Biological Resources Evaluation
Willow Creek Daylighting
Sausalito, California
March 2026

Prepared for:
Sausalito Marin City School District
200 Philips Drive
Marin City, CA 94965

Prepared by:
PCI Ecological
103 Morris Street, Suite A-5
Sebastopol, CA 95472

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1 Introduction

PCI Ecological (PCI) was retained by the Sausalito Marin City School District (District) to provide consulting biological, design, and permitting services for the Willow Creek Daylighting Project on the campus of the Dr. Martin Luther King, Jr. Academy (Academy) in Sausalito, Marin County, California. The proposed project involves the daylighting of a segment of Willow Creek, which is currently piped beneath the campus. The proposed project will include daylighting Willow Creek flows from a buried storm drain to flow through a natural channel, restoration of native riparian vegetation, creation of outdoor educational spaces, and construction of an ADA-accessible trail system. To help inform project design and support permit acquisition, PCI completed a biological resources evaluation of the project area. Initial findings were provided to the project team during the design process to help guide the design in supporting native plants and wildlife. This report presents the - findings of the evaluation, including: 1) descriptions of plant, wildlife, and aquatic resources within the project area; 2) determinations of the potential impacts of the proposed project on sensitive biological resources, as well as a brief overview of benefits to native plants and wildlife; and 3) recommendations for avoidance, minimization, and mitigation measures to protect biological resources during construction activities.

2 Setting and Project Description

The proposed project is on the 12-acre campus of the Academy at 636 Nevada Street (122.5036022°W 37.8637327°N; Figure 1). The perennial Willow Creek currently runs through a storm drain underneath the campus. Elevations across the proposed project area range from approximately 50 to 110 feet above sea level. Surrounding land uses include residential neighborhoods, the City of Sausalito public right-of-way, and the Golden Gate National Recreation Area to the northwest across Highway 101.

The Willow Creek watershed above the downstream end of the Academy campus encompasses approximately 125 acres. The creek originates in the Golden Gate National Recreation Area and then passes through the northern portion of Sausalito. Currently, almost the entire length of the stream from Highway 101 to Richardson Bay has been channeled through a storm drain. South of the Academy campus (180 feet), and immediately downslope of Highway 101, is a eucalyptus stand where Willow Creek surfaces for about 20 feet before being piped underneath the school. This short segment is one of the few areas where the creek reaches the surface and is accessible by humans and wildlife (see *Appendix A - Project Area Photographs*).

The proposed Willow Creek restoration project will daylight approximately 950 linear feet of creek, restore native riparian vegetation within the adjacent corridor, provide a creek-side outdoor classroom and assembly area, and connect these features with a new ADA-accessible trail system with two pedestrian bridges. The project also includes reuse of approximately 9,000 cubic yards of excavated soil to develop site features, including a building pad for potential future classroom buildings, and a small knoll where the creek daylighting starts. As of March 2026, the existing classrooms and library buildings on the western side of the campus and some accompanying hardscapes had been demolished and removed.

Construction access for the proposed project will be from Nevada Street, Buchanan Drive, and along an existing fire access road that navigates the perimeter of the previously existing classroom and library buildings. Staging areas will be established along the fire access road and within previously disturbed and demolished areas. Based on the 65% design plans, approximately 178 trees will be removed, including 5 California bay (*Umbellularia californica*), 10 coast live oak (*Quercus agrifolia*), and 4 toyon (*Heteromeles arbutifolia*; a large shrub/small tree species). The remainder of the trees to be removed are non-native invasive or ornamental species. Extensive revegetation with a diverse suite of native trees, shrubs, perennials and grasses will follow construction.

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Figure 1

Project Area and Location

Willow Creek Daylighting
Sausalito, CA

Project area
Willow Creek watershed boundary
Willow Creek current surface flow

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March 2026
Sources:
Basemap - ESRI 2025
Project area - PCI 2026

3 Field Survey Methods

Biological field surveys of Willow Creek Daylighting project area were completed on March 24, 2026 and April 14, 2025 by PCI biologist Erynn Rebol, who is familiar with the area's flora and fauna.

Two separate efforts also provided background information for the evaluation. In 2012, PCI conducted a biological evaluation of the downstream Willow Grove Open Space Easement for the City of Sausalito to support development of vegetation management plans for that site. The Willow Grove area is the next downstream location where the creek is above ground and serves as one of the reference areas for the Daylighting project. PCI is also conducting monitoring of baseline site conditions for the Daylighting project (PCI 2025), under contract to Friends of Willow Creek, to help document project benefits. This monitoring includes wildlife camera monitoring and vegetation assessment. On February 14, 2025, two wildlife cameras were installed within the project area, and one was installed next to the above-ground stream segment in the eucalyptus grove south (upstream) of the project area. Photos from these cameras are downloaded monthly and analyzed on an approximately quarterly basis. On April 14, 2025, PCI ecologist Claire Pavelka conducted a baseline evaluation of vegetation within the main portion of the project area, using relevés[1] to document vegetation types and cover of native and non-native vegetation. Photo documentation was also conducted; see *Appendix A: Project Area Photographs*.

The March 24, 2026 and April 14, 2025 field surveys included a general assessment of habitats in the project area and inventories of species observed or potentially occurring within the site; the survey did not include protocol-level focused surveys for special-status plant or animal species. The primary purposes of the assessment were to characterize biological communities and habitat conditions within the project area, determine whether suitable habitat for special-status species is present, provide information to help guide design for benefits to biological resources, identify potential project-related effects and support identification of appropriate construction-period avoidance and minimization measures. The potential for presence of and effects on special-status species and habitats was determined based on-site observations, habitat conditions, the presence of unique habitat features, proximity of the site to reported occurrences, geographic range of subject species, and the nature of the proposed disturbance.

BOTANICAL SURVEY. Plants observed were identified using the Jepson eFlora (Jepson Flora Project 2026) to the taxonomic level necessary to determine whether they were rare. Botanical nomenclature follows the Jepson eFlora. Representative plant species observed within the project areas are provided in the sections that follow. For a full list of all plant species observed within the project areas, see *Appendix B – Plant Species Observed*. Due to the timing of botanical surveys, some species may not have been visible and/or were unable to be identified. Vegetation alliances were identified based on visual assessment in the field and comparison with Manual of California Vegetation (CNPS 2026) definitions; no detailed quantitative data were collected.

