Appendix C:
Biological Resources Supporting Information

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BIOLOGICAL RESOURCES REPORT
GIOVANNONI LOGISTICS CENTER
AMERICAN CANYON, CALIFORNIA

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TABLE OF CONTENTS

LIST OF ATTACHMENTS

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1.0 INTRODUCTION

On behalf of Buzz Oates Construction, Inc., Huffman-Broadway Group, Inc. (HBG) has prepared a Biological Resources Report for the Giovannoni Logistics Center Project in the City of American Canyon, California. The approximately 207.8-acre Giovannoni Logistics Center Project (Project Site), also referred to as the Study Area, is located in the northwestern portion of the City of American Canyon, Napa County, California. It is expected that this Biological Resources Report will be used in decision-making with respect to the documentation necessary for the project pursuant to the California Environmental Quality Act (CEQA).

The applicant, Buzz Oates Construction, Inc., is proposing to develop an approximately 2.4 million square foot logistics center and a wetland preserve as open space on approximately 199.5 acres out of the 207.8-acre Project Site. The Devlin Road and Vine Trail Extension Project is currently being developed by the City of American Canyon on the remaining 8.3 acres of the 207.8-acres Project Site. . The applicant has developed site design-level plans for the Giovannoni Logistics Center Project on approximately 113.6 acres of the Project Site. These site-design level plans include development on the approximately 68.8 acre area east of the Devlin Road extension and wetland mitigation plans on an approximately 44.8 acre Wetland Preserve (together referred to herein as the "Project"). The development on the 68.8 areas will support two high cube warehouse buildings totaling 1,069,904 squarefeet. Buildings A would be rail-served by the adjacent Napa Branch Line. Each building would provide docks, grade level roll up doors, and trailer parking stalls. The facility would be enclosed with a secure perimeter and access would be restricted to authorized users. The approximately 44.8 acre wetland preserve will be used to offset wetland impacts associated with the Project, and additional wetland impacts that may occur in the future as part of the possible development of a second phase of the project (referred to herein as the "Phase 2"). If built out, Phase 2 is anticipated to encompass the approximately 85.9-acre area west of Devlin Road and is conceptually proposed to develop the remaining 1.3 million square feet of high cube warehouse space. This Phase 2 project, if constructed, would commence sometime after the proposed Project is completed.

Accordingly, the City of American Canyon's environmental review process pursuant to CEQA will evaluate the proposed project east of Devlin Road with a Project Specific Level of analysis and the second phase west of Devlin Road at a Program Level. The analysis for the proposed Project is independent from the Giovannoni Logistics Center Project Phase 2 (referred to herein as "Phase 2"). When and if Phase 2 moves forward, an addendum to the EIR will need to be conducted and Phase 2 will be re-evaluated based on the specifics and any new environmental or CEQA issues that will need to be assessed.

The objective of this study was to provide a determination of the potential for the Study Area (the entire 207.8-acre Project Site) to support sensitive habitats as defined by state or federal regulation and/or pursuant to the California Environmental Quality Act (CEQA) or for the Study Area to support special status species of flora and fauna. This evaluation also includes an

evaluation to determine whether the proposed construction would result in impacts to sensitive habitats or special status species, recommends mitigation measures necessary to mitigate impacts to levels of insignificance as defined by CEQA, and identifies needs for regulatory permits from state and federal agencies.

HBG's analysis included a review of pertinent literature on habitat characteristics of the site, including species of plants and animals expected to utilize the Project Site and a review of planning documents referencing ecological aspects of the site. These documents included previously prepared biological studies pertaining to the site, including an aquatic resources delineation prepared by Monk & Associates (2016) and surveys for federally listed vernal pool brachiopods conducted by LSA Associates (2016) and Monk & Associates (2017). HBG's work included a Habitat Assessment for the federally listed threatened California red-legged frog prepared by Dr. Mark Jennings, and rare plant surveys, currently underway, by Dr. Brent Helm during the 2021 flowering season.

Also relevant to the biological evaluation were Biological Resource Reports prepared by Monk & Associates for two separate Initial Study/Mitigated Negative Declarations prepared by the City of American Canyon for projects with shared elements to the subject project. These include Biological Resource Reports for the Devlin Road and Vine Trail Extension Project (Monk & Associates 2018) (currently being constructed by the City of American Canyon on 8.3 acres of the Giovannoni Project Site) and the Green Island Road Reconstruction and Widening Project (Monk & Associates 2019).. HBG's work also included an updated review of the California Natural Diversity Data Base (CNDDB) to determine if populations of endangered, threatened, or rare species have occurred on the site historically or are currently known to exist in the project vicinity and included additional field surveys of the site conducted by HBG biologists between December 2020 and April 2021. Additional field reviews will be conducted during the spring and summer of 2021 for the purpose of completing rare plant surveys within the Study Area.

2.0 PROPOSED PROJECT

2.1 Project Location

The 207.8-acre Project Site is located in the northwestern portion of the City of American Canyon, Napa County, California. A regional location map for the Project Site is shown in Figure 1 and the area in the vicinity of the site is shown in Figure 2. The semi-rectangular Project Site is bounded by industrial development in the Green Island Business Park to the west, the Napa Logistics Project and Devlin Road to the north, the Napa Branch Line of the Southern Pacific Railroad to the east, and Green Island Road, a stone supply business, and a wine distribution warehouse to the south. State Highway 29 is located just to the east of the site and the Napa River is less than one mile to the west.

Figure 3 shows the location of the Project Site on the Cuttings Wharf, California, United States Geological Survey 7.5-minute topographic quadrangles, Township 4 North, Range 4 West, Sections 13 and 14 (Latitude 38° 11' 50" North; Longitude 122° 15' 36" West). An aerial image of the Project Site with the US Army Corps of Engineers (USACE) verified wetlands is provided on Figure 4.

2.2 Project Description

2.2.1 Land Use Activities and Designations

The 207.8-acre Project Site is currently undeveloped land and is the largest undeveloped site in the City of American Canyon. The Project Site has sat vacant for decades with the City of American Canyon annexing the property into the City in 2005. The Project Site gently slopes from east to west with an elevation ranging from 35 feet to 50 feet above mean sea level. The West Napa Fault bisects the Project Site in a northwest/southeast direction. The Project Site is designated "Industrial" by the City of American Canyon General Plan and zoned "General Industrial" and is within the boundaries of the Napa County Airport Land Use Compatibility Plan.

The City of American Canyon is currently constructing an extension of Devlin Road bisecting the Project Site[1]. The Devlin Road and Vine Trail Extension project extends approximately 2,800 linear feet from Green Island Road to a completed segment of Devlin Road within the Napa Logistics Park, closing a gap in the City's roadway network. The extension is contemplated by the City of American Canyon General Plan Circulation Element as an Industrial Collector. The extended Devlin Road will be a two-lane roadway with a walking trail, box culvert, and bioretention cells. An extension of the Napa Valley Vine Trail is a component of the Devlin Road extension. Construction of the Devlin Road and Vine Trail Extension project began in the spring of 2021with completion anticipated by the end of 2021..

[1] The Devlin Road extension will encompass approximately 8.3-acres of the 207.8-acre Project Site.

An additional related but separate project by the City of American Canyon is the Green Island Road Reconstruction and Widening Project. Green Island Road would be widened and a new Green Island Road/Devlin Road intersection with turn lanes would be constructed. Anticipated start of construction is 2022.

2.2.2 Proposed Project

The applicant, Buzz Oates Construction, Inc., is proposing to develop an approximately 2.4 million square foot logistics center and a wetland preserve as dedicated open space on approximately 199.5 acres out of the 207.8-acre Project Site. In conjunction with the proposed Project, the City of American Canyon is currently constructing an extension of Devlin Road that will encompass approximately 8.3-acres of the 207.8-acre overall Project Site.
The applicant has developed site design-level plans on the approximately 68.8 acre area east of the Devlin Road extension and wetland mitigation plans on an approximately 44.8 acre Wetland Preserve for a 113.6 acre Project. These site design-level plans for 68.8-acre the portion of the site east of Devlin Road along with the approximately 44.8-acre Wetland Preserve are shown in Figure 5. Building A will have 36' in clearance height and provide 601,383 ground square feet (GSF). Building A will be rail-served by the adjacent Napa Branch Line and equipped with 126 dock positions, 4 grade level roll up doors, 215 trailer parking stalls 12'x55', and 432 vehicle stalls. Building B will have 36' in clearance height and provide 468,521 GSF. Building B will be equipped with 100 dock positions, 4 grade level roll up doors, 148 trailer parking stalls 12'x55', and 442 vehicle stalls. The facility would be enclosed with a secure perimeter and access would be restricted to authorized users.

A Phase 2 project, anticipated on the 85.9-acre area west of Devlin Road, is conceptually proposed for the remaining 1.3 million square feet of high cube warehouse. This Phase 2 project would commence sometime after the proposed Project is completed. The conceptual plan for development area of this Phase 2 in the portion of the site west of Devlin Road is shown in Figure 6. If and when Phase 2 is pursued, work would commence once the proposed Project is completed. Accordingly, the environmental review process conducted by the City of American Canyon pursuant to CEQA will evaluate the proposed Project at a Project Specific level of analysis and Phase 2 at a Program level.

Driveway access to the proposed Project and Phase 2 would be taken from Devlin Road and Green Island Road.

A summary of land uses for the entire Project Site is shown in Table 1.

Table 1. Land Uses for 207.8-acres Project Site			
Phase / Land Use	**Acres**	**Building / Square Feet**	**End Use / Characteristics**
Project (Site Design Level Plans)	68.8	A / 601,383	High Cube Warehouse / 36 feet clear height
		B / 468,521	High Cube Warehouse / 36 feet clear height
	44.8	NA	Wetland Preserve: Will be used to fully mitigate for wetland impacts associated with the Project and to fully, or in part, mitigate for wetland impacts associated with Phase 2.
Phase 2 (Program Level)	85.9	1.3 million	High Cube Warehouse
Devlin Road Extension	8.3	NA	Implemented by City of American Canyon
Total	**207.8**	**2.4 million**	**NA**
Note: Acreage and square footage calculations sourced from CBG Civil Engineers.			

As part of the Project, an approximately 44.8-Acre Wetland Preserve fronting the northern boundary will be preserved, and the preservation site will be used to create approximately 0.992-acre of wetlands (2:1 ratio) to offset wetland impacts associated with the Project, and an additional approximately 3.7-acres of wetlands (1:1 ratio) will be created to offset wetland impacts that may occur in the future as part of Phase 2, assuming Phase 2 is built out. The Conceptual Wetland Mitigation Plan and associated map for the general location of mitigation wetlands in relation to the Project Site and existing wetlands is discussed in detail in Section 5. The Wetland Preserve would create a contiguous open space area with the adjoining 37-acre Napa Logistics Park Wetland Preserve. Figure 5 shows the plans for site-design level development of the proposed Project east of Devlin Road; conceptual plans for future development of Phase 2 west of Devlin Road are shown on Figure 6. An approximately 44.8-acre Wetland Preserve will protect existing seasonal wetlands and vernal pools, protect foraging habitat for raptors, and support established wetlands to offset wetland impacts associated with the Project and Phase 2.

The proposed Project and Phase 2 requires a Use Permit, Tentative Parcel Map, Design Permits, and a Lot Line Adjustment from the City of American Canyon.

3.0 REGULATORY BACKGROUND

The following is a description of federal, state, and local environmental laws and policies that are relevant to the California Environmental Quality Act (CEQA) review process.

3.1 Federal Regulations

Clean Water Act-Section 404

The U.S. Army Corps of Engineers (USACE or Corps) regulates discharges of dredged or fill material into Waters of the United States under Section 404 of the Clean Water Act (CWA). "Discharge of fill material" is defined as the addition of fill material into Waters of the U.S., including but not limited to the following: placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for its construction; site-development fills for recreational, industrial, commercial, residential, and other uses; causeways or road fills; and fill for intake and outfall pipes and sub-aqueous utility lines (33 C.F.R. §328.2(f)). In addition, Section 401 of the CWA (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into Waters of the United States to obtain a certification that the discharge will comply with the applicable effluent limitations and water quality standards.

The USACE and the U.S. Environmental Protection Agency (US EPA) are responsible for implementing the Section 404 program. Section 404(a) authorizes the Corps to issue permits, after notice and opportunity for comment, for discharges of dredged or fill material into waters of United States (WOTUS). Section 404(b) requires that the Corps issue permits in compliance with EPA guidelines, which are known as the Section 404(b)(1) Guidelines. Specifically, the Section 404(b) (1) guidelines require that the Corps only authorize the "least environmentally damaging practicable alternative" (LEDPA) and include all practicable measures to avoid and minimize impacts to the aquatic ecosystem. The guidelines also prohibit discharges that would cause significant degradation of the aquatic environment or violate state water quality standards.

Waters of the U.S. include both wetlands and "other waters of the U.S." Wetlands and other waters of the U.S. are described by US EPA and Corps regulations (40 CFR § 230.3(s) and 33 CFR § 328.3(a), respectively). US EPA and the Corps define wetlands as "…those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (US EPA regulations at 40 CFR § 230.3(t); Corps' regulations at 33 CFR § 328.3(b)). Both natural and manmade wetlands and other waters (not vegetated by a dominance of rooted emergent vegetation) are subject to regulation. Waters of the U.S. include a range of wet environments such as lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, and wet meadows.

The geographic extent of wetlands is defined by the collective presence of a dominance of wetland vegetation, wetland hydrology conditions, and wetland soil conditions as determined following the Corps' 1987 Wetlands Delineation Manual (1987 Manual); the Corps' 2008 Regional Supplement to Corps of Engineers Wetland Delineation Manual: Arid West, Version 2.0 (Arid West Regional Supplement); and supporting guidance documents. The geographic extent of other waters of the U.S. is defined by an ordinary high-water mark (OHWM) in non-tidal waters (33 CFR. §328.3(e)) and by the High Tide Line within tidal waters (33 CFR. §328.3(d)). The OHWM is defined by the Corps as "that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" (33 C.F.R. §328.3(e)). Tidal waters are also under the jurisdiction of the Corps. The landward limits of jurisdiction in tidal waters extend to the high tide line…"or, when adjacent non-tidal waters of the United States are present, to the limits of jurisdiction for such non-tidal waters" (33 C.F.R.§328.4(b)) High tide is further defined to include the line reached by spring high tides and other high tides that occur with periodic frequency (33 C.F.R.§328.3(d)).

SWANCC and Rapanos. In the U.S. Supreme Court decision *Solid Waste Agency of Northern Cook County v. United States Army Corps of Engineers (SWANCC), No. 99-1178 (2001),* some isolated wetlands may be excluded from the Corps' Section 404 jurisdiction because they are (1) non-tidal, (2) non-navigable, (3) not hydrologically connected to navigable waters or adjacent to such waters, and (4) not subject to foreign or interstate commerce. Subsequent to SWANCC, the U.S. Supreme Court decided on *Rapanos v. United States* and *Carabell v. United States*, 126 U.S. 2208 (2006) (herein referred to as Rapanos) which resulted in 2007, guidance was given to US EPA regions and Corps districts to implement the Supreme Court's decision which addresses the jurisdiction over waters of the U.S. under the Clean Water Act. The Rapanos guidance requires the Corps to conduct detailed analysis of the functions and values of wetlands and other waters of the U.S. potentially onsite and in some cases offsite, to determine if there is a nexus to traditional navigable waters and to evaluate the significance of the nexus to the traditional navigable water. Neither the Court nor the recently-issued guidance draw a clear line with respect to the geographic reach of jurisdiction, particularly in drainages where flows are ephemeral and where wetlands are adjacent to but not directly abutting relatively permanent water.

Navigable Waters Protection Rule. In 2020, the Trump Administration obtained approval of the Navigable Waters Protection Rule (NWPR) that altered the reach of the nation's Clean Water Act. The NWPR has four categories of jurisdictional waters and twelve categories of excluded waters/features. There is no standalone interstate waters category and no case-specific significant nexus analysis. Key changes were made for defining tributary, adjacent wetland, ditches, lakes, ponds, and impoundments. New definitions for defining typical year versus normal, perennial, intermittent, ephemeral, snowpack, and ditches. No change was made to the definition of wetlands or the methodology for defining wetlands. Under the NWPR, WOTUS

includes 1) territorial seas and traditional navigable waters; 2) tributaries; 3) lakes and ponds, and impoundments of jurisdictional waters; and 4) adjacent wetlands.

Clean Water Act-NPDES Requirements

In 1972, the Clean Water Act was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with a National Pollution Discharge Elimination System (NPDES) permit. The 1987 amendments established a framework for regulating municipal, industrial, and construction-related storm water discharges under the NPDES Program. On November 16, 1990, the US EPA published final regulations that establish storm water permit application requirements for specified categories of industries. The regulations provide that discharges of storm water from construction projects that encompass one or more acres of soil disturbance are effectively prohibited unless the discharge is in compliance with an NPDES Permit.

The California State Water Resource Control Board has developed a general construction storm water permit to implement the requirements for the federal NPDES permit. The permit requires submittal of a Notice of Intent to comply, fees, and the implementation of a Storm Water Pollution Prevention Plan that specifies Best Management Practices (BMPs) that will prevent construction pollutants from entering storm water and keep products of erosion from migrating off-site into downstream receiving waters. The Construction General Permit includes post-construction requirements that site design provide no increase in overall site runoff or the concentration of drainage pollutants and requires implementation of Low Impact Development ("LID") design features. The Construction General Permit is implemented and enforced by California's nine Regional Water Quality Control Boards.

The State Regional Water Quality Control Boards (SWQCB) have also adopted requirements for NPDES storm water permits for medium and large municipalities, and the State Water Resources Control Board has adopted a General Permit for the discharge of storm water from small municipal storm sewer systems. This General Permit requires projects to develop and implement a post-construction Storm Water Management Plan (SWMP) to reduce the discharge of pollutants to the maximum extent practicable.

Federal Endangered Species Act

The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. The FESA is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend. The FESA establishes an official listing process for plants and animals considered to be in danger of extinction, requires development of specific plans of action for the recovery of listed species, and restricts activities perceived to harm or kill listed species or affect critical habitat (16 USC 1532, 1536).

The FESA prohibits the "take" of endangered or threatened wildlife species. "Take" is defined as harassing, harming (including significantly modifying or degrading habitat), pursuing, hunting,

shooting, wounding, killing, trapping, capturing, or collecting wildlife species, or any attempt to engage in such conduct (16 USC 1532, 50 CFR 17.3). Taking can result in civil or criminal penalties. Federal regulation 50 CFR 17.3 further defines the term "harm" in the take definition to mean any act that actually kills or injures a federally listed species, including significant habitat modification or degradation. Additionally, FESA prohibits the destruction or adverse modification of designated critical habitat. In the Service's regulations at 50 CFR 402.2, destruction or adverse modification is defined as a "direct or indirect alteration that appreciably diminishes the value of critical habitat for both the survival and recovery of a listed species.

The ESA also requires federal agencies to ensure that their actions do not jeopardize the continued existence of listed species or adversely modify critical habitat (16 USC 1536). Therefore, the ESA is invoked when the property contains a federally listed threatened or endangered species that may be affected by a permit decision. In the event that listed species are involved and a Corps permit is required for impacts to jurisdictional waters, the Corps must initiate consultation with US Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service, (NMFS) pursuant to Section 7 of the ESA (16 USC 1536; 40 CFR § 402). If formal consultation is required, USFWS or NMFS will issue a biological opinion stating whether the permit action is likely to jeopardize the continued existence of the listed species, recommending reasonable and prudent measures to ensure the continued existence of the species, establishing terms and conditions under which the project may proceed, and authorizing incidental take of the species.

For discretionary permit actions by non-federal entities, Section 10 of the ESA provides a mechanism for obtaining take authorization through submittal and approval of a Habitat Conservation Plan that details species impacts, measures to minimize or mitigate such impacts, and funding mechanisms to implement mitigation requirements.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements international treaties devised to protect migratory birds and any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. The regulations governing migratory bird permits are in 50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits. Most bird species within California fall under the provisions of the Act. Excluded species include nonnative species such as house sparrow, starling, and ring-necked pheasant and native game species such as quail.

On December 22, 2017, the U.S. Department of Interior's Office of the Solicitor issued Memorandum M-37050, which states an interpretation that the Migratory Bird Treaty Act does not prohibit the accidental or "incidental" taking or killing of migratory birds. In response to the Trump Administration's attempted changes to the MBTA, eight states, including California, filed suit in September of 2018, arguing that the new interpretation inappropriately narrows the MBTA and should be vacated. On August 11, 2020, the Southern District of New York ruled in

favor of the long-standing interpretation of the MBTA to protect migratory birds, reinstating the historical ban on incidental take. Just days before leaving office, the Trump Administration finalized its pullback of MBTA regulations, despite the ruling of the federal court. On his first day in office, new President Joe Biden placed Trump's changes to the MBTA on hold, pending further review.

Fish and Wildlife Coordination Act

The USFWS also has responsibility for project review under the Fish and Wildlife Coordination Act. This statute requires that all federal agencies consult with USFWS, NMFS, and the state's wildlife agency (California Department of Fish and Wildlife, CDFW) for activities that affect, control, or modify streams and other water bodies. Under the authority of the Fish and Wildlife Coordination Act, USFWS, NMFS, and CDFW review applications for permits issued under Section 404 and provide comments to the Corps about potential environmental impacts.

3.2 State Regulations

Section 401 of the Federal Clean Water Act/Porter Cologne Water Quality Control Act

Pursuant to section 401 of the federal Clean Water Act, projects that require a Corps permit for the discharge of dredge or fill material must obtain water quality certification that confirms a project complies with state water quality standards before the Corps permit is valid. State water quality is regulated/administered by the State Water Resources Control Board and its nine Regional Water Quality Control Boards (RWQCB). A water quality certification from a RWQCB must be consistent with not only the Clean Water Act, but with the California Environmental Quality Act (CEQA), the California Endangered Species Act (CESA), and the SWRCB's requirement to protect beneficial uses of waters of the State.

The State also maintains independent regulatory authority over the placement of waste, including fill, into waters of the State under the Porter-Cologne Water Quality Control Act. Waters of the State are defined more broadly than "waters of the US" to mean "any surface water or groundwater, including saline waters, within the boundaries of the state" (Water Code section 13050(e)). Examples include, but are not limited to, rivers, streams, lakes, bays, marshes, mudflats, unvegetated seasonally ponded areas, drainage swales, sloughs, wet meadows, natural ponds, vernal pools, diked baylands, seasonal wetlands, and riparian woodlands. Waters of the State include all waters within the state's boundaries, whether private or public, including waters in both natural and artificial channels. They include all "waters of the United States"; all surface waters that are not "waters of the United States, e.g. non-jurisdictional wetlands; groundwater; and the territorial seas.

