BIOLOGICAL RESOURCES ASSESSMENT FOR THE CANNABIS CULTIVATION OPERATION AT 6233 EICKHOFF ROAD, LAKEPORT, CALIFORNIA

February 14, 2020

Applicant:

Huntz, Inc.
6233 Eickhoff Road, Lakeport, CA 95453

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1. INTRODUCTION

1.1. PROJECT LOCATION AND DESCRIPTION

Natural Investigations Company conducted a biological resources assessment for a cannabis cultivation operation on a 78-acre property (APN 003-046-02) at 6233 Eickhoff Road, Lakeport, California (see exhibits). A 1-acre cultivation compound will be established. Ancillary facilities may consist of a greenhouse or hoophouse as well as outbuildings (Conex boxes and sheds) for material and chemical storage and product processing. Dirt access roads connect the cultivation operational areas. For this assessment, the Project Area was defined as the cultivation compound plus the ancillary facilities, and this 1-acre area was the subject of the impact analysis. The entire 78-acre property was defined as the Study Area. The Study Area is defined to identify biological resources adjacent to the Project Area, and is the area subject to potential indirect effects from Project implementation.

1.2. PURPOSE AND SCOPE OF ASSESSMENT

This Biological Resources Assessment was prepared to assist in compliance with the California Environmental Quality Act and the state and federal Endangered Species Acts. This assessment also functions to fulfill requirements for obtaining enrollment (a Notice of Applicability) in the State Water Resources Control Board's Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (General Order).

This assessment provides information about the biological resources within the Study Area, the regulatory environment affecting such resources, any potential Project-related impacts upon these resources, and finally, to identify mitigation measures and other recommendations to reduce the significance of these impacts. The specific scope of services performed for this assessment consisted of the following tasks:

- Compile all readily-available historical biological resource information about the Study Area;
- Spatially query state and federal databases for any occurrences of special-status species or habitats within the Study Area and vicinity;
- Perform a reconnaissance-level field survey of the Study Area, including photographic documentation;
- Inventory all flora and fauna observed during the field survey;
- Characterize and map the habitat types present within the Study Area, including any potentially-jurisdictional water resources;
- Evaluate the likelihood for the occurrence of any special-status species;
- Assess the potential for the Project to adversely impact any sensitive biological resources;
- Recommend mitigation measures designed to avoid or minimize Project-related impacts; and
- Prepare and submit a report summarizing all of the above tasks.

The scope of services does not include other services that are not described in this Section, such as formal aquatic resource delineations or protocol-level surveys for special-status species.

1.3. REGULATORY SETTING

The following section summarizes some applicable regulations of biological resources on real property in California.

1.3.1. Special-status Species Regulations

The United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service implement the Federal Endangered Species Act of 1973 (FESA) (16 USC §1531 et seq.). Threatened and endangered species on the federal list (50 CFR §17.11, 17.12) are protected from "take" (direct or

indirect harm), unless a FESA Section 10 Permit is granted or a FESA Section 7 Biological Opinion with incidental take provisions is rendered. Pursuant to the requirements of FESA, an agency reviewing a proposed project within its jurisdiction must determine whether any federally listed species may be present in the project area and determine whether the proposed project will have a potentially significant impact upon such species. Under FESA, habitat loss is considered to be an impact to the species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under FESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC §1536[3], [4]). Therefore, project-related impacts to these species or their habitats would be considered significant and would require mitigation. Species that are candidates for listing are not protected under FESA; however, USFWS advises that a candidate species could be elevated to listed status at any time, and therefore, applicants should regard these species with special consideration.

The California Endangered Species Act of 1970 (CESA) (California Fish and Game Code §2050 *et seq*., and CCR Title 14, §670.2, 670.51) prohibits "take" (defined as hunt, pursue, catch, capture, or kill) of species listed under CESA. A CESA permit must be obtained if a project will result in take of listed species, either during construction or over the life of the project. Section 2081 establishes an incidental take permit program for state-listed species. Under CESA, California Department of Fish and Wildlife (CDFW) has the responsibility for maintaining a list of threatened and endangered species designated under state law (CFG Code 2070). CDFW also maintains lists of species of special concern, which serve as "watch lists." Pursuant to requirements of CESA, an agency reviewing proposed projects within its jurisdiction must determine whether any state-listed species may be present in the Study Area and determine whether the proposed project will have a potentially significant impact upon such species. Project-related impacts to species on the CESA list would be considered significant and would require mitigation.

California Fish and Game Code Sections 4700, 5050, and 5515 designates certain mammal, amphibian, and reptile species "fully protected", making it unlawful to take, possess, or destroy these species except under issuance of a specific permit. The California Native Plant Protection Act of 1977 (CFG Code §1900 *et seq*.) requires CDFW to establish criteria for determining if a species or variety of native plant is endangered or rare. Section 19131 of the code requires that landowners notify CDFW at least 10 days prior to initiating activities that will destroy a listed plant to allow the salvage of plant material.

Many bird species, especially those that are breeding, migratory, or of limited distribution, are protected under federal and state regulations. Under the Migratory Bird Treaty Act of 1918 (16 USC §703-711), migratory bird species and their nests and eggs that are on the federal list (50 CFR §10.13) are protected from injury or death, and project-related disturbances must be reduced or eliminated during the nesting cycle. California Fish and Game Code (§3503, 3503.5, and 3800) prohibits the possession, incidental take, or needless destruction of any bird nests or eggs. Fish and Game Code §3511 designates certain bird species "fully protected", making it unlawful to take, possess, or destroy these species except under issuance of a specific permit. The Bald and Golden Eagle Protection Act (16 USC §668) specifically protects bald and golden eagles from harm or trade in parts of these species.

California Environmental Quality Act (CEQA) (Public Resources Code §15380) defines "rare" in a broader sense than the definitions of threatened, endangered, or fully protected. Under the CEQA definition, CDFW can request additional consideration of species not otherwise protected. CEQA requires that the impacts of a project upon environmental resources must be analyzed and assessed using criteria determined by the lead agency. Sensitive species that would qualify for listing but are not currently listed may be afforded protection under CEQA. The CEQA Guidelines (§15065) require that a substantial reduction in numbers of a rare or endangered species be considered a significant effect. CEQA Guidelines (§15380) provide for assessment of unlisted species as rare or endangered under CEQA if the species can be shown to meet the criteria for listing. Plant species on the California Native Plant Society (CNPS) Lists 1A, 1B, or 2 are typically considered rare under CEQA. California "Species of

Special Concern" is a category conferred by CDFW on those species that are indicators of regional habitat changes or are considered potential future protected species. While they do not have statutory protection, Species of Special Concern are typically considered rare under CEQA and thereby warrant specific protection measures.

1.3.2. Water Resource Protection

Real property that contains water resources are subject to various federal and state regulations and activities occurring in these water resources may require permits, licenses, variances, or similar authorization from federal, state and local agencies, as described next.

The Federal Water Pollution Control Act Amendments of 1972 (as amended), commonly known as the Clean Water Act (CWA), established the basic structure for regulating discharges of pollutants into "waters of the United States". Waters of the US includes essentially all surface waters, all interstate waters and their tributaries, all impoundments of these waters, and all wetlands adjacent to these waters. CWA Section 404 requires approval prior to dredging or discharging fill material into any waters of the US, especially wetlands. The permitting program is designed to minimize impacts to waters of the US, and when impacts cannot be avoided, requires compensatory mitigation. The US Army Corps of Engineers (USACE) is responsible for administering Section 404 regulations. Substantial impacts to jurisdictional wetlands may require an Individual Permit. Small-scale projects may require only a Nationwide Permit, which typically has an expedited process compared to the Individual Permit process. Mitigation of wetland impacts is required as a condition of the CWA Section 404 Permit and may include on-site preservation, restoration, or enhancement and/or off-site restoration or enhancement. The characteristics of the restored or enhanced wetlands must be equal to or better than those of the affected wetlands to achieve no net loss of wetlands.

Under CWA Section 401, every applicant for a federal permit or license for any activity which may result in a discharge to a water body must obtain State Water Quality Certification that the proposed activity will comply with State water quality standards. The California State Water Resources Control Board is responsible for administering CWA Section 401 regulations.

Section 10 of the Rivers and Harbors Act of 1899 requires approval from USACE prior to the commencement of any work in or over navigable Waters of the US, or which affects the course, location, condition or capacity of such waters. Navigable waters of the United States are defined as waters that have been used in the past, are now used, or are susceptible to use, as a means to transport interstate or foreign commerce up to the head of navigation. Rivers and Harbors Act Section 10 permits are required for construction activities in these waters.

California Fish and Game Code (§1601 - 1607) protects fishery resources by regulating "*any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake*." CDFW requires notification prior to commencement, and issuance of a Lake or Streambed Alteration Agreement, if a proposed project will result in the alteration or degradation of ''waters of the State". The limit of CDFW jurisdiction is subject to the judgment of the Department; currently, this jurisdiction is interpreted to be the "stream zone", defined as "*that portion of the stream channel that restricts lateral movement of water*" and delineated at "*the top of the bank or the outer edge of any riparian vegetation, whichever is more landward*". CDFW reviews the proposed actions and, if necessary, submits to the applicant a proposal for measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by the CDFW and the applicant is the Streambed Alteration Agreement. Projects that require a Streambed Alteration Agreement may also require a CWA 404 Section Permit and/or CWA Section 401 Water Quality Certification.

For construction projects that disturb one or more acres of soil, the landowner or developer must obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ).

The State Water Resources Control Board's Order WQ 2019-0001-DWQ General Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities protects receiving water bodies from water-quality impacts associated with cannabis cultivation using a combination of Best Management Practices, buffer zones, sediment and erosion controls, site management plans, inspections and reporting, and regulatory oversight.

1.3.3. Tree Protection

At the State level, in areas inside timberland, any tree removal is subject to the conditions and requirements set forth in the Z'berg-Nejedly Forest Practice Act and the California Forest Practice Rules. If development of a project will result in the removal of commercial tree species, one of the following permits is needed: Less than 3 Acre Conversion Exemption; Christmas Tree; Dead, Dying or Diseased, Fuelwood, or Split Products Exemption; a Public Agency, Public and Private Utility Right of Way Exemption; a Notice of Exemption from Timberland Conversion Permit for Subdivision; or an Application for Timberland Conversion Permit.

Lake County does not have a specific ordinance protecting native trees. However, under the Cannabis Ordinance 3084, Section 4, Subsection iii) Prohibited Activities (a) Tree Removal, Lake County restricts tree removal as follows:

> *"The removal of any commercial tree species as defined by the California Code of Regulations section 895.1, Commercial Species for the Coast Forest District and Northern Forest District, and the removal of any true oak species (Quercus species) or Tan Oak (Notholithocarpus species) for the purpose of developing a cannabis cultivation site should be avoided and minimized. This shall not include the pruning of any such tree species for the health of the tree or the removal of such trees if necessary for safety or disease concerns."*

During the permitting process, Lake County requires mitigation for the removal of protected trees; typical mitigation is tree replacement at a ratio of 2:1 or 3:1.

2. ENVIRONMENTAL SETTING

The Study Area is located within the cis-montane Sierra Nevada mountains geographic subregion, which is contained within the Sierra Nevada Mountains geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters. The Study Area and vicinity is in Climate Zone 7 - California's Gray Pine Belt, defined by hot summers and mild but pronounced winters without severe winter cold or high humidity (Sunset, 2020). The topography of the Study Area is a series of mountains bisected by a river.

3. METHODOLOGY

3.1. PRELIMINARY DATA GATHERING AND RESEARCH

Prior to conducting the field survey, the following information sources were reviewed:

- Any readily-available previous biological resource studies pertaining to the Study Area or vicinity
- United States Geologic Service (USGS) 7.5 degree-minute topographic quadrangles of the Study Area and vicinity
- Aerial photography of the Study Area
- California Natural Diversity Database (CNDDB), electronically updated monthly by subscription
- USFWS species list (IPaC Trust Resources Report).

3.2. FIELD SURVEY

Consulting biologist Tim Nosal, MS. conducted a reconnaissance-level field survey on February 7, 2020. A variable-intensity pedestrian survey was performed, and modified to account for differences in terrain, vegetation density, and visibility. All visible fauna and flora observed were recorded in a field notebook, and identified to the lowest possible taxon. Survey efforts emphasized the search for any special-status species that had documented occurrences in the CNDDB within the vicinity of the Study Area and those species on the USFWS species list (Appendix 1).

When a specimen could not be identified in the field, a photograph or voucher specimen (depending upon permit requirements) was taken and identified in the laboratory using a dissecting scope where necessary. Dr. Graening holds the following scientific collection permits: CDFW Scientific Collecting Permit No. SC-006802; and CDFW Plant Voucher Specimen Permit 09004. Tim Nosal holds CDFW Plant Voucher Specimen Permit 2081(a)-16-102-V. Taxonomic determinations were facilitated by referencing museum specimens or by various texts, including the following: Powell and Hogue (1979); Pavlik (1991); (1993); Brenzel (2012); Stuart and Sawyer (2001); Lanner (2002); Sibley (2003); Baldwin et al. (2012); Calflora (2020); CDFW (2020b,c); NatureServe 2020; and University of California at Berkeley (2020a,b).

