



BLACK MOUNTAIN CONSERVATION BANK

SAN BERNARDINO COUNTY, CALIFORNIA

INTERIM MANAGEMENT & IMPLEMENTATION PLAN



Prepared for:
CDFW Central Region
CDFW Inland Deserts Region

Prepared by:
Wildlands
3301 Industrial Avenue
Rocklin, CA 95765
Contact: Cindy Tambini
Email: ctambini@wildlandsinc.com
Tel: (916) 435-3555

February 2018

TABLE OF CONTENTS

Section I. Introduction 1
 A. Phases 1
 B. Biological Surveys 1
 C. Purpose of Plan 3
 Section II. Startup Activities 4
 A. Baseline Biological Surveys 4
 A.1. 10-Meter Transects 4
 A.2. Camera Trapping 4
 B. Rehabilitation Elements 6
 B.1. Trail Rehabilitation 6
 B.2. Trash Removal 6
 C. Security Infrastructure Elements 7
 C.1. Property Corners and Boundaries 7
 C.2. Fencing 7
 C.3. Signage 7
 D. Construction Security 7
 Section III. Startup Tasks by Phase 9
 A. Phase I 9
 B. Phase II 10
 C. Phase III 11
 Section IV. Interim Management and Monitoring 12
 A. Biological Elements 12
 B. Security Infrastructure Elements 13
 C. Administrative Elements 13
 D. Adaptive Management 14
 Section V. Financial Assurances 15

LIST OF FIGURES

Figure 1. General Location
 Figure 2. Topographic Map
 Figure 3. Vegetation Alliances
 Figure 4. Conceptual Overview and Cross Section of Trail Rehabilitation
 Figure 5. Startup Activities
 Figure 5.1 – 5.2. Trash Remediation Photos

LIST OF TABLES

Table 1. Property Details 1
 Table 2. Vegetation Alliances 2

Section I. Introduction

A. Phases

The Black Mountain Conservation Bank (“BMCB” or “Bank”) is being established to satisfy compensatory mitigation requirements for projects taking place within the approved Service Area (**Exhibit C to the Conservation Bank Enabling Instrument or CBEI**) for adverse impacts to Covered Species, Covered Habitat, and Stream Habitat. The Bank is being established in three phases as provided in Table 1 below. While all three phases are described in this Interim Management Plan (Management Plan) the activities described herein shall apply only to the phase or phases that have been “Established” consistent with Section V of the CBEI. Throughout this document, individual parcels will be referenced as Phase I, II or III as designated in **Table 1**. Phase I will be the first phase Established. However, the order of Establishment for the other phases is undetermined.

Covered Species have been documented on each of the three phases of the Bank provide a total of 1,940.08 acres of high quality desert scrub habitat for the Covered Species and is located in the Mojave Desert, approximately 20 miles north-northwest of the town of Barstow in San Bernardino County (**Figure 1**). The phases consist of three parcels; Assessor Parcel Numbers (APNs) 0501-01-02, 0501-01-04, and 0501-01-06. The parcels are located in Sections 29, 31, and 33, Township 32 South, and Range 44 East of the Lockhart and Bird Spring 7.5-minute U.S. Geological Survey (USGS) quadrangles (**Figure 2**).

APN	Phase	Assessor’s Acreage	USGS Quad	Meridian	Township	Range	Section
0501-011-02	I	640.00	Bird Spring (35117B3) & Lockhart (35117A3)	Mt Diablo	32S	44E	29
0501-011-06	II	660.08	Lockhart (35117A3)	Mt Diablo	32S	44E	31
0501-011-04	III	640.00	Lockhart (35117A3)	Mt Diablo	32S	44E	33
Total		1,940.08					

This Interim Management and Implementation Plan (“(Interim Plan”) has been developed to provide details regarding certain “Startup Activities” as well as management and monitoring activities described herein shall only be required for any phase or phases that have been “Established” consistent with Section V of the CBEI.

