

AT&T Radio Frequency Safety Survey Report Prediction (RFSSRP)

Site Name: SVP Winery
FA#: 13790085
USID: 195368
Site ID: CSL02657
Address: 1010 Truesdale Road
Shandon, California 93461
County: San Luis Obispo
Latitude: 35.64396667
Longitude: -120.38119167
EBI Project Number: 6220002931

M-RFSC Name: Essie Polard
Site Structure Type: Monotree
PACE#: MRLOS036239/ MRLOS052685/
MRLOS033089/ MRLOS050925/ MRLOS059399/
MRLOS032274
Prepared For: AT&T Mobility, LLC
100 W Alondra Blvd
Gardena, California 90248



Report Information:

Report Writer: Erik Johnson
Report Date: July 14, 2020

CDs: CSL02657 - Rev 1 - 100ZD - 06-19-20

RFDS: LOS-ANGELES_L.A._CSL02657_2018-New-Site_FWLL-1C_mu3198_3551A08ZSJ_
13790085_195368_03-30-2018_As-Built-In-Progress_v1.00

Compliance Statement:

AT&T Mobility Compliance Statement: Based on the information collected, AT&T Mobility will be Compliant with FCC Rules and Regulations at the nearest walking surface if recommendations in the Compliance Summary are implemented.



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I.0 EXECUTIVE SUMMARY

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) modeling for AT&T Site CSL02657 located at 1010 Truesdale Road in Shandon, California to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Appendix A of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

I.1 SITE SUMMARY

Recommended Mitigation at the Site:

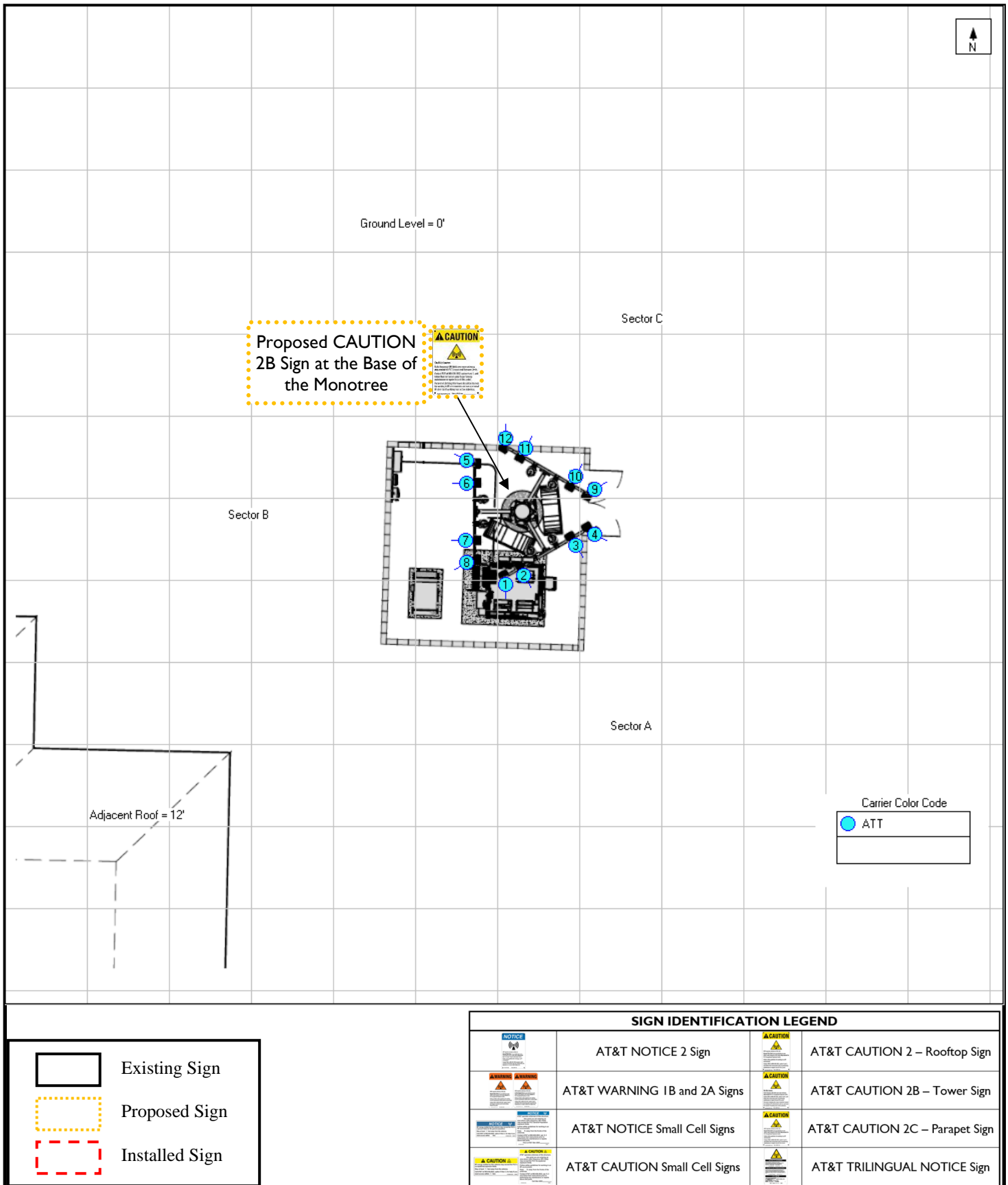
- Access Point(s):
 - To reduce the risk of exposure and/or injury, EBI recommends that access to the monotree or areas associated with the active antenna installation be restricted and secured where possible.
 - Yellow CAUTION 2B sign posted at the base of the monotree.
- Signage at AT&T Mobility Sectors:
 - A: No action required.
 - B: No action required.
 - C: No action required.
- Barriers at AT&T Mobility Sectors:
 - A: No action required.
 - B: No action required.
 - C: No action required.

Predictive Modeling Results:

The maximum predictive power density generated by the antennas is approximately 0.31 percent of the FCC's general public limit (0.06 percent of the FCC's occupational limit) at the adjacent roof level.

At the antenna face level, the maximum predictive power density generated by the antennas is approximately 3602.14 percent of the FCC's general public limit (720.428 percent of the FCC's occupational limit). At ground level, the maximum predictive power density generated by the antennas is approximately 0.2 percent of the FCC's general public limit (0.04 percent of the FCC's occupational limit).

2.0 SIGNAGE AND MITIGATION PLAN



3.0 ANTENNA INVENTORY

Ant #	Operator	Antenna Make	Antenna Model	Frequency (MHz)	Azimuth (deg.)	Mechanical Downtilt (deg.)	Horizontal Beamwidth (Degrees)	Aperture (feet)	Power Input (Watts)	Transmitter Count	Antenna Gain (dBd)	Total ERP (Watts)	Total EIRP (Watts)
1	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	180	0	28	6.0	25	4	18.15	5508.08	9033.25
2	ATT	ACE	XXQLH-654L8H8-iVT 04DT 700	700	150	0	67.9	8.0	40	4	12.75	2582.97	4236.08
2	ATT	ACE	XXQLH-654L8H8-iVT 04DT 850	850	150	0	60.8	8.0	40	4	13.55	3055.77	5011.45
2	ATT	ACE	XXQLH-654L8H8-iVT 02DT 1900	1900	150	0	66.5	8.0	40	4	14.85	4122.11	6760.27
2	ATT	ACE	XXQLH-654L8H8-iVT 02DT 2100	2100	150	0	62.7	8.0	40	4	14.85	4122.11	6760.27
3	ATT	QUINTEL	QS8658-7 04DT 700	700	150	0	70	8.0	40	4	11.65	2005.03	3288.24
4	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	120	0	28	6.0	25	4	18.15	5508.08	9033.25
5	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	300	0	28	6.0	25	4	18.15	5508.08	9033.25
6	ATT	ACE	XXQLH-654L8H8-iVT 04DT 700	700	270	0	67.9	8.0	40	4	12.75	2582.97	4236.08
6	ATT	ACE	XXQLH-654L8H8-iVT 04DT 850	850	270	0	60.8	8.0	40	4	13.55	3055.77	5011.45
6	ATT	ACE	XXQLH-654L8H8-iVT 02DT 1900	1900	270	0	66.5	8.0	40	4	14.85	4122.11	6760.27
6	ATT	ACE	XXQLH-654L8H8-iVT 02DT 2100	2100	270	0	62.7	8.0	40	4	14.85	4122.11	6760.27
7	ATT	QUINTEL	QS8658-7 04DT 700	700	270	0	70	8.0	40	4	11.65	2005.03	3288.24
8	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	240	0	28	6.0	25	4	18.15	5508.08	9033.25
9	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	60	0	28	6.0	25	4	18.15	5508.08	9033.25
10	ATT	ACE	XXQLH-654L8H8-iVT 04DT 700	700	30	0	67.9	8.0	40	4	12.75	2582.97	4236.08
10	ATT	ACE	XXQLH-654L8H8-iVT 04DT 850	850	30	0	60.8	8.0	40	4	13.55	3055.77	5011.45
10	ATT	ACE	XXQLH-654L8H8-iVT 02DT 1900	1900	30	0	66.5	8.0	40	4	14.85	4122.11	6760.27
10	ATT	ACE	XXQLH-654L8H8-iVT 02DT 2100	2100	30	0	62.7	8.0	40	4	14.85	4122.11	6760.27
11	ATT	QUINTEL	QS8658-7 04DT 700	700	30	0	70	8.0	40	4	11.65	2005.03	3288.24
12	ATT	CCI	HPA-33R-BUU-H6-06DT 2300	2300	0	0	28	6.0	25	4	18.15	5508.08	9033.25

- Note there are 4 AT&T panel antennas per sector at this site. For clarity, the different frequencies for each antenna are entered on separate lines.
- Note that microwaves were not included in the predictive modeling analysis because the onsite microwaves are considered compliant.

Ant #	NAME	X	Y	Antenna Radiation Centerline	Z-Height Adjacent Roof	Z-Height Ground
1	ATT	57.9	6.0	70.0	55.0	67.0
2	ATT	60.1	4.9	70.0	54.0	66.0
3	ATT	66.4	1.2	70.0	54.0	66.0
4	ATT	68.7	0.1	70.0	55.0	67.0
5	ATT	53.1	9.1	70.0	55.0	67.0
6	ATT	53.1	6.3	70.0	54.0	66.0
7	ATT	53.0	0.6	70.0	54.0	66.0
8	ATT	53.1	3.3	70.0	55.0	67.0
9	ATT	68.7	5.6	70.0	55.0	67.0
10	ATT	66.4	7.2	70.0	54.0	66.0
11	ATT	60.3	10.6	70.0	54.0	66.0
12	ATT	57.9	11.8	70.0	55.0	67.0

4.0 WORST-CASE PREDICTIVE MODELING

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofMaster™ software to estimate the worst-case power density at the site adjacent rooftop and ground-level resulting from operation of the antennas.

For this report, EBI utilized antenna and power data provided by AT&T and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65.

The assumptions used in the modeling are based upon information provided by AT&T and information gathered from other sources. There are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled exposures on any accessible rooftop or ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

At the nearest walking/working surfaces to the AT&T antennas on the adjacent roof level, the maximum power density generated by the AT&T antennas is approximately 0.31 percent of the FCC's general public limit (0.06 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 0.31 percent of the FCC's general public limit (0.06 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna. Based on worst-case predictive modeling, there are no areas at ground/street level related to the proposed AT&T antennas that exceed the FCC's occupational or general public exposure limits at this site. At ground/street level, the maximum power density generated by the antennas is approximately 0.2 percent of the FCC's general public limit (0.04 percent of the FCC's occupational limit).

Microwave dish antennas are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage. Based on AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. All microwaves on site are considered compliant with AT&T's guidance and were not included in the modeling analysis.

