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March 20, 2019

Governor's Office of Planning & Research
MAR 29 2019
STATE CLEARINGHOUSE

Natalie Rizzi, Planner
Tuolumne County Community Resources Agency
2 South Green Street
Sonora, California 95370
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Subject: Harden Flat, LLC Site Development Permit SDP18-002 (Project)
MITIGATED NEGATIVE DECLARATION (MND)
SCH No.: 2019029073

Dear Ms. Rizzi:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the Tuolumne County Community Resources Agency for the 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, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

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

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.

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 (LSA) 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.

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 mitigation measures activities associated with construction of the Project could result in pollution of Waters of the State from storm 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 the United States Army Corps of Engineers also has jurisdiction regarding discharge and pollution to Waters of the State.

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, 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

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

PROJECT DESCRIPTION SUMMARY

Proponent: Hardin Flat, LLC/Under Canvas Inc.

Objective: The Project includes the development of an 80.1-acre site into a luxury tent campground ("glamping"). The site will include 99 luxury canvas tent sites, of which 77 would be deluxe/suite tents with bathrooms, while the remaining 22 tents would use a communal, centrally located bathroom. The Project also includes development of the following: two communal bathroom facilities, with showers; large reception/dining tent; spa tent; yoga deck; designated barbeque areas; designated fire pits; commercial kitchen trailer; laundry facility; temporary storage containers; in-ground swimming pool; well construction; septic tank and leach field; roads; parking; and associated power, water, and septic development.

Location: The Project will occur east of the community of Groveland and west of Yosemite National Park, adjacent to and south of Highway 120, within the southeastern portion of Section 26, Township 1 South, Range 18 East, Mount Diablo Baseline and Meridian, on Assessor's Parcel Numbers (APNs) 68-120-62 and 68-120-63, in Tuolumne County.

Timeframe: Unspecified.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Tuolumne 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.

The Initial Study and Mitigated Negative Declaration (IS/MND) prepared for the Project indicates that the Project area has the potential to support sensitive biological resources. The Project therefore has the potential to impact these resources. CDFW recognizes that the IS/MND outlines mitigation measures to reduce impacts to biological resources. However, CDFW is concerned that, as currently drafted, these measures may not be adequate to reduce impacts to a level that is less than significant. Specifically, CDFW is concerned regarding adequacy of mitigation measures for the State Species of Special Concern California spotted owl (*Strix occidentalis occidentalis*) and northern goshawk (*Accipiter gentilis*), special-status plants, and waterway and riparian resources.

If significant environmental impacts will occur as a result of Project implementation and cannot be mitigated to less than significant levels, an MND would not be appropriate. Further, when an MND is prepared, mitigation measures must be specific, clearly defined, and cannot be deferred to a future time. As currently drafted the IS/MND defers mitigation to a future time. For example, Mitigation Measures (MM) BIO-1 and

BIO-3 defer mitigation by requiring that mitigation measures for special-status avian and plant species, respectively, be developed only in the event of their discovery during pre-construction surveys. For example, MM BIO-1 states that if active avian nests are found the Project proponent will notify CDFW and explain what mitigation measures will be implemented. Mitigation measures listed in an MND should be feasible, measurable, implementable and enforceable. When an Environmental Impact Review (EIR) is prepared, the specifics of mitigation measures may be deferred, provided the Lead Agency commits to mitigation and establishes performance standards for implementation. Regardless of whether an MND or EIR is prepared, CDFW recommends that the CEQA document provide quantifiable and enforceable measures, as needed, that will reduce impacts to less than significant levels.

I. Project Description and Related Impact Shortcoming

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 United States Fish and Wildlife Service (USFWS)?

COMMENT 1: Vegetation Removal

Section: Agricultural and Forest Resources Section, Page 15 - 17

Issue: The IS/MND states that the Project would "remove the minimum number of trees possible," however, no other information is given. It is unclear the quantity, species, size, and location of the trees to be removed. Further, since the site will be developed, it is reasonable to assume that other trees and vegetation not directly related to construction activities may be removed for public safety purposes (i.e., hazard trees, fire hazard fuels reduction, etc.). The IS/MND does not fully disclose or analyze this impact, nor are mitigation measures included for the removal of vegetation. It is the responsibility of the Lead Agency to ensure that potential Project-related impacts are fully disclosed and analyzed, that mitigation measures are listed in the IS/MND and that they reduce impacts to less than significant levels.

