

# BIOLOGICAL RESOURCES IMPACT ANALYSIS

“MONTARA PEAK, CA”  
McNee State Park Hiking Trail  
Moss Beach, CA 94038  
CBRE Project No.: TS80820403

Prepared For:



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## **SECTION 1: INTRODUCTION**

This report contains the findings of a Biological Resources Impact Analysis conducted by Helix Environmental Planning, Inc. (HELIX) on a proposed American Tower cellular facility, 8630 (Montara Peak CA), near the City of Moss Beach, San Mateo County, California. The project site is generally located north of State Route 92, south of Sharp Park Road, east of State Route 1, and west of Interstate 280, and is depicted on the Montara Mountain, California U.S. Geological Survey (USGS) 7.5-minute topographic map. The proposed project consists of road improvements to an existing access road, specifically the installation of four new 12-foot by 20-foot gravel-covered turnouts.

The project site was surveyed on September 8, 2018 by qualified HELIX biologist Kyle Workman. The biological resources within the site are described in terms of plant communities and jurisdictional drainage features. A literature review provided information regarding sensitive plant and wildlife species potentially occurring within the project site and immediate vicinity. Based on current site conditions and suitable habitat requirements of sensitive species, this report provides an assessment of the sensitive resources found on the site and analyzes the biological significance of the site in view of federal, state, and local laws and policies.

## SECTION 2: METHODOLOGY

### 2.1 - BIOLOGICAL RESOURCES

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

Sensitive biological resources present, or potentially present, onsite were identified through a literature review using the following resources: California Department of Fish and Wildlife (CDFW 2018), California Natural Diversity Data Base (CNDDDB 2018), and the California Native Plant Society (Tibor 2001 and CNPSEI 2018). For the purpose of this report, “sensitive” or “special status” species are those plant or wildlife species that are federally and/or state listed species, proposed for listing, candidate species and CDFW Species of Special Concern.

An initial review indicated that the project site is located within previously disturbed areas associated with the existing access road and the existing cellular facility. The access road is located within McNee Ranch State Park and is also a popular hiking/biking trail. Kyle Workman conducted the biological resources field survey to document existing conditions and to determine potential impacts to sensitive biological resources based on current site plans. The survey was conducted on foot making note of biological resources, such as plant and wildlife species, on field data sheets. These data sheets are included in Appendix A. Special attention was paid to plant communities to determine the presence or potential occurrence of any sensitive species that may occur on the project site.

## SECTION 3: EXISTING CONDITIONS

### 3.1 - SITE DESCRIPTION

The biological assessment survey of the project site was conducted on September 8, 2018. Weather conditions included a temperature of approximately 72 degrees Fahrenheit, winds of 1 to 5 miles per hour, and clear skies. The site is specifically located within McNee Ranch State Park, near the City of Moss Beach, San Mateo County, California. Land use adjacent to the site generally consists of undeveloped open space within the State Park.

The proposed project consists of repairs, maintenance and improvements to an existing access road. In addition, four new 12-foot by 20-foot gravel turnouts are proposed at various locations along the access road.

### 3.2 - VEGETATION

The project site is located within previously disturbed areas associated with the existing cellular facility and access road. The slopes surrounding the existing access road primarily consist of a northern coastal scrub community comprised of native shrubs and scattered herbaceous species. Common species observed include coyote brush (*Baccharis pilularis*), California sagebrush (*Artemisia californica*), poison oak (*Toxicodendron diversilobum*), California coffeeberry (*Frangula californica*), and manzanita (*Arctostaphylos* sp.). Vegetation near the access road entrance and lower elevations consists of mixed conifers and planted ornamental trees including eucalyptus tree (*Eucalyptus* sp.), Monterey pine (*Pinus radiata*), Monterey cypress (*Hesperocyparis macrocarpa*), and Ponderosa pine (*Pinus ponderosa*). A complete list of plant species observed on or in the vicinity of the project site can be found in Appendix A: Field Data Sheets.

### 3.3 - GENERAL WILDLIFE

The project site and surrounding area provide habitat for wildlife species that commonly occur in northern coastal scrub and mixed conifer communities. No amphibian, reptilian, or mammalian species were observed or detected during the field survey. Avian species observed/detected include:

- Western kingbird (*Tyrannus verticalis*)
- Acorn woodpecker (*Melanerpes formicivorus*)
- Common raven (*Corvus corax*)

- Bewick's wren (*Thryomanes bewickii*)
- Turkey vulture (*Cathartes aura*)
- Anna's hummingbird (*Calypte anna*)
- Western scrub jay (*Aphelocoma californica californica*)

Other wildlife species expected to occur onsite include western fence lizard (*Sceloporus occidentalis*), Spotted towhee (*Pipilo maculatus*), and brush rabbit (*Sylvilagus bachmani*).

