

**Biological Resources Impact Analysis
CVL02665, Laguna Creek Trailhead
Sacramento, Los Angeles County, California**

Prepared for:

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SECTION 1: INTRODUCTION

This report contains the findings of a Biological Resources Impact Analysis conducted by Environmental Assessment Specialists, Inc. (EAS) on a proposed AT&T Mobility, LLC (AT&T) cellular facility, CVL02665 (Laguna Creek Trailhead) in Sacramento County, California. The project site is generally located north of State Route 104, south of State Route 16, east of State Route 99, and west of State Route 124, and is depicted on the Elk Grove, California U.S. Geological Survey (USGS) 7.5-minute topographic map.

AT&T proposes the installation of a new unmanned telecommunications facility at this location. Proposed is the installation of a new AT&T 80-foot-tall faux water tank with antennas and associated equipment within a 38-foot by 22-foot lease area surrounded by a 8-foot high block wall. Utility line trenching will travel approximately 560-feet southwest from the lease area to Vineyard Road and the existing utility sources. A new 15-foot-wide access road will be installed to provide access to the site from Vineyard Road.

The project site was surveyed on July 9, 2024 by qualified EAS biologist Kyle Workman. 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. Based on current site conditions and suitable habitat requirements of sensitive species, this report provides an assessment of the sensitive resources found on the site and analyzes the biological significance of the site in view of federal, state, and local laws and policies.

SECTION 2: METHODOLOGY

2.1 - BIOLOGICAL RESOURCES

Data regarding biological resources on the project site were obtained through a literature review that included data on biological resources in the project vicinity and applicable reference materials provided by AT&T.

Sensitive biological resources present, or potentially present, onsite were identified through a literature review using the following resources: California Department of Fish and Wildlife (CDFW 2024), California Natural Diversity Data Base (CNDDB 2024), and the California Native Plant Society (Tibor 2001 and CNPSEI 2024). For the purpose of this report, “sensitive” or “special status” species are those plant or wildlife species that are federally and/or state listed species, proposed for listing, candidate species and CDFW Species of Special Concern.

An initial review indicated that the project site is located within the Laguna Creek Parkway, which is a linear open space corridor that follows the Laguna Creek watershed. Kyle Workman 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, on field data sheets. These data sheets are included in Appendix A. Special attention was paid to plant communities to determine the presence or potential occurrence of any sensitive species that may occur on the project site.

SECTION 3: EXISTING CONDITIONS

3.1 - SITE DESCRIPTION

The biological assessment survey of the project site was conducted on July 9, 2024. Weather conditions included a temperature of approximately 88 degrees Fahrenheit, winds of 1 to 3 miles per hour, and clear conditions. The site is specifically located within the Laguna Creek Parkway, east of the intersection of Vineyard Road and Crystal Creek Drive, Sacramento, California. Land use adjacent to the site generally consists of the Laguna Creek Parkway followed by residential development to the north, south and west, and undeveloped open space to the east. Recreational hiking and horse trails occur within the vicinity of the site.

AT&T proposes the installation of a new unmanned telecommunications facility at this location. Proposed is the installation of a new AT&T 80-foot-tall faux water tank with antennas and associated equipment within a 38-foot by 22-foot lease area surrounded by a 8-foot high block wall. Utility line trenching will travel approximately 560-feet southwest from the lease area to Vineyard Road and the existing utility sources. A new 15-foot-wide access road will be installed to provide access to the site from Vineyard Road.

3.2 - VEGETATION

The project site is located within undeveloped areas associated with the Laguna Creek Parkway. The proposed lease area will be developed within a fallow field that appears to be routinely cleared of vegetation. Vegetation onsite primarily consists of non-native grasses and ruderal (weedy) species. Common species observed include slender wild oats (*Avena barbata*), shortpod mustard (*Hirschfeldia incana*), and brome grass (*Bromus* sp.). Native trees and shrubs occur within the immediate vicinity of the project site but will not be impacted by the proposed facility. Species observed during the survey include valley oak tree (*Quercus lobata*), interior live oak (*Quercus wislizeni*), and California black walnut (*Juglans hindsii*). Ornamental trees and shrubs associated with the nearby residential areas were observed, but will not be impacted by the proposed facility. A complete list of plant species observed on or in the vicinity of the project site can be found in Appendix A: Field Data Sheets.

3.3 - SSHCP LAND COVER TYPES

The South Sacramento Habitat Conservation Plan (SSHCP) includes potential land cover types present within the project site, called baseline land cover. The entire project site is mapped as Valley Grassland

Land Cover. The SSHCP defines the Valley grassland land cover type as an annual herbaceous plant community characterized by naturalized annual grasses and forbs. Vegetation on and within the vicinity of the site primarily consists of non-native grasses including slender wild oats and brome grass. Oak trees occur within the immediate vicinity of the site proposed project lease area, but will not be impacted by the development of the facility.

Laguna Creek, a jurisdictional drainage feature is located approximately 200-feet north of the project site and flows through the site's associated parcel. Additionally, a potential vernal pool was observed approximately 100-feet north of the project site. No impacts are anticipated to occur to Laguna Creek or the vernal pool during the development and ongoing maintenance of the proposed facility.

