B.9 - Supplemental Focused Rare Plant Survey (Tim Krantz, June 2008

MOON CAMP TENTATIVE TRACT 16136

SUPPLEMENTAL FOCUSED RARE PLANT SURVEY

Prepared for:
Michael Brandman Associates
621 E. Carnegie Dr., Suite 100
San Bernardino, CA 92408

Prepared by:
Dr. Timothy P. Krantz
Timothy Krantz Environmental Consulting
(a division of Pangaea Nova LLC)
P.O. Box 33
Angelus Oaks, CA 92305

June 29, 2008

Project site location:	USGS Fawnskin 7½-minute topographic map, Township 2 North, Range 1 West, portion of Section 13.
Assessors Parcel Nos.:	0304-082-04 and 0304-091-12, 13 and 21
Owner /Applicant:	Tim Wood, P.O. Box 6820, Big Bear Lake, CA 92315
Principal Investigator:	Dr. Timothy P. Krantz, (909)748-8590

MOON CAMP TENTATIVE TRACT
SUPPLEMENTAL FOCUSED RARE PLANT SURVEY

TABLE OF CONTENTS

MAPS, APPENDICES, AND ATTACHMENTS

MOON CAMP TENTATIVE TRACT 16136
SUPPLEMENTAL RARE PLANT SURVEY

I. EXECUTIVE SUMMARY

A focused rare plant survey of the Moon Camp Tentative Tract 16136 was completed for the property. This survey supplements a general botanical survey of the property conducted by Scott White Biological Consulting, dated August 2007 (White 2007, henceforth, "White survey"). The White survey positively identified one federally-listed plant species—ashy-gray Indian paintbrush (*Castilleja cinerea)*—and four special-status species: Parish's rock-cress (*Arabis parishii*), Big Bear Valley woollypod (*Astragalus* leucolobus), Heckard's paintbrush (*Castilleja montigena*) and silver-haired rattails (*Ivesia argyrocoma*) (Table 1).

This supplemental survey affirmed the presence of these species, and added two additional special-status species: purple monkeyflower (*Mimulus purpureus*) and Sugarloaf phlox (*Phlox dolichantha*); and disaffirmed presence of a list of other special-status and federally-listed plant species deemed to potentially occur on the property, according to White (Table 2).

The White survey had identified 13.81 acres of ashy-gray paintbrush habitat, distributed among four occurrences (Figure 1). This supplemental survey found the two easternmost occurrences to be erroneous. No ashy-gray Indian paintbrush plants occur at those two sites. In addition, the occupied habitat of the middle occurrence was found to cover less than one-third the estimated acreage reported by White, and the western occurrence exhibited a somewhat smaller occupied habitat footprint, but was deemed to generally conform to White's estimated acreage. Altogether, the occupied habitat of ashy-gray Indian paintbrush has been recalculated to approximately 7.71 acres.

II. PROJECT AND PROPERTY DESCRIPTION

The San Bernardino County Planning Department is reviewing an application for Moon Camp Tentative Tract 16136—a proposed 50-lot residential development on the former Moon Camp site in Fawnskin. The project site is on the north shore of Big Bear Lake, in the eastern part of the community of Fawnskin, in unincorporated San Bernardino County. The project site is comprised of about 62 acres, situated on both sides of State Highway 38, between Oriole Lane and Polique Canyon Road (on the Fawnskin USGS 7½' quadrangle map, in the north half of Section 13, Township 2N and Range 1W). The project site slopes from north to south. Elevation ranges from 6,960 feet in the northeastern portion of the site to 6,750 feet near the lakeshore (see Figures 1 and 2).

The project site occurs within an area that is described by the Open Space element of San Bernardino County's General Plan as, "This area includes the entire watershed area of Big Bear Lake, and contains a number of specialized habitat areas, which support a large number of endangered plants and animals (as well as commonly occurring mountain species). Habitat values

here should be maintained, potentially by controlling development to prevent damage to important habitat areas."