[1] The relevé method of vegetation sampling uses visual estimates of plant species cover, within relatively homogeneous stands, to describe and classify vegetation types.

WILDLIFE SURVEY. The wildlife survey was conducted with the aid of binoculars. Visual cues (e.g., nests, tracks, scat, burrows, skeletal remains), calls, songs, and direct observations were used to identify wildlife. Unique habitat features (e.g., woody debris, water sources, etc.) and other plant materials were examined for the presence of mammals, amphibians, reptiles, birds, and invertebrates. Wildlife species observed within the project area, in addition to species likely to occur in that setting, are provided in the sections that follow. Additional wildlife data from ongoing camera trap monitoring within the project area is also included in the following section. No aquatic sampling was completed as part of the assessment.

4 Soils and Landcover

Soil qualities can be an important factor in plant community composition. Soils in the project area are mapped as mostly Cronkhite-Barnabe complex series, 30 to 50 percent slopes (NRCS 2026). These are moderately well-drained soils of varying depths, with slow to moderate permeability, derived from weathered sandstone and shale. Typical vegetation supported by this soil type includes annual grasses and forbs (e.g. lupine, plantain, thistle) and shrubs. The southernmost tip of the project area, near the eucalyptus tree stand, is mapped as Los Osos-Urban land-Bonnydoon complex, 15 to 30 percent slopes (NRCS 2026). The Los Osos and Bonnydoon series are soils of varying depths, well-drained to somewhat excessively drained, formed from weathered sandstone and shale; they typically support vegetation such as annual grasses and forbs with some perennial grasses, coastal sagebrush, and live oak. The Urban Land soil type comprises soils heavily modified by human activity, often with high compaction and imported fill materials. A significant portion of the project area supports urban land cover, including asphalt, buildings, sidewalks, etc.

5 Vegetation and Wildlife Resources

Vegetation

Campus infrastructure is present throughout most of the project area. Patches of ruderal herbaceous vegetation, scattered ornamental plantings, and predominantly non-native forest stands are interspersed between developed areas and along the edges of the campus, with occasional native trees and shrubs (Figure 2). A number of mature coast live oaks and toyon are present.

Ruderal herbaceous vegetation is present adjacent to hardscape in the center of the campus and along the periphery of forest stands. These patches are dominated by non-native grasses and forbs, including ripgut brome (*Bromus diandrus*), upright veldt grass (*Ehrharta erecta*), Bermuda buttercup (*Oxalis pes-caprae*), cut-leaf geranium (*Geranium dissectum*), fennel (*Foeniculum vulgare*), and bur cover (*Medicago polymorpha*). This area was mapped as the wild oat and annual brome grassland alliance during baseline vegetation monitoring for Friends of Willow Creek (PCI 2025).

Non-native forest stands are present along the northern edge of campus, along either side of the fire access road. A number of mature coast live oak are also present scattered within this area but form only 0 to 20% of the tree cover. Non-native woody and herbaceous species are dominant. Trees present include plum (*Prunus* sp.), palm (*Arecaceae* family), and acacia (*Acacia* sp.), with shrubs [cotoneaster (*Cotoneaster* sp.), French broom (*Genista monspessulana*)], and English ivy (*Hedera helix*) in the understory. Herbaceous vegetation is also dominated by non-natives, including upright veldt grass, ripgut brome, Italian thistle (*Carduus pycnocephalus*), fennel, wild carrot (*Daucus carota*), and three-cornered leek (*Allium triquetrum*). Native species were observed in a few locations and include California bay (*Umbellularia californica*), coast live oak (*Quercus agrifolia*), toyon (*Heteromeles arbutifolia*), coyote brush (*Baccharis pilularis*), honeysuckle (*Lonicera hispidula*), and miner's lettuce (*Claytonia parviflora*).

A dense eucalyptus grove is present at the southern end of the project site. Mats of English ivy are present in the understory. Species diversity is greater around the periphery of the eucalyptus stand, with native species such as California bay, coast live oak, poison oak (*Toxicodendron diversilobum*), California manroot (*Marah fabacea*), and California bee plant (*Scrophularia californica*) present. The western portion of the stand includes a large patch of non-native Himalayan blackberry (*Rubus armeniacus*), with ornamental plum and English ivy also present.

Native plant habitat quality throughout the project site is relatively low. Most of the project site is developed, and the remainder is dominated by non-native and invasive species. Native species are very limited in abundance and diversity. However, the few mature native oaks do provide important ecological values, and even the non-native trees provide some resources for native wildlife; see discussion below.

> *Project Impacts on Native Vegetation:* The project will result in many benefits to native plants (see Section 7) and some negative impacts from construction. Ten (10) native coast live oak, 5 bay, as well as 4 toyon will be removed for project grading, but extensive native planting will occur, including approximately 200 native trees and 130 willows and other large shrubs. Diameters at breast height of the trees to be removed are:
>
> - Bays: 6" (5 trees)
> - Coast live oak*:* 8", 10", 16", 18", and 6 multi-stemmed with stem DBH ranging from 6" to 24" DBH.
>
> Construction could impact nearby native trees if soil compaction or incidental injury occurs. Soil disturbance could facilitate the spread of invasive species, and imported materials (plants, mulch, gravel, etc.) could introduce weed seed or plant pathogens. However, with Protection Measures (see Section 7) in place, these impacts will be avoided.

Fish and Wildlife Resources

The urban forested and grassy areas are dominated by invasive species but provide limited nesting, food, movement, and shelter opportunities for wildlife species adapted to human proximity. The native mature coast live oaks provide valuable wildlife resources such as shade,

cover, nesting habitat while their acorns are an important food source for deer, squirrels, and many bird species. Birds are the most abundant, diverse, and prominent wildlife species observed; Bewick's wren, yellow-rumped warbler, and hairy woodpecker were seen on the April 2025 visit. Suitable foraging and breeding habitat also exists in the surrounding areas for some raptors and owls; red-tailed hawks were heard and great horned owls were observed on wildlife camera footage. These pockets of vegetation in an otherwise urban landscape can serve as important resources for birds and wildlife that can tolerate human activity.