3.4 - GENERAL WILDLIFE

The project site and surrounding area provide habitat for wildlife species that commonly occur in non-native grassland, oak woodland, and ornamental communities. No amphibian, reptilian, or mammalian species were observed or detected during the field survey. Avian species observed/detected include:

- Northern mockingbird (*Mimus polyglottos*)
- Western scrub jay (*Aphelocoma californica californica*)
- California towhee (*Pipilo crissalis*)
- Western bluebird (*Sialia mexicana*)
- Mourning dove (*Zenaida macroura*)
- Acorn woodpecker (*Melanerpes formicivorus*)
- California quail (*Callipepla californica*)
- Lesser goldfinch (*Carduelis psaltrina*)

Other wildlife species expected to occur onsite include western fence lizard (*Sceloporus occidentalis*), house finch (*Carpodacus mexicanus*), and California ground squirrel (*Spermophilus beecheyi*).

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 U.S. Fish and Wildlife Service (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.

The California Department of Fish and Wildlife (CDFW) administers the California Endangered Species Act (CESA). The State of California considers an “endangered” species one whose prospects of survival and reproduction are in immediate jeopardy, a “threatened” species is one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management, and a “rare” species is one present in such small numbers throughout its range that it may become endangered if its present environment worsens. The term “rare” species applies to California native plants. State threatened and endangered species are fully protected against take, as defined above. “Species of special concern” is an informal designation used by CDFW for some declining wildlife species that are not state candidates. This designation does not provide legal protection, but signifies that these species are recognized as sensitive by CDFW.

The California Native Plant Society (CNPS) has developed an inventory of California’s sensitive plant species (Tibor 2001). This inventory summarizes information on the distribution, rarity, and endangerment of California’s vascular plants. The inventory is divided into four lists based on the rarity of the species. In addition, the CNPS provides an inventory of plant communities that are considered sensitive by the state and federal resource agencies, academic institutions, and various conservation groups. Determination of the level of sensitivity is based on the number and size of remaining occurrences as well as recognized threats.

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 (CNDDDB 2024). 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 CDFW.

The following discussion describes the special-status plants, wildlife, and habitats that have been afforded special recognition by federal, state, or local resource agencies or organizations and are known to occur in the region of the project site. Sources used for the classification of sensitive resources are as follows:

- Plants - California Department of Fish and Wildlife (CDFW March 2024), California Natural Diversity Data Base (CNDDDB 2024), and California Native Plant Society (Tibor 2001 and CNPSEI 2024)
- Habitats - CNDDDB (2024), Holland (1986)
- Wildlife - CDFW (March 2024), CNDDDB (2024)

A review of the CNDDDB and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants resulted in a list of 8 sensitive plant species, 14 sensitive wildlife species, and 2 sensitive plant communities that occur within the Elk Grove, California USGS topographic quadrangle.

The following set of criteria was used to determine each species' potential for occurrence on the site:

- Present: Species occurs on the site
- High: The site is within the known range of the species and suitable habitat exists.
- Moderate: The site is within the known range of the species and limited suitable habitat exists.
- Low: The site is within the known range of the species and there is marginally suitable habitat.
- Absent/No Habitat Present: The site does not contain suitable habitat for the species, the species was not observed, or the site is outside the known range of the species.

Table 1
Threatened, Endangered, Candidate and Proposed Plant Species and the potential to be affected by the Proposed Action.

Species	Status	General Habitat and Distribution	Presence of Suitable Habitat Within the Project Area	Potential For Occurrence
Plants				
Boggs Lake hedge-hyssop (<i>Gratiola heterosepala</i>)	Federal: N/A State: CE, CRPR, 1B.2	Vernal pools and margins of lakes/ponds	No	Not Present. No vernal pools occur within the project footprint. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
Dwarf downingia (<i>Downingia pusilla</i>)	Federal: N/A State: CRPR, 2B.2	Vernal pools	No	Not Present. No vernal pools occur within the project footprint. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
Hoary navarretia (<i>Navarretia eriocephala</i>)	Federal: N/A State: 4.3	Gravelly, clay soils. Cismontane woodland, valley and foothill grassland.	No	Not Present. There is no suitable, occupied or designated habitat on or within the vicinity of the site.
Hogwallow starfish (<i>Hesperervax caulescens</i>)	Federal: N/A State: 4.1	Valley and foothill grassland (Mesic clay), Vernal pools (shallow).	No	Not Present. There is no suitable, occupied or designated habitat on or within the vicinity of the site.
Legenere (<i>Legenere limosa</i>)	Federal: N/A State: CRPR, 1B.1	Vernal Pools	No	Not Present. No vernal pools occur within the project footprint. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
Sanford's arrowhead (<i>Sagittaria sanfordii</i>)	Federal: N/A State: CRPR, 1B.2	Emergent marsh habitat, typically associated with drainages, canals, or irrigation ditches	No	Not Present. There is no suitable, occupied or designated habitat on or within the vicinity of the site. Laguna Creek occurs approximately 200-feet north of the project site, but will not be impacted by the proposed facility.
Slender Orcutt grass (<i>Orcuttia tenuis</i>)	Federal: FT State: CE, CRPR, 1B.1	Vernal pools	No	Not Present. No vernal pools occur within the project footprint. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.

