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to SEATAC

from Greg Ainsworth, Director of Biological Resources and Land Management

subject RESPONSE TO SEATAC COMMENTS ON THE YOUNG NAK RETREAT CENTER

Introduction

This letter has been prepared as response to SEATAC comments provided between 2005 and 2010 on the Young Nak Retreat Center project. The following materials are attached to this letter in support of the response to comments.

- Figure A, CALVEG Map (2002-2003) (ESA, December 2011)
- Figure B, CALVEG Map (1977-1979) (ESA, December 2011)
- Figure C, Land Use Map (ESA, December 2011)
- Figure D, Bio Resource Map (ESA, December 2011)
- Figure E, Vegetation and Tree Impacts Map (ESA, December 2011)
- Figure F, Jurisdictional Resources (ESA, January 2012)
- Figure G, Site Plan with Vegetation and Protected Oak Trees (ESA, January 2012)
- REVISED Master Site Plan (with and without vegetation) (Richard Brinser Architect Inc., January 2, 2012)
- REVISED Lighting Plan (Richard Brinser Architect Inc., December, 2011)
- REVISED Grading Plan (Hovell & Pilarski Engineering, Inc., December, 2011)
- REVISED Fuel Modification Plan and Landscape Plan (L. Newman Design Group, December, 2011)
- REVISED Wastewater Collection and Disposal System Report (WREA, December 22, 2011)
- REVISED On-Site Wastewater System Plan (WREA, December 22, 2011)
- Private Sewage System Percolation Test Results (Professional Geotechnical Consultants Inc., December 5, 2008)
- Domestic Water System Report (WREA, July 15, 2008)
- Hydrology and Groundwater Quality Report (Integrated Water Resources Inc., November 15, 2006)
- Young Nak Retreat Center ADEIR, Section 5.5 Biological Resources (Impact Sciences, November 2006)
- Young Nak Retreat Center Biota Report (Impact Sciences, Revised December 2007)
- Resume – Greg Ainsworth, Director of ESA's Southern California Biological Resources and Land Management Group

Methods

All responses have been provided by the applicant's team of technical specialists. The following specialists provided responses to SEATACs comments:

- Biological Resources – ESA, Greg Ainsworth - Director of Biological Resources and Land Management
- Site Design - Richard Brinser Architect, Inc., Richard Brinser – Architect/Owner
- Grading Plan and Civil Engineering - Hovell & Pilarski, Debbie Naves - Land Surveyor, Project Manager, Engineering, Inc.
- Hydrology (Wastewater, Stormwater and Groundwater) – WREA, Barney Caudill - Senior Project Manager
- Fuel Modification Plan and Landscape Plan – L. Newman Design Group, Mike Loza – Landscape Architect
- 2011/2012 Resource Mapping (GIS) – ESA, Coral Welton - Senior GIS Analyst

On December 29, 2011, ESA biologist, Greg Ainsworth, conducted a reconnaissance at the project site in order to respond to SEATAC comments. It should be noted that Mr. Ainsworth worked at Impact Sciences while the initial Biota Report and ADEIR was prepared; however, his role was limited to surveying oak trees in support of these documents. Nonetheless, because of the time Mr. Ainsworth spent on the site during the oak tree survey, he is familiar with the vegetation, habitats, and overall condition of the site, making him capable of providing responses to SEATACs comments that pertain to biological resources and the SEA. The project site was photographed from various locations during this site visit, which are provided in this response letter.

Summary of Revised Project Features

The project site has been consolidated to lessen impacts to biological resources, including vegetation and protected oak trees. This has been achieved by removing the open amphitheater and pedestrian foot paths from the project design and positioning the parking area within a previously disturbed area. This helped reduce the amount of grading outside of existing disturbed areas and thus reducing the number of oak trees that would be impacted.

Several additional revisions have been made to the project design to address the comments provided by SEATAC and to reduce the level of impacts on the environment, including reducing impacts to biological resources and the SEA. Below is a summary of these improvements made to the project design to lessen the disturbance footprint and the level of impacts on the environment and the SEA. Some revisions have been made to the project design based on these prior SEATAC comments:

- Reduced disturbance footprint.
    - majority of project features will occur on previously disturbed areas (e.g., parking lot, cafeteria, pool, and 24 room dormitory)
    - amphitheater and foot paths removed from project design
    - lesser impacts on native plant communities than previous design
- Revised open drainage structure approved by Los Angeles County.
- An Access and Fire Water Plan has been approved by the LA County Fire Department.
- The landscape plant palette consists of locally indigenous plants and no species identified in the County of Los Angeles Fuel Modification Guidelines-Appendix III Undesirable Plant List (July 2011) are included in the landscape palette.
- A wood rail fence has been added as a design feature to allow wildlife movement through the project site while prohibiting access to sensitive areas that include willow riparian woodland, rush sedge mixed grassland and a sag pond. Additionally, an informational kiosk will be constructed on the site to educate visitors on the natural resources that exist in undeveloped areas and the reason it is important to stay out

of these sensitive area. Information on the importance of staying on designated trails when using Forest Service designated trails will also be provided.

Responses to SEATAC Issues

Responses are organized based on the Issue No and date of the SEATAC comment.

Issue No 1a (2005.03.07):
"Proofread for spelling and grammar"

Response:
The 2007 Biota Report was reviewed for spelling and grammar and no mistakes were recognized. The revised Administrative Draft Environmental Impact Report (ADEIR) for the proposed project will be reviewed for quality and consistency prior to submittal.

Issue No 1b (2005.03.07):
"Taxa identification to species"

Response:
All genus, species, and subspecies are accurately identified in the 2007 Biota Report. The revised ADEIR will include all taxa identified to species.

Issue No 1c (2005.03.07):
"Give subspecies for *Artemisia tridentata*"

Response:
Artemisia tridentata is the correct Genus and Species of the Great Basin sage brush recorded on the site. Subspecies can be confirmed in the field, if necessary. *Artemisia tridentate* is not a special-status species or otherwise recognized rare or declining plant species.

Issue No 2a (2005.03.07):
"Impact assessment must include 200 ft. fuel mod"

Response:
Figure E, Vegetation and Tree Impacts Map provides the acreages of each plant community that occurs within the limits of the Fuel Modification Area. The following is a summary of areas with the limits of Fuel Modification:

- Developed-Disturbed: 6.45 ac.
- Interior Live Oak Woodland: 0.59 ac.
- Mixed Chaparral: 0.05 ac.
- Mixed Grassland: 2.60 ac.
- Pine Oak Woodland: 5.05 ac.
- Rush Sedge Mixed Grassland: 0.20 ac.
- Scrub Oak Chaparral: 1.24 ac.
- Willow Oak Woodland: 0.95 ac.
- Willow Riparian Woodland: 0.00 ac.

Issue No 2a (2005.03.07):
"Acreage citations must be consistent"

Response:
Figure E, Vegetation and Tree Impacts Map provides the acreages of each vegetation type that would be impacted by the proposed project. The number of living oak trees protected under the Los Angeles County Oak Tree Ordinance that would be removed or impacted is also provided in Figure E.

Issue No 3a, 19 (2005.03.07); Issue No 24a (2008.02.04):
"Reassess impacts on 2 Willow Flycatchers; could be nesting? Impact on migrating Willow Flycatcher is significant".
"Re-assess impacts on Willow Flycatcher (Empidonax traillii extimus) Impact on migrating Willow Flycatcher is significant."

Response:
As described in the 2007 Biota Report, two individuals were observed on the site during USFWS protocol surveys (Impact Sciences 2004). No evidence of nesting was observed and the observed birds are believed to be late migrants. The observed willow flycatchers could not be positively identified as belonging to the southwestern form of willow flycatcher.

No direct impact is proposed within, or immediately adjacent, to potentially suitable habitat for nesting or migrating willow flycatcher, which includes woodland areas with willow trees. Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, Section 5.5 Biological Resources includes measures for avoiding breeding birds and bird nests during construction related activities. Moreover, the area where two migrating willow flycatchers were observed in 2004 would be fenced to inhibit access into this area by users during operation of the retreat center.

Issue No 4a (2005.03.07); Issue No 21 (2008.02.04):
"Assess CA southern spotted owl in paragraphs. Consult Forest biologist for information."

Response:
As described in the 2007 Biota Report and the ADEIR, the spotted owl has been documented nesting within 1 mile of the project site and the project site could be within the home range of a nesting pair. The project site provides suitable nesting and foraging habitat for this species.

Figure D, Bio Resource Map, includes the location of sensitive biological resources based on a recent query of the USDA Forest Service and CNDDB in December, 2011. This recent database search identifies three California spotted owl protected activity centers (PACs) within approximately one-mile to the south-southwest of the project site. According to the USDA Forest Service (http://www.fs.fed.us/r5/snfpa/final-seis/vol1/appendix-a/pacs/cso.html), California spotted owl activity centers are designated based upon the latest documented nest site, the latest known roost site when a nest location remains unknown, and as a central point based upon repeated daytime detections when neither nest nor roost locations are known for all territorial owls.

Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

Moreover, the lighting plan has been revised to show nighttime lighting for on-site safety only. Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would

not be expected to interfere with the breeding or nesting cycle of the California spotted owl or any of the USDA Forest service designated PACs.

Issue No 4b (2005.03.07):
"Assess *Diadophis punctatus* in paragraphs."

Response:
This species is briefly discussed in paragraph format on page 5.5-33 of the ADEIR. Mitigation Measure Bio-12a described on page 58 of the Biota Report and Mitigation Measure 5.5-10(a) on page 5.5-35 of the ADEIR, Section 5.5 Biological Resources includes measures for avoiding San Bernardino ringneck snake during construction activities, which includes capture and relocating animals to a suitable area located outside of the construction zone.

Issue No 5 (2005.03.07):
"Jurisdictional delineations should be presented as consistent with CDFG specifications."

Response:
As stated in the ADEIR under Section 5.5.3.1.3 Jurisdictional Wetland Delineation, a jurisdictional wetland delineation was conducted by Impact Sciences on August 3, 2004. Published Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG) protocols were utilized in the field and the location of riparian/wetland resources potentially under the jurisdiction of these agencies was delineated with a sub-meter accurate GPS unit.

Figure 5.5-2, Jurisdictional Areas Within the Project Boundary of the ADEIR, shows the areas on the site expected to fall under the jurisdiction of these agencies. A total of 5.12 acres were delineated as being under the jurisdiction of the ACOE, CDFG, and RWQCB, including the sag ponds, the willow riparian woodland and adjacent rush-sedge wetland, portions of the willow-oak woodlands, and two rush-sedge wetlands in the northwest portion of the site.

There is an additional 0.96 acre of adjacent riparian habitat, but not hydrophytic, vegetation occurs on the project site that is under the jurisdiction of CDFG but not the ACOE or RWQCB. There are also several small areas of isolated rush-sedge wetlands in the northwest portion of the site under RWQCB jurisdiction (0.11 acre), which should not be considered adjacent to the riparian corridor because they are not dependent on the riparian corridor for water and do not supply water to the corridor. The results of the wetland delineation are subject to verification by the ACOE.

Issue No 6a (2005.03.07):
"Address the water overdraft potential of the planned retreat at peak capacity; hydrology report should be made available to SEATAC."

Response:
A hydrogeologic and groundwater quality report was prepared in 2006 to address the impacts to the (then) existing well. Based upon the analysis, "no significant impacts to groundwater, water quality or the riparian wetland habitat were anticipated."

Since the date of the report, the existing well has become unusable do to collapse of the aged physical well structure. The conclusions of the 2006 report shall be considered for the development of a new well that will be located in the same general location of the previous well. The Report by Integrated Water Resources, Inc. is attached. A new hydrogeological investigation will be made prior to the development of the new well. Currently, water supply to the Retreat is being met by a new well installed near the southern boundary of the property. The well meets the Los Angeles County Department of Health Services criteria for potable water.

WREA published a Domestic Water System Report dated July 15, 2008. That report is attached and addresses Maximum Day Demand based on the planned attendance to the Retreat.

Issue No 6b (2005.03.07):
"Assess water potential for fighting fires on retreat."

Response:
Young Nak Retreat has been approved by the Los Angeles County Fire Department for construction of a 66,000-gallon water storage tank for fire protection purposes.

Issue No 6c (2005.03.07):
"Assess septic capacity and protection of natural water features onsite; Wastewater Collection and disposal system report should be made available to SEATAC."

Response:
The Retreat plans to construct an advanced wastewater treatment unit. The water will be treated to secondary standards and will comply with the Los Angeles Regional Water Quality Control Board's water quality requirements to be outlined in a Waste Discharge Requirements (WDR) permit.

See attached Wastewater Collection and Disposal System Report by WREA (WREA, December 22, 2011).

Issue No 7a (2005.03.07):
"What is plan to limit access into the National Forest?"

Response:
The existing access gate will be locked with access granted during daylight hours, with educational information requesting visitors to stay on the existing trails. An informational kiosk will be construction on the site to educate visitors on the natural resources that exist in undeveloped areas and the reason it is important to stay out of these sensitive area. Information on the importance of staying on designated trails when using Forest Service designated trails will also be provided.

Issue No 7b (2005.03.07):
"What is the impact of unlimited access plan?"