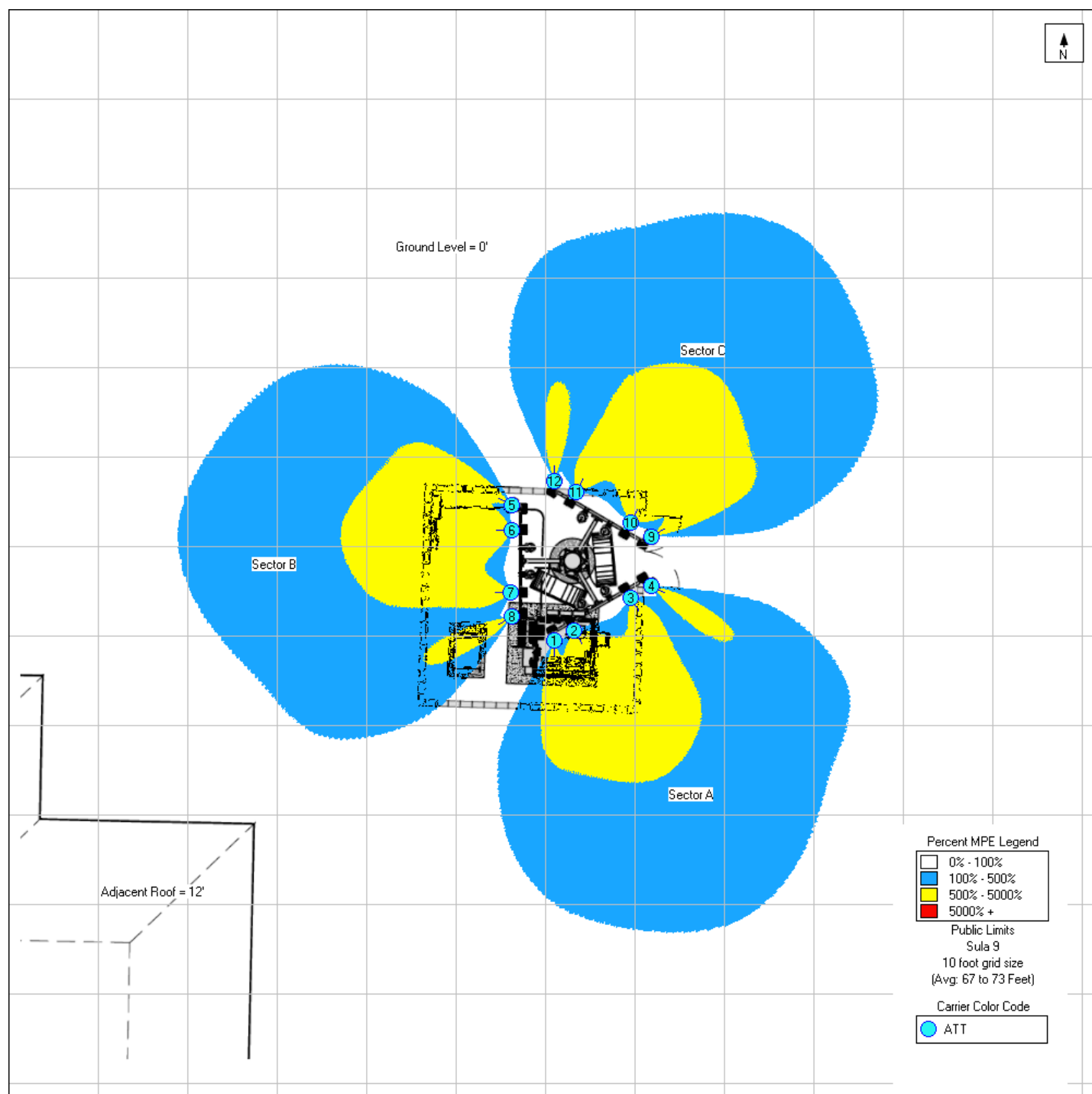
Adjacent Roof Level (12 feet AGL)



Max MPE: 0.31%
General Population
MPE at Adjacent
Roof Level

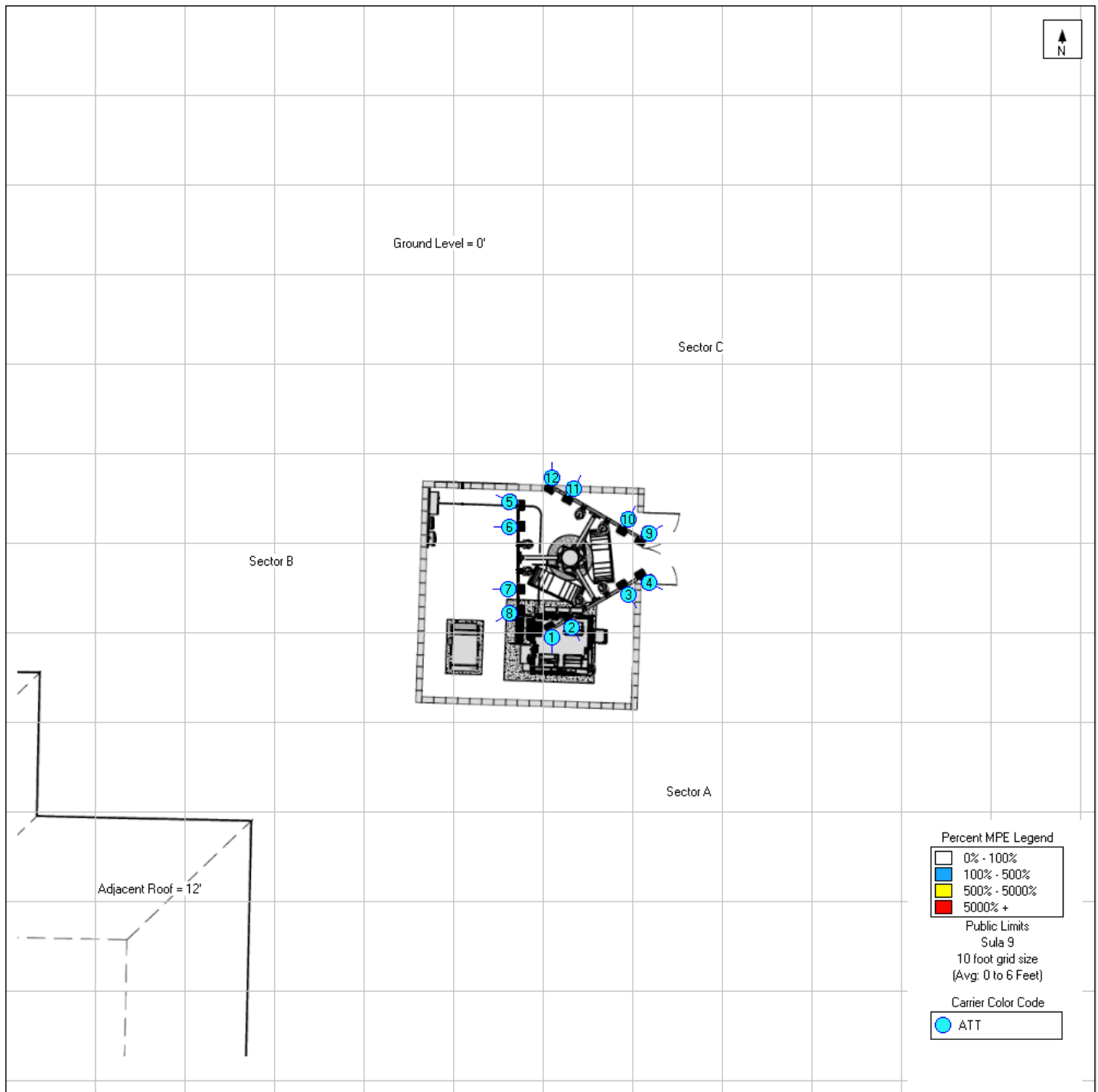
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Antenna Face Level



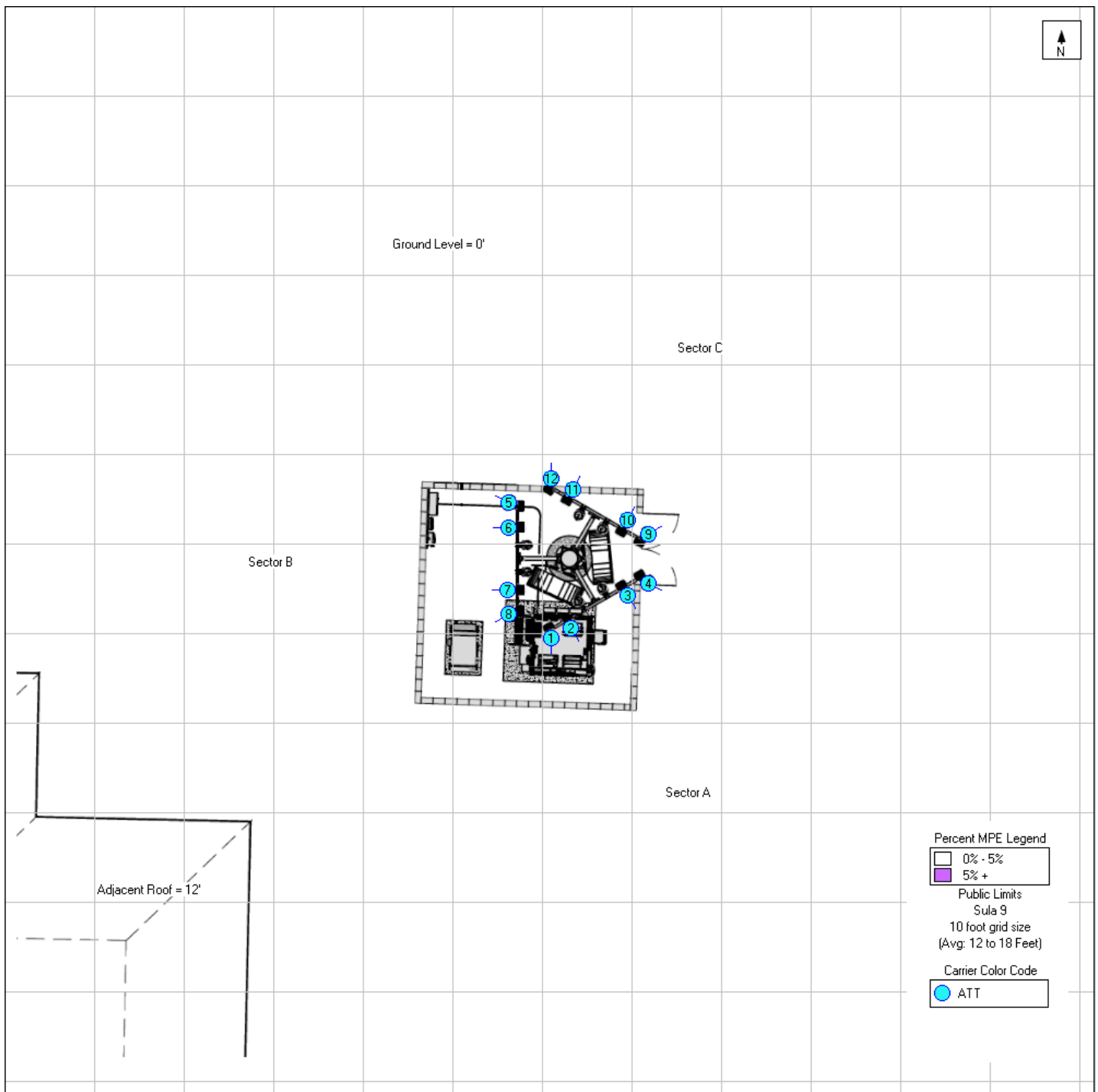
Max MPE: 3,602.14%
General Population
MPE at Antenna Face
Level

Ground Level (0 feet AGL)



Max MPE: 3.5%
General Population
MPE at Ground Level

AT&T Contribution of More Than 5% of the FCC's General Exposure RF Limit



Note that the areas shown in purple are where AT&T antennas contribute more than 5% of the FCC's general exposure RF limit. These do not overlap any areas in front of other carrier antennas exceeding the FCC's general exposure RF limit because there are no other carriers as shown in Figure 1. Under FCC regulations, AT&T is therefore not responsible for predicted exceedances of another carrier's antennas.

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5.0 COMPLIANCE SUMMARY

Based on the information collected, AT&T Mobility will be Compliant with FCC Rules and Regulations at the nearest walking surface if recommendations in the Compliance Summary are implemented.

The following mitigation measures are recommended for this site.

- **Access Point(s):**

- To reduce the risk of exposure and/or injury, EBI recommends that access to the monotree or areas associated with the active antenna installation be restricted and secured where possible.
- Yellow CAUTION 2B sign posted at the base of the monotree.

- **AT&T Mobility Sectors:**

- **Sector A:**
 - No Action Required.
- **Sector B:**
 - No Action Required.
- **Sector C:**
 - No Action Required.

6.0 APPENDICES

Appendix A: FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table I and Figure I (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm²). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm²) and an uncontrolled MPE of 1 mW/cm² for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE limit is 2.33 mW/cm² and an uncontrolled MPE limit of 0.47 mW/cm². For the AT&T equipment operating at 1900 MHz, the FCC's occupational MPE is 5.0 mW/cm² and an uncontrolled MPE limit of 1.0 mW/cm². These limits are considered protective of these populations.