Table 2
Threatened, Endangered, Candidate and Proposed Wildlife Species and the potential to be affected by the Proposed Action.

Species	Status	General Habitat and Distribution	Presence of Suitable Habitat Within the Project Area	Affected by Project (Yes, No or Possibly)
BIRDS				
Burrowing owl (<i>Athene cunicularia</i>)	Federal: -- State: Candidate Endangered	Forages in open areas including grasslands, savannahs, deserts, and early successional stages of shrub and forest communities. Nests in underground burrows	Yes	Moderate. No burrows suitable for burrowing owl were observed within the impact area. Suitable foraging habitat occurs onsite.
Cooper's hawk (<i>Accipiter cooperi</i>)	Federal: -- State: SA	Favors forested and riparian habitats' may forage in adjacent grassland and agricultural fields	No	Low. No heavily forested areas occur on or within the vicinity of the site. Marginally suitable foraging habitat occurs within the vicinity of the site.
Swainson's hawk (<i>Buteo swainsoni</i>)	Federal: -- State: CT	Open grasslands, fields, and meadows for foraging. Isolated trees in close proximity to foraging habitat are used for perching and nesting.	Yes	Moderate. Suitable foraging habitat occurs on the site and isolated trees are located within the vicinity of the site.
Tricolored blackbird (<i>Agelaius tricolor</i>)	Federal: -- State: CE, CSC	Colonia nester in cattails, bulrush, or blackberries associated with marsh habitats	No	Low. Laguna Creek occurs approximately 200-feet north of the site, but no suitable habitat occurs within the proposed impact area.
White-tailed kite (<i>Elanus leucurus</i>)	Federal: -- State: CFP	Open grasslands, fields, and meadows are used for foraging. Isolated trees in close proximity to foraging habitat are used for perching and nesting.	Yes	Moderate. Suitable foraging habitat occurs on the site and isolated trees are located within the vicinity of the site.
REPTILES				
Giant gartersnake (<i>Thamnophis gigas</i>)	Federal: FT State: CT	Rivers, canals, irrigation ditches, rice fields, and other aquatic habitats with slow moving water and heavy emergent vegetation	No	Low. Laguna Creek occurs approximately 200-feet north of the site, but no suitable habitat occurs within the proposed impact area.
Northwestern pond turtle (<i>Actinemys marmorata</i>)	Federal: PT State: CSC	Ponds, rivers, streams, wetlands, and irrigation ditches with associated marsh habitat	No	Low. Laguna Creek occurs approximately 200-feet north of the site, but no suitable habitat occurs within the proposed impact area.
INVERTEBRATES				
Vernal Pool Fairy Shrimp (<i>Branchinecta lynchi</i>)	Federal: FT State: --	Vernal pools or other seasonal wetlands, usually in grasslands.	No	Not Present. No vernal pools present onsite. There is no suitable, occupied or designated habitat on or within the vicinity of the site. A potential vernal pool occurs approximately 100-feet north of the project site, but

				will not be impacted by the proposed facility.
California linderiella (Linderiella occidentalis)	Federal: -- State: --	Vernal pools or other seasonal wetlands, usually in grasslands.	No	Not Present. No vernal pools present onsite. There is no suitable, occupied or designated habitat on or within the vicinity of the site. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
Midvalley fairy shrimp (Branchinecta mesoatlantica)	Federal: -- State: --	Vernal pools or other seasonal wetlands, usually in grasslands.	No	Not Present. No vernal pools present onsite. There is no suitable, occupied or designated habitat on or within the vicinity of the site. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
Valley elderberry longhorn beetle (Desmoceris californicus dimorphus)	Federal: FT State: --	Dependent upon elderberry shrubs as primary host species	No	Not Present. No elderberry shrubs are present on the project site.
Vernal pool tadpole shrimp (Lepidurus packardii)	Federal: FE State: --	Vernal pools or other seasonal wetlands, usually in grasslands.	No	Not Present. No vernal pools present onsite. There is no suitable, occupied or designated habitat on or within the vicinity of the site. A potential vernal pool occurs approximately 100-feet north of the project site, but will not be impacted by the proposed facility.
FISH				
Steelhead - Central Valley DPS (Oncorhynchus mykiss irideus)	Federal: FT State: --	Anadromous species requiring freshwater water courses with gravelly substrates for breeding.	No	Not Present. Laguna Creek occurs approximately 200-feet north of the site, but no suitable habitat occurs within the proposed impact area.

A review of the CNDDDB and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants resulted in a list of 8 sensitive plant species, 14 sensitive wildlife species, and 2 sensitive plant communities that occur within the Elk Grove, California USGS topographic quadrangle.