Response:
The project proponent does not intend to allow unlimited access onto Forest Service land. The existing access gate will be locked with access granted during daylight hours, with educational information requesting visitors to stay on the existing trails. The project design includes open fencing to detour visitors from accessing the sag pond area along the northern boundary of the property. This open rail fencing will not impeded local wildlife movement through the site.

Issue No 7c (2005.03.07):
"What is fuel mod overlap into National Forest?"

Response:
The fuel modification zone extends slightly off-site to the west and south. The land to the south of the project boundary consists of USDA Forest Service land. The County has indicated that no fuel modification is required off-site.

Issue No 8 (2005.03.07):

“Habitat notation should be "woodland, not "senescent woodland”

Response:
“Senescent” has been removed from the Biota Report and ADEIR.

Issue No 9 (2005.03.07):
“Mammal survey is inadequate. Include neighbor accounts of mammals sighted.”

Response:
Please provide justification for reason that mammal survey is inadequate and why neighbor accounts of mammals sighted should be included in the analysis. The Significant Ecological Areas Technical Advisory Committee (SEATAC) Procedures and Guidelines (March, 2004) states that Biological Constraints Analyses and Biota Reports must be prepared by a biologist selected from the Department of Regional Planning’s certified list of biologists. Baseline data collected in support of the BCA and Biota Report should be compiled by a qualified biologist as well. If the neighbors are not considered a qualified biologist, their accounts of species observed can be noted, but failure to interview unqualified neighbors does not deem the mammal survey inadequate.

Issue No 10a (2005.03.07):
“Needs a land use map of region and surroundings. This should show any preserved public land such as National Forest.”

Response:
Figure C, Land Use Map has been prepared to depict land use of the region and surroundings, and shows preserved public land such as National Forest and designated Open Space. Figure 8, Regional Open Space Areas in the 2007 Biota Report also depicts open space areas in the region.

Issue No 10b (2005.03.07):
“Needs a map that shows regional vegetation communities and contiguity with habitats onsite.”

Response:
Figure A, CALVEG Map (2002-2003) and Figure B, CALVEG Map (1977-1979) were prepared to depict regional vegetation communities and contiguity with habitats onsite. These maps were prepared based on CALVEG GIS data provided by the USDA Forest Service.

Issue No 11 (2005.03.07):
“Wildlife movement discussion is inadequate. The San Andreas Fault (SAF) is regarded as the prime focus for movement in the area, and this must be presented. The sag ponds onsite are on the SAF.”

Response:
The San Andreas Fault (SAF) provides wildlife movement opportunities. The sag pond located on the northern boundary of the site was created by the SAF.

As stated in the ADEIR, Section 5.5.5.6 Wildlife Movement Corridors “Value of the project site as a wildlife movement pathway is limited. The site is partially developed and is actively used as a retreat center. However, the project site does provide wildlife movement value. Specifically, given the project site’s location adjacent to the Angeles National Forest, wildlife could move across the site and into the Forest. Furthermore, less disturbed habitats on the site, including willow riparian woodland along the northern project boundary, willow-oak woodland along the eastern project boundary, and pine-oak woodland along the western project boundary, provide potential movement pathways for locally occurring wildlife. Riparian habitat along the northern project boundary is considered of particular importance as it is within the San Andreas rift zone, which is considered to be a major habitat connection by the Los Angeles County Significant Ecological Area Technical Advisory

Committee. Although vegetative cover within the rift zone has been fragment by past development, it serves an important function as a wildlife movement corridor." "The project site is surrounded by undeveloped land with vegetative cover conducive to wildlife movement. "

In addition, the revised fencing plan as shown in the REVISED Master Site Plan will consist of open rail fencing that will allow wildlife to move through the site while creating a barrier intended to discourage users of the retreat from accessing the sag pond area.

Issue No 12a (2005.03.07):
"Mountain Yellow-legged frog (MYF) formerly was distributed in site elevation. Re-assess possibility for MYF."

Response:
According to the Mountain Yellow-Legged Frog Website (http://www.mylfrog.info/naturalhistory/distribution html), on September 15, 2010, the California Fish and Game Commission accepted a petition from the Center for Biological Diversity to list all populations of the mountain yellow-legged frog (*Rana muscosa* and *Rana sierrae*) as "endangered" under the California Endangered Species Act. As such, on October 1 both species were listed as "candidate" species and will be managed as "endangered" until the final decision on whether to list the species is made. According to the website, the information on the website site is based on the latest available scientific studies, but also includes the scientific opinions of its author, Dr. Roland Knapp.

The range of the mountain yellow-legged frog is restricted to montane regions of California and adjacent Nevada. Throughout this range, mountain yellow-legged frogs historically were found in lakes, ponds, marshes, meadows, and streams at elevations of 4,500-12,000 feet (1,370-3,660 m), and often existed at remarkably high densities (http://www.mylfrog.info/naturalhistory/distribution.html).

Rana muscosa has been found from the southern Sierra Nevada to the Transverse and Peninsular Ranges in southern California. In the Sierra Nevada, *R. muscosa* occurred from the divide between the Middle Fork and South Fork of the Kings River (Monarch Divide, Cirque Crest, Mather Pass) south to at least Taylor Meadow in southern Tulare County. All known Sierran localities are on the west slope. An isolated population was present on Breckenridge Mountain in Kern County. In the Transverse and Peninsular Ranges, populations were found in the San Gabriel, San Bernardino, and San Jacinto Mountains, and on Palomar Mountain. In these ranges, *R. muscosa* was found primarily in fast-flowing streams (http://www.mylfrog.info/naturalhistory/distribution.html).

Peter H. Bloom (Bloom Biological Consultants) conducted surveys for California red-legged frog on the project site pursuant to the accepted USFWS survey protocol for this species. Searches and/or habitat evaluations were also conducted for yellow-blotched salamander, Tehachapi slender salamander, western spadefoot toad, arroyo toad, foothill yellow-legged frog, mountain yellow-legged frog, southwestern pond turtle, coast horned lizard, silvery legless lizard, and San Bernardino ringneck snake. The surveys for all these species were conducted on July 26, 30, and 31, 2003.

The project site is located at an elevation below the known minimum elevation requirement of the mountain yellow-legged frog. Moreover, *R. Muscosa* has been found in habitats that consist of fast-flowing streams, which are absent in the project area. Because suitable habitat conditions for supporting mountain yellow-legged frog are absent and because this species was not detected during protocol-red-legged frog surveys, this species is not expected to occur on the project site and no impacts to this species are anticipated.

Issue No 12b (2005.03.07); Issue No 20 (2008.02.04):
"Re-assess possibility for Western Spadefoot."

Response:

Page 5.5-32 states that "the two ponds on the project site provide suitable breeding habitat for this species and, if present, this species could aestivate in surrounding areas. The proposed project does not include any direct impacts to the ponds or adjacent habitat. Therefore, impacts to this species would be less than significant."

Suitable aestivation habitat does not occur in the areas that are proposed for development. Moreover, the fencing and signage proposed as part of the project design would prohibit visitors from entering areas where western spadefoot may occur.

Issue No 12c (2005.03.07):
"Re-survey and assess for possible ground-squirrel"

Response:
It is assumed that this comment was made in regards to ground squirrel burrows serving as habitat by burrowing owls. On December 29, 2011, ESA's biologist Greg Ainsworth re-visited the project site to assess the current conditions in order to properly address SEATAC's comments. During this assessment, the grassland areas were inspected for presence of ground-squirrel burrows and sign of burrowing owl. No suitable-size ground squirrel burrows (4"-8" diameter) or man-made structures such as open pipes and cement culverts that could be used as burrow sites were observed.

Issue No 12d (2005.03.07):
"Re-assess Cooper hawk potential (could overwinter)."

Response:
As described in Table 5.5-3 on page 5.5-17 of the ADEIR, the woodlands on the project site provide suitable nesting and foraging habitat for Cooper's hawk; however, this species not observed on the site during site surveys.

Cooper's hawk could overwinter in the woodland areas on the project site. However, the proposed project would not remove a significant amount of woodland when considering the amount of woodland that will preserved. Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

Moreover, the lighting plan has been revised to nighttime lighting for on-site safety only. Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would not be expected to interfere with the overwintering or breeding populations of Cooper's hawk.

Issue No 12e (2005.03.07):
"Re-assess purple martin potential."

Response:
As described in Table 5.5-3 on page 5.5-19 of the ADEIR, the woodlands on the project site provide suitable nesting and foraging habitat for purple martin; however, this species not observed on the site during site surveys. However, during the December 21, 2011 site visit, several woodpeckers were observed, which further substantiates that there is suitable habitat for supporting foraging or breeding purple martins.

Purple martin's could breed and nest in the woodland areas on the project site. However, the proposed project would not remove a significant amount of woodland when considering the amount of woodland that will preserved. Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

Moreover, the lighting plan has been revised to nighttime lighting for on-site safety only. Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would not be expected to interfere with the overwintering or breeding populations of Purple martin.

Issue No 13a (2005.03.07):
"Re-assess yellow-blotched salamander potential."

Response:
As indicated in Table 5.5-3 on page 5.5-16 of the ADEIR, yellow-blotched salamander generally occurs in forests, well-shaded canyons, oak and conifer woodlands, mature chaparral below 7,300 feet. This species is active in the evening during the rainy season and later in the summer at higher elevations, feeding on small insects and other invertebrates. They retreat underground during the summer (Hansen 2000). They are often associated with the Tehachapi slender salamander, and other, more common species.

This species was not observed on the site during amphibian surveys conducted in 2003 (Bloom 2003). This species has a low potential to occur on the site in association with the margins of the ponds and associated riparian woodland, wetlands, and moist north-facing slopes. However, the proposed project has been re-designed to avoid wetland and riparian habitats thus avoiding impacts to potentially suitable habitat (i.e., moist areas) for this species. Therefore, the proposed project would not be expected to have a substantial adverse effect on yellow-blotched salamander; consequently, impacts to this species would be less than significant.

Issue No 1 (2005.03.07); Issue No 1a and 22 (2008.02.04):
"Redo CNDDB table." "Reasses CNDDB table. Sensitive species not valued correctly." Clearly distinguish spp. observed and spp. possible."

Response:
To verify and update the plants and wildlife recorded in the region, ESA conducted literature searches and database reviews in December, 2011. Specifically, the most recent versions of the California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants were reviewed for the U.S. Geological Survey (USGS) 7.5-minute quadrangle on which the project site is located (Burnt Peak) and the eight surrounding quadrangles (La Liebre Ranch, Neenach School, Fairmont Butte, Lake Hughes, Green Valley, Warm Springs Mountain, Whitaker Peak, and Liebre Mountain). The results were compared to the database search generated by Impact Sciences, Inc. for the 2007 Biota Report (Table 5.5-1 on page 5.5-10 and Table 5.5-3 on page 5.5-16 of the ADEIR).

New species *not* covered in the 2007 Biota Report and ADEIR are included in **Table 1** below. Species previously covered in the 2007 Biota Report and ADEIR were reevaluated based on suitable habitat conditions and current protective status. The updated species table is presented in **Tables 2 and 3**. These updated tables will be included in the ADEIR and the potential for occurrence will be highlighted in the tables for each species.

*Species identified in Table 1 are not repeated in Tables 2 and 3.

Table 1: Special-Status Species Potentially Occurring on the Project Site Based on December 2011 Database Search

Species	Status	Habitat	Discussion of Potential Occurrence

Species	Status	Habitat	Discussion of Potential Occurrence
Plants			
Darwin rock-cress *Arabis pulchra* var. *munciensis*	BLM, CSC 2.3	Limestone within chenopod scrub, and Mojavian desert scrub. Occurs in elevations ranging from 3,600 ft. to 6,800 ft.	**Not Expected.** Although the project site is within the elevation range of this species, suitable habitat for this species is absent from the project site. This species not observed during focused botanical surveys conducted in 2003 and 2005 (See ADEIR Section 5.5.3.1.2, page 5.5-2).
Peirson's morning-glory *Calystegia peirsonii*	4.2	Chaparral, coastal scrub chenopod scrub, cismontane woodland, and lower montane coniferous forest. Often found in disturbed areas or along roadsides or in grassy, open areas. Occurs in elevations ranging from 1,280 ft. to 4,800 ft. Blooms April – June.	**Low Potential.** Suitable habit is present. This species not observed during focused botanical surveys conducted in 2003 and 2005 (See ADEIR Section 5.5.3.1.2, page 5.5-2).
Parry's spineflower *Chorizanthe parryi* var. *parryi*	FSS, BLM, 1B.1	Dry slopes and flats; sometimes at the interface of two vegetation types, such as chaparral and oak woodland. Requires dry, sandy soils. Occurs in elevations ranging from 130 ft. to 6,000 ft. Blooms April – June.	**Not Expected.** The project site lacks suitable habitat for this species. This species not observed during focused botanical surveys conducted in 2003 and 2005 (See ADEIR Section 5.5.3.1.2, page 5.5-2).
Clokey's cryptantha *Cryptantha clokeyi*	BLM, 1B.2	Sandy or gravelly soils in Mojavean desert scrub. Occurs in elevations ranging from 2,380 ft. to 4,480 ft. Blooms in April.	**Not Expected.** The project site lacks suitable habitat for this species. This species not observed during focused botanical surveys conducted in 2003 and 2005 (See ADEIR Section 5.5.3.1.2, page 5.5-2).
Mammals			
Western mastiff bat *Eumops perotis californicus*	BLM, CSC	Inhabits many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral. Roosts in crevices in cliff faces, high buildings, trees and tunnels.	**Moderate Potential.** This species may forage within the sag pond area and within the open grasslands. Trees and woodland areas could provide suitable roosting habitat.
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	CSC	Inhabits intermediate canopy stages of shrub habitats and open shrub, herbaceous and tree edges. Also, occurs in grasslands, agricultural fields or sparse coastal scrub	**Not Expected.** San Diego black-tailed jackrabbit occurs only on the coastal side of the southern California mountains where suitable jackrabbit habitat is less common (Stephenson and Calcarone 1999).
Southern grasshopper mouse *Onychomys torridus ramona*	CSC	Inhabits desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover.	**Not Expected.** The project site lacks suitable habitat for this species. Online resources indicate that this species generally occurs at lower elevations.

