

Exhibit C

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FRED BALLERINI
BIOLOGICAL AND HORTICULTURAL SERVICES

October 25, 2023

To: Mike Linder
 Land Use Consultant
 PO Box 695
 Big Sur, CA 93920

RE: Biological Resource Review for Replacement Well Permit
APN 419-271-001
Balbir S. Rataul
46820 Clear Ridge Road
Big Sur, CA 93920

Dear Mr. Linder,

Per your request, I visited the subject parcel located at the 46820 Clear Ridge Road in Big Sur, to review the biological resources on the subject parcel in relation to a proposed Replacement Well Development.

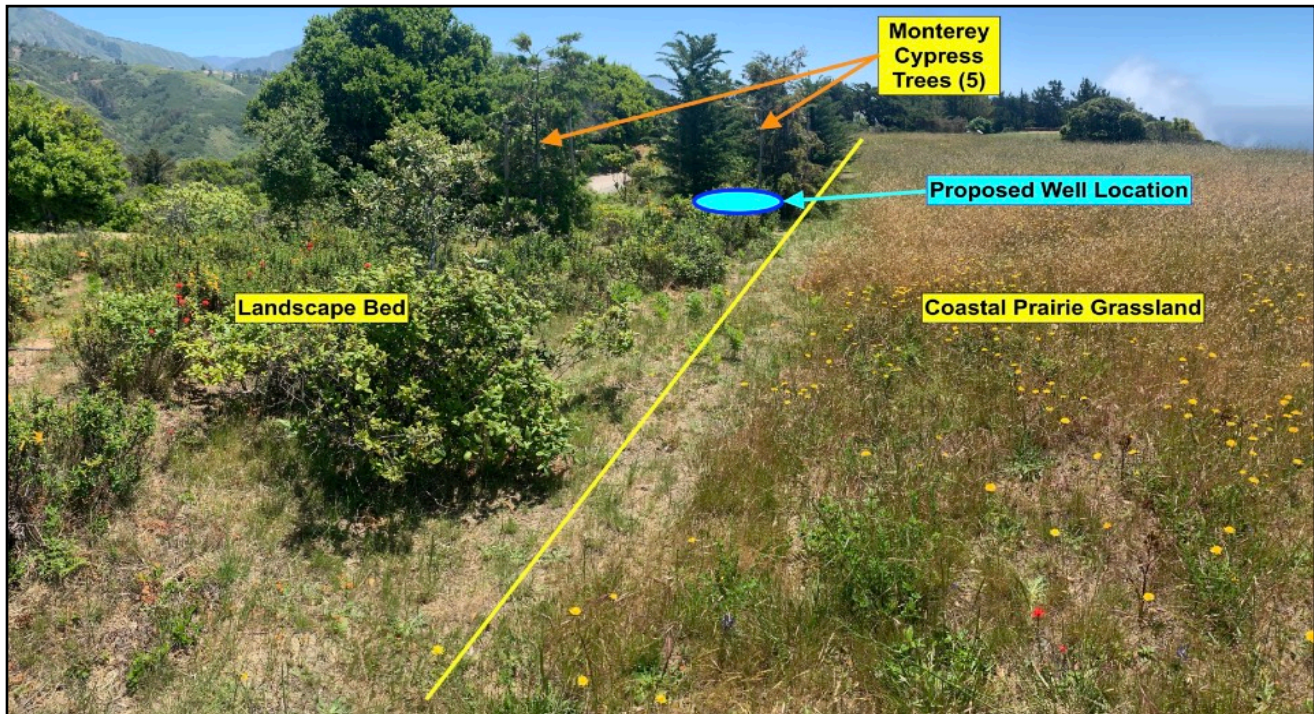
The purpose of this 7-page assessment is to document the findings of a biological survey conducted within the project area and to provide recommendations to minimize potential well development impacts to a less than significant level. Seven observational site visits were conducted over several months starting with Spring Surveys in May 2023 and a final visit on October 17, 2023 to analyze biological resources in relation to the proposed replacement well project.

The Big Sur Coast Land Use Plan (LUP), the California Natural Diversity Data Base (CNDDDB) maintained by the State of California Department of Fish and Wildlife (DFW), the United States Fish and Wildlife Service Information for Planning and Consultation database (USFWS IPaC), and the California Native Plant Society Rare Plant Rank database (CRPR) were utilized to determine known populations of Federal, State, and locally listed rare, threatened and endangered habitat, plant and wildlife species on or in the vicinity of the subject project site located in the Big Sur USGS 7.5 Quadrangle. In addition, a previous biological report on file with Monterey County (Ref. Biological Report authored by Jeff Norman, August 15, 1994) and personal history from past site visits of the parcel were utilized for the site assessment.

