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January 13, 2026

VB BTS III, LLC
Mr. Brandon St. Michael
750 Park of Commerce Drive
Boca Raton, Florida 33487

Subject: Re: 2025 Botanical Survey for US-CA-7286 North Lakeport Telecommunications Facility, 5017 Terrace Avenue, Lakeport, Lake County, California 95453

Mr. St. Michael,

This letter addresses the findings of a Special-Status Plant Species Survey conducted by Trileaf Corporation (Trileaf) on a proposed VB BTS III, LLC candidate, US-CA-7286 North Lakeport, in Lake County, California. Additionally, this letter documents the extent of vegetation removal associated with the proposed telecommunications installation in Lakeport, California. Based on field reconnaissance conducted by a qualified biologist, vegetation removal would be limited to two shrubs and one manzanita tree within the proposed project footprint.

On December 2, 2025, feedback was received from CDFW regarding the presence of Konocti manzanita (*Arctostaphylos manzanita ssp. elegans*) within the subject parcel. The California Natural Diversity Database (CNDDB) record indicating the presence of Konocti manzanita (Arctostaphylos manzanita ssp. elegans), a CNPS Rank 1B.3 species, within the parcel associated with the proposed project is acknowledged. Focused botanical surveys were conducted by a qualified biologist during site visits in May and July and included pedestrian surveys of the proposed project footprint and adjacent areas containing potentially suitable habitat. No individuals of Konocti manzanita or other special-status plant species were observed during these surveys.

Although one survey occurred outside the peak blooming period, the May survey coincided with the latter portion of the documented blooming window (March through May), during which Konocti manzanita would be reasonably detectable. In addition to field surveys, a comprehensive records review was completed, including evaluation of the CNDDB occurrence data and publicly available community science databases (e.g., iNaturalist). Konocti manzanita is a perennial, evergreen shrub with a distinctive growth form that is generally detectable when present, including outside of peak flowering. In addition to field reconnaissance, available occurrence information was reviewed, including CNDDB data and publicly available community science databases (e.g., iNaturalist). While the CNDDB indicates an occurrence within the parcel, no additional observations were identified within or immediately adjacent to the proposed project footprint.

Given (1) the absence of observed individuals during multiple site visits, (2) the species' detectability due to its evergreen morphology, (3) the lack of corroborating occurrence data from additional sources, and (4) the disturbed nature and limited extent of suitable habitat within the project footprint, there is substantial evidence to support the conclusion that Konocti manzanita is not present within the area of ground disturbance. Therefore, implementation of the proposed telecommunications installation would not result in a significant impact to this species, and impacts to special-status plant species would be less than significant.

The manzanita tree proposed for removal was evaluated in the field and is not Konocti manzanita (Arctostaphylos manzanita ssp. elegans) or any other special-status plant species. No special-status plant species were observed within the area of vegetation removal. The affected vegetation occurs within a previously disturbed area associated with existing telecommunications infrastructure and routine site maintenance activities.

Vegetation removal would be confined to the minimum area necessary to implement the proposed project and would not result in the loss of sensitive natural communities or special-status plant habitat. Given the limited scope of removal, the disturbed site conditions, and the absence of special-status biological resources, the proposed vegetation removal would not result in a significant impact to biological resources.

If previously unidentified special-status plant species are encountered during construction, work would be halted in the immediate vicinity, and appropriate avoidance measures would be implemented to ensure compliance with applicable regulations and to avoid significant impacts.

This memorandum is provided to document existing biological conditions and to support the determination of a less-than-significant impact related to vegetation removal. As a precautionary measure, if Konocti manzanita is unexpectedly identified during construction, work will be avoided in the immediate vicinity of the plant(s), and the California Department of Fish and Wildlife will be consulted to determine appropriate avoidance measures. With implementation of these measures, any potential impacts would remain less than significant.

Sincerely,

Samantha Neary

Samantha Neary
Principal Biologist / Project Manager
Trileaf Corporation

Biological Resources Report

June 26, 2025

Revised January 13, 2026

US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, Lake County, California 95453
Trileaf # 762790

Prepared For:
VB BTS II, LLC
750 Park of Commerce Drive
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1. EXECUTIVE SUMMARY

This report contains the findings of a Biological Assessment conducted by Trileaf Corporation (Trileaf) on proposed VB BTS II, LLC candidate, US-CA-7286 North Lakeport, in Lake County, California. This project is being undertaken to provide improved telecommunications services to the local area through the installation of a new communication tower and associated equipment. The project site is located generally east of California State Route 29, and is depicted on the Lakeport, California U.S. Geological Survey (USGS) 7.5-minute topographic map. The scope of work consists of the installation of a stealth telecommunications tower and associated ground-based equipment.

The project site was surveyed on May 16, 2025 by Trileaf biologists, Ms. Samantha Neary and Ms. Rachel Bishop. 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 analysis of the potential impacts of the proposed undertaking on listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds. A project description, site photographs and topographical site location maps are included in this report.

On July 10, 2025, Trileaf biologists Ms. Rachel Bishop and Ms. Randi Honeycutt completed a follow-up visit to the site to survey for potential special-status plant species. Because the field survey was conducted in early May, within the typical blooming period for most but not all potentially occurring special-status plant species with potential to occur within the BSA area, a follow-up survey was required. Based on timing, methods, and extent of surveys, it is concluded that special-status plant species are absent from the project site and surrounding surveyed areas.

2. INTRODUCTION

This report contains the findings of a Biological Assessment conducted by Trileaf Corporation (Trileaf) on proposed VB BTS II, LLC candidate, US-CA-7286 North Lakeport, in Lake County, California. This project is being undertaken to provide improved telecommunications services to the local area through the installation of a new communication tower and associated equipment. The project site is located generally east of California State Route 29, and is depicted on the Lakeport, California U.S. Geological Survey (USGS) 7.5-minute topographic map. The proposed project consists of the installation of a 150-foot-tall monopine telecommunications tower (160-foot-tall overall, including proposed 10-foot-tall lightning rod) and associated ground equipment within a proposed 40-foot by 40-foot fenced lease area. A proposed 20-foot-wide access and utility easement, including a proposed 120-foot hammerhead fire turn-around, will extend generally east from the lease area for approximately 1,155 feet, terminating at South Terrace Avenue. The proposed project area is currently an undeveloped parcel dominated by naturally occurring grassland species and oak species in a rural residential area of Lakeport, California.

The purpose of this assessment is to document the biological resources on the property and identify potential impacts that could occur from the proposed project. This document has been prepared in accordance with the most recent guidelines provided by Lake County, legal requirements found in Section 7 (a)(2) of the Endangered Species Act (16 U.S. C 1536(c)), and is intended for use during future impact analysis that is required under the California Environmental Quality Act (CEQA). The document presents technical information upon which later decisions regarding project affects are developed.

EXISTING CONDITIONS

The project area is located in Section 31 of the Lakeport 7.5-minute topographic quadrangle; located within Township 15N and Range 9W. The project is to be located within a portion of undeveloped grassland at the approximate location of 5017 Terrace Avenue and is accessed from an existing dirt and gravel road that branches north off of Terrace Avenue. Including the access road, the potential project impacts are limited to the approximately 0.60-acre portion of the 53.53-acre property. The proposed Site is located at a latitude of 39.1034417 and a longitude of -122.906231 at an elevation of approximately 1,393.12 feet above mean sea level.

The project area is located within the North Coast Bioregion (Welsh 1994), a bioregion that encompasses the area from southwestern Oregon to southern Monterey County and contains the southern extent of the mixed hardwood forest with redwood. The North Coast Bioregion is delineated by the Pacific Ocean on the west and the Coast Ranges Mountains on the east and encompasses those lands west of the highest ridgeline dividing areas that drain directly into the Pacific Ocean from those areas that drain toward the interior. Habitats within this bioregion include both mesic (moist) habitats, such as freshwater marsh, and xeric (dry) habitats, such as chaparral, and are typical of a Mediterranean type climate. Average rainfall in the area is 40 inches (Welsh 1994).

For purposes of this report, the approximate 3.53-acre Biological Study Area (BSA) includes the entire 0.60-acre portion of the parcel to be impacted by the installation as well as the areas visible within 50-feet of the Site (Figure 3). Areas on adjacent parcels that lie adjacent to the work areas were surveyed visually from the subject public right-of-way. Impacts from the project would include the installation of the proposed tower and ground-based equipment within the approximately 1,600 square foot equipment lease area, as well as the installation of the

access/utilities easement within the existing dirt and gravel access driveway. Site maps illustrating site topography, project location, and the buffered survey area can be found in Appendix A.

3. REGULATORY FRAMEWORK

United States Fish and Wildlife Service

The United States Fish and Wildlife Service (USFWS) is responsible for enforcing the federal Endangered Species Act (ESA). This law protects species listed as threatened or endangered from "take," which includes both direct and indirect harm. Take is prohibited unless a Section 10 permit is issued to a non-federal entity or a Biological Opinion with incidental take authorization is issued to a federal agency through Section 7 consultation.

Under the ESA, agencies reviewing proposed projects within their jurisdiction must assess whether any federally listed species may be present in the project area and whether the proposed federal action could jeopardize the continued existence of those species. Habitat loss is specifically recognized as an adverse effect under the ESA. Additionally, the lead agency must evaluate whether its actions could jeopardize species proposed for listing or adversely affect proposed critical habitat. The USFWS also enforces the Migratory Bird Treaty Act of 1918, which makes it illegal to harm or destroy active nests, eggs, or young birds.

Clean Water Act (CWA)

The United States Army Corps of Engineers (USACE) is responsible for implementing the federal Clean Water Act (CWA). Under Section 404 of the CWA, prior authorization is required before placing dredged or fill material into waters of the United States. These waters include virtually all surface waters—such as navigable waters and their tributaries, interstate waters and their tributaries, wetlands adjacent to these waters, and any impoundments of such waters.

Wetlands are defined as areas where wetland vegetation is present and where soils are saturated for part of the growing season or where the surface is flooded during some portion of most years. Examples include seasonally inundated wetlands, swamps, marshes, bogs, and similar habitats.

At the state level, the State Water Resources Control Board (SWRCB) oversees implementation of the Clean Water Act in California. Under Section 401 of the CWA, any project seeking a USACE permit for discharge of dredged or fill material—including those qualifying for a Nationwide Permit—must obtain water quality certification from the appropriate Regional Water Quality Control Board (RWQCB) to ensure compliance with state water quality standards.

The SWRCB also administers the National Pollutant Discharge Elimination System (NPDES), which includes the General Permit for Storm Water Discharges from Construction Activities.

California Department of Fish & Game

The California Department of Fish and Wildlife (CDFW) is responsible for enforcing the California Endangered Species Act (CESA). The state's policy under CESA is to conserve, protect, restore, and enhance endangered and threatened species, along with their habitats. CDFW has jurisdiction over species formally listed as threatened or endangered under CESA, which offers broad protection to at-risk fish, wildlife, and plant species.