KEY:

Federal
FE: Federally Endangered
FD: Federally delisted
FT: Federally Threatened
BCC: Bird of Conservation Concern
BLM: BLM Sensitive:
FSS: Forest Service Sensitive

State
CE: California Endangered
CFP: California Fully Protected
CDF: California Department of Forestry Sensitive
CSC: California Special Concern species

Other
ABC: American Bird Conservancy Green List
AWL: Audubon Watch List
R: Considered rare by professional entomologists
USBC: United States Bird Conservation Watch List
WBWG: Western Bat Working Group

CNPS
List 1B: Plants Rare and Endangered in California and elsewhere
List 2: Plants Rare, Threatened, or Endangered in California, but more common elsewhere
List 4: Plants of Limited Distribution – A Watch List

Table 2: Special-Status Plant Species Potentially Occurring on the Project Site Based on December 2011 Database Search

Species	Status	Habitat	Blooming Period	Occurrence
Kusche's sandwort *Arenaria macradenia* var. *kuschei*	1B	Chaparral (openings, granitic)	Perennial herb June–July	**Not Expected:** Not observed during appropriately timed surveys (Bruyea 2003, Miller 2005); some suitable habitat present.
Nevin's barberry *Berberis nevinii*	FE/CE/ 1B	Chaparral, cismontane woodland, coastal scrub, riparian scrub; on steep, north-facing slopes or in low grade sandy washes	Shrub (evergreen*)* March–April	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005); marginal habitat present as the site lacks steep slopes and sandy washes.
Slender mariposa lily *Calochortus clavatus* var. *gracilis*	1B	Chaparral, coastal sage scrub; shaded foothill canyons; often on grassy slopes	Perennial herb March–May	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005); some suitable habitat present.
Palmer's mariposa lily *Calochortus palmeri* var. *palmeri*	1B	Chaparral, lower montane coniferous forest, meadows and seeps/mesic	Perennial herb May–July	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Bruyea 2003, Miller 2005); some suitable habitat present.
Peirson's morning glory *Calystegia peirsonii*	4	Chaparral, chenopod scrub, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland	Perennial herb May–June	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005); suitable habitat present; documented 0.5 mile north of the project site at White Oaks Ranch.
San Fernando Valley spineflower *Chorizanthe parryi* var. *fernandina*	FC/CE/1 B	Coastal Scrub (sandy)	Annual herb April–June	**Not Expected:** Not observed during appropriately timed survey (Impact Sciences 2003); marginal habitat present.
Round-leaved filaree *Erodium macrophyllum*	2	Cismontane woodland, valley, and foothill grassland/clay	Annual herb March–May	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005); project site lacks characteristic soils.
Mexican flannelbush *Fremontodendron mexicanum*	FE/CR/ 1B	Closed-cone coniferous forest, chaparral, cismontane woodland; creek borders or dry canyons; sometimes Gabbro soils; 30–1,650 feet; and chaparral habitat	Shrub evergreen March–June	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005) and would have been identifiable during all the site visits. A single, though questionable, occurrence has been documented north of the project area in Kern County; however debate exits as to the validity of the record.

Species	Status	Habitat	Blooming Period	Occurrence
San Gabriel bedstraw *Galium grande*	1B	Cismontane woodland, chaparral, broad-leafed upland forest, lower montane coniferous forest; open chaparral and low, open oak forest; rocky slopes	Shrub deciduous January–July	**Not Expected:** Not observed during appropriately timed surveys (Impact Sciences 2003, Miller 2005); project site lacks characteristic rocky slopes.

Table 3: Special-Status Wildlife Species Potentially Occurring on the Project Site Based on December 2011 Database Search

Species	Status	Habitat	Discussion of Potential Occurrence
Insects			
Bright blue copper *Lycaena heteronea clara*	R	Most strongly associated with flat-top buckwheat (*Eriogonum fascilatum*) and sulphur flower (*Eriogonum umbellatum*). Males frequently perch on great basin sagebrush (*Artemisia tridentata*).	**Low Potential.** No individuals were observed on the project site during the butterfly survey conducted in 2003, but the larval host plant is present (Bruyea 2004). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Green blue *Icaricia lupini chlorina*	R	Utilizes various buckwheat species (*Eriogonum* sp.), but most strongly associated with flat-top buckwheat (*Eriogonum fascilatum*).	**Low Potential**. No individuals were observed on the project site during the butterfly survey conducted in 2003, but the larval host plant is present (Bruyea 2004). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Amphibians			
Yellow-blotched salamander *Ensatina eschscholtzii croceator*	CSC, FSS, BLM	Forests, well-shaded canyons, oak and conifer woodlands, mature chaparral below 7,300 feet. This species is active in the evening during the rainy season and later in the summer at higher elevations, feeding on small insects and other invertebrates. They retreat underground during the summer (Hansen 2000). They are often associated with the Tehachapi slender salamander, and other, more common species.	**High Potential**. This species prefers areas with considerable number of logs and moist areas. A specimen was collected nearby in Kings Canyon, and is stored at Los Angeles County Museum of Natural History. Not observed, but has high potential to occur on site in association with the margins of the ponds, wetlands, and north facing slopes (Bloom 2003). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
California red-legged frog *Rana aurora draytonii*	FT, CSC	Inhabits lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11 to 20 weeks of permanent water for larval development. Must have access to aestivation habitat.	**Low Potential.** The two ponds on the site provide highly suitable habitat. The species was not observed on the site during USFWS protocol-level surveys conducted in 2003 (Bloom 2003). There are no known red-legged frog populations in the project area from which frogs could disperse to the project site (CNDDB). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Western spadefoot *Spea hammondii*	CSC, BLM	Occurs primarily in grassland situations, but occasional populations also occur in valley-foothill hardwood woodlands. Seasonal pools are essential for breeding and egg laying.	**Moderate Potential.** The sag ponds provide suitable breeding habitat; focused searches for this species have not been conducted. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Reptiles			
Silvery legless lizard *Anniella pulchra pulchra*	CSC, FSS	Inhabits sandy or loose loamy soils under sparse vegetation; susceptible to drying and must be in or near moist soil.	**Moderate Potential.** The project site contains suitable habitat for this species; not observed during site surveys, but the species can be difficult to detect (Bloom 2003). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Rosy boa *Charina trivirgata*	BLM, FSS	Habitats with a mix of brushy cover and rocky soil such as coastal canyons and hillsides, desert canyons, washes and mountains in desert and chaparral from the coast to the Mojave and Colorado Deserts.	**Moderate Potential.** Suitable habitat present and potentially occurs on the project site. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
San Bernardino ringneck snake *Diadophis punctatus modestus*	FSS	Inhabits open, relatively rocky areas, often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous vegetation.	**Moderate Potential.** Suitable habitat present and probably occurs on the project site (Bloom 2003). A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Coast patch-nosed snake *Salvadora hexalepis virgultea*	CSC	A low shrub structure of minimum density. Presumed to take refuge and perhaps overwinter in burrows or woodrat nests. Preys on whiptail lizards (*Aspidoscelis* spp.).	**Moderate Potential.** Marginal habitat is available though shrub cover is dense throughout most of the undisturbed areas of the site. Whiptail lizards observed on site. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Two-striped garter snake *Thamnophis hammondii*	CSC, FSS, BLM	This highly aquatic snake is found in or near permanent fresh water. Often found along streams with rocky beds and riparian growth.	**High Potential.** The willow riparian woodland and ponds provide suitable habitat for this species; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Coast horned lizard *Phrynosoma coronatum*	CSC, FSS, BLM	Forages on the ground in open areas, particularly in dry, sandy washes, sage scrub, and chaparral with rocky or shallow sandy soils to 6,300 feet in elevation, where it feeds on native ants.	**High Potential.** Known to occur in the general area, but not observed on the site (Bloom 2003). Could occur in association with on-site scrub oak chaparral. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Birds			
Cooper's hawk (nesting) *Accipter cooperii*	CSC	Inhabits primarily open, interrupted, or marginal woodlands. Nests mainly in riparian groves of deciduous trees in canyon bottoms on river floodplains. Also nests in coast live oak.	**Moderate Potential.** The woodlands on the project site provide suitable nesting and foraging habitat; not observed on the site during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Tricolored blackbird (nesting colony) *Agelaius tricolor*	BCC, CSC, USBC, AWL, BLM, ABC	Highly colonial species. Requires open water, protected nesting substrate, and foraging areas with insect prey within a few km of the colony. Greatest concentrations are in the Central Valley and vicinity. Largely endemic to California.	**Moderate Potential.** The emergent vegetation associated with the pond provides some suitable nesting habitat; not observed on the site during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Long-eared owl (nesting) *Asio otus*	CSC	Inhabits riparian bottomlands grown to tall willows and cottonwoods. Also occurs in belts of live oak paralleling stream courses. Requires adjacent open land with abundant mice. Utilizes old nests of crows, hawks, or magpies for breeding.	**Moderate Potential.** The woodlands on the project site provide suitable nesting habitat; not observed on the site during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Lawrence's goldfinch (nesting) *Carduelis lawrencei*	BCC, USBC, AWL, ABC	Typical habitats include valley and foothill hardwood, valley and foothill hardwood-conifer, and, in Southern California, desert riparian, palm oasis, pinyon-juniper, and lower montane habitats. Breeds in open oak or other arid woodland and chaparral, near water.	**Moderate Potential.** The project site provides some suitable nesting habitat; not observed on the site during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Northern harrier (nesting) *Circus cyaneus*	CSC	Inhabits coastal salt and freshwater marshes. Nests and forages in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge. Nests are large mounds of sticks in wet areas.	**Moderate Potential.** The wetlands on the site provide suitable nesting habitat; not observed on the site during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Vaux's swift (nesting) *Chaetura vauxi*	CSC	Redwood, Douglas fir and other coniferous forests. Nests in large hollow trees and snags, often in large flocks. Forages over most terrains and habitats but shows a preference for foraging over rivers and lakes.	**Moderate Potential.** Potential nesting habitat is present in pine trees on site. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Yellow warbler (nesting) *Dendroica petechia*	--	Found in association with dense riparian habitats throughout the lowlands of California. Prefers dense riparian woodlands and scrub habitat for nesting and foraging, though it will use open riparian areas during migration periods.	**Moderate Potential.** The willow and willow-oak woodlands provide suitable nesting habitat for this species; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report. However, this species is no longer listed by CDFG as a CDC species.
White-tailed kite (nesting) *Elanus leucurus*	BLM, CFP	Inhabits rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodlands. Utilizes open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	**Moderate Potential**. The project site provides suitable nesting habitat; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Southwestern willow flycatcher (nesting) *Empidonax traillii extimus*	CE, FE, FSS, USBC, AWL, ABC	Willows or other shrubby habitat near streams, ponds, or wet meadows.	**Known to Occur.** The willow and willow-oak woodlands provide suitable nesting habitat for this species. Two individuals were observed on the site during USFWS protocol surveys (Impact Sciences 2004). No evidence of nesting was observed and the observed birds are believed to be late migrants. The observed willow flycatchers could not be positively identified as belonging to the southwestern form of willow flycatcher. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. Protocol-level nesting surveys for this species have not been conducted, however, the potential for this species to nest on the project site remains low.
California horned lark *Eremophila alpestris actia*	CSC	Inhabits a variety of open habitats, usually where trees and large shrubs are absent. Found in grasslands along the coast and deserts near sea level to alpine dwarf-shrub habitat above treeline. Builds grass-lined nests in depressions on the ground in the open.	**Moderate Potential.** The grassland areas on the site provide suitable nesting habitat; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Loggerhead shrike (nesting) *Lanius ludovicianus*	BCC, CSC	This species is a year-round resident of lowlands and foothills with open habitat including scattered shrubs, trees, fence posts, or other perches.	**Moderate Potential.** The project site provides suitable nesting habitat; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence
Black-crowned night heron (rookery) *Nycticorax nycticorax*	—	Colonial nester, usually in trees, occasionally in tule patches. Rookery sites located adjacent to foraging areas: lake margins, mud-bordered bays, marshy spots.	**Moderate Potential.** Potential roosting and foraging habitat is available in the trees and ponds on site. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report. However, this species is no longer listed as a BLM Sensitive species.
California thrasher *Toxostoma redivivum*	—	Moderate to dense chaparral habitats and, less commonly, extensive thickets in young or open valley foothill riparian habitat up to1500 to 2000 m (5000 to 6600 ft). Avoids dense tree canopy. Seldom forages more than a few ft from shrub cover.	**Moderate Potential.** The project site provides suitable nesting and foraging habitat; not observed during surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report. However, this species is no longer listed as sensitive by state or federal agencies.
Osprey (nesting) *Pandion haliaetus*	CDF	Ocean shore, bays, freshwater lakes, and larger streams. Large nests built in treetops within 15 miles of a good fish-producing body of water.	**Moderate Potential.** Elizabeth Lake, Lake Hughes, Pyramid Lake, and Quail Lake are within 15 miles of the site, and osprey may nest in trees on site. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report. This species is no longer listed as a CDFG CSC species, but is on the CDFG Watch List.

