Exhibit D

Biological Resource Assessment

for

Allegretto Resort Expansion

APN 025-410-004

City of El Paso de Robles, California

Prepared for

Ayres Group
355 Bristol Street, Suite A
Costa Mesa, CA 92626

by

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This Biological Resource Assessment was prepared according to the Guidelines established by the County of San Luis Obispo Department of Planning and Building (2016) and the statements furnished in the report and associated maps are true and correct to the best of my knowledge and belief.

Raymond M. Danner — Signature

3/24/25, 12/17/25 — Date

Signature

3/24/25 — Date

Lynne Dee Althouse — Signature

3/24/25 — Date

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Cover Page: Blue oak tree on the eastern part of the site. March 3, 2025.

SYNOPSIS

- This report focuses on biological resources at a 10.8-acre addition to the existing Allegretto Resort in Paso Robles, San Luis Obispo County, California. The Study Area encompasses a portion of Assessor's Parcel Number (APN) 025-410-004, currently owned by Cuesta College.
- The proposed Allegretto Resort Expansion would expand an existing 172-room resort to provide 93 additional guest rooms as well as additional resort amenities including a spa, gym, conference center, restaurant, wine education, parking areas, and other associated uses.
- Habitat type identified in the 10.8 acres is California annual grassland.
- A botanical survey in March 2025 identified 29 species, subspecies, and varieties of vascular plants in the Study Area. Two special status plants have low potential to occur in the Study Area. No special status plants were observed. Two blue oaks occur in the eastern portion of the Study Area.
- A wildlife survey in March 2025 focused on eight special status animals with some potential to occur in the Study Area. No special status animals were observed in the Study Area.
- Mitigation recommendations are provided to reduce potential impacts to sensitive biological resources.
- Spring surveys for special status plants and animals will be conducted in April 2025 and will include aquatic surveys for western spadefoot in manmade ponded landscape features on the existing Allegretto Resort.

1 INTRODUCTION

1.1 Purpose

This report provides information regarding biological resources associated with the proposed Allegretto Resort Expansion (Project), at 2700 Buena Vista Drive, Paso Robles, San Luis Obispo County, California (Study Area). Results include a habitat assessment, botanical and wildlife inventory, a discussion of special status species that have potential to occur in the Study Area, and an analysis of potential impacts to biological resources from the proposed Project. Mitigation recommendations for potential impacts to biological resources are also provided.

1.2 Project Location

The Study Area is a 10.8-acre portion of an approximate 75.8-acre parcel, APN 025-410-004, located along the northern border of the City of El Paso de Robles (City), in a developed area of San Luis Obispo County (Figure 1). The center of the Property is 35.648484°N, 120.668477°W (WGS84) in the *Paso Robles* United States Geological Survey (USGS) 7.5-minute topographic quadrangle.

1.3 Local and Regional Context

The Study Area is approximately 1.8 miles northeast of downtown Paso Robles, within the limits of the City (Figure 2). The Study Area is within the Salinas River Watershed, approximately 0.7 miles east of the Salinas River, and 0.8 miles southwest of Huerhuero Creek. The Property is zoned Public Facilities. Elevations within the site are generally flat with an average of 794 feet above mean sea level. State Route 46 is approximately 0.2 miles south of the Study Area. Dallons Drive creates the northern and eastern borders of the Study Area, and Buena Vista Drive borders the western portion. Cuesta College North County Campus is adjacent to the Study Area on the north side of Dallons Drive, and Allegretto Vineyard Resort is directly south of the Study Area. There are residential areas to the west and southeast of the Study Area. Local residents use the area to play fetch with their dogs.

1.4 Project Description

The Project would expand Allegretto Vineyard Resort with an additional 93 hotel rooms, a spa, a conference center, a restaurant, and a wine production/classroom building. The project would create new parking areas and pathways, extend existing infrastructure (water systems, drainage, etc.), and provide landscaping. The expansion would include 10.8 acres of land purchased from Cuesta College and property rezone determination by the City to align with the resort's current zoning. The Project would amend Planned Development 12-001 and Conditional Use Permit 12-003 to incorporate the new property into the resort.

A Site Plan is provided in Appendix A, for reference.

Contact information for the project property owner, biological consultant, project engineer, and lead agency are provided in Table 1.

TABLE 1. RESPONSIBLE PARTIES

Property Owner	Project Engineer
Ayres Group 355 Bristol Street, Suite A Costa Mesa, CA 92626 (714) 540-6060 Douglas Ayres doug@ayresgroup.net	North Coast Engineering, Inc. 725 Creston Road, Suite B San Luis Obispo, CA 93446 (805) 239-3127
Biological Consultant	**Lead Agency**
Althouse and Meade, Inc. 1650 Ramada Drive, Suite 180 Paso Robles, CA 93446 (805) 237-9626 Raymond Danner, Associate Principal ray@althouseandmeade.com	City of El Paso de Robles Department of Planning 1000 Spring Street Paso Robles, CA 93446 (805) 237-3970

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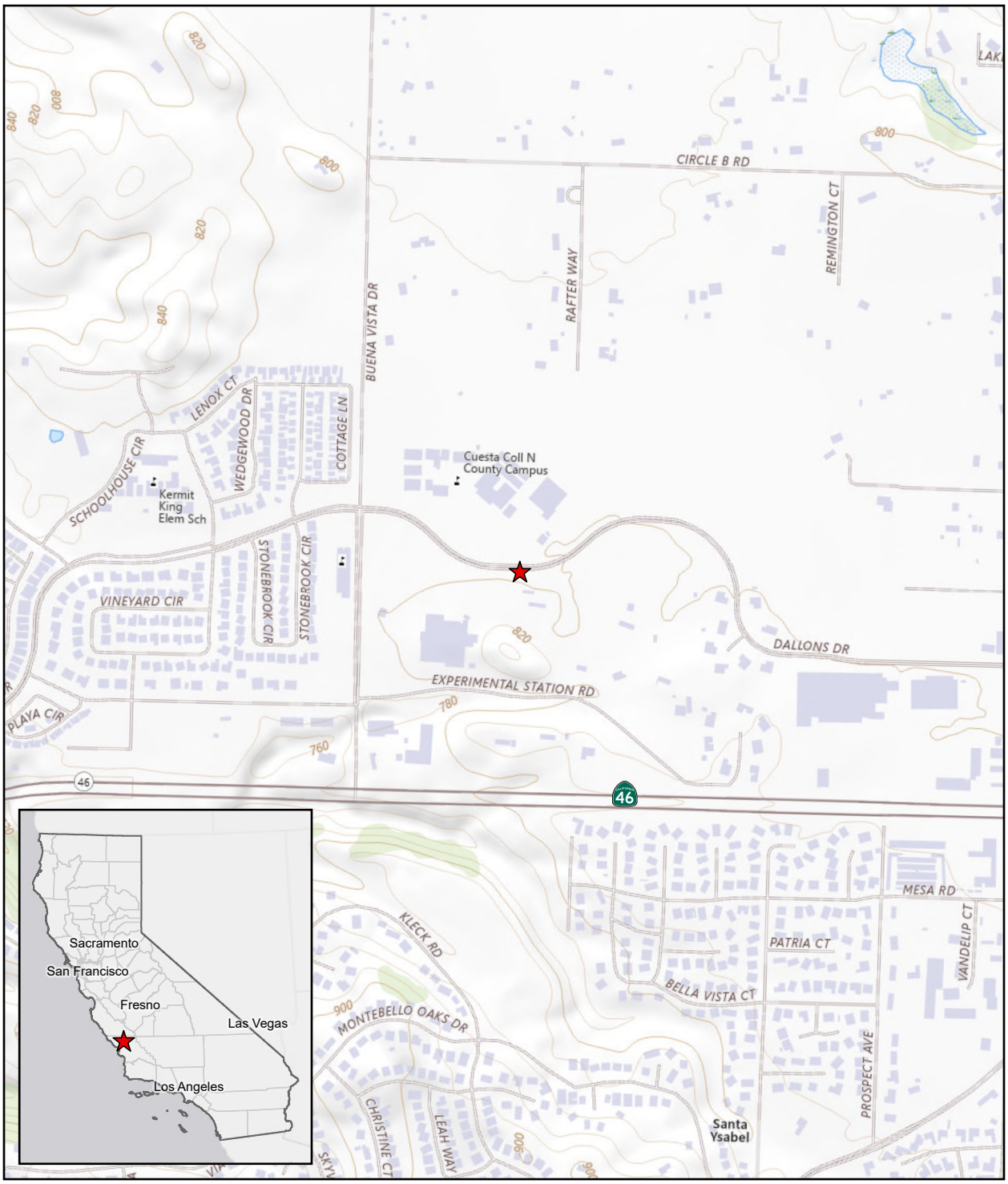
Figure 1. United States Geological Survey Topographic Map



Legend

★ Project Location

N

0 500 1,000 Feet

Allegretto Resort Expansion
Map Center: 35.64812°N 120.66911°W
Paso Robles, San Luis Obispo County

USGS Quadrangle: Paso Robles

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Map Updated:
March 19, 2025 09:16 AM by SS

Exhibit D

Figure 2. Aerial

Legend

Study Area (10.8 acres)

N

0 200 400 Feet

Allegretto Resort Expansion
Map Center: 35.64897°N 120.66829°W
Paso Robles, San Luis Obispo County

Imagery Source: USDA NAIP, 09/23/2024

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Map Updated:
March 21, 2025 01:16 PM by SS

1.5 Regulatory Framework

Standards for environmental protection, in the form of laws and regulations, are created within three different organizational levels of government: Federal, State, and Local. Entities exist within each level to create and enforce regulations that help ensure protection of specific and pertinent regional issues threatening ecosystems and environments. The following regulations are applicable to the proposed Project.

1.5.1 Federal Law and Regulations

Bald and Golden Eagle Protection Act. The Bald and Golden Eagle Protection Act (BGEPA) prohibits anyone, without a permit issued by the Secretary of the Interior, from taking (pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb) bald or golden eagles, including their parts, nests, or eggs. This includes substantially interfering with normal breeding, feeding, or sheltering behavior. Activities that may result in the take of a bald or golden eagle require permits; the three activities eligible for permits include to remove or relocate an eagle nest; to transport, exhibit, collect, or control eagles or eagle parts, and for incidental take of eagles.

Endangered Species Act. The federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) identified as being endangered or threatened with extinction. "Critical Habitat" is a term within the FESA designed to guide actions by federal agencies and is defined as "an area occupied by a species listed as threatened or endangered within which are found physical or geographical features essential to the conservation of the species, or an area not currently occupied by the species which is itself essential to the conservation of the species." Actions that jeopardize endangered or threatened species and/or critical habitat are considered a 'take' under the FESA. "Take" under federal definition means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.

Projects that would result in "take" of any federally listed threatened or endangered species, or critical habitats, are required to obtain permits from the USFWS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of FESA, depending on the involvement by the federal government in permitting and/or funding of the project. Through Section 10, it is required to prepare a Habitat Conservation Plan (HCP) to be approved by the United States Fish and Wildlife Service (USFWS), which results in the issuance of an Incidental Take Permit (ITP). Through Section 7, which can only occur when a separate federal nexus in a project exists (prompting interagency consultation), a consultation by the various federal agencies involved can take place to determine appropriate actions to mitigate negative effects on endangered and threatened species and their habitat.

Migratory Bird Treaty Act. All migratory, non-game bird species that are native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13), as amended under the Migratory Bird Treaty Reform Act of 2004. The MBTA makes it illegal to purposefully take (pursue, hunt, shoot, wound, kill, trap, capture, or collect) any migratory bird, or the parts, nests, or eggs of such a bird, except under the terms of a valid Federal permit. Migratory non-game native bird species are protected by international treaty under the federal MBTA.

1.5.2 State Law and Regulations

California Endangered Species Act. The California Endangered Species Act (CESA), similar to FESA, contains a process for listing of species and regulating potential impacts to listed species. State threatened and endangered species include both plants and wildlife, but do not include invertebrates. The designation "rare species" applies only to California native plants. State threatened and endangered plant species are regulated largely under the Native Plant Preservation Act in conjunction with the CESA. State threatened and endangered animal species are legally protected against "take." The CESA authorizes the California Department of Fish and Wildlife (CDFW) to enter into a memorandum of agreement for take of listed species to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met. Section 2080 of the CESA prohibits the take of species listed as threatened or endangered pursuant to the Act. Section 2081 allows CDFW to authorize take prohibited under Section 2080 provided that: 1) the taking is incidental to an otherwise lawful activity; 2) the taking will be minimized and fully mitigated; 3) the applicant ensures adequate funding for minimization and mitigation; and 4) the authorization will not jeopardize the continued existence of the listed species.

California Environmental Quality Act (CEQA). CEQA defines a "project" as any action undertaken from public or private entity that requires discretionary governmental review (a non-ministerial permittable action). All "projects" are required to undergo some level of environmental review pursuant to CEQA, unless an exemption applies. CEQA's environmental review process includes an assessment of existing resources, broken up by categories (i.e., air quality, aesthetics, etc.), a catalog of potential impacts to those resources caused by the proposed project, and a quantifiable result determining the level of significance an impact would generate. The goal of environmental review under CEQA is to avoid or mitigate impacts that would lead to a "significant effect" on a given resource; section 15382 of the CEQA Guidelines defines a "significant effect" as

> *a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.*

Public agencies are required to implement CEQA and execute jurisdiction to determine when applicable activities are or are not subject to CEQA. A public agency with the most prominent nexus and jurisdiction to a project is called the lead agency. The lead agencies determine the scope of what is considered an impact and what constitutes a "significant effect". "Biological resources" is one of the varying categories considered during environmental review through CEQA. A lead agency can require a biological assessment to be prepared to report on existing biological resources and recommended mitigation measures that will reduce or lessen potential negative impacts to those biological resources. The questions listed in CEQA's Appendix G: Biological Resources section, which are used to guide assessment of impacts to biological resources are as follows:

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

- *Does 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?*
- *Does 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?*
- *Does the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Does 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?*

The lead agency has the final determination over whether a project is or is not permissible, based upon the environmental review, completed requirements and environmental documentation, and their judgement that the project will not have a significant effect on the environment, or that all significant effects have been mitigated for.