In addition to CESA, the California Native Plant Protection Act (NPPA) provides protections for rare and endangered plant species. CDFW also maintains a list of “Species of Special Concern,” which must be considered during environmental review under the California Environmental Quality Act (CEQA). Under CESA, when a state or local agency evaluates a

proposed project, it must determine whether any state-listed species are likely to be present in the project area and assess whether the project could significantly impact those species. If such impacts are identified, the lead agency must adopt reasonable and prudent alternatives, as specified by CDFW, to avoid or mitigate those effects.

CDFW may authorize the take of a state-listed species either through recognition of an incidental take permit issued under the federal Endangered Species Act (ESA), or through a permit issued under Section 2080 of the Fish and Game Code, provided the impacts are adequately minimized and mitigated.

Additionally, CDFW enforces provisions of the California Fish and Game Code. Section 3503.5 makes it illegal to take, possess, or destroy birds of prey—including those in the Falconiformes (e.g., hawks, eagles, falcons, vultures) and Strigiformes (owls) families. This protection extends to nest disturbance resulting from construction or other activities.

California Native Plant Society

The California Native Plant Society (CNPS) is a non-profit organization focused on the preservation of California's native plant species. CNPS has developed a ranking system for plants of conservation concern, formerly known as the "CNPS List," which was renamed in 2011 to the California Rare Plant Rank (CRPR). While the name has changed, the ranking definitions and system remain the same and reflect varying levels of conservation concern:

CRPR 1A – Presumed Extinct in California

Plants in this category have not been observed or collected in the wild in California for many years and are considered either extinct (no longer occurring anywhere) or extirpated (eliminated from California but still present elsewhere). These plants meet the definitions under Section 1901 (Native Plant Protection Act) or Sections 2062 and 2067 (California Endangered Species Act) of the California Fish and Game Code and are eligible for state listing. If rediscovered, these taxa must be fully considered during CEQA environmental review.

CRPR 1B – Rare and Endangered in California and Elsewhere

These plants are rare, threatened, or endangered throughout their entire range, with most being endemic to California. Many have experienced substantial population declines over the past century. Like CRPR 1A plants, they meet legal definitions for protection and are eligible for state listing. They must be fully considered in CEQA-related environmental documentation.

CRPR 2 – Rare in California but Common Elsewhere

Plants in this category would otherwise qualify for CRPR 1B, except they are more common outside California. While these species may not be eligible for protection under the federal Endangered Species Act, California law (since 1979) considers them for state protection. CRPR 2 species help preserve regional biodiversity and genetic variation, and they are eligible for state listing. They must be considered during CEQA environmental review.

CRPR 3 – Plants of Uncertain Status

CRPR 3 includes plants for which there is insufficient information to assign a definitive rank. Most are taxonomically uncertain or poorly studied. CNPS encourages researchers to submit data on distribution, threats, ecology, and taxonomy. Some may qualify for protection under state law and should be evaluated during CEQA review.

CRPR 4 – Plants of Limited Distribution

These plants are not rare from a statewide perspective but are infrequent or locally distributed. Although few qualify for listing under the Native Plant Protection Act or the California Endangered Species Act, they may still be of regional significance. CNPS recommends monitoring and evaluation of CRPR 4 species during CEQA review, especially if their status appears to be changing.

Local Regulations, Lake County Regulations

In unincorporated areas of Lake County, Blue Oak (*Quercus douglasii*) and Coast Live Oak (*Quercus agrifolia*) are not specifically protected under a countywide tree ordinance, and there are no permit requirements for their removal. While Lake County has adopted an Oak Woodland Management Policy (Board Resolution No. 95-211) to encourage voluntary conservation of oak woodlands, this policy does not impose regulatory restrictions or mandatory mitigation for tree removal. However, within incorporated areas such as the City of Clearlake, native oak trees—including Blue Oak and Coast Live Oak—are protected under the municipal code, which requires a permit for the removal of any oak tree with a trunk diameter of six inches or more measured at three feet above grade (Clearlake Municipal Code §18-40.020).

4. METHODOLOGY

This review used the best available scientific and commercial data to evaluate the potential effects to biological resources from the proposed project. Methods to obtain data and biological resources information included a desktop review and field survey of the Biological Survey Area (BSA), which covered the project boundary and an approximate 50-foot buffer, with a focus on the proposed Site.

Desktop Review

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. Document and digital data review included information from federal, state, and local resource agencies, including the National Wetland Inventory (NWI), California Natural Diversity Database (CNDDB), California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants, the California Department of Fish and Wildlife (CDFW) Special Animals List, biological reports for nearby projects, and the U.S. Fish & Wildlife Service (USFWS) Information for Planning and Consultation (IPaC).

Additional resources reviewed for information about the area of impact:

- Aerial photographs of the project area and general project vicinity.
- Lakeport USGS 7.5-minute topographic quadrangle.
- USDA Web Soil Survey mapping tool.
- USFWS Critical Habitat Mapper.
- US Geological Survey National Hydrography Dataset; and,
- USFWS National Wetlands Inventory.

An initial review indicated that the project site is located within an undeveloped parcel dominated by naturally-occurring grassland species and oak species in a rural residential area of Lakeport, California. Ms. Samantha Neary and Ms. Rachel Bishop 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.

Field Surveys

Trileaf biologists, Ms. Samantha Neary and Ms. Rachel Bishop, visited and surveyed the site on May 16, 2025. The field survey focused on existing biological resources, presence or absence of special-status wildlife and plant species and habitats, as well as the proposed potential of the present habitat to support these species. On-site field survey methods consisted of walking randomized transects throughout the project and recording wildlife observed by visual observation using binoculars, indirect signs (e.g. scat, animal tracks, burrows, and skeletal remains), and

auditory cues (i.e. calls and songs). Notes on vegetation communities and botanical resources were also recorded. The field survey was conducted in early May, within the typical blooming period for most but not all potentially occurring special-status plant species with potential to occur within the BSA area. Trileaf completed a special-status plant survey as well as assessed the site for potential wetlands. Both surveys have been written up as separate reports.

Sensitive biological resources present, or potentially present, onsite were identified through a literature review using the following resources: the U.S. Fish and Wildlife Service's Information, Planning, and Consultation system (IPaC), the California Natural Diversity Data Base (CNDDB), and the California Native Plant Society (Tibor 2001 and CNPSEI 2010). 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, or candidate species.

5. FINDINGS

5.1 Environmental Setting / Site Description

The biological assessment survey of the project site was conducted on May 16, 2025. Weather conditions included a temperature of approximately 78 degrees Fahrenheit, winds of 1 to 3 miles per hour, and clear skies. The Site is located at 5017 Terrace Avenue, Lakeport, Lake County, California 95453, and consists of the installation of a 150-foot-tall monopine telecommunications tower (160-foot-tall overall, including proposed 10-foot-tall lightning rod) telecommunications tower and associated ground equipment within a proposed 40-foot by 40-foot fenced lease area. A proposed 20-foot-wide access and utility easement, including a proposed 120-foot hammerhead fire turn-around, will extend generally east from the lease area for approximately 1,155 feet, terminating at South Terrace Avenue. The proposed project area is currently an undeveloped parcel dominated by naturally occurring grassland species and oak species in a rural residential area of Lakeport, California. The proposed tower site is approximately 1,393.12 feet above mean sea level. Previous disturbances on the site include the grading of the existing dirt and gravel access road, as well as construction of a shed north of the access road. An unnamed seasonal riverine habitat runs through the southern portion of the access road.

The surrounding habitat within a 1.0-mile radius of the proposed site consists predominantly of rural residential development. To the north is a Sutter Lakeside Hospital and associated development, followed by light residential development and *Quercus spp.*-dominated forest. To the east is rural residential development followed by Clear Lake. To the south is *Quercus spp.*-dominated forest with light residential development. To the west is *Quercus spp.*-dominated forest, followed by CA SR-29, followed by Lake County Jail and Animal Control.

Overall, the proposed project area is relatively flat near the proposed lease area, with a general down slope southeast along the proposed access easement. No ponded surface water was observed at the time of the site survey. The Site is currently located within an undeveloped portion of the parent parcel dominated by grassland spp. and *Quercus spp*. Photographs of the project area are included in Appendix B.

5.2 Vegetation

The proposed project footprint is dominated by grass species, including but not limited to: Greater quaking grass (*Briza maxima*), Silver hairgrass (*Aira caryophyllea*), Graceful bedstraw (*Galium porrigens*), Slender wild oat (*Avena barbata*), and Little quaking grass (*Briza minor*). Additional plant species observed within the tower/equipment area and buffer include but were not limited to: wild carrot (*Daucus carota*), Miniature lupine (*Lupinus bicolor*), Spanish clover (*Acmispon americanus*), Silver hairgrass (*Aira caryophyllea*), California saxifrage (*Saxifraga californica*), Valley tassels (Castilleja attenuata), Hairy vetch (*Vicia villosa*), Grassy tarweed (*Madia gracilis*), and Lesser hop trefoil (*Trifolium dubium*). Blue oak (*Quercus douglasii*) and Coast live oak (*Quercus agrifolia*) dominate the canopy-forming species within the project area. Vegetation removal associated with the proposed project is limited in extent and is documented in a memorandum which, along with a complete list of plant species observed on site, can be found in Appendix A.

5.2.1 Coast Live Oak and Blue Oak Woodland

Coast live oak and blue oak woodland (*Quercus agrifolia* Woodland Alliance; *Quercus douglasii* Woodland Alliance) typically occurs primarily on dry foothills, slopes, ridges, and valleys of the Sierra Nevada, Coast Ranges, and Cascade foothills. This community is characterized by a tree canopy where coast live oak is dominant or co-dominant. The canopy ranges from open to continuous, while the shrub layer is sparse to patchy, and the herbaceous layer is generally sparse (Sawyer *et al.*, 2009). This woodland provides significant ecological value by offering high-quality foraging habitat and protective cover for a variety of wildlife species, particularly through acorn production and the presence of forest canopy.

During the May and July 2025 field surveys, this vegetation alliance was documented throughout the surveyed area. Blue oak (*Quercus douglasii*) was the dominant canopy species with dense coverage, with Coast live oak (*Quercus agrifolia*) associated throughout. Associated tree and shrub species included black elderberry (*Sambucus nigra*), manzanita ssp., and toyon (*Heteromeles arbutifolia*). The understory was sparsely to moderately populated with patches of annual grasses.

5.2.2 Konocti Manzanita (*Arctostaphylos manzanita ssp. elegans*)

Konocti manzanita (*Arctostaphylos manzanita ssp. elegans*) is a perennial evergreen shrub endemic to Lake County, California, and is restricted to the volcanic slopes surrounding Mount Konocti. This species occurs within chaparral and mixed woodland communities, typically on rocky, well-drained serpentine or volcanic soils, at elevations between approximately 500 and 1,500 meters. Konocti manzanita is characterized by reddish bark, rigid branches, and leathery green leaves, with clusters of urn-shaped white to pink flowers that bloom from January to March, followed by reddish-brown fruit.