B. Biological Surveys

Biological surveys have been completed on all Phases of the Bank to varying degrees including 50-meter transects on all Phases (Corvus, 2015). More recently 10-meter transects following the U.S. Fish and Wildlife Service survey protocol for Agassiz desert tortoise were completed on Phase I, with

presence/absence surveys conducted in areas thought to have greater potential for presence on Phases II and III (Corvus, 2017). Mohave ground squirrel and live Agassiz desert tortoise and its sign have been documented on all three phases of the Bank. Most recently a desert tortoise was documented on Phase II of the Bank through the use of a trail camera set up near an active burrow.

The following biological surveys were conducted by or on behalf of Wildlands at the Bank Property:

- June 11-14, 2012 (Wildlands - Jacob Robinson) – desert tortoise and other covered species sign and habitat
- October 19, 2014 (Wildlands - Ryan Lopez) – desert tortoise and other covered species sign and habitat
- March and May, 2015 (Philip Leitner and David Delaney) – Mohave ground squirrel camera trapping
- May 15-19, 2015 (Corvus Ecological Consulting) – desert tortoise and other covered species sign and habitat, 50-meter transects across all parcels
- May 6 – May 20, 2016 (Ironwood Consulting) – desert tortoise sign and habitat, 30-meter transects for portions of one parcel, high-grade transects elsewhere.
- April 1 – April 19, 2017 (Corvus Ecological) – 10-meter transects on Phase I.
- April 15, 2017 (Corvus Ecological) – desert tortoise and other covered species sign and habitat.
- On-going - wildlife cameras to detect multiple covered species

Collectively these surveys will be referenced throughout this document as the **Wildlands’ Surveys**. Reports prepared by Corvus Ecological Consulting (2017), Corvus Ecological Consulting (2015), Ironwood Consulting, and Leitner and Delaney with the results of their surveys can be found in **Exhibit H of the CBEI**. A summary of vegetation and habitats found on the Bank Property can be found in **Figure 3** and Table 2 below:

Table 2. Vegetation Alliances					
APN	Phase	Vegetation Alliance	Upland Acres	Stream Acres	Total
0501-011-02	I	<i>Larrea tridentata – Ambrosia dumosa</i>	578.198	61.802	640.00
0501-011-06	II	<i>Larrea tridentata – Ambrosia dumosa</i>	331.071	29.468	660.08
		<i>Atriplex polycarpa</i>	272.635	26.906	
0501-011-04	III	<i>Larrea tridentata – Ambrosia dumosa</i>	620.595	19.405	640.00
Total			1,940.08		

A baseline 10-meter transect survey and Mohave ground squirrel (MGS) camera trapping shall take place within the first year of Establishment for each Phase if not already completed prior to Establishment. These surveys, along with other survey data contained in the Wildlands’ Surveys will serve as the baseline condition for tracking changes on the Bank over time.

C. Purpose of Plan

This Interim Management and Implementation Plan has been developed to provide details regarding certain “Startup Activities” as well as management and monitoring activities that will take place during Years 1 – 3. If not completed prior to Establishment, Startup Activities include such things as:

- 1) Conducting a baseline biological assessment within one year of Establishment;
- 2) Installation of initial fencing;
- 3) Conducting trash/litter removal;
- 4) Conducting trail rehabilitation as applicable; and
- 5) Installing signage.

Section II. Startup Activities

To the extent they were not completed prior to Establishment of a particular Phase, “Startup Activities” will be completed within Year 1 of Establishment for each Phase. Startup Activities include baseline biological surveys, rehabilitation efforts (e.g., trail rehabilitation, trash removal) and installation of fencing and signage. Because Startup Activities are one-time events that are not ongoing throughout the Interim Management Period, they will be secured through a “Construction Security” for each Phase. A cost analysis of the Construction Securities is provided as **Exhibit C-2 of the CBEI** and is described in Section D below.

A. Baseline Biological Surveys

Objective: Establish baseline conditions to provide a framework for managing the Bank.

A baseline 10-meter transect survey and Mohave ground squirrel (MGS) camera trapping shall take place within the first year of Establishment for each Phase if not already completed prior to Establishment. These surveys, along with other survey data contained in the Wildlands’ Surveys will serve as the baseline condition for tracking changes on the Bank over time.

