

**Appendix D:
Biological Resources Supporting Information**

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D.1 - Biological Resources Report

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March 18, 2019

USA Properties Fund, Inc.
3200 Douglas Blvd., Suite 200
Roseville, California 95661
Attention: Mr. Royce Patch

**RE: Biological Resources Constraints Analysis
2150 W College Avenue Project Site
Santa Rosa, California
APN: 010-320-029**

Dear Ms. Patch:

1. INTRODUCTION

Monk & Associates, Inc. (M&A) completed a cursory biological resources constraints analysis for the College Avenue Project Site (the project site) located in Santa Rosa, California (Figures 1 and 2). The purpose of this analysis is to provide a description of existing biological resources within the project site, and to identify potential biological constraints to any proposed development. This report also discusses selected laws and regulations that protect sensitive biological resources known from the region of the project site. This analysis is based on the Concept Site Plan for the West College Apartments project prepared by LPAS Architecture + Design (Attachment A). A total of 168 units are proposed, with a children's play area and pool, on the approximately 5.8-acre project development envelope of the 7.46 acres of the total project site area.

If in the future you decide to submit a project application to the City of Santa Rosa for a development project on this project site, M&A would be happy to provide you with a more detailed biological constraints analysis that the City could include in their formal California Environmental Quality Act (CEQA) review (for example, a Mitigated Negative Declaration). M&A's analysis at that time would identify potential project impacts to biological resources from the proposed project and prescribe mitigation measures that would reduce each impact to a "less than significant" level pursuant to the CEQA.

2. SETTING/PROJECT SITE DESCRIPTION

The project site is located in a densely developed area of Santa Rosa. West College Avenue forms the northern project site boundary and residential development occurs north of West College Avenue. CAL FIRE (California Department of Forestry and Fire Protection) offices are located immediately west/adjacent to the project site. Immediately south-southeast and east of the project site is a multi-use trail that runs along College Creek. Beyond this creek, at a slightly higher elevation are sewage disposal fields and commercial development. Additional commercial development occurs southeast and east of the project site.

The project site housed the former Sonoma County Water Agency office buildings; three vacant buildings, a garage, access driveways and associated parking areas occupy the 5.8-acre project site. There is a fenced easement area along the eastern and southern project site boundaries that is characterized by the public access College Creek Trail and a mature riparian corridor along College Creek. Figures 2 and 3 provide aerial photographs of the project site and illustrate the land use surrounding the project site.

3. ANALYSIS METHODS

Prior to preparing this biological resource analysis, M&A researched the most recent version of the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database (RareFind 5 application)¹ for historic and recent records of special-status (that is, threatened, endangered, rare) plant and animal species in the project region. Figure 4 is a graphical representation of the CNDDDB records of special-status species known to occur within 3 miles of the project site.

On March 1, 2019, M&A biologists, Ms. Sarah Lynch and Ms. Hope Kingma walked the entire project site to characterize it; to document plant and animal species and to look for areas that could be regulated as "waters of the United States/State." The survey involved searching all habitats on the site and recording all plant and wildlife species observed. M&A cross-referenced the habitats found on the project site against the habitat requirements of local or regionally known special-status species to determine if the proposed project could directly or indirectly impact such species. The results of our literature research and field analysis are provided below.

4. PROJECT SITE ANALYSIS

4.1 Plant Communities and Associated Wildlife Habitats

The project site is mostly developed and does not support any natural areas or any plant communities that are contiguous with offsite habitats. Rather it supports two human-influenced plant communities: ruderal (weedy) herbaceous habitat and anthropogenic (i.e., human-altered). A list of plants identified on the project site on March 1, 2019 is provided in Table 1, and a list of wildlife species observed on the project site is provided in Table 2. Below we describe the plant communities found on the project site.

4.1.1 RUDERAL HERBACEOUS HABITAT

This project site is dominated by ruderal herbaceous habitat. Ruderal (weedy) communities are assemblages of plants that thrive in waste areas, intensively maintained urban and agrarian landscapes and other sites that have been disturbed by human activity. Ruderal herbaceous species are often associated with areas where undesirable or competitive vegetation is frequently suppressed by mowing, disking, and/or spraying during the growing season.

¹ CNDDDB (California Natural Diversity Data Base). 2019. RareFind 5. Computer printout for special-status species within a 3-mile radius of the project site. California Natural Heritage Division, California Department of Fish and Game, Sacramento, CA.

On the project site, this habitat occurs in the open areas around the vacant buildings. Dominant grass and forb species within this habitat include ripgut grass (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), Bermuda grass (*Cynodon dactylon*), bristly ox tongue (*Helminthotheca echinoides*), cut-leaf geranium (*Geranium dissectum*), common groundsel (*Senecio vulgaris*), California burclover (*Medicago polymorpha*), common chickweed (*Stellaria media*), common vetch (*Vicia sativa*), poison hemlock (*Conium maculatum*), and Italian thistle (*Carduus pycnocephalus pycnocephalus*), all non-native species.

Typically, ruderal communities provide habitat for those animal species adapted to humans. Examples of animals associated with these communities include Virginia opossum (*Didelphis virginiana*), house mouse (*Mus musculus*), house finch (*Haemorhous mexicanus*), American robin (*Turdus migratorius*), California towhee (*Pipilo crissalis*), golden-crowned sparrow (*Zonotrichia atricapilla*), and house sparrow (*Passer domesticus*).

4.1.2 ANTHROPOGENIC COMMUNITIES

Communities dominated by plants introduced by people and established or maintained by human disturbance are “anthropogenic communities.” Some of these are entirely artificial communities such as cultivated row crops, lawns, vineyards, etc. Others are assemblages of weedy species that have invaded disturbed areas, sometimes in spite of human efforts to control them (Holland and Keil 1989²). Often around residential developments, plant species that are not native to the region have been introduced and later become naturalized, often spreading aggressively and reducing local species diversity. In these areas, it is not uncommon to find mixtures of non-native and native vegetation in open areas. The areas surrounding the former office buildings on the property have been planted with many landscape species and support many ornamental plant species such as English ivy (*Hedera helix*), Himalayan blackberry (*Rubus armeniacus*), iris (*Iris* sp.), Chinese fringe flower (*Loropetalum chinense*), star jasmine (*Trachelospermum jasminoides*), Lilly-of-the-Nile (*Agapanthus orientalis*), and oleander (*Nerium oleander*).

Ornamental trees planted in this area include species such as London planetree (*Platanus acerifolia*), privet (*Ligustrum* sp.), blue gum (*Eucalyptus globulus*) and black wattle (*Acacia mearnsii*). In addition to the non-native ornamentals, various native trees were planted onsite as part of the landscaping, such as redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia agrifolia*), and valley oak (*Quercus lobata*).

Anthropogenic communities also typically provide suitable environments for common animals that are adapted to living in association with humans. Common wildlife species observed using the anthropogenic community onsite included American crow (*Corvus brachyrhynchos*), black phoebe (*Sayornis nigricans*), California scrub jay (*Aphelocoma californica*), mourning dove (*Zenaida macroura*), bushtit (*Psaltriparus minimus*), oak titmouse (*Baeolophus inornatus*), ruby-crowned kinglet (*Regulus calendula*), and yellow-rumped warbler (*Setophaga coronata*). Red-shouldered hawk (*Buteo lineatus*) was observed in the mature valley oaks growing along College Creek immediately adjacent to the project site.

² Holland, V.L. & D.J. Keil. 1989. California vegetation. Biological Sciences Department/ California Polytechnic State University. San Luis Obispo, California.

5. SPECIAL-STATUS SPECIES

Special-status species are those plants and animals that are listed under the State and Federal Endangered Species Acts or that meet the definition of “endangered, rare, or threatened” under the California Environmental Quality Act (CEQA) (14 CCR §15380), that may include species not found on either State or Federal Endangered Species lists. Prior to site development it is necessary to address what special-status plant and animal species could be found in the project site vicinity and possibly on the project site. Special-status species known from the region of the project site are addressed below.

5.1 Potential Special-Status Plant Species on the Project Site

Figure 4 provides a graphical illustration of the known records for special-status plant species within 3 miles of the project site and helps readers visually understand the number of sensitive species that occur near the project site. **No special-status plants have been mapped on the project site.** However, according to the CDFW’s CNDDDB, a total of eleven (11) special-status plant species are known to occur in the region of the project site (Table 3). The project site is an abandoned, developed commercial site. It has paved and graveled parking lots and buildings covering the property. There are no native, naturalized or sensitive plant communities onsite that could provide habitat for special-status plant species. **Thus, M&A believes it highly unlikely that special-status plants would occur on this project site.**

Furthermore, there are no “suitable habitats” for special-status plants onsite (for example, no seasonal wetlands, no vernal pools, no mesic grasslands). **Therefore, no impacts to the federally-listed plant species would occur from project site redevelopment and mitigation should not be required for impacts to “suitable vernal pool habitats”** pursuant to the USFWS *Santa Rosa Plain Programmatic Biological Opinion* (USFWS 2007)³ or the *Recovery Plan for the Santa Rosa Plain* (USFWS 2016)⁴.

5.2 Special-Status Animals

Special-status species known from the vicinity of the project site include the federally and state listed California tiger salamander (*Ambystoma californiense*) and California “species of special concern,” western pond turtle (*Emys marmorata*) (see Figure 4 and Table 4), which are further discussed below. We also discuss pallid bat (*Antrozous pallidus*), a California “species of special concern,” below.

³ U.S. Fish and Wildlife Service (USFWS). 2007. Programmatic Biological Opinion (Programmatic) for U.S. Army Corps of Engineers (Corps) Permitted Projects that Affect the California Tiger Salamander and Three Endangered Plant Species on the Santa Rosa Plain, California (Corps File No. 223420N). November 9, 2007. 41 pp. w/ Enclosures.

⁴ USFWS (U.S. Fish and Wildlife Service). 2016. Recovery Plan for the Santa Rosa Plain: *Blennosperma bakeri* (Sonoma sunshine); *Lasthenia burkei* (Burke’s goldfields); *Limnanthes vinculans* (Sebastopol meadowfoam); California Tiger Salamander Sonoma County Distinct Population Segment (*Ambystoma californiense*). U.S. Fish and Wildlife Service, Pacific Southwest Region, Sacramento, California. vi + 128 pp. June 20, 2016. Federal Register. Pages: 39945-39946.

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5.2.1 CALIFORNIA TIGER SALAMANDER

The project site is located within the known range of the Sonoma County “Distinct Population Segment” (DPS) of California tiger salamander (CTS). Under the Federal Endangered Species Act (FESA), the USFWS emergency listed the Sonoma County DPS as endangered on July 22, 2002. The USFWS formalized the listing of the Sonoma County DPS of CTS as endangered on March 19, 2003 (USFWS 2003)⁵. In 2011, the USFWS designated revised critical habitat for the Sonoma County DPS of CTS. In total, approximately 47,383 acres (19,175 hectares) of land were designated as Critical Habitat for the Sonoma County DPS of CTS under the revised Final Rule (USFWS 2011)⁶. ***The project site is not located within this mapped critical habitat*** (Figure 8). On March 4, 2010, CTS was also State-listed as a threatened species under the California Endangered Species Act (CESA). Proposed projects may not impact CTS without incidental take authority from both the USFWS and the CDFW. Prior to implementing a project that would result in “take” (i.e., to harm, harass, or kill) of CTS, the USFWS must prepare an incidental take permit pursuant to either Section 7 or Section 10 of the FESA. Similarly, projects that impact CTS also require incidental take authority from the CDFW pursuant to the CESA.

M&A biologists have worked with the CTS in the Santa Rosa Plain for almost 30 years. We carry both State and Federal permits that allow us to work directly with the CTS. **We do not believe the project site supports breeding or over-summering CTS habitat.** The project site is an abandoned, developed commercial site. It has paved and graveled parking lots and buildings covering the property. There are no native, naturalized or suitable plant communities onsite that potentially provide habitat for CTS. **Per the USFWS’ *Recovery Plan for the Santa Rosa Plain (USFWS 2016)*,² the project site is not located within “Core” CTS Habitat (Figure 9). There is no expectation for take of CTS, and therefore no mitigation should be required for this species.**

5.2.2 WESTERN POND TURTLE

The western pond turtle is a California “species of special concern.” In April of 2015, the USFWS issued a 90-day finding on a petition to list this species under FESA. In September 2016, M&A spoke with USFWS’ Sacramento Field Office and was told that they “hope to finish a 12-month finding in the fiscal year of 2021” (G. Tarr, USFWS, Sacramento Field Office, pers. comm. with S. Lynch of M&A, September 21, 2016). Until the western pond turtle is formally listed it is not afforded the protections of FESA.

