

November 7, 2024

Nico Turek Topos Ventures LLC 300 Lenora Street, PMB 6322 Seattle, WA 98121

RE: Biological Evaluation Letter, Yosemite Gold Country Lodge & Campground Redevelopment Project, Mariposa County, CA

Dear Mr. Turek,

This letter report summarizes a biological evaluation conducted by Live Oak Associates, Inc. (LOA) for an approximately 4-acre site ("project site") in Mariposa County that is proposed for the Yosemite Gold Country Lodge & Campground Redevelopment Project ("project"). The project site is located in the outskirts of the community of Coulterville, southwest of State Route 49 at street address 10407 CA-49 (Figure 1). It can be found on the *Coulterville* U.S. Geological Survey (USGS) 7.5-minute quadrangle within Section 34 of Township 2 South, Range 16 East (Figure 2).

On November 5, 2024, LOA biologist Jeff Gurule surveyed the site for its habitat values, flora and fauna, and potential to support special status species and other sensitive biological resources. As follows is a brief description of the proposed project and project site, a discussion of potential impacts to biological resources that may result from site development, and recommended mitigations for biological impacts that would be considered significant under the California Environmental Quality Act (CEQA).

Project Description

The project is the redevelopment of the defunct Yosemite Gold Country Lodge & Campground (YGCL). Proposed improvements are as follows:

- Demolition and removal of all existing structures, including the motel building, office/reception/manager's residence, laundry building, shop building, bathroom/shower building, mobile homes, cabin shells, and other unusable remnants of the former motel/Special Occupancy Park
- Decommission the private water supply well in favor of continued municipal public water service, unless it is determined that it is useful for fire safety.
- Reorganize the park layout to accommodate 25 sites plus supporting amenities and structures:
 - RV pads will be compacted gravel with "full hookup" including 50-amp electric pedestals, potable water supply, and 3" sewer cleanout connections.
 - 25 RVIA Certified and HCD approved RVs will be docked at each pad and continuously hooked up. No transient RV spaces are being offered for rental.
 - One (1) mobile home site reserved for workforce housing of no more than two (2) employees.
- Two (2) 250 SF enclosed and conditioned structures for communal gathering.

OAKHURST

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SAN JOSE

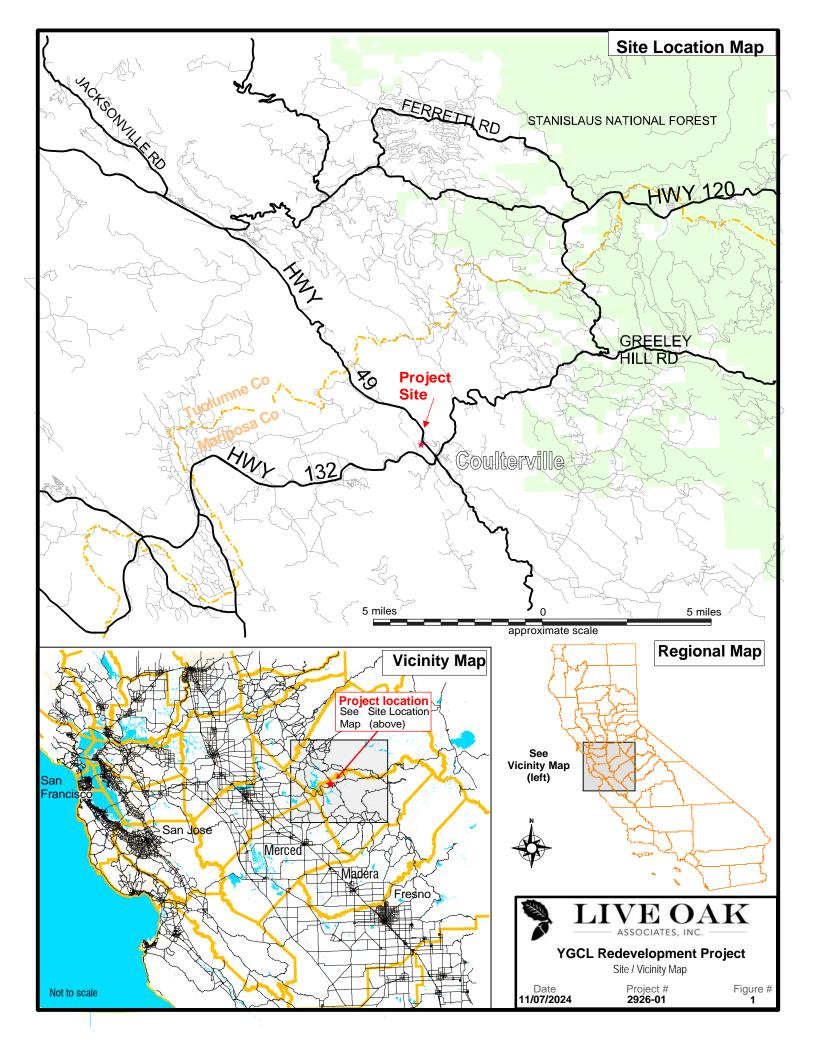
6840 Via Del Oro, Suite 220 San Jose, CA 95119