Natural Community Conservation Planning (NCCP) Act of 1991. The NCCP Act is designed to conserve natural communities at the ecosystem scale while accommodating compatible land use. CDFW is the primary state agency that implements the NCCP. The NCCP plan provides for the comprehensive management and conservation of multiple wildlife species. It identifies and provides for regional protection of natural wildlife diversity while allowing for compatible and appropriate development and growth.

California Fish and Game Code (CFGC). The California Fish and Game Code (CFGC) is one of the many legal codes that form the general statutory law of California. A myriad of statutes regarding fish and game are specified in the CFGC; the following codes are specifically relevant to the proposed Project:

California Native Plant Protection Act. Sections 1900-1913 of the CFGC contain the regulations of the Native Plant Protection Act of 1977. The intent of this act is to help conserve and protect rare and endangered plants in the state. The act allowed the CFGC to designate plants as rare or endangered.

Nesting Birds. Sections 3503, 3503.5 and 3513 of the CFGC states that it is "unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto," and "unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird" unless authorized.

1.5.3 Local Policies and Regulations

Oak Tree Preservation Ordinance. The Oak Tree Preservation Ordinance (City 2002) provides policies, regulations, and specifications necessary to govern the preservation of oak trees within the City and to control their pruning and/or removal. The provisions apply to private property owners, to tree maintenance services and arborists, and to new development, redevelopment, and any discretionary considerations by the City that result in development of intensities that could impact existing oak trees. Preservation of existing oak trees and opportunities to promote the establishment of new oak trees is considered for development projects or development related entitlements.

Pursuant to the City's Oak Tree Preservation Ordinance oak tree protection measures are for trees measured at six inches or greater in diameter at 4.5 feet above ground level [diameter at breast height (dbh)]. Any oak tree slated for removal requires a permit and mitigation, as evaluated by an arborist. Oak trees marked for removal require mitigation, where the total dbh of replacement tree (or caliper) shall be equivalent to 25 percent of the total dbh of trees removed.

Trees not marked for removal or completely avoided are assessed according to their Critical Root Zone (CRZ). The City of Paso Robles defines the CRZ as the area circumscribed around the tree's trunk using a radius of one foot per one inch dbh. Although not specified in the ordinance, mitigation of CRZ impacts are often assessed according to the percent of CRZ impact, i.e. less than 50 percent or greater than 50 percent.

1.6 Special Status Species and Sensitive Habitat Regulations

For purposes of this Biological Resource Assessment, special status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS under the FESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the CESA; animals designated as "Species of Special Concern," "Fully Protected," or "Watch List" by the CDFW; and plants with a California Rare Plant Rank (CRPR) of 1, 2, 3, or 4. In the following sections, further details are provided to highlight the different guidelines and qualifications that are used to help identify special status species in this report. In Sections 3.7 and 3.8, the various qualifications are listed in the special status species tables (Table 3 and Table 5) for each species with potential to occur in the project area.

1.6.1 California Natural Diversity Database (CNDDB)

"Special Plants" and "Special Animals" are broad terms used to refer to all the plant and animal taxa inventoried by the CNDDB, regardless of their legal or protection status (CNDDB 2024b, CNDDB 2024c). The Special Plants list includes vascular plants, high priority bryophytes (mosses, liverworts, and hornworts), and lichens. The Special Animals list is also referred to by the California Department of Fish and Wildlife (CDFW) as the list of "species at risk" or "special status species."

According to the CNDDB, Special Plants and Animals lists include: taxa that are officially listed or proposed for listing by California or the Federal Government as Endangered, Threatened, or Rare; taxa which meet the criteria for listing, as described in Section 15380 of CEQA Guidelines; taxa deemed biologically rare, restricted in range, declining in abundance, or otherwise vulnerable; population(s) in California that may be marginal to the taxon's entire range but are threatened with extirpation in California; and/or taxa closely associated with a habitat that is declining in California at a significant rate. Separately, the Special Plants List includes taxa listed in the California Native Plant Society's Inventory of Rare and Endangered Plants of California, as well as taxa determined to be Sensitive Species by the Bureau of Land Management, U.S. Fish and Wildlife Service, or U.S. Forest Service. The Special Animals List distinctively includes taxa considered by the CDFW to be a Species of Special Concern (SSC) and taxa designated as a special status, sensitive, or declining species by other state or federal agencies.

1.6.2 Federal and State Endangered Species Listings

The Federal and California Endangered Species Acts are the regulations that govern the listing and protection of species, and their habitats, identified as being endangered or threatened with extinction. Possible listing status under both Federal and California ESA includes Endangered and Threatened (FE, FT, CE, or CT). Species in the process of being listed are given the status of either Proposed Federally Endangered/Threatened, or Candidate for California Endangered/Threatened (PE, PT, CCE, or CCT). The CESA has one additional status: Rare (CR).

1.6.3 Global and State Ranks

Global and State Ranks reflect an assessment of the condition of the species or habitats across its entire range. Basic ranks assign a numerical value from 1 to 5, respectively for species with highest risk to most secure. Other ranking variations include rank ranges, rank qualifiers, and infraspecific taxon ranks. All Heritage Programs, such as the CNDDB use the same ranking methodology, originally developed by The Nature Conservancy and now maintained and recently revised by NatureServe. Procedurally, state programs such as the CNDDB develop the State ranks. The Global ranks are determined collaboratively among the Heritage Programs for the states/provinces containing the species. Rank definitions, where G represents Global and S represents State, are as follows:

- **G1/S1:** Critically imperiled globally/in state because of extreme rarity (5 or fewer populations)
- **G2/S2:** Imperiled globally/in state because of rarity (6 to 20 populations)
- **G3/S3:** Vulnerable; rare and local throughout range or in a special habitat or narrowly endemic (on the order of 21 to 100 populations)
- **G4/S4:** Apparently secure globally/in state; uncommon but not rare (of no immediate conservation concern)
- **G5/S5:** Secure; common, widespread, and abundant
- **G#G#/S#S#:** Rank range - numerical range indicating uncertainty in the status of a species, (e.g., G2G3 more certain than G3, but less certain that G2)
- **G/S#?:** Inexact numeric rank
- **Q:** Questionable taxonomy - Taxonomic distinctiveness of this entity is questionable
- **T#:** Infraspecific taxa (subspecies or varieties) – indicating an infraspecific taxon that has a lower numerical ranking (rarer) than the given global rank of species

1.6.4 California Rare Plant Ranks

Plant species are considered rare when their distribution is confined to localized areas, their habitat is threatened, they are declining in abundance, or they are threatened in a portion of their range. The California Rare Plant Rank (CRPR) categories range from species with a low threat (4) to species that are presumed extinct (1A). All but a few species are endemic to California. All of them are judged to be vulnerable under present circumstances, or to have a high potential for

becoming vulnerable. Threat ranks are assigned as decimal values to a CRPR to further define the level of threat to a given species. The rare plant ranks and threat levels are defined below.

- **1A:** Plants presumed extirpated in California and either rare or extinct elsewhere
- **1B:** Plants rare, threatened, or endangered in California and elsewhere
- **2A:** Plants presumed extirpated in California, but common elsewhere
- **2B:** Plants rare, threatened, or endangered in California, but more common elsewhere
- **4:** Plants of limited distribution - a watch list
- **0.1:** Seriously threatened in California (over 80% of occurrences threatened/high degree and immediacy of threat)
- **0.2:** Moderately threatened in California (20-80% occurrences threatened/moderate degree and immediacy of threat)
- **0.3:** Not very threatened in California (less than 20% of occurrences threatened/low degree and immediacy of threat or no current threats known)

1.6.5 California Department of Fish and Wildlife Animal Rank

The California Department of Fish and Wildlife (CDFW) assigns one of three ranks to Special Animals: Watch List (WL), Species of Special Concern (SSC), or Fully Protected (FP). Unranked species are referred to by the term Special Animal (SA).

Animals listed as Watch List (WL) are taxa that were previously designated as SSC, but no longer merit that status, or taxa that which do not yet meet SSC criteria, but for which there is concern and a need for additional information to clarify status.

Animals listed as California Species of Special Concern (SSC) may or may not be listed under California or federal Endangered Species Acts. They are considered rare or declining in abundance in California. The Special Concern designation is intended to provide the CDFW biologists, land planners, and managers with lists of species that require special consideration during the planning process to avert continued population declines and potential costly listing under federal and state endangered species laws. For many species of birds, the primary emphasis is on the breeding population in California. For some species that do not breed in California but winter here, emphasis is on wintering range. The SSC designation thus may include a comment regarding the specific protection provided such as nesting or wintering.

Animals listed as Fully Protected (FP) are those species considered by CDFW as rare or faced with possible extinction. Most, but not all, have subsequently been listed under the CESA or FESA.

1.6.6 Sensitive Habitats

Sensitive Natural Community is a state-wide designation given by CDFW to specific vegetation associations of ecological importance. Sensitive Natural Communities rarity and ranking involves the knowledge of range and distribution of a given type of vegetation, and the proportion of occurrences that are of good ecological integrity (CDFW 2023). Evaluation is conducted at both the Global (G) and State (S) levels, resulting in a rank ranging from 1 for very rare and threatened to 5 for demonstrably secure. Natural Communities with ranks of S1-S3 are considered Sensitive Natural Communities in California and may need to be addressed in the environmental review processes of CEQA and its equivalents.

2 METHODS

2.1 Literature and Data Review

Background research includes review of relevant plans, policies, and biological information to determine what biological resources may occur near or in the Study Area. Research included:

- Review of agency plans pertaining to sensitive and special-status species;
- Queries of special-status species occurrence records and databases;
- Review of literature on sensitive species and biological resources in the project area and region.

Althouse and Meade, Inc. (A&M) conducted a search of the CNDDB and the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California on February 25, 2025 (CNDDB 2025, CNPS 2025). Other database searches included online museum and herbarium specimen records for locality data within San Luis Obispo and southern Monterey Counties, as maintained by eBird (eBird 2021), and the Global Biodiversity Information Facility (GBIF 2025). The search area included the Paso Robles USGS 7.5-minute quadrangle and the 8 surrounding quadrangles (Adelaida, Bradley, Creston, Estrella, Ranchito Canyon, San Miguel, Templeton, and York Mountain). Data was compiled for sensitive plant and wildlife species and reviewed according to each species' potential to occur in the Study Area. Special status species lists produced by database and literature searches were cross-referenced with the described habitat types in the Study Area. A complete list of species and determinations are provided in Appendix B and Appendix C.

2.2 Sensitive Species Evaluation

Special status species lists produced by database and literature searches were cross-referenced and analyzed according to Study Area habitat types. Identification of all potential special status species that could occur in or near the Study Area are provided in Table 3 and Table 5. After review of the literature, and site visits, the following criteria were used to determine the potential for special-status species to occur on the Study Area:

- **Present:** The species was observed on the Study Area during field surveys.
- **High Potential:** Highly suitable habitat and CNDDB or CNPS occurrence records indicate the species is likely to occur on the Study Area or the immediate vicinity. Individuals may not have been observed during field surveys; however, the species likely occurs in or immediately adjacent to the Study Area and (for wildlife) could move into the Study Area in the future.
- **Moderate Potential:** Moderately suitable habitat is present in the Study Area and CNDDB occurrences or surveys have recorded the species in the vicinity of the Study Area. Individuals were not observed during field surveys, but the species could be present, at least seasonally or as a transient.
- **Low Potential:** Marginally suitable habitat is present in the Study Area, and there are no occurrence records or other historical (i.e., 50 years or older) records in the vicinity of the Study Area. Individuals were not observed during surveys and are not expected to be present.

- **No Potential:** Suitable habitat for the species is not present on the Study Area, and/or the species is not known to occur in the region.

Each special status species that could occur in or near the Study Area is individually discussed in Sections 3.7.1 and 3.8.1.

2.3 Soils

A soil report was created by importing the Study Area as an Area of Interest (AOI) into the Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO) via their online portal. The resulting soil report was reviewed, and a map was created using the U.S. Department of Agriculture (USDA) NRCS Soil Survey GIS data (USDA 2024a). Soils data are summarized in Section 3.2.

2.4 Biological Surveys

On March 3, 2025, A&M Biologist Jenna Heaphy (Certified Field Botanist, CCB#0074) conducted a pedestrian survey to inventory plant and wildlife species, describe habitat types, and to collect photographic documentation of the Study Area. Each habitat type was field inspected and described by species composition, as interpreted in Section 3.3. All plant and animal species observed in the field were identified and documented in Sections 3.7.2 and 3.8.2. Transects were meandering with an emphasis on locating habitat appropriate for special status plants, while also describing general conditions and dominant species and compiling a species lists. Surveys occurred in the Study Area and along both sides of Buena Vista Dr. adjacent to the Property.

TABLE 2. BIOLOGICAL SURVEYS

Survey Date	Biologist	Weather Observations	Activities
03/03/2025	Jenna Heaphy	Partially cloudy, 51 to 53 °F, calm	Biological survey Habitat mapping Botanical survey

2.4.1 Vegetation Communities

Vegetation communities were visually assessed on March 3, 2025, in the field. Vegetation communities were evaluated using the Keys for California Vegetation to confirm vegetation communities to the Alliance and Association level dependent on diagnostic species and quantitative definitions of the stand according to the Manual of California Vegetation (MCV) (CNPS 2025).

