



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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March 30, 2026

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**Subject: Secrets Unsealed Church Project (Project)
Notice of Preparation (NOP)
State Clearinghouse No.: 2026020673**

Dear Alyce Alvarez:

The California Department of Fish and Wildlife (CDFW) received an NOP from Fresno County, as Lead Agency, for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

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

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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

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

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

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

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Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened on any State or federal list pursuant to CESA and/or the federal Endangered Species Act (ESA) to be considered Endangered, Rare, or Threatened under CEQA. If a species can be shown to meet the criteria specified in the CEQA Guidelines (Cal. Code Regs., tit. 14, Chapter 3, § 15380), it should be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: Secrets Unsealed Ministry

Objective: This Project proposes to develop a church facility on a 47.8-acre portion of a 445.37-acre property in unincorporated Fresno County. The proposed Project would include the construction of four (4) church facility buildings, a caretaker residence, parking areas, landscaping, utilities, and related infrastructure. Supporting infrastructure would include an on-site well, a fire water storage tank, three septic systems with leach fields, and a private waste hauler for solid waste removal. Electrical power would be provided with on-site ground-mounted solar panels, and on-site gas or propane-powered generators would be used for backup power.

A new, approximately one-mile-long, 24-foot-wide paved private road extending east from Tollhouse Road would be constructed to provide site access and would terminate at a centrally located circular drop-off area near the campus buildings.

Location: The Project site is located southeast of the intersection of Tollhouse Road and Lodge Road, approximately 35 miles northeast of the City of Fresno and approximately 1 mile south of the unincorporated community of Tollhouse. The Project site is located on Assessor's Parcel Numbers (APNs) 138-140-12, 138-050-13, 140-031-02, and 140-320-21.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist Fresno County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the Draft Environmental Impact Report (DEIR) prepared for this Project.

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Special Status Species

Aerial imagery shows the majority of the Project site contains mixed oak woodlands with the northwest portion of the property containing several large open space areas comprised of annual grassland. Dry Creek and two intermittent streams are also noted within the Project site. The majority of the Project site is surrounded by undeveloped and undisturbed mixed oak woodland habitat with several rural residences located to the east and along a portion of the northern and southern boundary of the Project site. Lodge Road is adjacent to the western edge of the Project site.

Based on a review of the Project site's aerial imagery, the surrounding habitat, and California Natural Diversity Database (CNDDDB) records (CDFW 2026), the Project site is within the geographic range of several special status animal and plant species including, but are not limited to, the species identified in **Attachment 1** of this letter. These resources would need to be evaluated and addressed as part of the DEIR for this Project and prior to any approvals that would allow ground-disturbing activities. CDFW also recommends that the DEIR analyze potential impacts to these species and provide mitigation measures that would reduce impacts to less than significant levels as needed for implementation of the Project.

To adequately assess potential Project related impacts to biological resources in the DEIR, CDFW recommends that a qualified biologist perform relevant database reviews and other research of the Project site, then conduct focused habitat assessments and/or focused biological surveys during the appropriate survey period(s) in order to determine whether any special-status species may be present within the Project site. CDFW recommends this initial work be documented and used to inform further efforts that may be needed thereafter including the need for additional protocol surveys and/or the development of avoidance, minimization, and/or mitigation measures. This information and analysis may then be used to consider the development of modified or new Project alternatives to avoid and minimize potentially significant environmental impacts on the biological environment. This information is critical to make an informed decision during the CEQA process and to ensure Project compliance with CESA, Fish and Game code, and other applicable State and federal laws and regulations.

State Fully Protected Raptors

The Project site is within the known geographic range of bald eagle (*Haliaeetus leucocephalus*; BAEA) and golden eagle (*Aquila chrysaetos*; GOEA) and the species

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have been documented within the Project vicinity (CDFW 2026). BAEA has primarily been documented in the vicinity of the San Joaquin River and at Shaver Lake. GOEA has been documented in the neighboring Sierra National Forest. BAEA generally require large bodies of water with hunting perches of large limbed trees to pounce on fish or small mammals but have been known to utilize mixed conifer and woodland habitats without adjacent large bodies of water. GOEA are known to inhabit woodland areas with open areas for foraging and large trees for nesting and these habitat features are present within the Project site and vicinity. Both species have the potential to nest and forage within the Project site.