A.1. 10-Meter Transects

A qualified biologist will conduct baseline 10-meter transect survey in the spring during Year 1 for each Phase unless completed prior to Establishment. During the survey, biologists will map locations of live ADT, ADT sign, and note other Covered Species or their sign observed. Biologists will also map:

- Location and extent of non-native plant species of concern,
- Incidence of trespass
- Locations of large trash items.

Specific locations of small trash items (i.e. balloons, aluminum cans, etc...) will not be documented. Small trash items found will be picked up and removed during the survey.

The 10-meter transect baseline surveys have been completed for Phase I and are included in Exhibit H to the CBEI.

A.2. Camera Trapping

Remotely triggered cameras will be installed to monitor use of the Bank by MGS and other Covered Species in Year 1. Camera installation and the first survey event will be done in coordination with the spring 10-meter transect survey for ADT.

- Conduct two camera-trapping events between March 15 and May 15 to document MGS presence. Camera placement and the first event will be done, in coordination with the spring 10-meter transect survey.
 - Camera specifications:
 - At least 1 photo per second when triggered
 - Trigger speed of <0.5 seconds
 - Recovery speed of ≤1 second
 - Minimum 60 Mb/s download speed on SD card
 - Camera trap setup
 - 24-hour camera operation

- Face camera north
- Keep shrubs and other potential wind-triggers out of field of view (if feasible)
- Place bait approx. 4-5 ft from camera
- Place bait in center of field of view
- Test camera trigger at bait location before leaving
- Bait must be present every day
- Baiting Method (one of the following will be used)
 - Manual placement of small bait piles each day
 - PVC tubes filled with bait
 - Bait blocks
- 1 camera per 25 acres
- Minimum two 5 full-day sessions with three weeks between

Bait will be placed between 4 and 5 feet in front of each camera. Surveys may cease earlier at individual camera location once MGS are detected at a particular camera location if a qualified biologist has determined that bait stations are attracting and subsidizing ravens. If alternative baiting methodologies are developed adaptive management will be implemented to assess benefits and consider implementation, in coordination with and written approval by CDFW.

B. Rehabilitation Elements

Objective: Remove Trash and rehabilitate trails to provide suitable habitat to support functioning populations of ADT and MGS.

B.1. Trail Rehabilitation

Opportunities for habitat enhancement and rehabilitation are available on the Bank Property with well-defined OHV trails and camping areas that will be closed to public access, and trash and debris. The addition of fencing and/or no trespassing signage, trash cleanup, and the rehabilitation of OHV trails and camping sites are the main actions proposed. A plan for each phase is provided in Section III below.

NOTE: Not all OHV trails identified on the Bank Property warrant active rehabilitation. OHV trails that are being proposed for rehabilitation and enhancement are those with recent and heavy use, are in close proximity to main roads or areas of high anthropogenic impacts, and those that would greatly benefit from active enhancement (**Figure 5**).

OHV trail rehabilitation will focus on reducing the trail's visibility and ease of use, thereby discouraging future trespass and use, increasing habitat value, restoring natural hydrology, and encouraging natural revegetation. Rehabilitation of OHV trails includes the following specific strategies: sweeping and raking, pitting, vertical mulching, and re-contouring. A description of each of these strategies is provided below and a conceptual overview and cross-section of typical trail rehabilitation area is provided as **Figure 4**.

