

On July 13, 2012, EBI biologist, Tony Maguire, completed an online resource review of available federal species information (50 CFR 17) for the Site. The review included gathering data from the California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS), Natural Resources Conservation Service (NRCS), USFWS Critical Habitat Portal, National Wetlands Inventory (NWI), T, and on-site photographs. This data helped determine the likelihood of federally-protected species (threatened, endangered, and special concern) being present at the proposed installation site. Table 1 shows the results of that effort.

Table 1.

Species	Federal Status	Critical Habitat	Affect
Northern Spotted Owl (<i>Strix occidentalis caurina</i>)	Threatened	No	May Affect, but Not Likely to Adversely Affect
Popcorn flower (<i>Plagiobothrys strictus</i>)	Endangered	No	No Effect
Clara Hunt's Milk Vetch (<i>Astragalus claranus</i>)	Endangered	No	No Effect

*Source: CNDDDB, 2012 – Calistoga, CA 1980, Saint Helena, CA 1980

The Project Site consists of a mixed second growth redwood and mixed evergreen forest. On-site tree species include redwood (*Sequoia sempervirens*), tan oak (*Notholithocarpus densiflorus*), douglas fir (*Pseudotsuga menziesii*), pacific madrone (*Arbutus menziesii*), bay laurel (*Umbellularia californica*), and Quercus species. Shrubs observed included bay laurel, pacific serviceberry (*Amelanchier alnifolia*), and snowberry (*Symphoricarpos mollis*). Ground cover consisted of combination of dense leaf litter, fallen trees, grasses and ferns. Ferns observed included western swordfern (*Polystichum munitum*) and California swordfern (*Polystichum californicum*). Western fescue (*Festuca occidentalis*), melic grass (*Melica* sp.), and meadow barley (*Hordeum brachyantherum*) comprised the native grass cover.

These natural communities within the Project Site represent viable nesting and foraging habitat for the northern spotted owl. The CNDDDB shows three occurrence records for the northern spotted owl within the immediate vicinity of the Site. The nearest occurrence is located 0.8 miles west of the Site and was last observed with young in the nest in 1998. Another occurrence, located 1.8 miles southwest of the Site, last documented young in a nest in 2005. The third nest, located 2.0 miles northwest of the Site, last documented young in the nest in 2007. All three occurrence records document nesting pairs with young. Since the Site has potential to provide nesting spotted owl nesting habitat, construction related activities, if conducted during the breeding season, may adversely affect this species. Project construction would not adversely affect this species if construction is conducted outside the breeding season (Please See Attached Figures).

In addition, the CNDDDB shows occurrence records for the both the Popcorn flower and Clara Hunt's milk vetch. However, these species typically occur along margins of wetlands/vernal pools associated with valley and foothill grasslands and or seepages associated with broadleaf forest. Since the proposed Site does not support any of these habitat features, neither species would be affected by the Project.

The Site is not located within or adjacent to any USFWS designated Critical Habitat. Therefore, the proposed Project would have no effect on Critical Habitat.

Further, based on the proposed tower design (i.e. 130 foot lattice tower; no guyed-wires; no lighting), the proposed tower facility meets all or most of the USFWS's recommended guidelines for tower design and citing set forth in the 'Service Guidelines on the Siting, Construction, Operation, and Decommissioning of Communications Towers,' dated September 14, 2000. As such, it is the opinion of EBI

Consulting that the proposed facility is unlikely to represent a significant adverse effect on migratory birds.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tony Maguire', with a stylized, cursive script.

Tony Maguire, PWS
Wetland Biologist
(650) 833-9592
tmaguire@ebiconsulting.com

Appendix A:	Figures
Appendix B:	Photographs
Appendix C:	Species List
Appendix D:	Resumes