2081 INCIDENTAL TAKE PERMIT APPLICATION

BECOMING INDEPENDENT PARKING LOT PROJECT

CITY OF SANTA ROSA, SONOMA COUNTY, CALIFORNIA

LSA

July 2024

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Submitted to:

California Department of Fish and Wildlife
2825 Cordelia Road Unit 100
Fairfield, California 94534

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Project No. 20230571

LSA

July 2024

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LIST OF ABBREVIATIONS AND ACRONYMS

BMPs	Best Management Practices
CDFW	California Department of Fish and Wildlife
CTS	California tiger salamander
DPS	Distinct Population Segment
CESA	California Endangered Species Act
Corps	U.S. Army Corps of Engineers
ITP	Incidental Take Permit
SWPPP	Storm Water Pollution Prevention Plan
USFWS	U.S. Fish and Wildlife Service

INTRODUCTION

On behalf of our client, Becoming Independent, LSA Associates, Inc. (LSA) is submitting this application to the California Department of Fish and Wildlife (CDFW) for a Section 2081 Incidental Take Permit (ITP) for the Becoming Independent Parking Lot Project in Santa Rosa, Sonoma County.

This application was prepared to comply with the California Endangered Species Act (CESA) Authorization Process (Title 14, Section 783.2) and to provide the required documentation for the proposed project.

APPLICANT

Becoming Independent
Contact Person: Luana Vaetoe, Executive Director
Mailing Address: 1455 Corporate Center Parkway, California 95407
Phone: 707-524-6607; email: lvaetoe@becomingindependent.org.

COVERED SPECIES

The requested permit is intended to authorize incidental take of the following species:

1. California tiger salamander (*Ambystoma californiense*) Sonoma County DPS – State Threatened
2. Sonoma sunshine (Blennosperma bakeri) – State Endangered
3. Burke's goldfields (*Lasthenia burkei*) – State Endangered
4. Sebastopol meadowfoam (*Limnanthes vinculans*) – State Endangered
5. Many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*) – State Endangered

These species are not the subject of rules and guidelines under Section 2112 and Section 2114 of the Fish and Game Code. The five species listed above are evaluated in Table A.

PROJECT LOCATION

The 1.26-acre project site comprises an undeveloped portion of APN 035-530-044, located along the northern side of Northpoint Parkway, just west of its intersection with Corporate Center Parkway (Figures 1 and 2). The project site is situated within Township 7 North, Range 8 West, in the southwestern ¼ of Section 28 and the northwestern 1/4 of Section 33 on the Sebastopol, California 7.5-minute U.S. Geological Survey quadrangle, and is centered at approximately 38.4160° North Latitude and 122.7561° West Longitude.

The project site can be accessed by traveling 1.4 miles west from U. S. Highway 101 on State Highway 12, then south for one mile on Stony Point Road, and then west 0.75 mile on Northpoint Parkway to Corporate Center Parkway.

Table A: State-Listed Species of Potential Occurrence on the Project Site

Species	CDFW Status[1]	Habitat	Assessment of Occurrence
Amphibians			
California tiger salamander *Ambystoma californiense* Sonoma County DPS	T	Grasslands, rangelands, and prairie habitats that include vernal pools or similar seasonal wetlands that typically pond water for three to four months per year.	Potential: No breeding habitat on the project site. The project site is within the 1.3-mile maximum dispersal distance from the breeding ponds and may serve as a movement and/or upland habitat.
Plants			
Sonoma sunshine *Blennosperma bakeri*	E	Valley and foothill grassland (mesic), vernal pools. Blooms February to April.	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Burke's goldfields *Lasthenia burkei*	E	Meadows and seeps (mesic), vernal pools. Blooms April to June.	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Sebastopol meadowfoam *Limnanthes vinculans*	E	Meadows and seeps, valley and foothill grassland, vernal pools. Blooms April to May	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Many-flowered navarretia *Navarretia leucocephala* ssp. *plieantha*	E	Vernal pools (volcanic ash)	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.

