



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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April 9, 2026

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**Subject: Groverland StorQuest Project (Project)
Draft Initial Study (IS) and Mitigated Negative Declaration (MND)
State Clearinghouse No.: 2026030505**

Dear Taryn Vanderpan:

The California Department of Fish and Wildlife (CDFW) received an IS and MND from Tuolumne County (County) for the above referenced Project pursuant 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. (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,

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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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 as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

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).

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

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PROJECT DESCRIPTION SUMMARY

Proponent: Sierra Nevada Engineering and Design

Objective: The Project proposes to construct a ministorage facility, a leasing office with an attached coffee shop and drive thru, a roof-mounted solar array, universal vehicle charging stations, associated parking, landscaping, fencing, and a stormwater retention pond.

Location: The Project site is located in the undeveloped portion of the community of Groveland, Tuolumne County, west of the intersection of State Highway 120 and Deer Flat Road. The Project site is located within Assessor's Parcel Numbers (APN) 066-070-014.

COMMENTS AND RECOMMENDATIONS

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

The MND notes the Project site is a relatively flat plot of forested land along State Highway 120 and elevations range from approximately 2,930 feet at the east end of the site at Deer Flat Road to approximately 3,030 feet at the northwest end of the site as the site slopes to the south toward an unnamed drainage.

The MND also notes the Project site is comprised of montane conifer-hardwood forest, which transitions into montane chaparral on the northern slopes of the site. An ephemeral stream comprised of montane riparian woodland and emergent wetland habitats is also present within the southern portion of the Project site and parallels State Highway 120. Surrounding land uses include vacant land to the west and north, vacant land and a single-family residence to the east, and Highway 120, a few residential homes, Southside Community Connections services, and a CALFIRE Groveland Station to the south.

The MND acknowledges that the Project site is within the geographic range of several special-status animal species and proposes specific mitigation measures to reduce impacts to less than significant. CDFW has concerns about the ability of some these measures to reduce impacts to less than significant and avoid unauthorized take for several special-status animal species, including but not limited to: the State endangered and fully protected bald eagle (*Haliaeetus leucocephalus*); the State endangered great gray owl (*Strix nebulosa*); the State candidate Crotch's bumble bee (*Bombus crotchii*); and the State species of special concern pallid bat (*Antrozous pallidus*), western mastiff

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bat (*Eumops perotis californicus*), western red bat (*Lasiurus frantzii*), and California spotted owl (*Strix occidentalis occidentalis*).

Bald Eagle

The MND states that bald eagle (BAEA) has no potential to occur within the Project site due to a lack of an adjacent large water body for foraging, and no mitigation measures are provided. The MND notes the closest water body is located in areas such as Pine Mountain Lake and Priest Reservoir, which are more than 2 miles from the Project site. CDFW doesn't concur that the Project site has no potential to support nesting and foraging BAEA. While BAEA are frequently documented nesting within close proximity of large water bodies and along coastlines, individuals have been documented nesting within the vicinity of smaller aquatic features and riverine features (CDFW 2026) and have been documented nesting as far away as approximately 3 miles from foraging habitat (Airola et al. 2025). As the Project site contains suitable mature nesting trees, and is centrally located within approximately 2 miles of several bodies of water that would be suitable for foraging, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 1: BAEA Focused Surveys

CDFW recommends that a qualified biologist conduct focused BAEA surveys following the Protocol for Evaluating Bald Eagle Habitat and Populations in California (Jackman and Jenkins 2004) prior to Project implementation.

Recommended Mitigation Measure 2: BAEA Avoidance Buffer

If a BAEA nest is found prior to, or during construction, CDFW recommends implementation of a minimum ½-mile no-disturbance buffer. CDFW advises that this buffer remain in place until the breeding season has ended or until a qualified biologist has determined that nesting has ceased, the birds have fledged, and are no longer reliant upon parental care for survival. In the event that a BAEA is detected during surveys, and a ½-mile no-disturbance buffer is not feasible, consultation with CDFW is recommended.