1. **Sweeping and raking** will smooth tire ruts, re-distribute materials such as rocks, sand, and plant material, thereby making tracks less visible, encouraging revegetation, and improving local hydrology. Sweeping and raking will be done by hand with brooms, fine tined rakes, or flat rakes, or by a drag pulled behind a small 4-wheeled vehicle.
2. **Pitting** is a desert restoration technique that creates subtle depressions to increase the collection of organic material, seed and water, thereby increasing germination and growth success. Pits are usually only six to eight inches deep and three to six feet wide with shallow sloped sides. Pitting can be done by hand with shovels and rakes.
3. **Vertical mulching** is "planting" of dead or live plant material (mulch) in the ground. This can consist of shrub branches or grass clumps 'planted' individually or in bunches. Vertical mulching can improve the capture of moisture and wind-blown seeds increasing germination of native plants. The mulch also provides camouflage of previously disturbed areas if installed in irregular patterns matching the shrub growth patterns and distances of the surrounding habitat. Material for mulching will be collected locally when appropriate, or secured from nearby sites undergoing land clearing for other permitted purposes.
4. **Native rocks** from the immediate area may be moved into the impacted track area to create habitat, camouflage, and discourage future use within the track. Rocks will only be placed if they do not impact hydrology.

B.2. Trash Removal

Small trash items/litter will be removed when observed during annual Site Condition Surveys. Specific locations of these items will not be documented or reported. Removal of larger trash items (e.g. dumping) will be completed during year 1 of the Interim Management Period. Specific cleanup activities are discussed in Section III below by property.

C. Security Infrastructure Elements

Objective: Prevent unauthorized use of the Bank.

C.1. Property Corners and Boundaries

Boundaries of the Bank Properties will be marked in the field prior to fencing and signage installation. Property corners will be set using San Bernardino County GIS coordinates by a licensed surveyor. Corners will be marked with a t-post for location by fencing contractor. Geographic Information Systems (GIS) data will be made available upon request.

C.2. Fencing

Fencing will be installed to discourage trespass on all phases of the Bank. A fencing plan is provided in **Figure 5**. Fencing for each Phase will be installed within one year of Establishment of the applicable Phase. Fencing will be wildlife safe and consist of 4-stranded barbless wire. The bottom wire shall be 12-14 inches off the ground to allow for wildlife movement. The spacing between the top two wires will be at least 14 inches apart. All fencing and signage shall be raptor and bird safe (capped, no open pipes, etc.). Quad use will be limited to delivering fencing materials and running wire around the site during initial installation and all future fence replacement.

Fencing will be installed as follows:

1. Mow vegetation to allow installation of a straight fence along the unfenced property line. A qualified biological monitor will walk in front of the mower to ensure that sensitive resources, including ADT and MGS and their burrows, are avoided during mowing. The mower will be lifted to avoid short shrubs that are not in the way of fence construction. A Bobcat T750 skid steer will be used to mow the fence line, carry fence materials, and drill the post holes for the corner posts and H-braces. The skid steer has an approximate 12 inch ground clearance and vegetation will be mowed to approximately 10 inches high. Once mowed, the skid steer will stay on the mowed path to the extent possible.
2. Once the corner posts and braces are set in place, set in concrete, and a cap welded on each open post, T-posts are installed using hand-carried post pounders.
3. Once all T-post are installed, the skid steer will be used to unspool wire from a wire jenny. All four strands will be unspooled at the same time minimizing the need to make multiple trips along the mowed path.. After a wire is pulled, it will be stretched to appropriate tension and the attached to each t-post using clips.
4. All equipment will remain in the mowed path to minimize disturbance during fence installation.
5. A monitoring biologist will be onsite during fence installation and vertical mulching to ensure that biological resources are avoided and protected.

C.3. Signage

Signs will be placed on the fence approximately every 500 feet. Signage will not be installed on unfenced areas (i.e. the rocky slopes). The proposed sign spacing may be altered based on the need for higher density signage in higher use areas (e.g. near existing trails). Following installation, the status of signage will be monitored annually.

D. Construction Security

The cost of the Startup Activities is the responsibility of the Bank Sponsor. Because Startup Activities are not ongoing activities that occur throughout the Interim Management Period they are secured by the Construction Security. The Construction Security shall be in the form of a Letter of Credit and shall be in an amount as provided in the Construction Security Analysis (**Exhibit C-1 to the CBEI**). The

Construction Security for each applicable phase shall be released to the Bank Sponsor after the Bank Sponsor completes the fence installation, signage, and other Startup Activities for that phase in accordance with this Plan, as demonstrated by:

- a) Bank Sponsor's written notification of completion of fence installation, signage, and other startup activities;
- b) An on-site inspection by CDFW if required; and
- c) Written approval from CDFW.

