Appendix C

Bat Habitat Assessment Memorandum

Memorandum

To: Laura Rodriguez, Eyestone Environmental
From: Jennifer Johnson, GPA Consulting
Date: September 13, 2021
Subject: Bat Habitat Assessment for the Cheval Blanc Beverly Hills Project

INTRODUCTION

The Cheval Blanc Beverly Hills Project (Project) is a new luxury hotel development proposed on a 55,508-square-foot (1.28-acre) site located at 456 and 468 North Rodeo Drive, 461 through 465 North Beverly Drive, and 449, 451, and 453 North Beverly Drive in the Business Triangle of the City of Beverly Hills, California (**Attachment A**, **Figure 1** and **Figure 2**). Based on the Tree Removal and Replacement Technical Memorandum prepared for the Project by Gruen Associates in August 2020, there are 15 street trees that line the sidewalks adjacent to the onsite buildings, including five king palms (*Archontophoenix cunninghamiana*) along North Rodeo Drive, four Mexican fan palms (*Washingtonia robusta*) along South Santa Monica Boulevard, three Mexican fan palms along North Beverly Drive, and three Tipu trees (*Tipu tipuana*) along North Beverly Drive. The trees would be removed as part of the project and replaced at a 1:1 ratio with similar tree species. The Project would add an additional seven trees on the Project site for a total of 22 trees at full buildout.

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the Project and recommended that the DEIR provide a discussion on the potential Project impacts on bats and roosts and provide bat-specific avoidance and/or mitigation measures, as necessary. As part of the Project, bat habitat surveys are required.

SURVEY METHODS

LITERATURE REVIEW

Prior to conducting the daytime bat habitat assessment, a literature review and records search were conducted on April 29, 2021 to identify bat species recorded in and within the vicinity of the project area. State lists of sensitive species were examined and are included in **Attachment B**. This review included conducting a search in the California Natural Diversity Database (CNDDB) for the Beverly Hills United States Geological Service Quadrangle (quad) and surrounding eight quads. Based on the CNDDB database search, seven bat species have been recorded within 10 miles of the project area including the pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), western yellow bat (*Lasiurus xanthinus*), pocketed free-tailed

bat (*Nyctinomops femorosaccus*), and big free-tailed bat (*Nyctinomops macrotis*). One hoary bat occurrence was recorded in 1957 from an unknown location in Beverly Hills mapped in the general vicinity of the Project site. Four silver-haired bats were recorded in 1985 in West Los Angeles, approximately 3.7 miles from the project area. Based on focused nighttime bat surveys performed for the One Beverly Hills Overlay Specific Plan in October 2020 by LSA Associates Inc., three species of bats, including the Yuma myotis (*Myotis yumanensis*), Mexican free-tailed bat (*Tadarida brasiliensis*), and canyon bat (*Parastrellus hesperus*), were detected approximately 0.7 mile west of the Project site (LSA Associates, Inc., 2020).

Survey Area

The project area is located in an urbanized area and is currently developed with commercial and institutional buildings in the City of Beverly Hills. The existing landscaping within the project area is sparse and consists of ornamental shrubs in planters and the 15 trees lining the sidewalks. There are no waterbodies or waterways within one mile of the project area. The survey area included the existing onsite buildings, 15 trees within the project area, and an approximate 60-foot buffer around the project area (**Attachment A**, **Figure 3**).

Survey Dates and Personnel

A daytime bat habitat assessment was conducted on April 29, 2021 between approximately 12:00 PM and 3:30 PM to identify existing roosting habitat in the project area, particularly in the 15 street trees. Daytime bat habitat assessment surveys were conducted by GPA Consulting (GPA) senior biologist Stan C. Glowacki. Mr. Glowacki has over 20 years of experience conducting biological surveys and seven years of experience conducting bat habitat assessments, acoustic bat surveys, and bat monitoring on multiple projects throughout southern California.

Survey Methods

The survey was conducted on foot using unaided vision and binoculars. Mr. Glowacki inspected the 15 street trees and a 60-foot buffer area adjacent to the onsite buildings from the ground to identify suitable bat roosting habitat, including palm fronds and other foliage, crevices, and cavities, and to look for visible signs of bat presence, including guano and staining. Photographs of the survey area are included in **Attachment C**.