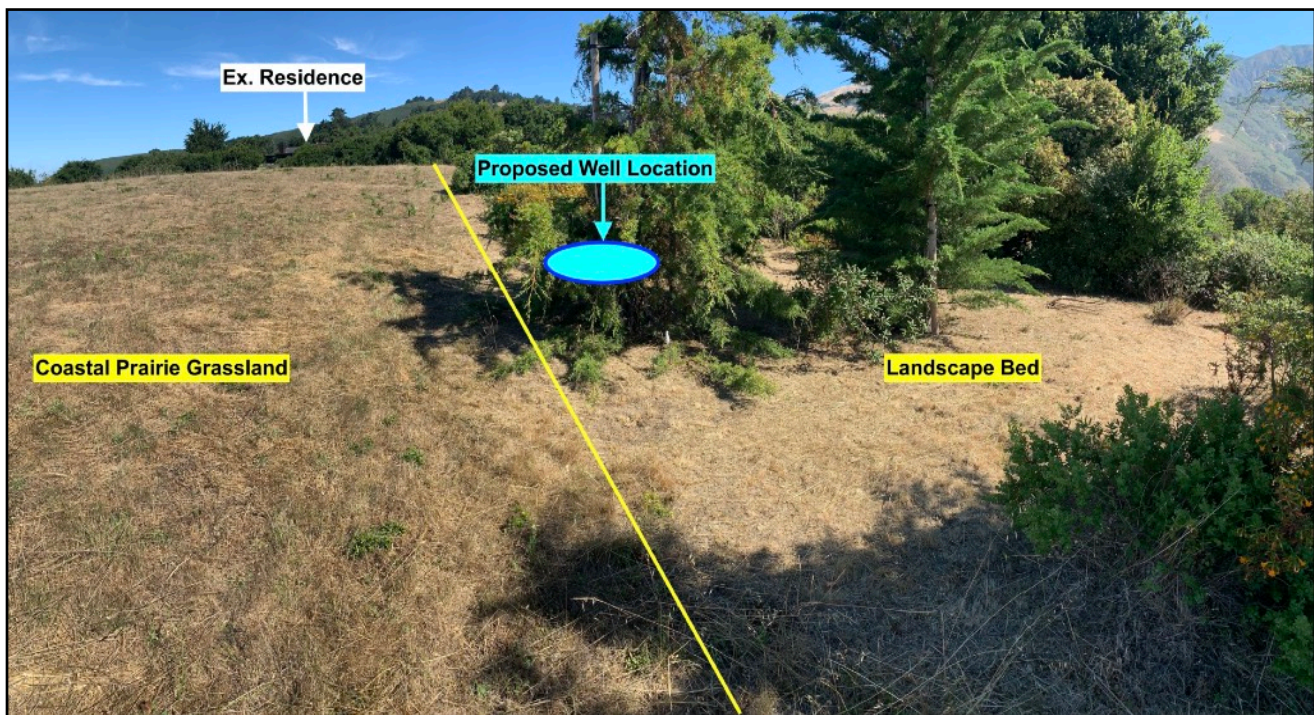
Findings:

The 60-acre residential parcel lies within several habitat types including *Coastal Sagebrush Scrub*, *Oak Woodland*, *Central Maritime Chaparral (ESHA)*, *Redwood Forest (ESHA)* and *Coastal Prairie Grassland (ESHA)*. The proposed replacement well location is currently sited adjacent to the ecotone border between the Coastal Prairie Grassland and a landscape-planted road easement strip along Clear Ridge Road at the southern area of the parcel. The 30-foot wide, drip-irrigated landscaped easement runs along the the west side of Clear Ridge Road through the length of the parcel from the southern property boundary northward 600+ feet to the existing residence. The landscaped easement is planted with native shrub cultivars and drought tolerant shrubs and trees, including imported Monterey cypress trees (native to Monterey County but not indigenous to the Big Sur area).