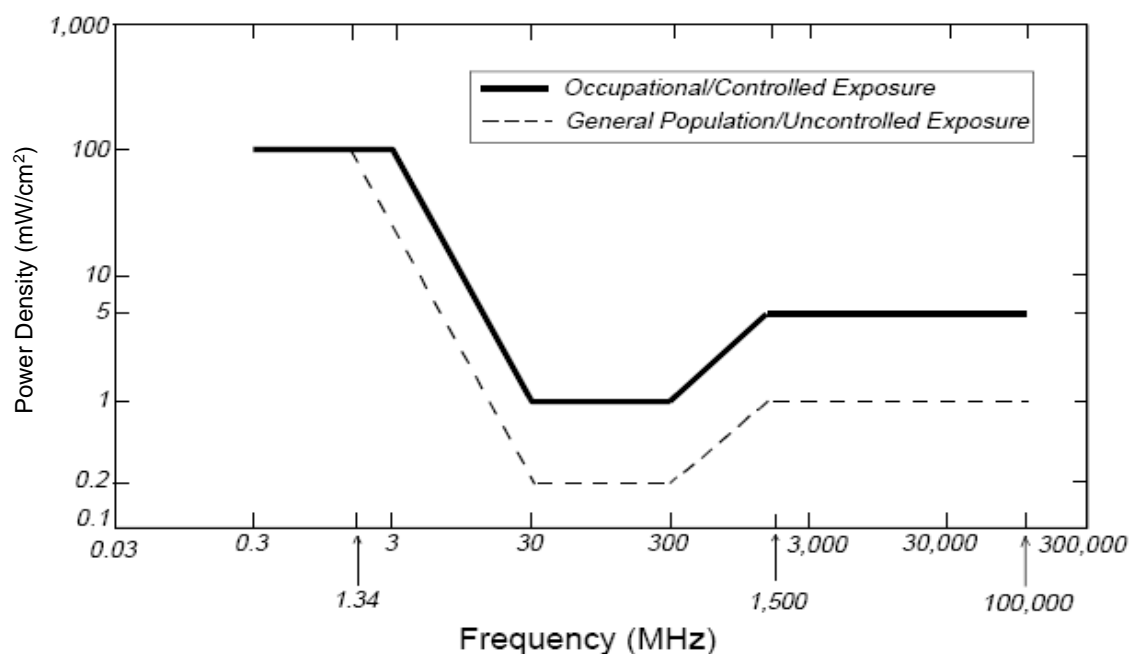
Table 1: Limits for Maximum Permissible Exposure (MPE)				
(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ²)*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Public/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f ²)*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)

* Plane-wave equivalent power density

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)

Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Microwave (Point-to-Point)	5,000 - 80,000 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Broadband Radio (BRS)	2,600 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Wireless Communication (WCS)	2,300 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Advanced Wireless (AWS)	2,100 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Cellular Telephone	870 MHz	2.90 mW/cm ²	0.58 mW/cm ²
Specialized Mobile Radio (SMR)	855 MHz	2.85 mW/cm ²	0.57 mW/cm ²
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm ²	0.47 mW/cm ²
Most Restrictive Frequency Range	30-300 MHz	1.00 mW/cm ²	0.20 mW/cm ²

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

FCC Compliance Requirement

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

Appendix B: AT&T RF EXPOSURE POLICY REQUIREMENTS

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated May 27, 2015, requires that:


1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Appendix C: AT&T SIGNAGE AND MITIGATION

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.

CRAN / HETNET Small Cell Decals / Signs		Alerting Signs	
	STONEHOUSE NOTICE DECAL		
	STONEHOUSE NOTICE SIGN		
	STONEHOUSE CAUTION DECAL		
	STONEHOUSE CAUTION SIGN		

Appendix D: LIMITATIONS

This report was prepared for the use of AT&T Mobility, LLC to meet requirements outlined in AT&T's corporate RF safety guidelines. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix E: RoofMaster™

RoofMaster™ is a widely-used predictive modeling program that has been developed to predict RF power density values for rooftop and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. Using the computational methods set forth in Federal Communications (FCC) Office of Engineering & Technology (OET) Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (OET-65), RoofMaster™ calculates predicted power density in a scalable grid based on the contributions of all RF sources characterized in the study scenario. At each grid location, the cumulative power density is expressed as a percentage of the FCC limits. Manufacturer antenna pattern data is utilized in these calculations. RoofMaster™ models consist of the Far Field model as specified in OET-65 and an implementation of the OET-65 Cylindrical Model (Sula9). The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

Appendix F: CERTIFICATIONS

Preparer Certification

I, Erik Johnson, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified “occupational” under the FCC regulations.
- I am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation.
- I have been trained in on the procedures outlined in AT&T’s RF Exposure: Responsibilities, Procedures & Guidelines document (dated October 28, 2014) and on RF-EME modeling using RoofMaster™ modeling software.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.





GENERAL BIOLOGICAL EVALUATION

AT&T SITE CSL02657
SVP WINERY
1010 TRUESDALE ROAD
SHANDON, SAN LUIS OBISPO COUNTY, CA 93461
FA #13790085

PREPARED FOR:
AT&T
5001 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

DATED: APRIL 25, 2019

PREPARED BY:
ACE ENVIRONMENTAL, LLC
9976 PEAK LOOKOUT STREET
LAS VEGAS, NEVADA 89178
WWW.ACEENVIRONMENTALLLC.COM
ACE PROJECT NO. 19-348-132-161

KIDD BIOLOGICAL, INC.

April 23, 2019

Kerry Willoughby
Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178

Subject: General Biological Evaluation for a New Telecommunication Facility (Site No. CSL02657) near Shandon, California (APN 017-251-088).

Dear Ms. Willoughby,

As requested, a general biological resources evaluation was conducted by Kidd Biological, Inc. on a proposed cellular communications project in San Luis Obispo County, California. The purpose of this report is to determine if the construction of a new cellular communications facility will result in significant impacts to biologically sensitive resources.

Project Description

AT&T proposes to construct a new cellular communications facility in order to improve service in the area. The proposed project will include the construction of a 55-foot tall faux water tank tower with associated antennas and equipment mounted in it. All equipment will be placed within an 11-5 foot by 12 foot pre-fabricated equipment shelter, all within a 48-foot by 35-foot fenced lease area. A short gravel driveway will also be installed. Power, Telco and fiber will be connected to the site via an approximately 1,530-foot underground trench to the west and north along existing roads.

Project Location

The site is located in the unincorporated area of San Luis Obispo County, California, approximately 15 miles east of Highway 101 (El Camino Real) and Paso Robles City center. Generally the site is south Highway 46, east of County Road 41 and west of Shandon San Juan Road. More specifically, the site is located in a rural residential property near the southwest corner of the intersection of Starkey Road and Truesdale Road with a site address of 1010 Truesdale Road (See Figure 1). Ecologically, the site is located in Shandon Valley, west of the Antelope Valley and the Temblor Range, south of the Cholame Hills. The site is in the Paso Robles Hills and Valleys of the Central California Foothills and Coastal Mountains ecoregion at an elevation of 1,106 feet (337 meters) above mean sea level. The project location can also be described as being located in Section 29 of Township 26 South, Range 15 East of the Shandon, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map (see figure 2).



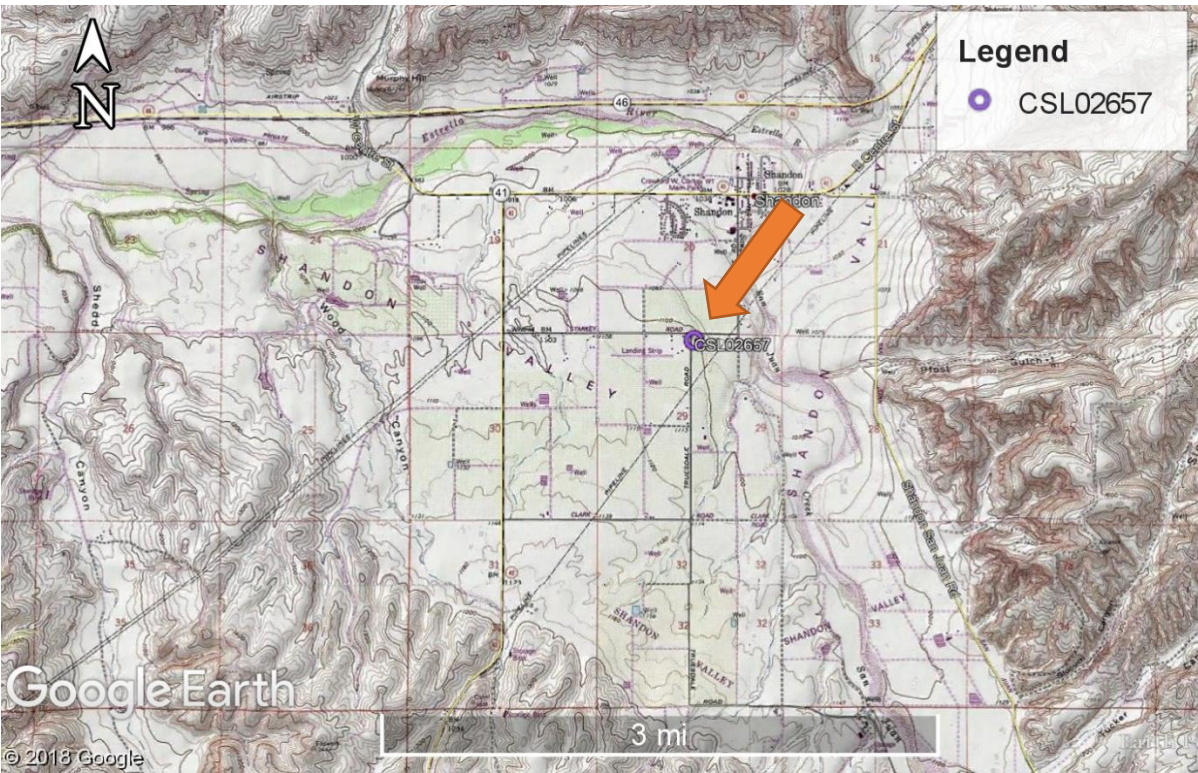
ANACORTES, WA
LAGUNA HILLS, CA

PHONE 949.632.2756
WEBSITE WWW.KIDDBIOINC.COM

FIGURE 1. AERIAL PHOTO OF SITE



FIGURE 2. TOPOGRAPHIC MAP OF SITE LOCATION



METHODS

This assessment focused on reviewing documented sensitive biological resources onsite and to use the information found in the literature review to determine the potential for these species to occur onsite. Prior to visiting the site, a literature review was done using the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database¹ and California Native Plant Society's Inventory of Rare and Endangered Plants². A report was prepared for sensitive species recorded within three miles of the project site. This information was used to help determine if any sensitive resources were previously reported on, or adjacent, to the subject property based on the existing conditions. Information from other resources such as the U.S. Fish and Wildlife service, telecommunication site plans, aerial photography and photographs provided by Ace Environmental, LLC were also reviewed.

RESULTS

The CNDDDB and other sources identified 14 sensitive species as having been previously reported within 3 miles of the project site. A discussion of the potential for these sensitive species to occur onsite is included below in Table 1 as well as in the discussion below.

The project site is located within a sparsely populated rural residential area outside of the Community of Shandon. The project footprint is approximately 30 feet to the south of a single-family residence and directly north of a vineyard. The project footprint is heavily disturbed and lacks any native habitats. The site sits at 1,106 feet above mean sea level. Surrounding land uses include rural residential and agriculture in all directions.

Sensitive Resources

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The CDFW, U.S. Fish and Wildlife Service (USFWS), and groups like the California Native Plant Society (CNPS) maintain special watch lists of such resources. After reviewing aerial photos, maps and various documents, it was determined from several criteria, which sensitive resources have a low, moderate or high potential to occur on site. Criteria used to determine potentials of occupancy include, but are not limited to, soil types and conditions, habitat types and quality, disturbance, site history, adjacent land uses and proximity to nearest known extant populations of each respective species.

¹ California Natural Diversity Database (CNDDDB). 2019. [Internet]. California Department of Fish and Wildlife Version 5.2.14. Accessed April 23, 2019

² California Native Plant Society, Rare Plant Program. 2019. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org> [accessed 23 April 2019].

TABLE 1 – Sensitive Species Occurring in the Area

Species		Status			Potential for Impact from Project Implementation
Scientific Name	Common Name	USFWS	CDFG	CNPS	
PLANTS					
<i>Caulanthus lemmonii</i>	Lemmon's jewelflower	None	None	1B.2	No Effect.
<i>Eriogonum temblorense</i>	Temblor buckwheat	None	None	1B.2	No Effect.
WILDLIFE					
<i>Anniella pulchra</i>	northern California legless lizard	None	SSC	-	No Effect. Disturbance on site precludes presence.
<i>Arizona elegans occidentalis</i>	California glossy snake	None	SSC	-	No Effect. Disturbance on site precludes presence.
<i>Buteo swainsoni</i>	Swainson's hawk	BCC	ST	-	May affect, unlikely to adversely effect.
<i>Coturnicops noveboracensis</i>	yellow rail	BCC	SC	-	No Effect. No suitable habitat in within 1,000 ft.
<i>Emys marmorata</i>	western pond turtle	None	SSC	-	No Effect. No suitable habitat in within 1,000 ft.
<i>Falco mexicanus</i>	prairie falcon	BCC	WL	-	No Effect. No suitable nest sites within 1,000 ft.
<i>Masticophis flagellum ruddocki</i>	San Joaquin coachwhip	None	SSC	-	No Effect. No suitable habitat within 1,000 ft.
<i>Onychomys torridus tularensis</i>	Tulare grasshopper mouse	None	SSC	-	No Effect. No suitable habitat.
<i>Riparia riparia</i>	bank swallow	None	ST	-	No Effect. No suitable nesting habitat within 500 ft
<i>Taxidea taxus</i>	American badger	None	SSC	-	No Effect. No suitable habitat within 1,000 ft.
<i>Vulpes macrotis mutica</i>	San Joaquin kit fox	FE	ST	-	No Effect. No suitable habitat within 1,000 ft.
U.S. Fish and Wildlife Service FT- Federal Threatened BCC- Birds of Conservation Concern California Department of Fish and Game SSC State Species of Special Concern FP- Fully Protected		California Native Plant Society Rare Plant Rankings 1B Plants rare, threatened, or endangered in California and elsewhere .2 Moderately threatened in California (20-80% occurrences threatened / moderate threat) .3 Not very threatened in California (< 20% of occurrences threatened / low threat or no current threats known)			

Impact Analysis

Of the list of 14 sensitive species having been reported in the area, only one has a potential to occur on or immediately adjacent to the site: Swainson's hawk. This species is known to historically nest in the area, with populations drastically declining in the 1970's due to pesticide use and persecution. Numbers are increasing, however nests are uncommon in the area. Swainson's hawks will nest in lone trees in agricultural areas and grasslands as well as man-made structures such as utility poles. Although it is unlikely for this species to nest on the site as there are no trees to be removed, there is a potential for this species to nest within the vicinity of the project site. To ensure there is no impacts to this species occurs during the construction phase, minimization measures are presented below.