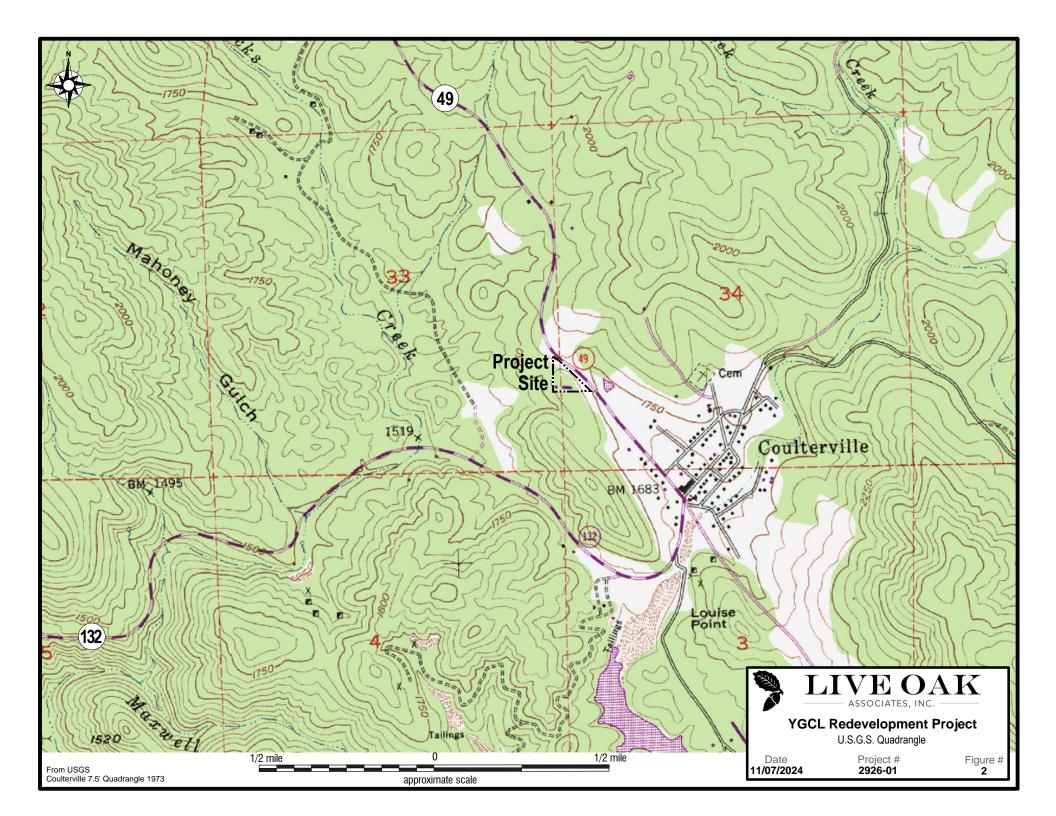
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SOUTH LAKE TAHOE

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- 250 SF check-in building with "camp store" and ½ bathroom complete with electrical, water and sewer connections.
- 200 SF electric sauna and cold-plunge tank.
- 800 SF pavilion for gatherings.
- Two (2) 120 SF nature-viewing decks.
- 240 SF bathhouse with toilets, showers and sinks for guests.
- 33 parking stalls.
- Unpaved walking trails connecting portions of the site.
- Install new signage and lighting in conformance with historic design overlay standards.
- Enhanced landscaping removal of non-native and invasive species and re-vegetation with native and fire resistant species.
- Privacy fencing, where necessary.
- Driveway easement improvements.
- Underground domestic water, sewer collection, and electric throughout the site will feature code compliant design and construction material standards.
- Ensure compliance with all applicable statutes, regulations, and standards.

A site plan is presented in Attachment 1.

