

EXHIBIT M – KIT FOX MITIGATION STUDY

Milner / White-Chaples

DRC2019-00046

Included with this section is a Report Summarizing the Results of a San Joaquin Kit Fox Habitat Assessment and Survey of a Proposed Outdoor Cannabis Cultivation Site at 2560 McMillan Canyon Road, Shandon, California.



June 3, 2019

Ms. Julie White-Chaples
P.O. Box 4011
Paso Robles, CA 93447
oluvskin@gmail.com

Sent via email

RE: Letter Report Summarizing the Results of a San Joaquin Kit Fox Habitat Assessment and Survey of a Proposed Outdoor Cannabis Cultivation Site at 2560 McMillan Canyon Road, Shandon, California

Dear Ms. White-Chaples,

Terra Verde Environmental Consulting, LLC (Terra Verde) has prepared this letter report to aid the County of San Luis Obispo (County) and California Department of Fish and Wildlife (CDFW) in evaluating the proposed 1,000-square-foot cannabis cultivation site's (project site) potential impacts to the San Joaquin kit fox (*Vulpes macrotis mutica*). This species is listed as *endangered* by U.S. Fish and Wildlife Service and as *threatened* by the State of California. The proposed project is at 2560 McMillan Canyon Road located in Shandon, San Luis Obispo County, California (see Attachment A – Figure 1: Project Vicinity and Project Site Map) and will be constructed within an existing disturbed area. A qualified biologist conducted a San Joaquin kit fox habitat assessment consisting of a background review of historically documented kit fox observations and a site visit during which existing site conditions were noted; the overall biological community was identified; and the property was surveyed for the presence of suitable habitat, sign, or direct observations of San Joaquin kit fox.

The Terra Verde qualified biologist determined that San Joaquin kit foxes would not be impacted by the project and that a full Biological Resources Assessment is not warranted. Details that led to this conclusion are described below.



Methods

Prior to conducting the field survey, a background review of available information and literature pertaining to sensitive resources that have been documented in the vicinity of the proposed project was conducted, including:

- Aerial photographs (Google Earth, 1994-2018)
- USGS topographic quadrangle map (2019)
- A map of special-status species that have been documented in the California Natural Diversity Database (CNDDDB) within a two-mile radius of the property (CDFW 2019)
- A map of San Joaquin kit fox occurrences in the CNDDDB within a 10-mile radius of the property (CDFW 2019)
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map (USFWS 2019a)
- USFWS Critical Habitat Portal (USFWS 2019b)

On May 29, 2019, Terra Verde senior biologist Robyn Powers conducted the field survey. The survey area included the 1,000-square-foot proposed project site and its immediate surroundings, as well as a reconnaissance-level survey of approximately 14 acres of undeveloped land and access routes on the property (see Attachment A – Figure 1: Project Vicinity and Project Site Map). The field survey focused on the identification of San Joaquin kit fox habitat and sign. Dominant plant species and other wildlife observations were noted.

Results

Existing Site Conditions and General Observations

The project site is a 1,000-square-foot area, previously used as a dog kennel, within an approximately 35-acre residential and agricultural property (see Attachment B – Photos 1 and 2). The topography of the project site is nearly flat, with elevations ranging from 1,617 to 1,618 feet. A variety of non-native perennial and annual herbs currently grow in the project site, and include white horehound (*Marrubium vulgare*), cheeseweed mallow (*Malva parviflora*), and wild mustard (*Hirschfeldia incana*). It lies approximately 30 feet from the eastern fence line, which separates the property from land that has been actively farmed for more than 25 years. Parking and storage areas, as well as a chicken coop, a corral, and an outdoor kennel housing domestic animals directly surround the project site (see Attachment B – Photos 3 and 4). A single-family residence with associated landscaping is approximately 200 feet to the southwest and approximately 1,500 square feet of solar panels are south of the residence. South of the project site lies an approximately 2-acre olive grove. Access to the project site is via a paved driveway that runs from unpaved McMillan Canyon Road to the structures described above.



The undeveloped space of the property consists of ruderal herbaceous cover and annual grassland that is dominated by non-native annual grasses and forbs (see Attachment B – Photos 5 and 6). Dominant nonnative species surrounding the property include those listed for the project site as well as ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis* ssp. *rubens*), Italian thistle (*Carduus pycnocephalus*), bull thistle (*Cirsium vulgare*), and Maltese star thistle (*Centaurea melitensis*). A native plant, purple owl's clover (*Castilleja exserta*), was also observed. The gently sloped areas of the property, those surrounding the residence and project site, are mowed several times each year to serve as a fire break and the property is grazed by horses and cattle. Wildlife observed on the property during the survey included California ground squirrels (*Otospermophilus beecheyi*), red-tailed hawks (*Buteo jamaicensis*), American crows (*Corvus brachyrhynchos*), a barn owl (*Tyto alba*), desert cottontails (*Sylvilagus audubonii*), and painted lady butterflies (*Vanessa cardui*). An ephemeral stream runs parallel to McMillan Canyon Road on the western edge of the property approximately 650 feet from the project site. Lands surrounding the property consist primarily of agricultural lands that are actively farmed and grazed.

