



## Limited Biological Resources Report

January 31, 2025



### **16990702 Bernal Peak**

14000 Pt Reyes Petaluma Road

Point Reyes Station, Marin County, California 94956

Trileaf # 755358

Prepared For:

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## 1. INTRODUCTION

This report contains the findings of a Biological Assessment conducted by Trileaf Corporation (Trileaf) on a proposed Verizon Wireless candidate, 16990702 Bernal Peak, in Marin County, California. The project site is generally located north of Pt. Reyes – Petaluma Road and east of Shoreline Highway, in Point Reyes Station, California and is depicted on the Inverness, California U.S. Geological Survey (USGS) 7.5-minute topographic map. The proposed project consists of the installation of a 50-foot-tall faux water tank telecommunications facility within a proposed 30-foot by 30-foot (900 square foot) lease area. A proposed 20-foot-wide access and utility easement, including a 22-foot-wide turnaround immediately north of the proposed lease area, will extend a total of approximately 200 feet south of the proposed lease area, terminating at Pt. Reyes Petaluma Road. A proposed 15-foot-wide utility easement will extend southwest from proposed lease area approximately 450 feet, where it will join the proposed access easement. A proposed 15-foot-wide utility easement will extend away from the southern portion of the access easement, approximately 50 feet, terminating at Pt. Reyes Petaluma Road.

This report serves to answer the following questions outlined in the California Environmental Quality Act (CEQA) to determine any potential significant impact the proposed project may have on biological resources.

Would the project:

1. 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 Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS)?
2. 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 CDFW or USFWS?
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
5. 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?
6. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?
7. 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 project site was surveyed on January 22, 2025, by Trileaf biologist, Ms. Samantha Neary. The biological resources within the site are described in terms of plant communities and jurisdictional drainage features. A literature review provided information regarding sensitive plant and wildlife species potentially occurring within the project site and immediate vicinity. A project description, site photographs and topographical site location maps are included in this report.

## 2. METHODOLOGY

Data regarding biological resources on the project site were obtained through a literature review that included data on biological resources in the project vicinity. The primary objective of the assessment was to document the existing conditions of the onsite biological resources.

Sensitive biological resources present, or potentially present, onsite were identified through a literature review using the following resources: the California Natural Diversity Data Base (CNDDB) and the U.S Fish and Wildlife's (USFWS) Information for Planning and Consultation (IPaC) tool, and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants. For the purpose of this report, "sensitive" or "special status" species are those plant or wildlife species that are officially listed or proposed for listing under state and/or federal endangered species acts, considered by the CDFW to be a Species of Special Concern (SSC), considered biologically rare, restricted in distribution, or declining throughout their range or within the state of California, or are associated with a habitat that is declining in California at a significant rate.

An initial review indicated that the project site is located on a grassland-covered hillside of a working cattle farm and is situated within the upper Black Mountain Creek watershed. Ms. Samantha Neary conducted the biological resources field survey to document existing conditions and to determine potential impacts to sensitive biological resources based on current site plans. The survey was conducted on foot, making note of biological resources such as plant and wildlife species. Photographs of the project area are included in Appendix B. Attention was paid to any flora or fauna in the immediate project area to determine the presence or potential occurrence of any sensitive species that may occur on the project site.

### 3. EXISTING CONDITIONS

#### 3.1 Site Description

The biological assessment survey of the project site was conducted on January 22, 2025. Weather conditions included a temperature of approximately 61 degrees Fahrenheit, winds of up to 8 miles per hour, and partly cloudy skies. The site is located generally north of Pt. Reyes – Petaluma Road and east of Shoreline Highway, in Point Reyes Station, Marin County, California 94956. Previous disturbances on the site include the development and maintenance of a working cattle farm known as Black Mountain Ranch.

The Site is currently located on a grassland-covered hillside of Black Mountain Ranch, located north of Pt. Reyes – Petaluma Road and surrounded by agricultural development. During the area reconnaissance, no trees along the access road, and generally throughout the area were identified to be removed. Photographs of the project area are included in Appendix B.

The surrounding habitat within a 0.5-mile radius of the proposed site consists predominantly of Black Mountain Ranch and additional rural and agricultural development. All of the land that resides to the north is part of Black Mountain Ranch and used for agricultural and cattle ranching purposes. To the south is Pt Reyes Petaluma Road, followed by additional farmland owned by Super Farm LLC, followed by Lagunitas Creek and forested wetland habitat. Potential habitat may be present near the proposed utility route for the following species: Showy Indian Clover, (*Trifolium amoenum*), Bluff Wallflower (*Erysimum concinnum*), Marin Checker Lily (*Fritillaria lanceolata* var. *tristulis*), Pallid Bat (*Antrozous pallidus*), and California Red-legged Frog (*Rana draytonii*). However, none of the above-listed sensitive wildlife species has a high potential to occur within the direct project footprint in which construction will take place.

California law requires every city and county in the state prepare and adopt a comprehensive long-range general plan for the physical development of the jurisdiction. Marin County has developed the Marin Countywide Plan (CWP) to provide policies for land use and development within Marin County. The proposed scope of work will not impact any of the pillars outlined in the Countywide Plan and is not expected to have any adverse impacts.

#### 3.2 Vegetation

Trees, shrubs, and grassland occur within and immediately surrounding the proposed project area. Tree species occurring near the proposed project area include Coast Live Oak (*Quercus agrifolia*), Box Elder (*Acer negundo*), Big Leaf Maple (*Acer macrophyllum*), California Buckeye (*Aesculus californica*), and Sitka Willow (*Salix sitchensis*). The land currently serves as pastureland for a working cattle ranch and is used for agricultural development. Installation of the proposed telecommunications tower and associated utility route will not result in impacts to native vegetation communities or suitable habitat for any sensitive plant species. The proposed utility route is located within Marin County. Marin County requires a tree removal permit be obtained when (exclusions apply):

- More than two (2) “Protected Trees” are being removed from a developed lot in a 12-month period;
- The tree qualifies as a “Heritage Tree”;
- The tree is a “Protected Tree” or “Heritage Tree” and is located in a Stream Conservation Area or Wetland Conservation area;
- Any removal of “Protected Trees” on a vacant lot; or,
- The trees proposed for removal do not qualify for an exemption under Section 22.62.040 of the Marin County Code.

Currently, no vegetation removal is proposed, therefore removal permits will not be required and construction activities will comply with local tree and vegetation ordinances. However, if this changes, it is likely that a tree removal permit will be required as there are currently Protected and Heritage trees located in proximity to the proposed project area.

### 3.3 Soils

According to the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey of Marin County, California, the Site is underlain by Los Osos-Bonnydoon complex, 30 to 50 percent slopes.

Los Osos soils consist of well drained soils that are formed from residuum weathered from sandstone and shale and are found in hills. The depth to the most restrictive feature is 20 to 40 inches to paralithic bedrock, and the depth to the water table is more than 80 inches. A typical profile of Los Osos soils consist of loam extending from zero (0) to 15 inches, clay extending from 15 to 30 inches, and bedrock extending from 30 to 34 inches. Los Osos soils do not have any frequency of flooding or ponding. Los Osos soils are not considered a hydric soil.

Bonnydoon soils consist of somewhat excessively drained soils that are formed from residuum weathered from shale or sandstone and are found in hills. The depth to the most restrictive feature is 10 to 20 inches to paralithic bedrock, and the depth to the water table is more than 80 inches. A typical profile of Bonnydoon soils consist of gravelly loam extending from zero (0) to 11 inches, and bedrock extending from 11 to 15 inches. Bonnydoon soils do not have any frequency of flooding or ponding. Bonnydoon soils are not considered a hydric soil.

