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County of Santa Barbara
Attn: Stephen Peterson
Planning and Development
123 East Anapamu Street
Santa Barbara, CA 93101

May 7, 2020

RE: Castlerock Family Farms II (Case No. 19LUP-00000-00050, 19APL-00000-00023) - Revised Revegetation, Habitat and Tree Protection, and Wildlife Movement Plan

Dear Stephen,

Enclosed is a revised revegetation, habitat and tree protection, and wildlife movement plan for the Castlerock Family Farms II commercial cannabis cultivation project (Case No. 19LUP-00000-00050, 19APL-00000-00023) located at 2200 W. Highway 246 (APN: 099-230-034) near the town of Buellton. This plan was revised on February 17, 2020 per Santa Barbara County Planning and Development Department's request to include installation of 829 container-grown plants (trees, shrubs, and perennial grasses) in the 3.28-acre habitat restoration/revegetation area to screen the project from public view from the south. This plan was further revised on May 7, 2020 to include tiger salamander impact avoidance and minimization measures specified in the USFWS General Conservation Plan for Cultivation Activities[1] and processing of a 10(a)(1)B permit from the USFWS.

Revegetation Plan

Revegetation of a previously farmed 3.28-acre area adjacent to the Santa Ynez River (see attached figure) will be performed to satisfy State Water Resources Control Board (SWRCB) Cannabis Cultivation Policies No. 33 and 35, which require revegetation of disturbed land within SWRCB-mandated riparian setback areas. Revegetation will also provide screening of the 16.53-acre cannabis cultivation area in the southeastern portion of the property as required by the County's Cannabis Land Use Ordinance and Licensing Program (Section 35.42.075).

The **goal** of this revegetation effort is:

To establish native vegetation that provides wildlife habitat and screens the project from public view south of the project site.

[1] **USFWS 2019**. General Conservation Plan for Cultivation Activities in Santa Barbara County. Ventura, California. Available online at: https://www.fws.gov/ventura/docs/CultivationGCP/SignedSBCGeneralConservationPlanforCultivationActivities.pdf

Revegetation **objectives** are to:

- Establish 85 percent absolute native vegetation cover within 5 years.
- Provide screening that is at least 10 ft. tall (on average) with at least 90 percent horizontal coverage (as viewed from the south) and at least 6 ft. tall after 5 years.
- Stabilize the soils and prevent soil erosion for the life of the project.

As part of this revegetation effort, the existing unimproved dirt access road in the restoration area will be abandoned. Chainlink fencing will be installed to prevent vehicle encroachment into the revegetation area. Revegetation will be accomplished by planting 131 native trees, 445 native shrubs, and 253 native perennial grass plants (Table 1) that naturally occur in upland habitat in the Santa Ynez Valley adjacent to the Santa Ynez River.

The plant materials will be contract grown by Manzanita Nursery in Solvang and will be planted in March-April 2020. The quantity installed may vary slightly depending on availability. All plant materials, with the exception of the Ceanothus Ray Hartman, will be grown from local cuttings and/or seed collected in the Santa Ynez Valley. Prior to plant installation, the entire 3.28-acre revegetation area shall be tilled to remove existing non-native vegetation and prepare the soil for planting.

The project biologist (Mark de la Garza) will pin-flag the tree planting locations at the 30-ft. spacing (mature plant width) listed on the planting palette table. Shrubs and grasses will be arranged in groups of 3-6 between the trees in a natural pattern. Each container-grown plant will be hand-planted in a hole at least 2 times the diameter of and 6 in. deeper than the container they came in. One-quarter cup of a slow-release fertilizer such as Marilyn's Tri-C Organic Fertilizer (6N-2P-4K) or other similar-strength slow-release fertilizer shall be placed in the bottom of each planting hole. All plastic containers will be returned to the nursery to be reused or recycled.

After the plant materials have been installed, a temporary drip irrigation system will be installed. All shrubs, herbs, grasses, and vines shall have a 1-2-gal./hour emitter. All trees shall have adjustable emitters that can supply between 1-5 gal./hour. The drip irrigation system will be controlled by battery or solar-powered timer(s) or control valve(s) to control the duration and frequency of water supply.

