



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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Governor's Office of Planning & Research

November 23, 2020

Nov 23 2020

STATE CLEARINGHOUSE

Jamie Bax, Deputy Director of Community and Economic Development - Planning
Madera County Community and Economic Development
200 West 4th Street, Suite 3100
Madera, California 93637

Subject: The Lodge at Yosemite South (Project)
Notice of Preparation (NOP)
SCH No.: 2020100390

Dear Ms. Bax:

The California Department of Fish and Wildlife (CDFW) received a NOP for a draft Environmental Impact Report from Madera County for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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

CDFW has previously commented on a Mitigated Negative Declaration (i.e. Sky Ranch Recreational Vehicle Park Facility PRJ No. 2018-005) for this Project. Due to potentially significant impacts as a result of the Project, CDFW agrees with Madera County that an Environmental Impact Report (EIR) is appropriate. CDFW recommends our comments below be incorporated into the EIR for this Project.

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,

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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subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on Project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

Water Pollution: Pursuant to Fish and Game Code section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into "Waters of the State" any substance or material deleterious to fish, plant life, or bird life, including non-native species. It is possible that without appropriate mitigation measures, implementation of the Project could result in pollution of Waters of the State from storm water runoff or construction-related erosion. Potential impacts to the wildlife resources that utilize these watercourses include the following: increased sediment input from road or structure runoff; toxic runoff associated with development activities and implementation; and/or impairment of wildlife movement along riparian corridors. The Regional Water Quality Control Board and United States Army Corps of Engineers also have jurisdiction regarding discharge and pollution to Waters of the State.

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In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (i.e., CEQA), focusing specifically on Project activities that have the potential to adversely affect fish and wildlife resources. CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

PROJECT DESCRIPTION SUMMARY

Proponent: RTA Sierra Sky Ranch LLC

Objective: The proposed Project would develop a resort-style camping facility on a 38.62-acre site, composed of two adjacent parcels (Assessor's Parcel Numbers 057-180-037 and 057-600-013). The applicant requests a Madera County General Plan Amendment to re-designate the existing Rural Residential (RR) land use designation to Community Commercial (CC) and amend the Oakhurst Area Plan from RR to CC, and issuance of a Conditional Use Permit by the County in accordance with the County zoning for Planned Development District. The proposed Project would provide overnight lodging opportunities including tent camping, recreational vehicle (RV) spaces, cabins, huts, and similar accommodations. Proposed amenities include a check-in office, gift shop/store, lodge, pool, spa, restrooms, clubhouse, food service, walking trails, seating areas, and open space areas. The proposed site plan includes 93 RV sites, 79 cabins/huts, and 35 car camp sites. Visitor occupancy is estimated at an average range of 286 to 340 per day and a maximum range of 520 to 620 per day.

Location: The Project is located on the north side of Road 632, approximately 0.27 mile east of its intersection with Highway 41 (50833 and 50691 Road 632) Oakhurst, California.

Timeframe: Unspecified.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist Madera County 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 document.

CDFW is concerned regarding potential impacts to special-status species including, but not limited to, the State endangered foothill yellow-legged frog (*Rana boylei*), the State threatened and federally proposed endangered Sierra Nevada red fox (*Vulpes vulpes necator*), and special-status plants. In addition, CDFW is concerned regarding potential impacts to Lewis Creek, which may be subject to CDFW's LSA regulatory authority.

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I. Environmental Setting and Related Impact

Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the United States Fish and Wildlife Service (USFWS)?

COMMENT 1: Foothill Yellow-Legged Frog (FYLF)

Issue: FYLF are primarily stream dwelling and requires shallow, flowing water in streams and rivers with at least some cobble-sized substrate (Thomson et al. 2016). FYLF have been documented to occur in the vicinity of the Bass Lake area and may potentially occur in the Project site (CDFW 2020). Lewis Creek flows through the western part of the Project site, and thus the Project site contains stream habitat that may support the species. Avoidance and minimization measures are necessary to reduce impacts to FYLF to a level that is less than significant.

Specific impact: Without appropriate avoidance and minimization measures for FYLF, potentially significant impacts associated with the Project's activities include burrow collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of eggs, larvae and/or young, and direct mortality of individuals.

Evidence impact would be significant: FYLF populations throughout the State have experienced ongoing and drastic declines and many have been extirpated; historically, FYLF occurred in mountain streams from the San Gabriel River in Los Angeles County to southern Oregon west of the Sierra-Cascade crest (Thomson et al. 2016). Habitat loss from growth of cities and suburbs, invasion of nonnative plants, impoundments, water diversions, stream maintenance for flood control, degraded water quality, and introduced predators, such as bullfrogs are the primary threats to FYLF (Thomson et al. 2016). Project activities have the potential to significantly impact the species.

Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to FYLF, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 1: FYLF Surveys

CDFW recommends that a qualified wildlife biologist conduct surveys for FYLF in accordance with the USFWS "Revised Guidance on Site Assessment and Field

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Surveys for the California Red-legged Frog” (USFWS 2005) to determine if FYLF are within or adjacent to the Project site; while this survey is designed for California red-legged frog, the survey may be used for FYLF with focus on stream/river habitat.

Recommended Mitigation Measure 2: FYLF Avoidance

If FYLF are found during pre-construction surveys or at any time during construction, consultation with CDFW is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when FYLF are most likely to be moving through upland areas (November 1 and March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends a qualified biologist monitor construction activity daily for FYLF.

Recommended Mitigation Measure 3: FYLF Take Authorization

If through surveys it is determined that FYLF are occupying or have the potential to occupy the Project site and take cannot be avoided, take authorization would be warranted prior to initiating ground-disturbing activities. Take authorization would occur through issuance of an Incidental Take Permit (ITP) by CDFW, pursuant to Fish and Game Code section 2081 subdivision (b).

COMMENT 2: Sierra Nevada Red Fox (SNRF)

Issue: Review of aerial imagery indicates that the Project site has suitable forested habitat for SNRF containing a mixture of vegetative types, structures and edges. The CNDDDB shows that SNRF are potentially present in the Project site; a 1994 recorded sighting was located at the Highway 41 and Road 632 intersection (CDFW 2020). Den sites for SNRF include natural cavities in talus slopes or rockslides. They may use earthen dens, boulder piles, or even the space beneath vacant cabins (Perrine et al. 2010).

Specific impact: Without appropriate avoidance and minimization measures for SNRF, potential significant impacts associated with the Project include den collapse, inadvertent entrapment, reduced reproductive success, reduction in health and vigor of young, and direct mortality of individuals.

Evidence impact is potentially significant: Habitat loss resulting from urban and industrial development is a threat to SNRF. The Project site is bordered by undeveloped land in the vicinity. Therefore, subsequent ground-disturbing activities have the potential to significantly impact local SNRF populations.

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Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to SNRF, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 4: SNRF Habitat Assessment

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

Recommended Mitigation Measure 5: SNRF Surveys

CDFW recommends assessing presence/absence of SNRF by conducting surveys. CDFW recommends that the protocol in Appendix B of *Ecology of Red Fox (Vulpes vulpes) in the Lassen Peak Region of California, USA* (Perrine, 2005) be followed and that surveys be conducted accordingly and prior to commencing any Project-related activities. If any active or potential dens are found on the Project site during these surveys, consultation with the Department would be warranted for guidance on take avoidance, minimization, and mitigation measures.

Recommended Mitigation Measure 6: SNRF Take Authorization

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

COMMENT 3: Special-Status Plants

Issue: Several special-status plant species have been documented to occur in the vicinity of the Project site including the California Rare Plant Ranked (CRPR) 1B.2 Rawson's flaming trumpet (*Collomia rawoniana*), orange lupine (*Lupinus citrinus*), and Abram's onion (*Allium abramsii*) (CDFW 2020). These species meet the definition of rare or endangered under CEQA Section 15380.

Specific impact: Without appropriate avoidance and minimization measures for special-status plants, potential significant impacts resulting from ground- and vegetation-disturbing activities associated with Project construction include inability to reproduce and direct mortality.

Evidence impact would be significant: Abram's onion and orange lupine require granitic soils in conifer forests and other woodland habitats, while Rawson's flaming

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trumpet requires riparian forest within conifer forest habitats (California Native Plant Society [CNPS] 2020). These species are threatened by residential development, road maintenance, vehicles, foot traffic and trampling, and invasive, non-native plants (CNPS 2020), all of which have the potential to occur through development of the Project.

Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to special-status plant species associated with the Project, CDFW recommends conducting the following evaluation of the Project site, incorporating the following mitigation measures into the EIR prepared for this Project, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 7: Special-Status Plant Habitat Assessment

CDFW recommends that a qualified botanist conduct a habitat assessment in advance of project implementation, to determine if individual Project sites or their immediate vicinity contain suitable habitat for special-status plant species.