The survey was conducted during the bat maternity season (generally April 1 through September 15), when bats are generally easier to detect, in particular maternal colonies. Surveys were conducted during daylight hours during a time when bats are not active. During the survey, the weather was clear with a temperature of 82 degrees and winds of approximately five miles per hour. Bat habitat assessments are performed during the day to understand the site and the potential for bats to be in the area based on habitat conditions. Some species of bats day roost in the foliage of trees while other bat species day roost in crevices or cavities found in mature trees. A night roost, on the other hand, refers to a structure or structural feature, whether natural or human-made, in which bats roost during the evening between foraging bouts (e.g., crevices, cavities, corners, and recessed open spaces that are sheltered from the wind). The bat habitat assessment was performed for the Project under daylight conditions in order to maximize visibility of such habitat features, including crevices, cavities, corners, and recessed open spaces.

Limitations That May Influence Results

The entire project area was accessible during the assessment; however, because the palm trees are tall and surveyed from the ground, not all areas of the palm trees (the crevices and cavities in the palm tree crowns) were visible. Therefore, as provided below in Recommendations, it is recommended that a qualified biologist be retained to survey the palm tree crowns for bats from a man-lift immediately prior to tree removal.

SURVEY RESULTS

No bats or their sign were observed within the 15 trees, below the trees, or within the buffer area during the bat habitat assessment. Suitable bat roosting habitat was observed in the palm trees; including live palm fronds and shallow crevices; however, the habitat was of marginal quality because the palm trees were well trimmed and maintained and existing habitat is exposed. Bats typically roost under hanging/dead palm fronds that provide shelter and cover from predators, which were not present on these trees (see **Attachment C: Photos 1** through **6**). No joints or crevices that bats use as roosting habitat were observed on the onsite buildings. Unmaintained palm trees and other trees with suitable bat roosting habitat were observed one block north of the project area in Beverly Gardens Park on North Santa Monica Boulevard (see **Attachment C: Photos 7** and **8**).

CONCLUSIONS AND RECOMMENDATIONS

Conclusions

Based on the results of the daytime bat habitat assessment and survey there is marginal roosting habitat for bats in the 15 street trees and no suitable habitat in the onsite buildings in the project area.

Recommendations

Although the palm trees do provide bat roosting habitat, the habitat quality is marginal; therefore, the potential for bats to roost in these trees is considered low. In addition, it's possible that bats may only use the palm trees intermittently, and evening emergence acoustic surveys may not be conclusive. To ensure no bats are impacted, it is recommended that trees be removed outside of the maternal season (April 1 through September 15) to prevent potential impacts on maternal bats and their young, should they be present. It is also recommended that the City retain a qualified biologist to survey the palm tree crowns for bats from a man-lift immediately prior to tree removal and have a qualified biologist on site during removal. If bats are detected roosting in any of the palm trees prior to or during removal, the bats must be allowed to leave by their own volition before the palm trees are removed.

REFERENCES

LSA Associates, Inc. (2020). *Focused Bat Survey 9850, 9876, 9900, and 9988 Wilshire Boulevard One Beverly Hills Overlay Specific Plan.*

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Attachment A. Project Figures