The following minor components can be found at the site: Rock outcrop, Yorkville, Slumps, Slopes more than 50 percent, Unnamed, deep, and Tocaloma; none of which are considered hydric soils.

### 3.4 General Wildlife

The project site and surrounding area provide habitat for wildlife species that commonly occur in grassland and lightly forested communities. Species observed during the field survey include: Turkey Vulture (*Cathartes aura*), American Robin (*Turdus migratorius*), and Common Raven (*Corvus corax*).

Wildlife species expected to occur onsite include California red-legged frog (*Rana draytonii*), Bald Eagle (*Haliaeetus leucocephalus*), California black rail (*Latarallus jamaicensis coturniculus*), California Ridgeway's rail (*Rallus obsoletus obsoletus*), Burrowing owl (*Athene cunicularia*), Northern Spotted Owl (*Strix occidentalis caurina*), Western bumble bee (*Bombus occidentalis*), Northwestern pond turtle (*Actinemys marmorata*), Coastal triquetrelia (*Triquetrella californica*), Island tube lichen (*Hypogymnia schizidiata*), Sanfords arrowhead (*Sagittaria sanfordii*), Bolanders water-hemlock (*Cicuta maculata* var. *bolanderi*), Masons lilaepsis (*Lilaeopsis masonii*), Franciscan thistle (*Cirsium andrewsii*), Streamside daisy (*Erigeron biolettii*), Congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), Perennial goldfields (*Lasthenia californica* ssp. *macrantha*), Marsh microseris (*Microseris paludosa*), Coast rockcress (*Arabis blepharophylla*), Bluff wallflower (*Erysimum concinnum*), Mt. Tamalpais bristly jewelflower (*Streptanthus glandulosus* ssp. *pulchellus*), Swamp harebell (*Eastwoodiella californica*), Lyngbyes sedge (*Carex lyngbyei*), Marin manzanita (*Arctostaphylos virgata*), Coastal marsh milk-vetch (*Astragalus pycnostachyus* var. *pycnostachyus*), Harlequin lotus (*Hosackia gracillis*), Two-fork clover (*Trifolium amoenum*), North Coast phacelia (*Phacelia insularis* var. *continentis*), Marin checker lily (*Fritillaria lanceleolata* var. *tristulis*), Fragrant fritillary (*Fritillaria liliacea*), Coast lily (*Lilium maritimum*), Point Reyes checkerbloom (*Sidalcea calycosa* ssp. *rhizomata*), Pink asnd-verbena (*Abronia umbellate* var. *breviflora*), Johnny-nip (*Castilleja ambigua* var. *ambigua*), Humboldt Bay owls-clover (*Castilleja ambigua* var. *humboldtensis*), Point Reyes salty birds-beak (*Chloropyron maritimum* ssp. *palustre*), San Francisco owls-clover (*Triphysaria floribunda*), Blasdales bent grass (*Agrostis blasdalei*), Sonoma Alopecurus (*Alopecurus aequalis* var. *sonomensis*), California bottle-brush grass (*Elymus californicus*), Blue coast gilia (*Gilia capitata* ssp. *chamissonis*), Woolly-headed gilia (*Gilia capitata* ssp. *tomentosa*), Bristly leptosiphon (*Leptosiphon aureus*), Large-flowered leptosiphon (*Leptosiphon grandifloras*), Marin knotweed (*Polygonum marinense*), Water star-grass (*Heteranthera dubia*), Lobbs aquatic buttercup (*Tanunculus lobbii*), Glory brush (*Ceanothus gloriosus* var. *exaltatus*), Point Reyes ceanothus (*Ceanothus gloriosus* var. *gloriosus*), Mt. Vision ceanothus (*Ceanothus gloriosus* var. *porrectus*), Point Reyes horkelia (*Horkelia marinensis*), Western leatherwood (*Dirca occidentalis*).

### 3.5 Sensitive Biological Resources – Special Status Species

Special status species are native species that have been accorded special legal or management protection because of concern for their continued existence. There are several categories of protection at both federal and state levels, depending on the magnitude of threat to continued existence and existing knowledge of population levels.

The USFWS administers the federal Endangered Species Act (ESA). The ESA provides a process for listing species as either threatened or endangered, and methods of protecting listed species. The ESA defines as “endangered” any plant or animal species that is in danger of extinction throughout all or a significant portion of its range. A “threatened” species is a species that is likely to become endangered in the foreseeable future. A “proposed” species is one that has been officially proposed by USFWS for addition to the federal threatened and endangered species list.

Section 9 of the ESA prohibits “take” of threatened or endangered species. The term “take” means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in such conduct. Take can include disturbance to habitats used by a threatened or endangered species during any portion of its life history. The presence of any federally threatened or endangered species that is in a project area generally imposes severe constraints on development, particularly if development would result in take of the species or its habitat. Under the regulations of the ESA, the USFWS may authorize take when it is incidental to, but not the purpose of, an otherwise lawful act.

Sensitive habitats are natural communities that support concentrations of sensitive plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife. Sensitive habitats are not afforded legal protection unless they support protected species, except for wetland habitats, which cannot be filled without authorization from the U.S. Army Corps of Engineers (USACE) and CDFG.

Trileaf has researched the listed or proposed threatened or endangered species and designated critical habitat for the project area. This includes any such species that have been reported to exist within the action area where the project is located. The state list of threatened, endangered, and sensitive species was acquired from the California Natural Diversity Database (CNDDDB). The federal list of threatened and endangered species was obtained through the USFWS’s Information for Planning and Consultation (IPaC) tool. All databases were queried within 1 mile of the study area. On January 22, 2025, a Trileaf representative visited and photographed the project site, and compared the habitat at the site with that of the list of federal and state threatened, endangered, and sensitive species (photographs of the project area are included in Appendix B). The project area is not located within an aquatic environment; therefore, any obligate aquatic species should not be directly impacted by this project and are not included in the tables below.

### **Sensitive Plant Species**

Trileaf’s review of the IPaC revealed two (2) sensitive plant species. A review of the CNDDDB resulted in a list of six (6) additional sensitive plant species, for a total of eight (8) sensitive plant species potentially occurring within one mile of the project area. A list of sensitive plant species, the habitat in which they occur, and their potential to occur within the project area are summarized in the following table:

Species	Status <sup>1</sup>	Potential to Occur/ Habitat
Showy Indian Clover ( <i>Trifolium amoenum</i> )	FE/--/1B.1/S1	Low. Occurs in coastal scrub grasslands, grassy hillsides, and low, wet swales; found in moist, heavy soils at elevations less than 1,020 feet. The habitat range of this species is known to overlap the general project area. This species generally blooms between the months of March and May and was not observed during the site reconnaissance.
Sonoma Alopecurus ( <i>Alopecurus aequalis</i> var. <i>sonomensis</i> )	FE/--/--	None. This species grows in wet soils, freshwater marshes, and shallow water in Marin and Sonoma counties; preferring areas with moist or marshy ground. This species is known to be threatened by habitat loss due to agricultural development where it is fed on or trampled by cattle. The habitat range of this species is known to overlap the proposed project area, however, it is very unlikely to occur within the direct project footprint. This species was not observed during the site reconnaissance.
Point Reyes horkelia ( <i>Horkelia marinensis</i> )	--/--/1B.2/S2	None. This species primarily grows in coastal prairie habitats along the California coastline, specifically on sandy coastal flats, stabilized dunes, and can also be found in coastal strand and northern coastal scrub, often preferring moist areas within these habitats. The proposed project area does not contain any preferred habitat to support this species, and this species was not observed during the site reconnaissance.
Point Reyes Checkerbloom ( <i>Sidalcea calycosa</i> ssp. <i>rhizomata</i> )	--/--/1B.2/S2	None. This species primarily grows in wet, swampy areas along the Northern California coastline, typically found in marshes, coastal salt marshes, and occasionally in oak woodland openings, with a preference for moist, well-drained soils and partial shade; often found at elevations below 98 feet. The proposed project area does not contain any preferred habitat to support this species, and this species was not observed during the site reconnaissance.
Fragrant Fritillary ( <i>Fritillaria liliacea</i> )	--/--/1B.2/S2	None. This is a low-growing herb that grows in open, hilly grasslands, preferring heavy clay or serpentine soils, and partial shade to full sun. This species is not commonly found in Marin county, and this species was not observed during the site reconnaissance.