The locations of any special-status species sighted were marked on aerial photographs and/or georeferenced with a geographic positioning system (GPS) receiver. Habitat types occurring in the Study Area were mapped on aerial photographs, and information on habitat conditions and the suitability of the habitats to support special-status species was also recorded. The Study Area was also informally assessed for the presence of potentially-jurisdictional water features, including riparian zones, isolated wetlands and vernal pools, and other biologically-sensitive aquatic habitats

3.3. MAPPING AND OTHER ANALYSES

Locations of species' occurrences and habitat boundaries within the Study Area were digitized to produce the final habitat maps. The boundaries of potentially jurisdictional water resources within the Study Area were identified and measured in the field, and similarly digitized to calculate acreage and to produce

informal delineation maps. Geographic analyses were performed using geographical information system software (ArcGIS 10, ESRI, Inc.). Vegetation communities (assemblages of plant species growing in an area of similar biological and environmental factors), were classified by Vegetation Series (distinctive associations of plants, described by dominant species and particular environmental setting) using the CNPS Vegetation Classification system (Sawyer and Keeler-Wolf, 1995). Informal wetland delineation methods consisted of an abbreviated, visual assessment of the three requisite wetland parameters (hydrophytic vegetation, hydric soils, hydrologic regime) defined in the US Army Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory, 1987). Wildlife habitats were classified according to the CDFW's California Wildlife Habitat Relationships System (CDFW, 2020c). Species' habitat requirements and life histories were identified using the following sources: Baldwin et al. (2012); CNPS (2020), Calflora (2020); CDFW (2020a,b,c); and University of California at Berkeley (2020a,b).

4. RESULTS

4.1. INVENTORY OF FLORA AND FAUNA FROM FIELD SURVEY

All plants detected during the field survey of the Study Area are listed in Appendix 2. The following animals were observed during the field survey: Northern Pacific treefrog (*Pseudacris regilla*); western fence lizard (*Sceloporus occidentalis*); black-tailed jackrabbit (*Lepus californicus*); Botta's pocket gopher (*Thomomys bottae*); Columbian black-tailed deer (*Odocoileus hemionus columbianus*); coyote (*Canis latrans*); dusky-footed wood rat (*Neotoma fuscipes*); gray fox (*Urocyon cinereoargenteus*); pig (*Sus scrofa*); acorn woodpecker (*Melanerpes formicivorus*); American crow (*Corvus brachyrhynchos*); American robin (*Turdus migratorius*); Anna's hummingbird (*Calypte anna*); Bewick's wren (*Thryomanes bewickii*); California quail (*Callipepla californica*); California scrub jay (*Aphelocoma californica*); California thrasher (*Toxostoma redivivum*); California towhee (*Melozone crissalis*); common raven (*Corvus corax*); red-tailed hawk (*Buteo jamaicensis*); spotted towhee (*Pipilo maculatus*) and other common songbirds.

4.2. VEGETATION COMMUNITIES AND WILDLIFE HABITAT TYPES

4.2.1. Terrestrial Vegetation Communities

The Study Area contains the following terrestrial vegetation communities: these vegetation communities are discussed here and are delineated in the Exhibits.

Ruderal/Disturbed. These areas consist of disturbed or converted natural habitat that is now either in ruderal state, planted with cannabis, graded, or urbanized with gravel roads. Vegetation within this habitat type consists primarily of nonnative weedy or invasive species or ornamental plants lacking a consistent community structure. This habitat is classified as "Urban" and "Barren" wildlife habitat types by CDFW's Wildlife Habitat Relationship System (WHR). This habitat type provides limited resources for wildlife and is utilized primarily by species tolerant of human activities. The disturbed and altered condition of these lands greatly reduces their habitat value and ability to sustain rare plants or diverse wildlife assemblages.

Chaparral. The chaparral community consists mostly of chamise with interior live oak, leather oak, mountain mahogany and toyon and can be classified as the Holland Type "Chamise chaparral".

Live oak woodland. The dominant canopy species are gray pine (*Pinus sabiniana*) and interior live oak (*Quercus wislizeni*). The understory varies with canopy density, and includes shrubs such as common manzanita (*Arctostaphylos manzanita*), toyon (*Heteromeles arbutifolia*) and poison oak (*Toxicodendron diversilobum*) and herbaceous species such as ripgut brome (*Bromus diandrus*), slender wild oat (*Avena barbata*), false brome (*Brachypodium distachyon*), Pacific sanicle (*Sanicula crassicaulis*), bedstraw (Galium sp.), tall sock destroyer (*Torilis arvensis*) and buttercup (*Ranunculus* sp.). The mixed oak/pine woodland is found throughout the Study Area. This vegetation can be classified as "Quercus wislizeni woodland alliance or Pinus sabiniana woodland alliance (Sawyer et al, 2009)" or as the Holland Type "Gray pine-oak woodland".

Blue Oak Woodland: Tree-dominated habitats with an open canopy are found on the flat areas north of the ridge as well as along the south-facing slopes of the ridge itself. These areas dominated by oaks can be further described as a blue oak woodland. The blue oak woodland consists of blue oak (*Quercus douglasii*) as the principal species in the canopy with occasional gray pine and interior live oak. The understory of the woodland consists of medusahead grass (Elymus caput-medusae), ripgut brome, soft chess (*Bromus hordeaceus*), clarkia (*Clarkia* spp.) and Italian thistle (*Carduus pycnocephalus*). This vegetation type can be classified as the Holland

Type “Blue Oak Woodland” or as “*Quercus douglasii* Woodland Alliance” (Sawyer et al. 2009)”.

4.2.2. Wildlife Habitat Types

Wildlife habitat types were classified using CDFW’s Wildlife Habitat Relationship System. The Study Area contains the following wildlife habitat types: montane hardwood; chaparral; blue oak-foothill pine ; urban; and barren.

4.2.3. Critical Habitat and Special-status Habitat

No critical habitat for any federally-listed species occurs within the Study Area. No special-status habitats were detected within the Study Area other than the watercourses themselves. The CNDDB reported no special-status habitats within the Study Area. The CNDDB reported no special-status habitats in a 5-mile radius outside of the Study Area.

4.2.4. Habitat Plans and Wildlife Corridors

Wildlife movement corridors link remaining areas of functional wildlife habitat that are separated primarily by human disturbance, but natural barriers such as rugged terrain and abrupt changes in vegetation cover are also possible. Wilderness and open lands have been fragmented by urbanization, which can disrupt migratory species and separate interbreeding populations. Corridors allow migratory movements and act as links between these separated populations.

The Study Area appears to be mapped inside an area designated as “Essential Connectivity Areas - California Essential Habitat Connectivity.” The open space within the Study Area provides unrestricted animal movement. The Study Area is not located within any adopted Habitat Conservation Plan or Natural Community Conservation Plan.

4.3. LISTED SPECIES AND OTHER SPECIAL-STATUS SPECIES

For the purposes of this assessment, “special status” is defined to be species that are of management concern to state or federal natural resource agencies, and include those species that are:

- Listed as endangered, threatened, proposed, or candidate for listing under the Federal Endangered Species Act;
- Listed as endangered, threatened, rare, or proposed for listing, under the California Endangered Species Act of 1970;
- Designated as endangered or rare, pursuant to California Fish and Game Code (§1901);
- Designated as fully protected, pursuant to California Fish and Game Code (§3511, §4700, or §5050);
- Designated as a species of special concern by CDFW;
- Plants considered to be rare, threatened or endangered in California by the California Native Plant Society (CNPS); this consists of species on Lists 1A, 1B, and 2 of the CNPS Ranking System; or
- Plants listed as rare under the California Native Plant Protection Act.

4.3.1. Reported Occurrences of Listed Species and Other Special-status Species

A list of special-status plant and animal species that have occurred within the Study Area and vicinity was compiled based upon the following:

- Any previous and readily-available biological resource studies pertaining to the Study Area;
- Informal consultation with USFWS by generating an electronic Species List (Information for Planning and Conservation website at https://ecos.fws.gov/ipac/); and
- A spatial query of the CNDDB.

The CNDDB was queried and any reported occurrences of special-status species were plotted in relation to the Study Area boundary using GIS software (see exhibits). The CNDDB reported no special-status

species occurrences within the Study Area. Various species were reported in a 10-mile radius (see following table).

A USFWS species list was generated online using the USFWS' IPaC Trust Resource Report System (see Appendix 1). This list is generated using a regional and/or watershed approach and does not necessarily indicate that the Study Area provides suitable habitat. The following listed species should be considered in the impact assessment:

- Birds
  - Northern Spotted Owl (*Strix occidentalis caurina*) Threatened
- Amphibians
  - California Red-legged Frog (*Rana draytonii*) Threatened
- Fishes
  - Delta Smelt (*Hypomesus transpacificus*) Threatened
- Flowering Plants
  - Burke's Goldfields (*Lasthenia burkei*) Endangered
- Migratory Birds

Table 1. Special-status Species Reported by CNDDB in the Vicinity of the Study Area

Common Name Scientific Name	Status*	General Habitat	Microhabitat
Red-bellied newt *Taricha rivularis*	CSSC	Found in coastal woodlands and redwood forests along the coast of Northern California	A stream or river dweller. Larvae retreat into vegetation and under stones during the day.
Foothill yellow-legged frog *Rana boylii*	CCT/ CSSC	Partly-shaded, shallow streams & riffles with a rocky substrate in a variety of habitats.	Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.
Double-crested cormorant *Phalacrocorax auritus*	CWL	Colonial nester on coastal cliffs, offshore islands, & along lake margins in the interior of the state.	Nests along coast on sequestered islets, usually on ground with sloping surface, or in tall trees along lake margins.
Great blue heron *Ardea herodias*	CSSC	Colonial nester in tall trees, cliffsides, and sequestered spots on marshes.	Rookery sites in close proximity to foraging areas: marshes, lake margins, tide-flats, rivers and streams, wet meadows.
Osprey *Pandion haliaetus*	CWL	Ocean shore, bays, fresh-water lakes, and larger streams.	Large nests built in tree-tops within 15 miles of a good fish-producing body of water.
Tricolored blackbird *Agelaius tricolor*	CT/ CSSC	Highly colonial species, most numerous in Central Valley & vicinity. Largely endemic to California.	Requires open water, protected nesting substrate, & foraging area with insect prey within a few km of the colony.
Clear Lake hitch *Lavinia exilicauda chi*	CT	Found only in clear lake, lake co, and associated ponds. Spawns in streams flowing into clear lake.	Adults found in the limnetic zone. Juveniles found in the nearshore shallow-water habitat hiding in the vegetation.
Sacramento perch *Archoplites interruptus*	CSSC	Historically found in the sloughs, slow-moving rivers, and lakes of the central valley.	Prefers warm water. Aquatic vegetation is essential for young. Tolerates wide range of physio-chemical water conditions.
Silver-haired bat *Lasionycteris noctivagans*	CSSC	Primarily a coastal & montane forest dweller feeding over streams, ponds & open brushy areas.	Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes & rarely under rocks. Needs drinking water.
Townsend's big-eared bat *Corynorhinus townsendii*	CSSC	Throughout California in a wide variety of habitats. Most common in mesic sites.	Roosts in the open, hanging from walls & ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.
Humboldt marten *Martes caurina humboldtensis*	CE/ CSSC	Occurs only in the coastal redwood zone from the Oregon border south to Sonoma County.	Associated with late-successional coniferous forests, prefer forests with low, overhead cover.
Fisher - West Coast DPS *Pekania pennanti*	CT/ CSSC	Intermediate to large-tree stages of coniferous forests & deciduous-riparian areas with high percent canopy closure.	Uses cavities, snags, logs & rocky areas for cover & denning. Needs large areas of mature, dense forest.
American badger *Taxidea taxus*	CSSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	Needs sufficient food, friable soils & open, uncultivated ground. Preys on burrowing rodents. Digs burrows.
Western pond turtle *Emys marmorata*	CSSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams & irrigation ditches, usually with aquatic vegetation, be	Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying
Brownish dubiraphian riffle beetle *Dubiraphia brunnescens*	CSSC	Aquatic; known only from the ne shore of clear lake, lake county.	Inhabits exposed, wave-washed willow roots.
Western bumble bee *Bombus occidentalis*	CSSC	Once common & widespread, species has declined precipitously from	

		central Ca to southern B.C., perhaps from disease.	
Obscure bumble bee *Bombus caliginosus*	CSSC	Open grassy coastal prairies and Coast Range meadows. Nesting occurs underground as well as above ground in abandoned bird nests.	Food plants include *Ceanothus, Cirsium, Clarkia, Keckiella, Lathyrus, Lotus, Lupinus, Rhododendron, Rubus, Trifolium,* and *Vaccinium.*
Blennosperma vernal pool andrenid bee *Andrena blennospermatis*	CSSC	This bee is oligolectic on vernal pool Blennosperma.	Bees nest in the uplands around vernal pools.
Toren's grimmia *Grimmia torenii*	1B.3	Cismontane woodland, lower montane coniferous forest, chaparral.	Openings, rocky, boulder and rock walls, carbonate, volcanic. 325-1160 m.
Small-flowered calycadenia *Calycadenia micrantha*	1B.2	Chaparral, valley and foothill grassland, meadows and seeps.	Rocky talus or scree; sparsely vegetated areas. Occasionally on roadsides; sometimes on serpentine. 5-1500 m.
Colusa layia *Layia septentrionalis*	1B.2	Chaparral, cismontane woodland, valley and foothill grassland.	Scattered colonies in fields and grassy slopes in sandy or serpentine soil. 145-1095m.
Beaked tracyina *Tracyina rostrata*	1B.2	Cismontane woodland, valley and foothill grassland.	Open grassy meadows within oak woodland and grassland habitats. 90-790 m.
Bent-flowered fiddleneck *Amsinckia lunaris*	1B.2	Cismontane woodland, valley and foothill grassland.	50-500m.
Serpentine cryptantha *Cryptantha dissita*	1B.2	Chaparral.	Serpentine outcrops. 330-730m.
Mayacamas popcornflower *Plagiobothrys lithocaryus*	1A	Meadows? Valley and foothill grassland, cismontane woodland, chaparral?	Moist sites. 285-450m.
Hoffman's bristly jewelflower *Streptanthus glandulosus ssp. hoffmanii*	1B.3	Chaparral, cismontane woodland, valley and foothill grassland.	Moist, steep rocky banks, in serpentine and non-serpentine soil. 120-475m.
Watershield *Brasenia schreberi*	2B.3	Freshwater marshes and swamps.	Aquatic from water bodies both natural and artificial in California.
Raiche's manzanita *Arctostaphylos stanfordiana ssp. raichei*	1B.1	Chaparral, lower montane coniferous forest.	Rocky, serpentine sites. Slopes and ridges. 450-1000 m.
Konocti manzanita *Arctostaphylos manzanita ssp. elegans*	1B.3	Chaparral, cismontane woodland, lower montane coniferous forest.	Volcanic soils. 395-1615 m.
Anthony Peak lupine *Lupinus antoninus*	1B.2	Upper montane coniferous forest, lower montane coniferous forest.	Open areas with surrounding forest; rocky sites. 1220-2285 m.
Glandular western flax *Hesperolinon adenophyllum*	1B.2	Chaparral, cismontane woodland, valley and foothill grassland.	Serpentine soils; generally found in serpentine chaparral. 150-1315 m.
Two-carpellate western flax *Hesperolinon bicarpellatum*	1B.2	Serpentine chaparral.	Serpentine barrens at edge of chaparral. 60-1005 m.
Small groundcone *Kopsiopsis hookeri*	2B.3	North coast coniferous forest.	Open woods, shrubby places, generally on gaultheria shallon. 90-885 m.
Rincon Ridge ceanothus *Ceanothus confusus*	1B.1	Closed-cone coniferous forest, chaparral, cismontane woodland.	Known from volcanic or serpentine soils, dry shrubby slopes. 75-1065 m.
Bolander's horkelia *Horkelia bolanderi*	1B.2	Lower montane coniferous forest, chaparral, meadows, valley and foothill grassland.	Grassy margins of vernal pools and meadows. 450-1100 m.