No San Joaquin kit foxes, scat, tracks, or potential dens were observed.

CNDDB Records Search Results

Two special-status species have been recorded in the CNDDB within two miles of the project site: prairie falcon (*Falco mexicanus*; California Watch List) and Swainson's hawk (*Buteo swainsoni*; California-designated threatened and USFWS Bird of Conservation Concern). The prairie falcon record was from the 1970s and the Swainson's hawk record was from the 1940s. However, there is local biological knowledge of more recent Swainson's hawk observations along State Route (SR) 46.

There are 15 records of San Joaquin kit fox observations in the CNDDB within 10 miles of the project site, from the 1970s to present (see Attachment A – Figure 2: 10-Mile CNDDB San Joaquin Kit Fox Map). The nearest observation was 3.3 miles southeast of the project site near SR 46, documented in 1975. The nearest observation during the last 10 years was 4.3 miles southwest of the project site, documented in 2014. Additional observations have been recorded in surrounding areas, such as Whitley Gardens, Shandon Flat, San Juan Valley, Cholame Valley, and various locations along SR 46.



Discussion and Recommendations

Suitability of the Property for San Joaquin Kit Fox

Although kit foxes occur in the region of the project site, no San Joaquin kit foxes or their sign (e.g., scat or tracks) were observed in the survey area. Recorded observations of kit foxes within 10 miles of the site have generally occurred in relatively flat, undisturbed areas (at the time of the observations). The project site is located in the yard of a residence, in a disturbed area, adjacent to pens of domesticated animals. Lands directly to the east are actively farmed. Habitat that is considered highly suitable for kit fox use includes gently rolling hills or flat terrain, dominated by red brome fields or saltbush scrublands (*Atriplex* sp.) and agricultural land has been reported as unsuitable (Grinnel et al. 1937; White et al. 1995; USFWS 1998; Warrick and Cypher 1998; Cypher et al. 2000; Smith et al. 2005; Warrick et al. 2007). Kit foxes are optimally adapted to areas with sparse vegetation and a high proportion of bare ground (Grinnel et al. 1937, McGrew 1979); therefore, habitat suitability decreases as vegetation density increases. At the time of the survey, the undeveloped portions of land on the property contained 2- to 4-foot-tall, thick vegetation with frequent occurrences of thistle, through which a kit fox would have difficulty maneuvering. Although these areas will be mowed or grazed, transient kit foxes would likely be deterred by the presence of domestic dogs on the property. Further, when the habitat suitability model developed by Cypher et al. (2013) is applied to the project site and surrounding property it portrays low to no suitable habitat within the project site and only small (less than 10 acres), fragmented moderately suitable patches on the property. This is likely due to nonbeneficial land uses and the steepness of portions of the property.

Project Scale and Construction Plans

The small scale of this project (1,000 square feet) makes it highly unlikely to affect native wildlife, including San Joaquin kit foxes. No heavy equipment is necessary, there will be no major ground disturbance, and no trees or shrubs will be removed. All construction will be completed using hand tools and will include the installation of a chain link fence, aboveground potted cannabis plants, an irrigation system, and security system. The lights associated with the security system will be motion-activated and directed toward the cultivation site. All construction activities will take place within the existing disturbed footprint. Access to the site will be via the existing paved driveway. Cannabis will be cultivated on site, but it will be removed from the site and processed and stored at a separate facility.



Recommendations

The property is situated within the County-designated 3:1 mitigation area for San Joaquin kit fox. In accordance with the County Guide to San Joaquin Kit Fox Mitigation Procedures under CEQA, Standard Kit Fox CEQA Mitigation Measures shall be included on development plans. The following summarizes those that are applicable to this project:

- The applicant shall mitigate for the loss of San Joaquin kit fox habitat either by:
 1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
 2. Depositing funds into an approved in-lieu fee program; or
 3. Purchasing credits in an approved conservation bank in San Luis Obispo County.
- A maximum 25 mph speed limit shall be required at the project site during construction activities.
- All construction activities shall cease at dusk and not start before dawn.
- All excavations deeper than 2 feet shall be completely covered at the end of each working day.
- All pipes, culverts, or similar structures shall be inspected for San Joaquin kit fox and other wildlife before burying, capping, or moving.
- All exposed openings of pipes, culverts, or similar structures shall be capped or temporarily sealed prior to the end of each working day.
- All food-related trash shall be removed from the site at the end of each work day.
- Disturbance to burrows shall be avoided to the greatest extent feasible.
- No rodenticides or herbicides shall be applied in the project area.

Implementation of these recommended avoidance, minimization, and mitigation measures will reduce impacts to sensitive resources to a less than significant level.



In conclusion, because of the small scale of the project site, the low-impact construction methods, and the existing disturbed conditions of the site, San Joaquin kit foxes and other wildlife are unlikely to be impacted and a full biological resources assessment is not warranted.