Site Description and Conditions

At the time of LOA's field survey the project site consisted of dilapidated buildings and infrastructure from the defunct YGCL, which was in operation from the 1960s until June 2021. Remnant infrastructure consisted of dilapidated buildings and paved and/or compacted roads, parking lots, building pads, and walkways. Photos of the site are presented in Attachment 2. Surrounding lands consist of rural residential land with little development.

The site has hilly topography with elevations ranging from approximately 1,785 to 1,850 feet above sea level. It contains two soil mapping units: Loafercreek-Gopheridge complex, 15 to 30 percent slopes; and Loafercreek-Bonanza complex, 3 to 15 percent slopes These soil mapping units are not considered hydric, meaning the soils would not be prone to wetland development. These soils are also not considered ultramafic or serpentine and would not support plant species adapted to serpentine soils. Furthermore, most of the site has experienced soil-disturbing activities such as grading, excavation, and compaction. Natural drainage features are absent from the site.

Two habitat/land use types, categorized as ruderal and oak woodland, were identified on the project site at the time of the field survey (Figure 3). Ruderal land accounted for nearly all areas of the site; oak woodland was limited to an undeveloped strip of land beyond the fenced area of the previous operation. These habitat/land uses are described below.

Ruderal

Ruderal areas of the site comprise the operational footprint of the YGCL. Ruderal areas of the site supported naturalized and landscape vegetation. Herbaceous vegetation included non-native grasses such as ripgut brome (*Bromus diandrus*), foxtail barley (*Hordeum murinum*), wild oats (*Avena sp.*), and softchess brome (*Bromus hordeacus*), among others and non-native forbs such as field hedge parsley (*Torilis arvensis*), Italian thistle (*Carduus pycnocephalus*), and rose clover (*Trifolium hirtum*), among others. A few native herbaceous species occurred in ruderal areas of the site such as Heermann's tarweed (*Holocarpha heermannii*), American bird's foot trefoil (*Acmispon americanus*), and vinegarweed (*Trichostema lanceolatum*). Native shrubs and trees in ruderal areas of the site included blue oak (*Quercus douglasii*),





interior live oak (*Quercus wislizeni*), foothill pine (*Pinus sabiniana*), toyon (*Heteromeles arbutifolia*), and poison oak (*Toxicodendron diversilobum*). Examples of landscape trees and shrubs on the site are Italian cypress (*Cupressus sempervirens*), white mulberry (*Morus alba*), silver dollar gum (*Eucalyptus polyanthemos*), firethorn (*Pyracantha sp.*), and ornamental plum (*Prunus sp.*).

Ruderal areas of the site have some value for native wildlife, primarily common species tolerant of or attracted to human development and landscaping. Amphibian use of this area is expected to be absent due to the absence of nearby aquatic breeding habitat. The site provides habitat for a few reptiles such as western fence lizards (*Scleroporus occidentalis*), southern alligator lizard (*Gerrhonotus multicarinatus*), gopher snake (*Pituophis melanoleuca*), California kingsnake (*Lampropeltis californiae*), and northern Pacific rattlesnake (*Crotalus oreganus oreganus*).

The site's ruderal lands also provide habitat for various bird species. Resident birds observed in this area include spotted towhees (*Pipilo maculatus*), yellow-rumped warblers (*Setophaga coronata*), dark-eyed juncos (*Junco hyemalis*), oak titmice (*Baeolophus inornatus*), white-crowned sparrows (*Zonotrichia leucophrys*), and bushtits (*Psaltriparus minimus*). Summer migrants may include house wrens (*Troglodytes aedon*) and Bullock's orioles (*Icterus bullocki*). Raptors such as Cooper's hawks (*Accipiter cooperi*) and western screech owls (*Strix occidentalis*) may occur here, as well.

Mammals expected to occasionally or regularly use or pass through this area of the site include Botta's pocket gopher (*Thomomys bottae*), California mouse (*Peromyscus californicus*), deer mouse (*Peromyscus maniculatus*), house mouse (*Mus musculus*), gray fox (*Urocyon cinereoargenteus*), coyote (*Canis latrans*), striped skunk (*Mephitis mephitis*), and raccoon (*Procyon lotor*). Various bat species could roost in abandoned buildings and forage on or over ruderal areas of the site.

Oak Woodland

The oak woodland area of the site comprises a narrow strip of undeveloped habitat south of the fenced area of the YGCL. Herbaceous vegetation here included non-native grasses such as ripgut brome, softchess brome, and wild oats, among others. The dominant non-native forb was field hedge parsley. Native forb species included clarkia (*Clarkia sp.*), harvest brodiaea (*Brodiaea elegans*), and common madia (*Madia elegans*), among others. Trees and shrubs in the oak woodland created a relatively dense canopy and included blue oak, interior live oak, foothill pine, buck brush (*Ceanothus cuneatus*), and large patches of poison oak.

