

**Special-Status Species
Botanical Survey Report
RTE 20 217 Communications Tower
Project
Lake County, California**

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1.0 Introduction

1.1 Project Overview and Study Objectives

A review of zoning drawings indicated that the proposed project would include:

- Construction of 30 feet by 30 feet (900 square feet, or 0.02 acres of ground disturbance) level pad area. The pad area would be covered with gravel on portions not used for equipment installation. 100 % of the tower site would occur within undisturbed chaparral habitat;
- Construction of a short driveway to the tower site from the existing access roadway. The access roadway would measure 15 feet by 30 feet (450 square feet, or 0.01 acres);
- Installation of a 150-foot Lattice tower on the pad area;
- Installation of telecommunications equipment and other related equipment within various areas of the gravel pad;
- Installation of a six (6) foot tall chain link fence around the telecommunications site;
- Installation of 1,250 feet (0.24 miles) of underground power and fiber optic cable between the tower site and an existing connection point near State Highway 20 and the terminus of the existing access road. These cables will be installed in the existing access road in pre-disturbed areas and within chaparral habitat previously disturbed during the construction of the tower site and access driveway.

The existing access roadway would be upgraded as well to provide access to the telecommunications tower site. Minor grading of the existing roadway would be conducted, and AB gravel would be applied to create stable access to the tower site. All work would occur within the current boundaries of the existing roadway. The access roadway will be an all surface roadway that will be capable of supporting equipment weighing up to 75,000 pounds.

The proposed project will permanently disturb approximately 1,350 square feet (0.03 acres) of undisturbed land that is currently vegetated with native chaparral habitat for construction of the tower site and proposed access driveway. All other project activities would occur within existing disturbed areas (access road and fiber-optic cable/power alignment).

The estimated time period for construction is 90 working days for the entire project. Work will begin as soon as all regulatory clearances and permits are obtained.

To comply with the requirements of the California Environmental Quality Act (CEQA) and the various requirements of permitting agencies for the proposed project, rare plant surveys were conducted throughout the project area, with particular emphasis on sensitive habitats.

During the rare plant surveys, no rare plant species were identified in the study area.

1.2 Description of Study Area

The proposed project site is located in central Lake County, California. The proposed project site is located in Section 2, Township 13 North, Range 7 West, MDBM of the U.S. Geological Survey [USGS] Benmore Canyon 7.5-minute quadrangle map. Figures 1 and 2 depict the location of the proposed project site. The proposed project site is located in areas of chaparral, non-native annual grassland, and ruderal disturbed habitat.

The proposed project site and buffer area do not lie within any USFWS designated critical habitat areas for protected wildlife or plant species (USFWS 2025). Habitat types observed during our biological field surveys are described below.

The following is a discussion of existing vegetation communities found within the proposed project site and buffer area. Three (3) vegetation community types were observed within the study area. Where appropriate vegetation community types are described using The Manual of California Vegetation Online Website (CNPS 2025). Vegetation types observed were: 1. *Adenostoma fasciculatum* Shrubland Alliance, 2. *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance, and 3. Ruderal-disturbed vegetation.

1. *Adenostoma fasciculatum* Shrubland Alliance was observed within the undeveloped portions of the proposed project site, as well as large areas of the project buffer area. Most of this biome only gets about 10-17 inches of rain, but in California rainfall amounts of up to 40 inches may occur at northern and high elevation locations. Most rain comes in the winter. Because of the long period of summer, only plants with hard leaves, such as scrub oaks and chamise shrubs, can survive.

Most chaparral vegetation occurs on steep hills and mountains below 5,000 feet elevation. Chaparral soils range from deep, weakly developed soils to shallow, rocky soils. Generally chaparral is thought to occur upon thin, porous, and rocky soils that are relatively low in nitrogen, potassium and phosphorous. While chaparral and other Mediterranean-type vegetation changes over time (depending on fire and disturbance regimes), chaparral is likely to be the edaphic climax vegetation on well-drained rocky soils with or without the influence of fire. Due to their coarse grain size and their high content of weatherable minerals, these soils are susceptible to erosion, and on steeper slopes, to landslides.

Soils under chamise may exhibit hydrophobicity, repelling water on the soil surface. However, when water does penetrate the soil surface, it drains rapidly through the coarse soil textures, offering little water-holding capacity. Fire can cause some soils to become water repellent or hydrophobic. The mechanism of

hydrophobic soil formation has been explained and identified as important to post-fire sediment yields.

