

January 20, 2021

Attn: High Farms, LLC
135 Magnolia Avenue
Oxnard, CA 93030

C/O Mandi Pickens
Angle Planning, LLC.

RE: Addendum Memorandum to the Biological Resources Assessment (BRA) for a 2-acre Cannabis Cultivation Facility in Arroyo Grande (APN 047-271-031), San Luis Obispo County, CA

Pax Environmental, Inc. (Pax) has prepared this Addendum Memorandum to the Biological Resources Assessment (BRA) for the proposed 2-acre Cannabis Cultivation Facility in APN 047-271-031 in response to revisions to the site plan and peer-review comments. The site plan revisions include the conversion of an existing 10,500 square foot indoor nursery, a new 11,630 square foot ancillary nursery structure, and 1,200 square feet of solid waste/compost storage resulting in a total 0.55-acre of additional land uses. These new project features are proposed along the eastern project perimeter as depicted in the BRA. The original and revised project footprints and buffer areas are provided below in Figure 1.

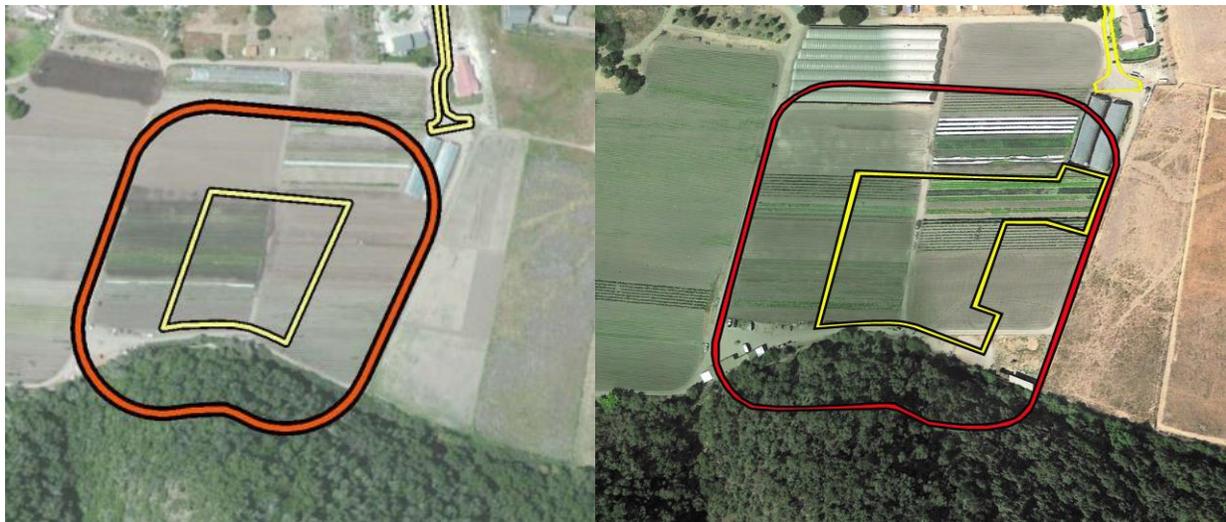
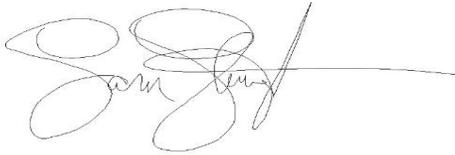


Figure 1. Project footprint (yellow) and survey area (red), including the original project description in the BRA (at left) and the revised footprint with additional ancillary land uses (at right).

As shown above in Figure 1, the revised footprint area was assessed in the survey area of the original project BRA. These areas consisted of irrigated row and field crops, barren and developed areas included in the 2019 focused botanical survey, during which no sensitive or special-status species were observed. 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, no additional impacts to sensitive plants, wildlife, natural communities, or wildlife movement would be anticipated with implementation of the additional project features. Therefore, no additional mitigation measures are proposed.

The County requested the addition of the monarch butterfly (*Danaus plexippus*) to the BRA analysis. This species was not originally included in the analysis because it is not officially recognized as rare, threatened or endangered. Nonetheless, the species is considered rare per County guidelines, recognized as declining throughout its range, and may become listed in the future. No trees or milkweed species were observed in the project impact footprint and the project would therefore not affect potentially suitable foraging or overwintering habitat, respectively. It is also more than 3.6 miles east of the nearest CDFW-designated Area of Conservation Emphasis (ACE) for the species. The row on the following page is hereby incorporated into Table 4 of the BRA by reference.



Sam C. Stewart IV

January 20, 2021

Date

Species	Status ¹		Habitat Description	Likelihood for Occurrence/Rationale ²
	USFWS	CDFW		
Invertebrates				
<i>Danaus plexippus</i> monarch butterfly	-	-	Forages in open meadows and fields with milkweed (<i>Asclepias spp.</i>) and forms overwintering roosting colonies in coastal tree groves.	Not expected (1)
2: LIKELIHOOD FOR OCCURRENCE		RATIONALE		
Not expected:	Not expected to occur	1: Lack of suitable habitat		
Low:	Low potential to occur	2: Lack of suitable substrate		
Moderate:	Moderate potential to occur	3: Beyond known elevation range		
High:	High potential to occur	4: Beyond known geographic range		
Present:	Known to occur	5: Marginally suitable habitat present		
		6: Suitable habitat present but no known records within one mile (or appropriate distance based on typically-sized territory for the species)		
		7: Suitable habitat present with known records within one mile (or appropriate distance based on typically-sized territory for the species)		
		8: Species or evidence of presence observed during survey		
		9: Overwintering migrant		