<sup>1</sup> **Status:** The format for the species status is [federal status] / [state status] / [CNPS status] / [state rank]. A double dash -- means that there is no official sensitivity status. **Federal Status:** FE – endangered, FT – threatened, FPT- proposed threatened, FC- candidate, DL – federally delisted. **State Status:** SE – endangered, ST – threatened, SCE- candidate endangered, SR – rare, SSC – special concern, FP – fully protected, WL – watch list. **CNPS Status:** 1A – presumed extirpated in California and either rare or extinct elsewhere, 1B – rare, threatened, or endangered in California and elsewhere, 2A – presumed extirpated in California but common elsewhere, 2B - rare, threatened, or endangered in California but common elsewhere, 3 - more information is needed (a review list), 4 – plants of limited distribution (a watch list). **State Rank:** SX – presumed extirpated, SH - possibly extirpated, S1 - critically imperiled, S2 - imperiled, S3 - vulnerable, S4 - apparently secure, S5 - secure, SNR – unranked.

Species	Status <sup>1</sup>	Potential to Occur/ Habitat
Bluff Wallflower ( <i>Erysimum concinnum</i> )	--/--/1B.2/S2	Low. This species grows in a variety of habitats, including coastal bluffs, dunes, prairies, and cliffs. Can be found in areas with full sun to partial shade and grows well in disturbed areas in well-draining soils. Known occurrences of this species have been noted directly south of the proposed project area within the wetland habitat on the southern side of Pt. Reyes – Petaluma Road. However, due to the drastic differences in habitat type it is unlikely that this species will be found within the proposed project area.
Coastal March Milk-Vetch ( <i>Astragalus pycnostachyus var.pycnostachyus</i> )	--/--/1B.2/S2	None. This species grows in coastal salt marshes, wetlands, and shrublands in habitats characterized by well-drained soil, a high water table, and proximity to bodies of water. The proposed project area does not contain any preferred habitat to support this species, and this species was not observed during the site reconnaissance.
Marin Checker Lily ( <i>Fritillaria lanceolata var. tristulis</i> )	--/--/1B.1/S2	Low. This species primarily inhabits coastal grasslands in Marin County, often found in open areas with oak or pine scrub, and can be seen along the edges of woodlands or grassy slopes, usually preferring well-drained soil and partial shade. This species generally blooms between the months of March and May and was not observed during the site reconnaissance.

### Sensitive Wildlife Species

Trileaf’s review of the IPaC revealed four (4) sensitive bird species, two (2) sensitive reptile species, one (1) sensitive amphibian species, and two (2) sensitive insect species. A review of the CNDDDB resulted in one (1) sensitive mammal species, and one (1) additional sensitive amphibian species, for a total of eleven (11) sensitive wildlife species potentially occurring within one mile of the project area. A list of sensitive wildlife species, the habitat in which they occur, and their potential to occur within the project area are summarized in the following table:

Species	Status <sup>2</sup>	Potential to Occur/ Habitat
<b>Mammals</b>		
Pallid Bat ( <i>Antrozous pallidus</i> )	--/--/SSC/S3	Very Low. Occurs mostly in open, dry habitats with rocky areas for roosting but can be found in a wide variety of habitats, including grasslands, shrublands, woodlands, and forests. During the day, roosts in caves, crevices, mines, and occasionally in hollow trees and buildings. At night, roosts in more open sites such as porches and open buildings. Known occurrences of acceptable habitat have been mapped directly north of the proposed project site, however, there is little to no likelihood for this species to be affected within the direct project footprint.
<b>Birds</b>		
California Least Tern ( <i>Sterna antillarum browni</i> )	FE/SE/FP/S2	None. Occurs near sea beaches, bays, large rivers, and salt flats. Nests in loose colonies on barren to sparsely vegetated ground (usually on sandy or gravelly substrate) in areas relatively free of human disturbance. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.
Marbled Murrelet ( <i>Brachyramphus marmoratus</i> )	FT/SE/--/S2	None. Occurs primarily in marine subtidal and pelagic habitats. Nests in large stands of old growth trees that are within a few tens of miles of the coast. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.
Northern Spotted Owl ( <i>Strix occidentalis caurina</i> )	FT/--/--/--	None. This species lives in old-growth forests, particularly Douglas fir forests with high canopy layers, snags, and open spaces for flying underneath and between trees. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.

<sup>2</sup> The format for the species status is [federal status] / [state status] / [CDFW Status] / [state rank]. A double dash -- means that there is no official sensitivity status. **Federal Status:** FE – endangered, FT – threatened, FPT- proposed threatened, FC- candidate, DL – federally delisted. **State Status:** SE – endangered, ST – threatened, SCE- candidate endangered, SR – rare. **CDFW Status:** SSC – special concern, FP – fully protected, WL – watch list. **State Rank:** SX – presumed extirpated, SH - possibly extirpated, S1 - critically imperiled, S2 - imperiled, S3 - vulnerable, S4 - apparently secure, S5 - secure, SNR - unranked.

Species	Status <sup>2</sup>	Potential to Occur/ Habitat
Western Snowy Plover ( <i>Charadrius alexandrinus nivosus</i> )	FT/--/SSC/S3	None. Occurs in barren to sparsely vegetated sand beaches, dry salt flats in lagoons, dredge spoils deposited on beach or dune habitat, levees and flats at salt-evaporation ponds, river bars, along alkaline or saline lakes, reservoirs, and ponds. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.
<b>Reptiles</b>		
Green Sea Turtle ( <i>Chelonia mydas</i> )	FT/--/--/S1	None. Forage in California in lagoons, bays, and coastal inlets. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.
Northwestern Pond Turtle ( <i>Actinemys marmorata</i> )	FPT/	None. Occurs in permanent and intermittent waters of rivers, creeks, small lakes and ponds, marshes, irrigation ditches, and reservoirs. Females have been observed to move up to 325 feet from streams to find a suitable suite for egg laying. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.
<b>Amphibians</b>		
California Red-legged Frog ( <i>Rana draytonii</i> )	FT/--/SSC/Between S2 and S3	None. This species is generally found in the rivers, creeks, and stock ponds of the Sierra foothills and coast range. Prefers quiet permanent waters, but can be found in leaf litter, burrows, and other moist areas far from the water's edge. The subject property has previously been assessed for the presence of California Red-legged Frogs, and habitat was identified generally south of the project area along Lagunitas Creek. However, no habitat was identified within the direct project footprint and this species was not observed during site reconnaissance.
<b>Insects</b>		
Monarch Butterfly ( <i>Danaus plexippus</i> )	FC/--/--/S2	Very low. Occurs in prairies, meadows, grasslands, urban gardens, and along roadsides. Breed only where milkweeds ( <i>Asclepias spp.</i> ) are found. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.