Specific impact: Special-status species or their habitats may be present within the Project area and, given that the IS/MND currently lacks mitigation measures related to vegetation removal, these resources may not be identified or avoided during planned vegetation removal activities. As a result, Project activities have the potential to significantly impact special-status species. Potential impacts include injury, mortality, or reduced survivorship.

Evidence impact would be significant: Vegetation removal may result in the loss of special status-plant species and the loss of habitat that supports numerous special-status wildlife species. Clearing may also cause fragmentation and loss of sensitive habitats. The activities associated with clearing may also disturb associated soil seed banks that sustain local plant populations.

Recommended Potentially Feasible Mitigation Measure(s)

Recommended Mitigation Measure 1: CDFW recommends that all vegetation removal activities are fully analyzed and disclosed in the IS/MND, and that mitigation measures listed in the IS/MND are feasible, measurable, implemented, and enforced. This includes specifying the quantity, species, size, and location of trees that will be removed for construction-related activities and disclosing all other vegetation removal activities that will occur due to site development (i.e., hazard tree removal, fire hazard fuels reduction). CDFW recommends that larger-diameter trees in the Project area are retained, and snags, which provide nesting, foraging, roosting, and denning habitats, are also retained to the extent possible, a minimum mean value of three snags per acre is recommended (Richter 1993). CDFW further recommends that, prior to vegetation removal, a qualified biologist survey for the presence of special-status plants, suitable habitat for special-status wildlife species, and nesting birds (if Project activities will occur during the typical avian nesting season, February through mid-September) and that appropriate avoidance and minimization or mitigation plans be developed and required as conditions of approval for the Project.

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS? Would the Project interfere substantially with movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede use of native wildlife nursery sites?

COMMENT 2: Waterways and Riparian Resources

Section: Biological Resources Section, Pages 22 - 41; and Hydrology and Water Quality Section, Pages 59 – 64.

Issue: The IS/MND includes a discussion about the aquatic resources, sensitive natural communities, and wildlife movement corridors present within the Project area, however, site-specific mitigation measures are not included. The IS/MND states that no construction, absent watercourse crossings, will occur within the 100-year floodplain, but it is unclear whether the 100-year floodplain has been or will

be delineated. Although the Tuolumne County Community Resources Agency has notified CDFW under Fish and Game Code Section 1602, the IS/MND does not disclose if Project-related activities will impact riparian habitat associated with on-site waterways or wetlands. Further, the IS/MND does not include mitigation measures to protect these sensitive resources during construction activities or during future land use. It is the responsibility of the Lead Agency to ensure that mitigation measures listed in the IS/MND are feasible, measurable, implemented, and enforced.

Specific impact: Watercourses and associated riparian habitat are of extreme importance to a wide variety of plant and wildlife species. Riparian and wetland habitat and the species that depend on them would be impacted by Project activities. Impacts would result from dust, Project site run-off, soil erosion, sedimentation, release of pollutants, and impacts to the soil seed bank.

Evidence impact would be significant: Approximately 21% of Sierran species depend on riparian habitat, and many more utilize this habitat for foraging, water, shelter, and migration. Further, impacts from changes to the riparian habitat and land disturbances can result in impacts and changes to the aquatic system (Kondolf et al. 1996). The Project could substantially adversely affect riparian habitats by resulting in loss or further destruction of these vulnerable habitat types.

Recommended Potentially Feasible Mitigation Measure(s)

Recommended Mitigation Measure 2: CDFW recommends that the IS/MND be edited to require that all delineated surface waters, wetlands, and associated riparian habitat be protected with appropriate buffers, based on attributes of the waterway, the riparian community, and hill-slope gradients and that these buffers be included as an enforceable condition to protect all surface waters and associated riparian vegetation. CDFW recommends that within this setback, no construction, fencing, lighting, septic systems, or wells be allowed. The setback is advised to be recorded on the parcel map as Open Space with the specific limitations identified above.

II. Mitigation Measure or Alternative and Related Impact Shortcoming

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 USFWS?

COMMENT 3: Special-Status Avian Species

Section: Biological Resources Section, MM BIO-1, Page 39

Issue: The IS/MND indicates that the northern goshawk (NOGO) and California spotted owl (CSO), which meet the definition of rare or endangered under CEQA Guidelines section 15380, may occur in the Project area. MM BIO-1 proposes general nesting bird pre-construction surveys, and if active nests are found the Project proponent will notify CDFW and explain what mitigation measures will be implemented. MM BIO-1 also includes examples of measures that *may* be implemented. It is the responsibility of the Lead Agency to ensure that mitigation measures listed in the IS/MND are feasible, measurable, implemented, and enforced. Absent measures in the IS/MND meeting the CEQA Guidelines requirements, CDFW is unable to concur that potentially significant impacts to the species would be reduced to a less than significant level.