Suitable habitat for Konocti manzanita (*Arctostaphylos manzanita ssp. elegans*) was present within portions of the project site, particularly in the woodland areas directly west of the proposed lease area. This species is considered a special-status plant with a California Rare Plant Rank (CRPR) of 1B.3, indicating it is rare, threatened, or endangered in California and elsewhere, and is considered sensitive under the California Environmental Quality Act (CEQA). While it is not listed under the federal or state Endangered Species Acts, the species' limited distribution makes it vulnerable to habitat loss, fragmentation, and disturbance.

According to the California Natural Diversity Database (CNDDB), historical occurrences of manzanita (*Arctostaphylos manzanita* spp. *elegans*) have been documented on the western portion of the parcel. However, no individuals of this species were observed during the May 2025 site walk. Konocti manzanita is a perennial, evergreen shrub with a distinctive growth form that is identifiable outside of peak flowering when present. In addition to field reconnaissance, a records review was completed using the CNDDB and publicly available community science databases (e.g., iNaturalist). While the CNDDB identifies an occurrence within the parcel, no corroborating observations were identified within or immediately adjacent to the proposed project footprint from other available data sources. While on site the landowner informed Ms. Neary that he regularly trims and burns entire manzanita plants on the parcel. It is possible that the species is no longer present due to habitat alteration, natural succession, or other environmental factors. As a result, manzanita is not expected to occur within the project site at this time.

CDFW (2018) recognizes that survey effort should be commensurate with the likelihood of occurrence and potential for impact. Given the absence of detections during focused field reconnaissance conducted during appropriate portions of the growing season, the species' detectability, the lack of corroborating occurrence data, and the disturbed nature of the project area, additional protocol-level botanical surveys are not warranted. Based on the available substantial evidence, implementation of the proposed project would result in a less-than-significant impact to special-status plant species.

As a precautionary measure, if Konocti manzanita is unexpectedly encountered during construction, work will avoid the immediate vicinity of the plant(s), and appropriate avoidance measures will be implemented to ensure impacts remain less than significant.

5.2.3 Grassland Suncup (*Taraxia ovata*)

Grassland suncup is an annual or short-lived perennial herb in the evening primrose family (Onagraceae) endemic to California. This species is typically found in open grasslands, valley and foothill grasslands, and sometimes in coastal prairie or open woodland habitats, generally at elevations ranging from near sea level to approximately 1,000 meters. Grassland suncup grows in well-drained soils, often on gentle slopes, flats, or disturbed areas within its habitat range.

No individuals of this species were observed during the survey effort, and suitable habitat within the project footprint was found to be limited and/or marginal in quality. Therefore, this species is presumed absent from the project site.

5.3 Soils

According to the U.S. Soil Conservation Service Soil Survey of Lake County, California, the Site is underlain by Manzanita gravelly loam, 8 to 25 percent slopes. Manzanita soils consist of somewhat well drained soils that are formed from alluvium and are found in the backslopes and tread of terraces. The depth to the most restrictive feature is more than 80 inches. The depth to the water table is more than 80 inches. A typical profile of Manzanita soils consists of a surface layer of gravelly loam extending 0 to 7 inches, followed by a subsurface layer of gravelly sandy clay loam extending 7 to 35 inches, and a layer of gravelly clay extending 35 to 60 inches. Manzanita soils never flood or pond. Minor components observed on site include: Forbesville and Steeper slope, neither of which are considered hydric soils. Manzanita gravelly loam, 8 to 25 percent slopes are not considered a hydric soil, and no hydrophytic vegetation or surface water was observed within the surveyed project area and buffer.

5.4 General Wildlife

The site offers limited but suitable habitat for various wildlife species. The grassland provides marginal quality habitat for small- to medium-sized mammals and reptiles, supporting foraging, shelter, and breeding activities. The riverine habitats adjacent to the project area serve as a temporary water source for wading birds, reptiles, and amphibians. No burrows were observed within the project site.

Wildlife observed during field surveys included Lesser goldfinch (*Carduelis psaltrina*), House sparrow (*Passer domesticus*), Mourning dove (*Zenaida macroura*), House finch (*Carpodacus mexicanus*), Common raven (*Corvus corax*), European starling (*Sturnus vulgaris*),

Turkey Vulture (*Cathartes aura*), California ground squirrel (*Spermophilus beecheyi*), Black-tailed jackrabbit (*Lepus californicus*), Black-tailed deer (*Odocoileus hemionus columbianus*). A full list of species observed during site reconnaissance can be found in Appendix A.

Although no active bird nests were observed during surveys, the site contains appropriate habitat for both ground- and tree-nesting bird species, as well as foraging habitat for a variety of birds. It is reasonably likely that native birds use the site for nesting. Tree removal and site development could potentially disturb active nests if present during construction.

5.5 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.

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. For the purposes of this Biological Resources Assessment, special-status species include those that are federally listed as Endangered, Threatened or Proposed for federal listing (candidate) under the USFWS. Other species also evaluated in this Biological Assessment include non-listed federal and California Special Species of Concern (CSC) and those species that fall under the jurisdiction of the USFWS such as the Migratory Bird Treaty Act (MBTA) and the CDFW, such as CEQA Section 15380(d). Impacts to special-status species were assessed if: (1) those species occurred in habitats similar to those of the project sites and buffer areas, and (2) were known to occur within the general vicinity of the proposed project sites.

5.5.1 Avian Species

The osprey is a large, fish-eating raptor with a nearly global distribution, commonly associated with large bodies of water, including rivers, lakes, reservoirs, estuaries, and coastal habitats. In California, osprey occur primarily in forested regions near water bodies but are also found in lower elevations, including inland lakes, reservoirs, and large rivers, particularly during the breeding season. Osprey are not listed under the federal or California Endangered Species Acts but are considered a fully protected species under California Fish and Game Code (§3511) and are a California Species of Special Concern during the breeding season. The species is also protected under the Migratory Bird Treaty Act (MBTA). No osprey individuals or potential nesting material was observed during the May 2025 site walk. Given the distance from the nearest substantial water body capable of supporting the species, this scope of work is not anticipated to affect this species.

The tricolored blackbird is a colonial-nesting passerine endemic to California and small portions of adjacent Oregon, Nevada, and Baja California. This species is closely associated with dense vegetation near open water, including freshwater marshes, wetland edges, irrigated agricultural fields (such as silage crops), and occasionally upland habitats like blackberry brambles or thickets of willows and other shrubs. Nesting colonies require dense, protective vegetation for nest placement, coupled with nearby foraging habitat consisting of grasslands, agricultural lands, and open fields. This species is listed as *Threatened* under the California Endangered Species Act (CESA) and is designated as a California Species of Special Concern. It is also protected under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Although no active tricolored blackbird colonies were observed within the project footprint during the biological survey, suitable nesting habitat occurs within the buffer surrounding the project area.

5.6 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.

5.6.1 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 Tower	Distance from Tower
Riverine	Unnamed	SE	0.14 miles
Riverine and Associated Wetland Habitat	Lyons Creek	NE	0.35+ miles
Forested Wetland	Associated with Clear Lake	SE	0.38 miles
Freshwater Emergent Wetland	Associated with Clear Lake	E	0.44 miles
Lake	Clear Lake	E	0.5 miles

A seasonal riverine feature transects the southern leg of the existing gravel access road and is currently conveyed through an existing culvert. This feature presents as a shallow, linear topographic depression with an undefined bed and banks. At the time of the biological survey, the feature was dry and exhibited no evidence of recent or historic surface flow, such as sediment scour, debris wrack, or water staining. However, the presence of facultative wetland plant species within the feature indicates that it experiences periodic soil moisture or saturation, likely associated with seasonal stormwater runoff events.

While no clear indicators of ordinary high-water marks were present, the feature likely functions as a seasonal drainage or ephemeral swale, conveying stormwater flows during periods of heavy precipitation. The existing culvert allows surface flow to pass beneath the current roadway alignment during those events. The feature may fall under the jurisdiction of the California Department of Fish and Wildlife (CDFW) as a streambed pursuant to Fish and Game Code Section 1602 and may also qualify as a water of the state regulated by the Regional Water Quality Control Board (RWQCB) under the Porter-Cologne Water Quality Control Act. Its jurisdictional status under the Clean Water Act (Section 404) is not applicable under current guidance from the Army Corps of Engineers.

5.6.2 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 lease area and easements would have an impact on any wetlands or require significant amounts of fill or grading. A formal wetland delineation was conducted within and adjacent to the onsite stream channel to determine the presence and extent of jurisdictional wetlands and waters subject to regulation under Section 404 of the Clean Water Act and Section 401 of the Clean Water Act, as well as applicable state and local regulations. Although the stream itself exhibited characteristics of an intermittent drainage feature, areas along its margins were evaluated for indicators of hydrophytic vegetation,

hydric soils, and wetland hydrology. The delineation was performed in accordance with the U.S. Army Corps of Engineers' 1987 Wetland Delineation Manual and the appropriate Regional Supplement.

The results of the delineation concluded that no wetlands are present within or adjacent to the stream or in the surrounding areas of the project site. No evidence of hydrophytic vegetation, hydric soils, or wetland hydrology was observed during the field assessment. As such, the site does not support jurisdictional wetlands, and no permitting for wetland impacts is anticipated at this time.

5.6.3 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 not located within a principal migratory bird flyway and no nests or nesting activity were observed during the biological assessment field survey. The trees and shrubs located within the immediate vicinity of the project site provide suitable avian nesting habitat. Additionally, although not considered natural nesting habitat, telecommunication towers are known to provide suitable nest sites for raptors and other avian species.

6. SENSITIVE BIOLOGICAL RESOURCES IMPACT ANALYSIS

On May 16, 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 and/or endangered species (photographs of the project area are included in Appendix B). The lease area is not located within an aquatic environment; therefore, any obligate aquatic species should not be directly impacted by this project and were not included in Trileaf's assessment. Please refer to Appendix A for a list of these species and their habitat requirements.

Suitable habitat for sensitive wildlife species is present within the surveyed buffer surrounding the proposed development footprint; however, none are likely to occur within the proposed development footprint itself. No small mammal burrows were observed on or within the immediate vicinity of the site. No direct impacts are anticipated to any sensitive wildlife species or their habitat, and no further action is recommended regarding sensitive wildlife species.

On July 10, 2025, Trileaf biologists Ms. Rachel Bishop and Ms. Randi Honeycutt completed a follow-up visit to the site to survey for potential special-status plant species. Because the field survey was conducted in early May, within the typical blooming period for most but not all potentially occurring special-status plant species with potential to occur within the BSA area, a follow-up survey was required. Based on timing, methods, and extent of surveys, it is concluded that special-status plant species are absent from the project site and surrounding surveyed areas.

6.1 Significance Criteria

The determination of significance of impacts to biological resources involves an evaluation of the context in which the impact may occur and the intensity and extent of the impact's effect. The significance of potential impacts is assessed at a site-specific scale and in the larger regional context. The project's effect on biological resources would be considered significant if the project results in:

1. Alteration of unique characteristics of the area, such as sensitive plant communities and habitats (i.e. serpentine habitats, wetlands, riparian habitats).
2. Adverse impacts to special-status species
3. Adverse impacts to important or vulnerable resources as determined by scientific opinion or resource agency concerns (i.e. special status habitats; e.g. wetlands).
4. Interference with migratory routes.