Should you have any questions regarding any of the information provided, please contact me at rpowers@terraverdeweb.com or (702) 610-6308.

Sincerely,

A handwritten signature in cursive script that reads "Robyn Powers".

Robyn Powers, Senior Biologist

Attachments:

A – Figures

Figure 1: Project Vicinity and Survey Area Map

Figure 2: 10-mile CNDDDB San Joaquin Kit Fox Map

B – Representative Site Photographs



References

- California Department of Fish and Wildlife. 2019. California Natural Diversity Database: RareFind 5. Accessible online with subscription at: <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>. Accessed May 2019.
- Cypher, B. L., S. E. Phillips, and P. A. Kelly. 2013. Quantity and distribution of suitable habitat for endangered San Joaquin kit foxes: conservation implications. *Canid Biology and Conservation* 16(7): 25—31.
- Cypher, B. L., G. D. Warrick, M. R. M. Otten, T. P. O'Farrell, W. H. Berry, C. E. Harris, T. T. Kato, P. M. McCue, J. H. Scrivner, and B. W. Zoellick. 2000. Population dynamics of San Joaquin kit foxes at the Naval Petroleum Reserves in California. *Wildlife Monographs* 45:1—43.
- Google Earth Pro V 7.1.8.3036 (May 2019). 1994-2018. Shandon, California. DigitalGlobe. Accessed May 2019.
- Grinnell, J., D. S. Dixon, J. M. Linsdale. 1937. Fur-bearing mammals of California. Vol 2. University of California Press, Berkeley.
- McGrew, J. C. 1979. *Vulpes macrotis*. *Mammalian Species* 123:1—6.
- Smith, D. A., K. Ralls, B. L. Cypher, H. O. Clark, Jr., P. A. Kelly, D. F. Williams, and J. E. Maldonado. 2006. Relative abundance of endangered San Joaquin kit foxes (*Vulpes macrotis mutica*) based on scat-detection dog surveys. *Southwestern Naturalist* 51:210—219.
- United States Department of the Interior, Geological Survey. 2019. Cholame, California 7.5-minute Quadrangle. Available online at: <https://store.usgs.gov/>. Accessed May 2019.
- U. S. Fish and Wildlife Service. 1998. Recovery plan for upland species of the San Joaquin Valley, California. U. S. Fish and Wildlife Service, Region 1, Portland.
- 2019a. USFWS Threatened and Endangered Species Active Critical Habitat Portal. Available online at: <http://crithab.fws.gov/ecp/report/table/critical-habitat.html>. Accessed March 2019
- 2019b. National Wetland Inventory Mapper. Available online at: <https://www.fws.gov/wetlands/Data/Mapper.html>. Accessed March 2019.
- Warrick, G. D. and B. L. Cypher. 1998. Factors affecting the spatial distribution of a kit fox population. *Journal of Wildlife Management* 62:707—717.
- Warrick, G. D., H. O. Clark, Jr., P. A. Kelly, D. F. Williams, and B. L. Cypher. 2007. Use of agricultural lands by San Joaquin kit foxes. *Western North American Naturalist* 67:270—277.



White, P. J., K. Ralls, and C. A. Vanderbilt-White. 1995. Overlap in habitat and food use between coyotes and San Joaquin kit foxes. *Southwestern Naturalist* 40:342—34.



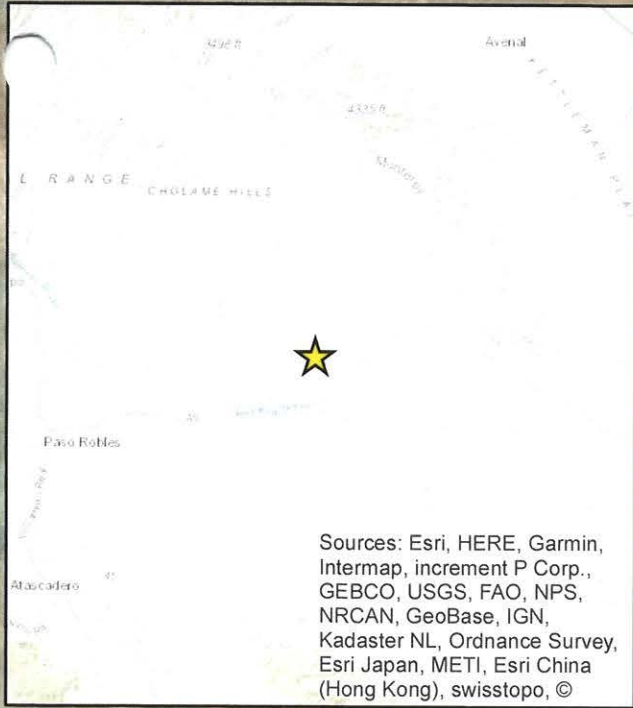
ATTACHMENT A - FIGURES

Figure 1: Project Vicinity and Survey Area Map

Figure 2: 10-mile CNDDDB San Joaquin Kit Fox Map




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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