The sensitive plant species include:

- Boggs Lake hedge-hyssop (*Gratiola heterosepala*)
- Dwarf downingia (*Downingia pusilla*)
- Hoary navarretia (*Navarretia eriocephala*)

- Hogwallow starfish (*Hesperevax caulescens*)
- Legenere (*Legenere limosa*)
- Sanford's arrowhead (*Sagittaria sanfordii*)
- Slender Orcutt grass (*Orcuttia tenuis*)
- Slender Orcutt grass (*Orcuttia tenuis*)

Proposed development will be contained within the Laguna Creek Parkway and vegetation on the project site appears to be routinely cleared as part of ongoing maintenance of the open space area. Evidence of surface disturbance on and in the immediate vicinity of the site has greatly reduced the potential for sensitive plant species to occupy the area. No vernal pools were observed within the project site footprint. Therefore, none of the above-listed sensitive plant species are anticipated to occur onsite, and the proposed project is not anticipated to result in any impacts to sensitive plant species. No further action is recommended with regard to sensitive plant species.

The sensitive wildlife species include:

- Burrowing owl (*Athene cunicularia*)
- California linderiella (*Linderiella occidentalis*)
- Cooper's hawk (*Accipiter cooperi*)
- Giant gartersnake (*Thamnophis gigas*)
- Midvalley fairy shrimp (*Branchinecta mesoamericana*)
- Northwestern pond turtle (*Actinemys marmorata*)
- Steelhead - south/central California coast ESU (*Oncorhynchus mykiss irideus*)
- Swainson's hawk (*Buteo swainsoni*)
- Tricolored blackbird (*Agelaius tricolor*)
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*)
- Vernal pool fairy shrimp (*Branchinecta lynchi*)
- Vernal pools tadpole shrimp (*Lepidurus packardii*)
- White-tailed kite (*Elanus leucurus*)
- Yellow-billed magpie (*Pica nuttalli*)

Proposed development will be contained within the Laguna Creek Parkway and vegetation on the project site appears to be routinely cleared as part of ongoing maintenance of the open space area. No small burrows were observed on the project site. The site contains marginally suitable habitat for burrowing owl, giant garter snake, white-tailed kite, and Swainson's hawk.

The sensitive plant species include:

- Great Valley oak riparian forest
- Northern hardpan vernal pool

No sensitive plant communities occur on the project site.

3.6 - 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.

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. Recently, the federal courts have restricted USACE jurisdiction over waters that are not directly connected to traditional navigable waters (isolated waters), thereby increasing the focus on clearly establishing the physical connection between the subject water body(ies) as a tributary to traditional navigable waters or otherwise by directly establishing the nexus with interstate commerce.

During the biological assessment survey, the site was evaluated according to the guidelines provided in the USACE 1987 Manual (i.e. Environmental Laboratory, 1987). Waters of the U.S. were absent from the site. Laguna Creek, a jurisdictional drainage feature is located approximately 200-feet north of the project site. Additionally, a potential vernal pool was observed approximately 100-feet north of the project site. No impacts are anticipated to occur to Laguna Creek or the vernal pool.

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 in order for that particular wetland characteristic to be met. Several parameters may be analyzed to determine whether the criteria are satisfied.

The project site and surrounding area contain plant species commonly found in disturbed/developed and ornamental communities. No hydrophytic plant species were observed on the project site; therefore, it was not necessary to examine the other two wetland criteria (hydrology and soils), since all three criteria must be met where wetlands are present. No jurisdictional wetlands will be impacted by the installation of the proposed facility.

3.7 - 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 Wildlife birds such as pheasant, grouse, quail, and wild turkey. Resident Wildlife birds are managed separately by each state. 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.

California Fish and Game (CFG) Code 3503 makes it illegal to destroy any birds' nest or any birds' eggs that are protected under the MBTA. CFG Code 3503.5 further protects all birds in the orders *Falconiformes* and *Strigiformes* (birds of prey, such as hawks and owls) and their eggs and nests from any form of take.

No avian nests or nesting activity were observed during the field survey. The trees located within the immediate vicinity of the project site provide suitable avian nesting habitat.

3.8 - SOUTH SACRAMENTO HABITAT CONSERVATION PLAN

The proposed project is located within the Laguna Creek Parkway and project-specific requirements may be conditioned upon project application with the County of Sacramento. The project site occurs within the boundaries of South Sacramento Habitat Conservation Plan (SSHCP); therefore, the proposed project is required to demonstrate project consistency with the provisions of this plan. The project is located within the Laguna Creek Wildlife Corridor and within Preserve M-1 and Linkage Preserve L-6. No significant impacts to the long-term conservation goals and objectives of the SSHCP are anticipated to result from the proposed project. The County of Sacramento may implement exemptions based on the limited size and operational requirements of the proposed project.

