

**Addendum  
to  
Biological Resource Assessment**

for

**Santa Rita Holdings, LLC  
Cannabis Cultivation Project (19CUP-00000-00018)**

5423 Santa Rita Road

APN (099-110-060)  
Santa Barbara County

Prepared for

**Santa Rita Holdings, LLC**  
c/o Jason Hillenbrand  
5423 Santa Rita Road  
Lompoc, CA 93463

by

**ALTHOUSE AND MEADE, INC.**  
**BIOLOGICAL AND ENVIRONMENTAL SERVICES**  
1602 Spring Street  
Paso Robles, CA 93446  
(805) 237-9626

**March 2021**  
**Revised September 2021**

## Table of Contents

1	INTRODUCTION .....	1
1.1	Purpose .....	1
1.2	Project Location.....	1
1.3	Project Description .....	1
2	METHODS .....	3
2.1	Surveys .....	4
3	RESULTS .....	5
3.1	Botanical Resources.....	5
3.1.1	Special Status Plant Species .....	5
3.2	Wildlife Resources.....	11
4	ENVIRONMENTAL IMPACT ANALYSIS .....	14
4.1	MM BIO-1a. Tree Protection Plan .....	15
4.1.1	Coast Live Oak Woodland and Individual Oak Trees.....	15
4.2	MM BIO-1b. Habitat Protection Plan.....	15
4.2.1	Habitats.....	15
4.2.2	Special Status Plants .....	16
4.2.3	Nesting Birds.....	16
4.2.4	California Tiger Salamander .....	17
4.3	MM BIO-3. Wildlife Movement Plan.....	21
4.3.1	Wildlife Movement.....	21
5	CONCLUSION .....	22
6	REFERENCES .....	23
7	APPENDICES.....	25

## List of Tables

TABLE 1. BIOLOGICAL SURVEYS CONDUCTED IN 2019 AND 2020.....	4
TABLE 2. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR.....	8
TABLE 3. SPECIAL STATUS ANIMALS WITH POTENTIAL TO OCCUR .....	12
TABLE 4. UPDATED WILDLIFE LIST (COUNTY COMMENT 5.1) .....	13
TABLE 5. IMPACTS AND MITIGATIONS SUMMARY .....	14
TABLE 6. POTENTIAL HABITAT IMPACTS .....	16

## Appendices

APPENDIX A. SITE PLAN FOR SANTA RITA PROJECT APN 099-110-060
APPENDIX B. FIGURES
APPENDIX C. SPECIAL STATUS PLANTS REPORTED FROM THE REGION
APPENDIX D. SPECIAL STATUS ANIMALS REPORTED FROM THE REGION
APPENDIX E. COUNTY COMMENTS AND ACTIONS ADDRESSED

## 1 INTRODUCTION

---

### 1.1 Purpose

This report serves as an addendum to the *Revised Biological Resources Assessment for Cannabis Cultivation Project (19CUP-00000-00019)* prepared by Storrer Environmental Services, LLC (Storrer 2020) and provides information requested by the County of Santa Barbara (County) in a peer-review memorandum received on October 23, 2020 (SB County 2020). The Storrer Biological Resources Assessment (BRA) will remain the primary environmental assessment document with the following additional information provided herein:

- Updated Project Description (Section 1.3) and Site Plan (Appendix A)
- Updated and Expanded Rare Species Research (Section 2)
- Updated Rare Species Assessment (Sections 3.1 and 3.2)
- Updated Impact Analysis (Section 4)

### 1.2 Project Location

The 120-acre parcel (Property) is located at 5423 Santa Rita Road (APN 099-110-060) in an unincorporated part of the County, approximately mid-distance between the Cities of Lompoc and Buellton. Approximate coordinates for the center of the parcel are 34.674478°N, 120.312899°W (WGS84) in the Los Alamos United States Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 1).

A total of 28.1 acres was surveyed (Survey Area) during the original assessment, to include approximately 27.6 acres of the property dedicated to cannabis cultivation (Project), and the known California tiger salamander (*Ambystoma californiense*) breeding pond (LOAL-40) of approximately 0.5 acre, located northeast of the parcel boundary (Figure 2).

### 1.3 Project Description

The cultivation operations will include outdoor cultivation, hoop house cultivation, and a nursery. There will be 1.88 acres in hoops, 0.55 acres in outdoor grow (no hoops), and 0.11 acres in nursery. Cultivation would take place in raised beds in the ground, and 3-gallon pots will be used in areas where raised beds are not practical. The immature grow area (nursery) will be cultivated in 4-inch or 1-gallon pots. No cultivation will occur within the 50-foot setback from top of bank of ephemeral drainage (a reduction from 100-foot required in a rural setting substantiated in the Biological Resource Assessment), hoop structures will adhere to the 100-foot setback and the cannabis activities in general will adhere to the 50-foot setback from the property lines. Hoop house coverings will be pulled back as needed during the winter months to avoid storm water channeling. Pulled back plastic coverings will remain on the metal frames. Fiber rolls are proposed to assist with capturing sediment and runoff from the site. There will be 2-3 harvests per year, taking place between 6 am and dusk. Plants will be chopped in the field, binned, and put into a refrigerated truck for transport to a processing facility. All drying and processing will be done off-site.

The hoops will be approximately 14 feet high by 24 feet wide with various lengths and will be seasonally covered with a plastic/poly. The metal structures will remain in place year-round with the plastic/poly removed as needed and during the raining season to allow for rainwater to percolate into the soil and prevent run-off.

Site improvements associated with the project for compliance with the Santa Barbara Zoning Ordinance, Santa Barbara County Program Environmental Impact Report (PEIR) for cannabis activities, the County Environmental Health & Safety Department, include 'dark sky' compliance exterior security lighting, security fencing and cameras, the installation of three 5000-gallon irrigation water storage tanks, and the installation of hoop houses. Water is provided by Vista Hills Mutual water company. Septic tanks are serviced by Lee and Neal Septic. Electricity for the home is provided through PG &E's solar program. PG &E will be providing electricity for security cameras and security lights where possible. A small submersible pump that requires electricity will be used to mix nutrients in the nutrient tank for the nursery. Gravity will be used to feed the rest of field crop. No electricity will be used inside hoop houses. There is no grading proposed for this project.

The onsite single-family dwelling will be utilized as a residence with the main permanent employees residing there. There are bathroom facilities inside the home that are on a septic tank and they will provide the facilities for the permanent employees. Temporary/seasonal employees will be provided chemical toilets.

The location of the subject site is at the end of a very long private road with a diminishing easement, and as such the project is not visible from a public view so no screening is proposed. Adjacent land use is cattle grazing.

The Existing security fencing is 8-foot deer fence securing the cultivation area. Security cameras are strategically placed at the entrance to the property and around the roads of the property. All exterior lighting will be dark sky compliant on motion sensors and will illuminate the entrance gate to the premises, and the driveway between the gate and the house. The cannabis operation will be served by Vista Hills Mutual Water Company and augmented by 6 water tanks. There is one bathroom in the house that will be used by the 3 full time employees and is shown on the floor plan of the residence. Part time employees will utilize portable restrooms on site as shown on the site plan.

There will be no noise generating equipment or environmental control systems used inside or outside the hoop houses.

The subject property would be accessed by way of Highway 246 to Santa Rita Road. Vehicle trips generated by incoming and outgoing delivery of supplies or product would average one to two trips per day. Providing an opportunity for the permanent employees to reside in the house will reduce daily trips. Temporary/seasonal employees will be utilized but these seasonal workers will carpool to the facility.

## 2 METHODS

---

Relevant literature and data were reviewed to determine what biological resources may occur in or near the Property. Information reviewed included species recovery plans, published research articles, species accounts, queries of special status species occurrence records, and relevant biological reports of the area (A&M 2020a; A&M 2020b). Research also included review of topographic maps and National Wetland Inventory (NWI) data (USFWS 2019).

The California Natural Diversity Database (CNDDDB; CDFW 2020a), California Native Plant Society (CNPS) On-line Inventory of Rare and Endangered Plants of California, and U.S. Fish and Wildlife Service (USFWS; Service) Critical Habitat data were reviewed in February 2021 for the nine USGS 7.5-minute quadrangles surrounding the Property: Sisquoc, Foxen Canyon, Zaca Lake, Los Alamos, Zaca Creek, Los Olivos, Santa Rosa Hills, Solvang, and Santa Ynez.

Additional special status species research consisted of searching online herbarium specimen records maintained by the Consortium of California Herbaria. Websites such as Californiaherps.com, iNaturalist.org, Santa Barbara Natural History Museum, and eBird.org were also reviewed as secondary sources of information on special-status species occurrence records. Special status species lists produced by database and literature searches (refer to Appendix C and Appendix D) were cross-referenced with the described habitat types on the Property to identify all potential special status species that could occur on or near the Property (County Comment 4.1).

After review of the literature and completion of field surveys, the following criteria were used to determine the potential for special status species to occur on the Property:

- **Present:** The species was observed on the Property during field surveys.
- **High Potential:** Highly suitable habitat and CNDDDB or CNPS occurrence records indicate the species is likely to occur in the Property or the immediate vicinity. Individuals may not have been observed during field surveys; however, the species likely occurs in or immediately adjacent to the Property and (for wildlife) could move into the Property in the future.
- **Moderate Potential:** Moderately suitable habitat is present on the Property and CNDDDB occurrences or surveys have recorded the species in the vicinity of the Property. Individuals were not observed during field surveys, but the species could be present, at least seasonally or as a transient.
- **Low Potential:** Marginally suitable habitat is present on the Property, and there are no occurrence records or other historical (i.e., 50 years or older) records in the vicinity of the Property. Individuals were not observed during surveys and are not expected to be present.
- **No Potential:** Suitable habitat for the species is not present on the Property, and/or the species is not known to occur in the region.

Additional information regarding each special status species that could occur in or near the Survey Area is individually discussed in Sections 3.1.1 and 3.2.

## 2.1 Surveys

Field investigations were not conducted in support of this Addendum. Prior field investigations by Storrer Environmental Services, LLC included mapping and documentation of primary vegetation types with survey details and methodologies provided for in the Revised BRA (Storrer 2020). An overview of surveys conducted in 2019 and 2020 is provided in Table 1 below. Botanical nomenclature used in this document follows the Jepson Flora Project (Jepson Flora Project (eds.) 2019).

Botanical surveys were conducted on April 9, 2019, February 5, 2020 and May 28, 2020 (Table 1). The May 2020 survey was conducted during the appropriate blooming period to detect and identify special-status plant species that have the potential to occur in the Survey Area (County Comment 4.2).

**TABLE 1. BIOLOGICAL SURVEYS CONDUCTED IN 2019 AND 2020**

Biological survey information conducted by Storrer Environmental Services, LLC (Storrer 2020) includes survey type, date, field personnel, and area surveyed.

Type of Survey	Date	Field Personnel	Area Surveyed
Botanical Survey Wildlife Survey ESH/Vegetation Mapping Aquatic Sampling of LOAL-40	April 9, 2019	John Storrer Justine Cooper	Survey Area and stock pond (LOAL-40) <sup>1</sup> (Approximately 28 acres)
Botanical Survey Wildlife Survey Fence Line Mapping	February 5, 2020	John Storrer Jessica Peak	Existing/Proposed Fenced Areas (Approximately 7 acres)
Spring Botanical Survey CNPS Vegetation Rapid Assessment Forms	May 28, 2020	Jessica Peak	Survey Area, excluding stock pond (LOAL-40) (Approximately 28 acres)

<sup>1</sup> See Figure 3 for extent of Survey Area and location of LOAL-40 relative to Project features.

## 3 RESULTS

---

### 3.1 Botanical Resources

Updated research on special status plant occurrences conducted within the designated search area (see Methods) determined 53 special status plant species are known to occur in the region (Appendix C). The following section includes special status plants with potential to occur on the Property and provides an updated evaluation for special status species based on recent CNDDDB and CNPS queries (CDFW 2021) that were not addressed in the original BRA.

#### 3.1.1 Special Status Plant Species

Based on an analysis of known ecological requirements for the special status plant species reported from the region (Appendix C), and the habitat conditions that were observed in the Survey Area, it was determined that 12 special status plant species have some potential to occur within the Survey Area. Table 2 lists the 12 special status plant species for which appropriate soil and habitat conditions exist, and therefore could potentially occur in the Survey Area. Federal and California State status, Global and State rank, CRPR, typical blooming periods, and habitat preference for each species are provided (CNPS 2021; CDFW 2021).

Six special status plant species listed in Table 2 were included in the revised BRA (Table 3, Section 5.2; Storrer 2020). An additional six species were determined to have some potential to occur in the Survey Area: seaside bird's-beak (*Cordylanthus rigidus* subsp. *littoralis*), paniculate tarplant (*Deinandra paniculata*), Saints' daisy (*Erigeron sanctarum*), southern curly-leaved monardella (*Monardella sinuata* subsp. *sinuata*), California spineflower (*Mucronea californica*), and sand almond (*Prunus fasciculata* var. *punctata*). Santa Ynez groundstar (*Ancistrocarphus keilii*) was discussed in the original BRA (Storrer 2019) but warrants further discussion regarding its bloom period and survey results.

These seven special status species are discussed below and include species habitat and range restrictions (from the CNDDDB and CNPS), known occurrences, and survey results from Storrer Environmental in 2019 and 2020. The proposed Project is composed almost entirely of disturbed habitats and special status plants are not expected to occur in the Project footprint.