Nearly all of the wildlife species expected in the ruderal areas of the site would also be expected in the oak woodland area of the site. Species observed only in the oak woodland during the field survey were avian species that included the acorn woodpeckers (*Melanerpes formicivorus*), scrub jays (*Aphelocoma coeruloescens*), and ruby-crowned kinglet (*Regulus calendula*) and nests of the big-eared woodrat (*Neotoma macrotis*).

Special Status Species

Many species of plants and animals within the state of California have low populations, limited distributions, or both. Such species may be considered "rare" and are vulnerable to extirpation as the state's human population grows and the habitats these species occupy are converted to agricultural and residential uses. State and federal laws have provided the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) with a mechanism for conserving and protecting the diversity of plant and animal species native to the state. A sizable number of native plants and animals have been formally designated as threatened or endangered under state and federal endangered species legislation. Others have been designated as "candidates" for such listing. Still others have been designated as "species



of special concern" by the CDFW. The California Native Plant Society (CNPS) has developed its own set of lists (i.e., California Rare Plant Ranks, or CRPR) of native plants considered rare, threatened, or endangered (CNPS 2024). Collectively, these plants and animals are referred to as "special status species."

The California Natural Diversity Data Base (CNDDB; CDFW 2024) was used to query special status species occurrences in the *Coulterville* U.S. Geological Survey 7.5-minute quadrangle, in which the site is situated.



TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

PLANTS

Species	Status	Habitat	Occurrence on the Project Site
Rawhide Hill Onion	CRPR	Occurs in cismontane woodland.	Absent. Suitable soils and habitat are absent
(Allium tuolumnense)	1B	Restricted to serpentine soil, usually in	from the project site.
		grey pine chaparral. steep, rocky,	
		south-facing slopes or small	
		drainages. Elevations between 1,740 and 6,650 feet. Blooms April-June	
Big-scale Balsamroot	CRPR	Found in dry, open areas in chaparral,	Unlikely. The undisturbed strip of land at the
(Balsamorhiza	1B	grassland, and woodland habitats,	south end of the site provides unsuitable to
macrolepis)		sometimes in serpentine soils.	marginal habitat for this species do to the
		Elevations up to 5,000 feet; blooms	mostly dense canopy cover. No
		March-June.	Balsamorhiza species were observed during
			LOA's field survey; plants of this genus are
			perennial and distinctive, and should have been readily identifiable if present. The
			nearest documented populations of this
			species are located more than 5 miles south
			of the site along a ridgeline of Hunter Valley
			Mountain at a much higher elevation.
Small's Southern Clarkia	CRPR	This species occurs in open, rocky	Absent. Open rocky habitat in which this
(Clarkia australis)	1B	sites in conifer forest or oak woodland	species is typically found is absent from the
		between 2,800 and 6,200 feet in elevation in Calaveras, Madera,	project site. The project site is below the species elevational range.
		Mariposa, and Tuolumne Counties.	species elevational range.
		Blooms May – August.	
Mariposa Clarkia	CRPR	Found in chaparral and woodland	Absent. Serpentine soils are absent from the
(Clarkia biloba ssp.	1B	habitats on serpentine soils. Several	project site.
australis)		occurrences known from foothill	
		woodland / riparian ecotone. Elevations between 1,000 and 4,800	
		feet. Blooms April-July.	
Beaked Clarkia	CRPR	Occurs in oak or pine woodlands,	Unlikely. The undisturbed strip of land at the
(Clarkia rostrata)	1B	often on north-facing slopes,	south end of the site is generally south facing,
		sometimes on sandstone; blooms	which is not preferred by this species. The
		May-July; elevations 560-3,445 feet.	project site is outside the apparent
			distribution of this species, based on iNaturalist and CNDDB occurrences. The
			nearest CNDDB populations of this species
			are 5 miles and more to the south.
Mariposa Cryptantha	CRPR	Occurs in rocky chaparral habitats;	Absent. Suitable habitat and soils are absent
(Cryptantha mariposae)	1B	serpentine soils; blooms April-May;	from the project site.
P. LIPIL C	CDES	elevations 660-2,130 ft.	
Red Hills Cryptantha	CRPR	Occurs in serpentine soils of chaparral	Absent. Suitable habitat and soils are absent
(Cryptantha spithamaea)	1B	and cismontane woodland; blooms April-May; elevations 900-1,510 ft.	from the project site. The site is above this species' elevational range.
Yellow-lipped Pansy	CRPR	Found in vernally wet or mesic sites in	Absent. Suitable habitat is absent from the
Monkeyflower	1B	lower montane coniferous forest or	project site. The site is below this species'
(Diplacus pulchellus)		meadow habitats; elevations 2,000-	elevational range.
		6,500 feet. Blooms April-July.	
Shaggyhair Lupine	CRPR	Found in serpentine chaparral habitats	Absent. Suitable habitat and soils are absent
(Lupinus spectabilis)	1B	on open, rocky slopes; elevations	from the project site.
		between 900 and 2,700 feet. Often surrounded by gray pine woodland.	
		Blooms April-May.	
		Bioonis Aprii-iviay.	