SECTION 4: SENSITIVE BIOLOGICAL RESOURCES IMPACT ANALYSIS

4.1 - SENSITIVE PLANT AND WILDLIFE SPECIES

- **Sensitive Plant Species:** The project site contains no suitable habitat for any sensitive plant species. The site will be developed within non-native grassland and no vernal pools occur onsite. Therefore, no sensitive plant species have a moderate or high potential to occur onsite and focused surveys are not recommended.
- **Sensitive Wildlife Species:** Proposed development will be contained within the Laguna Creek Parkway and vegetation on the project site appears to be routinely cleared as part of ongoing maintenance of the open space area. No small burrows were observed on the project site. The site contains marginally suitable habitat for burrowing owl, giant gartersnake, white-tailed kite, and Swainson's hawk.
- **Raptors:** Burrowing owl, a state species of concern, is found in grassland habitats, lowland scrub, agricultural land, and open areas as a year-long resident. As a critical habitat feature, they require rodent or other fossorial burrows for roosting and nesting cover, with the preferred burrow being the California ground squirrel (*Spermophilus beecheyi*). They may also use pipes, culverts, and nest boxes where burrows are scarce. Reasons for their decline include habitat destruction insecticide, poisoning, rodenticide, and shooting.
- A habitat assessment for burrowing owl was conducted during the focused plant survey efforts. No burrowing owl or sign of burrowing owl were observed during the habitat assessment surveys. No burrows suitable were observed on or within the vicinity of the project site and the proposed facility is not expected to adversely affect burrowing owl. A pre-construction clearance survey is recommended within 14 days of any construction activities to confirm that no burrowing owls have migrated to the site.
- The white-tailed kite, a CDFW Fully Protected species, and Swainson's hawk, a CDFW listed Threatened species nests in oak savannahs and forages for voles in meadows and grasslands. No trees or potential nesting habitat will be removed during the construction of the proposed facility. The site contains marginally suitable foraging habitat for these species. A habitat assessment for white-tailed kite and Swainson's hawk was conducted in both April and May of 2024 during the focused plant survey effort. No white-tailed kite or Swainson's hawk were observed on or within the vicinity of the site during the focused survey.

- Impacts to suitable foraging habitat for white-tailed kite and Swainson's hawk will be limited in size and can be considered less than significant on a local or regional basis. With adherence to the Best Management Practices listed in Section 4.2 below, the installation of the proposed facility is not likely to adversely affect white-tailed kite or Swainson's hawk.
- The project is located approximately 200-feet south of Laguna Creek and contains suitable upland dispersing habitat for giant gartersnake, which is federally and state listed as threatened. Vegetation on the project site consists of non-native grassland and no wetlands occur on the site. Several mitigation measures are listed within the best management practices in Section 4.2 to limit potential impacts to giant gartersnake. A pre-construction clearance survey is recommended within 14 days of any construction activities to confirm that no giant gartersnake occur onsite.
- **Sensitive Plant Communities:** No sensitive plant communities occur on the project site; none will be impacted by the proposed development.

4.2 - AVOIDANCE AND MITIGATION MEASURES

SSHCP has several Avoidance and Mitigation Measures (AMM) that are required to mitigate for potential impacts to sensitive species that are covered under the HCP. With adherence to the proposed AMMs as well as the BMPs listed below, the proposed impacts would be reduced to less than significant levels.

- Burrowing Owl – The Valley Grassland found on and within the vicinity of the site provides suitable foraging habitat for burrowing owl. The SSHCP AMM that applies for the proposed project is WBO-2 (Western Burrowing Owl Pre-Construction Surveys) are required prior to the start of construction activities.
- White-tailed kite - The SSHCP requires AMMs for covered raptor species to avoid direct and indirect effects associated with the development of the proposed facility. The four AMMs (Raptor-1 through Raptor-4) include raptor surveys and pre-construction surveys to avoid impacts.
- Swainson's hawk – The SSHCP requires AMMs for Swainson's hawk to avoid direct and indirect effects associated with the development of the proposed facility. The five AMMs (SWHA-1 through SWHA-5) should be implemented as needed.

4.3 - BEST MANAGEMENT PRACTICES

The following Best Management Practices (BMPs) and conservation measures are required to limit potential impacts to sensitive plant and wildlife species. With the implementation of the following BMPs as well as the AMMs listed above, the proposed impacts would be reduced to less than significant levels.

- All construction personnel associated with the project should attend a worker education- training program conducted by a qualified biologist. This instruction will include training on distribution, general behavior and ecology, protection status, and procedures for reporting encounters.
- The area of disturbance should be confined to the smallest practical area and use previously disturbed areas as much as practical. All work boundaries should be flagged to minimize surface disturbance. Silt fencing is required to prevent discharge into the drainage feature north of the site.
- Items that could pose a risk of entanglement such as ropes, cables, lines, etc. will be kept secure. Pipes, culverts, and similar materials will be stored to prevent wildlife species from using these as temporary refuges, and these materials will be inspected each morning for the presence of animals prior to being moved.
- To prevent inadvertent entrapment of wildlife species during construction, all open trenching, if left overnight, shall be covered up. All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day and removed completely from the site daily.
- All equipment All equipment will be maintained such that there will be no leaks of automotive fluids such as gasoline, oils, or solvents.

4.4 - JURISDICTIONAL AREAS

Laguna Creek, a jurisdictional drainage feature is located approximately 200-feet north of the project site. Additionally, a potential vernal pool was observed approximately 100-feet north of the project site. No impacts are anticipated to occur to Laguna Creek or the vernal pool.

4.5 - NESTING BIRDS

The trees and shrubs located within the immediate vicinity of the project site provide suitable nesting habitat for several avian species. Additionally, although not considered natural nesting habitat, the existing facility provides suitable nest sites. Therefore, pursuant to the MBTA and CFG Code, installation of the proposed facility should be conducted outside the nesting season. The nesting season generally extends from early February through August, but can vary slightly from year to year based upon seasonal weather conditions.