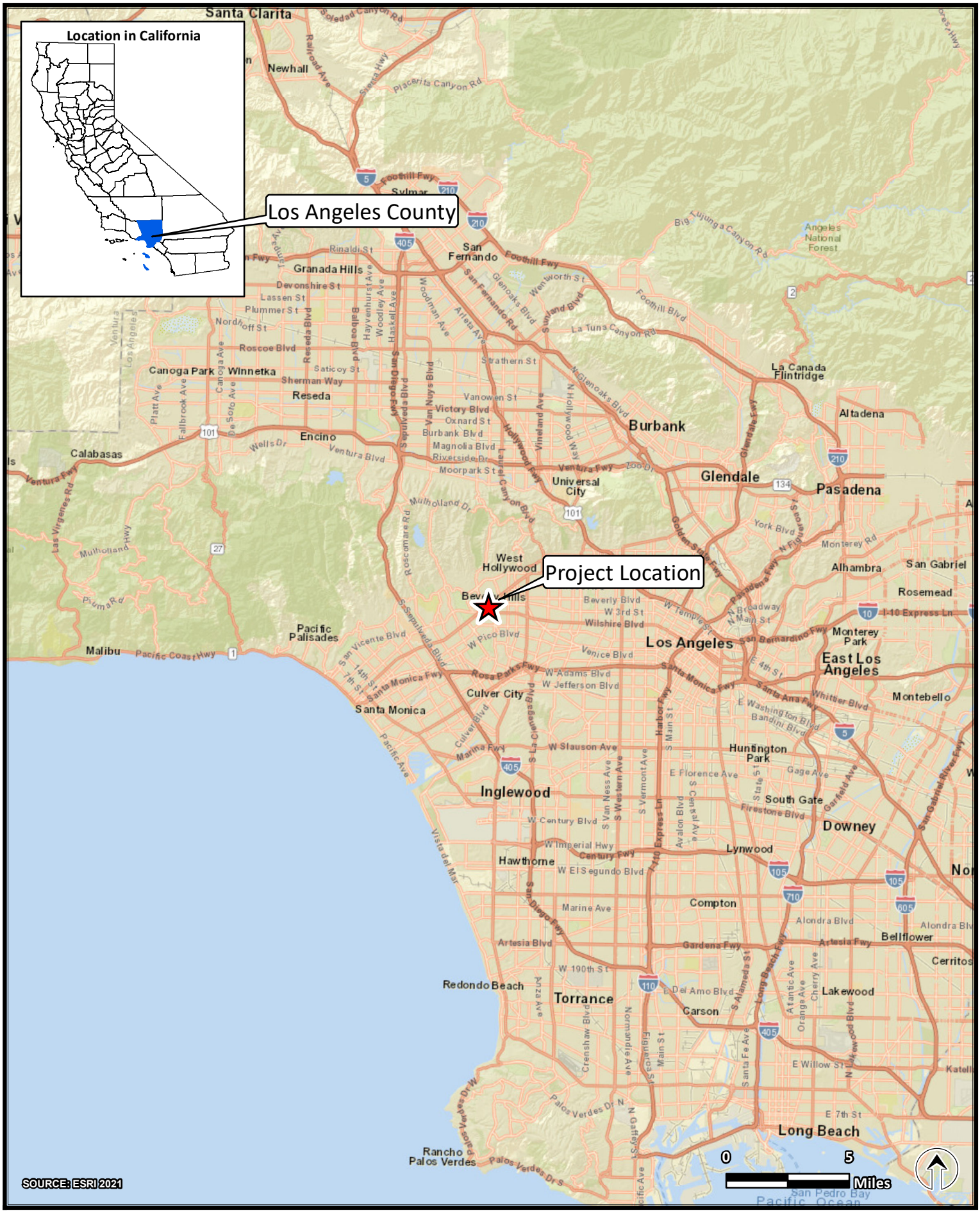

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FIGURE 1. REGIONAL LOCATION
Cheval Blanc Beverly Hills Project