2.4.2 Botanical

Identification of botanical resources included field observations and laboratory analysis of collected material. Each habitat type occurring in the Study Area was inspected, described, and catalogued (Section 3.3). All plant species observed in the Study Area were identified and recorded by a qualified botanist (Table 4). Transects were meandering with an emphasis on locating habitat appropriate for special status plants. Transects were also utilized to map boundaries of different

vegetation types, describe general conditions and dominant species, compile species lists, and evaluate potential habitat for special status species. Early season botanical surveys were conducted in March 2025. Given the time of year, this survey was not floristic in nature. Follow-up surveys will be conducted in late spring to ensure all taxa occurring in the Study Area are identifiable and that complete survey protocols are met. Botanical nomenclature used in this document follows the Jepson eFlora (Jepson Flora Project 2025).

2.4.3 Wildlife

Identification of wildlife resources were made by direct observations or by visual signs of animal presence such as burrows/dens, vocalization, tracks, and/or scat. Wildlife observations were recorded during Study Area field surveys. Birds were identified by sight, using 10-power binoculars, or by vocalizations. Mammals recorded in the Study Area were identified by sight, burrow/dens, scat, and tracks. Wildlife surveys focused on identifying habitat suitable to support special status animal species known from the region that have potential to occur in the Study Area (Table 5). Wildlife nomenclature for birds is in accordance with the American Ornithological Society Checklist (Chesser et al. 2019) and Revised Checklist of North American Mammals North of Mexico (Bradley et al. 2014).

2.5 Maps

Field spatial data were collected using mobile devices equipped with GPS receivers and a third-party mapping application. Hand notation of habitats on high resolution aerials were digitized into polygon layers. Maps were created by importing GPS data into ArcGIS Pro, a Geographic Information System (GIS) software program. Data were overlaid onto recent aerial imagery for further analysis and visualization (Esri 2024). Soil data were overlaid on a 2020 National Agriculture Imagery Program (NAIP) aerial of San Luis Obispo County (USDA 2024b).

3 RESULTS

3.1 Existing Conditions

The Study Area is primarily flat land with minimal undulation in topography that is split into two halves by a driveway to the parking lot and the curve of Dallons Drive to the north (Photo 1, Photo 2). The western half is bordered by Buena Vista Drive where a series of telephone poles run parallel to it, as well as a small utility structure in the southwest corner. South of the property line (outside the Study Area) in the southwest corner, there is a manmade landscape feature that is occasionally ponded. Ornamental conifer trees line the parking lot south of the Study Area. The eastern half is larger and has two mature blue oak trees. A culvert passes beneath Dallons Drive near the blue oak tree, where seasonal water collects near the outfall. An old ranch road follows the southern border of the eastern half of the Study Area. A sidewalk paralleling Dallons Drive follows the northern and eastern borders of the Study Area, planted with sweetgum saplings. Annual grasses and forbs dominate the Study Area, with density and species composition varying among microhabitats. The Study Area is heavily disturbed as the land has been previously graded and is currently used as an open space by pedestrians and their dogs. This land has also been used in recent years as rangeland for animals of the Allegretto-owned petting zoo, though there is little sign of current grazing. Historical aerial imagery shows tillage lines from historical dryland grain farming for livestock feed.

Photo 1. Eastern half of the Study Area, view north, March 3, 2025.

Photo 2. Western half of the Study Area, view west, March 3, 2025.

3.2 Soils

Two soil map units are represented on the Study Area: San Ysidro loam, 0 to 2 percent slopes, MLRA 14 and Arbuckle-San Ysidro complex, 2 to 9 percent slopes (Figure 3, USDA 2024a).

Arbuckle-San Ysidro complex, 2 to 9 percent slopes (106) is the dominant soil type represented on Property, accounting for 96 percent of the project footprint. The typical soil profile is a top layer consisting of fine sandy loam (0 to 29 inches), a middle layer of sandy clay loam (29 to 38 inches), and a third layer consisting of stratified sandy loam to very gravelly sandy clay loam (38 to 62 inches). This soil class is considered well drained with a low runoff class. This soil class is formed from terraces derived from alluvium from mixed rocks sources (USDA 2024a).

San Ysidro loam, 0 to 2 percent slopes, MLRA 14 (197) is a soil type represented in a narrow band along Dallon's Drive, accounting for 4 percent of the project footprint. The typical soil profile is a top layer consisting of loam (0 to 23 inches), a middle layer of clay loam (23 to 38 inches), and a third layer consisting of loam (38 to 64 inches). This soil class is considered moderately well drained with a low runoff class. This soil class is formed from valley floors/alluvial fans/terraces from alluvium derived from sedimentary rock (USDA 2024a).

Exhibit D

Figure 3. USDA Soil Survey

Soil Type	Study Area
106 - Arbuckle-San Ysidro complex, 2 to 9 percent slopes	96%
197 - San Ysidro loam, 0 to 2 percent slopes, MLRA 14	4%

Legend

- Study Area (10.8 acres)
- USDA NRCS Soils

N

0 200 400 Feet

Allegretto Resort Expansion
Map Center: 35.64897°N 120.66829°W
Paso Robles, San Luis Obispo County

Data Source: USDA NRCS Soil Survey
Imagery Source: USDA NAIP, 09/23/2024

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Map Updated:
March 19, 2025 09:15 AM by SS

3.3 Habitat Types

The entire Study Area, approximately 10.8 acres, is mapped as California annual grassland habitat (*Avena* spp. - *Bromus* spp. Herbaceous Semi-Natural Alliance).

3.3.1 California Annual Grassland

California annual grassland comprises the entire 10.8-acre Study Area (Figure 4). Vegetation is dominated by annual non-native grasses, such as bromes (*Bromus rubens*, *B. hordeaceus*), wall barley (*Hordeum murinum*), and slender wild oat (*Avena barbata*), with associate non-native forbs such as filarees (*Erodium brachycarpum, E. cicutarium*), yellow star-thistle (*Centaurea solstitialis*), and wild mustard (*Hirschfeldia incana*). Native wildflowers are scattered throughout the grassland and create a mosaic of species including California poppy (*Eschscholzia californica*), fiddlenecks (*Amsinckia menziesii*, *A. intermedia*), and popcorn flowers (*Cryptantha* sp. and *Plagiobothrys* sp.).

This habitat type conforms to the *Avena* spp. - *Bromus* spp. Herbaceous Semi-Natural Alliance (wildoats and annual brome grasslands; CNPS 2025), where varying membership rules apply. California annual grassland in the western half of the Study Area is co-dominant with annual non-native grasses (*Bromus hordeaceus* and *Avena barbata*) and short-fruited filaree (*Erodium brachycarpum*) with little changes in species composition. In the eastern half of the Study Area, there are more microhabitats with slight changes in species composition, such as a high density of yellow star-thistle that roughly follows an old ranch road along the southeastern border of the Study Area. Beneath the shade of the blue oaks, wall barley grows dense with fiddlenecks. In the centers of both halves of the Study Area, there is a high cover of wild mustard. There is also one small swale-like depression on the eastern edge of the Study Area that supports stickwort (*Spergula arvensis*) and red maids (*Calandrinia menziesii*) in addition to short fruit filaree, a composition unique to that area.

California annual grassland habitat provides foraging habitat for birds and denning habitat for small mammals. Numerous California ground squirrel (*Otospermophilus beecheyi*) burrows were observed as well as small trails connecting them. Open grassland habitat provides visual hunting grounds for birds of prey.

Photo 3. Grassland habitat in the western half of the Study Area, view southwest, March 3, 2025.

Exhibit D

Figure 4. Biological Resources

Legend

- Study Area (10.8 acres)
- Annual Grassland

Tree Species

- Blue Oak

N

0 200 400 Feet

Allegretto Resort Expansion
Map Center: 35.64919°N 120.66836°W
Paso Robles, San Luis Obispo County

Imagery Source: USDA NAIP, 09/23/2024

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Map Updated:
March 21, 2025 01:16 PM by SS

3.4 Individual Oak Trees

Two blue oaks (*Quercus douglasii*) are present in the eastern portion of the Study Area. The tree near the center of the eastern portion of the Study Area has a dbh of 32 inches, which translates to a CRZ with a radius of 32 feet from the trunk. The tree along the northern edge of the eastern portion of the Study Area has a dbh of 36 inches, which translates to a CRZ with a radius of 36 feet.

3.5 Potential Wetlands and Jurisdictional Waters

No potential wetlands or waters are present in the Study Area.

3.6 Sensitive Natural Communities

None of the habitats in the Study Area are considered sensitive.

3.7 Botanical Resources

Research on special status plant occurrences conducted within the designated search area (see Methods) determined 46 special status plant species are known to occur in the region (Appendix B, CNDDB 2025, CNPS 2025). Figure 5 depicts the current GIS data for special status plants mapped near the Study Area by the CNDDB. There is no USFWS Critical Habitat for plants near the Study Area.

3.7.1 Special Status Plant Species

Based on an analysis of known ecological requirements for the special status plant species reported from the region, and habitat conditions that were observed in the Study Area, it was determined that two special status plant species have low potential to occur (Santa Lucia dwarf rush and shining navarretia). No species listed under the FESA and/or CESA have no potential to occur in the Study Area. Two special status plant species are discussed below and summarized in Table 3.

1. **Santa Lucia dwarf rush** (*Juncus luciensis*) is a CRPR 1B.2 species endemic to coastal California. It is known to occur in sandy soils in meadows, seeps, vernal pools, roadsides, chaparral, Great Basin scrub, and lower montane coniferous forest between 300 and 2,040 meters in elevation. It is an annual herb that typically blooms between April and July. The closest known record is approximately 4.0 miles northeast of the Study Area (CNDDB #30). Along the northeastern edge of the Study Area, there is a culvert that goes beneath Dallons Drive, creating a small roadside ditch that holds water in heavy rain years. This microhabitat could support the Santa Lucia dwarf rush, though the conditions are marginal due to the inconsistent presence of water. Additionally, both nearby occurrences are historical. Given these conditions, Santa Lucia dwarf rush has a low potential to occur in the Study Area. Santa Lucia dwarf rush was not detected in the Study Area during the early spring 2025 survey, though surveys were conducted outside of the species' typical bloom period. Follow-up late spring surveys are necessary to detect this species.

2. **Shining navarretia** (*Navarretia nigelliformis* subsp. *radians*) is a CRPR 1B.2 subspecies endemic to California, primarily occurring in central California, with occurrences as far north as Butte and as far south as San Luis Obispo counties. It is known to occur in vernal pools, grassland, and cismontane woodland habitats, often on clay and alkaline sites between 65- and 1,000 meters elevation. It is an annual herb that typically blooms between March and July. Branches are spreading to ascending from base and herbage is light gray-green (Keil and Hoover 2023, Jepson Flora Project 2025). Shining navarretia is further differentiated in the field by its yellow corolla (9-11 mm) and generally glabrous bract tips (Keil and Hoover 2023). The closest known record is approximately 0.7 miles northeast of the Study Area (CNDDB #4). Annual grassland habitat in the Study Area is marginally suitable for the shining navarretia, as it typically occurs in soils with more clay. Given these conditions, shining navarretia has a low potential to occur in the Study Area. Shining navarretia was not detected in the Study Area during the early spring 2025 survey, though surveys were conducted outside of the species' typical bloom period. Follow-up late spring surveys are necessary to detect this species.

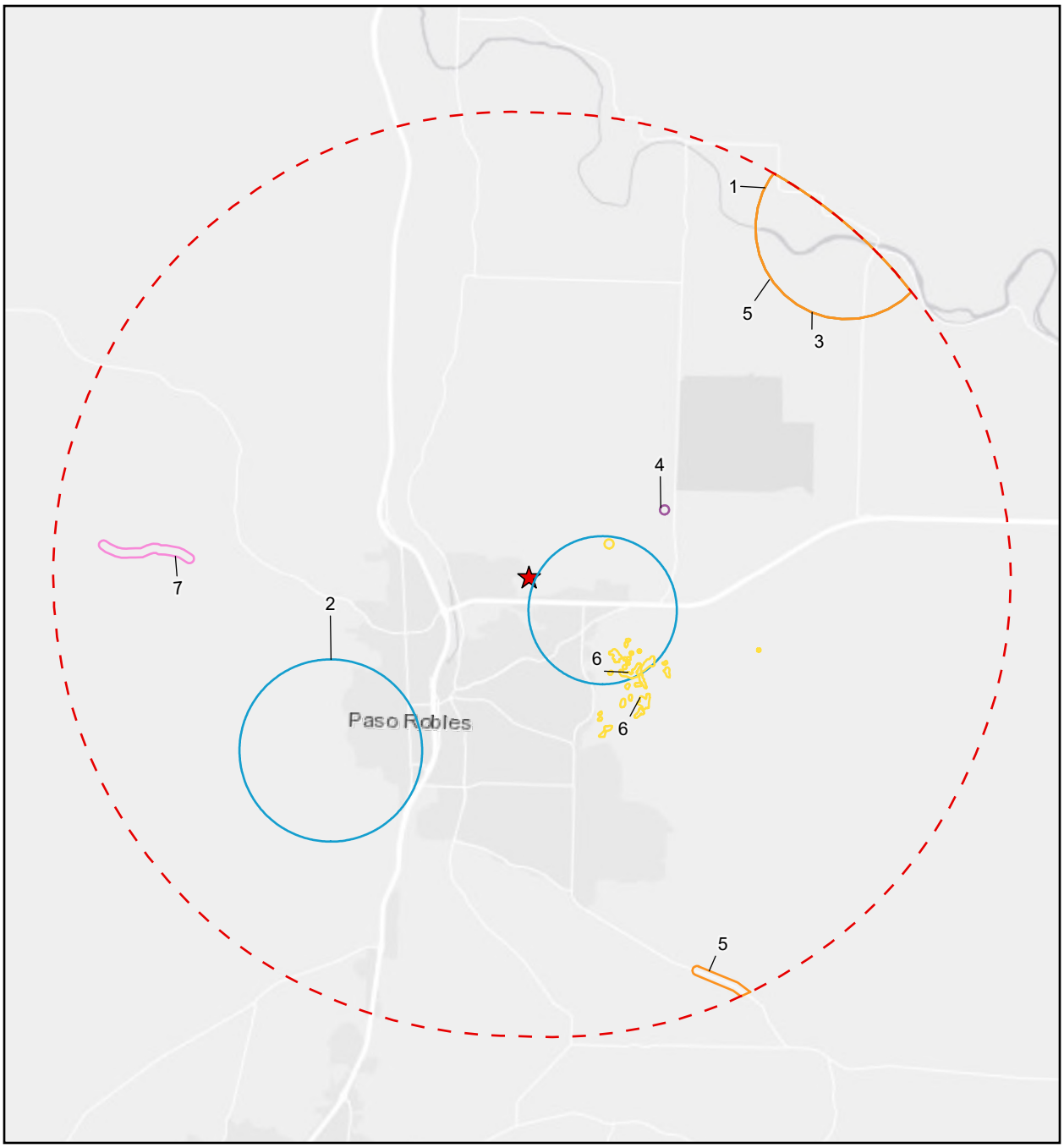
TABLE 3. SPECIAL STATUS PLANT LIST

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preference	Potential to Occur
1.	***Juncus luciensis***	Santa Lucia dwarf rush	-/- G3/S3 1B.2	Apr-Jul	Wet, sandy soils of seeps, meadows, vernal pools, streams, roadsides	**Low.** Grassy areas adjacent to the road and small ditches could support this species, though the nearest occurrences are historic and approximately 4 miles away (CNDDB #30, 1937 and CNDDB #8, 1958).
2.	***Navarretia nigelliformis*** subsp. ***radians***	Shining navarretia	-/- G4T2T3/S2S3 1B.2	Mar-Jul	Grassland and cismontane woodland. Often on clay and alkaline sites, sometimes vernal pools. 65-1,000 m.	**Low.** Marginally suitable grassland habitat is present in the Study Area, though it is highly disturbed. Nearest occurrence is 0.7 miles northeast of the Study Area (CNDDB #4, 2006).