6.2 Potential Impacts

- **Sensitive Plant Species:** The project site contains suitable habitat for sensitive plant species. However, no special-status plant species were observed within or surrounding the proposed project site during either site survey. Based on timing, methods, and extent of surveys, it is concluded that special-status plant species are absent from the project site and surrounding surveyed areas.
- **Sensitive Wildlife Species:** Suitable habitat for sensitive wildlife species is present within the surveyed buffer surrounding the proposed development footprint, however, none are likely to occur within the proposed development footprint itself. No small mammal

burrows were observed on or within the immediate vicinity of the site. No direct impacts are anticipated to any sensitive wildlife species or their habitat, and no further action is recommended regarding sensitive wildlife species.

- **Nesting Birds:** The trees and shrubs located within the immediate vicinity of the project site provide suitable nesting habitat for several avian species. Therefore, MBA recommends that construction activity avoid the avian nesting season (February - August). 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 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 will 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.

7. CONSTRUCTION BEST MANAGEMENT PRACTICES

- **Work Timing:** All work activities shall be completed during daylight hours (between sunrise and sunset) and outside of rain events.
- **Work Limits:** The proposed disturbance envelope shall be clearly marked or delineated with stakes, flagging, tape, or signage prior to work. Areas outside of work limits should be considered environmentally sensitive and should not be disturbed.
- **Vehicles and Equipment:** All equipment and vehicles shall be checked and maintained daily to prevent spills of fuel, oil, and other hazardous materials. A designated staging area shall be established for vehicle/equipment parking and storage of fuel, lubricants, and solvents. All fueling and maintenance activities shall take place in the staging area.
- **Nesting Birds:** A qualified biologist shall perform a pre-construction survey for nesting birds within 7 days prior to breaking ground at the site if construction activities take place between February 1 and August 31. If nesting birds are found, the qualified biologist should establish suitable buffers prior to groundbreaking activities. To prevent encroachment, the established buffer(s) should be clearly marked by highly visibility material. The established buffer(s) should remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist.

  Alternatively, depending on site-specific conditions for each nest and the proximity and nature of construction activities, it may be possible for work to proceed within the established buffer without affecting the nesting effort. This determination will be made on a case-by-case basis by a qualified biologist. If construction within the buffer is permitted, the nest(s) will be continuously monitored by the biologist during all work activities within the buffer zone. The biologist will conduct full-time monitoring to assess whether construction is causing disturbance to the nest or nesting behavior. If any signs of nest disturbance or adverse impacts are observed, the biologist will immediately notify the construction manager to halt all work within the buffer. Work will not resume until the nest is no longer active or the young have successfully fledged. For active raptor nests, the Project proponent must notify the California Department of Fish and Wildlife (CDFW) to consult on whether work can proceed within the standard 500-foot (or greater) buffer. Construction within the buffer of an active raptor nest may only proceed with explicit approval from CDFW.
- **Aquatic Resources:** The proposed scope of work includes widening of the existing access road that crosses a seasonal riverine. To avoid and minimize potential impacts to the seasonal stream and associated aquatic resources during road widening activities, the following best management practices (BMPs) shall be implemented:
  - **Seasonal Work Window –** All work within or adjacent to the stream, including work on or around the culvert, shall occur during the dry season (typically June 15 to October 15) when no flowing water is present, unless otherwise approved by the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB).
  - **Establishment of Work Limits and Protection of Riparian Areas –** The limits of construction shall be clearly demarcated with high-visibility fencing (e.g., ESA fencing) to restrict equipment, personnel, and materials to designated work areas

and avoid unnecessary disturbance to the streambed, banks, and adjacent riparian vegetation.

- **Erosion and Sediment Control Measures –** Temporary erosion and sediment control measures shall be installed prior to the onset of construction and maintained throughout the construction period. These measures may include, but are not limited to, silt fencing, straw wattles, fiber rolls, and sediment basins. Soil stockpiles shall be covered and surrounded by appropriate sediment controls and located at least 50 feet from the stream.
- **Culvert Protection and Channel Stabilization -** The existing culvert shall be protected from damage during construction. If the road widening results in modifications to the culvert inlet or outlet, appropriate stabilization measures such as rock slope protection (riprap) or energy dissipators shall be installed to prevent scour or erosion.
- **Pollution Prevention –** All construction equipment shall be maintained in good condition to prevent leaks. Equipment refueling, maintenance, and storage shall occur at least 100 feet away from the stream. Spill prevention and response materials shall be maintained on site at all times. Concrete washout areas shall be sited away from the stream and fully contained.
- **Post-Construction Stabilization and Restoration –** Upon completion of construction, all disturbed soils adjacent to the stream shall be stabilized using erosion control measures such as native seed, mulch, erosion control fabric, or other appropriate methods. Any temporarily impacted riparian vegetation shall be restored using locally appropriate native species.
- **Monitoring and Maintenance –** Erosion control measures shall be inspected regularly during construction and after major storm events. Repairs or reinforcements shall be made promptly if measures are damaged or ineffective.

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Appendix A

Tables and Figures

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Birds						
Northern Spotted Owl	*Strix occidentalis caurina*	Threatened	--	--	**None.** This species inhabits structurally complex, old-growth coniferous forests, particularly in areas with high canopy closure and a variety of tree species. High-quality spotted owl habitat includes a multilayered canopy, large overstory trees, shade-tolerant understory, moderate to high canopy closure, and the presence of snags and downed wood. The range-wide distribution includes British Columbia through the Cascade Range, coastal ranges, and intervening forested lands in Washington, Oregon, and northern California, as far south as Marin County. The southeastern boundary of its range is the Pit River area of Shasta County, California. Northern spotted owls are very territorial and intolerant of habitat disturbance.	**None**. No potential habitat suitable for this species was observed within the proposed project site or buffer area.

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Osprey	*Pandion haliaetus*	--	S4	--	**None.** This species is found in a wide range of habitats, primarily near water sources with abundant fish populations. They can be found near rivers, lakes, reservoirs, oceans, lagoons, coastal wetlands, estuaries, reefs, swamps, mangroves, and marshes. Ospreys build large, bulky nests, often on top of tall trees, rocky ledges, or even man-made structures like utility poles or nest platforms. They are known to reuse the same nests for many years.	**None**. No potential habitat suitable for this species was observed within the proposed project site or buffer area. The closest known occurrence of this species is 0.5-miles northeast of the proposed project area, and no indication of species presence was observed on site.
Tricolored Blackbird	*Agelaius tricolor*	--	Threatened	--	This species prefers wetland and grassland habitats. Prefer to forage in cultivated fields, feedlots, and wetlands; additionally will forage in agricultural fields with low-growing vegetation. Require a nearby water source, suitable nesting substrate, and a large, productive foraging landscape to breed.	**Potentially present.** This species may be present feeding in the general project buffer area, but is not likely to be found nesting as no nesting habitat is present. No individuals of this species were observed during surveys. This species has been documented approximately 0.58-miles northwest of the proposed project site; however, this species is not anticipated to be affected by the proposed scope of work (CDFW 2020).
Amphibians & Reptiles						

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Northwestern Pond Turtle	*Actinemys marmorata*	Proposed Threatened	--	--	This species primarily inhabits freshwater environments like ponds, lakes, streams, and rivers. They require both aquatic and terrestrial habitats for nesting, basking, and overwintering. Specific habitat features include deep pools, submerged logs or debris, undercut banks, and abundant aquatic vegetation.	**None.** Given the fact that the stream that cuts through the southern portion of the access road does not contain water year-round, permanent habitat is not present within the proposed project site or buffer area. No sign of this species was observed during biological surveys, and this species has not been documented within the general vicinity of the proposed project site according to CNDDB (CDFW 2020).
Insects						
Monarch Butterfly	*Danaus plexippus*	Proposed Threatened	--	--	This species habitats include a variety of open spaces where milkweed grows, such as prairies, meadows, roadsides, and even urban gardens. They need both milkweed for their caterpillars and nectar-rich flowers for the adults. In winter, monarchs from different populations overwinter in specific locations with unique microclimates, such as oyamel fir forests in Mexico for the eastern population and coastal areas in California for the western population.	**None.** This species is heavily dependent on its host plant, milkweed, which was not observed during site reconnaissance. No potential habitat suitable for this species was observed within the proposed project site or buffer area.

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Blennosperma Vernal Pool Andrenid Bee	*Andrena blennospermatis*	--	S1	--	This species typically nest in upland areas surrounding vernal pools. Their habitat includes sandy or dry dirt areas with little vegetation, like old fields, grasslands, dirt roads, and hiking trails. These bees are solitary and ground-nesting, meaning they excavate shallow tunnels in the soil to create nests.	**None**. No potential habitat suitable for this species was observed within the proposed project site or buffer area. The closest known occurrence according to CNDDB lies 0.36+ miles north of the proposed project area.
Brownish Dubiraphian Riffle Beetle	*Dubiraphia brunnescens*	--	S1	--	This species of aquatic beetles typically live in swift-flowing streams and creeks. They favor habitats with rocky substrates, vegetation, and moderate to strong currents. These beetles are often found on submerged rocks and vegetation, and they are sensitive to pollution.	**None**. No potential habitat suitable for this species was observed within the proposed project site or buffer area. No sign of this species was observed during biological surveys, and this species has not been documented within the general vicinity of the proposed project site according to CNDDB
Plants						

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Burke's Goldfields	*Lasthenia burkei*	Endangered	--	1B.1	This species primarily inhabits vernal pools and swales within the Santa Rosa Plain in Sonoma County, California, and Lake and Mendocino Counties; in habitats characterized by seasonal wetlands that are flooded during the winter and spring and dry up during the summer. Due to habitat degradation there are fewer than 10 known occurrences within its known range. Elevational range: 15-600 meters. Blooming period: April through June.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Grassland Suncup	*Camissonia lacustris*	--	S2	1B.2	This species thrives in open, dry, grassland habitats, particularly on the grasslands of the Sierra Nevada foothills and in the Northern Coast Ranges of California. It prefers sandy soils, particularly in sandy openings within various natural and disturbed habitats. It is adapted to dry, open conditions, thriving in areas with less competition. Elevational range: -50 – 500 meters. Blooming period: April through June.	**None**. No potential habitat suitable for this species was observed within the proposed project site or buffer area. The soil type observed on-site is not consistent with that necessary for this plant to thrive. There is a documented occurrence of this species approximately 1.0-miles southwest of the proposed project area, according to CNDDB.