Boggs Lake hedge-hyssop *Gratiola heterosepala*	CE/1B.2	Marshes and swamps (freshwater), vernal pools.	Clay soils; usually in vernal pools, sometimes on lake margins. 10-2375 m.
Bristly sedge *Carex comosa*	2B.1	Marshes and swamps.	Lake margins, wet places; site below sea level is on a delta island. -5-1005m.

*Definitions of Status Codes: FE = Federally listed as endangered; FT = Federally listed as threatened; FPE = Federally proposed for listing as endangered; FPT = Federally proposed for listing as threatened; FC = Candidate for Federal listing; MB = Migratory Bird Act; CE = California State listed as endangered; CT = California State listed as threatened; CSSC = California species of special concern; CR = California rare species; CFP = California fully protected species; CNPS (California Native Plant Society) List 1A = Plants presumed extinct in California by CNPS; CNPS List 1B = CNPS designated rare or endangered plants in California and elsewhere; and CNPS List 2 = CNPS designated rare or endangered plants in California, but more common elsewhere. Global Ranking: G1 = Critically Imperiled; G2 = Imperiled; G3 = Vulnerable. State Ranking: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable.
**Copied verbatim from CNDDB, unless otherwise noted.

4.3.2. Listed Species or Special-status Species Observed During Field Survey

During the field survey, no special-status species were detected within the Study Area.

4.3.3. Potential for Listed Species or Special-status Species to Occur in the Study Area

The project areas have a low potential to harbor special-status species because of the lack of natural habitats and because of human activities. The forest and woodland habitats within the Study Area have a low to medium potential for harboring special-status species. The channels and in-stream wetlands have a medium to high potential for harboring special-status species.

4.4. POTENTIALLY-JURISDICTIONAL WATER RESOURCES

The USFWS National Wetland Inventory reported one water feature within the Project Area; 1 water feature was reported within the Study Area: an intermittent channel.

An informal assessment for the presence of potentially-jurisdictional water resources within the Study Area was also conducted during the field survey. For purposes of this biological site assessment, non-wetland waters were classified using the California Forest Practice Rules. The California Forest Practice Rules define a Class I watercourse as 1) a watercourse providing habitat for fish always or seasonally, and/or 2) providing a domestic water source; a Class II watercourse is 1) a watercourse capable of supporting non-fish aquatic species, or 2) a watercourse within 1000 feet of a watercourse that seasonally or always has fish present; a Class III watercourse is a watercourse with no aquatic life present and that shows evidence of being capable of transporting sediment to Class I and Class II waters during high water flow conditions.

The Project Area does not contain any channels or wetlands. The following water features were detected within the Study Area during the field survey (see Exhibits): several unnamed ephemeral channels (Class III watercourses) and one unnamed intermittent channel (Class II watercourse). Wetlands and riparian habitat (willows) are present in the intermittent channel. There are no or vernal pools or other isolated wetlands in the Study Area.

5. IMPACT ANALYSES AND MITIGATION MEASURES

This section establishes the impact criteria, then analyzes potential Project-related impacts upon the known biological resources within the Study Area, and then suggests mitigation measures to reduce these impacts to a less-than-significant level.

5.1. IMPACT SIGNIFICANCE CRITERIA

The significance of impacts to biological resources depends upon the proximity and quality of vegetation communities and wildlife habitats, the presence or absence of special-status species, and the effectiveness of measures implemented to protect these resources from Project-related impacts. As defined by CEQA, the Project would be considered to have a significant adverse impact on biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a special-status species in local or regional plans, policies, or regulations, or by USFWS or CDFW
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by USFWS or CDFW
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
- Conflict with any county or municipal policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved governmental habitat conservation plan.

5.2. IMPACT ANALYSIS

The following discussion evaluates the potential for Project-related activities to adversely affect biological resources. The Project boundaries were digitized and then overlaid on the habitat map using GIS to quantify potential impacts. Historical aerial photos were also analyzed for changes in land use.

5.2.1. Potential Direct / Indirect Adverse Effects Upon Special-status Species

- *Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The project areas have a low potential to harbor special-status species because of the lack of natural habitats and because of human activities. The forest and woodland habitats within the Study Area have a low to medium potential for harboring special-status species. The channels have a medium to high potential for harboring special-status species, although these aquatic habitats do not appear to persist long enough to sustain aquatic special-status species. No impacts to special-status species were identified from project implementation. Therefore, no mitigation is required. If land clearing is performed in the future, a pre-construction special-status species survey is recommended.

The Study Area contains suitable nesting habitat for various bird species because of the presence of trees and poles. However, no nests or nesting activity was observed in the project area during the field survey. Trees must be inspected for the presence of active bird nests before tree felling or ground clearing. If active nests are present in the project area during construction of the project, CDFW should be consulted to develop measures to avoid "take" of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site.

Recommended Mitigation Measures

No mitigation is necessary.

5.2.2. Potential Direct / Indirect Adverse Effects Upon Special-status Habitats or Natural Communities or Corridors

- *Will the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The Study Area is not within any designated listed species' critical habitat. The Study Area contains riparian habitat and wetland habitat only in the intermittent channel. The cultivation areas were designed with a minimum 100-foot buffer from all watercourses. There is no evidence that project implementation will impact any special-status habitats.

Recommended Mitigation Measures

No mitigation is necessary.

5.2.3. Potential Direct / Indirect Adverse Effects On Jurisdictional Water Resources

- *Will the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

There are no channels or wetlands within the Project Areas. Several ephemeral channels (Class III watercourses) and one intermittent channel (Class II watercourse) are present within the Study Area during the field survey (see Exhibits). The cultivation areas were designed with a minimum 100-foot buffer from watercourses.

Cultivators who enroll in the State Water Board's Waste Discharge Requirements for Cannabis Cultivation Order WQ 2019-0001-DWQ must comply with the Minimum Riparian Setbacks, as summarized in the following table. The Project would be considered to have a significant adverse impact on jurisdictional water resources if it would be non-compliant with these requirements. The minimum riparian setbacks apply to all land disturbance, cannabis cultivation activities, and facilities (e.g., material or vehicle storage, diesel powered pump locations, water storage areas, and chemical toilet placement).

Minimum Riparian Setbacks

Common Name	Watercourse Class	Distance
Perennial watercourses, waterbodies (e.g. lakes, ponds), or springs	I	150 ft.
Intermittent watercourses or wetlands	II	100 ft.
Ephemeral watercourses	III	50 ft.
Man-made irrigation canals, water supply reservoirs, or hydroelectric canals that support native aquatic species	IV	Established riparian zone vegetation

The proposed project is compliant with the setback requirements of Cannabis Cultivation Order WQ 2019-0001-DWQ.

Potential indirect impacts to water resources could occur during construction by increased erosion and sedimentation in receiving water bodies due to soil disturbance. If the total area of ground disturbance from installation of the cultivation operation is 1 acre or more, the Cultivator will need to enroll for coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 2009-0009-DWQ).

Potential adverse impacts to water resources could occur during operation of cultivation activities resources by discharge of sediment or other pollutants (fertilizers, pesticides, human waste, etc.) into receiving waterbodies. However, the project proponent must file a Notice of Intent and enroll in Cannabis Cultivation Order WQ 2019-0001-DWQ. Compliance with this Order will ensure that cultivation operations will not significantly impact water resources by using a combination of Best Management Practices (BMPs), buffer zones, sediment and erosion controls, site management plans, inspections and reporting, and regulatory oversight. Therefore, no mitigation is required.
It is recommended that a formal delineation of jurisdictional waters be performed before construction work, or ground disturbance, is performed near any wetland or drainage.

Recommended Mitigation Measures

No impacts were identified, and therefore no mitigation measures are proposed.

5.2.4. Potential Impacts to Wildlife Movement, Corridors, etc.

- *Will the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Although mapped wildlife corridors (such as the California Essential Habitat Connectivity Area layer in CNDDB) exist within or near the Study Area, the Project would not have a significant impact on wildlife movement because it would not block movement and the majority of the open space in the Study Area would still be available. Implementation of the proposed project would necessitate erection of security fences around the cultivation compounds. These fences do not allow animal movement and may act as a local barrier to wildlife movement. However, the fenced cultivation areas are surrounded by open space, allowing wildlife to move around these fenced areas. Thus, implementation of the proposed project is a less than significant impact upon wildlife movement. Implementation of the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Recommended Mitigation Measures

No mitigation is necessary.

5.2.5. Potential Conflicts With Ordinances, Habitat Conservation Plans, etc.

- *Will the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Will the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

If construction of the project will require the removal of trees protected by the County and CalFire, this is a potentially significant impact before mitigation.

The project does not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved governmental habitat conservation plan. The Study Area is not within the coverage area of any adopted Habitat Conservation Plan or Natural Community Conservation Plan.

Recommended Mitigation Measures

Lake County requires mitigation for the removal of commercial tree species and native oak species. If development of the project will result in the removal of commercial tree species, one of the following permits is needed: Less than 3 Acre Conversion Exemption; Christmas Tree; Dead, Dying or Diseased, Fuelwood, or Split Products Exemption; a Public Agency, Public and Private Utility Right of Way Exemption; a Notice of Exemption from Timberland Conversion Permit for Subdivision; or an Application for Timberland Conversion Permit.

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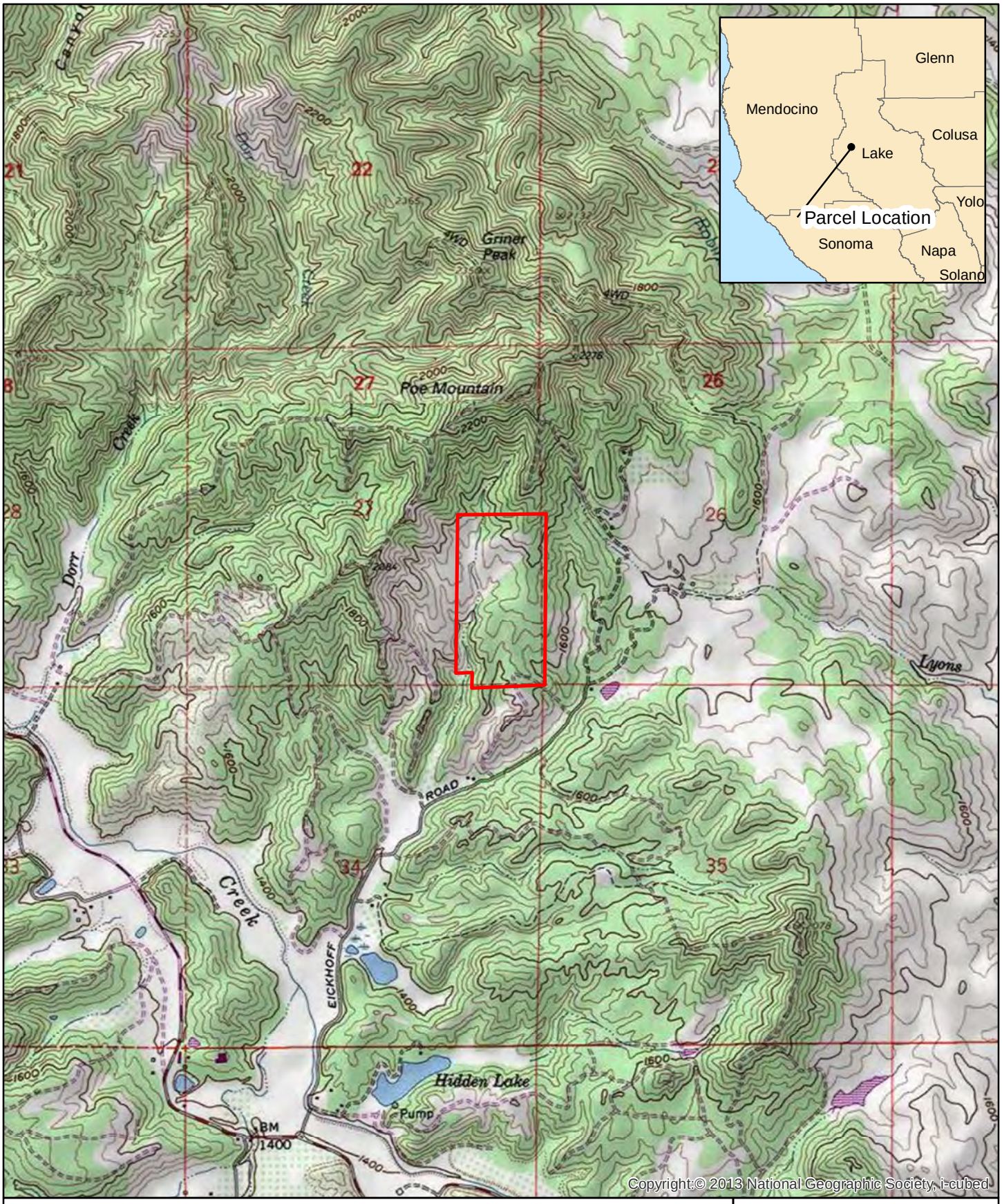
EXHIBITS