- A. **Santa Ynez Groundstar** (*Ancistrocarphus keilii*) is a CRPR 1B.1 species endemic to Santa Barbara County. It is known to occur on sandy soils of cismontane woodland and chaparral habitats between 40- and 130-meters elevation. It is an annual herb that typically blooms between March and April. The closest known record is approximately 1.5 miles southwest of the Survey Area (CCH #63224), observed in sandy border of woodland habitat in 1929. Though suitable sandy soils are present on the site, the only known occurrence is historic and this species has low potential to occur. Santa Ynez groundstar was not detected during April 2019, February 2020, or May 2020 surveys by Storrer Environmental. It is very unlikely that Santa Ynez groundstar occurs in the Survey Area and no further surveys are recommended.
- B. **Seaside Bird's-Beak** (*Cordylanthus rigidus* subsp. *littoralis*) is listed as Endangered under the California Endangered Species Act (CESA) and is a CRPR 1B.1 subspecies endemic to Monterey and Santa Barbara Counties. It is known to occur on sandy soils and disturbed sites in closed-cone coniferous forest, maritime chaparral, coastal scrub, cismontane woodland,



and coastal dune habitats between 0- and 515-meters elevation. It is an annual hemi-parasitic herb that typically blooms between April and October. The closest known record is approximately 1.7 miles south of the Survey Area (CCH #UC1541118), reported in 1956. More recent records occur southwest (in 1973) and west (in 1982) of the Survey Area by approximately 5.2 and 5.9 miles, respectively (CCH #50882 and #JEPS83266). Sandy soils in the Survey Area are suitable to support seaside bird's-beak, but due to the lack of more recent occurrences and general disturbed quality of the site, this species has low potential to occur. Seaside bird's-beak was not detected in the Survey Area during the appropriately timed botanical survey conducted in May 2020. No further surveys are recommended for this species (County Comment 5.2).

- C. Paniculate Tarplant** (*Deinandra paniculata*) is a CRPR 4.2 species reported from the San Francisco Bay area south to northern Baja California. It is known to occur on sandy soils in grassland, coastal scrub, vernal pool and wetland habitats between 25- and 940-meters elevation. It is an annual herb that typically blooms between May and November. The closest known occurrence is approximately 1.6 miles southeast of the Survey Area, where paniculate tarplant was observed during biological surveys conducted near Drum Canyon Road in summer 2020 (A&M 2021 *in prep*). Paniculate tarplant is known to occur in large densities throughout the Los Alamos area and could occur on the project site. The coastal scrub and disturbed habitat with sandy soils on the Property is suitable for this species and paniculate tarplant has high potential to occur. Paniculate tarplant was not detected during the appropriately timed botanical survey conducted in May 2020. No further surveys are recommended for this species.
- D. Saints' Daisy** (*Erigeron sanctarum*) is a CRPR 4.2 species endemic to the central coast of California. It is known to occur in chaparral, coastal scrub, and openings in woodlands between 75- and 245-meters elevation. It is a rhizomatous perennial herb that typically blooms between March and July. The closest known record is approximately 6.6 miles west of the Survey Area (CCH #UCSB025409), in 1983. The woodland and scrub habitat with sandy soils in the Survey Area are suitable for this species, though known occurrences are relatively far from the project site. Saints' daisy has low potential to occur in the Survey Area. Saints' daisy was not detected during the appropriately timed botanical survey conducted in May 2020. No further surveys are recommended for this species.
- E. Southern Curly-leaved Monardella** (*Monardella sinuata* subsp. *sinuata*) is listed as a CRPR 1B.2 species, typically found in sandy soils of coastal strand and sagebrush scrub in lower elevations (less than 300 meters). The closest known occurrence is approximately 1.6 miles southeast of the Survey Area, where southern curly-leaved monardella was observed during biological surveys conducted near Drum Canyon Road in summer 2020 (A&M 2021 *in prep*). This species was observed growing around a cattle trough in sandy soil. Due to more recent occurrences in the vicinity and the presence of suitable sandy soils, southern curly-leaved monardella could be present, however the generally disturbed quality of the site reduces the potential for this species to occur. Southern curly-leaved monardella was not detected in the Survey Area during the appropriately timed botanical survey conducted in May 2020. No further surveys are recommended for this species (County Comment 5.2).
- F. California Spineflower** (*Mucronea californica*) is a CRPR 4.2 species endemic to Monterey to San Diego Counties. It is an annual herb that grows in sandy soils in grassland, coastal scrub, dune, woodland, and chaparral habitats between 0- and 1,400-meters elevation. It

typically blooms between March and July, occasionally to August. The closest known occurrence is approximately 1.6 miles southeast of the Survey Area, where California spineflower was observed during biological surveys conducted near Drum Canyon Road in summer 2020 (A&M 2021 *in prep*). This species was observed intermittently dispersed throughout agricultural habitat with sandy soils. Open areas within disturbed habitat containing sandy soils provide suitable habitat for this species and it was assessed to have moderate potential to occur. California spineflower was not detected in the Survey Area during the appropriately timed botanical survey conducted in May 2020. No further surveys are recommended for this species.

- G. Sand Almond** (*Prunus fasciculata* var. *punctata*) is a CRPR 4.3 variety endemic to San Luis Obispo and Santa Barbara Counties. It is known to occur in sandy habitats in maritime chaparral, coastal dune and scrub, and woodland habitats between 15- and 200-meters elevation. It is a deciduous shrub that typically blooms between March and April, though vegetative material can be detected and easily identifiable as early as fall. The closest known record is approximately 1.6 miles southeast of the Survey Area near Drum Canyon Road (A&M 2021 *in prep*). This species has been known to occur in disturbed and agricultural habitat that has been left fallow in the vicinity of scrub or chaparral. Sand almond has moderate potential to occur in the Study Area but is not expected to be present in the Project footprint due to routine disturbance from on-going agricultural activities. Due to the perennial shrub lifeform of this species, sand almond is detectable outside of its bloom period and was not detected in the Survey Area during the botanical survey conducted in May 2020. No further surveys are recommended for this species.

**TABLE 2. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR**

	Scientific Name	Common Name	Fed/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
1.	<i>Ancistrocarphus keilii</i>	Santa Ynez groundstar	-/ G1/S1 1B.1	Mar-Apr	Sandy soils in chaparral bordering oak woodland, under shrubs. Elevation range: 100 – 450 feet.	<b>Low.</b> Suitable sandy soils and woodland or shrub habitat is present. All occurrences are historic and presence is unlikely.
2.	<i>Arctostaphylos purissima</i>	La Purisima manzanita	-/ G2/S2 1B.1	Nov-May	Sandstone outcrops, sandy soils, and chaparral. Elevation range: 0 – 1,000 feet.	<b>Low.</b> Suitable sandy soils are present, though manzanita shrubs were not detected in the Survey Area.
3.	<i>Arctostaphylos rudis</i>	Sand mesa manzanita	-/ G2/S2 1B.2	Nov-Feb	Sandy soils and chaparral. Elevation range: 0 – 1,300 feet.	<b>Low.</b> Suitable sandy soils are present, though manzanita shrubs were not detected in the Survey Area.
4.	<i>Cordylanthus rigidus</i> subsp. <i>littoralis</i>	Seaside bird's-beak	-/CE G5T2/S2 1B.1	Apr-Oct	Sandy, often disturbed sites, usually within chaparral or coastal scrub. Elevation range: 98 – 1,700 feet. .	<b>Low.</b> Marginal habitat with sandy soils is present in the Survey Area, though most records are historic and/or over 5 miles from the Property (County Comment 5.2).
5.	<i>Deinandra paniculata</i>	Paniculate Tarplant	-/ G4/S4 4.2	Mar-Dec	Grassland, open chaparral and woodland, disturbed areas, often in sandy soils	<b>High.</b> Sandy soils and appropriate habitat is present. This species is known to occur in the area and in disturbed habitat.

	Scientific Name	Common Name	Fed/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
6.	<i>Diplacus vandenbergensis</i>	Vandenberg monkeyflower	FE/- G1/S1 1B.1	Apr-Jun	Open, sandy sites among shrubs. Often in disturbed areas in chaparral, cismontane woodland, and coastal dunes. Elevation range: 200 – 400 feet.	<b>Moderate.</b> Suitable open areas in scrub habitat are present in the Survey Area.
7.	<i>Erigeron sanctarum</i>	Saints' Daisy	-/ G3/S3 4.2	Mar-Jul	Sandy sites, coastal scrub or woodland	<b>Low.</b> Suitable habitat with sandy soils is present, though known occurrences are over 6 miles west of the Property.
8.	<i>Horkelia cuneata</i> var. <i>puberula</i>	Mesa horkelia	-/ G4T1/S1 1B.1	Feb-Sep	Dry, sandy coastal chaparral. Elevation range: 200 – 2,900 feet.	<b>Moderate.</b> Suitable sandy soils and oak woodland are present and <i>Horkelia</i> sp. was documented in the Survey Area.
9.	<i>Monardella sinuata</i> subsp. <i>sinuata</i>	Southern curly-leaved monardella	-/ G3T2/S2 1B.2	Apr-Sep	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub (openings). Sandy soils. Elevation range: 0 – 985 feet.	<b>Low.</b> Marginally suitable habitat (sandy soil) is present in the Survey Area (County Comment 5.2).
10.	<i>Mucronea californica</i>	California Spineflower	-/ G3/S3 4.2	Mar-Aug	Chaparral, cismontane woodland, coastal dunes, coastal scrub, valley and foothill grassland. Sandy soils.	<b>Moderate.</b> Suitable coastal scrub and agricultural habitats with sandy soils are present in the Survey Area.
11.	<i>Prunus fasciculata</i> var. <i>punctata</i>	Sand Almond	-/ G5T4/S4 4.3	Mar-Apr	Sandy soils, scrubland, oak woodland	<b>Moderate.</b> Sandy soils and oak woodland habitat are present. Species known to occur within 6 miles of the Property.

Scientific Name	Common Name	Fed/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
12. <i>Scrophularia atrata</i>	Black-flowered figwort	-/- G2?/S2? 1B.2	Mar-Jul	Calcium and diatom-rich soils in chaparral, coastal dunes, coastal scrub, and riparian woodland. Elevation range: 0 – 1,300 feet.	<b>Low.</b> Suitable scrub habitat is present in the Survey Area, though sandy soils are not optimal to support this species.

See Appendix C for status and rank definitions. See Section 2 for potential to occur definitions.

### **3.2 Wildlife Resources**

Updated research on special status plant occurrences conducted within the designated search area (see Methods) determined 35 special status animals are known to occur in the region (Appendix D). Review of relevant literature (e.g., additional biological reports of the area) and data (e.g., various published/online resources listed in Methods section) determined that no additional special status wildlife species have potential to occur on or near the Property that were not formerly addressed in the Revised BRA (Storrer 2020).

Table 3 lists seven special status animal species for which appropriate habitat conditions exist, and therefore could potentially occur in the Survey Area. Federal and California State status, Global and State rank, and CDFW listing status for each species are given. Habitat (from CNDDDB) preference, potential for occurrence on site, detection of the species within the Study Area, and effect of proposed activity are also provided. Special status and scientific names as referenced from the CDFW Special Animals List (CDFW 2021) and CNDDDB have also been reviewed and updated in the following tables (Table 3 and Table 4; County Comment 5.1; SB County 2020). Species are listed alphabetically by scientific name.

**TABLE 3. SPECIAL STATUS ANIMALS WITH POTENTIAL TO OCCUR**

Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
1. <i>Aimophila ruficeps canescens</i>	Southern California Rufous-Crowned Sparrow	-/- G5T3/S3 WL	Resident in Southern California coastal sage scrub and mixed chaparral.	<b>Present.</b> One adult was observed singing from a perch near the stock pond during April 2019 survey (Storrer 2019).
2. <i>Ambystoma californiense</i>	California Tiger Salamander	FT/CT G2G3/S2S3 WL	Need underground refuges, ground squirrel burrows & vernal pools or other seasonal water for breeding.	<b>High.</b> Known CTS Breeding Pond LOAL-40 near the Property was confirmed to have larval CTS during April 2019 aquatic survey (Storrer 2019).
3. <i>Anniella pulchra</i>	Northern California Legless Lizard	-/- G3/S3 SSC	Sandy or loose loamy soils under coastal scrub or oak trees. Soil moisture essential.	<b>High.</b> Suitable habitat and sandy soils are present in the Survey Area. Unlikely to occur in the disturbed habitat of the Project area.
4. <i>Rana draytonii</i>	California Red-Legged Frog	FT/- G2G3/S2S3 SSC	Lowlands and foothills in or near sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks for larval development.	<b>Moderate.</b> CRLF have potential to use CTS pond LOAL-40. Nearest occurrence is 1.4 miles south of the Survey Area (CNDDDB #1029). Not likely to be found in Project area.
5. <i>Salvadora hexalepis virgulata</i>	Coast Patch-Nosed Snake	-/- G5T4/S2S3 SSC	Require small mammal burrows for refuge and overwintering sites.	<b>Low.</b> Suitable scrub habitat is present though not likely to occur in the Survey Area based on regional scarcity.
6. <i>Spea hammondi</i>	Western Spadefoot	-/- G3/S3 SSC	Grassland and woodland habitats with vernal pools for breeding. Most of year spent underground.	<b>Moderate.</b> Spadefoot toads have potential to use CTS pond LOAL-40. Nearest occurrence is 1.4 miles south of the Survey Area (CNDDDB #46). Not likely to be found in Project area.
7. <i>Taxidea taxus</i>	American Badger	-/- G5/S3 SSC	Needs friable soils in open ground with abundant food source such as California ground squirrels.	<b>Moderate.</b> Suitable foraging and denning habitat is present in the Survey Area and nearest occurrences is 1 mile southwest (CNDDDB #100).

See Appendix D for status and rank definitions. See Section 2 for potential to occur definitions.

