

MEMORANDUM

TO:	Tyler Rogers	FROM:	Justin Semion
CC:			
DATE:	September 9, 2024		
SUBJECT:	Cormorant Energy Storage Project Constraints Assessment		

1.0 PURPOSE

The purpose of this report is to provide an analysis of biological resources at the Cormorant Energy Storage Project site (Project Area) and a buffer around portions of the Project Area (Study Area) in Daly City, San Mateo County, California. The report will address the questions in the California Environmental Quality Act (CEQA) Environmental Checklist (Appendix G of the CEQA Guidelines) and will be suitable for use for CEQA documentation.

2.0 BACKGROUND AND EXISTING CONDITIONS

The approximately 12-acre Project Area is situated within a heavily urbanized area and is surrounded on all sides by industrial, commercial, or residential uses. It consists of two primary areas:

- an approximately 12-acre, partially vacant lot (Main Parcel) used for light industrial purposes that is located immediately to the west of the Cow Palace Arena & Event Center Property. It is bordered by eucalyptus groves that, on the southern and western boundaries, abut ruderal scrub vegetation. Access is from Carter Street
- a transmission line that would follow one of three potential alignments from the Main Parcel to the PG&E Martin Substation.

The Study Area evaluated for this report is inclusive of the Project Area, an additional area along the northern and northwestern boundaries of the Main Parcel, and three potential transmission line alignments.

3.0 PROJECT DESCRIPTION

The proposed project will be known as the Cormorant Energy Storage Project (Project), which will be composed of lithium-ion batteries installed in racks, inverters, medium-voltage transformers, switchgear, a collector substation, and other associated equipment to interconnect into the PG&E Martin Substation. The proposed facility will provide a service to the regional electric grid by receiving energy (charging) from the PG&E electric transmission system, storing energy on-site, and then later delivering energy (discharging) back to the point of interconnection. Following construction, the proposed use will not create emissions to air, will not require sanitary facilities, and will not require water. Potential environmental impacts under CEQA caused by the construction of this facility are evaluated in Section 7.0 below.

The storage facility housing the lithium-ion batteries and substation would connect to the PG&E Martin Substation via a 115 kilovolts (kV) transmission line. The transmission line would follow one of three potential alignments to the PG&E Martin Substation. All three alignments would be entirely underground (see Figure 1).

4.0 METHODS

This evaluation is based on a review of literature and database sources as well as a site visit completed by WRA, Inc. (WRA) on April 6, 2023. Prior to the site visit, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive land cover types (e.g., wetlands) and special-status species (e.g., endangered plants), including:

- SoilWeb (CSRL 2023)
- Hunters Point, San Francisco North, and San Francisco South 7.5-minute quadrangles (USGS 2021a-c)
- Contemporary aerial photographs (Google Earth 2023)
- Historical aerial photographs (NETR 2023)
- National Wetlands Inventory (USFWS 2023a)
- California Natural Diversity Database (CNDDDB; CDFW 2023)
- California Native Plant Society Rare Plant Inventory (CNPS 2023a)
- Consortium of California Herbaria 2 (CCH2 2023)
- USFWS Information Planning and Consultation database (USFWS 2023b)
- eBird Online Database (eBird 2023)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2023b)
- California Natural Community List (CDFW 2022)

On April 6, 2023, WRA conducted a field assessment of the Study Area to observe conditions for the presence of sensitive land cover types and the potential to support habitat for special status plant and wildlife species. Potentially jurisdictional areas and sensitive habitats were mapped using a combination of mapping-grade GPS devices and hand-drawn boundaries on high-resolution aerial imagery.

5.0 RESULTS

5.1 Vegetation Communities and Other Land Cover

WRA observed three land cover types within the Study Area: developed, ruderal, and eucalyptus stands. All are non-sensitive. Land cover types within the Study Area are depicted in Attachment A.

Developed

Developed areas comprise the vast majority of the Study Area and consist of buildings, paved and concrete areas, landscaped areas, unvegetated debris piles, and bare dirt and gravel areas typical of developed industrial and residential land uses.



Typical view of developed area in the Main Parcel.