TABLE 1. LIST OF SPECIAL STATUS SPECIES THAT COULD OCCUR IN THE PROJECT VICINITY

ANIMALS

Species	Status	Habitat	Occurrence on the Project Site
Foothill Yellow-legged Frog (Rana boylii)	FE, CE	Found in or near rocky streams in a variety of habitats. Uses submerged rocks and debris for cover. Requires gravel or rocks in moving water near stream margins for reproduction.	Absent. Suitable streams required by this species are absent from the project site and immediately surrounding lands.
Pallid Bat (Antrozous pallidus)	CSC	Roosts in rocky outcrops, cliffs, and crevices with access to open habitats for foraging. May also roost in caves, mines, hollow trees, and buildings. This opportunistic forager gleans a variety of arthropod prey from surfaces, and may also take insects in flight.	Possible. The pallid bat could potentially roost in the site's vacant buildings and could potentially forage on or over the site. Trees on the site did not appear to provide hollows or cavities suitable for roosting.
Western Red Bat (Lasiurus blossevillii)	CSC	This mostly solitary bat roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	Possible. The western red bat could potentially roost in the site's trees, and forage over the site.

OCCURRENCE DESIGNATIONS AND STATUS CODES

Present: Species observed on the site at time of field surveys or during recent past.

Likely: Species not observed on the site, but it may reasonably be expected to occur there on a regular basis.

Possible: Species not observed on the site, but it could occur there from time to time.

Unlikely: Species not observed on the site, and would not be expected to occur there except, perhaps, as a transient. **Absent**: Species not observed on the site and precluded from occurring there because habitat requirements not met.

STATUS CODES

FE FT FC	Federally Endangered Federally Threatened Federal Candidate	CE CT CFP CSC	California Endangered California Threatened California Fully Protected California Species of Special Concern
CNPS	LISTING		
1A	Plants Presumed Extinct in California	2	Plants Rare, Threatened, or Endangered in
1B	Plants Rare, Threatened, or Endangered in		California, but more common elsewhere

Jurisdictional Waters

California and elsewhere

Jurisdictional waters are those rivers, creeks, drainages, lakes, ponds reservoirs, and wetlands that are subject to the authority of the U.S. Army Corps of Engineers (USACE), CDFW, and/or the Regional Water Quality Control Board (RWQCB). In general, the USACE regulates navigable waters, tributaries to navigable waters, and wetlands with a continuous surface connection to these waters, where wetlands are defined by the presence of hydric soils, hydrophytic vegetation, and wetland hydrology. All waters under



USACE jurisdiction are also regulated by the RWQCB as waters of the State. Additionally, the RWQCB asserts jurisdiction over certain isolated features outside the jurisdiction of the USACE. The CDFW has jurisdiction over waters that have a defined bed and bank.

Aquatic features, including any potentially jurisdictional waters or wetlands, are absent from the project site.

Sensitive Habitats and Designated Critical Habitat

California contains a wide range of natural communities, or unique assemblages of plants and animals. These communities have largely been classified and mapped by CDFW as part of their Vegetation Classification and Mapping Program (VegCAMP). Natural communities are assigned state and global ranks according to their rarity and the magnitude and trend of the threats they face. Any natural community with a state rank of 3 or lower (on a 1 to 5 scale) is considered "sensitive" and must be considered in CEQA review.

Sensitive natural communities are absent from the project site.

Wildlife Movement Corridors

Wildlife movement corridors are routes that animals regularly and predictably follow during seasonal migration, dispersal from native ranges, daily travel within home ranges, and inter-population movements. Movement corridors in California are typically associated with valleys, ridgelines, and rivers and creeks supporting riparian vegetation.