The State Water Resources Control Board's *State Wetland Definition and Procedures for Discharges of Dredge of Fill Material to Waters of the State* adopted April 2, 2019 (the Procedures) along with the *Implementation Guidance for the Procedures* dated April 2020 (the Implementation Guidance) defines a wetland as an area that *under normal circumstances, (1) has continuous or recurrent saturation of the upper substrate caused by groundwater, or*

shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation. The Procedures, along with the Implementation Guidance, state that the permitting authority (e.g. State Water Quality Control Board) shall rely on any wetland area delineation from a final aquatic resource report verified by the Corps. If the Corps does not require an aquatic resource delineation report, an applicant must submit a delineation of all waters, but these delineations will be verified by SWQCB's Regional Water Quality Control Board staff during application review. Similarly, if the Corps does not require a delineation, but similar information is prepared for CDFW, the applicant can submit that information to the Water Boards, who will determine if it is sufficient for the Water Board's purposes. In addition, as a matter of policy, the SWQCB/RWQCBs consider wetlands and waters determined to be non-jurisdictional by the Corps/USEPA under SWANCC or Rapanos guidance or the NWPR to remain jurisdictional as waters of the State subject to SWQCB/RWQCB jurisdiction.

The Procedures along with the Interim Guidance also include procedures for the submission, review, and approval of applications for activities that could result in the discharge of dredged or fill material to any Waters of the State and include elements of the Clean Water Act Section 404(b)(1) Alternatives Analysis Guidelines, thereby bringing uniformity to SWCQB's regulation of discharges of dredged or fill material to all waters of the state. Typically, the Corps requires a Clean Water Act 404(b)(1) Alternatives Analysis for wetland impacts greater than 0.50 acres. The Procedures require an alternatives analyses to be completed in accordance with a three tier system. The level of effort required for an alternatives analysis within each of the three tiers shall be commensurate with the significance of the impacts resulting from the discharge.

The California State Water Resource Control Board has also developed a general construction storm water permit to implement the requirements of the federal National Pollution Discharge Elimination System (NPDES) permit. Projects approved by a RWQCB must, therefore, include the preconstruction requirement for a Stormwater Pollution Prevention Plan and the post-construction requirement for a Stormwater Management Plan.

California Endangered Species Act

The State of California enacted the California Endangered Species Act (CESA) in 1984. The CESA is similar to the FESA but pertains to state listed endangered and threatened species. CESA requires state agencies to consult with the CDFW when preparing CEQA documents to ensure that the state lead agency actions do not jeopardize the existence of listed species. CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify "reasonable and prudent alternatives" to the project consistent with conserving the species. Agencies can approve a project that affects a listed species if they determine that 'overriding considerations" exist; however, the agencies are prohibited from approving projects that would result in the extinction of a listed species.

The CESA generally prohibits the taking of state listed endangered or threatened plant and wildlife species, however, for projects resulting in impacts to state listed species, CDFW may authorize take through issuance of an Incidental Take Permit (ITP) pursuant to Section 2081 of the California Fish and Game Code. Section 2081 requires that such projects implement an approved habitat management plan or management agreement that avoids or compensates for possible jeopardy. CDFW requires preparation of mitigation plans in accordance with published guidelines that require, among other things, measures to fully mitigate impacts to State listed species. CDFW exercises authority over mitigation projects involving state listed species, including those resulting from CEQA mitigation requirements. No authorization of take under Section 2081 is permitted for species listed in state statutes as Fully Protected Species. Where Fully Protected Species are involved, projects must be designed to avoid all take of the species. CDFW cannot issue an ITP until the CEQA Lead Agency has provided documentation in the form of a Notice of Determination that the project has complied with CEQA.

California Department of Fish and Wildlife-Lake and Streambed Alteration Agreement
Section 1602 of the California Fish and Game Code requires any person, governmental agency, or public utility proposing any activity that will divert or obstruct the natural flow or change the bed, channel or bank of any river, stream, or lake, or proposing to use any material from a streambed, to first notify CDFW of such proposed activity. Based on the information contained in the notification form and a possible field inspection, CDFW may propose reasonable modifications in the proposed construction as would allow for the protection of fish and wildlife resources. Upon request, the parties may meet to discuss the modifications. If the parties cannot agree and execute a Lake and Streambed Alteration Agreement, then the matter may be referred to arbitration. CDFW cannot issue a Streambed Alteration Agreement until the CEQA Lead Agency has provided documentation in the form of a Notice of Determination that the project has complied with CEQA.

CDFW's regulations implementing the Fish and Game Code define the relevant rivers, streams, and lakes over which the agency has jurisdiction to constitute "all rivers, streams, lakes, and streambeds in the State of California, including all rivers, streams and streambeds which have intermittent flows of water." (Title 14 *California Code of Regulations* [CCR] § 720). The CDFW takes jurisdiction under its Lake and Streambed Alteration Agreement Program for any work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel. The CDFW does not have a methodology for the identification and delineation of the jurisdictional limits of streams except for the general guidance provided in *A Field Guide to Lake and Streambed Alteration Agreements, Section 1600-1607 California Fish and Game Code* (CDFG 1994). In making jurisdictional determinations, CDFW staff typically rely on field observation of physical features that provide evidence of water flow through a bed and channel such as observed flowing water, sediment deposits and drift deposits and that the stream supports fish or other aquatic life. Riparian habitat is not specifically defined by the Fish and Game Code but CDFW takes jurisdiction over areas within the flood plain of a body of water where the vegetation (grass, sedges, rushes, forbs, shrubs, and trees) is supported by the surface or subsurface flow.

California Department of Fish and Wildlife-Fish and Game Code Section 3503, 3503.5 and 3513. The State of California also incorporates the protection of nongame birds and birds of prey, including their nests, in Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. Section 3503 of the Fish and Game Code makes it unlawful to take, possess, or needlessly destroy the nests or eggs of any bird. Section 3503.5 makes it unlawful to take or possess birds of prey (hawks, eagles, vultures, owls) or destroy their nests or eggs. In December of 2018, California issued new guidance specifying that state law includes "a prohibition on incidental take of migratory birds, notwithstanding any federal reinterpretation of the Migratory Bird Treaty Act" by the Department of Interior.

California Department of Fish and Wildlife Fish- Sensitive Plant Communities.
CDFW has designated special status natural communities which are considered rare in the region, rank as threatened or very threatened, support special status species, or otherwise receive some form of regulatory protection. Sensitive plant communities are those natural plant communities identified in local or regional plans, policies, ordinances, regulations, or by the CDFW which provide special functions or values. Documentation pertaining to these communities, as well as special status species (including species of special concern), is kept by CDFW as part of the California Natural Diversity Data Base (CNDDB). All known occurrences of sensitive habitats are mapped onto 7.5 minute US Geological Survey (USGS) topographic quadrangle maps maintained by the CNDDB. Sensitive plant communities are also identified by CDFW on their List of California Natural Communities Recognized by the CNDDB. Impacts to sensitive natural communities must be considered and evaluated under CEQA.

California Department of Fish and Wildlife- Species of Special Concern
CDFW tracks species in California whose numbers, reproductive success, or habitat may be threatened. Species that may be considered for review are included on a list of "Species of Special Concern" developed by the CDFW. Even though these species may not be formally listed under FESA or CESA, such plant and wildlife species must be evaluated during the CEQA review of development projects, and mitigation should be developed to prevent significant impacts to such species.

California Department of Fish and Wildlife- Fully Protected Animal Species
The classification of Fully Protected was an effort by the State of California in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Most Fully Protected species have also been listed as threatened or endangered species under state endangered species laws and regulations. Species classified as Fully Protected Species by the CDFW may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock (as per California Fish and Game Code Section 3511(a)(1)).

California Native Plant Society

The California Native Plant Society (CNPS) maintains a list of plant species native to California that have low numbers, limited distribution, or are otherwise threatened with extinction. This information is published in the Inventory of Rare and Endangered Plants of California (CNPS 2014: https://www.cnps.org/cnps/rareplants/inventory/). Potential impacts to populations of CNPS-listed plants receive consideration under CEQA review, especially for those plant species including in Lists 1 and 2. The following identifies the definitions of the CNPS listings: https://www.cnps.org/cnps/rareplants/ranking.php

California Rare Plant Rank 1A:	Plants presumed extirpated in California and either rare or extinct elsewhere.
California Rare Plant Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere.
California Rare Plant Rank 2A:	Plants presumed extirpated in California, but more common elsewhere.
California Rare Plant Rank 2B:	Plants rare, threatened, or endangered in California, but more numerous elsewhere.
California Rare Plant Rank 3:	Plants about which more information is needed – a review list.
California Rare Plant Rank 4:	Plants of limited distribution – a watch list.

3.3 City of American Canyon Policies

City of American Canyon General Plan

In addition to federal and state regulations, the development of the property must be accomplished consistent with the land use designations and natural resource and other policies of the City of American Canyon General Plan. The objectives and policies of the City General Plan related to Biological Resources are under the Goal 8 of the Plan, which is "Protect and preserve the significant habitats, plants and wildlife that exist in the City and its Planning Area." Relevant objectives intended to obtain the overall goal and policies of the City related to biological resources are listed below:

Objective 8.1: Maintain data and information regarding areas of significant biological value within the Planning Area to facilitate resource conservation and the appropriate management of development.

> Policy 8.1.1: Acquire and maintain the most current information available regarding the status and location of sensitive biological elements (species and natural communities) within the City and, as appropriate, within the Sphere of Influence and Urban Limit Line.
>
> Policy 8.1.4: Regularly monitor and review developments proposed within the City's Planning Area to assess their impacts on local biological resources and to recommend

appropriate mitigation measures that the developer and/or government agency can implement.

Objective 8.2: Balance the preservation of natural habitat areas, including coastal saltmarsh, mixed hardwood forest, oak savannah, and wetland and riparian habitats, with new development in the City.

Policy 8.2.1: Land use applications for developments located within sensitive habitats, including coastal saltmarsh, mixed hardwood forest, oak savannah, and riparian habitats or with areas potentially occupied by vernal pools shall be accompanied by sufficient technical background data to enable an adequate assessment of the potential for impacts on these resources, and possible measures to reduce any identifiable impacts. In addition to examining the General Plan for information on these sensitive habitats, an on-site assessment shall be conducted by a City approved qualified biologist to determine if sensitive habitats exist on-site. In instances where the potential for significant impacts exists, the applicant must submit a Biological Assessment Report prepared by a qualified professional.

Objective 8.3: Protect natural drainages and riparian corridors within the City of American Canyon Planning Area.

Policy 8.3.1: Review proposed developments in wetlands and riparian habitats to evaluate their conformance with the following policies and standards:

a. The development plan shall fully consider the nature of existing biological resources and all reasonable measures shall be taken to avoid significant impacts, including retention of sufficient natural open space and undeveloped buffer zones.

b. Development shall be designed and sited to preserve watercourses, riparian habitat, vernal pools, and wetlands in their natural condition, unless these actions result in an unfeasible project, in which case habitat shall be replaced in accord with subsection "g" (below).

c. Where riparian corridors are retained, they shall be protected by an adequate buffer width of a minimum 100-foot protection zone from the edge of the tree, shrub, or herb canopy.

d. Development shall incorporate habitat linkages (wildlife corridors) to adjacent open spaces, where appropriate and feasible.

e. Development shall incorporate fences, walls, vegetative cover, or other measures to adequately buffer habitat areas, linkages, or corridors from built environment.

f. Roads and utilities shall be located and designed such that conflicts with biological resources, habitat areas, linkages or corridors are avoided where feasible.

g. Future development shall utilize appropriate open space or conservation easements in order to protect sensitive species or their habitats.

h. Future development shall mitigate unavoidable adverse impacts to waters of the United States and waters of the State, wetlands, and riparian habitats (pursuant to the Federal Clean Water Act, Porter-Cologne Water Quality Control Act and the California Fish and Game Code, Section 1600 et seq.) by replacement on an in-kind basis. Furthermore, replacement shall be based on a ratio determined by the California Department of Fish and Game, and/or US Army Corps of Engineers in order to account for the potentially diminished habitat values of replacement habitat. Such replacement should occur on the original development site, whenever possible. Alternatively, replacement can be affected, subject to state and federal regulatory approval, by creation or restoration of replacement habitats elsewhere (offsite but preferably within the City's Planning Area), protected in perpetuity by provision for an appropriate conservation easement or dedication.

Policy 8.3.6: Preserve and integrate the City's natural drainages in new development, as opposed to their channelization or undergrounding, emphasizing opportunities for the development of pedestrian paths and greenbelts along their lengths throughout the City.

Objective 8.4: Protect local vernal pools as well as the habitats of endangered species living within the City of American Canyon's Planning Area.

Policy 8.4.1: Require that development plans incorporate all reasonable mitigation measures to avoid significantly impacting vernal pools for projects located within the City of American Canyon's Planning Area.

Policy 8.4.3: Encourage activities that improve the biological value and integrity of the City’s natural resources through vegetation restoration, control of alien plants and animals, and landscape buffering.

4.0 EXISTING BIOLOGICAL SETTING

The 207.8-acre Project Site is located in the northwestern portion of the City of American Canyon, Napa County, California. A regional location map for the Project Site is shown in Figure 1 and the area in the vicinity of the site is shown in Figure 2. Figure 3 shows the location of the Project Site on the Cuttings Wharf, California, United States Geological Survey 7.5-minute topographic quadrangle, Township 4 North, Range 4 West, Sections 13 and 14 (Latitude 38° 11' 50" North; Longitude 122° 15' 36" West).

Figure 4 is an aerial photograph of the Project Site that portrays existing site conditions and the surrounding land uses. The Project Site is bound by industrial development in the Green Island Business Park to the west, the Napa Logistics Project and Devlin Road to the north, and the Napa Branch Line of the Southern Pacific Railroad to the east. A wine distribution warehouse is to the southeast and a stone supply business to the southwest.

The description of the biological setting for the property is based on field visits to the site by HBG Senior Environmental Scientist Gary Deghi, Senior Wetland Scientist Robert Perrera, and Wildlife Biologist Emilie Strauss between December of 2020 and April of 2021. In addition, HBG independently reviewed and incorporated a number of studies previously prepared for the Project Site by other consultants and conducted additional specialized studies using species experts as part of work in preparing this document.

Previously prepared biological studies pertaining to the site included an aquatic resources delineation prepared by Monk & Associates (2016) and surveys for federally listed vernal pool brachiopods conducted by both LSA Associates (2016) and Monk & Associates (2017). HBG included a Habitat Assessment for the federally listed threatened California red-legged frog prepared by Dr. Mark Jennings and rare plant surveys, currently underway, by Dr. Brent Helm during the 2021 flowering season. Also relevant to the biological evaluation were Biological Resource Reports prepared by Monk & Associates for two separate Initial Study/Mitigated Negative Declarations prepared by the City of American Canyon for projects with project boundaries either shared with or adjacent to the Project Site. These include Biological Resource Reports for the Devlin Road Extension Project (Monk & Associates 2018) and the Green Island Road Reconstruction and Widening Project (Monk & Associates 2019).

4.1 Climate

The Project Site is located in the City of American Canyon, which is part of the greater north San Francisco Bay area. Like other portions of northern California, American Canyon experiences a Mediterranean climate characterized by warm, dry summers and cool, wet winters. The project area typically exhibits annual low/high temperatures between 40 and 80 degrees Fahrenheit and an annual average rainfall of approximately 20 inches.

4.2 Hydrology

The 207.8-acre Project Site is currently undeveloped land with a range of elevations between 35 and 50 feet msl. The headwaters of No Name Creek occurs within the northwestern portion

of the Project Site. The Project Site gently slopes from east to west at about zero to two percent to the northwestern corner of the property where No Name Creek flows off the site through the Napa Logistics wetland preserve and is hydrologically connected to Fagan Slough which flows into the Napa River. The majority of wetlands that occur throughout the site and are supported by direct precipitation.

As shown on Figure 7 the Study Area primarily lies within the USGS Hydrologic Unit Code (HUC) 10-digit subwatershed of the Tulucay Creek-Frontal San Pablo Bay Estuaries (1805000204).

4.3 Topography and Soils

The majority of the Project Site is relatively flat at approximately 40 feet mean sea level and a total elevation variance of 30 feet. The Project Site generally slopes at about zero to two percent with two highpoints to the southeast and southwest of the gradually sloping north toward No Name Creek. Although the remaining portions of the Project Site are relatively flat, grazing and inundation in topographic low areas has created a hummocky landscape with depressional microrelief. As a result, there are small seasonal wetlands and swales scattered throughout the site. Other large, and deep wetlands occur on the eastern and southern portions of the site. In the southeastern portion of the Project Site a berm confines surface water sheet flows creating several inundated depressional features.

Soil survey information for the Project Site was obtained from the National Resources Conservation Service Web Soil Survey (NRCS 2021). Three different soil types were mapped by NRCS within the Project Site. The mapped soil units include: Clear Lake clay drained (116), 0 to 2 percent slopes, Haire loam (146), 2 to 9 percent slopes, and Haire clay loam (148), 2 to 9 percent slopes (USDA 1972). A soil map for the Project Site is shown in Figure 8.

The Clear Lake series consists of poorly drained soils on old alluvial fans and basins. Elevation is 25 to 2000 feet. These soils formed in alluvium derived from sedimentary rock. The plant cover is annual grasses and forbs. The mean annual precipitation is 25 to 35 inches and the mean annual temperature is 59 to 63 degrees. Clear Lake clay drained soil is classified as a hydric soil (i.e., those soils that form in wetlands) by the NRCS.

The Haire Loam series consists of moderately well-drained soils, slow to rapid runoff, and very slow permeability on alluvial fans and terraces. Elevation is 20 to 2,402 feet. These soils formed in alluvium derived from sedimentary rock. The plant cover is annual grasses and forbs. The mean annual precipitation is 25 to 30 inches and the mean annual temperature is 57 to 61 degrees Fahrenheit. Haire Loam soil is not classified as hydric soil (i.e., those that form in wetlands) by the NRCS.

The Haire clay loam series consists of moderately well-drained soils, with high run off, on alluvium derived from sedimentary rock. Elevation is 20 to 2402 feet. The plant cover is annual grasses and forbs. The mean annual precipitation is 25 to 30 inches and the mean annual

temperature is 57 to 61 degrees Fahrenheit. Haire Clay Loam is not classified as a hydric soil (i.e., those that form in wetlands) by the NRCS.

4.4 Plant Communities

Vegetation communities are assemblages of plant species growing in an area of similar biological and environmental factors. Vegetation communities and habitats at the Project Site were identified based on the currently accepted List of Vegetation Alliances and Associations or Natural Communities (CDFW 2010). The list is based on A Manual of California Vegetation, Second Edition (Sawyer et al 2009), which is the National Vegetation Classification applied to California. The Project Site contains two habitat types: Non-native Grassland and Coastal and Valley Freshwater Marsh in the form of seasonal wetlands and swales. This identification of habitat types on the property matches the findings of Monk & Associates as stated in their wetland delineation technical letter report submitted to the USACE (Monk & Associates 2016). An inventory of plant species found on the Giovannoni property during biological studies conducted by Monk & Associates is provided in Attachment 2, Table 1.

Non-native annual grasslands. Non-native annual grasslands, dominated by introduced annual grasses and forbs, comprise the predominant habitat types on the property. The dominant species in the grasslands were identified when Monk & Associates conducted their aquatic resources delineation on the Project Site and report in their technical report submitted to the Corps of Engineers (Monk & Associates 2016). Dominant non-native annual grass species on the project site include Italian ryegrass (*Festuca perennis*), Mediterranean barely (*Hordeum marinum* ssp. *gussoneanum*), medusa head (*Elymus caput-medusae*), and soft chess (*Bromus hordeaceus*). Common non-native forbs found on the Project Site include bird's foot trefoil (*Lotus corniculatus*), subterranean clover (*Trifolium subterranean*), broad-leaf filaree (*Erodium botrys*), English plantain (*Plantago lanceolata*), yellow glandweed (*Parentucellia viscosa*), Mediterranean linseed (*Bellardia trixago*), spring vetch (*Vicia sativa*), and bristly ox-tongue (*Helminthotheca echioides*). Native forbs and wildflowers were also present and include yellow owl's clover (*Triphysaria versicolor* ssp. *faucibarbata*), hayfield tarplant (*Hemizonia congesta* ssp. *luzulifolia*), and coastal tarweed (*Deinandra corymbosa*). Other common species noted by HBG biologists during winter surveys in 2020 included species such as Harding grass (*Phalaris aquatica),* rip-gut brome (*Bromus diandrus*), field bindweed (*Convolvulus arvensis*), and sweet fennel (*Foeniculum vulgare*). Other species included scattered coyote brush (*Baccharis pilularis*) and Himalaya berry (*Rubus armeniacus*), especially around the edges of the property.

Seasonal Wetlands and Swales. Seasonal wetlands on the property are vegetated with a variety of native and non-native species adapted for life in saturated soil conditions. Monk & Associates noted the vegetation in the seasonal wetlands and swales as being dominated by primarily native species such as annual semaphore grass (*Pleuropogon californicus* var. *californicus*), creeping spikerush (*Eleocharis macrostachya*), iris-leaved rush (*Juncus xiphioides*), California coyote thistle (*Eryngium aristulatum* var. *aristulatum*), meadow barley (*Hordeum brachyantherum*), smooth goldfields (*Lasthenia glaberrima*), Great Valley popcorn flower (*Plagiobothrys stipitatus* var. *micranthus*), and wavy stemmed popcorn flower (*P. undulatus*),

along with a few non-native wetland species such as rabbit's foot grass (*Polypogon monspeliensis*) and brass buttons (*Cotula coronopifolia*). Other plants noted in the seasonal wetlands during winter surveys conducted by HBG included species such as annual hairgrass (*Descampsia danthanoides*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), saltgrass (*Distichlis spicata*), pennyroyal (*Mentha pulegium*), rough cocklebur (*Xanthium strumarium*), tall flat-sedge (*Cyperus eragrostis*), and swamp timothy (*Crypsis schoenoides*), and in some areas of deeper inundation, broadleaf cattail (*Typha latifolia*).

4.5 Animal Populations

The Project Site provides limited habitat for wildlife species, mostly those adapted to open areas and farm fields and disturbed environments. Grasses and herbaceous plants within the Project Site provide limited nesting and roosting sites for birds, and cover and foraging habitat for species of birds, mammals, reptiles, and amphibians. Seasonal wetlands provide wildlife with a seasonal water source that supports various animal species during the winter and spring months and sometimes into the early summer. Amphibians will lay their eggs in seasonal wetland habitats and complete much of their life cycle in the wetlands. No Name Creek would be considered a wildlife corridor, but the property is nearly entirely surrounded by development so the extent of wildlife corridors on the property is limited.

A number of wildlife species were documented during a winter season survey conducted at the Project Site by wildlife biologist Gary Deghi of HBG on December 10, 2020. All species documented at the site are common to abundant in the region and would be expected in the non-native grasslands and seasonal wetlands present at the site. Bird species documented included various species adapted to grasslands and open areas including Canada goose (*Branta canadensis*), California gull (*Larus californicus*), mourning dove (*Zenaida macroura),* Eurasian collared-dove (*Streptopelia decaocto*), rock pigeon (*Columba livia*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), black phoebe (Sayo*rnis nigricans*), Say's phoebe (*Sayornis saya*), savannah sparrow (*Passerculus sandwichensis*), red-winged blackbird (*Agelaius phoeniceus),* and western meadowlark (*Sturnella neglecta*). Other species in taller vegetation and landscaping around the edges of the site and just off-site included California scrub-jay (*Aphelocoma californica*), bushtit (*Psaltriparus minimus*), northern mockingbird (*Mimus polyglottos)*, European starling (*Sturnis vulgaris*), white-crowned sparrow (*Zonotrichia leucophrys*), California towhee (*Melozone crissalis*), house finch (*Haemorhous mexicanus*), and lesser goldfinch (*Spinus psaltria*). Raptors (birds of prey) observed foraging over the grasslands and wetlands of the Project Site were fairly common during the winter survey and included American kestrel (*Falco sparverius*), white-tailed kite (*Elanus leucurus*), red-tailed hawk (*Buteo jamaicensis*), Northern harrier (*Circus hudsonius*), and turkey vulture (*Cathartes aura*).