**TABLE 4. UPDATED WILDLIFE LIST (COUNTY COMMENT 5.1)**

Scientific Name	Common Name	Special Status	Habitat Type
<b>Birds – 5 Species</b>			
<i>Corvus corax</i>	Common raven	None	Variety of habitats
<i>Hirundo rustica</i>	Barn swallow	None	Riparian, grasslands, lakes
<i>Haemorhous mexicanus</i>	House finch	None	Riparian, grasslands, chaparral, woodlands, urban
<i>Setophaga coronata</i>	Yellow-rumped Warbler	None	Coniferous and mixed woodland (breeding); shrubby areas and parks (winter)
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	WL	Grassy or rocky slopes with sparse low bushes; open pine-oak woods, chaparral, coastal scrub



## 4 ENVIRONMENTAL IMPACT ANALYSIS

Pursuant to Chapter 35.42.075.C.8 of the County Land Use Development Code (LUDC), the County Land Use Ordinance (CLUO) has adopted development standards and guidelines for cannabis cultivation projects. Consistent with CEQA, the CLUO’s PEIR (AMEC 2017) defines three “Additional Standards” for biological resources that provide the framework for reducing biological impacts. These “Additional Standards” adopted in Appendix H of the LUDC (SB County 2020) describe the preparation thresholds for the following management plans listed below. Implementation of each management plan, as it pertains to potential Project impacts, is designed to satisfy proposed mitigation set forth by the County in Section 3.4.4 of the PEIR:

- MM BIO-1a. Tree Protection Plan (TPP)
- MM BIO-1b. Habitat Protection Plan (HPP)
- MM BIO-3. Wildlife Movement Plan (WMP)

Mitigation is required for impacts that are considered potentially significant under CEQA, including impacts to sensitive or listed species and sensitive vegetation communities. The proposed cannabis cultivation project at Santa Rita Holdings, LLC could affect common and special status biological resources, including sensitive plants and wildlife. Our review of the biological resources on the Property as reported in Storrer (2019 and 2020) and potential impacts from the proposed Project indicate that potential impacts to biological resources are less than significant or would be reduced to less than significant by implementing avoidance, minimization, and mitigation measures prescribed in the Additional Standards in Appendix H of the LUDC, as listed above (refer to Table 55 and Sections 4.1, 4.2, and 4.3, below).

Table 5 provides an overview of the biological resources on the Property, effects of the proposed project, and recommended mitigation measure(s).

**TABLE 5. IMPACTS AND MITIGATIONS SUMMARY**

<b>Biological Resource</b>	<b>Effect of Proposed Project</b>	<b>Mitigation Measure(s)</b>
Active Agriculture Agriculture California Sage Brush Scrub Ornamental/Landscape Plantings Ruderal/Disturbed	Less than Significant with Mitigation for Protected Species	None Required (See Habitat Protection Plan HPP-1 through HPP-23 for sensitive plants and wildlife)
Coast Live Oak Woodland	No Effect	None Required (See Tree Protection Plan TPP-1 and TPP-2 for individual oak trees)
Special Status Plants	No Effect	None Required
Oak Trees	No Effect	Tree Protection Plan TPP-1 through TPP-3

<b>Biological Resource</b>	<b>Effect of Proposed Project</b>	<b>Mitigation Measure(s)</b>
Nesting Birds	Less than Significant with Avoidance & Minimization Measure Incorporated	Habitat Protection Plan HPP-1
California Tiger Salamander	Less than Significant with Avoidance, Minimization, and Mitigation Measure Incorporated	Habitat Protection Plan HPP-2 through HPP-23
Wildlife Movement Corridors	No Effect	Wildlife Movement Plan

#### **4.1 MM BIO-1a. Tree Protection Plan**

##### *4.1.1 Coast Live Oak Woodland and Individual Oak Trees*

The proposed Project would avoid coast live oak woodland and all individual oak trees (Figure 4; County Comment 6.1). No hoops or other structures would be constructed that would affect oak trees. The following standards shall be met to ensure oak tree protection during construction and operational activities:

- TPP-1** Site plans have been designed to include a 6-foot buffer from the edge of canopy dripline for each individual oak tree near cultivation areas and activities. Coast live oak woodland in the vicinity of the Project is not mapped as an Environmentally Sensitive Area (ESH) by County planning documents (County 2018) and therefore does not require larger setbacks than 6 feet from dripline (County Comment 5.3).
- TPP-2** During construction, all trees shall be protected by a fence located at least 6 feet outside of the dripline. Fencing shall be at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing.
- TPP-3** No irrigation is permitted within 6 feet of the dripline of any protected tree unless specifically authorized.

#### **4.2 MM BIO-1b. Habitat Protection Plan**

##### *4.2.1 Habitats*

A total of 2.22 acres of habitat would be impacted by the proposed Project (Table 6). Agriculture, California sagebrush scrub, and ruderal/disturbed habitats are not sensitive habitat types and do not require mitigation. Impacts to non-sensitive habitats that could potentially support special status wildlife and nesting birds can be avoided or minimized through measures listed below in Sections 4.2.3 and 4.2.4. No special status plants are known to occur in the Project area.

**TABLE 6. POTENTIAL HABITAT IMPACTS**

<b>Habitat Type</b>	<b>Permanent Impact (Acres)</b>
Active Agriculture	0.26
Agriculture	1.51
California sagebrush scrub	0.06
Coast Live Oak woodland	0.00
Ruderal/Disturbed	0.37
<b>Total Impacts</b>	<b>2.22</b>

#### 4.2.2 *Special Status Plants*

No special status plants were detected during botanical surveys conducted by Storrer Environmental in 2019 and 2020. The proposed Project would not impact special status plants (County Comments 4.2 and 6.3).

#### 4.2.3 *Nesting Birds*

Migratory non-game native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take (as defined therein) of all native birds and their active nests, including raptors and other migratory non-game birds (as listed under the Federal MBTA).

The Property supports both sensitive and common nesting bird species. Ground nests could occur throughout the agricultural and scrub habitat affiliated with the site, and oak woodland habitat and ornamental trees are present for tree nesting species. Cannabis activities could result in impacts to nesting birds by substantially limiting the reproductive capacity through losses of individuals and quantity or quality of nesting areas. The proposed fence installation is considered a permanent impact and could impact nesting birds if construction occurs during the nesting season (February 15 to August 31; County Comment 6.4). HPP-1 should be implemented to reduce potential impacts to nesting birds to less than significant, consistent with the PEIR analysis.

**HPP-1 Preconstruction Surveys.** If any ground disturbances will occur during the nesting bird season (February – mid-September), prior to any ground disturbing activity, surveys for active nests shall be conducted by a Department-approved biologist following CDFW approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted in a sufficient area around the work site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no buffer around nests of unlisted raptors shall be maintained until the

breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no disturbance buffer variance.

#### 4.2.4 *California Tiger Salamander*

California tiger salamander is known to occur in the vicinity and a known CTS breeding pond (LOAL-40) was evaluated as part of the original BRA (Storrer 2019 and 2020). The Project would affect 2.2 acres of low quality potential upland habitat for CTS. Consistent with the PEIR analysis, this effect is mitigable with implementation of a Habitat Protection Plan as outlined in Appendix H of the LUDC.

As discussed in Storrer 2020, the Applicant is initiating consultation with USFWS and CDFW for further guidance regarding protection and mitigation for potential impacts to CTS. It is expected that the project will obtain take coverage under the General Conservation Plan for Cultivation Activities (USFWS 2019). The General Conservation Plan includes 22 measures to avoid and minimize potential impacts to CTS. These 22 measures are provided here as HPP-2 through HPP-23 of MM BIO-1b Habitat Protection Plan.

- HPP-2** During the project planning phase, applicants will site all impacts as far away from known and potential California tiger salamander breeding habitats and avoid high quality upland and dispersal habitat as possible.
- HPP-3** At least 15 days prior to ground-disturbing activities, the applicant will submit the names and credentials of biologists and monitors to the Service for approval to conduct the minimization measures outlined below. Excluding an emergency activity, no project activities will begin until the applicant has received notice from the Service that the biologists and monitors are approved to do the work.
- HPP-4** A Service-approved biologist will conduct a biological resources training program for all construction workers and their contractors to minimize potential impacts to the California tiger salamander and sensitive habitats. Training will occur prior to initial ground disturbing -activities and be repeated, annually and as needed for new workers for the duration of each project covered by the permit. The training program will be reviewed and approved by the Service and will include a description of: (1) important biological resources within their project site, specifically California tiger salamander that have potential to occur within or adjacent to work areas; (2) the applicable avoidance and minimization measures; (3) the roles and responsibilities of personnel; and (4) communication protocols if California tiger salamanders are detected. Applicants who submit their training programs along with their permit applications should expect to receive an approval at the time they receive their Permit. Applicants who submit their training programs after they submit their permit application should expect to receive an approval within 30 days of receipt of the training program.
- HPP-5** A Service-approved biologist will periodically review and monitor ground disturbing activities and restoration efforts and will be responsible for ensuring that conditions of approval are being enforced and that success criteria are being

met. Except for emergency situations, a Service-approved biologist will have the authority to temporarily halt activities if permit requirements and conditions are not being met.

- HPP-6** Prior to ground disturbing activities, all grading limits and construction boundaries, including staging areas, parking, and stockpile areas, will be delineated and clearly marked in the field. All suitable California tiger salamander habitat located within 10 feet of ground disturbing activities will be delineated with specific sensitive species labeling (e.g., permanent signage stating, “No Entry —Sensitive Habitat.”). A service-approved biologist(s) will work with the Service to identify these areas.
- HPP-7** All proposed linear routes (i.e., roads and pipelines) will be reviewed and modified, if necessary, in the field to minimize impacts to the California tiger salamander with assistance by the on-site biologist or environmental monitor.
- HPP-8** Personnel will limit their vehicle use to existing routes of travel. Travelling off designated roads will be prohibited unless access is determined critical for a particular activity and the route has been flagged to avoid or minimize adverse effects.
- HPP-9** To minimize the potential for road mortality of California tiger salamander and their habitat, nighttime traffic will be minimized during the ground disturbing phase to the extent feasible; all hauling activities within habitat for covered wildlife will be restricted to daylight hours, defined as the hours after sunrise and before sunset.
- HPP-10** Except in areas with posted speed limits greater than 10 miles-per-hour, project-related vehicle speeds will not exceed 10 miles-per-hour when driving within California tiger salamander habitat.
- HPP-11** Prior to moving vehicles or equipment, personnel will look under the vehicles or equipment for the presence of California tiger salamanders. If a California tiger salamander or any other wildlife species is observed, the vehicle will not be moved until the animal has vacated the area on its own accord or has been relocated out of harm’s way in accordance with HPP-13 (Measure 12).
- HPP-12** A Service-approved biologist will conduct pre-activity surveys of California tiger salamander habitat within project disturbance boundaries immediately prior to the onset of any ground disturbance associated with the project to determine if any California tiger salamander individuals are present, and to refine the final habitat mitigation acreages. The Service-approved biologist will monitor ground disturbing activities in the vicinity of habitats to be avoided. Upon completion of initial ground disturbance, the biologist or monitor will periodically (minimum twice per week) visit the project site throughout the ground disturbing period to ensure that impacts to the project site are in compliance with the permit. After periods of rain, a Service-approved biologist will conduct daily pre-activity surveys to ensure no California tiger salamanders have migrated into the work area prior to ground disturbing activities resuming. No construction work will be initiated until a Service-approved biologist

determines that the work area is clear of California tiger salamanders. Should any California tiger salamanders be observed within harm's way, the animal will be allowed to vacate the area on its own accord or be relocated in accordance with HPP-13 (Measure 12).

**HPP-13** Any California tiger salamander or individuals of other wildlife species will be allowed to vacate the project areas on its own accord under the observation of a Service-approved biologist. If any California tiger salamanders or individuals of other wildlife species does not relocate on their own, or if they are in harm's way, they will be relocated out of harm's way to nearby suitable habitat, similar to that in which it was found, and outside the project area. Only a Service-approved biologist will relocate California tiger salamanders. The biologists conducting relocation activities will follow the Declining Amphibian Task Force Fieldwork Code of Practice: ([https://www.fws.gov/southwest/es/NewMexico/documents/SP/Declining\\_Amphibian\\_Task\\_Force\\_Fieldwork\\_Code\\_of\\_Practice.pdf](https://www.fws.gov/southwest/es/NewMexico/documents/SP/Declining_Amphibian_Task_Force_Fieldwork_Code_of_Practice.pdf)).

A Service-approved biologist will relocate any California tiger salamanders found within the project footprint to an active rodent burrow system located no more than 300 feet outside of the project area unless otherwise approved by the Service. The individuals will be handled with clean and wet hands. During relocation they will be placed in a clean, covered plastic container with a wet non-cellulose sponge. Captured individuals will be relocated immediately; individuals will not be stored for lengthy periods or in heated areas. The relocation container will be kept out of direct sunlight.

A Service-approved biologist will monitor relocated California tiger salamanders until they enter a burrow and are concealed underground or otherwise deemed safe in the relocation area by the biologist. Relocation areas will be identified by the Service-approved biologist based on the best suitable habitat available. The Service-approved biologist will document both the capture site and the relocation site by photographs and GPS positions. The California tiger salamander will be photographed and measured (Snout-Vent) for identification purposes prior to relocation. All documentation will be provided to the Service within 24 hours of relocation.

**HPP-14** Rodent burrows within the project areas that overlap California tiger salamander habitat will be excavated by a Service-approved biologist using hand tools until it is certain that the burrows are unoccupied. In lieu of burrow excavation, steel plates or plywood may also be utilized to protect small mammal burrows from ground disturbance. Plates and plywood will be removed nightly and will be removed if work is scheduled to cease for consecutive days. Any individual California tiger salamanders that are encountered will be allowed to vacate the area on their own accord or be relocated out of harm's way in accordance with HPP-13 (Measure 12).

**HPP-15** Exclusionary silt fencing (or other suitable fence material) will be installed at the discretion of a Service-approved biologist to minimize the potential for California tiger salamanders to enter the worksite. Exclusionary fencing will be

maintained for the duration of the project. If a California tiger salamander or other wildlife species is observed within an enclosed worksite, a portion of the fencing will be removed to allow the individual to vacate the area on its own. Alternatively, the animal may be relocated out of harm's way in accordance with HPP-13 (Measure 12).