### 3.4 - SENSITIVE BIOLOGICAL RESOURCES

#### Special Status Species

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

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

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

The California Department of Fish and Wildlife (CDFW) administers the California Endangered Species Act (CESA). The State of California considers an "endangered" species one whose prospects of survival and reproduction are in immediate jeopardy, a "threatened" species is one present in such small numbers throughout its range that it is likely to become an endangered species in the near future in the absence of special protection or management, and a "rare" species is one present in such small

numbers throughout its range that it may become endangered if its present environment worsens. The term “rare” species applies to California native plants. State threatened and endangered species are fully protected against take, as defined above. “Species of special concern” is an informal designation used by CDFW for some declining wildlife species that are not state candidates. This designation does not provide legal protection, but signifies that these species are recognized as sensitive by CDFW.

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

Sensitive habitats are natural communities that support concentrations of sensitive plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife (CNDDDB 2018). Sensitive habitats are not afforded legal protection unless they support protected species, except for wetland habitats, which cannot be filled without authorization from the U.S. Army Corps of Engineers (USACE) and CDFW.

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

- Plants - California Department of Fish and Wildlife (CDFW April 2018), California Natural Diversity Data Base (CNDDDB 2018), and California Native Plant Society (Tibor 2001 and CNPSEI 2018)
- Habitats - CNDDDB (2018), Holland (1986)
- Wildlife - CDFW (2018), CNDDDB (2018)

A review of the CNDDDB and the CNPS Electronic Inventory of Rare and Endangered Vascular Plants resulted in a list of 42 sensitive plant species, 35 sensitive wildlife species, and 4 sensitive plant communities that occur within the Montara Mountain, California USGS topographic quadrangle.



The sensitive plant species include:

- Arcuate bush-mallow (*Malacothamnus arcuatus*)
- Blasdale's bent grass (*Agrostis blasdalei*)
- Broad-lobed leptosiphon (*Leptosiphon croceus*)
- California bottle-brush grass (*Elymus californicus*)
- Choris' popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*)
- Clustered lady's slipper (*Cypripedium fasciculatum*)
- Coast iris (*Iris longipetala*)
- Coast mark milk-vetch (*Astragalus pycnostachyus* var. *pycnostachyus*)
- Coast rockcress (*Arabis biepharophylla*)
- Coast yellow leptosiphon (*Leptosiphon croceus*)
- Coastal triquetrella (*Triquetrella californica*)
- Crystal Springs lessingia (*Lessingia arachnoidea*)
- Fragrant fritillary (*Fritillaria liliacea*)
- Franciscan onion (*Allium peninsulare* var. *franciscanum*)
- Franciscan thistle (*Cirsium andrewsii*)
- Harlequin lotus (*Hosackia gracilis*)
- Hickman's cinquefoil (*Potentilla hickmanii*)
- Hillsborough chocolate lily (*Fritillaria biflora* var. *ineziana*)
- Island tube lichen (*Hypogymnia schizidiata*)
- Johnny-nip (*Castilleja ambigua* var. *ambigua*)
- Kellogg's horkelia (*Horkelia cuneata* ssp. *sericea*)
- Kings Mountain manzanita (*Arctostaphylos regismontana*)
- Morro manzanita (*Arctostaphylos morroensis*)
- Ocean bluff milk-vetch (*Astragalus nuttallii* var. *nuttallii*)
- Omduff's meadowfoam (*Limnanthes douglasii* ssp. *ornduffii*)
- Oregon polemonium (*Polemonium carneum*)
- Pappose tarplant (*Centromadia parryi* ssp. *parryi*)
- Perennial goldfields (*Lasthenia californica* ssp. *macrantha*)
- Point Reyes horkelia (*Horkelia marinensis*)
- Rose leptosiphon (*Leptosiphon rosaceus*)
- Salt-marsh wandering shrew (*Sorex vagrans halicoetes*)
- San Francisco Bay spineflower (*Chorizanthe cuspidata* var. *cuspidata*)
- San Francisco campion (*Silene verecunda* ssp. *verecunda*)
- San Francisco collinsia (*Collinsia multicolor*)
- San Francisco gumplant (*Grindelia hirsutula* var. *maritima*)



- San Francisco owl's-clover (*Triphysaria floribunda*)
- San Francisco wallflower (*Erysimum franciscanum*)
- San Mateo tree lupine (*Lupinus arboreus* var. *eximius*)
- Scouler's catchfly (*Silen scouleri* ssp. *scouleri*)
- Western leatherwood (*Dirca occidentalis*)
- White-rayed pentachaeta (*Pentachaeta bellidiflora*)
- Woodland woollythreads (*Monolopia gracilens*)

Proposed development will be contained within previously disturbed areas associated with the existing access road and cellular facility. This disturbance includes excavation, backfilling, and compaction activities resulting from previous construction and maintenance activities. Evidence of surface disturbance on and in the immediate vicinity of the site has greatly reduced the potential for sensitive plant species to occupy the area. Therefore, none of the above-listed sensitive plant species are anticipated to occur onsite, and the proposed project is not anticipated to result in any impacts to sensitive plant species. No further action is recommended with regard to sensitive plant species.