Section III. Startup Tasks by Phase

The following section describes specific tasks proposed for each Phase within Bank. Each startup task is categorized with a unique identifier to allow for quick reference later in the document and to the costs provided in the Construction Security Analysis.

A. Phase I

The Phase I Property ranges in elevation from approximately 2,250 ft. above msl on its southeasterly boundary to 2,730 ft. above msl at the top of the rocky mesa. The dominant vegetation alliance is *Larrea tridentata* – *Ambrosia dumosa*. Limited human impacts were observed within the Phase I Property (**Figures 5 & 5.1**). No grazing impacts were observed although occasional sign of wild burros was found. BLM designated routes lead to the northern and southern boundaries of the site with trails extending onto the Phase I property. Besides the OHV trails there are a few minor occurrences of trash and trespass such as: fire rings, an old tire, pile of lumber, and a shooting range with shells and clay pigeons. Startup Activities proposed to take place within the first year post Establishment for the Phase I Property include the following actions:

- Baseline Biological Assessment (SUP I.1)
- Vertical mulching on both ends of OHV trails (SUP I.2)
- Remove campfire rings, tire, shooting range (SUP I.3)
- Mark property corners and boundaries (SUP I.4)
- Install fencing and no trespassing signs (SUP I.5)

Task SUP I.1 Baseline Biological Survey: Baseline Biological Surveys consisting of 10-meter transects have already been completed for Phase I. Camera trapping for MGS will be conducted in Year 1.

Task SUP I.2 Trail Rehabilitation: Sweep, pit, and mulch approximately 200 feet into the easement area from the northern and southern boundaries. Sweeping and pitting will be done with a combination of a drag and hand tools, avoiding any plants trail side or that are growing in the centerline. Rocks may be moved from trailside into the swept trail at irregular intervals. Sweeping and mulching will not be done within wash areas crossing the trails. Mulching will be done with materials collected locally and ‘planted’ approximately 5 to 10 feet apart and from existing shrubs to match local plant densities and patterns.

Task SUP 1.3 Cleanup Activities: Campfire rings will be removed by scattering the rocks and ash (making sure the burnt material is hidden as much as possible) and sweeping/raking the area. Lumber dumped on site will be removed and taken to a landfill. If needed the area will be swept and/or raked. An old tire that appears to have been used for target practice will be removed along with visible shell casings. Visible shell casings and clay pigeon remnants from the old shooting range shall be removed (Figure 5.1 – 6.2).

Task SUP 1.4 Boundaries and Property Corners: The boundaries of the Phase I property will be marked in the field prior to fencing and signage. Property corners will be set using San Bernardino County GIS coordinates by a licensed surveyor. Corners will be marked with t-posts for ease of identification by the fencing contractor.

Task SUP 1.5 Fencing and Signage: Fencing will be installed along the perimeter of the Phase I Property with the exception of the portion of the eastern boundary where the rocky slopes occur (Figure 5). Fencing will occur within one year of Bank Establishment. Approximately 17,500 linear feet of fencing will be installed. Orange or other brightly colored and reflective signs, or signs with reflective tape, will be installed where fences cut-off existing OHV trails in order to make these new fences obvious

to illegal OHV activity. No trespassing signs shall be placed on the fence approximately every 500 feet (approximately 35 signs). Signs will not be placed in unfenced areas on rocky slopes.

B. Phase II

Phase II ranges in elevation from approximately 2,150 to 2,290 ft. above msl sloping gently from north to south. This parcel is situated on a gentle south-facing bajada composed of *Larrea tridentata* – *Ambrosia dumosa* and *Atriplex polycarpa* vegetation alliances and Braided Washlets. Historically some grazing may have occurred on Phase II but the habitat is currently intact and high quality. Evidence of wild burros was noted but grazing impacts were not observed. Limited human impacts were observed within the Phase II Property (**Figure 5**). Two OHV trails occur within the Phase II property. One extends from the western boundary northeasterly to the northern boundary; the second trail runs northeasterly from the southern boundary to the eastern boundary. The second trail exits to private property to the east for a short distance then enters the Phase I Property. Besides the OHV roads there are no documented occurrences of trash and trespass. Startup Activities proposed for the Phase II Property include the following actions:

- Baseline Biological Survey (SUP II-1)
- Remove litter/trash if needed (SUP II-2)
- Vertical mulching on both ends of OHV trails (SUP II-3)
- Mark boundaries and property corners (SUP II-4)
- Install fencing and no trespassing signs (SUP II-5)

Task SUP II-1 Baseline Biological Survey: A Baseline Biological Survey consisting of 10-meter transects and MGS camera trapping shall be completed during Year 1 of Establishment of Phase II of the Bank. The results of the baseline surveys shall be included in the Annual Report. If these surveys are completed prior to Establishment of Phase II, additional baseline surveys will not be required.

Task SUP II-2 Cleanup Activities: There are currently no documented occurrences of dumping on the Phase II Property. Should dumping occur, materials will be removed in Year 1 of the Interim Management Period. A budget of \$3,000 has been included in the Construction Security to cover cleanup activities should they become necessary for Phase II.

Task SUP II-3 Trail Rehabilitation: Sweep, pit, and mulch the sightline for both trails, approximately 200 feet into the Phase II Property (Figure 5). Sweeping and pitting will be done with a combination of a drag and hand tools, avoiding any plants trail side or that are growing in the centerline. Rocks may be moved from trailside into the swept trail at irregular intervals. Sweeping and mulching will not be done within wash areas crossing the trails. Mulching will be done with materials collected locally and ‘planted’ approximately 5 to 10 feet apart and from existing shrubs to match local plant densities and patterns. Habitat rehabilitation techniques will be employed where the OHV trails identified in Figure 5 enter and exit the property. Trail rehabilitation activities will be conducted in Year 1 of the Phase II Interim Management Period.

Task SUP II-4 Property Boundaries and Corners: The boundaries of the Phase II property will be marked in the field prior to fencing and signage. Property corners will be set using San Bernardino County GIS coordinates by a licensed surveyor. Corners will be marked with t-posts for ease of identification by the fencing contractor.

Task SUP II-5 Fencing and Signage: Fencing will be installed along the full perimeter of the Phase II Property (Figure 5). Fencing will occur within one year of Phase II Establishment. Approximately 21,424 linear feet of fencing will be installed. No trespassing signs shall be placed on the fence approximately every 500 feet (approximately 43 signs).

C. Phase III

The Phase III Property ranges in elevation from approximately 2,160 ft. above msl in its southwesterly corner to 2,500 ft. above msl in the north. This parcel has steep, rocky slopes on the north side with the dominant vegetation alliance is *Larrea tridentata* – *Ambrosia dumosa*. Phase III, like Phases I and II contains intact habitat with little evidence of trespass or habitat degradation. A single OHV trail/road borders the eastern boundary of the Phase III Property veering in and cutting across the northeasterly corner. Startup Activities proposed for the Phase III Property include the following actions:

- Baseline biological surveys (SUP III-1)
- Remove litter/trash if needed (SUP III-2)
- Mark property corners & boundaries to be fenced (SUP III-3)
- Install fencing and signage (SUP III-4)

Task BASE III-1 Baseline Biological Survey: A Baseline Biological Survey consisting of 10-meter transects and MGS camera trapping shall be completed during Year 1 of Establishment of Phase III of the Bank. The results of the baseline surveys shall be included in the Annual Report. If these surveys are completed prior to Establishment of Phase III, additional baseline surveys will not be required.

Task SUP III-2 Cleanup Activities: There are only minor occurrences of dumping on the Phase III Property (Figures –5 & 5.2) which include some wire and old cans. These items shall be removed and should any additional dumping occur, materials will be removed in Year 1 of the Interim Management Period. A budget of \$3,000 has been included in the Construction Security to cover cleanup activities for Phase III.