Source: *Name of Document* (LSA 2024).
[1] CDFW Status Definitions.
E - Endangered (legally protected)
T - Threatened (legally protected)

PROJECT DESCRIPTION

The proposed project will consist of construction of a parking lot that will connect with an existing parking lot located adjacent to the Becoming Independent facility (Figure 3). The parking lot will be paved asphalt with 60 parking places and will be 0.47 acre (20,470 square feet) in area. In addition, the project will include four bioretention basins totaling 0.04 acre (1,609 square feet) in area; the bioretention basins will drain via a 12-inch 42-foot pipe to an existing 72-inch storm drain running along the western edge of the project site (see Project Plans, Sheet 6; Appendix B). The project will also include installation of a concrete curb 9 inches in height on the outside edge of the parking area designed to exclude California tiger salamanders (CTS) and other small terrestrial wildlife from the parking area.

Stormwater Management System

The project will manage stormwater on-site to minimize changes in downstream conditions. As noted above, the water quality treatment measures will include four bioretention basins (see Project Plans, Sheet 5; Appendix B) to filter contaminants prior to discharge via the 12-inch 42-foot drainpipe connecting to a 72-inch storm water sewer (Figure 3). Detention basins will be constructed pursuant to City of Santa Rosa standards.

Stormwater from the unpaved non-native grassland areas will continue to flow to the existing on-site seasonal wetlands (Figure 3) which drain into the existing slightly elevated concrete drain inlets on the southwestern edge of the project site and just north of the northwest corner of the project site (Figure 3). Another storm water drain inlet surrounded by a rock apron is located just west of the Northpoint Parkway driveway into the Becoming Independent parking area (Figure 3). All these inlets drain to the existing 72-inch storm water sewer running along the western edge of the project site and ultimately southward into realigned segments of an intermittent blue-line creek that is tributary to the Laguna de Santa Rosa approximately 3 miles southwest of the study site. The Laguna de Santa Rosa drains northwestward to Mark West Creek and then the Russian River located approximately 9 miles northwest of the study site.

ENVIRONMENTAL SETTING

The project site occupies lands historically graded for runways and drainage on the former Naval Auxiliary Landing Field Santa Rosa (Figure 2). The project site comprises non-native grassland, small seasonal wetlands, and several storm water drainage structures (drain inlets) (Figure 4). The site is bounded by open areas dominated by non-native grassland to the west and north, by the Becoming Independent building and associated parking lots and paved/landscaped outdoor areas to the east, and Northpoint Parkway and commercial buildings to the south (Figure 4). The project site is relatively flat except for a graded berm and sidewalk along Northpoint Parkway; elevations range from approximately 102 to 107 feet above mean sea level.

There are two seasonal wetlands on the project site (Figure 4). These wetlands are jurisdictional features (field verified by the Corps) and as noted above, drain via three storm drain inlets to a 72-inch storm water sewer which ultimately drains to the Laguna de Santa Rosa.

Soils on the project site are mapped as Clear Lake clay, ponded, 0 to 2 percent slopes (soil map unit CfA) (Web Soil Survey, accessed April 13, 2023). Clear Lake Series soils comprise deep, poorly drained fine alluvial soils that formed in basin floors. Clear Lake soils are described as having a clay texture from the surface through a depth of 52 inches. Clear Lake clay soil is rated as 85 percent hydric. This soil map unit is described as containing minor components of Huichica, Wright, and Zamora soils; some of the soil colors observed better match some of these minor components rather than the Clear Lake clay. Some of the observed soils on the study site appear to contain imported fill materials, including gravel.

Vegetation Types

Vegetation on the project site is predominantly non-native grassland (Figure 4) dominated by non-native species, such as wild oats (*Avena barbata* and *A. fatua*), rattail six-weeks grass (*Festuca myuros*), harding grass (*Phalaris aquatica*), spring vetch (*Vicia sativa*), prickly lettuce (*Lactuca serriola*), and cut leaf geranium (*Geranium dissectum*). Various non-native ornamental landscape trees and shrubs are planted along Northpoint Parkway. In addition, there are two seasonal wetlands present on the project site (Figure 4); vegetation in these wetter locations includes Italian rye grass (*Festuca perennis*), seaside barley (*Hordeum marinum*), prickleseed buttercup (*Ranunculus muricatus*), common toad rush (*Juncus bufonius*), hyssop loosestrife (*Lythrum hyssopifolia*), and

semaphore grass (*Pleuropogon californicus*). A comprehensive plant list for the project site based on protocol plant surveys conducted in 2023 and 2024 is provided in Appendix C.