Chaparral is composed largely of evergreen, sclerophyllous shrub species that range from 1 to 4 meters in height. Other growth forms including soft-leaved subshrubs, perennial herbs, geophytes (bulbs and corms), and annual herbs, are less abundant in mature chaparral but can be present in abundance in early and late successional stands of chaparral. Depending on the species composition and underlying topography and soil, the structure of chaparral can range from low, monotonous, smooth-textured vegetation to more heterogeneous stands approaching the vertical structure of woodlands.

Chaparral generally is thought to be a fire-dependent system, based on the many adaptations of its characteristic species, and its resilience in form and species composition to periodic burning. Most of the characteristic shrub species in chaparral can be organized into three adaptive strategies related to fire: (1) shrubs that have stems that regenerate following fire from below ground burls (resprouters); (2) shrubs that produce large amounts of dormant seed that persist for long periods of time and germinate by heat or chemical processes initiated by fire (obligate seeders); and (3) plants that apply both strategies.

The abundance and diversity of wildlife in California's chaparral is not commonly recognized. Chaparral habitat supports nearly 50 species of mammals, but none live exclusively in chaparral. Some are found primarily in mature chaparral and others in young chaparral and along ecotones between chaparral and other plant communities. Several prefer riparian areas in and near chaparral. Predators in California's chaparral include mountain lions (*Puma concolor*), bobcats (*Lynx rufus*) and coyotes (*Canis latrans*). These predators prey on black-tailed deer (*Odocoileus hemionus columbianus*), rabbits and ground squirrels. Although many bird species travel over and through the chaparral, only a few reside year-round. Common birds in chaparral ecosystems include the wrentit (*Chamaea fasciata*), Western Scrub Jay (*Aphelocoma californica*), California towhee, (*Melospiza crissalis*), spotted towhee (*Pipilo maculatus*) and California thrasher (*Toxostoma redivivum*). Birds especially common in chaparral for several years after a fire include Costa's hummingbird (*Calypte costae*), sage sparrow (*Artemisiospiza belli*), rufous-crowned sparrow (*Aimophila ruficeps*), lazuli bunting (*Passerina amoena*), and Lawrence's goldfinch (*Carduelis lawrencei*).

2. *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance was observed within small portions of the project buffer area along the existing access road to the tower site. Common species found in this community were composed of introduced grasses and broadleaf weedy species, which quickly re-colonize disturbed areas.

Grasslands support a variety of mammals, birds, and reptiles, and provide foraging habitat for raptors. Many species use the grassland for only part of their habitat

requirements, foraging in the grassland and seeking cover in surrounding tree and scrub cover. Grassland cover provides foraging, nesting, and denning opportunities for resident species such as western fence lizard (*Sceloporus occidentalis*), northern alligator lizard (*Elgaria coerulea*), gopher snake (*Pituophis melanoleucus*), western meadowlark (*Sturnella neglecta*), goldfinch (*Carduelis tristis*), ring-necked pheasant (*Phasianus colchicus*), red-winged blackbird (*Agelaius phoeniceus*), California ground squirrel (*Spermophilus beecheyi*), California vole (*Microtus californicus*), pocket gophers (*Thomomys* spp.), black-tailed jackrabbit (*Lepus californicus*), and occasionally black-tailed deer (*Odocoileus hemionus columbianus*).

The rodent, bird, and reptile populations offer foraging opportunities for avian predators such as the northern harrier hawk (*Circus cyaneus*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), golden eagle (*Aquila chrysaetos*), barn owl (*Tito alba*), and great horned owl (*Bubo virginianus*). Mammalian predators which utilize grasslands include gray fox (*Urocyon cinereoargenteus*) and long-tailed weasel (*Mustela frenata*).

3. Ruderal-disturbed vegetation was observed within the disturbed areas of the existing access road that will be improved, as well as other existing access roads that will be used for access to the project site. This vegetation type is comprised mostly of non-native weedy herbaceous forb plants.

2.0 Methods

The proposed project site and buffer area were previously surveyed for sensitive botanical species on December 8, 2023. The findings of these surveys were discussed in the biological resources assessment report, dated December 2023. No sensitive plant species were identified during these studies.