The project site does not contain any geographical features that could function as a wildlife movement corridor.

Oak Woodland Conservation Act

The Oak Woodland Conservation Act (SB 1334) and California Public Resources Code Section 21083.4 require counties to address impacts to oak woodlands as part of the CEQA review process. In determining whether a discretionary project requires an environmental impact report, negative declaration, or mitigated negative declaration, the county in question must evaluate the significance of any associated conversion of oak woodlands, where "oak woodland" is typically defined as a native oak (*Quercus* sp.) stand with greater than 10 percent canopy cover, consistent with California Fish and Game Code Section 1361. Where impacts are found to be significant, the County must implement appropriate mitigation measures. The statute identifies a number of mitigation options that, individually or in combination, could reduce a project's impact to oak woodlands to a less than significant level. The statute also exempts a few specified activities from its requirements.

Oak woodland occurs at the southern end of the project site.

Local Policies and Ordinances

In compliance with CEQA, the lead agency must consider project conformance with applicable goals and policies of the Mariposa County General Plan and Coulterville Town Planning Area Town Plan. Goal 11-4 of the Mariposa County General Plan is to; "Conserve and enhance the ecosystems, plant communities, wildlife habitats, and the inherent diversity of both plant and animal species for the recreational, commercial, aesthetic, and basic ecosystems needs". To meet this goal the County has developed a number of policies and associated implementation measures that are included in the general plan. The Coulterville



Town Planning Area Town Plan has no specific goals and policies relating to the protection or conservation of biological resources.

The project does not appear to be in conflict with local policies related to biological resources.

Habitat Conservation Plans and Natural Community Conservation Plans

Section 10 of the federal Endangered Species Act establishes a process by which non-federal projects can obtain authorization to incidentally take listed species, provided take is minimized and thoroughly mitigated. A Habitat Conservation Plan (HCP), developed by the project applicant in collaboration with the USFWS and/or NMFS, ensures that such minimization and mitigation will occur, and is a prerequisite to the issuance of a federal incidental take permit. Similarly, a Natural Community Conservation Plan (NCCP), developed by the project applicant in collaboration with CDFW, provides for the conservation of biodiversity within a project area, and permits limited incidental take of state-listed species.

No HCPs or NCCPs are in effect for the project vicinity.

Potentially Significant Project Impacts/Mitigation

Nesting Migratory Birds

Impact: The project site contains possible nesting habitat for a number of avian species in vegetation and in or on buildings. In fact, a few inactive nests were observed in enclosed spaces of the existing lodge building on the site. Nearly all avian species are protected under the Migratory Bird Treaty Act and related state laws. Avian species potentially nesting on or immediately adjacent to the site include the Brewer's blackbird (*Euphagus cyanocephalus*), California scrub jay, spotted towhee, and house finch (*Haemorhous mexicanus*), among others. If birds were to nest on or immediately adjacent to the project site at the time of construction, project-related activities could result in the destruction or abandonment of active nests. Construction activities that adversely affect the nesting success of birds or result in the mortality of individual birds may violate state and federal laws and would be considered a significant impact under CEQA.

Mitigation: In order to avoid impacts to nesting birds, construction will occur, where possible, outside the nesting season, which is considered February 1 – August 31. If construction must occur during the nesting season, a qualified biologist will conduct preconstruction surveys for active raptor and migratory bird nests within 7 days of the onset of these activities. Nest surveys will include all areas on and within 250 feet (500 feet for raptors) of the project site. Should any active nests be discovered in or near proposed construction zones, the biologist will identify a suitable construction-free buffer around the nest. This buffer will be identified on the ground by flagging or fencing and will be maintained until a qualified biologist has determined that the young have fledged.

Compliance with the above mitigation measures would reduce impacts to nesting birds to a less than significant level under CEQA and facilitate compliance with state and federal laws.

Special Status Bats

Impact. Development areas of the site contain structures and trees suitable for roosting by a variety of native bat species including the pallid bat (*Antrozous pallidus*) and western red bat (*Lasiurus frantzii*), both of which are California Species of Special Concern. The project site also provides suitable foraging habitat for these bat species. During the maternity season, typically April 15 to September 30, these species may roost, sometimes in large numbers, within the site's buildings (pallid bats) and trees (western red bats).



Removal of buildings or trees that contain maternity colonies could lead to the mortality of many bats, which would be considered a significant impact under CEQA.