If facility installation must occur during the nesting season, a qualified biologist should conduct a nesting bird survey to identify any potential nesting activity. If active nests are observed, construction activity must be prohibited within a 500-foot (~160-meter) buffer around the nest until the nestlings have fledged. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor.

4.6 - SOUTH SACRAMENTO HABITAT CONSERVATION PLAN

The proposed project is located within the Laguna Creek Parkway and project-specific requirements may be conditioned upon project application with the County of Sacramento. The project site occurs within the boundaries of South Sacramento Habitat Conservation Plan (SSHCP); therefore, the proposed project is required to demonstrate project consistency with the provisions of this plan. The project is located within the Laguna Creek Wildlife Corridor and within Preserve M-1 and Linkage Preserve L-6. No significant impacts to the long-term conservation goals and objectives of the SSHCP are anticipated to result from the proposed project. The County of Sacramento may implement exemptions based on the limited size and operational requirements of the proposed project.

SECTION 5: REFERENCES

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Project Location

Figure 1



0 125 250 375 500
 Feet
 1 inch equals 500 feet

Basemap: Esri Community Maps Contributors, County of Sacramento, California State Parks, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS

SSHCP Land Cover

Figure 2

Appendix A: Field Data Sheets and Site Photographs

Field Notes – CVL02665

Date: July 9, 2024

Location: Sacramento, Sacramento County, California

Time: 12:05 pm to 1:30 pm

Weather Conditions: 1 to 3 mile per hour winds, clear skies with a temperature of 88 degrees

Plant Community/Site description: Site will be located within a fallow field within the Laguna Creek Parkway. Several hiking/equestrian trails surround the site and vegetation appears to be routinely cleared as part of ongoing maintenance of the Parkway. Several oak trees occur within the immediate vicinity of the site but will not be impacted. Laguna Creek occurs approximately 200-feet north of the site. A potential vernal pool was observed approximately 100-feet north of the site.

Wildlife Species Observed:

Northern mockingbird (*Mimus polyglottos*)
western scrub jay (*Aphelocoma californica californica*)
California towhee (*Pipilo crissalis*)
Western bluebird (*Sialia mexicana*)
Mourning dove (*Zenaida macroura*)
Acorn woodpecker (*Melanerpes formicivorus*)
California quail (*Callipepla californica*)
lesser goldfinch (*Carduelis psaltrina*)

Plant Species Observed:

Oak trees (*Quercus* sp.)
Willow tree (*Salix* sp.)
slender wild oats (*Avena barbata*)
brome grass (*Bromus* sp.)
Himalayan blackberry (*Rubus armeniacus*)
Black walnut
shortpod mustard (*Hirschfeldia incana*)
eucalyptus tree (*Eucalyptus* sp.)
Peruvian peppertree (*Schinus molle*)
pine tree (*Pinus* sp.)



View of project site facing east.



View of project site facing north.



View of project site facing west.



View of project site facing south.



View of potential vernal pool approximately 100-feet north of the site.



View of project site facing southwest.



View of proposed utility line trench route and access road facing southwest.



View of proposed utility line trench route and access road facing southwest.



View of proposed utility line trench route and access road facing northeast.



View of proposed utility line trench route and access road facing west.



View of proposed utility line trench route and access road facing east.



View of proposed utility line trench route and access road facing north.



View from the project site facing west.



View from the project site facing south.



View from the project site facing east.



View from the project site facing north.

Appendix B: Tree Exhibit and Tree Table



Environmental Assessment Specialists, Inc.

Office (318) 898-4866 Fax (318) 365-3553 www.easenv.com

July 10, 2024

AT&T Mobility, LLC
1452 Edinger Avenue, 3rd Floor
Tustin, CA 92780

Subject: Tree Exhibit and Tree Table
AT&T Mobility, LLC Telecommunication Facility No. CML02685 (Laguna Creek Trailhead)
Vineyard Road, Sacramento County, California

PROJECT SITE LOCATION AND DESCRIPTION

The project site is generally located north of State Route 104, south of State Route 16, east of State Route 99, and west of State Route 124, and is depicted on the Elk Grove, California, United States Geological Survey (USGS) 7.5-minute topographic quadrangle map. The site is specifically located within the Laguna Creek Parkway, east of the intersection of Vineyard Road and Crystal Creek Drive, Sacramento, CA.

AT&T proposes the installation of a new unmanned telecommunications facility at this location. Proposed is the installation of a new AT&T 80-foot-tall faux water tank with antennas and associated equipment within a 38-foot by 22-foot lease area surrounded by a 8-foot high block wall. Utility line trenching will travel approximately 560-feet southwest from the lease area to Vineyard Road and the existing utility sources. A new 15-foot-wide access road will be installed to provide access to the site from Vineyard Road.

TREE TABLE

The following table and tree exhibit show the locations and species of the trees located within the vicinity of the proposed impact area that are 6 inches in diameter at breast height (dbh) or larger. No trees are proposed for removal and the trees associated drip lines will be avoided.