Study methods for this survey included a literature review to determine special status plant species that could potentially occur within areas influenced by the construction of and operation/maintenance of the project. The review consisted of a search of the CNDDDB (CDFW 2025) and the CNPS Online Inventory (CNPS 2025) for all rare plants occurring within the project site and buffer area. For the purpose of this study, rare plants were defined as those species that are: 1) listed, proposed or under review as rare, threatened or endangered under the Federal Endangered Species Act or California Endangered Species Act; 2) considered rare or endangered by CNPS, including watch list species. A list of target species is included in Table 1.

A botanical survey of the project site and buffer area for special status plant species was conducted by Mr. Cord Hute on April 11 and May 29, 2025. These surveys were floristic in nature and were completed concurrent with surveys to detect sensitive wildlife species. Surveys were conducted in accordance with the USFWS *Guidelines for Conducting and Reporting Botanical Inventories for*

Federally Listed, Proposed, and Candidate Plants (USFWS 2000) and the CDFW *Protocols for Surveying and evaluating impacts to special-status native plant populations and natural communities* (CDFW 2025). Rare plant surveys were also performed using demographic survey techniques derived from the CNPS rare plant monitoring guidelines (CNPS 2025). These guidelines include conducting floristically based surveys, identifying all plants encountered to the species level, or identifying to the level necessary to detect rare plants if present. The survey was conducted during the correct phenological time to detect targeted special status plants.

Biologists surveyed 20 to 30 feet wide transects within the proposed project site and the 500-foot radius buffer area. Biologists identified vascular plant species encountered in the surveys using standard manuals (Hickman 1996). Scientific nomenclature used for plant species in this report follows Hickman (1996) and biologists used *A Manual of California Vegetation* (Sawyer, J., T. Keeler-Wolf and J. Evens. 2025) to describe habitat types found in the proposed project site and buffer area. Animal species observed during biological surveys are listed in Table 2. Plant species identified are discussed in the text of the report.

28 special-status plant species were identified as having potential to occur within the proposed project site and buffer area (see Table 1 below). A species was included as having potential to occur based on a combination of suitable habitat presence, and previously known occurrences in the area. All botanical species encountered on the project were recorded, a list of these species is provided in Section 5.

Table 1. Target Species for special-status plant survey.

COMMON NAME	SCIENTIFIC NAME	Federal Status	California Status	HABITAT PREFERENCE
Bent-flowered fiddleneck	<i>Amsinckia lunaris</i>	-	List 1B.2	Coastal bluff scrub, cismontane woodland, and valley and foothill grassland. Blooms March to June. Elevation: 3-500 m.
Twig-like snapdragon	<i>Antirrhinum virga</i>	-	List 4.3	Chaparral and lower montane coniferous forest. Blooms June to July. Elevation: 100-2,015 m.
Konocti manzanita	<i>Arctostaphylos Manzanita ssp. elegans</i>	-	List 1B.3	Chaparral, cismontane woodland, and lower montane coniferous forest. Blooms January to July. Elevation: 225-1,830 meters.
Raiche's manzanita	<i>Arctostaphylos stanfordiana ssp. raichei</i>	-	List 1B.1	Chaparral and lower montane coniferous forest. Blooms February to April. Elevation: 485 – 1,070 m.
Serpentine milkweed	<i>Asclepias solanoana</i>	-	List 4.2	Chaparral, cismontane woodland, and lower montane coniferous forest. Blooms May to August. Elevation: 230-1,860 m.
Cleveland's milk-vetch	<i>Astragalus clevelandii</i>	-	List 4.3	Chaparral, cismontane woodland, and riparian forest. Blooms June to September. Elevation: 200-1,500 m.
Jepson's milk-vetch	<i>Astragalus rattanii var. jepsonianus</i>	-	List 1B.2	Chaparral, cismontane woodland, and valley and foothill grassland. Blooms March to June. Elevation: 295-700 m.
Four-petaled pussypaws	<i>Calyptidium quadripetalum</i>	-	List 4.3	Chaparral and lower montane coniferous forest. Blooms April to June. Elevation: 315-2,040 m.
Tracy's clarkia	<i>Clarkia gracilis ssp. tracyi</i>	-	List 4.2	Chaparral. Blooms April to July. Elevation: 65-650 m.