Species	Status <sup>2</sup>	Potential to Occur/ Habitat
Myrtle's Silverspot Butterfly ( <i>Speyeria zerene myrtleae</i> )	FE/--/--	None. This species lives in coastal dunes, scrublands, and prairies; typically found near the coast, at elevations up to 1,000 feet, and within 3-miles of the shore. No suitable habitat can be found within the project area or areas immediately surrounding; species was not observed during site reconnaissance.

No portions of the proposed development footprint contain the important habitat suitability elements for any of the above-listed sensitive wildlife species; none have a high potential to occur within the proposed development footprint itself. No small mammal burrows were observed on or within the immediate vicinity of the site. Therefore, no direct impacts are anticipated to any sensitive wildlife species or their habitat, and no further action is recommended regarding sensitive sensitive wildlife species. There is potential for direct impacts to sensitive plant species, including: Showy Indian Clover, (*Trifolium amoenum*), Bluff Wallflower (*Erysimum concinnum*), Marin Checker Lily (*Fritillaria lanceolata* var. *tristulis*). Trileaf recommends pre-construction botanical surveys be completed during the appropriate blooming period (March 1 – June 1) to identify presence or absence of these species within the project area.

### 3.6 Wildlife Corridors

Wildlife corridors allow for the movement and migration of species between patches of fragmented habitat. Corridors can vary from a narrow strip of habitat that only functions as a conduit for movement, or a large area of intact habitat that is used for movement, dispersal, and other functions such as foraging and breeding. The proposed project is located within the Coastal Corridor within Marin County, dominated by coastal habitat and development. This project is not anticipated to have an impact on wildlife movement corridors in the direct or surrounding project area.

### 3.7 Regulatory Environment

Biological resources located within the project area are subject to regulatory review by federal, state, and local agencies. Under CEQA, impacts associated with a proposed project are assessed pursuant to significance criteria determined by the County Marin. The City of Pt. Reyes Station is considered the lead agency for the CEQA environmental review process and will be responsible for reviewing project issues per city guidelines.

### 3.8 Jurisdictional Areas

The USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. USACE regulatory jurisdiction pursuant to Section 404 of the federal Clean Water Act is founded on a connection or nexus between the water body in question and interstate commerce. This connection may be direct through a tributary system, linking a stream channel with traditional navigable waters used in interstate or foreign commerce, or may be indirect, through a nexus identified in the USACE regulations.

#### 3.8.1 Waters of the U.S.

USACE jurisdiction over non-tidal waters of the United States extends laterally to the ordinary high-water mark (OHWM) or beyond the OHWM to the limit of any adjacent wetlands, if present (33 CFR 328.4). The OHWM is defined as “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area” [33 CFR 329.11(a) (1)]. Jurisdiction typically extends upstream to the point where the OHWM is no longer perceptible.

Using local maps (see Appendix A) in combination with site reconnaissance, the following water bodies have been identified in the table below:

Water Body Type	Water Body Name	Direction from Project Area	Direction from Project Area
Riverine	Lagunitas Creek	S	0.25+ miles

Waters of the U.S. were absent from the site; no water bodies having a perceptible OHWM were identified on site.

#### 3.8.2 Wetlands

The USACE and EPA define “wetlands” as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted to life in saturated soil conditions.” In order to be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied for that wetland characteristic to be met. Trileaf has reviewed the topographic map, soil composition, as well as the National Wetlands Inventory (NWI) Map to determine if the proposed utility route would have an impact on any wetlands or require significant amounts of fill or grading. Additionally, Trileaf performed a field visit and identified that the project site and surrounding area contains no hydrophytic plant species.

### 3.8.3 Nesting Birds

The Migratory Bird Treaty Act (MBTA) protects all common wild birds found in the United States except the house sparrow, starling, feral pigeon, and resident game birds such as pheasant, grouse, quail, and wild turkey. The MBTA makes it unlawful for anyone to kill, capture, collect, possess, buy, sell, trade, ship, import, or export any migratory bird including feathers, parts, nests, or eggs.

The proposed Site is located in the Pacific migratory bird flyway. While the trees and shrubs adjacent to the proposed utility route provide suitable avian nesting habitat, no nests or nesting activity was observed during the biological assessment field survey. Based on field observations, the proposed project is anticipated to have minimal to no impact on nesting birds.

## 4. SENSITIVE BIOLOGICAL RESOURCES IMPACT ANALYSIS

### 4.1 Sensitive Plant and Wildlife Species

- **Sensitive Plant Species:** Sensitive species were not observed during the site reconnaissance. However, there is potential for direct impacts to sensitive plant species, including: Showy Indian Clover, (*Trifolium amoenum*), Bluff Wallflower (*Erysimum concinnum*), Marin Checker Lily (*Fritillaria lanceolata* var. *tristulis*). Trileaf recommends pre-construction botanical surveys be completed during the appropriate blooming period (March 1 – June 1) to identify presence or absence of these species within the project area.
- **Sensitive Wildlife Species:** Potential habitat may be present near the proposed utility route for the following species: Pallid Bat (*Antrozous pallidus*), and California Red-legged Frog (*Rana draytonii*). However, no sensitive wildlife species have a high potential to occur within the immediate vicinity of the proposed undertaking and focused surveys are not recommended. The proposed project is anticipated to have no impact on the above-listed species with a very low to moderate potential to occur within the project area. No vegetation removal is proposed and construction activities will not result in the loss of habitat for any sensitive species.

### 4.2 Jurisdictional Areas

No potentially jurisdictional waters or wetlands are present within the proposed project area. Therefore, installation of the proposed utility route will not impact any jurisdictional areas.

### 4.3 Nesting Birds

The trees and shrubs near the proposed utility route provide suitable nesting habitat for several avian species. MBTA recommends that construction activity avoid the avian nesting season (February - August).

If nesting activity is observed on or in the immediate vicinity of the project site, construction activity may proceed after the nestlings have fledged. If the facility must be installed in the vicinity of an active nest, a biological monitor must be present during all construction activity. Construction activity can be conducted at the discretion of the monitor to ensure that it does not directly or indirectly cause a nest to fail.

If construction activity must occur during the nesting season, a qualified biologist should perform a pre-construction clearance survey to determine the presence/absence of nesting activity onsite and in the vicinity of the project site. The survey will address impacts to nesting birds per the MBTA. If no nesting activity is observed, no further action is required.

#### 4.4 CEQA Biological Resources Checklist

The following CEQA checklist identifies the biological factors that have the potential to be affected by the proposed project. The CEQA impact levels are as follows: potentially significant impact, significant impact with mitigation, less than significant impact, and no impact.

##### **Biological Resources: Would the project:**

- 1. 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 Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS)?**

With respect to plant species, there is a potential for unique or special-status plant species to occur within the proposed project area. The project area has potentially suitable habitat for three special status plant species that were not identified during the survey because as it took place outside the typical blooming period for these plants. One of these species, Bluff Wallflower (*Erysimum concinnum*), has been documented as occurring within the immediate vicinity. Although the impact area for the project is almost entirely within previously disturbed areas and access roads, there is a potential that sensitive species may occur within the immediate vicinity of the project activities and would be subject to inadvertent impacts that could occur during construction. Therefore, impacts to special-status plants are anticipated to be less than significant within implementation of mitigation.