Indirect Impacts

Temporary indirect impacts include impacts that are incurred during construction such as noise, dust, night-lighting and pollutants. After construction is complete, on-going indirect impacts include night-lighting from permanent fixtures, radio microwaves from the tower and on-going maintenance noise. Plants are generally not significantly impacted by indirect impacts. Wildlife may be negatively impacted in their behavior by noise and artificial lighting. Other species have a potential to occur adjacent to the site. These are indicated in bold in the table above. Although there is a potential for some sensitive plants and animals to occur within the area, there are no significant impacts expected to occur to these species from this project from indirect impacts.

It should be noted, however, that nesting birds may abandon nests to escape from noise or lighting. Adjacent habitats (ornamental trees and grasslands) may support nesting birds that are protected by CDFW codes and the Migratory Bird Treaty Act (MBTA).

Other considerations

No critical habitat or wildlife corridors will be impacted by this project. No drainage features, wetlands or vernal pools occur within the project footprint or immediately adjacent to the site therefore, no further studies or mitigation are necessary for Waters of the U.S. or Section 1600 of the DFG Code.

RECOMMENDATIONS

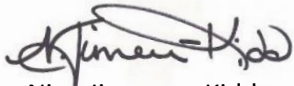
Of the list of 14 sensitive species having been reported to the CNDDDB, one wildlife species has a potential to within the project site or project's zone of influence. To ensure no direct take to sensitive species during the construction process the following is recommended:

RM1-The adjacent areas are very likely be used by nesting birds during the spring time. Due to the potential for birds to nest in the vicinity of this project site, including Swainson's hawks, if construction should occur during the bird nesting season which is generally considered February 15- September 1st, a preconstruction clearance survey of the site and the surrounding habitats within 500 feet of the site should be surveyed no more than 10 days prior to the start of construction. If an active nest is found within the project's zone of influence, avoidance measures will be recommended. Delay of the project may be recommended if impacts from construction could cause a nest failure.

If during future maintenance, the crew encounters a nest on or immediately adjacent to the project site, work should stop until a biologist can be contacted to determine the status of the nest and when the project site can be accessed without significantly impacting the nesting birds.

Should you have any questions regarding this report, please do not hesitate to contact me at (949) 632-2756.

Sincerely,

A handwritten signature in black ink, appearing to read "Nina Jimerson-Kidd", written in a cursive style.

Nina Jimerson-Kidd

Wildlife biologist

ATTACHMENT B: BIOLOGIST'S QUALIFICATIONS

Mrs. Jimerson-Kidd has over 15 years' experience in conducting herpetological, entomological, avian and botanical surveys. Her experience includes inventorying both plants and wildlife of southern and central and northwest California. She has experience in raptor trapping, handling, survey techniques, and nest monitoring, as well as some experience with mammal trapping. She also has extensive experience with small mammal identification. Mrs. Jimerson-Kidd has conducted numerous focused surveys or habitat assessments for California gnatcatcher, desert tortoise, least bell's vireo, flat-tailed horned lizard, burrowing owls, western spadefoot toad, Delhi-sands flower-loving fly, Arroyo toad, and Quino checkerspot butterfly. Additionally, her experience includes habitat assessments and focused for sensitive plants species, particularly desert species.

Education

BS, Natural Resources Planning & interpretation/ Ecology, Humboldt State University- 1998

Permits

- Federal Bird Marking sub-permit: 22951-C
- Flat-tailed Horned Lizard handling MOU (BLM)
- Scientific Collection Permit: 801128-03
- Federal 10A(1)a permit #036550-4
Coastal California Gnatcatcher
Quino Checkerspot Butterfly

Professional affiliations

- Wildlife Society
- Association of Field Ornithologists
- Raptor Research Foundation
- Society for the Study of Amphibians and Reptiles
- California Native Plant Society

Continued Education

Desert Tortoise Council Workshop 10/01
Tortoise Egg Handling and Burrow Construction Certificate 10/01
South Western Willow Flycatcher Workshop 5/01
So. Coast Missing Linkages Project Symposium 8/02
Bats of the Southwestern Desert 5/02
Burrowing Owl Symposium 10/03
California Tiger Salamander Workshop 4/13
California Manual of Vegetation CNPS workshop 1/15
Rapid Assessment/Releve Training (CNPS) 6/15

Job History

Kidd Biological, Inc. 2000- Present. Principle Biologist. Conduct Biological; assessments, focused surveys for sensitive species, project management, mitigation monitoring, restoration monitoring. On-going research of bird of prey in California.

Michael Brandman Associates. 2002- 2005. Project manager/Ecologist. Project Management, biological assessments, focused surveys, mitigation monitoring. Supervised 3-5 employees as well as sub-contractors. Assisted with Community outreach and education programs.

Humboldt State Museum of Vertebrate Zoology. 1996-1998. Assistant Curator. Managed and maintained museum specimens and catalogs, prepared new specimens, assisted researchers in locating relevant specimens from within the museum as well as locating and obtaining loans from other museums world-wide.

Humboldt County museum of Natural History. 1996-1998. Museum Assistant. Designed and created displays, managed collection, assisted with newsletter, created and taught children's classes and summer day camp, manned museum gift shop, organized and trained volunteers.

Select Professional Experience

Focused Surveys, California Gnatcatcher. Assisted in conducting a focused survey for the California gnatcatcher. The survey was conducted to determine the presence and location of any individuals or pairs of gnatcatchers within a 1000-acre parcel located in San Mateo County Park, Orange County, CA. Twenty-nine pairs of gnatcatchers were identified during the 2001 surveys. Participated in 2010 census surveys on Marine Corp Base Camp Pendleton.

Prepared an RMP for County of San Bernardino. Resource Management Plan was prepared for 13,000 acres in the Mojave Desert. During the surveys of the lands, numerous desert tortoise and burrowing owls as well as other sensitive species were observed. The plan focused on the minimizing efforts of a low-density housing project on sensitive species in the Mojave Desert. (2003)

Burrowing Owl Relocation. Coordinated with CDFG and USFWS to actively translocate one pair of burrowing owls from a project site in the City of Fontana to a conservation site on U.S. Naval Station, Seal Beach. Assisted in the trapping and release efforts as well as monitoring of the site during grading.

Assist in on-going Burrowing Owl research. Assists annually in capturing and banding of juvenile burrowing owls on a conservation site on U.S. Naval Station Seal Beach. Data is used to calculate nest success rates, particularly of translocated birds.

Managed biological studies for proposed wind turbine project. Managed 10 biologists and conducted migratory bird surveys, plant surveys and desert tortoise surveys for a 7 square mile proposed wind farm in the Mojave Desert. 2004-2005

Construction monitoring. Has monitored grading and other construction activity on numerous projects including cellular communications towers, military training facilities, County road maintenance, linear fiber-optics lines, park trails, large housing developments, and restoration activities. Species monitored include California gnatcatcher, least Bell's vireo, arroyo toad, desert tortoise, burrowing owl, nesting birds, flat-tailed horned lizard, and general wildlife.

Focused Surveys, Arroyo Toad. Conducted presence/absence surveys as well as pit-fall trapping in Camp Pendleton USMCB and San Mateo County Park in San Diego County, CA. Over 1000 Arroyo Toads were detected as well as egg strands, tadpoles and metamorphs during the 2001 surveys. Since then numerous surveys have been conducted for the toad in San Diego and Orange Counties.

Consultation with CDFG. Successfully completed 2081 permit applications for take of desert tortoise on a project in the Mojave Desert as well as a take permit for Mohave ground Squirrel in Victorville. 2003-2005.

Quino Checkerspot butterfly Surveys. Over the past decade, approximately 12 sites have been surveyed for the endangered butterfly. Survey areas included Northwestern Riverside County to southeastern San Diego County. Two power line projects were part of these surveys and required extensive area surveys. Additional surveys have been conducted for the BLM and the U.S. Forest Service for fire maintenance. In 2010, QCB were observed near Mount Palomar.



KIT FOX HABITAT ASSESSMENT

AT&T SITE CSL02657
SVP WINERY
1010 TRUESDALE ROAD
SHANDON, SAN LUIS OBISPO COUNTY, CA 93461
FA #13790085

PREPARED FOR:
AT&T
5001 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

DATED: JUNE 3, 2019

PREPARED BY:
ACE ENVIRONMENTAL, LLC
9976 PEAK LOOKOUT STREET
LAS VEGAS, NEVADA 89178
WWW.ACEENVIRONMENTALLLC.COM
ACE PROJECT NO. 19-348-132-161

KIDD BIOLOGICAL, INC.

May 31, 2019

Kerry Willoughby
Ace Environmental, LLC
9976 Peak Lookout Street
Las Vegas, NV 89178

Subject: Habitat Assessment for the San Joaquin Kit Fox at a Proposed Tele-communication Facility (Site No. CSL02657) near Shandon, California (APN 017-251-088).

Dear Ms. Willoughby,

As requested, a general biological resources evaluation was conducted by Kidd Biological, Inc. on a proposed cellular communications project in San Luis Obispo County, California. Due to the possible presence of the San Joaquin kit fox (*Vulpes macrotis mutica*; kit fox), a specific assessment was conducted for the potential for this species to occur on the proposed project site. The purpose of this report is to determine if the construction of a new cellular communications facility will result in the loss of suitable habitat or impacts to the kit fox.

Project Description

AT&T proposes to construct a new cellular communications facility in order to improve service in the area. The proposed project will include the construction of a 55-foot tall faux water tank tower with associated antennas and equipment mounted in it. All equipment will be placed within an 11-5 foot by 12 foot pre-fabricated equipment shelter, all within a 48-foot by 35-foot fenced lease area. A short gravel driveway will also be installed. Power, Telco and fiber will be connected to the site via an approximately 1,530-foot underground trench to the west and north along existing roads.

Project Location

The site is located in the unincorporated area of San Luis Obispo County, California, approximately 15 miles east of Highway 101 (El Camino Real) and Paso Robles City center. Generally the site is south Highway 46, east of County Road 41 and west of Shandon San Juan Road. More specifically, the site is located in a rural residential property near the southwest corner of the intersection of Starkey Road and Truesdale Road with a site address of 1010 Truesdale Road (See Figure 1). Ecologically, the site is located in Shandon Valley, west of the Antelope Valley and the Temblor Range, south of the Cholame Hills. The site is in the Paso Robles Hills and Valleys of the Central California Foothills and Coastal Mountains ecoregion at an elevation of 1,106 feet (337 meters) above mean sea level. The project location can also be described as being located in Section 29 of Township 26 South, Range 15 East of the Shandon, California U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map (see figure 2).