The western pond turtle is a habitat generalist, inhabiting a wide range of fresh and brackish, permanent and intermittent water bodies from sea level to about 4,500 feet above sea level

⁵ USFWS (U.S. Fish & Wildlife Service). 2003. Sonoma County population of California tiger salamander listed as an endangered species. Federal Register: March 19, 2003 (Volume 68, Number 53), Rules and Regulations, Page 13497-13520. From the Federal Register online via GPO Access [wais.access.gpo.gov]

⁶ USFWS (U.S. Fish & Wildlife Service). 2011. Endangered and Threatened Wildlife and Plants: Revised Designation of Critical Habitat for the Sonoma County Distinct Population Segment of California Tiger Salamander; Final Rule. Federal Register 50 CFR Part 17 August 31, 2011 (Volume 76, Number 169) Page 54346.

(USFWS 1992). Typically, this species is found in ponds, marshes, ditches, streams, and rivers that have rocky or muddy bottoms. This turtle is most often found in aquatic environments with plant communities dominated by watercress, cattail, and other aquatic vegetation. It is a truly aquatic turtle that usually only leaves the aquatic site to reproduce and to overwinter. Recent field work has demonstrated that western pond turtles may overwinter on land or in water or may remain active in water during the winter season; this pattern may vary considerably with latitude, water temperature, and habitat type and remains poorly understood (Jennings and Hayes 1994).

The pond turtle also requires upland areas for burrowing habitat where it digs nests and buries its eggs. These nests can extend from 52 feet to 1,219 feet from watercourses (Jennings and Hayes 1992), however most pond turtles nest in uplands within 250 meters of water (Bury, unpublished). Upland nest sites are usually found in areas with sparse vegetation. Sunny, barren, and undisturbed (not disked) land provides optimal habitat, while shady riparian habitat and planted agricultural fields do not provide suitable habitat (op. cit.). Eggs are typically laid from March to August (Zeiner et. al. 1988), with most eggs being laid in May and June. Hatchlings will stay in the nest until the following April (Bury, unpublished). Predators of juvenile pond turtles include the non-native bullfrog (*Rana catesbeiana*) and Centrarchid fish (sunfish). This turtle is most visible between April and July when it can be observed basking in the sun. In areas where the water is very warm during these months, however, it will bask in the warm water and will be more difficult to observe. It eats plants, insects, worms, fish and carrion (Stebbins 2003).

The closest record for western pond turtle is located approximately 0.7 mile northwest of the project site (CNDDDB Occurrence No. 582). This 2003 is located in an unnamed Flood Control Channel. College Creek provides suitable habitat for western pond turtles, and the banks along the College Creek adjacent to the project site provide suitable western pond turtle nesting habitat; however, the highly disturbed uplands of the project site do not provide suitable nesting habitat. Furthermore, the chain-link fence that surrounds the project site precludes this species from entering the site. Finally, the silt fencing proposed as part of the project will prevent any western pond turtles residing in College Creek or on its banks from entering the project construction zone. *As such, the proposed project will not result in impacts to the western pond turtle.*

5.2.3 PALLID BAT

The pallid bat is a California “species of special concern.” It has no federal status. This bat is a locally common species of low elevations in California. It occurs throughout California except for the high Sierra Nevada from Shasta to Kern Counties, and the northwestern corner of the state from Del Norte and western Siskiyou counties to northern Mendocino County. While it occurs in a wide variety of habitats, it is most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures, and as such, typical day roosts occur in caves, crevices, mines, and occasionally in hollow trees and buildings. Night roosts may be in more open sites such as porches and open buildings. The pallid bat is a social species, roosting in groups of 20 or more.

There are several trees with crevices on the project site that provide potential roosting habitat for this special-status bat, and pallid bats could also roost in the abandoned buildings on the project

site. In order to avoid impacts to special-status bats, a biologist should conduct a preconstruction survey of trees and buildings that would be impacted by the project 15 days prior to removal or commencement of ground work. All bat surveys should be conducted by a biologist with experience surveying for bats. If no special-status bats are found during the surveys, then there would be no further regard for special-status bat species.

If special-status bat species are found roosting on the project site, the biologist should determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree or building that will be impacted by the project, such impacts should be avoided until the young are flying and feeding on their own. A non-disturbance buffer installed with orange construction fencing should also be established around the maternity site. The size of the buffer zone should be determined by a qualified bat biologist at the time of the surveys. If adults are found roosting in a tree or building on the project site but no maternal sites are found, then the adult bats can be flushed or a one-way eviction door can be placed over the tree cavity (or building access opening) for a 48-hour period prior to the time the tree or building in question would be removed or disturbed. At that point, no other mitigation compensation would be required. *Implementation of these mitigation measures would ensure that impacts to bats remain at a level considered less than significant pursuant to the CEQA.*

There are no other special-status species concerns relating to this project site.

6. REGULATORY PROTECTIONS IN PLACE FOR NESTING BIRDS

The existing buildings, trees and landscape vegetation provide suitable nesting substrate for birds. Nesting birds are protected under several federal and state regulations which are discussed below.

6.1 Federal Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (16 U.S.C. §§ 703-712, July 3, 1918, as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986 and 1989) makes it unlawful to “take” (kill, harm, harass, shoot, etc.) any migratory bird listed in Title 50 of the Code of Federal Regulations, Section 10.13, including their nests, eggs, or young. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, wading birds, seabirds, and passerine birds (such as warblers, flycatchers, swallows, etc.).

Birds of prey such as the white-tailed kite (*Elanus leucurus*), Coppers hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), and red-shouldered hawk, could nest on or immediately adjacent to the project site. Similarly, many common passerine bird species could nest on or immediately adjacent to the project site. All raptors (birds of prey) are subject to the Migratory Bird Treaty Act. Also, common songbirds and wading birds are also protected pursuant to this Act.

Preconstruction nesting surveys would have to be conducted for nesting birds to ensure that there is no direct take of these birds, including their eggs or young, during redevelopment of the project site. proposed project. As long as there is no direct mortality to species protected

pursuant to this Act caused by development of the site, there should be no constraints to development of the site. While adult birds can typically fly out of harm's way, nesting birds, their eggs, and young are more prone to being impacted by construction projects.

To comply with the Migratory Bird Treaty Act, all active nest sites would have to be avoided while birds were nesting. If nesting raptors are identified during the surveys, the dripline of the nest tree must be fenced with orange construction fencing (provided the tree is on the project site), and a 300-foot radius around the nest tree must be staked with bright orange lath or other suitable staking. A smaller diameter protective buffer could be established if a qualified ornithologist monitors the nesting attempt and determines that the birds are well acclimated to disturbance. Upon completion of the nesting cycle, as determined by a qualified ornithologist, the protective buffer could be removed and the proposed project could commence as otherwise planned.

6.2 California Fish and Game Code § 3503, 3503.5, 3511, and 3513

California Fish and Game Code §3503, 3503.5, 3511, and 3513 prohibit the “take, possession, or destruction of birds, their nests or eggs.” Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered “take.” All raptors (that is, hawks, eagles, owls) their nests, eggs, and young are protected under California Fish and Game Code (§3503.5). Additionally, “fully protected” birds, such as the white-tailed kite, are protected under California Fish and Game Code (§3511). “Fully protected” birds may not be taken or possessed (that is, kept in captivity) at any time.

Raptors that are known to nest in the region of the project site include white-tailed kite, Cooper's hawk, red-tailed hawk, and red shouldered hawk, among others. These raptors and many common passerine birds could nest on the project site. Preconstruction nesting surveys would have to be conducted for nesting birds to ensure that there is no direct take of these birds, including their eggs or young, during the construction of the proposed project. Any active nests that are found during preconstruction surveys would have to be avoided by the proposed project. Suitable non-disturbance buffers would be established around nest sites until the nesting cycle is complete. The size of the non-disturbance buffer would have to be determined by a qualified ornithologist.

7. WATERS OF THE U.S. AND STATE (“OTHER WATERS” AND “WETLANDS”)

M&A did not conduct a formal wetland delineation on the project site using the U.S. Army Corps of Engineers' formal methods for identifying waters of the U.S. However, considering that the currently developed site is paved and/or graveled and does not support any natural waterways or drainage features, M&A does not believe that the project site supports any U.S. Army Corps of Engineers' (Corps) or Regional Water Quality Control Board (RWQCB) jurisdictional features that would be regulated pursuant to Section 404 and Section 401 of the Clean Water Act, respectively.

College Creek is located immediately adjacent to the project site. This creek flows into Santa Rosa Creek, which is a tributary of Laguna de Santa Rosa, which flows to the Russian River, a Traditional Navigable Water. Therefore, this creek would be subject to the Corps and RWQCB jurisdiction. In addition, Figure 10 shows several shallow ditches that occur along the boundaries of the project site. Since these ditches have direct hydrologic connectivity to College Creek, these ditches would also most likely be subject to Corps and RWQCB jurisdiction.

To avoid any impacts to these adjacent ditches, or to College Creek, M&A recommends installing silt fencing along the western, southern and eastern project site boundaries to prevent sedimentation and unintended de minimus fill impacts to the adjacent ditches and College Creek while construction is ongoing.

According to the project civil engineer, this project will likely be able to use the existing outfall(s) in College Creek and/or the storm drain system in College Avenue, to discharge treated stormwater from the development. Detention facilities will be constructed to meter the water out so that there is no net increase in overall site runoff as compared to the pre-project conditions. Therefore, it is expected that no permits from the Corps or RWQCB will be required for this project. If the project outfall structures would result in impacts to waters of the U.S./State, a permit would be required from both the Corps and RWQCB.

8. STATE WATER RESOURCES CONTROL BOARD (SWRCB)/RWQCB – STORM WATER MANAGEMENT

8.1 Construction General Permit

The Construction General Permit requires all dischargers where construction activity disturbs greater than one acre of land or those sites less than one acre that are part of a common plan of development or sale that disturbs more than one acre of land surface to:

1. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving off site into receiving waters.
2. Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation. Achieve quantitatively-defined (i.e., numeric) pollutant-specific discharge standards, and conduct much more rigorous monitoring based on the project's projected risk level.
3. Perform inspections of all BMPs.

This Construction General Permit is implemented and enforced by the nine California Regional Water Quality Control Boards (RWQCBs). It is also enforceable through citizens' suits and represents a dramatic shift in the State Water Board's approach to regulating new and redevelopment sites, imposing new affirmative duties and fixed standards on builders and developers.

Types of Construction Activity Covered by the Construction General Permit

- clearing,
- grading,
- disturbances to the ground such as stockpiling, or excavation that results in soil disturbances of at least one acre or more of total land area.

Construction activity that results in soil disturbances to a smaller area would still be subject to this General Permit if the construction activity is part of a larger common plan of development that encompasses greater than one acre of soil disturbance, or if there is significant water quality impairment resulting from the activity.

Construction activity does not include:

- routine maintenance to maintain original line and grade,
- hydraulic capacity, or original purpose of the facility,
- nor does it include emergency construction activities required to protect public health and safety.

The Construction General Permit includes several “post-construction” requirements. These requirements entail that site designs provide no net increase in overall site runoff and match pre-project hydrology by maintaining runoff volume and drainage concentrations. To achieve the required results where impervious surfaces such as roofs and paved surfaces are being increased, developers must implement non-structural off-setting BMPs, such as landform grading, site design BMPs, and distributed structural BMPs (bioretention cells, rain gardens, and rain cisterns). This “runoff reduction” approach is essentially a State Water Board-imposed regulatory requirement to implement Low Impact Development (“LID”) design features. Volume that cannot be addressed using non-structural BMPs must be captured in structural BMPs that are approved by the RWQCB.

Improving the quality of site runoff is necessary to improve water quality in impaired and threatened streams, rivers, and lakes (that is, water bodies on the EPA’s 303(d) list). The RWQCB prioritizes the water bodies on the 303(d) list according to potential impacts to beneficial uses. Beneficial uses can include a wide range of uses, such as nautical navigation; wildlife habitat; fish spawning and migration; commercial fishing, including shellfish harvesting; recreation, including swimming, surfing, fishing, boating, beachcombing, and more; water supply for domestic consumption or industrial processes; and groundwater recharge, among other uses. The State is required to develop action plans and establish Total Maximum Daily Loads (TMDLs) to improve water quality within these impaired water bodies. The TMDL is the quantity of a pollutant that can be safely assimilated by a water body without violating the applicable water quality standards.

Pursuant to the CWA, the RWQCB regulates construction discharges under the National Pollutant Discharge Elimination System (NPDES). The project sponsor of construction or other

activities that disturb more than 1 acre of land must obtain coverage under NPDES Construction General Permit Order 2009-0009-DWQ, administered by the RWQCB⁷.