After the drip irrigation system has been installed, a 3-4-in.-thick layer of organic mulch (woodchips or screened green waste) will be placed on the soil surface to cover the temporary drip irrigation lines, suppress weed growth, increase the soil's water-holding capacity, and reduce erosion potential.

The following planting specifications for all plant materials will be followed:

1) Dig planting holes at least 6 in. deeper and twice the diameter of the container.
2) Pre-soak planting hole.
3) Place ¼ cup of Marilyn's Tri-C organic Fertilizer® (6N-2P-4K) in bottom of the planting hole.
4) Backfill bottom 6 in. of planting hole and mix the fertilizer into the soil.
5) Place plant in hole, making sure soil around base is at the same height or slightly higher than the surrounding earth.
6) Firmly pack soil around new plant.
7) Water the newly installed plants.
8) Spread a 3-4-in.-thick layer of organic mulch over the entire 3.28-acre revegetation site.

Table 1. Planting Palette for 3.28-Acre Revegetation Area

Common Name	Scientific Name	Habit	Mature Plant Size			Design Percent Cover	Container Size (gal.)	Qty.
			Height (ft.)	Width (ft.)	Area (sq. ft.)			
California box elder	*Acer negundo*	deciduous tree	30	30	707	6	15	12
California box elder	*Acer negundo*	deciduous tree	30	30	707	9	5	18
Coast live oak	*Quercus agrifolia*	evergreen tree	40	30	707	50	15	101
Coyote brush	*Baccharis pilularis* subsp. *consanguinea*	evergreen shrub	10	10	79	10	1	182
Giant wild rye	*Elymus condensatus*	evergreen grass	10	6	28	5	1	253
Ceanothus Ray Hartman	*Ceanothus arboreus x griseus*	evergreen shrub	18	10	79	5	1	91
Sugar bush	*Rhus ovata*	evergreen shrub	15	15	177	10	1	81
Toyon	*Heteromeles arbutifolia*	evergreen shrub	25	10	79	5	1	91
Total								**829**

Successful establishment of native vegetation depends on routine maintenance to remove non-native broad-leaved weeds and keep the drip irrigation system in working order. Weeding must occur at least monthly to remove black mustard, Italian thistle, wild radish, tree tobacco, Russian tumbleweed, smilo grass, and other non-native invasive plants until the success criteria are met. The drip irrigation system shall be checked monthly to ensure emitters are not clogged and the controller is functioning properly.

All newly installed plantings will be watered 2 times a week for approximately 1 hour for the first 3 months. For the remaining 9 months, watering frequency shall be decreased to once a week or until seasonal rainfall provides sufficient moisture. The second year after planting, watering shall occur at least once a week and may be decreased or increased as needed depending on rainfall and soil moisture. Watering shall be gradually decreased the third year after planting to once every 2 weeks in April through August.

The plants should be well established by the end of the third year and may not need to be watered unless there is severe drought. All of the installed plants are drought adapted and capable of surviving a prolonged drought by losing their leaves and dying back (decreasing the number of live branches). However, this could mean the desired level of screening will not be met. Therefore, the plants shall be watered as needed for the life of the project to prevent the screening from becoming too thin. The applicant may adjust watering frequency as needed.

Performance Criteria and Success Criteria

Performance standards are interim thresholds that must be met while the project is being implemented. If a performance standard threshold is not met, remedial action(s) must be taken. Monitoring and determination of success shall be performed by a County-approved biologist. Success criteria are physical properties that can be measured and observed over time, and are used to determine when a project has successfully met its goals and objectives. For this project, a combination of quantitative and qualitative measures shall be used to evaluate project progress toward attainment of the riparian habitat restoration/mitigation goals and objectives.

Performance Standards

The following absolute native vegetation cover and tree height criteria (measured in the spring and averaged) will be used to assess performance during the 5-year maintenance period. Tree and shrub survival is 85 percent for all years.

Year 1: 20 percent cover, minimum 3 ft. tree height

Year 2: 40 percent cover, minimum 5 ft. tree height

Year 3: 60 percent cover, minimum 7 ft. tree height

Year 4: 70 percent cover, minimum 9 ft. tree height

Year 5: 85 percent cover, minimum 10 ft. tree height

In addition to these native vegetation performance standards, non-native vegetation cover (excluding non-native annual grasses) shall not exceed 15 percent (averaged across all sampling locations) at any time.

