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June 27, 2005

John Hecht
West Coast Environmental & Engineering
1838 Eastman Avenue, Suite 200
Ventura, CA 93003

Dear Mr. Hecht:

The following letter report presents the results of a reconnaissance-level biological survey conducted on May 4, 2005 within the boundaries of the Ozena Valley Ranch mine lease area (Ventura County, California). The survey focused on the land located immediately north of the proposed new stock pond and adjacent to the permit boundaries of Conditional Use Permit (CUP) 5170-2 (Figure 1). This latter area supports annual grassland with a small inclusion of wet meadow (where water ponds and has no external drainage), while the site of the proposed new 15-acre stock pond has been used historically for active agricultural purposes. The survey was conducted for the purposes of evaluating whether (1) any significant or important biological resources are located within the site proposed for the new stock pond and (2) the area to the immediate north of the proposed stock pond site is appropriate as a mitigation site for biological impacts within this latter area.

The site of the proposed new 15-acre stock pond has been used for active agricultural operations (e.g., production of carrots or beans), but has been allowed to fallow for the last two years. Consequently, it has a cover of annual grasses and forbs that are either common to the region or that establish in recently disturbed areas. Four natural vegetation communities occur outside of this site, but on the borders of the CUP boundaries. These communities include Southern Cottonwood-Willow Riparian Forest, Southern Willow Scrub, Scalebroom Floodplain Scrub, and Alkali Meadow (Holland 1986). The descriptions of these communities are provided in the California Environmental Quality Act Environmental Checklist Form prepared by David Magney Environmental Consulting (DMEC 2004) and are hereby incorporated by reference. It should be noted that the site has limited biological value given its historical agricultural uses.

The area immediately north of the proposed stock pond site supports annual grassland. In addition, a portion of this area supports wet meadow. This latter area

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supports ponding or near surface soil saturation during at least the early portion of the growing season (and possibly later). It consists of a shallow basin with no external drainage and is likely supported by an impervious subsurface soil layer. The greater area has been characterized by DMEC as Alkali Meadow based on the associated plant species that have been documented at the site. The area shows evidence of cattle grazing (e.g., animal use trails and fecal material), but is not overgrazed as it supports a plant cover of approximately 90-100%.

It should be noted that the request to use the site characterized as Alkali Meadow as mitigation for impacts to biological resources at the site of the proposed new stock pond appears to be superfluous. The mitigation is at best out-of-kind since there is no Alkali Meadow within the area of impact. Furthermore, the loss of value associated with the area of impact is negligible given the type of biological resources that occur at the site (i.e., disturbed ruderal vegetation). Therefore, it appears that there is no clear nexus for requiring fencing or other constraints as mitigation within the Alkali Meadow.

Should you need additional information or clarification in regards to this letter report please do not hesitate to contact me (916-638-7368).

Sincerely,

Michael Bumgardner

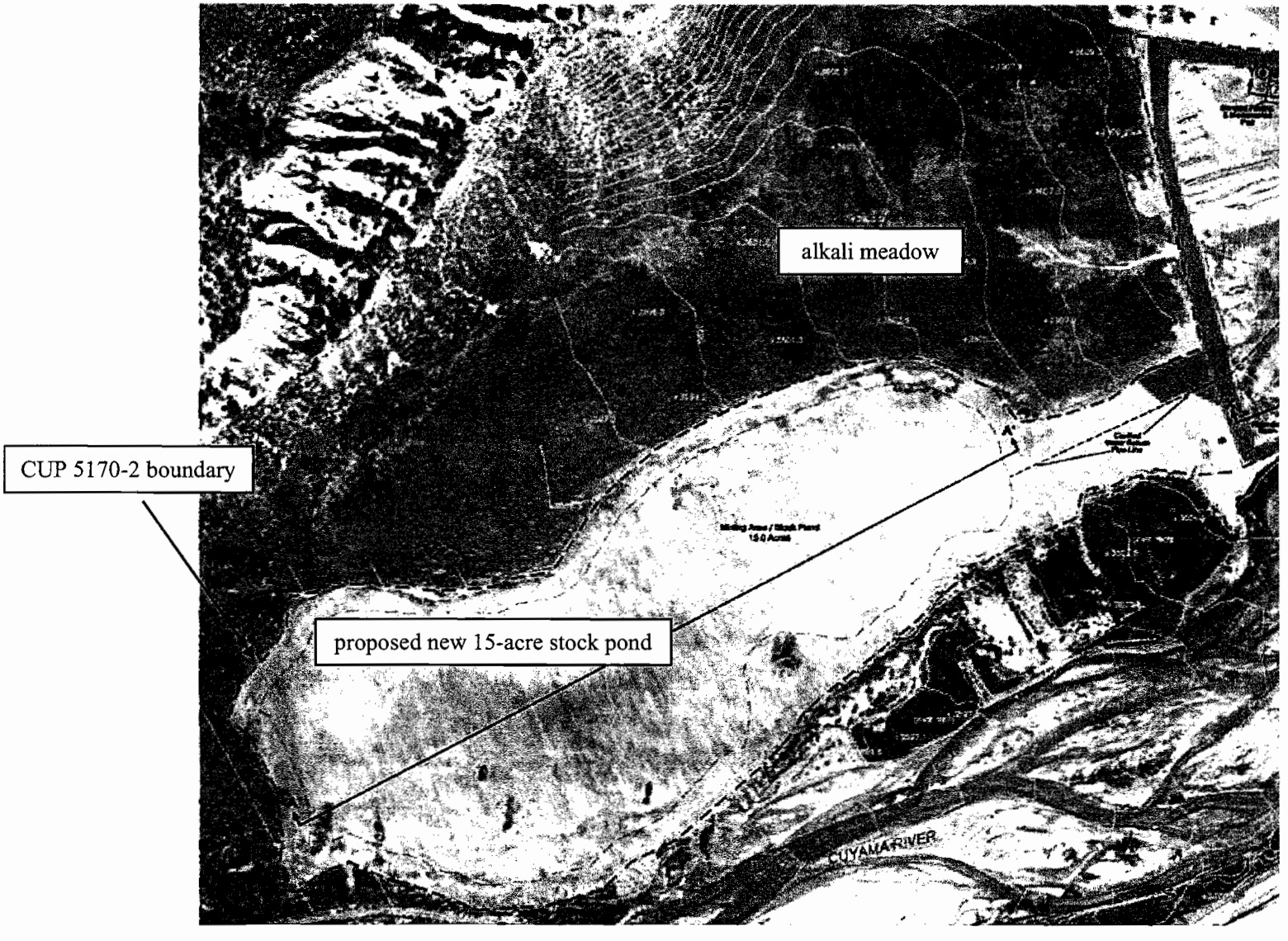

Figure 1
Ozena Valley Ranch Site Plan for New Proposed Mining Area/Stock Pond, Ventura County, California