HBG wildlife biologist Emilie Strauss conducted a spring season site reconnaissance on April 16, 2021 on the Project Site. Many of the bird species observed included species observed during the winter, but additional resident species observed during the April visit included ring-necked pheasant (*Phasianus colchicus*), great blue heron (*Ardea herodia*), great egret (*Ardea alba*), and killdeer (*Charadrius vociferus*). Additional species added during the spring survey included

spring arrivals of migrant species. Breeding season raptor observations included foraging Northern harrier (a state designated species of special concern for nesting habitat that was also observed foraging over the site in winter), as well as foraging by state listed threatened Swainson's hawk (*Buteo swainsoni*). A California Fully Protected golden eagle (*Aquila chrysaetos*) was also observed over the Project Site being harassed by the Swainson's hawk and flying low exhibiting foraging behavior. These three special status raptor species have nested in this part of Napa County in the past, and it is entirely possible these individuals could be nesting somewhere in the vicinity of the Project Site. HBG wildlife biologist Emilie Strauss drove about 10 miles of local roads surrounding the Project Site to inspect trees for raptor nest structures. No Swainson's hawk nest structures were observed. Additional species observed in the spring survey included cliff swallow (*Petrochelidon pyrrhonota*) and barn swallow (*Hirundo rustica*).

During their biological studies related to the Green Island Road Widening and Devlin Road Extension Projects in 2018 and 2019, Monk & Associates observed several species of waterfowl and shorebirds in the on-site seasonal wetlands. These species were not observed during the December 10, 2020 or April 16, 2021 surveys by HBG as surface ponding was lacking on the site then due to the paucity of rain. These species included mallard (*Anas platyrhynchos*), American wigeon (*Anas americana),* greater yellowlegs (*Tringa melanoleuca*), long-billed curlew (*Numenius americanus*), marbled godwit (*Limosa fedoa*), western sandpiper (*Calidris mauri*), and Wilson's snipe (*Gallinago delicata*).

No amphibians were documented on the property by HBG, but Pacific treefrog (*Pseudacris regilla*) was noted by Monk & Associates biologists while studying the Green Island Road Extension. Reptile sightings at the site by HBG included western fence lizard (*Sceloperus occidentalis);* other reptiles likely include Pacific gopher snake (*Pituophis catenifer)* and common garter snake (*Thamnophis sirtalis elegans)*. Observed evidence of mammals on the site by HBG were black-tailed jackrabbit (*Lepus californicus*), dens of Botta's pocket gopher (*Thomomys bottae*) and California vole (*Microtus californicus*), several California ground squirrels (*Otospermophilus beecheyi*) in a rubble pile in the southwestern portion of the site, and three mule deer (*Odocoileus hemionus*) in the southeastern portion of the property. Monk & Associates apparently observed raccoon (*Procyon lotor*) while conducting studies for the Devlin Road Extension Project. Other expected mammals would be those adapted to disturbed, urban environments such as Virginia opossum (*Didelphis virginiana*), deer mouse (*Peromyscus maniculatus*), and striped skunk, (*Mephitis mephitis*).

4.6 Wetlands

Aquatic Resources Delineation Methodology. Monk & Associates conducted an aquatic resources delineation on the Project Site in 2016. Field work for the delineation was conducted during the period of April 15 to May 26, 2016. Monk & Associates biologists used the Corps' 1987 Wetlands Delineation Manual in conjunction with the regional supplement for the Arid West Region to prepare this wetland delineation. A jurisdictional determination request and the Draft Aquatic Resources Delineation Map were prepared in compliance with the Corps' 2016 Minimum Standards for Acceptance of Aquatic Resources Delineation Reports and the

2016 Updated Map and Drawing Standards for the South Pacific Division Regulatory Program (Monk & Associates 2016).

Vegetation, hydrology, and soils information were taken at 142 data points. Data points were mapped using a Trimble Pro-XR Global Positioning System (GPS) having sub-meter accuracy. The delineation map was made from the GPS files using ArcMap 10.2. All spatial data were projected into the California State Plane, NAD 83 coordinate system, Zone 2. Using GPS technology, the boundaries (within 30 inches) of each delineated wetland was transferred to an aerial photograph of the Project Site (Monk & Associates 2016).

Aquatic Resources Delineation Results. The Aquatic Resources Delineation map prepared by Monk & Associates was submitted to the San Francisco District of the USACE on August 29, 2016 and was confirmed by letter from the USACE dated November 8, 2016. The wetlands found on the Project Site as mapped by Monk & Associates (2016) and verified by the USACE are provided in Attachment 4. The mapped areas classified as wetlands exhibited a dominance of hydrophytic vegetation, as well as hydric soils and wetland hydrology. Hydrological indicators in mapped wetlands included the presence of oxidized rhizospheres along living roots (C3), surface soil cracks (B6), algal matting (Biotic Crust B12), aquatic invertebrates (B13), and vegetation suppression (indicating long-term inundation) within these wetland areas. Evidence of hydric soils included Redox Dark Surface F6 and Depleted Matrix F3 as defined in the approved regional supplement for the Arid West Region and the Field Indicators of Hydric Soils in the United States (Monk & Associates 2016).

The majority of the seasonal wetlands on the Project Site gradually drain north toward No Name Creek. No Name Creek, within the Project Site, does not exhibit an ordinary high water mark, and is therefore categorized as a seasonal wetland. No Name Creek flows off the Project Site to the west before draining into Fagan Slough, a tidal water of the United States. Fagan Slough is tributary to the Napa River, a traditional navigable water (TNW) that flows to San Pablo Bay. Therefore, the 11.93 acres of seasonal wetlands in the north and southwest corner of the site are regulated as “waters of the U.S.” pursuant to Section 404 of the Clean Water Act and are subject to USACE jurisdiction (see Attachment 4). Several features in the southeastern portion of the Project Site are mapped as “isolated” seasonal wetlands since they do not have hydrologic connectivity to any water of the U.S. The “isolated” features are contained within discreet topographic depressions, surrounded by uplands and berms that are higher in elevation, thereby isolating these features from any water of the U.S. A total of 0.84 acre of “isolated” features that are mapped on the Project Site are not subject to USACE jurisdiction as shown on Exhibit 6.

The total area of USACE jurisdictional wetlands mapped on the Project Site is 11.93 acres. The total area of “isolated” wetlands mapped on the Project Site is 0.84 acre. HBG has determined that the areas mapped as isolated wetlands and not subject to jurisdiction of the USACE under the federal Clean Water Act would be subject to the wetland criteria of the state Porter-Cologne Water Quality Control Act and the jurisdiction of the San Francisco Bay Regional Water

Quality Control Board as a Water of the State. A total of 12.77 acres of wetlands would be subject to the regulatory jurisdiction of the San Francisco Bay RWQCB (SFBRWQCB) as Waters of the State. The portion of the Project Site along the northern boundary of the site contained within the confines of No Name Creek would be subject to the regulatory jurisdiction of the California Department of Fish and Wildlife (CDFW) under Fish and Game Code Section 1602.

4.7 Special Status Species

Special status species include those species listed by the federal and state governments as endangered, threatened, or rare or candidate species for these lists. Endangered or threatened species are protected by the federal Endangered Species Act of 1973 as amended, the California Native Plant Protection Act of 1977, and the California Endangered Species Act of 1970. The California Environmental Quality Act (CEQA) provides additional protection for unlisted species that meet the "rare" or "endangered" criteria defined in Title 14, California Code of Regulations Section 15380. Special status species also include those species listed by CDFW as Species of Concern which face extirpation in California if current population and habitat trends continue, those listed as Fully Protected by CDFW (a designation that provides additional protection to those animals that are rare or face possible extinction), and bird species designated as Bird Species of Conservation Concern by the USFWS. These state and federal Species of Concern must be evaluated in the context of evaluation under CEQA, which also requires evaluation of impacts to plant species on California Native Plant Society (CNPS) Lists 1 and 2. Special status species included in CEQA review also include bat species that have been designated with conservation priority by the Western Bat Working Group.

The CDFW maintains records for the distribution and known occurrences of special status species and sensitive habitats in the California Natural Diversity Database (CNDDB). The CNDDB is organized into map areas based on 7.5 minute topographic quadrangle maps produced by the USGS. All known occurrences of special status species are mapped onto quadrangle maps maintained by the CNDDB. The database gives further detailed information on each occurrence, including specific location of the individual, population, or habitat (if possible) and the presumed current state of the population or habitat. The Project Site is within the encompasses Cuttings Wharf 7.5 minute quadrangle map.

Tables 2 and 3 in Attachment 2 present a list of special status plants and animals, respectively, that have been reported by the CNDDB in the project vicinity within 10 miles of the site. An evaluation of the potential for all potential sensitive species to occur at the site is included in Tables 2 and 3 in Attachment 2. Key species are discussed below.

4.7.1 Special Status Plant Species

A list of special status plants with potential to occur on the Project Site was developed from the CNDDB. A complete list of special status plant species occurring in the vicinity of the property is included in Table 2 in Attachment 2. The table includes all species of flora mentioned in the CNDDB within approximately ten miles of the site.

A number of special status plant species listed in Table 2 in Attachment 2 are known to occur in the Napa area. No special-status plants have been mapped on or adjacent the Project Site. However, according to the CNPS' Inventory and the California Department of Fish and Wildlife's (CDFW) CNDDB, a number of special-status plant species are known to occur in the Project Site vicinity. No special-status plants were identified on the Project Site by Monk & Associates while conducting various studies on the property in 2016, including an aquatic resources delineation and other evaluations conducted during the March to July flowering season of 2016. However, these studies did not constitute protocol surveys. Therefore, HBG has retained Dr. Brent Helm to conduct protocol rare plant surveys during the 2021 flowering season. These surveys are currently underway, and a special status plant survey report is expected to be completed by July of 2021.

4.7.2 Special Status Animal Species

Animal species noted in the CNDDB as occurring within a 10-mile radius of the site, or that are known to occur in the general vicinity based on the knowledge of HBG biologists, are discussed in Table 3 in Attachment 2. A number of special status animal species are noted in the CNDDB as occurring in the general vicinity of the Project Site with habitat requirements similar to the habitats present on the Project Site. These species include vernal pool fairy shrimp (*Branchinecta lynchi*), California red-legged frog (CRLF, *Rana draytonii),* Western pond turtle (*Emmys marmorata*), Swainson's hawk (*Buteo swainsoni*), golden eagle (*Aquila chrysaetos*), northern harrier (*Circus hudsonius*), burrowing owl (*Athene cunicularia*) and tricolored blackbird (*Aegelaius tricolor*). These species are discussed in detail below. CDFW is also concerned over rapid declines in populations of monarch butterflies (*Danuas plexippus*), and a discussion of this species in relation to the proposed project is also included below.

None of the other animal species discussed in the table have the potential to occur on the site. This finding is made based on the habitat requirements of species listed in the table and is based on field review of habitats present at the site and the immediate vicinity and an evaluation of the suitability of on-site habitats to support these species.

Monarch Butterfly

Background. The monarch (*Danuas plexippus*) is designated as a California Terrestrial and Vernal Pool Invertebrate of Conservation Priority and has recently been advanced as a candidate species for listing under the federal Endangered Species Act. The species is well-known for its north-south migrations from Canada to Mexico which span the lives of several generations. Monarch butterfly winter roost sites, typically used between October and February, extend along the West Coast from Mendocino County in northern California, south to Baja California in Mexico. Winter roosts consist of hundreds or thousands of monarchs in wind-protected tree groves close to sources of nectar and water. On the California coast, these roosts usually form in eucalyptus, but Monterey pine and Monterey cypress groves are also used. Monarch populations across North America have fallen by as much as 90 percent in the last two decades and in February 2015, the USFWS showed that nearly a billion monarchs had vanished from overwintering sites since 1990. The larval host plant for monarchs is milkweeds,

primarily milkweeds of the genus *Asclepias*. The main reason for the decline has been attributed to herbicides used by farmers and homeowners on milkweed, the butterfly's larval host plant.

Occurrence in the Project Area. No trees are present on the Project Site so there is no possibility for the presence of a monarch overwintering site on the Project Site. Several biological investigators have studied the Project Site and none have reported the presence of milkweed plants, primarily of the genus *Asclepias*, that serve as the larval host plant for monarchs. Monk & Associates prepared an inventory of plants present on the Giovannoni site as part of a wetland delineation conducted at the site in 2016 (this list is included herein as Table 1 in Attachment 2), and no milkweed plants of the genus *Asclepias* are noted in the table. No suitable habitat for monarch butterflies is found on the site. As part of Dr. Brent Helm's protocol rare plant surveys he is currently conducting, any observations of milkweed plants of the genus *Asclepias* will be recorded. The presence of an individual monarch butterfly at the site would be purely incidental and not related to the presence of larval host plants for breeding or of suitable overwintering sites.

Vernal Pool Fairy Shrimp

Background. Vernal pool fairy shrimp was designated as threatened in its entire range on September 19, 1994 (Federal Register 59:48136-48153). Critical habitat for this species was originally designated on August 6, 2003 (Federal Register 68: 46683-46867), and the designation was revised on August 11, 2005. Critical habitat unit designations by individual fairy shrimp species were published on February 10, 2006 (Federal Register 71:7117). The project site is approximately 0.40-mile southeast of designated critical habitat.

The vernal pool fairy shrimp (*Branchinecta lynchi*) is a small aquatic crustacean that ranges in size from ½ to one inch long that is federally listed as a threatened species. Fairy shrimp feed on algae, bacteria, protozoa, rotifers, and bits of detritus. The vernal pool fairy shrimp occupies a variety of different vernal pool habitats, from small, clear, sandstone rock pools to large, turbid, alkaline, grassland valley floor pools. It tends to occur in smaller pools (less than 0.05-acre) that are most commonly found in grass or mud bottomed swales, or basalt flow depression pools in unplowed grasslands. It has also been collected in large vernal pools (e.g. 25 acres). Vernal pool fairy shrimp have been collected from early December to early May (USFWS 2005).

Vernal pool fairy shrimp populations are presently known from localities in California, extending from Stillwater Plain in Shasta County through most of the length of the Central Valley to Pixley in Tulare County, and along the central coast range from northern Solano County to Pinnacles National Park in San Benito County. Disjunct populations are located near Soda Lake in San Luis Obispo County, in the mountain grasslands of northern Santa Barbara County, on the Santa Rosa Plateau in Riverside County, and near Rancho California in Riverside County. Vernal pool fairy shrimp mature quickly and can persist in short-lived shallow pools and longer lasting pools that remain later in the spring. This species inhabits pools with clear to tea-colored water, most commonly in grass or mud bottomed swales, or basalt flow depression pools in unplowed

grasslands, but sometimes in sandstone rock outcrops and alkaline vernal pools. The water in these pools has low total dissolved solids, conductivity, alkalinity, and chloride.

Occurrence in the Project Area. Formal protocol surveys for vernal pool brachiopods, including the federally listed threatened vernal pool fairy shrimp (*Branchinecta lynchi*), were conducted on the Project Site with negative findings. Surveys were conducted following USFWS survey protocol (USFWS 2015) as approved by the USFWS on August 18, 2016. Wet season surveys were completed by Monk & Associates (Monk and Associates 2017) between November 2016, when it could be documented that wetland features on the property had at least 1 inch of standing water, and the end of February 2017. Dry season surveys were conducted by LSA Associates (LSA 2016) during the summer of 2016. No vernal pool brachiopods or their cysts were found during the wet season and dry season protocol surveys conducted at the Project Site. Although vernal pool seasonal wetlands occur on the Project Site, based on the results of the protocol surveys conducted, it can be definitively stated that the federally listed threatened vernal pool fairy shrimp does not occur on the Project Site.

California Red-legged Frog

Background. The California red-legged frog (CRLF, *Rana draytonii)* is a federally threatened species and California Species of Special Concern. The historical range of the California red-legged frog extended from the vicinity of mid-Mendocino County, southward to northwestern Baja California, Mexico and inland to approximately Redding in Shasta County (61 Federal Register 25813; 75 Federal Register 12816). The frog has sustained a 70 percent reduction in its geographic range. The project area is not part of the critical habitat designated under the Endangered Species Act for the CRLF.

California red-legged frogs have been observed in aquatic and terrestrial habitats, including marshes, streams, lakes, reservoirs, ponds and other permanent, or near permanent, sources of water. Although they occur in ephemeral streams or ponds, CRLF are expected to thrive in permanent deep-water pools with dense stands of overhanging willows and emergent vegetation, and suitable sites for basking. However, they have been observed in a variety of aquatic environments, including stock ponds and artificial pools with little to no vegetation. California red-legged frogs usually are observed near water but can move long distances over land between water sources during the rainy season.

The life cycle and patterns of movement of the CRLF have evolved along with the local California climate of wet, cool winters and dry, warm summers. With the onset of the winter rains, CRLF move from dry-season refuges to ponds and streams that can support breeding and successful tadpole development. Tadpoles generally take until late summer or early fall to complete metamorphosis, and then the maturing young frogs (metamorphs) move to aquatic areas to take cover from predators. Adult frogs often remain year-round at perennial ponds with deep water, but some depart for dry season refuges once breeding is over. Juveniles (frogs that are older than metamorphs but not yet sexually mature) disperse widely over the landscape during the first winter and will take residence in almost any water source. During the

dry months of summer and fall, CRLF seek suitable dry season refuge sites that may include deep water holes in drying streams, springs and spring boxes, seeps, and small mammal burrows (especially in or near vegetation). However, CRLF need to hydrate at least every couple of days in order to survive. Thus, such small mammal refuge sites must be close to a permanent water source for frogs to rehydrate. To find these refuges, frogs will travel several hundred yards where suitable refuges are abundant and up to three miles in moist coastal areas. Often, long distance movements are in a relatively straight line over hills and drainages between the beginning and end points.

Occurrence in the Project Area. Monk & Associates (2018, 2019) conducted surveys for special status plants and animals, including CRLF, on the small portion of the site slated for road improvements for the Devlin Road and Green Island Road improvements. No CRLF were encountered during these surveys, and they found that the wetlands associated with the road improvements were inundated to only 3 to 4 months of the year (too short to support CRLF breeding) and were too shallow and seasonal to support breeding by CRLF.

Herpetologist Dr. Mark Jennings of Rana Resources conducted a protocol Phase 1 Habitat Assessment for CRLF in 2021 as part of the studies conducted for this Biological Resources Report. Dr. Jennings reported that the project site lacks habitat necessary to support CRLF. The closest known CRLF records to the Project Site are 0.6-2.4 miles to the east and southeast. Additional CRLF records 3.7 miles away lie within Critical Habitat designated for this species (SOL-2 and SOL-3). All of these records lie east of Highway 29 which is a major barrier to any potential movements of CRLF to the west due to continuous traffic, highway berms, and the re-routing of drainages into culverts under the freeway. Additionally, the Project Site is completely isolated from all areas to the east by Highway 29, railroads, buildings, and other urban infrastructure, and there are no hydrologic connections with any stream channels off-site to the east of Highway 29. Finally, there is no suitable breeding or rearing habitat for CRLF on the Project Site due to the shallow and ephemeral nature of the seasonal wetlands and the lack of any suitable riparian vegetation for cover. Dr. Jennings concluded that CRLF do not occupy the Project Site. The CRLF Habitat Assessment prepared by Dr. Jennings is included as Attachment 3.

Western Pond Turtle

Background. The Western pond turtle (*Emmys marmorata*) is a state species of special concern. Pond turtles occupy ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. The turtles prefer aquatic habitats with calm waters, vegetated banks and emergent logs or rocks to use as basking sites. The turtles also rely on suitable upland areas of scrub and woodlands for aestival refugia and may use upland habitats up to 0.5 km from water for activities such as egg-laying. Pond turtles living in streams may vacate flood-prone areas during the rainy season. Western pond turtles occur broadly in suitable habitats throughout the state of California.

Occurrence in the Project Area. Western pond turtle is known from the project area. The nearest sighting to the Giovannoni site reported in the CNDDB is of two turtles reported in 2002 from North Slough, a location that is approximately 0.25 miles from the southern property boundary. However, suitable habitat for western pond turtle does not occur on the Giovannoni site due to the shallow and ephemeral nature of the seasonal wetlands, which are inundated for only about 3 to 4 months out of the year and even less in drought years. Suitable shrub/woodland in surrounding uplands and appropriate basking sites are also lacking. It can be definitively stated that western pond turtle does not occupy the project site due to the lack of suitable habitat.

Swainson's Hawk

Background. The Swainson's hawk (*Buteo swainsoni*) is a medium-sized hawk that is state listed in California under CESA as threatened species. This hawk is also designated by the USFWS as a Bird Species of Conservation Concern. Most Swainson's hawk territories in the Central Valley are in riparian systems adjacent to suitable foraging habitats. Valley oak, Fremont cottonwood, walnut, and large willows with an average height of about 58 feet, and ranging from 41 to 82 feet, are the most commonly used nest trees in the Central Valley (CDFW 2007), but eucalyptus is also commonly used. Swainson's hawks often nest peripherally to riparian systems of the valley as well as utilizing lone trees or groves of trees in agricultural fields. Suitable foraging areas include grasslands, pastures, alfalfa and other hay crops, and certain grain and row croplands. In the Central Valley, Swainson's hawks find suitable foraging habitat in such agricultural areas near suitable nest sites, however, nesting habitat is in decline due primarily to flood control projects, agricultural practices, and urban development. The current population of Swainson's hawk in California's Central Valley is estimated at 1,948 breeding pairs (CDFW 2007), with most of this population occurring in the area from Stanislaus County north to Butte County.

Occurrence in the Project Area. There are no trees located on the 207.8-acre Project Site, and no large trees capable of supporting nesting by Swainson's hawk in the immediate project vicinity, therefore it can be stated that Swainson's hawk does not nest in the immediate vicinity of the Project Site. The non-native grasslands and seasonal wetlands and swales found on the property provide suitable foraging habitat for Swainson's hawk that may nest away from the Project Site in areas nearby, and, indeed, a Swainson's hawk was observed foraging over the Project Site by HBG during a site reconnaissance conducted during the nesting season on April 16, 2021. The closest known nesting record for Swainson's hawk as reported in the CNDDB is a nest site last active in 2008 (CNDDB Occurrence No. 1718) located approximately 2.1 miles north of the Project Site. Eucalyptus and other large trees located within about 0.25 miles from the Project Site provide potential nesting habitat.