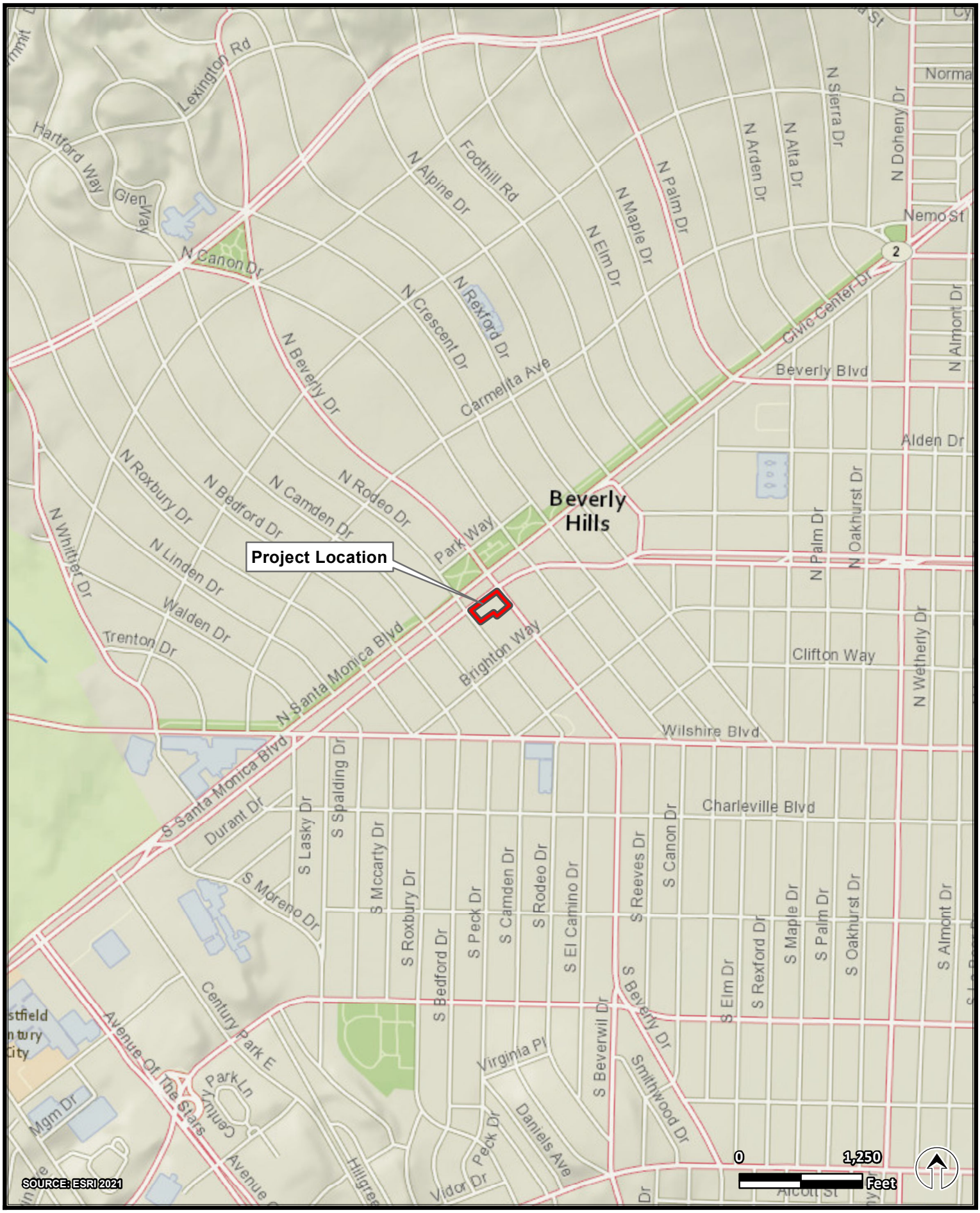

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FIGURE 2. PROJECT LOCATION
Cheval Blanc Beverly Hills Project