Success Criteria

The following success criteria must be achieved 5 years or sooner after plant installation:

- **Absolute native vegetation cover shall be at least 85 percent (averaged across all sampling locations).**
- **Native trees shall have a minimum 85 percent survival and 85 percent shall be at least 10 ft. tall with an intact healthy primary growth leader and intact trunk cambium. Should tree mortality exceed 15 percent, replacement trees will be installed and monitored for 5 years from the date of installation.**
- **Vegetation shall provide at least 90 percent horizontal coverage as viewed from the south, i.e., be at least 6 ft. tall on average.**

The monitoring biologist shall conduct quarterly site visits during the first 2 years after planting and visit the site at least twice a year in the spring and fall for 3-5 years after planting. With approval of the County and SWRCB, these visits may be reduced if the success criteria and performance standards are met. Site visits will be used to verify that monthly maintenance activities are occurring per the plan and to identify any problems that need to be corrected.

The monitoring biologist shall perform annual vegetation sampling using standard transect-quadrat methods in March-April for 5 years. He or she shall sample at regularly spaced intervals along a transect and shall use a random number generator to determine the direction perpendicular to the transect and the distance from the transect to the sampling location.

A circular 100-sq.-ft. sampling area (quadrat) shall be sampled at each location. Data collected from each quadrat shall include: vegetation species, absolute vegetation cover, bare ground or mulch cover, native grass/herb species cover, native shrub species cover, broadleaf non-native weed cover, and non-native grass cover. Vegetation sample replication shall be sufficient to provide a 90 percent confidence interval less than or equal to 15 percent of the mean. The monitoring biologist shall visually estimate the absolute (total) vegetation cover and the percentage of unvegetated area within each quadrat sample site. Visual estimates of absolute cover shall be based on a 1999 Bureau of Land Management *Sampling Vegetation Attributes* (http://www.blm.gov/nstc/library/pdf/samplveg.pdf) Frequency Method.

The monitoring biologist will attach aluminum identification tags with a unique identification number to all trees and large shrubs. The health and height of each tree and shrub shall be recorded and measured once a year in the spring when vegetation sampling is performed during the 5-year maintenance/monitoring period. Problems with encroachment, weed growth, erosion control, herbivory, or other issues shall be noted, along with recommendations to correct problems. The monitoring biologist shall also record any wildlife observed within the habitat restoration areas and include a list of wildlife species observed, any nesting or breeding activity, and any use of the site as a wildlife corridor.

The annual monitoring and vegetation sampling results shall be reported by June 15 and submitted with photographs to the applicant, the County of Santa Barbara, and the SWRCB. Spring vegetation sampling shall be performed during the peak growing season (March 1 to April 31). The annual status report shall be prepared by a County-approved biologist and shall summarize the site preparation and plant installation activities performed, as well as report the spring vegetation sampling results. The report shall also include: times and dates of all monitoring field visits, results of sampling, field data, a figure showing the location of vegetation sampling transects, and a discussion of remedial activities and maintenance recommendations.

Tree Protection Plan

For any land use entitlement for a commercial cannabis activity that would involve pruning, damage, or removal of a native tree, the County Cannabis Land Use Ordinance and Licensing Program requires the applicant to prepare and submit a tree protection plan. However, the Castlerock Family Farms II commercial cannabis project will not require any native tree pruning, damage, or removal.

The April 10, 2019 biological assessment report that Watershed Environmental, Inc. prepared for this project identified revegetation of previously disturbed areas within the SWRCB-mandated watercourse setback as the project activity for which a tree protection plan is needed. This recommendation was based solely on the proximity of the revegetation area to native riparian trees growing on the banks and in the bed of the Santa Ynez River.

Revegetation will occur in a 3.28-acre upland area that was previously farmed. The process will not require pruning or removal of any native trees. The only time equipment will be allowed to operate in the revegetation area is during site preparation, when the area will be disked, and during the installation phase, when the site will be drill seeded and straw mulched. This activity will occur over the course of a few days and will not require pruning or removal of any native trees. A County-approved biologist will be present during the site preparation and installation revegetation phases to ensure that nearby native trees remain undamaged by the small farm tractor pulling a disk, harrow, and seeder.