Species	Status	Habitat	Discussion of Potential Occurrence
Purple martin (nesting) *Progne subis*	CSC	Woodlands and low-elevation forest, often of Douglas-fir, ponderosa pine, Monterey pine, and oak. Nests primarily in old woodpecker cavities. Will also nest in manmade structures. Nests are often located in tall, isolated trees or snags.	**Moderate Potential.** The project site provides suitable nesting habitat; not observed during site surveys. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Bald eagle *Haliaetus leucocephalus*	FD, CE, CFP, CDF	This species is primarily a fish-eating bird most commonly observed foraging and nesting along rivers and lakes in California.	**Low Potential.** The project site lacks suitable nesting and foraging habitat. . A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
California spotted owl *Strix occidentalis occidentalis*	BCC, CSC, FSS, BLM, USBC, AWL, ABC	Inhabits mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods, and a canopy closure of >40%. Also known to occupy riparian corridors. Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	**High Potential.** This species has been documented nesting within 1 mile of the project site and the site could be within the home range of a nesting pair. The project site provides suitable nesting and foraging habitat. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.
Least Bell's vireo *Vireo bellii pusillus*	FE, CE, USBC, AWL, BCC, ABC	Inhabits low riparian areas in the vicinity of water or in dry river bottoms. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, baccharis, and mesquite.	**High Potential.** The willow and willow-oak woodlands provide suitable nesting habitat for this species. Not observed on the site during USFWS protocol-level surveys (Impact Sciences 2004). Suitable nesting habitat is present. A reassessment of the project site conducted in 2011 found that habitat conditions have not significantly changed. The current potential for this species to occur on the project site is consistent with the assessment made in the 2007 Biota Report.

Species	Status	Habitat	Discussion of Potential Occurrence

KEY:

Federal
FE: Federally Endangered
FD: Federally delisted
FT: Federally Threatened
BCC: Bird of Conservation Concern
BLM: BLM Sensitive:
FSS: Forest Service Sensitive

State
CE: California Endangered
CFP: California Fully Protected
CDF: California Department of Forestry Sensitive
CSC: California Special Concern species

Other
ABC: American Bird Conservancy Green List
AWL: Audubon Watch List
R: Considered rare by professional entomologists
USBC: United States Bird Conservation Watch List
WBWG: Western Bat Working Group

Issue No 1b (2008.02.04):
"Recognize that Goldfinchs visit in migration."

Response:
American goldfinch and lesser goldfinch can be present during migration periods, whereas Lawerence's goldfinch is a nonmigratory species. The ADEIR will reflect that American and lesser goldfinches could be present during migration periods.

Issue No 13c (2005.03.07):
"Re-assess all CNDDB sensitive species in paragraphs."

Response:
Special-status species with potential to occur on the project site were reevaluated and the findings are presented in Tables 1 and 2 (See Response for Issue No 1 (2005.03.07); Issue No 1a and 22 (2008.02.04)). Section 11.2.12 on page 54 of the 2007 Biota Report and the impact analysis section of the ADEIR - Impact 5.5-10: Loss of Special-Status Wildlife Species on page 5.5-31, re-assesses in paragraphs those species recorded to the CNDDB that have the potential to be present on the project site and evaluates potential impacts to these species that could result from construction or operation of the proposed project.

Issue No 14 (2005.03.07):
"Discuss ponds and wetlands as a constraint. How will the project protect water quality?"

Response:
The ponds and wetland areas are considered sensitive biological resources and therefore the proposed project has been designed to avoid any direct and indirect impacts to these resources. As indicated in other responses, the project includes fencing and signage to detour visitors from entering these sensitive habitat areas.

The proposed project will use permeable concrete surfaces to allow for percolation and to reduce the amount of runoff that would occur. For more on water quality, refer to the Hydrology and Groundwater Quality Report (Integrated Water Resources Inc., November 15, 2006).

Issue No 15 (2005.03.07):
"Habitat loss is a CEQA issue--must be addressed in ADEIR."

Response:
Section 5.5.7.4 – Direct Project Impacts and Mitigation Measures on page 5.5-27 of the ADEIR describes the amount of each plant community that would be removed or otherwise impacted by the proposed project. In

addition, Figure E, Vegetation and Tree Impact Map, was created to depict the location of each plant community. This map also includes a table that lists the total area of each plant community and the amount that would be removed for project implementation.

Issue No 16 (2005.03.07):
"A table of impacts is needed that includes impacts from 200 ft. of fuel modification from all structures."

Response:
Figure E, Vegetation and Tree Impact Map, includes a table that lists the total area of each plant community within the Fuel Modification Zone. This figure will be included in the ADEIR. In summary, the following areas are located within the Fuel Modification Zone:

- Developed-Disturbed – 6.45 ac
- Interior Live Oak Woodland – 0.59 ac.
- Mixed Chaparral – 0.05 ac.
- Mixed Grassland – 2.6 ac.
- Pine Oak Woodland – 5.05 ac.
- Rush Sedge Mixed Grassland – 0.2 ac.
- Scrub Oak Chaparral – 1.24 ac.
- Willow Oak Woodland - .95 ac.
- Willow Riparian Woodland – 0 ac.

Issue No 17 (2005.03.07); Issue No 26 (2008.02.04):
"Losses of oak woodlands needs to be addressed and mitigated according to oak woodlands law."

Response:
Loss to oak woodlands is analyzed on page Section 5.5.7.4 – Direct Project Impacts and Mitigation Measures on page 5.5-27 of the ADEIR. The loss of Los Angeles County protected oak trees and proposed mitigation is addressed under **Impact 5.5-9 Loss of Protected Oaks** on page 5.5-29 of the ADEIR. Oak tree protection under the County of Los Angeles Oak Tree Ordinance is described under Section 5.5.5.2 Oaks on page 5.5-11 of the ADEIR.

Issue No 18 (2005.03.07):
"Assess the native component of "mixed grassland." 10% or more relative cover of all herbaceous natives = "native grassland."

Response:
A total of .42 acre of this plant community would be disturbed. If necessary, the percent cover of native grass species within this community can be assessed during a plant inventory in the spring of 2012.

Issue No 19 (2005.03.07):
"Willow flycatcher migration may be impacted-see 3a."

Response:
As described in the 2007 Biota Report and the ADEIR, two individuals were observed on the site during USFWS protocol surveys (Impact Sciences 2004). No evidence of nesting was observed and the observed birds are believed to be late migrants. The observed willow flycatchers could not be positively identified as belonging to the southwestern form of willow flycatcher.

No direct impact is proposed within, or immediately adjacent, to potentially suitable habitat for nesting or migrating willow flycatcher, which includes woodland areas with willow trees. Mitigation Measure Bio-12b

described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, Section 5.5 Biological Resources includes measures for avoiding breeding birds and bird nests during construction related activities. Moreover, the area where two migrating willow flycatchers were observed in 2004 would be fenced to inhibit access into this area by users during operation of the retreat center.

Issue No 20a (2005.03.07):
"Indirect impacts must include: water overdraft."

Response:
Conclusions in the Hydrology Study indicate the no increase in storm flows. The graded channel will be lined with a permeable turf reinforcement mat allowing for re-vegetation of all disturbed areas. Plants and seed mixtures will be under the direction of the project biologist.

See attached Domestic Water System Report dated July 15, 2008 by WREA and Hydrogeology and Groundwater Quality report dated November 15, 2006 by Integrated Water Resources, Inc.

Issue No 20b (2005.03.07):
"sewerage Wastewater Collection and disposal system report should be made available to SEATAC."

Response:
See attached Wastewater Collection and Disposal System Report by WREA and Letter summarizing Percolation testing performed on November 19, 2008 through November 20, 2008 by Professional Geotechnical Consultants, Inc.

Issue No 20c (2005.03.07):
"invasive plant species."

Response:
There are no non-native and or potentially invasive plant species included in the Fuel Modification Plan/Landscaping Plan. No species identified under the County of Los Angeles Fuel Modification Guidelines (July, 2011), Appendix III Undesirable Plant List are included in the Plan. The Fuel Mod Plan has been submitted to the County of Los Angeles FD Fuel Modification Unit for review and approval. Any changes requested by the Fuel Modification Unit will be incorporated into the final Plan.

Issue No 20d (2005.03.07):
"Argentine ants (through fuel mod. and landscape)."

Response:
Native plant removal can displace native reptile species that would otherwise feed on this invasive pest. Fuel modification associated with the proposed project is not expected to result in a direct dramatic increase in Argentine ant infestation. The Landscape Plan only includes native species, which is expected to limit the Argentine ants population that could otherwise increase if non-native species were used.

Issue No 21 (2005.03.07):
"Lighting plan needed (53-175 watt metal halide lights)."

Response:
The lighting plan has been revised to include nighttime lighting for on-site safety only. The number of fixtures has been reduced from 53 to 38. The light source is now 74 watt LED and the fixture is shielded and pointed downward. The pole height has been reduced from 16 feet to 14 feet. The fixtures have an energy savings and

environmental impact lowering function of providing 50% light levels when appropriate and the entire system will be timer controlled. See the attached site lighting plan A-SL-1.

Issue No 22a (2005.03.07):
"Permeable pavement needs to be included in paving plan."

Response:
All new asphalt paving will be permeable paving. See REVISED Master Architectural site plan sheet A-1

Issue No 22b (2005.03.07):
"Runoff control needs to be included in paving plan possibly use cisterns to capture for irrigation and fire fighting; make hydrology study+plan available to SEATAC."

Response:
All new buildings will be fitted with rain gutters to control storm runoff. Rain barrels will collect and store the storm water for later use in irrigation during the re-vegetation establishment period. New paved areas will have permeable surfaces.

Issue No 23a (2005.03.07):
"Needs a list of mitigation measures."

Response:
A summary of impacts and applicable mitigation measures can be found in **Table 4** below. This table would be updated in the revised ADEIR to reflect recent changes in the project design and associated project related impacts.

Table 4: Project Impacts on Biological Resources and Recommended Mitigation Measures

Impact	Significance	Recommended Mitigation
Impact 5.5-9: Loss of Protected Oaks	As shown in Figure 5.5-4, Impacted Oak Trees within the Project Site, 18 of the 217 oaks on the site under the jurisdiction of CLATO are within the grading/disturbance boundary. One of these trees is a "Heritage" oak. Of these 18 trees, 8 (including the "Heritage" oak) are within the preliminary grading boundaries and 10 are within the expected fuel modification zone. The removal of these oak trees would "conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance." Therefore, this loss is considered a significant	**Mitigation Measure 5.5-9(a):** The applicant shall apply for an oak tree permit from the County pursuant to CLATO and comply with all conditions stipulated in the permit. Typically, the permit requires a survey of all oak trees within 200 feet of the grading boundaries, the preparation of an oak tree survey report, measures to minimize impacts to remaining oak trees, and the replacement of oak trees at a specified ratio. At a minimum, the oak trees to be removed shall be replaced at a 2:1 ratio.

	impact.	
Impact 5.5-7: Loss of Common Wildlife	Construction and grading activities associated with the proposed project would directly disturb common wildlife species on the project site. In particular, species of low mobility (particularly small mammals and reptiles) would be eliminated during site preparation and construction. During the construction period, some wildlife species may emigrate from the project site and become vulnerable to mortality by predation, auto collisions, and unsuccessful competition for food and territory. In addition, species of low mobility could be eliminated during site preparation and construction. Due to the disturbed condition of most of the proposed building sites, and the location of the proposed structures adjacent to or near existing buildings, overall wildlife species diversity is expected to be relatively low. Most species present are expected to be those that are tolerant of, and adapted to, disturbed conditions. Because of the common nature and relatively small number of individual animals that would be displaced or eliminated are expected be displaced or lost as a direct result of construction activities, it is not expected that construction-related activities would cause a regional population of any common animal species to drop below self-sustaining levels. Therefore, impacts to common wildlife species from construction-related activities would be less than significant. Trees occurring within and adjacent to the proposed building	**Mitigation Measure 5.5-10(a):** Prior to the commencement of construction activities, a survey of all areas proposed for grading/construction activities shall be conducted for silvery legless lizard, coast horned lizard, and San Bernardino ringneck snake. The survey shall be conducted by a qualified biologist in possession of a valid California Scientific Collecting Permit. The survey shall be appropriately timed to maximize capture of individual animals, and at a minimum, shall include a spring survey (following the conclusion of the rainy season, when capture of silvery legless lizard is most probable). Depending on the timing of the project, an additional preconstruction clearance survey shall be conducted such that no more than 14 days have elapsed between the conclusion of the survey and the commencement of construction activities. Survey methodologies shall include visual surveys, raking, and the use of shade boards. Any animals observed within the grading/construction zone shall be relocated by the biologist to a suitable area outside of the construction zone.