Great Gray Owl and California Spotted Owl

The MND states that great gray owl (GGO) has the potential to occur within the Project site and suitable foraging habitat is present. For California spotted owl (CSO), it does not appear that CSO was addressed within the MND and associated Biological Resource Assessment (BRA), even though there is suitable breeding and wintering habitat, and the Project is located within the species range. The MND includes Mitigation Measure (MM) BIO-2 to mitigate for potential significant impacts to nesting birds (which would include GGO and CSO), which requires that tree removal or pruning

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be conducted during the non-breeding season (September 1- January 31), or, if Project activities must occur during breeding season (February 1- August 31), a qualified biologist would conduct a preconstruction nesting bird survey no more than 2 weeks prior to Project-related disturbance activities. MM BIO-2 also requires a qualified biologist to establish a no-disturbance buffer around active nests and to monitor for signs of disturbance from Project activities. Finally, if it is determined that Project activities are disturbing the nest, Project activities would cease immediately and consultation with CDFW would occur for further guidance. CDFW does not concur that MM BIO-2 is sufficient to mitigate for potential significant impacts to GGO and CSO. In particular, CDFW is concerned that MM BIO-2's requirement for a single preconstruction survey and flexible language regarding the implementation of an appropriate no-disturbance buffer would not adequately mitigate for potential significant impacts to GGO and CSO and avoid unauthorized take of the species. Therefore, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 3: GGO and CSO Protocol Surveys

CDFW recommends that a qualified biologist conduct surveys following the methodology described in Survey Protocol for the Great Gray Owl in the Sierra Nevada of California (Beck and Winter 2000) prior to the start of Project-related activities. If conducting protocol-level GGO surveys is infeasible, consultation with CDFW is warranted to determine if abbreviated surveys are appropriate for the Project. For CSO, CDFW recommends a qualified biologist conduct surveys following the Protocol for Surveying Proposed Management Activities that may Impact Northern Spotted Owls survey protocol (USFWS 2011).

Recommended Mitigation Measure 4: GGO and CSO Avoidance Buffer

If an GGO active nest is found, CDFW recommends implementing a ½-mile no disturbance buffer for GGO nest, and that the no disturbance buffer be maintained until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If an active CSO nest is found, it is recommended that the Project proponent consult with CDFW to determine an appropriate no-disturbance buffer and implement appropriate avoidance and minimization measures.

Recommended Mitigation Measure 5: GGO Take Authorization

If nesting GGO are detected and the ½-mile no-disturbance buffer is infeasible, consultation with CDFW is recommended for further guidance to avoid take; or if avoidance is not feasible, to acquire an Incidental Take Permit (ITP) prior to Project activities, pursuant Fish and Game Code section 2081, subdivision (b).

Crotch's Bumble Bee

The MND states that Crotch's bumble bee (CBB) has the potential to occur within the Project site and suitable foraging and nesting habitat is present. The MND includes

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Mitigation Measures (MM) BIO-1 to mitigate for potential significant impacts to the species, which requires a preconstruction survey for CBB host plants, and flagging of host plants if identified. MM BIO-1 also states a plan would be developed and implemented to avoid, minimize, or compensate the loss of the species and their habitat in coordination with CDFW. CDFW does not concur that MM BIO-1 is sufficient to mitigate for potential significant impacts to CBB and CDFW is concerned that MM BIO-1's requirement for a single host-plant survey and preparation of a "plan" to avoid, minimize, and compensate for impacts to CBB would not adequately mitigate for potential significant impacts to the species and avoid unauthorized take. Additionally, implementation of minimization and compensation measures for CBB, absent a CESA ITP, would result in authorized take. Therefore, CDFW recommends the MND include the following measures:

Recommended Mitigation Measure 6: CBB Focused Surveys

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).

Recommended Mitigation Measure 7: CBB Avoidance Buffer

If CBB is detected, 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 CBB has been detected during appropriate surveys and ground-disturbing activities will occur, 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 8: CBB Take Authorization

If take cannot be avoided, CDFW recommends acquiring an ITP pursuant to Fish and Game Code Section 2081(b), prior to initiating ground-disturbing activities.