- HPP-16** All construction and sediment control fencing will be inspected each workday during construction activities to ensure they are functioning properly.
- HPP-17** Steep-walled excavations (e.g., trenches) that may act as pitfall traps will be inspected for wildlife at least once per day and immediately before backfilling. In lieu of daily inspections (weekends, etc.), exclusionary fencing, covers, ramps, or similar measure will be taken to prevent wildlife entrapment (refer to WMP-1 below in Section 4.3).
- HPP-18** Open pipe segments will be capped or sealed with tape (or equivalent material) nightly, or otherwise stored at least three feet above ground. Should a pipe segment become occupied by a California tiger salamander or any other wildlife species, the animal will be allowed to vacate the pipe on its own or will be removed and relocated in accordance with HPP-13 (Measure 12).
- HPP-19** If covered activities must occur during the rainy season, permittees will not work during rain events, 48 hours prior to significant rain events (>0.5 inch), or during the 48 hours after these events, to the extent practicable. If work must occur 48 hours prior to significant rain events (>0.5 inch), or during the 48 hours after these events, a Service-approved biologist will conduct a pre-activity survey to ensure that the work area is clear (refer to HPP-11 (Measure 10) above).
- HPP-20** The applicant will ensure that all staging areas, equipment storage areas, stockpile sites and refueling areas are located at least 100 feet from surface water bodies and wetland habitats to minimize the potential for releases into surface water or wetland habitat. In lieu of the 100-foot buffer, secondary containment measures may be employed to prevent contamination of soil and water.
- HPP-21** When working in areas with a predominance of native plants, the upper layer of topsoil material (6 inches) will be segregated during excavations to preserve the seed bank. The preserved topsoil will be covered to protect it from erosion and invasion of non-native plants until completion of the activity, when the topsoil will be replaced in the affected area. Existing access roads are not subject to this measure.
- HPP-22** Disturbed areas will be restored and stabilized to reflect pre-existing contours and gradients to the extent practicable. Erosion and sediment controls (e.g., silt fences, fiber rolls, sandbags) will be installed, where necessary, utilizing weed-free materials in areas with a predominance of native plants. Where necessary, restored areas will be maintained and monitored, including weed removal (focused on noxious weeds and excluding non-native annual grasses). All planting and seeding will occur the first year after construction is complete,

after the first significant rain event of the year (i.e., more than 0.25 inches of precipitation).

- HPP-23** Upon locating California tiger salamander individuals that may be dead or injured as a result of project-related activities, notification will be made within 72 hours to the Service’s Ventura Field Office at (805) 644-1766.

#### **4.3 MM BIO-3. Wildlife Movement Plan**

No impacts to wildlife corridors are expected as a result of the Project (refer to Section 6.7 of Revised BRA, Storrer 2020). To comply with stormwater regulations (refer to CDFW comments; CDFW 2020), hoop house coverings must be removed to allow for rainwater percolation and decrease runoff that could potentially affect water quality on and off site. Removal of plastic hoop house coverings will be determined by rain events and duration of such events during the rainy season (from November to February).

Potential impacts to wildlife movements, including California tiger salamander, can be mitigated to less than significant, consistent with the analysis in the PEIR, by implementing MM BIO-3 Wildlife Movement Plan. The Owner/Applicant shall implement the avoidance and minimization measures and all associated components included in the Wildlife Movement Plan (WMP) included in the Addendum to the Biological Resource Assessment (A&M March 2021), and any subsequent modifications or revisions as required by CDFW and/or USFWS.



## **5 CONCLUSION**

---

The proposed Project has the potential to impact sensitive biological resources, including nesting birds and special status wildlife. With incorporation of avoidance, minimization, and mitigation described in Section 4 above, Project-related impacts to sensitive biological resources would be less than significant and consistent with analyses in the PEIR. County comments (SB County 2020) have been addressed herein and action items and their locations within this document are outlined in Appendix E.

## 6 REFERENCES

---

- [A&M] Althouse and Meade, Inc. 2020a. Biological Resource Assessment for The Price Ranch, LLC. Cannabis Cultivation Land Use Permit Case No. 19LUP-00000-00114. Santa Barbara County. July 2020.
- [A&M] Althouse and Meade, Inc. 2020b. Biological Resource Assessment for La Laguna Los Alamos. Cannabis Cultivation Land Use Permit. Santa Barbara County. December 2020.
- [A&M] Althouse and Meade, Inc. 2021. Biological Resource Assessment for Tierra Tambor *in prep.* Cannabis Cultivation Land Use Permit Case No. 19LUP-015. Santa Barbara County. February 2021.
- [AMEC] Amec Foster Wheeler, Environmental & Infrastructure, Inc. 2017. Cannabis Land Use Ordinance and Licensing Program Final Environmental Impact Report. December 2017.
- Baldwin BG, Goldman DH, Keil DJ, Patterson R, Rosatti TJ, Dieter H, Wilken DH, editors. 2012. The Jepson manual: vascular plants of California. 2nd ed. Berkeley (CA): UC Press.
- [CDFW] California Department of Fish and Wildlife. 2018a. Guidelines for assessing the effects of proposed projects on rare, threatened, and endangered plants and natural communities. 2nd ed. Revised May 8, 2000.
- [CDFW] California Department of Fish and Wildlife. 2018b. Protocols for surveying and evaluating impacts to special status native plant populations and natural communities. California Department of Fish and Wildlife. March 20, 2018. Available from: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.
- [CDFW] California Department of Fish and Wildlife. 2021a. California Natural Diversity Database (CNDDB) - Commercial. [accessed February 2021].
- [CDFW] California Department of Fish and Wildlife, Natural Diversity Database. 2021b. Special vascular plants, bryophytes, and lichens list, periodic publication [Internet]. Sacramento (CA): California Department of Fish and Wildlife. February 2021. Available from <http://www.dfg.ca.gov/wildlife/nongame/list.html>.
- [CDFW] California Department of Fish and Wildlife. Natural Diversity Database. 2021. Special animals list, periodic publication [Internet]. Sacramento (CA): California Department of Fish and Wildlife. February 2021. Available from <http://www.dfg.ca.gov/wildlife/nongame/list.html>.
- [CNPS] California Native Plant Society, Rare Plant Program. 2021. Inventory of rare and endangered plants of California. Sacramento (CA): California Native Plant Society; [online edition, v8-03 0.39]. Available from <http://www.rareplants.cnps.org>. Accessed February 2021.
- [CNPS] California Native Plant Society. 2001. CNPS botanical survey guidelines [Internet]. Sacramento (CA): California Native Plant Society. Revised June 2, 2001. Available from <https://www.cnps.org/plant-science/field-protocols-guidelines>.
- [CCH] Consortium of California Herbaria [Internet] 2021. Berkeley (CA): Regents of the University of California; [accessed February 2021]. Available from <http://ucjeps.berkeley.edu/consortium/>.

- Jepson Flora Project (eds.). 2019. Jepson eFlora. [accessed February 22, 2021]. <http://ucjeps.berkeley.edu/eflora/>.
- [NAIP] National Agriculture Imagery Program. 2018. Aerial photomosaic of Santa Barbara County [Internet]. Washington (DC): United States Department of Agriculture (USDA); Available from <https://www.fsa.usda.gov/programs-and-services/aerial-photography/index>.
- [SB County] County of Santa Barbara Planning and Development. 2010. Conservation Element Oak Tree Protection in the Inland Rural Areas of Santa Barbara County. Republished May 2010.
- [SB County] County of Santa Barbara Planning and Development. 2017. Final Environmental Impact Report (FEIR) for the Cannabis Land Use Ordinance and Licensing Program, Volumes I and II. SCH No. 2017071016. December 2017.
- [SB County] County of Santa Barbara Planning and Development. 2018. Conservation Element.
- [SB County] County of Santa Barbara Planning and Development. 2019. Santa Barbara Land Use and Development Code (LUDC) §35.42.075 (Cannabis Regulations). Published June 2018. Revised August 2019.
- [SB County] County of Santa Barbara Planning and Development. 2020. Biological Assessment Peer-review Comments. Santa Rita Cannabis Cultivation, Case No. 19CUP-11111-00018. October 23.
- [Storrer] Storrer Environmental Services, LLC. 2019. Biological Resources Assessment for 5423 Santa Rita Road (APN 099-110-060), Santa Barbara County, California. April 2019.
- [Storrer] Storrer Environmental Services, LLC. 2020. Revised Biological Resources Assessment Cannabis Cultivation Project (19CUP-00000-00019) 5423 Santa Rita Road (APN 099-110-060), Santa Barbara County, California. Revised August 2020.
- [USFWS] U.S. Fish and Wildlife Service. 2000. Guidelines for conducting and reporting botanical inventories for federally listed, proposed, and candidate plants. Washington (DC): U.S. Fish and Wildlife. April 2000. Available from: <https://www.fws.gov/ventura/docs/species/protocols/botanicalinventories.pdf>.
- [USFWS] U.S. Fish and Wildlife Service. 2016. Recovery plan for the Santa Barbara County Distinct Population Segment of the California tiger salamander (*Ambystoma californiense*). U.S. Fish and Wildlife Service, Pacific Southwest Region, Ventura, California. vi + 87 pp.
- [USFWS] U.S. Fish and Wildlife Service. 2019. General Conservation Plan for Cultivation Activities. Santa Barbara County, California. September 2019.
- [USFWS] U.S. Fish and Wildlife Service, National Wetland Inventory. Last updated October 9, 2019. Available from <https://www.fws.gov/wetlands/data/Mapper.html>. Accessed February 22, 2021.
- [USFWS] U.S. Fish and Wildlife Service. 2021. USFWS Threatened & Endangered Species Active Critical Habitat Report. Available online at <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>. February 22, 2021.

## **7 APPENDICES**

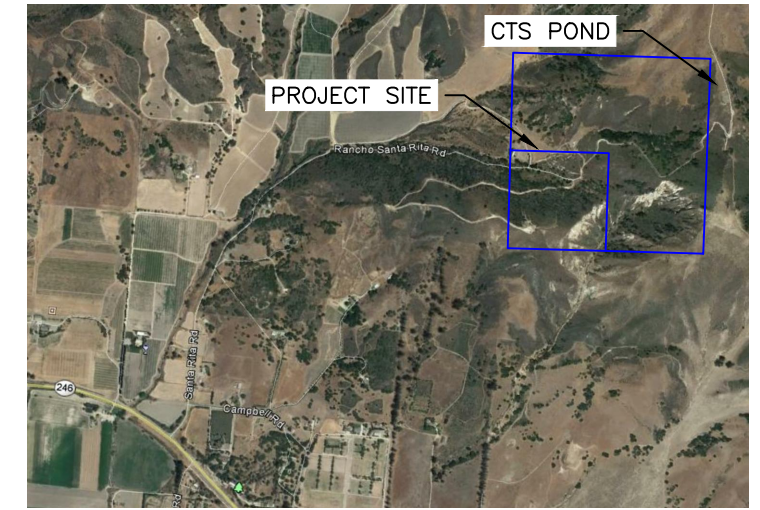
---

- Appendix A. Site Plan for Santa Rita Project APN 099-110-060
- Appendix B. Figures
- Appendix C. Special Status Plants Reported from the Region
- Appendix D. Special Status Animals Reported from the Region
- Appendix E. County Comments and Actions Addressed

**APPENDIX A. SITE PLAN FOR SANTA RITA PROJECT APN 099-110-060**



APN 099-110-060



VICINITY MAP

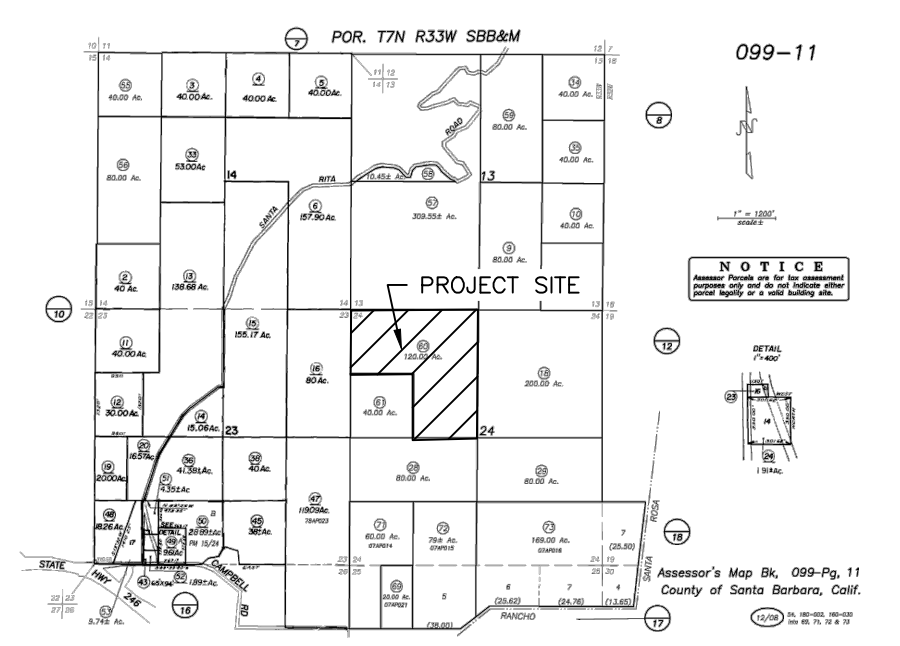
SITE INFORMATION

APN: 099-110-060
ADDRESS: 5423 RANCHO SANTA RITA ROAD, LOMPOC, SANTA BARBARA COUNTY, CA
CLIENT INFO: SANTA RITA HOLDINGS c/o JASON HILLENBRAND
PARCEL SIZE: 5,227,200 S.F./120 AC
FLOOD ZONE: N/A
ZONING: AG-II-100
AG PRESERVE: N/A

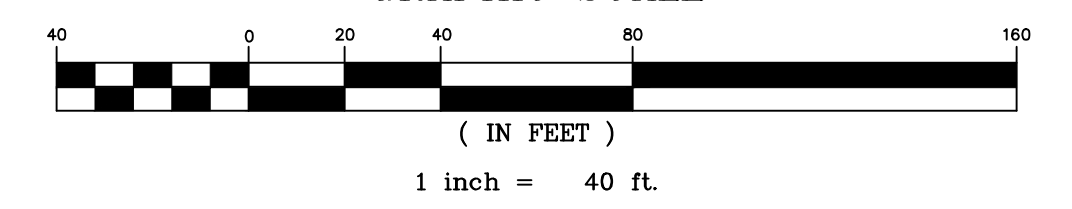
Table with 3 columns: CULTIVATION AREA, TOTAL ACREAGE / SQUARE FEET, AVERAGE SLOPE. Rows include HOOP AREA (1.88 AC / 81,875 SF), OUTDOOR AREA (NO HOOPS) (0.55 AC / 24,136 SF), and NURSERY AREA (0.11 AC / 4,778 SF).