	sites, and the grasslands on the site, provide suitable nesting habitat for common bird species. The MBTA and the California Fish and Game Code protect active nests all native bird species. Therefore, any construction-related loss of active bird nests would conflict with these federal and state laws.	
Impact 5.5-10: Loss of Special-Status Wildlife Species	The only special-status wildlife species observed on the site was (southwestern) willow flycatcher. This species was not observed nesting on the site during protocol surveys and it is expected that the two individuals observed were late migrants. Although not observed on the site, based on the presence of suitable habitat, the following special-status species have some potential to occur on the site: bright blue copper, green blue, yellow-blotched salamander, western spadefoot, silvery legless lizard, coast horned lizard, San Bernardino ringneck snake, two-striped garter snake, Cooper's hawk, tricolored blackbird, long-eared owl, Lawrence's goldfinch, northern harrier, yellow warbler, white-tailed kite, California horned lark, loggerhead shrike, purple martin, California spotted owl, and least Bell's vireo.	**See Mitigation Measure 5.5-10(a)** **Mitigation Measure 5.5-10(b):** Within 30 days prior to ground disturbance activities associated with construction or grading that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region**,** or as determined by a qualified biologist), the applicant shall have weekly surveys conducted by a qualified biologist to determine if active nests of bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present in the construction zone or within 300 feet (500 feet for raptors) of the construction zone. The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to initiation of clearance/construction work. If ground disturbance activities are delayed, then additional pre-construction surveys will be conducted such that no more than 3 days will have elapsed between the last survey and the commencement of ground disturbance activities. If active nests are found, clearing and construction within 300 feet of the nest (500 feet for raptors) shall be postponed or halted until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barrier, and construction personnel shall be instructed

		on the sensitivity of nest areas. Should an active nest of a federally-listed species be identified on the site, the applicant shall immediately contact the USFWS and halt construction-related activities until guidance on how to proceed has been issued. The biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests will occur. The results of the survey, and any avoidance measures taken, shall be submitted to the County of Los Angeles within 30 days of completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.
Impact 5.5-15: Landscaping Irrigation, Stormwater Runoff	Over-irrigation of landscaped areas, especially when combined with the use of chemicals, could lead to runoff that contains pesticides, herbicides, nitrates and other contaminants. Any runoff that flows into the sag ponds that contains high levels of nutrients, particularly fertilizers and waste products such as nitrogen and phosphorous, could result in eutrophication (excessive nutrient buildup). This in turn could result in depletion of available oxygen due to increased biological oxygen demand (BOD) and reduce available dissolved oxygen for aquatic organisms. Other chemicals, pesticides, and herbicides could also adversely affect the ponds. Paved surfaces would also contribute runoff into the sag ponds during storm events. Depending on the magnitude and frequency of storm events and the overall level of the water quality, this runoff could also	**Mitigation Measure 5.5-15(a):** Prior to issuance of a grading permit, the applicant shall prepare and submit to the County a Storm Water Pollution Prevention Plan. The plan shall demonstrate that water quality in the sag ponds will be maintained at or above its current level and shall be subject to approval by the County.

	cause increased eutrophication, depleted oxygen levels, long-term build-up of toxic compounds and heavy metals, and other adverse effects to biological resources associated with the ponds. Of particular concern is the proposed paved parking area (located to the west of the sag ponds) as associated petroleum products could enter the ponds. Given the above, impacts related to stormwater and irrigation runoff could substantially diminish habitat for wildlife or plants associated with the sag ponds and substantially degrade the quality of the environment. Therefore, indirect impacts resulting from landscaping irrigation and stormwater runoff are significant.	
Impact 5.5-16: Increased Populations of Non-Native Plant Species	The proposed plant palette includes several invasive plant species such as Bermuda grass and goldenrain tree (*Koelreuteria paniculata*). Although the project site is partially developed and already contains a large number of non-native and/or invasive plant species, the proposed project could introduce additional invasive plants to the site. Invasive plants could disperse into the less disturbed plant communities on and adjacent to the site (e.g., willow riparian woodland, willow-oak woodland, rush-sedge wetland, scrub oak chaparral) and displace native plant species. Therefore, the impact on native biological resources as a result of increased non-native plant species is considered significant.	**Mitigation Measure 5.5-16(a):** Prior to the issuance of a grading permit, the applicant shall prepare a landscaping plan. This plan shall be subject to approval by the County and shall include a plant palette composed of native, non-invasive species that are adapted to the conditions found on the project site.
Impact 5.5-17: Increased Human and Domestic Animal	The proposed project would increase the number of visitors to	**Mitigation Measures 5.5-17(a):** A public awareness program shall be

Presence	the project site. Given the presence of a trail system that provides access from the project site into the Angeles National Forest, the proposed project would also be expected to increase use of the Angeles National Forest. The effect of this increase in human presence would be the potential for increased human disturbances to, and on-going degradation of, natural habitats within and adjacent to the project site. Specifically, increased use of the site could result in increased noise disturbances to wildlife (especially within the breeding season of birds) which can result in nest abandonment; result in the harassment and/or capture of slower moving species, such as some reptiles and amphibians; the displacement of other wildlife species; increased amount of refuse and pollutants in the area; compaction of soils; and trampling of ground-dwelling flora and fauna. Increased human presence could also result in the accumulation of trash that could attract non-native animals to the site. An increase in the number of visitors to the project site could also result in a corresponding increase in use of the project site and adjacent areas by dogs and cats. Dogs and cats can disturb nesting or roosting sites and disrupt the normal foraging activities of wildlife. These disturbances may have a long-term effect on the behavior of both common and special-status animals and can result in their extirpation from the area. Given the above, impacts caused by increased human and domestic animal presence are considered to be significant.	developed that is intended to educate visitors to the retreat center of the importance of not disturbing the remaining woodland and chaparral habitats on and adjacent to the site, to staying on designated trails on the site and within the Angeles National Forest, to properly dispose of trash, and to not feed wildlife. This program shall include, among other things, posting an informational board in the proposed dormitory and cafeteria, and posting signs identifying ecologically sensitive areas. The program shall also include two site visits per year by a qualified biologist (subject to approval by the County) to determine if sensitive habitat areas are being degraded by human-related disturbance. As directed by the biologist, temporary fencing shall be installed around sensitive habitat areas that appear to be receiving a high level of disturbance. The applicant shall be responsible for the initial development and maintenance of the public awareness program, the installation of interpretive signs and fencing, and contracting with a qualified biologist to conduct the site visits. The measures to be included in the public awareness program shall be subject to approval by the County prior to the issuance of a grading permit. **Mitigation Measure 5.5-17(b):** While outdoors on the project site, all dogs shall be required to be leashed or to be within a fenced enclosure. Visitors shall not be allowed to bring cats to the Retreat Center. **Mitigation Measure 5.5-17(C):** Waste and recycling receptacles that discourage foraging by wildlife species adapted to urban environments shall be installed in common areas throughout the project site. **Mitigation Measure 5.5-17(d):** Split rail fencing shall be installed adjacent to the willow-oak woodlands in areas bordering access roads and trails.

Impact 5.5-19: Construction and Grading Activities	Construction and grading activities may result in deposition of fill as well as siltation and erosion into the sag ponds and wetlands, excessive dust accumulation on vegetation could result in the degradation or loss of some plant species, and soil compaction around remaining trees. These impacts, either permanent or temporary, are considered significant. Indirect impacts to oak trees bordering the proposed development areas would occur if machinery occurs within the dripline of these oaks during construction and grading activities. Given their location in relation to proposed development, numerous oak trees could be subject to indirect impacts from the project. These impacts are considered significant.	**Mitigation Measures 5.5-19(a):** Prior to the issuance of a grading permit, the applicant shall submit proposed Best Management Practices (BMPs) to the County for review. Measures shall be included to control siltation and erosion and excessive dust accumulation on vegetation. **Mitigation Measure 5.5-19(b):** All oaks with driplines within 50 feet of land clearing (including brush clearing) or areas to be graded shall be enclosed in a temporary fenced zone for the duration of the clearing or grading activities. Fencing shall extend to the resource protection zone (i.e., that area at least 15 feet from the trunk or half again as large as the distance from the trunk to the drip line, whichever is greater). No parking or storage of equipment, solvents, or chemicals that could adversely affect the trees shall be allowed within 25 feet of the trunk at any time. Removal of the fence shall occur only after a qualified biologist confirms the health of preserved trees.

Issue No 23b (2005.03.07):
"Needs Stormwater Pollution Prevention Plan (SWPPP); make hydrology study+plan available to SEATAC."

Response:
The Hydrology Study (Integrated Water Resources Inc., November 15, 2006) and the Preliminary Grading Plan (Hovell & Pilarski Engineering, January, 2012) are included in the SEATAC submittal package. SWPPP BMPs include permeable surfaces, rain barrel usage and natural re-vegetation of disturbed areas.

Issue No 23c (2005.03.07):
"Needs incorporation of Best Management Practices (BMP)"

Response:
- Soil stabilization will be accomplished thru re-vegetation of native materials on all new slopes (BMP).
- The rain barrels will be regularly maintained (BMP).
- The permeable parking and drive lanes provide for infiltration to reduce runoff (BMP).

Issue No 23d (2005.03.07):
"Needs management plan for septic system to save water quality of sag ponds and other wetlands."

Response:

A new advanced wastewater treatment unit will be constructed on-site to treat the proposed project's wastewater. The treated effluent will be disposed of in proposed seepage pits. See attached Wastewater Collection and Disposal System Report by WREA and Letter summarizing Percolation testing performed on November 19, 2008 through November 20, 2008 by Professional Geotechnical Consultants, Inc.

Issue No 24 (2005.03.07):
"Need landscape plant list. Must use only locally indigenous plants."

Response:
The Landscape Plan prepared by L. Newman Design Group (December, 2011) includes a list of plants that would be used for landscaping purposes. No non-native or invasive species are proposed and no species identified under the County of Los Angeles Fuel Modification Guidelines (July, 2011), Appendix III Undesirable Plant List are included in the Plan. The FMZ Plan has been submitted to the County of Los Angeles FD Fuel Modification Unit for review and approval. Any changes requested by the Fuel Modification Unit will be incorporated into the final Plan. Below is the plant palette that is provided in the Fuel Modification Plan (scientific names omitted from the list below, but are included on the FMP).

TREES:
California buckeye
Flowering ash
Toyon
California (western) sycamore
Coast live oak
Valley oak

SHRUBS/PERENNIALS:
Manzanita
Coyote buch
Wild lilac
Hollyleaf cherry
Bush poppy
California rose
Chia sage
Wooly blue curls
Fortnight lily
California brittlebush
Escallonia
Blue oat grass
Deergrass
Beard tongue
Flannel bush
Coffeeberry
Western redbud
Monkey flower
Matilija poppy

GROUNDCOVERS:
Dwarf coyote bush

GRASSES:
Buffalo grass

Onion grass

Issue No 25a (2005.03.07):
"Public awareness program must include a. no cats with visitors or residents."

Response:

Mitigation Measure 5.5-17(b) on page 5.5-41 of the ADEIR includes the following conditions:

"While outdoors on the project site, all dogs shall be required to be leashed or to be within a fenced enclosure. Visitors shall not be allowed to bring cats to the Retreat Center."

Issue No 25b (2005.03.07):
"Public awareness program must include a fence to protect all sensitive habitat areas."

Response:
Mitigation Measure 5.5-17(d) on page 5.5-41 of the ADEIR includes the following condition:

"Split rail fencing shall be installed adjacent to the willow-oak woodlands in areas bordering access roads and trails."

In addition, the REVISED Master Site Plan (Richard Brinser Architect Inc., January 2, 2012) includes a wood rail fence around the Willow Riparian Woodland and Rush Sedge Mixed Grassland that includes the sag pond area. This fence would be intended to prohibit visitors from entering this sensitive habitat area.

Issue No 25b (2005.03.07):
"Color photos of site needed."

Response:
Color photographs will be included in the ADEIR. Below is a series of 14 photographs that were taken at the project site during the site visit by Greg Ainsworth on December 29, 2011. Refer to the REVISED Master Site Plan (Richard Brinser Architect Inc., January 2, 2012) for locations of proposed project features and refer to Figure E, Vegetation and Tree Impact Map for the location of plant communities on the project site that are indicated in the photograph descriptions.

Photo 1. Facing east from existing road at view of disturbed area where the proposed Chapel Retreat Center would be located.

Photo 2. Facing west from existing road at view of disturbed area where the proposed Cafeteria and Pool would be located.

Photo 3. Facing east at view of disturbed area where the proposed Small Groups Meeting Room would be located.