III. FOCUSED STUDY / SPECIES OF CONCERN

The White survey was conducted on three dates, April 30, June 7, and August 8, during the 2007 season. The 2007 precipitation season (measured from July 1 to June 30 annually) was a record drought year for the San Bernardino Mountains, with only 11.66 inches of precipitation recorded at Big Bear Dam, compared to an average annual precipitation of 36.00 inches. For this reason, White recommended that additional surveys be accomplished to determine presence or absence of four federally-listed endangered plant species known to occur in montane meadow habitats; and that a subsequent survey should be accomplished on site to determine presence or absence of three federally-listed species known to occur on pebble plain habitat. In addition, there are numerous other special-status plant species potentially occurring in the area , particularly annual species, that would not be identifiable during extreme drought years.

The 2008 precipitation year was average, with 35.29 inches through May this year, and flowering of both annual and perennial species exhibited good anthesis.

This report focuses on determining presence or absence of the following plant species:

Montane Meadow Species:

- San Bernardino bluegrass (*Poa atropurpurea*) (federally endangered);
- Bird-foot checkerbloom (*Sidalcea pedata*) (federal- and state-endangered);
- California dandelion (*Taraxacum californicum*) (federal-endangered); and
- Slender-petaled thelypodium (*Thelypodium stenopetalum*) (federal-endangered).

Pebble Plain Species:

- Bear Valley sandwort (*Arenaria ursina*) (federally threatened);
- Ash-gray Indian paintbrush (*Castilleja cinerea*) (federal-threatened); and
- Southern mountain buckwheat (*Eriogonum kennedyi* var. *austromontanum*) (federal-threatened).

IV. METHODOLOGY

California Department of Fish and Game field survey protocols were followed for each of the target federal-listed species considered to potentially occur on site (CDFG 2000). These protocols basically require that surveys are conducted following these guidelines: (1) conducted during flowering seasons for the special status plants known from the area, (b) were floristic in nature, (c) were consistent with conservation ethics, (d) systematically covered all habitat types on the site, and (e) are well documented by this report.

A walkover of the Moon Camp property was conducted on May 5, 12 and June 6, 2008. The May 5 and 12th surveys focused on the "meadow" habitat along the lakeshore of the Big Bear Lake reservoir; and on identification of any special-status early-blooming annual plant species. The June 6 survey focused on delineation of the ashy-gray Indian paintbrush occurrences; and on identification of late-blooming annuals and perennials.

May surveys for other projects elsewhere in Big Bear Valley (North Baldwin Lake, Pan Hot Springs, Sawmill/Sugarloaf pebble plains, Eagle Point) had indicated that all seven federal-listed species considered to potentially occur on site, according to the White survey, were observed and reliably identifiable at the time of the early May surveys; and the ashy-gray paintbrush and other potential pebble plain species were readily visible, with fully-mature inflorescences, at the time of the June survey.

Positive findings (only pebble plain-associated species, including ashy-gray paintbrush) were precisely located using a Garmin GPS; and GPS data was downloaded and displayed at the Redlands Institute GIS laboratory, and transferred to the EIR consultant, Michael Brandman Associates, to their Palm Springs office; and to the project engineer, Hicks and Hartwick Engineering, in Redlands.

The meadow habitat was carefully walked throughout its narrow distribution along the lakeshore, and any other vernal springs or areas of persistent surface soil moisture were closely examined for potential endangered meadow species; and for the presence of special-status vernal annual species, such as eye-strain monkey-flower (*Mimulus exiguus*) or yellow owl's-clover (*Castilleja lasiorhyncha*).

The White survey reported four ashy-gray paintbrush occurrences, and these were the focus of the June 6 field survey—to confirm those locations and obtain an accurate GPS delineation of the ashy-gray paintbrush distribution and pebble plain habitat on the property.

V. RARE, ENDANGERED OR SENSITIVE SPECIES AND HABITATS (RESULTS)

Endangered Meadow Species

Of the four federally-listed endangered meadow species (Section 3, above), none were identified on site; and they are not considered likely to occur on site. The lakeshore habitat is not indigenous meadow habitat, such as supports the endemic meadow flora elsewhere in Big Bear Valley (Krantz 1979, 1980, 1981a, et alus); rather, it is what this author calls "ruderal" reservoir habitat. Ruderal means, "growing where the natural vegetational cover has been disturbed by man." (Webster's 9th Collegiate Dictionary) In this case, the ruderal reservoir habitat is comprised of a mix of native and non-native, aquatic and semi-aquatic plant species, existing in the zone between the high water level of the reservoir and the draw-down area. Native meadow species sometime occur along the narrow margin just above the high water level, but in the case of the Moon Camp property, this is very limited to a strand of willows (*Salix scouleriana)* and a non-diverse assemblage of common wetland species, such as wiregrass (*Juncus balticus*), yarrow (*Achillea millefolium*) and silver-leaved cinquefoil (*Potentilla anserina*).