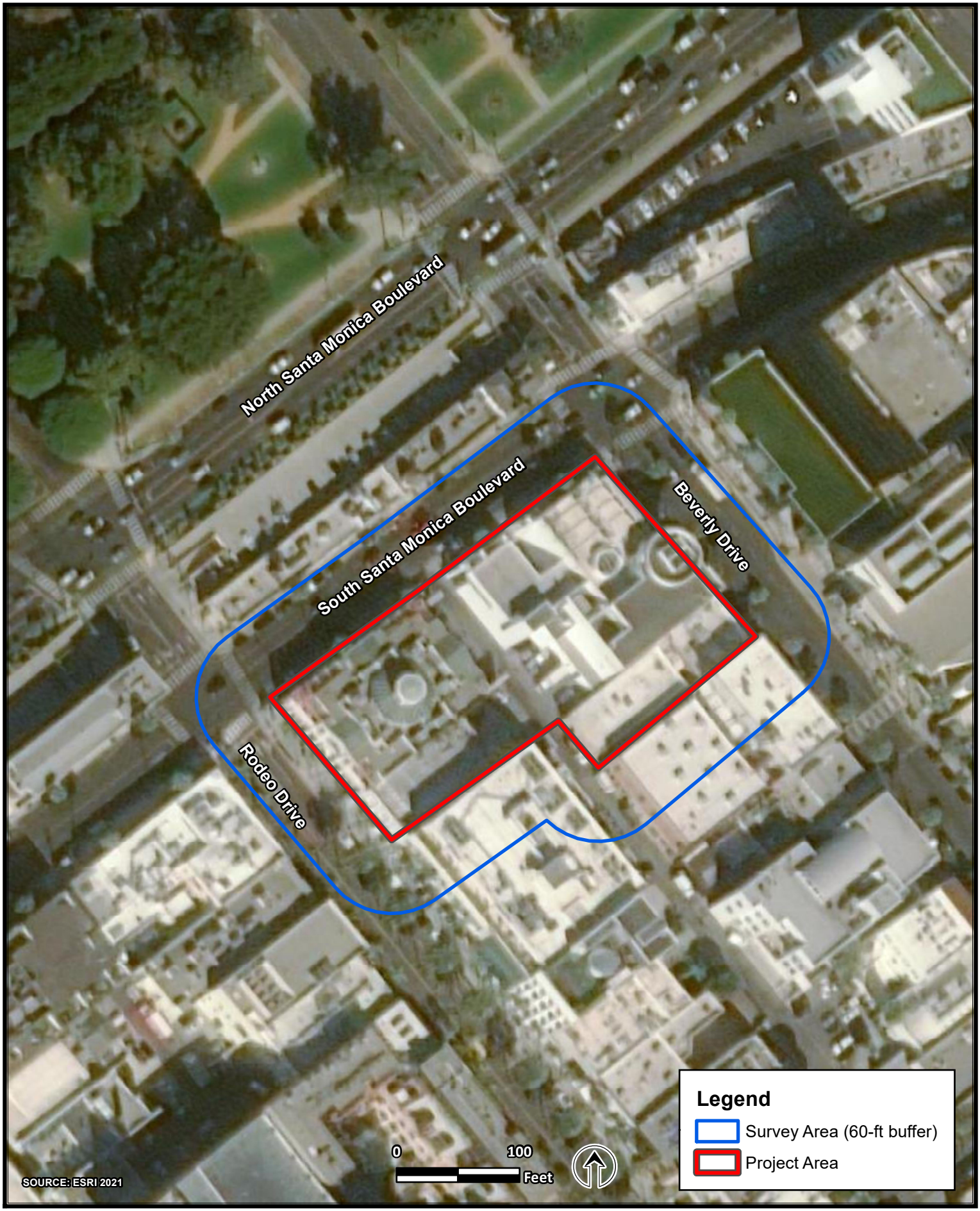

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FIGURE 3. PROJECT SITE AND SURVEY AREA
Cheval Blanc Beverly Hills Project