Typical view of developed area in the residential area between the Cow Palace property and the PG&E Martin Substation

Ruderal

Small portions of the Study Area have been historically disturbed, but modern disturbance is infrequent enough that they have become vegetated by a mix of non-native species typical of ruderal conditions. Ruderal areas were mapped along the eastern boundary of the Main Parcel, the southern boundary of the driveway to the Main Parcel, and along a narrow, steep slope along the eastern boundary of the Cow Palace property. On the Main Parcel, the ruderal area includes rock and debris piles that are now vegetated. Ruderal areas are typically dominated by herbaceous species, but along the Main Parcel driveway, it is comprised of dense, non-native shrubs. Common herbs in ruderal areas include, but are not limited to, Cretan mallow (*Malva multiflora*), riggut brome (*Bromus diandrus*), Italian thistle (*Carduus pycnocephalus*), fennel (*Foeniculum vulgare*), Bermuda buttercup (*Oxalis pes-caprae*), rattail fescue (*Festuca myuros*), bird's-foot trefoil (*Lotus corniculatus*), fumitory (*Fumaria* sp.), purple pampas grass (*Cortaderia jubata*), and Harding grass (*Phalaris aquatica*). Along the Main Parcel driveway, the vegetation is dominated by cotoneaster (*Cotoneaster* sp.), French broom (*Genista monspessulana*), and gorse (*Ulex europaeus*). Occasional coyote brush (*Baccharis pilularis*) individuals are present at low cover in some ruderal areas.



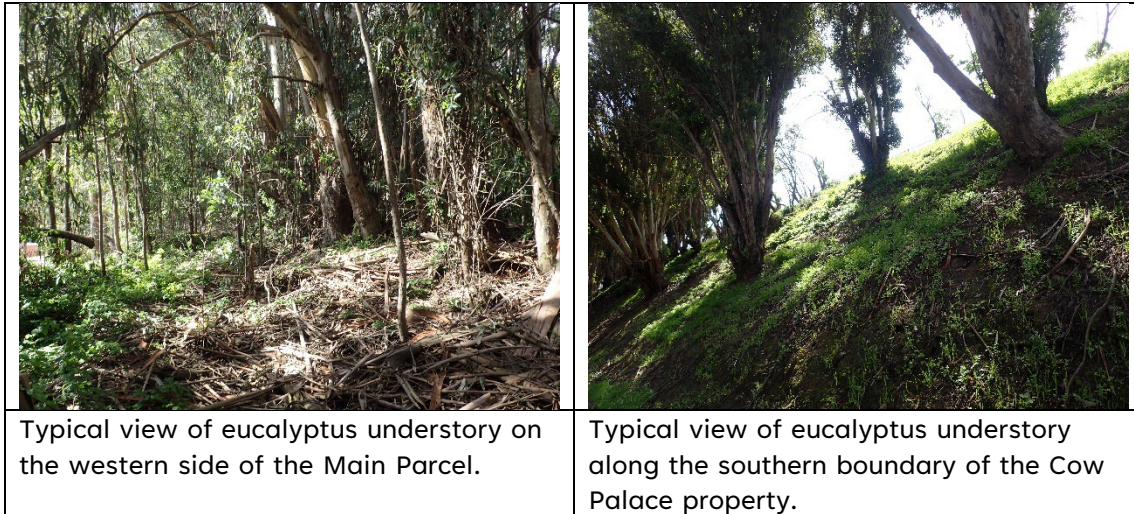
Ruderal area in the southeast portion of the Main Parcel.



Ruderal area along the eastern boundary of the Cow Palace property.

Eucalyptus Stands

Eucalyptus stands are located along the boundaries of the Main Parcel and the Cow Palace property. They consist primarily of historically planted trees that have also naturalized to a limited extent. They occur on flat areas and steep slopes. The understory varies from dense vegetative litter to sparsely vegetated areas with abundant bare ground to dense herbaceous vegetation. The overstory is comprised of blue gum eucalyptus (*Eucalyptus globulus*), with occasional Monterey pine (*Pinus radiata*). Common understory species include, but are not limited to, poison oak (*Toxicodendron diversilobum*), fumitory, veldtgrass (*Ehrharta erecta*), miner’s lettuce (*Claytonia perfoliata*), cleavers (*Galium aparine*), Bermuda buttercup, ripgut brome, and Italian thistle.