The project will not result in a significant loss of roosting or foraging habitat for these species. Although a few potential roost sites may be removed, numerous similar roosting opportunities will remain available elsewhere, potentially on the project site and in the project vicinity. The site does not offer unique foraging habitat for these bats. Similar foraging habitats are abundant in the project vicinity and elsewhere in the region.

Mitigation. The following measures will be implemented for the protection of maternity roosting bats.

Mitigation Measure 4.1.5a (Temporal Avoidance). To avoid potential impacts to maternity bat roosts, removal of buildings or trees should occur outside of the period between April 1 and September 30, the time frame within which colony-nesting bats generally assemble, give birth, nurse their young, and ultimately disperse.

Mitigation Measure 4.1.5b (Preconstruction Surveys). If removal of buildings or trees is to occur between April 1 and September 30 (general maternity bat roost season), then within 30 days prior to their removal, a qualified biologist will survey them for the presence of bats. The biologist will look for individuals, guano, and staining, and will listen for bat vocalizations. If necessary, the biologist will wait for nighttime emergence of bats from roost sites. If no bats are observed to be roosting or breeding, then no further action would be required, and building or tree removal could proceed.

Mitigation Measure 4.1.5c (Minimization). If a non-breeding bat colony is detected during preconstruction surveys, the individuals will be humanely evicted under the direction of a qualified biologist to ensure that no harm or "take" of any bats occurs as a result of project activities.

Mitigation Measure 4.1.5d (Avoidance of Maternity Roosts). If a maternity colony is detected during preconstruction surveys, the biologist will identify a suitable disturbance-free buffer around the colony. The buffer will remain in place until the biologist determines that the nursery is no longer active.

Implementation of the above measures will reduce potential impacts to special status roosting bats to a less than significant level.

Less Than Significant Project Impacts

Special Status Plants: Nine special status plants are known from the project vicinity (see Table 1). All nine species are considered absent from or unlikely to occur on the project site due to an absence of suitable habitat and/or soils, the site's being situated outside of the species' distribution, or a combination thereof. The project is not expected to adversely affect these species, either directly or indirectly, and impacts are considered less than significant under CEQA. Mitigation measures are not warranted.

Foothill Yellow-Legged Frog: As discussed in Table 1, the foothill yellow-legged frog is considered absent from the site due to the absence of suitable habitat on or near the project site. Impacts to foothill yellow-legged frog are considered less than significant under CEQA and mitigation is not warranted.

Waters of the U.S. and State. Hydrologic features are absent from the project site. As a result, project impacts to waters of the U.S. and State are considered less than significant under CEQA and mitigation is not warranted.



Wildlife Movement Corridors. Wildlife movement corridors are absent from the project site. Project impacts to wildlife movement corridors are considered less than significant under CEQA and mitigation is not warranted.

Oak Woodland Conservation Act. The project site contains a strip of land containing oak woodland. A small portion of this woodland will be impacted by construction of six trailer pads, a viewing deck, and walkway. It is anticipated that at most only a few oak trees would require removal to accommodate these project elements. Because impacts to this small area of oak woodland will be minimal and following project development many square miles of higher-quality, contiguous oak woodland habitat will remain available at the southern end of the site and on adjoining lands, project impacts to oak woodland are considered less than significant under CEQA and mitigation is not warranted.

Consistency with Local Policies and Ordinances. The project appears consistent with the Mariposa County General Plan and Coulterville Town Planning Area Town Plan and other local policies and ordinances related to biological resources. No mitigations are warranted.

Consistency with Habitat Conservation Plans and Natural Community Conservation Plans. There are no known HCPs or NCCPs in effect for the project area. No mitigations are warranted.

Conclusion

Based on LOA's field survey and subsequent analysis, the Yosemite Gold Country Lodge and Campground Redevelopment Project has the potential to impact nesting birds and roosting bats, which would be potentially significant impacts under CEQA. These potential impacts can be mitigated to a less than significant level by limiting vegetation and building removal outside the avian nesting season or outside the bat maternal roosting season, conducting preconstruction surveys if such activities are required during these seasons, and maintaining construction-free buffers around active nests or maternal bat roosts. Potential project impacts to all other biological resources are considered less than significant under CEQA.

If you have any questions, please do not hesitate to contact me at jgurule@loainc.com or (559) 760-6842.