8.1.1 APPLICABILITY TO THE PROPOSED PROJECT

To obtain coverage under the SWRCB administered Construction General Permit, the Applicant (typically through its civil engineer) must electronically file a number of permit-related compliance documents (Permit Registration Documents (PRDs), including a Notice of Intent (NOI), a risk assessment, site map, signed certification, Stormwater Pollution Prevention Plan (SWPPP), Notice of Termination (NOT), NAL exceedance reports, and other site-specific PRDs that may be required. The PRDs must be prepared by a Qualified SWPPP Practitioner (QSP) or Qualified SWPPP Developer (QSD) and filed by a Legally Responsible Person (LRP) on the RWQCB's Stormwater Multi-Application Report Tracking System (SMARTS). (QSDs are typically civil engineers, professional hydrologists, engineering geologists, or landscape architects.) Once filed, these documents become immediately available to the public for review and comment. At a minimum, the SWPPP shall identify Best Management Practices (BMPs) for implementation during project construction that are in accordance with the applicable guidance and procedures contained in the California Stormwater Quality Association's *California Stormwater Best Management Practices Handbook* (2015).

9. STANDARD URBAN STORM WATER MITIGATION PLAN (SUSMP)

The project site is within the boundaries of the Standard Urban Stormwater Management Plan (SUSMP). The SUSMP guidelines were created to comply with the municipal storm water NPDES permit requirements enforced by the SWRCB and the RWQCB. The SUSMP guidelines were developed to assist project sponsors and municipal staff to implement the SUSMP requirements adopted by the North Coast Regional Water Quality Control Board. Since the SUSMP requirements apply to both privately sponsored projects and public capital improvement projects, these Guidelines are required to be used by development project Applicants, municipal development project review staff, and municipal staff responsible for capital improvement projects. The SUSMP requirements ensure that projects otherwise meet Storm Water Management Plan requirements enforceable pursuant to the National Pollutant Discharge Elimination System (NPDES) C3 requirements.

The SUSMP goals for new and redevelopment projects are to manage, as close to the point of origin as possible, 1) storm water quality, 2) storm water quantity, and 3) to conserve natural areas of the development site. These three goals are described further below. It should be noted that the concept of "maximum extent practical" (MEP) applies to each of the goals. The MEP requirement is a technology-based standard established by Congress in the Clean Water Act U.S.C. S 1342 (p)(3)(B)(iii) that municipal dischargers of storm water must meet. To achieve the maximum extent practicable standard, municipalities must employ whatever Best Management

⁷ CGP Order 2009-0009-DWQ remains in effect, but has been amended by CGP Order 2009-0014-DWQ, effective February 14, 2011, and CGP Order 2009-0016-DWQ, effective July 17, 2012. The first amendment merely provided additional clarification to Order 2009-0009-DWQ, while Order 2009-0016-DWQ eliminated numeric effluent limits on pH and turbidity (except in the case of active treatment systems), in response to a legal challenge to the original order.

Practices (BMPs) are technically feasible (i.e., are likely to be effective) and are not cost prohibitive. The major emphasis is on technical feasibility. Reducing pollutants to the maximum extent practicable means choosing effective BMPs, and rejecting applicable BMPs only where other effective BMPs will serve the same purpose, or the BMPs would not be technically feasible, or the cost would be prohibitive.

The SUSMP goals for new and redevelopment projects are as follows:

Storm Water Quality. The first goal is to prevent pollutants generated at development and redevelopment projects from reaching storm drains. Projects covered by the SUSMP must be designed to minimize the introduction of pollutants.

Storm Water Quantity. The second goal is to prevent increases in storm water runoff from the two-year 24 hour storm event for Sonoma County. SUSMP projects should incorporate best management practices to limit the post-development runoff to pre-development conditions to the MEP. Best management practices are methods used to minimize pollutants in storm water and the quantity of runoff. One of the objectives of these guidelines is to provide more specific information about how MEP will be achieved.

Conserve Natural Areas. The third goal is to conserve natural areas of a development site. This goal supports the other two goals by preserving areas where storm water runoff can be purified naturally by infiltration into the soil and flow over vegetated areas. SUSMP projects should strive to maximize the amount of land left in a natural, undisturbed condition, preserve riparian areas and wetlands, limit clearing of native vegetation, and maximize trees and vegetation.

This SUSMP applies to applicable projects that require a discretionary permit, including any ministerial permits that are based on the discretionary permit. Source controls will be recommended for all discretionary projects.

Projects that must comply with the SUSMP include:

- a) Development projects that create one acre (43,560 square feet) or more of new impervious surface. This category includes development of any type on public or private land, which falls under the planning and building authority of Sonoma County or City of Santa Rosa, where one acre or more of new impervious surface, collectively over the entire project site, will be created.
- b) Streets, roads, highways and freeways that create one acre (43,560 square feet) or more of new impervious surface. This category includes any newly constructed impervious surface used for the transportation of pedestrians, bicycles, and motorized vehicles.
- c) Redevelopment projects that are located on an already developed site and result in the addition of and/or reconstruction of one acre (43,560 square feet) or more of new impervious surface. Only the additional and/or reconstructed portion(s) of the site must be included in treatment design. Excluded from this category are interior remodels and routine maintenance or repair, including roof or exterior surface replacement and resurfacing.

- d) Development and redevelopment projects located directly adjacent to a natural waterway, modified natural waterway, or constructed channel or that requires a new storm drain outfall to such waterway, regardless of project size or impervious surface. This requirement is intended to protect environmentally sensitive areas. For redevelopment projects, excluded from this category are interior remodels and routine maintenance or repair, including roof or exterior surface replacement and resurfacing.

Regarding phased projects, new development or redevelopment activity that is part of a larger common plan of development that results in less than one acre of impervious surface must comply with SUSMP requirements. For example, if 50% of a subdivision is constructed and results in 0.9 acre of impervious surface and the remaining 50% of the subdivision is to be developed at a future date, the property owner must comply with SUSMP requirements.

9.1.1 SOURCE AND TREATMENT CONTROL REQUIREMENTS

Source control and treatment control BMPs are intended to reduce runoff and keep pollutants out of storm water throughout the life of the project. They may be described as post-construction BMPs or “post-development” control measures. Post-construction BMPs differ from construction BMPs, which are used during the construction phase to prevent erosion and keep construction-related pollutants from reaching storm water.

The SUSMP recognizes two types of post-development BMPs for storm water pollution control – source controls and treatment controls. Source controls include BMPs that are designed to prevent pollutants from reaching storm water runoff and minimize site runoff. Source controls include a large variety of BMPs that range from minimizing the amount of impervious surface used at a project site to specific pollution prevention BMPs such as providing a roof over waste storage areas. The municipal storm water NPDES permit characterizes source control as the first line of defense at a project site and storm water treatment as a backup or additional line of defense. Source controls will be recommended for all discretionary projects.

Storm water treatment controls are engineered systems that are designed to remove pollutants from storm water. The SUSMP and NPDES permit have specific hydraulic design criteria for sizing storm water treatment controls to assure that an optimum amount of storm water receives treatment. Examples of storm water treatment controls include vegetated swales, extended detention basins, and bioretention areas. These are described in more detail in Chapter 4.

Source and treatment controls require long-term maintenance to continue to function effectively and avoid the creation of nuisance conditions. The SUSMP requires the project Applicant to provide to the City or County a signed statement accepting responsibility for maintenance until the responsibility is legally transferred. The SUSMP further requires property owners to conduct maintenance inspection of all source and treatment control BMPs at least once a year or as specified by the designer or manufacturer.

9.1.2 POST-CONSTRUCTION SEDIMENT AND EROSION CONTROL

Sediment is an important pollutant of concern in the North Coast Region. During construction sediment and erosion control BMPs must be implemented in accordance with the Statewide Construction Activity NPDES General Permit and the City of Santa Rosa or County of Sonoma grading permit programs. The design of projects must also consider potential sedimentation and erosion issues during long-term project operations and incorporate appropriate sediment and erosion controls in the project design.

Source Controls includes the need to select and maintain vegetation in landscaped pervious areas to prevent runoff from contacting bare earth and conveying sediment into the storm drain system. Similarly, pervious paving materials must also be selected, designed and maintained to avoid sedimentation and erosion.

9.1.3 ENFORCEABILITY

The NPDES permit issued to the participating SUSMP entities requires these entities to control pollutant discharges to their respective storm drain systems. At a minimum, this legal authority empowers the participating entities to use enforcement mechanisms, including monetary fines, to require compliance by private entities within their jurisdictions. If a project Applicant fails to comply with the SUSMP requirements, the participating entities may determine that it is necessary to undertake enforcement actions, which may include a monetary fine.

9.1.4 APPLICABILITY TO THE PROPOSED PROJECT

The proposed project will affect greater than one acre and is therefore subject to the SUSMP. The City of Santa Rosa, through its RWQCB MS4 permit, will enforce compliance with the 2016 revised SUSMP. The Applicant's civil engineer shall develop a Storm Water Low Impact Development Plan (SW LID) that shows how the project will comply with the SUSMP. The SW LID will be submitted to the City of Santa Rosa for review and approval.

9.2 California Department of Fish and Wildlife Protections

9.2.1 SECTION 1602 OF CALIFORNIA FISH AND GAME CODE

Pursuant to Section 1602 of the California Fish and Game Code: "An entity may not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, unless all of the following occur:

- (1) CDFW receives written notification regarding the activity in the manner prescribed by CDFW. The notification shall include, but is not limited to, all of the following:
 - (A) A detailed description of the project's location and a map.
 - (B) The name, if any, of the river, stream, or lake affected.
 - (C) A detailed project description, including, but not limited to, construction plans and drawings, if applicable.

- (D) A copy of any document prepared pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code.
- (E) A copy of any other applicable local, state, or federal permit or agreement already issued.
- (F) Any other information required by CDFW” (Fish & Game Code 2014).

Please see Section 1602 of the current California Fish and Game Code for further details.

Please also note that while not stated in the regulations above, CDFW typically considers its jurisdiction to include riparian vegetation (that is, the trees and bushes growing along the stream). Thus, any proposed activity in a natural stream channel that would substantially adversely affect an existing fish and/or wildlife resource, including its riparian vegetation, would require entering into a Streambed Alteration Agreement (SBAA) with CDFW prior to commencing with work in the stream. However, prior to authorizing such permits, CDFW typically reviews an analysis of the expected biological impacts, any proposed mitigation plans that would be implemented to offset biological impacts and engineering and erosion control plans.

9.2.2 APPLICABILITY TO PROPOSED PROJECT

Any impacts to College Creek associated with any new or improvements to existing outfall structures would be subject to CDFW’s jurisdiction pursuant to Section 1602 of the California Fish and Game Code. A SBAA with the CDFW would be required for any proposed outfall structure that would be constructed as part of the proposed project.

10. RECOMMENDATIONS:

If you move forward with this project site, M&A makes the following recommendations:

- Preconstruction nesting surveys would have to be conducted for nesting birds to ensure that there is no direct take of these birds, including their eggs or young, during the construction of the proposed project. If project site disturbance associated with the proposed project would commence between March 1 and September 1, a preconstruction nesting survey should be completed in the 15-day period prior to commencing with any proposed project related disturbance on the project site. The nesting survey should be conducted on the project site and within a zone of influence around the project site. The zone of influence includes those areas off the project site where birds could be disturbed by earth-moving vibrations or noise. Accordingly, the nesting survey(s) must cover the project site and an area around the project site boundary.

If nesting raptors are identified during the surveys, the dripline of the nest tree must be fenced with orange construction fencing (provided the tree is on the project site), and a 300-foot radius around the nest tree must be staked with bright orange lath or other suitable staking. A smaller diameter protective buffer could be established if a qualified ornithologist monitors the nesting attempt and determines that the birds are well acclimated to disturbance. Upon completion of the nesting cycle, as determined by a

qualified ornithologist, the protective buffer could be removed and the proposed project could commence as otherwise planned.

If special-status birds are identified nesting on or adjacent to the project site, a non-disturbance buffer of 100 feet should be established or as otherwise prescribed by a qualified ornithologist. If common (that is, not special-status) birds for example, California towhee, California scrub jay, or acorn woodpeckers (*Melanerpes formicivorus*) are identified nesting on or adjacent to the project site, a non-disturbance buffer of 75 feet should be established or as otherwise prescribed by a qualified ornithologist. The buffer should be demarcated with painted orange lath or via the installation of orange construction fencing. Disturbance within the buffer should be postponed until it is determined by a qualified ornithologist that the young have fledged and have attained sufficient flight skills to leave the area or that the nesting cycle has otherwise completed.

Typically, most passerine birds in the region of the project site are expected to complete nesting by August 1. However, many species can complete nesting by the end of June or early to mid-July. Regardless, nesting buffers should be maintained until September 1 unless a qualified ornithologist determines that young have fledged and are independent of their nests at an earlier date.