There are no native trees near the cannabis cultivation, processing, and storage areas. The proposed security fencing will effectively prevent any accidental damage to native trees from equipment used in cannabis cultivation operations outside the cultivation areas (refer to attached figure).

Habitat Protection Plan

The County Cannabis Land Use Ordinance and Licensing Program requires an applicant for land use entitlement for a commercial cannabis activity to prepare a habitat protection plan for any cannabis-related activity that would involve clearing native or other sensitive vegetation where there is medium or high potential for occupation by a special-status wildlife species, nesting bird, or federal- or state-listed special-status plant species. In Watershed Environmental's April 10, 2019 biological assessment report we identified the following potential effects to wildlife that would be addressed in the habitat protection plan:

- **Wildlife Disturbance Caused by Night Lighting,** i.e., security lighting of adjacent riparian woodland habitat.

- **Special-Status Wildlife Species and Habitat,** i.e., California red-legged frogs, California tiger salamander, southwestern willow flycatcher, western pond turtle, southern steelhead, and southwestern willow flycatcher.

In response to a request from the CDFW, Watershed Environmental biologist Mark de la Garza and Storrer Environmental biologist John Storrer performed an aquatic survey on June 4, 2019 in 2 ponds southwest of the proposed cannabis processing barn to determine if California red-legged frog or California tiger salamander were using these ponds to breed. This survey was performed under John's USFWS Federal Recovery Permit (No. TE817397-5) and CDFW Scientific Collecting Permit (No. 3560) for California tiger salamander. We found neither species and sent a letter report summarizing our survey methods and results to USFWS, CDFW, and the County.

The following California tiger salamander *(Ambystorna calforniense)* impact avoidance measures, specified in the *General Conservation Plan for Cultivation Activities* have been incorporated into this Habitat Protection Plan to avoid and minimize impacts to California tiger salamander and to meet USFWS 10(a)(1)B permit requirements:

1. 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.
2. 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.
3. 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.
4. 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.

5. 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.
6. 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.
7. 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.
8. 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.
9. 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.
10. 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 Measure 12.
11. 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 Measure 12.
12. 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_Arnphibian_T ask_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.

13. 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 Measure 12.

14. 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 Measure 12.

15. All construction and sediment control fencing will be inspected each work day during construction activities to ensure they are functioning properly.

16. 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 measures will be taken to prevent wildlife entrapment.

17. 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 Measure 12.
18. 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 Measure 10 above).
19. 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.
20. 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.
21. 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
22. 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.

John Storrer and Mark de la Garza also performed an avian survey on June 12, 2019 per CDFW's direction to determine if least Bell's vireo or southwestern willow flycatcher were present or nesting in the riparian woodland habitat adjacent to (south of) the proposed 16.53-acre cannabis cultivation site (Area A). We found no least Bell's vireos or southwestern willow flycatchers, so Watershed Environmental has concluded that the project will not impact any California tiger salamanders, California red-legged frogs, least Bell's vireos, or southwestern willow flycatchers.

- As a precautionary measure to ensure that western pond turtles and California red-legged frogs that may be present in the Santa Ynez River do not accidentally enter the cannabis cultivation area (Area A) closest to the Santa Ynez River, we continue to recommend installing silt fencing and/or fabric screening on the southern, eastern, and western sides of the security perimeter fencing of the cultivation site.

- To ensure that security lighting does not disturb wildlife in adjacent riparian woodland habitat, the applicant shall install shields around security lights to direct lights downward and prevent them from shining toward riparian woodland vegetation or the riparian setback revegetation area. After installation, the lights shall be turned on and a County-approved biologist will inspect the site at night and take photographs/video verifying that they and any other project lights are properly shielded. He or she shall notify the County and CDFW in writing about applicant compliance and the effectiveness of this mitigation measure.

Wildlife Movement Plan

The County's Cannabis Land Use Ordinance and Licensing Program requires an applicant for land use entitlement for a commercial cannabis activity to prepare a wildlife movement plan for activities in or near wildlife movement areas. The April 10, 2019 biological assessment report Watershed Environmental, Inc. prepared for this project identified the following potential effects to wildlife that would be addressed in the wildlife movement plan:

- **Wildlife Disturbance Caused by Night Lighting,** i.e., security lighting of adjacent riparian woodland habitat.
- **Special-Status Wildlife Species and Habitat,** i.e., California red-legged frogs, southwestern willow flycatcher, and western pond turtle, southern steelhead, southwestern willow flycatcher.

