



226 West Ojai Ave Ste 207

Ojai, CA 93023

805.633.9218

[www.paxenviro.com](http://www.paxenviro.com)

December 15, 2020

Attn: Integrated Agriculture  
P.O. Box 4730  
Paso Robles, CA 93447

C/O Lisa Bugrova  
Quest Planning

**RE: Addendum Memorandum to the Biological Resources Assessment (BRA) for a 7.31-acre Cannabis Cultivation Facility in Paso Robles (APN 033-011-026), San Luis Obispo County, CA**

Pax Environmental, Inc. (Pax) has prepared this Addendum Memorandum to the BRA for the proposed 7.31-acre cannabis cultivation facility on APN 033-011-026 in response to revisions to the site plan requested by the County Planning Department. The site plan revisions include the reconfiguration of the site plan to accommodate parcel setbacks by rotating the cultivation area 90°, shifting and shortening the access road, and extending the water line. These adjustments have reduced the overall impact by 1.45-acres and extended the disturbance to the edges of the original study area. The total new impact area is 5.86 acres. The original and revised project footprints and biological survey area are provided below in Figure 1.

As shown in Figure 1, the revised Project footprint was assessed during the original project BRA survey. These areas were assessed as dryland grain crops during the December 14, 2018 and January 5, 2019 survey visits, during which no sensitive or special-status species were observed. As determined from current and historical aerials, as well as photographs taken during the surveys (Figure 2), any potential indirect impact areas outside of the study area buffer appears to be dryland grain cropland consistent with mapped habitats in the Project study area. Impacts to these habitat types would be considered less than significant and would not require additional mitigation measures beyond those already proposed in the BRA. Furthermore, in accordance with the BRA, mitigation measures BR-1 (Tree Protection & Replacement Plan), BR-3 (Special Status Herpetofauna Avoidance & Minimization), BR-4 (American Badger Avoidance and Minimization), BR-5 (Burrowing Owl Avoidance & Minimization), and BR-6 (Preconstruction Surveys for Nesting Raptors & Birds) would require preconstruction surveys for the species potentially occurring in the study area and surrounding vicinity to avoid or reduce potential impacts to a level considered less than significant. No additional impacts to sensitive plants, wildlife, natural communities, or wildlife movement would be anticipated with revision of the site plan. Therefore, no additional mitigation measures are proposed.

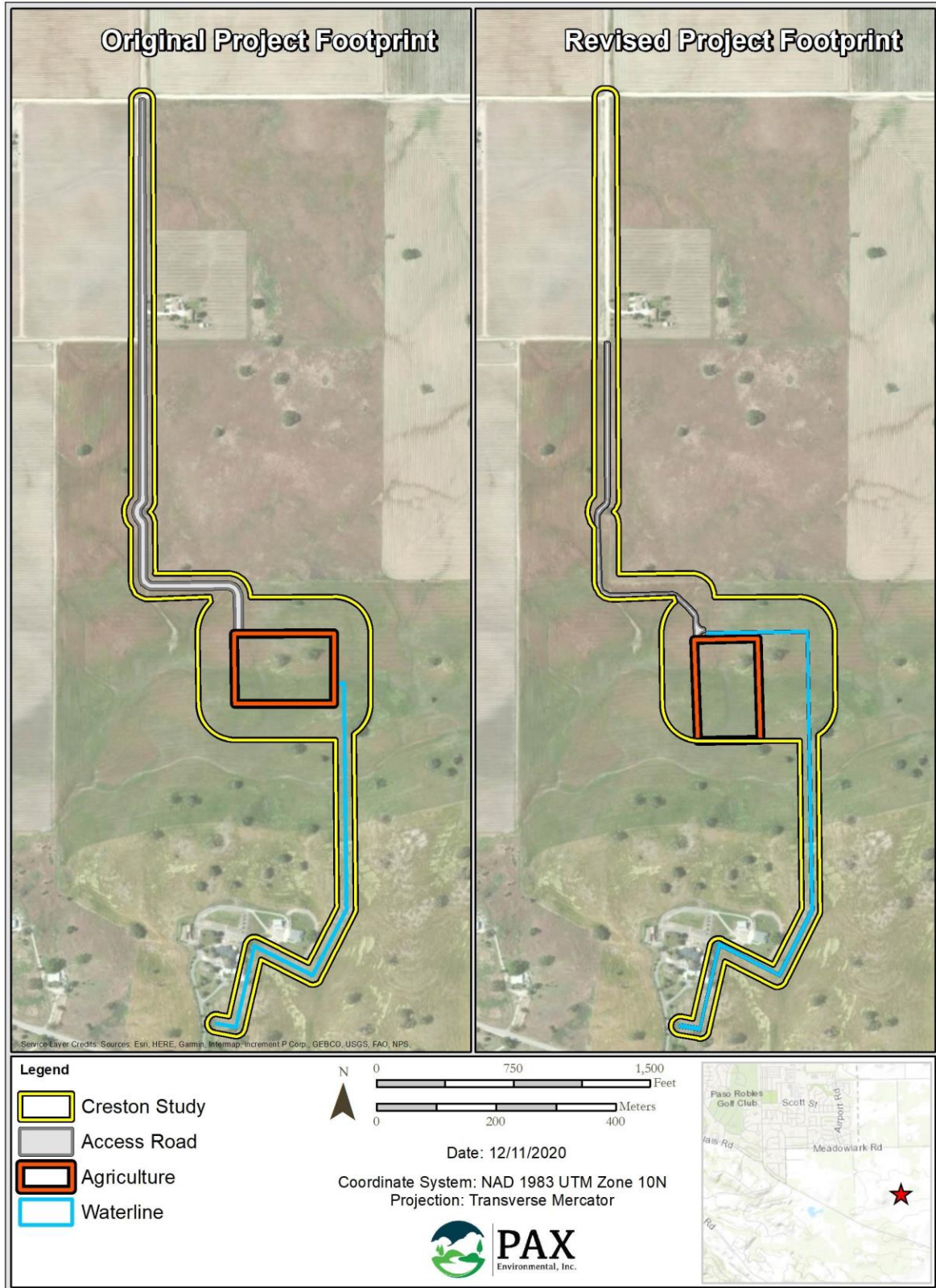


Figure 1. Original Project footprint (left), and revised Project footprint (right).



Figure 2: Project site as photographed from approximately 650 feet southeast facing northwest. The approximate revised cultivation area boundary is represented by a red polygon. Oak in foreground is not within project footprint and will not be impacted.

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Sam C. Stewart IV

December 15, 2020

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Date