COMMON NAME	SCIENTIFIC NAME	Federal Status	California Status	HABITAT PREFERENCE
Serpentine collomia	<i>Collomia diversifolia</i>	-	List 4.3	Chaparral and cismontane woodland. Blooms May to June. Elevation: 200-600 m.
Serpentine bird's-beak	<i>Cordylanthus tenuis ssp. brunneus</i>	-	List 4.3	Chaparral, closed-cone coniferous forest, and cismontane woodland. Blooms July to August. Elevation: 305-915 m.
Swamp larkspur	<i>Delphinium uliginosum</i>	-	List 4.2	Chaparral, valley and foothill grassland. Blooms May to June. Elevation: 340-610 m.
Brandegee's eriastrum	<i>Eriastrum brandegeae</i>	-	List 1B.1	Chaparral and cismontane woodland. Blooms April to August. Elevation: 410-845m.
Tripod buckwheat	<i>Eriogonum tripodum</i>	-	List 4.2	Chaparral and cismontane woodland. Blooms May to July. Elevation: 200-1,600 m.
St. Helena fawn lily	<i>Erythronium helenae</i>	-	List 4.2	Chaparral, cismontane woodland, lower montane coniferous forest, and valley and foothill grassland. Blooms March to May. Elevation: 350-1,220 m.
Adobe-lily	<i>Fritillaria pluriflora</i>	-	List 1B.2	Chaparral, cismontane woodland, and valley and foothill grassland. Blooms February to April. Elevation: 60-705 m.
Purdy's fritillary	<i>Fritillaria purdyi</i>	-	List 4.3	Chaparral, cismontane woodland, and lower montane coniferous forest. Blooms March to June. Elevation: 175-2,255 m.
Hall's harmonia	<i>Harmonia hallii</i>	-	List 1B.2	Chaparral on serpentine hills and ridges. Elevational range: 335 – 930 meters. Blooming period: April to June.
Mendocino tarplant	<i>Hemizonia congesta ssp. calyculata</i>	-	List 4.3	Cismontane woodland and valley and foothill grassland. Blooms July to November. Elevation: 225-1,400 m.
Two-carpellate western flax	<i>Hesperolinon bicarpellatum</i>	-	List 1B.2	Chaparral on serpentine barrens. Elevational range: 180 – 825 meters. Blooming period: May to July.
Sharsmith's western flax	<i>Hesperolinon sharsmithiae</i>	-	List 1B.2	Chaparral. Blooms May to July. Elevation: 270-300 m.
Bolander's horkelia	<i>Horkelia bolanderi</i>	-	List 1B.2	Lower montane coniferous forest, chaparral, meadows, seeps, valley and foothill grassland. Elevational range: 455 – 855 meters. Blooming period: May to August.
California satintail	<i>Imperata brevifolia</i>	-	List 2B.1	Chaparral, coastal scrub, Mojavean desert scrub, meadows, seeps, and riparian scrub. Blooms September to May. Elevation: 0-1,215 meters.
Colusa layia	<i>Layia septentrionalis</i>	-	List 1B.2	Found in chaparral, cismontane woodland, valley and foothill grassland. Elevational range: 100 to 1095 meters. Blooming period: April through May.
Bristly leptosiphon	<i>Leptosiphon acicularis</i>	-	List 4.2	Found in chaparral, cismontane woodland, coastal prairie, and valley and foothill grassland. Elevational range: 55 to 1,500 meters. Blooming period: April through July.
Hoover's lomatium	<i>Lomatium hooveri</i>	-	List 4.3	Chaparral and cismontane woodland. Blooms April to July. Elevation: 300-885 m.
Napa lomatium	<i>Lomatium repostum</i>	-	List 4.2	Broadleaved upland forest, chaparral, and cismontane woodland. Blooms March to June. Elevation: 90-1,440 m.
Oval-leaved viburnum	<i>Viburnum ellipticum</i>	-	List 2B.3	Found in chaparral, cismontane woodland, and lower montane coniferous forest. Elevational range: 215 to 1,400. meters. Blooming period: May through June.

*Status is defined as any plant listed or under review as rare or threatened under the endangered species act, or considered rare or endangered by California Native Plant Society.