A County-approved biologist shall implement the following mitigation measures to protect wildlife movement:

1. Within 1 week of the start of site preparation activities in the cannabis cultivation area and before any cleanup, a qualified biologist will conduct presence/absence surveys for special-status species. If a California red-legged frog or any other state- or federally threatened or endangered species is found, it will not be harassed, harmed, pursued, hunted, shot, wounded, killed, trapped, captured, or collected by the biologist performing the survey. The biologist will cordon off the immediate area to prevent anyone from taking actions that may cause injury or significantly disrupt normal wildlife behavior patterns such as breeding, feeding, or sheltering. Site preparation and all other activity will be halted until the animal has left on its own. Site preparation and clean-up will resume only if surveys determine that California red-legged frogs and other state- or federally threatened or endangered species are absent from the project site.
2. A qualified biologist shall be present during site preparation activities when existing vegetation is removed and planting rows are created in the cannabis cultivation areas. The biologist shall also be present when cleanup and revegetation activities occur in previously disturbed watercourse setback areas. If any non-listed sensitive species are found (i.e., CDFW Species of

Special Concern), the biologist shall relocate these animals to suitable habitat outside of the project area.

3. A qualified biologist shall monitor installation of plant materials in the riparian setback revegetation area, ensuring there are no special-status species in the revegetation area and that "take" of federal- or state-listed endangered, threatened, and candidate species does not occur.
4. Ground disturbance, vegetation removal, debris removal/clean up, and revegetation activities within 500 ft. of riparian woodland vegetation shall not occur during bird breeding season (February 1 through September 1). If such activities must occur at that time, a qualified biologist will complete pre-construction breeding bird surveys. Nesting bird pre-construction surveys shall occur within the area to be disturbed and extend outward 500 ft. or to the property boundary. Bird surveys shall be conducted by a County-approved biologist familiar with identifying raptors and other birds. If any occupied bird nests or cavity roosts are found, the biologist shall determine an appropriate nest/cavity roost buffer zone (500 ft. for raptor nests and 300 ft. for passerine nests) that considers the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. The buffer zone shall be sized to ensure birds do not abandon their nest/cavity roost due to project-related disturbance. The buffer will be demarcated with signage, survey tape, or fencing to be clearly visible to personnel with access to the project site. All personnel will be notified of the nest buffer and advised that they are prohibited from entering the area. No ground disturbance or project-related activities shall occur within the buffer until the biologist confirms that breeding/nesting is complete and all young birds have fledged. Pre-construction nesting bird surveys are not required for project activities that occur 500 ft. or more from the edge of the riparian woodland canopy or for activities within 500 ft. of the riparian canopy that occur between September 1 and February 1.