5.2 Special-status Species

5.2.1 Special-status Plant Species

Based upon a review of the resource databases listed in Section 3.0, 66 special-status plant species have been documented in the vicinity of the Study Area. All are unlikely or have no potential to occur within the Study Area because suitable conditions are lacking (e.g., edaphic [soil] conditions, topography, unique pH, associated natural communities, low levels of disturbance). Additionally, no special-status plant species were observed within the Study Area on April 6, 2023.

5.2.2 Special-status Wildlife Species

Based upon a review of the resource databases listed in Section 3.0, 32 special-status wildlife species have been documented in the vicinity of the Study Area. Of these species, most are excluded based on a lack of habitat features (e.g., tidal marsh, old growth redwood or fir forest, grassland, sandy beaches or alkaline flats, and the presence of specific host plants). Additional species are excluded due to the lack of hydrological connection with streams that could support breeding populations of amphibians, and absence of quality foraging habitat within the Study Area. As such, most special-status wildlife species documented from the vicinity have the

potential to occur within the Study Area. Special status and non-status bird species protected by the Migratory Bird Treaty Act (MBTA) as well as by California Fish and Game Codes (CFGC) have potential to nest in vegetation or on structures within or adjacent to the Study Area. Additionally, while no structures suitable for bats are present in the Study Area, special status and non-special status bat species have the potential to be present in eucalyptus trees present at the margins of the Study Area.

6.0 ANALYTICAL METHODOLOGY AND SIGNIFICANCE THRESHOLD CRITERIA

Pursuant to Appendix G, Section IV of the State CEQA Guidelines, a project would have a significant impact on biological resources if it would:

- a) 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;
- b) 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 U.S. Fish and Wildlife Service;
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- d) 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;
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or,
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

These thresholds were utilized in completing the analysis of potential project impacts for CEQA purposes. For the purposes of this analysis, a “substantial adverse effect” is generally interpreted to mean that a potential impact could directly or indirectly affect the resiliency or presence of a local biological community or species population. Potential impacts to natural processes that support biological communities and special-status species populations that can produce similar effects are also considered potentially significant. Impacts to individuals of a species or small areas of existing biological communities may be considered less than significant if those impacts are speculative, beneficial, de minimis, and/or would not affect the resiliency of a local population.

7.0 IMPACTS AND MITIGATION

The purpose of this impact assessment is to evaluate the potential impacts of Project construction and operation on existing conditions for biological resources based on the significance thresholds and methodology discussed above in Section 6.0. This section is structured to specifically address each significance threshold for biological resources from CEQA Appendix G. Each section addresses a specific question posed by Appendix G.

Specific impacts and a discussion of avoidance, minimization and mitigation are discussed below. For each subsection, potential significant impacts are first identified and discussed. Then, the approach for mitigation to compensate for those impacts is discussed. Finally, a significance conclusion is provided for each potential impact. A summary of Impacts and Mitigation is presented in Table 1 below.

Table 1: Summary of Impacts and Mitigation

CEQA ASSESSMENT CATEGORY IV.-BIOLOGICAL RESOURCES	BIOLOGICAL RESOURCES CONSIDERED	POTENTIALLY SIGNIFICANT IMPACT	SUMMARY OF MITIGATION MEASURES
Question A. Special-status species	Special-status Plants Special-status Wildlife Designated Critical Habitat	<p>Direct impacts or indirect disturbance to native nesting birds protected by the CFGC by destroying active nests or causing disturbance that results in nest abandonment.</p> <p>Direct impacts or indirect disturbance to special-status and non-status roosting bats by destroying active roosts or causing disturbance that results in roost abandonment.</p>	<p>If construction activities cannot be avoided during nesting (February 1-August 31) or bat maternity season (April-October):</p> <p>Pre-construction bird surveys within 500 feet of construction area within 4 days of initial ground disturbance or vegetation removal.</p> <p>If nests of protected avian species are present, no-work exclusion zones around any active protected nest until all young have fledged or are independent of nest.</p> <p>Pre-construction bat surveys within 14-30 days of initial ground disturbance or veg removal. Regardless of timing of tree removal or trimming, allow all felled trees and large limbs to remain on the ground for at least 24 hours.</p>
Question B. Sensitive natural communities & riparian habitat	Sensitive Natural Communities Streams, Lakes, & Riparian Habitat	No impact, no sensitive natural communities on-site	Not applicable
Question C. State and federally protected wetlands	Wetlands Unvegetated surface waters	No impact, no wetlands or other waters on-site	Not applicable