LEGEND

- Legend items: PROPERTY LINE, DEER FENCE, EX. ACCESS ROAD, EX. BUILDING, EX. CULTIVATION AREA, EX. 2" WATER LINE SUBSURFACE, EX. 2" IRRIGATION WATER LINE, 50-FOOT ESH SETBACK, TOP OF BANK, NO HOOPS CULTIVATION AREA, EX. TREE, TREE PROTECTION, NO HOOPS CULTIVATION AREA, NURSERY AREA NOT UNDER HOOPS AREA.



GRAPHIC SCALE



TRANSPORTATION DEMAND MANAGEMENT PLAN:

THERE WILL BE 3 FULL TIME EMPLOYEES WHO RESIDE ON THE PROPERTY. DAILY TRIPS BY THESE EMPLOYEES IS LIMITED TO LEAVING THE PROPERTY TO PURCHASE SUPPLIES OR GROCERIES. ESTIMATED TOTAL DAILY TRIPS IS 0-1. NO INCREASE IN DAILY TRIPS BEYOND THE EXISTING FARMING USE.

ROUGHLY 8-12 PART TIME EMPLOYEES WOULD BE USED SEASONALLY, AND WOULD BE BROUGHT TO THE SITE VIA THEIR LABOR CONTRACTOR IN A CARPOOL VAN. DAILY TRIPS FOR PART TIME EMPLOYEES WOULD BE TWO (2), ONCE IN THE MORNING ARRIVING AT THE PROPERTY AND ONCE IN THE EVENING LEAVING THE PROPERTY.

THE NUMBER OF SEASONS WOULD BE MAXIMUM OF THREE (3). THEY ARE APRIL-JUNE, JUNE-OCTOBER, AND OCTOBER- DECEMBER. PART-TIME EMPLOYEES WOULD ARRIVE AT THE BEGINNING OF EACH SEASON FOR PLANTING, AND AT THE END OF EACH SEASON FOR HARVESTING. PLANTING AND HARVESTING SESSIONS ARE GENERALLY 2-3 DAYS LONG.

HOURS OF OPERATION ARE 6:00 AM - 4:00 PM.

WATER LINE EASEMENT SOUTH OF PROPERTY

WATER LINE SHOWN ON PLAN ARE PART OF THE APPLICANT'S AGREEMENT WITH THE VISTA HILLS WATER DISTRICT. THE APPLICANT HAS PROVIDED A SEPARATE DOCUMENT FROM THE DISTRICT INDICATING THIS AGREEMENT OF THEIR CURRENT AND FUTURE SERVICES.

APN 099-110-061

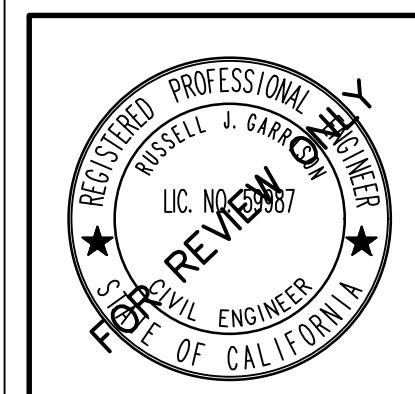


Table with columns: DESIGNED BY, CHECKED BY, REVISIONS, DATE, DESCRIPTION. Includes entries for G.C., R.J.G., and revision dates 11/6/20 and 12/4/20.

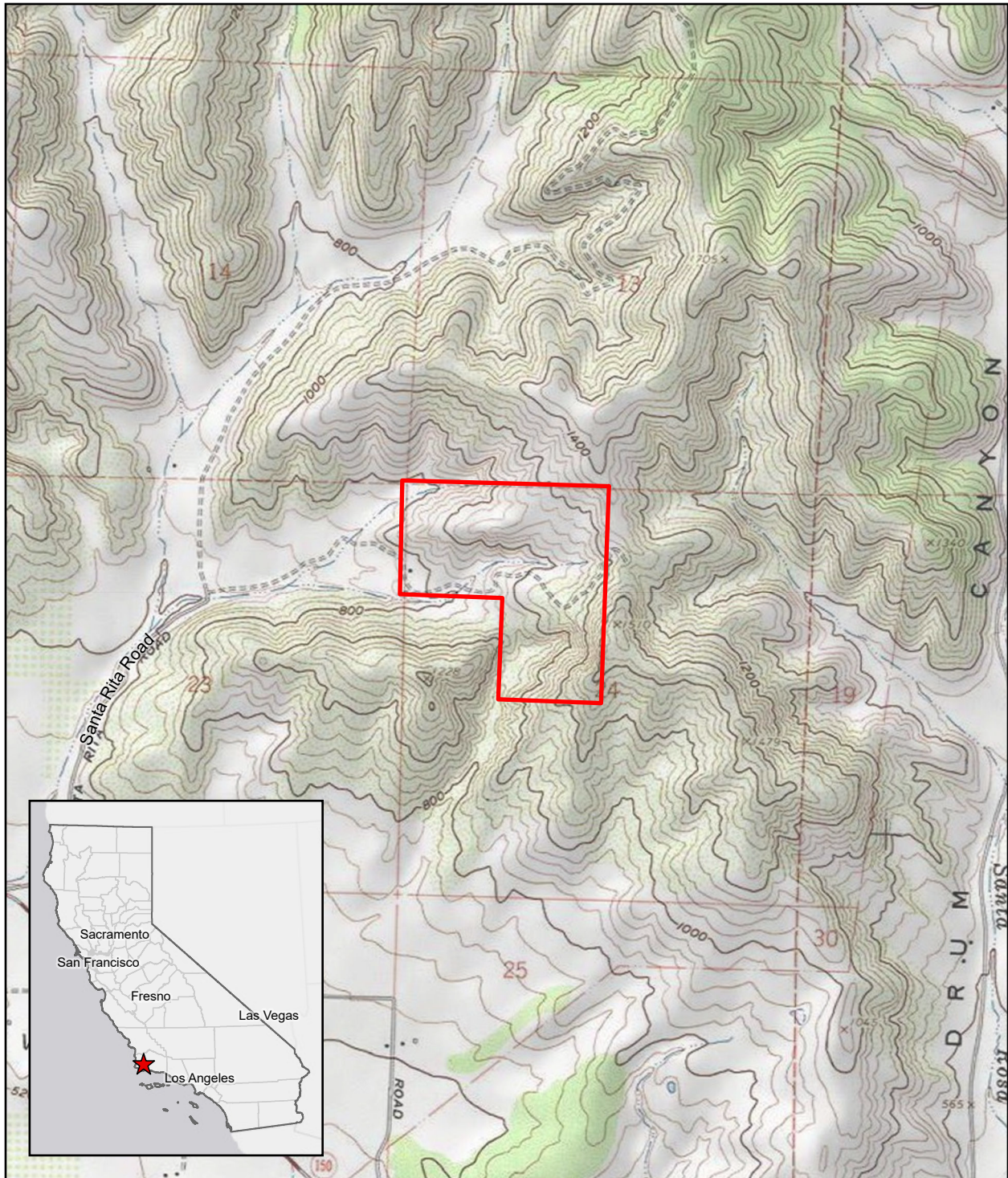
Project title block: SITE PLAN SANTA RITA PROJECT, COUNTY OF SANTA BARBARA, CALIFORNIA. Includes Bethel Engineering logo and contact information.



## **APPENDIX B. FIGURES**



- Figure 1. USGS Topographical Map
- Figure 2. Aerial Photograph
- Figure 3. Biological Resources
- Figure 4. Biological Resources and Impact Assessment