Parcel Location

0 0.5 1 Kilometers

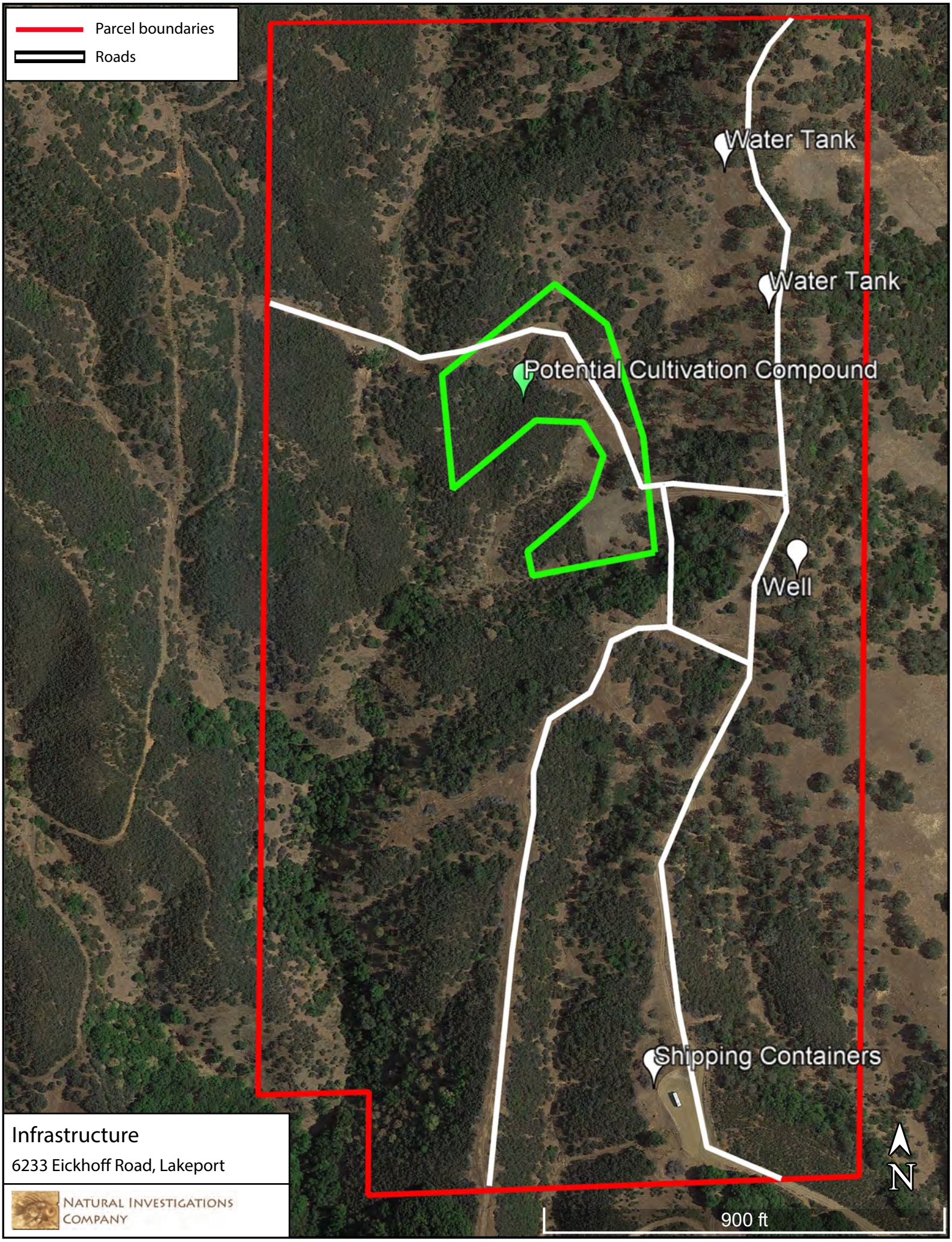
0 0.5 1 Miles

1:24,000

6233 Eickhoff Road
Parcel Location Map

NATURAL INVESTIGATIONS COMPANY

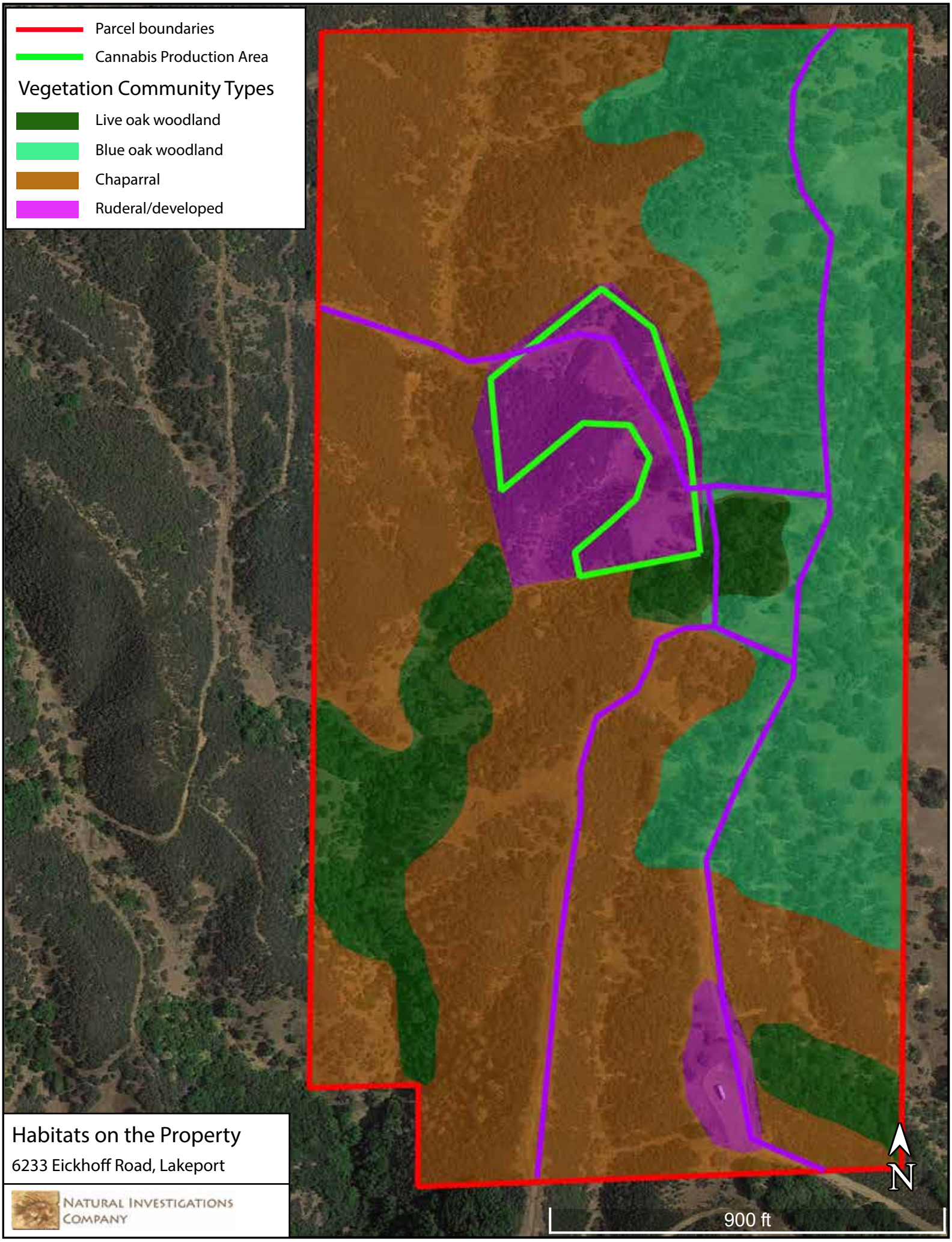
Map Date 1/29/2020 Lakeport 1958 Quadrangle Photorevised 1978 Minor Revision 1994:Township 15N, Range 10W, Section 26,27



Infrastructure

6233 Eickhoff Road, Lakeport

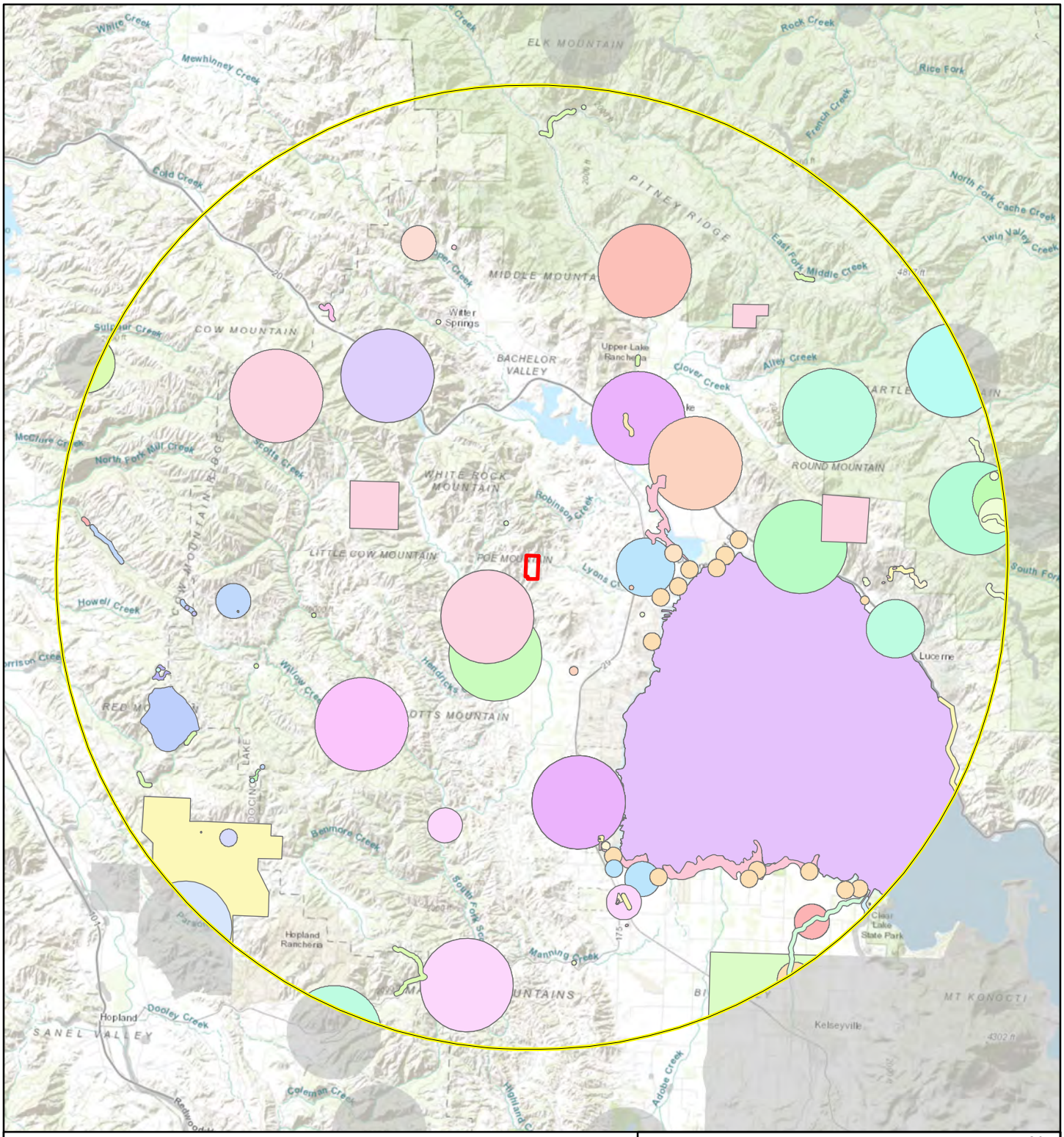
Natural Investigations Company



Habitats on the Property

6233 Eickhoff Road, Lakeport

Natural Investigations Company



Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist inshowing features discussed in an attached document. Natural Investigations Company can not guarantee the accuracy and content of electronic files.The master file is stored by Natural Investigations Company and will serve as the official record of this communication.
3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.Data Sources: California Department of Fish and Wildlife. 2020. RareFind 5.x, California Natural Diversity Data Base. Biogeographic Data Branch, Sacramento, California.
(updated monthly by subscription service)

Special-Status Species Occurrences Map

6233 Eickhoff Road

Lakeport 1958 Quadrangle Photorevised 1978 Minor Revision 1994: Township 15N, Range 10W, Section 26,27