CEQA ASSESSMENT CATEGORY IV.-BIOLOGICAL RESOURCES	BIOLOGICAL RESOURCES CONSIDERED	POTENTIALLY SIGNIFICANT IMPACT	SUMMARY OF MITIGATION MEASURES
Question D. Fish & wildlife corridors	Essential Fish Habitat Wildlife Corridors	No impact, no EFH or wildlife corridors present in the Study Area	Not applicable.
Question E. Local policies	Protected Trees Other biological protections	No impact because the Project will obtain a use and grading permit as well as a tree removal permit from the City of Daly City.	Not applicable.
Question F. Local, state, federal conservation plans	Habitat Conservation Plans	No impact, the portion of the Study Area within the San Bruno Mountain Habitat Conservation Plan is located within the PG&E Martin Substation and is fully developed for industrial uses.	Not applicable.

7.1 Impacts and Mitigation Evaluation for Special-status Species

This section analyzes the Project’s potential impacts and mitigation for special-status species in reference to the significance threshold outlined in CEQA Appendix G, Part IV (a):

- a) *Does the project have the potential to 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?*

Potential impacts and mitigation for potentially significant impacts to special-status species are discussed below.

7.1.1 Special-status Plant Species

A total of 66 special-status plant species have been documented within the vicinity of the Study Area. Of these species, all are unlikely or have no potential to occur within the Study Area. Additionally, no special-status plant species were observed within the Study Area on April 6, 2023. As such, impacts to special-status plant species would be less than significant under CEQA.

7.1.2 Special-status Wildlife Species

A total of 32 special-status wildlife species have been documented from the vicinity of the Study Area. Of these species, none were determined to have moderate or high potential to occur within the Study Area. Nesting birds protected by the MBTA have potential to nest within the eucalyptus trees and various shrubs within and adjacent to the Study Area. Special-status and

non-status bats have potential to roost in within the eucalyptus trees along the perimeter of the Study Area. The following sections present recommendations for future studies and/or measures to avoid or reduce impacts to these species.

Special-status and Other Birds

Special-status and non-status nesting birds protected under the CFGC have the potential to nest in trees, shrubs, herbaceous vegetation, and on bare ground and man-made structures within and adjacent to the Study Area. Project construction activities have the potential to impact nests in these areas if construction is initiated during the breeding bird season (February 1 through August 31). Potential impacts include direct destruction of nests as well as indirect visual and acoustic disturbance to nesting birds from construction in adjacent areas that has the potential to result in nest abandonment. Destruction of nests or indirect disturbance from construction that results in nest abandonment are considered **potentially significant impacts** under CEQA. The project would also result in the loss of a small amount of suitable nesting habitat. Based on extensive development within and adjacent to the Study Area, the area of lost potential nesting habitat is considered a less than significant impact.

Potential Impact BIO-1: Project construction activities have the potential to result in direct impacts or indirect disturbance to special-status nesting birds and other native nesting birds protected by the CFGC. Construction could directly destroy active nests or cause disturbance that results in nest abandonment.

To reduce potential impacts to nesting birds to a **less-than-significant** level, the following measures shall be implemented:

Mitigation Measure BIO-1: Initiation of construction activities during the avian nesting season (February 1 through August 31) will be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction nesting bird surveys will be conducted within 14 days of initial ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys can be used to detect the nests of special-status as well as non-special-status birds. Surveys will encompass the entire construction area and the surrounding 500 feet. An exclusion zone where no construction would be allowed will be established around any active nests of any protected avian species found in the Study Area until a qualified biologist has determined that all young have fledged and are independent of the nest. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and will be at the discretion of the biologist and, if necessary, the California Department of Fish and Wildlife. These surveys would remain valid as long as construction activity is consistently occurring in a given area and will be completed again if there is a lapse in construction activities of more than 14 consecutive days during the breeding bird season.

Special-status and non-status bat species

Special-status and non-status bat species have the potential to be present in eucalyptus trees present at the margins of the Study Area. Project construction activities have the potential to impact nests in these areas if construction is initiated during the bat maternity season (generally

April through October). Potential impacts include direct destruction of roosts as well as indirect visual and acoustic disturbance to roosting bats from construction in adjacent areas. Destruction of roosts or indirect disturbance from construction that results in roost abandonment are considered **potentially significant impacts** under CEQA. The project would also result in the loss of a small amount of suitable roosting habitat. Based on extensive development within and adjacent to the Study Area, the area of lost potential roosting habitat is considered a less than significant impact.