Sincerely,

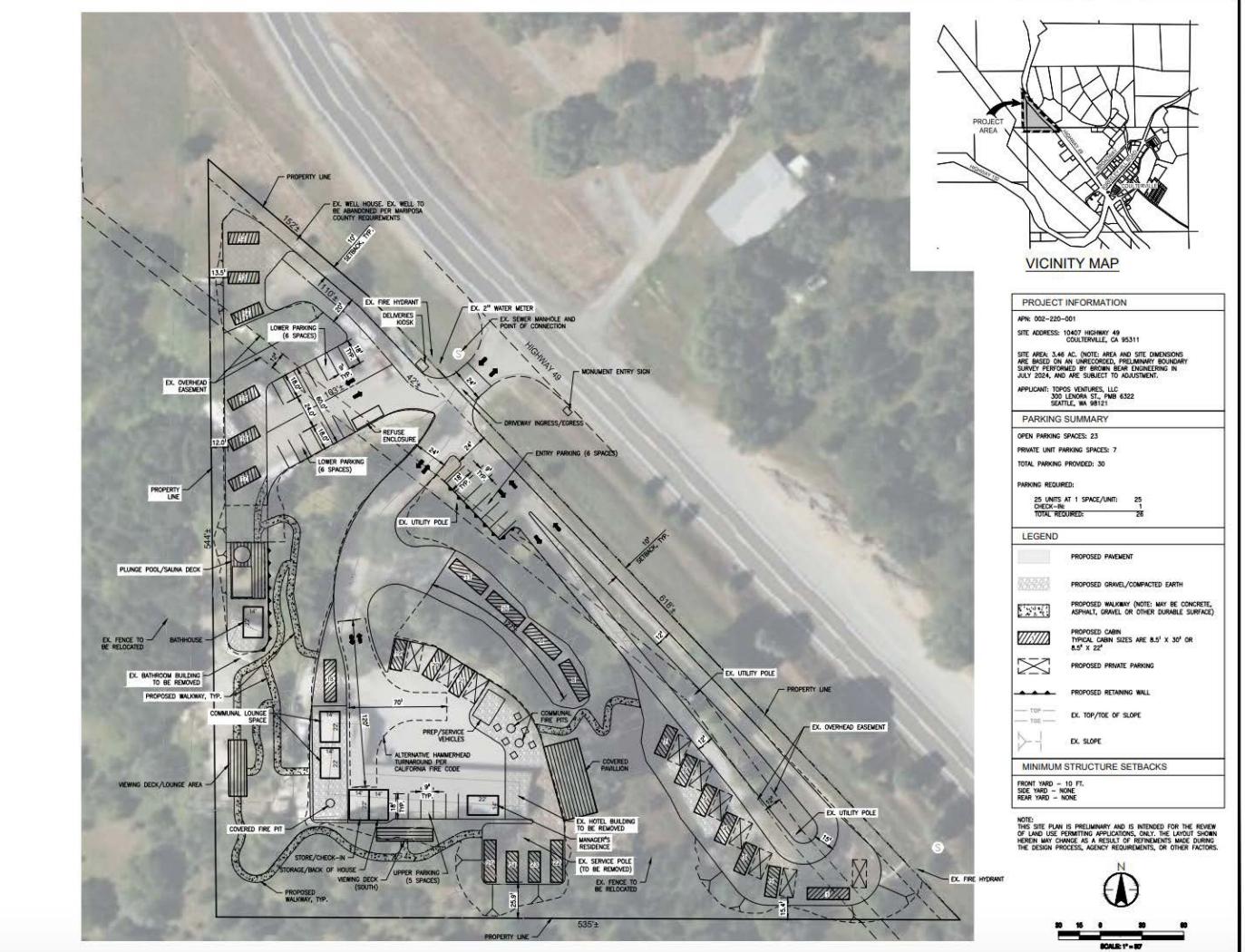
Jeff Gurule

Senior Project Manager

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ATTACHMENT 1: SITE PLAN



The Contractor and weeky and be responsible for all deventions. On MIT made about the years or windows and the respect to NVICE about days, complete to all expenses on the property of NVICE. Responsible to the property of NVICE about days. We will not the property of NVICE about days of NVICE about the property of NVICE. Responsible to the property of NVICE about the property of NVICE about



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ATTACHMENT 2: PHOTOGRAPHS OF THE PROJECT SITE





Photo 1: Example of ruderal area of site.



Photo 2: Another example of ruderal area of site.





Photo 3: Dilapidated buildings within ruderal area of site.



Photo 4: Old lodge within ruderal area of site.





Photo 5: One of a few old bird nests found on the old lodge.



Photo 6: Another example of the ruderal area of the site.





Photo 7: Oak woodland at the south end of site.



Photo 8: Another view of the oak woodland at the south end of site.