**Figure 1. United States Geological Survey Topographic Map**



Legend

 Parcel Boundary

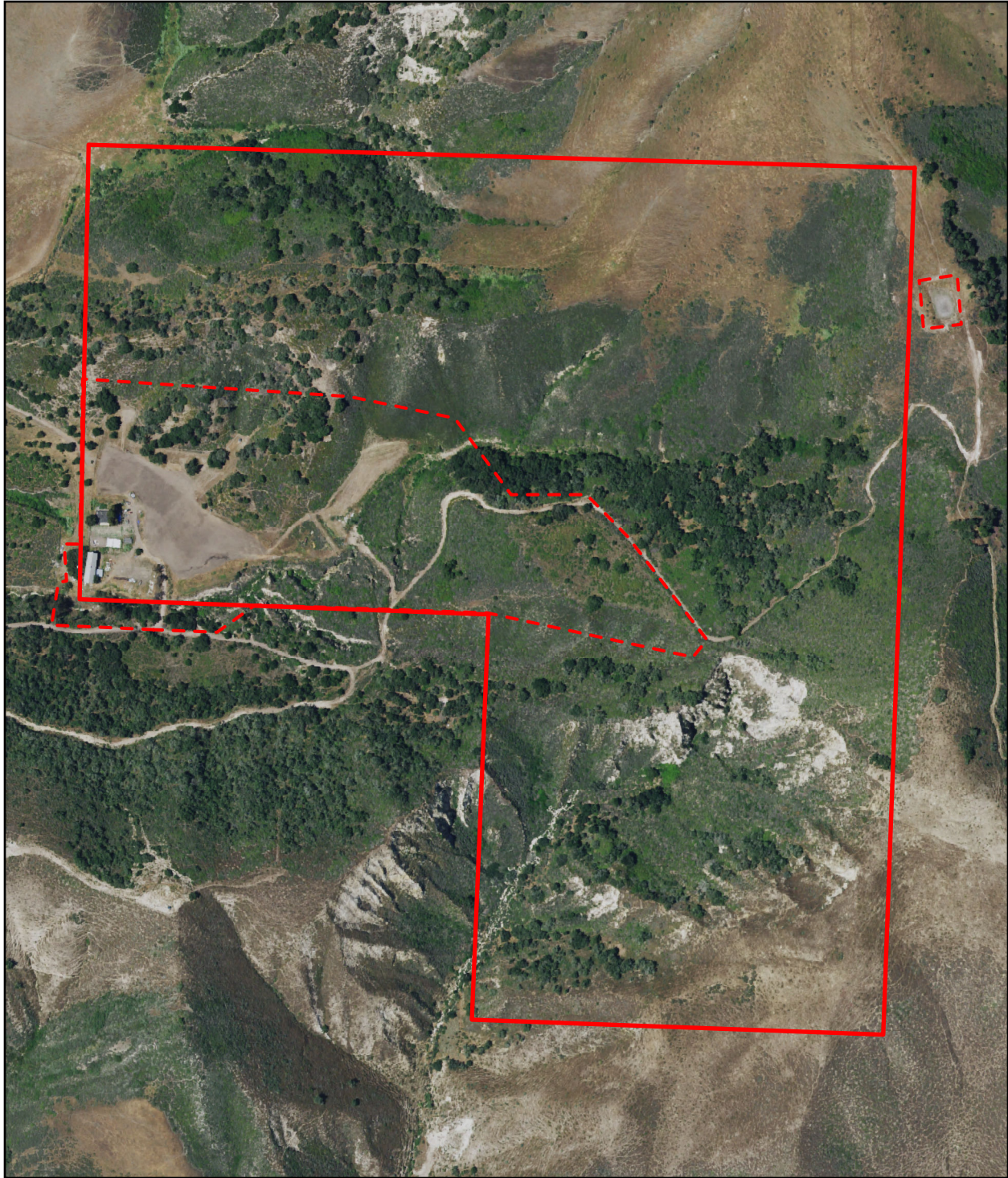
N Scale: 1:24,000  
  
0 1,000 2,000 Feet  


**Santa Rita Holdings**  
Map Center: 120.30916°W 34.67488°N  
Lompoc, Santa Barbara County



USGS Quadrangle: Los Alamos



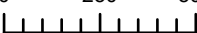
**Figure 2. Aerial Photograph**



Legend

 Parcel Boundary  Survey Area



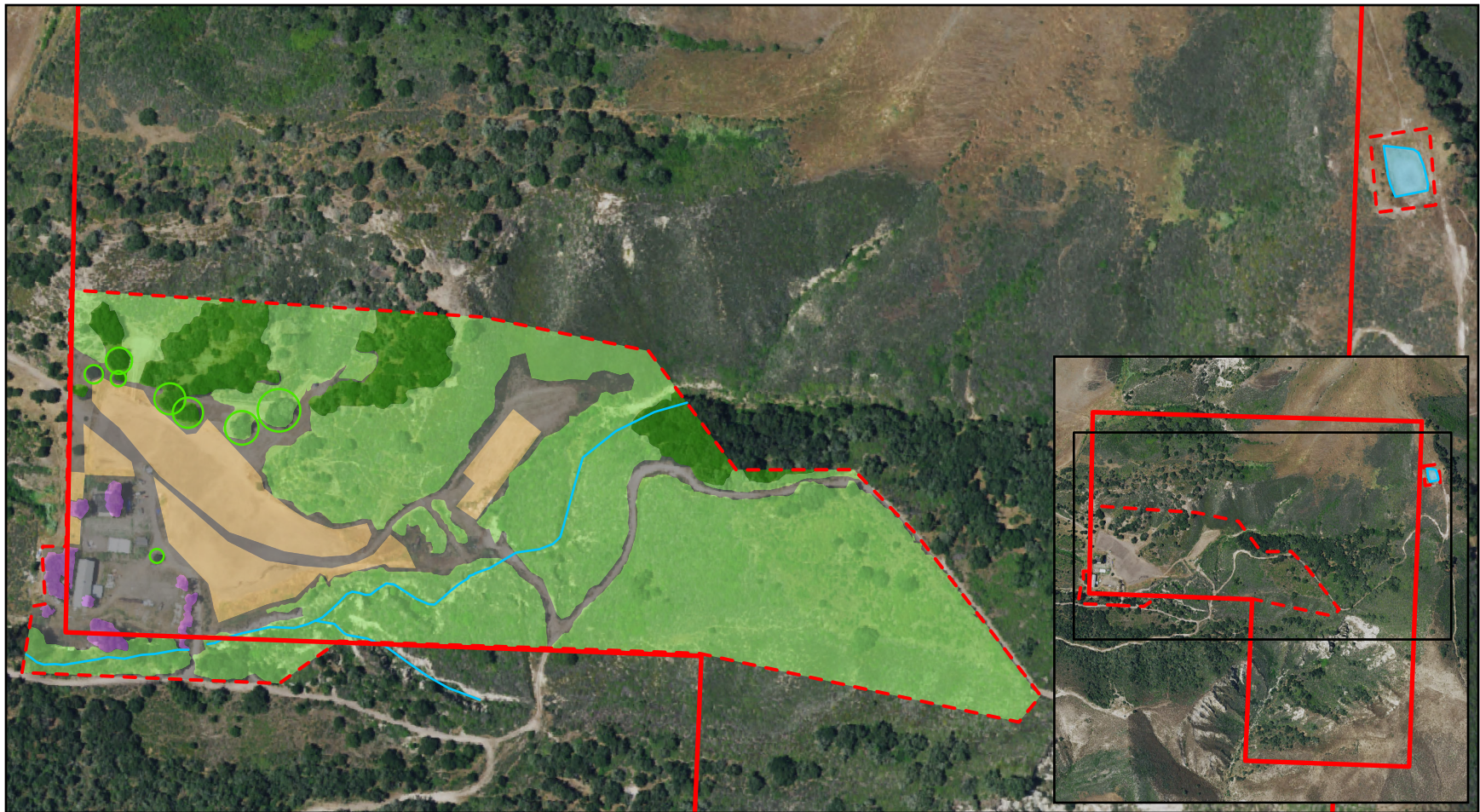
0 250 500 Feet  


**Santa Rita Holdings**  
Map Center: 120.30916°W 34.67488°N  
Lompoc, Santa Barbara County









Imagery Source: USDA NAIP, 05/21/2020

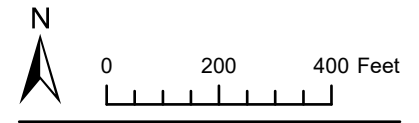


**Figure 3. Biological Resources**



Legend

- |  |   |   |   |
|--|---|---|---|
|  Parcel Boundary    |  Known CTS Breeding Pond (LOAL-40)   |  California Sagebrush Scrub (16.7 acres) |  Ornamental/Landscape Plantings (0.4 acre) |
|  Survey Area        |  Oak Canopy Dripline (6-foot buffer) |  Coast Live Oak Woodland (2.5 acres)     |  Ruderal/Disturbed (4.9 acres)             |
|  Ephemeral Drainage |  Agriculture (3.1 acres)             |   |   |
















**Santa Rita Holdings**  
 Map Center: 120.3091°W 34.67608°N  
 Lompoc, Santa Barbara County  
 Imagery Source: USDA NAIP, 05/21/2020

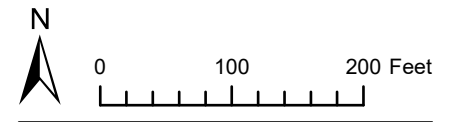


**Figure 4. Biological Resources and Impact Assessment**



**Legend**

- |   |   |   |
|---|---|---|
|  Parcel Boundary           |  Ephemeral Drainage 50-Foot Setback  |  California Sagebrush Scrub (0.08 acre impacted) |
|  Survey Area               |  Known CTS Breeding Pond (LOAL-40)   |  Coast Live Oak Woodland                         |
|  Proposed Cultivation Area |  Oak Canopy Dripline (6-foot buffer) |  Ornamental/Landscape Plantings                  |
|  Proposed Fencing          |  Agriculture (1.77 acres impacted)   |  Ruderal/Disturbed (0.37 acre impacted)          |
|  Ephemeral Drainage        |   |   |



**Santa Rita Holdings**  
 Map Center: 120.31153°W 34.6758°N  
 Lompoc, Santa Barbara County

Imagery Source: USDA NAIP, 05/21/2020

---

**APPENDIX C. SPECIAL STATUS PLANTS REPORTED FROM THE REGION**


---

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
1.	<i>Abronia maritima</i>	Red Sand-Verbena	-/ G4/S3? 4.2	Feb-Nov	Coastal dunes. <100 m.	<b>No Potential.</b> Suitable coastal dune habitat is not present in the Survey Area.
2.	<i>Agrostis hooveri</i>	Hoover's Bent Grass	-/ G2/S2 1B.2	Apr-Jul	Dry sandy soils, open chaparral, oak woodland. <600 m.	<b>Low.</b> Potentially suitable habitat is present, but there are no known occurrences within the vicinity of the Survey Area.
3.	<i>Amsinckia douglasiana</i>	Douglas' Fiddleneck	-/ G4/S4 4.2	Mar-May	Valley and foothill grassland. Dry habitats with unstable shaly sedimentary slopes. 150-1600 m.	<b>No Potential.</b> Suitable habitat (shaly slopes) is not present in the Survey Area and no known records within ten miles.
4.	<i>Ancistrocarphus keilii</i>	Santa Ynez Groundstar	-/ G1/S1 1B.1	Mar-Apr	Sandy soils, chaparral bordering oak woodland, under shrubs	<b>Low.</b> Suitable sandy soils and woodland or shrub habitat is present. All occurrences are historic and presence is unlikely.
5.	<i>Arctostaphylos crustacea</i> subsp. <i>eastwoodiana</i>	Eastwood's Brittle-Leaf Manzanita	-/ G4T2/S2 1B.1	Mar	Maritime chaparral, closed-cone conifer forest. Sandy soils. <650 m.	<b>No Potential.</b> Suitable habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.
6.	<i>Arctostaphylos pechoensis</i>	Pecho Manzanita	-/ G2/S2 1B.2	Nov-Mar	Chaparral, conifer forest. Shale outcrops. <500 m.	<b>No Potential.</b> Suitable habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.

---

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
7.	<i>Arctostaphylos purissima</i>	La Purisima Manzanita	-/ G2/S2 1B.1	Nov-May	Chaparral. Sandstone outcrops, sandy soils. <300 m.	<b>No Potential.</b> Survey Area is outside known range for this species and manzanita (perennial shrub) was not observed during surveys.
8.	<i>Arctostaphylos refugioensis</i>	Refugio Manzanita	-/ G3/S3 1B.2	Dec-May	Sandstone outcrops, chaparral	<b>No Potential.</b> Sandstone and chaparral are not present in the Survey Area and species (perennial shrub) was not observed during surveys.
9.	<i>Arctostaphylos rudis</i>	Sand Mesa Manzanita	-/ G2/S2 1B.2	Nov-Feb	Chaparral. Sandy soils. <380 m.	<b>Low.</b> Suitable sandy soils are present, though manzanita shrubs were not detected in the Survey Area.
10.	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Miles' Milk-Vetch	-/ G5T2/S2 1B.2	Mar-Jun	Clay or serpentine soils in coastal scrub, grassy areas near coast. 0-90 m. Endemic to SLO County	<b>No Potential.</b> Suitable clay or serpentine soils are not present in the Survey Area.
11.	<i>Atriplex coulteri</i>	Coulter's Saltbush	-/ G3/S1S2 1B.2	Mar-Oct	Alkaline or clay soils, open sites, scrub, coastal bluff scrub	<b>No Potential.</b> Suitable coastal habitat (with alkaline or clay soil) is not present in the Survey Area.
12.	<i>Atriplex pacifica</i>	South Coast Saltscale	-/ G4/S2 1B.2	Mar-Oct	Coastal bluff scrub, dunes	<b>No Potential.</b> Coastal bluff or dune habitat is not present on the Property.
13.	<i>Atriplex serenana</i> var. <i>davidsonii</i>	Davidson's Saltscale	-/ G5T1/S1 1B.2	Apr-Oct	Coastal bluff scrub, coastal scrub. Alkaline soil. <200 m.	<b>No Potential.</b> Suitable habitat (alkaline soil) is not present in the Survey Area. Location considered outside of range for variety.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
14.	<i>Calochortus catalinae</i>	Catalina Mariposa Lily	-/ G3G4/S3S4 4.2	Feb-Jun	Heavy soil, open grassland or scrub	<b>No Potential.</b> Suitable heavy soils are not present in the Survey Area.
15.	<i>Calochortus fimbriatus</i>	Late-Flowered Mariposa Lily	-/ G3/S3 1B.3	Jun-Aug	Dry, open coastal woodland, chaparral	<b>No Potential.</b> Suitable habitat (ultramafic or serpentine slopes) is not present in the Survey Area and no known records within 10 miles.
16.	<i>Calystegia subacaulis</i> subsp. <i>episcopalis</i>	Cambria Morning-Glory	-/ G3T2?/S2? 4.2	Mar-Jul	Dry woodland, open scrub. Usually clay soil. <500 m.	<b>No Potential.</b> Suitable habitat (clay soil) is not present in the Survey Area. Nearest record (UC1541181; 1975) located 6.7 miles to the northeast.
17.	<i>Ceanothus cuneatus</i> var. <i>fascicularis</i>	Lompoc Ceanothus	-/ G5T4/S4 4.2	Feb-Apr	Chaparral on coastal sandy mesas; <400 m. s Cco.	<b>No Potential.</b> Suitable coastal habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.
18.	<i>Ceanothus impressus</i> var. <i>impressus</i>	Santa Barbara Ceanothus	-/ G3T2/S2 1B.2	Feb-Apr	Chaparral. Canyons, flats. Sandy substrates. <320 m.	<b>No Potential.</b> Suitable chaparral or canyon habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
19.	<i>Ceanothus impressus</i> <b>var. <i>nipomensis</i></b>	Nipomo Mesa Ceanothus	-/ G3T2/S2 1B.2	Feb-Apr	Chaparral. Canyons, flats. Sandy substrates. <200 m	<b>No Potential.</b> Suitable chaparral or canyon habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.
20.	<i>Cercocarpus betuloides</i> <b>var. <i>blancheae</i></b>	Island Mountain- Mahogany	-/ G5T4/S4 4.3	Feb-May	Chaparral	<b>No Potential.</b> Chaparral habitat is not present in the Survey Area.
21.	<i>Chorizanthe blakleyi</i>	Blakley's Spineflower	-/ G2/S2 1B.3	Apr-Jun	Chaparral, pinyon and juniper woodland; 600-1600 m. ScoRO	<b>No Potential.</b> Property is outside the known range for this species.
22.	<i>Chorizanthe rectispina</i>	Straight-Awned Spineflower	-/ G2/S2 1B.3	Apr-Jul	Chaparral, cismontane woodland, coastal scrub. In sand or disintegrating shale, often on granite. 200-600 m.	<b>No Potential.</b> Suitable habitat (granitic substrate in chaparral) is not present in the Survey Area. No known records within 9 miles.
23.	<i>Cirsium scariosum</i> <b>var. <i>loncholepis</i></b>	La Graciosa Thistle	FE/CT G5T1/S1 1B.1	May-Aug	Marshes, dune wetlands	<b>No Potential.</b> Suitable mesic/wetland habitat is not present in the Survey Area.
24.	<i>Cladium californicum</i>	California Sawgrass	-/ G4/S2 2B.2	Jun-Sep	Generally alkaline marshes, swamps	<b>No Potential.</b> Suitable mesic/wetland habitat is not present in the Survey Area.
25.	<i>Cordylanthus rigidus</i> <b>subsp. <i>littoralis</i></b>	Seaside Bird's-Beak	-/CE G5T2/S2 1B.1	Apr-Oct	Dunes	<b>Low.</b> Marginal habitat with sandy soils is present in the Survey Area , though most records are historic and/or over 5 miles from the Property.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
26.	<i>Deinandra increscens</i> subsp. <i>villosa</i>	Gaviota Tarplant	FE/CE G4G5T2/S2 1B.1	May-Oct	Coastal bluffs, fields	<b>No Potential.</b> Suitable coastal habitat is not present in the Survey Area.
27.	<i>Deinandra paniculata</i>	Paniculate Tarplant	-/- G4/S4 4.2	Mar-Dec	Grassland, open chaparral and woodland, disturbed areas, often in sandy soils	<b>High.</b> Sandy soils and appropriate habitat is present. This species is known to occur in the area and in disturbed habitat.
28.	<i>Delphinium parryi</i> subsp. <i>blochmaniae</i>	Dune Larkspur	-/- G4T2/S2 1B.2	Apr-Jun	Chaparral, coastal dunes (maritime). Rocky areas and dunes.	<b>No Potential.</b> Suitable dune or coastal habitat is not present in the Survey Area.
29.	<i>Delphinium umbraculorum</i>	Umbrella Larkspur	-/- G3/S3 1B.3	Apr-Jun	Moist oak forest, chaparral. Mesic sites.	<b>No Potential.</b> Suitable mesic or chaparral habitat is not present in the Survey Area.
30.	<i>Diplacus vandenbergensis</i>	Vandenberg Monkeyflower	FE/- G1/S1 1B.1	Apr-Jun	Open, fine sandy sites among shrubs.	<b>Moderate.</b> Suitable open areas in scrub habitat are present in the Survey Area.
31.	<i>Erigeron sanctarum</i>	Saints' Daisy	-/- G3/S3 4.2	Mar-Jul	Sandy sites, coastal scrub or woodland	<b>Low.</b> Suitable habitat with sandy soils is present, though known occurrences are over 6 miles west of the Property.
32.	<i>Eriodictyon capitatum</i>	Lompoc Yerba Santa	FE/CR G2/S2 1B.2	May-Sep	Ravines, mesas, chaparral, Bishop-pine woodland	<b>No Potential.</b> Suitable habitat is not present in the Survey Area and species (perennial shrub) was not observed during surveys.