Biologists with Monk & Associates conducted a formal nesting survey for Swainson's hawk for the Napa Logistics Project (adjacent property to the north of the Giovannoni site) in 2016/2017 using California Department of Fish and Wildlife's Swainson's hawk survey guidelines (CDFG 2000). Swainson's hawk nesting surveys were conducted April 5 and June 10, 2016 and

February 27, 2017 for all potential habitats within a mile of the project site for the Napa Logistics Phase II project, and no Swainson's hawks or evidence of any raptor nesting was observed within a zone of influence of the Project Site. HBG wildlife biologist Emilie Strauss conducted a similar survey for nesting Swainson's hawk for the Giovannoni Logistics Project on April 16, 2021. Ms. Strauss covered approximately 10 miles of local roads to inspect trees within approximately one mile from the Giovannoni Project Site and, again, no Swainson's hawk nests or any other raptor nests were found. Swainson's hawk has been known to nest in the area north of American Canyon and southwest of the City of Napa, and future nesting in suitable nest trees as close as about 0.5 miles from the Giovannoni Logistics Project Site cannot be ruled out.

Northern Harrier

Background. The northern harrier (*Circus hudsonius*) is a state species of special concern. Northern harriers build grass-lined nests on the ground within dense, low-lying vegetation in a variety of habitats, though they are typically found nesting in grassland or marsh habitats. They usually nest on level to near level ground. This species is particularly vulnerable to ground predators such as coyotes (*Canis latrans*), red fox (*Vulpes vulpes*), and various snake species. Ground nesting birds in general are also subject to disturbance by agricultural practices.

Occurrence in the Project Area. The 207.8-acre Project Site provides suitable foraging habitat for northern harrier both for wintering individuals and for individuals that may find suitable nesting sites in the project area. The 207.8-acres of open grasslands and seasonal wetlands over the Project Site also provide suitable nesting habitat for northern harrier. A wintering northern harrier was observed foraging over the site by HBG biologists during an HBG field review conducted on December 10, 2020, and a northern harrier was also observed foraging over the project site during the nesting season on April 16, 2021, suggesting that the species may nest somewhere in the project vicinity.

Golden Eagle

Background. The golden eagle (*Aquila chrysaetos)* is designated as a Bird Species of Conservation Concern by the USFWS and is also listed as a Fully Protected species in California. The golden eagle is also protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c). Golden eagles are found breeding throughout western North America in remote open habitats. Typical habitats in North America include savannah woodland, grasslands, aspen parkland, high and low deserts, and taiga. Golden eagles feed on fresh carrion or take live prey ranging in size from small rodents to as large as newborn fawns. More typical prey includes rabbits, hares, and waterfowl. Golden eagles build nests in large trees, often eucalyptus, oaks, or conifers, or on large vertical cliffs. On rare occasions nests are found on the ground, especially in expansive prairie habitats where cliffs and/or trees are scarce. Often this species will return each year to the same nest site and reconstruct the existing nest structure. Golden eagles are very sensitive to disturbance near the nest site, particularly in remote regions where human activities are minimal.

Occurrence in the Project Area. There are no trees located on the 207.8-acre Project Site, and no large trees capable of supporting nesting by golden eagle in the immediate project vicinity, therefore it can be stated that golden eagle does not nest in the immediate vicinity of the Project Site. The non-native grasslands and seasonal wetlands and swales found on the property provide suitable foraging habitat for golden eagles that may nest away from the Project Site, as demonstrated by the presence of a foraging individual observed on the project site by an HBG biologist during a spring reconnaissance conducted on April 16, 2021. Eucalyptus and other large trees located within about 0.25 miles from the Project Site provide potential nesting habitat.

The closest known nesting record for golden eagle as reported in the CNDDB is a nest site (CNDDB Occurrence No. 82) located approximately 3.2 miles north of the Project Site in a eucalyptus tree surrounded by a vineyard. The CNDDB reports that this tree was cut down in 2008 and no longer provides a suitable golden eagle nest site. An additional nesting record is a nest site found by biologists with Monk & Associates approximately 4.5 miles east of the Project Site within the Newell Open Space within the City of American Canyon. This nest, also in a eucalyptus tree, was active in 2016 and 2017.

No nesting golden eagles (or nesting by any bird of prey species) were observed in large trees near the Project Site during formal nesting surveys for Swainson's hawk conducted by Monk & Associates in 2016/2017 for the Napa Logistics Project. Golden eagle was observed being harassed by Swainson's hawk and exhibiting foraging behavior over the Project Site during a spring survey by an HBG wildlife biologist on April 16, 2021. No nesting golden eagles were observed in the vicinity of the property during surveys for nesting Swainson's hawk conducted by biologists with HBG on that same date for the Giovannoni Logistics Project. As golden eagle has been known to nest in the general area of the City of American Canyon, future nesting in suitable nest trees as close as about 0.25 miles from the Project Site cannot be ruled out.

Burrowing Owl

Background. Burrowing owls (*Athene cunicularia*) are small terrestrial owls commonly found in open grassland ranging from western Canada to portions of South America. Burrowing owl habitat can be found in annual and perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. In California, burrowing owls most commonly use burrows of California ground squirrel, but they also may use man-made structures, such as cement culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. Burrowing owls may use a site for breeding, wintering, foraging, and/or migration stopovers during migration. While foraging, owls will perch on raised burrow mounds or other topographic relief such as rocks, tall plants, fence posts, and debris piles to attain better visibility. Occupancy of suitable burrowing owl habitat can be verified at a site by an observation of at least one burrowing owl, or, alternatively, presence of "decoration" at or near a burrow entrance which can include molted feathers, cast pellets, prey remains, eggshell fragments, or excrement.

The burrowing owl is a USFWS bird species of conservation concern and a California Department of Fish and Wildlife (CDFW) species of special concern (CDFW 2011). CDFW adopted survey protocol and mitigation guidelines for burrowing owls as described in a March 7, 2012 Staff Report (CDFW 2012).

The status of burrowing owl in the San Francisco Bay Area was summarized by Albion Environmental (2000) in a discussion included in the SCVHP. Nesting burrowing owls in the greater San Francisco Bay Area, and in the South Bay area in particular, are a dwindling resource. In the early 1990s there were an estimated 150–170 breeding pairs in the San Francisco Bay Area, representing a 53% decline from the previous census period of 1986–1990. More recent numbers indicate that, if anything, the downward trend is increasing. In those estimates it was assumed that 75% of the San Francisco Bay Area burrowing owl population occurred in Santa Clara County and that nearly all of those owls were congregated around the southern edge of the San Francisco Bay.

Occurrence in the Project Area. The Project Site and surrounding area were investigated for burrowing owls and burrowing owl habitat during site reconnaissance by HBG biologists on December 10, 2020 and April 16, 2021. No burrowing owls were observed on the Project Site by HBG biologists during these field visits, and the only location supporting ground squirrels was an area noted in the rubble pile and compost at the perimeter of Clark's Rocks along Green Island Road that supported several ground squirrels in the spring of 2021. Dens of Botta's pocket gopher and California vole were common throughout the site, but these burrows are not suitable for occupation by burrowing owl. A general lack of ground squirrel burrows and ground squirrel colonies suggests that the habitat currently does not support burrowing owl and is currently not suitable to support burrowing owl.

No burrowing owls were reported at the site by other biologists who have studied the site over the last 5 years, including Monk & Associates (conducted brachiopod surveys and rare plant surveys on the property in 2016 through 2018), LSA Associates (conducted dry season brachiopod surveys in 2016), and Rana Resources (conducted a CRLF habitat assessment in 2021). A small number of burrowing owls have been recorded in the CNDDB within the general project vicinity, with the nearest reports from as close as about 1.7 miles north of the Project Site and about 2.5 miles south. Burrowing owls do not currently occur on the Project Site, but future occupation of the species on the property cannot be ruled out, especially if the property were to be occupied by a greater number of California ground squirrels.

Tricolored Blackbird

Background. Tricolored blackbird (*Aegelaius tricolor*) is listed as endangered under the California Endangered Species Act. Tricolored blackbird is also currently designated as a state species of special concern and is designated by the USFWS as a Bird Species of Conservation Concern. Tricolored blackbird is a highly colonial nesting species that breeds near freshwater, preferably in emergent wetlands with tall, dense growth of cattails or tules. Even when the preferred nesting substrates are available, other vegetation may be used for nesting including

sedges, nettles, willows, thistles, mustard, blackberry, wild rose, foxtail grass or barley. Since the 1970s with declines in populations, nesting in cereal crops and dairy silage has been documented. Tricolored blackbird foraging areas include rangeland, fields of alfalfa or cut hay, or irrigated pastures with an abundance of insects.

Occurrence in the Project Area. Tricolored blackbird has been known to occur in the vicinity of the Project Site. The nearest documented nesting colony to the Project Site is a colony of about 250 birds that nested in 1993 in two freshwater ponds vegetated with cattails, bulrush and willows located along Highway 29 just about 0.25 miles northeast of the northern border of the Project Site.

HBG conducted an evaluation of the habitat conditions at the proposed Project Site to determine if nesting substrate for a tricolored blackbird nesting colony is present in the project area. Preferred nesting habitat for tricolored blackbird was found not to be present as vegetation that typically provides suitable substrate for a tricolored blackbird nesting colony was not observed. Suitable tricolored blackbird nesting habitat typically consists of certain vegetation to include cattails, bulrushes, willows, blackberries, thistles, or nettles. As detailed in Section 4.4 (Plant Communities), dominant vegetation within the seasonal wetlands found on the property does not include a suite of species that would be conducive to tricolored blackbird nesting. Although sparse growth of some thistles and blackberries is present, few cattails, and no bulrushes, or willows, which are preferred nesting substrates, are present. Suitable nesting habitat for tricolored blackbird does not occur within the Project Site.

5.0 BIOLOGICAL IMPACTS AND MITIGATION MEASURES

5.1 Standards of Significance

The City of American Canyon's environmental review process pursuant to CEQA will evaluate the proposed Project east of Devlin Road with a Project Specific level of analysis based on site plans developed for the project, and the Phase 2 west of Devlin Road at a Program Level based on conceptual plans for the property if development were to occur in the future. The analysis for the proposed Project is independent from the Phase 2. When and if Phase 2 moves forward an addendum to the EIR will need to be conducted and the project will be re-evaluated based on the specifics and any new environmental or CEQA issues that will need to be assessed.

According to CEQA Guidelines (Appendix G), the project would be considered to have a significant impact on biological resources if it would:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Wildlife and Game or U.S. Fish and Wildlife Service.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5.2 Impacts and Mitigation Measures

1) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special Status Plants

Although no special-status plants were identified on the Project Site by Monk & Associates while conducting various studies on the property in 2016, including an aquatic resources delineation and other evaluations conducted during the March to July flowering season of 2016, these studies did not constitute protocol surveys. A determination regarding whether special status plant species are present in proposed development areas can only be made based on systematic rare plant surveys conducted during the flowering period of target plant species. Therefore, HBG has retained Dr. Brent Helm to conduct protocol rare plant surveys during the 2021 flowering season. These surveys are currently underway, and a special status plant survey report is expected to be completed by July of 2021.

Impact 1: If protocol surveys show that special status plant species are present in areas of proposed development, impacts to populations of rare (special status) plants are possible.

> **Mitigation Measure 1-1:** If protocol rare plant surveys conducted during the spring and summer of 2021 show special status plant species are present within or in close proximity to areas of proposed development, mitigation to conserve and/or protect populations of rare plants may be warranted. Such mitigation measures could include avoidance of rare plant populations in the design of project development, and if avoidance of populations is not possible, mitigation measures could require transplanting of plants or development of plans to recover seeds and establish populations to nearby suitable habitats within the approximately 44.8-acre Wetland Preserve.

Special Status Animals

Monarch Butterfly. No trees are present on the Project Site so there is no possibility for the presence of a monarch overwintering site at the site. Several biologists have studied the site or portions of the site, and none have reported the presence of milkweed plants of the genus *Asclepias* that serve as the larval host plant for monarchs. No suitable habitat for monarch butterflies is found on the site, therefore, no potentially significant impacts to monarch butterflies would result from construction of the Giovannoni Logistics Center Project or any future development within a Phase 2.

Vernal Pool Fairy Shrimp. Based on completed protocol surveys for vernal brachiopods (LSA 2016, Monk & Associates 2017), it is clear that the federally listed threatened vernal pool fairy

shrimp does not occur on the Project Site. Therefore, no impacts to vernal pool fairy shrimp would result from construction of the proposed project. No mitigation is warranted for vernal pool fairy shrimp for either the Giovannoni Logistics Center Project or any future development for a Phase 2.

California Red-legged Frog. A protocol Habitat Assessment prepared for the Project Site by Rana Resources found that the Project Site lacks habitat necessary to support CRLF. All records of CRLF from the CNDDB in the project area are from areas east of Highway 29, which forms a barrier to potential movements of CRLF onto the site. Additionally, the Project Site is completely isolated from all areas to the east by Highway 29 by urban infrastructure, and there are no hydrologic connections with any stream channels off-site to the east of Highway 29. Finally, there is no suitable breeding or rearing habitat for CRLF on site due to the shallow and ephemeral nature of the seasonal wetlands and the lack of any suitable riparian vegetation for cover. CRLF do not occupy the Project Site, and the proposed Project would have no significant impacts on California red-legged frogs. No mitigation is warranted for this species for either the Giovannoni Logistics Center Project or any future development for a Phase 2.

Western Pond Turtle. Suitable habitat for western pond turtle does not occur on the site due to the shallow and ephemeral nature of the seasonal wetlands, which are inundated for only about 3 to 4 months out of the year and even less in drought years. Surrounding uplands of suitable shrub/woodlands and appropriate basking sites are also lacking. Western pond turtle does not occupy the Project Site. No impacts to western pond turtle would result from development of the Project. Mitigation measures for western pond turtle are not warranted for either the Giovannoni Logistics Center Project or any future development for a Phase 2.

Swainson's Hawk. There are no trees located on the Project Site, and no large trees capable of supporting nesting by Swainson's hawk in the immediate project vicinity, however, the non-native grasslands and seasonal wetlands and swales found on the property provide suitable foraging habitat for Swainson's hawks that may nest away from the Project Site. Swainson's hawk was observed foraging on the site in spring 2021. Development of the Project will remove some foraging area for this species, but the establishment of the 44.8-acre Wetland Preserve will preserve a 44.8-acre area of suitable Swainson's hawk foraging habitat into perpetuity. Although eucalyptus and other large trees located within about 0.25 miles from the Project Site provide potential nesting habitat, no nesting by Swainson's hawk (or any raptor species) was noted during surveys for nesting Swainson's hawk conducted by HBG in April of 2021.

If an active Swainson's hawk nest is found on or adjacent to the Project Site or within the area of influence of the Project Site (which is generally considered to be within 1,000 feet), CDFW could require that project-related disturbance at active nest sites be reduced or eliminated during the period from March 1- September 15 (CDFW 2000). If Swainson's hawk was found to be nesting within a zone of influence during the construction period, potential impacts to this species could occur, including disturbance to nesting birds and possible mortality of adults and/or young. If nest disturbances are anticipated to occur, a Fish and Game Section 2081 management

authorization would be required. Preconstruction nesting surveys are warranted for either the Giovannoni Logistics Center Project or for any future development of a Phase 2 to ensure that the proposed Project will not impact this hawk species.

Impact 2: Project construction could impact nesting Swainson's hawk if individuals of this species were found to be nesting within 1,000 feet of project construction.

> **Mitigation Measure 2-1:** The mitigation measure for the possibility of nesting Swainson's hawk in the project vicinity should be as required by Monk & Associates (2018) in the Biological Resources Analysis for the Devlin Road/Vine Trail Extension Project, included (Appendix C of the Initial Study/Proposed Mitigated Negative Declaration for the project) and for the Biological Resources Analysis for the Green Island Road Reconstruction and Widening Project (Monk 2019) (Appendix C of the Initial/Study Proposed Mitigated Negative Declaration for the project) as summarized below:
>
> Preconstruction surveys for Swainson's hawk shall be conducted in the Project Site vicinity prior to initiation of project construction activities. These preconstruction surveys should include investigation of all potential nesting trees within a half-mile radius around all project activities and shall be completed for at least two survey periods immediately prior to commencement of Project construction. Surveys should follow CDFW guidelines for conducting surveys for Swainson's hawk (CDFW 2000) that were developed by the Swainson's Hawk Technical Advisory Committee to maximize the potential for locating nesting Swainson's hawks and reduce the potential for nest failures as a result of project activities and/or disturbances.
>
> If Swainson's hawks are found to be nesting within 1,000 feet of the project site, the applicant shall consult with CDFW to determine if a Fish and Game Section 2081 management authorization shall be obtained from CDFW. A nest site buffer shall be established in consultation with the CDFW or as required in any Fish and Game Section 2081 management authorization issued to the project by the CDFW. An established buffer zone of a minimum of 500 feet from a nest site would be typical. The nest protection buffer shall be maintained until the Swainson's hawk nesting attempt is completed as determined by a qualified biologist.

Golden Eagle. There are no trees located on the Project Site, and no large trees capable of supporting nesting by golden eagle in the immediate vicinity of the Project Site, however, the non-native grasslands and seasonal wetlands and swales found on the property provide suitable foraging habitat for golden eagles that may nest away from the Project Site. Golden eagle was observed exhibiting foraging behavior on the site in spring 2021. Although eucalyptus and other large trees located within about 0.25 miles from the Project Site provide potential nesting habitat, no nesting by golden eagle (or any raptor species) was noted during surveys for nesting Swainson's hawk conducted by HBG in April of 2021.

As golden eagle has been known to nest in the general area of the City of American Canyon, future nesting in suitable nest trees as close as about 0.25 miles from the Giovannoni Logistics Project Site cannot be ruled out. If a golden eagle were found to be nesting within a zone of influence of the project during the construction period, potential impacts to this species from the proposed project could occur, including disturbance to nesting birds and possible mortality of adults and/or young. Preconstruction surveys for golden eagle are warranted for either the Giovannoni Logistics Center Project or for any future development of a Phase 2 to ensure that construction activities do not result in impacts to nesting individuals of this species. With a requirement of preconstruction surveys, a potentially significant impact on golden eagle could be mitigated to a level considered less than significant.

Impact 3: Project construction could impact nesting golden eagle if individuals of this species were found to be nesting in the vicinity of project construction.

> **Mitigation Measure 3-1:** The mitigation measure for the possibility of nesting golden eagle in the project vicinity should be as required by Monk & Associates (2018) in the Biological Resources Analysis for the Devlin Road/Vine Trail Extension Project, included as Appendix C of the Initial Study/Proposed Mitigated Negative Declaration for the project as summarized below:
>
> Preconstruction golden eagle nesting surveys shall be conducted in the Project Site vicinity within 30 days of initiation of project construction activities. Preconstruction surveys should include investigation of all potential nesting trees within a half-mile radius around all project activities. If active nests of golden eagles are identified within eucalyptus trees or any other trees within a 0.5-mile radius of the project site, a qualified raptor biologist will establish a protection buffer that is adequate to ensure that noise or activity from the project would not cause nest disturbance or mortality of young birds or adults. Buffer zones may be variable in size as some golden eagles are more acclimated to disturbance than others. Size of buffer zone could be modified in consultation with CDFW considering behavioral factors and the extent that golden eagles may have acclimated to disturbance. No construction or earth-moving activity shall occur within the established buffer zone until it is determined by a qualified raptor biologist that the young golden eagles have fledged or that the nesting cycle is otherwise determined to be complete based on monitoring of the active nest by a qualified biologist.

Northern Harrier. Suitable nesting habitat for the northern harrier (a state designated species of special concern) occurs within the non-native grasslands and seasonal wetlands and swales found within the Project Site. Northern harrier individuals were observed foraging over the Project Site during both winter and spring (breeding) seasons during surveys conducted by HBG. If a northern harrier were found to be nesting on the Project Site during the construction period, potential impacts to this species from the proposed project could occur, including disturbance to nesting birds and possible mortality of adults and/or young. Nesting by northern harrier has not been documented on the Project Site, but nesting by this species at the site is possible.

Preconstruction surveys for northern harrier are warranted for either the Giovannoni Logistics Center Project or for any future development of a Phase 2 to ensure that construction activities do not result in impacts to nesting individuals of this species.

Impact 4: Construction of the proposed project could result in disruption of northern harrier nesting if the species were found to be nesting during the construction period.

> **Mitigation Measure 4-1:** The mitigation measure for the possibility of nesting Northern harrier in the project vicinity should be as required in the Biological Resources Analysis for the Devlin Road/Vine Trail Extension Project (Monk 2018)(Appendix C of the Initial Study/Proposed Mitigated Negative Declaration for the project) as summarized below:
>
> Prior to ground disturbance, a preconstruction nesting survey shall be conducted for northern harrier if construction is scheduled during the nesting season (February 1 through September 1). To determine if northern harrier is nesting onsite, a qualified raptor biologist(s) shall conduct walking transects through the Project Site grassland habitat searching for nests. An active northern harrier nest must be protected by implementing a suitable 500-foot radius buffer zone around the nest marked with orange construction fencing. If an active nest is located outside of the Project Site, the buffer should be extended onto the Project Site and demarcated where it intersects the Project Site. Size of buffer zone could be modified in consultation with CDFW considering behavioral factors and the extent that northern harriers may have acclimated to disturbance. No construction or earth-moving activity shall occur within the established buffer zone until it is determined by a qualified raptor biologist that the young have fledged or that the nesting cycle is otherwise determined to be complete based on monitoring of the active nest by a qualified biologist.

Burrowing Owl. A small number of burrowing owls have been recorded in the CNDDB within the general project vicinity, with the nearest reports from as close as about 1.7 miles north of the Project Site and about 2.5 miles south. No burrowing owls or occupied California ground squirrel burrows were observed on the Project Site during a field reviews conducted by HBG in December 2020 and April 2021 or during previous biological studies conducted by Monk & Associates, LSA Associates or Rana Resources. The only observed ground squirrels were from the area around the perimeter of Clark's Rocks. It remains possible that ground squirrels could establish colonies on the site in the future prior to project construction, providing new occupiable habitats for burrowing owl. Future use of the site by burrowing owl cannot be ruled out.

Impact 5: Project construction could impact burrowing owl if California ground squirrels were to occupy the site in the future, providing occupiable sites for wintering or nesting by burrowing owl. The following mitigation measure would ensure that no burrowing owls would be impacted by construction activities associated with either the Giovannoni Logistics Center Project or for any future development of a Phase 2.

Mitigation Measure 5-1: Pre-construction surveys for burrowing owls shall be conducted prior to any ground-disturbance to ensure that there are no impacts to burrowing owls. The pre-construction surveys will be conducted within two weeks prior to the onset of any ground disturbing activities. Surveys will be conducted by a qualified biologist following CDFW survey methods (CDFW 2012) to establish the status of burrowing owl on the Project Site.

- If burrowing owls are found to occupy the Project Site during the non-breeding season (September 1 to January 31), occupied burrows will be avoided by establishing a no-disturbance buffer zone around the burrow determined per the CDFW 2012 staff report. If avoidance is not possible a passive relocation effort may be instituted to relocate the individual(s) out of harm's way pursuant to a Burrowing Owl Exclusion Plan prepared in accordance with the CDFW 2012 staff report.