Status Codes:

Federal

FE = Federally listed as Endangered
 FT = Federally listed as Threatened
 FC = Federal Candidate species

State

CE = California listed as Endangered
 CT = California listed as Threatened
 CR = California listed as Rare
 CFP = California Fully Protected
 CSC = Species of Special Concern
 WL = CDFW Watch List
 FP = Fully Protected

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 2025) and California Native Plant Society, California Rare Plant Electronic Inventory (CNPS 2025).

3.0 Results

3.1 Special Status Plants

No targeted special-status plant species identified in Table 1 were observed in the study area during the botanical surveys. Common plant species observed during field surveys are listed in Section 5 of this report. Our botanical surveys were conducted during the appropriate flowering season for all identified sensitive plant species. As long as project activities are confined to the proposed project site, we do not recommend further surveys or protection measures to protect these plant species. However, we do recommend implementation standard best management measures as described in Section 4.

4.0 Recommendations

4.1 Special-Status Plants

Synthesis Planning, Inc. recommends the following measures be implemented prior to and during the implementation of project construction activities:

- Environmental Awareness Training shall be presented to all personnel working in the field on the proposed project sites. Training shall consist of a brief presentation in which biologists knowledgeable of threatened, endangered, and special-status species biology and legislative protection shall explain sensitive species concerns. Training shall include a discussion of special-status plants and sensitive wildlife species. Species biology, habitat needs, status under the Federal and State Endangered Species Act, and measures being incorporated for the protection of these species and their habitats shall also be discussed.
- Project site boundaries shall be clearly delineated by stakes and /or flagging to minimize inadvertent degradation or loss of adjacent habitat during project site preparation and construction operations. Staff and/or its contractors shall post signs and/or place fence around the proposed project site to restrict access of vehicles and equipment unrelated to project operations.
- A project representative shall establish restrictions on project-related traffic to approved project areas, storage areas, staging and parking areas via signage. Off-road traffic outside of designated proposed project site shall be prohibited.

- Hazardous materials, fuels, lubricants, and solvents that spill accidentally during project-related activities shall be cleaned up and removed from the project as soon as possible according to applicable federal, state and local regulations.
- All equipment storage and parking during site development and operation shall be confined to the proposed project sites.

5.0 Plant Species Observed in the Project Study Area

The following is a list of plant species observed within the project study area during special-status plant surveys:

Common Name (Scientific Name)

Chamise (*Adenostoma fasciculatum*)
 Fiddleneck (*Amsinckia menziesii* var. *intermedia*)
 Pointleaf manzanita (*Arctostaphylos pungens*)
 Slender wild oat (*Avena barbata*)
 Black mustard (*Brassica nigra*)
 Rattlesnake grass (*Briza maxima*)
 Harvest brodiaea (*Brodiaea elegans*)
 California brome (*Bromus carinatus carinatus*)
 Ripgut grass (*Bromus diandrus*)
 Soft chess (*Bromus hordeaceus*)
 Smooth brome (*Bromus inermis*)
 Red brome (*Bromus rubens*)
 Sego lily (*Calochortus nuttallii*)
 Buckbrush ceanothus (*Ceanothus cuneatus*)
 Yellow star-thistle (*Centaurea solstitialis*)
 California mountain mahogany (*Cercocarpus betuloides*)
 Dove weed (*Croton setigerus*)
 Bristly dogstail-grass (*Cynosurus echinatus*)
 Scotch broom (*Cytisus scoparius*)
 Squirrel tail grass (*Elymus elymoides*)
 California yerba santa (*Eriodictyon californicum*)
 Common woolly sunflower (*Eriophyllum lanatum*)
 Broadleaf filaree (*Erodium botrys*)
 Red-stem filaree (*Erodium cicutarium*)
 California poppy (*Eschscholzia californica*)
 Fennel (*Foeniculum vulgare*)
 California holly (*Heteromeles arbutifolia*)
 Bearstem biscuit root (*Lomatium nudicaule*)
 Common mallow (*Malva neglecta* Wallr.)
 Cheeseweed (*Malva parviflora*)
 Purple needlegrass (*Nassella pulchra*)
 Bristly ox tongue (*Picris echioides*)
 Gray pine (*Pinus sabiniana*)
 English plantain (*Plantago lanceolata*)
 Common plantain (*Plantago major*)
 Blue oak (*Quercus douglasii*)

Interior live oak (*Quercus wislizeni*)
Radish (*Raphanus sativus*)
Dandelion (*Taraxacum officinale*)
Tocalote (*Centaurea melitensis*)
Poison-oak (*Toxicodendron diversilobum*)
Rat's-tail fescue (*Vulpia myuros*)

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Attachment A

Site Photos



Proposed tower site. View looking northeast.