- In order to avoid impacts to special-status bats, a biologist should conduct a preconstruction survey of trees that would be impacted by the project 15 days prior to removal or commencement of ground work. All bat surveys should be conducted by a biologist with experience surveying for bats. If no special-status bats are found during the surveys, then there would be no further regard for special-status bat species.

If special-status bat species are found roosting on the project site, the biologist should determine if there are young present (i.e., the biologist should determine if there are maternal roosts). If young are found roosting in any tree that will be impacted by the project, such impacts should be avoided until the young are flying and feeding on their own. A non-disturbance buffer installed with orange construction fencing should also be established around the maternity site. The size of the buffer zone should be determined by a qualified bat biologist at the time of the surveys. If adults are found roosting in a tree or building on the project site but no maternal sites are found, then the adult bats can be flushed or a one-way eviction door can be placed over the tree cavity (or building access opening) for a 48-hour period prior to the time the tree or building in question would be removed or disturbed. At that point, no other mitigation compensation would be required.

- Wildlife friendly hay wattles (that is, no monofilament netting on the wattles) and silt fence will need to be installed along the western, southern and eastern project site boundaries to prevent unintended de minimus fill impacts to the adjacent ditches and College Creek while construction is ongoing.
- The civil engineer must develop a Storm Water Low Impact Development Plan (SW LID) that shows how the project will comply with the SUSMP. The SW LID will be

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submitted to the City of Santa Rosa for review and approval. The City of Santa Rosa, through its RWQCB MS4 permit, will enforce compliance with the 2016 revised SUSMP.

- Any impacts to College Creek associated with any new or improvements to existing outfall structures would be subject to U.S. Army Corps of Engineers' (Corps) or Regional Water Quality Control Board (RWQCB) jurisdiction pursuant to Section 404 and Section 401 of the Clean Water Act, respectively, and CDFW's jurisdiction pursuant to Section 1602 of the California Fish and Game Code.

In the future, M&A's report, under a budget revision, could be modified into a formal California Environmental Quality Act (CEQA) Biology Report that could be submitted to the CEQA lead agency (City of Santa Rosa) with any formal project application.

This concludes M&A's "brief" Biological Constraints Analysis. Please call if you have any questions.

Sincerely,



Hope Kingma
Associate Biologist

Attachments: Figures 1-10
Tables 1 -4

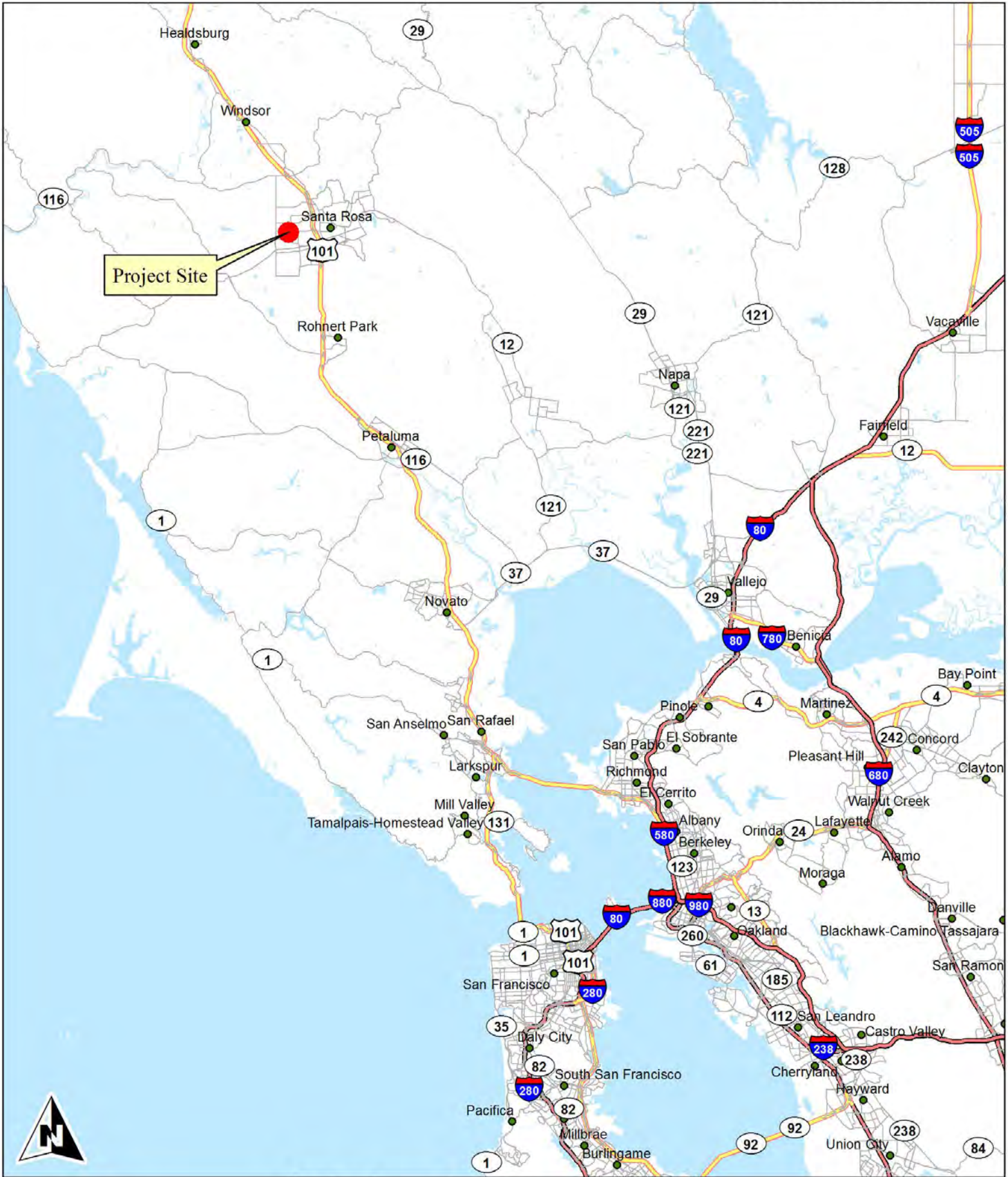
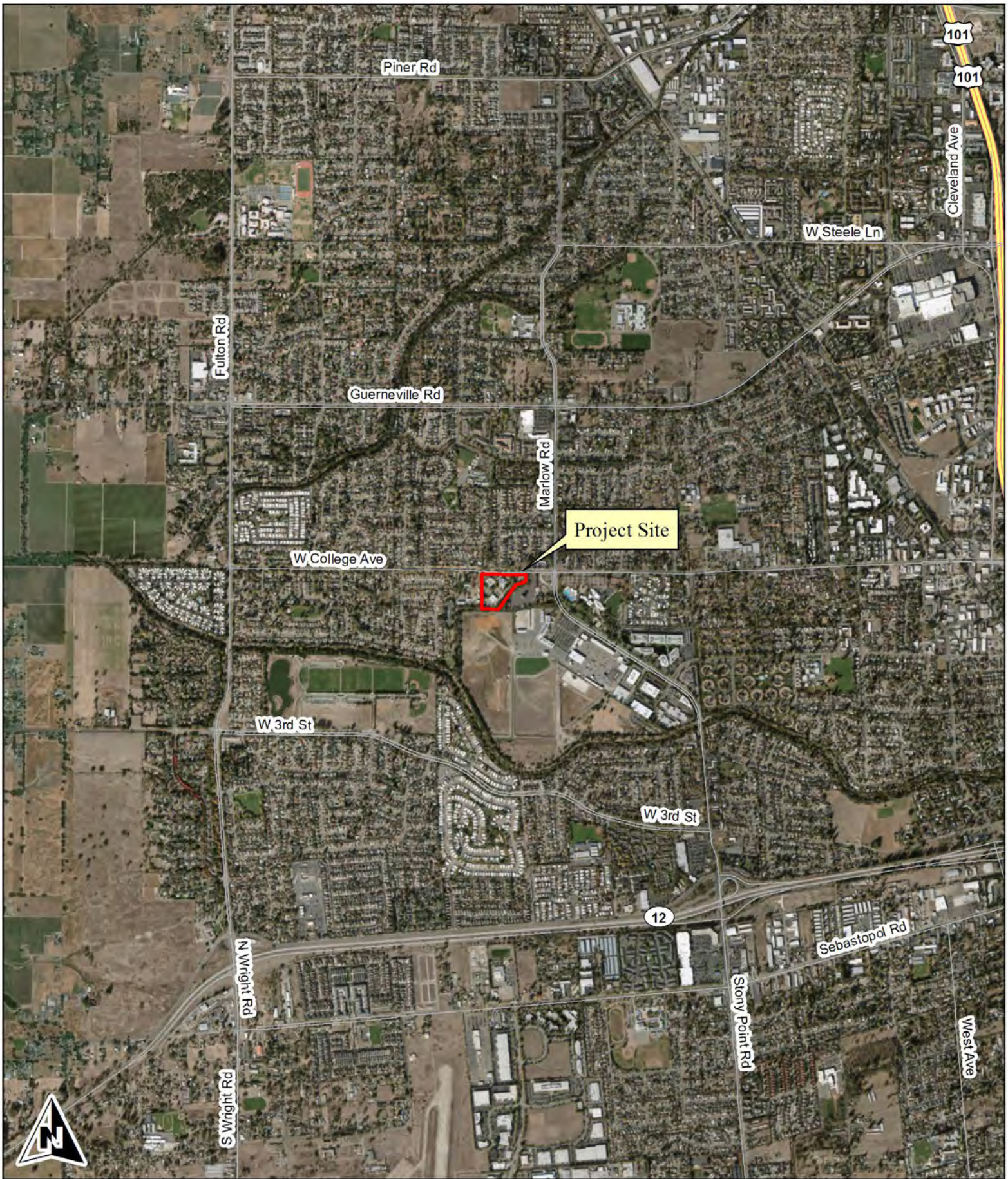


Figure 1. 2150 W College Avenue Project Site
Regional Map
Santa Rosa, California



Monk & Associates
Environmental Consultants
1136 Saranap Avenue, Suite Q
Walnut Creek, California 94595
(925) 947-4867

Figure 2. 2150 W College Avenue Project Site
Location Map
Santa Rosa, California

38.444453 -122.754541
Section: 21; T7N R8W
7.5-Minute Sebastopol quadrangle
Aerial Photograph Source: ESRI
Map Preparation Date: February 6, 2018

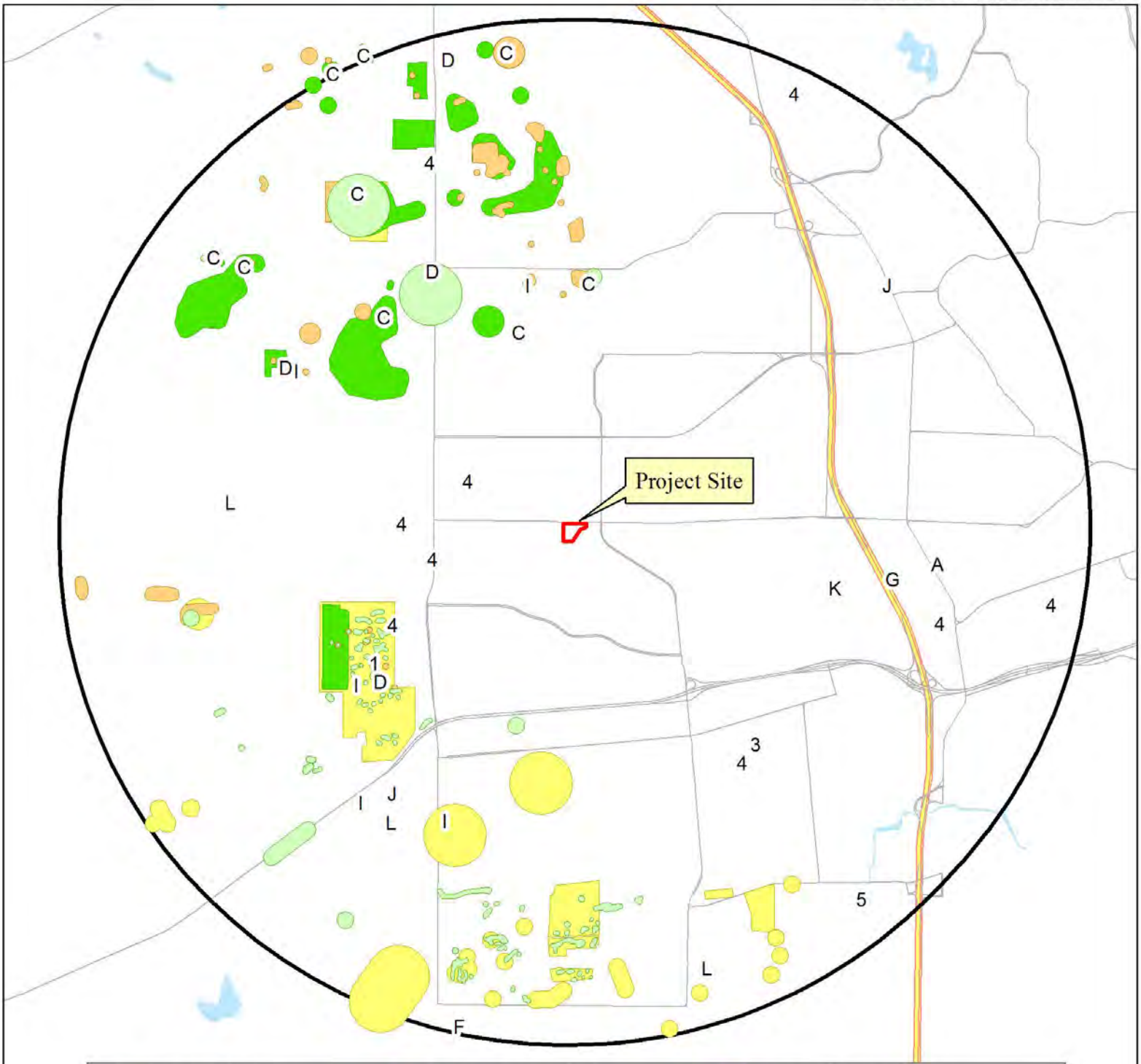


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0 25 50 100 150 200 250 Feet