The areas of ruderal herbaceous vegetation support marginal food resources (e.g., grass seeds, insects) for songbirds and small rodents, which in turn serve as prey sources for raptors and owls. The non-native forest and eucalyptus stand have areas with dense foliage and a few snags, providing suitable cover and nesting habitats for birds and shelter and movement opportunities for mammals (raccoons, foxes, skunks, etc.). The non-native tree and eucalyptus stand likely provides day roosting habitat for bat species. Larger mammals such as deer can find small pockets of forage amongst the non-native forest patches and shady screened areas for daytime resting. Two coyotes were caught on camera moving through the project area both at night and in the early morning.

Species observed (directly or via scat, tracks, or other evidence) during the 2025 survey and from camera trap monitoring data:

<u>Birds</u>
American crow
American robin
Anna's hummingbird
black phoebe
Bewick's wren
California quail
chestnut-backed chickadee
dark-eyed junco
great-horned owl
hairy woodpecker
house finch
lesser goldfinch
pygmy nuthatch
red-shouldered hawk
red-winged blackbird
ruby-crowned kinglet
song sparrow
spotted towhee
Stellar's jay
white-crowned sparrow
yellow-rumped warbler

<u>Mammals</u>
black-tailed deer (tracks, scat, camera)
coyote (camera)
eastern gray squirrel
gray fox (scat, camera)
Norway black rat (camera)
raccoon (camera)
striped skunk (camera)
western gray squirrel

Project Impacts on Common Wildlife: Willow Creek does not provide much habitat value for common wildlife in its current condition flowing in a buried storm drain. The project will have strong benefits to common wildlife species (see Section 7), with minimal potential for short-term negative impacts from construction. The loss of mature coast live oaks and

other vegetative cover will temporarily reduce wildlife habitat (e.g. cover for deer, nesting habitat for birds) until restoration plantings are established. The remaining vegetation within the project area (outside grading extent) and nearby will continue to provide limited habitat for wildlife as native vegetation grows. The revegetation plan is designed to more than replace the native tree habitat lost and create substantial additional wildlife benefits with the daylighted creek (see Section 7). Protection Measures (see Section 7) will be in place to avoid or minimize impacts of construction activity could otherwise injure, entrap, or kill small mammals such as squirrels or reptiles such as western fence lizards. See Section 6 for discussion of nesting birds, bats, and other special-status wildlife.

Wildlife Movement

Black-tailed deer have been documented using the narrow undeveloped corridor along the east side of Highway 101, just south of the project area, for north-south movement between fragmented woodland patches within the surrounding urban matrix. Within the project area, non-native and eucalyptus forest patches appear to facilitate east-west movement, likely connecting to the Willow Grove area downstream, a short stretch of undeveloped riparian corridor with substantial tree cover, browse, and a daylighted creek reach. Camera trap data and direct observation confirm that deer actively use the non-native and eucalyptus forest patches for both movement and daytime rest (PCI, pers. obs.). Other mammals documented on camera (coyotes, gray fox, raccoon, skunk, etc.) likely utilize the same corridors for foraging and movement.

Project Impacts on Wildlife Movement

The buried stream currently does not provide wildlife movement potential. Daylighting the stream will allow wildlife to use the stream corridor for safe movement across the urban matrix. Removal of non-native and eucalyptus forest patches will temporarily reduce vegetative cover along the east-west movement corridor through the project area. However, stands of trees in the surrounding areas outside the project area will not be affected by the project and construction activities are not anticipated to create a barrier to wildlife movement; rather, individuals are expected to adjust movement timing in response to this short-term disturbance and reduced available vegetative cover. In the long-term, project implementation will benefit wildlife movement by providing an expanded corridor with structurally diverse native vegetation, improved water access, and increased canopy and understory cover following plant establishment.