Proposed tower site. View looking northwest.



Proposed tower site. View looking southwest.



Existing access road to proposed tower site. View looking southeast.



Existing access road to proposed tower site. View looking north.



Existing access road to proposed tower site. View looking northeast.

Attachment B

Project Figures

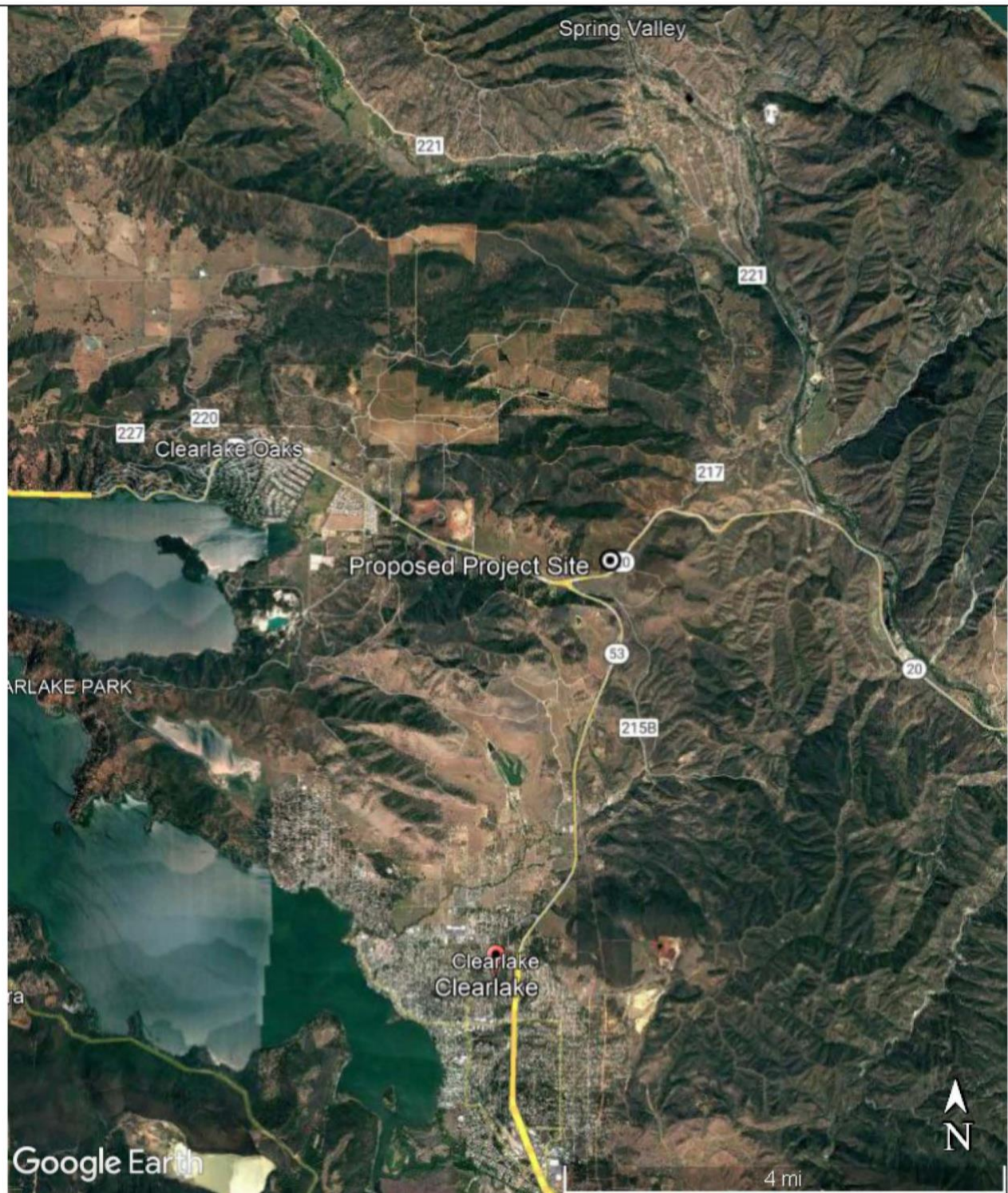