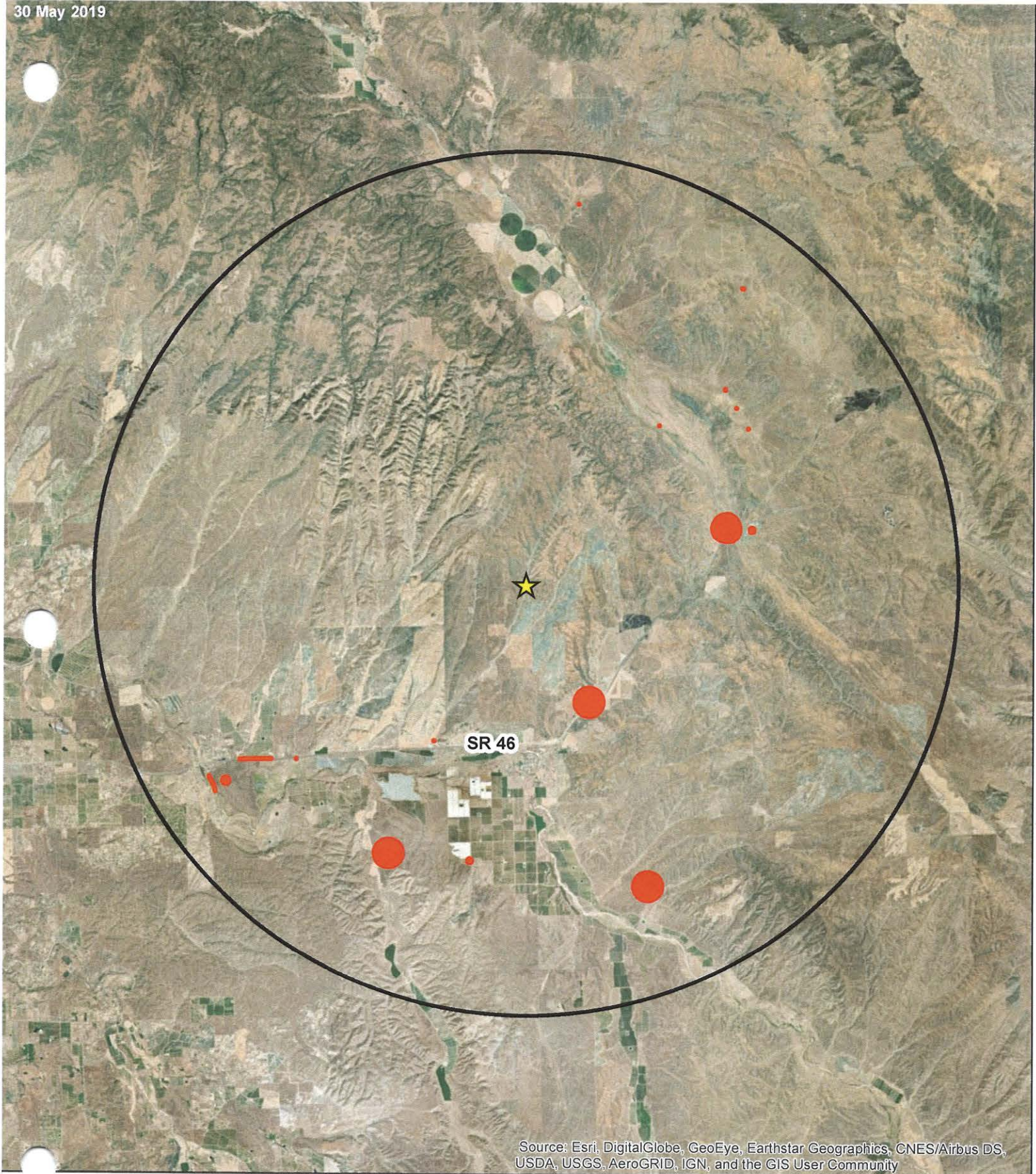
2560 McMillan Canyon, Shandon, California
Figure 1 - Vicinity and Project Site Map

-  Property Location
-  Proposed Cannabis Cultivation Site
-  Approximate Survey Area





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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

2560 McMillan Canyon, Shandon, California
Figure 2 - 10-mile CNDDDB SJKF Map

★ Property Location CNDDDB Occurrences
■ San Joaquin kit fox





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ATTACHMENT B – REPRESENTATIVE SITE PHOTOGRAPHS



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Photo 1. View from east side of project site to west (May 29, 2019).



Photo 2. View from west side of project site to east (May 29, 2019).



Photo 3. View from approximately 150 feet south of project site. Photo depicts the parking areas and general surroundings (May 29, 2019).



Photo 4. View from directly south of project site toward the east. Photo depicts adjacent corral, shed, and parking area (May 29, 2019).