No endangered, threatened, or special-status meadow plant species were identified on the Moon Camp property, and the potential for any occurrence of such species is considered to be extremely low.

Pebble Plain Species

The White survey had previously mapped a known pebble plain occurrence on the western portion of the property. This pebble plain contains many of the characteristic species occurring on other pebble plains in Big Bear and Holcomb Valleys, but for the Kennedy's southern mountain buckwheat (*Eriogonum kennedyi* var. *austromontanum*), which is replaced by the closely-related taxon, Wright's matting buckwheat (*Eriogonum wrightii* var. *subscaposum*), and absence of Bear Valley sandwort (*Arenaria ursina*). Kennedy's southern mountain buckwheat and Bear Valley sandwort were used as indicator species of pebble plains by the author, during his original systematic surveys of this endemic plant community (Krantz 1981b, 1983). The lack of both indicator species on the Moon Camp property resulted in this area not being indicated as pebble plain habitat during those initial surveys. However, the area indicated as "pebble plain" within Open Space Lot A has many other species commonly associated with true pebble plain habitat, and has been mapped as such on Figure 3.

Ashy-gray paintbrush (*Castilleja cinerea*) had been mapped as four distinct occurrences by White, but the author, in conjunction with this survey, found that the two eastern occurrences, indicated as occurring behind (north of) Lots 22, and 29-30-31 of the adjacent existing residential tract, do not support any ashy-gray paintbrush plants. There were openings of Wright's matting buckwheat at these locations, with silver rat-tails (*Ivesia argyrocoma*), which is sometimes associated with pebble plains, and Heckard's paintbrush (*Castilleja montigena*) was found on the perimeter of the openings, but no ashy-gray paintbrush exists at those locations. To verify that the author was, indeed, at the proper locations, the areas considered to be concurrent with those areas indicated by White were delineated with GPS data points to confirm the negative findings.

Similarly, the GPS delineation of the middle ashy-gray paintbrush occurrence was found to be less than one-third the size of the occupied habitat indicated in the White survey (0.11-acre actual occupied habitat, consisting of approximately 50 plants). This occurrence corresponds to the

southernmost portions of proposed Lots 47 and 48, adjoining Highway 18. In this case, it appeared that White had mapped the Wright's matting buckwheat distribution, without regard to association with the ashy-gray paintbrush.

Another very small ashy-gray paintbrush occurrence was located at the rear of Lot 49, comprised of 0.01-acre, and consisting of 10 plants.

A single point, representing three ashy-gray paintbrush plants, was located at the vernal spring on the rear portion of Lot 50; and the easternmost portion of the primary pebble plain occurrence on Lot A extends into Lot 50 on its southwestern quarter, comprising about 0.11-acre of occupied habitat.

The primary pebble plain (the westernmost occurrence according to White) was found to be more restricted than indicated by White at the eastern portion of the occurrence on Lots 49 and 50, but generally conformed to the area indicated by White in the area of the central pebble plain (within the proposed rare plant preserve) and toward the western portion of the pebble plain and ashy-gray paintbrush area. The actual occupied habitat of ashy-gray paintbrush on Lots 1 through 5 was calculated to comprise 2.07 acres.

The most exemplary pebble plain habitat on the Moon Camp property was found to conform to the area indicated by White, and would be entirely included within the proposed 4.2 acre conservation easement area. Fencing of the highway frontage has stopped the unauthorized off highway vehicle use that was evidenced on the pebble plain habitat from years past.

To summarize the results of the survey of ashy-gray paintbrush occupied habitat, it is distributed among four occurrences: Lot 47—0.11 acre, Lot 49—0.01 acre, Lot 50—0.11 acre, and the pebble plain and more extensive western occurrence, comprising 4.91 acres within Lot A, 2.07 acres within Lots 1-5, and 0.5 acre within Road A, for a total of 7.7 acres of occupied ashy-gray paintbrush.