CDFW recommends that focused BAEA and GOEA surveys as part of the biological technical studies conducted in support of the DEIR. CDFW recommends that a qualified biologist conduct these surveys occur within the Project site and a ½-mile buffer of the Project site and that BAEA surveys follow the Protocol for Evaluating Bald Eagle Habitat and Populations in California (Jackman and Jenkins 2004) guidelines. CDFW recommends use of the Interim Golden Eagle Inventory and Monitoring Protocols and Other Recommendations guidelines (Pagel et al. 2010) for GOEA evaluations. If BAEA or GOEA is found to be breeding during these surveys, consultation with CDFW is recommended for guidance on the development of take avoidance measures.

Great Gray Owl and California Spotted Owl

The Project site is within close proximity of the known geographic range of great gray owl (*Strix nebulosa*; GGO) and is within the known geographic range of California spotted owl (*Strix occidentalis occidentalis*; CSO) (CDFW 2026). GGO are known to breed within the pine and fir forests of the Sierra Nevada Mountains and prefer to nest within habitats with dense coniferous forests and adjacent montane meadows and open areas. GGO are also known to move into oak woodland habitats in lower elevations to breed or winter (Wu et al., 2016). CSO are known to breed within mixed conifer forests in the Sierra Nevada Mountains but have been known to utilize mixed evergreen and mixed oak woodland forest types (Gutierrez et al., 2017). Based on a review of aerial imagery, the mixed woodland habitats within the Project site may provide suitable habitat for GGO and CSO nesting or wintering.

CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR, to determine if the Project site or vicinity contain suitable habitat for GGO and CSO nesting or wintering. If suitable habitat is present, CDFW recommends that the Project site be surveyed for

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GGO by a qualified biologist following the “Survey Protocol for the Great Gray Owl in the Sierra Nevada of California” (USFS 2000). If conducting a two-year GGO survey is infeasible, consultation with CDFW is warranted to determine if abbreviated surveys are appropriate for the Project. For CSO, CDFW recommends following the Protocol for Surveying Proposed Management Activities that may Impact Northern Spotted Owls survey protocol (USFWS 2011). In the event that GGO or CSO is detected during surveys, consultation with CDFW is recommended for guidance on the development of avoidance, minimization, and mitigation measures. For GGO, if take cannot be avoided, take authorization through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Foothill Yellow-legged Frog

The Project site is within the geographic range of foothill yellow-legged frog (*Rana boylei* pop. 5; FYLF) and historical and current occurrences are noted within ten (10) miles of the Project site (CDFW 2026). FYLF are primarily stream-dwelling and require shallow, flowing water in streams and rivers with at least some cobble-sized substrate (Thomson et al. 2016). FYLF move into neighboring upland areas to shelter when stream flow levels are high. Based on aerial imagery, the streams present within the Project site may contain suitable habitat for FYLF.

CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR, to determine if the Project site or vicinity contain suitable habitat for FYLF. If suitable habitat is determined to be present, CDFW recommends that a qualified biologist conduct focused surveys within suitable upland and breeding habitat. CDFW recommends the survey protocols be in accordance with the Considerations for Conserving the Foothill Yellow-Legged Frog (CDFW 2018a). In the event that FYLF is detected during surveys, consultation with CDFW is recommended for guidance on the development of avoidance, minimization, and mitigation measures. If take cannot be avoided, take authorization through the issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

California Tiger Salamander

The Project site is within close proximity of the known geographic range of California Tiger Salamander (*Ambystoma californiense* pop. 1; CTS) (CDFW 2026). CTS breed and develop in vernal and seasonal pools and stock ponds in grassland, woodland, and

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scrub habitat types. They require upland refugia (i.e., small mammal burrows) when not breeding. Based on aerial imagery, suitable upland refugia and breeding habitat may be present within the Project site.

CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR, to determine if the Project site or vicinity contain suitable habitat for CTS breeding or dispersal. If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for CTS following the USFWS's "Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander" (2003). In the event that CTS is detected during surveys, consultation with CDFW is recommended for guidance on the development of avoidance, minimization, and mitigation measures. If take cannot be avoided, take authorization through the issuance of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

Crotch's Bumble Bee

The Project site is within the known geographic range of Crotch's bumble bee (*Bombus crotchii*; CBB), and historical and recent occurrences have been documented within ten (10) miles of the Project site (CDFW 2026). CBB are known to inhabit areas of grasslands and scrub that contain requisite habitat elements for nesting, such as small mammal burrows and bunch/thatched grasses. Based on aerial imagery, the Project site and adjacent lands may contain suitable habitat for CBB nesting and foraging.

CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR, to determine if the Project site or vicinity contain suitable habitat for CBB. Potential nesting sites, which include all small mammal burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment. If suitable habitat is present, CDFW recommends that a qualified biologist conduct focused surveys for CBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023) as part of the biological technical studies conducted in support of the DEIR.

CDFW recommends the DEIR include the following:

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Recommended Mitigation Measure 1: CBB Surveys

If potentially suitable habitat is identified, CDFW recommends that a qualified biologist conduct focused surveys for CBB, and their requisite habitat features following the methodology outlined in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023) the blooming period immediately prior to Project implementation.

Recommended Mitigation Measure 2: CBB Avoidance

If CBB is detected, then CDFW recommends that all small mammal burrows and thatched/bunch grasses be avoided by a minimum of 50 feet to avoid take and potentially significant impacts. If ground-disturbing activities will occur during the overwintering period (October through February), consultation with CDFW is warranted to discuss how to implement Project activities and avoid take. Any detection of CBB prior to or during Project implementation warrants consultation with CDFW to discuss how to avoid take.

Recommended Mitigation Measure 3: CBB Take Authorization

If take cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.

State Special-status Species

The Project is within the geographic range of Townsend's big-eared bat (*Corynorhinus townsendii*), northwestern pond turtle (*Actinemys marmorata*), western spadefoot (*Spea hammondi*), and valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), and suitable habitat may be present within the Project site.

For Townsend's big-eared bat, northwestern pond turtle, and valley elderberry longhorn beetle, CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the DEIR, to determine if the Project site or the immediate vicinity contains potential habitat for the species mentioned above. If potential habitat is present, consultation with CDFW is recommended for guidance on focused survey methods and mitigation measures such avoidance, minimization, and mitigation.

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For western spadefoot (WESP), CDFW recommends that a qualified biologist conduct a habitat assessment for WESP as part of the biological technical studies conducted in support of the DEIR to determine where suitable breeding and refugia habitat is located within the Project site. WESP are known to occur within grassland, meadow, and vernal pool habitats. If suitable habitat is determined to be present, CDFW recommends that a qualified biologist conduct focused surveys for WESP, using appropriate survey methodologies, and during the appropriate time of year, within these areas of suitable habitat to inform the DEIR. If it is determined that WESP is present or has the potential to be present within the Project site, consultation with CDFW is recommended for guidance on mitigation measures such avoidance, minimization, and mitigation.

On September 24, 2025, the California Fish and Game Commission (Commission) received a petition to list the northern population of WESP as threatened species and the southern population of WESP as an endangered species under CESA. If the Commission takes action and WESP becomes listed as a Candidate for listing pursuant to CESA (possible in 2026), or ultimately becomes listed as threatened or endangered pursuant to CESA, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b), is necessary to comply with CESA if full avoidance of WESP could not be achieved.