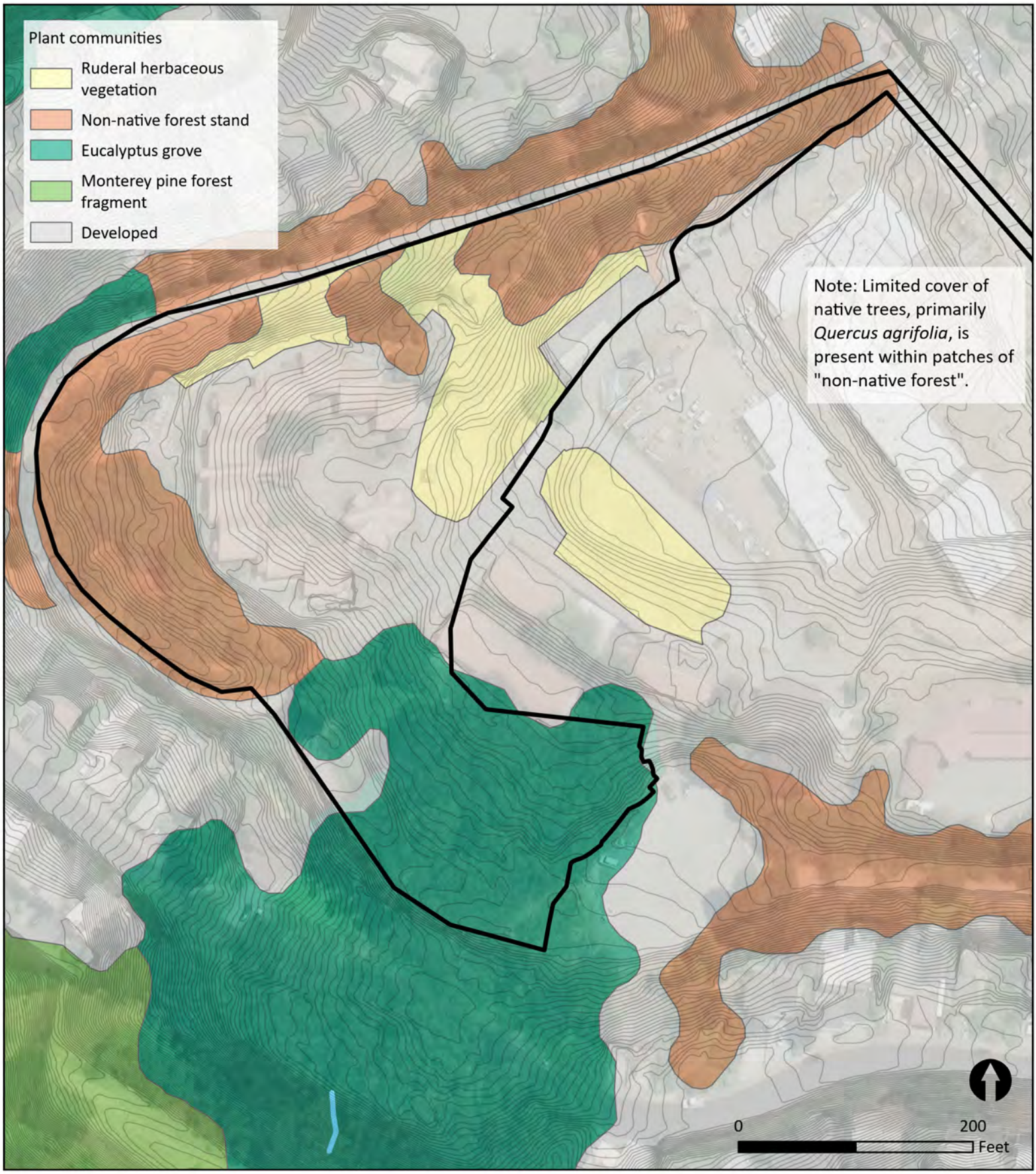

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Figure 2

Plant Communities

Willow Creek Daylighting
Sausalito, CA

March 2026
Sources:
Basemap - ESRI 2025
Project area - PCI 2026
Vegetation & contours - Marin Co Veg Map 2013

6 Special-status Species and Sensitive Habitats

PCI conducted background literature and database searches to determine the potential for occurrence of special-status plant and animal species, and sensitive habitats, within the project area. The search focused on reported occurrences for the Point Bonita 7.5' USGS quadrangle, which the project is located near the edge of, and the adjacent San Francisco North quadrangle. General references, including aerial photographs, were also consulted to evaluate the potential for unique biological communities and special-status species. The review included the following sources:

- California Department of Fish and Wildlife Natural Diversity Database (CNDDB)[2] (CDFW 2026a)
- California Sensitive Natural Communities (CDFW 2026b)
- Calflora database (Calflora 2026)
- Information for Planning and Conservation (IPaC) Trust Resource List for the project area (USFWS 2026)
- Jepson Flora Project (Jepson 2026)
- Natural Resources Conservation Service Web Soil Survey (NRCS 2026)
- PCI's Biological Resources Assessment for the Willow Grove Open Space Easement, prepared for the City of Sausalito (2012)
- Field guides and general references for plants, birds, mammals, reptiles, amphibians, and invertebrates.

Definition of Special-status Species

In California, special-status plants and animals include those species that are afforded legal protection under the federal and California Endangered Species Acts (ESA and CESA, respectively) and other regulations. These species must be considered during project evaluation to comply with CEQA, during consultation with State and federal resources agencies, and in development of specific management guidelines for resource protection. Special-status species are defined as the following:

- Species listed or proposed for listing as threatened or endangered under the federal ESA;
- Species listed or proposed for listing as threatened or endangered under CESA;
- Species that are recognized as candidates for future listing by agencies with resource management responsibilities, such as U.S. Fish and Wildlife Service (USFWS), NOAA's National Marine Fisheries Service (NMFS), and California Department of Fish and Wildlife (CDFW).
- Species defined by CDFW as California Species of Special Concern (SSC);

[2] The California Natural Diversity Data Base (CNDDB) is a repository of information on sightings and collections of rare, threatened, or endangered plant and animal species within California. It is maintained by CDFW. CNDDB reports occurrences of special-status species that have been entered into the database and does not generally include inventories of more common animals or plants. The absence of a species from the database does not necessarily mean that they do not occur in the area, only that no sightings have been reported. In addition, sightings are subject to observer judgment and may not be entirely reliable as a result.

- Species classified as Fully Protected by CDFW;
- Plant species, subspecies, and varieties defined as rare or threatened by the California Native Plant Protection Act (California Fish and Game Code Section 1900, et seq.);
- Per CNPS and CDFW guidance, some plant taxa listed as CRPR 3 or 4 (i.e., taxa ranked as needing further study, or of limited distribution), depending on circumstances such as local rarity, location on the periphery of the taxa's distribution, or having occurrences on unusual substrates or rare and declining habitats;
- Species that otherwise meet the definition of rare, threatened, or endangered pursuant to Section 15380 of the CEQA Guidelines, and
- Mountain lions protected under the California Wildlife Protection Act of 1990 (Proposition 117) and designated as a "specially protected mammal in California."
- Native nesting birds, including species identified in the Migratory Bird Treaty Act and species defined by USFWS as Birds of Conservation Concern (BCC).

Additional species found on the Special Animal and Special Plant Lists maintained by CDFW may be included in reporting and analysis based on the project elements, location and potential impacts (CDFW 2026c, 2026d). These include taxa designated as a special status, sensitive, or declining species by other state or federal agencies (other than CDFW or USFWS; e.g. US Forest Service) or a non-governmental organization (e.g., The Western Bat Working Group), and determined by the CNDDB to be rare, restricted, declining, or threatened across their range in California. Also included are species that are considered of special concern to CDFW due to lack of adequate information to permit listing or rejection for state or federal status and have not been designated as California Species of Special Concern.

Evaluation Criteria

The potential for special-status species to occur on the Project Areas was reviewed and classified into the following categories: not present, not likely to occur, moderate potential to occur, high potential to occur, or present. The criteria for each of these categories are:

> **Not Present** – Suitable habitat is not present within the project area; the site lacks critical habitat requirements for the species and/or project area is outside the range of the species.
> **Not Likely to Occur –** One or more key habitat components is absent from the project area; no known occurrences in region; or habitat present but species not observed during field surveys that would be expected to discover species, if present, based on season and level of effort. Species is unlikely to occur within the project area.
> **Moderate Potential to Occur –** Some of the habitat components required by this species are present within the project area and/or marginally suitable habitat is present within surrounding areas. Field surveys did not confirm or rule out species presence. Species may occur within the Project Area.
> **High Potential to Occur –** All of the habitat components required by this species are present within the project area and/or it is known to occur in surrounding areas. Field surveys did not confirm or rule out species presence. Species is likely to occur within the

Project Area.

Present – Species has reported occurrences within the project area that are believed to be still extant and/or species was observed within the project area during field surveys.

Figure 3 provides a map of reported occurrences of special-status species in the project region, from the CNDDB (CDFW 2026a).