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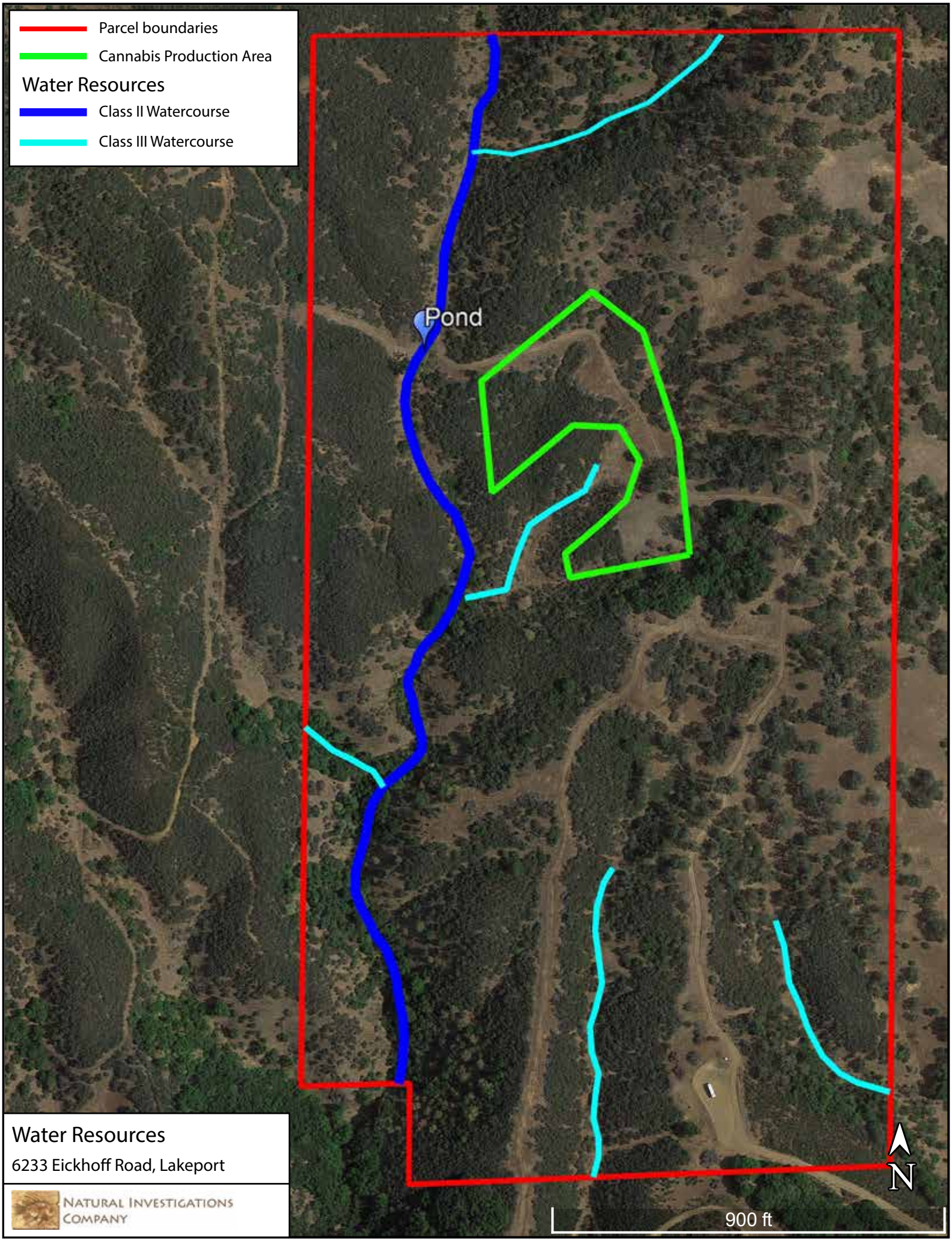
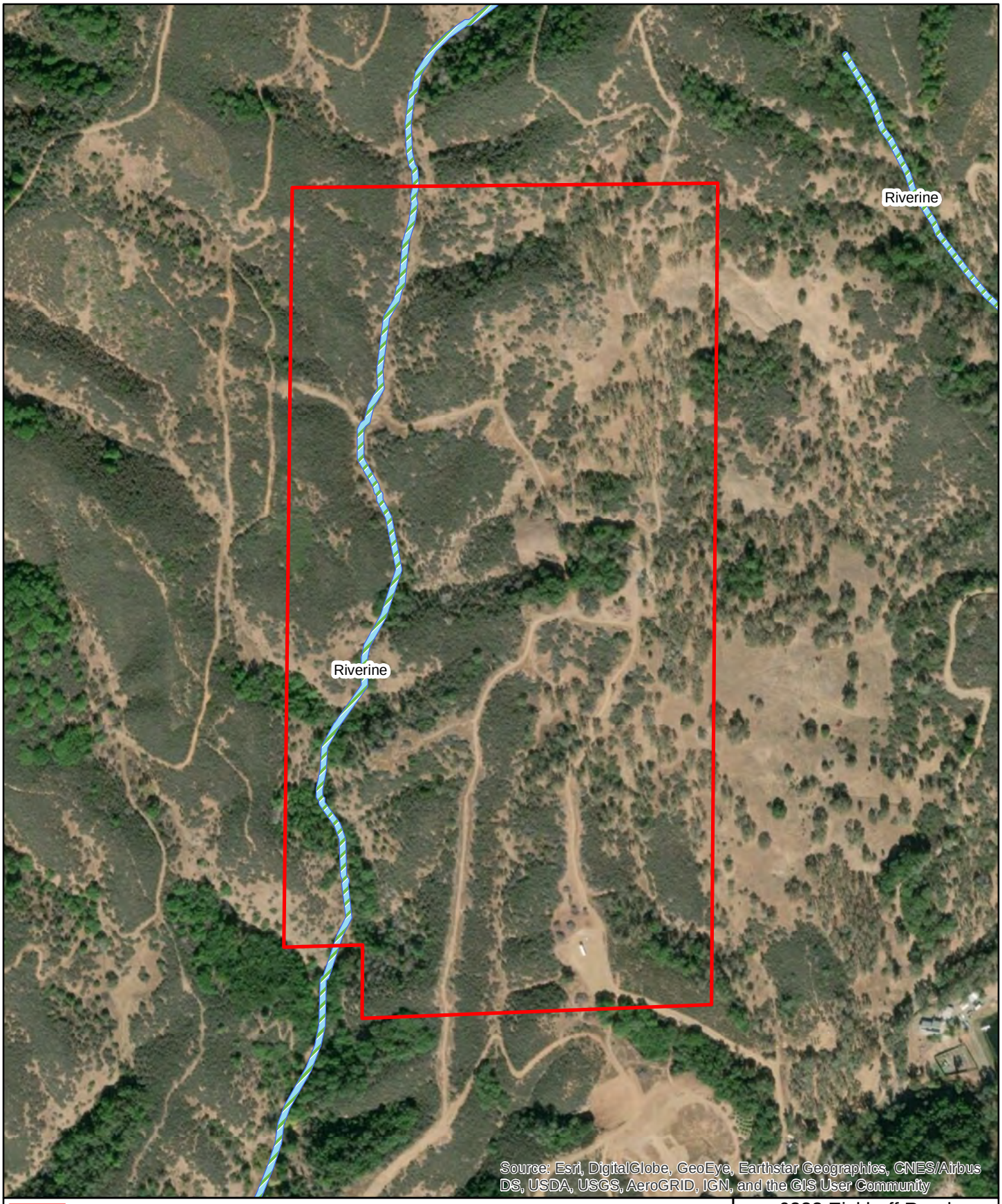
WWW.NATURALINVESTIGATIONS.COM



Water Resources

6233 Eickhoff Road, Lakeport

Natural Investigations Company



Parcel Location

Wetlands and Channels

0 100 200 Meters

0 500 1,000 Feet

1:5,000

6233 Eickhoff Road
National Wetlands Inventory
Features Map

Natural Investigations Company

Map Date 1/29/2020 Lakeport 1958 Quadrangle Photorevised 1978 Minor Revision 1994:Township 15N, Range 10W, Section 26,27

APPENDIX 1: USFWS SPECIES LIST

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To:
Consultation Code: 08ESMF00-2020-SLI-0901
Event Code: 08ESMF00-2020-E-02870
Project Name: 6233 Eickhoff Road

January 29, 2020

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846
(916) 414-6600

Project Summary

Consultation Code: 08ESMF00-2020-SLI-0901

Event Code: 08ESMF00-2020-E-02870

Project Name: 6233 Eickhoff Road

Project Type: ** OTHER **

Project Description: Bio Assessment

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/39.116705173023995N122.95153205474259W

Counties: Lake, CA

Endangered Species Act Species

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Birds

NAME	STATUS
Northern Spotted Owl *Strix occidentalis caurina*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/1123

Amphibians

NAME	STATUS
California Red-legged Frog *Rana draytonii*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/2891
Species survey guidelines:
https://ecos.fws.gov/ipac/guideline/survey/population/205/office/11420.pdf

Fishes

NAME	STATUS
Delta Smelt *Hypomesus transpacificus*	Threatened

There is **final** critical habitat for this species. Your location is outside the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/321

Flowering Plants

NAME	STATUS
Burke's Goldfields *Lasthenia burkei*	Endangered

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/4338

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

APPENDIX 2: CHECKLIST OF PLANTS DETECTED IN THE STUDY AREA

Appendix 2:
Plants Observed During Bio Survey

Common Name	Scientific Name
Yarrow	*Achillea millefolium*
Deer weed	*Acmispon glaber*
Chamise	*Adenostoma fasciculatum*
Maidenhair fern	*Adiantum jordanii*
California buckeye	*Aesculus californica*
Western pearly everlasting	*Anaphalis margaritacea*
Common manzanita	*Arctostaphylos manzanita*
California mugwort	*Artemisia douglasiana*
Narrow-leaved milkweed	*Asclepias fascicularis*
Slender wild oat	*Avena barbata*
Coyote brush	*Baccharis pilularis*
Brodiaea	*Brodiaea sp.*
Ripgut brome	*Bromus diandrus*
Soft chess	*Bromus hordeaceus*
Foxtail brome	*Bromus madritensis*
Sedge	*Carex sp.*
Wedgeleaf ceanothus	*Ceanothus cuneatus*
Maltese star thistle	*Centaurea melitensis*
Yellow star thistle	*Centaurea solstitialis*
Fitch's spikeweed	*Centromadia fitchii*
Birch-leaved mountain mahogany	*Cercocarpus betuloides*
Wavy-leaved soap plant	*Chlorogalum pomeridianum*
Bull thistle	*Cirsium vulgare*
Clarkia	*Clarkia sp.*
Narrow-leaved miner's lettuce	*Claytonia parviflora*
Miner's lettuce	*Claytonia perfoliata*
Creek clematis	*Clematis ligusticifolia*
Dove weed	*Croton setiger*
Hedgehog dogtail grass	*Cynosurus echinoides*
Durango root	*Datisca glomerata*
Bush monkeyflower	*Diplacus aurantiacus*
Canyon live-forever	*Dudleya cymosa*
Medusa-head grass	*Elymus caput-medusae*
Blue wildrye	*Elymus glaucus*
Denseflowered willowherb	*Epilobium densiflorum*
Yerba santa	*Eriodictyon californicum*
Naked buckwheat	*Eriogonum nudum*
Fillaree	*Erodium cicutarium*
Yellow monkeyflower	*Erythranthe guttata*
California fescue	*Festuca californica*
Bedstraw	*Galium sp.*
Hayfield tarplant	*Hemizonia congesta ssp. luzulifolia*
Toyon	*Heteromeles arbutifolia*
Klamath weed	*Hypericum perforatum*
Rush	*Juncus sp.*
Pink honeysuckle	*Lonicera hispidula*
California melic grass	*Melica californica*
Torrey's melic grass	*Melica torreyana*
Coyote mint	*Monardella villosa*

Coffee cliffbrake	*Pellaea andromedifolia*
Penstemon	*Penstemon sp.*
Goldback fern	*Pentagramma triangularis*
Phacelia	*Phacelia sp.*
Popcorn flower	*Plagiobothrys sp.*
Shooting star	*Primula sp.*
California scrub oak	*Quercus berberidifolia*
Blue oak	*Quercus douglasii*
Valley oak	*Quercus lobata*
Interior live oak	*Quercus wislizeni*
Buttercup	*Ranunculus sp.*
Holly-leaved redberry	*Rhamnus ilicifolia*
Skunk bush	*Rhus trilobata*
Curly dock	*Rumex crispus*
Red willow	*Salix laevigata*
Arroyo willow	*Salix lasiolepis*
Blue elderberry	*Sambucus nigra ssp. caerula*
Pacific sanicle	*Sanicula crassicaulis*
Sow thistle	*Sonchus oleraceus*
Stachys	*Stachys sp.*
Purple needlegrass	*Stipa pulchra*
Tall sock destroyer	*Torilis arvensis*
Poison oak	*Toxicodendron diversilobum*
Clover	*Trifolium sp.*
Triplet lily	*Triteleia sp.*
California bay	*Umbellularia californica*
Common mullien	*Verbascum thapsus*
California grape	*Vitis californica*
Smooth mule’s ears	*Wyethia glabra*
Cocklebur	*Xanthium strumarium*

APPENDIX 3: SITE PHOTOS

































































BOTANICAL SURVEY REPORT
FOR THE CULTIVATION PROJECT AT
6233 EICKHOFF ROAD, LAKEPORT, CALIFORNIA

March 15, 2021

Prepared by:

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NATURAL INVESTIGATIONS CO.
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1. PROJECT LOCATION AND DESCRIPTION

Natural Investigations Company conducted a botanical resources assessment for a cannabis cultivation operation on a 78-acre property (APN 003-046-02) at 6233 Eickhoff Road, Lakeport, California (see exhibits).

For the initial project, a 1-acre cultivation compound will be established. Future garden expansion will expand the total cannabis canopy to 4 acres. Ancillary facilities may consist of a greenhouse or hoophouse as well as outbuildings (Conex boxes and sheds) for material and chemical storage and product processing. Dirt access roads connect the cultivation operational areas.

For this assessment, the Project Area was defined as the cultivation compound plus the ancillary facilities, and this 5-acre area was the subject of the impact analysis. The entire 78-acre parcel was defined as the Property. The Property is defined to identify botanical resources adjacent to the Project Area, and is the area subject to potential indirect effects from Project implementation.

2. BIOLOGICAL SETTING

Floristic region/Setting: The Property is located within the Inner North Coast Ranges geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately cold winters. The Property and vicinity is in climate Zone 7, California's Gray Pine Belt, with hot summers and mild but pronounced winters without severe winter cold or high humidity (Brenzel, 2012). The Property has variable topography with hills, ridges, slopes and drainages. Prior to the establishment of this cultivation operation, land use was open space. The surrounding land uses are private estates with open space.

Elevation Range: approximately 1500 feet to 1950 feet above mean sea level

3. URVEY METHODOLOGY

Survey methodology followed the following protocols:

- California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

- U.S. Fish and Wildlife Service. 1996. Guidelines for conducting and reporting botanical inventories for federally listed, proposed and candidate plants. Sacramento Fish and Wildlife Office, Sacramento, California. 2 pp.