TAKE ANALYSIS

The proposed project includes converting approximately 0.470 acre (20,500 square feet) of non-native grassland into a paved parking lot and an additional 0.040 acre (1,609 square feet) into bioretention basins; total impacts equal 0.51 acre (22,215 square feet) (Table B).

Table B: Impacts

Habitat Impacts	Direct Impact Permanent (acres)	Temporary Impacts (acres)	Indirect Impact (acres)[1]	All Impacts (acres)
Upland	0.51	0.01	0.62	1.14
Wetland	0	0	0.09	0.09
Total	**0.51**	**0.01**	**0.71**	**1.23**

Source: LSA 2024.

[1] Indirect impacts include the remaining upland and seasonal wetland habitats on the project site but outside the project footprint

Temporary impacts to non-native grassland habitat associated with trenching for the placement of the 12-inch 42-foot drainpipe for the bioretention basins will be approximately 436 square feet.

Wetland and Upland Habitats

The proposed project will avoid all impacts to jurisdictional Waters of the United States and/or Waters of the State (Figure 3). The mapped wetlands shown on Figure 3 are based on a wetland delineation covering the project area that was field verified by the Corps on February 15, 2024 (Corps File No. SPN-2023-00355).

Permanent direct impacts will be within the non-native grassland habitat. A total of 0.51 acre of potential CTS upland habitat will be directly impacted by the parking lot and an additional 0.04 by the bioretention basins. No wetlands will be impacted. The approximate 0.71-acre area, north, west. and south of the direct project impact area will not be subject to permanent impacts; however, this area is considered to be indirectly impacted with respect to long-term habitat suitability for CTS.

California Tiger Salamander

CTS in grassland habitats with stock ponds, vernal pools, or other seasonal waterbodies that serve as breeding habitat. These salamanders spend most of the year underground in small mammal burrows, on the Santa Rosa Plain they primary use the burrows of Botta's pocket (*Thomomys bottae*) and emerge at the onset of the heavy winter rains to move into breeding pools.

There is no suitable breeding habitat within the boundaries of the project site or in the vicinity of the site. The wetlands on-site do not pond to the depths or for the time durations needed for successful CTS breeding. The burrows of Botta's pocket gophers on the project site provide potential upland habitat for CTS.

The site is within the normal maximum CTS dispersal distance of 1.3 miles from known breeding sites (Figure 5). The closest confirmed CTS breeding site is 0.63 mile west of the project site and the closest potential breeding habitat is 0.2 mile to the southwest (Figure 5). Given that the project is located within potential dispersal distance of a known/potential breeding sites, the project may affect CTS; however, the project site does not occur within designated critical habitat for this species.

Listed Plants

Botanical surveys following CDFW guidelines (CDFW 2018), including checking reference sites to confirm blooming, were conducted on the project site on April 5 and 7 and May 8, 2023, and April 11, 2024. The focus species of the botanical survey included Sonoma sunshine, Burke's goldfields, Sebastopol meadowfoam, and many-flowered navarretia. Known populations of Sonoma sunshine, Burke's goldfields, Sebastopol meadowfoam occur within 2 miles of the project site (Figure 6); however, none of these species was found on the project site and therefore, the proposed project will have no effect on these plants. Populations of many-flowered navarretia is not known to occur in the project vicinity (Figure 6) and this species was also not found on the project site during the botanical surveys. The botanical survey report is provided in Appendix C.

IMPACTS OF THE PROPOSED TAKING

California Tiger Salamander Sonoma County DPS

The project site provides potential upland dispersal habitat for CTS based on the site's location within 1.3 miles of potential and known breeding habitat (Figure 5), so there is potential for take of CTS as a result of project activities. The project will directly impact 0.51 acre of potential upland dispersal habitat. A total of 0.71 acre will also be indirectly impacted; indirect impacts could occur primarily as a result of a reduction of the area of potential dispersal habitat, as well as underground habitat by reducing pocket gopher populations in this area. The permanent placement of fill and modifications to drainage patterns within the project site could also alter hydrology or otherwise affect flows into or out of adjacent wetlands, potentially indirectly affecting adjacent habitat quality.