In an effort to minimize potential impacts to the adjacent sensitive grassland community, a site meeting was conducted on July 31, 2023 with the biologist and the hydrogeologist (Aaron Bierman) to field-site the proposed well location and strategize placement of the drill truck staging and spoils retention pit. Several challenges to the well siting placement were considered prior to establishing the final location, including maintaining regulatory setbacks from existing septic fields on the subject and neighboring parcels, avoiding soil disturbance of existing coastal prairie grassland, avoiding removal of naturally occurring indigenous trees, and minimizing disturbance to existing native plant communities along the ridge line property. Drilling methodologies (mud drilling versus air drilling) were also assessed in determining the appropriate techniques and protocols to reduce potential impacts to grassland habitat.



Well site location (facing south). May 18, 2023



Well site location (north facing). July 31, 2023

Coastal Prairie Grasslands (natural grasslands) are recognized as environmentally sensitive habitat (ESHA) under the provisions of the Big Sur Coast LUP (Ref. Policy 3.3.3.A.7) and recognized as "rare and worthy of consideration" by the California Department of Fish and Wildlife. The *Coastal Prairie Grassland* extends for approximately one-acre along the north to south ridge line of the parcel and contains a rich assemblage of native bunch grasses and forb species. Co-dominant species including California oatgrass (*Danthonia californica*), foothill needlegrass (*Stipa lepida*), and purple needlegrass (*Stipa pulchra*) are the foundational grasses along with other supporting native bunch grasses that include blue wildrye (*Elymus glaucus*), California brome (*Bromus carinatus*) and creeping red fescue (*Festuca rubra*). The associated herbaceous alliance scattered across the grassland includes California buttercup (*Ranunculus californicus*), soap plant (*Chlorogalum pomeridianum*), blue-eyed grass (*Sisyrinchium bellum*), Monterey paintbrush (*Castilleja latifolia*), white globe lily (*Calochortus albus*), yarrow (*Achillea millefolium*), Fremont's star lily (*Toxicoscordion fremontii*), pretty face (*Triteleia ixiodes*), and other spring flowering annual taxa observed during spring surveys.

The grassland natural community extends northward uphill from the southern property boundary towards the existing residence and terminates at the existing well head, approximately 250-feet south of the residence. The *Coastal Prairie Grassland* habitat at one time extended northward to the edge of the existing residential structure (Ref. Biological Report authored by Jeff Norman, August 15, 1994). Within the past several years, approximately 25,000 SF of the native grassland has been removed and a non-native manicured lawn and irrigation system have been installed, thereby significantly displacing and reducing the ESHA habitat on the parcel. Additionally, recent landscaped tree installations (within the past 5 years), including Monterey Cypress (*Hesperocyparis macrocarpa*), coast redwood (*Sequoia sempervirens*), and the non-native deodar cedar (*Cedrus deodara*), have been introduced in groupings throughout the grassland habitat and have further fragmented the historical extension of the grassland. The western road easement of Clear Ridge Road has also been landscaped in locations where the 1994 Norman report had documented grassland habitat as occurring. Collectively, these recent habitat conversion impacts have resulted in a loss of approximately 50% of the historical grassland area on the parcel since 1994.

The endemic and rare species Hutchinson's Larkspur (*Delphinium hutchinsonae*), a California Rare Plant Rank 1B.2 species, was historically noted persisting on the parcel where the existing main residential driveway is now sited though no evidence of the larkspur was noted in the area during several spring surveys spanning multiple years of survey observations and it is assumed unlikely to occur in this newly landscaped lawn and landscaped area.

The parcel lies within the federally designated critical habitat range for the California red-legged frog (*Rana draytonii*), although no aquatic breeding, aquatic non-breeding or upland habitat is present within or near the proposed well area. The parcel is within the known dispersal range for this species, and though potential is considered low for the species to utilize the well area, there is potential for the species to migrate through the area for dispersal habitat. Recommendations are included below to conduct a survey prior to mobilization of the well drilling trucks in order to avoid the take of the listed species.