Potential Impact BIO-2: Project construction activities have the potential to result in direct impacts or indirect disturbance to special-status and non-status roosting bats. Construction could directly destroy active roosts or cause disturbance that results in roost abandonment.

To reduce potential impacts to roosting bats to a **less-than-significant** level, the following measures shall be implemented:

Mitigation Measure BIO-2: Initiation of construction activities during the bat maternity season (generally April through October) will be avoided to the extent feasible, any tree removal or trimming should be conducted outside of the bat maternity season (generally April through October). If this work window is not feasible, pre-construction bat roost assessments conducted by a qualified biologist at least 14 days and no more than 30 days prior to removal are recommended to determine if bats roosts are present that may be impacted by Project activities. If special-status bat species or maternity roosts are detected during these surveys, additional measures including avoidance of the roost sites until the end of the maternity roosting season may be recommended.

Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs should remain on the ground for at least 24-hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition.

7.1.3 Sensitive Natural Communities Impacts and Mitigation Evaluation

This section addresses the question outlined in CEQA Appendix G, Part IV (b):

- a) *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 U.S. Fish and Wildlife Service;*

There is no riparian habitat or any sensitive natural community within the Study Area. There will be **no impact** to riparian habitats or other sensitive natural communities.

7.1.4 Impacts and Mitigation Evaluation for Wetlands and Other Areas Regulated by Section 404 of the Clean Water Act

This section analyzes the Project's potential impacts and mitigation for wetlands and other areas presumed or determined to be within the jurisdiction of the U.S. Army Corps of Engineers in reference to the significance threshold outlined in CEQA Appendix G, Part IV (c):

- a) *Does the Project have the potential to have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

The Study Area does not contain any wetlands or areas under the jurisdiction of the U.S. Army Corps of Engineers or Regional Water Quality Control Board. There will be **no impact**.

7.1.5 Impacts and Mitigation Evaluation for Habitat Corridors and Linkages

This section analyzes the Project's potential impacts and mitigation for habitat corridors and linkages in reference to the significance threshold outlined in CEQA Appendix G, Part IV (d):

- a) *Does the Project have the potential to 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;*

Movement and migratory corridors are segments of land that provide a link between core habitat areas (Beier 1992, Soule and Terborgh 1999). The majority of the Study Area is developed or previously disturbed and is within a densely developed urban area. While some open space is present nearby, the site does not contain sufficient natural features to function as a wildlife movement corridor. There is **no impact** to movement or migratory corridors resulting from the Project because no movement or migratory corridors are present on the site.

7.1.6 Impacts and Mitigation Evaluation for Local Policies and Ordinances

This section analyzes the Project's potential impacts and mitigation based on conflicts with local policies and ordinances in reference to the significance threshold outlined in CEQA Appendix G, Part IV (e):

- e) *Does the Project have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;*

The Project may impact trees located in publicly owned areas. A tree removal permit will be obtained from the City of Daly City prior to the removal of such trees, in compliance with City code 12.40. Therefore, the project will not conflict with this requirement of City code.

There is no impact of the Project resulting from potential conflict with local codes and ordinances protecting biological resources.

7.1.7 Habitat Conservation Plans

This section analyzes the Project's potential impacts and mitigation based on conflicts with any adopted local, regional, and state habitat conservation plans in reference to the significance threshold outlined in CEQA Appendix G, Part IV (f):

f) Does the Project have the potential to 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 far eastern portion of the Study Area's transmission line is located within the PG&E Martin Substation, which is located within the San Bruno Mountain Habitat Conservation Plan area. However, this portion of the Study Area is entirely surrounded by fully developed industrial uses and would not impact special-status species habitat or other sensitive habitats. The transmission line would also not involve a change in use type of the existing PG&E Martin Substation. Therefore, the Project would not conflict with the San Bruno Mountain Habitat Conservation Plan.

8.0 REFERENCES

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Thomson, R.C., A.N. Wright, and H.B. Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. Co-published by the California Department of Fish and Wildlife and University of California Press. Oakland, California.