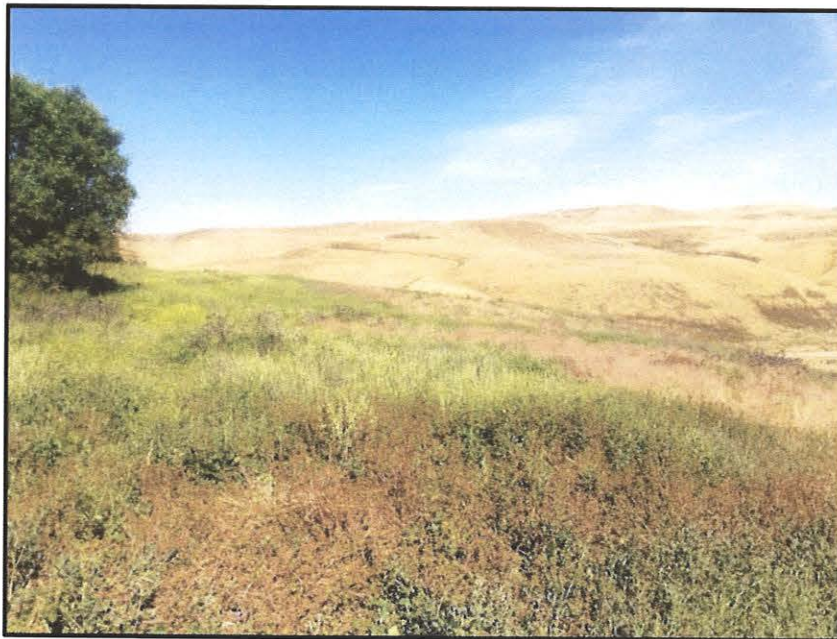


Photo 5. View from directly north of project site toward the west. Photo depicts dense ruderal herbaceous cover (May 29, 2019).



Photo 6. View from north of project site toward the south. Photo depicts dense ruderal herbaceous cover with project site in the background (May 29, 2019).



July 30, 2020

Ms. Julie White-Chaples
P.O. Box 4011
Paso Robles, CA 93447
oluvskin@gmail.com

Sent via email

RE: Letter Report Summarizing the Results of a San Joaquin Kit Fox Habitat Assessment and Survey of a Proposed Outdoor Cannabis Cultivation Site at 2560 McMillan Canyon Road, Shandon, California

Dear Ms. White-Chaples,

Terra Verde Environmental Consulting, LLC (Terra Verde) has prepared this letter report to aid the County of San Luis Obispo (County) and California Department of Fish and Wildlife (CDFW) in evaluating the proposed 11,520-square-foot (0.26-acre) cannabis cultivation site's (project site) potential impacts to the San Joaquin kit fox (*Vulpes macrotis mutica*). This species is listed as *endangered* by U.S. Fish and Wildlife Service and as *threatened* by the State of California. The proposed project is at 2560 McMillan Canyon Road located in Shandon, San Luis Obispo County, California (see Attachment A – Figure 1: Project Vicinity and Project Site Map) and will be constructed within an existing disturbed area. A qualified biologist conducted a San Joaquin kit fox habitat assessment consisting of a background review of historically documented kit fox observations and a site visit during which existing site conditions were noted; the overall biological community was identified; and the property was surveyed for the presence of suitable habitat, sign, or direct observations of San Joaquin kit fox.

The Terra Verde qualified biologist determined that San Joaquin kit foxes would not be impacted by the project and that a full biological resources assessment is likely not warranted. Details that led to this conclusion are described below.



Methods

Prior to conducting the field survey, a background review of available information and literature pertaining to sensitive resources that have been documented in the vicinity of the proposed project was conducted, including:

- Aerial photographs (Google Earth, 1994-2018)
- U.S. Geological Survey topographic quadrangle map (2019)
- A map of special-status species that have been documented in the California Natural Diversity Database (CNDDDB) within a two-mile radius of the property (CDFW 2019)
- A map of San Joaquin kit fox occurrences in the CNDDDB within a 10-mile radius of the property (CDFW 2019)
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory map (USFWS 2019a)
- USFWS Critical Habitat Portal (USFWS 2019b)

On May 29, 2019, Terra Verde senior wildlife biologist Robyn Powers conducted the field survey. The survey area included the 11,520-square-foot project site, consisting of 9,600 square feet of proposed canopy space and 1,920 square feet of working space, and its immediate surroundings, as well as a reconnaissance-level survey of approximately 14 acres of undeveloped land and access routes on the property (see Attachment A – Figure 1: Project Vicinity and Project Site Map). The field survey focused on the identification of San Joaquin kit fox habitat and sign. Dominant plant species and other wildlife observations were noted.