Photo 4. Facing north at the National Forest Area Access Gate at southern boundary of project site. View of disturbed area (on right) where the proposed Small Groups Meeting Room would be located.

Photo 5. Facing south at the National Forest Area Access Gate. View of trail entrance to National Forest Area.

Photo 6. Facing north near the existing restroom facility at Willow Oak Woodland.

Photo 7. Facing northwest from existing road at view of disturbed area where the 24 Room Dormitory and Meeting Room is proposed.

Photo 8. Facing south from existing road at Caretaker Residence (on right) and Mixed Grassland (on left).

Photo 9. Facing north from existing road near Caretaker Residence at view of entrance to the project site from Pine Canyon Road and Mixed Grassland (on right).

Photo 10. Facing east from existing road near entrance of project site from Pine Canyon Road at view of Mixed Grassland and Rush Sedge Mixed Grassland. The Willow Riparian Woodland can be viewed on far left of this photograph.

Photo 11. Facing east from western edge of Willow Riparian Woodland. Further east is standing water that is not viewable in this photograph.

Photo 12. Facing west from western boundary of the Willow Riparian Woodland. View of Mixed Grassland and Rush Sedge Mixed Grassland. Pine Canyon Road is located on the far right of this photograph.

Photo 13. View of offsite land use consisting of graded land and equestrian facility located approximately 1 mile to the west of the project site along Pine Canyon Road.

Photo 14. View of land use consisting of graded land and equestrian facility located approximately 1 mile to the west of the project site along Pine Canyon Road.

Issue No 2a (2008.02.04):
"People must be prevented from sag pond access."

Response:
Mitigation Measure 5.5-17(d) on page 5.5-41 of the ADEIR includes the following condition:

"Split rail fencing shall be installed adjacent to the willow-oak woodlands in areas bordering access roads and trails."

In addition, the REVISED Master Site Plan (Richard Brinser Architect Inc., January 2, 2012) includes a wood rail fence around the Willow Riparian Woodland and Rush Sedge Mixed Grassland that includes the sag pond area. This fence would be intended to prohibit visitors from entering this sensitive habitat area.

Issue No 2b (2008.02.04):
"Structures must be located to lessen impacts."

Response:

The project site has been consolidated to lessen potential impacts. The open amphitheatre and pedestrian foot paths have been eliminated from the project design. As shown in the REVISED Master Site Plan, the parking and bus drop off area are now relocated to an area which is already disturbed. The new asphalt areas are created with permeable asphalt to lessen any impacts.

Issue No 3a (2008.02.04):
"Impacts are direct due to location in SEA and not "indirect."

Response:
Current indirect impacts such as nighttime lighting and noises on the SEA can be described as direct impact to the SEA in the revised ADEIR. However, it should be noted that the significance of the impact does not change whether it is described as direct or indirect. Please consider the following:

- The CEQA Guidelines define three types of effects (or impacts):

    1. Direct or primary effects that are caused by a project and occur at the same time and place.
    2. Indirect or secondary effects that are reasonably foreseeable and caused by a project, but occur at a different time or place.
    3. Cumulative effects, which refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- Indirect or secondary effects that are reasonably foreseeable and caused by a project, but occur at a different time or place. The CEQA Guidelines state the following:

    An indirect physical change in the environment is a physical change…which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect change in the environment (Section 15064 (d)(2)).

    …Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (Section 15358)(a)(2)).

- CEQA requires that significant impacts be specifically identified and disclosed. As stated in the Guidelines, "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects" (Guidelines Section 15126.2(a)).

Issue No 3b (2008.02.04):
"Impacts are more than they would be if retreat were sited in a developed area."

Response:
The project site has been consolidated to lessen potential impacts. The open amphitheatre and pedestrian foot paths have been eliminated from the project design. As shown in the REVISED Master Site Plan, the parking and bus drop off area are now relocated to an area which is already disturbed. The new asphalt areas are created with permeable asphalt to lessen any impacts.

As indicated on Figure E, Vegetation and Tree Impacts Map, the proposed project would result in development on 1.54 acres of previously disturbed areas. This equates to approximately 48 percent of the proposed occurring on

already disturbed areas. The remaining 52 percent of the proposed project would impact 0.12 acre of Interior Live Oak Woodland, 0.42 acre of Mixed Grassland, 0.77 acre of Pine Oak Woodland, 0.02 acre of Rush Sedge Mixed Grassland, and 0.34 acre of Scrub Oak Chaparral.

Issue No 4 (2008.02.04):
"Detail any structures to be removed or replaced (map)."

Response:
All structures to be removed have been identified with a note and shown dashed- see REVISED Master Site Plan.

Issue No 5a (2008.02.04):
"Reevaluate significance of impacts with respect to region in a quantitative and qualitative way."

Response:
Please provide clarity on reporting the significance of impacts with respect to the region can be evaluated quantitatively. As described in the ADEIR, impacts would be less than significant with mitigation. This is generally based on a qualitative and quantitative evaluation of each resource in the immediate vicinity of the project site, as well as a qualitative evaluation of the level of impact the project would have on each biological resource from a regional perspective.

Issue No 5b (2008.02.04):
"Map resources of the region with respect to site. Data from Forest Service should be used."

Response:
Figure A, CALVEG Map (2002-2003) and Figure B, CALVEG Map (1977-1979) were prepared to depict regional vegetation communities and contiguity with habitats onsite. These maps were prepared based on CALVEG GIS data provided by the USDA Forest Service.

Figure D, Bio Resource Map, includes the location of sensitive biological resources based on a recent query of the USDA Forest Service and CNDDB in December, 2011.

Figure C, Land Use Map has been prepared to depict land use of the region and surroundings, and shows preserved public land such as National Forest and designated Open Space.

Issue No 6 (2008.02.04):
"Loss of 81% of pine-oak woodland onsite must be evaluated with respect to region. Data from Forest Service should be used."

Response:
The proposed project has been designed to substantially reduce the amount of impacts to natural communities and to maximize project features to previously disturbed areas. As depicted and indicated on Figure E, Vegetation and Tree Impacts Map, a total of 7.29 acres of Pine Oak Woodland has been mapped on the project site. The proposed project would now impact 0.77 acre of this plant community, which is equal to10 percent of the Pine Oak Woodland located on the project site.

As described in the ADEIR, the trees to be removed within this plant community would primarily be from the outer margins of the woodland and the remaining on-site pine-oak woodland would remain intact. Given the relatively small amount of pine-oak woodland that would be removed, and that the functional value of this woodland would not substantially decrease, impacts would be less than significant. Moreover, the loss of individual oak trees would be subject to the County's Tree Ordinance. Mitigation Measure 5.5-9 of the ADEIR would require the project applicant to replace all protected oak trees at a ratio of 2:1, which is consistent with the County's current Oak Tree Ordinance.

Issue No 7 (2008.02.04):
"Runoff plan should be shown. Runoff into Creek should be shown to main water course. make hydrology study+plan available to SEATAC."

Response:
The Runoff Plan is the Drainage Concept Hydrology Map in the Drainage Study (a folded map in the back pocket.) The Preliminary Grading Plan implements the Drainage Concept. A defined creek is not shown to lie on the subject property. The site lies at the beginning of two drainage paths; one northerly and the other easterly. Most of the site runoff is directed northerly to the existing sag ponds, consistent with existing runoff characteristics of the site. Overflows, if occurring, flow to the existing road culvert.

Issue No 8a (2008.02.04):
"Mitigation should include measures to protect birds during construction."

Response:
Mitigation for protecting birds during construction is provided in **Mitigation Measure Bio-12b** of the 2007 Biota Report and 5.5-10(b) on page 5.5-35 of the ADEIR.

Issue No 8b (2008.02.04):
"Evidence for each measure's success should be cited for each sp. of bird."

Response:
Please provide clarity on this comment. Mitigation Measure 5.5-10(b) has been drafted to be consistent with the typical bird nest protection required in accordance with the Migratory Bird Treaty Act of 1918 and Fish and Game Code Section 3513 (migratory birds), Section 3503 (breeding birds), and Section 3503.5 (raptors).

Issue No 9 (2008.02.04):
"Will Forest Service permit fuel mod. on their property?"

Response:
No fuel modification is required or would occur on Forest Service land.

Issue No 10a (2008.02.04):
"Oak tree map should distinguish dead and live oaks clearly."

Response:
Figure E, Vegetation and Tree Impacts Map identifies oak trees that are dead and alive.

Issue No 10b (2008.02.04):
"Can grading be shifted to save oaks."

Response:
The project site has been consolidated to lessen impacts to biological resources, including oak trees. This has been achieved by removing the open amphitheater and pedestrian foot paths from the project design, which reduced the amount of grading outside of existing disturbed areas and thus reducing the number of oak trees that would be impacted.

The current design would impact 11 living oak trees, one oak tree that is almost dead, and one dead oak tree. Mitigation Measure 5.5-9 of the ADEIR would require the project applicant to replace all protected oak trees at a ratio of 2:1, which is consistent with the County's current Oak Tree Ordinance.

Issue No 11 (2008.02.04):
"Use a high resolution map in all cases. Need standardization of maps to high resolution."

Response:
All exhibits utilize high resolution.

Issue No 12 (2008.02.04):
"Resurvey for pond turtles."

Response:
As stated in Section 5.5.3.1.6 on page 5.5-3 of the ADEIR, Peter H. Bloom conducted surveys for California red-legged frog on the project site pursuant to accepted USFWS survey protocols for this species. Searches and/or habitat evaluations were also conducted for yellow-blotched salamander, Tehachapi slender salamander, western spadefoot toad, arroyo toad, foothill yellow-legged frog, mountain yellow-legged frog, southwestern pond turtle, coast horned lizard, silvery legless lizard, and San Bernardino ringneck snake. The surveys for all these species were conducted on July 26, 30, and 31, 2003. The species was not observed during focused searches conducted in 2003 (Bloom 2003).

Moreover, pond turtles typically occur in low-flowing streams or ponds with emergent vegetation and basking sites. The stagnant condition of the sag pond is not ideal for supporting pond turtles; therefore, the potential for pond turtle to occur is low.

Issue No 13 (2008.02.04):
"All potential impacts are not identified."

Response:
Please provide clarity on this comment. Potential impacts to sensitive biological resources are provided in Section 5.5-7 on page 5.5-25 of the ADEIR. Potential impacts and proposed mitigation measures are also summarized in Table 4 of this Response Letter (See response to No 23a (2005.03.07)).

Issue No 14a (2008.02.04):
"Foot traffic management needs to be shown on a map."

Response:
All visitors to the site will be confined to the developed areas. An informational kiosk will be construction on the site to educate visitors on the natural resources that exist in undeveloped areas and the reason it is important to stay out of these sensitive area. Information on the importance of staying on designated trails when using Forest Service designated trails will also be provided. The existing wildlife friendly fencing will be expanded to surround and protect the existing sensitive ecological areas. Additional signage will be added to the fences to explain and educate the visitors.

The information kiosk will be included in the project description that will be provided in the revised ADEIR.

Issue No 14b (2008.02.04):
"What are trail management procedures?"

Response:
No trails are proposed in the current project design. The existing access gate onto Forest Service land will be locked with access granted during daylight hours, with educational information requesting visitors to stay on the existing trails.

Issue No 14c (2008.02.04):
"Plan for signage of rules of the National Forest"

Response:
All visitors to the site will be confined to the developed areas. An informational kiosk will be construction on the site to educate visitors on the natural resources that exist in undeveloped areas and the reason it is important to stay out of these sensitive area. Information on the importance of staying on designated trails when using Forest Service designated trails will also be provided.

Issue No 14d (2008.02.04):
"Need a map for trails and split-rail fences (wildlife-friendly)"

Response:
The REVISED Master Site Plan includes a wood rail fence around the entire sag pond area/Willow Riparian Woodland that is intended to prohibit visitors from entering this sensitive habitat area. A wood rail fence would be installed to allow for wildlife to move freely though the site.

Issue No 14d (2008.02.04):
"Will there be "sacrifice" wetland areas, where persons may wade in water and mud?"

Response:
No.

Issue No 15 (2008.02.04):
"There needs to be clear, consistent estimate of numbers of persons using the site described w/ seasonality. Give totals staff + guests."

Response:
There will be maximum of 250 "retreatants" and 50 staff /chaperones allowed at any given time for a total of 300 persons max on site. The retreats are scheduled during summer months.

Issue No 16 (2008.02.04):
"Re-survey for Mariposa Lilies. These could occur in fairly dense chaparral."

Response:
There is no suitable chaparral habitat for mariposa lilies on the project site. The scrub oak chaparral is too dense and too tall, occurs in relatively flat areas, lack openings between plants, and lacks the proper (sun) aspect that is generally required to support mariposa lilies occur. Although plant surveys are outdated, no mariposa lilies were observed during appropriately timed surveys conducted in 2003 and 2005.

Issue No 17a (2008.02.04):
"Re-assess Golden eagles (*Aquila chrysaetos*)."

Response:
A golden eagle nest survey has not been conducted on the project site. Suitable nesting and foraging habitat is present on the project site. Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities. These measures would reduce potential impacts to nesting golden eagles (if present) to a level of less than significant.