Other Special Status Species

Two new special status species were added to the project list: purple monkeyflower (*Mimulus purpureus*) and Sugarloaf phlox (*Phlox dolichantha*). Purple monkeyflower was found to be rather widely distributed on the pebble plain and extending down into the draw to the east, corresponding to the southern half of proposed Lot 50. This draw exhibited vernal spring habitat characteristics; that is, an association of very tiny, ephemeral annuals, such as moss juncus (*Juncus bryoides*), hispid popcorn flower (*Plagiobothrys hispidulus*) and other minute monkeyflower species, such as *Mimulus androsaceus* and *M. suksdorfii*. Most of the purple monkeyflower distribution is included within the proposed 4.2 acre conservation easement area.

Sugarloaf phlox was found to be rather widely distributed on the Moon Camp property in open black oak woodland and under Jeffrey pines. Although restricted to Big Bear and Holcomb Valleys, its regional distribution extends up to the summit of Sugarloaf Mountain south of Big Bear Valley, and as far north as White Mountain, northwest of Holcomb Valley; the taxon is fairly common within its range, and is not considered to be a high priority candidate for listing or more formal protection (Krantz 1983).

Table 1: Special Status Species Occurring on the Moon Camp Property

Arabis parishii	Parish's rock-cress	Fed.: none; S2.1; List 1B.2
Astragalus leucolobus	Bear Valley woollypod	Fed.: none; S2.2; List 1B.2
Castilleja cinerea	Ashy-gray Indian paintbrush	Fed.Threatened; S2.2; List 1B.21B, 2-2-3;
Castilleja applegateii Ssp. *martinii*	Mountain paintbrush	Fed: none; S3.3; List 4.3
Ivesia argyrocoma	Fuzzy rat-tails	Fed: none; S2.2; List 1B.2
Mimulus purpureus	Purple Monkeyflower	Fed: none; S2.2; List 1B.2
Phlox dolichantha	Sugarloaf phlox	Fed: none; S2.2; List 1B.2

Fed. (Federal Rank)
State Rank (S), California Natural Diversity Database
- **S1**: Fewer than six occurrences or fewer than 1000 individuals or less than 2000 acres
- **S1.1**: Very threatened
- **S1.2**: Threatened
- **S1.3**: No current threats known
- **S2**: 6-20 occurrences or 1000-3000 individuals or 2000-10000
- **S3**: 21-100 occurrences or 3000-10000 individuals or 10000-50000 acres
- **S4**: Apparently secure in California; this rank is clearly lower than S3, but factors exist to cause some concern, *i.e.*, there is some threat or somewhat narrow habitat. No threat rank.
- **S5**: Demonstrably secure or ineradicable in California. No threat rank.

Table 2: Threatened or Endangered Species Determined Not to Occur On Site

Federal Threatened—FT
Federal Endangered—FE

Arenaria ursina	Bear Valley sandwort	FT
Eriogonum kennedyi var. *austromontanum*	Southern mountain buckwheat	FT
Poa atropurpurea	San Bernardino bluegrass	FE
Sidalcea pedata	Bird-foot checkerbloom	FE
Taraxacum californicum	California dandelion	FE
Thelypodium stenopetalum	Slender-petaled thelypodium	FE

VI. RECOMMENDATIONS

A. Establishment of a Conservation Easement and Rare Plant Habitat Preserve

A 4.91-acre rare plant preserve is proposed to be established over the pebble plain habitat. As indicated on the Tentative Tract map, this preserve will protect the most exemplary and best quality of the pebble plain habitat on site, including all seven of the special status species observed on site. A detailed management plan for the preserve area shall be adopted and recorded with the conservation easement, specifying the terms and conditions for allowed and disallowed uses within the preserve area.

The conservation easement shall be conveyed to the San Bernardino Mountains Land Trust or other land stewardship entity, together with a management endowment to cover annual costs of maintenance (replacing signs, mending fences). Interpretive literature, signs, and trails shall be developed for homeowners and visitors to provide an understanding of the sensitive resources occurring in the preserve area.

