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TECHNICAL MEMORANDUM

DATE: January 10, 2019

TO: Kristen Goland, Pacific Wind Development LLC

FROM: Andrea Chatfield and Kurt Flaig, WEST, Inc.

RE: Request for clarifications on 2018 Rare Plant Survey and Natural Vegetation Community Mapping Report for the Fountain Wind Project

On behalf of Pacific Wind Development LLC, Western EcoSystems Technology, Inc. (WEST) prepared a Rare Plant Survey and Natural Vegetation Community Mapping Report (Report) for the proposed Fountain Wind Energy Project (Project). The Report, dated October 17, 2018, was submitted to Shasta County and subsequently reviewed by ESA. Based on their review, ESA requested, in a memorandum dated January 4, 2019, that clarifications or additional data be provided in regard to the Report. Each of ESA's specific requests is listed below followed by WEST's response.

- 1. The report is not clear as to why a single year would be sufficient for the presence/absence study. Please elaborate on whether seasonal climate conditions were sufficient for detection or if there were any adverse conditions that could prevent surveyors from determining presence.*

No adverse conditions occurred within the Project area in 2017-2018 that may have precluded the presence or identification of special status plant species. A review of precipitation data from November 1, 2017 to May 31, 2018 shows that precipitation during the winter and spring time period preceding the survey was about 63% of average based on historical precipitation data for Redding, California (US Climate Data 2019). While this is somewhat lower than normal precipitation for the region, it would be expected that individuals of the targeted rare plant species would have been visible during the 2018 botanical survey, if present. Based on this expectation, a second year of rare plant surveys is not warranted for the Project. Additional rare plant surveys are scheduled to occur within newly added development corridors in the Project's southern Expansion Area in spring of 2019.

- 2. Butte County morning-glory (*Calystegia atriplicifolia* ssp. *buttensis*) was described as present in the Site Characterization Study, and is listed as observed in their Rare Plant*

Survey report. While it is a CNPS Rare Plant Rank 4.2 (limited distribution), the species observation should be noted for analysis as part of the CEQA process.

For the purpose of the rare plant survey at the Project, target species were limited to state or federal-listed species, and species with a California Native Plant Society (CNPS) rare species rank of 1B and 2B (rare, threatened, or endangered in California). Butte County morning-glory has a CNPS ranking of 4.2 and was, therefore, not include as a focal species. However, individuals of species with a CNPS ranking of 3 and 4, including Butte County morning-glory, were noted when encountered over the course of the survey. The Butte County morning-glory observations were made just outside of the Project boundary, near a gate approximately 80 meters south of Hwy 299. These observations should not have been included in Appendix B (Plant Species Encountered within the Fountain Wind Project), as they fell just outside of the Project boundary. No other individuals of this species were located within the Project boundary or within survey corridors. The vast majority of historic Butte County morning-glory observations documented in the California Natural Diversity Database and included in the 2017 Site Characterization Study were located in the northwest portion of the larger Project area evaluated in the SCS and outside of the area surveyed during the 2018 botanical survey effort.