giant reed and tamarisk. Least Bell's vireo is a listed species under both the California Endangered Species Act and the Federal Endangered Species Act. If take of the species is anticipated during giant reed or tamarisk removal or other construction-related activities, consultation with the United States Fish and Wildlife Service (USFWS) and CDFW would be warranted to obtain take authorization before removal activities begin.

**Section 3.0 – Location Maps and Aerial Photos:** A legal description of the 45-acre orchard will need to be prepared by a licensed surveyor and included in the BEI and all mapping, as appropriate. This is also true for any easements or other encumbrances that will be removed from crediting.

**Section 4.0 – Crediting:** This section describes credits for 404, 401, Porter Cologne, and 1600 impacts. This would require that each agency with jurisdiction over these credit types (United States Army Corps of Engineers, United States Environmental Protection Agency, Regional Water Quality Control Board, and California Department of Fish and Wildlife, respectively) sign the BEI. If any agency was unable or unwilling to sign the BEI, the corresponding credit types would need to be removed from the prospectus documents.

#### **Section 4.1 – Bank Establishment and Operation:**

Item 1: The Conservation Easement will show up on title for the parcels as an encumbrance but will only affect the land within the Bank boundary. This is why it is important to have a California licensed surveyor prepare and stamp the legal description of the Bank boundary during the BEI stage.

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Item 1 and Item 2: The Conservation Easement holder, the endowment holder, and the long-term land manager will need to undergo CDFW's due diligence process to obtain CDFW approval prior to engaging each.

**Section 7 – Regional Context:** The second paragraph explains how watercress cultivation is compatible with a mitigation bank. CDFW does not consider watercress cultivation or other agricultural activities to be a compatible activity and would not assign credits to any areas of the Bank in active cultivation or anticipated future cultivation.

**Section 8.1 – Bank Objectives:** Each entity with jurisdiction over the use of the proposed credit types must be a signatory to the BEI. Based on the list of proposed credit types, that would include the United States Army Corps of Engineers, the United States Environmental Protection Agency, the Regional Water Quality Control Board, CDFW, and the United States Fish and Wildlife Service. Other agencies cannot authorize the release and use of credit types outside their jurisdiction.

CDFW agrees that the Bank has the potential for 1600 stream, least Bell's vireo, white rabbit tobacco, western pond turtle, Goldenaster Patches and California Walnut Groves credit types as well as southwestern willow flycatcher and yellow-billed cuckoo habitat for CEQA purposes. As stated above, CDFW is open to evaluating the potential for southern California steelhead migratory habit.

**Section 8.3.1 – Riverine Mosaic Re-Establishment Credits:** There is not a commitment to monitor for hydrological connectivity or to plant native plant species appropriate for riverine systems after the berms are removed from the northern portion of the Bank proposed for re-establishment credits. If you are relying on passive regeneration of vegetation with no performance standards related to vegetation recovery or documentation of hydrologic reconnection of the area to Sespe Creek, CDFW would likely not concur that re-establishment credits are warranted in the northern area.

To obtain re-establishment credits for the watercress beds, CDFW recommends removal of the entire length of the berm separating the watercress beds from the Santa Clara River. Native plant installation is planned for at least portions of the watercress bed area. Performance Standards are necessary to ensure success of the planting and to show anticipated functional uplift in this area. Areas that will or will not be planted with native plant species will need to be further identified in the development plan during the BEI stage. The acreage for

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this credit type will likely need to be adjusted based on existing easements within each construction phase.

**Section 8.3.2 – Riverine Mosaic Rehabilitation Credits:** Areas of eucalyptus are going to be evaluated for raptor and monarch use before deciding if the trees will be removed and replaced with sycamore and cottonwood. CDFW would like to point out that cottonwood trees consume much more water than eucalyptus and that should be part of your consideration for replacement of the relatively low water requiring eucalyptus. The difference in water use should also be included in your functional lift evaluation, which currently includes reduced water consumption.

**Section 8.4.1 – Least Bell's Vireo, Southwestern Willow Flycatcher, and Yellow-Billed Cuckoo Habitat Credits:** Least Bell's vireo have been identified nesting on the Bank property. The survey report identified 8 territories, but a territory size was not provided. It is not clear to CDFW whether the report was actually referring to nesting sites or some other species observation. As described above, CDFW needs the actual territory sizes to be determined or territory averages from other research efforts where birds were found using similar vegetation communities used to determine the number of credits available. The Development Plan will need to include this information and a description of construction related impacts to the species from removal of vegetative structure and replacement with immature native vegetation, disturbance from additional construction noise, ground disturbance, and increased human presence, and avoidance, minimization, and mitigation measures that will be undertaken.

Migrant willow flycatcher and yellow-billed cuckoo were identified during 2021 surveys. Because no breeding is occurring on the Bank to help sustain the population, CESA credits cannot be assigned for willow flycatcher. Species migratory habitat under CEQA would be more appropriate. The BEI could be written in such a way to address future occupancy by willow flycatcher after development of the Bank. Additional information would be required in the BEI such as a crediting methodology and performance standards (e.g., documentation of nesting) that must be met prior to release of such credits.

**Section 8.4.3 – Sensitive Habitats and Rare Plants:** It is not clear to CDFW whether the Goldenaster Patches or California Walnut Grove credits overlap with other crediting types. Ensure this is clear in the credit evaluation and credit ledger if moving forward to the BEI stage.

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**Section 8.4.4 – Additional Species:** If you are able to document a robust population of coast horned lizard or monarch butterfly and would like to add credits for these species during the BEI stage, CDFW recommends including them as credits types along with the crediting methodology and performance standards in the first draft submittal; otherwise, an unsolicited change fee or amendment fee would be required after a complete/incomplete determination has been made or after BEI approval, respectively.