B. Building Envelopes for Paintbrush Habitat

Construction to the rear portions of Lots 47, 48, 49 and 50 shall be restricted by means of building envelopes or building setback lines, to prevent construction in the occupied ashy-gray paintbrush habitat. The rear portions of these lots abut the Highway 38 frontage, in any case, and are thus largely within the Caltrans right of way and required rear lot setbacks. Lot 50 is constrained by a drainage easement along the eastern length of the parcel, by the Caltrans right-of-way along the highway, and by pebble plain resources.

C. Offsite Compensation for Paintbrush Habitat

Off-site compensation for direct and indirect impacts to ashy-gray Indian paintbrush and pebble plain habitat outside of the 4.91-acre Conservation Easement and not protected by building setbacks (2.57 acres) may be accomplished by acquisition and protection of similar or better habitat resources elsewhere in the valley.

There is a limited amount of privately-held ashy-gray paintbrush and pebble plain habitat available for off-site mitigation. One of the best remaining examples of pebble plain habitat in private ownership that may be used to off-set impacts on the Moon Camp property is the "Sugarloaf pebble plain", situated at the northern terminus of Dixie Lee Lane in the unincorporated community of Sugarloaf. This is a 10-acre, high-quality pebble plain. It was fenced and has been protected from off-highway vehicles since the mid-1980s as a mitigation for construction of the Big Bear High School, the intention being to set aside a 2-acre portion of the 10-acre parcel as mitigation for impacts to pebble plains resources for the High School site, and use the remaining eight acres for mitigation of other projects. The parcel was surveyed by Hicks & Hartwick, but was never formally recorded.

The proposal for off-site mitigation of direct and indirect impacts to ashy-gray paintbrush and pebble plains resources on the Moon Camp property is to acquire fee title interest of the entire Sugarloaf Pebble Plain parcel (less a proposed road easement to accommodate the County's

westerly extension of Baldwin Lane); record the parcel, and convey a Conservation Easement to a responsible stewardship entity, such as the San Bernardino Mountains Land Trust (SBMLT). The conveyance of the easement shall be accompanied by a habitat management and monitoring endowment to be deposited into an escrow account for that purpose. In addition to the initial deposit to establish the habitat management account, Homeowner's Association fees shall be collected annually to provide funding in the long-term. Management guidelines, terms and conditions of the conservation easement shall be clearly defined in a Habitat Management Plan, to be recorded with the easement. These management conditions shall include maintenance of fencing and signs, maintenance of the trail across the pebble plain, and development of interpretive materials for the pebble plains resources.

D. Onsite Management

Impacts to the pebble plains habitat and sensitive plants will be minimized by the project's design, which will place the pebble plain area, including ashy-gray Indian paintbrush habitat and all six special-status species, into a permanently protected Conservation Easement. The long-term conservation value of the proposed open space requires active onsite land management to prevent "edge effects" from existing and proposed adjacent land uses.

A habitat management plan (HMP) should be developed for the Conservation Easement area. The HMP shall address management of the rare plant preserve with respect to the following indirect impacts:

- Removal and control of invasive non-native plants;
- Trampling or soil damage caused by foot traffic, vehicles, bicycles, or other recreation;
- Alteration of surface hydrological conditions caused by irrigation on adjacent lots, road runoff, or water diversions installed for erosion control;
- Vegetation clearing, especially for fuel modification to reduce fire hazards to adjacent homes; and

The HMP shall be administered by the SBMLT or other land stewardship entity. Funding for implementation of habitat management measures shall be derived from interest earned from the habitat management endowment and from annual Homeowner's Association fees.

VII. REFERENCES

California Department of Fish and Game. 2000. Guidelines for assessing the effects of proposed projects on rare, threatened, and endangered plants and plant communities. Unpublished. California Department of Fish and Game, Sacramento, California.

California Department of Fish and Game. 2007. California Natural Diversity Database, List of special plants. Heritage Section, California Department of Fish and Game, Sacramento, CA.

California Native Plant Society (CNPS). 2007. Electronic Inventory of Rare and Endangered Vascular Plants of California. Record search for special status plants on the USGS Fawnskin, Big Bear City, Big Bear Lake, Butler Peak, Keller Peak, and Moonridge quads. California Native Plant Society, Sacramento, California.

Derby, J.A. and R.C. Wilson. 1978. Floristics of pavement plains of the San Bernardino Mountains. Aliso 9:374-378.