- If burrowing owls are found to be present during the breeding season (February 1 to August 31), the project ground disturbing activities will follow the CDFW recommended avoidance protocol whereby occupied burrows will be avoided with a no-disturbance buffer.

Tricolored Blackbird. No impact to tricolored blackbird nesting colonies would occur as a result of the proposed project. Although tricolored nesting colonies have been documented about 0.25 miles from the Project Site as recently as 1993, HBG has concluded that vegetative characteristics of preferred nesting habitat for tricolored blackbird does not occur at the Project Site. Suitable nesting habitat for tricolored blackbird does not occur within the Project Site, therefore, no impacts to tricolored blackbird nesting colonies would result from implementation of the proposed project.

2) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

The proposed Project development east of Devlin Road would impact approximately 0.496-acres of palustrine emergent wetlands. If or when Phase 2 west of Devlin Road is developed, approximately 3.7-acres of palustrine emergent wetlands may be impacted. Plans for wetland mitigation, including the preservation of an approximately 44.8-acre Wetland Preserve to include existing wetlands as well as established/created wetlands intended to offset wetland impacts of buildout development of the Project Site, are discussed in response to Item #3.

The portion of the Project Site along the northern boundary contained within the confines of No Name Creek would be subject to the regulatory jurisdiction of the CDFW under Fish and Game Code Section 1602. As the area of No Name Creek is contained within the approximately

44.8-acre Wetland Preserve, no impacts to the palustrine emergent wetland swale associated with No Name Creek would occur from either the proposed Project in the area east of Devlin Road or any possible future development that might occur within Phase 2 in the area west of Devlin Road. No impacts would occur to areas that would be subject to CDFW jurisdiction under Fish and Game Code Section 1602, therefore, there would be no requirement to obtain a Streambed Alteration Agreement from CDFW.

3) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Wetland Impacts. Development of the proposed Project within the area east of Devlin Road will result in impacts to wetlands subject to USACE jurisdiction as a Water of the U.S. (WOUS) and subject to SFBRWQCB jurisdiction as a Water of the State (WOS). Grading activities associated with the proposed Project would result in the permanent placement of fill material (soil) into 0.496 acres of palustrine emergent wetlands considered WOS. Of this 0.496 acres of impacts to WOS, the USACE has determined 0.492 acres are isolated and not considered WOUS. Therefore, the proposed Project will also impact 0.004 acres of palustrine emergent wetlands considered WOUS. The location of wetland impacts associated with development of the proposed Project in the area east of Devlin Road is shown in Figure 5. The City of American Canyon processed a separate Nationwide Permit for impacts to 0.21 acres on the 8.3-acre Project Site for the Devlin Road/Vine Trail Extension project.

An enumeration of the wetland impacts within the proposed Project development is detailed in Table 2.

Table 2. Wetland Impacts

Isolated Wetland (IW)	**Square Feet / Acres**
IW-2	97 / 0.002
IW-3	229 / 0.005
IW-4	3117 / 0.072
IW-5	17019 / 0.391
IW-6	935 / 0.022
USACE Jurisdictional Wetlands	
W-89	189 / 0.004
Total	**21,586 / 0.496**

These wetland impacts will require that the applicant apply for and obtain a Nationwide Permit from USACE for discharge within 0.004 acres of wetlands under Clean Water Act Section 404 jurisdiction. A plan to compensate for impacts to wetlands would also be required. In addition, an accompanying Section 401 Water Quality Certification from the SFBRWQCB would be

required for the USACE permit to be valid. Such a project would also require a separate Waiver of Waste Discharge from the SFBRWQCB for impacts to 0.496 acres of waters of the state.

If the applicant were to pursue a similar warehouse logistics center development as a second phase of development on the remaining 85.9 acre area on the west side of the Devlin Road Extension, such a development would impact up to approximately 3.7 acres of wetlands considered both WOUS and WOS, assuming buildout of Phase 2. The location of these wetland impacts is shown in Figure 6. A project impacting more than 0.5 acres of wetlands would require an Individual Permit rather than Nationwide Permit from USACE. Impacts to wetlands totaling 3.7 acres for a possible Phase 2 project in the future would require that the applicant submit a separate application for an Individual Permit from USACE. The application would require a plan to compensate for wetland losses as well as a detailed alternatives analysis under the Section 404(b)(1) guidelines. Such a development on the Phase 2 portion of the Project Site would also require a Clean Water Act Section 401 Water Quality Certification from the SFBRWQCB for the USACE permit to be valid and would also require a Waiver of Waste Discharge Requirements from SFBRWQCB pursuant to the Porter-Cologne Water Quality Control Act.

Wetland Mitigation and Monitoring Plan. As part of this Project an approximately 44.8-Acre Wetland Preserve fronting the northern boundary of the Project Site will be preserved. This Wetland Preserve supports 7.71 acres of the palustrine emergent wetlands out of the existing 12.77 acres of wetlands found on the entirety of the Project Site. Within the Wetland Preserve, the applicant intends to create approximately 0.992 acres of wetlands to offset wetlands impacts of the proposed Project (0.496 acres) at a 2:1 ratio, and to create and an additional 3.7-acres of wetlands that will offset wetlands impacts associated with possible development of a Phase 2 project at a 1:1 ratio. Wetlands created within the Wetland Preserve would include 0.992 acres of wetland mitigation to compensate for wetlands impacts of the proposed Project in the area east of Devlin Road and approximately 3.7 acres of wetland mitigation to compensate for wetland impacts of a potential Phase 2 in the area west of Devlin Road. If additional wetland mitigation lands are required to compensate for wetland impacts associated with Phase 2, wetlands will be created on appropriate mitigation land, approved by the RWQCB and USACE, within the Phase 2 project site's HUC 10 watershed. Wetlands created to compensate for an eventual Phase 2 project would be constructed and monitored with performance standards prior to the implementation of Phase 2 and incorporated into the Wetland Mitigation and Monitoring Plan associated with the Project and protected in perpetuity. This will allow for the created wetlands to establish and function as wetlands and be protected prior to project development of Phase 2, if such development were to happen at all. This allows Phase 2 to provide a 1:1 mitigation ratio compared to the proposed Project which is establishing/creating wetlands concurrent with Project development and therefore must account for temporal loss of wetland functions and values as the wetlands develop over time.

Wetlands created within the approximately 44.8-acre Wetland Preserve as part of the Mitigation Plan would total approximately 4.7 acres of created wetlands. Figure 9 shows a

Wetland Mitigation Site Plan for the general location of the 44.8-acre Wetland Preserve in relation to the Project Site as well as the location of proposed mitigation wetlands in relation to existing wetlands.

A conceptual Wetland Mitigation and Monitoring Plan (Plan) is described herein to compensate for the loss of 0.496 acres of wetlands as a result of implementing the proposed Project in the area east of Devlin Road as shown on Figure 5, and a detailed Plan will be prepared and submitted to the SFBRWQCB for review as part of the process for obtaining a permit from this agency. In addition, the Plan will address the approximate impact to 3.7 acres of wetlands that may occur in the future as part of a Phase 2, assuming Phase 2 is built out. The approximately 44.8 acres of open space on the east and west side of Devlin Road would be preserved to create a contiguous open space area with the adjoining 37-acre Napa Logistics Park wetland preserve. The Plan will include a site protection instrument (e.g., deed restriction or conservation easements) that will restrict use of the Wetland Preserve area to offset wetland impacts for both the 0.992 acres of created wetlands for the proposed Project as well as the created approximately 3.7 acres of additional wetlands for a potential Phase 2 project. Regardless of whether or not Phase 2 is implemented, a long-term endowment would be fully funded by the proposed Project to manage the entire 44.8-acre open space preserve and both existing and created wetlands in perpetuity.

The Plan will be prepared in accordance with the Subpart J – Compensatory Mitigation for Losses of Aquatic Resources outlined in the State Water Resources Control Board Procedures, and in accordance with the State Water Resources Control Board *Implementation Guidance* dated April 2020. The basic objective of the Plan is to ensure that the project wetland impacts, and compensatory mitigation proposed to offset the wetland impacts, will provide an increase in the overall abundance of wetlands (e.g. increase in acreage), and the created wetlands will have an overall increase in plant diversity and structural complexity compared to the wetlands that will be filled. The purpose is to ensure the Plan offsets the permanent wetland impacts, and any temporal loss of function attributed to the Project and future Phase 2 development, assuming Phase 2 is built out. In summary, the Plan will:

1. Establish within the Wetland Preserve 0.992 acres of palustrine emergent wetlands in advance of or concurrent with implementation of Project impacts to 0.496 acres of palustrine emergent wetlands at a 2:1 ratio.
2. Establish within the Wetland Preserve approximately 3.7 acres of palustrine emergent wetlands in advance of implementation of future Phase 2, assuming Phase 2 is built out, to address the potential maximum losses of approximately 3.7 acres of wetlands that may occur. If additional wetland mitigation lands are required to compensate for wetland impacts associated with Phase 2, wetlands will be created on appropriate mitigation land, approved by the RWQCB and USACE, within the Phase 2 project site's HUC 10 watershed.

3. In select areas, install native trees and shrubs to enhance the upland buffer areas adjacent to the established wetlands. The site is lacking vertical biotic structure likely due to past grazing activities. As part of the Plan, native trees and shrubs will be planted in select areas to enhance the upland buffer areas adjacent to established and existing wetlands.
4. Provide financial assurances to ensure a high level of confidence that the compensatory mitigation will be successfully completed, in accordance with applicable performance standards.
5. Design ecological performance standards to assess whether the Plan is achieving the overall objectives, so that it can be objectively evaluated to determine if it is developing into the desired resource type, providing the expected conditions or function, and attaining any other applicable metrics such as acres, percent cover of native plants, structural patch richness, control of invasive plants, water depth etc.
6. Monitor the site for a duration necessary to determine if the Plan is meeting the performance standards. Established palustrine emergent wetlands typically develop quickly and a 5 year monitoring period would be sufficient to determine if performance standards are met. This monitoring period may be extended if performance standards are not met due to how the wetlands were constructed or natural events such as severe droughts.
7. Protect the approximately 44.8 acre Wetland Preserve in perpetuity using a site protection instrument such as a deed restriction or conservation easement, and provide an endowment sufficient to fund the Long-Term Management Plan; and
8. Assess the potential effects of changing weather patterns that are currently occurring, and that may occur due to climate change in the foreseeable future and how these changes may impact the long-term viability of the constructed wetlands. The purpose of this assessment is to locate and design the wetlands to avoid and minimize impacts from climate change and to develop adaptive management measures into the Plan specifically to minimize these potential effects.

The Plan will include a watershed profile of the evaluation area which, for the purpose of this Project, will encompass the approximate watershed area of No Name Creek. In addition, an overall assessment of the condition of the wetlands that will be filled by the Project will be conducted. Using the California Rapid Assessment Method (CRAM) for depressional wetlands, or a hybrid approach based on CRAM, each similar wetland type that may be impacted will be assessed to describe and measure the plant community/diversity composition, hydrology source and connectivity within the watershed, physical structure such as topographic complexity and physical features that may provide habitat for aquatic species, plant zones within the wetlands, maximum water depth, and stressors that may be indirectly affecting the wetlands that will be filled by the Project. The purpose of this assessment is to ensure the design of the wetlands will provide a similar or more complex and diverse habitat as the

wetlands prior to being filled and to ensure the performance standards proposed in the Plan will be able to measure the success of the newly established wetlands.

Impact 6: Grading activities would result in the permanent placement of fill material (soil) into 0.496 acres of palustrine emergent wetlands considered WOS under the Porter-Cologne Water Quality Control Act. Of the 0.496 acres of WOS, the USACE has determined 0.492 acres are isolated and not considered WOUS under the federal Clean Water Act, so the proposed Project would also impact the remaining 0.004 acres of palustrine emergent wetlands considered WOUS. These impacts will require that the applicant apply for and obtain a Nationwide Permit from USACE for discharge within 0.004 acres of wetlands under Clean Water Act Section 404 jurisdiction along with an accompanying Section 401 Water Quality Certification from the SFBRWQCB. The applicant will also need to apply for and obtain a separate Waiver of Waste Discharge from the SFBRWQCB for impacts to 0.496 acres of Waters of the State.

> **Mitigation Measure 6-1**: The Project applicant for the proposed Giovannoni Logistics Center Project will apply for and obtain a Nationwide Permit from the San Francisco District of USACE for discharge within 0.004 acres of wetlands/Waters of the U.S. under Clean Water Act Section 404 jurisdiction. For the USACE permit to be valid, the applicant will apply for and obtain the accompanying Section 401 Water Quality Certification from the SFBRWQCB. The applicant will apply for and obtain a separate Waiver of Waste Discharge Requirements from the SFBRWQCB for impacts to 0.496 acres of waters of the state.
>
> **Mitigation Measure 6-2:** A detailed Wetland Mitigation and Monitoring Plan will be prepared and submitted to the SFBRWQCB for review as part of the process for obtaining a permit from the agency. The Wetland Mitigation and Monitoring Plan will address the loss of 0.496 acres of wetlands impact due to the proposed Project as well as the potential loss of approximately 3.7 acres of wetlands that may occur in the future as part of a Phase 2, assuming Phase 2 is built out. The Wetland Mitigation and Monitoring Plan will include a site protection instrument (e.g., deed restriction or conservation easements) that will restrict use of both the 0.992 acres of created wetlands for the proposed Project as well as approximately 3.7 acres of additional wetlands created for a potential Phase 2 project. The Wetland Mitigation and Monitoring Plan will also include a long-term endowment that would be fully funded by the proposed Project to manage approximately 44.8-acre open space preserve and created wetlands in perpetuity. If additional wetland mitigation lands are required to compensate for wetland impacts associated with Phase 2, wetlands will be created on appropriate mitigation land, approved by the RWQCB and USACE, within the Phase 2 project site's HUC 10 watershed.

Impact 7: If the applicant were to pursue a development within the Phase 2 area, such a development would impact approximately 3.7 acres of wetlands considered both WOUS and WOS, assuming buildout of Phase 2. Impacts to approximately 3.7 acres of wetlands for a

possible Phase 2 project would require that the applicant submit a separate application for an Individual Permit from USACE to include a plan to compensate for wetland losses as well as a detailed alternatives analysis under the Section 404(b)(1) guidelines to include a detailed evaluation of both onsite and offsite alternatives for the proposed project. Such a development on the Phase 2 portion of the Project Site would also require a Clean Water Act Section 401 Water Quality Certification from the SFBRWQCB for the USACE permit to be valid and would also require a Waiver of Waste Discharge Requirements for SFBRWCB pursuant to the Porter-Cologne Water Quality Control Act.

> **Mitigation Measure 7-1**: The project applicant for a future development in the Phase 2 area west of Devlin Road will apply for and obtain an Individual Permit from the San Francisco District of USACE for the placement of fill material within approximately 3.7 acres of wetlands/Waters of the U.S. under Clean Water Act Section 404 jurisdiction. For the USACE permit to be valid, the applicant will apply for and obtain the accompanying Section 401 Water Quality Certification from the SFBRWQCB. The applicant will apply for and obtain a separate Waiver of Waste Discharge Requirements from the SFBRWQCB for the discharge of fill material within approximately 3.7 acres of Waters of the state.

4) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Although a number of wildlife species, including a variety of bird species that potentially include special status species, were observed on the property during field surveys, neither the development of the proposed Project nor potential development of a future Phase 2 project would result in significant impacts to wildlife populations on the site. Mitigation measures to address impacts to sensitive habitats, most notably seasonal wetlands, are included herein that include the preparation and implementation of a detailed Compensatory Wetland Mitigation Plan. The site design includes the preservation of the approximately 44.8-acre Wetland Preserve that will preserve 7.71 acres of existing wetlands but will also include creation of approximately 4.7 additional wetland acres. Potential impacts to special status avian species will be mitigated as the applicant for either the proposed Project or future potential development of a Phase 2 is required herein to conduct preconstruction surveys for nesting by special status bird species including Swainson's hawk, golden eagle, northern harrier, and burrowing owl.

Any species of fauna that may be displaced during preparation of the site for development of the proposed Project or the possible development of a Phase 2 project should find nearby available habitats, including habitats within the approximately 44.8-acre Wetland Preserve or adjacent and contiguous 37-acre preserve for the Napa Logistics Project on the adjacent property. The major wildlife corridor along No Name Creek will remain unaffected as the entirety of No Name Creek will be incorporated into the Wetland Preserve. The project will not result in substantial change in animal populations at the site, nor will it cause a fish or wildlife population to drop below self-sustaining levels.

Nesting Birds. Nesting bird species protected by the federal Migratory Bird Treaty Act or California Fish and Game Code could be impacted during project construction. Work related to construction involving the removal of vegetation during the February 1 to August 1 breeding season of birds could result in mortality of nesting avian species if they are present. Many species of raptors (birds of prey) are sensitive to human incursion and construction activities, and it is necessary to ensure that nesting raptor species are not present in the vicinity of construction sites.

To ensure compliance with the MBTA and the California Fish and Game Code, bird nesting surveys are generally required if construction work requires vegetation removal during the bird nesting season. CDFW generally considers the nesting season to be from February 1 to August 31 for most bird species. Required setbacks to protect active nests from construction activity are usually in the order of about 250 feet for passerines (songbirds) and 500 feet or more for raptors (birds of prey).

Habitats within the Project Site were shown to support a number of bird species during field surveys conducted in the winter and spring of 2021 by HBG. The onsite grasslands and seasonal wetlands provide suitable nesting substrate for a number of species. Many of the bird species documented on or near the site as described in Section 4.4 could possibly nest within the vegetation in the onsite grasslands or seasonal wetlands. If active nests were present in this vegetation during construction operations on the Project Site, direct or indirect impacts could occur to nesting bird species protected by the Migratory Bird Treaty Act or the California Fish and Game Code as a result of construction activity.

Impact 8: The removal of vegetation during the February 1 to August 31 breeding season, either for the proposed Project or for a potential future Phase 2 development, could result in mortality of nesting avian species if they are present.

> **Mitigation Measure 8-1:** If construction is to be conducted during the breeding season of migratory birds (February 1 to August 31), a qualified biologist should conduct a pre-construction breeding bird survey in areas of suitable habitat within 15 days prior to the onset of construction activity. Nesting bird surveys should cover the project footprint and adjacent areas. If bird nests are found, appropriate buffer zones should be established around all active nests to protect nesting adults and their young from direct or indirect impacts related to project construction disturbance. Size of buffer zones should be determined per recommendations of the qualified biologist based on site conditions and species involved. Buffer zones should be maintained until it can be documented that either the nest has failed, or the young have fledged.

Water Quality. Construction activities for the proposed project will occur in within 0.496 acres of wetlands subject to State jurisdiction and in close proximity to areas within the upper reaches of No Name Creek, but water quality impacts to these features would not be significant

for several reasons. The requirement for the implementation of a Stormwater Pollution Prevention Plan (SWPPP), with identification of proper construction techniques and Best Management Practices (BMPs) will be required and will provide assurance that water quality of nearby waterways is not affected by onsite construction activities. In particular, silt fence and straw wattles will be installed along portions of the Project Site to maintain levels of water pollutants migrating offsite. In addition, vegetation will only be cleared from the permitted construction footprint. Areas cleared of vegetation, pavement, or other substrates should be stabilized as quickly as possible to prevent erosion and runoff. These requirements would be germane to any development for the proposed Project or for potential development of a Phase 2 west of Devlin Road.

Grading, excavation, placement of fill material, and other ground-disturbing activities associated with construction activities within the Project Site will not promote erosion that would allow elevated levels of sediment to wash into aquatic areas downstream, including No Name Creek, where such pollutants could result in potential impacts to fish and wildlife resources. Indirect impacts to resident animal populations in downstream areas would not result from the proposed project due to elevated turbidity levels from increased sedimentation or increases in other contaminants in stormwater runoff.

5) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project would not conflict with any local policies related to protection of natural resources. No trees are present on the Project Site so no trees would need to be removed to accommodate either the proposed Project or any future development within Phase 2.

All work for the Project would take place consistent with biological requirements of the General Plan and Zoning Ordinance of the City of American Canyon. This Biological Resources Report provides the detailed assessment of biological resources required by General Plan Policies 8.1.1 and 8.1.4. Studies of sensitive biological resources have been either conducted by HBG as part of this Biological Resources Report or were conducted by other consultants and independently reviewed and incorporated into the Biological Resources Report, consistent with General Plan Policy 8.2.1. Studies conducted by HBG include a protocol Phase 1 Habitat Assessment for the federally listed threatened California red-legged frog, surveys for state listed threatened Swainson's hawk and rare plant surveys, currently underway, by Dr. Brent Helm during the 2021 flowering season. Studies conducted by others include wet and dry season protocol surveys for the federally listed threatened vernal pool fairy shrimp and rare plant surveys. The proposed project results in impacts to seasonal wetlands and the applicant has prepared a conceptual plan to mitigate for these wetlands consistent with General Plan Policies 8.3.1.a, 8.3.1.h and 8.4.3. The wetland mitigation would be accomplished through establishment of an approximately 44.8-acre Wetland Preserve within the Project Site to include 7.71 acres of existing wetlands and creation of an additional 4.7 acres of seasonal wetlands to compensate for onsite losses from the proposed Project and from a potential future development project within Phase 2.

6) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not within an area where the provisions of a Habitat Conservation Plan or Natural Community Conservation Plan would apply.

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ATTACHMENT 1.