For special-status wildlife, marginal nesting habitat is present for migratory birds protected under the MBTA. There is no indication of past or present nesting activity within the project area. Heavy equipment operation within the lease area, or within the orchard, may result in either direct or indirect impacts to nesting bird species. Furthermore, adjacent ground squirrel burrows may provide marginal habitat for any overwintering burrowing owl or migrating owls. These areas could also be impacted by construction activities, grading and vegetation removal, and noise or other disturbances may cause an individual to abandon a nest resulting in an indirect impact. Therefore, impacts to special status animals are anticipated to be less than significant with implementation of mitigation.

- 2. 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 CDFW or USFWS?**

The proposed Project will not substantially reduce the extent, diversity, or quality of native or other important vegetation. The impact area within the BSA is mostly devoid of any native vegetation (developed). For the habitat that does exist within the BSA that may be inadvertently impacted, most of that vegetation is agricultural (orchards) or non-native annual grassland, and not considered native habitat. Therefore, impacts are anticipated to be less than significant under CEQA guidelines, and no mitigation is needed.

- 3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

The proposed Project is not anticipated to result in permanent or temporary impacts to any wetland or riparian habitat. No wetland or riparian habitats are located on the parcel. Stormwater from the project site would infiltrate into the ground, or surface flow to Cholame Creek during significant rain events. Cholame Creek is approximately 5 miles southwest of the BSA and there would be no direct or indirect impacts to the channel as a result of this project. Therefore, the project would have no impact under CEQA guidelines.

- 4. 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?**

The proposed Project will consist of new structures that will be developed within a previously impacted location. Even though the new structures would act as a barrier for movement, the project is small and is not expected to create a significant impact on the movement of wildlife. Furthermore, the above ground structures will be located at the very top of a steep hill that would not be considered a location that would hinder normal movement activities for wildlife. The surrounding area is wide open with no other impediments. Any wildlife in the area would be expected to use the lower slope of the hill or other open areas. Regardless, the County of San Luis Obispo and CDFW recognize that any permanent loss of habitat for San Joaquin kit fox would require mitigation to offset that loss.

- 5. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?**

Currently, no vegetation removal is proposed, therefore removal permits will not be required and construction activities will comply with local tree and vegetation ordinances. However, if this changes, it is likely that a tree removal permit will be required as there are currently Protected and Heritage trees located in proximity to the proposed project area.

- 6. 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 proposed scope of work will not impact any of the pillars outlined in the Countywide Plan and is not expected to have any adverse impacts.

## **4.5 Direct and Indirect Impacts**

### **Direct Impacts**

While potential habitat may be present for some sensitive species in areas adjacent to the project site, no suitable habitat is present within the direct footprint in which construction will take place. No vegetation removal is proposed. Therefore, the project is anticipated to have no direct impacts on sensitive wildlife species. There is potential for direct impacts to sensitive plant species, including: Showy Indian Clover, (*Trifolium amoenum*), Bluff Wallflower (*Erysimum concinnum*), Marin Checker Lily (*Fritillaria lanceolata* var. *tristulis*). Trileaf recommends pre-construction

botanical surveys be completed during the appropriate blooming period (March 1 – June 1) to identify presence or absence of these species within the project area and determine any potential impacts.

### **Indirect Impacts**

No indirect impacts are anticipated to sensitive wildlife or plant species. However, suitable nesting habitat is present near the project footprint for several avian species. Construction noise may exceed 85 dBA Leq. Construction noise exceeding 60 dBA Leq at a nest site could decrease nesting success. Therefore, the following mitigation measures are recommended:

- If feasible, all vegetation removal and ground disturbance should be scheduled to occur outside of known bird nesting season (February 15 through August 31). If construction activity must occur during the nesting season, a qualified biologist should perform a pre-construction clearance survey to determine the presence/absence of nesting activity onsite and in the vicinity of the project site. The survey will address impacts to nesting birds per the MBTA. If no nesting activity is observed, no further action is required.
- If active nests cannot be avoided, nests shall be identified by a USFWS 10(a) certified biologist, and noise monitoring at the nest site(s) shall be conducted. At no time shall the noise level at a nest site exceed the 60 dBA sound threshold. The USFWS and CDFW shall approve any nest monitoring.

The proposed project will have no significant impact on the CEQA thresholds. It is not anticipated to have a significant impact on candidate, sensitive, or special status species, riparian or other sensitive natural habitat, wetlands, or migratory wildlife corridors. Additionally, it will not conflict with any adopted regulations, plans, or policies.

## **5. CONCLUSIONS**

Based on the efforts undertaken during this assessment, project specifications and the current data made available, we have concluded that there is no potential for the proposed project to have a significant impact on listed or proposed, threatened, and endangered species, species of special concern, migratory birds, jurisdictional waters, designated wetlands, riparian habitat or other sensitive habitat, or wildlife corridors if proposed mitigation measures area followed. Additionally, this project will not conflict with any regulations, plans, or policies.



Samantha Neary  
Assistant Project Manager



Brandy Moss  
Senior Project Manager

## 6. REFERENCES

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<https://viewer.nationalmap.gov/basic>
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<https://www.fws.gov/wetlands/Data/Mapper.html>
- Wetland Training Institute, Inc. 1990. Federal Wetland Regulation Reference Manual. B.N. Goode and R.J Pierce (eds.) WTI 90-1. 281pp