Moreover, the lighting plan has been revised to show nighttime lighting for on-site safety only. Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would not be expected to interfere with the breeding or nesting cycle of the golden eagle (if present).

Issue No 17b (2008.02.04):
"Re-assess Swainson's hawk (*Buteo swainsoni*)"

Response:
Swainson's Hawks inhabit a wide variety of open habitats, ranging from prairie and shrubsteppe to desert and intensive agricultural systems. Nesting Swainson's Hawks occupy relatively level terrain to gently rolling hills, and typically avoid mountainous terrain or steep canyons (http://www.prbo.org/calpif/htmldocs/species/riparian/swainsons_hawk.htm).

Few historical records exist for bioregions dominated by mountainous, forested terrain (North Sierra Nevada-Cascade Range, North Coast-Klamath Mountains, and Southern Sierra Nevada-White Mountains) that would not typically be considered suitable habitat (Bloom 1980).

Swainson's Hawks are locally common to rare breeders in California, with the majority of known territories located in the Central Valley and Great Basin bioregions (Bloom 1980).

Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities. These measures would reduce potential impacts to nesting Swainson's hawk (if present) to a level of less than significant.

Issue No 17c (2008.02.04):
"Re-assess CA condor (*Gymnogyps californianus*)"

Response:
As indicated in the ADEIR in Table 5.5-2 on page 5.5-15, California condor requires vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. The project site lacks suitable nesting habitat; marginal foraging habitat present as the site lacks large expanses of open savannah, grasslands, and chaparral. The project site does not provide suitable nesting or foraging habitat (including a prey source) for the California condor.

Issue No 17d (2008.02.04):
"Re-assess Least bittern *(Ixobrychus exilis)*"

Response:
The least bittern is not a special-status species; however, it is protected under the Migratory Bird Treaty Act of 1918.

Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities. These measures would reduce potential impacts to nesting least bittern (if present) to a level of less than significant.

Issue No 18a and 18b (2008.02.04):
"Need trap-samples for small mammals and possible presence re-assessed."

Response:
Requesting reconsideration of this request based on scaled back project disturbance area and lack of suitable habitat for supporting special-status small mammal species. Precisely which small mammal species are of concern to the commenter? The ADEIR indicates that the project site does not provide suitable habitat for the Tehachapi pocket mouse. Mitigation Measure Bio-12a described on page 58 of the Biota Report and Mitigation Measure 5.5-10(a) on page 5.5-35 of the ADEIR, includes measures for reducing potential impacts to small mammal species, which includes capture and relocating animals to a suitable area located outside of the construction zone.

Issue No 19 (2008.02.04):
"All pavement should be permeable where possible. Show this on map of pavement."

Response:
All new asphalt paving will be permeable paving. See REVISED Master Architectural site plan sheet A-1

Issue No 21 (2008.02.04):
"Re-assess Long-eared owl (*Asio otus*)."

Response:
Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

The lighting plan has been revised to show nighttime lighting for on-site safety only. Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would not be expected to interfere with the breeding or nesting cycle of the Long-eared owl (if present).

Issue No 24b (2008.02.04):
"Reassess impacts on horned lark (*Eremophila alpestris*)."

Response:
The horned lark is no longer a special-status species (i.e., California Species of Special Concern) (California Department of Fish and Game (April 10, 2008), http://www.dfg.ca.gov/wildlife/nongame/ssc/docs/Table1_ FIN.pdf). However, horned lark is a protected species under Migratory Bird Treaty Act of 1918.

Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

Issue No 25 (2008.02.04):
"Distinguish CEQA impact and local policies impact."

Response:
Section 5.5-6 on page 5.5-21 of the ADEIR identifies policies and regulations that potentially apply to biological resources associated with, or potentially occurring on, the project site. Impacts discussed in the ADEIR identify policies that the project could be in conflict with, such as Impact 5.5-9 Protected Oak Trees discussed on page 5.5-31 of the ADEIR.

Issue No 26 (2008.02.04):

"County LA Oak Tree (Permit) ordinance (CLATO) needs to be addressed with mitigation plan."

Response:
See Section 5.5.5.2 Oaks on page 5.5-11 of the ADEIR for a discussion of the Los Angeles County Oak Tree Ordinance (CLATO) and Impact 5.5-9 Protected Oak Trees discussed on page 5.5-31 of the ADEIR for a discussion of potential impacts on oak trees that could occur including proposed mitigation measures.

Issue No 27 (2008.02.04):
"Re-assess impacts to Greata's aster (*Symphyotrichum defoliatum*)."

Response:
Greata's aster was detected and occurs in the willow/oak community in the northern portion of the project site. Three small groupings of this plant were discovered associated with willow/oak woodland in the northeast portion of the property. This population is outside of any anticipated impact areas; however, it is possible that undiscovered individuals of this species may be affected by fuel modification implementation within 200 feet of structures.

The Biota Report includes a mitigation measure for reducing impacts to Greata's aster (Mitigation Measure Bio-12); however, the ADEIR does not include this mitigation measure. The revised ADEIR will include a mitigation measure for preserving known occurrences of Greata's aster on the project site. The mitigation measures will require that prior to the issuance of a grading permit, the site shall be surveyed and all occurrences of Greata's aster shall be recorded with a GPS. This information will be depicted on the grading plan. Prior to grading, occurrences of Greata's aster shall be protected with construction fencing to ensure that equipment and workers do not enter or disturb occupied areas. The areas where Greata's aster occur will be avoided and preserved in perpetuity and no fuel modification practices will occur where Greata's aster has been recorded.

Issue No 28 (2008.02.04):
"Fencing should be closer to resource."

Response:
The REVISED Master Site Plan includes a wood rail fence around the Willow Riparian Woodland and Rush Sedge Mixed Grassland. Signage will be posted along the fence at various locations to inform visitors on the sensitivity of the habitat located within the fenced area.

Issue No 29 (2008.02.04):
"Appendix table of species needs to differentiate between native and non-native species."

Response:
Non-native plant species occurring on the project site are identified within the list of plants observed during the botanical survey. This list represents plant species detected by Impact Sciences on April 17 and May 22, 2003, and by Bruyea Biological Consulting on July 13, 2003. Plant taxonomy and nomenclature generally follow Hickman, as amended on the Jepson Herbarium Interchange website, located at http://ucjeps.berkeley.edu/interchange.html. The species identified on the project site during the two focused surveys are listed below. All species with an asterisk indicates non-native species.

GYMNOSPERMS
Pinaceae – pine family
Pinus sabiniana gray pine (common)

ANGIOSPERMS
Dicots

Amaranthaceae – pigweed family
**Amaranthus albus* tumble pigweed (uncommon)

Anacardiaceae – sumac family
Rhus trilobata skunkbrush (uncommon)
Toxicodendron diversilobum poison oak (common)

Apocynaceae – dogbane family
Asclepias californica California milkweed (occasional)
Asclepias fascicularis narrow-leaved milkweed (scarce)

Asteraceae – sunflower family
Ambrosia acanthicarpa annual bur-sage (occasional)
Ambrosia psilostachya western ragweed (common)
Artemisia tridentata ssp. *tridentata* Great Basin sage (common)
Artemisia douglasiana mugwort (scarce)
Artemisia dracunculus tarragon (occasional)
**Chamomilla suaveolens* pineapple weed
**Cichorium intybus* cichory
**Cirsium vulgare* bull thistle (common)
**Conyza bonariensis* flax-leaved fleabane (occasional)
Conyza canadensis horseweed (occasional)
Corethrogyne filaginifolia chaparral aster (common)
Erigeron foliosus fleabane aster (occasional)
Eriophyllum confertiflorum var. *confertiflorum* golden yarrow
Euthamia occidentalis western goldenrod
Gnaphalium palustre everlasting (scarce)
Gutierrezia sp. matchweed (occasional)
Helianthus annuus annual sunflower (occasional)
Helianthus gracilentus slender sunflower
**Lactuca serriola* prickly-lettuce (uncommon)
Lessingia lemmonii Lemmon's lessingia
Senecio flaccidus sand washed butterweed (scarce)
**Sonchus oleraceus* common sow thistle (uncommon)
Stephanomeria sp. wreath plant (occasional)
Symphyotrichum greatae Greata's aster (scarce)
Xanthium strumarium cocklebur (scarce)

Betulaceae – birch family
Alnus rhombifolia white alder

Boraginaceae – borage family
Heliotropium curassavicum wild heliotrope (common)

Brassicaceae –mustard family
**Brassica nigra* black mustard (common)
**Camelina microcarpa* false flax
Caulanthus amplexicaulis var.
amplexicaulis
clasping-leaved caulanthus

**Hirschfeldia incana* short-pod mustard (abundant)

Caprifoliaceae – honeysuckle family
Sambucus mexicana blue elderberry (common)

Chenopodiaceae – goosefoot family
**Chenopodium album* lamb's quarters (uncommon)

Cucurbitaceae – cucumber family
Marah macrocarpa wild cucumber (occasional)

Cuscutaceae – dodder family
Cuscuta sp. dodder (occasional)

Euphorbiaceae – spurge family
Croton setigerus doveweed (common)

Fabaceae – pea family
Lotus purshianus var. *purshianus* spanish clover (uncommon)
Lupinus bicolor lupine (common)
**Melilotus alba* white sweetclover (uncommon)
Trifolium obtusiflorum creek clover

Fagaceae – oak family
Quercus berberidifolia scrub oak (common)
Quercus chrysolepsis canyon live oak (common)
Quercus douglasii blue oak (occasional)
Quercus kelloggii black oak (uncommon)
Quercus lobata valley oak (common)
Quercus wislizenii interior live oak (common)
Quercus sp. unidentified oak (hybrid) (scarce)

Grossulariaceae – currant family
Ribes sp. currant (scarce)

Hamamelidaceae – witchhazel family
**Liquidamber styraciflua* liquidamber (ornamental) (scarce)

Hippocastanaceae – horse-chestnut family
Aesculus californica buckeye

Hydrophyllaceae – waterleaf family
Phacelia sp. phacelia (occasional)

Lamiaceae –mint family
**Marrubium vulgare* horehound (occasional)
**Mentha sp.* mint
Salvia columbariae chia
Stachys albens hedge nettle (scarce)

Malvaceae – mallow family

Malva neglecta dwarf mallow

Oleaceae – olive family
Fraxinus dipetala California ash

Onagraceae – primrose family
Camissonia contorta contorted sun-cup
Oenothera elata ssp. *hookeri* evening primrose (occasional)

Papaveraceae – poppy family
Argemone munita prickly poppy

Plantaginaceae – plantain family
**Plantago major* common plantain (common)

Polygonaceae – buckwheat family
Eriogonum fasciculatum var. *polifolium* California buckwheat (occasional)
Eriogonum sp. buckwheat (yellow flower) (common)
Eriogonum sp. buckwheat (pink flower) (uncommon)
**Polygonum aviculare* knotweed (uncommon)
**Rumex crispus* curly dock (uncommon)

Rhamnaceae – buckthorn family
Rhamnus californica California coffeeberry (occasional)

Rosaceae – rose family
Adenostoma fasciculatum chamise (occasional)
**Pyrus communis* pear tree (occasional)

Rubiaceae – madder family
Galium aparine bedstraw (common)

Salicaceae –willow family
Populus tremuloides quaking aspen (uncommon)
Salix laevigata red willow (occasional)
Salix lasiolepsis arroyo willow (occasional)

Scrophulariaceae – snapdragon family
Keckiella cordifolia heart leaved penstemon (uncommon)
Mimulus guttatus yellow monkeyflower
Mimulus pilosus false monkeyflower
Penstemon centranthifolius scarlet bugler (scarce)
Penstemon heterophyllus var. *australis* southern foothill penstemon

Solanaceae – nightshade family
Datura wrightii Jimson weed (uncommon)
Nicotiana quadrivalvis Indian tobacco (occasional)

Ulmaceae – elm family
**Ulmus pumila* Siberian elm

Urticaceae – family
**Urtica dioica* stinging nettle (occasional)

Verbenaceae – verbena family
Verbena lasiostachys var. *scabrida* western vervain (common)

Viscaceae –mistletoe family
Phoradendron villosum mistletoe (occasional)

Monocots
Cyperaceae – sedge family
Carex praegracilis sedge (common)
Schoenoplectus acutus hard-stem bulrush (common)

Juncaceae – rush family
Juncus balticus baltic rush (common)
Juncus effusus soft rush (occasional)
Juncus patens rush (occasional)
Juncus xiphoides iris-leafed rush (occasional)

Liliaceae – lily family
Bloomeria crocea common goldstar
Yucca whipplei Whipple's yucca

Poaceae – grass family
**Avena barbata* slender wild oats (abundant)
**Bromus catharticus* rescue grass
**Bromus diandrus* ripgut (abundant)
**Bromus hordeaceus* soft brome
**Bromus madritensis* ssp. *rubens* red brome (abundant)
**Bromus tectorum* cheatgrass
**Hordeum murinum* barley
Leymus condensatus giant rye grass (occasional)
**Schismus barbatus* Mediterranean grass (occasional)
**Poa bulbosa* bulbous blue grass (occasional)
Poa secunda one-sided blue grass (occasional)
**Polypogon monspeliensis* rabbit's foot
Vulpia microsyachys fescue (common)

Issue No 30 (2008.02.04):
"Redo the ornithological surveys. Relative abundance evaluations seem off-the-mark w/ respect to region."