Results

Existing Site Conditions and General Observations

The project site totals 11,520 square feet within an approximately 35-acre residential and agricultural property (see Attachment B – Photos 1 and 2). The 9,600-square-foot proposed canopy space is planned mostly in an area with compacted soils that was previously used as a dog kennel. The remaining proposed 1,920-square-foot work area surrounding the canopy space is currently used for parking and a driveway. The topography of the project site is nearly flat, with elevations ranging from 1,617 to 1,618 feet. A variety of non-native perennial and annual herbs currently grow in the project site, and include white horehound (*Marrubium vulgare*), cheeseweed mallow (*Malva parviflora*), and wild mustard (*Hirschfeldia incana*). It lies approximately 30 feet from the eastern fence line, which separates the property from land that has been actively farmed for more than 25 years. Parking and storage areas, as well as a chicken coop, a corral, and an outdoor kennel housing domestic animals directly surround the project site (see Attachment B – Photos 3 and 4). A single-family residence with associated landscaping



is approximately 200 feet to the southwest and approximately 1,500 square feet of solar panels are south of the residence. South of the project site lies an approximately 2-acre olive grove. Access to the project site is via a paved driveway that runs from paved McMillan Canyon Road to the structures described above.

The undeveloped space of the property consists of ruderal herbaceous cover and annual grassland that is dominated by non-native annual grasses and forbs (see Attachment B – Photos 5 and 6). Dominant nonnative species surrounding the property include those listed for the project site as well as ripgut brome (*Bromus diandrus*), red brome (*Bromus madritensis* ssp. *rubens*), Italian thistle (*Carduus pycnocephalus*), bull thistle (*Cirsium vulgare*), and Maltese star thistle (*Centaurea melitensis*). A native plant, purple owl's clover (*Castilleja exserta*), was also observed. The gently sloped areas of the property, those surrounding the residence and project site, are mowed several times each year to serve as a fire break and the property is grazed by horses and cattle. Wildlife observed on the property during the survey included California ground squirrels (*Otospermophilus beecheyi*), red-tailed hawks (*Buteo jamaicensis*), American crows (*Corvus brachyrhynchos*), a barn owl (*Tyto alba*), desert cottontails (*Sylvilagus audubonii*), and painted lady butterflies (*Vanessa cardui*). An ephemeral stream runs parallel to McMillan Canyon Road on the western edge of the property approximately 650 feet from the project site. Lands surrounding the property consist primarily of agricultural lands that are actively farmed and grazed.

No San Joaquin kit foxes, scat, tracks, or potential dens were observed.

CNDDDB Records Search Results

Two special-status species have been recorded in the CNDDDB within two miles of the project site: prairie falcon (*Falco mexicanus*; California Watch List) and Swainson's hawk (*Buteo swainsoni*; California-designated threatened and USFWS Bird of Conservation Concern). The prairie falcon record was from the 1970s and the Swainson's hawk record was from the 1940s. However, there is local biological knowledge of more recent Swainson's hawk observations along State Route (SR) 46.

There are 15 records of San Joaquin kit fox observations in the CNDDDB within 10 miles of the project site, from the 1970s to present (see Attachment A – Figure 2: 10-Mile CNDDDB San Joaquin Kit Fox Map). The nearest observation was 3.3 miles southeast of the project site near SR 46, documented in 1975. The nearest observation during the last 10 years was 4.3 miles southwest of the project site, documented in 2014. Additional observations have been recorded in



surrounding areas, such as Whitley Gardens, Shandon Flat, San Juan Valley, Cholame Valley, and various locations along SR 46.

Discussion and Recommendations

Suitability of the Property for San Joaquin Kit Fox

Although kit foxes occur in the region of the project site, no San Joaquin kit foxes or their sign (e.g., scat or tracks) were observed in the survey area. Recorded observations of kit foxes within 10 miles of the site have generally occurred in relatively flat, undisturbed areas (at the time of the observations). The project site is located in the yard of a residence, in a disturbed area, adjacent to pens of domesticated animals. Lands directly to the east are actively farmed. Habitat that is considered highly suitable for kit fox use includes gently rolling hills or flat terrain, dominated by red brome fields or saltbush scrublands (*Atriplex* sp.) and agricultural land has been reported as unsuitable (Grinnel et al. 1937; White et al. 1995; USFWS 1998; Warrick and Cypher 1998; Cypher et al. 2000; Smith et al. 2005; Warrick et al. 2007). Kit foxes are optimally adapted to areas with sparse vegetation and a high proportion of bare ground (Grinnel et al. 1937, McGrew 1979); therefore, habitat suitability decreases as vegetation density increases. At the time of the survey, the undeveloped portions of land on the property contained 2- to 4-foot-tall, thick vegetation with frequent occurrences of thistle, through which a kit fox would have difficulty maneuvering. Although these areas will be mowed or grazed, transient kit foxes would likely be deterred by the presence of domestic dogs on the property. Further, when the habitat suitability model developed by Cypher et al. (2013) is applied to the project site and surrounding property it portrays low to no suitable habitat within the project site and only small (less than 10 acres), fragmented moderately suitable patches on the property. This is likely due to nonbeneficial land uses and the steepness of portions of the property.