See Section 1.6 for status and rank definitions

Exhibit D

Figure 5. California Natural Diversity Database Plant Records



Label	Common Name
1	Jared's Pepper-grass
2	Lemmon's Jewelflower
3	Oval-leaved Snapdragon
4	San Luis Obispo Owl's-clover
5	Santa Lucia Dwarf Rush
6	Shining Navarretia
7	Woodland Woollythreads

Legend

Project Location

5-mile Buffer

N

0 1 2 Miles

Allegretto Resort Expansion
Map Center: 35.64892°N 120.66823°W
Paso Robles, San Luis Obispo County

CNDDB GIS Data Last Updated: February 2025

3.7.2 Botanical Survey Results

Botanical surveys conducted on March 3, 2025 identified 29 species, subspecies, and varieties of vascular plant taxa in the Study Area (Table 4). The list includes 13 species native to California and 16 introduced (naturalized or planted) species. Native plant species account for approximately 45 percent of the Study Area flora; introduced species account for approximately 55 percent.

TABLE 4. VASCULAR PLANT LIST

Scientific Name	Common Name	Special Status	Origin
Trees - 2 Species			
Liquidambar sp.	Sweetgum	None	Ornamental
Quercus douglasii	Blue oak	None	Native
Shrubs - 1 Species			
Baccharis pilularis	Coyote brush	None	Native
Forbs - 21 Species			
Acmispon americanus var. *americanus*	American bird's foot trefoil	None	Native
Amsinckia intermedia	Common fiddleneck	None	Native
Amsinckia menziesii	Small-flowered fiddleneck	None	Native
Centaurea solstitialis	Yellow star-thistle	None	Introduced
Centromadia pungens	Common tarweed	None	Native
Crassula connata	Pygmy-weed	None	Native
Croton setiger	Doveweed	None	Native
Cryptantha sp.	Popcorn flower	None	Native
Erodium brachycarpum	Short fruited filaree	None	Introduced
Erodium cicutarium	Redstem filaree	None	Introduced
Erodium moschatum	Greenstem filaree	None	Introduced
Eschscholzia californica	California poppy	None	Native
Hirschfeldia incana	Wild mustard	None	Introduced
Hypochaeris glabra	Smooth cat's-ear	None	Introduced
Lactuca serriola	Prickly lettuce	None	Introduced
Lupinus bicolor	Miniature lupine	None	Native
Malva parviflora	Cheeseweed	None	Introduced

Scientific Name	Common Name	Special Status	Origin
Medicago polymorpha	California burclover	None	Introduced
Plagiobothrys sp.	Popcorn flower	None	Native
Spergula arvensis	Stickwort	None	Introduced
Trichostema lanceolatum	Vinegar weed	None	Native
Graminoids – 5 Species			
Avena barbata	Slender wild oat	None	Introduced
Bromus diandrus	Ripgut grass	None	Introduced
Bromus hordeaceus	Soft chess	None	Introduced
Bromus rubens	Red brome	None	Introduced
Hordeum murinum	Wall barley	None	Introduced

3.8 Wildlife Resources

Research on special status animal occurrences conducted within the designated search area (see Methods) determined 33 special status animal species are known to occur in the region (Appendix C, CNDDB 2025). Figure 6 depicts the current location data for special status species mapped near the Study Area by the CNDDB and USFWS Critical Habitat.

3.8.1 Special Status Animal Species

Based on an analysis of known ecological requirements for the special-status wildlife species reported or known from the region (Appendix C), and the habitat conditions that were observed in the Study Area, it was determined that eight special-status animal species have some potential to occur in the Study Area. Two species have a moderate potential to occur (ferruginous hawk and western spadefoot), and six species have a low potential to occur in the Study Area (golden eagle, burrowing owl, Crotch's bumble bee, Salinas pocket mouse, American badger, and San Joaquin kit fox). One species (American bumble bee) has been documented in the vicinity but is not likely to occur within the Study Area. Each species is discussed below and summarized in Table 5. The remaining 25 special status animal species that were evaluated were determined to have no potential to occur in the Study Area due to lack of suitable habitat present.

1. **Golden eagle** (*Aquila chrysaetos*) is designated a Fully Protected species by the CDFW and is federally protected by the Bald and Golden Eagle Protection Act. The species range extends throughout much of North America and in California is found in broadleaved upland and montane coniferous forests, cismontane, pinon and juniper woodlands, coastal prairie, great basin scrub and great basin, valley, and foothill grassland habitat types (CDFW 2025). Most golden eagles in California are residents year-round, but in the winter months, this population will be augmented with individuals from other nearby western states. The breeding season in California is generally from late January through August. The golden eagle prefers open habitat and in California, it extensively utilizes grazed grasslands and open shrublands for preying on

its main food source of hares or rabbits and marmots or ground squirrels (Hunt 1995; Watson 2010). Studies have shown that both the golden eagle's reproduction rate and success declines with a decrease in prey abundance. The golden eagle will even refrain from egg-laying when prey numbers are low (Driscoll 2010). In California, the golden eagle nests almost exclusively in trees (82% trees in central California) but in montane regions, it also has a preference for cliffs and will avoid nesting in densely forested habitat (Hunt 1995; Pagel et al. 2010). The golden eagle is highly sensitive to anthropogenic presences and will avoid nesting near urban areas (Pagel et al. 2010). Golden eagles will even abandon nests when human activity and development increases in their territory (Driscoll 2010). The nearest nest occurrence is 0.7 miles northeast (CNDDB 122). Nesting in the Study Area is very unlikely. Suitable foraging habitat and marginally suitable nesting habitat is present in and around the Study Area. With the nearby nest occurrence, there is a moderate potential for golden eagles to be seen in flight near the Study Area. No golden eagles were observed during the March 2025 site survey.

2. **Burrowing owl** (*Athene cunicularia*) is a California Species of Special Concern. In October 2024 it was approved by the California Fish and Game Commission to be a Candidate species under CESA. It is a small, rare owl that occupies abandoned mammal holes in the ground, most notably those of the California ground squirrel (*Otospermophilus beecheyi*). In California, the burrowing owl is a year-round resident in the Carrizo Plain, Central Valley, Imperial Valley, and the San Francisco Bay region. In the winter months, burrowing owl individuals from other western populations will augment the year-round Californian populations (Shuford and Gardali 2008). The breeding season is generally from March through August. Suitable habitat types for the burrowing owl are dry, open annual or perennial grasslands and deserts with an abundance of burrows (CDFW 2014, CNDDB 2025). Specific habitats where the owl is found include coastal prairie, coastal scrub, great basin, Mojavean and Sonoran Desert scrub, and valley and foothill grassland habitats (CNDDB 2025). While burrowing owls usually nest in burrows created by California ground squirrels, the owl is also known to inhabit badger and fox dens and man-made holes, such as pipes and culverts. Rarely, it has been known to dig its own burrow in softer soil types (Coulombe 1971, Gervais et al. 2008). Burrows with high horizontal visibility and low vegetation coverage are preferred but burrows with dense vegetation with high perch sites will be used (Green and Anthony 1989). *Orthoptera* are the main food source for the owl, but it will also consume other insects, as well as amphibians, carrion, small mammals, reptiles and birds (York et al. 2002, Gervais et al. 2008, CDFW 2014). The Study Area has grassland habitat with numerous ground squirrel holes that could support this species, though it is highly disturbed. The nearest occurrence is approximately 2.2 miles southeast (eBird 2018). There are no nesting records in the City of Paso Robles and very few detections within the City. Due to the development and disturbance of surrounding land, this species has a low potential to occur. The burrowing owl was not observed in the Study Area during the March 2025 site survey.

3. **Crotch's bumble bee** (*Bombus crotchii*) is designated by CDFW as a Special Animal and is presently a Candidate for listing as Endangered under CESA. Crotch's bumble bee is known from California, western Nevada, and northern Baja California, Mexico. The species inhabits open grassland and scrub habitats. Requirements for this, as well as all bumble bee species include suitable nesting sites, pollen and nectar sources, and suitable overwintering sites for the queen. In California, the flight period for the queen is approximately February to late October, peaking in early April, with a second pulse in July and the flight period for workers

and males is from late March through September with a peak in July (Thorp et al. 1983). In general, bumble bees forage from a diversity of plants, although individual species can vary greatly in their plant preferences, largely due to differences in tongue length (Hatfield et al. 2015). Crotch's bumble bees are classified as a short-tongued species, whose food plants include *Asclepias, Chaenactis, Lupinus, Medicago, Phacelia,* and *Salvia* (Williams et al. 2014). Little is known about overwintering for this species, however in general for bumble bees, suitable overwintering sites for queens may include soft, undisturbed soils, leaf litter, or under other debris. Grassland habitat in the Study Area contains multiple food plants for this species. The nearest occurrence is 1.7 miles northeast (CNDDB record submitted by A&M in 2024). Due to the uncommon observations of this species and disturbed condition of the habitat, Crotch's bumble bee has a low potential of occurring at the site. This species was not observed in the Study Area during site surveys in March 2025.

4. **Ferruginous hawk** (*Buteo regalis*) is on the California Watch List tracked by the CDFW due to declining populations throughout its range. It has a Global Rank of G4 (Apparently Secure) and a State Rank of S3S4, meaning it is uncertain whether this species can be considered Vulnerable (S3) or Apparently Secure (S4). Only a very small number of ferruginous hawk nests have been found in the northeast part of California and the species is considered a winter visitor or migrant to the state. In California, the ferruginous hawk is found in Great Basin, valley and foothill grassland, Great Basin scrub and pinon and juniper woodlands (CNDDB 2025). The bird prefers large, open grasslands for coursing low in search of prey, and scattered trees, power poles, and shrubs for perching. The ferruginous hawk tends to avoid habitat near human development (Travsky and Beauvais 2005; CDFW 2014). Its main prey sources are ground squirrel (*Otospermophilus beecheyi*), kangaroo rat (*Dipodomys* spp.), cottontail (*Sylvilagus* spp.), northern pocket gopher (*Thomomys* spp.) and white-tailed jackrabbit (*Lepus townsendii*). They will also eat insects, birds, amphibians and reptiles (Grindrod 1998). Ferruginous hawks occur within San Luis Obispo County from November through April (CNDDB 2025). The nearest occurrence is 1.2 miles southeast (eBird, 2021). Grassland within the Study Area is marginally suitable for foraging due to the development of the area. The Study Area is outside of the nesting range of the species. The ferruginous hawk has a low potential to occur and was not observed in the Study Area during the March 2025 site survey.

5. **Salinas pocket mouse** (*Perognathus inornatus psammophilus*) is a rare pocket mouse listed as a California Species of Special Concern (CNDDB 2025). It has a Global Rank of G4T2 (rounded status T2 – Imperiled) and a State Rank of S1 (Critically Imperiled). The Salinas pocket mouse is one of three subspecies located from the Sacramento Valley, south to the San Joaquin and contiguous valleys (including Salinas Valley). Like other species of pocket mice, the Salinas pocket mouse is nocturnal and spends the day in a burrow with a plugged entrance. During periods of low temperatures, these mice will enter a period of torpor, emerging occasionally from their burrow if their cache needs to be replenished. The Salinas pocket mouse forages on the seeds of grasses and forbs as well as seasonal vegetation. The closest reported occurrence of the Salinas pocket mouse was located 4.1 miles north in 1918 (CNDDB 9) and a more recent record was 7.2 miles northwest in 1995 (CNDDB 3). Due to the infrequent detections and lack of oak woodlands or riparian woodlands, the site has a low potential to support this species. The Salinas pocket mouse was not observed in the Study Area during the site surveys.