The sensitive wildlife species include:

- Alameda song sparrow (*Melospiza melodia pusillula*)
- American badger (*Taxidea taxus*)
- Bald eagle (*Haliaeetus leucocephalus*)
- Big free-tailed bat (*Nyctinomops macrotis*)
- Bumblebee scarab beetle (*Lichnanthe ursina*)
- California brown pelican (*Pelecanus occidentalis californicus*)
- California giant salamander (*Dicamptodon ensatus*)
- California red-legged frog (*Rana aurora draytonii*)
- California Ridgway's rail (*Rallus obsoletus obsoletus*)
- Cooper's hawk (*Accipiter cooperi*)
- Foothill yellow-legged frog (*Rana boylei*)
- Fringed myotis (*Myotis thysanodes*)
- Hoary bat (*Lasiurus cinereus*)
- Longfin smelt (*Spirinchus thaleichthys*)
- Marbled murrelet (*Brachyramphus marmoratus*)
- Merlin (*Falco columbarius*)
- Mission blue butterfly (*Plebejus icarioides missionensis*)
- Monarch butterfly (*Danaus plexippus*)
- Myrtle's silverspot butterfly (*Speyeria zerene myrtleae*)

- Olive-sided flycatcher (*Contopus cooperi*)
- Orcutt's bird's-beak (*Cordylanthus orcuttianus*)
- Pacific lamprey (*Entosphenus tridentatus*)
- Pallid bat (*Antrozous pallidus*)
- River lamprey (*Entosphenus tridentatus*)
- Saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*)
- San Bruno elfin butterfly (*Callophrys mossii bayensis*)
- San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*)
- San Francisco forktail damselfly (*Ischnura gemina*)
- San Francisco garter snake (*Thamnophis sirtalis tetrataenia*)
- Steelhead - south/central California coast ESU (*Oncorhynchus mykiss irideus*)
- Townsend's big-eared bat (*Corynorhinus townsendii*)
- Western bumble bee (*Bombus occidentalis*)
- Western pond turtle (*Actinemys marmorata*)
- Western snowy plover (*Charadrius alexandrius nivosus*)
- White-tailed kite (*Elanus leucurus*)

The project site is located within USFWS designated critical habitat for California red-legged frog. Portions of the proposed access road provide suitable foraging/dispersing habitat for California red-legged frog.

Pacific stonecrop (*Sedum spathulifolium*) was observed on the hillsides immediately adjacent to the existing access road. Stonecrop is the larval host plant of the San Bruno elfin butterfly and this species has a potential to occur onsite.

The sensitive plant communities include:

- Northern coastal salt marsh
- Northern maritime chaparral
- Serpentine bunchgrass
- Valley needlegrass grassland

No sensitive plant communities occur on the project site.

### 3.5 - JURISDICTIONAL AREAS

The USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. USACE regulatory jurisdiction pursuant to Section 404 of the federal Clean Water Act is founded on a

connection or nexus between the water body in question and interstate commerce. This connection may be direct through a tributary system, linking a stream channel with traditional navigable waters used in interstate or foreign commerce, or may be indirect, through a nexus identified in the USACE regulations.

### **Waters of the U.S.**

USACE jurisdiction over non-tidal waters of the United States extends laterally to the ordinary high water mark (OHWM) or beyond the OHWM to the limit of any adjacent wetlands, if present (33 CFR 328.4). The OHWM is defined as “that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area” [33 CFR 329.11(a) (1)]. Jurisdiction typically extends upstream to the point where the OHWM is no longer perceptible. Recently, the federal courts have restricted USACE jurisdiction over waters that are not directly connected to traditional navigable waters (isolated waters), thereby increasing the focus on clearly establishing the physical connection between the subject water body(ies) as a tributary to traditional navigable waters or otherwise by directly establishing the nexus with interstate commerce.

During the biological assessment survey, the site was evaluated according to the guidelines provided in the USACE 1987 Manual (i.e. Environmental Laboratory, 1987). Waters of the U.S. were absent from the site; no water bodies having a perceptible OHWM were identified on site or adjacent to the site.