Attachment B. California Natural Diversity Database Species List

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Canoga Park (3411825) OR Van Nuys (3411824) OR Burbank (3411823) OR Topanga (3411815) OR Beverly Hills (3411814) OR Hollywood (3411813) OR Venice (3311884) OR Inglewood (3311883))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S1S2	SSC
Aglaothorax longipennis Santa Monica shieldback katydid	IIORT32020	None	None	G1G2	S1S2	
Aimophila ruficeps canescens southern California rufous-crowned sparrow	ABPBX91091	None	None	G5T3	S3	WL
Anaxyrus californicus arroyo toad	AAABB01230	Endangered	None	G2G3	S2S3	SSC
Anniella spp. California legless lizard	ARACC01070	None	None	G3G4	S3S4	SSC
Anniella stebbinsi Southern California legless lizard	ARACC01060	None	None	G3	S3	SSC
Antrozous pallidus pallid bat	AMACC10010	None	None	G4	S3	SSC
Arenaria paludicola marsh sandwort	PDCAR040L0	Endangered	Endangered	G1	S1	1B.1
Arizona elegans occidentalis California glossy snake	ARADB01017	None	None	G5T2	S2	SSC
Aspidoscelis tigris stejnegeri coastal whiptail	ARACJ02143	None	None	G5T5	S3	SSC
Astragalus brauntonii Braunton's milk-vetch	PDFAB0F1G0	Endangered	None	G2	S2	1B.1
Astragalus pycnostachyus var. lanosissimus Ventura Marsh milk-vetch	PDFAB0F7B1	Endangered	Endangered	G2T1	S1	1B.1
Astragalus tener var. titi coastal dunes milk-vetch	PDFAB0F8R2	Endangered	Endangered	G2T1	S1	1B.1
Athene cunicularia burrowing owl	ABNSB10010	None	None	G4	S3	SSC
Atriplex coulteri Coulter's saltbush	PDCHE040E0	None	None	G3	S1S2	1B.2
Atriplex pacifica south coast saltscale	PDCHE041C0	None	None	G4	S2	1B.2
Atriplex parishii Parish's brittlescale	PDCHE041D0	None	None	G1G2	S1	1B.1
Atriplex serenana var. davidsonii Davidson's saltscale	PDCHE041T1	None	None	G5T1	S1	1B.2
Berberis nevinii Nevin's barberry	PDBER060A0	Endangered	Endangered	G1	S1	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Bombus crotchii Crotch bumble bee	IIHYM24480	None	Candidate Endangered	G3G4	S1S2	
Brennania belkini Belkin's dune tabanid fly	IIDIP17010	None	None	G1G2	S1S2	
Buteo swainsoni Swainson's hawk	ABNKC19070	None	Threatened	G5	S3	
California Walnut Woodland California Walnut Woodland	CTT71210CA	None	None	G2	S2.1	
Calochortus clavatus var. gracilis slender mariposa-lily	PMLIL0D096	None	None	G4T2T3	S2S3	1B.2
Calochortus plummerae Plummer's mariposa-lily	PMLIL0D150	None	None	G4	S4	4.2
Calystegia felix lucky morning-glory	PDCON040P0	None	None	G1Q	S1	1B.1
Centromadia parryi ssp. australis southern tarplant	PDAST4R0P4	None	None	G3T2	S2	1B.1
Chaenactis glabriuscula var. orcuttiana Orcutt's pincushion	PDAST20095	None	None	G5T1T2	S1	1B.1
Charadrius nivosus nivosus western snowy plover	ABNNB03031	Threatened	None	G3T3	S2	SSC
Chenopodium littoreum coastal goosefoot	PDCHE091Z0	None	None	G1	S1	1B.2
Chloropyron maritimum ssp. maritimum salt marsh bird's-beak	PDSCR0J0C2	Endangered	Endangered	G4?T1	S1	1B.2
Chorizanthe parryi var. fernandina San Fernando Valley spineflower	PDPGN040J1	None	Endangered	G2T1	S1	1B.1
Cicindela hirticollis gravida sandy beach tiger beetle	IICOL02101	None	None	G5T2	S2	
Cicindela senilis frosti senile tiger beetle	IICOL02121	None	None	G2G3T1T3	S1	
Coelus globosus globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
Coturnicops noveboracensis yellow rail	ABNME01010	None	None	G4	S1S2	SSC
Danaus plexippus pop. 1 monarch - California overwintering population	IILEPP2012	Candidate	None	G4T2T3	S2S3	
Deinandra minthornii Santa Susana tarplant	PDAST4R0J0	None	Rare	G2	S2	1B.2
Diadophis punctatus modestus San Bernardino ringneck snake	ARADB10015	None	None	G5T2T3	S2?	
Dithyrea maritima beach spectaclepod	PDBRA10020	None	Threatened	G1	S1	1B.1