6. **Western spadefoot** (*Spea hammondii*) is a federally proposed Threatened species and a California Department of Fish and Wildlife Species of Special Concern (CNDDB 2025). Factors responsible for western spadefoot decline include habitat fragmentation and destruction, invasive species, climate change effects, altered fire regime, and alterations to the watershed (USFWS 2004). This species is endemic to California and northern Baja California, Mexico. Elevations for this species have been observed from near sea level to 4,460 feet in the southern Sierra foothills (Jennings and Hayes 1994). Western spadefoot is primarily an inland species, occurring in grassland habitats with friable soils and seasonal rain pools (CDFW 2014). Rainfall is critical for this species to form and maintain breeding ponds. Spadefoots remain underground for most of the year, emerging to breed in seasonal wetland pools during the rainy season. Breeding occurs from late winter to the end of March. During this time, females lay numerous small, irregular clusters each containing 10 to 42 eggs. Spadefoot development often happens rapidly. Eggs normally hatch within two weeks. Full development from egg to metamorphosis usually occurs between 3 and 11 weeks, depending upon water temperature and food resources (Morey 2000). Western spadefoot diets primarily consist of planktonic organisms and algae as tadpoles and invertebrates such as worms and insects as adults. Recruitment will most often fail if breeding ponds are inhabited by predators such as bullfrogs (*Lithobates catesbeiana*) and crayfishes (Morey 2000; CDFW 2014, Jennings and Hayes 1994). The closest reported occurrence of the western spadefoot is located approximately 0.2 miles east of the Study Area (CNDDB 1189, 2017) where 25 tadpoles were observed in a stock pond. Western spadefoots have been found to travel an average of 100 meters away from their breeding pools during the rainy season, with some traveling further (Baumberger 2019). The manmade ponded landscape features in properties near the Study Area are potential breeding areas for this species. Due to the suitable breeding habitat near the site, the nearby occurrence, and the life history of this species, the western spadefoot has moderate potential to occur within the Study Area. The western spadefoot was not observed on the property during the March 2025 site survey. Aquatic larval surveys will be conducted in April 2025 if water is present in the ponded landscape features.

7. **American badger** (*Taxidea taxus*) is a California Species of Special Concern with a widespread range across the state (Brehme et. al. 2015, CDFW 2014). It is a permanent but uncommon resident in all parts of California, except for forested regions of the far northwestern corner, and is more abundant in dry, open areas of most shrub and forest habitats (CNDDB 2025). The American badger requires friable soil in order to dig burrows for cover and breeding. The main food source for the species is fossorial rodents, mainly ground squirrels and pocket gophers (CDFW 2014). The breeding season for badgers is in summer and early fall, and females give birth to litters usually in March and April (CDFW 2014). The closest reported occurrence of the American badger was located 5.5 miles south of the Study Area. Due to the highly disturbed nature of the site, the American badger has a low potential of occurrence. No American badger or sign of badger, such as dens or dig-outs, was observed during site surveys.

8. **San Joaquin kit fox** (*Vulpes macrotis mutica*; SJKF) is federally listed as endangered and state listed as threatened. The SJKF is one of two subspecies of the kit fox, *Vulpes macrotis*, which is the smallest canid species in North America. It is endemic to the San Joaquin Valley and a few adjacent valleys in the central region of California (Cypher et al. 2013). The SJKF is primarily nocturnal and typically occurs in annual grassland or mixed shrub/grassland habitats throughout low, rolling hills and valleys. They need loose sandy soils in order to dig

their burrows and a prey population of black-tailed jackrabbits, rodents, desert cottontails, insects, some birds, reptiles, and vegetation (CDFW 2014, CNDDB 2025). The most suitable habitat for SJKF has low precipitation, sparse vegetation coverage with high densities of kangaroo rats (*Dipodomys* spp.). For the SJKF to succeed in an area it needs large expanses of non-fragmented suitable habitat. This type of habitat is decreasing rapidly by conversion into agricultural land or degraded by urban development (Cypher et al. 2013). Female SJKF began preparing natal dens in September and October and then breeding occurs from December through February. Pups are born from January to March and family groups typically split up the following October (Meaney et al. 2006). The closest reported occurrence of the SJKF was located 1.4 miles southeast in 1991 (CNDDB 941). Due to the lack of recent observations near the site, combined with surrounding developments that impede immigration, SJKF has a low potential to occur in the Study Area.

TABLE 5. SPECIAL STATUS ANIMAL LIST

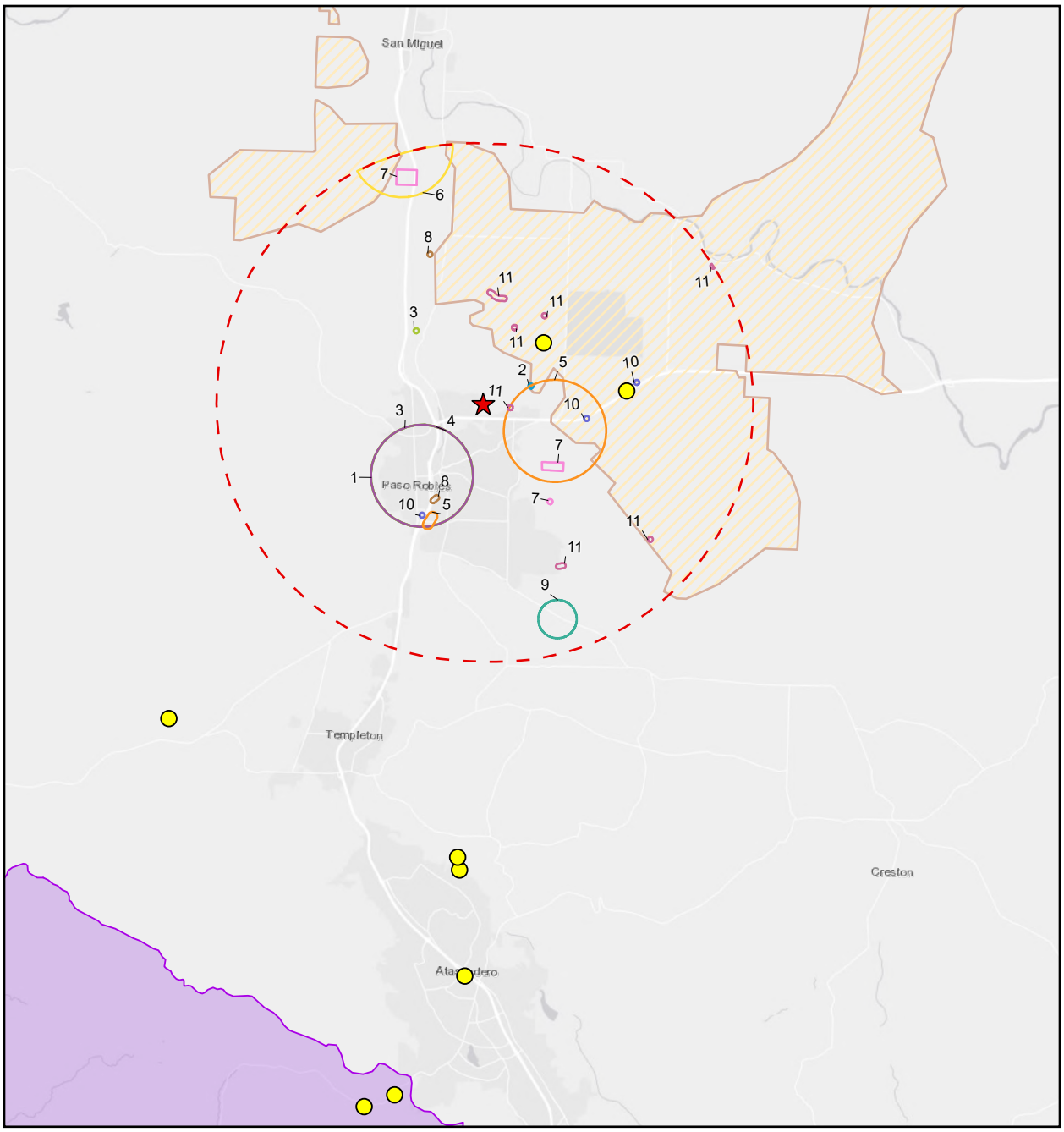
	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
1.	***Aquila chrysaetos***	Golden eagle	-/- G5/S3 FP; WL	Nests in large, prominent trees in valley and foothill woodland. Requires adjacent food source.	**Low (nesting and foraging).** Marginally suitable foraging habitat and nesting habitat is present in and around the Study Area. The nearest nest occurrence is 0.7 miles northeast (CNDDB #122, 2006).
2.	***Athene cunicularia***	Burrowing owl	-/CCE G4/S2 SSC	Burrows in squirrel holes in open habitats with low vegetation.	**Low (nesting and foraging).** The Study Area has grassland habitat with numerous ground squirrel holes suitable for nesting and foraging, though it is highly disturbed. The nearest occurrence is approximately 2.2 miles southeast (eBird, 2018)
3.	***Bombus crotchii***	Crotch's bumble bee	-/CCE G2/S2 -	Open grassland & scrub habitats. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, *Eriogonum*, *Lupinus* & *Medicago*.	**Low.** Grassland habitat in the Study Area contains multiple food plants for this species. The nearest occurrence is 1.7 miles northeast (CNDDB record submitted by Althouse and Meade in 2024).
4.	***Buteo regalis***	Ferruginous hawk	-/- G4/S3S4 WL	Winters locally in open grassland or savannah habitats. More common in interior SLO County than coast.	**Moderate (foraging).** Grassland within the Study Area is suitable for foraging. The nearest occurrence is 0.6 miles northwest (eBird, 2017). **No potential (nesting).** Study Area is outside of the breeding range.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
5.	***Perognathus inornatus psammophilus***	Salinas pocket mouse	-/- G2G3T2?/S1 SSC	Annual grassland & desert shrub in Salinas Valley, with friable soils.	**Low.** Grassland habitat with friable soils is present within the Study Area. The nearest occurrence is historical and approximately 4.1 miles north (CNDDB #9, 1918). Another more recent occurrence is 7.2 miles northwest (CNDDB #3, 1995).
6.	***Spea hammondii***	Western spadefoot	FPT/- G2G3/S3S4 SSC	Grassland & woodland habitats with vernal pools for breeding. Most of year spent underground.	**Moderate.** Manmade ponded landscape features in areas adjacent to the Study Area occasionally water during the wet season. Nearest occurrence is 0.2 miles east (CNDDB #1189, 2017).
7.	***Taxidea taxus***	American badger	-/- G5/S3 SSC	Needs friable soils in open ground with abundant food source such as California ground squirrels.	**Low.** Suitable soils and food sources are present in the Study Area, though the site is highly disturbed. Nearest occurrence is 5.53 miles south (CNDDB #23, 2003).
8.	***Vulpes macrotis mutica***	San Joaquin kit fox	FE/CT G4T2/S3 -	Annual grasslands or grassy open stages with scattered shrubby vegetation. Needs loose textured sandy soil & prey base.	**Low.** Marginally suitable soils for dens and food sources are present in the Study Area. Surrounding developments impede immigration from occupied locations. Nearest occurrence is 1.4 miles southeast (CNDDB #941, 1991).

See Section 1.6 for status and rank definitions.

Exhibit D

Figure 6.
California Natural Diversity Database Animal Records and USFWS Critical Habitat



Label	Common Name
1	Atascadero June Beetle
2	Golden Eagle
3	Least Bell's Vireo
4	Lompoc Grasshopper
5	Northern California Legless Lizard
6	Salinas Pocket Mouse
7	San Joaquin Kit Fox
8	Southwestern Pond Turtle
9	Tricolored Blackbird
10	Vernal Pool Fairy Shrimp
11	Western Spadefoot

Legend

- Project Location
- Crotch's bumble bee ocurrence
- 5-mile Buffer

USFWS Critical Habitat

- California red-legged frog
- Vernal pool fairy shrimp

N

0 2 4 Miles

Allegretto Expansion
Map Center: 35.60309°N 120.65049°W
Paso Robles, San Luis Obispo County

CNDDB GIS Data Last Updated:
February 2025

Data Source: USFWS Critical Habitat
CBB Data Source: Bumble Bee Watch, CNDDB, iNaturalist, L. Herrera

ALTHOUSE AND MEADE, INC.
BIOLOGICAL AND ENVIRONMENTAL SERVICES

Map Updated:
April 07, 2025 04:40 PM by SS

3.8.2 Wildlife Survey Results

Three wildlife taxa were observed in the Study Area during the March 3, 2025, survey: *Icaricia acmon* (Acmon blue) is a small butterfly found in grasslands and fields; *Melanerpes formicivorus* (acorn woodpecker) is found in woodlands, forests, and suburban areas; *Otospermophilus beecheyi* (California ground squirrel) is found in grasslands and pastures. None of the species hold special status. Numerous California ground squirrel burrows were identified throughout the Study Area.

3.8.3 Habitat Connectivity and Wildlife Movement

Wildlife corridors and habitat connectivity are important for the movement of wildlife between different populations and habitats.

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by resource and conservation agencies.

Wildlife movement and connectivity are constrained in the Study Area by surrounding development. The surrounding developed areas are residential, rural residential, educational, and commercial, with limited open land to the east and north. South of the Study Area is Highway 46, which is lined with a mix of commercial development including a hotel and shopping centers, and residential and rural residential housing that have removed most natural habitat for many miles. West of the property is residential for 0.6 miles, followed by the Salinas River and then Highway 101. East of the Study Area is a mosaic of rural residences, industrial areas, and agriculture fields. North of the Study area is Cuesta College, rural residential housing, and agriculture fields. Habitat within the Study Area is usable by wildlife and development would reduce the amount of wildlife habitat available. Although it would contribute to a reduction in the ability of wildlife to move through the area, development in the Study Area would not create a new barrier to an existing corridor since ground movement of wildlife is already constrained by significant development in adjacent areas in the north, south, east, and west.

4 ENVIRONMENTAL IMPACT ANALYSIS AND AVOIDANCE MEASURES

The proposed Project to expand the Allegretto Resort across an additional 10.8 acres of land could affect biological resources, including disturbed California annual grassland habitat, special status plants and animals, and native blue oak trees. This section provides mitigation recommendations (**BIO**), designed to reduce impacts to biological resources onsite, as summarized by Table 6.