- CNPS. 2001. CNPS botanical survey guidelines.

3.1. PRELIMINARY DATA GATHERING AND RESEARCH

Prior to conducting the field survey, the following information sources were reviewed:

- Aerial photography of the Project Area (current and historical)
- United States Geologic Service 7.5 degree-minute topographic quadrangles of the Project Area and vicinity
- USFWS National Wetland Inventory
- USDA Natural Resources Conservation Service soil survey maps
- California Natural Diversity Database (CNDDB), electronically updated monthly by subscription

The following reference sites were visited: Not necessary.

3.2. FIELD SURVEYS

Consulting biologist Tim Nosal, MS. conducted a reconnaissance-level floristic surveys on February 7, 2020 and on March 12, 2021. Weather conditions on February 7, were characterized by mostly clear skies with temperatures ranging from 50-55ºF with winds at approximately 5-10 mph. Weather conditions on March 12 were characterized by clear skies with temperatures ranging from 60-70ºF with winds at approximately 0-5 mph. The pedestrian survey consisted of meandering transects through the project area. The entire Project Area was evaluated for presence of suitable habitat elements for special status plants known to occur in the region (see table). Approximately 2.5 hours were utilized on each survey date to assess the 5-acre Project Area, which was sufficient to fully investigate the site.

Note: The qualifications of the botanical field surveyors and report authors are summarized at the end of this report.

Description of Project Area: Located near the center of the Property, the Project Area is located on gentle slopes with oak woodland, chaparral and disturbed chaparral vegetation. The northern half of the Project Area is located within chaparral that was recently grubbed. The remainder of the Project Area is located in undisturbed oak woodland and chaparral habitat.

Note: A map of the Project Area relative to the project area is shown in the Exhibits.

A variable-intensity pedestrian survey was performed, and modified to account for differences in terrain, vegetation density, and visibility. All visible flora observed were recorded in a field notebook. Survey efforts emphasized the search for any special-status species that had documented occurrences in the CNDDB within the vicinity of the Project Area and those species on the CNPS or USFWS species lists.

Taxa were identified to the taxonomic level necessary to determine whether or not they are a special status plant. When a specimen could not be identified in the field, a photograph was taken and/or a specimen was pressed and identified in the laboratory using a dissecting scope where necessary. Dr. Graening holds the following scientific collection permits: CDFW Scientific Collecting Permit No. SC-006802; and CDFW Plant Voucher Specimen Permit 09004. Tim Nosal holds CDFW Plant Voucher Specimen Permit 2081(a)-16-102-V. Taxonomic determinations were facilitated by referencing museum specimens or by various texts, including the following: Powell and Hogue (1979); Pavlik (1991); (1993); Brenzel (2012); Stuart and Sawyer (2001); Lanner (2002); Sibley (2003); Baldwin et al. (2012); Calflora (2021); CDFW (2021b,c); NatureServe 2021; and University of California at Berkeley (2021a,b).

3.3. MAPPING AND OTHER ANALYSES

The locations of any special-status species or vegetation communities sighted were marked on aerial photographs and/or georeferenced with a geographic positioning system (GPS) receiver. Vegetation community types occurring in the Project Area were mapped on aerial photographs, and information on habitat conditions and the suitability of the habitats to support special-status species was also recorded. Locations of any species' occurrences and sensitive natural community boundaries detected within the Project Area were digitized to produce the final maps. Geographic analyses were performed using geographical information system software (ArcGIS 10, ESRI, Inc.). Vegetation communities (assemblages of plant species growing in an area of similar biological and environmental factors), were classified by Vegetation Series (distinctive associations of plants, described by dominant species and particular environmental setting) using the CNPS Vegetation Classification system (Sawyer and Keeler-

Wolf, 1995). Species' habitat requirements and life histories were identified using the following sources: Baldwin et al. (2012); CNPS (2021), Calflora (2021); CDFW (2021a,b,c); and University of California at Berkeley (2021a,b).

3.4. Previous Studies

The following previous studies have been performed:

- Natural Investigations Co. 2020. Biological Resources Assessment for the Cannabis Cultivation Operation at 6233 Eickhoff Road, Lakeport, California.

3.5. List of Sensitive Natural Communities with Potential to Occur in the Region

The CNDDB reported no special-status habitats within the Project Area or surrounding Property boundary. The CNDDB reported the following special-status habitats in a 10-mile radius outside of the Property: Clear Lake Drainage Cyprinid/Catostomid Stream; Clear Lake Drainage Seasonal Lakefish Spawning Stream; Serpentine Bunchgrass; Coastal and Valley Freshwater Marsh and Northern Interior Cypress Forest.

3.6. List of Special Status Plants with Potential to Occur in the Region

A list of special-status plant species with potential to occur in the region was compiled based upon the following:

- A spatial query of the CNDDB.
- A query of the California Native Plant Society's database *Inventory of Rare and Endangered Plants of California* (online edition).

The databases were queried and any reported occurrences of special-status species were plotted in relation to the Project Area boundary using GIS software (see exhibits). The CNDDB reported no special-status species occurrences within the Project Area or the surrounding Property. Within a 10-mile buffer of the Property boundary, the CNDDB reported several special-status species occurrences, summarized in the Appendix.

3.7. Target Species and Blooming Periods

A list of target species was created from the larger list of special-status plant species with potential to occur in the region. Species were removed if the project area lacked suitable habitat.

Target Species / Taxa and Blooming Periods

Common name *Scientific name*	Blooming period	CRPR	CESA	FESA	Habitat	Microhabitat
Bent-flowered fiddleneck *Amsinckia lunaris*	Mar-Jun	1B.2	None	None	Coastal bluff scrub, Cismontane woodland, Valley and foothill grassland	
Dimorphic snapdragon *Antirrhinum subcordatum*	Apr-Jul	4.3	None	None	Chaparral, Lower montane coniferous forest	sometimes serpentinite
Small-flowered calycadenia *Calycadenia micrantha*	Jun-Sep	1B.2	None	None	Chaparral, Meadows and seeps (volcanic), Valley and foothill grassland	Roadsides, rocky, talus, scree, sometimes serpentinite, sparsely vegetated areas
Bristly leptosiphon *Leptosiphon acicularis*	Apr-Jul	4.2	None	None	Chaparral, Cismontane woodland, Coastal prairie, Valley and foothill grassland	
Cobb Mountain lupine *Lupinus sericatus*	Mar-Jun	1B.2	None	None	Broadleafed upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest	
Mt. Diablo cottonweed *Micropus amphibolus*	Mar-May	3.2	None	None	Broadleafed upland forest, Chaparral, Cismontane woodland, Valley and foothill grassland	rocky
Green monardella *Monardella viridis*	Jun-Sep	4.3	None	None	Broadleafed upland forest, Chaparral, Cismontane woodland	
Beaked tracyina *Tracyina rostrata*	May-Jun	1B.2	None	None	Chaparral, Cismontane woodland, Valley and foothill grassland	
Napa bluecurls *Trichostema ruygtii*	Jun-Oct	1B.2	None	None	Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley and foothill grassland, Vernal pools	
Oval-leaved viburnum *Viburnum ellipticum*	May-Jun	2B.3	None	None	Chaparral, Cismontane woodland, Lower montane coniferous forest	

4. RESULTS

4.1. LIST OF PLANT TAXA DETECTED DURING FIELD SURVEY(S)

All plant taxa detected during the botanical field survey are listed in Appendix 2. During the botanical field survey, no special-status plant taxa were detected within the Project Area.

4.2. LIST OF VEGETATION COMMUNITIES DETECTED DURING FIELD SUVERY(S)

General vegetation communities occurring in the Project Area and surrounding Property boundary were mapped (see Exhibits). More specifically, the following terrestrial natural communities occur in the Project Area (as categorized by CDFW 2019):

- 37.101.12 *Adenostoma fasciculatum – Diplacus aurantiacus*
- 71.020.05 *Quercus douglasii* – grass
- 71.080.44 *Quercus wislizeni – Quercus douglasii/herbaceous*
- 37.101.16 *Adenostoma fasciculatum* (Area of disturbance with resprouting chamise)

Soils within the Property are derived from sandstone and shale parent material. No soils derived from volcanic or serpentine parent materials are present in or adjacent to the Property.

During the botanical field survey, no sensitive vegetation communities were detected within the Project Area.

4.3. Adequacy of Botanical Field Survey(s)

Two botanical surveys (February 7, 2020 and March 12, 2021) were conducted in order to increase the probability of detecting the special status plant species that may occur within the Project Area.

Although these dates fall outside of the blooming period for some of the plants that could potentially occur, perennial plants were readily identifiable and dried stems from last season's plants and basal leaves from this season's plants are visible and can be identified to the taxonomic level of genus.

Although three genera of special status species likely to occur within the Project Area were identified during the two surveys, these were identified as common species: miniature lupine (*Lupinus bicolor*), slender cottonweed (*Micropus californicus*) and coyote mint (*Monardella villosa*).

No species of fiddleneck (*Amsinckia*), snapdragon (*Antirrhinum*), calycadenia (*Calycadenia*), leptosiphon (*Leptosiphon*), tracynia (*Tracyina*), bluecurls (*Trichostema*) or viburnum (*Viburnum*) were observed within the Project Area or surrounding Property.

5. POTENTIAL PROJECT IMPACTS

No special status plant populations have been reported in or near the Property. The nearest reported special status plant population is approximately 2 miles southwest of the Property. No direct or indirect impacts to special-status plants were identified from project implementation. No special-status habitats were detected within the Project Area.

The proposed project will result in the loss of up to 5 acres of chaparral and oak woodland habitat. These habitats are common throughout Lake County. Loss of this habitat will not significantly reduce the available habitat for special status plant species.

6. MITIGATIONS MEASURES / RECOMMENDATIONS

No further botanical field surveys are recommended

7. QUALIFICATIONS OF BOTANICAL FIELD SURVEYORS AND REPORT AUTHORS

G.O. GRAENING, Ph.D., M.S.E.

Dr. Graening holds a PhD in Biological Sciences and a Master of Science in Biological and Agricultural Engineering. Dr. Graening is an adjunct Professor at California State University at Sacramento, and is an active researcher in the area of conservation biology and groundwater ecology; his publication list is available online at http://www.csus.edu/indiv/g/graeningg/pubs.htm. Dr. Graening is also a Certified Arborist (ISA # WE-6725A). Dr. Graening has 16 years of experience in environmental assessment, including previous employment with The Nature Conservancy, Tetra Tech Inc., and CH2M Hill, Inc.

TIMOTHY R. D. NOSAL, M.S.

Mr. Nosal holds a B.S. and M.S. in Biological Sciences. Mr. Nosal has statewide experience performing sensitive plant and animal surveys in addition to terrestrial vegetation investigations. Mr. Nosal has over 25 years of experience in botanical surveys, environmental assessment, and teaching with employers that include California Department of Fish and Wildlife, State Water Resources Control Board, American River College, MTI College and Pacific Municipal Consultants.

Mr. Nosal's experience with the flora of the Lake County region includes numerous botanical field surveys for associated Biological Studies on properties located in the county.

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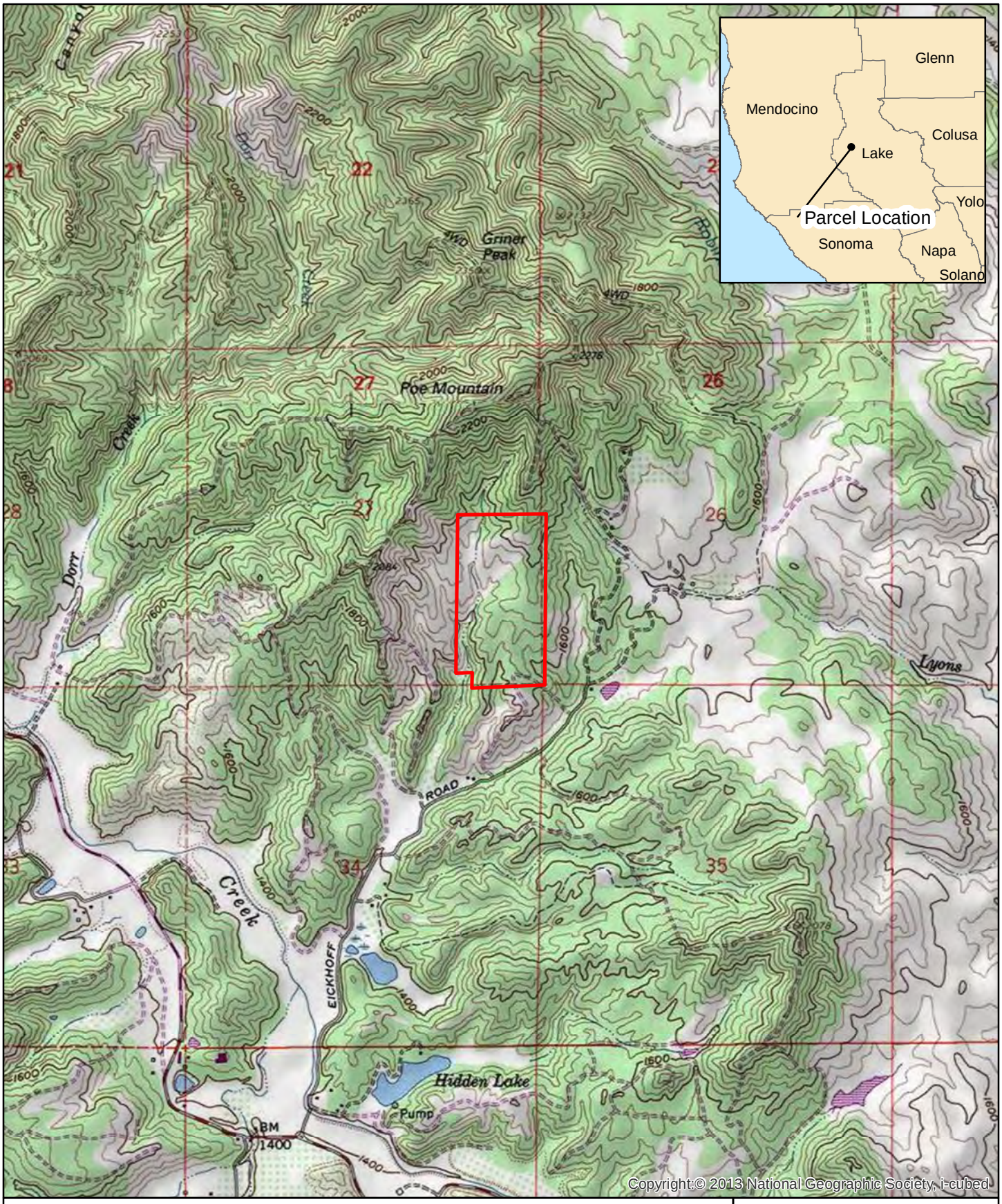
EXHIBITS