Specific impact: Without appropriate avoidance and minimization measures for NOGO and CSO, potential significant impacts associated with Project activities include loss of habitat, nest destruction or abandonment, loss or reduction of productivity, reduction in health and vigor of eggs and/or young, and direct mortality.

Evidence impact would be significant: Habitat for both species has been reduced in Sierra Nevada. Approximately 95% to 99% of the original ponderosa pine (*Pinus ponderosa*) old-growth forest has been lost in the Sierra Nevada, and habitat loss and degradation are the primary threats to both the CSO and NOGO (Shuford and Gardali 2008).

Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to NOGO and CSO, CDFW recommends conducting the following evaluation of the Project site and its vicinity and editing MM BIO-1 to include the following measures.

Recommended Mitigation Measure 3: If Project activities will occur during the typical avian nesting season (February through mid-September), CDFW recommends that potential nesting habitat for NOGO and CSO be surveyed by a qualified wildlife biologist, utilizing established protocols, prior to the commencement of Project activities. If nesting NOGO or CSO are found, CDFW recommends establishing a minimum ¼-mile no-disturbance buffer around active nests 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 this no-disturbance buffer may be implemented when there is compelling biological or ecological reason to do so. CDFW advises that any no

disturbance variance is informed through consultation with a qualified wildlife biologist and that CDFW be notified and consulted in advance of implementation of any buffer variance.

COMMENT 4: Special-Status Plant Species

Section: Biological Resources Section, MM BIO-3, Page 40

Issue: The IS/MND indicates that several special-status plants meeting the definition of rare or endangered under CEQA Guidelines section 15380 have the potential to occur in the Project area. MM BIO-3 proposes focused pre-construction surveys within the construction disturbance area, and in the event special-status plant species are found, requires the Project proponent to consult with CDFW for preservation and avoidance measures. MM BIO-3 also includes examples of measures that may be implemented. It is the responsibility of the Lead Agency to ensure that mitigation measures listed in the IS/MND are feasible, measurable, implemented, and enforced. Absent measures in the IS/MND meeting the CEQA Guidelines requirements, CDFW is unable to concur that potentially significant impacts to special-status plant species would be reduced to less than significant.

Specific impact: Without appropriate avoidance and minimization measures for special-status plants, potential significant impacts associated with subsequent construction include loss of habitat, loss or reduction of productivity, and direct mortality.

Evidence impact would be significant: Special-status plants identified in the IS/MND potential to occur in the Project area are threatened by recreational activities, grazing, logging, foot traffic, vehicles, development, non-native plants, herbicides, horticultural collection, reforestation, and habitat loss (CNPS 2018). Many of these threats have the potential to occur as a result of the Project.

Recommended Potentially Feasible Mitigation Measure(s)

To evaluate potential impacts to special-status plants, CDFW recommends conducting the following evaluation of the entire Project site and editing MM BIO-3 to include the following measures.

Focused Botanical Surveys

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.

Special Status Plant Avoidance

CDFW recommends that 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 CDFW recommends providing greater detail regarding alternate minimization and compensatory mitigation measures, such as reduced buffers, describing the intent and anticipated success of transplanting, and specifying success criteria for transplanted plants and related long-term protection and management that would occur under a conservation easement. In addition, please note that transplanting of a special-status species may require other authorization such as a Scientific Collecting Permit or, in the case of CESA-listed species, an Incidental Take Permit (ITP), pursuant to Fish and Game Code Section 2081(b), and include approval of the methods to be used in a transplanting project.

COMMENT 5: Artificial Lights

Section: Aesthetics Section, Page 13 - 14

Issue: The IS/MND states that all outdoor lighting will meet International Dark-Sky Association (IDA) standards. While CDFW supports to use of the IDA standards, these measures must be disclosed in the IS/MND and included as enforceable conditions of Project approval. Further, the artificial lighting discussion is only under the Aesthetics section, and it is unclear if outdoor artificial lighting impacts were also analyzed for potential impacts to biological resources. It is the responsibility of the Lead Agency to ensure that mitigation measures listed in the IS/MND are feasible, measurable, implemented, and enforced.

Specific impact: Project activities could result in disruption of wildlife behavior, inadvertent injury, or mortality.