Impacts and Recommendations:

The proposed replacement well location has been coordinated and sited to avoid direct soil disturbance impacts to nearby sensitive coastal prairie grassland, though drilling impacts will be in close proximity (approximately 5 to 10 feet) to the grassland. The drill rig and tender truck staging for drilling will be partially sited on the grassland ecotone, though any temporary staging of trucks is not anticipated to have long term significant impacts to the functionality of the grassland habitat as no ground disturbance is proposed in the grassland. Landscape vegetation, including shrub constituents and five (5) introduced boxed Monterey cypress trees, along the road easement will be removed to accommodate the truck staging, drilling operations and soil staging. Drilling rig ingress and egress access and staging shall occur within the road easement landscaped area after landscape plantings are removed. Well tailings shall be deposited into the specified retention pit located in the easement landscaped area (see Mud System location on Well Siting Map included below). The retention pit is

specified to be lined with straw bales and silt fencing to capture and retain mud spoil solids. Well spoils, estimated at 5-10 cubic yards of material, generated from the mud drilling are proposed to be hauled off site to a receiver site along Clear Ridge Road where staged soils in road pullouts are routinely utilized for road fill projects. Slurry fluids are anticipated to filter downslope south through the landscaped easement. Indirect impacts resulting from slurry fluid runoff to native habitat constituents is determined to be less than significant with the implementation of sediment control devices integrated into the project. All disturbed soils within the easement area shall be seeded and mulched using native coastal prairie grassland seeding utilizing site-identified California grass and forb seed as specified in the below listed recommendations (Ref. Recommendation h. below) and sterile rice straw mulching.

With the integration of the recommendations below, the project is consistent with regulations for development adjacent to environmentally sensitive habitats (Ref. Section 20.145.040 CIP) and the replacement well development impact is reduced to a level at which the long term maintenance of the habitat is assured as no disruption/soil disturbance to native grassland ESHA habitat is proposed.

The following measures are recommended to reduce potential biological impacts from the proposed emergency well development to a less than significant level.

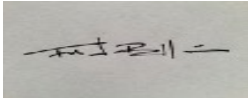
- a. Prior to mobilization of the drilling equipment, the landscape shrubs and boxed cypress trees along the landscaped road easement shall be removed (cut to ground level) in the location of the drilling and staging work zone. Materials should be hauled off site and responsibly disposed in green waste facility for composting.
- b. The applicant/well contractor shall consult with the project biologist during the day of mobilization to field adjust the appropriate drilling point as well as the boundary of the work zone in the staging and drilling area to avoid ESHA grassland impacts.
- c. Prior to mobilization, temporary construction fencing shall be installed and maintained along the western boundary of the work zone to protect the ESHA grassland that lies adjacent west of the drilling point from potential construction related impacts.
- d. Install erosion & sediment control devices as necessary along downhill perimeters to prevent any off-site impacts (sedimentation deposits) to native coastal prairie grassland plant community to the west of the proposed well development.
- e. To avoid potential impacts to California red-legged frogs, the qualified project biologist shall provide 'contractor education' for all drill equipment personnel involved with the project. A pre-construction survey by the qualified biologist shall take place the day of landscape vegetation removal and the day of equipment mobilization. The biologist shall submit a certification letter to the HCD-Planner to document the training and pre-construction survey results. If any such frog is observed within the work zone, all work shall cease immediately and the project biologist shall contact the ULFWS for consultation.
- f. Mobilize drilling and excavation equipment into project location using egress and ingress routes through existing landscape easement areas adjacent to Clear Ridge Road. Use of heavy equipment and parking/staging shall be restricted to areas within the replacement well drilling area (landscaped easement) and excluded from any coastal prairie grassland areas. There may be partial truck staging on the grassland during drilling operations and the biologist shall coordinate (on the day of mobilization) with drilling operators on parking/staging locations.
- g. Annual grassland mowing around the approved replacement well zone should be conducted prior to equipment mobilization to reduce fuel loads in the work area and reduce fire risk during drilling. *(This specific task has already been implemented in the summer of 2023 with seasonal fire clearance actions, though may be necessary again if project delays are anticipated to extend the project beyond the upcoming winter growing season).*
- h. All exposed bare soils in the landscape easement area resulting from the test well installation should be restored with coastal prairie grassland constituents and stabilized with an organic mulching (sterile rice straw or other). Native *Coastal Prairie Grassland* seed mix to include the following ratio with a rate of 50-lbs per acre:

Achillea millefolium	5%	Lupinus nanus	5%
Danthonia californica	20%	Melica californica	5%
Elymus glaucus	15%	Sisyrinchium bellum	5%
Eschscholzia californica	5%	Stipa lepida	10%
Festuca idahoensis	10%	Stipa pulchra	15%