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Figure 3

Special-status Species Reported Occurrences

Willow Creek Daylighting
Sausalito, CA

This map is intended for agency and landowner use only. The occurrences shown on this map represent the known locations of the species listed here as of the date of this map. There may be additional occurrences and/or additional species within this area that have not yet been surveyed and/or mapped. Lack of information in the CNDDB about a species or an area can never be used as proof that no special-status species occur in the area.

● Spotted Owl Observations

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March 2026
Sources:
Basemap - ESRI 2025
Project area - PCI 2026
CNDDB - CDFW 2026a

Special-status Plants

Based on the background literature review, a number of special-status plant species were identified as having the potential to occur within the project region (Figure 3). Species with reported observations in close proximity to the project site and/or in habitat types of relevance were evaluated. Species occurring in habitat types not present in the project site (i.e. salt marsh, coastal dunes, chaparral, serpentine) were not evaluated.

No special-status plant species were observed by PCI within the project area during the April 2025 survey, and none were determined to have moderate or high potential to occur. The site is highly disturbed, has minimal native plant diversity, and lacks habitat for rare plant species.

Sensitive Habitats

California Department of Fish and Wildlife (CDFW) ranks natural communities based on their rarity and vulnerability to human impacts. Communities – currently described in terms of vegetation alliance and/or association[3] -- are given both a state level ("S") and global ("G") ranking; those listed as critically imperiled (Rank 1), imperiled (Rank 2), or vulnerable (Rank 3) within the state are considered special-status, defined as "communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects" (CDFW 2026b). In addition, riparian and wetland habitats are typically considered sensitive based on federal, State, and/or local policies, and oaks or oak habitats are often afforded special protections by county or local policies.

None of the plant communities within the project site qualify as sensitive based on CDFW ranking, as they are dominated by non-native and invasive species, and they are not currently functioning as riparian or wetland. Mature coast live oaks are present on the site, and some will be removed as part of the creek daylighting project. The property is owned by the Sausalito Marin City School District and is not subject to City of Sausalito tree removal permitting; nonetheless, the proposed project includes a robust revegetation component that includes tree replacement with the intent of meeting tree replacement ratios to the extent feasible. While less than 20 native trees are to be removed, the project revegetation plans include planting of more than 340 native trees and large shrubs to establish wooded riparian and upland habitats. See *Project Impacts on Native Vegetation*, above, for information on impacts to native oaks.

Special-status Wildlife

Based on the background literature review a number of special-status wildlife species were identified having the potential to occur within the project area; see Figure 3. PCI evaluated these species for potential occurrence within the project area based on field observations, suitability of habitat within the project area, and proximity of recorded sightings; see *Appendix D: Special-*

[3] The Manual of California Vegetation (MCV; CNPS 2026) provides membership rules for alliances but not for associations. The MCV references other documents that provide association-level information, but those documents are not always readily available for review. For this report, associations were determined based on dominant species within each layer and comparison with referenced regional project-level reports if available. Where the MCV-provided associations did not completely match observed stand composition, the best fit alliance was selected.

status Fish and Wildlife Species Evaluated for Potential to Occur. Listing status[4] is based on CDFW (2026c). Species requiring habitat types not present in the project area (e.g., green sea turtle, western snowy plover, etc.) are not included in the table.

Special-status wildlife species determined to have moderate to high potential to occur in the project area are:

- Hoary bat (*Lasiurus cinereus*), medium priority species with the Western Bat Working Group
- Western red bat (*Lasiurus blossevillii*), SSC, high priority species with the Western Bat Working Group

All species evaluated for potential to occur are discussed in *Appendix D: Special-status Fish and Wildlife Species evaluated for Potential to Occur*.[5]

In addition to the special-status species listed above, several species designated as Birds of Conservation Concern (BCC; USFWS 2026)[6] are reported for this area and may occur in the surrounding landscape (i.e., Allen's hummingbird, Nuttall's woodpecker). Many of these species are locally common and others are highly unlikely to be present on site. Bald and golden eagles are designated as BCC and, in addition, are also protected under the federal Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c) of 1940. These species are not described further in this report but should be protected in accordance with the protected bird species recommendations in Section 7.

Nesting Birds

Nesting native bird species are protected under both federal and State regulations; California Fish and Wildlife Code (§3503 and §3513) protects birds and their nests, while the federal Endangered Species Act and California Endangered Species Act protects any nesting threatened and endangered bird species. If construction occurs within the typical nesting season (March 15 – August 15), protection measures outlined in Section 7 will be implemented to avoid impacts to nesting birds.

> *Project Impacts to Nesting Birds:* The project area supports nesting, foraging and breeding habitat for a number of native bird species. If nesting birds are present on the project site (nesting in trees within or adjacent to the project site) during construction, nesting behavior could be altered and nests could be abandoned. To minimize impacts on these nesting birds, construction work is planned to occur August 15 through February 14 (see Section 7: *Protection Measures*). This will avoid the nesting season for most bird species

[4] Listing Status: FE-federally listed as endangered, FT-federally listed as threatened, BCC-Bird of Conservation Concern, ST- State listed as threatened, SE-State listed as endangered, Candidate ST-State candidate to be listed as threatened under CESA, FP-State of California fully-protected species, SSC-California Species of Special Concern, and WL-Watch List (CDFW 2025d).

[5] Species that require habitat not present within or immediately adjacent to the project area, and species whose ranges do not include the project area, are not included in the table.

[6] The BCC designation is used by USFWS to identify bird species of high conservation priority that deserve proactive attention but are not currently designated as endangered or threatened. BCCs are protected under the Migratory Bird Treaty Act (MBTA).

(typically March 15 – August 15). If project work occurs outside this window, nesting bird surveys will be conducted by a qualified biologist before any construction activities begin (see Section 7, Protection Measures). The project will expand nesting bird habitat through the newly created riparian corridor, and no long-term impacts to nesting birds are expected.