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Konocti Manzanita	*Arctostaphylos manzanita ssp. elegans*	--	S3	1B.3	This species is a rare native shrub that grows in Central and Northern California, primarily in the North Coast and North Coast Range regions. It tends to grow in slopes and rocky places, at elevations from 2000-4600 feet. Elevational range: 0 to 1,500 meters. Blooming period: February through June.	**Potentially Present.** Suitable habitat for Konocti manzanita (Arctostaphylos manzanita ssp. elegans) was present within portions of the project site, particularly in the woodland areas directly west of the proposed lease area. This species is considered a special-status plant with a California Rare Plant Rank (CRPR) of 1B.3, indicating it is rare, threatened, or endangered in California and elsewhere, and is considered sensitive under the California Environmental Quality Act (CEQA). While it is not listed under the federal or state Endangered Species Acts, the species' limited distribution makes it vulnerable to habitat loss, fragmentation, and disturbance. During the May 2025 site walk, Konocti manzanita was not observed within the 0.60-acre portion of the parcel to be impacted by the installation, however, manzanita plants were observed within the 50-foot buffer surveyed west of the proposed lease area (Figure 3).

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Loch Lomond Button-Celery	*Eryngium constancei*	FE	CE; S1	1B.1	This species thrives in vernal pools, particularly in northern California. It's a low-growing, annual herb with tiny white to light purple flowers, found in areas with ponderosa pine and black oak forests. Specifically, it's known to inhabit the Loch Lomond Ecological Reserve in Lake County and other spring-fed pools in Sonoma County. The species is also found in the Lake-Napa Vernal Pool Region, which includes the Boggs Lake-Clear Lake, Diamond Mountain, and Dry Lake core areas. Elevational range: 460 to 855 meters. Blooming period: April through June.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Boggs Lake Hedge-Hyssop	*Gratiola heterosepala*	--	CE; S2	1B.2	This species thrives in semi-aquatic habitats characterized by clay soils and shallow water. This includes areas like vernal pools, marshy regions, lake margins, and even human-made habitats like borrow pits and cattle ponds. The plant is also found in seasonal wetlands within open juniper and sagebrush areas. Elevational range: 10 to 2,375 meters. Blooming period: April through August.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Lake County Western Flax	*Hesperolinon didymocarpum*	--	CE; S1	1B.2	This species is an annual herb found in California, specifically in Lake County. It typically grows in chaparral ecosystems with serpentine soils, particularly in open areas. The plant is known for its white to light pink flowers, which bloom from May to June. Elevational range: 330 to 365 meters. Blooming period: May through June.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Few-Flowered Navarretia	*Navarretia leucocephala ssp. pauciflora*	FE	CT; S1	1B.1	This species is a vernal pool plant, meaning it thrives in temporary, shallow wetlands that fill with water during winter and spring but dry up in the summer. It is specifically found in vernal pools with volcanic ash or basalt substrates in northern California. These pools are often located in areas with chaparral, grassland, or mixed coniferous forest vegetation. Elevational range: 400 to 855 meters. Blooming period: May through July.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Many-Flowered Navarretia	*Navarretia leucocephala ssp. plieantha*	FE	CE; S1	1B.2	Found in cismontane woodland, lower montane coniferous forest, meadows and seeps, valley and foothill grassland, vernal pools/mesic. Specifically, it is associated with the Collayomi-Aiken-Whispering soil complex found at Boggs Lake. Elevation ranges from Elevational range: 5 to 1,740 meters. Blooming period: April through July.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Slender Orcutt Grass	*Orcuttia tenuis*	FT	CE; S2	1B.1	This species is a threatened, annual grasslike herb native to California, and it's found exclusively in vernal pools on Northern Volcanic Ashflow and Northern Volcanic Mudflow soils. These pools are characterized by their temporary water, filling during the wet season and drying out in the summer. The grass thrives in areas with relatively deep and long-lasting inundation. Elevational range: 35 to 1,760 meters. Blooming period: May through October.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Geysers Panicum	*Panicum acuminatum var. thermale*	--	CE; S2	1B.2	This species is a rare grass species found in California's hydrothermal areas, particularly around hot springs and geysers. It thrives in warm, moist, mineralized soils, often along the edges of hot springs and in areas with bubbling springs and steam vents. Elevational range: 500 to 2,700 meters. Blooming period: June through September.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	Habitat / Observances	Potential to Occur on Project site and Buffer Area
Lake County Stonecrop	*Sedella leiocarpa*	FE	CE; S1	1B.1	Lake County stonecrop is an annual, succulent plant that thrives in seasonally wet depressions and shallow vernal pools on volcanic substrates. Lake County stonecrop is only known from Lake County, and the California Natural Diversity Database only identifies six extant occurrences of the species. Elevational range: 400 to 800 meters. Blooming period: April through May.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).
Keck's Checkerbloom	*Sidalcea keckii*	FE	S2	1B.1	This species grows in grasslands and grassy openings in blue oak woodland on serpentine-derived clay soils. This species is known only from Fresno and Tulare counties. It grows on Bureau of Reclamation Land near Pine Flat Reservoir. Elevational range: 75 to 650 meters. Blooming period: April through May.	**None.** No potential habitat suitable for this species was observed during surveys. This species has not been documented within the boundaries of or in proximity to the proposed project area (CDFW 2020).

Status Codes: Federal State FE = Federally listed as Endangered CE = California listed as Endangered FT = Federally listed as Threatened CT = California listed as Threatened FC = Federal Candidate species CR = California listed as Rare CFP = California Fully Protected CSC = Species of Special Concern WL = CDFW Watch List California Rare Plant Rank (formerly known as CNPS Lists) California Rare Plant Rank 1A = Plants presumed extinct in California California Rare Plant Rank 1B = Plants rare, threatened, or endangered in California and elsewhere California Rare Plant Rank 2A = Plants presumed extirpated from California, but more common elsewhere California Rare Plant Rank 2B = Plants rare or endangered in California, but more common elsewhere California Rare Plant Rank 3 = Plants about which we need more information; a review list California Rare Plant Rank 4 = Plants of limited distribution; a watch list. California Rare Plant Rank Rarity Status of .1 = Seriously endangered in California California Rare Plant Rank Rarity Status of .2 = Fairly endangered in California Status, distribution, and habitat information from the California Department of Fish and Wildlife

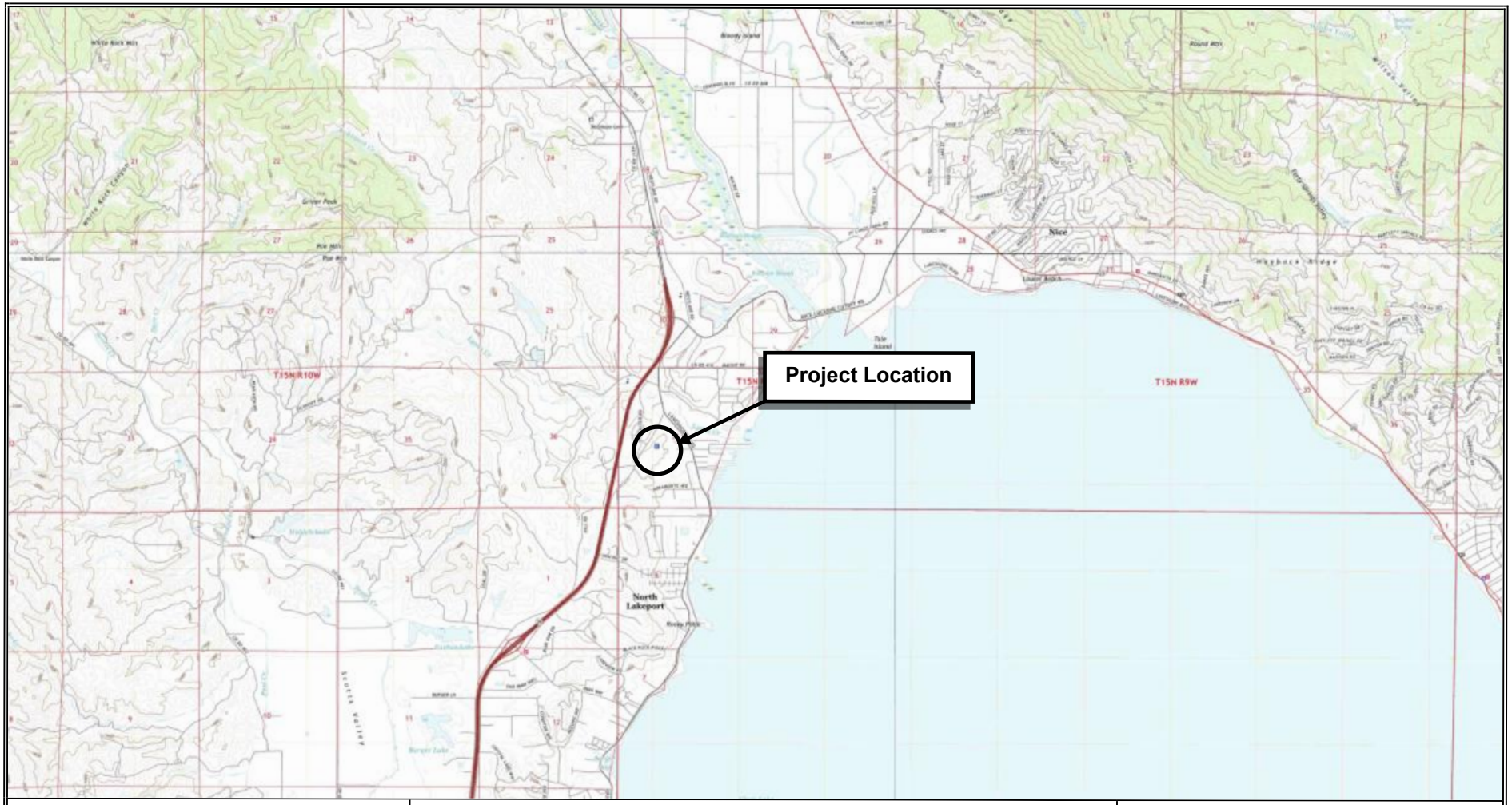
(CDFW) California Natural Diversity Database RareFind 5 (CDFW 2020); California Native Plant Society, California Rare Plant Electronic Inventory (CNPS 2020); and USFWS Online Endangered Species Database (USFWS 2020).