Task SUP III-3 Property Corners: The boundaries of the Phase III property will be marked in the field prior to fencing and signage. Property corners will be set using San Bernardino County GIS coordinates by a licensed surveyor. Corners will be marked with t-posts for ease of identification by the fencing contractor.

Task SUP III-4 Fencing and Signage: Fencing will be installed along the perimeter of the Phase III Property with the exception of the portion of the northern boundary where the rocky slopes occur (Figure 5). Fencing will occur within one year of Phase III Establishment. Approximately 18,200 linear feet of fencing will be installed. No trespassing signs shall be placed on the fence approximately every 500 feet (approximately 37 signs). Signs will not be placed in unfenced areas on rocky slopes.

Section IV. Interim Management and Monitoring

Pursuant to the CBEI the Interim Management Period shall end three years after full funding of the Endowment Fund. Until such time as the Endowment Fund has been fully funded for three years Bank Sponsor shall be responsible for funding all management and monitoring activities. Monitoring and maintenance activities described below in this Plan shall take place in Years 1 – 3 for each Phase of the Bank. Beginning in Year 4, management and monitoring tasks shall be consistent with those described in the Long-term Management Plan (Exhibit D-5 to the CBEI), but will continue to be funded by Bank Sponsor until such time as the Endowment Fund has been fully funded for three years.

Interim Management (Years 1 – 3) objectives and management tasks are categorized and described below for all phases as Biological Elements, Security and Infrastructure Elements, and Administrative Elements. All objectives and elements are applicable only to the Established Phases of the Bank. Each objective and management task is categorized with a unique identifier to allow for quick reference later in the document and to the interim management costs provided in Exhibit D-1 of the CBEI.

A. Biological Elements

Objective IM-1: Biological Surveys.

Task IM-1.1 Site Condition and Biological Surveys: Baseline surveys are included in the Startup tasks as provided in Section III above. For those years during the Interim Management Period when 10-meter transect baseline surveys are not scheduled, visual surveys to detect Covered Species, characterize general habitat conditions, and estimate absolute cover of Invasive Plant Species shall be conducted. Invasive Plant Species are defined as those species included in the California Department of Food and Agriculture (CDFA) list of "noxious weeds" that are subject to regulation or quarantine by county agricultural departments, the CDFA's Integrated Pest Control Branch, and the University of California State Integrated Pest Management Program list of "Exotic and invasive pests and diseases that threaten California's agricultural, urban, or natural areas".

Visual surveys will also be used to note instances of trespass, vandalism, and/or trash dumping. Surveys will be conducted in spring between mid-March and mid-May or in the fall between September and November.

- During the Interim Management Period in any year when 10-meter transects are not occurring a qualified biologist will conduct a site survey in the spring or fall. Biologists will conduct a walking survey that ensures complete visual coverage of the Bank and fencing condition to assess needs for maintenance. Biologists will note:
 - Location and extent of non-native plant species of concern,
 - Incidence of trespass including fence cutting and vandalism of signage. Biologists will repair simple cut fence lines or replace a sign or two, as feasible.

Locations of large trash items. The location of small trash items will not be specifically documented. Small trash items found will be picked up during the survey.

Task IM-1.2 Photo-documentation: Take photographs once a year at established photo points to document site conditions and allow for potential comparison in the future. A total of 6 photo point locations for each Phase will be established during the Year 1 surveys for each Phase. At each location, a

photo will be taken in each cardinal direction, so a total of 24 photographs per Phase will be taken each year. Additional photos may be taken at the biologist's discretion. A map and the coordinates for the photo point locations and corresponding photos will be provided in the Annual Report.

Task IM-1.3 Invasive Cover: A visual estimate of overall absolute cover of Invasive Plant Species will be completed annually and included in the Annual Report. As needed, control of Invasive Plant Species using appropriate manual, mechanical, and/or chemical methods will be conducted (see Task IM2.1).

Task IM-1.4 Coordination: Based on surveys, biologists will identify any necessary management and maintenance tasks for the Land Manager to conduct. The Land Manager and monitoring biologists will coordinate for cleanup and other maintenance tasks needed during the Interim Management Period. Maintenance activities are identified and described below under Objectives for IM-2 and under Security Infrastructure Elements.