**Section 8.5 – Methods, Monitoring and Performance Standards:** Performance standards are described as conforming to industry standards, but habitat specific and species-specific performance standards will need to be developed based on the unique resources anticipated to occur on the Bank post development.

Arundo and tamarisk control is identified earlier in the prospectus as being eradicated. The specific areas this is being proposed need to be included on a map with the aim of zero percent cover with smaller infestation being addressed on an annual basis and more intensive control needed after stream/vegetation altering precipitation events.

**Section 8.6 – Long-Term Management, Sustainability, and Climate Change:** CDFW would like to bring to your attention that during the interim management period, the Bank Sponsor is responsible for all monitoring and management of the Bank until which time endowment amount is fully funded for at least 3 years and all performance standards have been met to the satisfaction of the IRT.

**Section 9.0 – Bank Operation:** All three security types, construction, performance, and interim management, are appropriate for this Bank.

**Section 10.1 – Existing Easements and Encumbrances:** Our land agents will need to review the PTR and the Property Assessment and Warranty (PAW) documents to determine if CDFW agrees with the assessment that only two exceptions have the potential to impact the conservation values of the Bank, which you indicated will be removed from the title report. CDFW recommends that all title exceptions that no longer apply be removed prior to the submittal of the BEI and that the BEI be submitted with an updated PTR evidencing the removal of the two exceptions.

One of the exceptions that you will be trying to remove from title is The Nature Conservancy's (TNC's) conservation easement (CE) that extends into the

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southern portion of the Bank. Because the CE was acquired using public funds, this may be a difficult thing to accomplish since TNC would have used public funds that did not go toward its intended purpose. CDFW recommends removing the TNC easement from the Bank or at least identifying the area as a non-creditable area.

A California licensed surveyor should be mapping and providing the acreage of each exception and encumbrance that is able to be mapped if the exception or encumbrance will be either removed from the Bank boundaries or removed from crediting. If an exception or encumbrance covers the entire bank or an entire parcel(s), then state that and show which parcel on the Plotted Easements map.

**Section 10.3 – Water Rights:** Our right of way agents, and potentially others, will need to review the PTR and the PAW documents to determine if CDFW agrees with the assessment that no existing water rights would affect the conservation values of the Bank.

**Appendix R – Business Entity Verifications and Authorizations:** Our right of way agents will need to review the business verification documentation before CDFW can deem the prospectus acceptable. At the very least the member consent document should allow the establishment and operation of a mitigation bank.

*The following comments concern the Bank Enabling Instrument (BEI) should we get to that stage of the banking process and you choose to proceed.*

**Section 6.2 – Site History and Surrounding Land Uses:** The last paragraph describes an existing floodplain conservation easement that overlaps with a small portion of the Bank property. It also indicates that you will be requesting that the easement be removed from the Bank property. CDFW requests that this issue be resolved prior to submittal of the BEI. If the easement cannot or will not be modified, then that area must either be removed from the Bank boundaries or removed from crediting calculations.

**Appendix E – Rare Plant Surveys:** California Rare Plant Ranked plants, spiny rush (*Juncus acutus* ssp. *leopoldii*), bush lupin (*Lupinus* sp.), and white rabbit tobacco (*Pseudognaphalium leucocephalum*), were identified in a number of locations throughout the Bank. These plants need to be addressed in the development plan and management plans submitted as part of the BEI along with

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identification of appropriate avoidance, minimization, and mitigation measures. CDFW recommends avoidance with at least a 25-foot no disturbance buffer where feasible and where avoidance is not feasible, minimize impacts by implementing a plant salvage and relocation plan that includes a success monitoring period. CDFW recommends at least 5 years of post-salvage monitoring, with success criteria being met for at least two years after supplemental watering has ceased. Considering the local status of these three sensitive plant species, CDFW recommends developing a mitigation strategy to adequately offset Bank development impacts during the BEI stage.

**Appendix F – Wildlife Species List:** A number of state species of special concern and species listed as fully protected were identified on the Bank property. These species need to be addressed in the development plan and management plans submitted as part of the BEI along with identification of appropriate avoidance, minimization, and mitigation measures. Senate Bill 147 recently passed, which allows CDFW to permit take of species formerly identified as fully protected in Per Fish and Game Code Section 4700 for certain types of projects. Development of the Bank is not one of those identified projects that may be permitted for incidental take; therefore, avoidance of fully protected species during Bank development and management is warranted.


**Appendix L – Preliminary Title Report:** There are numerous exceptions identified by the PTR, which will need to be included and explained in a PAW, which will be submitted as part of the BEI. Please be aware that there is a new PAW guidance document available on our website at [Conservation and Mitigation Banking Instructions and Templates \(ca.gov\)](https://www.wildlife.ca.gov/Conservation/Mitigation/Banking/Instructions%20and%20Templates).

The prospectus may be made complete with the submission of the above (first 26 bolded items) information or documents. The Department will have 30 days to review the resubmitted prospectus to determine if it is complete. The Department will provide you written notification of its determination, which is distinct from any determination by another signatory agency.

For further assistance on the banking process please visit the Department's web site at <https://www.wildlife.ca.gov/Conservation/Planning/Banking>. If you have questions regarding this letter or the bank review process, please contact Lisa Gymer, Senior Environmental Scientist (Specialist), at [Lisa.Gymer@wildlife.ca.gov](mailto:Lisa.Gymer@wildlife.ca.gov) or (858) 294-8074.

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Sincerely,

DocuSigned by:  
  
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