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Date: June 9, 2023

To: John Kuba, ConnectGen LLC

From: Joel Thompson – Western EcoSystems Technology, Inc. (WEST)

Subject: **Rare Plant Spot Check Surveys for the Fountain Wind Project**

SCOPE OF WORK

Rare Plant Spot-Check Surveys

WEST conducted rare plant surveys in proposed development corridors at the Fountain Wind Project (Project) over the course of three survey seasons, in 2018, 2019, and 2021. Although no rare plants were identified in the survey corridors during those surveys, the survey data are now 2-5 years old depending on the area surveyed. To support the CEQA analysis to be conducted by the California Energy Commission (CEC) in association with their review of the Project, WEST will conduct rare plant spot-check surveys during summer of 2023 to support (or modify) prior findings regarding the potential presence of rare plants in the Project's development corridors, and proposed disturbance areas in particular.

Given the flowering and fruiting periods of the 51 plant taxa with at least some potential to occur, two rounds of surveys have been conducted in the past. During prior years, these occurred in late May and late July; however, given the timing of the survey request, and the delayed spring/summer weather pattern in northern California this year, spot-check surveys will be conducted in June and early August of 2023. Given the number of species previously identified as having some potential for occurrence, visitation of known reference populations of the species is not feasible/practicable; however, prior to conducting the surveys, the WEST botanist(s) will review literature and photographs for the targeted plant species.

Spot-check surveys will focus on "higher quality habitats" believed to have the highest likelihood of supporting rare plants. Based on the habitat requirements of the target species, wet montane meadows, mixed montane riparian scrub, mixed montane riparian forest, and rock outcrops will be among the targeted vegetation communities, as a majority of the targeted plant species are typically associated with these communities. A sample of unburned mixed conifer forest will also be sampled.

A minimum of 20 sample locations (Figure 1) will be surveyed during each of the two visits (June/August). Sample locations will include areas representing rock outcrops (2 locations), wet montane meadows (3 locations), mixed montane riparian scrub (8 locations), mixed montane

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riparian forest (3 locations), and unburned mixed conifer (4 locations) vegetation communities. These 20 sites are distributed throughout the Project footprint in areas of potential disturbance (temporary or permanent), with the exception of several locations in the wet meadow complex near Highway 299 which are 100-200 m from the nearest disturbance; however, these are representative of wet montane meadow habitats in the area.

Searches will be completed at each of the 20 sites, with approximately 30-60 minutes of effort spent surveying at each location; total survey time to be dependent on the size and quality of the habitat. Based on this level of effort, it is anticipated that two full field days will be required to complete the 20 spot-check surveys. If time allows, additional survey effort will be expended surveying additional "higher quality" habitats along road corridors proposed for widening. These additional surveys would target unique habitat features, if observed while traveling the site (e.g., seeps, natural openings/meadows, unique soil features).

Surveys will be conducted using an intuitive controlled survey approach, by which the surveyor will walk meandering transects through the survey area targeting areas with the highest potential for supporting rare plants. Any rare plant occurrence will be recorded with a GPS as either a polygon feature, if multiple individuals are encountered over a relatively large area or as a point feature if only one or several individuals are encountered in close proximity to one another. Information recorded for each rare plant occurrence encountered will include population size, associate plant species, natural vegetation community, plant phenology, slope position and aspect, and representative photographs of the rare plant(s) and its associated habitat. A list of all plant species encountered during the rare plant survey will be maintained. *The Jepson Manual: Vascular Plants of California, 2nd Ed.* (Baldwin 2012) will be the primary authority used for plant identification.

Once the field survey has been completed, WEST will document all results and photos from the field survey effort in a technical memorandum. If rare plant occurrences are encountered, figures and shape files depicting their locations within the Project area will be provided.

