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February 26, 2018

Mr. Patrick Streeter
City of Santa Rosa
Planning and Economic Development Department
100 Santa Rosa Ave., Room 3
Santa Rosa, CA 95404

Re: Response to Application Issues for 'Dutton Avenue Residences' at 3150 Dutton Avenue, (Sonoma Co. A.P.N. 043-133-013)

City file: DR17-074

Dear Mr. Streeter:

As a biologist retained to assist site development, and with close familiarity with the property, I am writing to provide a supplemental evaluation for the most recent revised layout for the above-referenced project, as well a response to the specific questions and issues raised by the City (item 23) in the letter to the applicant dated January 5, 2018. I have prepared this supplemental report to address specifically the small wetland area in relation to the latest layout.

To summarize the site's existing baseline conditions, detailed surveys were conducted on the site in 2005, 2012, 2013, 2014, and 2015, completing protocol botanical surveys and a formal wetland delineation. An official "Preliminary Jurisdictional Determination" or PJD from the U. S. Army Corps of Engineers was issued in 2015, with the only onsite "wetland" being a very small (0.037 acre) depression with extremely low quality (i.e., shallow, man-made, non-aquatic, non-native) seasonal wetland on the site's eastern fenceline. Given all the historic local disturbances (from the adjacent paved street, warehouse, parking lots, and railroad construction, to onsite soil and trash deposition, disking and historic farming, plus expanding areawide storm drains and pavement), the site is surrounded by urban development, with the lone onsite wetland feature being highly isolated from any other significant wetlands (or any other natural resource habitats or features). While meeting the Corps' established technical criteria for "wetlands" (i.e., prolonged soil saturation, hydrophytic or neutral plants, evidence of surface hydrology), at least in wetter years, this small feature provides almost no measurable wetland resource values, i.e., there is no aquatic habitat, it is fully dominated by non-native, non-wetland grasses, it is completely dry 7 to 8 months per year, and in drier years, probably does not qualify as "wetland" at all. In any year, this small isolated grassy divot provides no suitable habitat for any regionally known listed species, plants or wildlife.

In addition to these baseline surveys, I have reviewed the applicant's site development plans, including the specific current provisions to achieve complete wetland avoidance. Avoidance of wetlands is the agencies' stated preferred approach wherever possible, and the current project layout achieves that objective.

Aside from the minor solitary seasonal wetland on the eastern fenceline, the site is completely lacking any other wetlands or significant biotic resources. Hence, the proposed project would have very minimal impacts to biological resources overall, and no (zero) wetland would be filled or directly affected by the project. Further, no other onsite or nearby wetland resources would be lost, significantly compromised, or otherwise adversely affected. Indirect impacts to wetland resources would also be minimal because (1) there are no other significant wetland features or systems in the proximity (none onsite, up-gradient, or down-gradient), (2) the functions and values (hydrologic, biotic, ecologic) associated with this specific small grassy divot (that will be avoided anyway) are almost negligible (hence, even a complete loss would be relatively insignificant), and (3) the avoided feature does not rely on the rest of the site for hydration (i.e., it becomes "wet" simply from direct rainfall and immediate depression-area sheet flow (soil saturation being driven by the underlying clay hardpan). No wetlands occur up-gradient of this feature, and the only possible qualifying (jurisdictional) "wetlands" down-gradient would be the broad man-made (similarly grassy and non-aquatic) swale-ditch along the base of the adjoining elevated railroad embankment, created specifically to capture and transmit runoff from and along the railroad line.

Standard measures to protect water quality during and after construction should be implemented, and the small wetland feature should be fenced so as to preclude vehicular disturbance or material dumping. In addition, a small runoff collection trough and berm should be installed along the eastern edge of the adjacent roadway, specifically to collect runoff from the road and transmit it southward past the small wetland before exiting the site (either offsite toward the railroad easement or into a storm drain). Alternatively, if the entire roadway can be designed to have a slight slant westward (taking all road surface runoff that direction, away from the wetland, then a simple curb/berm right on/along the eastern edge of the road would suffice.

Regarding the potential need for set-backs, the following three factors reduce the need for a significant or wide protective set-back:

(1) There are truly no significant wetland resource attributes to protect here (and what is present is isolated/fragmented to the extreme). A large distance buffer would not provide any greater protection for any significant wetland resource(s), and the meager values of the depression itself are not especially threatened by not having a large set-back.

(2) The immediately surrounding grassland (0 to 20 feet from the divot itself) is the 'perfect' medium to capture and filter any spills or other materials that might enter the fenced area. With very low gradient and a vegetated surface cover, spilled materials would not move far laterally, and a wide buffer should not be needed here, especially where little is at stake. There simply is no significant natural 'habitat' (or other ecological or hydrological function) to be protected by a larger set-back.

(3) The wetland divot does not rely on areawide runoff (watershed).

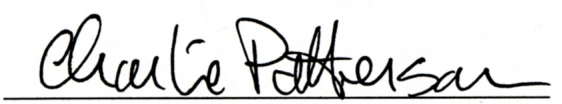
Thus, a short distance of the local grassland (as provided on the latest site plans) should serve to provide protection commensurate with the resource values to be protected. The nominal set-backs currently shown, plus standard BMPs and the capture/shunting of roadway runoff should be adequate in this situation.

Given that there are no significant biological resources present onsite, there is no need for any related mitigation measures or formal wetland or sensitive species permitting. Avoidance of the wetland feature eliminates the need for any further involvement by the Corps of Engineers, i.e., there is no Corps permit required, and there are no Corps-required set-backs. With no Corps permit required, there is no

requirement or stipulation for (which actually comes from a formal Corps permit) to obtain "401 Certification" from the California Regional Water Quality Control Board (it simply doesn't apply). As such, the only involvement by the Water Board is to potentially review the project's onsite runoff treatment measures and BMPs during construction.

I hope this helps clarify the situation for this project/site. Please feel free to contact me if you have any questions or need additional information.

Sincerely,



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