### **Wetlands**

The USACE and EPA define “wetlands” as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted to life in saturated soil conditions.” In order to be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met. Several parameters may be analyzed to determine whether the criteria are satisfied.

The project site and surrounding area contain plant species commonly found in disturbed/developed and ornamental communities. No hydrophytic plant species were observed on the project site; therefore, it was not necessary to examine the other two wetland criteria (hydrology and soils), since

all three criteria must be met where wetlands are present. No jurisdictional wetlands will be impacted by the installation of the proposed facility.

### 3.6 - NESTING BIRDS

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

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

The trees and shrubs located on and within the immediate vicinity of the access road provide suitable nest sites for avian species. No nests or nesting activity were observed during the biological assessment survey.

## SECTION 4: SENSITIVE BIOLOGICAL RESOURCES IMPACT ANALYSIS

### 4.1 - SENSITIVE PLANT AND WILDLIFE SPECIES

- **Sensitive Plant Species:** The project site contains no suitable habitat for any sensitive plant species. Therefore, no sensitive plant species have a moderate or high potential to occur onsite and focused surveys are not recommended.
- **Sensitive Wildlife Species:** The entire access road is located within USFWS designated critical habitat for California red-legged frog, a federally threatened species and a California Species of Special Concern. Suitable foraging and dispersal habitat for California red-legged frog occurs on and within the immediate vicinity of the project site. Therefore, USFWS consultation will be required to gain full project approval.
- Stonecrop, the larval host plant for the San Bruno elfin butterfly was observed within the immediate vicinity of the existing access road. San Bruno elfin butterfly is federally listed as endangered. Although the host plant is not anticipated to be directly impacted, the proposed road repairs could result in impacts to San Bruno elfin butterfly. Therefore, USFWS consultation will be required to gain full project approval.
- **Sensitive Plant Communities:** No sensitive plant communities occur on the project site; none will be impacted by the proposed project.

### 4.2 - JURISDICTIONAL AREAS

No potentially jurisdictional waters or wetlands are present on the project site. Therefore, installation of the proposed facility will not impact any jurisdictional areas.

### 4.3 - NESTING BIRDS

The trees and shrubs located on and within the immediate vicinity of the access road provide suitable nest sites for avian species. Therefore, pursuant to the MBTA and CFG Code, installation of the proposed facility should be conducted outside the nesting season. The nesting season generally extends from early February through August, but can vary slightly from year to year based upon seasonal weather conditions.

If facility installation must occur during the nesting season, a qualified biologist should conduct a pre-construction nesting bird survey to identify any potential nesting activity. If active nests are observed, construction activity must be prohibited within a 500-foot (~160-meter) buffer around the

nest until the nestlings have fledged. All construction activity within the vicinity of active nests must be conducted in the presence of a qualified biological monitor. Construction activity may encroach into the buffer area at the discretion of the biological monitor.

## SECTION 5: REFERENCES

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## **Appendix A: Field Data Sheets and Site Photograph**

**Field Notes – 8630 (Montara Peak)**

**Date:** 09/08/2018

**Location:** Moss Beach (McNee State Park), San Mateo County, California

**Time:** 9:15 am to 12:45 pm

**Weather Conditions:** 1 to 5 mile per hour winds, clear skies with a temperature of 72 degrees

**Plant Community/Site description:** Site consists of road maintenance and repairs to an existing access road approximately 4-miles in length. The road consists of compacted dirt with a few asphalt areas and with little to no vegetation. Also proposed are 4 new gravel covered turnouts. Several of the turnouts will impact northern coastal scrub habitat. The access road is a popular hiking trail and steep slopes surround the site.

**Wildlife Species Observed:**

Kingbird	acorn woodpecker	common raven	Bewick's wren
Turkey vulture	Anna's hummingbird	scrub jay	

**Plant Species Observed:**

Ponderosa pin	Monterey pine	Monterey cypress	poison oak
English ivy	Eucalyptus tree	coyote brush	pampas grass
Gnaphalium	horseweed	sword fern	California sagebrush
Monkeyflower	stonecrop	Manzanita	mustard
Ceanothus	coffeeberry	sow thistle	lady fern
Lupine			



View of lower proposed turnout location facing south.



View of lower proposed turnout location facing south.



View of lower proposed turnout location facing southeast.



View of 2nd proposed turnout location.



View of 2nd proposed turnout location.



View of 3rd proposed turnout location.





View of 2nd proposed turnout location.



View of turnout and existing access road.



View of 3rd proposed turnout location.



View of 3rd proposed turnout location.





View of upper proposed turnout location.



View of stonecrop adjacent to access road.



View of stonecrop adjacent to access road



View of existing access road.



View of existing access road and cellular facility.



View of existing access road near trailhead facing west.



View of existing access road near trailhead facing east.