	ANACORTES, WA LAGUNA HILLS, CA	PHONE 949.632.2756 WEBSITE WWW.KIDDBIOINC.COM
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FIGURE 1. AERIAL PHOTO OF SITE

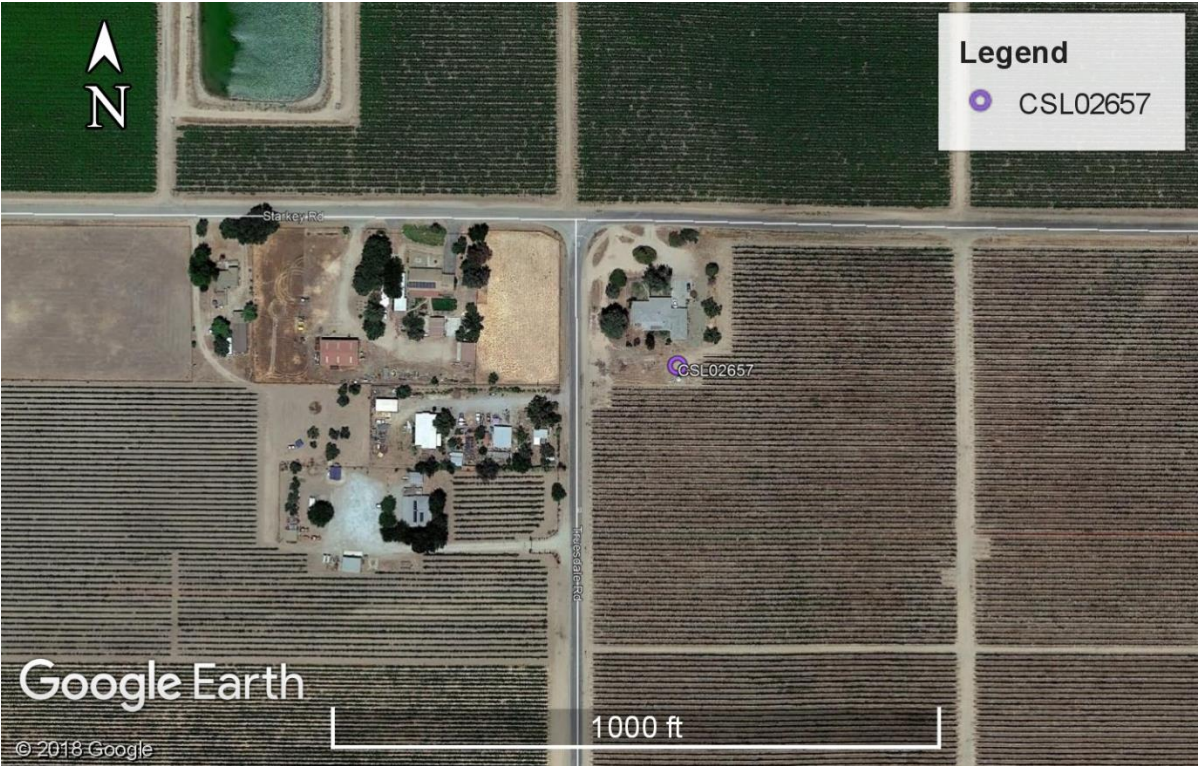
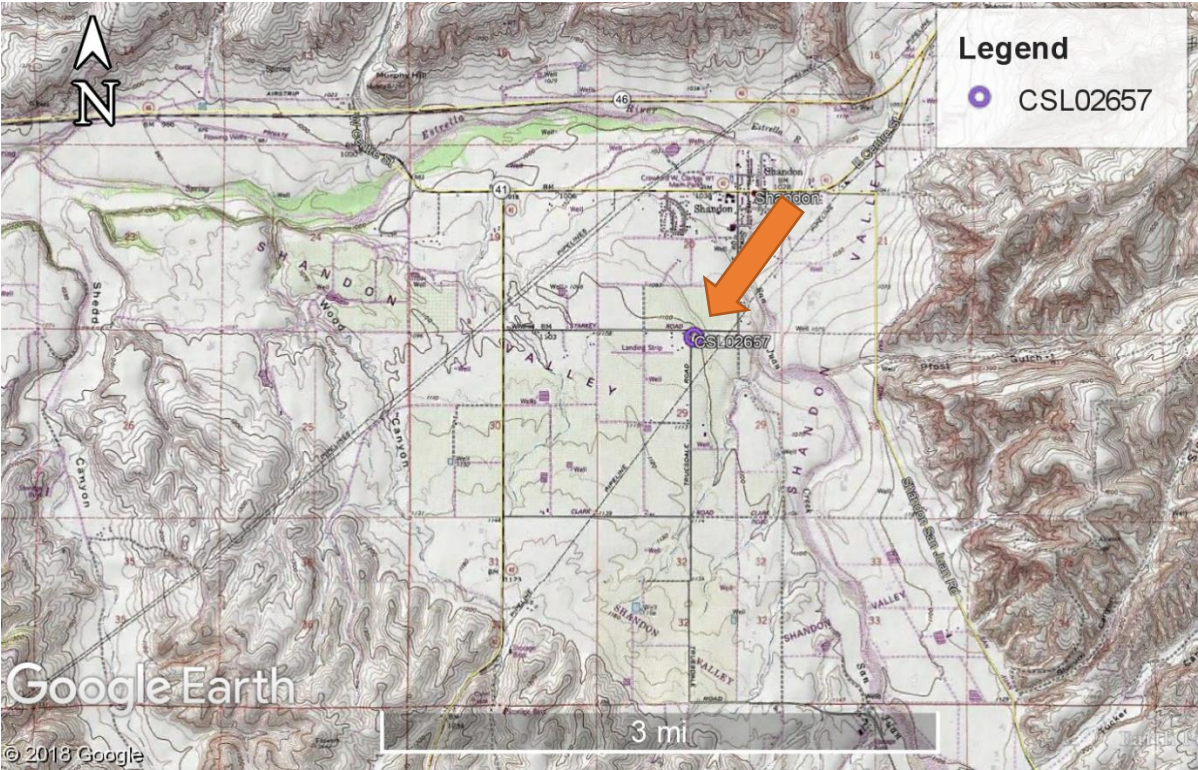


FIGURE 2. TOPOGRAPHIC MAP OF SITE LOCATION



METHODS

This assessment focused on reviewing documented kit fox natural history, current and historic ranges and observation within 10 miles of the site. Prior to visiting the site, a literature review was done using the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database¹ and County of San Luis Obispo County Planning Department kit fox-related documents². A report was prepared for sensitive species recorded within three miles of the project site. This information was used to help determine if any sensitive resources were previously reported on, or adjacent, to the subject property based on the existing conditions. Information from other resources such as the U.S. Fish and Wildlife service, telecommunication site plans, and aerial photography were also reviewed.

Following the literature review an assessment of the site was conducted by Wendy Knight and William J. Vanherweg on May 10th, 2019. This assessment was specifically to evaluate the site's suitability to support the San Joaquin Kit Fox (*Vulpes macrotis mutica*), per County of San Luis Obispo requirements. A "Kit Fox Habitat Evaluation Form" was filled out as part of the evaluation and can be found in [Attachment A](#).

Natural History of the San Joaquin Kit Fox

The San Joaquin kit fox is a subspecies of the kit fox (*Vulpes macrotis*) whose range is limited to the San Joaquin Valley and surrounding areas including the Coast Ranges, and Tehachapi Mountains. Their choice of habitat is quite diverse and opportunistic. Their primary and historic habitat is comprised of rolling grasslands, valley oak savanna. Presently they have been found using areas of mixed agriculture with row crops, pastures, orchards, vineyards and grazed grasslands³.

A primary habitat requirement are burrows and soils suitable for burrowing. This fox often modifies existing burrows dug by other burrowing mammals such as California ground squirrels (*Ottospermophilus beecheyi*) and rabbits (*Sylvilagus audubonii*) and black-tailed jackrabbits (*Lepus californicus*). These burrows are occupied year-round. The kit fox preys opportunistically on mice, ground squirrels, mice, ground-nesting birds and even reptiles and insects.

Natal and pupping dens are only in use between September and April. Females occupy larger pupping dens between September and October. Pair formation typically occurs from October to late December, and mating occurs typically in December to early January. The gestation period lasts approximately 55 days. Pups are born between February and late March. SJKF produces only one litter per year. Pups emerge from the den after one month, and are weaned. However, adults continue to provide food and care until the pups reach approximately 4 to 5 months old, at which time they disperse to smaller year-round use dens.

Loss, fragmentation, and degradation of habitat due to agriculture and urbanization have reduced the available habitat for the kit fox. This can cause isolation of populations, reducing the health and viability

¹ California Natural Diversity Database (CNDDB). 2019. [Internet]. California Department of Fish and Wildlife Version 5.2.14. Accessed April 23, 2019

² County of San Luis Obispo Planning Department <https://www.slocounty.ca.gov/getattachment/2c0fc293-eb37-4a0c-af22-5e0992efd025/Kit-Fox-Habitat-Area.aspx>

³ U.S. Fish and Wildlife Service (USFWS). 1998. Recovery plan for upland species of the San Joaquin Valley, California, Region 1, Portland Oregon. 295 pp

of these separated populations. Vehicle strikes, rodenticide and predation also cause high mortality in the species.

RESULTS

On Site Habitat

The project site is located within a sparsely populated rural residential area outside of the Community of Shandon. The project footprint is approximately 30 feet to the south of a single-family residence and directly north of a vineyard. The project footprint is heavily disturbed and lacks any native habitats (Attachment B- Site Photos). The site sits at 1,106 feet above mean sea level. Surrounding land uses include rural residential and agriculture in all directions. The majority of the agriculture in the area is vineyards with some grain crops interspersed. There are also fallow fields as well in the area.

Suitability of the Habitat for Kit Fox

Soils

Soils on site are mapped as Hanford and Greenfield gravelly sandy loams⁴. The soils on site are suitable for burrowing, however they did not appear to have the clay element which is thought to be preferred by the kit fox which stabilizes the burrow complexes.

Prey Availability

Numerous small mammal burrows (likely gopher and pocket mice) were observed within the project footprint and adjacent areas. No squirrel burrows were observed within the immediate area. The presences of vineyard makes the use of rodenticides and other rodent prevention methods likely, but none were seen on the project site.

Den Availability

No burrows were observed within the project footprint or the immediate area. Scent station surveys indicate that kit fox are in the area, however they seem to be concentrated to the north of the site in the grasslands associated with Cholame Hills

Predators

No predators were observed in the area other than domestic dogs, however it is likely that coyotes and raptors are abundant in the area, however not necessarily any more abundant than other areas of the region.

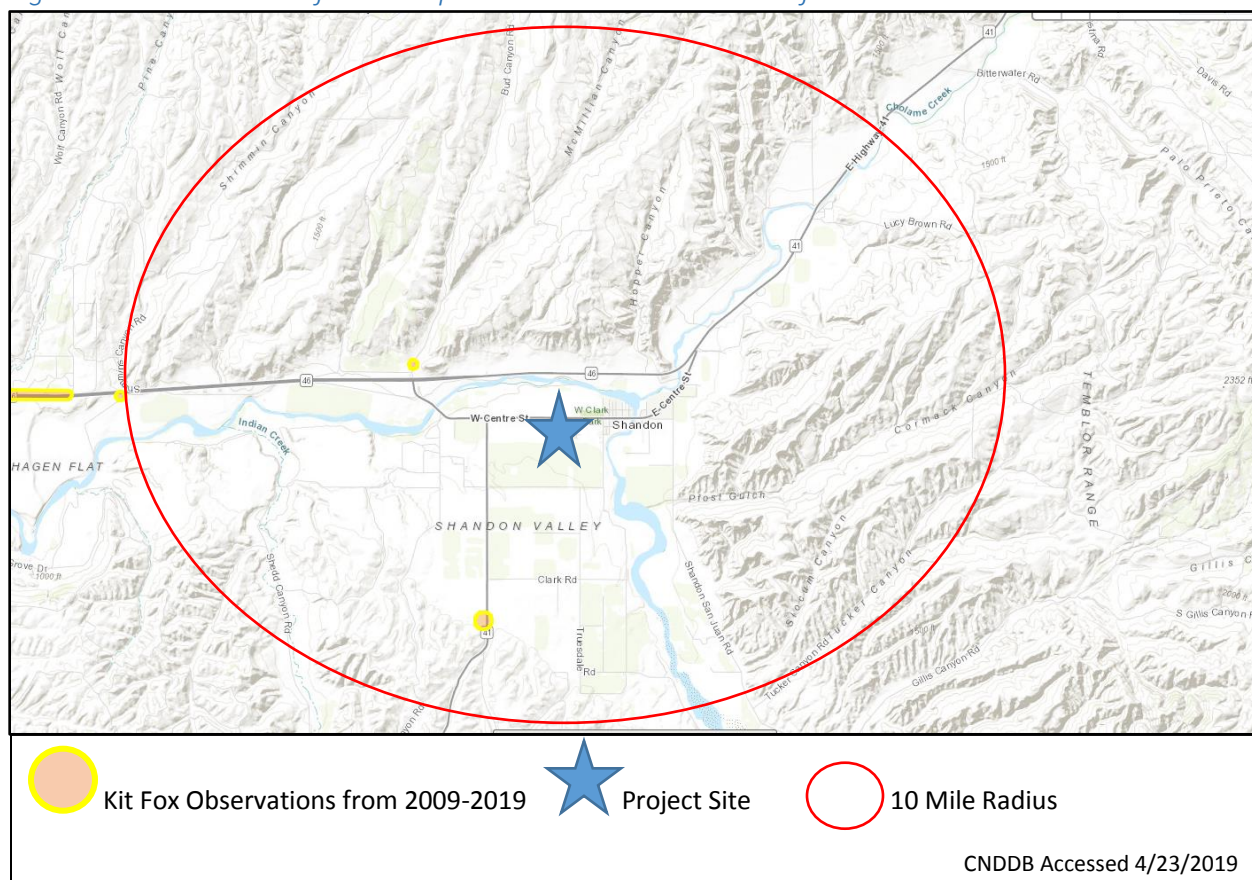
San Joaquin Kit Fox Occurrences within 10 Miles

Although kit fox observations are not dense in the area, there are recent documented observances of the species in the vicinity of the site (Figure 3). The closest observance was in

⁴ Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Web Soil Survey. Available online at the following link: <https://websoilsurvey.sc.egov.usda.gov/>. Accessed 05/05/2019

2014, 2.3 miles to the northwest of the site. This observation was taken from scat collected at a scent station. The biologist noted that red fox were also present at the site that was being used for barley farming at the time. Another observation 1.75 miles to the south was from 2012. This observation was of a single adult observed in an annual grassland surrounded by agriculture.