Table 2: Complete Plant Inventory List – 5017 Terrace Avenue

Species Name	Common Name
Quercus douglasii	Blue Oak
Quercus agrifolia	Coast Live Oak
Heteromeles arbutifolia	Toyon
Phytolacca decandra	American Pokeweed
Daucus carota	Wild Carrot
Lupinus bicolor	Miniature Lupine
Briza maxima	Greater Quaking Grass
Acmispon americanus	Spanish Clover
Aira caryophyllea	Silver Hairgrass
Saxifraga californica	California Saxifrage
Castilleja attenuate	Valley Tassels
Vicia villosa	Hairy Vetch
Galium porrigens	Graceful Bedstraw
Avena barbata	Slender Wild Oat
Briza minor	Little Quaking Grass
Madia gracilis	Grassy Tarweed
Trifolium dubium	Lesser Hop Trefoil
Juncus bufonius	Toad Rush
Juncus effusus	Common Rush
Juncus patens	Spreading Rush

Table 3: Complete Wildlife Inventory List – 5017 Terrace Avenue

Species Name	Common Name
Odocoileus hemionus hemionus	Black-tailed Deer
Otospermophilus beecheyi	Common Ground Squirrel
Buteo jamaicensis	Red-tailed Hawk
Agelaius tricolor	Tricolored Black Bird
Corvus corax	Common Raven
Zenaida macroura	Mourning Dove
Carpodacus mexicanus	House Finch
Sturnus vulgaris	European Starling
Mimus polyglottos	Northern Mockingbird



VB BTS III, LLC –
US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Figure 1
Project Vicinity Map

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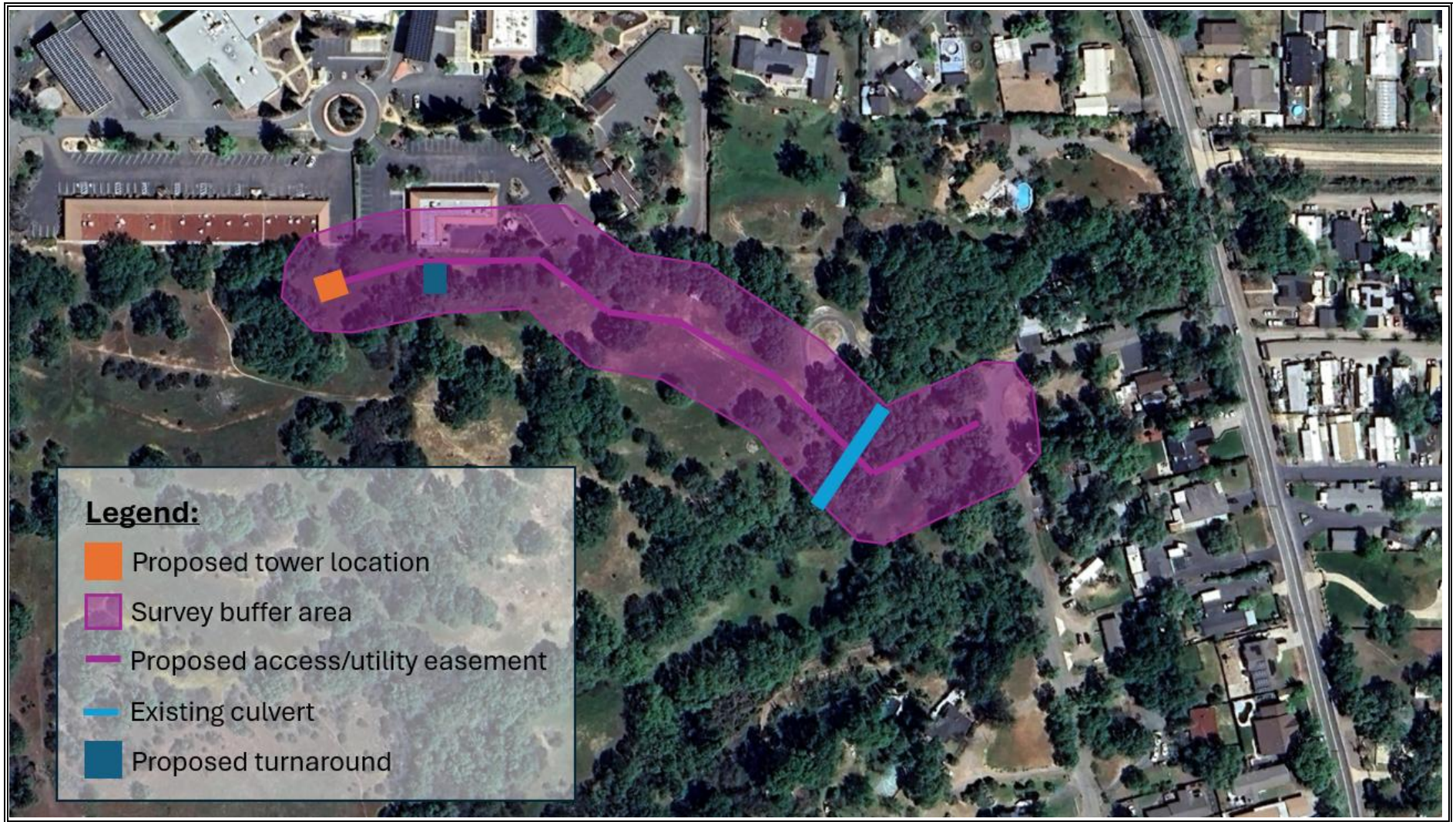

VB BTS III, LLC –
US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Figure 2
Project Location Map

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VB BTS III, LLC –
US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Figure 3
CNDDB Species Occurrences in the Vicinity of the Project Area

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Appendix B

Site Photographs

Site Photograph 1 – Looking north at the Site

Site Photograph 2 – Looking south at the Site

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 3 – Looking east at the Site

Site Photograph 4 – Looking west at the Site

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 5 – Looking north away from the Site

Site Photograph 6 – Looking south away from the Site

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 7 – Looking east away from the Site

Site Photograph 8 – Looking west away from the Site

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 9 – Looking east along the proposed access/utility easement

Site Photograph 10 – Looking west along the proposed access/utility easement

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 11 – Looking west along the access/utility easement with seasonal riverine on the right

Site Photograph 12 – Looking west along the seasonal riverine across southern leg of gravel access road

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 2025

Site Photograph 11 – Looking north at culvert at access point at Terrace Avenue

Site Photographs

The Towers, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

Photographed:

May 16, 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: 05/06/2025 03:18:01 UTC
Project Code: 2025-0092635
Project Name: US-CA-7286 North Lakeport

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: 2025-0092635
Project Name: US-CA-7286 North Lakeport
Project Type: Communication Tower New Construction
Project Description: Construction of new telecommunications tower
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.10342895,-122.9047587,14z

Counties: Lake County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 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[1], 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
Northern Spotted Owl *Strix occidentalis caurina* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1123	Threatened

REPTILES

NAME	STATUS
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

FISHES

NAME	STATUS
Clear Lake Hitch *Lavinia exilicauda chi* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9298	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Burke's Goldfields *Lasthenia burkei* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4338	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	Global_Rank	State_Rank	Rare_Plant_Rank	CDFW_Status	Taxon_Group
Pandion haliaetus	osprey	None	None	G5	S4		WL	Birds
Agelaius tricolor	tricolored blackbird	None	Threatened	G1G2	S2		SSC	Birds
Camissonia lacustris	grassland suncup	None	None	G2	S2	1B.2		Dicots
Arctostaphylos manzanita ssp. elegans	Konocti manzanita	None	None	G5T3	S3	1B.3		Dicots
Hysterocarpus traskii lagunae	Clear Lake tule perch	None	None	G5T3	S3		SSC	Fish
Archoplites interruptus	Sacramento perch	None	None	G1	S1		SSC	Fish
Lavinia exilicauda chi	Clear Lake hitch	Proposed Threatened	Threatened	G4T1	S1			Fish
Andrena blennospermatis	Blennosperma vernal pool andrenid bee	None	None	G2	S1			Insects
Dubiraphia brunnescens	brownish dubiraphian riffle beetle	None	None	G1	S1			Insects
Gonidea angulata	western ridged mussel	None	None	G3	S2			Mollusks

U.S. Fish and Wildlife Service

National Wildlife Refuge System Map

North

USFWS – Wildlife Refuge Map

VB BTS III, LLC - US-CA-7286 North Lakeport

5017 Terrace Avenue

Lakeport, California 954053

TRILEAF

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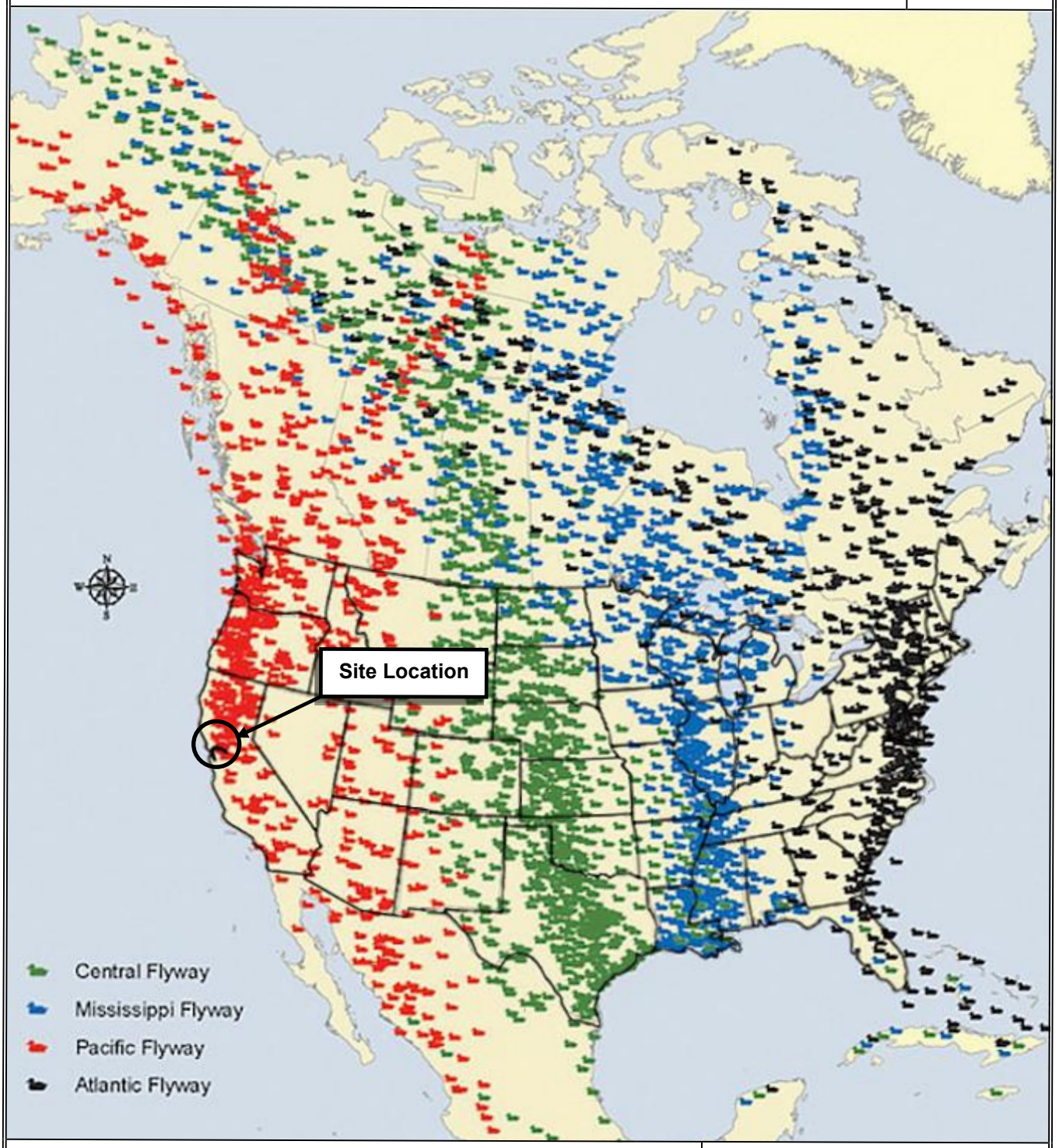
North American Migration Flyways