Response:
The proposed project site is not a significant migration site or breeding site for a particular avian species; however, many common birds are expected to migrate, forage and breed and nest on the project site. A bird use count study that would provide information on relative abundance should not be necessary for a project of this type, which is expected to have minimal impacts on bird use and nesting, especially compared to a project such as a wind farm where relative abundance data is crucial to determine the level of impact from operational activities that could occur.

Mitigation Measure Bio-12b described on page 59 of the Biota Report and Mitigation Measure 5.5-10(b) on page 5.5-35 of the ADEIR, includes measures for avoiding breeding birds and bird nests during construction related activities.

Issue No 31 (2008.02.04):
"Complete the botanical survey data."

Response:
Please provide clarity on the comment. It is unclear what the commenter is requesting.

Issue No 33 (2008.02.04):
"Maintenance on busses should be prohibited."

Response:
No maintenance on busses would occur on the project site. This will be specified in the ADEIR.

Issue No 34 (2008.02.04):
"Minimize runoff from parking areas and roadways to ponds."

Response:
The parking area would not occur at the northwest corner of the project site as previously proposed. The proposed project will use permeable concrete surfaces to allow for percolation and to reduce the amount of runoff that would occur. For more on water quality, refer to the Hydrology and Groundwater Quality Report (Integrated Water Resources Inc., November 15, 2006).

The Runoff Plan is the Drainage Concept Hydrology Map in the Drainage Study (a folded map in the back pocket.) The Preliminary Grading Plan implements the Drainage Concept. The site lies at the beginning of two drainage paths; one northerly and the other easterly. Most of the site runoff is directed northerly to the existing sag ponds, consistent with existing runoff characteristics of the site. Overflows, if occurring, flow to the existing road culvert.

Issue No 1 (2010.05.03):
"Maps were illegible."

Response:
All exhibits utilize high resolution. Please specify which maps are no legible.

Issue No 2 (2010.05.03):
"Pages were missing."

Response:
All pages of the ADEIR are present. It is assumed the prior submittals did not include all pages of the ADEIR.

Issue No 5 (2010.05.03):
"Photocopies of color pages are illegible."

Response:
All current and future submittals will be legible.

Issue No 6 (2010.05.03):
"Surveys should be no more than 1 year old."

Response:
Please reconsider this request. The proposed project has been scaled back to reduce the amount of impacts to natural plant communities and protected oak trees. Approximately 48 percent of the proposed project would be constructed on previously disturbed areas. Mitigation measures and project design features have been incorporated that would further avoid impacts to sensitive biological resources and the SEA.

Public Comment (2007.11.10):
"Noise pollution must be addressed."

Response:
All outdoor activities will be focused near the new developed building area, which is located as far as feasible from sensitive biological resources (i.e., sag pond). Children playing will be the primary noise generated from the project site during the operation phase.

Public Comment (2007.11.10):
"Road widening for Bus turning lanes will require removal of habitat. Address this impact."

Response:
Bus turning lanes are not proposed. Road widening impacts required for emergency response vehicles are included in the impact calculations provided in Figure E, Vegetation and Tree Impacts Map.

Public Comment (2007.11.10):
"Water draw-down effects on wildlife and neighboring properties should be addressed Hydrology and Sewer reports should be available to SEATAC."

Response:
Los Angeles County Land Development has approved the Hydrology Study. Conclusions in the Hydrology Study indicate the no increase in storm flows. The graded channel will be lined with a permeable turf reinforcement mat allowing for re-vegetation of all disturbed areas. Plants and seed mixtures will be under the direction of the project biologist. See Hydrology and Groundwater Quality Report (Integrated Water Resources Inc., November 15, 2006)

5.5-7 (2011.09.13):
"I was impressed by the natural vegetational diversity of the site, including rare wetlands, grassland, woodlands, and impressed by the contiguous National Forest lands. From this I would predict high diversity, and I suspect that a retreat with about 300 persons in 30 acres with vehicle pollution and water issues will really change this. Neighbors report this area as one of high diversity, with wildlife ranging from black bear to small mammals, high trophic diversity."

Response:
It is true that the surrounding lands to the west, south and east are diverse and undisturbed. The woodland areas on the project site are also relatively undisturbed and intact, often forming a continuous canopy with woodlands that continue off-site. However, the proposed land use and development would not change substantially from that which currently exists. The scaled back project design ultimately reduces the amount of impacts to biological resources by maximizing project development to previously disturbed areas, as well as proposed mitigation measures that include wildlife-friendly fencing, planting oak trees in accordance with the County's replacement ratio, and information signage and a kiosk. These measures along with several others not mentioned here would minimize the effects that this project would have on the natural environment and biota that currently exists on and adjacent to the project site.

5.5-11 (2011.09.13):
"Other sensitive habitats (CDFG) include oak woodland; Rush-sedge wetland (Young Nak lawn); possible native grassland. These should all be listed and addressed with mitigations offered. Conflict is rush-sedge on p. 5.5-29 should reference M5.5-12."

Response:
Oak Woodland - CDFG does not consider oak woodland a sensitive habitat or special community. However, the loss of oak trees would be mitigated through compliance with the requirements of the Los Angeles County Oak Tree Ordinance, which requires planting of oak trees at a ratio of 2:1 and 10:1 for the removal of a Heritage tree (Mitigation Measure 5.5-9(a) on page 5.5-31 of the ADEIR). Trees must also be maintained and monitored until they are determined to be established and no longer reliant on supplemental irrigation or regular maintenance.

Rush-sedge wetland - The revised ADEIR will include the following additional mitigation measures to address impacts to jurisdictional resources, which includes the rush-sedge wetland area. These new mitigation measures are provided below:

- **New Mitigation Measure A:** Where jurisdictional wetlands and other waters cannot be avoided, a restoration plan shall be prepared that provides for replanting and monitoring for a minimum three-year period following construction to ensure riparian habitat is re-established.

- **New Mitigation Measure B:** The project applicant shall obtain wetland determination from ACOE, CDFG and/or RWQCB prior to project implementation for project features that may impact waters of the U.S and waters of the State.

Possible native grassland - The Mixed Grassland (lawn) appeared to have a high non-native species composition based on a reconnaissance-level assessment conducted by the ESA biologist on December 29, 2011. If necessary, the percent cover of native grass species within this community can be assessed during a plant inventory in the spring of 2012. If it is determined that the Mixed Grassland area contains few native species, this community may offer a decent mitigation area for replacing the 0.02 acre of rush-sedge wetland that would be disturbed.

5.5-13 (2011.09.13):
"The project does seem to recommend wood rail fences, which are wildlife-friendly (allow movement). Noise, lighting, potential for water pollution, hydrocarbons from vehicle pollution, removal of habitat vegetation of various kinds--all influence the wildlife movement. The SAF is one of the principle areas of wildlife movement in Los Angeles Co. and Southern California. Discussion must be more extensive--what you have is not sufficient, and suggests whoever wrote this knows little about the subject. Produce plans for water use, runoff control, sewage control, lighting, fencing, habitat impact and protection, and show how these relate to mitigating what is surely an impact."

Response:
As stated in the ADEIR, Section 5.5.5.6 Wildlife Movement Corridors "Value of the project site as a wildlife movement pathway is limited. The site is partially developed and is actively used as a retreat center. However, the project site does provide wildlife movement value. Specifically, given the project site's location adjacent to the Angeles National Forest, wildlife could move across the site and into the Forest. Furthermore, less disturbed habitats on the site, including willow riparian woodland along the northern project boundary, willow-oak woodland along the eastern project boundary, and pine-oak woodland along the western project boundary, provide potential movement pathways for locally occurring wildlife. Riparian habitat along the northern project boundary is considered of particular importance as it is within the San Andreas rift zone, which is considered to be a major habitat connection by the Los Angeles County Significant Ecological Area Technical Advisory Committee. Although vegetative cover within the rift zone has been fragment by past development, it serves an

important function as a wildlife movement corridor." "The project site is surrounded by undeveloped land with vegetative cover conducive to wildlife movement. "

In addition, the revised fencing plan as shown in the REVISED Master Site Plan will consist of open rail fencing that will allow wildlife to move through the site while creating a barrier intended to discourage users of the retreat from accessing the sag pond area.

The lighting plan has been revised to include nighttime lighting for on-site safety only. The number of fixtures has been reduced from 53 to 38. The light source is now 74 watt LED and the fixture is shielded and pointed downward. The pole height has been reduced from 16 feet to 14 feet. The fixtures have an energy savings and environmental impact lowering function of providing 50% light levels when appropriate and the entire system will be timer controlled. See the attached site lighting plan A-SL-1.

Based on the recent revisions to the Lighting Plan, the proposed project would not generate an excessive amount of nighttime lighting beyond what is currently present, and therefore, nighttime lighting associated the proposed project would not be expected to interfere with the movement of wildlife through the SAF located at the northern boundary of the site.

5.5.7.5 (2011.09.13):
"These impacts should be considered "direct" where they are on natural habitat of the SEA."

Response:
Current indirect impacts such as nighttime lighting and noises on the SEA can be described as direct impact to the SEA in the revised ADEIR. However, it should be noted that the significance of the impact does not change whether it is described as direct or indirect. Please consider the following:

- The CEQA Guidelines define three types of effects (or impacts):

    4. Direct or primary effects that are caused by a project and occur at the same time and place.
    5. Indirect or secondary effects that are reasonably foreseeable and caused by a project, but occur at a different time or place.
    6. Cumulative effects, which refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- Indirect or secondary effects that are reasonably foreseeable and caused by a project, but occur at a different time or place. The CEQA Guidelines state the following:

    An indirect physical change in the environment is a physical change…which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect change in the environment (Section 15064 (d)(2)).

    …Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (Section 15358)(a)(2)).

- CEQA requires that significant impacts be specifically identified and disclosed. As stated in the Guidelines, "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects" (Guidelines Section 15126.2(a)).

5.5-15(a) (2011.09.13):
"Storm water prevention plan should be part of EIR in view of the great reservations many members had about water usage, containment, and wastewater. Will these water-use plans be surfficient to maintain SEA waters, or will the project remain an impact?"

Response:
Best Management Practices (BMPs) include permeable surfaces, rain barrel usage and natural re-vegetation of disturbed areas. The Hydrology Study indicated that the project will not cause an increase to runoff in the watershed. Barney should be able to address the water usage and wastewater portion of this concern.

See attached Wastewater Collection and Disposal System Report by WREA and Letter summarizing Percolation testing performed on November 19, 2008 through November 20, 2008 by Professional Geotechnical Consultants, Inc.

See attached Domestic Water System Report dated July 15, 2008 by WREA and Hydrogeology and Groundwater Quality report dated November 15, 2006 by Integrated Water Resources, Inc.

5.5-17(e) (2011.09.13):
"landscape program needs invasive plant measures, including wheel-wash system for construction vehicles"

Response:
Please reconsider this comment. A wheel-wash system for construction vehicles is an excessive requirement.

5.5-17(d) (2011.09.13):
"fencing plan is needed to protect nearby Forest lands, any natural habitat remaining; wetlands"

Response:
The REVISED Master Site Plan includes a wood rail fence around the Willow Riparian Woodland and Rush Sedge Mixed Grassland that includes the sag pond area. This fence would be intended to prohibit visitors from entering this sensitive habitat area.

The existing access gate to the Forest Service land to the south will be locked with access granted during daylight hours, with educational information requesting visitors to stay on the existing trails. An informational kiosk will be construction on the site to educate visitors on the natural resources that exist in undeveloped areas and the reason it is important to stay out of these sensitive area. Information on the importance of staying on designated trails when using Forest Service designated trails will also be provided.

5.5-18 (2011.09.13):
"The watewater system will be percolating nearly the entire pumped amount w/ addition of salts.
This is potentially a big change. There was no calculation of this feature of water use, just volume.
It is important to hypothesize about quality also."

Response:
The proposed advanced wastewater treatment unit is capable of processing domestic strength wastewater to "better than secondary standards". As stated, water quality objectives will be defined by the WDR permit issued by the Los Angeles Regional Water Quality Control Board.

See attached Wastewater Collection and Disposal System Report by WREA and Letter summarizing Percolation testing performed on November 19, 2008 through November 20, 2008 by Professional Geotechnical Consultants, Inc.

Literature Cited

Bloom, P. H. 1980. The status of Swainson’s hawks in California.Cal. Dept. Fish and Game Fed. Aid in Wildlife Restoration Proj. W-54-R12.42pp.

England, A. S., M. C. Bechard, and C. S. Houston. 1997. Swainson's Hawk (*Buteo swainsoni*). *In* The Birds of North America, No. 265 (A. Poole and F. Gill, eds.). The Academy of Natural Sciences, Philadelphia, PA, and The American Ornithologists' Union, Washington, D.C.

Stephenson, J.R.; Calcarone, G.M. 1999. Southern California mountains and foothills assessment: Habitat and species conservation issues. General Technical Report GTR-PSW-175. Albany, CA: Pacific Southwest Research Station, Forest Service, U.S. Department of Agriculture.