Special Status Plants

Plants listed pursuant to the CESA and the Native Plant Protection Act (NPPA), as well as other special-status plants such as California Rare Plant Rank (CRPR) species, may occur within the Project site. Special-status plant species are threatened with habitat loss and habitat fragmentation resulting from development, vehicle traffic, urbanization, and introduction of non-native plant species (CNPS 2026). Therefore, Project activities may potentially have significant indirect, direct, and cumulative impacts to populations of the species mentioned above if present in and/or adjacent to the Project site.

CDFW recommends that the Project site be surveyed for special-status plants by a qualified botanist following the “Protocols for surveying and evaluating impacts to special-status native plant populations and sensitive natural communities” (CDFW 2018b) as part of the biological technical studies conducted in support of the DEIR. This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. If special-status plants are identified, consultation with CDFW is recommended for guidance on mitigation measures such avoidance,

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minimization, and mitigation. If State endangered, threatened, or rare plants are identified during special-status plant surveys, consultation with CDFW is recommended. If take cannot be avoided, then to ensure compliance with CESA and the NPPA, CDFW recommends consultation with CDFW for acquisition of an ITP, pursuant to Fish and Game Code section 2081, subdivision (b) and/or California Code of Regulations, Title 14, section 786.9, subdivision (b).

Editorial Comments and/or Suggestions

Lake and Streambed Alteration: Based on a review of aerial imagery, Dry Creek traverses the Project site from north to south and an intermittent stream crosses the Project site along the northern and eastern section. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's website <https://wildlife.ca.gov/Conservation/LSA> or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Oak Woodlands: CEQA was amended to include Public Resources Code section 21083.4, which states that a county shall determine whether a project within its jurisdiction may result in a conversion of oak woodlands that will have a significant effect on the environment. If a county determines that there may be a significant effect to oak woodlands, the county shall require appropriate oak woodlands mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands.

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CDFW recommends that impacts to oak woodland be assessed as part of the biological technical studies conducted in support of the DEIR. If it is determined that impacts to oak woodland habitat would occur, CDFW recommends the County require oak mitigation as required by CEQA section 21083.4. CDFW also recommends retaining large oak trees (greater than 12 inches in diameter as measured at breast height) on the Project site to the maximum extent possible. Large, acorn-bearing oak trees are a critical source of food for wintering deer and other wildlife, including migratory and resident birds. Locating access roads, utility connections, septic systems and building sites where they will require the minimum amount of disturbance to large oak trees is advised.

Artificial Lighting: Due to the Project's proximity to undisturbed habitat, installation of outdoor artificial night lighting would likely disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication, determining when to begin foraging, thermoregulation behavior, and migration (Longcore and Rich 2004, Miller 2006, Nightingale et al. 2006, Perry et al. 2008, Stone et al. 2009). Phototaxis, a phenomenon which results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore and Rich 2004). Project activities could result in disruption of wildlife behavior, inadvertent injury, or mortality.

CDFW recommends the Project include feasible mitigation measures to decrease the impacts of artificial outdoor lighting on wildlife species. Potentially feasible mitigation measures include motion sensitive lighting; mounting light fixtures as low as possible to minimize light trespass; use of light fittings that direct and confine the spread of light downward; and use of long-wavelength light sources. In addition, CDFW recommends that lighting not be installed in ecologically sensitive areas (e.g., streams, wetlands, and habitat used by special-status species, such as nesting/roosting sites and riparian corridors) and the use of the white/blue wavelengths of the light spectrum be avoided.

Cumulative Impacts: CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). CDFW recommends cumulative impacts be analyzed using an acceptable methodology to

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evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the project. An appropriate resource study area identified and utilized for this analysis is advised. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the Project's DEIR be used to develop and modify the Project's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, CDFW advises that remaining impacts to sensitive biological resources be mitigated to reduce impacts to a less than significant level, if feasible.