North



Migratory Bird Flyways – Location Map

VB BTS III, LLC - US-CA-7286 North Lakeport
5017 Terrace Avenue
Lakeport, California 95453

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U.S. Fish and Wildlife Service
National Wetlands Inventory

US-CA-7286 North Lakeport

May 6, 2025

Wetlands

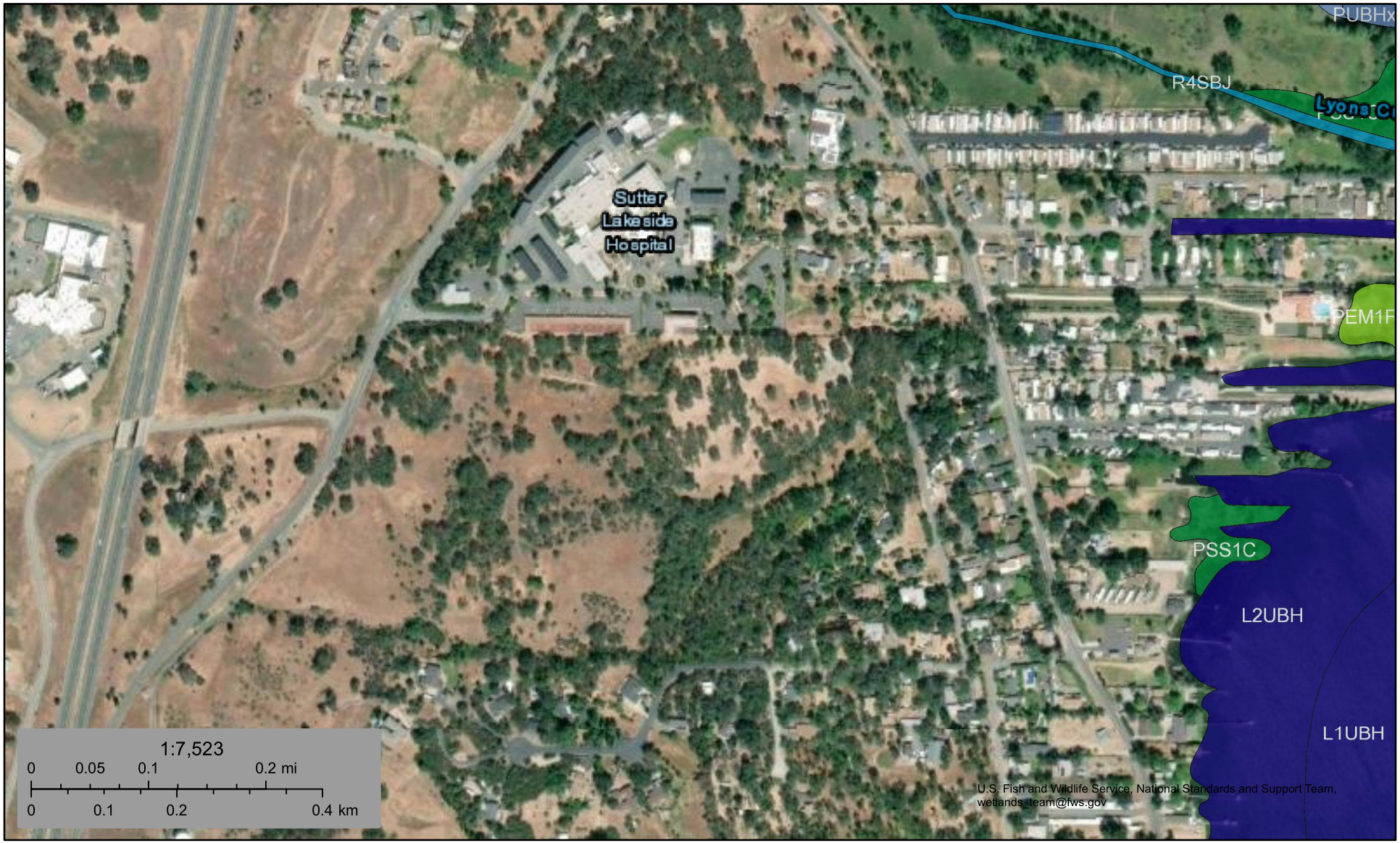
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

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.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

U.S. Fish and Wildlife Service
National Wetlands Inventory

US-CA-7286 North Lakeport - zoomed out



January 13, 2026

Wetlands

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

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

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

N

Meters: 0 40 80 160 240

Feet: 0 100 200 400 600

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: Lake County, California
Survey Area Data: Version 21, Aug 28, 2024

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

Date(s) aerial images were photographed: Apr 7, 2022—May 31, 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
163	Manzanita gravelly loam, 8 to 25 percent slopes	14.8	100.0%
Totals for Area of Interest		**14.8**	**100.0%**

Lake County, California

163—Manzanita gravelly loam, 8 to 25 percent slopes

Map Unit Setting

National map unit symbol: hf6q
Elevation: 1,000 to 1,600 feet
Mean annual precipitation: 25 to 35 inches
Mean annual air temperature: 57 degrees F
Frost-free period: 160 to 200 days
Farmland classification: Not prime farmland

Map Unit Composition

Manzanita and similar soils: 85 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Manzanita

Setting

Landform: Terraces
Landform position (two-dimensional): Backslope
Landform position (three-dimensional): Tread
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium

Typical profile

H1 - 0 to 7 inches: gravelly loam
H2 - 7 to 35 inches: gravelly sandy clay loam
H3 - 35 to 60 inches: gravelly clay

Properties and qualities

Slope: 8 to 25 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: 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: Moderate (about 7.5 inches)

Interpretive groups

Land capability classification (irrigated): 4e
Land capability classification (nonirrigated): 4e
Hydrologic Soil Group: C
Ecological site: R014XD085CA - CLAYEY TERRACE (BLUE OAK/ ANNUAL GRASS)

Hydric soil rating: No

Minor Components

Forbesville
Percent of map unit: 8 percent
Hydric soil rating: No

Steeper slopes
Percent of map unit: 7 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: Lake County, California
Survey Area Data: Version 21, Aug 28, 2024

Appendix D

Qualifications

TRILEAF

Professional Resume

RANDI HONEYCUTT

PROJECT SCIENTIST II

Education

M. S. Ecology, Evolution, and Marine Biology
University of California / Santa Barbara, CA

B. S. Aquatic Biology
University of California / Santa Barbara, CA

Areas of Expertise

Ms. Honeycutt 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. Honeycutt has experience 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

OSHA 40-Hour HAZWOPER
American Academy of Underwater Scientists, member since 2015
AAUS Certified Scientific Diver
SSI Dive Control Specialist
Adult and Pediatric First Aid/CPR/AED/O_2

TRILEAF

Professional Resume

RACHEL BISHOP

SENIOR PROJECT SCIENTIST

Education

B.S. Environmental Science and Studies / Emphasis in Biology
Towson University / Towson, MD

Areas of Expertise

Ms. Rachel Bishop 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) for commercial real estate and lending projects. Ms. Bishop has experience performing National Environmental Policy Act (NEPA) reviews for wireless telecommunications projects as well as experience in Migratory Bird Evaluations and Indoor Air Quality Assessments.

Environmental service expertise includes:

Phase I/II Environmental Site Assessments
Property Condition Assessments (PCA)
Historical City Directories
Indoor Air Quality Assessments
Information Section 7 Consultation
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

OSHA 40-Hour HAZWOPER
Environmental Professional (EP) as defined by ASTM Standard E1527-13 (AAI)
ANSI/FCC RF Radiation Safety Competent Person
Adult First Aid/CPR/AED

TRILEAF

Professional Resume

SAMANTHA NEARY, M.S.

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

Basic Wetland Delineation Course (2024)
Burrowing Owl Survey Certification, U.S. Fish and Wildlife Service and Arizona Game and Fish
Introduction to the Mojave Desert Tortoise, Desert Tortoise Council Course Completion
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_2

ASSURANCE
DEVELOPMENT

Attachment 16 –

Biological Assessment Report

8951 Windsor Parkway, Johnston, IA 50131
515.473.6256 · info@impact7g.com
www.impact7g.com

December 14, 2023

Sacramento Fish and Wildlife Office
Attn: Mr. Michael Fris, Field Supervisor
Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

Emailed to: Michael_Fris@fws.gov; fw8sfwocomments@fws.gov

RE: INVITATION TO COMMENT

VB BTS II, LLC – SITE ID #/NAME: US-CA-7286 - NORTH LAKEPORT
5017 S. Terrace Avenue, Lakeport, Lake County, CA 95453
Latitude 39° 06' 12.39" N, Longitude 122° 54' 22.43" W
Impact7G, Inc. Project: VB Phase: #051

Impact7G, Inc. (Impact7G) is in the process of completing a regulatory review, in accordance with the Federal Communications Commission's (FCC) National Environmental Policy Act (NEPA) and/or the National Historic Preservation Act (NHPA), for a proposed telecommunications facility. Impact7G's client VB BTS II, LLC, is proposing to construct a telecommunications facility at the location referenced above. Specifically, VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The overall tower facility design allows for future carrier antenna installations at various centerline heights on the new monopine and associated equipment areas within the proposed fenced lease area. A proposed approximately 20-foot wide by 1155-foot long access and utility easement with a 120-foot hammerhead fire turnaround area will run from the proposed facility southeast, following the path of an existing gravel road, and connecting to S. Terrace Avenue. Antennas will be licensed by the Federal Communications Commission (FCC).

As part of the NEPA process, the following questions are to be answered:

1. Is the site located in or near a designated wilderness area?
2. Is the site located in or near a designated wildlife preserve?
3. Is the site located in or near a designated critical habitat?
4. Does the site sustain plant or animal species either designated or proposed as threatened or endangered?

Impact7G reviewed the IPAC list for occurrence of endangered, threatened, and candidate species and designated critical habitat and conducted site reconnaissance at the project site. Based on this review and site reconnaissance, Impact7G is recommending a determination of "**no effect**" for this project.

Impact7G is requesting information regarding the potential effect on the above NEPA criteria from your office. Additional project information is enclosed. If you wish to comment or be considered as a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be presumed that you have no objections to this undertaking.

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at amccool@impact7g.com.

Sincerely,

Andrea McCool

Andrea McCool
Environmental Specialist
Impact7G, Inc.

Enclosure

8951 Windsor Parkway, Johnston, IA 50131
515.473.6256 · info@impact7g.com
www.impact7g.com

INFORMAL BIOLOGICAL ASSESSMENT

RE: VB BTS II, LLC – SITE ID #/NAME: US-CA-7286 - NORTH LAKEPORT
5017 S. Terrace Avenue, Lakeport, Lake County, CA 95453
Latitude 39° 06' 12.39" N, Longitude 122° 54' 22.43" W
Impact7G, Inc. Project: VB Phase: #051

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Impact7G performed an Informal Biological Assessment (IBA) for the proposed project footprint. The purpose of this IBA is to provide review and documentation of impacts to proposed threatened or endangered species or designated critical habitat from the proposed undertaking. The proposed project footprint was based on provided project information and evaluated by Impact7G. Impact7G performed a field visit, reviewed maps, aerial photography and corresponded with applicable state and/or federal agencies in an attempt to identify critical habitat or threatened/endangered species in the project area.