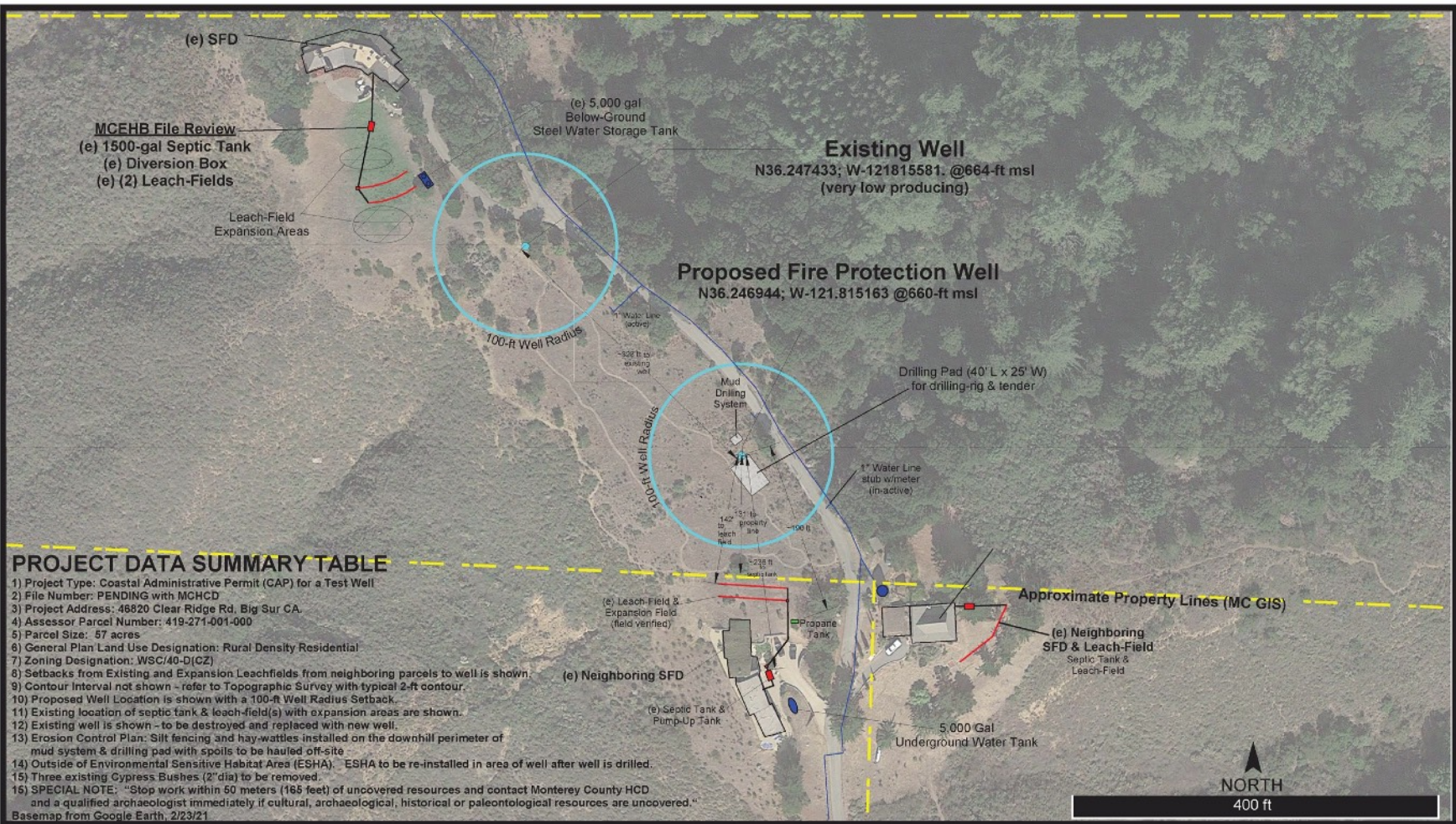
- i. After completion of the well installation, the applicant shall provide the HCD-Planner with written certification by the qualified project biologist that all required protection measures remained in place during the drilling activities and that adverse impacts to the grassland have been avoided. Failure to avoid significant impacts to grassland habitat shall require notice to the HCD-Planner and the project will be assessed with mitigation restoration compliance actions for any corrective measures as needed.

Please phone or email if you have any questions or require further analysis.

Sincerely,



Fred Ballerini
Consulting Biologist



WELL SITING MAP

APN: 419-271-001-000
46820 CLEAR RIDGE ROAD
BIG SUR, MONTEREY COUNTY, CALIFORNIA

FIGURE
2

AB: 7/06/2023; Revised 7/31/23
Release/Figures/Not Sting Map

Project Location



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