**Appendix A**  
Site Vicinity Map and Aerial Map





Site Location & Surrounding Properties



Site Location



Easement

**Aerial Photographs (2021)**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956



# Inverness Quadrangle, Indiana (2022)

Contour Interval = 10 Feet

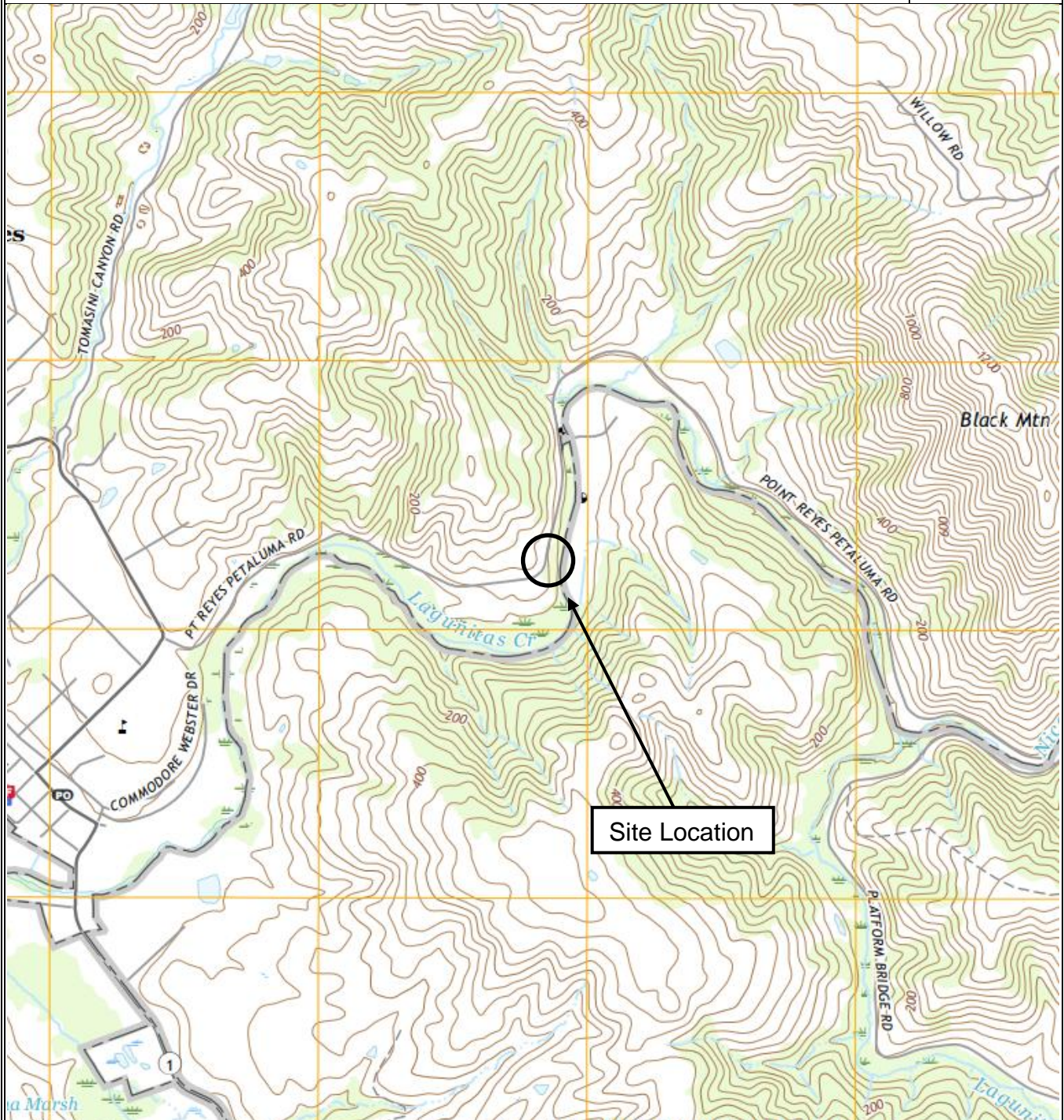
Scale 1 Inch = ~2,000 Feet

Latitude: 38° 4' 39.41" N, Longitude: 122° 47' 15.85" W

Township: T3N Range: R8W Section: S30



North



## Site Vicinity Map

Verizon Wireless – Bernal Peak  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956



**U.S. Fish and Wildlife Service**  
National Wildlife Refuge System Map



North



**USFWS – Wildlife Refuge Map**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956



# North American Migration Flyways



North



## Migratory Bird Flyways – Location Map

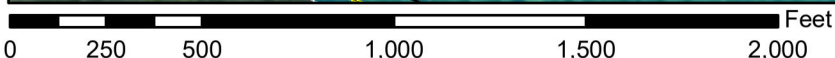
Verizon Wireless – Bernal Peak  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956



# National Flood Hazard Layer FIRMMette



122°47'35"W 38°4'54"N



1:6,000

122°46'57"W 38°4'25"N

Basemap Imagery Source: USGS National Map 2023

## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
MAP PANELS		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		8 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		Digital Data Available
		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards





The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **1/22/2025 at 12:16 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



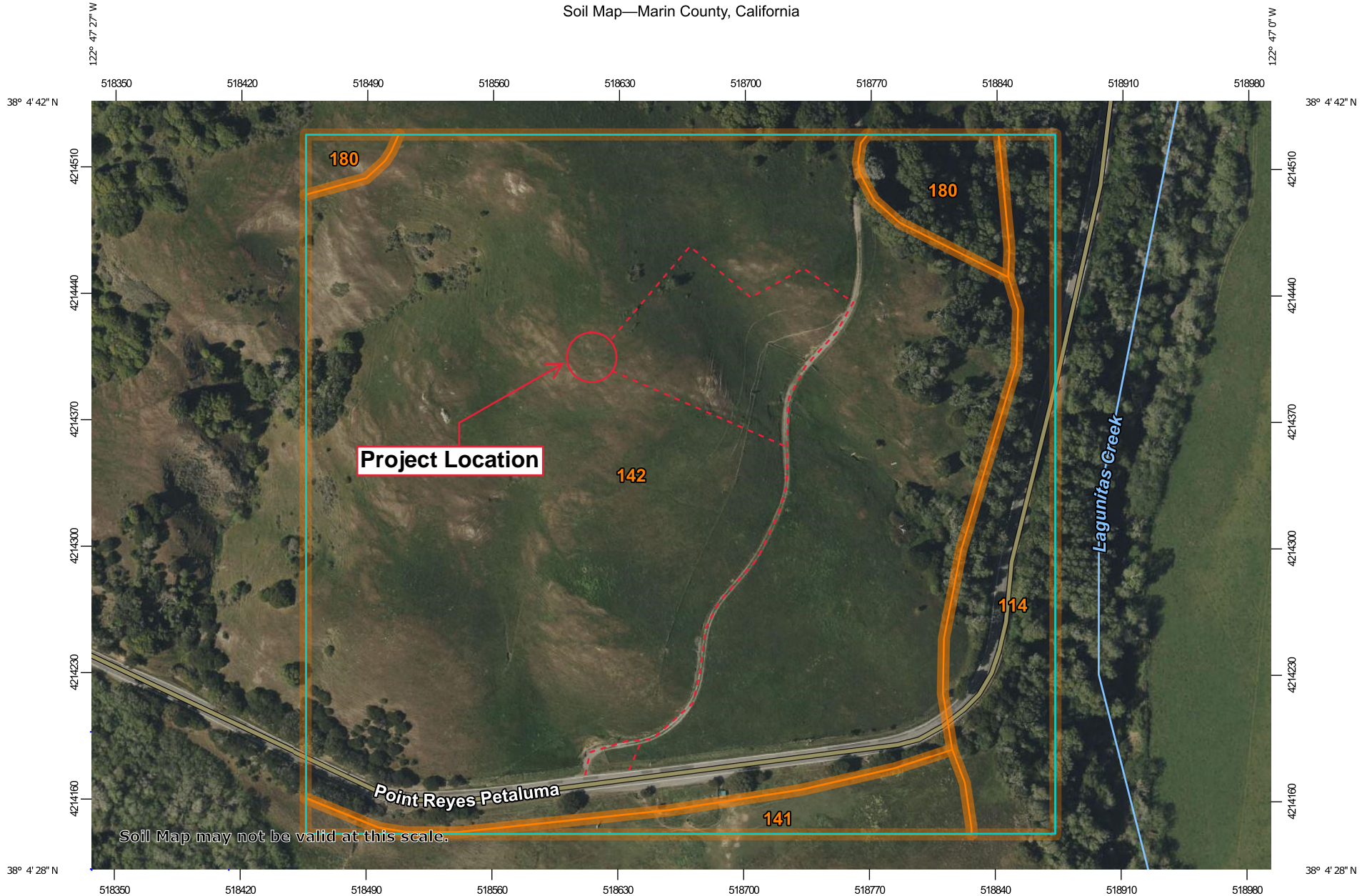
January 22, 2025

### Wetlands

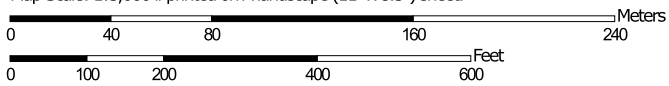
- |   |                                |   |                                   |   |          |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland       |  | Lake     |
|  | Estuarine and Marine Wetland   |  | Freshwater Forested/Shrub Wetland |  | Other    |
|  | Freshwater Pond                |  | Riverine                          |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Soil Map—Marin County, California




Map Scale: 1:3,000 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 10N WGS84