Parcel Location

0 0.5 1 Kilometers

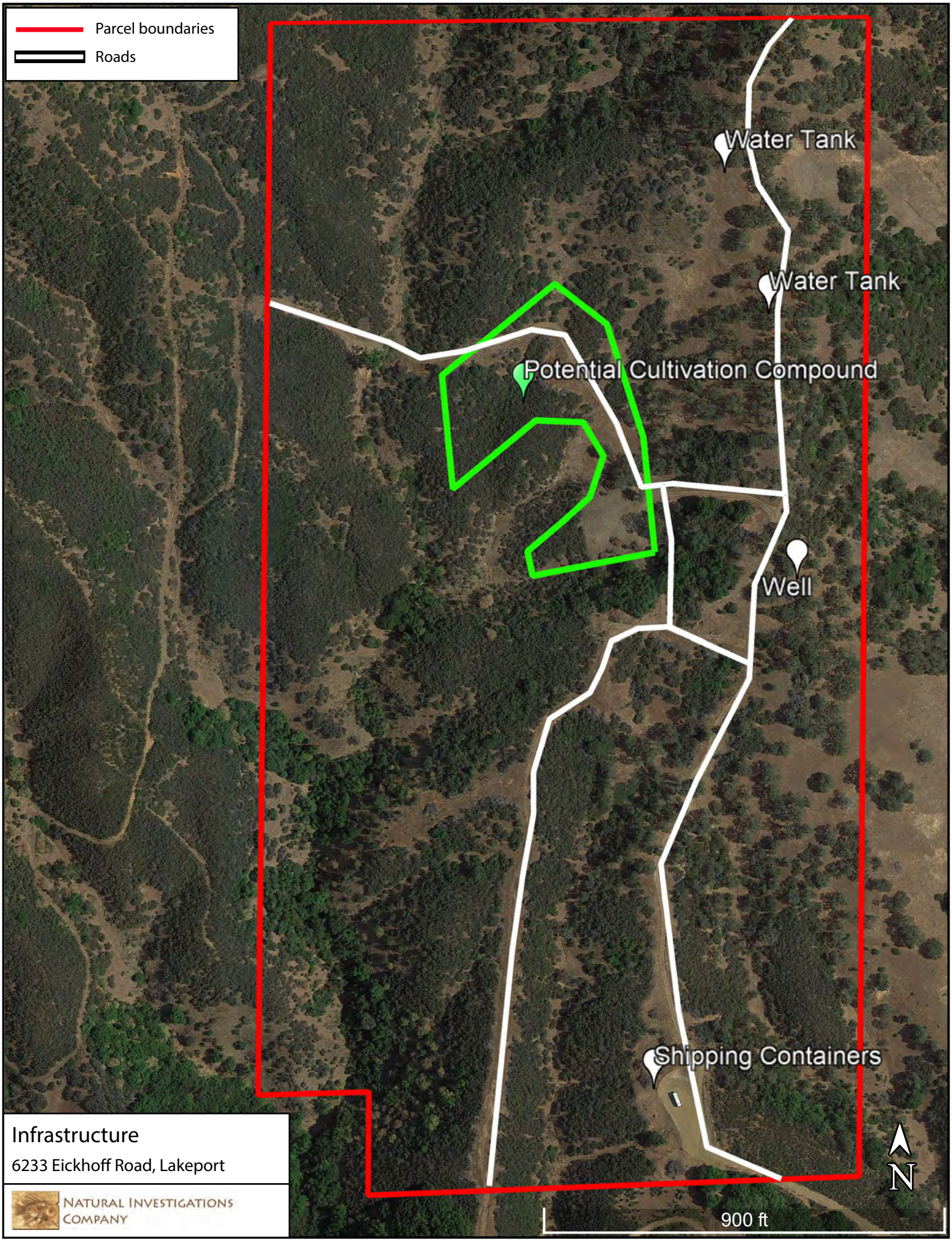
0 0.5 1 Miles

1:24,000

6233 Eickhoff Road
Parcel Location Map

NATURAL INVESTIGATIONS COMPANY

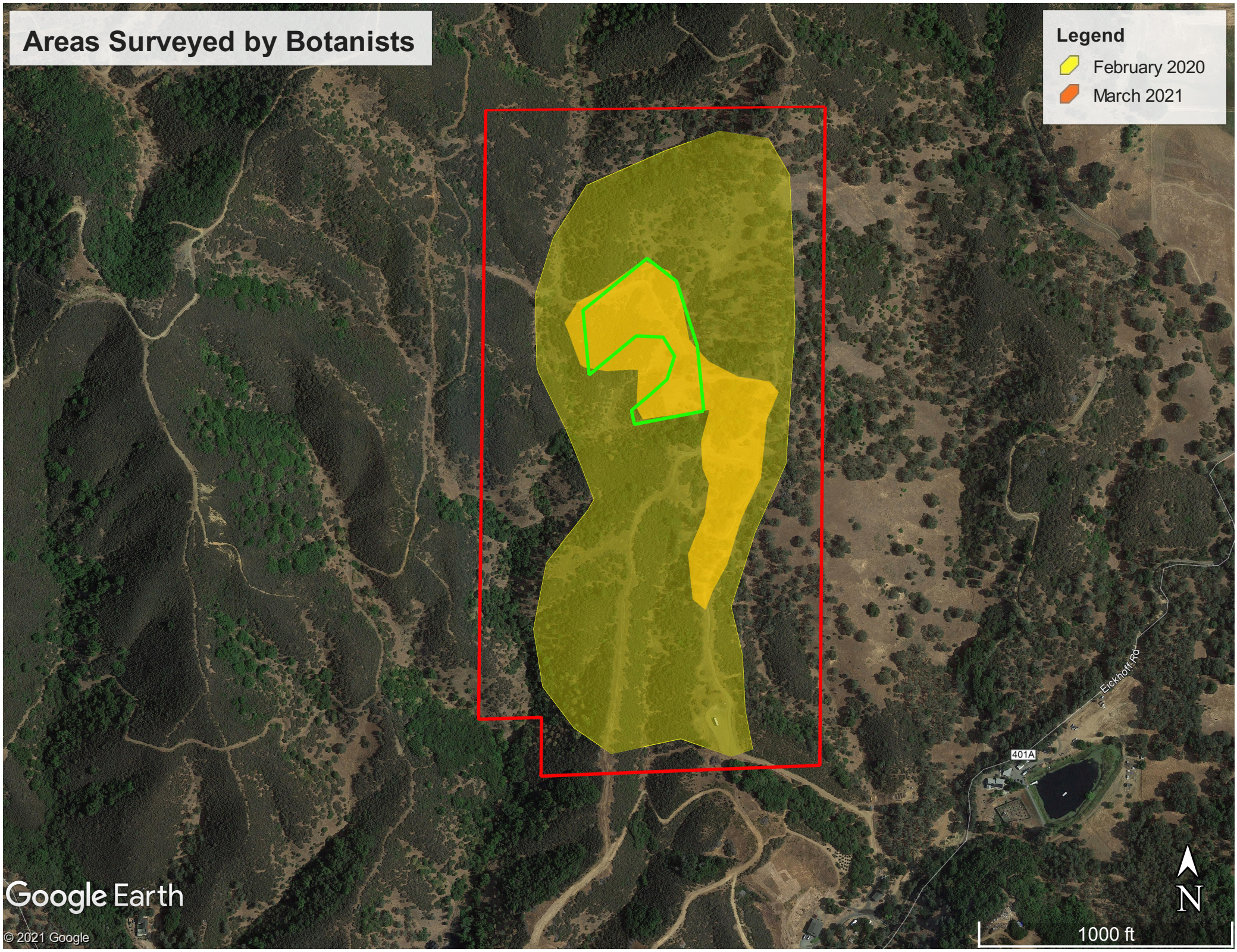
Map Date 1/29/2020 Lakeport 1958 Quadrangle Photorevised 1978 Minor Revision 1994:Township 15N, Range 10W, Section 26,27