Figure 3. Observations of San Joaquin Kit Fox within 10 miles of the Site



Habitat Corridors

The project site and immediately surrounding areas are comprised of a mosaic of agriculture (primarily vineyards) and vacant parcels of ruderal grasslands. There are large areas of less disturbed annual grassland habitat within 1-2 miles in all directions of the proposed project site. The agricultural lands in the Shandon Valley likely act as a corridor between these larger areas of more suitable habitat.

San Luis Obispo County Requirements

The county has specific requirements to mitigate for the loss of habitat for this species. Per their Environmental Review Website: "If your project occurs within the kit fox habitat area and the parcel is less than 40 acres in size, you may elect to accept the standard mitigation ratio for the area, which is based

on the results of previous kit fox habitat evaluations and recent kit fox sightings. If your project occurs within the kit fox habitat area, and the parcel is 40 acres or more in size, a kit fox habitat evaluation must be conducted by a qualified kit fox biologist, based on the County's kit fox survey protocol.” In addition to the mitigation fee that is calculated using the Evaluation Form (Attachment B), standard conditions are included on building and grading plans located within the kit fox habitat area. According to the County website, the project site falls in an area slated as 4:1 mitigation ratio and is within 1 mile of a kit fox sighting in the past 10 years. It is unclear if the evaluation form mitigation rate or the standard mitigation rate for projects under 10 acre will be more cost effective without further consultation with the County's planning department.

The County of San Luis Obispo uses \$2,500/acre cost for the standard mitigation ratio. As this project is under 1 acre we assume the mitigation costs will be \$2,500 or less. The Evaluation Form resulted in a score of 46 ([Attachment 1](#)). In discussing the matter with the County's representative (Holly Phipps, personal communication May 30, 2019) it appears that anything with a rating lower than 50 may be given a lower mitigation fee, but the evaluation form will be reviewed by the California Department of Fish and Wildlife to determine concurrence and the mitigation ratio. For the sake of saving time, it may be more cost effective for AT&T to elect to pay the Standard Mitigation Fee. The form which must be submitted for this can be found [HERE](#).

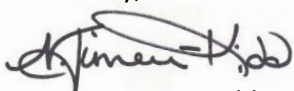
RECOMMENDATIONS

It is recommended that they proponent consult with the County Planning Department to determine if submitting the Kit Fox Habitat Evaluation Form/consulting with CDFW is more cost effective than paying the Standard Fee.

It should be noted that the conditions on the permit will also include avoidance and minimization measures for kit fox. These include, but are not limited to, limits on construction times, maintaining speed limits, conducting a pre-construction clearance survey, and removing all food items from site. A complete list of these avoidance measures can be found [HERE](#).

Should you have any questions regarding this report, please do not hesitate to contact me at (949) 632-2756.

Sincerely,

A handwritten signature in black ink, appearing to read "Nina Jimerson-Kidd", is written over a light blue rectangular background.

Nina Jimerson-Kidd
Wildlife biologist

ATTACHMENT A: KIT FOX EVALUATION FORM

Kit Fox Habitat Evaluation Form

[\(guidelines\)](#)

Cover Sheet

Project Name Proposed Shandon Communications Tower

Date 05/10/2019

Project

Location* 1 mile Southwest of Shandon, CA.

*Include project vicinity map and project boundary on copy of U.S.G.S. 7.5 minute map (size may be reduced)

U.S.G.S. Quad Map Name

Shandon Quadrangle

Lat/Long or UTM coordinates (if available)

35 degrees 38' 38" N, 120 degrees 22' 54" W

Project Description:

Project Size 0.06 Acres Amount of Kit Fox Habitat Affected 0.06 Acres

Quantity of WHR Habitat Types Impacted (i.e. - 2 acres annual grassland, 3 acres blue oak woodland)

WHR type Vineyard 0.06 Acres

WHR type _____ Acres

WHR type _____ Acres

WHR type _____ Acres

Comments: Tower site is adjacent to a rural residence and a tank and water well site.

Form Completed By: **William J. Vanherweg**

Rev 3/02
G:envdiv/forms/kit fox
habitat

San Joaquin Kit Fox Habitat Evaluation form

Is the project area within 10 miles of a recorded San Joaquin kit fox observation or within contiguous suitable habitat as defined in question 2 (A-E)

Yes - Continue with evaluation form

☒ No Evaluation form/surveys are not necessary

1. Importance of the project area relative to Recovery Plan for Upland Species of the San Joaquin Valley, California (Williams et al., 1998)
 - A. Project would block or degrade an existing corridor linking core populations or isolate a subpopulation (20)
 - B. Project is within core population (15)
 - C. Project area is identified within satellite populations (12)
 - ☒ D. Project area is within a corridor linking satellite populations (10)
 - E. Project area is not within any of the previously described areas but is within known kit fox range (5)
2. Habitat characteristics of project area.
 - A. Annual grassland or saltbush scrub present >50% of site (15)
 - B. Grassland or saltbush scrub present but comprises <50% of project area (10)
 - C. Oak savannah present on >50% of site (8)
 - D. Fallow ag fields or grain/alfalfa crops (7)
 - ☒ E. Orchards/vineyards (5)
 - F. Intensively maintained row crops or suitable vegetation absent (0)
3. Isolation of project area.
 - A. Project area surrounded by contiguous kit fox habitat as described in Question 2a-e (15)
 - ☒ B. Project area adjacent to at least 40 acres of contiguous habitat or part of an existing corridor (10)
 - C. Project area adjacent to <40 acres of habitat but linked by existing corridor (i.e., river, canal, aqueduct) (7)
 - D. Project area surrounded by ag but less than 200 yards from habitat (5)
 - E. Project area completely isolated by row crops or development and is greater than 200 yards from potential habitat (0)
4. Potential for increased mortality as a result of project implementation. Mortality may come from direct (e.g., - construction related) or indirect (e.g., - vehicle strikes due to increases in post development traffic) sources.
 - A. Increased mortality likely (10)
 - B. Unknown mortality effects (5)
 - ☒ C. No long term effect on mortality (0)

Revised 03-02

5. Amount of potential kit fox habitat affected.
 - A. >320 acres (10)
 - B. 160 - 319 acres (7)
 - C. 80 - 159 acres (5)
 - D. 40 - 79 acres (3)
 - ☒ E. < 40 acres (1)
6. Results of project implementation.
 - A. Project site will be permanently converted and will no longer support foxes (10)
 - ☒ B. Project area will be temporarily impacted but will require periodic disturbance for ongoing maintenance (7)
 - C. Project area will be temporarily impacted and no maintenance necessary (5)
 - D. Project will result in changes to agricultural crops (2)
 - E. No habitat impacts (0)
7. Project Shape
 - A. Large Block (10)
 - B. Linear with > 40 foot right-of-way (5)
 - ☒ C. Linear with < 40 foot right-of-way (3)
8. Have San Joaquin kit foxes been observed within 3 miles of the project area within the last 10 years?
 - ☒ A. Yes (10)
 - B. No (0)

Scoring

1.	Recovery importance	<u>10</u>
2.	Habitat condition	<u>5</u>
3.	Isolation	<u>10</u>
4.	Mortality	<u>0</u>
5.	Quantity of habitat impacted	<u>1</u>
6.	Project results	<u>7</u>
7.	Project shape	<u>3</u>
8.	Recent observations	<u>10</u>

TOTAL 46

Revised 03/02-lpd

ATTACHMENT B: SITE PHOTOS



1. Looking East from Truesdale Road at project site



2. Looking South at Vineyards



3. Looking north at project footprint.



4. Looking west at project footprint.



Photo 5. Looking East from the intersection of Truesdale Road and Starkey Road at proposed utility easement

ATTACHMENT C: BIOLOGIST'S QUALIFICATIONS

RESUME

William J. Vanherweg

Certified Wildlife Biologist

Email- bvan53@gmail.com

(805) 839-0375

- Biological Surveys - Impact Analysis - Regulatory Agency Consultation
-Mitigation Design - Habitat Management & Conservation Planning

Recent Solar Energy

Construction Experience

Panoche Valley Solar Project Designated Biologist *

Maricopa West Solar Project Designated Biologist *

Barren Ridge 1 Cinco Solar Resource Monitor

Topaz Solar Farm Designated Biologist *

PROFESSIONAL HISTORY

1993-Present

Senior Biological Consultant

Self-employed

1991-1993

Senior Biologist/Regional

Manager BioSystems Analysis, Inc.

1990-1991

Wildlife Biologist/Botanist

QUAD Consultants

1977-1990

Agronomist

Self-employed

1971-1977

Range/Biological Technician

Bureau of Land Management

1974-1974

Biological Technician

California Department of Fish and Game

EDUCATION

Bachelor's Degree

Range Wildlife Ecology, 1975

California State University, Chico &
Humboldt State University

As a Certified Biologist Mr. Vanherweg is responsible for wildlife and botanical surveys, environmental project coordination, including study design and implementation, impact analysis, mitigation design, technical report preparation, and resource agency consultation for a variety of projects. William specializes in working with endangered species issues as they relate to CEQA/NEPA compliance and has extensive experience with over 20 sensitive species. He is well known for his responsible biological analysis, effective mitigation design, and has always found a way to be fair to both his client and the species of concern.

His project experience includes being the biological lead on over 120 urban and industrial developments, including the licensing of five southern California power plants, supervising biological survey and monitoring crews for two interstate pipeline projects, and managing sensitive wildlife resources on the 20,000 acre Kern Water Bank/Endangered Species Compatible Habitat Reserve. His years of consulting with public agencies such as the California Energy Commission, California Department of Fish and Game, Bureau of Land Management, U.S. Forest Service, Department of Energy, Department of Defense, U.S. Fish and Wildlife Service, and U.S. Army Corps of Engineers have been invaluable to his professional growth and have given him the insights necessary to solve small problems before they become large ones. This ability has gained him the respect of his clients, colleagues, and the many agency representatives he has worked with during his career.

**PERMITS AND
MEMORANDA OF
UNDERSTANDING**

State of California **Scientific Collectors Permit**

Federal Permit (TE787644-7) to live-trap endangered:

Tipton/Fresno kangaroo rats

Giant kangaroo rats

Morro Bay kangaroo rats

San Joaquin kit fox

State **Memorandum of Understanding** to live-trap:

Tipton/Fresno kangaroo rats

Giant kangaroo rats

Morro Bay kangaroo rats

San Joaquin kit fox

Mojave ground squirrels

San Joaquin Antelope Squirrel

Authorized to handle **desert tortoise**, (threatened species)

**SPECIALIZED
TRAINING**

Endangered Species Workshop, 1990; Taft, California

Mojave Ground Squirrel Human Impact Habitat Evaluation Seminar, 1991;
Barstow, California

Habitat Conservation Planning Seminar, 1994; Sacramento, California

Emergency **First Aid/CPR**, 1994, Paso Robles, California

Fairy Shrimp Identification, 1995; Bakersfield, California

Great Basin Wildlife Habitats Seminar 1995; North Lake Tahoe, Nevada

San Joaquin Kit Fox Handling and Radio Collaring Training, Enterprise Advisory
Services, Inc. 1997.

Conservation Dog Handler Certification, 2004.

**PROFESSIONAL
AFFILIATIONS**

Former Bureau of Land Management **Central California Resource Advisory
Council Member** (*appointed by the Secretary of the Interior*)

Research Associate **San Joaquin Valley Endangered Species Recovery Program**

San Joaquin Chapter of **The Wildlife Society**

California Native Plants Society

American Society of Mammalogists

WENDY KNIGHT

Pacific Coast Ecology

PERMITS

USFWS Recovery Permit for California tiger salamander and California red-legged frog
CDFW Scientific Collecting Permit

EDUCATION

Bachelors Degree, Biology, Colorado College, Colorado Springs, Colorado. 1996.

RELEVANT WORK EXPERIENCE

ICF International, Sacramento, California January 2015-present

- Designated Biologist for California tiger salamander and California red-legged frog for Hwy 25 Curve Replacement Project, San Benito County, California. CalTrans Region 6
- Designated Biologist for California tiger salamander and California red-legged frog for Hwy 246. Road Improvement Project between Lompoc and Buellton, Santa Barbara County, California. CalTrans Region 5

Kern Environmental Education Program, Cambria and Los Osos, California Oct2014-May 2017
Substitute naturalist for Outdoor School Program.

- Lead environmental education experiences to small and large groups of students in indoor and outdoor settings on site, trail hikes and field trips.
- Supervise students in recreational and other activities associated with an overnight camp.