## MAP LEGEND

### Area of Interest (AOI)

 Area of Interest (AOI)

### Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

### Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

### Water Features



Streams and Canals

### Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

### Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Marin County, California

Survey Area Data: Version 18, Sep 8, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Mar 26, 2022—Apr 25, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
114	Cortina gravelly sandy loam, 0 to 6 percent slopes, cool, MLRA 15	4.0	9.9%
141	Los Osos-Bonnydoon complex, 15 to 30 percent slopes	1.5	3.7%
142	Los Osos-Bonnydoon complex, 30 to 50 percent slopes	33.1	82.8%
180	Tocaloma-McMullin complex, 50 to 75 slopes	1.4	3.6%
<b>Totals for Area of Interest</b>		<b>40.0</b>	<b>100.0%</b>

## Marin County, California

### 142—Los Osos-Bonnydoon complex, 30 to 50 percent slopes

#### Map Unit Setting

*National map unit symbol:* hf2g  
*Elevation:* 200 to 1,200 feet  
*Mean annual precipitation:* 25 to 35 inches  
*Mean annual air temperature:* 59 to 63 degrees F  
*Frost-free period:* 270 to 320 days  
*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Los osos and similar soils:* 60 percent  
*Bonnydoon and similar soils:* 20 percent  
*Minor components:* 20 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Los Osos

##### Setting

*Landform:* Hills  
*Landform position (two-dimensional):* Backslope  
*Landform position (three-dimensional):* Side slope  
*Down-slope shape:* Convex  
*Across-slope shape:* Convex  
*Parent material:* Residuum weathered from sandstone and shale

##### Typical profile

*H1 - 0 to 15 inches:* loam  
*H2 - 15 to 30 inches:* clay  
*H3 - 30 to 34 inches:* bedrock

##### Properties and qualities

*Slope:* 30 to 50 percent  
*Depth to restrictive feature:* 20 to 40 inches to paralithic bedrock  
*Drainage class:* Well drained  
*Runoff class:* Very high  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately low to moderately high (0.06 to 0.20 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Available water supply, 0 to 60 inches:* Low (about 4.5 inches)

##### Interpretive groups

*Land capability classification (irrigated):* 6e  
*Land capability classification (nonirrigated):* 6e  
*Hydrologic Soil Group:* D  
*Ecological site:* R015XC032CA - FINE LOAMY CLAYPAN

*Hydric soil rating:* No

## **Description of Bonnydoon**

### **Setting**

*Landform:* Hills

*Landform position (two-dimensional):* Backslope

*Landform position (three-dimensional):* Side slope

*Down-slope shape:* Concave

*Across-slope shape:* Convex

*Parent material:* Residuum weathered from shale, or sandstone

### **Typical profile**

*H1 - 0 to 11 inches:* gravelly loam

*H2 - 11 to 15 inches:* bedrock

### **Properties and qualities**

*Slope:* 30 to 50 percent

*Depth to restrictive feature:* 10 to 20 inches to paralithic bedrock

*Drainage class:* Somewhat excessively drained

*Runoff class:* High

*Capacity of the most limiting layer to transmit water*

*(Ksat):* Moderately high to high (0.57 to 1.98 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Available water supply, 0 to 60 inches:* Very low (about 1.4 inches)

### **Interpretive groups**

*Land capability classification (irrigated):* 6e

*Land capability classification (nonirrigated):* 6e

*Hydrologic Soil Group:* D

*Ecological site:* R015XC037CA - SHALLOW GRAVELLY LOAM

*Hydric soil rating:* No

## **Minor Components**

### **Rock outcrop**

*Percent of map unit:* 5 percent

*Hydric soil rating:* No

### **Yorkville**

*Percent of map unit:* 3 percent

*Hydric soil rating:* No

### **Slumps**

*Percent of map unit:* 3 percent

*Hydric soil rating:* No

### **Slopes more than 50 percent**

*Percent of map unit:* 3 percent

*Hydric soil rating:* No

### **Unnamed, deep**

*Percent of map unit:* 3 percent

*Hydric soil rating:* No

**Tocaloma**

*Percent of map unit:* 3 percent

*Hydric soil rating:* No

**Data Source Information**

Soil Survey Area: Marin County, California

Survey Area Data: Version 18, Sep 8, 2024

**Appendix B**  
Site Photographs





**Site Photograph 1 – Looking north at the Site**



**Site Photograph 2 – Looking south at the Site**

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 3 – Looking east at the Site**



**Site Photograph 4 – Looking west at the Site**

**Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 5** – Looking north away from the Site



**Site Photograph 6** – Looking south away from the Site

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 7 – Looking east away from the Site**



**Site Photograph 8 – Looking west away from the Site**

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 9** – Looking southeast along the utility easement



**Site Photograph 10** – Looking north from access easement towards project area

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 11** – Looking along proposed access / utility easement



**Site Photograph 12** – Looking along proposed access / utility easement

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 13** – Looking along proposed access / utility easement



**Site Photograph 14** – Looking at pooled water towards culvert adjacent to access easement

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 15** – Looking at tree habitat north of proposed project area



**Site Photograph 16** – Looking east along Pt. Reyes – Petaluma Road

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025



**Site Photograph 17** – Looking west along Pt. Reyes – Petaluma Road



**Site Photograph 18** – Looking south toward Lagunitas Creek / wetland habitat

## **Site Photographs**

**Verizon Wireless – Bernal Peak**  
14000 Pt. Reyes Petaluma Road  
Point Reyes Station, California 94956

Photographed:  
January 22, 2025

**Appendix C**  
Reference Material





# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Sacramento Fish And Wildlife Office  
Federal Building  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825-1846  
Phone: (916) 414-6600 Fax: (916) 414-6713

In Reply Refer To:  
Project Code: 2025-0038054  
Project Name: Bernal Peak

01/05/2025 04:27:48 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## **OFFICIAL SPECIES LIST**

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

### **Sacramento Fish And Wildlife Office**

Federal Building

2800 Cottage Way, Room W-2605

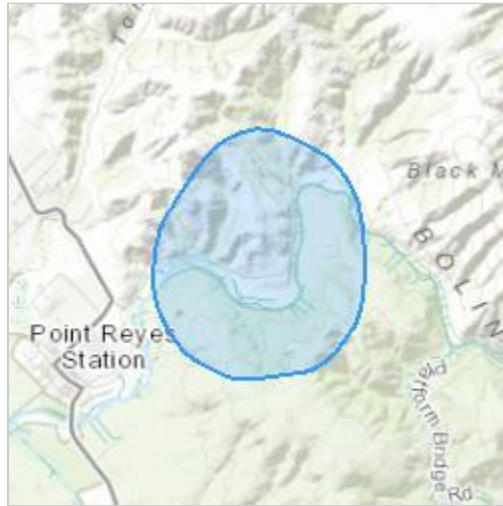
Sacramento, CA 95825-1846

(916) 414-6600

## PROJECT SUMMARY

Project Code: 2025-0038054  
Project Name: Bernal Peak  
Project Type: Communication Tower New Construction  
Project Description: New telecommunications tower installation  
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.07672795,-122.78781622201379,14z>



Counties: Marin County, California

## ENDANGERED SPECIES ACT SPECIES

There is a total of 13 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

**BIRDS**

NAME	STATUS
California Least Tern <i>Sternula antillarum browni</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/8104">https://ecos.fws.gov/ecp/species/8104</a>	Endangered
Marbled Murrelet <i>Brachyramphus marmoratus</i> Population: U.S.A. (CA, OR, WA) There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/4467">https://ecos.fws.gov/ecp/species/4467</a>	Threatened
Northern Spotted Owl <i>Strix occidentalis caurina</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/1123">https://ecos.fws.gov/ecp/species/1123</a>	Threatened
Western Snowy Plover <i>Charadrius nivosus nivosus</i> Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/8035">https://ecos.fws.gov/ecp/species/8035</a>	Threatened