Derby, J.A. and R.C. Wilson. 1979. Phytosociology of pavement plains of the San Bernardino Mountains. Aliso 9:463-474.

Hickman, J. C. 1993. The Jepson Manual: Higher Plants of California. University of California Press, Berkeley, California.

Krantz, T. No date. A Guide to the Rare and Unusual Wildflowers of the Big Bear Valley Preserve. Friends of the Big Bear Valley Preserve, Big Bear City, California.

Krantz, T. 1979. A botanical investigation of *Sidalcea pedata.* Report prepared for the San Bernardino National Forest, San Bernardino County, CA. 21pp.

Krantz, T. 1980. *Thelypodium stenopetalum,* a botanical survey of the species throughout its range. Report prepared for the San Bernardino National Forest, San Bernardino County, CA. 44pp.

Krantz, T. 1981a. The Bear Valley bluegrass, *Poa atropurpurea,* a survey of the taxon in the San Bernardino Mountains. Report prepared for the San Bernardino National Forest, San Bernardino County, CA. 40pp.

Krantz, T. 1981b. A survey of two pavement plains endemics: the Bear Valley sandwort, *Arenaria ursina,* and Big Bear buckwheat, *Eriogonum kennedyi austromontanum*; a study of the taxa throughout their ranges. Report prepared for the San Bernardino National Forest, San Bernardino, CA. 79pp.

Krantz, T. 1983. *Phlox dolichantha,* the Sugarloaf phlox: a botanical survey of the species throughout its range. Report prepared for the San Bernardino National Forest, San Bernardino, CA. 20pp.

Krantz, T. 1994. Phytogeography of the San Bernardino Mountains, San Bernardino County, California. PhD dissertation, UC Berkeley.

Krantz, T., A.C. Sanders, and R.F. Thorne. 2008. Vascular Plants of the San Bernardino Mountains. Unpublished working draft manuscript.

Michael Brandman Associates. 2000. Biological assessment of the Moon Camp property site in Fawnskin, California. Unpublished report prepared for Urban Environs, Redlands, California.

San Bernardino National Forest. 1990. Pebble plain habitat management guide and action plan. Unpublished report on file at San Bernardino National Forest Supervisor's Office, San Bernardino, California.

Sawyer, J.O. and T. Keeler-Wolf. 1995. Manual of California Vegetation. California Native Plant Society, Sacramento.

Tibor, D. 2001. Inventory of Rare and Endangered Plants of California. Special Publication No. 1, 6th Ed., California Native Plant Society, Sacramento, California.

USDI Fish and Wildlife Service. 1984. Endangered and threatened wildlife and plants; determination of endangered status for *Thelypodium stenopetalum* (slender-petaled thelypodium) and *Sidalcea pedata* (pedate checker-mallow). Federal Register 49:34497-34500. (31 Aug).

USDI Fish and Wildlife Service. 1998. Endangered and threatened wildlife and plants; final rule to determine endangered or threatened status for six plants from the mountains of southern California. Federal Register 63:49006-49022 (14 Sep; *Poa atropurpurea, Taraxacum californicum, Arenaria ursina, Castilleja cinera, Eriogonum kennedyi* var. *austromontanum*).

USDI Fish and Wildlife Service. 2006 (12 Sep). Endangered and threatened wildlife and plants; review of native species that are candidates or proposed for listing as endangered or threatened. Federal Register 71:53756-53835.