Figures

Figure 1. Regional Location Map
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

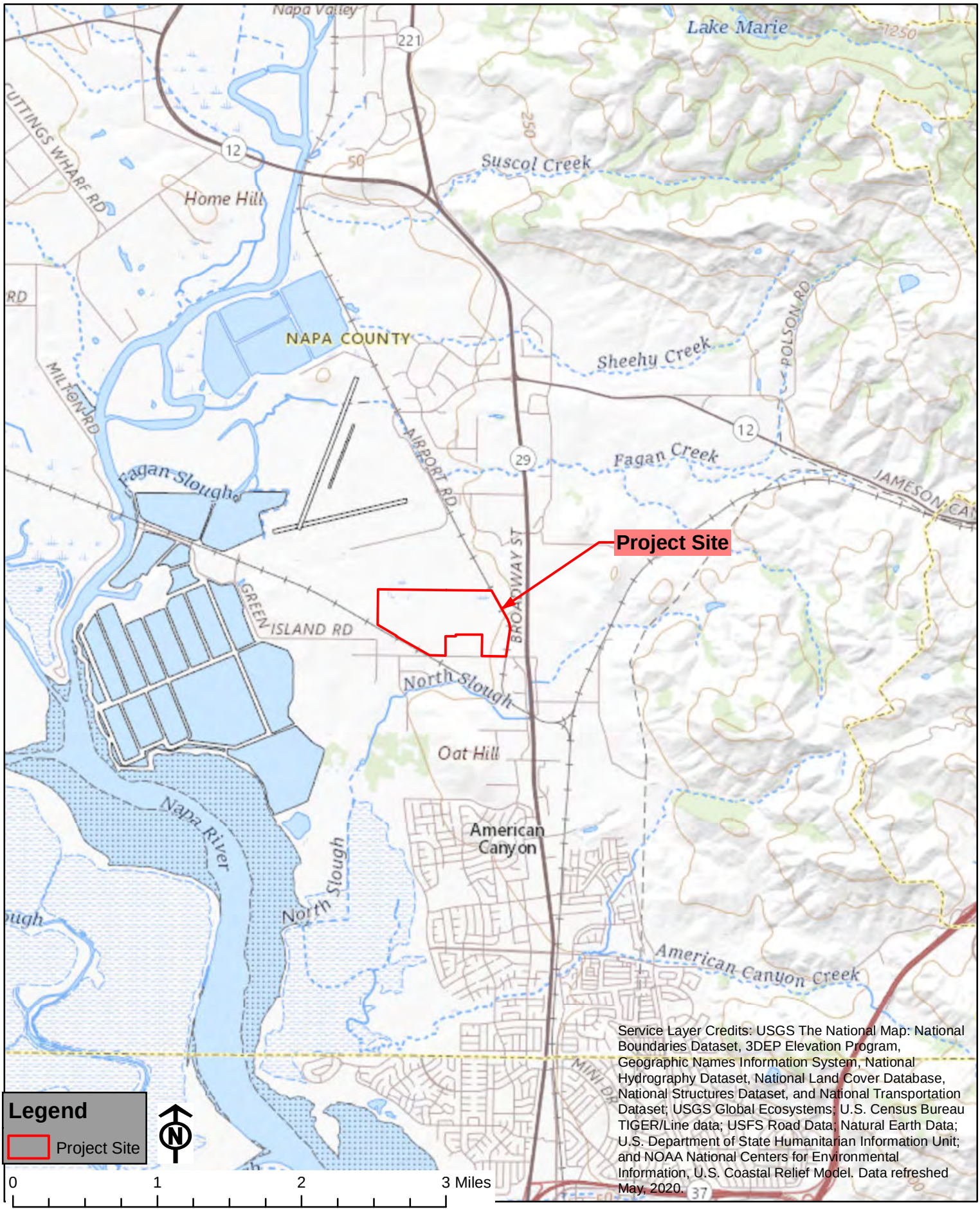


Figure 2. Local Vicinity Map
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

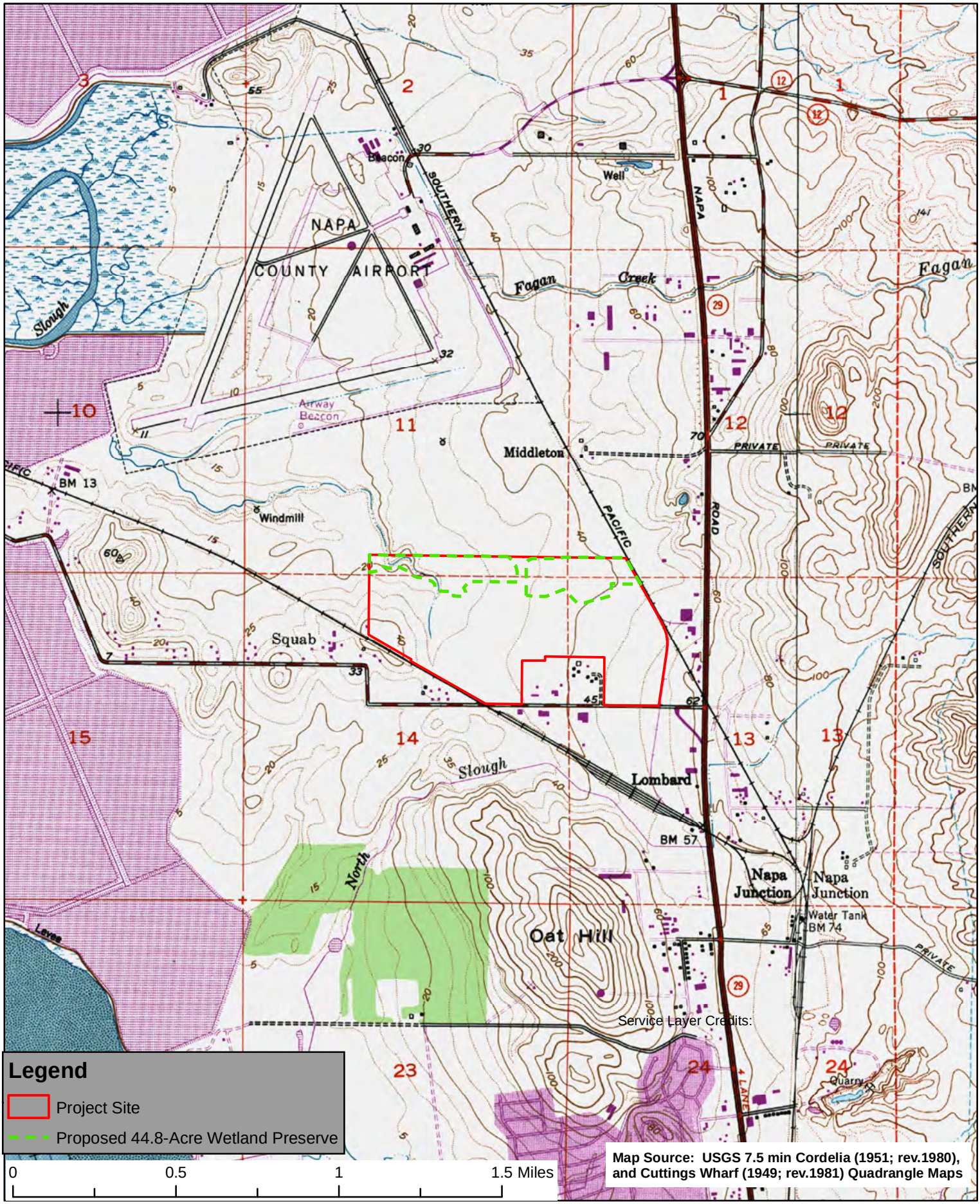
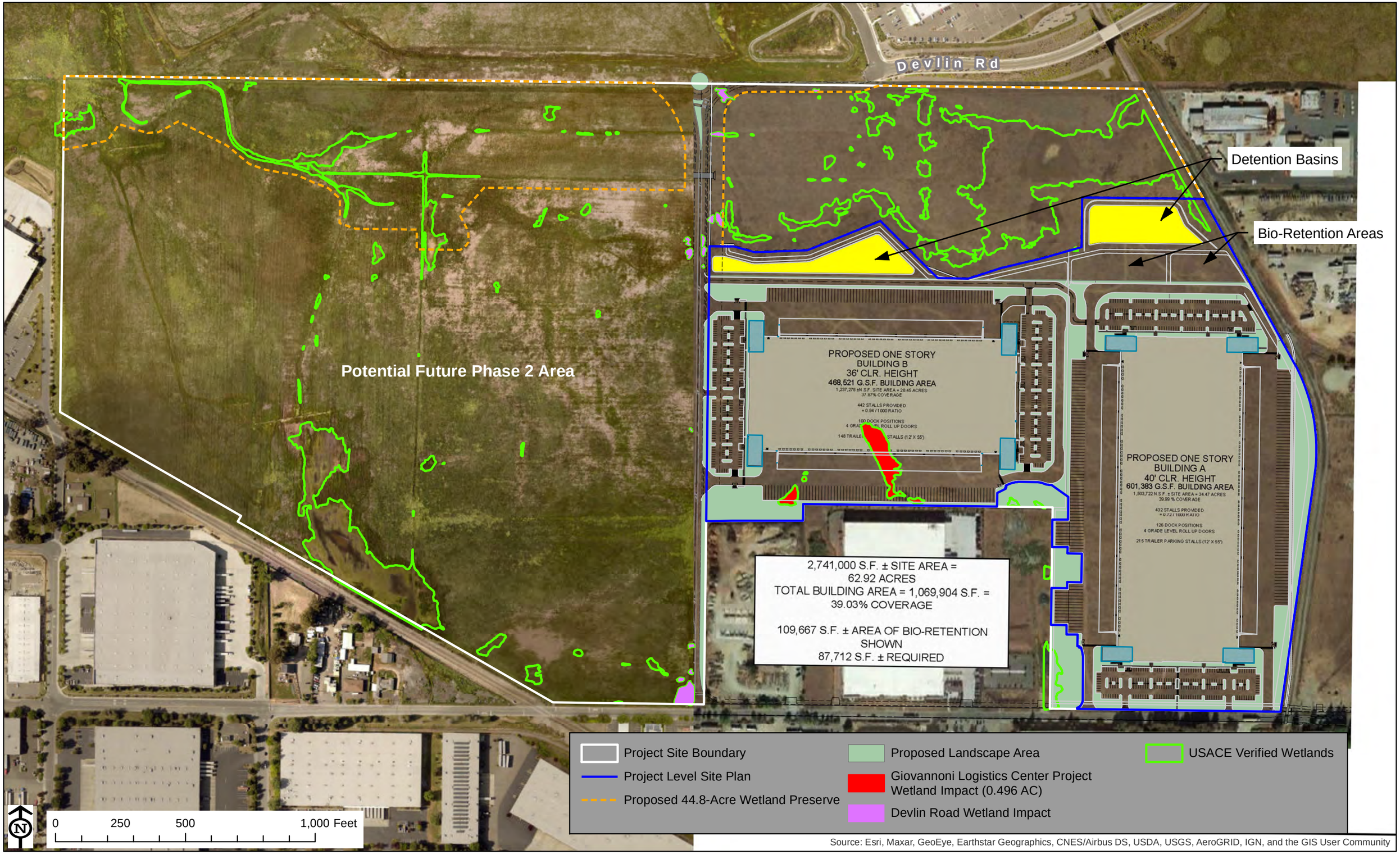


Figure 3. USGS Topographic Map
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

Figure 4. Aerial Imagery With USACE Verified Wetlands
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 5. Project Specific Level Site Plan & Wetland Impacts

Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Imagery Source: County of Napa 6/19/2018

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

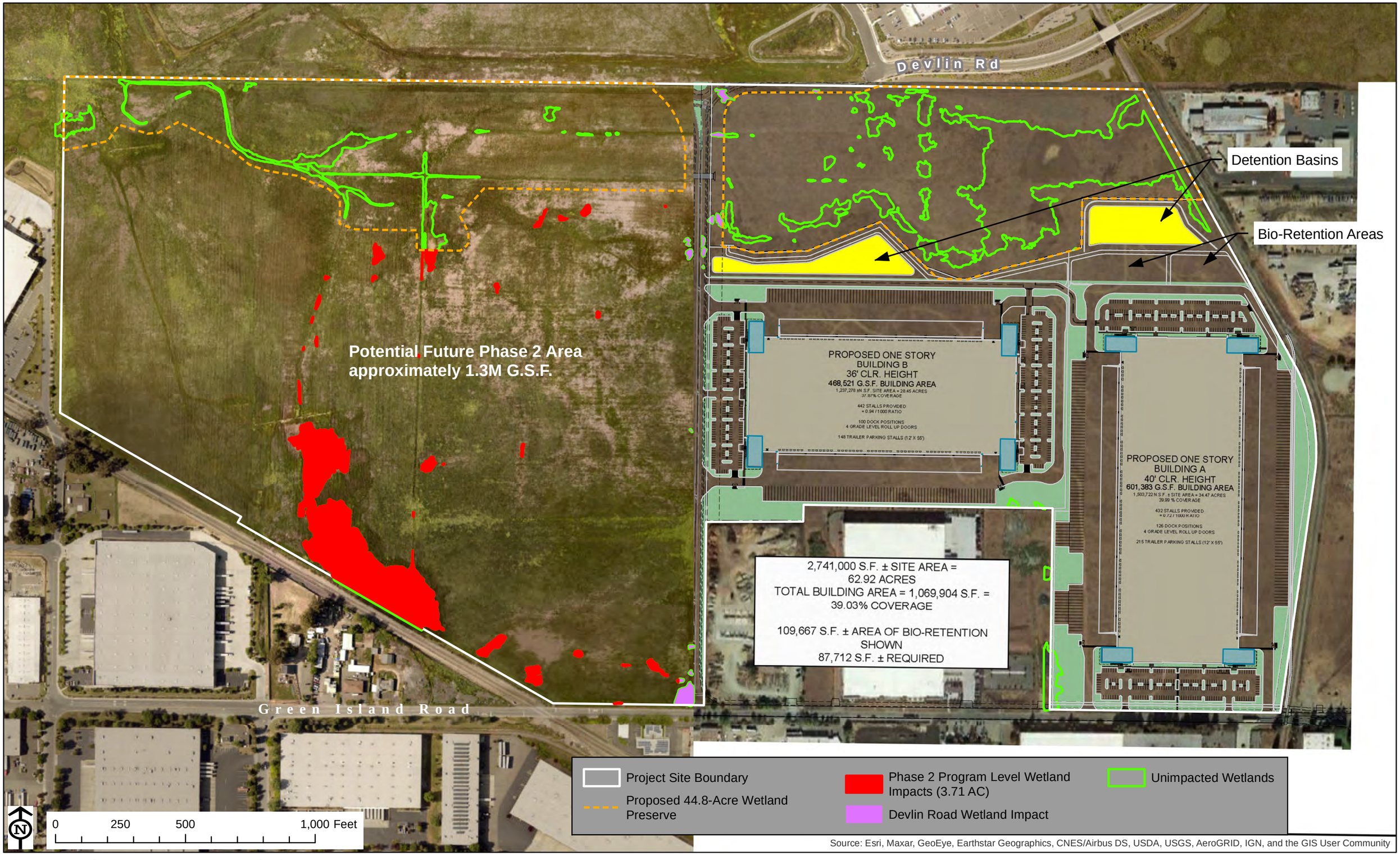


Figure 6. Phase 2 Program Level Site Area & Wetland Impacts

Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Imagery Source: County of Napa 6/19/2018

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

Figure 7. USGS HUC 10 Hydrologic Units
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Huffman-Broadway Group, Inc.
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Devlin Rd

Project Site Boundary

NRCS Soil Type

- Clear Lake clay, drained, 0 to 2 percent slopes, MLRA 14
- Haire clay loam, 2 to 9 percent slopes
- Haire loam, 2 to 9 percent slopes

0 250 500 1,000 Feet

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 8. NRCS Soil Map

Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Imagery Source: County of Napa 6/19/2018

Huffman-Broadway Group, Inc.
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Devlin Rd

Plant trees and shrubs in select locations adjacent to established wetlands on the east and west side and adjacent to No Name Creek.

Passive or active control devise to allow treated stormwater to enter the wetland swale.

Detention Basins

Bio-Retention Areas

Potential Future Phase 2 Area
Approximately 1.3M G.S.F.

PROPOSED ONE STORY
BUILDING B
36' CLR. HEIGHT
468,521 G.S.F. BUILDING AREA
1,237,278 ±N.S.F. SITE AREA = 28.45 ACRES
37.87% COVERAGE

442 STALLS PROVIDED
= 0.94 / 1000 RATIO

100 DOCK POSITIONS
4 GRADE LEVEL ROLL UP DOORS

148 TRAILER PARKING STALLS (12' X 55')

PROPOSED ONE STORY
BUILDING A
40' CLR. HEIGHT
601,383 G.S.F. BUILDING AREA
1,503,722 N.S.F. ± SITE AREA = 34.47 ACRES
39.99 % COVERAGE

432 STALLS PROVIDED
= 0.72 / 1000 RATIO

126 DOCK POSITIONS
4 GRADE LEVEL ROLL UP DOORS

215 TRAILER PARKING STALLS (12' X 55')

2,741,000 S.F. ± SITE AREA =
62.92 ACRES
TOTAL BUILDING AREA = 1,069,904 S.F. =
39.03% COVERAGE

109,667 S.F. ± AREA OF BIO-RETENTION
SHOWN
87,712 S.F. ± REQUIRED

Project Site Boundary
Proposed 44.8-Acre Wetland Preserve
Unimpacted Wetlands
Proposed Mitigation Wetlands (4.7 AC)

N

0 250 500 1,000 Feet

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 9. Wetland Mitigation Site Plan
Giovannoni Logistics Center Project
City of American Canyon, Napa County, California

Imagery Source: County of Napa 6/19/2018

Huffman-Broadway Group, Inc.
ENVIRONMENTAL REGULATORY CONSULTANTS

ATTACHMENT 2.

TABLES

Table 1. Plant Species Observed on the Project Site[2]	
Family/Genius[3]/Species/Subspecies	**Common Name**
DICOTS	
Apiaceae	
Eryngium aristulatum var. aristulatum	California coyote-thistle
*Foeniculum vulgare	Sweet fennel
Perideridia kelloggii	Kellogg's yampah
Asteraceae	
Agoseris grandiflora	giant mountain dandelion
**Anthemis cotula*	Mayweed
Baccharis pilularis subsp. consanguinea	Coyote brush
**Calendula arvensis*	Field-marigold
**Carduus pycnocephalus subsp. pycnocephalus*	Italian thistle
**Centaurea calcitrapa*	Purple starthistle
**Centaurea solstitialis*	Yellow starthistle
**Cichorium intybus*	Chicory
**Cirsium vulgare*	Bull thistle
**Cotula coronopifolia*	Brass-buttons
Deinandra corymbosa	Coast tarweed
**Helminthotheca echioides*	Bristly ox-tongue
Hemizonia congesta subsp. luzulifolia	White hayfield tarweed
**Hypochaeris radicata*	Rough cat's-ear
**Lactuca saligna*	Willow lettuce
**Lactuca serriola*	Prickly lettuce
Lasthenia glaberrima	Smooth goldfields
**Leontodon saxatilis subsp. longirostris*	Long-beaked hawkbit
Microseris douglasii subsp. douglasii	Douglas' silverpuffs
**Pseudognaphalium luteoalbum*	Everlasting cudweed
Psilocarphus brevissimus var. brevissimus	Dwarf woolly-heads
**Senecio vulgaris*	Common groundsel
**Sonchus asper subsp. asper*	Prickly sow-thistle
**Sonchus oleraceus*	Common sow-thistle
**Taraxacum officinale*	Common dandelion
**Tragopogon porrifolius*	Common salsify
Boraginaceae	
Plagiobothrys stipitatus var. micranthus	Great Valley popcornflower
Plagiobothrys undulatus	Wavy-stemmed popcornflower
Brassicaceae	
**Brassica nigra*	Black mustard

[2] List includes Angiosperms only.

[3] * Denotes California native species.

Table 1. Plant Species Observed on the Project Site[2]	
Family/Genius[3]/Species/Subspecies	**Common Name**
**Brassica rapa*	Field mustard
Cardamine californica	Milk maids
**Lepidium latifolium*	Broadleaf pepperweed
**Nasturtium officinale*	Water cress
**Raphanus raphanistrum*	Jointed charlock
**Raphanus sativus*	Wild radish
**Sisymbrium altissimum*	Tumble mustard
Campanulaceae	
Downingia concolor var. concolor	Downingia
Caryophyllaceae	
Cerastium arvense subsp. strictum	Meadow chickweed
**Silene gallica*	Windmill-pink
Convolvulaceae	
**Convolvulus arvensis*	Bindweed
Cuscuta sp.	Dodder
Crassulaceae	
Crassula aquatica	Water pygmy-weed
Fabaceae	
**Lotus corniculatus*	Birdfoot trefoil
Lupinus bicolor	Bicolored lupine
**Medicago polymorpha*	California burclover
Trifolium ciliolatum	Foothill clover
**Trifolium dubium*	Little hop clover
**Trifolium fragiferum*	Strawberry clover
**Trifolium hirtum*	Rose clover
**Trifolium incarnatum*	Crimson clover
**Trifolium repens*	White clover
**Trifolium subterraneum*	Subterranean clover
Trifolium variegatum	White-tip clover
**Vicia benghalensis*	Purple vetch
**Vicia sativa*	Common vetch
Gentianaceae	
Zeltnera muehlenbergii	June centaury
Geraniaceae	
**Erodium botrys*	Broad-leaf filaree
**Erodium cicutarium*	Red-stem filaree
**Erodium moschatum*	White-stem filaree
**Geranium dissectum*	Cut-leaf geranium
Gentianaceae	
Zeltnera muehlenbergii	June centaury

Table 1. Plant Species Observed on the Project Site[2]	
Family/Genius[3]/Species/Subspecies	**Common Name**
Lamiaceae	
**Mentha pulegium*	Pennyroyal
Stachys albens	White-stem hedge-nettle
Linaceae	
**Linum bienne*	Flax
Lythraceae	
**Lythrum hyssopifolia*	Hyssop loosestrife
Malvaceae	
**Malva parviflora*	Cheeseweed
Montiaceae	
Claytonia perfoliata	Miner's lettuce
Myrsinaceae	
**Lysimachia arvensis*	Scarlet pimpernel
Onagraceae	
Epilobium brachycarpum	Summer cottonweed
Epilobium ciliatum	Hairy willow-herb
Taraxia ovata	Sun cup
Orobanchaceae	
**Bellardia trixago*	Mediterranean linseed
Castilleja attenuate	Valley tassels
Castilleja exserta subsp. exserta	Purple owl's-clover
**Parentucellia viscosa*	Yellow glandweed
Triphysaria versicolor subsp. faucibarbata	Yellow owl's-clover
Plantaginaceae	
Callitriche marginate	Winged water starwort
**Plantago lanceolata*	English plantain
**Veronica anagallis-aquatica*	Water speedwell
Veronica peregrina subsp. Xalapensis	Purslane speedwell
Polygonaceae	
**Polygonum aviculare*	Common knotweed
**Rumex acetosella*	Sheep sorrel
**Rumex crispus*	Curly dock
**Rumex pulcher*	Fiddle dock
Ranunculaceae	
**Ranunculus muricatus*	Spiny-fruit buttercup
Ranunculus pusillus	Low buttercup
Rosaceae	
**Rubus armeniacus*	Himalayan blackberry
Rubiaceae	
Galium aparine	Goose grass

Table 1. Plant Species Observed on the Project Site[2]	
Family/Genius[3]/Species/Subspecies	**Common Name**
Verbenaceae	
Phyla nodiflora	Common frog fruit
MONOCOTS	
Alismataceae	
**Alisma lanceolatum*	Lance-leaf water-plantain
Cyperaceae	
Cyperus eragrostis	Tall flatsedge
Eleocharis macrostachya	Creeping spikerush
Schoenoplectus acutus var. occidentalis	Common tule
Iridaceae	
Sisyrinchium bellum	Western blue-eyed grass
Juncaceae	
Juncus balticus subsp. Ater	Baltic rush
Juncus bufonius var. bufonius	Toad rush
Juncus mexicanus	Mexican rush
Juncus phaeocephalus	Brown-headed rush
Juncus xiphioides	Iris-leaved rush
Juncaginaceae	
Triglochin scilloides	Flowering quillwort
Poaceae	
**Aegilops triuncialis*	Barbed goatgrass
**Avena barbata*	Slender wild oat
**Briza minor*	Small quaking grass
**Bromus diandrus*	Ripgut grass
**Bromus hordeaceus*	Soft chess
**Elymus caput-medusae*	Medusahead
Elymus multisetus	Big squirreltail
Elymus triticoides	Creeping wildrye
**Festuca bromoides*	Brome fescue
**Festuca perennis*	perennial ryegrass
**Holcus lanatus*	Common velvet grass
Hordeum brachyantherum	Meadow barley
**Hordeum marinum subsp. Gussoneanum*	Mediterranean barley
**Hordeum murinum subsp. leporinum*	Hare barley
**Phalaris aquatica*	Harding grass
**Phalaris paradoxa*	Paradox canary-grass
Pleuropogon californicus var. californicus	Annual semaphore grass
**Poa annua*	Annual bluegrass
**Polypogon interruptus*	Ditch beard grass
**Polypogon monspeliensis*	Annual beard grass

Table 1. Plant Species Observed on the Project Site[2]	
Family/Genius[3]/Species/Subspecies	**Common Name**
Themidaceae	
Brodiaea elegans subsp. elegans	Harvest brodiaea
Dichelostemma capitatum subsp. capitatum	Blue dicks
Triteleia laxa	Ithuriel's spear
Typhaceae	
Typha latifolia	Broad-leaved cattail

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
ANIMALS			
Invertebrates			
Valley Elderberry longhorn beetle (*Desmocerus californicus dimorphus*)	FT/--	Inhabits blue elderberry bushes (host plant); restricted to the Central Valley and adjacent foothills.	Not present. Suitable habitat is not present at the project site. No elderberry plants were observed during the field review.
Callippe silverspot butterfly (*Speyeria callippe callippe*)	FE/--	Habitat for this species is grassland, often with a significant component of native grasses including the host plant (*Viola pedunculata*) and characterized by shallow rocky soils and numerous rock outcrops.	Not present. Suitable habitat is not present at the site.
Monarch butterfly (*Danaus plexippus*) (wintering sites)	--/--	Winter roost sites located in wind-protected tree groves (eucalyptus, Monterey pine, cypress) with nectar and water sources nearby. Larval host plant is milkweed, primarily of the genus *Asclepias*.	Not present. Suitable habitat for an overwintering site is not present at the site. No milkweed plants of the genus *Asclepias* were found on the property.
California freshwater shrimp *(Syncaris pacifica)*	FE/CE	Found in low elevation, low gradient streams where riparian cover is moderate to heavy. Prefers shallow pools removed from the main flow. In winter, prefers undercut banks with exposed roots; in	Not present. Suitable habitat is not present at the site.