TABLE 6. IMPACTS AND MITIGATION SUMMARY

Biological Resource	Potential Effect from Proposed Project	Mitigation Measure
California Annual Grassland	Direct and permanent loss of habitat.	None required
Oak Trees	Avoided. No direct or permanent effects.	None required
Special Status Plants	To be determined by Spring 2025 surveys.	To be determined
Nesting Birds	Mitigable. Loss of potential nesting habitat and/or nests.	**BIO-1**
Crotch's Bumblebee	To be determined by Spring 2025 surveys.	To be determined
Western Spadefoot	To be determined by Spring 2025 surveys.	To be determined
Special Status Mammals	Mitigable. Direct and permanent loss of habitat.	**BIO-2** through **BIO-12**
Wildlife Corridors	Negligible.	None Required

4.1 Habitats

The proposed Project would impact California annual grassland habitat. Up to 10.8 acres of California annual grassland would be permanently removed by the Project. Impacts to California annual grassland are not considered significant except where these habitat impacts affect other sensitive biological resources such as sensitive plants, animals, oak trees, or nesting birds (see following Sections 4.2 through 4.4).

4.2 Individual Oak Trees

Two individual oak trees are present within the Study Area. As shown on Table 7 no oak tree Critical Root Zone (CRZ) impacts or removals are proposed. However, oak tree avoidance and protection measures are recommended:

Tree canopies and trunks within 50 feet of proposed development footprint shall include:

- Tree protection fencing shall be shown on the grading plan. It must be a minimum of 4 feet high chain link, snow or safety fence staked (with t-posts 8 feet on center) at the edge of the CRZ or line of encroachment for each tree or group of trees. The fence shall be up before any construction or earth moving begins. The owner shall be responsible for maintaining an erect fence throughout the construction period. The arborist(s), upon notification, will inspect the fence placement once it is erected. After this time, fencing shall not be moved without arborist inspection/approval. If the orange plastic fencing is used, a minimum of four zip ties shall be used on each stake to secure the fence. All efforts shall be made to maximize the distance from each saved tree. Weatherproof signs shall be permanently posted on the fences every 50 feet, with the following information: Tree Protection Zone: No personnel, equipment, materials, or vehicles allowed.
- Grading shall not encroach within the CRZ unless authorized. Surrounding grades shall not disrupt the normal drainage pattern around the trees. Fills shall not create a ponding condition and excavations shall not leave the tree on a rapidly draining mound. Any exposed roots shall be covered the same day they were exposed if possible. If they cannot, they must be covered with burlap or another suitable material and wetted down 2 times per day until reburied.
- CRZ impacts shall be avoided where practicable. CRZ impacts include root pruning, ground disturbance within the dripline or CRZ (whichever distance is greater), and trunk damage.

If Project requires oak removal or CRZ impact, a brief Arborist report and Tree Protection Plan (TPP) will be required.

  - Oak trees shall be mapped and tagged by a qualified biologist and a licensed land surveyor. Data for each tree should include date, species, number of stems, diameter at breast height (DBH) of each stem, critical root zone (CRZ), canopy width, tree height, health rating, habitat notes, and nests observed.
  - Replacement oaks for impacted trees shall be at a 1:1 ratio for CRZ impacts less than 50 percent and 2:1 ratio for CRZ impacts to more than 50 percent.
  - Replacement oaks for removed trees shall be equivalent to 25 percent the DBH of the removed tree(s). For example, if a 16-inch DBH tree is removed, 4-inches total caliper of replacement trees is required. A one-inch caliper tree is generally in a 15-gallon container, and approximately 8 to 10 feet tall—4 of these would be required. Smaller caliper trees may be planted at a ratio of 5:1 for each tree removed.
  - Consistent with City ordinance, an Oak Tree Removal permit will be needed for oak tree removal.
  - All areas within the CRZ of the trees that can be fenced shall receive a 4–6-inch layer of chip mulch to retain moisture, soil structure and reduce the effects of soil compaction.

TABLE 7. IMPACTS TO OAK TREES

Species	Total Number	CRZ Radii (feet)	Impact		Avoided (not impacted)
			Remove	CRZ Impact	
Blue oak (*Quercus douglasii*)	2	32, 36	0	0	2
TOTAL	**2**		**0**	**0**	**2**

4.3 Botanical Resources

No federal or state listed plants were observed onsite during the March survey, and two special status species have low potential to occur in the Study Area. Spring botanical surveys will be conducted in 2025. If special status species are found to be present, mitigation recommendations will be described in an Addendum to this report.

4.4 Wildlife Resources

4.4.1 Nesting Birds

Migratory nongame native bird species are protected under the federal MBTA of 1918 and the CFGC (Sections 3503, 3503.5, and 3513) prohibits take of all birds and their active nests including raptors and other migratory nongame birds. Because it is unlawful to take, possess, or needlessly destroy nest or eggs, CDFW recommends measures to fully avoid Project impacts. Any Project-related vegetation removal and/or ground disturbing activities (e.g. mobilizing, staging, drilling, trenching, grading, and excavating) should be outside of the avian breeding season which generally occurs between February 15 through August 31 (as early as January 1 for some raptors).

BIO 1. PRE-CONSTRUCTION NESTING BIRD SURVEYS

Within one week of ground disturbance activities, if work occurs between March 15 and August 15, nesting bird surveys shall be conducted. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests until chicks are fledged. A pre-construction survey report shall be submitted to the lead agency immediately upon completion of the survey. The report shall detail appropriate fencing or flagging of the buffer zone and make recommendations on additional monitoring requirements. A map of the Project site and nest locations shall be included with the report. The Project biologist conducting the nesting survey shall have the authority to reduce or increase the recommended buffer depending upon site conditions.

4.4.2 Crotch's Bumble Bee

Crotch's bumble bee could be present in grasslands within the Project area. A spring habitat assessment will be prepared for the Project by a qualified biologist. If suitable habitat is found to be present, mitigation recommendations will be described in an Addendum to this report.

4.4.3 Western Spadefoot

Western spadefoot may breed in manmade ponded landscape features near the Project site, in which case they could be present in the Study Area during the nonbreeding season. A spring survey will be conducted in the Study Area to assess presence or absence of Western spadefoot. If Western spadefoot are present, mitigation recommendations will be described in an Addendum to this report.

4.4.4 Salinas Pocket Mouse

Salinas pocket mouse is very unlikely to be present in the Study Area. Habitats at the site are disturbed, and no current information is available on the presence of the species in the vicinity. No further recommendations are provided for this species.

4.4.5 American Badger

American badgers could occur within the Project areas. Project activities including grading and other excavation work could result in take of American badger adults or young, or disturbance of natal dens and abandonment by adult badgers. To reduce this potential impact the following measure is recommended:

BIO 2. PRE-CONSTRUCTION SURVEYS FOR AMERICAN BADGER

Within 15 days of starting any grading, grubbing, or oak tree removal, a preconstruction survey shall be conducted in the Study Area to locate occupied American badger dens within 100 feet of project areas. Highly visible fencing or rope barriers shall be installed under the direction of a project biologist in a manner sufficient to protect the dens from construction equipment. A buffer of 50 feet shall be used for occupied non-maternal dens. A buffer of 150 feet shall be installed if the den is determined to be a maternal pupping den. Construction activities shall not commence within the exclusion area until the badger has moved of its own accord. A preconstruction survey letter report shall be submitted to the lead agency for review within one week after completion of the survey.

4.4.6 San Joaquin Kit Fox

The Project is outside the City's designated San Joaquin kit fox habitat mitigation area. San Joaquin kit fox are very unlikely to occur at the site because the habitat is disturbed and surrounded by developed areas.

BIO 3 Prior to issuance of grading and/or construction permits, the applicant shall provide evidence that they have retained a qualified biologist acceptable to the City. The retained biologist shall perform the following monitoring activities:

i. **Prior to issuance of grading and/or construction permits and within 30 days prior to initiation of site disturbance and/or construction,** the biologist shall conduct a pre-activity (i.e. preconstruction) survey for known or potential kit fox dens and submit a letter to the City reporting the date the survey was conducted, the survey protocol, survey results, and what measures were necessary (and completed), as applicable, to address any kit fox activity within the project limits.

ii. **The qualified biologist shall conduct weekly site visits during site-disturbance activities** (i.e. grading, disking, excavation, stock piling of dirt or gravel, etc.) that proceed longer than 14 days. Site disturbance activities lasting up to 14 days do not require weekly monitoring by the biologist unless observations of kit fox or their dens are made on-site, or the qualified biologist recommends monitoring for some other reason. When weekly monitoring is required, the biologist shall submit weekly monitoring reports to the County.

iii. **Prior to or during project activities,** if any observations are made of San Joaquin Kit fox, or any known or potential San Joaquin kit fox dens are discovered within the project limits, the qualified biologist shall re-assess the probability of incidental take (e.g. harm or death) to kit fox. At the time a den is discovered, the qualified biologist shall contact USFWS and the CDFW for guidance on possible additional kit fox protection measures to implement and whether or not a Federal and/or State incidental take permit is needed. If a potential den is encountered during construction, work shall stop until such time the USFWS determines it is appropriate to resume work.

If incidental take of kit fox during project activities is possible, **before project activities commence,** the applicant must consult with the USFWS. The results of this consultation may require the applicant to obtain a Federal and/or State permit for incidental take during project activities. The applicant should be aware that the presence of kit foxes or known or potential kit fox dens at the project site could result in further delays of project activities.

iv. **In addition,** the qualified biologist shall implement the following measures:

1. **Within 30 days prior to initiation of site disturbance and/or construction,** fenced exclusion zones shall be established around all known and potential kit fox dens. Exclusion zone fencing shall consist of either large flagged stakes connected by rope or cord, or survey laths or wooden stakes prominently flagged with survey ribbon. Each exclusion zone shall be roughly circular in configuration with a radius of the following distance measured outward from the den or burrow entrances:
   - Potential kit fox den: 50 feet
   - Known or active kit fox den: 100 feet
   - Kit fox pupping den: 150 feet
2. All foot and vehicle traffic, as well as all construction activities, including storage of supplies and equipment, shall remain outside of exclusion zones. Exclusion zones shall be maintained until all project-related disturbances have been terminated, and then shall be removed.
3. If kit foxes or known or potential kit fox dens are found on site, daily monitoring by a qualified biologist shall be required during ground disturbing activities.

Monitoring: Required prior to issuance of a grading and/or construction permit. Compliance will be verified by the City Planning Division.

BIO 4 Prior to issuance of grading and/or construction permits, the applicant shall clearly delineate the following as a note on the project plans: "*Speed signs of 25 mph (or lower) shall be posted for all construction traffic to minimize the probability of road mortality of the San Joaquin kit fox".* Speed limit signs shall be installed on the project site within 30 days prior to initiation of site disturbance and/or construction.

BIO 5 During the site disturbance and/or construction phase, grading and construction activities after dusk shall be prohibited unless coordinated through the City, during which additional kit fox mitigation measures may be required.

BIO 6 Prior to issuance of grading and/or construction permit and within 30 days prior to initiation of site disturbance and/or construction, all personnel associated with the project shall attend a worker education training program, conducted by a qualified biologist, to avoid or reduce impacts on sensitive biological resources (i.e. San Joaquin kit fox). At a minimum, as the program relates to the kit fox, the training shall include the kit fox's life history, all mitigation measures specified by the City, as well as any related biological report(s) prepared for the project. The applicant shall notify the City shortly prior to this meeting. A kit fox fact sheet shall also be developed prior to the training program, and distributed at the training program to all contractors, employers and other personnel involved with the construction of the project.

BIO 7 During the site-disturbance and/or construction phase, to prevent entrapment of the San Joaquin kit fox, all excavations, steep-walled holes and trenches in excess of two feet in depth shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Trenches shall also be inspected for entrapped kit fox each morning prior to onset of field activities and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they shall be thoroughly inspected for entrapped kit fox. Any kit fox so discovered shall be allowed to escape before field activities resume, or removed from the trench or hole by a qualified biologist and allowed to escape unimpeded.

BIO 8 During the site-disturbance and/or construction phase, any pipes, culverts, or similar structures with a diameter of four inches or greater, stored overnight at the project site shall be thoroughly inspected for trapped San Joaquin kit foxes before the subject pipe is subsequently buried, capped, or otherwise used or moved in any way. If during the construction phase a kit fox is discovered inside a pipe, that section of pipe will not be moved. If necessary, the pipe may be moved only once to remove it from the path of activity, until the kit fox has escaped.

BIO 9 During the site-disturbance and/or construction phase, all food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of only in closed containers. These containers shall be regularly removed from the site. Food items may attract San Joaquin kit foxes onto the project site, consequently exposing such

animals to increased risk of injury or mortality. No deliberate feeding of wildlife shall be allowed.

BIO 10 Prior to, during and after the site-disturbance and/or construction phase, use of pesticides or herbicides shall be in compliance with all local, State and Federal regulations. This is necessary to minimize the probability of primary or secondary poisoning of endangered species utilizing adjacent habitats, and the depletion of prey upon which San Joaquin kit foxes depend.

BIO 11 During the site-disturbance and/or construction phase, any contractor or employee that inadvertently kills or injures a San Joaquin kit fox or who finds any such animal either dead, injured, or entrapped shall be required to report the incident immediately to the applicant and City. In the event that any observations are made of injured or dead kit fox, the applicant shall immediately notify the USFWS and CDFW by telephone. In addition, formal notification shall be provided in writing within three working days of the finding of any such animal(s). Notification shall include the date, time, location and circumstances of the incident. Any threatened or endangered species found dead or injured shall be turned over immediately to CDFW for care, analysis, or disposition.

BIO 12 Prior to final inspection, or occupancy, whichever comes first, should any long internal or perimeter fencing be proposed or installed, the applicant shall do the following to provide for kit fox passage:

i. If a wire strand/pole design is used, the lowest strand shall be no closer to the ground than 12 inches.

ii. If a more solid wire mesh fence is used, 8" x 12" openings near the ground shall be provided every 100 yards.