Special Status and Common Bat Species

There are approximately 25 bat species with known occurrences within Northern California. Bats are highly mobile and many are migratory. Foraging habitats range from woodlands, forests, and grasslands to open water. Most Marin County bat species are insectivorous and feed by echolocation. Bats use caves, mines, buildings, bridges, tree hollows, curled leaves or tree bark, and other natural and man-made crevices for roosting. One special-status bat species (western red bat) has been documented in the surrounding area (approximately 4 miles northwest from project area, in a forested area, 2014; iNaturalist 2026a). Focused surveys for bats were not performed as part of this biological assessment; however, the western red bat, as well as common bat species (such as the hoary bat; *Lasiurus cinereus*, medium priority species with the Western Bat Working Group) may use the trees in the non-native and eucalyptus forest patches for day or night roosting.

Project Impacts to Bats: Roosting bats may be present during construction within the project area; trees (in both non-native and eucalyptus forest patches) provide potential day- and night-roosting habitat (leaves, curled bark) for the western red bat and other common bat species (hoary bat). It is likely multiple bat species forage across the project area at night. No construction will occur at nighttime when bats are most active so no impacts to foraging will occur. The project is expected to benefit multiple bat species by increasing habitat diversity, water resources, and invertebrate prey availability through the daylighting of the creek and restoration of riparian vegetation. Approximately 200 trees of various sizes, some potentially providing bat roosting habitat for western red bat and common bat species, will be removed or impacted during project construction. Project revegetation plans include planting of more than 340 native trees and large shrubs to establish wooded riparian and upland habitats. Protection measures will be in place to avoid or minimize impacts to roosting bats that may be present during project work activities (see *Section 7: Project Benefits and Protection Measures*).

7 Project Benefits and Protection Measures

Project Benefits

This project will significantly expand habitat and improve habitat quality for common native plant and wildlife species. Daylighting the creek will restore natural hydrological function to the surface. The removal of hardscape and ornamental and non-native plant species, and establishment of an array of native species, will greatly increase native plant cover and diversity on the site. Approximately 230 native trees and 115 willows and other large shrubs, will be planted in the restored area, as well as additional shrubs, perennials, and grasses. Revegetation

along the restored creek is expected to increase wildlife species abundance and usage in the area by reconnecting fragmented habitat, providing new food and shelter resources, and providing sheltered access to water and shade. Riparian corridors in urban environments are critical movement pathways in an otherwise inhospitable landscape and support wildlife dispersal, genetic connectivity, and long-term population resilience in the face of climate-driven habitat shifts.

Protection Measures

The following measures will be implemented to avoid or minimize impacts to biological and aquatic resources during construction of the project. They apply to this project based on the project elements, project location, and the presence of California Species of Special Concern.

General Protection Measures During Construction

- Conduct a preconstruction training session for all construction staff by a Qualified Biologist. The training will include a discussion of the sensitive biological resources within the project site, special-status species' habitats, protection measures to ensure species are not impacted by project activities, project boundaries, biological conditions outlined in the project permits, and procedures to follow if sensitive wildlife species are found within the project site.
- A copy of all project permits will be on site at all times.
- A Qualified Biologist(s) will oversee the implementation of the protection measures.
- Excavated holes, trenches, etc. greater than one foot in depth will be covered with boards or other appropriate materials, or backfilled with dirt, at the end of each working day. If trenches remain open overnight, provide earthen escape ramps at appropriate intervals or slope banks at 1:1. Any animals discovered will be allowed to escape voluntarily.
- Vehicle traffic will be restricted to the designated work and staging areas.
- Erosion control (as shown on project plans) and other water quality Best Management Practices (BMPs) will be implemented to avoid sedimentation and disturbance to downstream aquatic habitats.
- Staging, access, and refueling must be located as specified on the design plans and work conducted at the staging area must follow all permit conditions.
- All food trash that may attract predators will be stored in a locked container and removed at the end of each construction day. Following construction, all trash and construction debris will be removed.

Native Nesting Bird and Special-status Bird Protection Measures

To avoid impacts on nesting native birds, the following protection measures will be implemented:

- Critical work will occur outside native nesting bird season: February 15 through August 15 to the extent feasible. If work needs to occur before August 15, a Qualified Biologist will complete a preconstruction breeding bird survey for the area of disturbance and a 200-foot buffer. The preconstruction surveys will be conducted within 5 days prior to initiation of vegetation clearing, grading, or other construction-related activities, including noise

disturbance. If the Qualified Biologist finds no active nesting or breeding activity, then work can proceed without restrictions.

- If active raptor or owl nests are identified within 100 feet of the construction area or active nests of other birds are identified within 50 feet of the construction area, a qualified biologist should determine whether construction activities may impact the active nest or disrupt reproductive behavior. If it is determined that construction would not affect an active nest or disrupt breeding behavior, construction can proceed without restrictions. The determination of disruption should be based on the species' sensitivity to disturbance (which can vary among species), the level of noise or construction disturbance, and the line of sight between the nest and the disturbance.
- If a qualified biologist determines that construction activities would likely disrupt breeding or nesting activities, then a no-disturbance buffer should be placed around the nesting location. A standard no-disturbance buffer distance is a 50-foot buffer for small songbirds and a 100-foot buffer for larger birds (e.g., raptors, owls); however, this can vary depending on bird species and other factors; the qualified biologist will make final determination on the no-disturbance buffer distance. Construction activities in the no disturbance buffers should be avoided until the nests have been vacated.
- If the site is left unattended for more than one week following the initial surveys, additional surveys should be completed. Ongoing construction monitoring should occur to ensure no nesting activity is disturbed. If state and/or federally listed birds are found breeding within the area, activities should be halted, and consultation with the CDFW and/or USFWS should occur to identify how to proceed.

Bat Protection

To avoid impacts on special-status and common bat species within the project site, the following protection measures will be implemented.

- Bat Tree Habitat Assessment and Surveys. Prior to any tree removal, a Qualified Biologist will conduct a habitat assessment for bats, unless otherwise approved in writing by CDFW. The habitat assessment will be conducted at least two weeks prior to tree removal and will include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). If suitable habitat trees are found, they will be flagged or otherwise clearly marked. Trees may be removed outside seasonal periods of bat activity (removal window: September 1 - October 15), or if: a) a Qualified Biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats, or b) presence of bats is presumed, or documented during the surveys described above, and removal using the two-step removal process detailed below occurs.

  Two-step tree removal will be conducted over two consecutive days as follows:

  1. The first day (in the afternoon), under direct supervision and instruction by a Qualified Biologist with experience conducting two-step tree removal, limbs and branches will be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices, or deep bark fissures will be avoided, and;
  2. The second day the entire tree will be removed.