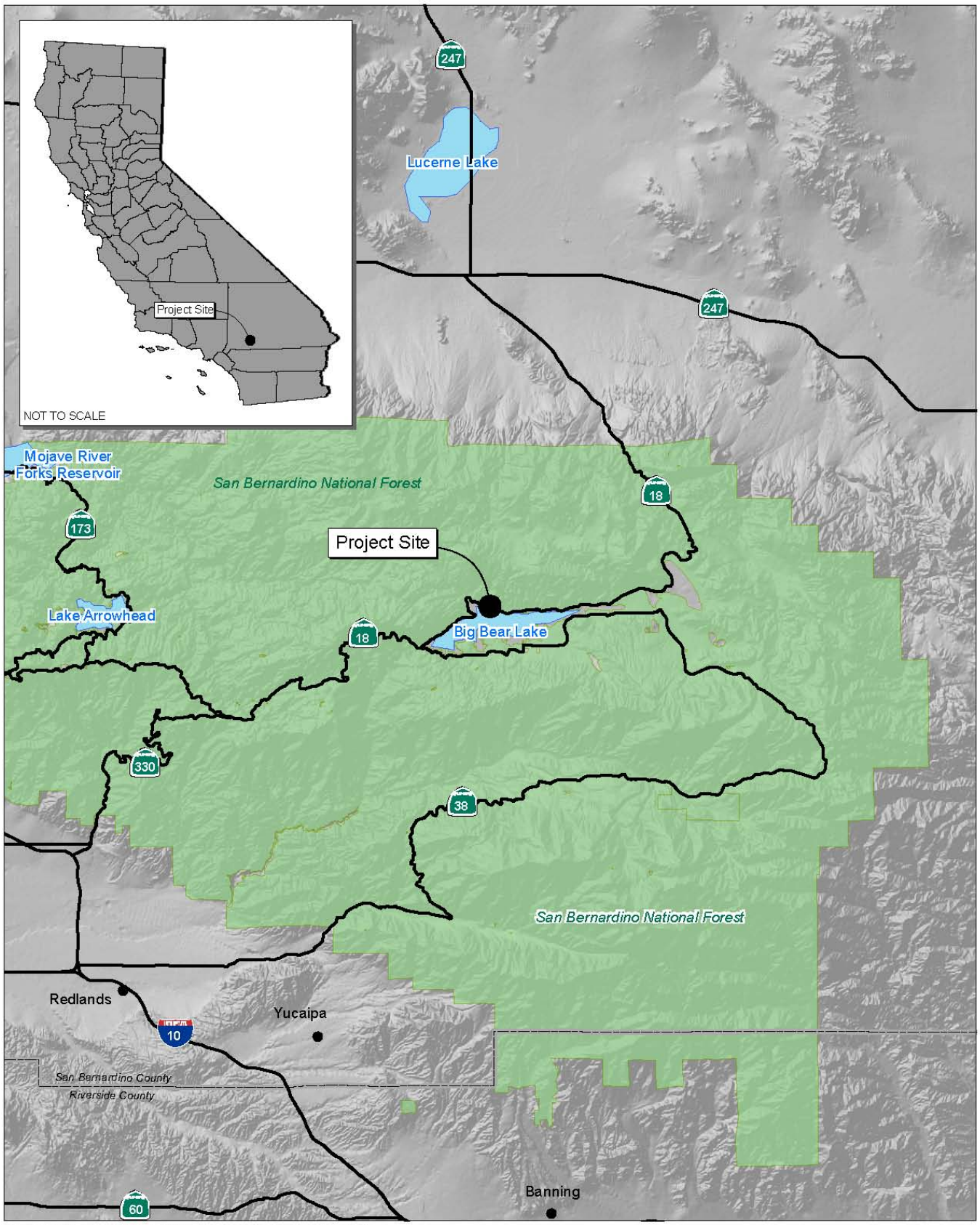
Scott White Biological Consulting. 2007. Moon Camp property, Fawnskin area: vegetation and special status plants. Preliminary draft, dated August, 2007, prepared for Michael Brandman Associates. 14pp.

White & Leatherman BioServices. 2002. Moon Camp Site: Vegetation and Special Status Plants. Unpublished report prepared for BonTerra Consulting, Costa Mesa, California.

VIII. CERTIFICATION

I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this supplemental rare plant survey, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Field work conducted for this assessment was performed by me. I certify that I have not signed a nondisclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.

DATE: June 29, 2008 SIGNED: 



Source: Census 2000 Data, The CaSIL, MBA GIS 2007.

NORTH

5 2.5 0 5 Miles

Michael Brandman Associates

00520089 • 07/2009 | 1_Krantz_regional.ai

Figure 1
Regional Location Map

MOON CAMP TENTATIVE TRACT 16136
FOCUSED RARE PLANT SURVEY

Source: Hicks & Hartwick, Inc. (July, 2009).