	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
33.	<i>Eriogonum elegans</i>	Elegant Wild Buckwheat	-/ G4G5/S4S5 4.3	May-Nov	Uncommon. Sand or gravel	<b>No Potential.</b> Species is uncommon to the area with nearest occurrence from 1928 (historic) and over 8 miles from the Property.
34.	<i>Erysimum capitatum</i> <i>var. lompocense</i>	San Luis Obispo Wallflower	-/ G5T3/S3 4.2	Feb-May	Chaparral, coastal scrub. Sandy sites.	<b>No Potential.</b> No occurrences are within the 9-quad search or in Jepson Interchange and this rare taxon is no longer recognized as distinct from <i>E. capitatum</i> .
35.	<i>Fritillaria ojaiensis</i>	Ojai Fritillary	-/ G3/S3 1B.2	Feb-May	Rocky slopes, river basins. Sometimes on serpentine.	<b>No Potential.</b> Suitable rocky slope habitat is not present in the Survey Area and no known records within 10 miles.
36.	<i>Horkelia cuneata</i> <i>var. puberula</i>	Mesa Horkelia	-/ G4T1/S1 1B.1	Feb-Sep	Dry, sandy, coastal chaparral and oak woodland	<b>Moderate.</b> Suitable sandy soils and oak woodland are present and <i>Horkelia</i> sp. was documented in the Survey Area.
37.	<i>Horkelia cuneata</i> <i>var. sericea</i>	Kellogg's Horkelia	-/ G4T1?/S1? 1B.1	Apr-Sep	Old dunes, coastal sandhills. Sandy or gravelly soils.	<b>No Potential.</b> Suitable habitat is not present and nearest record (CNDDDB #43) is located 11.8 miles to the northeast.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
38.	<i>Layia heterotricha</i>	Pale-Yellow Layia	-/ G2/S2 1B.1	Mar-Jun	Alkaline or clay soils, open areas, in pinyon-juniper woodland, grassland; 270-1705 m. Teh, San Joaquin Valley, SCoR, n WTR	<b>No Potential.</b> Suitable soils are not present and the disturbed quality of the Survey Area is not suitable and nearest occurrence is over 7 miles west of the Property (CNDDDB #53).
39.	<i>Lepidium virginicum</i> <b>var. robinsonii</b>	Robinson's Pepper-Grass	-/ G5T3/S3 4.3	Jan-Jul	Dry, disturbed areas, bottomland, riverbanks, meadows, fields, pastures, cliffs, scrub.	<b>No Potential.</b> This species usually occurs in wetland habitat and nearest occurrence is over 6 miles west (CNDDDB #159) of the Property. This rare taxon is no longer recognized as distinct from <i>L. virginicum</i> .
40.	<i>Lonicera subspicata</i> <b>var. subspicata</b>	Santa Barbara Honeysuckle	-/ G5T2?/S2? 1B.2	May-Aug	Chaparral, Cismontane woodland, Coastal scrub	<b>No Potential.</b> No suitable habitat within the Survey Area and species (perennial shrub) was not observed during surveys. Property is outside known range for this species.
41.	<i>Mimulus</i> <i>subsecundus</i>	One-Sided Monkeyflower	-/ G3G4Q/S3S4 4.3	May-Jul	Chaparral, Lower montane coniferous forest	<b>No Potential.</b> Suitable chaparral or forest habitat is not present in the Survey Area.
42.	<i>Monardella</i> <i>hypoleuca</i> subsp. <i>hypoleuca</i>	White-Veined Monardella	-/ G4T3/S3 1B.3	Apr-Sep	Chaparral and cismontane woodland; 50-1525 m.	<b>No Potential.</b> Suitable habitat is not present in the Survey Area and nearest occurrence is over 8 miles south.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
43.	<i>Monardella sinuata</i> <b>subsp. sinuata</b>	Southern Curly- Leaved Monardella	-/ G3T2/S2 1B.2	Apr-Sep	Sandy soils, coastal strand, dune and sagebrush scrub, coastal chaparral and oak woodland	<b>Low.</b> Marginally suitable habitat (sandy soil) is present in the Survey Area.
44.	<i>Monardella undulata</i> <b>subsp. undulata</b>	San Luis Obispo Monardella	-/ G2/S2 1B.2	May-Sep	Stabilized dunes, coastal scrub, stabilized sandy soils	<b>No Potential.</b> Property is outside the typical species range.
45.	<i>Mucronea</i> <b>californica</b>	California Spineflower	-/ G3/S3 4.2	Mar-Aug	Chaparral, cismontane woodland, coastal dunes, coastal scrub, valley and foothill grassland. Sandy soils.	<b>Moderate.</b> Suitable coastal scrub and agricultural habitats with sandy soils are present on the Property.
46.	<i>Nasturtium gambelii</i>	Gambel's Water Cress	FE/CT G1/S1 1B.1	Apr-Oct	Marshes, streambanks, lake margins	<b>No Potential.</b> Suitable mesic habitat is not present in the Survey Area.
47.	<i>Ophioglossum</i> <b>californicum</b>	California Adder's- Tongue	-/ G4/S4 4.2	Dec-Jun	Mesic habitats; grassy pastures, chaparral, vernal pool margins. 60-450 m. n&c SNF, GV, CCo, SCo, sw PR.	<b>No Potential.</b> Suitable mesic habitat is not present in the Survey Area.
48.	<i>Phacelia hubbyi</i>	Hubby's Phacelia	-/ G4/S4 4.2	Apr-Jul	Generally open gravelly or rocky slopes, chaparral, grassland	<b>No Potential.</b> Suitable habitat (rocky slopes) is not present in the Survey Area and no records known within 10 miles.
49.	<i>Prunus fasciculata</i> <b>var. punctata</b>	Sand Almond	-/ G5T4/S4 4.3	Mar-Apr	Sandy soils, scrubland, oak woodland	<b>Moderate.</b> Sandy soils and oak woodland habitat are present. Species known to occur within 6 miles of the Property.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
50.	<i>Sanicula hoffmannii</i>	Hoffmann's Sanicle	-/- G3/S3 4.3	Mar-May	Shrubby coastal hills, pine woodland	<b>No Potential.</b> Suitable habitat is not present in the Study Area.
51.	<i>Scrophularia atrata</i>	Black-Flowered Figwort	-/- G2?/S2? 1B.2	Mar-Jul	Around swales and in sand dunes. Sand, diatomaceous shales, calcium-, diatom-rich soils	<b>Low.</b> Suitable scrub habitat is present in the Survey Area, though sandy soils are not optimal to support this species.
52.	<i>Senecio aphanactis</i>	Chaparral Ragwort	-/- G3/S2 2B.2	Jan-May	Alkaline flats, dry open rocky areas	<b>No Potential.</b> Suitable habitat and alkaline soils are not present in the Survey Area and no records known within 10 miles.
53.	<i>Symphotrichum defoliatum</i>	San Bernardino Aster	-/- G2/S2 1B.2	Jul-Dec	Grassland, disturbed places	<b>No Potential.</b> Suitable grassland habitat is not present and Property is outside typical species range.

**State/Rank Abbreviations:**

FE: Federally Endangered  
FT: Federally Threatened  
PE: Proposed Federally Endangered

PT: Proposed Federally Threatened  
CE: California Endangered  
CR: California Rare

CT: California Threatened  
CCE: Candidate for California Endangered  
CCT: Candidate for California Threatened

**California Rare Plant Ranks:**

CRPR 1A: Plants presumed extirpated in California and either rare or extinct elsewhere  
CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere  
CRPR 2A: Plants presumed extirpated in California, but common elsewhere  
CRPR 2B: Plants rare, threatened, or endangered in California, but more common elsewhere  
CRPR 4: Plants of limited distribution - a watch list

**CRPR Threat Ranks:**

0.1 - Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)  
0.2 - Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)  
0.3 - Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

**Global/State Ranks**

G1/S1 – Critically Imperiled	Q – Element is very rare but there are taxonomic questions associated with it.
G2/S2 – Imperiled	
G3/S3 – Vulnerable	Range rank – (e.g., S2S3 means rank is somewhere between S2 and S3)
G4/S4 – Apparently Secure	? – (e.g., S2? Means rank is more certain than S2S3 but less certain than S2)
G5/S5 – Secure	

**APPENDIX D. SPECIAL STATUS ANIMALS REPORTED FROM THE REGION**

Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
1. <i>Agelaius tricolor</i>	Tricolored Blackbird	-/CT G2G3/S1S2 SSC	Requires open water, protected nesting substrate, & foraging area with insect prey near nesting colony.	<b>No Potential.</b> Open water is not present in the Survey Area.
2. <i>Aimophila ruficeps canescens</i>	Southern California Rufous-Crowned Sparrow	-/ G5T3/S3 WL	Resident in Southern California coastal sage scrub and mixed chaparral.	<b>Present.</b> One adult was observed singing from a perch near the stock pond during April 2019 survey (Storrer 2019).
3. <i>Ambystoma californiense</i>	California Tiger Salamander	FT/CT G2G3/S2S3 WL	Need underground refuges, ground squirrel burrows & vernal pools or other seasonal water for breeding.	<b>High.</b> Known CTS Breeding Pond LOAL-40 near the Property was confirmed to have larval CTS during April 2019 aquatic survey (Storrer 2019).
4. <i>Anaxyrus californicus</i>	Arroyo Toad	FE/ G2G3/S2S3 SSC	Rivers with sandy banks, willows, cottonwoods, and sycamores. Prefers loose gravelly soils in drier portions of their range.	<b>No Potential.</b> Suitable aquatic and riparian habitat is not present in the Survey Area.
5. <i>Anniella pulchra</i>	Northern California Legless Lizard	-/ G3/S3 SSC	Sandy or loose loamy soils under coastal scrub or oak trees. Soil moisture essential.	<b>High.</b> Suitable habitat and sandy soils are present in the Survey Area. Unlikely to occur in the disturbed habitat of the Project area.
6. <i>Antrozous pallidus</i>	Pallid Bat	-/ G5/S3 SSC	Rock crevices, caves, tree hollows, mines, old buildings, and bridges.	<b>No Potential.</b> Suitable roosting habitat is not present in the Survey Area.
7. <i>Bombus caliginosus</i>	Obscure Bumble Bee	-/ G4?/S1S2 SA	Open coastal grasslands and meadows. Food plant genera include Baccharis, Cirsium, Lupinus, Lotus, Grindelia and Phacelia.	<b>No Potential.</b> Coastal grasslands or meadows are not present in the Survey Area.
8. <i>Buteo regalis</i>	Ferruginous Hawk	-/ G4/S3S4 WL	Winters locally in open grassland or savannah habitats. More common in interior SLO County than coast.	<b>No Potential.</b> Suitable open grassland habitat is not present.

Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
9. <i>Corynorhinus townsendii</i>	Townsend's Big-Eared Bat	-/ G3G4/S2 SSC	Roosts in caves, abandoned buildings, tunnels. Roosting sites limiting. Sensitive to human disturbance.	<b>No Potential.</b> Suitable roosting habitat is not present in the Survey Area.
10. <i>Danaus plexippus pop. 1</i>	Monarch - California Overwintering Population	-/ G4T2T3/S2S3 SA	Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	<b>No Potential.</b> Suitable roosting grove habitat is not present in the Survey Area.
11. <i>Empidonax traillii extimus</i>	Southwestern Willow Flycatcher	FE/CE G5T2/S1 SA	Riparian woodlands in Southern California.	<b>No Potential.</b> No occurrences known in the vicinity and dry, ephemeral drainage is not suitable for nesting or breeding for this species.
12. <i>Emys marmorata</i>	Western Pond Turtle	-/ G3G4/S3 SSC	Permanent or semi-permanent streams, ponds, lakes.	<b>No Potential.</b> Aquatic habitat is not present in the Survey Area.
13. <i>Eremophila alpestris actia</i>	California Horned Lark	-/ G5T4Q/S4 WL	Nests on the ground in open habitats. More common in the interior.	<b>No Potential.</b> This species prefers flat open areas for nesting and no suitable breeding habitat is present in the Survey Area.
14. <i>Eucyclogobius newberryi</i>	Tidewater Goby	FE/ G3/S3 SSC	Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	<b>No Potential.</b> Aquatic habitat is not present in the Survey Area.
15. <i>Falco mexicanus</i>	Prairie Falcon	-/ G5/S4 WL	Inhabits dry, open terrain. Nests on cliffs near open areas for hunting.	<b>No Potential</b> (nesting). Suitable nesting habitat is not present in the Survey Area. <b>Low</b> (foraging). Nearest occurrence is 4.8 miles southeast of the Property. Prairie falcon could utilize the site for forage, but unlikely.
16. <i>Falco peregrinus anatum</i>	American Peregrine Falcon	FD/CD G4T4/S3S4 FP	Nests on cliffs, banks, dunes, mounds, and human-made structures, especially near water.	<b>No Potential</b> (nesting). Nesting habitat is not present on the Property. <b>Low</b> (foraging). Known to roost west of the Property (CNDDDB #57) and could utilize the site for forage.

Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
17. <i>Gasterosteus aculeatus williamsoni</i>	Unarmored Threespine Stickleback	FE/CE G5T1/S1 FP	Weedy pools, backwaters, and among emergent vegetation at the stream edge, in small S. Calif. streams. Requires cool, clear water.	<b>No Potential.</b> Aquatic habitat is not present in the Survey Area.
18. <i>Lasionycteris noctivagans</i>	Silver-Haired Bat	-/ G5/S3S4 SA	Coastal and montane forests, often feeds over water. Roosts in hollow trees, loose bark, woodpecker cavities, rarely in rocks.	<b>No Potential.</b> Suitable roosting habitat is not present in the Project Area.
19. <i>Lasiurus blossevillii</i>	Western Red Bat	-/ G5/S3 SSC	Roosts primarily in trees, from sea level up through mixed conifer forests.	<b>No Potential.</b> Suitable roosting habitat is not present in the Project Area.
20. <i>Lasiurus cinereus</i>	Hoary Bat	-/ G5/S4 SA	Forages in open habitats or habitat mosaics with trees. Roosts in dense foliage of medium to large trees. Feeds on moths. Requires water.	<b>No Potential.</b> Suitable aquatic sources for foraging are not present in the Survey Area.
21. <i>Myotis yumanensis</i>	Yuma Myotis	-/ G5/S4 SA	Caves, mines, buildings, tree cavities, rock crevices, or under bridges. Feeds near open water.	<b>No Potential.</b> Suitable canyon or open water sources are not present in the Survey Area.
22. <i>Neotoma lepida intermedia</i>	San Diego Desert Woodrat	-/ G5T3T4/S3S4 SSC	Moderate to dense canopies preferred. Abundant in rocky areas, outcrops. Ranges from San Diego to SLO Counties.	<b>No Potential.</b> Suitable dense canopy woodland or rocky outcrop habitat is not present in the Survey Area.
23. <i>Oncorhynchus mykiss irideus pop. 10</i>	Steelhead - Southern California Dps	FE/- G5T1Q/S1 SA	Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.	<b>No Potential.</b> Suitable aquatic habitat is not present in the Survey Area.
24. <i>Phrynosoma blainvillii</i>	Coast Horned Lizard	-/ G3G4/S3S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	<b>No Potential.</b> Suitable wash and or chaparral habitat is not present in the Survey Area. Nearest occurrence is over 7.5 miles northwest of the Property (CNDDB #581).
25. <i>Progne subis</i>	Purple Martin	-/ G5/S3 SSC	In San Luis Obispo County prefers nesting in Sycamore trees along riparian corridors.	<b>No Potential.</b> Suitable riparian corridor habitat is not present in the Survey Area and outside known range for this species.



Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
26. <i>Rana boylei</i>	Foothill Yellow-Legged Frog	-/CCT G3/S3 SSC	Partly shaded, shallow streams and riffles with rocky substrate. Min. 15 weeks for larval development.	<b>No Potential.</b> Suitable habitat is not present in the Survey Area and nearest occurrence is historic (CNDDDB #2419) in 1940 and over 11 miles southeast.
27. <i>Rana draytonii</i>	California Red-Legged Frog	FT/- G2G3/S2S3 SSC	Lowlands and foothills in or near sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks for larval development.	<b>Moderate.</b> CRLF have potential to use CTS pond LOAL-40. Nearest occurrence is 1.4 miles south of the Survey Area (CNDDDB #1029). Not likely to be found in Project area.
28. <i>Salvadora hexalepis virgultea</i>	Coast Patch-Nosed Snake	-/ G5T4/S2S3 SSC	Require small mammal burrows for refuge and overwintering sites.	<b>Low.</b> Suitable scrub habitat is present though not likely to occur in the Survey Area based on regional scarcity.
29. <i>Setophaga petechia</i>	Yellow Warbler	-/ G5/S3S4 SSC	Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	<b>No Potential</b> (nesting). Suitable riparian nesting habitat is not present in the Survey Area. <b>Low.</b> Could be found foraging in ephemeral drainage habitat but not likely to occur in the Project area.
30. <i>Spea hammondi</i>	Western Spadefoot	-/ G3/S3 SSC	Grassland and woodland habitats with vernal pools for breeding. Most of year spent underground.	<b>Moderate.</b> Spadefoot toads have potential to use CTS pond LOAL-40. Nearest occurrence is 1.4 miles south of the Survey Area (CNDDDB #46). Not likely to be found in Project area.
31. <i>Strix occidentalis occidentalis</i>	California Spotted Owl	-/ G3G4T2T3/S3 SSC	Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	<b>No Potential.</b> Suitable canyon habitat is not present in the Survey Area.
32. <i>Taxidea taxus</i>	American Badger	-/ G5/S3 SSC	Needs friable soils in open ground with abundant food source such as California ground squirrels.	<b>Moderate.</b> Suitable foraging and denning habitat is present in the Survey Area and nearest occurrences is 1 mile southwest (CNDDDB #100).

Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preference	Potential to Occur
33. <i>Thamnophis hammondi</i>	Two-Striped Gartersnake	-/ G4/S3S4 SSC	Coastal California from Salinas to Baja, sea level to 7000â€™™, aquatic, in or near permanent water, streams with rocky beds and riparian growth	<b>No Potential.</b> Suitable aquatic or riparian habitat is not present in the Survey Area.
34. <i>Trimerotropis occulens</i>	Lompoc Grasshopper	-/ G1G2/S1S2 SA	Gravelly/rocky substrates and road cuts. Known only from Santa Barbara and San Luis Obispo Counties.	<b>No Potential.</b> Suitable rocky substrates are not present in the Survey Area.
35. <i>Vireo bellii pusillus</i>	Least Bell's Vireo	FE/CE G5T2/S2 SA	Riparian habitat, near water or dry streambed, <2000 ft. Nests in willows, mesquite, Baccharis.	<b>No Potential.</b> Suitable riparian habitat is not present in the Survey Area.

**Federal and State Status Abbreviations:**

FE: Federally Endangered	CE: California Endangered
FT: Federally Threatened	CT: California Threatened
PE: Proposed Federally Endangered	CCE: Candidate for California Endangered
PT: Proposed Federally Threatened	CCT: Candidate for California Threatened

**Global/State Ranks:**

G1/S1 – Critically Imperiled	Q – Element is very rare but there are taxonomic questions associated with it.
G2/S2 – Imperiled	
G3/S3 – Vulnerable	Range rank – (e.g., S2S3 means rank is somewhere between S2 and S3)
G4/S4 – Apparently Secure	
G5/S5 – Secure	? – (e.g., S2? Means rank is more certain than S2S3 but less certain than S2)

**California Department of Fish and Wildlife Rank:**

WL:	Watch Lis
SSC:	Species of Special Concern
FP:	Fully Protected
SA:	Special Animal

**APPENDIX E. COUNTY COMMENTS AND ACTIONS ADDRESSED**

County Comment(s)	County Action(s) Request	Action Addressed (Section/ page #)
<i>Background Review</i>		
<p><b>Comment 4.1.</b> The report appears to rely solely on CDFW’s California Natural Diversity Database (CNDDDB) for determining potentially occurring special-status species. Other sources include important information on potentially occurring wildlife species. For example, Thomson et al., <i>California and Reptile Species of Special Concern</i> (2016), includes specimen locations for some reptile and amphibian species that are not included in the California Natural Diversity Database.</p>	<p><b>Action 4.1.</b> Clarify what additional sources were consulted, and for what purposes, to ensure that all potentially occurring special-status wildlife species were considered.</p>	Section 2
<p><b>Comment 4.2.</b> The methods section states that May 28, 2020, was timed at an appropriate season to detect all potentially occurring special-status plant species. As Table 3 includes Santa Ynez groundstar (<i>Ancistrocarphus keilli</i>), an annual herb that blooms from March to April, this species would have a low likelihood of being detected in late May (but would likely have been detectable during the April 9, 2019, survey).</p>	<p><b>Action 4.2.</b> Clarify in the text that botanical surveys were conducted on two dates within the survey area, as described in Table 1, which combined should have been sufficient to detect potentially occurring special-status species.</p>	Section 2.1 Section 4.2.2
<i>Results</i>		
<p><b>Comment 5.1.</b> The scientific or common name of several bird species is not up to date with current nomenclature. The scientific name of one species is not included, such as common raven,” not “raven” House finch is “<i>Haemorhous mexicanus</i>” not <i>Carpodacus mexicanus</i> Yellow-rumped warbler is “<i>Setophaga petechis</i>” not <i>Dendroica petechia</i>. More importantly, the status of one special-status species, Southern California rufous-crowned sparrow (<i>Aimophila ruficeps canescens</i>), which is a Watch List species, is given incorrectly.</p>	<p><b>Action 5.1.</b> Ensure that the cited statuses of special-status species are correct.</p>	Section 3.2
<p><b>Comment 5.2.</b> The report states that seaside bird’s beak (<i>Cordilanthus rigidus</i> ssp. <i>littoralis</i>) and curly-leaved monardella (southern curly-leaved monardella, <i>Monardella sinuata</i> ssp. <i>sinuata</i>) were eliminated from consideration because of their association with coastal habitats. However, according to the CNPS’s Inventory of Rare Plants (<a href="http://www.rareplants.cnps.org">http://www.rareplants.cnps.org</a>), both species are known to occur in cismontane woodland, chaparral, and coastal scrub. Seaside bird’s beak occurs at</p>	<p><b>Action 5.2.</b> Please add seaside bird’s beak and southern curly-leaved monardella to Table 3 and address their potential to occur on the project site, including whether the surveys conducted would have detected them.</p>	Section 3.1.1 Table 2

County Comment(s)	County Action(s) Request	Action Addressed (Section/ page #)
<p>elevations up to nearly 1,700 feet above mean sea level (amsl), and southern curly-leaved monardella occurs at elevations up of nearly 1,000 feet amsl (the project site is less than 900 feet amsl). CNDDDB includes several inland occurrences in the Purisima Hills approximately 5.0 miles west of the project site for both species and includes a single occurrence of seaside bird's beak along SR-246, less than 2.0 miles south of the site. Although suitable habitat for these species that is subject to impacts from the project may be minimal or absent on the site, these species should not be removed from consideration in Table 3.</p>		
<p><b>Comment 5.3.</b> Reference to “ESH” in relation to Coast Live Oak Woodland would appear to suggest a level of sensitivity that may require habitat setbacks that could be more than the 6-foot avoidance required for individual trees. However, “ESH” under the Conservation Element (County 2018) typically refers only to habitat specifically mapped as such in County planning documents. Some community plans may also include specific ESH provisions for the plan area covered. But no such requirements appear to exist for the project vicinity, and the term “ESH” does not appear in the County Cannabis Land Use Ordinance.</p>	<p><b>Action 5.3.</b> Clarify the significance of the term “ESH” and the requirements entailed for Coast Live Oak Woodland, including whether any setbacks are required.</p>	<p>TPP-1 in Section 4.1.1</p>
<i>Impact Discussion</i>		
<p><b>Comment 6.1.</b> Table 3 confirms that impacts are only in the land covers mentioned, but the extent of Coast Live Oak Woodland/Tree mapped in Figures 4 and 5 suggests that the footprint of hoop houses may overlap this area, although this is difficult to tell for certain because neither figure includes project impacts. The site plans in Figures 2a and 2b appear to show impacts from hoop houses sufficiently avoid the oak tree canopy and Coast Live Oak Woodland, but the boundaries for oaks and oak woodland do not appear to be the same as those shown in Figures 4 and 5.</p>	<p><b>Action 6.1.</b> Include impacts on Figure 5 or on a new figure on which they are displayed in relation to the sensitive biological resources shown on Figure 5. Ensure biological resources are shown consistently, and in a way that accurately portrays project impacts.</p>	<p>Appendix B, Figure 4</p>
<p><b>Comment 6.2.</b> Given the measure in Section 7.1 requiring that no grading, tilling, or stockpiling of equipment or supplies may occur within 6 feet of the dripline of native trees, this impact should be less than significant. However, see <b>Comment 6.1</b> and <b>Action 6.1</b>, above.</p>		<p>Appendix B, Figure 4 and Section 4.1.1</p>

County Comment(s)	County Action(s) Request	Action Addressed (Section/ page #)
<p><b>Comment 6.3.</b> Given the negative survey results, the statement that no impacts would occur to special-status plants is presumably correct. But see <b>Comment 5.3</b> and <b>Action 5.3</b>.</p>	<p><b>Action 6.3.</b> Action is required on this comment only if the incorporation of <b>Action 5.3</b> determines that potential impacts would occur.</p>	<p>Section 4.2.2</p>
<p><b>Comment 6.4.</b> Although this section concludes this impact would be less than significant, a nesting bird measure is included in Section 7 for additional fence installation. But fence installation is not mentioned in the discussion in Section 6.6, and this would seem to be an activity that could potentially result in a violation of the California Fish and Game Code nesting bird protections, and similar provisions of the Migratory Bird Treaty Act.</p>	<p><b>Action 6.4.</b> Revise the analysis to include impacts from fence installation, and consider these impacts significant absent mitigation, if take of nesting birds could result.</p>	<p>Section 4.2.3</p>
<p><b>Comment 6.5.</b> Although the argument that the project would not result in significant impacts to wildlife movement is convincing, details of the winter-time removal of plastic hoop house coverings are not provided. County-supplied information suggests the coverings will be absent only from November to February. This may be important, for example, with regard to the dispersal of juvenile California tiger salamanders as they leave breeding habitats after metamorphosis in spring.</p>	<p><b>Action 6.5.</b> Clarify when the plastic hoop house coverings will be absent, and the importance of the timing in relation to movement of listed amphibians.</p>	<p>Section 1.3, 0 in Section 0</p>