Project Scale and Construction Plans

The small scale of this project makes it highly unlikely to affect native wildlife, including San Joaquin kit foxes. No heavy equipment is necessary, there will be no major ground disturbance, and no trees or shrubs will be removed. All construction will be completed using hand tools and will include the installation of a chain link fence, aboveground potted cannabis plants, an irrigation system, and security system. The lights associated with the security system will be motion-activated and directed toward the cultivation site. All construction activities will take place within the existing disturbed footprint. Access to the site will be via the existing paved driveway. Cannabis will be cultivated on site, but it will be removed from the site and processed and stored at a separate facility.



Recommendations

The property is situated within the County-designated 3:1 mitigation area for San Joaquin kit fox. In accordance with the County Guide to San Joaquin Kit Fox Mitigation Procedures under CEQA, Standard Kit Fox CEQA Mitigation Measures shall be included on development plans. The following summarizes those that are applicable to this project:

- The applicant shall mitigate for the loss of San Joaquin kit fox habitat either by:
 1. Establishing a conservation easement on-site or off-site in a suitable San Luis Obispo County location and provide a non-wasting endowment for management and monitoring of the property in perpetuity;
 2. Depositing funds into an approved in-lieu fee program; or
 3. Purchasing credits in an approved conservation bank in San Luis Obispo County.
- A maximum 25-mph speed limit shall be required at the project site during construction activities.
- All construction activities shall cease at dusk and not start before dawn.
- All excavations deeper than 2 feet shall be completely covered at the end of each working day.
- All pipes, culverts, or similar structures shall be inspected for San Joaquin kit fox and other wildlife before burying, capping, or moving.
- All exposed openings of pipes, culverts, or similar structures shall be capped or temporarily sealed prior to the end of each working day.
- All food-related trash shall be removed from the site at the end of each work day.
- Disturbance to burrows shall be avoided to the greatest extent feasible.
- No rodenticides or herbicides shall be applied in the project area.

Implementation of these recommended avoidance, minimization, and mitigation measures will reduce impacts to sensitive resources to a less than significant level.



In conclusion, because of the small scale of the project site, the low-impact construction methods, and the existing disturbed conditions of the site, San Joaquin kit foxes and other wildlife are unlikely to be impacted and a full biological resources assessment is not warranted.

Should you have any questions regarding any of the information provided, please contact me at rpowers@terraverdeweb.com or (702) 610-6308.

Sincerely,

A handwritten signature in blue ink that reads "Robyn Powers".

Robyn Powers, Senior Wildlife Biologist

Attachments:

A – Figures

Figure 1: Project Vicinity and Survey Area Map

Figure 2: 10-mile CNDDDB San Joaquin Kit Fox Map

B – Representative Site Photographs



References

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- Google Earth Pro V 7.1.8.3036 (May 2019). 1994-2018. Shandon, California. DigitalGlobe. Accessed May 2019.
- Grinnell, J., D. S. Dixon, J. M. Linsdale. 1937. Fur-bearing mammals of California. Vol 2. University of California Press, Berkeley.
- McGrew, J. C. 1979. *Vulpes macrotis*. *Mammalian Species* 123:1—6.
- Smith, D. A., K. Ralls, B. L. Cypher, H. O. Clark, Jr., P. A. Kelly, D. F. Williams, and J. E. Maldonado. 2006. Relative abundance of endangered San Joaquin kit foxes (*Vulpes macrotis mutica*) based on scat-detection dog surveys. *Southwestern Naturalist* 51:210—219.
- United States Department of the Interior, Geological Survey. 2019. Cholame, California 7.5-minute Quadrangle. Available online at: <https://store.usgs.gov/>. Accessed May 2019.
- U. S. Fish and Wildlife Service. 1998. Recovery plan for upland species of the San Joaquin Valley, California. U. S. Fish and Wildlife Service, Region 1, Portland.
- 2019a. USFWS Threatened and Endangered Species Active Critical Habitat Portal. Available online at: <http://crithab.fws.gov/ecp/report/table/critical-habitat.html>. Accessed March 2019
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- Warrick, G. D. and B. L. Cypher. 1998. Factors affecting the spatial distribution of a kit fox population. *Journal of Wildlife Management* 62:707—717.
- Warrick, G. D., H. O. Clark, Jr., P. A. Kelly, D. F. Williams, and B. L. Cypher. 2007. Use of agricultural lands by San Joaquin kit foxes. *Western North American Naturalist* 67:270—277.