Tree #	Tree Species	DBH
Tree # 1:	eucalyptus tree (<i>Eucalyptus</i> sp)	83"
Tree # 2:	blue oak (<i>Quercus douglasii</i>)	49"
Tree # 3:	valley oak (<i>Quercus lobata</i>)	24"
Tree # 4:	valley oak (<i>Quercus lobata</i>)	53"
Tree # 5:	valley oak (<i>Quercus lobata</i>)	8"
Tree # 6:	valley oak (<i>Quercus lobata</i>)	32"
Tree # 7:	valley oak (<i>Quercus lobata</i>)	36"
Tree # 8:	valley oak (<i>Quercus lobata</i>)	64"
Tree # 9:	valley oak (<i>Quercus lobata</i>)	18"
Tree # 10:	valley oak (<i>Quercus lobata</i>)	73"
Tree # 11:	valley oak (<i>Quercus lobata</i>)	64"
Tree # 12:	interior live oak (<i>Quercus wislizeni</i>)	68"
Tree # 13:	interior live oak (<i>Quercus wislizeni</i>)	27"
Tree # 14:	interior live oak (<i>Quercus wislizeni</i>)	23"
Tree # 15:	interior live oak (<i>Quercus wislizeni</i>)	30"

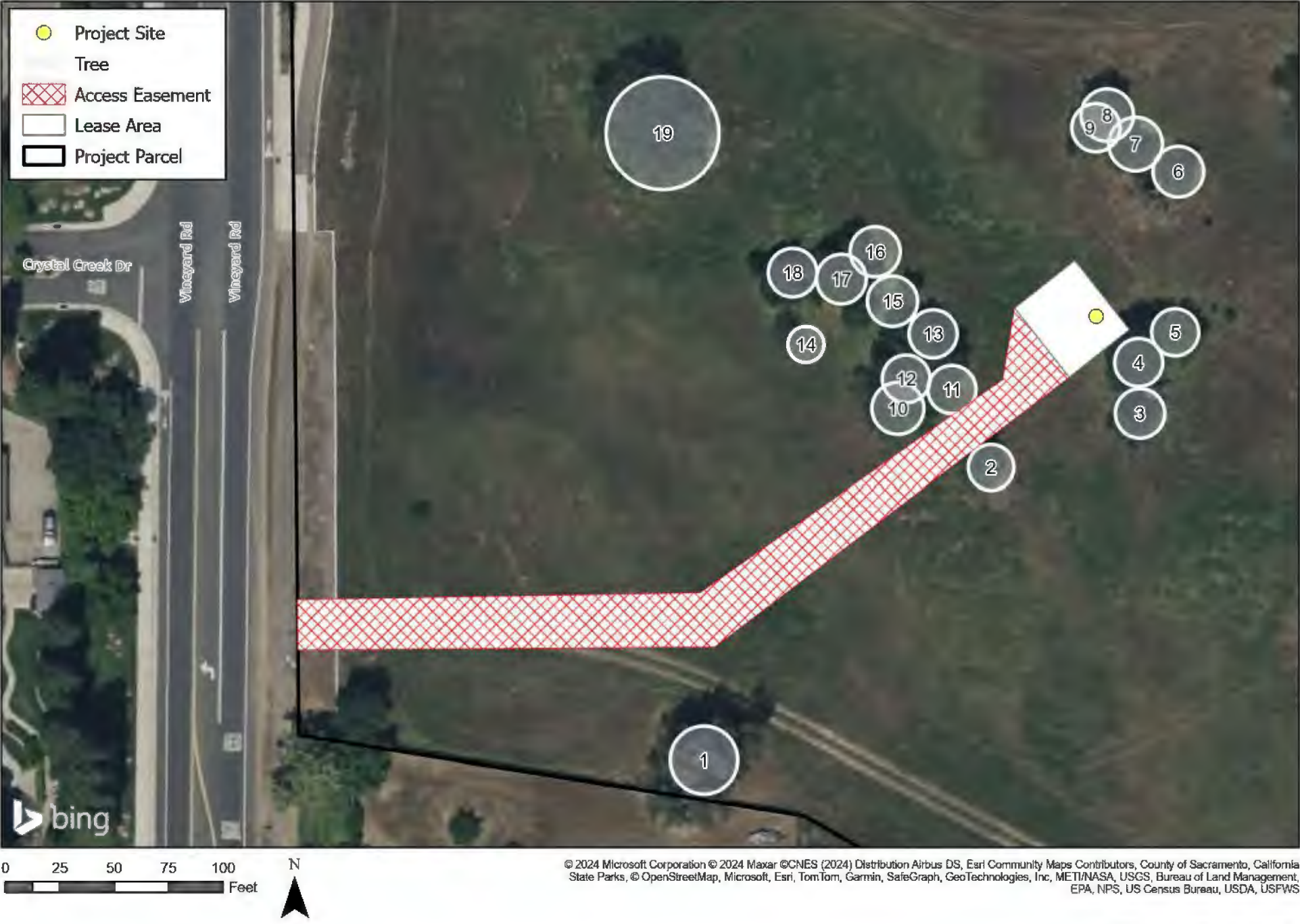
Tree # 16:	interior live oak (<i>Quercus wislizeni</i>)	40"
Tree # 17:	interior live oak (<i>Quercus wislizeni</i>)	36"
Tree # 18:	interior live oak (<i>Quercus wislizeni</i>)	70"
Tree # 19:	valley oak (<i>Quercus lobata</i>)	145"

We at EAS appreciate the opportunity to assist you on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Workman', written in a cursive style.