Upon fence installation, the applicant shall notify the City to verify proper installation. Any fencing constructed after issuance of a final permit shall follow the above guidelines

Monitoring (San Joaquin Kit Fox Measures BIO 3 through BIO 12): Compliance will be verified by the City of Paso Robles, Planning Division in consultation with the California Department of Fish and Wildlife. As applicable, each of these measures shall be included on construction plans.

4.4.7 Habitat Connectivity and Wildlife Movement

This Project does not propose impacts that would impede or block wildlife from utilizing this site for movement; therefore, no mitigation measures are recommended.

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6 APPENDICES

- **Appendix A. Site Plan**
- **Appendix B. Special Status Plants Reported from the Region**
- **Appendix C. Special Status Animals Reported from the Region**

APPENDIX A. SITE PLAN (NORTH COAST ENGINEERING, INC., MARCH 2025)

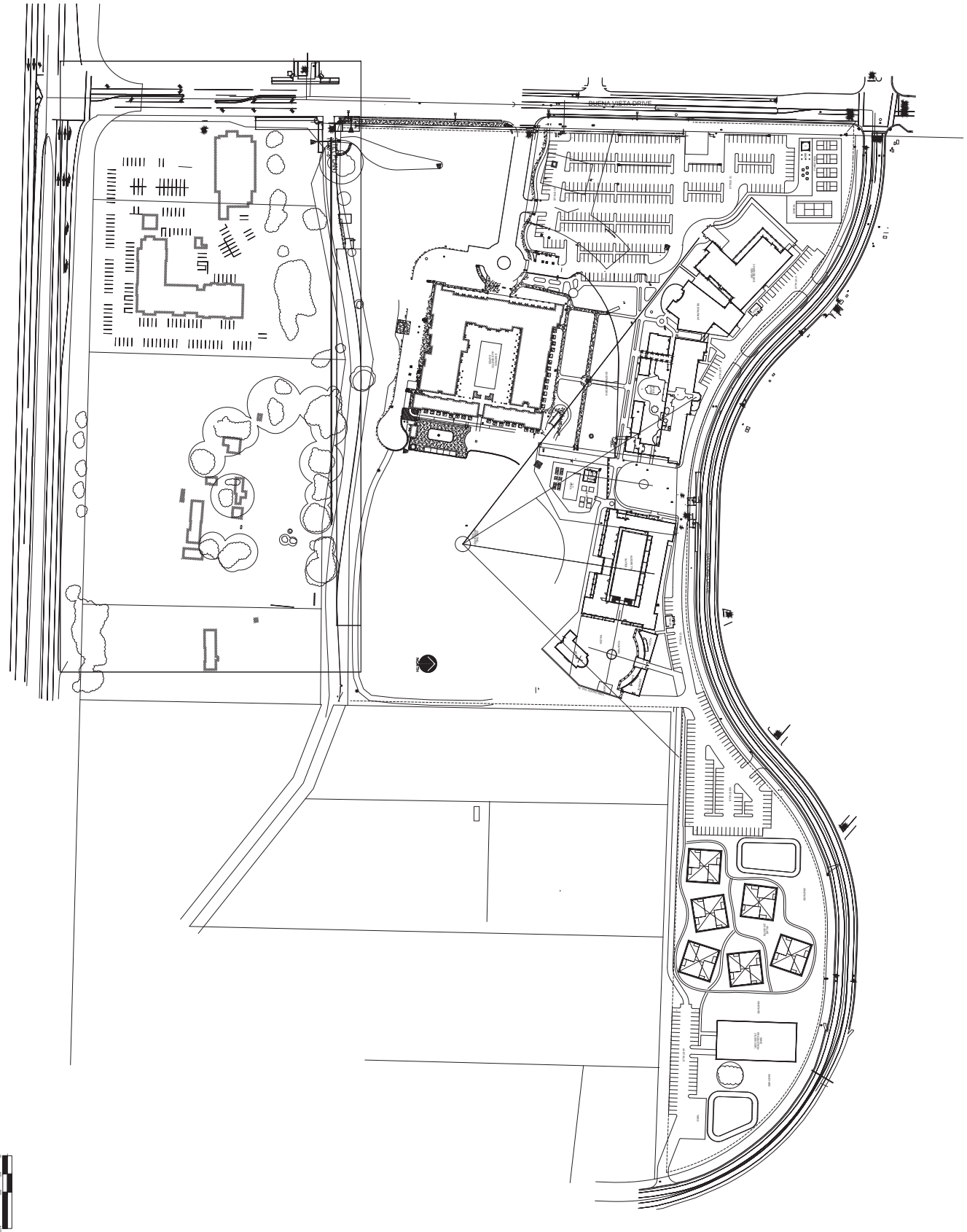

Exhibit D

SP100

SITE PLAN

BUILDING
ALLEGRETTO RESORT EXPANSION - SITE PLAN

DESIGNED	PROJECT MANAGER	PROJECT NUMBER
DSG	J Wick	ARMA0003
DRAWN BY	CHECKED	ISSUE DATE
DRW	CW	March 14, 2025
PLOT DATE		
12/26/2025		

ACS Architectural Construction Services Inc.

101 Shipyard Way
Suite B
Newport Beach, CA
92663

T (714) 436-9000
acs-architects.com

NPB | ATL | MKE | CIN

PROFESSIONAL SEAL

PROJECT
ALLEGRETT0 RESORT EXPANSION

JOB ADDRESS
Address City, ST

CLIENT
Client Name

REVISIONS

.	DATE	REVISION

APPENDIX B. SPECIAL STATUS PLANTS REPORTED FROM THE REGION

APPENDIX B. SPECIAL STATUS PLANTS REPORTED FROM THE REGION

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
1.	***Abies bracteata***	Bristlecone fir	-/- G2G3/S2S3 1B.3	-	Steep, rocky, fire-resistant slopes, generally in canyon-live-oak phase of mixed-evergreen forest	No Potential. Suitable habitat is not present in the Study Area.
2.	***Agrostis hooveri***	Hoover's bent grass	-/- G2/S2 1B.2	Apr-Jul	Sandy sites within chaparral, cismontane woodland, coniferous forest, valley and foothill grassland.	No Potential. Suitable habitat is not present in the Study Area.
3.	***Amsinckia douglasiana***	Douglas' fiddleneck	-/- G4/S4 4.2	Mar-May	Valley and foothill grassland. Dry habitats with unstable shaly sedimentary slopes. 150-1600 m.	No Potential. Suitable shaly substrates are not present in the Study Area.
4.	***Antirrhinum ovatum***	Oval-leaved snapdragon	-/- G3/S3 4.2	May-Nov	Heavy, adobe-clay soils on gentle, open slopes, also disturbed areas	No Potential. Suitable heavy clay substrates are not present in the Study Area.
5.	***Arctostaphylos hooveri***	Hoover's manzanita	-/- G3/S3 4.3	Feb-Jun	Rocky slopes, upland chaparral, open ponderosa-pine forest near coast	No Potential. Suitable habitat is not present in the Study Area.
6.	***Arctostaphylos obispoensis***	Bishop manzanita	-/- G3/S3 4.3	Feb-Jun	Chaparral, open closed-cone forest near coast. Rocky, generally serpentine soils. 60-950m.	No Potential. Suitable habitat is not present in the Study Area.
7.	***Aristocapsa insignis***	Indian Valley spineflower	-/- G1/S1 1B.2	May-Sep	Sandy soil in grassland communities, and in pine-oak or juniper woodlands	No Potential. Suitable habitat is not present in the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
8.	***Astragalus macrodon***	Salinas milk-vetch	-/- G4/S4 4.3	Apr-Jul	Eroded pale shales or sandstone, serpentine alluvium	No Potential. Suitable shaly substrates are not present in the Study Area.
9.	***Calochortus simulans***	La Panza mariposa-lily	-/- G2/S2 1B.3	Apr-Jun	Valley and foothill grassland, coniferous woodland, chaparral. Decomposed granitic sand, sometimes serpentine. <1100 m.	No Potential. Suitable habitat is not present in the Study Area.
10.	***Calycadenia villosa***	Dwarf calycadenia	-/- G3/S3 1B.1	May-Oct	Dry, rocky hills, ridges, grassland, openings in foothill woodland	No Potential. Suitable habitat is not present in the Study Area.
11.	***Camissoniopsis hardhamiae***	Hardham's evening-primrose	-/- G2/S2 1B.2	Mar-May	Sandy soil, limestone, disturbed oak woodland	No Potential. Suitable habitat is not present in the Study Area.
12.	***Castilleja densiflora*** **var.** ***obispoensis***	San Luis Obispo owl's-clover	-/- G5T2/S2 1B.2	Mar-May	Coastal grassland. Often serpentine soil. <400 m.	No Potential. Conditions are not suitable because of disturbance; closest occurrence is 1.4 miles northeast but is outside of species' typical range (CNDDB #42, 2005).
13.	***Caulanthus lemmonii***	Lemmon's jewelflower	-/- G3/S3 1B.2	Feb-May	Grassland, chaparral, scrub	No Potential. Suitable habitat is not present in the Study Area.
14.	***Ceanothus cuneatus*** **var.** ***fascicularis***	Lompoc ceanothus	-/- G5T4/S4 4.2	Feb-Apr	Coastal chaparral. Sandy substrates. <275 m.	No Potential. Suitable habitat is not present in the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
15.	***Chorizanthe douglasii***	Douglas' spineflower	-/- G4/S4 4.3	Apr-Jul	Cismontane woodland, lower montane coniferous forest, chaparral, coastal scrub, valley and foothill grassland; in sand or gravel.	No Potential. Suitable sandy/gravelly substrates are not present in the Study Area.
16.	***Chorizanthe palmeri***	Palmer's spineflower	-/- G4/S4 4.2	Apr-Aug	Chaparral, cismontane woodland, grassland. Clay soils, generally in areas of serpentine or partially serpentinized igneous rock. 60-700 m.	No Potential. Suitable habitat is not present in the Study Area.
17.	***Chorizanthe rectispina***	Straight-awned spineflower	-/- G2/S2 1B.2	Apr-Jul	Chaparral, cismontane woodland, coastal scrub. In sand or disintegrating shale, often on granite. 200-600 m.	No Potential. Suitable habitat is not present in the Study Area.
18.	***Convolvulus simulans***	Small-flowered morning-glory	-/- G4/S4 4.2	Mar-Jul	Clay substrates, occasionally serpentine, annual grassland, coastal-sage scrub, chaparral	No Potential. Suitable clay substrates are not present in the Study Area.
19.	***Delphinium parryi*** **subsp.** ***eastwoodiae***	Eastwood's larkspur	-/- G4T2/S2 1B.2	Feb-Mar	Uncommon. Coastal chaparral, grassland, on serpentine	No Potential. Suitable habitat is not present in the Study Area.
20.	***Delphinium umbraculorum***	Umbrella larkspur	-/- G3/S3 1B.3	Apr-Jun	Moist oak forest	No Potential. Suitable habitat is not present in the Study Area.
21.	***Entosthodon kochii***	Koch's cord moss	-/- G1/S1 1B.3	-	Cismontane woodland. Moss growing on soil.	No Potential. Suitable habitat is not present in the Study Area.
22.	***Eriastrum luteum***	Yellow-flowered eriastrum	-/- G2/S2 1B.2	May-Jun	Bare sandy decomposed granite slopes in cismontane woodland, chaparral, forest	No Potential. Suitable habitat is not present in the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
23.	***Eriogonum elegans***	Elegant wild buckwheat	-/- G4G5/S4S5 4.3	May-Nov	Uncommon. Cismontane woodland, valley and foothill grassland. Usually in sandy or gravelly substrates; often in washes, sometimes roadsides.	No Potential. Suitable habitat is not present in the Study Area.
24.	***Eriogonum nudum* var. *indictum***	Protruding buckwheat	-/- G5T4/S4 4.2	Apr-Dec	Clay	No Potential. Suitable clay substrates not present in the Study Area.
25.	***Eriophyllum jepsonii***	Jepson's woolly sunflower	-/- G3/S3 4.3	Apr-Jun	Dry oak woodland	No Potential. Suitable habitat is not present in the Study Area.
26.	***Eschscholzia hypecoides***	San Benito poppy	-/- G4/S4 4.3	Mar-Jun	Grassy areas in woodland, chaparral, shale-derived soils	No Potential. Suitable shale soils are not present in the Study Area.
27.	***Fritillaria agrestis***	Stinkbells	-/- G3/S3 4.2	Mar-Jun	Clay, often vertic, occasionally serpentine	No Potential. Suitable habitat is not present in the Study Area.
28.	***Gilia latiflora subsp. cuyamensis***	Cuyama gilia	-/- G5?T4/S4 4.3	Apr-Jun	Sandy flats, pinyon/juniper woodland, lower river valleys	No Potential. Suitable habitat is not present in the Study Area.
29.	***Gilia tenuiflora subsp. amplifaucalis***	Trumpet-throated gilia	-/- G3G4T3/S3 4.3	Mar-Apr	Sandy soil of dry creeks, floodplains, slopes	No Potential. Suitable habitat is not present in the Study Area.
30.	***Hesperevax caulescens***	Hogwallow starfish	-/- G3/S3 4.2	Mar-Jun	Declining. Drying shrink-swell clay of vernal pools, flats, steep slopes (sometimes serpentine)	No Potential. Suitable habitat is not present in the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
31.	***Hooveria purpurea* var. *purpurea***	Santa Lucia purple amole	FT/- G2T2/S2 1B.1	Apr-Jun	Often in grassy areas with blue oaks in foothill woodland. Gravelly clay soils.	No Potential. Suitable habitat is not present in the Study Area.
32.	***Horkelia cuneata* var. *puberula***	Mesa horkelia	-/- G4T1/S1 1B.1	Feb-Sep	Dry, sandy, coastal chaparral and oak woodland	No Potential. Suitable habitat is not present in the Study Area.
33.	***Horkelia cuneata* var. *sericea***	Kellogg's horkelia	-/- G4T1?/S1? 1B.1	Apr-Sep	Old dunes, coastal sandhills	No Potential. Suitable habitat is not present in the Study Area.
34.	***Juncus luciensis***	Santa Lucia dwarf rush	-/- G3/S3 1B.2	Apr-Jul	Wet, sandy soils of seeps, meadows, vernal pools, streams, roadsides	**Low.** Grassy areas adjacent to the road and small ditches could support this species, though the nearest occurrences are historic and approximately 4 miles away (CNDDB #30, 1937 and CNDDB #8, 1958).
35.	***Lasthenia leptalea***	Salinas Valley goldfields	-/- G3/S3 4.3	Feb-Apr	Openings in woodland, sandy and gravelly substrates, decomposed granite	No Potential. Suitable substrates are not present in the Study Area.
36.	***Lepidium jaredii* subsp. *jaredii***	Jared's pepper-grass	-/- G2G3T1T2/S1S2 1B.2	Mar-May	Valley and foothill grassland (alkaline, adobe)	No Potential. Suitable alkaline soils are not present in the Study Area.
37.	***Lessingia tenuis***	Spring lessingia	-/- G4/S4 4.3	May-Jul	Openings in chaparral, woodland	No Potential. Suitable habitat is not present in the Study Area.