Pacific Coast Ecology, San Luis Obispo, California January 2011-present

Biologist

- Prepared Biological Resource Assessments for Cannabis Operations Applications, Santa Barbara County, CA 2018-present
- Aquatic surveys for CTS larvae, Lompoc, CA. Spring 2017, 2018, 2019.
- Designated CTS and CRLF biologist for California Flats Solar Ranch Project, Shandon, CA. January - March 2016
- Prepared Biological Assessment for Pismo Beach Bluff Restoration Project, Pismo Beach, CA. March 2015
- Scoped and excavated small mammal burrows for California tiger salamander, relocated CRLF adults and tadpoles out of project area, monitored construction activities to ensure compliance with Incidental Take Permit and Biological Opinion. Black Road Bridge Replacement Project, Santa Maria, CA. May – December 2014
- Conducted fall and winter 2013 spotlight surveys for kit fox with CDFW, Carrizo Plain, CA.
- Scoped and excavated small mammal burrows for California tiger salamander, Union Valley Parkway, Santa Maria, CA
- Conducted pre-construction nesting bird survey for cellular tower and wood pole replacement sites, San Luis Obispo and Santa Barbara Counties, CA. Ongoing.
- Conducted pre-construction surveys for California red-legged frog (CRLF) and San Francisco dusky footed woodrat, San Francisco Public Utility Commission (SFPUC) Crystal Springs/San Andreas Reservoir Pipeline Improvement Project, San Mateo County, CA
- Relocated CRLF egg mass and adults and conducted bullfrog control, SFPUC Lower Crystal Springs Dam Improvement Project, San Mateo County, CA

- Conducted acoustic monitoring and visual surveys for bat species, Mandalay and Edison Bridges, Oxnard, CA and Santa Ana River Bridge Seismic Retrofit and Routine Maintenance Project, Riverside, CA
- Conducted acoustic monitoring and visual surveys for bat species, SFPUC, Crystal Springs/San Andreas Reservoir Pipeline Improvement Project and Harry Tracy Water Treatment Plant Projects, San Mateo County, CA
- Conducted acoustic monitoring and visual surveys for bat species, Arup/PB Joint Venture Presidio Parkway/Doyle Drive Replacement Project, San Francisco, CA
- Surveyed pipeline ROW for rare plants and exotic plants, SFPUC, Crystal Springs/San Andreas Reservoir Pipeline Improvement Project, San Mateo County, CA
- Monitored construction activities and relocated CRLF from project site, DaSilva Gates Construction, Hwy 1/Salinas Road Interchange Project, Watsonville, CA.

HT Harvey & Associates, San Luis Obispo, California February 2012-October 2014

- Conducted nesting bird surveys, San Mateo and Santa Clara Counties, CA
- Conducted one-way door checks for burrowing owl exclusion and nesting bird surveys and deterrence. California Valley Solar Ranch Project, Carrizo Plain, San Luis Obispo County
- Conducted weekly avian fatality searches in active solar arrays, California Valley Solar Ranch Project, Carrizo Plain, San Luis Obispo County, CA

Terra Verde Environmental Consultants, San Luis Obispo, California Feb 2012-July 2012

- Conducted daily nesting bird surveys for the PG&E San Luis Obispo to Atascadero Reconductoring Project, San Luis Obispo County.
- Conducted pre-construction CRLF surveys and monitored clearing of riparian vegetation for impacts to CRLF, Diablo Creek, San Luis Obispo County.
- Conducted CRLF survey in Reservoir Canyon, San Luis Obispo CA.
- Conducted bat surveys using Wildlife Acoustic ultrasonic detector and Sonobat software, Reservoir Canyon, San Luis Obispo CA .

Rincon Consultants, San Luis Obispo, California

August 2005-

June 2009

Biologist

- Conducted CRLF protocol surveys in San Luis Obispo and Santa Barbara Counties. Including Santa Margarita Ranch, Picachio Creek, and Santa Maria area.
- Conducted California tiger salamander protocol surveys, Las Flores Ranch and Union Valley Parkway Projects, Santa Maria, CA.
- Inventoried bat species using acoustic monitoring, More Mesa, Santa Barbara County.
- Monitored revegetation project in San Luis Obispo, CA and prepared the annual report to document compliance with Army Corps of Engineers mitigation requirements. Davenport Creek Project Annual Mitigation Monitoring Report: Year 5. November 2007. Client: Weyrich Development Company, Inc.

Morro Group, San Luis Obispo, California

April 2004-

March 2005

Biologist

- Monitored and relocated individuals of Morro Bay blue butterfly, Broderson and Tri-W Sites, Los Osos, California.
- Conducted protocol habitat assessments for California tiger salamander, Santa Maria, CA.
- Conducted protocol surveys for California red-legged frogs.

- ❑ Conducted protocol surveys for Morro shoulderband snail, Camp San Luis Obispo and Morro Bay Power Plant, San Luis Obispo County, CA.
- ❑ Conducted habitat assessments and surveys for monarch butterfly, Nipomo, CA.
- ❑ Prepared the Biological Assessments and Natural Environmental Study Reports for Caltrans for bridge replacement projects over the following creeks; Picachio Creek, Leffingwell Creek, and Santa Rosa Creek, San Luis Obispo County, CA.

Stanford University, Center for Conservation Biology, Palo Alto, California
1996-2000

1996-

Research Assistant in the Department of Biological Sciences

- ❑ Sampled CTS larvae to determine population distribution, size and developmental stage.
- ❑ Monitored roadways and drift fences for California tiger salamander adults (until 2004).
- ❑ Prepared annual reports on California tiger salamander monitoring.
- ❑ Surveyed riparian areas for California red-legged frogs and conducted bullfrog control.
- ❑ Conducted plant surveys to determine the degree of spatial aggregation and temporal variation in Bay checkerspot butterfly hostplants.
- ❑ Conducted Bay checkerspot butterfly larval surveys and assisted with various research projects involving adult butterflies.
- ❑ Supervised undergraduate field crews.
- ❑ Surveyed for Myrtle's silverspot butterfly, Point Reyes National Seashore, CA
- ❑ Sampled native bee diversity and abundance on organic and conventional farms, Davis, CA
- ❑ Studied bat diversity in clearcuts and forest of various successional stages using Anabat II. Trapped and identified bat species using mist nets and harp traps. Campeche, Mexico

RECENT WORKSHOPS ATTENDED

Declining Aquatic and Semi-Aquatic Herps of the Central Coast, The Wildlife Society, San Luis Obispo, CA, April 2016

San Joaquin Kit Fox Ecology, Conservation, and Survey Techniques, The Wildlife Society, Carrizo Plains, San Luis Obispo County, CA, July 2013

California Tiger Salamander Workshop, Elkhorn Slough Coastal Training Program, Watsonville, CA, April 2013

Acoustic Monitoring of Bats Workshop, The Wildlife Society, Santa Cruz County, CA, May 2012

Bat Ecology and Field Techniques Workshop, The Wildlife Society, Los Molinos, CA, April 2012

California Red-legged Frog Workshop, Elkhorn Slough Coastal Training Program, Watsonville, CA, April 2012

Bat Ecology and Field Techniques Workshop, The Wildlife Society, Monterey County, CA, September 2006.

CEQA Basics, AEP Workshop, San Luis Obispo, CA, November 2003

California Tiger Salamander Workshop, Rohnert Park, CA, October 2003

PROFESSIONAL AFFILIATION

The Wildlife Society, Central Coast Chapter. Representative to the Western Section Executive Board
2013-2016

Mrs. Jimerson-Kidd has over 15 years' experience in conducting herpetological, entomological, avian and botanical surveys. Her experience includes inventorying both plants and wildlife of southern and central and northwest California. She has experience in raptor trapping, handling, survey techniques, and nest monitoring, as well as some experience with mammal trapping. She also has extensive experience with small mammal identification. Mrs. Jimerson-Kidd has conducted numerous focused surveys or habitat assessments for California gnatcatcher, desert tortoise, least bell's vireo, flat-tailed horned lizard, burrowing owls, western spadefoot toad, Delhi-sands flower-loving fly, Arroyo toad, and Quino checkerspot butterfly. Additionally, her experience includes habitat assessments and focused for sensitive plants species, particularly desert species.

Education

BS, Natural Resources Planning & interpretation/ Ecology, Humboldt State University- 1998

Permits

- Federal Bird Marking sub-permit: 22951-C
- Flat-tailed Horned Lizard handling MOU (BLM)
- Scientific Collection Permit: 801128-03
- Federal 10A(1)a permit #036550-4
Coastal California Gnatcatcher
Quino Checkerspot Butterfly

Professional affiliations

- Wildlife Society
- Association of Field Ornithologists
- Raptor Research Foundation
- Society for the Study of Amphibians and Reptiles
- California Native Plant Society

Continued Education

Desert Tortoise Council Workshop 10/01
Tortoise Egg Handling and Burrow Construction Certificate 10/01
South Western Willow Flycatcher Workshop 5/01
So. Coast Missing Linkages Project Symposium 8/02
Bats of the Southwestern Desert 5/02
Burrowing Owl Symposium 10/03
California Tiger Salamander Workshop 4/13
California Manual of Vegetation CNPS workshop 1/15
Rapid Assessment/Releve Training (CNPS) 6/15

Job History

Kidd Biological, Inc. 2000- Present. Principle Biologist. Conduct Biological; assessments, focused surveys for sensitive species, project management, mitigation monitoring, restoration monitoring. On-going research of bird of prey in California.

Michael Brandman Associates. 2002- 2005. Project manager/Ecologist. Project Management, biological assessments, focused surveys, mitigation monitoring. Supervised 3-5 employees as well as sub-contractors. Assisted with Community outreach and education programs.

Humboldt State Museum of Vertebrate Zoology. 1996-1998. Assistant Curator. Managed and maintained museum specimens and catalogs, prepared new specimens, assisted researchers in locating relevant specimens from within the museum as well as locating and obtaining loans from other museums world-wide.

Humboldt County museum of Natural History. 1996-1998. Museum Assistant. Designed and created displays, managed collection, assisted with newsletter, created and taught children's classes and summer day camp, manned museum gift shop, organized and trained volunteers.

Select Professional Experience

Focused Surveys, California Gnatcatcher. Assisted in conducting a focused survey for the California gnatcatcher. The survey was conducted to determine the presence and location of any individuals or pairs of gnatcatchers within a 1000-acre parcel located in San Mateo County Park, Orange County, CA. Twenty-nine pairs of gnatcatchers were identified during the 2001 surveys. Participated in 2010 census surveys on Marine Corp Base Camp Pendleton.

Prepared an RMP for County of San Bernardino. Resource Management Plan was prepared for 13,000 acres in the Mojave Desert. During the surveys of the lands, numerous desert tortoise and burrowing owls as well as other sensitive species were observed. The plan focused on the minimizing efforts of a low-density housing project on sensitive species in the Mojave Desert. (2003)

Burrowing Owl Relocation. Coordinated with CDFG and USFWS to actively translocate one pair of burrowing owls from a project site in the City of Fontana to a conservation site on U.S. Naval Station, Seal Beach. Assisted in the trapping and release efforts as well as monitoring of the site during grading.

Assist in on-going Burrowing Owl research. Assists annually in capturing and banding of juvenile burrowing owls on a conservation site on U.S. Naval Station Seal Beach. Data is used to calculate nest success rates, particularly of translocated birds.

Managed biological studies for proposed wind turbine project. Managed 10 biologists and conducted migratory bird surveys, plant surveys and desert tortoise surveys for a 7 square mile proposed wind farm in the Mojave Desert. 2004-2005

Construction monitoring. Has monitored grading and other construction activity on numerous projects including cellular communications towers, military training facilities, County road maintenance, linear fiber-optics lines, park trails, large housing developments, and restoration activities. Species monitored include California gnatcatcher, least Bell's vireo, arroyo toad, desert tortoise, burrowing owl, nesting birds, flat-tailed horned lizard, and general wildlife.

Focused Surveys, Arroyo Toad. Conducted presence/absence surveys as well as pit-fall trapping in Camp Pendleton USMCB and San Mateo County Park in San Diego County, CA. Over 1000 Arroyo Toads were detected as well as egg strands, tadpoles and metamorphs during the 2001 surveys. Since then numerous surveys have been conducted for the toad in San Diego and Orange Counties.

Consultation with CDFG. Successfully completed 2081 permit applications for take of desert tortoise on a project in the Mojave Desert as well as a take permit for Mohave ground Squirrel in Victorville. 2003-2005.

Quino Checkerspot butterfly Surveys. Over the past decade, approximately 12 sites have been surveyed for the endangered butterfly. Survey areas included Northwestern Riverside County to southeastern San Diego County. Two power line projects were part of these surveys and required extensive area surveys. Additional surveys have been conducted for the BLM and the U.S. Forest Service for fire maintenance. In 2010, QCB were observed near Mount Palomar.