In addition, Impact7G researched the listed or proposed threatened or endangered species or designated critical habitat for the the project area. The list of species is attached and observations for the proposed project area are summarized in the following table:

SPECIES	SPECIES OBSERVED	HABITAT OBSERVED	COMMENTS
BIRDS			
Northern Spotted Owl *Strix occidentalis caurina* - Threatened	No	No	VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The project is located in a hilly, suburban area adjacent to a medical campus. The site will be accessed via an existing gravel access road. Based on the encountered habitat and project scope, it is unlikely that this species will be negatively affected by this project.
REPTILES			
Northwestern Pond Turtle *Actinemys marmorata* - Proposed Threatened	No	No	VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The project is located in a hilly, suburban area adjacent to a medical campus. The site will be accessed via an existing gravel access road. Based on the encountered habitat and project scope, it is unlikely that this species will be negatively affected by this project.

INSECTS			
Monarch Butterfly *Danaus plexippus* - Candidate	No	No	VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The project is located in a hilly, suburban area adjacent to a medical campus. The site will be accessed via an existing gravel access road. Based on the encountered habitat and project scope, it is unlikely that this species will be negatively affected by this project.
FLOWERING PLANTS			
Burke's Goldfields *Lasthenia burkei* - Endangered	No	No	VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The project is located in a hilly, suburban area adjacent to a medical campus. The site will be accessed via an existing gravel access road. Based on the encountered habitat and project scope, it is unlikely that this species will be negatively affected by this project.

Based on our assessment, neither the species nor their habitats have been observed within the proposed project footprint. Therefore, Impact7G is recommending a determination of "**no effect**" for listed species as a result of this proposed project.

In addition, the *Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation and Decommissioning* will be provided to the tower construction firm.

If you have any questions or require additional information, please contact me via phone at 515-473-6256 or email at amccool@impact7g.com.

Sincerely,

Andrea McCool

Andrea McCool
Environmental Specialist
Impact7G, Inc.

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: December 13, 2023
Project Code: 2024-0017777
Project Name: VB BTS II, LLC - US-CA-7286 - NORTH LAKEPORT

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 IPaC 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 Migratory Bird Permit | What We Do | U.S. Fish & Wildlife Service (fws.gov).

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: 2024-0017777

Project Name: VB BTS II, LLC - US-CA-7286 - NORTH LAKEPORT

Project Type: Communication Tower New Construction

Project Description: VB BTS II, LLC plans to lease a 40-foot by 40-foot area that will contain an approximately 160-foot (overall height) monopine telecommunications tower. The overall tower facility design allows for future carrier antenna installations at various centerline heights on the new monopine and associated equipment areas within the proposed fenced lease area. A proposed approximately 20-foot wide by 1155-foot long access and utility easement with a 120-foot hammerhead fire turn-around will run from the proposed facility southeast, following the path of an existing gravel road, and connecting to S. Terrace Avenue.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.1031463,-122.90422139282036,14z

Counties: Lake County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 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[1], 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.

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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
Northern Spotted Owl *Strix occidentalis caurina* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1123	Threatened

REPTILES

NAME	STATUS
Northwestern Pond Turtle *Actinemys marmorata* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Burke's Goldfields *Lasthenia burkei* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4338	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

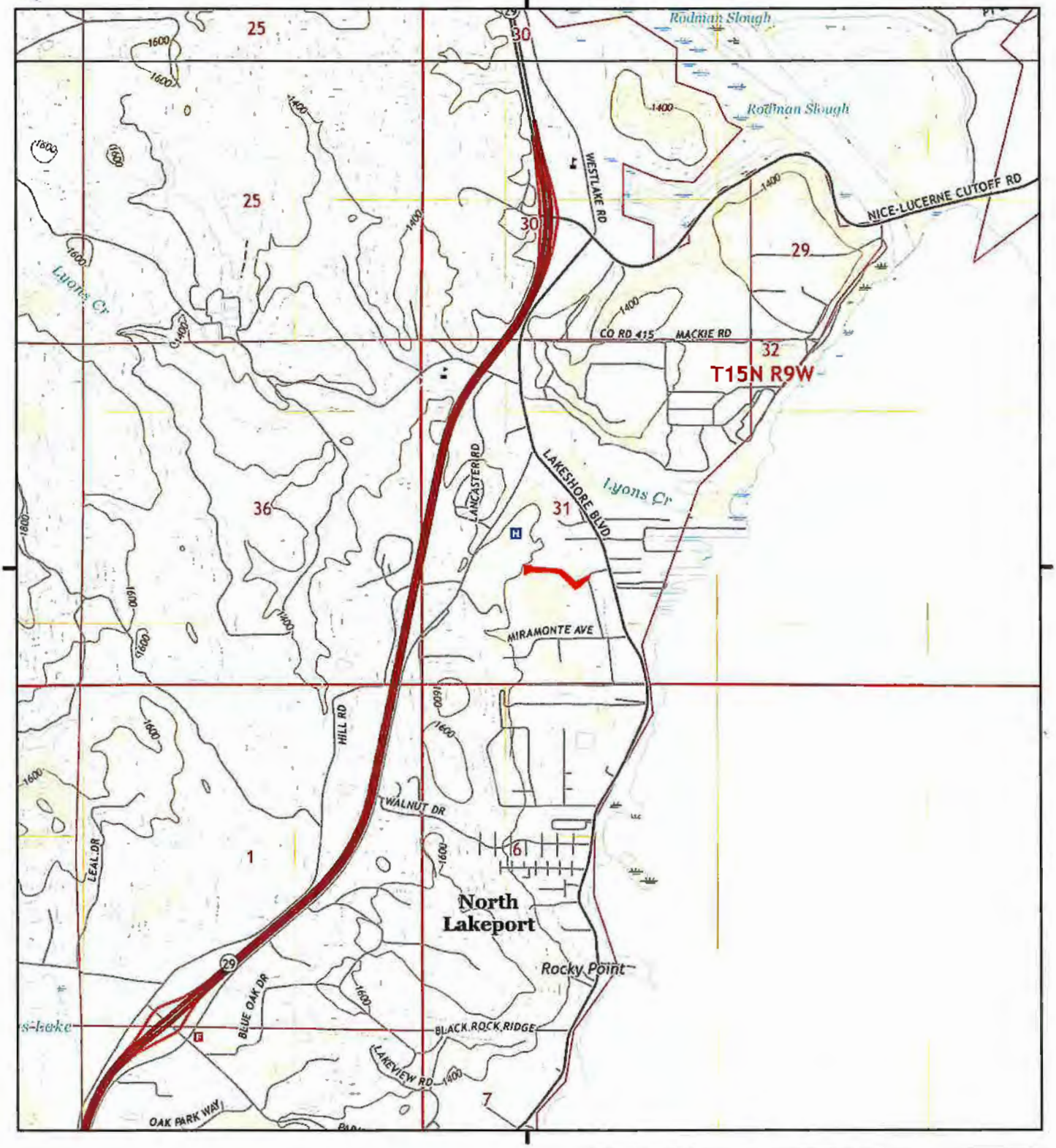
Agency: Impact7G
Name: Andrea McCool
Address: Impact7G - 8951 Windsor Parkway
City: Johnston
State: IA
Zip: 50131
Email amccool@impact7g.com
Phone: 5154736256

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Communications Commission

Historical Topo Map

2022



This report includes information from the following map sheet(s).

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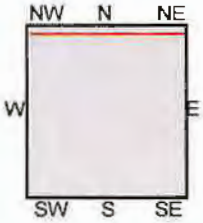

TP, Lakeport, 2022, 7.5-minute
N, Upper Lake, 2022, 7.5-minute

SITE NAME: US-CA-7286/North Lakeport
ADDRESS: 5017 S Terrace Avenue
Lakeport, CA 95453
CLIENT: Impact7G, Inc.

N

INQUIRY #: 7505975.8

YEAR: 2020

= 500'

N

EDR

A.J.Koltavary/Civil Engineers & Land Surveyors

ENGINEERING AND SURVEYING

1-A COORDINATES/ ELEVATION ACCURACY CERTIFICATION, FOR VERTICAL BRIDGE

DATE:	NOVEMBER 6, 2023
SITE NAME:	US-CA-7286
SITE LOCATION (CLOSEST ADDRESS) :	5017 S TERRACE AVE., LAKEPORT, CA 95453
TYPE OF STRUCTURE:	MONOPINE

NAD 83 COORDINATES:

LATITUDE:	39°06'12.39"N (39.103442°)
LONGITUDE:	122°54'22.43"W (-122.906231°)

ELEVATIONS (NAVD88) A.M.S.L

GROUND ELEVATION AT THE BASE OF MONOPINE	= 1393.12' ±
TOP OF PROPOSED MONOPINE BRANCHES	= 1543.12' ±
TOP OF PROPOSED ANTENNA	= 1538.12' ±
RAD CENTER OF PROPOSED ANTENNA	= 1534.12' ±

MEASURED A.G.L HEIGHTS

TOP OF PROPOSED MONOPINE BRANCHES	= 150' - 0" ±
TOP OF PROPOSED ANTENNA	= 145' - 0" ±
RAD CENTER OF PROPOSED ANTENNA	= 141' - 0" ±

METHODOLOGY

GEODETIC COORDINATES AND ELEVATIONS WERE ESTABLISHED USING LEICA GS 18 RECEIVER, RTK GNSS OBSERVATION AND TS 16i TOTAL STATION. POST PROCESSING BY LEICA SOFTWARE. CALIFORNIA ZONE 2.

BENCHMARK REFERENCE: LEICA SMARTNET NETWORK, ADJUSTED JULY 2021.
SURVEY DATE: SEPTEMBER 22, 2023

CERTIFICATION: I THE UNDERSIGNED, A REGISTERED CIVIL ENGINEER, LICENSED UNDER THE LAWS OF THE STATE OF CALIFORNIA TO PRACTICE LAND SURVEYING, DO HEREBY CERTIFY THE LATITUDE AND LONGITUDE COORDINATES AND ELEVATIONS ABOVE MEAN SEA LEVEL LISTED ABOVE ARE BASED ON A FIELD SURVEY DONE UNDER MY SUPERVISION, AND THAT THE ACCURACY OF THOSE COORDINATES MEET OR EXCEED 1-A STANDARDS (HORIZONTAL ACCURACY ± 15 FEET AND VERTICAL ACCURACY ± 3 FEET) AS DEFINED IN THE F.A.A. ASAC INFORMATION SHEET 91:003, AND THAT DATA ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

A.J. Koltavary

ANDREW J. KOLTAVARY, RCE 26571, EXPIRATION: 03/31/2024

REGISTERED PROFESSIONAL ENGINEER
ANDREW J KOLTAVARY
No. 26571
Exp. 03/31/24
CIVIL
STATE OF CALIFORNIA

24 Recodo•Irvine • California • 92620 • Telephone (714) 624.9027