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38.	***Malacothamnus discombobulatus***	Discombobulating bushmallow	-/- GNR/S2 1B.2	Jul-Aug	Early-recovering post-burn woody vegetation, edges of openings, some plants occasionally persisting into more mature vegetation stages;	No Potential. Suitable habitat is not present in the Study Area.
39.	***Meconella oregana***	Oregon meconella	-/- G2/S2 1B.1	Mar-Apr	Shaded canyons	No Potential. Suitable habitat is not present in the Study Area.
40.	***Mielichhoferia elongata***	Elongate copper moss	-/- G5/S3S4 4.3	-	Metamorphic rock, usually acidic, usually vernally mesic, often roadsides, sometimes carbonate	No Potential. Suitable metamorphic substrates are not present in the Study Area.
41.	***Monolopia gracilens***	Woodland woollythreads	-/- G3/S3 1B.2	Feb-Jul	Serpentine grassland, open chaparral, oak woodland	No Potential. Suitable habitat is not present in the Study Area.
42.	***Navarretia fossalis***	Spreading navarretia	FT/- G2/S2 1B.1	Apr-Jun	Vernal pools, ditches	No Potential. Vernal pools are not present in the Study Area.
43.	***Navarretia nigelliformis* subsp. *radians***	Shining navarretia	-/- G4T2T3/S2S3 1B.2	Mar-Jul	Grassland and cismontane woodland. Often on clay and alkaline sites, sometimes vernal pools. 65-1,000 m.	**Low.** Marginally suitable grassland habitat is present in the Study Area, though it is highly disturbed. Nearest occurrence is 0.7 miles northeast of the Study Area (CNDDB #4, 2006).
44.	***Navarretia prostrata***	Prostrate vernal pool navarretia	-/- G2/S2 1B.2	Apr-Jul	Alkaline floodplains, vernal pools	No Potential. Vernal pools and alkaline soils are not present in the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CA Rare Plant Rank	Blooming Period	Habitat Preferences	Potential to Occur
45.	***Plagiobothrys uncinatus***	Hooked popcornflower	-/- G2/S2 1B.2	Apr-May	Chaparral, canyon sides, rocky outcrops, fire follower	No Potential. Suitable habitat is not present in the Study Area.
46.	***Stebbinsoseris decipiens***	Santa Cruz microseris	-/- G2/S2 1B.2	Apr-May	Open, sandy, shaly, or serpentine sites, coastal	No Potential. Suitable habitat is not present in the Study Area.

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California Rare Plant Ranks:
CRPR 1A: Plants presumed extirpated in California and either rare or extinct elsewhere
CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere
CRPR 2A: Plants presumed extirpated in California, but common elsewhere
CRPR 2B: Plants rare, threatened, or endangered in California, but more common elsewhere
CRPR 4: Plants of limited distribution - a watch list
0.1 - Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2 - Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3 - Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

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G2/S2 – Imperiled
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APPENDIX C. SPECIAL STATUS ANIMALS REPORTED FROM THE REGION

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	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
1.	***Actinemys pallida***	Southwestern pond turtle	FPT/- G2G3/SNR SSC	Ponds, lakes rivers, streams with abundant vegetation	No potential. No suitable habitat is present in or around the Study Area.
2.	***Agelaius tricolor***	Tricolored blackbird	-/CT G1G2/S2 SSC	Requires open water, protected nesting substrate, & foraging area with insect prey near nesting colony.	No potential. No suitable habitat is present in or around the Study Area.
3.	***Anniella pulchra***	Northern California legless lizard	-/- G3/S2S3 SSC	Sandy or loose loamy soils under coastal scrub or oak trees. Soil moisture essential.	No potential. No suitable habitat is present in or around the Study Area.
4.	***Antrozous pallidus***	Pallid bat	-/- G4/S3 SSC	Uses rock crevices, caves, tree hollows, mines, old buildings, & bridges for roosting.	No potential. No suitable habitat is present in or around the Study Area.
5.	***Aquila chrysaetos***	Golden eagle	-/- G5/S3 FP; WL	Nests in large, prominent trees in valley and foothill woodland. Requires adjacent food source.	**Low (nesting and foraging).** Marginally suitable foraging habitat and nesting habitat is present in and around the Study Area. The nearest nest occurrence is 0.7 miles northeast (CNDDB #122). **Moderate (in flight).** There is moderate potential for this species to be sighted flying over the study area from more suitable habitat in surrounding areas.
6.	***Ardea herodias***	Great blue heron	-/- G5/S4 -	Rookeries located in tall trees near foraging areas.	No potential. No suitable nesting habitat at the site. The nearest occurrence is 14.2 miles northwest (CNDDB #57).

	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
7.	***Athene cunicularia***	Burrowing owl	-/CCE G4/S2 SSC	Burrows in squirrel holes in open habitats with low vegetation.	**Low (nesting and foraging).** The Study Area has grassland habitat with numerous ground squirrel holes that could support this species, though it is highly disturbed. The nearest occurrence is approximately 2.2 miles southeast (eBird, 2018)
8.	***Batrachoseps minor***	Lesser slender salamander	-/- G1/S1 SSC	Inhabits moist locations in forests of mixed oak, tanbark oak, sycamore & laurel above 1,300 ft (400 m).	No potential. No suitable habitat is present in or around the Study Area.
9.	***Bombus crotchii***	Crotch's bumble bee	-/CCE G2/S2 -	Open grassland & scrub habitats. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, *Eriogonum*, *Lupinus* & *Medicago*.	**Low.** Grassland habitat in the Study Area contains multiple food plants for this species. The nearest occurrence is 1.7 miles northeast (CNDDB record submitted by Althouse and Meade in 2024).
10.	***Bombus pensylvanicus***	American bumble bee	-/- G3G4/S2 -	Valley and foothill grasslands, coastal prairies. Food plant genera include *Vicia, Trifolium, Cirsium, & Helianthus.*	No potential. Marginally suitable grassland habitat is present within the Study Area. Nearest occurrence is 9.0 miles south and is outside the typical range of this species (CNDDB #380, 2023).
11.	***Branchinecta lynchi***	Vernal pool fairy shrimp	FT/- G3/S3 -	Clear water sandstone depression pools, grassed swale, earth slump, or basalt flow depression pools.	No potential. No suitable habitat is present in or around the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
12.	***Buteo regalis***	Ferruginous hawk	-/- G4/S3S4 WL	Winters locally in open grassland or savannah habitats. More common in interior SLO County than coast.	**Moderate (foraging).** Grassland within the Study Area is suitable for foraging. The nearest occurrence is 0.6 miles northwest (eBird, 2017). No potential (nesting). Outside of nesting range.
13.	***Corynorhinus townsendii***	Townsend's big-eared bat	-/- G4/S2 SSC	Roosts in caves, abandoned buildings, tunnels. Roosting sites limiting. Sensitive to human disturbance.	No potential. No suitable habitat is present in or around the Study Area.
14.	***Eremophila alpestris actia***	California horned lark	-/- G5T4Q/S4 WL	Nests on the ground in open habitats with low, sparse vegetation. More common in the interior.	No potential. Vegetation within the Study Area too dense to support this species.
15.	***Falco mexicanus***	Prairie falcon	-/- G5/S4 WL	Inhabits dry, open terrain. Nests on cliffs near open areas for hunting.	No potential. There is no suitable nesting habitat within the Study Area.
16.	***Haliaeetus leucocephalus***	Bald eagle	FD/CE G5/S3 FP	Nests within 1 mi of water in tall live tree with open branches.	**No potential (foraging and nesting).** The Salinas River is 0.7 miles west of the Study Area. Nearest nest is 9.3 miles east and last confirmed active by Althouse and Meade, Inc. on 2/20/2025.
17.	***Lasiurus cinereus***	Hoary bat	-/- G3G4/S4 -	Forages in open habitats or habitat mosaics with trees. Roosts in dense foliage of medium to large trees. Feeds on moths. Requires water.	No potential. No suitable habitat within the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
18.	***Lavinia exilicauda harengus***	Monterey hitch	-/- G4T3/S3 SSC	Pajaro & Salinas river systems. Most abundant in lowland areas with large pools or in small reservoirs that mimic such conditions.	No potential. No suitable habitat is present in or around the Study Area.
19.	***Masticophis flagellum ruddocki***	San Joaquin coachwhip	-/- G5T2T3/S3 SSC	Open, dry, treeless areas with low vegetation cover. Valley grasslands.	No potential. The habitat in the Study Area is urban and fragmented from the closest occurrence 9.9 miles north (CNDDB #84, 1999).
20.	***Neotoma macrotis luciana***	Monterey dusky-footed woodrat	-/- G5T3/S3 SSC	Variety of habitats with moderate to dense understory vegetation.	No potential. No suitable habitat is present in or around the Study Area.
21.	***Perognathus inornatus psammophilus***	Salinas pocket mouse	-/- G2G3T2?/S1 SSC	Annual grassland & desert shrub in Salinas Valley, with friable soils.	**Low.** Grassland habitat with friable soils is present within the Study Area. The nearest occurrence is historical and approximately 4.1 miles north (CNDDB #9, 1918). Another more recent occurrence is 7.2 miles northwest (CNDDB #3, 1995).
22.	***Phrynosoma blainvillii***	Coast horned lizard	-/- G4/S4 SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes.	No potential. No suitable habitat is present in or around the Study Area.
23.	***Polyphylla nubila***	Atascadero June beetle	-/- G1/S1 -	Known only from sand dunes in Atascadero & SLO.	No potential. No suitable habitat is present in or around the Study Area.
24.	***Rana boylii* pop. 6**	Foothill yellow-legged frog - south coast DPS	FE/CE G3T1/S1 -	-	No potential. No suitable habitat is present in or around the Study Area.

	Scientific Name	Common Name	Federal/State Status Global/State Rank CDFW Status	Habitat Preferences	Potential to Occur
25.	***Rana draytonii***	California red-legged frog	FT/- G2G3/S2S3 SSC	Lowlands & foothills in or near sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks for larval development.	No potential. No suitable habitat is present in or around the Study Area.
26.	***Setophaga petechia***	Yellow warbler	-/- G5/S3 SSC	Frequently found nesting & foraging in willow shrubs & thickets, & in other riparian plants including cottonwoods, sycamores, ash, & alders.	No potential. No suitable habitat is present in or around the Study Area.
27.	***Spea hammondii***	Western spadefoot	FPT/- G2G3/S3S4 SSC	Grassland & woodland habitats with vernal pools for breeding. Most of year spent underground.	**Moderate.** Manmade ponded landscape features in areas adjacent to the Study Area occasionally water during the wet season. Nearest occurrence is 0.2 miles east (CNDDB #1189, 2017).
28.	***Strix occidentalis occidentalis***	California Spotted Owl	-/- G3G4T2T3/S3 SSC	Most often found in deep-shaded canyons, on north-facing slopes, & within 984 ft (300 m) of water.	No potential. No suitable habitat is present in or around the Study Area.
29.	***Taricha torosa***	Coast Range newt	-/- G4/S4 SSC	Lives in terrestrial habitats & will migrate >0.62 mi (1 km) to breed in ponds, reservoirs & slow moving streams.	No potential. No suitable habitat is present in or around the Study Area.
30.	***Taxidea taxus***	American badger	-/- G5/S3 SSC	Needs friable soils in open ground with abundant food source such as California ground squirrels.	**Low.** Suitable soils and food sources are present in the Study Area, though the site is highly disturbed. Nearest occurrence is 5.53 miles south (CNDDB #23, 2003).
31.	***Trimerotropis occulens***	Lompoc grasshopper	-/- G1G2/S1S2 -	Gravelly/rocky substrates & road cuts. Known only from Santa Barbara & SLO Counties.	No potential. No suitable habitat is present in or around the Study Area.

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32.	***Vireo bellii pusillus***	Least Bell's vireo	FE/CE G5T2/S3 -	Riparian habitat, near water or dry streambed, <2000 ft. Nests in willows, mesquite, Baccharis.	No potential. No suitable habitat is present in or around the Study Area.
33.	***Vulpes macrotis mutica***	San Joaquin kit fox	FE/CT G4T2/S3 -	Annual grasslands or grassy open stages with scattered shrubby vegetation. Needs loose textured sandy soil & prey base.	**Low.** Marginally suitable soils for dens and food sources are present in the Study Area, and surrounding developments impede movement from nearby habitat. Nearest occurrence is 1.4 miles southeast (CNDDB #941, 1991).

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SSC: Species of Special Concern
FP: Fully Protected
SA: Special Animal