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Dodecahema leptoceras slender-horned spineflower	PDPGN0V010	Endangered	Endangered	G1	S1	1B.1
Dudleya blochmaniae ssp. blochmaniae Blochman's dudleya	PDCRA04051	None	None	G3T2	S2	1B.1
Dudleya cymosa ssp. ovatifolia Santa Monica dudleya	PDCRA040A5	Threatened	None	G5T1	S1	1B.1
Dudleya multicaulis many-stemmed dudleya	PDCRA040H0	None	None	G2	S2	1B.2
Empidonax traillii extimus southwestern willow flycatcher	ABPAE33043	Endangered	Endangered	G5T2	S1	
Emys marmorata western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
Eryngium aristulatum var. parishii San Diego button-celery	PDAPI0Z042	Endangered	Endangered	G5T1	S1	1B.1
Eucosma hennei Henne's eucosman moth	IILEM0R390	None	None	G1	S1	
Eugnosta busckana Busck's gallmoth	IILEM2X090	None	None	G1G3	SH	
Eumops perotis californicus western mastiff bat	AMACD02011	None	None	G4G5T4	S3S4	SSC
Euphilotes battoides allyni El Segundo blue butterfly	IILEPG201B	Endangered	None	G5T1	S1	
Glyptostoma gabrielense San Gabriel chestnut	IMGASB1010	None	None	G2	S2	
Gonidea angulata western ridged mussel	IMBIV19010	None	None	G3	S1S2	
Helianthus nuttallii ssp. parishii Los Angeles sunflower	PDAST4N102	None	None	G5TX	SX	1A
Horkelia cuneata var. puberula mesa horkelia	PDROS0W045	None	None	G4T1	S1	1B.1
Lasionycteris noctivagans silver-haired bat	AMACC02010	None	None	G3G4	S3S4	
Lasiurus cinereus hoary bat	AMACC05030	None	None	G3G4	S4	
Lasiurus xanthinus western yellow bat	AMACC05070	None	None	G4G5	S3	SSC
Lasthenia glabrata ssp. coulteri Coulter's goldfields	PDAST5L0A1	None	None	G4T2	S2	1B.1
Laterallus jamaicensis coturniculus California black rail	ABNME03041	None	Threatened	G3G4T1	S1	FP
Malacothamnus davidsonii Davidson's bush-mallow	PDMAL0Q040	None	None	G2	S2	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Microtus californicus stephensi south coast marsh vole	AMAFF11035	None	None	G5T2T3	S1S2	SSC
Monardella hypoleuca ssp. hypoleuca white-veined monardella	PDLAM180A5	None	None	G4T3	S3	1B.3
Nama stenocarpa mud nama	PDHYD0A0H0	None	None	G4G5	S1S2	2B.2
Nasturtium gambelii Gambel's water cress	PDBRA270V0	Endangered	Threatened	G1	S1	1B.1
Navarretia fossalis spreading navarretia	PDPLM0C080	Threatened	None	G2	S2	1B.1
Navarretia prostrata prostrate vernal pool navarretia	PDPLM0C0Q0	None	None	G2	S2	1B.2
Neotoma lepida intermedia San Diego desert woodrat	AMAFF08041	None	None	G5T3T4	S3S4	SSC
Nyctinomops femorosaccus pocketed free-tailed bat	AMACD04010	None	None	G5	S3	SSC
Nyctinomops macrotis big free-tailed bat	AMACD04020	None	None	G5	S3	SSC
Oncorhynchus mykiss irideus pop. 10 steelhead - southern California DPS	AFCHA0209J	Endangered	None	G5T1Q	S1	
Onychobaris langei Lange's El Segundo Dune weevil	IICOL4W010	None	None	G1	S1	
Onychomys torridus ramona southern grasshopper mouse	AMAFF06022	None	None	G5T3	S3	SSC
Orcuttia californica California Orcutt grass	PMPOA4G010	Endangered	Endangered	G1	S1	1B.1
Panoquina errans wandering (=saltmarsh) skipper	IILEP84030	None	None	G4G5	S2	
Passerculus sandwichensis beldingi Belding's savannah sparrow	ABPBX99015	None	Endangered	G5T3	S3	
Pelecanus occidentalis californicus California brown pelican	ABNFC01021	Delisted	Delisted	G4T3T4	S3	FP
Perognathus longimembris brevinasus Los Angeles pocket mouse	AMAFD01041	None	None	G5T2	S1S2	SSC
Perognathus longimembris pacificus Pacific pocket mouse	AMAFD01042	Endangered	None	G5T1	S1	SSC
Phacelia stellaris Brand's star phacelia	PDHYD0C510	None	None	G1	S1	1B.1
Phrynosoma blainvillii coast horned lizard	ARACF12100	None	None	G3G4	S3S4	SSC
Polioptila californica californica coastal California gnatcatcher	ABPBJ08081	Threatened	None	G4G5T3Q	S2	SSC