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ATTACHMENT A - FIGURES

Figure 1: Project Vicinity and Survey Area Map

Figure 2: 10-mile CNDDDB San Joaquin Kit Fox Map



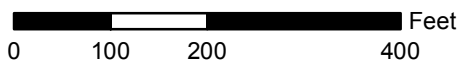
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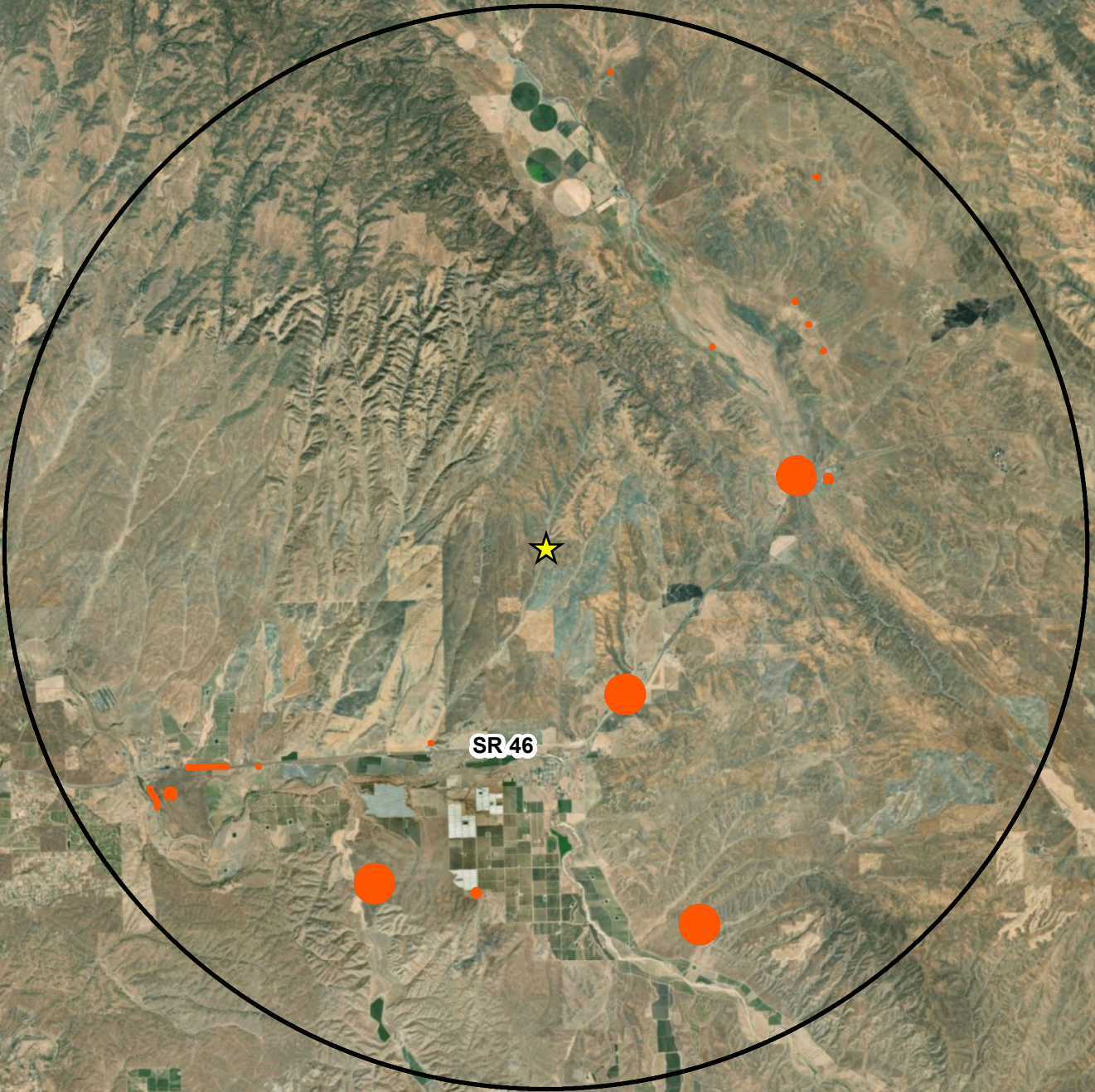


Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

2560 McMillan Canyon, Shandon, California Figure 1 - Vicinity and Project Site Map

- ★ Property Location
- Proposed Cannabis Cultivation Site
- Approximate Survey Area

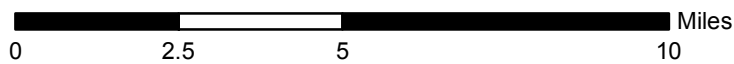




Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

2560 McMillan Canyon, Shandon, California
Figure 2 - 10-mile CNDDDB SJKF Map

★ Property Location CNDDDB Occurrences
San Joaquin kit fox





ATTACHMENT B – REPRESENTATIVE SITE PHOTOGRAPHS



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Photo 1. View from east side of project site to west (May 29, 2019).



Photo 2. View from west side of project site to east (May 29, 2019).



Photo 3. View from approximately 150 feet south of project site. Photo depicts the parking areas and general surroundings (May 29, 2019).



Photo 4. View from directly south of project site toward the east. Photo depicts adjacent corral, shed, and parking area (May 29, 2019).



Photo 5. View from directly north of project site toward the west. Photo depicts dense ruderal herbaceous cover in the foreground on the property (May 29, 2019).



Photo 6. View from north of project site toward the south. Photo depicts dense ruderal herbaceous cover with project site in the background (May 29, 2019).