[EXT]RE: Requesting Review of a Kit For Habitat Evaluation for AT&T Site (CSL02657) Conditional Use Permit DRC2018-00176 for a Cell Site

Sanderson, Brandon@Wildlife <Brandon.Sanderson@wildlife.ca.gov>

Fri 8/16/2019 4:31 PM

To: Holly Phipps <hhipps@co.slo.ca.us>;

Cc: Cody Scheel <cscheel@co.slo.ca.us>;

2 attachments (2 MB)

Kit Fox Eval DRC2018-00176_revised_cdfw_8.16.19.pdf; hab eval guidelines.pdf;

ATTENTION: This email originated from outside the County's network. Use caution when opening attachments or links.

Holly,

Please see revised kit fox habitat evaluation with my edits. Please have consultant review the attached habitat evaluation guidelines to help answer evaluation questions. Per the guidelines the proposed project is located within the corridor between Carrizo and the Salinas Valley (Camp Roberts, etc.) which would therefore be degrading habitat between a core to subpopulation resulting in a score of 20 for question 1. The evaluation score was revised to reflect a score of 76 which results in 3:1 mitigation ratio reduced from the standard ratio of 4:1 for the project area.

-Brandon



Brandon Sanderson

Environmental Scientist

Habitat Conservation Planning

3196 S. Higuera St., Suite A

San Luis Obispo, CA 93401

805-594-6141

Brandon.Sanderson@wildlife.ca.gov

<http://www.wildlife.ca.gov/>

From: Holly Phipps <hhipps@co.slo.ca.us>

Sent: Friday, August 16, 2019 10:17 AM

To: Sanderson, Brandon@Wildlife <Brandon.Sanderson@wildlife.ca.gov>

Cc: Cody Scheel <cscheel@co.slo.ca.us>

Subject: Requesting Review of a Kit For Habitat Evaluation for AT&T Site (CSL02657) Conditional Use Permit DRC2018-00176 for a Cell Site

Hi Brandon,

Hope you have been enjoying your summer. It has been nice here in SLO.

Please review the attached Kit Fox Habitat Evaluation.

Cheers,

Holly Phipps, MCRP

North County & Winery Planner

Department of Planning and Building

976 Osos Street, Room 300

San Luis Obispo, CA, 93408

805-781-1162

<http://www.sloplanning.org/>

Kit Fox Habitat Evaluation Form

(guidelines)

Cover Sheet

Project Name Proposed Shandon Communications Tower

Date 05/10/2019

Project

Location* 1 mile Southwest of Shandon, CA.

*Include project vicinity map and project boundary on copy of U.S.G.S. 7.5 minute map (size may be reduced)

U.S.G.S. Quad Map Name

Shandon Quadrangle

Lat/Long or UTM coordinates (if available)

35 degrees 38' 38" N, 120 degrees 22' 54" W

Project Description:

Project Size 0.06 Acres Amount of Kit Fox Habitat Affected 0.06 Acres

Quantity of WHR Habitat Types Impacted (i.e. - 2 acres annual grassland, 3 acres blue oak woodland)

WHR type ~~vineyard~~ Ruderal grassland 0.06 Acres

WHR type _____ Acres

WHR type _____ Acres

WHR type _____ Acres

Comments: Tower site is adjacent to a rural residence and a tank and water well site.

Form Completed By: William J. Vanherweg

Rev 3/02
G:\envdiv\forms\kit fox
habitat

San Joaquin Kit Fox Habitat Evaluation form

Is the project area within 10 miles of a recorded San Joaquin kit fox observation or within contiguous suitable habitat as defined in question 2 (A-E)

- ☒ ~~Yes~~ Continue with evaluation form
☒ ~~No~~ Evaluation form/surveys are not necessary

1. Importance of the project area relative to Recovery Plan for Upland Species of the San Joaquin Valley, California (Williams et al., 1998)

- ☒ A. Project would block or degrade an existing corridor linking core populations or isolate a subpopulation (20) Please review habitat evaluation guidelines.
☐ B. Project is within core population (15)
☐ C. Project area is identified within satellite populations (12)
☒ D. Project area is within a corridor linking satellite populations (10)
☐ E. Project area is not within any of the previously described areas but is within known kit fox range (5)

2. Habitat characteristics of project area.

- ☐ A. Annual grassland or saltbush scrub present >50% of site (15)
☒ B. Grassland or saltbush scrub present but comprises <50% of project area (10)
☐ C. Oak savannah present on >50% of site (8) Based on photographs and aerial imagery site is located within ruderal grassland.
☒ D. Fallow ag fields or grain/alfalfa crops (7)
☒ E. Orchards/vineyards (5)
☐ F. Intensively maintained row crops or suitable vegetation absent (0)

3. Isolation of project area.

- ☒ A. Project area surrounded by contiguous kit fox habitat as described in Question 2a-e (15)
☒ B. Project area adjacent to at least 40 acres of contiguous habitat or part of an existing corridor (10)
☐ C. Project area adjacent to <40 acres of habitat but linked by existing corridor (i.e., river, canal, aqueduct) (7)
☐ D. Project area surrounded by ag but less than 200 yards from habitat (5)
☐ E. Project area completely isolated by row crops or development and is greater than 200 yards from potential habitat (0)

2a-e above are all considered kit fox habitat. Project site is surrounded by vineyards and grassland.

4. Potential for increased mortality as a result of project implementation. Mortality may come from direct (e.g., - construction related) or indirect (e.g., - vehicle strikes due to increases in post development traffic) sources.

- ☐ A. Increased mortality likely (10)
☐ B. Unknown mortality effects (5)
☒ C. No long term effect on mortality (0)

Revised 03-02

5. Amount of potential kit fox habitat affected.

- A. >320 acres (10)
- B. 160 - 319 acres (7)
- C. 80 - 159 acres (5)
- D. 40 - 79 acres (3)
- ☒ E. < 40 acres (1)

6. Results of project implementation.

- ☒ A. Project site will be permanently converted and will no longer support foxes (10) *This project is a permanent loss of habitat.*
- ☒ B. Project area will be temporarily impacted but will require periodic disturbance for ongoing maintenance (7)
- C. Project area will be temporarily impacted and no maintenance necessary (5)
- D. Project will result in changes to agricultural crops (2)
- E. No habitat impacts (0)

7. Project Shape

- ☒ A. Large Block (10) *This is a single block project not a linear project.*
- ☒ B. Linear with > 40 foot right-of-way (5)
- ☒ C. Linear with < 40 foot right-of-way (3)

8. Have San Joaquin kit foxes been observed within 3 miles of the project area within the last 10 years?

- ☒ A. Yes (10)
- B. No (0)

Scoring

1.	Recovery importance	10 20
2.	Habitat condition	5 10
3.	Isolation	10 15
4.	Mortality	0
5.	Quantity of habitat impacted	1
6.	Project results	7 10
7.	Project shape	3 10
8.	Recent observations	10

TOTAL

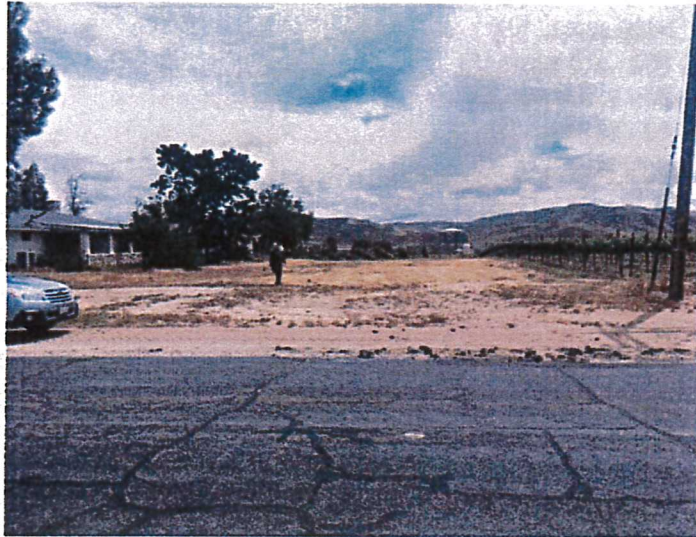
46 76

Revised 03/02-lpd

(3:1 mitigation ratio)

Revised by Brandon Sanderson of CDFW 8/6/2019.

ATTACHMENT B: SITE PHOTOS



1. Looking East from Truesdale Road at project site



2. Looking South at Vineyards



3. Looking north at project footprint.



4. Looking west at project footprint.



Photo 5. Looking East from the intersection of Truesdale Road and Starkey Road at proposed utility easement

Guidelines for Completing the Kit Fox Habitat Evaluation Form San Luis Obispo County

The Kit Fox Habitat Evaluation Form is intended to be used as a tool for addressing impacts to the San Joaquin kit fox from project related activities. The use of the form, associated mitigation, and implementation of the previously established avoidance criteria (preconstruction surveys, etc.) should, in most cases, eliminate "take" of this species and reduce project impacts to less than significant. However, "take" permits from CDFG and USFWS will be necessary if the project may result in the death or injury to a kit fox. Additionally, USFWS may require an HCP for any project that it determines may result in "harm" under FESA.

1. Importance of Project Area for Recovery - As stated in the question, the Recovery Plan for Upland Species of the San Joaquin Valley, California should be referenced. Core populations include Carrizo, western Kern County, and Panoche. The Salinas Valley (Camp Roberts, etc.) and Cuyama Valley are important subpopulations. Therefore, if a project degrades or eliminates the corridor between Carrizo and the Salinas Valley (core to subpopulation) or the corridor between Carrizo and western Kern County (core to core population), a score of 20 should be assigned. If the project area is on the Carrizo, a score of 15 should be assigned. Projects on Camp Roberts and north along the Salinas Valley should be given a 12. A 10 should be assigned to land linking Camp Roberts and Fort Hunter Liggett and a 5 should be given to lands not associated with any of the above (i.e.-Atascadero area).

2. Habitat Characteristics - Most of the choices for this question are self-explanatory. However, there are some questions with regard to fallow agriculture and suitable vegetation absent. If a field has been fallow for more than one year, it should be considered as one of the other habitat types (usually annual grassland). In some cases, this question has been answered suitable vegetation absent" because the land had been disked specifically to lower the score. This is obviously inappropriate at both the landowner (take may have occurred) and biological consultant level. In cases where there are questions as to land use history, the project proponent will be asked to provide proof that this land had been recently, or is currently, in cultivation (i.e. receipts from crop sales or similar documents).

3. Isolation of Project Area - This question should be answered with respect to the immediate project area in regards to kit fox habitat availability. Is the project area part of a small corridor linking larger areas of kit fox habitat? Is it part of a large block of existing fox habitat?

4. Mortality - Kit fox mortality due to vehicle strikes is common. Any project that substantially increases traffic will increase potential mortality. Therefore, an increase in mortality would be likely for a large residential development or road widening project. Installation of median barriers, even without road widening, would produce similar results. An increase in mortality would also be expected if rodent control measures (poisoning) were implemented in the project area. Unknown mortality effects should be chosen for smaller housing projects ranging from single residences to small housing developments. Finally, the "no long term effects on mortality" option is appropriate for projects resulting in temporary disturbance (fiber optic cable or pipeline installation) as long as routine maintenance and patrols are not needed. Also, microwave tower installations resulting in trips every month or so would fall into the "no long term effects" category.

5. Quantity of Habitat Impacts - The amount of kit fox habitat impacted by the proposed project (see habitat evaluation form cover sheet) should be used to answer this question. All lands considered as impacted under this question are subject to potential mitigation.

6. Results of Project Implementation - Again, the entire area of kit fox habitat to be impacted should be considered for this question. An argument has been presented that if only a portion of a large property is slated for development, there will be no habitat impacts since portions of the property are still available for use by kit foxes. This is not a correct interpretation of this question since only the lands impacted by the proposed project are subject to mitigation. For example, if 1 acre of a 10 acre lot is going to be developed, that single acre will be lost as kit fox habitat and therefore impacts on that single acre will need to be mitigated. The single acre will be permanently converted and would not support kit foxes and a score of 10 would be appropriate. The temporary impact with periodic disturbance choice would be selected for a project such as a gas pipeline or a leach field, which would need to be maintained on an intermittent basis (every two years or greater). Although the project area will be disturbed, it will provide habitat for some length of time between disturbances. "Changes to agricultural crops" should not be selected if land is converted from grazed rangelands to another crop (vineyard, barley, etc.). Rangelands and grazing have been shown to be compatible with, and sometimes beneficial, for healthy kit fox populations. Conversion of rangelands should be considered as habitat loss, not an agricultural conversion.

7. Project Shape - The shape of the project falls into roughly three categories; single block, linear with a less than 40 foot right-of-way, and linear with a greater than 40 foot right-of way. Most projects fall into the single block category. This includes residential and industrial developments. "Linear with a less than 40 foot right-of-way" is probably the appropriate choice for fiber optic cable installations, seismic testing, and most pipelines. Roads, large pipelines, and large transmission lines would require a greater than 40 foot right-of-way.

8. Recent Observations - Start with data from the California Natural Diversity Data Base, but also check with other consultants, species experts, and local biologists.