Letter from O-Ongo Inc. (Pali Mountain) Dated July 22, 2013

Attachment 2

July 22, 2013

Local Agency Formation Commission
215 north D Street, Suite 204
San Bernardino, CA 92415-0490

An Initial Study (IS), Notice of Determination (NOD) and fee receipt was prepared for APN 0328-042-02 Camp Pali (O-Ongo) CUP File Number 10604CU/M243-14/2004/CUP01 by Pat McGuckian of the San Bernardino County Land Use Services Department on November 16, 2004. The original 74-acre camp facility was created in 1939. The facility today has 44 buildings (581,182 square feet) and various recreational amenities such as an open air amphitheater go cart track, horse riding, soccer field and other facilities. The expansion includes the following components:

Construction and use of the 29,005 sq. ft. dining facility, 10 cabins each with a floor area of 1,872 sq. ft., a suspended slide at the existing Lake, a new 150,000 gallon water tank that will replace the existing 50,000 gallon tank, and a 1,118 sq. ft. office for an existing organizational camp and adult conference center for a maximum of 520 guests and 55 staff members on 73.2 acres. In support of the expansion, this project also includes installing water and sewer lines, with two lift stations, and natural gas lines to the new water tank and buildings. The development of this project has accounted for the Fire Marshall's requirement to increase the fire suppression capabilities on site by widening the existing roads to 26 feet wide and by increasing the water line and water storage capacities.

The location of the project is within known habitat for the state listed as threatened southern rubber boa (*Charina umbratica*). To address potential impacts to this species the project proponent corrdinated with the California Department of Fish and Wildlife (CDFW). Prior to the issuance of CDFW Operation of Law Letter for the Pali Mountain Upgrades Streambed Alteration Agreement 1600-2012-0041-R6, the permittee had already committed to several measures designed to avoid impacts to the SRB. The measures include:

1. A qualified biologist will conduct a survey on the project area prior to any ground disturbance (including installing exclusionary fencing).
2. The project will utilize standard silt fencing as a non-porous barrier that will enclose the work zones to exclude SRB from entering into the work area.
3. The silt fence will be buried at least six inches below the ground to prevent a snake intent on getting under the fence from doing so.
4. The integrity of the silt fence will be checked every morning and the fence will be repaired as needed.
5. Prior to construction, a biologist familiar with SRB will provide all construction personnel with an environmental awareness class that will outline the natural history of the SRB, the laws concerning this species, the biologists responsibilities and the contractors responsibilities as well as consequences of injuring or killing a SRB.
6. During the initial ground disturbance (brushing, grubbing and grading) a biologist will be on site to monitor.
7. The biologist will then inspect the site on a spot check basis for the remainder of the project. If, in the unlikely event, a SRB wanders into the work area, work will halt until a biologist holding a valid Scientific Collecting Permit to handle SRB can come to the site and move the snake out of harm's way.

In addition to the commitments outlined above the project proponent also commits to visually delineating the entire sewer line and waterline work zone between the new cabins and the water tank and sewer system above, at Knob Hill, so that the leaf litter can be hand raked (with the guidance of a qualified SRB biologist). The alignment will be cleared of leaf litter to bare ground before trenching so the biologist can monitor and ensure no SRB enter the work zone of the sewer alignment.

Sincerely,

Andrew Wexler
President/Owner

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