Evidence impact would be significant: Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication (i.e., bird song; Miller 2006), determining when to begin foraging (Stone et al. 2009), thermoregulation behavior (Beiswenger 1977), and migration (Longcore and Rich 2004). Even aquatic species can be affected; movement of fish and amphibians can be negatively impacted by the presence of artificial lighting (Nightingale et al. 2006, Perry et al. 2008). Phototaxis, a phenomenon which results

in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004).

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Mitigation Measure or Alternative and Related Impact Shortcoming)

Recommended Mitigation Measure 4: CDFW recommends that the IS/MND include an analysis of artificial lighting as it relates to biological resources and incorporate enforceable mitigation measures to decrease the impacts of artificial outdoor lighting on wildlife species. Potentially feasible mitigation measures include: motion sensitive lighting; mounting light fixtures as low as possible to minimize light trespass; use of light fittings that direct and confine the spread of light downward; and use of long-wavelength light sources. In addition, CDFW recommends that lighting is not installed in ecologically sensitive areas (i.e., streams, wetlands, and habitat used by special-status species, such as nesting/roosting sites and riparian corridors) and the use of the white/blue wavelengths of the light spectrum be avoided.

III. Editorial Comments and/or Suggestions

Conversion of Timberlands:

The Agricultural and Forest Resources Section (pages 15 – 17) of the IS/MND states that approximately 20.1 acres of the Project site was burned during the 2013 Rim Fire, and that fire-killed trees have been removed. Other than this statement, the IS/MND does not disclose past timber harvesting on the Project site. Based on the Department of Forestry and Fire Protection's (CALFIRE) Emergency Notices of Timber Operations, it appears the above timber harvest operations were conducted under the CALFIRE Emergency No. 4-13EM-020-TUO, approved by CALFIRE on November 8, 2013. In addition, a CALFIRE Drought Mortality Exemption, No. 4-16EM-729, was approved by CALFIRE on August 22, 2016, and there is an active Non-Industrial Timber Management Plan (NTMP), No. 4-91NMTP-001, for the property. The NTMP is not disclosed in the IS/MND, and it is unclear if this Project is allowed under the conditions of the NTMP. Further, based on these past commercial timber operations on the property, it is clear the property meets the definition of timberland (as defined by Public Resources Code section 4526). The IS/MND briefly discusses a CALFIRE less than three-acre conversion exemption, however, the Project site and disturbance area are larger than three acres. It is unclear if a CALFIRE Timberland Conversion Permit, pursuant to Title 14 of the California Code of Regulations section 1100, has been approved for this Project.

CDFW recommends that the Project proponent consult directly with CALFIRE to determine if a Timberland Conversion Permit is required. CDFW recommends that this consultation, obtaining a Timberland Conversion Permit (if required), and all other CALFIRE requirements for the conversion of timberlands are included as enforceable conditions of the IS/MND and grading permit issued by the County.

Urban/Wildlife Conflict:

Several wildlife species that often result in urban/wildlife conflicts are present in the Project area. These species include, but are not limited to, black bear, mountain lion, coyote, deer, raccoon, skunk, and bat species. Direct and indirect human interactions with some of these species can result in human fatalities, injury, and loss of property, as well as wildlife injuries and fatalities. Animals that become either a nuisance or a threat because of inappropriate interactions with people often must be relocated or destroyed. CDFW recommends the IS/MND address the potential problems associated with urban/wildlife interactions and the potential associated impacts to wildlife, including impacts by additional human disturbance (i.e., pets, traffic, trash, etc.); and interference with migration/life history patterns (i.e., migration corridors, foraging habitat, etc.). CDFW also recommends the Project proponent develop a plan to avoid and minimize urban/wildlife conflicts, such as developing educational materials for guests and installing signage around ecologically sensitive areas.

Nesting Birds:

Habitat within the Project area likely provides nesting habitat for birds. MM BIO-1 includes conducting general pre-construction nesting bird surveys, however, in the event of detection, no enforceable mitigation measures are described. CDFW encourages Project implementation occur during the avian non-nesting season. However, if ground-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as 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 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, odors, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends a qualified biologist conduct a survey to establish a behavioral baseline of

all identified nests. Once construction begins, CDFW recommends 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 250-foot no-disturbance buffer 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.

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 California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed 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: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

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).

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CONCLUSION


CDFW appreciates the opportunity to comment on the IS/MND to assist the Tuolumne County Community Resources Agency in identifying and mitigating Project 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>).

Questions regarding this letter or further coordination should be directed to Margarita Gordus, Senior Environmental Scientist (Specialist) at (559) 243-4014 Extension 236, or by email at Margarita.Gordus@wildlife.ca.gov.

Sincerely,



 Julie A. Vance
Regional Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento
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