Nesting birds: CDFW encourages that ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

CDFW further recommends that a qualified biologist conduct a pre-construction survey for active nests no more than 10 days prior to the start of ground- or vegetation-disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project-specific activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the activities. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-

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listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when Project activities would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

CNDDDB: Please note that the CNDDDB is populated by records through voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB, but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record in the CNDDDB does not mean a species is not present. In order to adequately assess any potential Project related impacts to biological resources, surveys conducted by a qualified biologist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project site.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project-specific surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link:

<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to the CNDDDB at the following email address:

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

FILING FEES

The Project, as proposed, would have an impact on biological resources, and an assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project

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approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist Fresno County in identifying and mitigating Project impacts on biological resources. A Mitigation Monitoring and Reporting Program (Attachment 2) is included below to assist Fresno County with incorporating the recommended mitigation measures provided above.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). If you have any questions regarding this letter or further coordination, please contact Marile Colindres, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 974-3452, or by electronic mail at marile.colindres@wildlife.ca.gov.

Sincerely,

DocuSigned by:

FA83F09FE08945A...

Julie A. Vance
Regional Manager

ATTACHMENT 1: Special-Status Species Table

ATTACHMENT 2: Mitigation Monitoring and Reporting Program

ec: State Clearinghouse
Governor's Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

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ATTACHMENT 1

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
SPECIAL-STATUS SPECIES TABLE**

**PROJECT: SECRETS UNSEALED CHURCH PROJECT
(PROJECT)
NOTICE OF PREPARATION (NOP)
SCH NO.: 2026020673**

COMMON NAME	SCIENTIFIC NAME	STATUS	
		STATE	FEDERAL
BALD EAGLE	<i>HALIAEETUS LEUCOCEPHALUS</i>	E/FP	NONE
GREAT GRAY OWL	<i>STRIX NEBULOSA</i>	E	NONE
FOOTHILL YELLOW-LEGGED FROG – SOUTH SIERRA DISTINCT POPULATION SEGMENT	<i>RANA BOYLII POP. 5</i>	E	E
CALIFORNIA TIGER SALAMANDER – CENTRAL CALIFORNIA DISTINCT POPULATION SEGMENT	<i>AMBYSTOMA CALIFORNIENSE POP. 1</i>	T	T
CROTCH'S BUMBLE BEE	<i>BOMBUS CROTCHII</i>	C	NONE
GOLDEN EAGLE	<i>AQUILA CHRYSAETOS</i>	FP	NONE
TOWNSEND'S BIG-EARED BAT	<i>CORYNORHINUS TOWNSENDII</i>	SSC	NONE
CALIFORNIA SPOTTED OWL	<i>STRIX OCCIDENTALIS OCCIDENTALIS</i>	SSC	NONE
NORTHWESTERN POND TURTLE	<i>ACTINEMYS MARMORATA</i>	SSC	PT
WESTERN SPADEFOOT	<i>SPEA HAMMONDII</i>	SSC	PT
VALLEY ELDERBERRY LONGHORN BEETLE	<i>DESMOCERUS CALIFORNICUS DIMORPHUS</i>	SSA	NONE
SAN JOAQUIN VALLEY ORCUTT GRASS	<i>ORCUTTIA INAEQUALIS</i>	E	T
SUCCULENT OWL'S-CLOVER	<i>CASTILLEJA CAMPESTRIS VAR. SUCCULENTA</i>	E	T
TREE-ANEMONE	<i>CARPENTERIA CALIFORNICA</i>	T	NONE
MARIPOSA PUSSYPAWS	<i>CALYPTRIDIVM PULCHELLUM</i>	NONE	T
E= ENDANGERED, T=THREATENED, C= CANDIDATE FOR LISTING AS THREATENED AND/OR ENDANGERED, FP= FULLY PROTECTED, SSA= STATE SPECIAL ANIMAL, SSC= SPECIES OF SPECIAL CONCERN, PT=PROPOSED THREATENED			

Attachment 2

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

**PROJECT: Secrets Unsealed Church Project (Plan)
Notice of Preparation (NOP)
SCH No.: 2026020673**

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 1: CBB Surveys	
Recommended Mitigation Measure 2: CBB Take Authorization	
<i>During Construction</i>	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 3: CBB Avoidance	