NORTH

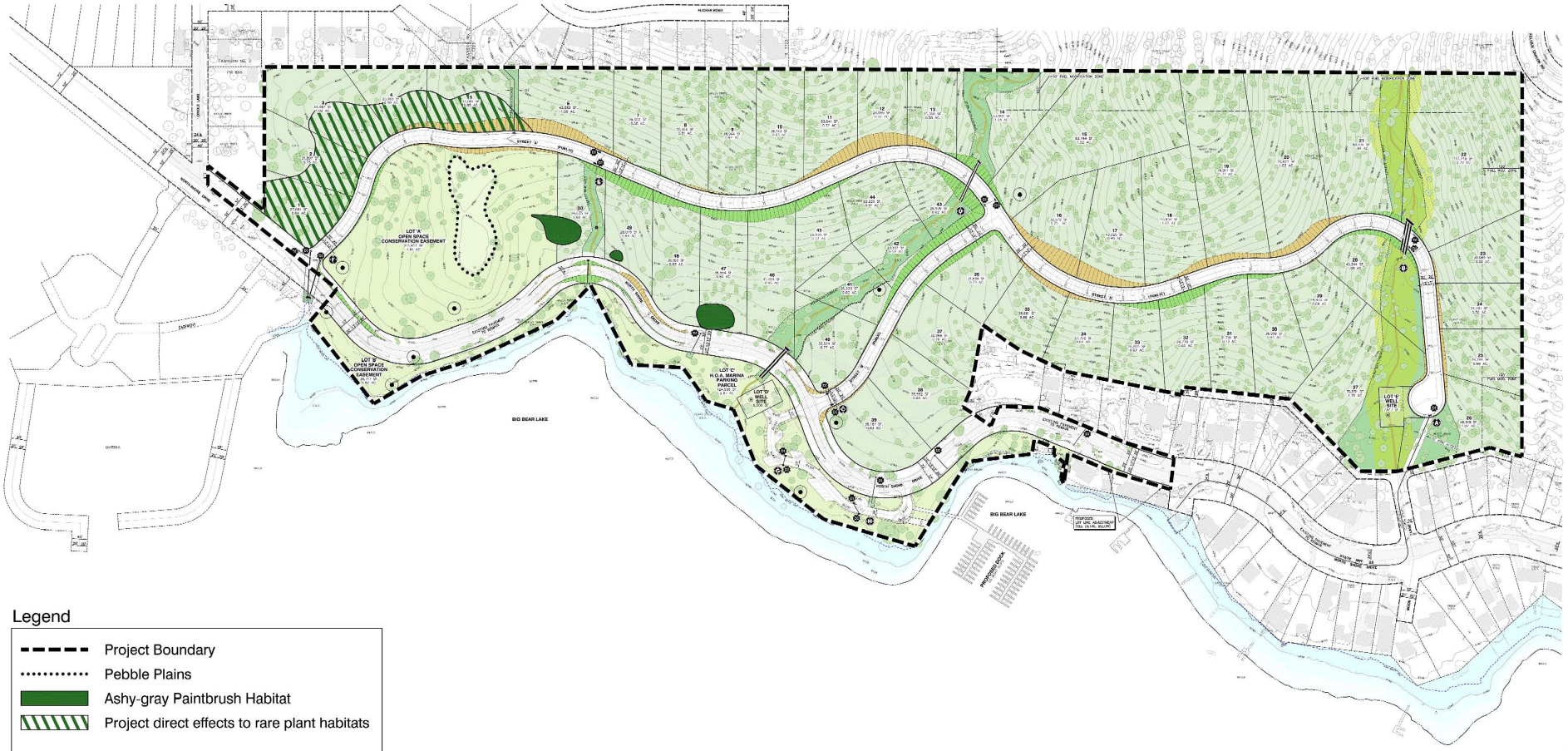
260 130 0 260 Feet

Michael Brandman Associates

00520089 • 07/2009 | 2_Krants_ttm16136.ai

Figure 2
Project Map

MOON CAMP TENTATIVE TRACT 16136
FOCUSED RARE PLANT SURVEY



Source: Hicks & Hartwick, Inc. (July, 2009) & Tim Krantz, Ph.D (July, 2009).

NORTH

260 130 0 260 Feet

Michael Brandman Associates

00520089 • 07/2009 | 3_Krants_Pebble_Plain.ai

Figure 3
Map of Pebble Plain and Ash-gray Paintbrush Habitat

MOON CAMP TENTATIVE TRACT 16136
FOCUSED RARE PLANT SURVEY