Figure 3. Aerial Photograph of the
2150 W College Avenue Project Site
Santa Rosa, California

Aerial Photograph Source: ESRI
Map Preparation Date: March 18, 2018



1 American badger	Blennosperma bakeri	Limnanthes vincularis
California tiger salamander	C Downingia pusilla	I Navarretia leucocephala ssp. bakeri
3 Cooper's hawk	D Hemizonia congesta ssp. congesta	J Trifolium amoenum
4 Western pond turtle	Lasthenia burkei	K Trifolium buckwestiorum
5 White-tailed kite	F Legenere limosa	L Trifolium hydrophilum
A Amsinckia lunaris	G Leptosiphon jepsonii	



Figure 4. Known Special-Status CNDDDB Species Records Within 3 Miles of the 2150 W College Avenue Project Site

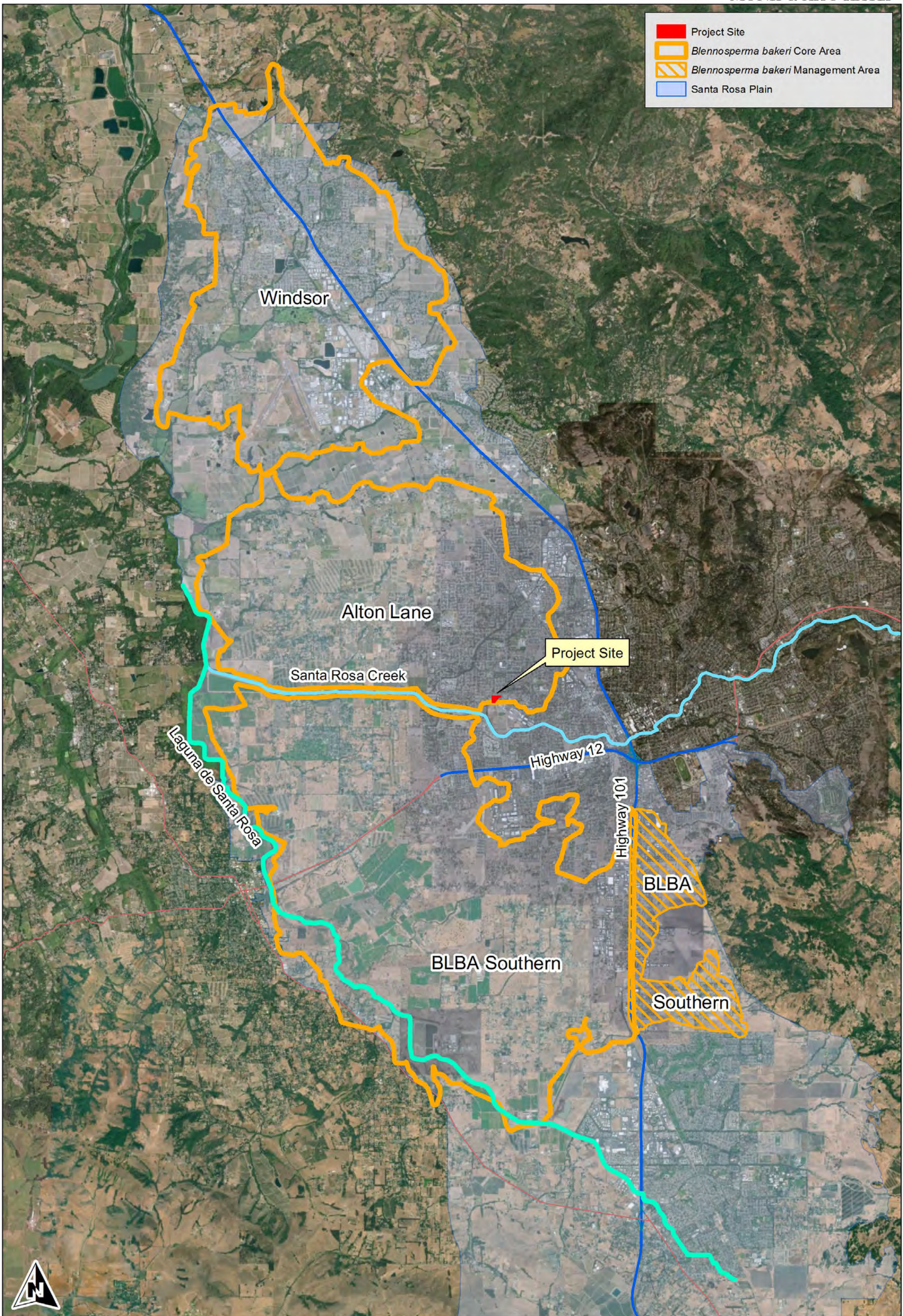


Figure 5. *Blennosperma bakeri* Core and Management Areas (from USFWS 2016) in the Vicinity of the 2150 W College Avenue Project Site

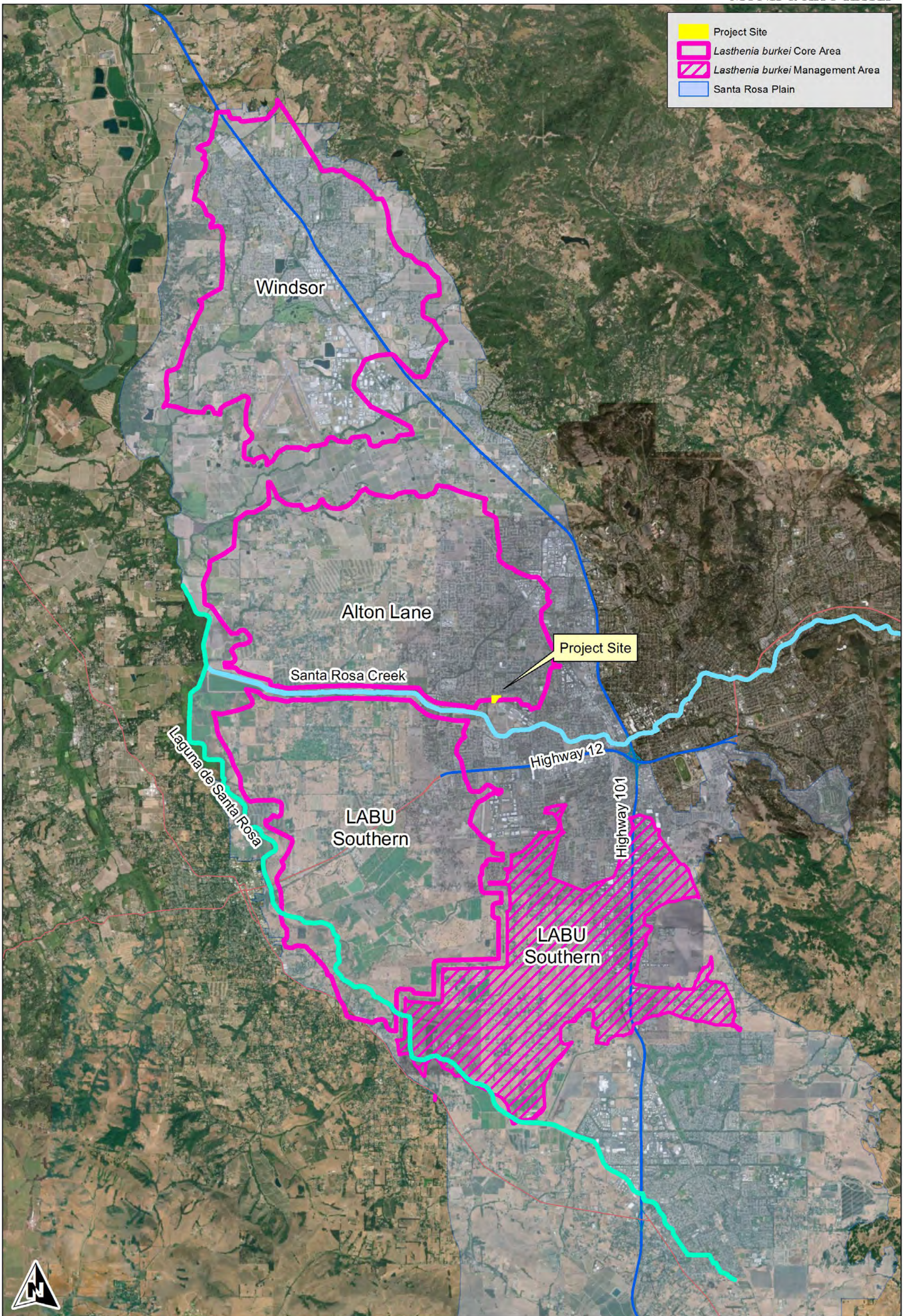


Figure 6. *Lasthenia burkei* Core and Management Areas (from USFWS 2016) in the Vicinity of the 2150 W College Avenue Project Site

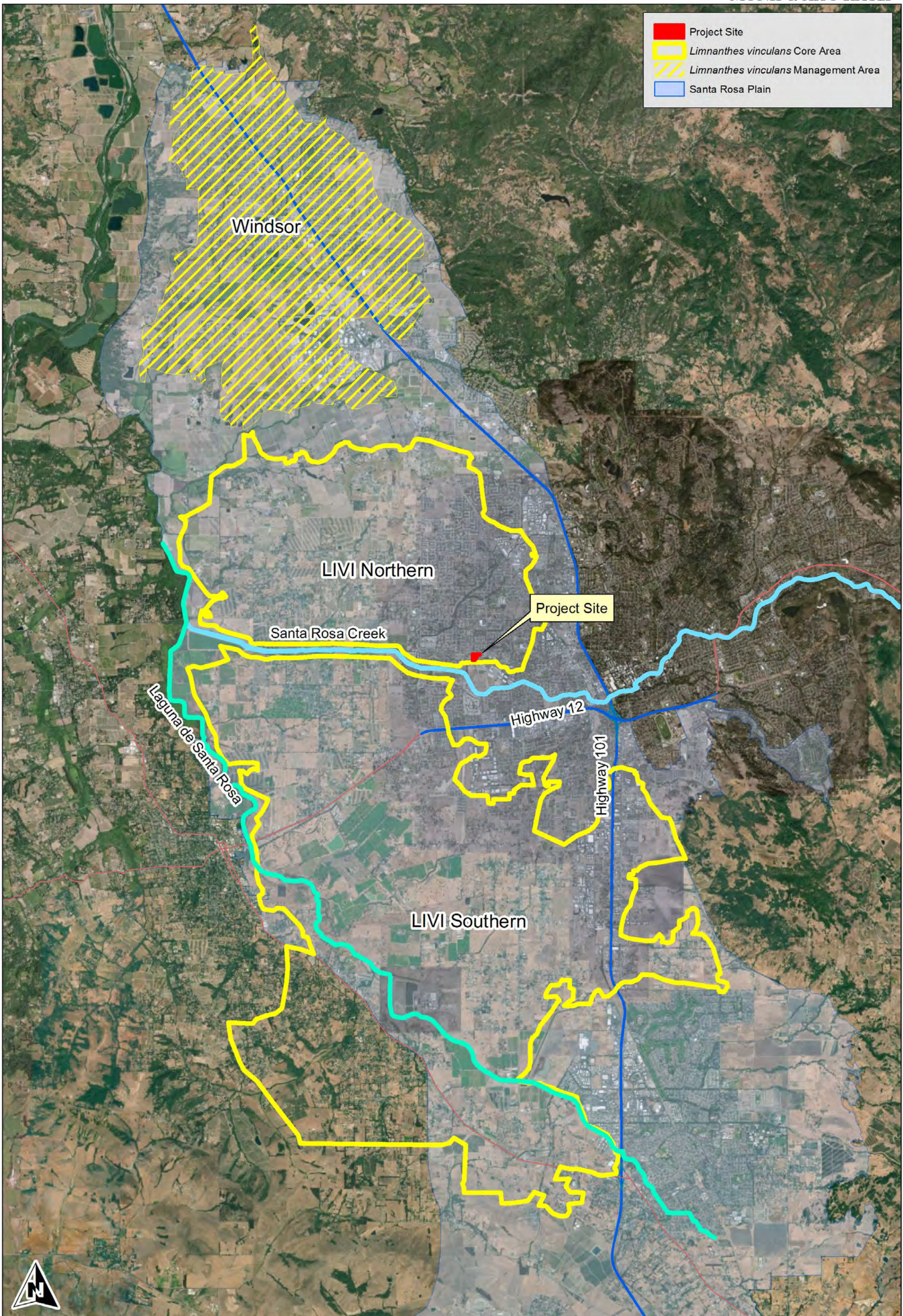


Figure 7. *Limnanthes vinculans* Core and Management Areas (from USFWS 2016) in the Vicinity of the 2150 W College Avenue Project Site