Objective IM-2: Manage and maintain the Bank to provide suitable habitat to support functioning populations of Covered Species.

Task IM-2.1 Invasive Control: As needed, control of Invasive Plant Species using appropriate manual, mechanical, and/or chemical methods will be conducted. Invasive Plant Species control areas and control methods will be reported in the annual report.

- The following prescription will be used to determine when to implement treatment:
 - if there is 5% absolute cover or greater of Invasive Plant Species on the Bank,
 - if the specific remediation will remove the threat for a reasonable period of time, and;
 - if control techniques do not harm habitat quality or cause injury to sensitive areas.

Task IM -2.2 Trash Removal: As needed, remove illegally dumped debris and refuse.

Maintenance staff will remove trash items requiring cleanup, as identified during biological surveys or as discovered during annual site surveys. Maintenance staff will remove trash identified during annual biological and site condition surveys within a year of identification. Small items of trash will be removed as discovered during surveys or site visits. Trespass and illegal recreational use of the Bank habitat will be prevented and managed through Security Infrastructure Elements, as described below.

B. Security Infrastructure Elements

Objective IM-3: Prevent unauthorized use of the Bank.

Task IM-3.1: After installation during Interim Management Period, maintain signage and fencing to discourage unauthorized public use.

- Fencing that is cut will be repaired as soon after the discovery as feasible, but no less than annually and signs that have been vandalized or otherwise missing will be replaced annually. The full extent of the fence line will be inspected as part of the Site Condition and Biological Surveys annually.
- Funding has been provided to annually replace ten signs and 500 feet of fencing for Phase I and 250 feet of fencing for subsequent Phases.

C. Administrative Elements

Objective IM-4: Maintain administrative records of management and maintenance activities.

Task IM-4.1: Maintain records of management actions and associated expenditures, baseline survey data, and other biological information relevant to the Bank annually.

Task IM-4.2: Prepare and submit annual reports to CDFW by February 15th describing management activities and expenditures, survey findings, and baseline conditions. Recommendations for management/adaptive management, habitat enhancement, or other suggested modifications to the Management Plan will be included if applicable.

Annual reports will be submitted to the following addresses:

California Department of Fish and Wildlife
Inland Deserts Region
3602 Inland Empire Blvd, Suite C-220
Ontario, CA 91764
Attn: Regional Manager

California Department of Fish and Wildlife
Habitat Conservation Branch
1416 Ninth Street, 12th Floor
Sacramento, CA 95814
Attn: Branch Chief

D. Adaptive Management

Adaptive management is an approach to natural resource management that incorporates changes to management practices, including remedial actions, as determined appropriate by CDFW in collaboration with the Land Manager. Adaptive management would include incorporating new scientific information and activities necessary to address the effects of climate change, fire, flood, other natural events, force majeure, etc. While specific prescriptions for remedial measures such as clean up and trail rehabilitation are described as detailed as possible, in the field during implementation of such activities, adjustments may be necessary to accommodate changes in conditions or to improve an outcome. If a notable change is necessary, it will be described in the Annual Report. If a major change is necessary, an alternative action will be determined in coordination with CDFW.

Section V. Financial Assurances

The Bank will be annually monitored and maintained during the Interim Management Period at Bank Sponsor's expense. A Construction Security (**Exhibit C-1 to the CBEI**) for each phase shall be established to cover startup activities (i.e. baseline biological surveys, vertical mulching, fencing, signage, and clean-up). Construction Securities shall be released upon demonstration that startup activities for the applicable phase have been completed. An Interim Management Security shall be established for each Phase of the Bank (**Exhibit D-1 of the CBEI**) as a security to cover the Interim Management and monitoring costs for that Phase. The Interim Management Security shall be established concurrent with the transfer of the first Credits for the applicable Phase (**Exhibit D-1 to the CBEI**). The Interim Management Security shall be released three years after full funding of the Endowment Amount attributed to that Phase (**Exhibit D-2 to the CBEI**).

Figures