Special-status Bats

The MND states that special-status bats (SSB) have the potential to occur within the Project site and suitable roosting habitat is present. The MND includes MM BIO-3 to mitigate for potential significant impacts to the species, a preconstruction bat survey prior to tree removal or trimming, avoidance of known bat roosts to the maximum extent practicable, and monitoring of tree and limb removal by a qualified biologist to look for roosting bats. MM BIO-3 also states if special-status bats are detected roosting in the Project area, work shall cease and CDFW will be consulted on how to proceed, and a no-disturbance buffer of 50-feet will be implemented around roost sites until CDFW guidance is obtained. CDFW concurs with portions of MM BIO-3 but recommends the measures be modified to incorporate the following:

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Recommended Mitigation Measure 9: Special-Status Bat Focused Surveys

CDFW recommends the Project proponent conduct focused surveys to establish species usage and seasonal usage. Focused survey methodology is advised to include visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (guano), and use of ultrasonic detectors (Anabat, Sonobat, etc.) during all dusk emergence and pre-dawn re-entry. To maximize detectability, each survey needs to be conducted within one 24-hour period.

Recommended Mitigation Measure 10: Bat Roost Disturbance Avoidance and Minimization

If bats are present, CDFW recommends that a 100-foot no-disturbance buffer be placed around the roost and installing new roost sites to be in place prior to the initiation of Project related activities to allow enough time for bats to relocate. If a bat roost is identified and work is planned to occur during the breeding season, CDFW recommends that no disturbance to maternity roosts occur and that CDFW be consulted to determine measures to prevent breeding disruption or failure.

Editorial Comments and/or Suggestions

Nesting Birds: CDFW encourages that Project 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 1 through September 15), 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.

MM BIO-2 is provided to mitigate for potential Project-related impacts to nesting birds and states, "Tree removal, pruning, or grubbing activities should be conducted in the fall during the nonbreeding season (i.e., between September 1 and January 31), if possible, to avoid impacts to nesting birds." CDFW recommends modifying MM BIO-2 to note that the breeding season occurs from February 1 through September 15.

If the nesting season cannot be avoided, CDFW 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 activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes

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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-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 the Project site 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.

Artificial Lighting: Installation of outdoor artificial night lighting can 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 MND include 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.

Lake and Streambed Alteration: The MND states that prior to the issuance of a grading permit, the applicant shall demonstrate to the County that the Project has been designed to fully avoid disturbance of the riparian woodland, in-channel wetland, and associated sensitive habitat (i.e., streams). The MND further states that if the County determines that complete avoidance of streams cannot be achieved based on the final grading plans, the applicant shall coordinate with CDFW for features subject to Fish and Game Code section 1600 et seq. CDFW concurs with what is outlined in the MND and would like to note that 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

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(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 features such as riparian habitat that are associated with a stream.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement; 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 Lake or Streambed Alteration Agreement 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.

California Natural Diversity Database (CNDDDB) Positive Submission of Data:

Please note that the California Natural Diversity Database (CNDDDB) is populated by voluntary submission records 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 wildlife biologist/botanist 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 surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link:

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

<https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

FILING FEES

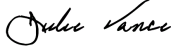
The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

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CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating Project impacts on biological resources. A Mitigation and Monitoring Program (MMRP) (Attachment 1) is included to assist the County with incorporating the recommended mitigation measures provided above. Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453 john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:

F A83F09FE08945A...
Julie A. Vance
Regional Manager

ATTACHMENT 1- MMRP Table

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Attachment 1

Attachment 1

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

PROJECT: Groverland StorQuest Project

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
<i>Before Disturbing Soil or Vegetation</i>	
Bald Eagle (BAEA)	
Recommended Mitigation Measure 1: BAEA focused surveys	
Great Gray Owl (GGO)	
Recommended Mitigation Measure 3: GGO protocol surveys	
Recommended Mitigation Measure 5: GGO take authorization	
Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 6: CBB focused surveys	
Recommended Mitigation Measure 8: CBB take authorization	
Special-status Bats (SSB)	
Recommended Mitigation Measure 9: SSB focused surveys	
<i>During Construction</i>	
Bald Eagle (BAEA)	
Recommended Mitigation Measure 2: BAEA avoidance buffer	
Great Gray Owl (GGO)	
Recommended Mitigation Measure 4: GGO avoidance buffer	

Crotch's Bumble Bee (CBB)	
Recommended Mitigation Measure 7: CBB avoidance buffer	
Special-status Bats (SSB)	
Recommended Mitigation Measure 10: SSB Avoidance and Minimization	

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