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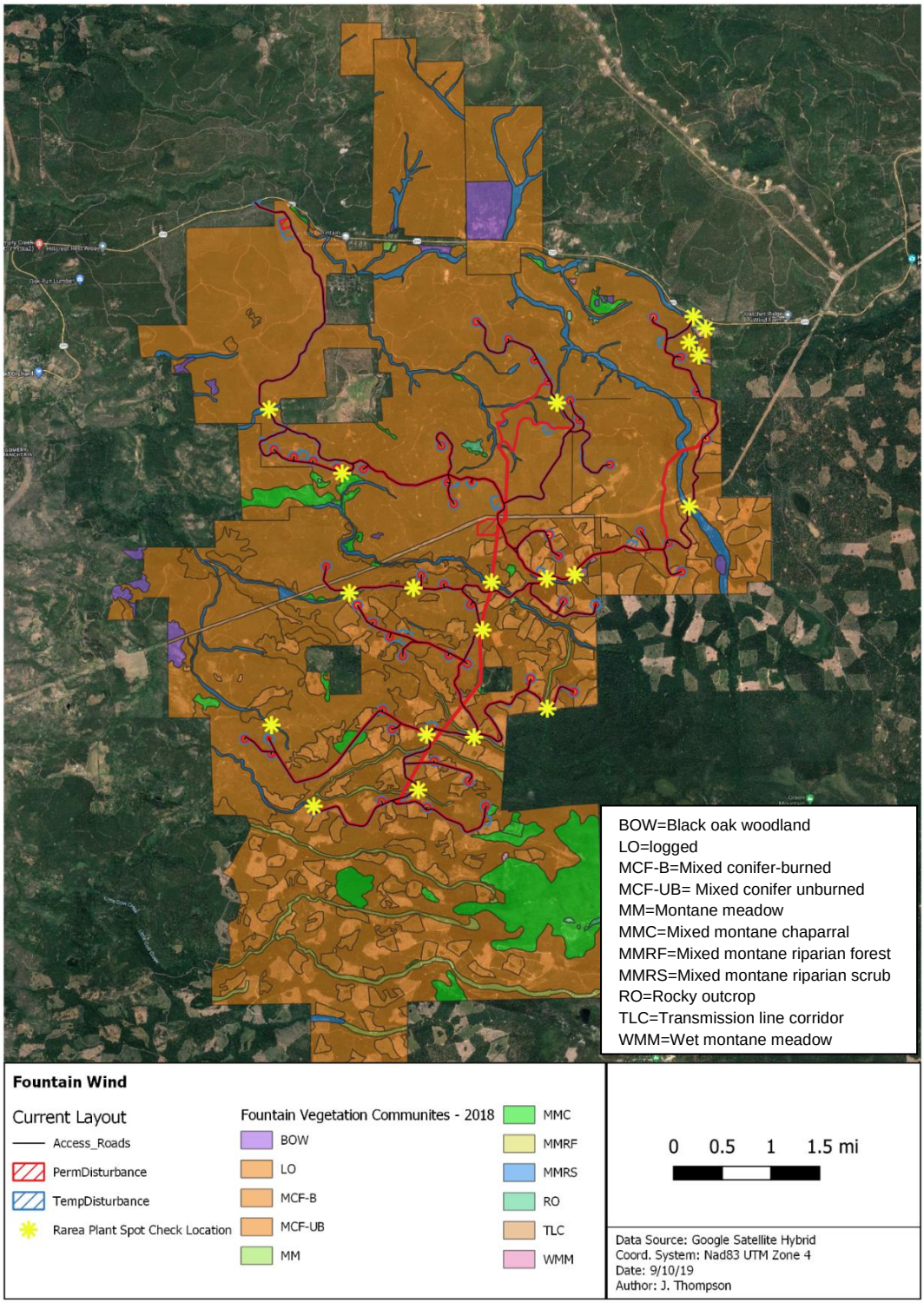

Figure 1. Project layout, vegetation communities, and proposed 2023 rare plant spot check survey locations for the Fountain Wind Energy Project, Shasta County, CA.