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Potentilla multijuga Ballona cinquefoil	PDROS1B120	None	None	GX	SX	1A
Pseudognaphalium leucocephalum white rabbit-tobacco	PDAST440C0	None	None	G4	S2	2B.2
Quercus dumosa Nuttall's scrub oak	PDFAG050D0	None	None	G3	S3	1B.1
Riparia riparia bank swallow	ABPAU08010	None	Threatened	G5	S2	
Riversidian Alluvial Fan Sage Scrub Riversidian Alluvial Fan Sage Scrub	CTT32720CA	None	None	G1	S1.1	
Sidalcea neomexicana salt spring checkerbloom	PDMAL110J0	None	None	G4	S2	2B.2
Socalchemmis gertschi Gertsch's socalchemmis spider	ILARAU7010	None	None	G1	S1	
Sorex ornatus salicornicus southern California saltmarsh shrew	AMABA01104	None	None	G5T1?	S1	SSC
Southern Coast Live Oak Riparian Forest Southern Coast Live Oak Riparian Forest	CTT61310CA	None	None	G4	S4	
Southern Coastal Salt Marsh Southern Coastal Salt Marsh	CTT52120CA	None	None	G2	S2.1	
Southern Cottonwood Willow Riparian Forest Southern Cottonwood Willow Riparian Forest	CTT61330CA	None	None	G3	S3.2	
Southern Dune Scrub Southern Dune Scrub	CTT21330CA	None	None	G1	S1.1	
Southern Sycamore Alder Riparian Woodland Southern Sycamore Alder Riparian Woodland	CTT62400CA	None	None	G4	S4	
Spea hammondii western spadefoot	AAABF02020	None	None	G2G3	S3	SSC
Spermolepis lateriflora western bristly scaleseed	PDAPI23080	None	None	G5	SH	2A
Sternula antillarum browni California least tern	ABNNM08103	Endangered	Endangered	G4T2T3Q	S2	FP
Streptocephalus woottoni Riverside fairy shrimp	ICBRA07010	Endangered	None	G1G2	S1S2	
Symphyotrichum defoliatum San Bernardino aster	PDASTE80C0	None	None	G2	S2	1B.2
Symphyotrichum greatae Greata's aster	PDASTE80U0	None	None	G2	S2	1B.3
Taxidea taxus American badger	AMAJF04010	None	None	G5	S3	SSC
Thamnophis hammondii two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Thelypteris puberula var. sonorensis Sonoran maiden fern	PPTHE05192	None	None	G5T3	S2	2B.2
Trigonoscuta dorothea dorothea Dorothy's El Segundo Dune weevil	IICOL51021	None	None	G1T1	S1	
Tryonia imitator mimic tryonia (=California brackishwater snail)	IMGASJ7040	None	None	G2	S2	
Vireo bellii pusillus least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S2	

Record Count: 107

Attachment C. Photographs of the Survey Area

Photo 1. Mexican fan palms and Tipu Trees to be removed on North Beverly Drive; view facing southeast

Photo 2. Mexican fan palms to be removed on South Santa Monica Boulevard; view facing southwest

Photo 3. King palms to be removed on North Rodeo Drive, view facing northwest

Photo 4. Mexican fan palm maintained and trimmed of dead palm fronds on South Santa Monica Boulevard, view facing northeast

Photo 5. Mexican fan palm maintained and trimmed of dead palm fronds on North Beverly Drive, view facing north

Photo 6. King palm maintained and trimmed of dead palm fronds on North Rodeo Drive, view facing southwest

Photo 7. Giant fig tree (*Ficus macrophylla*) in Beverly Gardens Park on North Santa Monica Boulevard, view facing northwest


Photo 8. Unmaintained Mexican fan palm with skirt of dead palm fronds on North Santa Monica Boulevard adjacent to Beverly Gardens Park; view facing northwest