Figure 1. Project Vicinity Map

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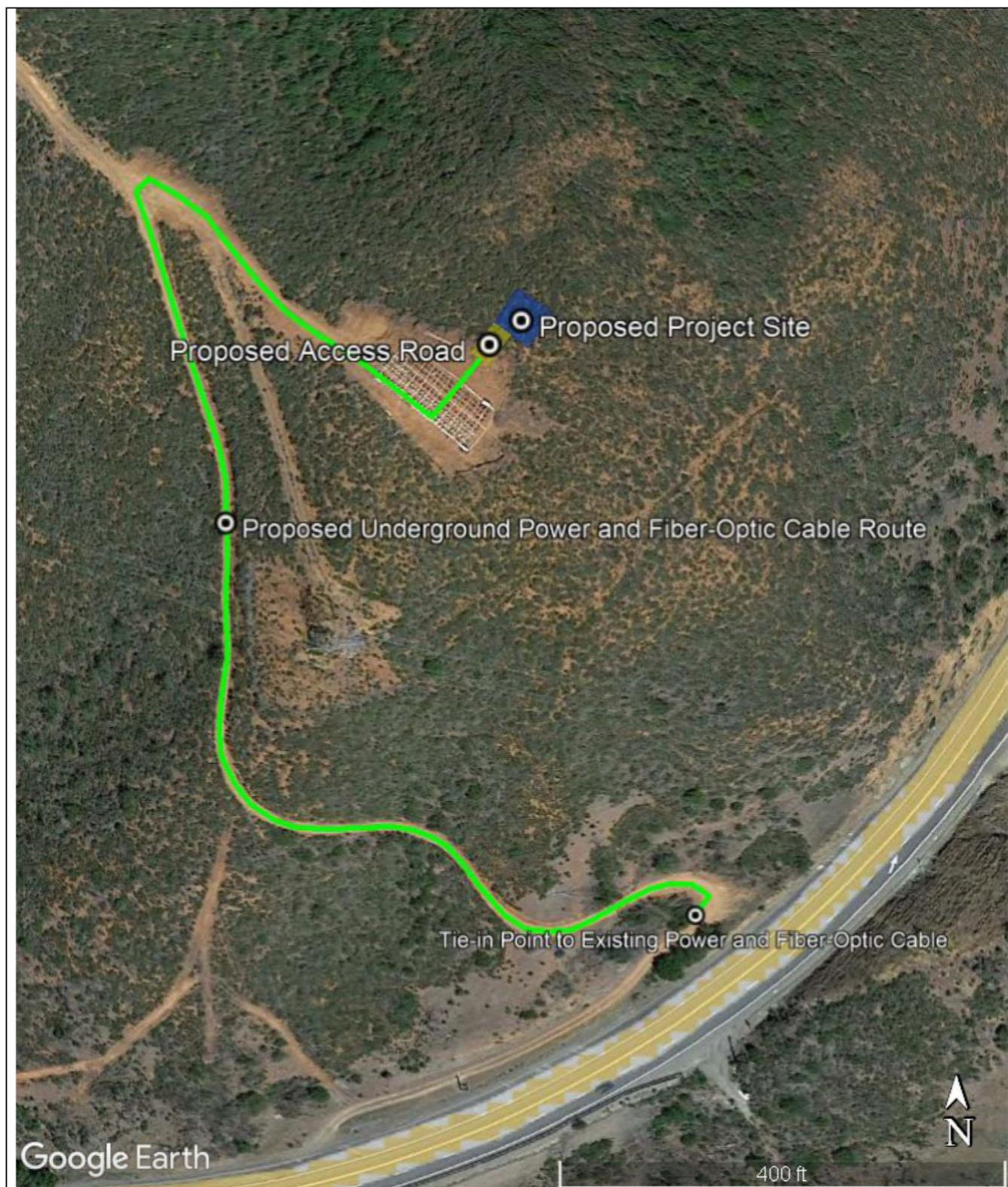


Figure 2. Project Location Map

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Figure 3. CNDDDB Species Occurrences in the Vicinity of the Project Site

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