Protection of Native Plants and Communities

The following protection measures will be implemented to minimize construction-related impacts of project construction on native vegetation:

- During preparation for construction, remove invasive species in all areas of disturbance, to the extent feasible. High priority target species are English ivy, French broom, cotoneaster, and fennel. Remove all plant parts with potential to germinate or resprout (e.g., stolons, rhizomes, rootstocks, seeds) for disposal off-site.
- Limit tree trimming to only the extent needed to accommodate construction activities. Conduct tree trimming under the supervision of a certified arborist.
- Minimize soil compaction and other soil disturbance by limiting disturbance to those areas shown on the design plans. During earthwork activities, ensure that soil layers are restored so that topsoil (i.e., available soil best suited to supporting plant growth) is retained as the uppermost layer.
- Limit compaction and disturbance within the root protection zone around existing trees to the extent possible. The root protection zone is defined as the ground within a radius one-third larger than the drip line, measured from the trunk (i.e., 1.5 times the diameter of the canopy, or at the dripline at a minimum). Where disturbance will occur within the root protection zone, place construction mats to prevent soil compaction and minimize the movement of heavy equipment in the root protection zone to the extent feasible.
- Protect native trees from incidental equipment damage to their trunk and limbs. Install tree wrap if equipment will come within 10 feet of mature native trees as shown on project plans.
- Prevent the introduction and spread of invasive plant species, which can be facilitated by soil disturbance and vehicle travel.
    - Any seed, straw, or mulch brought into the site will be selected from a source with low likelihood of containing weed seed and inspected by a restoration practitioner familiar with regional weed species and their seed before distribution on-site to ensure it is free of visible contamination.
    - Ensure that any vegetation/thatch removal from work areas does not spread seed of invasive plants (i.e. cotoneaster seed, or ivy stems)
    - To the extent feasible, remove any invasive plant species at the start of project construction.
    - Construction vehicles and other landscaping equipment will be cleaned of seed and soil before entering the site.

- Prevent the introduction and spread of plant pathogens. Procure nursery stock for restoration plantings from nurseries following current best management practices for the prevention of plant pathogen spread. Inspect stock at the point of purchase for symptoms of *Phytophthora* infection.

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Appendix A: Project Area Photographs

Current 20-ft section of daylighted Willow Creek, 180 ft south of the project area.

From the fire access road on the northwest side of the project area, looking northeast; ruderal herbaceous vegetation near a non-native forest patch.

Dense understory of non-native forest patch; French broom, Italian thistle, and Himalayan blackberry are visible.

A few native species, including live oak, are present scattered throughout the non-native forest patch.

The south end of campus (pre-2026 demolition); ruderal herbaceous vegetation is present in the foreground, with a few scattered ornamental trees.

Stand of Himalayan blackberry at the southernmost end of the project area.

Eucalyptus stand with dense English ivy understory.

Appendix B: Plant Species Observed

Latin Name	Common Name	Family - Latin Name	Introduced (I) / Highly Invasive (HI)
Acacia sp.	acacia	Fabaceae	I
Acacia melanoxylon	blackwood acacia	Fabaceae	I
Allium triquetrum	three cornered leek	Alliaceae	I
Arecaceae family	palm species	Arecaceae	I
Baccharis pilularis	coyote bush	Asteraceae	
Bromus diandrus	ripgut brome	Poaceae	I
Carduus pycnocephalus	Italian thistle	Asteraceae	I
Claytonia perfoliata	miner's lettuce	Montiaceae	
Conium maculatum	poison hemlock	Apiaceae	I
Cortaderia jubata	jubata grass	Poaceae	HI
Cortaderia selloana	Uruguayan pampas grass	Poaceae	HI
Cotoneaster sp.	cotoneaster	Rosaceae	I
Daucus carota	Queen Anne's lace	Apiaceae	I
Ehrharta erecta	upright veldt grass	Poaceae	I
Erigeron canadensis	horseweed	Asteraceae	
Eriobotrya japonica	loquat	Rosaceae	I
Erodium sp.	erodium species	Geraniaceae	varies
Eucalyptus sp.	eucalyptus	Myrtaceae	I
Foeniculum vulgare	fennel	Apiaceae	I
Galium aparine	cleavers	Rubiaceae	
Genista monspessulana	French broom	Fabaceae	HI
Geranium sp.	geranium species	Geraniaceae	varies
Hedera helix	English ivy	Araliaceae	HI
Helminthotheca echioides	bristly ox-tongue	Asteraceae	I
Hesperocyparis macrocarpa	Monterey cypress	Cupressaceae	I
Heteromeles arbutifolia	toyon	Rosaceae	
Lactuca virosa	bitter lettuce	Asteraceae	I
Leptospermum scoparium	broom tea-tree	Myrtaceae	I
Lonicera sp.	honeysuckle species	Caprifoliaceae	
Magnolia grandiflora	magnolia	Magnoliaceae	I
Malva sp.	mallow species	Malvaceae	varies
Marah fabacea	wild cucumber	Cucurbitaceae	
Medicago polymorpha	bur clover	Fabaceae	I
Olea sp.	olive species	Oleaceae	I
Oxalis pes-caprae	Bermuda buttercup	Oxalidaceae	I
Pinus sp.	pine species	Pinaceae	varies

Pittosporum undulatum	Victorian box	Pittosporaceae	I
Plantago lanceolata	English plantain	Plantaginaceae	I
Prunus sp.	ornamental plum species	Rosaceae	I
Pyrus sp.	pear species	Rosaceae	I
Quercus agrifolia	coast live oak	Fagaceae	
Raphanus sativus	wild radish	Brassicaceae	I
Rubus armeniacus	Himalayan blackberry	Rosaceae	HI
Rumex acetosella	sheep sorrel	Polygonaceae	I
Scrophularia californica	bee plant	Scrophulariaceae	
Solanum sp.	nightshade species	Solanaceae	varies
Sonchus sp.	sowthistle species	Asteraceae	I
Toxicodendron diversilobum	poison oak	Anacardiaceae	
Trifolium sp.	clover species	Fabaceae	varies
Umbellularia californica	California bay	Lauraceae	
Vicia sativa	spring vetch	Fabaceae	I
Vinca major	periwinkle	Apocynaceae	I

Appendix C. Special-status Fish and Wildlife Evaluated for Potential to Occur

The following table lists the special-status animal species evaluated for potential occurrence within the project sites. Species that are known to occur in the region but are not included in the following table are considered not present at the site due to a lack of nearby CNDDB occurrences and/or no suitable habitat present in the project areas[7]. Birds of Conservation Concern that may occur in the project vicinity are not included in the following table; they will be protected as described in *Nesting Bird Protection*.