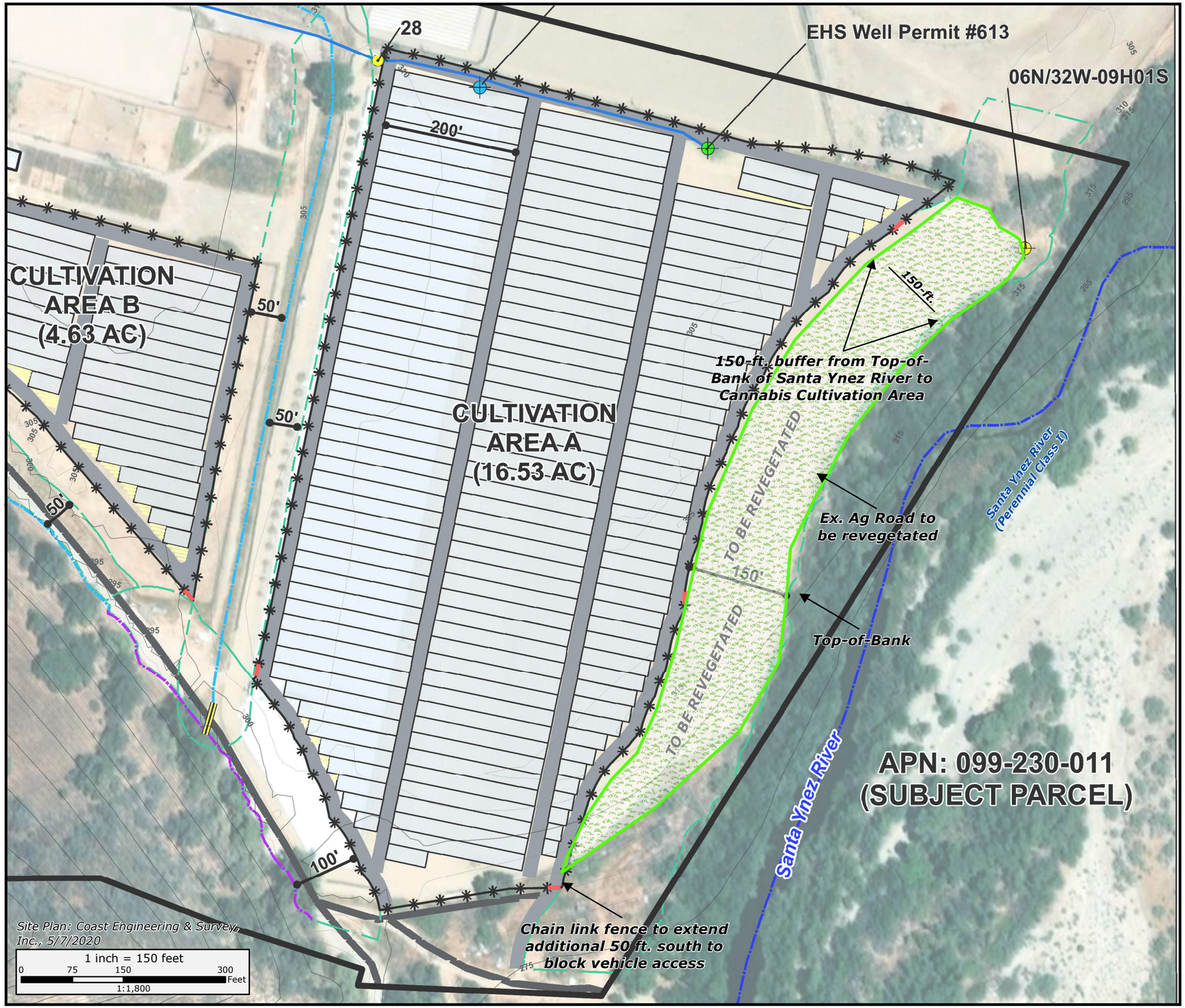
If you have any questions regarding this revegetation, habitat protection, tree protection, and wildlife movement plan, please give me a call at (805) 729-1070.

Sincerely,

Mark de la Garza
President, Watershed Environmental, Inc.

cc: Troy White
Rachel Henry (USFWS)

Attachment 1. Revegetation, Habitat and Tree Protection, and Wildlife Movement Plan Figure



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Map Items

Property Boundary (APN: 099-230-034)

Chain Link Fence (6-8 ft.) per Site Plan
(w/ silt fencing on all perimeters)

Revegetation Area (3.28 acres)

Revegetation Plan

150-ft. buffer area from Top-of-Bank of Santa Ynez River will be revegetated with native trees, shrubs, and perennial grass plants. The existing ag road will be revegetated as well. The entire revegetation area will be 3.28 acres.

Chain link fencing along Cannabis Cultivation Area 'A' (16.53 acres) will block vehicle access to the revegetation area. An additional 50 ft. of chain link fencing will extend beyond the southern boundary of Cannabis Cultivation Area 'A' to further prevent vehicle access to the revegetation area.

Habitat and Tree Protection Plan

Sensitive habitat and native trees are located beyond the top-of-bank of the Santa Ynez River. Chain link fencing along Cannabis Cultivation Area 'A' and the Revegetation Area will block vehicle access to sensitive habitat and native trees.

Silt fencing installed along the chain link fencing around the entire perimeter of Cannabis Cultivation Area 'A' and 'B' will prevent small mammals/reptiles/ amphibians from entering the site.

Revegetation Plan, Habitat and Tree Protection Plan, and Wildlife Movement Plan Figure

BIOLOGICAL ASSESSMENT
COMMERCIAL CANNABIS CULTIVATION PROJECT
2200 W. Highway 246 (APN: 099-230-034)
Buellton, California

Watershed Environmental, Inc. 5/7/2020