**REPTILES**

NAME	STATUS
Green Sea Turtle <i>Chelonia mydas</i> Population: East Pacific DPS No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6199">https://ecos.fws.gov/ecp/species/6199</a>	Threatened
Northwestern Pond Turtle <i>Actinemys marmorata</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/1111">https://ecos.fws.gov/ecp/species/1111</a>	Proposed Threatened

**AMPHIBIANS**

NAME	STATUS
California Red-legged Frog <i>Rana draytonii</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/2891">https://ecos.fws.gov/ecp/species/2891</a>	Threatened

**FISHES**

NAME	STATUS
Tidewater Goby <i>Eucyclogobius newberryi</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/57">https://ecos.fws.gov/ecp/species/57</a>	Endangered

**INSECTS**

NAME	STATUS
<b>Monarch Butterfly</b> <i>Danaus plexippus</i> There is <b>proposed</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Proposed Threatened
<b>Myrtle's Silverspot Butterfly</b> <i>Speyeria zerene myrtleae</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6929">https://ecos.fws.gov/ecp/species/6929</a>	Endangered

## CRUSTACEANS

NAME	STATUS
<b>California Freshwater Shrimp</b> <i>Syncaris pacifica</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/7903">https://ecos.fws.gov/ecp/species/7903</a>	Endangered

## FLOWERING PLANTS

NAME	STATUS
<b>Showy Indian Clover</b> <i>Trifolium amoenum</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/6459">https://ecos.fws.gov/ecp/species/6459</a>	Endangered
<b>Sonoma Alopecurus</b> <i>Alopecurus aequalis var. sonomensis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/557">https://ecos.fws.gov/ecp/species/557</a>	Endangered

## CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

## **IPAC USER CONTACT INFORMATION**

Agency: Trileaf Corporation  
Name: Samantha Neary  
Address: 2121 W. Chandler Blvd.  
Address Line 2: Suite 108  
City: Chandler  
State: AZ  
Zip: 85224  
Email: s.neary@trileaf.com  
Phone: 4808500575

Scientific Name	Common Name	Federal Status	State Status	State Rank	Rare Plant Rank	CDFW Status	Taxon Group
Horkelia marinensis	Point Reyes horkelia	None	None	S2	1B.2		Dicots
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	None	None	S2	1B.2		Dicots
Fritillaria liliacea	fragrant fritillary	None	None	S2	1B.2		Monocots
Rana draytonii	California red-legged frog	Threatened	None	S2S3		SSC	Amphibians
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	None	None	S2	1B.2		Dicots
Erysimum concinnum	bluff wallflower	None	None	S2	1B.2		Dicots
Astragalus pycnostachyus var. pycnostachyus	coastal marsh milk-vetch	None	None	S2	1B.2		Dicots
Fritillaria lanceolata var. tristulis	Marin checker lily	None	None	S2	1B.1		Monocots
Antrozous pallidus	pallid bat	None	None	S3		SSC	Mammals
Rana draytonii	California red-legged frog	Threatened	None	S2S3		SSC	Amphibians



## Telephone Correspondence

Date: 12/2/2024

Project Name: Bernal Peak Trileaf Project #: 755358

Subject: Regarding Need for County-Approved Biologist

Name: Mercedes McMath

Company: Marin County

Phone #: 415-473-6292

Note: Spoke with county representative on the phone regarding a client-ordered biological assessment to see if there was a list of county-approved vendors to use and/or if there were any special requirements for submitting a biological assessment to the County. Ms. McMath informed me that there was not an approved list of vendors and that our in-house report would suffice.

Recorded by:

**Appendix D**  
Qualifications





## Professional Resume

# SAMANTHA NEARY, M.S.

ASSISTANT PROJECT MANAGER

## Education

Biology, M.S. / Emphasis in Marine Ecology  
San Diego State University / San Diego, CA

Zoology, B.S. / Emphasis in Limnology  
University of Wisconsin-Madison / Madison, WI

## Areas of Expertise

Ms. Neary has experience performing field visits for National Environmental Policy Act (NEPA) and Section 106 reviews for commercial real estate, lending, and wireless telecommunications projects. This includes characterization of habitats, pre-build surveys for critical species habitats, and migratory bird evaluations. In addition, Ms. Neary has experience overseeing and completing field surveys and biological assessment reports for CEQA analysis.

Environmental service expertise includes:

Phase I/II Environmental Site Assessments  
Property Condition Assessments (PCA)  
Indoor Air Quality Assessments  
National Wetland Inventory Maps  
Flood Insurance Rate Maps  
Critical Habitat Maps  
Environmental Evaluation Summaries  
Soil Characterization  
Field Reconnaissance

Section 106 Compliance  
NEPA Environmental Assessments  
Migratory Bird Evaluations  
Form 620/621 Submittals  
Historical Topographic Maps and Aerial Imagery  
Mold and Lead-Based Paint Surveys  
Local Government Consultation  
Land Use History

## Certifications/Affiliations

Articulated, Mobile, Single and Extension, and Stepladder Safety  
Basic Wetland Delineation Course (2024)  
Desert Tortoise Council Introductory Course  
OSHA 40-Hour HAZWOPER  
Western Society of Naturalists, member since 2016  
American Academy of Underwater Scientists, member since 2017  
AAUS Certified Scientific Diver  
Adult and Pediatric First Aid/CPR/AED/O<sub>2</sub>



## Professional Resume

# BRANDY MOSS

## SENIOR PROJECT MANAGER

### Education

B.S. Environmental Technology Management  
Arizona State University/ Mesa, AZ

### Areas of Expertise

Ms. Brandy Moss has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as performing National Environmental Policy Act (NEPA) reviews for commercial real estate, lending, and wireless telecommunications projects. Ms. Moss operates as the primary point-of-contact for clients over a large geography, specializing within the Western Region of the United States.

Environmental service expertise includes:

Asbestos Inspections	Phase I/II Environmental Site Assessments
Construction Environmental Oversight	Preliminary Risk Assessments
Business Development	Records Search with Risk Assessment (RSRA)
Environmental Evaluation Summaries	SBA Loans
Environmental Baseline Studies	Soil and Groundwater Management Plans
FCC Regulatory Compliance	Soil Characterization
Health and Safety Plans	Soil Management and Disposal
Migratory Bird Evaluations	Transaction Screen Assessments
Native American Consultation	Waste and Recycling Implementation and Planning
NEPA Environmental Assessments	Vendor Management

Additionally, Ms. Moss has experience in conservation and water monitoring at ASARCO Ray Mine, along with waste and recycling implementation for Gila River Gaming Enterprises (GRGE). Ms. Moss has specialized experience performing, planning, and managing Phase I and Phase II Environmental Assessments for various commercial, industrial, agricultural, and residential properties.

### Certifications/Affiliations

Adult Child Infant CARE CPR & First Aid Certification  
Burrowing Owl Survey Certification, U.S. Fish and Wildlife Service and Arizona Game and Fish  
Certified Asbestos Building Inspector – (EPA License #CA-089-05)  
Environmental Professional (EP) as defined by ASTM Standard E1527-21 (AAI)  
OSHA 40-Hour HAZWOPER