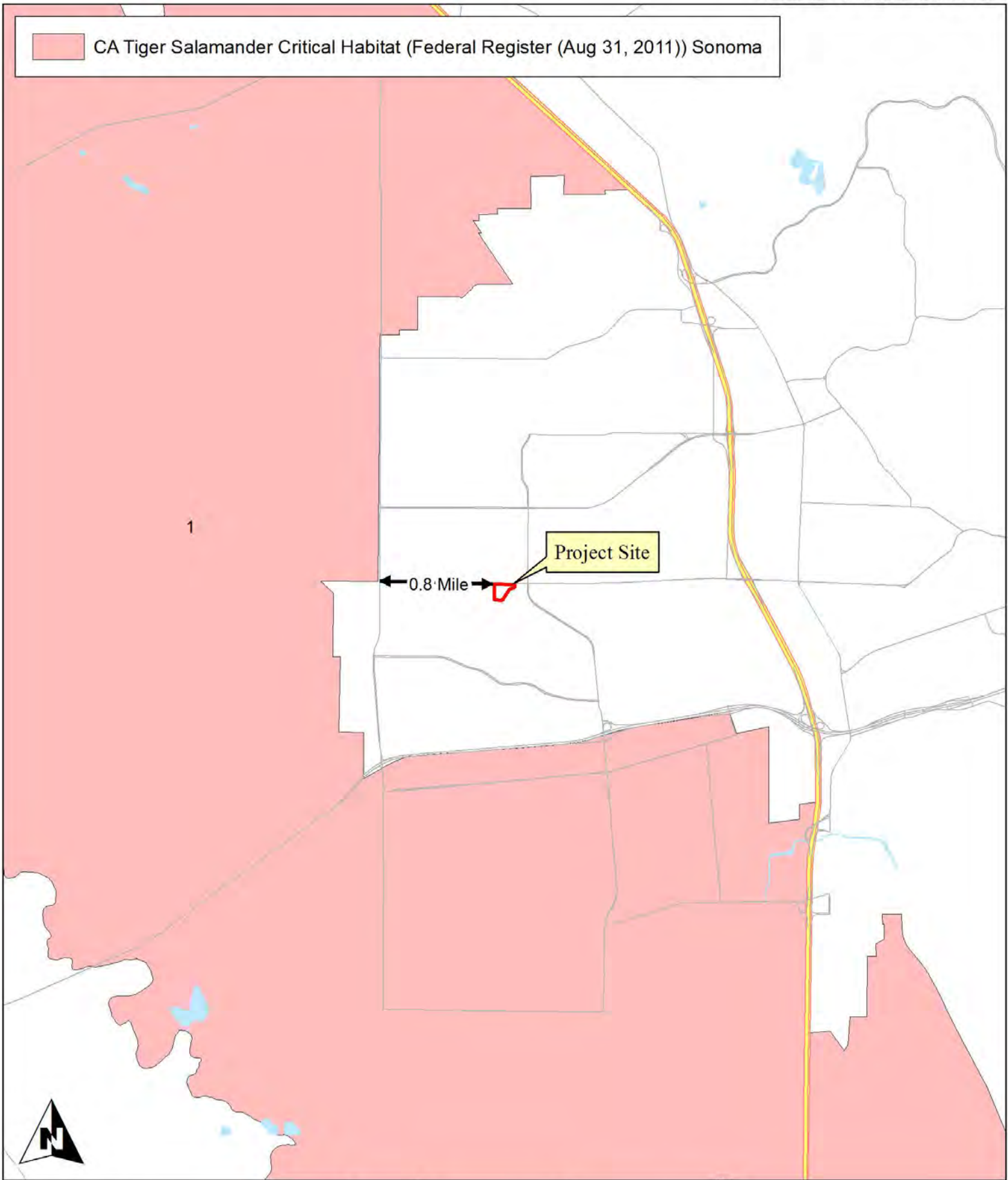


Figure 8. USFWS Critical Habitat in the Vicinity of the 2150 W College Avenue Project Site

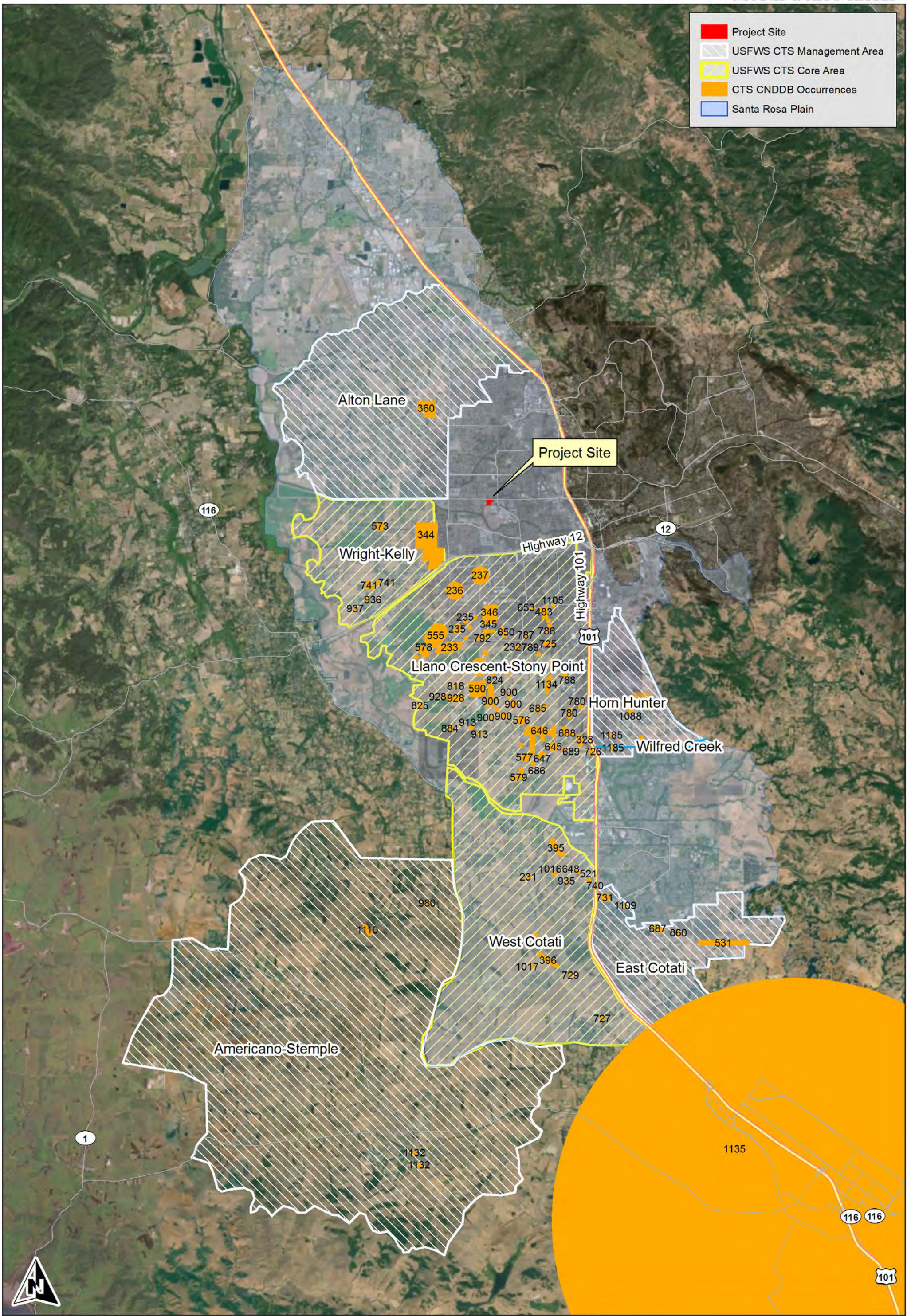


Figure 9. California Tiger Salamander Core Conservation and Management Areas (from USFWS 2016) in the Vicinity of the 2150 W College Avenue Project Site



- Project Site
- Easement
- College Creek
- Offsite Ditches



0 50 100 200 300 Feet

Figure 10. Adjacent Waters of the U.S./State
2150 W College Avenue Project Site
Santa Rosa, California

Monk & Associates
Environmental Consultants
1136 Saranap Avenue, Suite Q
Walnut Creek, California 94595
(925) 947-4867

Aerial Photograph Source: ESRI
Map Preparation Date: March 6, 2019

Table 1

Plant Species Observed on the 2150 W College Avenue Project Site

Gymnosperms

Cupressaceae

<i>Sequoia sempervirens</i>	Redwood
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Angiosperms - Dicots

Apiaceae

* <i>Conium maculatum</i>	Poison hemlock
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* <i>Foeniculum vulgare</i>	Sweet fennel
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Apocynaceae

* <i>Nerium oleander</i>	Oleander
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* <i>Trachelospermum jasminoides</i>	Star Jasmine
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Araliaceae

* <i>Hedera helix</i>	English ivy
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Asteraceae

* <i>Anthemis cotula</i>	Mayweed
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* <i>Carduus pycnocephalus subsp. pycnocephalus</i>	Italian thistle
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<i>Erigeron canadensis</i>	Horseweed
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* <i>Helminthotheca echioides</i>	Bristly ox-tongue
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* <i>Hypochaeris radicata</i>	Rough cat's-ear
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* <i>Senecio vulgaris</i>	Common groundsel
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* <i>Sonchus oleraceus</i>	Common sow-thistle
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<i>Tracyina rostrata</i>	Beaked tracyina
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Caryophyllaceae

* <i>Stellaria media</i>	Common chickweed
--------------------------	------------------

Fabaceae

* <i>Acacia mearnsii</i>	Black wattle
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* <i>Medicago polymorpha</i>	California burclover
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* <i>Vicia sativa</i>	Common vetch
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Fagaceae

<i>Quercus agrifolia</i> var. <i>agrifolia</i>	Coast live oak
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<i>Quercus lobata</i>	Valley oak
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Geraniaceae

* <i>Geranium dissectum</i>	Cut-leaf geranium
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Hamamelidaceae

* <i>Loropetalum chinense</i>	Chinese fringe flower
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Jasmine

* <i>Jasminum polyanthium</i>	Pink jasmine
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Oleaceae

* <i>Ligustrum japonicum</i>	Japanese privet
------------------------------	-----------------

Table 1**Plant Species Observed on the 2150 W College Avenue Project Site**

Platanaceae	
<i>Platanus sp.</i>	Sycamore
<i>Platanus xhispanica</i>	London Plane Tree
Rosaceae	
* <i>Rubus armeniacus</i>	Himalayan blackberry
Rubiaceae	
<i>Galium aparine</i>	Goose grass
Scrophulariaceae	
* <i>Verbascum blattaria</i>	Moth mullein
Angiosperms -Monocots	
Amaryllidaceae	
* <i>Agapanthus orientalis</i>	Lilly-of-the-Nile
Cyperaceae	
<i>Cyperus eragrostis</i>	Tall flatsedge
Iridaceae	
<i>Iris sp.</i>	Iris
Poaceae	
* <i>Bromus diandrus</i>	Ripgut grass
* <i>Bromus hordeaceus</i>	Soft chess
* <i>Cynodon dactylon</i>	Bermudagrass
* <i>Festuca bromoides</i>	Brome fescue
* <i>Phalaris aquatica</i>	Harding grass