Kyle Workman
Project Ecologist



Tree Exhibit

Figure 3

KYLE D. WORKMAN, BIOLOGIST

OVERVIEW

- Bachelor's degree Environmental Science and Ecology – Western State College of Colorado

Kyle Workman is a project biologist with range of project experience in the environmental field. Mr. Workman has inventoried plants and wildlife and has conducted biological assessments and restoration monitoring surveys for various projects throughout the western United States and Hawaii. He has experience in water quality analysis, nest search techniques, habitat analyses, and has conducted research on aquatic insects.

RELATED EXPERIENCE

NEPA Compliance/Telecommunication Facilities. Assisting a variety of telecommunication providers throughout Arizona, California, Hawaii, Idaho, Nevada, New Mexico, Oregon, Utah and Washington in complying with the National Environmental Policy Act (NEPA) for the implementation of cellular communication facilities. This project includes the preparation of NEPA compliance documents in accordance with the Federal Communication Commissions regulations pertaining to telecommunication facilities, in particular, biological surveys, including focused sensitive species surveys and wetland delineations and permitting, construction monitoring, and arborist surveys. Reports are prepared associated with field surveys, reviews and project compliance include biological resources assessment reports, nesting bird survey letters, and focused plant and wildlife survey reports. Regularly prepare budgets and scopes of work for clients.

Section 7 consultations. Routinely conduct informal and formal section 7 consultation for proposed projects located within USFWS designated Critical Habitat. Work has involved effects analyses of projects, appropriate mitigation measures, and concurrence letters. Consultation has resulted in the approval of numerous projects located within Critical Habitat for sensitive species, which include California red-legged frog, Alameda whipsnake, California gnatcatcher, desert tortoise, and delta smelt.

Biological Resources Impact Analysis. Conducted biological assessments for various clients in Southern California. Field surveys involved inventorying plant and wildlife species, vegetation mapping, sensitive species habitat assessments, and jurisdictional drainage feature evaluations. Biological Resources Survey Reports are prepared to discuss the findings of the biological assessments.

Western Riverside County Multiple Habitat Conservation Plan (MSHCP) Consistency Analysis. Conducted habitat assessments throughout Riverside County, CA, with particular emphasis on sensitive plant and wildlife species including burrowing owl, least Bell's vireo, San Miguel savory, and many-stemmed dudleya. Field surveys and reports also include Riverine/Riparian analysis and urban/wildlands interface analysis as described by the MSHCP. Prepared various reports including MSHCP Consistency Analysis Reports, focused survey reports for burrowing owl, least Bell's vireo, and San Miguel savory, and Determination of Biological Equivalency or Superior Preservation Reports.

Habitat Restoration, Enhancement, and Conservation. Assisted numerous clients in management and monitoring of multiple restoration projects. Responsibilities have included inventorying native and non-native plant species, conducting monthly, quarterly, and annual monitoring surveys analyzing wildlife use, making recommendations for remedial measures necessary to achieve performance standards, and preparing various monitoring reports.

Biological Monitoring and Compliance. Assisted numerous clients throughout Southern California during all aspects of construction. This project included ongoing monitoring for compliance with USFWS, CDFG, and USACE rules and regulations for the project site and included erosion control monitoring and permit compliance. The assessment included monitoring all aspects of ground disturbing activity including tree removal, vegetation grubbing, and mass grading. The effort also involved inventorying plant and wildlife species. Has included leading weekly training sessions for construction personnel to inform them of biological issues.

Burrowing owl focused surveys. Conducted numerous focused surveys for burrowing owls for a variety of clients and projects in San Bernardino, Orange, and Riverside Counties. Surveys involved data collection on burrowing owl numbers, behavior, locations, occupied burrows, and sign. Coordinated a project that involved the passive relocation of burrowing owls and mitigation through the construction and monitoring of artificial burrows. The effort involved agency coordination, budgeting and scoping the work effort, organizing client meetings, and assigning work efforts to appropriate staff. Reports were prepared to document findings.

Desert tortoise focused surveys. Conducted numerous focused protocol surveys for desert tortoise for various projects in San Bernardino, Kern and Riverside Counties. Surveys involved data collection on suitable tortoise habitat, potential burrow locations and the documentation of findings in focused survey reports.

Least Bell's vireo focused surveys. Conducted numerous focused protocol surveys for least Bell's vireo for projects in Riverside County. Located numerous territories at various project sites and documented findings in focused surveyed reports.

PROFESSIONAL TRAINING

CNPS Vegetation and Habitat Rapid Assessment Workshop 8/05

Construction Storm Water Compliance Workshop 9/05

Desert Tortoise Handling Workshop and Certification 11/06

Basic Wetland Delineation Training - Portland State University 3/08