[4] Source: California Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Wildlife for the Cuttings Wharf 7.5 Minute Quadrangle Map and surrounding areas, February 2021.

[5] Definitions of status codes can be found in Table 4.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
		summer low flows, clings to submerged portions of overhanging tree shrub branches.	
Vernal pool fairy shrimp (*Branchinecta lynchi*)	FT/--	Inhabits vernal pools; occurs throughout the Delta and Central Valley.	Not present. Protocol surveys were negative for this species.
Western ridged mussel (*Gonidea angulata*)	--/--	Primarily creeks and rivers and less often lakes. Originally found in most of California, but now extirpated from Central and Southern California. Specimens known from Napa River area.	Not present. Suitable habitat is not present at the site.
Fish			
Steelhead – Central CA Coast ESU (*Oncorhynchus mykiss*)	FT/CSC	Well-oxygenated streams with riffles; loose, silt-free gravel substrate.	Not present. Suitable habitat is not present at the site.
Longfin smelt *(Spirinchus thaleichthys)*	FC/CE,CSC	Found in open waters of estuaries, mostly in the middle or bottom of the water column. Euryhaline, nektonic and anadromous. Prefers salinities of 15030 ppt but can be found in both freshwater and seawater.	Not present. Suitable habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Delta smelt (*Hypomesus transpacificus*)	FT/CT	During spawning they migrate upstream into shallow fresh or slightly brackish tidally-influenced backwater sloughs and channel edges. In Solano County, Delta Smelt are found in Suisun Bay/Suisun Marsh sloughs upstream through the delta in Contra Costa, Sacramento, San Joaquin, Solano and Yolo counties.	Not present. Suitable habitat is not present at the site.
Sacramento splittail (*Pogonichthys macrolepidotus*)	--/CSC	Adult Sacramento Splittail migrate upstream from brackish areas to spawn in freshwater areas subject to flooding, such as the lower reaches of rivers, dead end sloughs, and in larger sloughs such as Montezuma Slough.	Not present. Suitable habitat is not present at the site.
Amphibians			
Foothill yellow-legged Frog (*Rana boylii*)	--/CSC	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying; larvae need at least 15 weeks to attain metamorphosis.	Not present. Suitable habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
California red-legged frog *(Rana draytonii*)	FT/CSC	Mostly found in lowlands and foothills in/near permanent sources of deep water but will disperse far during and after rain. Prefers shorelines with extensive vegetation. Requires 11-20 weeks of permanent water for larval development and requires access to aestivation habitat.	Not present. Suitable habitat is not present at the site as verified by a protocol Phase 1 Habitat Assessment.
Reptiles			
Western pond turtle (*Emys marmorata*)	--/CSC	Aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Needs basking sites and suitable upland habitat for egg-laying (sandy banks or grassy open fields).	Not present. Suitable habitat is not present at the site.
Birds			
Great blue heron (*Ardea herodias*) (Rookery)	--/--	Colonial nester in tall trees, cliff sides, and sequestered spots on marshes. Rookery sites in close proximity to foraging areas: marshes, lake margins, tide-flats, rivers and streams, wet meadows.	Not present. Suitable habitat for a rookery is not present at the site.
Black-crowned night-heron *(Nycticorax nycticorax)* [Nesting]	--/--	Colonial nester, usually in trees but occasionally in tule patches. Rookery sites are located adjacent to foraging areas including lake margins, mud-bordered bays and marshy spots.	Not present. Suitable habitat for nesting is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Golden eagle (*Aquila chrysaetos*) [nesting and wintering]	BCC/FP, WL	Typically frequents rolling foothills, mountain areas, sage-juniper flats and desert.	Not present as a nesting species. Suitable nesting habitat is not present at the site. Seen foraging on the property in spring 2021. Preconstruction nesting surveys are required to ensure no indirect impacts to eagles that could nest nearby.
Northern harrier (*Circus cyaneus*) [Nesting]	--/CSC	Coastal salt marsh and freshwater marsh; nests and forages in grasslands; nests on ground in shrubby vegetation, usually at marsh edge.	Possible. Suitable nesting habitat may be present at the site. Observed on site during winter as well as nesting season. Preconstruction nesting surveys are required to ensure no impact to nesting birds.
White-tailed kite (*Elanus caeruleus*) [nesting]	--/CFP	Open grassland and agricultural areas throughout Central California.	Not present. Suitable nesting habitat is not present on site. Species observed foraging on the site during winter.
Cooper's hawk (*Accipiter cooperii*) [nesting]	-/WL	Nests primarily in deciduous riparian forests; forages in open woodlands.	Not present. Suitable nesting habitat is not present on site. Species likely forages on or near the site, especially in winter.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Sharp-shinned hawk (*Accipiter striatus*) [nesting]	--/WL	Breeds in ponderosa pine, black oak, riparian deciduous, mixed conifer, and Jeffrey pine habitats. Prefers, but not restricted to, riparian habitats. All habitats except alpine, open prairie, and bare desert used in winter.	Not present. Suitable nesting habitat is not present on site. Species likely forages on or near the site, especially in winter.
Swainson's hawk (nesting) *(Buteo swainsoni)*	BCC/CT	Nests in trees and riparian stands; summer migrant to Central Valley. Suitable foraging areas include grasslands, pastures, alfalfa and other hay crops, and certain grain and row croplands.	Not present as a nesting species. Suitable nesting habitat is not present at the site. Seen foraging on the property in spring 2021. Preconstruction nesting surveys are required to ensure no indirect impacts to Swainson's hawks that could nest nearby.
Ferruginous hawk *(Buteo reglais)* (wintering)	--/WL	Inhabits open country. Winters in small numbers along California coast and inland valleys.	Wintering possible. The site is considered suitable winter foraging habitat, however, the species has not been observed using the site.
Osprey (*Pandion haliaetus*) [Nesting]	--/WL	Breeds in northern California from the Cascade Ranges south to Lake Tahoe, and along the coast south to Marin County. Associated strictly with large, fish-bearing waters, primarily in Ponderosa pine through mixed conifer habitats. Nests on Inverness Ridge.	Not present. Suitable nesting habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
American Peregrine falcon (*Falco peregrinus anatum*)	BCC/FP	Nests in woodland, forest, and coastal habitats, on cliffs or banks, and usually near wetlands, lakes, rivers, sometimes on human-made structure. In non-breeding seasons found in riparian areas and coastal and inland wetlands.	Not present. Occurs in the area but suitable nesting habitat is not present at the site.
Merlin (*Falco columbarius*) [wintering]	-/WL	Breeds in Canada, winters in a variety of California habitats, including grasslands, savannahs, wetlands, etc.	Not present. May occasionally forage at the site during the winter.
Ridgway's (California clapper) rail (*Rallus obsoletus*)	FE/CE,FP	Found in saltwater marshes traversed by tidal sloughs in the vicinity of San Francisco Bay; associated with abundant growths of pickleweed; feeds on mollusks obtained from mud-bottomed sloughs.	Not present. Suitable habitat is not present at the site.
California black rail *(Laterallus jamaicensis coturniculus*)	--/CT,FP	Mainly inhabits salt-marshes bordering larger bays. Occurs in tidal salt marsh with dense growths of pickleweed; also occurs in freshwater and brackish marshes.	Not present. Suitable habitat is not present at the site.
Yellow rail (*Coturnicops noveboracensis*)	BCC/CSC	Found in freshwater marshes. Summer resident in the eastern Sierra and Modoc County.	Not present. Suitable habitat is not present at the site.
Western snowy plover (*Charadrius alexandrinus nivosus*) [nesting]	FT,BCC/CSC	Found on sandy beaches or marine and estuarine shores; also salt pond levees and shores of large alkali lakes; requires sandy, gravelly or friable soil substrate for nesting.	Not present. Suitable habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Caspian tern *(Hydroprogne caspia)*	BCC/--	Nests on sandy or gravely beaches and shell banks in small colonies inland and along the Coast. Found in inland freshwater lakes and marshes, and also brackish or salt waters of estuaries and bays.	Not present. Suitable habitat is not present at the site.
Burrowing owl (*Athene cunicularia*)	BCC/CSC	Found in open dry annual or perennial grasslands, deserts and scrublands characterized by low growing vegetation. This species is a subterranean nester, dependent upon burrowing mammals, most notably the California ground squirrel.	Not present. Suitable habitat is not currently present at the site due to general lack of ground squirrels and ground squirrel colonies. Could possibly inhabit the site in the future. Preconstruction nesting surveys are required to ensure no impact to nesting birds.
Short-eared owl (*Asio flammeus)* (nesting)	--/CSC	Found in marshes, both freshwater and salt; lowland meadows; irrigated alfalfa fields. Tule patches/full grass needed for nesting and daytime seclusion. Nests on dry ground in a depression concealed in vegetation.	Not present. Suitable habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Bank swallow *(Riparia riparia)* (nesting)	--/CT	A migrant found primarily in riparian and other lowland habitats in California west of the deserts. A spring and fall migrant in the interior, less common on coast; an uncommon and very local summer resident. In summer, restricted to riparian areas with vertical cliffs and banks with fine-textured or sandy soil, into which it digs its nesting holes.	Not present. Suitable habitat is not present at the site.
Loggerhead shrike (*Lanius ludovicianus*)	BCC/CSC	Habitat includes open areas such as desert, grasslands and savannah. Nests in thickly foliaged trees or tall shrubs. Forages in open habitats, which contain trees, fence posts, utility poles, and other perches.	Not present. Suitable habitat is not present at the site.
San Francisco common yellowthroat (*Geothlypis trichas sinuosa*)	BCC/CSC	Requires thick continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	Not present. Suitable habitat is not present at the site.
Yellow warbler *(Dendroica petechia*) [nesting]	BCC/CSC	Breeds in deciduous riparian woodlands, widespread during fall migration.	Not present. Suitable habitat is not present at the site.
San Pablo song sparrow *(Melospiza melodia samuelis)*	BCC/CSC	Tidal, brackish or salt marshes, San Pablo Bay.	Not present. Suitable habitat is not present at the site.
Suisun song sparrow *(Melospiza melodia maxillaris)*	BCC/CSC	Forages and nests in dense marsh and scrub habitat along the margins of Suisun Bay.	Not present. Suitable habitat is not present at the site.

TABLE 2. SPECIAL STATUS ANIMAL SPECIES THAT HAVE BEEN REPORTED IN THE VICINITY OF THE PROJECT SITE, CITY OF AMERICAN CANYON, CALIFORNIA[4]			
SPECIES	**STATUS CODES[5] FED/STATE**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Tri-colored blackbird (*Agelaius tricolor*) [Nesting colony]	BCC/CE,CSC	Breeds near freshwater, usually in tall emergent vegetation. Requires open water with protected nesting substrate. Colonies prefer heavy growth of cattails and tules. Uses grasslands and agricultural lands for foraging.	Not present. Suitable habitat is not present at the site.
Mammals			
Salt Marsh harvest mouse (*Reithrodontomys raviventris*)	FE/CE,FP	Inhabits saline emergent wetlands in the San Francisco Bay and its tributaries. Pickleweed is the primary habitat.	Not present. Suitable habitat is not present at the site.
Suisun shrew *(Sorex ornatus sinuosus)*	--/CSC	Inhabits tidal marshes along the northern shores of San Pablo and Suisun Bays.	Not present. Suitable habitat is not present at the site.
American badger (*Taxidea taxus*)	--/CSC	Drier open stages of most shrub, forest, and herbaceous habitats; needs sufficient food, friable soils and open, uncultivated ground.	Not present. Suitable habitat is not present at the site.
Pallid bat *Antrozous pallidus*	--/CSC	Roosts primarily in oak woodland and ponderosa pine habitats; forages in open areas.	Not present. Suitable habitat is not present at the site.

TABLE 3. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR IN THE VICINITY OF THE PROJECT SITE, AMERICAN CANYON, CALIFORNIA[6]			
SPECIES	**STATUS CODES[7] FED/STATE/CNPS**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Henderson's bent grass *(Agrostis hendersonii)*	--/--/3.2	Found in moist places in valley and foothill grassland or vernal pools. 65-1030m.	Not present. Suitable habitat is not present at the site.
Franciscan onion (*Allium peninsulare franciscanum*)	--/--/1B.2	Found in cismontane woodland and valley and foothill grassland in clay soils and serpentine on dry hillsides. 100-300m.	Not present. Suitable habitat is not present at the site.
Napa false indigo (*Amorpha californica* var. *napensis*)	--/--/1B.2	Broadleafed upland forest, chaparral, cismontane woodland. Openings in forest or woodland or in chaparral. 150-2000m.	Not present. Suitable habitat is not present at the site.
Alkali Milk-vetch (*Astragalus tener* var. *tener*)	--/--/1B.2	Inhabits low ground, alkali flats and flooded land in valley and foothill grasslands or in playas or vernal pools. 1-170m.	Not present. Suitable habitat is not present at the site.
Big-scale (California) balsamroot (*Balsamorhiza macrolepis var. macrolepis*)	--/--/1B.2	Chaparral, cismontane woodland, valley and foothill grassland, sometimes on serpentinite. 90-1555m.	Not present. Suitable habitat is not present at the site.
Big tarplant (*Blepharizonia plumosa*)	--/--/1B.1	Valley and foothill grasslands. Found in dry hill and plains in annual grassland in clay and clay-loam soils, usually on slopes. Often in burned areas. 60-505m.	Not present. Suitable habitat is not present at the site.
Narrow-anthered brodiaea (*Brodiaea leptandra*)	--/--/1B.2	Broadleafed upland forest, chaparral, lower montane coniferous forest. 110-915m. Nearest location is near Mt. George about 4 miles northeast of the site.	Not present. Suitable habitat is not present at the site.

[6] Source: California Natural Diversity Data Base, Natural Heritage Division, California Department of Fish and Wildlife for the Cuttings Wharf 7.5 Minute Quadrangle Map and surrounding areas, February 2021.

[7] Definitions of status codes can be found in Table 4.

TABLE 3. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR IN THE VICINITY OF THE PROJECT SITE, AMERICAN CANYON, CALIFORNIA[6]			
SPECIES	**STATUS CODES[7] FED/STATE/CNPS**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Lyngbye's sedge (*Carex lyngbyei*)	-/-/2B.2	Marshes and swamps (brackish or freshwater) at sea level.	Not present. Suitable habitat is not present at the site.
Tiburon paintbrush (*Castilleja affinis* ssp. *neglecta*)	FE/ST/1B.2	Rocky serpentine sites within valley and foothill grassland. 75-400m.	Not present. Suitable habitat is not present at the site.
Rincon Ridge ceanothus (*Ceanothus confuses)*	--/--/1B.1	Known from volcanic or serpentine soils on dry shrubby slopes in closed-cone coniferous forest, chaparral, and cismontane woodland. 75-1065m.	Not present. Suitable habitat is not present at the site.
Holly-leaved ceanothus (*Ceanothus purpureus)*	--/--/1B.2	Rocky volcanic slopes in chaparral. 120-640m.	Not present. Suitable habitat is not present at the site.
Congdon's tarplant (*Centromedia parryi congdonii*)	--/--/1B.2	Alkaline soils in valley and foothills grassland.	Not present. Suitable habitat is not present at the site.
Pappose tarplant (*Centromadia parryi ssp. parryi*)	--/--/1B.2	Found in mesic and often alkaline site in coastal prairie, meadows and seeps, coastal salt marsh and valley and foothill grasslands. 2-420m	Not present. Suitable habitat is not present at the site.
Soft salty bird's beak *Chloropyron molle ssp. molle*	FT/--/1B.1	Found in Coastal salt marsh with *Distichlis*, *Salicornia, Frankenia*, etc. 0-5 m.	Not present. Suitable habitat is not present at the site.
Bolander's water-hemlock (*Cicuta maculata* var. *bolanderi*)	--/--/2B.1	Fresh or brackish water marshes. 0-200m.	Not present. Suitable habitat is not present at the site.
Dwarf Downingia (*Downingia pusilla*)	--/--/2B.2	Inhabits vernal pools and vernal lake margins. 1-445m.	Not present. Suitable habitat is not present at the site.
Greene's narrow-leaved daisy (*Erigeron greenei*)	--/--/1B.2	Serpentine and volcanic substrates in chaparral. 75-1060m.	Not present. Suitable habitat is not present at the site.
Jepson's coyote-thistle *(Eryngium jepsonii)*	--/--/1B.2	On clay soils in vernal pools and valley and foothill grassland. 3-305 m.	Not present. Suitable habitat is not present at the site.

TABLE 3. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR IN THE VICINITY OF THE PROJECT SITE, AMERICAN CANYON, CALIFORNIA[6]			
SPECIES	**STATUS CODES[7] FED/STATE/CNPS**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
San Joaquin spearscale (*Etriplex joaquiniana*)	--/--/1B.2	Chenopod scrub, meadows, playas, valley and foothill grassland and vernal pools. Usually in seasonal alkali wetlands or alkali sink scrub with *Distichlis*, *Frankenia*, etc. 1-835m.	Not present. Suitable habitat is not present at the site.
Fragrant fritillary (*Fritillaria liliacea*)	--/--/1B.2	Coastal scrub, valley and foothill grassland, coastal prairie. Often on serpentine; various soils reported though usually clay, in grassland. 3-410m.	Not present. Suitable habitat is not present at the site.
Diablo helianthela *(Helianthela castenea)*	--/--/1B.2	Broadleaved upland forest, chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Usually in chaparral/oak woodland interface in rocky, azonal soils. Often in partial shade. 25-1150m.	Not present. Suitable habitat is not present at the site.
Brewer's western flax (*Hesperolinon breweri*)	--/--/1B.2	Chaparral, cismontane woodland and valley and foothill grassland; often found in rocky serpentine soil in serpentine chaparral and serpentine grassland. 30-885 m.	Not present. Suitable habitat is not present at the site.
Carquinez goldenbush *(Isocoma argute)*	--/--/1B.1	Found in Valley and Foothill grassland. On alkaline soils, flats and lower hill. Found on low benches near drainages and on tops and sides of mounds in swale habitat. 1-50 m.	Not present. Suitable habitat is not present at the site.

TABLE 3. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR IN THE VICINITY OF THE PROJECT SITE, AMERICAN CANYON, CALIFORNIA[6]			
SPECIES	**STATUS CODES[7] FED/STATE/CNPS**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Contra Costa goldfields (*Lasthenia conjugens*)	FE/--/1B.1	Vernal pools, swales, low depressions, in open grassy areas. 1-445m. Extirpated from most of its range. Most remaining occurrences restricted to the Fairfield region.	Not present. Suitable habitat is not present at the site.
Delta tule pea (*Lathyrus jepsonii* var. *jepsonii*)	--/--/1B.2	Inhabits the banks of sloughs and bays in the Suisun Bay and Delta. Found in freshwater and brackish marshes.	Not present. Suitable habitat is not present at the site.
Legenere (*Legenere limosa*)	--/--/1B.1	Inhabits the beds of vernal pools. 1-880m.	Not present. Suitable habitat is not present at the site.
Jepson's leptosiphon (*Leptosiphon jepsonii*)	--/--/1B.2	Found on volcanics or the periphery of serpentine substrates in chaparral, cismontane woodland, and open to partially shaded grassy slopes. 55-855 m.	Not present. Suitable habitat is not present at the site.
Mason's lilaeopsis (*Lilaeopsis masonii*)	--/Rare/1B.1	Freshwater and brackish marshes, riparian scrub. Tidal zones, in muddy or silty soil formed through river deposition or river bank erosion. 0-10m.	Not present. Suitable habitat is not present at the site.
Marin knotweed (*Polygonum marinense*)	--/--/3.1	Coastal salt marshes and brackish marshes. 0-10m.	Not present. Suitable habitat is not present at the site.
California beaked-rush (*Rhynchospora californica*)	--/--/1B.1	Freshwater seeps and open marshy areas in bogs, fens, marshes and swamps and lower montane coniferous forest. 45-1000m.	Not present. Suitable habitat is not present at the site.
Chaparral ragwort *(Senecio aphanactis)*	--/--/1B.2	Known from foothill woodland and chaparral habitats.	Not present. Suitable habitat is not present at the site.
Napa checkerbloom *(Sidalcea hickmanii* ssp. *napensis)*	--/--/1B.1	Occurs on rhyolite substrates in chaparral. 415-610m.	Not present. Suitable habitat is not present at the site.

TABLE 3. SPECIAL STATUS PLANTS WITH POTENTIAL TO OCCUR IN THE VICINITY OF THE PROJECT SITE, AMERICAN CANYON, CALIFORNIA[6]			
SPECIES	**STATUS CODES[7] FED/STATE/CNPS**	**HABITAT**	**OCCURRENCE ON THE PROJECT SITE**
Suisun Marsh aster (*Symphyotrichum lentum*)	--/--/1B.2	Both brackish and freshwater marshes and swamps. 0-3m.	Not present. Suitable habitat is not present at the site.
Napa bluecurls (*Trichostema ruygtii*)	--/--/1B.2	Open sunny areas in cismontane woodland, chaparral, valley and foothill grassland, vernal pools and lower montane coniferous forest. 30-590 m.	Not present. Suitable habitat is not present at the site.
Two-fork clover (*Trifolium amoenum*)	FE/--/1B.1	Valley and foothill grassland, coastal bluff scrub, sometimes on serpentine soil. 5-560m.	Not present. Suitable habitat is not present at the site.
Saline clover (*Trifolium depauperatum* var. *hydrophilum*)	--/--/1B.2	Marshes and swamps, mesic alkaline sites, vernal pools in valley and foothill grassland. 0-300m.	Not present. Suitable habitat is not present at the site.
Oval-leaved viburnum (*Viburnum ellipticum*)	--/--/2B.3	Chaparral, cismontane woodland and lower montane coniferous forest. 215-1400m.	Not present. Suitable habitat is not present at the site.