Table 2
Wildlife Species Observed on the 2150 W College Avenue Project Site

Birds	
Red-shouldered hawk	<i>Buteo lineatus</i>
Mourning dove	<i>Zenaida macroura</i>
Anna's hummingbird	<i>Calypte anna</i>
Black phoebe	<i>Sayornis nigricans</i>
California scrub jay	<i>Aphelocoma californica</i>
American crow	<i>Corvus brachyrhynchos</i>
Oak titmouse	<i>Baeolophus inornatus</i>
Bushtit	<i>Psaltriparus minimus</i>
Ruby-crowned kinglet	<i>Regulus calendula</i>
American robin	<i>Turdus migratorius</i>
Yellow-rumped warbler	<i>Setophaga coronata</i>
California towhee	<i>Pipilo crissalis</i>
Golden-crowned sparrow	<i>Zonotrichia atricapilla</i>
House finch	<i>Haemorhous mexicanus</i>
House sparrow	<i>Passer domesticus</i>
Mammals	
California ground squirrel	<i>Otospermophilus beecheyi</i>

Table 3

Special-Status Plant Species Known to Occur Within 3 Miles of the 2150 W College Avenue Project

Family Taxon Common Name	Status*	Flowering Period	Habitat	Area Locations	Probability on Project Site
Asteraceae					
<i>Blennosperma bakeri</i> Sonoma sunshine	Fed: FE State: CE CNPS: Rank 1B.1	February-April	Valley and foothill grassland (mesic); vernal pools.	The closest record of this species is located 1.3 miles northwest of the project site (Occurrence No. 13).	None. No suitable habitat onsite. Site is developed.
<i>Hemizonia congesta congesta</i> White seaside tarplant	Fed: - State: - CNPS: Rank 1B.2	April-November	Valley and foothill grassland. 20 to 560 meters. Clay soils	The closest record of this species is located 1.1 miles southwest of the project site (Occurrence No. 27).	None. No suitable habitat onsite. Site is developed.
<i>Lasthenia burkei</i> Burke's goldfields	Fed: FE State: CE CNPS: Rank 1B.1	April-June	Meadows and seeps (mesic); vernal pools.	The closest record of this species is located 1.4 miles north of the project site (Occurrence No. 19).	None. No suitable habitat onsite. Site is developed.
Boraginaceae					
<i>Amsinckia lunaris</i> Bent-flowered fiddleneck	Fed: - State: - CNPS: Rank 1B.2	March-June	Cismontane woodland, valley and foothill grassland, coastal bluff scrub.	The closest record of this species is located 1.7 miles east of the project site (Occurrence No. 37).	None. No suitable habitat onsite. Site is developed.
Campanulaceae					
<i>Downingia pusilla</i> Dwarf downingia	Fed: - State: - CNPS: Rank 2.2	March-May	Valley and foothill grassland (mesic); vernal pools.	The closest record of this species is located 1.2 miles north of the project site (Occurrence No. 84).	None. No suitable habitat onsite. Site is developed.
<i>Legenere limosa</i> Legenere	Fed: - State: - CNPS: Rank 1B.1	April-June	Vernal pools.	The closest record of this species is located 3.0 miles south of the project site (Occurrence No. 39).	None. No suitable habitat onsite. Site is developed.

Table 3

Special-Status Plant Species Known to Occur Within 3 Miles of the 2150 W College Avenue Project

Family Taxon Common Name	Status*	Flowering Period	Habitat	Area Locations	Probability on Project Site
Fabaceae					
<i>Trifolium amoenum</i> Showy Indian clover	Fed: FE State: - CNPS: Rank 1B.1	April-June	Valley and foothill grassland (sometimes serpentinite)	The closest record of this species is located 1.0 miles southwest of the project site (Occurrence No. 20).	None. No suitable habitat onsite. Site is developed.
<i>Trifolium buckwestiorum</i> Santa Cruz clover	Fed: - State: - CNPS: Rank 1B	May-July	Broadleaf upland forest; coastal prairie; [margins].	The closest record of this species is located 1.1 miles east of the project site (Occurrence No. 35).	None. No suitable habitat onsite. Site is developed.
<i>Trifolium hydrophilum</i> Saline clover	Fed: - State: - CNPS: Rank 1B.2	April-June	Marshes and swamps; valley and foothill grassland (mesic, alkaline); vernal pools. 0-300 m.	The closest record of this species is located 1.0 miles southwest of the project site (Occurrence No. 16).	None. No suitable habitat onsite. Site is developed.
Limnanthaceae					
<i>Limnanthes vinculans</i> Sebastopol meadowfoam	Fed: FE State: CE CNPS: Rank 1B.1	April-May	Meadows (mesic); vernal pools.	The closest record of this species is located 1.2 miles south of the project site (Occurrence No. 31).	None. No suitable habitat onsite. Site is developed.
Polemoniaceae					
<i>Leptosiphon jepsonii</i> Jepson's leptosiphon	Fed: - State: - CNPS: Rank 1B.2	March-May	Chaparral; cismontane woodland (usually volcanic).	The closest record of this species is located 1.1 miles east of the project site (Occurrence No. 3).	None. No suitable habitat onsite. Site is developed.
<i>Navarretia leucocephala bakeri</i> Baker's navarretia	Fed: - State: - CNPS: Rank 1B.1	May-July	Cismontane woodland; lower montane coniferous forest; meadows (mesic); valley and foothill grassland; vernal pools.	The closest record of this species is located 1.2 miles southwest of the project site (Occurrence No. 21).	None. No suitable habitat onsite. Site is developed.

Table 3

Special-Status Plant Species Known to Occur Within 3 Miles of the 2150 W College Avenue Project

Family	Taxon	Status*	Flowering Period	Habitat	Area Locations	Probability on Project Site
Common Name						

***Status**

Federal:

- FE - Federal Endangered
- FT - Federal Threatened
- FPE - Federal Proposed Endangered
- FPT - Federal Proposed Threatened
- FC - Federal Candidate

State:

- CE - California Endangered
- CT - California Threatened
- CR - California Rare
- CC - California Candidate
- CSC - California Species of Special Concern

CNPS Continued:

CNPS:

- Rank 1A - Presumed extinct in California
- Rank 1B - Plants rare, threatened, or endangered in California and elsewhere
- Rank 1B.1 - Seriously endangered in California (over 80% occurrences threatened/ high degree and immediacy of threat)
- Rank 1B.2 - Fairly endangered in California (20-80% occurrences threatened)
- Rank 1B.3 - Not very endangered in California (<20% of occurrences threatened or no current threats known)

- Rank 2 - Plants rare, threatened, or endangered in California, but more common elsewhere
- Rank 2A - Extirpated in California, common elsewhere
- Rank 2B.1 - Seriously endangered in California, but more common elsewhere
- Rank 2B.2 - Fairly endangered in California, but more common elsewhere
- Rank 2B.3 - Not very endangered in California, but more common elsewhere
- Rank 3 - Plants about which we need more information (Review List)
- Rank 3.1 - Plants about which we need more information (Review List)
Seriously endangered in California
- Rank 3.2 - Plants about which we need more information (Review List)
Fairly endangered in California
- Rank 4 - Plants of limited distribution - a watch list

Table 4
Special-Status Wildlife Species Known to Occur Within 3 Miles of the 2150 W College Avenue Project

Species	*Status	Habitat	Closest Locations	Probability on Project Site
Amphibians				
California tiger salamander <i>Ambystoma californiense</i>	Fed: FT State: CT Other:	Found in grassland habitats of the valleys and foothills. Requires burrows for aestivation and standing water until late spring (May) for larvae to metamorphose.	The closest record for this species is located approximately 1.2 miles southwest of the project site (Occurrence No. 344).(2016) Wright Preservation Bank.	None. No suitable habitat onsite. Site is isolated from known records by migration barriers. See text.
Reptiles				
Western pond turtle ** <i>Emys marmorata</i>	Fed: - State: CSC Other:	Inhabits ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation. Needs suitable basking sites and upland habitat for egg laying. Occurs in the Central Valley and Contra Costa County.	The closest record for this species is located approximately 0.7 miles northwest of the project site (Occurrence No. 582). (2003) Unnamed Flood Channel/Creek.	None. No habitat onsite. May occur in College Creek adjacent to project site. See text.
Birds				
White-tailed kite <i>Elanus leucurus</i>	Fed: State: Other: FP	Found in lower foothills and valley margins with scattered oaks and along river bottomlands or marshes adjacent to oak woodlands. Nests in trees with dense tops.	The closest record for this species is located approximately 2.7 miles southeast of the project site (Occurrence No. 77).	Low. Potential nesting habitat on and adjacent to project site. Preconstruction surveys will be conducted.
Cooper's hawk <i>Accipiter cooperii</i>	Fed: - State: WL Other:	Nests in heavily wooded areas along streams, rivers, or near springs/seeps. Prefers to nest in tall canopies with an open understory usually near openings. Oak and riparian woodlands are preferred habitats.	The closest record for this species is located approximately 1.6 miles southeast of the project site (Occurrence No. 138).	Low. Potential nesting habitat on and adjacent to project site. Preconstruction surveys will be conducted.

Table 4

Special-Status Wildlife Species Known to Occur Within 3 Miles of the 2150 W College Avenue Project

Species	*Status	Habitat	Closest Locations	Probability on Project Site
Mammals				
American badger <i>Taxidea taxus</i>	Fed: - State: CSC Other:	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Need sufficient food, friable soils & open, uncultivated ground. Prey on burrowing rodents. Dig burrows.	The closest record for this species is located approximately 1.4 miles southwest of the project site (Occurrence No. 28). (2003) Hall Road and Wright Avenue.	None. No suitable habitat onsite. Site is isolated from known records by migration barriers.

***Status**

- | | |
|--|---|
| Federal: | State: |
| FE - Federal Endangered | CE - California Endangered |
| FT - Federal Threatened | CT - California Threatened |
| FPE - Federal Proposed Endangered | CR - California Rare |
| FPT - Federal Proposed Threatened | CC - California Candidate |
| FC - Federal Candidate | CSC - California Species of Special Concern |
| FPD - Federally Proposed for delisting | FP - Fully Protected |
| | WL - Watch List. Not protected pursuant to CEQA |

**The USFWS hopes to finish a 12-month finding for western pond turtle in 2021 but until formally listed, it is not afforded the protections of FESA.

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D.2 - RareFind Summary Report

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CALIFORNIA DEPARTMENT OF
FISH and WILDLIFE *RareFind*

Query Summary:
 Quad IS (Santa Rosa (3812246))

CNDDDB Element Query Results

Scientific Name	Common Name	Taxonomic Group	Element Code	Total Occs	Returned Occs	Federal Status	State Status	Global Rank	State Rank	CA Rare Plant Rank	Other Status	Habitats
<i>Accipiter cooperii</i>	Cooper's hawk	Birds	ABNKC12040	118	1	None	None	G5	S4	null	CDFW_WL-Watch List, IUCN_LC-Least Concern	Cismontane woodland, Riparian forest, Riparian woodland, Upper montane coniferous forest
<i>Ambystoma californiense</i>	California tiger salamander	Amphibians	AAAAA01180	1206	28	Threatened	Threatened	G2G3	S2S3	null	CDFW_WL-Watch List, IUCN_VU-Vulnerable	Cismontane woodland, Meadow & seep, Riparian woodland, Valley & foothill grassland, Vernal pool, Wetland
<i>Amorpha californica</i> var. <i>napensis</i>	Napa false indigo	Dicots	PDFAB08012	76	1	None	None	G4T2	S2	1B.2	SB_RSABG-Rancho Santa Ana Botanic Garden	Broadleaved upland forest, Chaparral, Cismontane woodland
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	Dicots	PDBOR01070	93	1	None	None	G3	S3	1B.2	BLM_S-Sensitive, SB_UCBBG-UC Berkeley Botanical Garden, SB_UCSC-UC Santa Cruz	Cismontane woodland, Coastal bluff scrub, Valley & foothill grassland
<i>Andrena blennospermatris</i>	Blennosperma vernal pool andrenid bee	Insects	IIHYM35030	15	1	None	None	G2	S2	null	null	Vernal pool
<i>Arctostaphylos stanfordiana</i> ssp. <i>decumbens</i>	Rincon Ridge manzanita	Dicots	PDERI041G4	12	4	None	None	G3T1	S1	1B.1	null	Chaparral, Cismontane woodland
<i>Astragalus claranus</i>	Clara Hunt's milk-vetch	Dicots	PDFAB0F240	6	2	Endangered	Threatened	G1	S1	1B.1	SB_RSABG-Rancho Santa Ana Botanic Garden	Chaparral, Cismontane woodland, Valley & foothill grassland
<i>Balsamorhiza macrolepis</i>	big-scale balsamroot	Dicots	PDAST11061	51	2	None	None	G2	S2	1B.2	BLM_S-Sensitive, USFS_S-Sensitive	Chaparral, Cismontane woodland, Ultramafic, Valley & foothill grassland
<i>Blennosperma bakeri</i>	Sonoma sunshine	Dicots	PDAST1A010	24	6	Endangered	Endangered	G1	S1	1B.1	SB_RSABG-Rancho Santa Ana Botanic Garden	Valley & foothill grassland, Vernal pool, Wetland
<i>Bombus caliginosus</i>	obscure bumble bee	Insects	IIHYM24380	181	1	None	None	G4?	S1S2	null	IUCN_VU-Vulnerable	null
<i>Bombus occidentalis</i>	western bumble bee	Insects	IIHYM24250	280	1	None	Candidate Endangered	G2G3	S1	null	USFS_S-Sensitive, XERCES_IM-Imperiled	null
<i>Brodiaea leptandra</i>	narrow-anthered brodiaea	Monocots	PMLIL0C022	39	2	None	None	G3?	S3?	1B.2	null	Broadleaved upland forest, Chaparral, Cismontane woodland, Lower montane coniferous forest, Valley & foothill grassland
<i>Ceanothus confusus</i>	Rincon Ridge ceanothus	Dicots	PDRHA04220	33	2	None	None	G1	S1	1B.1	BLM_S-Sensitive, SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Cismontane woodland, Closed-cone coniferous forest, Ultramafic
<i>Ceanothus divergens</i>	Calistoga ceanothus	Dicots	PDRHA04240	26	1	None	None	G2	S2	1B.2	BLM_S-Sensitive	Chaparral, Cismontane woodland, Ultramafic
<i>Ceanothus purpureus</i>	holly-leaved ceanothus	Dicots	PDRHA04160	43	1	None	None	G2	S2	1B.2	SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Cismontane woodland
<i>Ceanothus sonomensis</i>	Sonoma ceanothus	Dicots	PDRHA04420	30	1	None	None	G2	S2	1B.2	SB_SBBG-Santa Barbara Botanic Garden	Chaparral, Ultramafic
<i>Coturnicops</i>	yellow rail	Birds	ABNME01010	45	1	None	None	G4	S1S2	null	CDFW_SSC-Species of	Freshwater marsh, Meadow & seep