Species and Status[8] USFWS/CDFW	Habitat and Life History	Potential for Occurrence[9] within the Project Area & Potential Effects
Mammals		
Western red bat *Lasiurus blossevillii* --/SSC high priority species with the Western Bat Working Group	Occurs throughout California in forested and riparian habitat, typically along edges, fields, and urban areas. A solitary bat, coming together only during mating and migration. A foliage dwelling species – roosting in leaves of trees and leaf litter in winter. Prefers densely foliated trees and has been documented in cottonwoods, velvet ash, box elder, amd mulberry (Anderson & Geluso 2018). Rarely enters buildings. Mates in flight during August and September. One to four pups born in late spring through early fall. Feeds on moths, crickets, beetles, and cicadas. Common amongst its range in the western U.S.	**Moderate potential to occur.** Project area is within species range and contains suitable roosting habitat (non-native forest patches). Nearest documented occurrence is approximately 4 miles northwest of the project area, in Muir Woods (2014; iNaturalist 2026). **With protection measures, no impacts to this species are expected.**

[7] This includes the American badger (*Taxidea taxus*, --/SSC), Bank swallow (*Riparia riparia*, --/ST), Burrowing owl (*Athene cunicularia*, --/Candidate SE), California black rail (*Laterallus jamaicensis coturniculus*, --/ST and FP), California giant salamander (*Dicamptodon ensatus*, --/SSC), California least tern (*Sternula antillarum browni*, FE/SE and FP), California red-legged frog (*Rana draytonii*, FT/SSC), California Ridgway's rail (*Rallus obsoletus obsoletus*, FE/SE and FP), Coho salmon – central California coast ESU (*Oncorhynchus kisutch pop. 4*, FE/SE), Double-crested cormorant (*Nannopterum auritum*, --/WL), Foothill yellow-legged frog – north coast DPS (*Rana boylii pop. 1*, --/SSC), green sea turtle (Chelonia mydas, FT/--), Longfin smelt – San Francisco Bay-Delta DPS (*Spirinchus thaleichthys pop. 2*, FE/ST), Mission blue butterfly (*Icaricia icarioides missionensis*, FE/--), Northwestern pond turtle (*Actinemys marmorata*, FPT/SSC), Green sturgeon – southern DPS (Acipenser medirostris), Saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*, --/SSC), Salt-marsh harvest mouse (*Reithrodontomys raviventris*, FE/SE and FP), San Pablo song sparrow (*Melospiza melodia samuelis*, --/SSC), Tidewater goby (*Eucyclogobius newberryi*, FE/SSC), green sea turtle (*Chelonia mydas*, FT/--), Townsend's big-eared bat (*Corynorhinus townsendii*, --/SSC), Western snowy plover (*Charadrius alexandrinus nivosus*, FT/SSC), Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*, FT/SE).

[8] Listing Status: FE-federally listed as endangered, FT-federally listed as threatened, FC-candidate for federal listing, BCC-Bird of Conservation Concern, SE-state listed as endangered, ST-state listed as threatened, Candidate SE-state candidate to be listed as endangered under CESA Candidate ST-state candidate to be listed as threatened under CESA, FP-State of California fully-protected species, SSC-California Species of Special Concern, and WL-Watch List.

[9] See *Special-status Species Evaluation Criteria.*

Species and Status[8] USFWS/CDFW	Habitat and Life History	Potential for Occurrence[9] within the Project Area & Potential Effects
Invertebrates		
Monarch butterfly – California overwintering population *Danaus plexippus plexippus pop. 1* FC/--	Winters in coastal California where it utilizes wind-protected tree groves (e.g., eucalyptus, Monterey pine and cypress) along the coast. Roost sites typically located close to nectar and water sources.	**Not likely to occur.** Project area contains a stand of eucalyptus, however, it lacks nectar sources and more preferable overwintering habitat is present to the south of campus - a stand of eucalyptus trees with a nearby water source (30 feet of Willow Creek in an open culvert 180 feet south of the project area). The project area is also located 0.5 miles northwest of monarch overwintering area (Areas of Conservation Emphasis – ACE); it is more likely that monarchs will be present in these areas they have shown preference for previously. The closest known occurrence is 0.4 miles east of the project area along the coast (2023 & 2024; iNaturalist 2026) and 1 mile west of the project area (1999; CDFW 2026a). It is possible monarchs may pass through the project area on their way to preferable overwintering habitat; Since this species is highly mobile, no impacts from construction are expected. **No permanent impacts to this species.**
western bumble bee *Bombus occidentalis* --/SE	This medium-sized social bee occurs in varied habitat. Most common nesting habitat includes grasslands, agricultural lands, and forests or forest edges. Nests underground, primarily in abandoned rodent burrows or cavities and sometimes in above-ground locations (logs, etc.) Nest entrances usually found on flat ground with duff or leaf litter within 1 m, and downed woody debris within 10 m. Bees will often forage 100m or more from a nest. Mate in fall, queens overwinter in ground then in spring they emerge and find an appropriate nest site for the colony. Multiple broods laid over the course of the summer.	**Not likely to occur.** Outside species' current known range but within historical range and contains suitable habitat (forested edge with downed debris and duff). Only historic reported occurrences nearby (two occurrences approximately 1.5 miles south of project area; 1963; CDFW 2026a). No impacts will occur to this species. **No permanent impacts to this species.**

Additional Birds of Conservation Concern (BCC) and other protected species are reported to be likely to occur in the project vicinity (USFWS 2026):

Allen's hummingbird
bald eagle
Belding's savannah sparrow
black oystercatcher
black swift
black turnstone
Brandt's cormorant
Bullock's oriole
California gull
California spotted owl
Clark's grebe

common yellowthroat
elegant tern
golden eagle
Heermann's gull
marbled godwit
northern harrier
Nuttall's woodpecker
oak titmouse
olive-sided flycatcher
red knot
Santa Barbara song sparrow
short-billed dowitcher
tricolored blackbird
western grebe
western gull