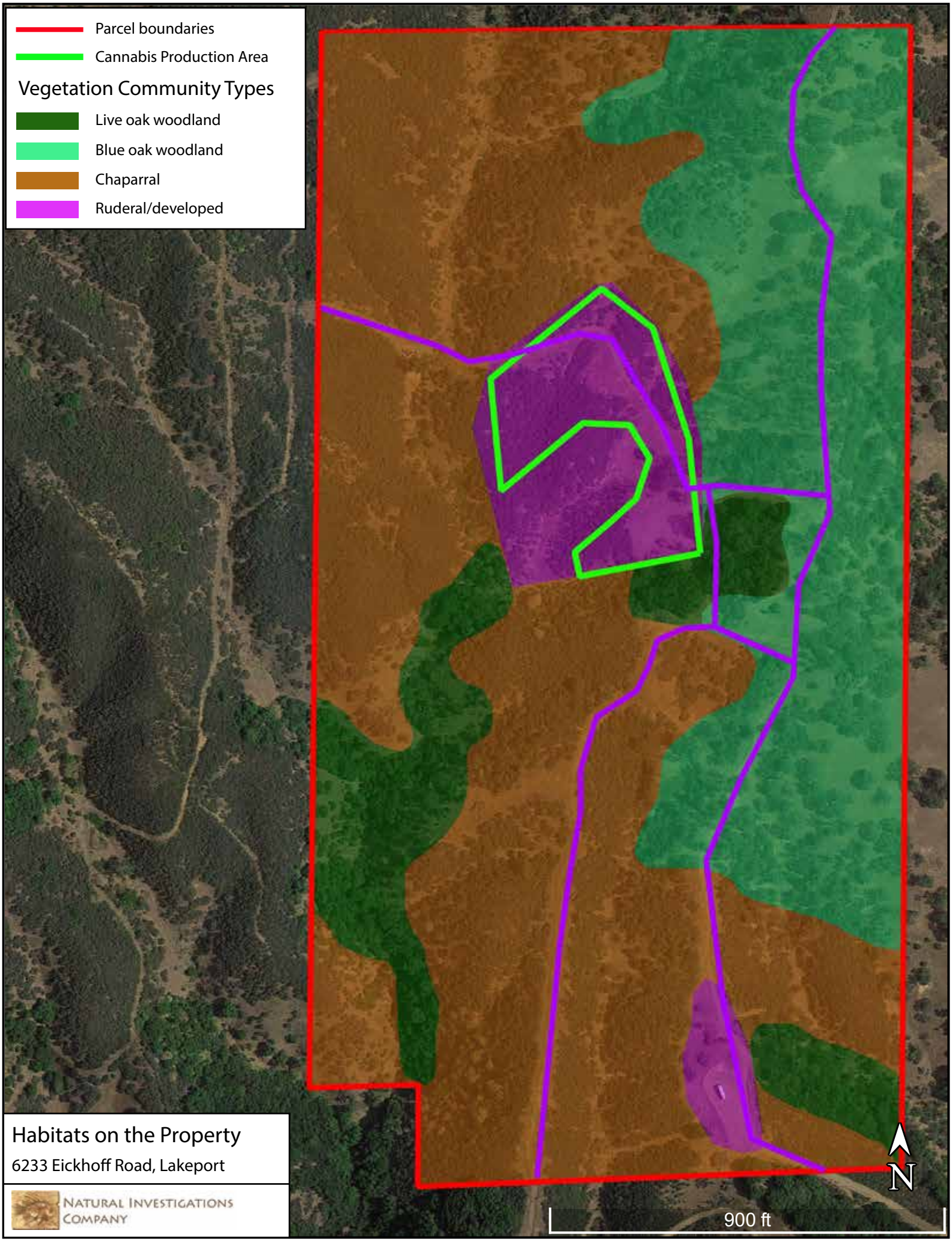


Infrastructure

6233 Eickhoff Road, Lakeport

Natural Investigations Company

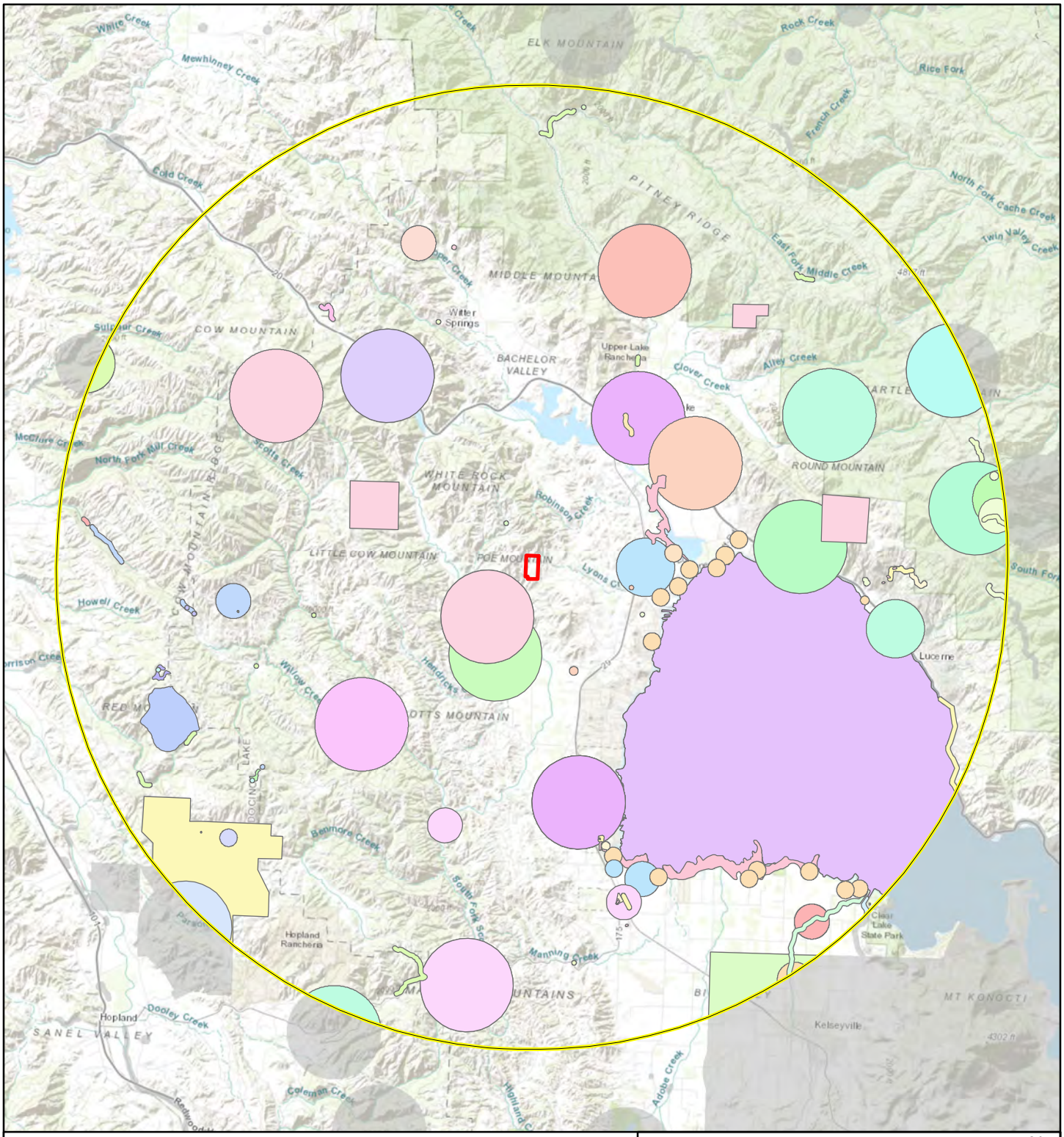

Areas Surveyed by Botanists
Legend
February 2020
March 2021
Eickhoff Rd
401A
N
1000 ft
Google Earth
© 2021 Google



Habitats on the Property

6233 Eickhoff Road, Lakeport

Natural Investigations Company



Notes:
1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist inshowing features discussed in an attached document. Natural Investigations Company can not guarantee the accuracy and content of electronic files.The master file is stored by Natural Investigations Company and will serve as the official record of this communication.
3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.Data Sources: California Department of Fish and Wildlife. 2020. RareFind 5.x, California Natural Diversity Data Base. Biogeographic Data Branch, Sacramento, California.
(updated monthly by subscription service)

Special-Status Species Occurrences Map

6233 Eickhoff Road

Lakeport 1958 Quadrangle Photorevised 1978 Minor Revision 1994: Township 15N, Range 10W, Section 26,27

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APPENDIX: CNDDB SPECIES LIST

Common Name Scientific Name	Status*	General Habitat	Microhabitat
Toren's grimmia *Grimmia torenii*	1B.3	Cismontane woodland, lower montane coniferous forest, chaparral.	Openings, rocky, boulder and rock walls, carbonate, volcanic. 325-1160 m.
Small-flowered calycadenia *Calycadenia micrantha*	1B.2	Chaparral, valley and foothill grassland, meadows and seeps.	Rocky talus or scree; sparsely vegetated areas. Occasionally on roadsides; sometimes on serpentine. 5-1500 m.
Colusa layia *Layia septentrionalis*	1B.2	Chaparral, cismontane woodland, valley and foothill grassland.	Scattered colonies in fields and grassy slopes in sandy or serpentine soil. 145-1095m.
Beaked tracyina *Tracyina rostrata*	1B.2	Cismontane woodland, valley and foothill grassland.	Open grassy meadows within oak woodland and grassland habitats. 90-790 m.
Bent-flowered fiddleneck *Amsinckia lunaris*	1B.2	Cismontane woodland, valley and foothill grassland.	50-500m.
Serpentine cryptantha *Cryptantha dissita*	1B.2	Chaparral.	Serpentine outcrops. 330-730m.
Mayacamas popcornflower *Plagiobothrys lithocaryus*	1A	Meadows? Valley and foothill grassland, cismontane woodland, chaparral?	Moist sites. 285-450m.
Hoffman's bristly jewelflower *Streptanthus glandulosus ssp. hoffmanii*	1B.3	Chaparral, cismontane woodland, valley and foothill grassland.	Moist, steep rocky banks, in serpentine and non-serpentine soil. 120-475m.
Watershield *Brasenia schreberi*	2B.3	Freshwater marshes and swamps.	Aquatic from water bodies both natural and artificial in California.
Raiche's manzanita *Arctostaphylos stanfordiana ssp. raichei*	1B.1	Chaparral, lower montane coniferous forest.	Rocky, serpentine sites. Slopes and ridges. 450-1000 m.
Konocti manzanita *Arctostaphylos manzanita ssp. elegans*	1B.3	Chaparral, cismontane woodland, lower montane coniferous forest.	Volcanic soils. 395-1615 m.
Anthony Peak lupine *Lupinus antoninus*	1B.2	Upper montane coniferous forest, lower montane coniferous forest.	Open areas with surrounding forest; rocky sites. 1220-2285 m.
Glandular western flax *Hesperolinon adenophyllum*	1B.2	Chaparral, cismontane woodland, valley and foothill grassland.	Serpentine soils; generally found in serpentine chaparral. 150-1315 m.
Two-carpellate western flax *Hesperolinon bicarpellatum*	1B.2	Serpentine chaparral.	Serpentine barrens at edge of chaparral. 60-1005 m.
Small groundcone *Kopsiopsis hookeri*	2B.3	North coast coniferous forest.	Open woods, shrubby places, generally on gaultheria shallon. 90-885 m.
Rincon Ridge ceanothus *Ceanothus confusus*	1B.1	Closed-cone coniferous forest, chaparral, cismontane woodland.	Known from volcanic or serpentine soils, dry shrubby slopes. 75-1065 m.
Bolander's horkelia *Horkelia bolanderi*	1B.2	Lower montane coniferous forest, chaparral, meadows, valley and foothill grassland.	Grassy margins of vernal pools and meadows. 450-1100 m.
Boggs Lake hedge-hyssop *Gratiola heterosepala*	CE/1B.2	Marshes and swamps (freshwater), vernal pools.	Clay soils; usually in vernal pools, sometimes on lake margins. 10-2375 m.
Bristly sedge *Carex comosa*	2B.1	Marshes and swamps.	Lake margins, wet places; site below sea level is on a delta island. -5-1005m.

*Status Codes:
**Copied verbatim from CNDDB, unless otherwise noted.

APPENDIX: LIST OF PLANT TAXA DETECTED IN THE PROJECT AREA AND IMMEDIATE VICINITY

A list of all plant taxa occurring in the project area, with all taxa identified to the taxonomic level necessary to determine whether or not they are a special status plant;

Plants Observed at 6233 Eickhoff Road, Lakeport on February 7, 2020 and March 12, 2021

Common Name	Scientific Name
Yarrow	*Achillea millefolium*
Deer weed	*Acmispon glaber*
Hill lotus	*Acmispon parviflorus*
Lotus	*Acmispon sp.*
Chamise	*Adenostoma fasciculatum*
Maidenhair fern	*Adiantum jordanii*
California buckeye	*Aesculus californica*
Scarlet pimpernel	*Anagallis arvensis*
Pearly everlasting	*Anaphalis margaritacea*
Western lady's mantle	*Aphanes occidentalis*
Common manzanita	*Arctostaphylos manzanita ssp. manzanita*
Whiteleaf manzanita	*Arctostaphylos viscida ssp. viscida*
California mugwort	*Artemisia douglasiana*
Narrow-leaved milkweed	*Asclepias fascicularis*
Slender wild oat	*Avena barbata*
Coyote brush	*Baccharis pilularis*
Field mustard	*Brassica rapa*
Brodiaea	*Brodiaea sp.*
Ripgut brome	*Bromus diandrus*
Soft chess	*Bromus hordeaceus*
Foxtail brome	*Bromus madritensis*
Red maids	*Calandrinia ciliata*
Western bittercress	*Cardamine oligosperma*
Italian thistle	*Carduus pycnocephalus*
Sedge	*Carex sp.*
Wedgeleaf ceanothus	*Ceanothus cuneatus*
Wavy leaved ceanothus	*Ceanothus foliosus*
Maltese star thistle	*Centaurea melitensis*
Yellow star thistle	*Centaurea solstitialis*
Fitch's spikeweed	*Centromadia fitchii*
Common mouse-eared chickweed	*Cerastium fontanum*
Birch-leaved mountain mahogany	*Cercocarpus betuloides*
Wavy leaf soap plant	*Chlorogalum pomeridianum*
Thistle	*Cirsium sp.*
Bull thistle	*Cirsium vulgare*
Clarkia	*Clarkia sp.*
Narrow leaved miner's lettuce	*Claytonia parviflora*
Miner's lettuce	*Claytonia perfoliata*
Creek clematis	*Clematis ligusticifolia*
Dove weed	*Croton setiger*
Pacific houndstooth	*Cynoglossum grande*

Dogtail grass	*Cynosurus echinoides*
Durango root	*Datisca glomerata*
Bush monkeyflower	*Diplacus aurantiacus*
Congdon's monkeyflower	*Diplacus congdonii*
Purple mouse ears	*Diplacus douglasii*
Canyon live-forever	*Dudleya cymosa*
Medusa-head grass	*Elymus caput-medusae*
Blue wildrye	*Elymus glaucus*
Whispering bells	*Emmenanthe penduliflora*
Tall willowherb	*Epilobium brachycarpum*
Denseflowered willowherb	*Epilobium densiflorum*
Yerba santa	*Eriodictyon californicum*
Naked buckwheat	*Eriogonum nudum*
Broad leaved filaree	*Erodium botrys*
Fillaree	*Erodium cicutarium*
Yellow monkeyflower	*Erythranthe guttata*
California fescue	*Festuca californica*
Bedstraw	*Galium aparine*
Bedstraw	*Galium sp.*
Nit grass	*Gastridium phleoides*
Cutleaf geranium	*Geranium dissectum*
Dove's foot geranium	*Geranium molle*
Hayfield tarplant	*Hemizonia congesta ssp. luzulifolia*
Toyon	*Heteromeles arbutifolia*
Goldwire	*Hypericum concinnum*
Klamath weed	*Hypericum perforatum*
Smooth cat's-ear	*Hypochaeris glabra*
Rush	*Juncus sp.*
California goldfields	*Lasthenia californica*
Woolyfruit desert parsley	*Lomatium dasycarpum*
Pink honeysuckle	*Lonicera hispidula*
Chaparral honeysuckle	*Lonicera interrupta*
Miniature lupine	*Lupinus bicolor*
Pacific woodrush	*Luzula comosa*
California melic grass	*Melica californica*
Torrey's melic grass	*Melica torreyana*
Slender cottonweed	*Micropus californicus*
Coyote mint	*Monardella villosa*
Skunkweed	*Navarretia squarrosa*
Baby blue eyes	*Nemophila menziesii*
Coffee cliffbrake	*Pellaea andromedifolia*
Foothill penstemon	*Penstemon heterophyllus*
Penstemon	*Penstemon sp.*
Goldback fern	*Pentagramma triangularis*
Rock phacelia	*Phacelia egena*

Phacelia	*Phacelia sp.*
Rusty popcorn flower	*Plagiobothrys nothofulvus*
Popcorn flower	*Plagiobothrys sp.*
Henderson's shooting star	*Primula hendersonii*
California scrub oak	*Quercus berberidifolia*
Blue oak	*Quercus douglasii*
Valley oak	*Quercus lobata*
Interior live oak	*Quercus wislizeni var. wislizeni*
Buttercup	*Ranunculus sp.*
Holly-leaved redberry	*Rhamnus ilicifolia*
Fragrant sumac	*Rhus aromatica*
Curly dock	*Rumex crispus*
Red willow	*Salix laevigata*
Arroyo willow	*Salix lasiolepis*
Blue elderberry	*Sambucus nigra ssp. caerula*
Poison sanicle	*Sanicula bipinnata*
Purple sanicle	*Sanicula bipinnatifida*
Pacific sanicle	*Sanicula crassicaulis*
Coastal snakeroot	*Sanicula laciniata*
Old man of spring	*Senecio vulgare*
Field madder	*Sherardia arvensis*
Sidalcea	*Sidalcea sp.*
Milk thistle	*Silybum marinum*
Sow thistle	*Sonchus oleraceus*
Stachys	*Stachys sp.*
Purple needlegrass	*Stipa pulchra*
Needlegrass	*Stipa sp.*
Everlasting neststraw	*Stylocline gnaphaloides*
Common snowberry	*Symphoricarpos albus*
Fringepod	*Thysanocarpus curvipes*
Tall sock-destroyer	*Torilis arvensis*
Poison oak	*Toxicodendron diversilobum*
Clover	*Trifolium sp.*
Triplet lily	*Triteleia sp.*
California bay	*Umbellularia californica*
Annual stinging nettle	*Urtica urens*
Common mullein	*Verbascum thapsus*
California grape	*Vitis californica*
Smooth mule's ears	*Wyethia glabra*
Cocklebur	*Xanthium strumarium*