noveboracensis											Special Concern, IUCN_LC-Least Concern, NABCI_RWL-Red Watch List, USFS_S-Sensitive, USFWS_BCC-Birds of Conservation Concern	
Dicamptodon ensatus	California giant salamander	Amphibians	AAAAH01020	234	1	None	None	G3	S2S3	null	CDFW_SSC-Species of Special Concern, IUCN_NT-Near Threatened	Aquatic, Meadow & seep, North coast coniferous forest, Riparian forest
Elanus leucurus	white-tailed kite	Birds	ABNKC06010	180	1	None	None	G5	S3S4	null	BLM_S-Sensitive, CDFW_FP-Fully Protected, IUCN_LC-Least Concern	Cismontane woodland, Marsh & swamp, Riparian woodland, Valley & foothill grassland, Wetland
Emys marmorata	western pond turtle	Reptiles	ARAAD02030	1375	10	None	None	G3G4	S3	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_VU-Vulnerable, USFS_S-Sensitive	Aquatic, Artificial flowing waters, Klamath/North coast flowing waters, Klamath/North coast standing waters, Marsh & swamp, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South coast flowing waters, South coast standing waters, Wetland
Fritillaria liliacea	fragrant fritillary	Monocots	PMLI0V0C0	82	6	None	None	G2	S2	1B.2	SB_RSABG-Rancho Santa Ana Botanic Garden, USFS_S-Sensitive	Cismontane woodland, Coastal prairie, Coastal scrub, Ultramafic, Valley & foothill grassland
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	Dicots	PDAST4R065	52	1	None	None	G5T2	S2	1B.2	SB_UCBBG-UC Berkeley Botanical Garden	Valley & foothill grassland
Lasthenia burkei	Burke's goldfields	Dicots	PDAST5L010	35	4	Endangered	Endangered	G1	S1	1B.1	SB_RSABG-Rancho Santa Ana Botanic Garden, SB_UCBBG-UC Berkeley Botanical Garden	Meadow & seep, Vernal pool, Wetland
Layia septentrionalis	Colusa layia	Dicots	PDAST5N0F0	57	1	None	None	G2	S2	1B.2	BLM_S-Sensitive, SB_UCBBG-UC Berkeley Botanical Garden	Chaparral, Cismontane woodland, Ultramafic, Valley & foothill grassland
Leptosiphon jepsonii	Jepson's leptosiphon	Dicots	PDPLM09140	51	1	None	None	G2G3	S2S3	1B.2	SB_RSABG-Rancho Santa Ana Botanic Garden, SB_USDA-US Dept of Agriculture	Chaparral, Cismontane woodland, Ultramafic, Valley & foothill grassland
Limnanthes vinculans	Sebastopol meadowfoam	Dicots	PDLIM02090	46	8	Endangered	Endangered	G1	S1	1B.1	SB_RSABG-Rancho Santa Ana Botanic Garden, SB_UCBBG-UC Berkeley Botanical Garden	Meadow & seep, Valley & foothill grassland, Vernal pool, Wetland
Linderiella occidentalis	California linderiella	Crustaceans	ICBRA06010	438	3	None	None	G2G3	S2S3	null	IUCN_NT-Near Threatened	Vernal pool
Navarretia leucocephala ssp. bakeri	Baker's navarretia	Dicots	PDPLM0C0E1	58	1	None	None	G4T2	S2	1B.1	BLM_S-Sensitive	Cismontane woodland, Lower montane coniferous forest, Meadow & seep, Valley & foothill grassland, Vernal pool, Wetland
Rana boylei	foothill yellow-legged frog	Amphibians	AAABH01050	2468	1	None	Candidate Threatened	G3	S3	null	BLM_S-Sensitive, CDFW_SSC-Species of Special Concern, IUCN_NT-Near Threatened, USFS_S-Sensitive	Aquatic, Chaparral, Cismontane woodland, Coastal scrub, Klamath/North coast flowing waters, Lower montane coniferous forest, Meadow & seep, Riparian forest, Riparian woodland, Sacramento/San Joaquin flowing waters
Rana draytonii	California red-legged frog	Amphibians	AAABH01022	1541	2	Threatened	None	G2G3	S2S3	null	CDFW_SSC-Species of Special Concern, IUCN_VU-Vulnerable	Aquatic, Artificial flowing waters, Artificial standing waters, Freshwater marsh, Marsh & swamp, Riparian forest, Riparian scrub, Riparian woodland, Sacramento/San Joaquin flowing waters, Sacramento/San Joaquin standing waters, South coast flowing waters, South coast standing waters, Wetland
Trifolium amoenum	two-fork clover	Dicots	PDFAB40040	26	1	Endangered	None	G1	S1	1B.1	SB_RSABG-Rancho Santa Ana Botanic Garden, SB_UCBBG-UC Berkeley	Coastal bluff scrub, Ultramafic, Valley & foothill grassland



											Botanical Garden, SB_USDA-US Dept of Agriculture	
Trifolium buckwestiorum	Santa Cruz clover	Dicots	PDFAB402W0	58	1	None	None	G2	S2	1B.1	BLM_S-Sensitive, SB_SBBG-Santa Barbara Botanic Garden, SB_UCSC-UC Santa Cruz, SB_USDA-US Dept of Agriculture	Broadleaved upland forest, Cismontane woodland, Coastal prairie
Trifolium hydrophilum	saline clover	Dicots	PDFAB400R5	49	2	None	None	G2	S2	1B.2	null	Marsh & swamp, Valley & foothill grassland, Vernal pool, Wetland
Triquetrella californica	coastal triquetrella	Bryophytes	NBMUS7S010	13	1	None	None	G2	S2	1B.2	USFS_S-Sensitive	Coastal bluff scrub, Coastal scrub
Valley Needlegrass Grassland	Valley Needlegrass Grassland	Herbaceous	CTT42110CA	45	1	None	None	G3	S3.1	null	null	Valley & foothill grassland

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D.3 - SRPCS Map

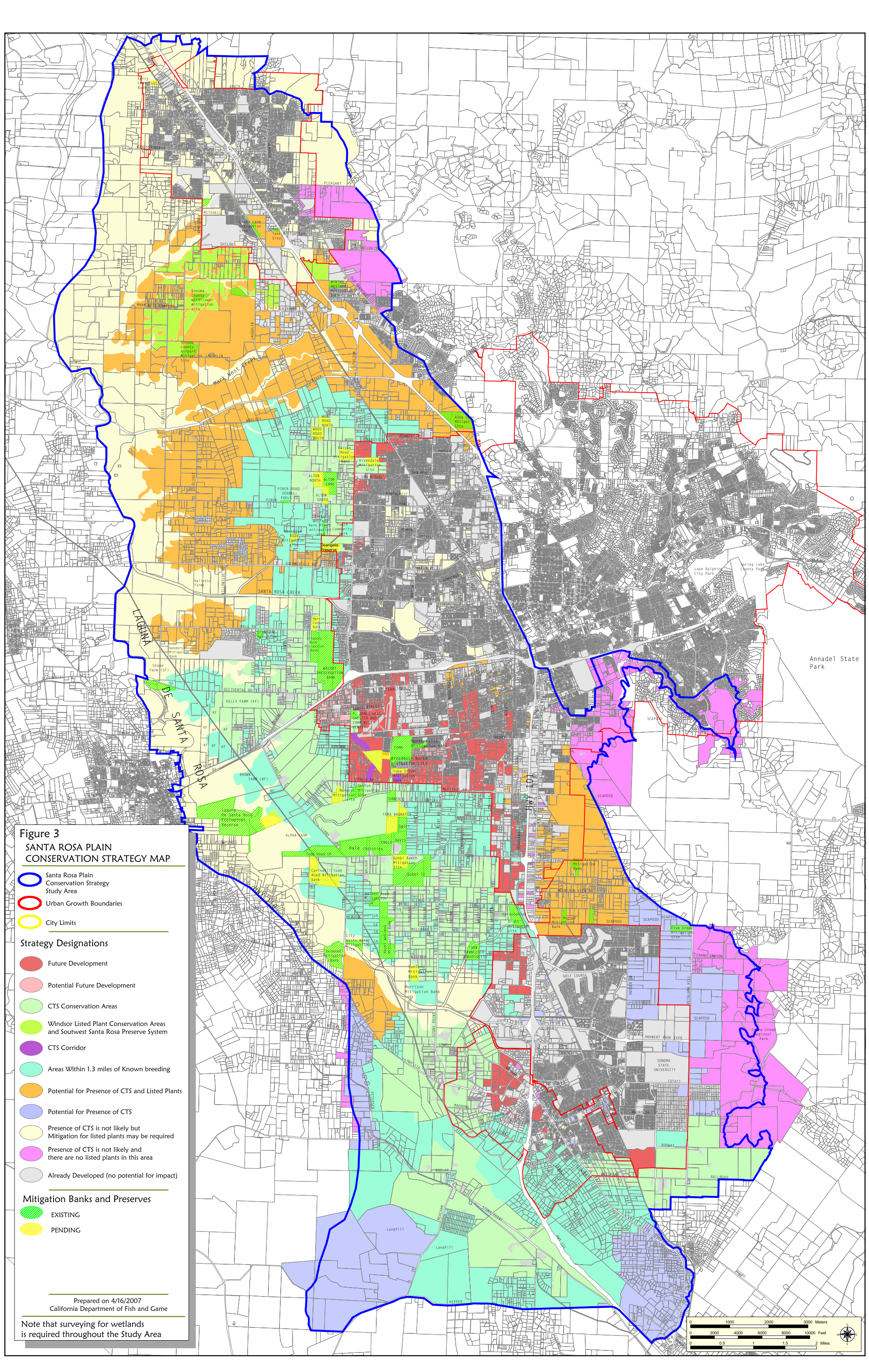
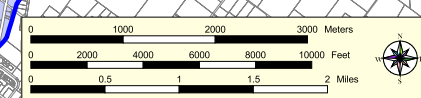
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Figure 3
SANTA ROSA PLAIN
CONSERVATION STRATEGY MAP

-  Santa Rosa Plain Conservation Strategy Study Area
 -  Urban Growth Boundaries
 -  City Limits
- Strategy Designations**
-  Future Development
 -  Potential Future Development
 -  CTS Conservation Areas
 -  Windsor Listed Plant Conservation Areas and Southwest Santa Rosa Preserve System
 -  CTS Corridor
 -  Areas Within 1.3 miles of Known breeding
 -  Potential for Presence of CTS and Listed Plants
 -  Potential for Presence of CTS
 -  Presence of CTS is not likely but Mitigation for listed plants may be required
 -  Presence of CTS is not likely and there are no listed plants in this area
 -  Already Developed (no potential for impact)
- Mitigation Banks and Preserves**
-  EXISTING
 -  PENDING

Prepared on 4/16/2007
 California Department of Fish and Game

Note that surveying for wetlands is required throughout the Study Area



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