Table 4. Status Code Definitions for Table 2 & 3	
Federal Codes	**State Codes**
FE - Federally listed Endangered FT – Federally listed Threatened FPE - Federally Proposed Endangered FPT - Federally Proposed Threatened BCC - USFWS Bird Species of Conservation Concern	CE - California State-listed Endangered CT - California State-listed Threatened CR - California Rare FP - California Fully Protected CSC - CDFW Species of Special Concern WL - CDFW Watch List Species
CNPS Rare Plant Rank Codes	
California Rare Plant Rank 1A	Plants presumed extirpated in California and either rare or extinct elsewhere
California Rare Plant Rank 1B	Plants rare, threatened, or endangered in California and elsewhere.
California Rare Plant Rank 2A	Plants presumed extirpated in California, but more common elsewhere.
California Rare Plant Rank 2B	Plants rare, threatened, or endangered in California, but more numerous elsewhere.
California Rare Plant Rank 3	Plants about which more information is needed – a review list.
California Rare Plant Rank 4	Plants of limited distribution – a watch list.
CNPS Threat Rank Codes	
0.1	Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3	Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

ATTACHMENT 3.

Habitat Assessment for the California Red-legged Frog at the Proposed Giovannoni Logistics Project Site, American Canyon, California. Prepared by Mark Jennings of Rana Resources for Huffman-Broadway Group, Inc. March 11, 2021

HABITAT ASSESSMENT
FOR THE CALIFORNIA RED-LEGGED FROG,
AT THE PROPOSED GIOVANNONI LOGISTICS PROJECT SITE,
AMERICAN CANYON, NAPA COUNTY, CALIFORNIA

March 11, 2021

Prepared for:

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TABLE OF CONTENTS

FIGURES

SUMMARY

This report is a Habitat Assessment for the federally threatened California red-legged frog (*Rana draytonii*, hereafter CRLF) at the location of the approximately 210-acre infill development [=Giovannoni Logistics Project] between Devlin Road to the north and Green Island Road to the south in the northwestern part of the City of American Canyon, Napa County (Project). The Project is now nearly entirely surrounded by industrial businesses and warehouse buildings, along with other structures, as well as Southern Pacific Railroad tracks to the south and east, and Highway 29 to the east. The Napa River estuary lies further to the west.

The Project site consists of an open field with a mosaic non-native annual grasses and seasonal wetlands. It is subject to sheet flooding which eventually drains northwest into an unnamed channel which continues off-site under Devlin Road. There are no connections with other stream courses which drain the agricultural fields and hills east of Highway 29. The area is relatively flat with an elevational range of approximately 20-50 feet.

The closest known CRLF records to the site are 0.6-2.4 miles to the east and southeast; additional CRLF records 3.7 miles and further away lie within Critical Habitat designated for this species (SOL-2 and SOL-3). All of these records lie east of Highway 29 which is a major barrier to any potential movements of CRLF to the west due to continuous traffic, highway berms, and the re-routing of drainages into culverts under the freeway. Additionally, the Project is completely isolated from all areas to the east by Highway 29, railroads, buildings, and other urban infrastructure, and there are no hydrologic connections with any stream channels off-site to the east of Highway 29. Finally, there is no suitable breeding or rearing habitat for CRLF on site due to the shallow and ephemeral nature of the seasonal wetlands and the lack of any suitable riparian vegetation for cover. Thus, it is my professional opinion that the Project site lacks habitat for this species and that CRLF cannot access the site from surrounding occupied habitats to the east and southeast.

1.0 INTRODUCTION

A proposed development for 6 warehouse and office buildings on the Giovannoni Parcel within the northwest portion of the City of American Canyon, Napa County, California, has been proposed (Figure 1). Since the 210-acre site lies within the historic range for the California red-legged frog (*Rana draytonii*, hereafter CRLF) [Stebbins 2003], and is near occupied Critical Habitat for CRLF (USFWS 2010), a habitat assessment was conducted for this species.

2.0 PROJECT DESCRIPTION AND SETTING

The 210-acre project site is located between Devlin Road to the north and Green Island Road to the south in the northwestern part of American Canyon, Napa County (Project) [Figure 1]. The Project is now nearly entirely surrounded by industrial businesses and warehouse buildings,

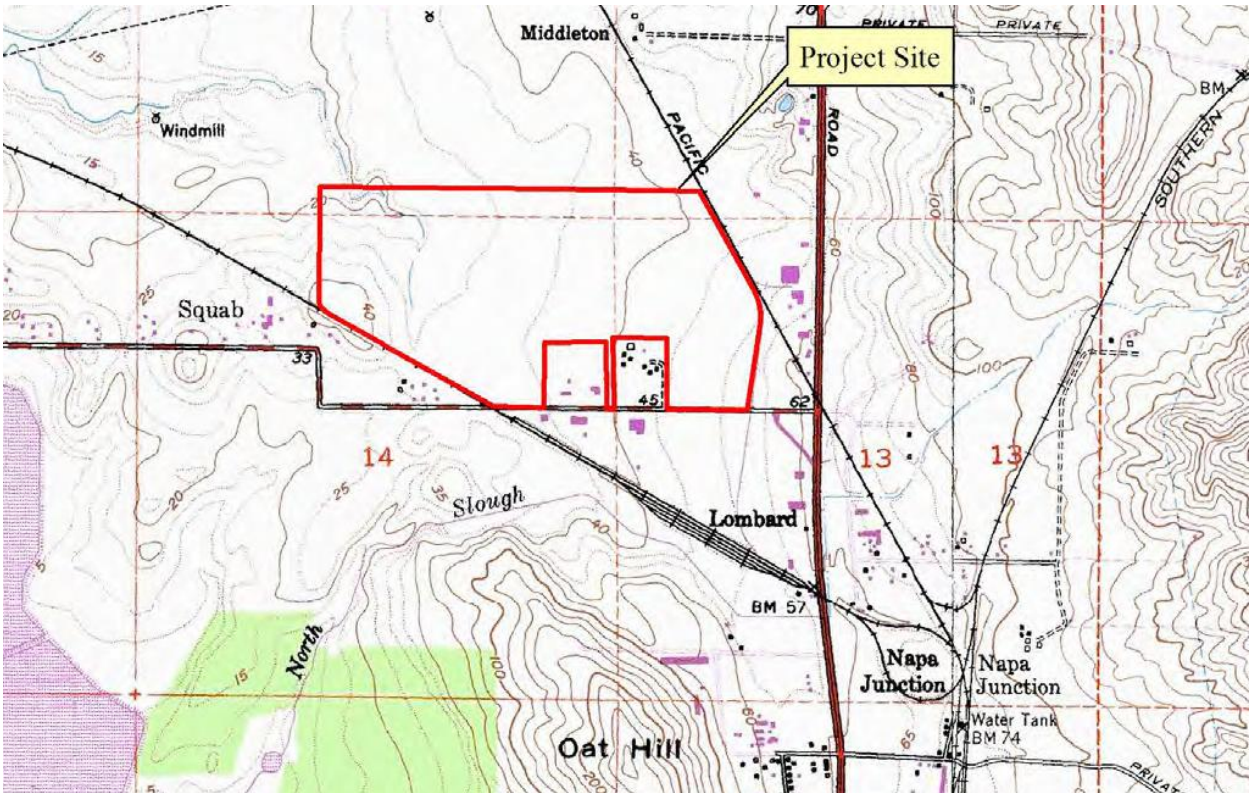

Figure 1. Location of 210-acre Giovannoni parcel within the City of American Canyon.

along with other structures, as well as Southern Pacific Railroad tracks to the south and east, and Highway 29 to the east (Figure 2). The Napa River estuary lies further to the west.

Figure 2. Location of the 210-acre Giovannoni parcel in American Canyon showing surrounding infrastructure and development. Google Earth photograph taken in 2020.

The Project site consists of an open field with a mosaic non-native annual grasses and seasonal wetlands that has used for cattle (*Bos taurus*) grazing. It is subject to sheet flooding which eventually drains northwest into an unnamed channel which continues off-site under Devlin Road and eventually drains into the Napa River estuary. There are no connections with other stream courses which drain the agricultural fields and hills east of Highway 29. The area is relatively flat with an elevational range of approximately 20-50 feet.

The Project site has been previously surveyed and mapped for wetlands by Monk and Associates (2018). They also conducted surveys for special status plants and animals, including CRLF on a small portion of the site (for the Devlin Road and Napa Valley Vine Trail Project). All of the wetlands were determined to be shallow and seasonal, with inundation limited to only about 3-4 months during the year after sufficient winter and spring rainfall.

There are no trees or dense riparian vegetation thickets of any type on site. Botta pocket gopher (*Thomomys bottae*) and California vole (*Microtus californicus*) burrows are scattered throughout the more upland areas.

3.0 METHODS

The methods employed to produce this report include evaluating the suitability of habitat for CRLF on site by conducting a reconnaissance-level site visit during the day by me on 10 February 2021. I followed the U.S. Fish and Wildlife Service protocol for the CRLF habitat assessment (USFWS 2005) and made observations regarding any amphibians and reptiles observed, or potentially inhabiting the vicinity. Additionally, CRLF occurrence records within 3.1 miles of the Project site (CNDDB 2021) were mapped. Finally, I examined 7.5' USGS quadrangles and aerial photographs for potentially suitable aquatic habitats within a 3.1-mile radius of the site and connectivity of these habitats with the Project site.

4.0 RESULTS AND DISCUSSION

No CRLF were observed during my day visit of the Project site on February 10, 2021 (see Appendix). I also did not observe any other amphibian species other than some Pacific treefrog (*Hyla regilla*) egg masses.

Suitable breeding and rearing habitat for CRLF is generally characterized by dense, shrubby riparian vegetation associated with deep (>2.3 feet), still or slow-moving water (see Jennings and Hayes 1994, Jennings 1988, Hayes and Jennings 1988). All of the inundated wetlands that I observed on site were too shallow and ephemeral to support a breeding population of CRLF.

These findings are consistent with previous findings recorded by Monk and Associates (2018) for a small portion of the proposed road alignments on through the eastern part of the Project site.

A review of the most recent California Natural Diversity Database files (CNDDB 2021) revealed that there are no records of CRLF in American Canyon west of Highway 29 almost certainly due to the high amount of vehicle traffic, highway berms, and stream courses being diverted into buried culverts below the freeway. Based on the data from the CNDDB, 3 CRLF occurrences are located within a 3.1-mile radius of the southeast corner of the Study Area, all located east of Highway 29 (Figure 3). The closest sighting is a single adult observed 0.6 miles to the east in the North Slough drainage on July 26, 2006, 2008 (Record #1062). The next closest is another single adult observed 1.1 miles to the southeast in a marsh area near an old quarry pond on August 04, 2008 (Record #896). The third closest is 2.4 miles to the southeast near the Flosden Road where multiple larvae, juveniles, and adults have been observed between 2008 and 2015 (Record #228). There are other records further away within Critical Habitat units SOL-2 and SOL-3 to east and southeast. However, there are no hydrologic connections with any streams that drain the agricultural fields and adjacent foothills east of Highway 29 (a finding also noted by Monk and Associates (2018, 2019). Additionally, the Project site is now nearly entirely surrounded by extensive urban development and infrastructure. Thus, there is no chance for any CRLF to access the site from occupied habitats to the east and southeast due to the presence of Highway 29 (as described above), as well as railroads, urban streets, fences, and buildings.

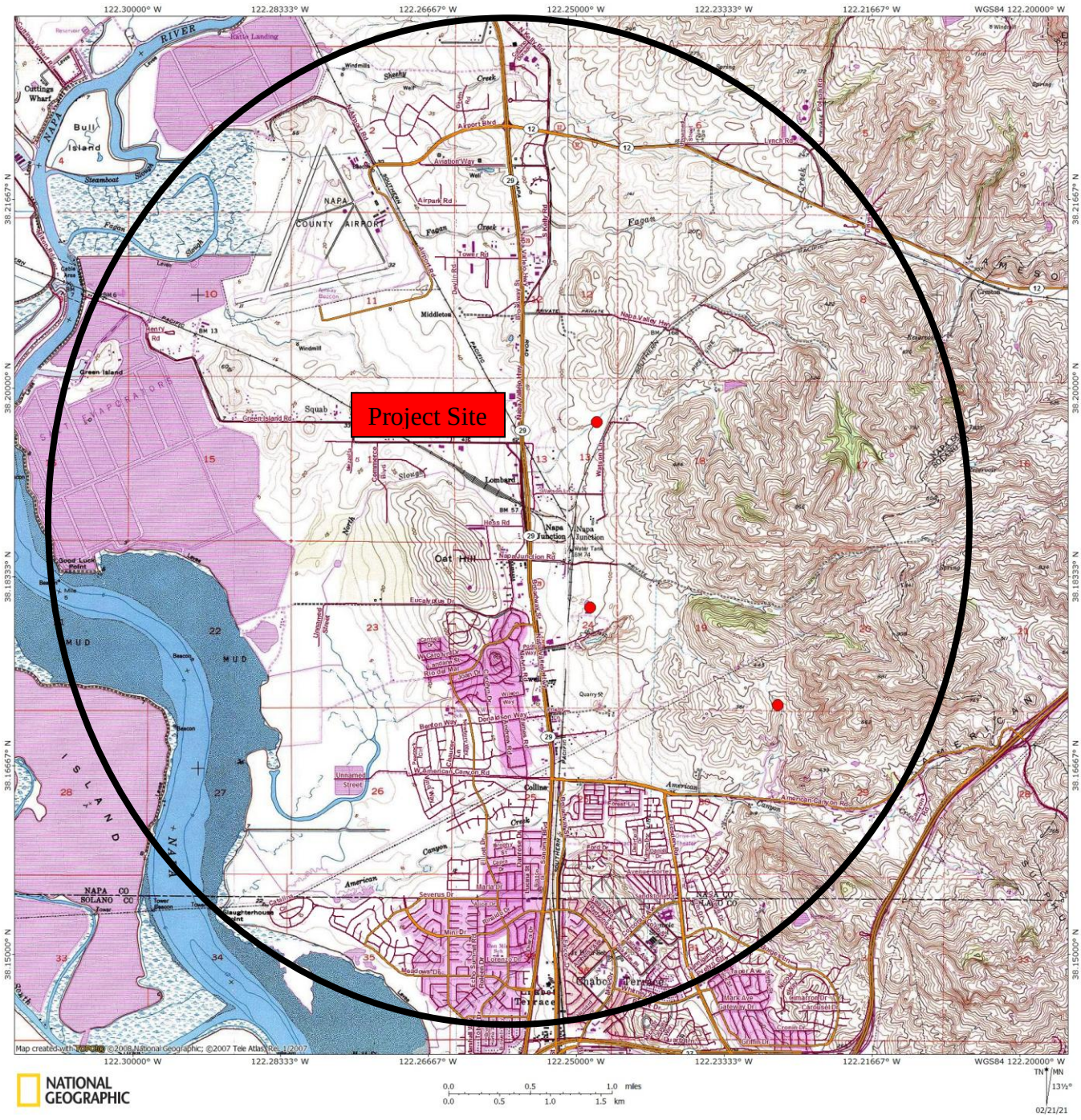

Figure 3. Locations of CRLF within 3.1 miles of the southeast corner of the Project site.

5.0 CONCLUSIONS

Although occupied CRLF habitat is present within 0.6-2.4 miles east and southeast of the Project site, all of these records lie east of Highway 29 which is a major barrier to any potential movements of CRLF to the west due to continuous traffic, highway berms, and the re-routing of

drainages into culverts under the freeway. Additionally, the Project is completely isolated from all areas to the east by Highway 29, railroads, buildings, and other urban infrastructure, and there are no hydrologic connections with any stream channels off-site to the east of Highway 29.. Finally, there is no suitable breeding or rearing habitat for CRLF on site due to the shallow and ephemeral nature of the seasonal wetlands and the lack of any suitable riparian vegetation for cover. Thus, it is my professional opinion that the Project site lacks habitat for this species and that CRLF cannot access the site from surrounding occupied habitats to the east and southeast.

6.0 REFERENCES

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7.0 APPENDIX

Data Sheet from Appendix D of the *Revised guidance on site assessment and field surveys for the California red-legged frog* (USFWS 2005) completed on 10 February 2021.

California Red-Legged Frog Habitat Site Assessment Data Sheet

Site Assessment reviewed by _____ _____ _____
(FWS Field Office) (date) (biologist)

Date of Site Assessment: 02/10/2021
(mm/dd/yyyy)

Site Assessment Biologists: Jennings, Mark _____
(Last name) (first name) (Last name) (first name)

_____ _____
(Last name) (first name) (Last name) (first name)

Site Location: Napa, City of American Canyon, T.4N, R.4W, Sections 1(NE) and 13(NW
(County, General location name, UTM Coordinates or Lat./Long. or T-R-S)

****ATTACH A MAP** (include habitat types, important features, and species locations)**

Proposed project name: Giovannoni Logistics Project
Brief description of proposed action: Proposed development of 6 warehouse and office buildings on a 210-acre site in the northwest portion of the City of American Canyon

1) Is this site within the current or historic range of the CRF (circle one)? (YES) NO

2) Are there known records of CRF within 1.6 km (1 mi) of the site (circle one)? (YES) NO
If yes, attach a list of all known CRF records with a map showing all locations.

GENERAL AQUATIC HABITAT CHARACTERIZATION

(if multiple ponds or streams are within the proposed action area, fill out one data sheet for each)

POND:
Size: 8' x 15' Maximum depth: 4 inches

Vegetation: emergent, overhanging, dominant species: mostly sedges and grasses with a few cockleburs. No trees or denser riparian vegetation present

Substrate: clay and sand.

Perennial or Ephemeral (*circle one*). If ephemeral, date it goes dry: April - May most years

California Red-Legged Frog Habitat Site Assessment Data Sheet

STREAM:

Bank full width: 2 feet
Depth at bank full: 1 foot
Stream gradient: 2 degrees

Are there pools (circle one)? YES (NO)

If yes,

Size of stream pools: _____
Maximum Depth of stream Pools: _____

Characterize non-pool habitat: run, riffle, glide, other: Mostly riffle.

Vegetation: emergent, overhanging, dominant species: Grasses and sedges. No willows or cattails or rushes.

Substrate: Clay and sand

Bank description: Ruderal grasslands.

Perennial or (Ephemeral) (*circle one*). If ephemeral, date it goes dry: April - May most years

Other aquatic habitat characteristics, species observations, drawings, or comments:

Only observed is Pacific treefrog egg masses. Lots of California vole and Botta pocket gopher burrows present.

Area used for livestock grazing. Now completely surrounded by development and urban infrastructure.

Wetlands too ephemeral and shallow to be used by CRLF. Thus, no habitat present. Also, no riparian connection with drainages to the east of Hwy 29. Therefore, adjacent CRLF occupied habitats to the east and southeast are disconnected from the project site and no overland movements can occur to the site.

Necessary Attachments:

1. All field notes and other supporting documents
2. Site photographs.
3. Maps with important habitat features and species locations

ATTACHMENT 3.

USACE Approved Jurisdictional Determination Map

U.S. Army Corps of Engineers
San Francisco District
Regulatory Division

Approved Jurisdictional Determination for
Giovannoni Property,
requested by Monk & Associates, Inc.,
Green Island Road, City of American Canyon,
Napa County, California
Lat. 38.199°N / Long. 122.267°W

Corps File Number 2016-00309N
Date: October 25, 2016

Study Area Boundary

Areas subject to Section 404 of Clean Water Act

11.93 acres (11.84 acres and 2,466 lineal feet)

Sheet 1 of 1

Data Points
Wetlands (515,590 Sq. Ft., 11.84 Acres)
Linear Wetlands (2,466 Lin. Ft., 4,051 Sq. Ft., 0.09 Acre)
Isolated Wetlands (36,677 Sq. Ft., 0.84 Acre)
RCP
Project Site (~208 Acres)

Wetland #	Sq. Ft.	Wetland #	Sq. Ft.	Wetland #	Sq. Ft.	Wetland #	Sq. Ft.	Wetland #	Sq. Ft.	Wetland #	Sq. Ft.	Wetland #	Sq. Ft.
W 1	9,063	W 14	24	W 27	144	W 40	358	W 53	309	W 66	172	W 79	2,320
W 2	44,951	W 15	495	W 28	140	W 41	951	W 54	665	W 67	808	W 80	2,253
W 3	357	W 16	144,468	W 29	1,510	W 42	267	W 55	315	W 68	1,397	W 81	1,441
W 4	472	W 17	1,972	W 30	221	W 43	36	W 56	362	W 69	116	W 82	688
W 5	208	W 18	33	W 31	181	W 44	1,151	W 57	45	W 70	197	W 83	2,655
W 6	23	W 19	64	W 32	302	W 45	1,112	W 58	154	W 71	148	W 84	9,569
W 7	1,970	W 20	290	W 33	4,647	W 46	40	W 59	56	W 72	10,123	W 85	74
W 8	164	W 21	202	W 34	1,637	W 47	200	W 60	71	W 73	6,448	W 86	2,188
W 9	253	W 22	354	W 35	43	W 48	389	W 61	1,914	W 74	47	W 87	149
W 10	485	W 23	350	W 36	297	W 49	988	W 62	249	W 75	978	W 88	222,087
W 11	110	W 24	3,371	W 37	130	W 50	38	W 63	3,903	W 76	55	W 89	195
W 12	271	W 25	3,102	W 38	75	W 51	5,161	W 64	47	W 77	785	W 90	3,151
W 13	35	W 26	603	W 39	765	W 52	10	W 65	115	W 78	4,858		

Linear Wetland #	Width	Length	Sq. Ft.
LW 1	1	115	115
LW 2	1	225	225
LW 3	2	4	8
LW 4	2	19	38
LW 5	3	470	1,410
LW 6	1	394	394
LW 7	1	253	253
LW 8	1	197	197
LW 9	1	87	87
LW 10	2	522	1,044
LW 11	3	50	150
LW 12	1	130	130

Isolated Wetland #	Sq. Ft.
IW 1	62
IW 2	97
IW 3	229
IW 4	3,117
IW 5	17,019
IW 6	935
IW 7	853
IW 8	481
IW 9	1,159
IW 10	12,725

Green Island Road

0 100 200 400 600 800 1,000 Feet

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Sheet 1. Confirmed Aquatic Resources Delineation Map
Giovannoni Project Site
City of American Canyon, California

Scale: 1 inch = 200 feet
Delineation Conducted by: Geoff Monk, Hope Kingma & Devin Jokerst
Aerial Photograph Source: ESRI
Map Confirmation Date: September 26, 2016
Map Confirmed by Daniel Breen, Corps
Map Preparation Date: October 25, 2016