[USGS] United States Geological Survey. 2021a. Hunters Point 7.5-minute Quadrangle map.

[USGS] United States Geological Survey. 2021b. San Francisco North 7.5-minute Quadrangle map.

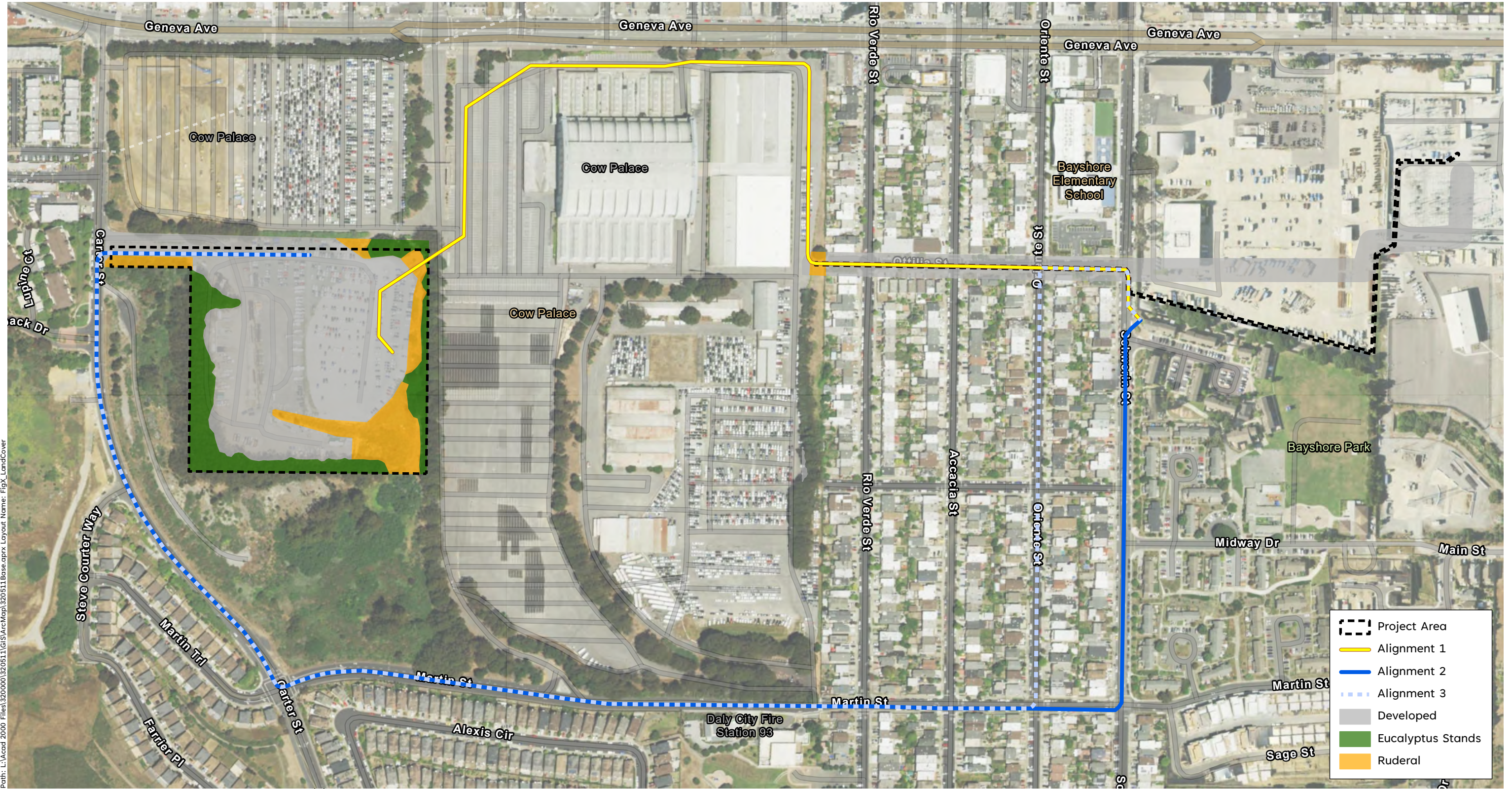
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Attachment A. Land Cover Types



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Sources: USDA NAIP Imagery 2020, WRA | Prepared By: rochelle, 9/6/2024

Attachment A. Land Cover Types