Recommended Mitigation Measure 8: Special-Status Plant Surveys

If suitable habitat is present, CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities" (CDFW 2018). This protocol, which is intended to maximize detectability, includes the identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

Recommended Mitigation Measure 9: Special-Status Plant Avoidance

CDFW recommends special-status plant species be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50-feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

Recommended Mitigation Measure 10: State-listed Plant Take Authorization

If a plant species listed pursuant to CESA or the Native Plant Protection Act is identified during botanical surveys, consultation with CDFW is warranted to

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determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground-disturbing activities may be warranted. Take authorization would occur through issuance of an Permit by CDFW applying the set of conditions and procedures set forth in the California Code of Regulations, title 14, section 783 et seq. (Cal. Code Regs., tit. 14, section 786.9).

II. Editorial Comments and/or Suggestions

Lake and Streambed Alteration: The Project is 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; or (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 in nature.

Lewis Creek is located within the western section of the Project site. The Project has the potential to include activities that may be subject to CDFW's LSA regulatory authority. Project activities adjacent to Lewis Creek, including within 100 feet, have the potential to impact downstream waters. Streams function in the collection of water from rainfall, storage of various amounts of water and sediment, discharge of water as runoff and the transport of sediment, and they provide diverse sites and pathways in which chemical reactions take place and provide habitat for fish and wildlife species. Disruption of stream systems such as these on the Project site can have significant physical, biological, and chemical impacts that can extend into the adjacent properties, thereby adversely affecting the flora and fauna in the adjacent habitat.

For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593. It is important to note, CDFW is required to comply with CEQA, as a Responsible Agency, when issuing a Lake or Streambed Alteration Agreement. If inadequate, or no environmental review, has occurred, for the Project activities that are subject to notification under Fish and Game Code 1602, CDFW will not be able to issue the Final LSAA Lake and Streambed Alteration Agreement until CEQA analysis for the project is complete. This may lead to considerable Project delays.

Federally Listed Species: CDFW recommends consulting with the USFWS on potential impacts to federally listed species including, but not limited to SNRF. Take under the federal Endangered Species Act (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/denning. Consultation with the USFWS

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in order to comply with ESA is advised well in advance of any ground-disturbing activities.

Timberland conversion: Based on the project location, it appears the Project may result in the conversion of timberland (as defined by Public Resources Code Section 4526) into non-timberland use. CDFW recommends that the Project proponent consult directly with the California Department of Forestry and Fire Protection (CALFIRE) to determine if a Timberland Conversion Permit, pursuant to California Code of Regulations, Title 14, Section 1100, is required.

Nesting birds: CDFW encourages Project implementation occur during the bird non-nesting season. However, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project's 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 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 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 work site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends that a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

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

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

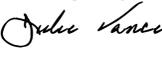
FILING FEES

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CDFW appreciates the opportunity to comment on the Project to assist Madera County in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). If you have any questions, please contact Jim Vang, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 243-4014, extension 254, or by email at Jim.Vang@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...
Julie A. Vance
Regional Manager

Attachment

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cc: RTA Sierra Sky Ranch LLC
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Central Valley Region
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Patricia Cole; Patricia.Cole@fws.gov

California Department of Forestry and Fire Protection:
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REFERENCES

- California Native Plant Society (CNPS), Rare Plant Program. 2020. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org>.
- California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife, March 2018.
- CDFW, 2020. Biogeographic Information and Observation System (BIOS). <https://www.wildlife.ca.gov/Data/BIOS>.
- Perrine, J.D. 2005. Ecology of Red Fox (*Vulpes vulpes*) in the Lassen Peak Region of California, USA. PhD. Dissertation, University of California, Berkeley.
- Perrine, J.D., L.A. Campbell, and G.A. Green, 2010. Sierra Nevada red fox (*Vulpes vulpes nicator*): a conservation assessment. USDA R5-FR-010. 52 pp.
- Thomson, R. C., A. N. Wright, and H. Bradley Shaffer, 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife and University of California Press.
- USFWS. 2005. Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog. March 2005. 26 pp.

Attachment 1

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

PROJECT: The Lodge at Yosemite South

SCH No.: 2020100390

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Mitigation Measure 1: FYLF Surveys	
Mitigation Measure 3: FYLF Take Authorization	
Mitigation Measure 4: SNRF Habitat Assessment	
Mitigation Measure 5: SNRF Surveys	
Mitigation Measure 6: SNRF Take Authorization	
Mitigation Measure 7: Special-Status Plant Habitat Assessment	
Mitigation Measure 8: Special-Status Plant Surveys	
Mitigation Measure 10: State-listed Plant Take Authorization	
<i>During Construction</i>	
Mitigation Measure 2: FYLF Avoidance	
Mitigation Measure 9: Special-Status Plant Avoidance	