In addition to the loss of habitat, direct take of individuals through injury or mortality could result from ground disturbing activities and equipment operations in and around suitable habitat. For instance, individual CTS present could become trapped in gopher burrows if the weight of moving vehicles or equipment, or the placement of materials, collapses or seals such burrows. Equipment use resulting in ground disturbance, such as grading, blading, trenching, and excavating, could result in take by causing mortality or harm to adults in burrows. Adults also have the potential to be trapped in trenches created by construction activity, which could result in mortality through starvation, desiccation, or impairing an individual's ability to escape predation.

There could also be less direct effects on individual salamanders. Individuals dispersing from breeding sites to the north and west to upland habitat could be forced to disperse over longer distances to find a suitable location; however, this is unlikely because areas to the east and south of the project site are largely developed. The extra energy required for the longer dispersal could make individuals more susceptible to predation, vehicle strikes, exposure, and starvation, resulting in mortality. Additionally, construction noise, vibrations, and night-time construction lighting (if used)

could cause individuals to leave suitable habitat in and near work zones or could disrupt their ability to breed and/or forage. Movement or dispersal of CTS across the project site could be impeded by structures associated with the project. Affected individuals could be more susceptible to predation, exposure, or desiccation, resulting in mortality. Nonetheless, the proposed 9-inch curb around a portion of the proposed parking lot would restrict dispersing CTS from the parking area and therefore would be beneficial in reducing potential impacts to CTS from vehicles.

All of these potential impacts to individuals would be minimized through the conservation measures described below.

JEOPARDY ANALYSIS

The project is unlikely to jeopardize the continued existence of CTS. While some individuals may be taken and potential upland habitat would be permanently modified and/or degraded in certain areas, the project's effects on the species' ability to survive and reproduce are not significant after the application of the conservation strategies outlined in this document. The following section provides a detailed analysis of how the issuance of the ITP would not affect the continued existence of the CTS. The conclusion of no jeopardy considers the ability of CTS to survive and reproduce in the context of known population trends, known threats to the species, and reasonably foreseeable impacts to the species from other related projects and activities.

California Tiger Salamander

Known population trends

According to a status review conducted by CDFW in 2010, the number of CTS range-wide is unknown (Bolster 2010). Estimating their numbers is difficult because CTS spend most of their lives underground and are therefore hard to detect. In the absence of long-term monitoring data produced by a scientifically designed study, attempting to accurately estimate the total population size of CTS range-wide is not feasible. The available data suggest that most populations consist of relatively small numbers of breeding adults; breeding populations in the range of a few pairs up to a few dozen pairs are common, and numbers above 100 breeding individuals are rare.

CTS populations on the Santa Rosa Plain have been eliminated from much of their previous range due to habitat loss and fragmentation (USFWS 2016). Although it is not currently feasible to accurately determine CTS abundance on the Santa Rosa Plain, CDFW's evaluation of factors affecting CTS abundance indicates that populations on the Santa Rosa Plain continue to decline and this amphibian is likely to become an endangered species in the foreseeable future.

Known Threats

The 2010 CDFW status review identified the following primary threats to the species:

- habitat loss and fragmentation;
- hybridization with non-native tiger salamanders;
- predation and competition from non-native species;
- road-crossing mortality;
- agricultural practices (conversion to intensive agriculture, stock ponds, grazing, rodent control);

- mosquito abatement;
- proximity to urban areas;
- disease; and
- contaminants (pesticides, fumigants, fertilizers, etc.).

Implementation of the project would contribute to the threats of habitat loss and fragmentation, road crossing mortality, and proximity to urban areas. However, given the measures to minimize and mitigate for potential impacts to the California tiger salamander described herein, it is unlikely that the issuance of the ITP for the project would jeopardize the continued existence of CTS in the immediate project vicinity or on the Santa Rosa Plain

Reasonably Foreseeable Impacts on the Species from other Related Projects and Activities. The project site is within the urban growth boundary of Santa Rosa and is identified as a future development area in the Santa Rosa Plan Conservation Strategy (USFWS 2005). The area on the south and east of the project site is developed.

The project includes measures to minimize and mitigate potential impacts as described below. The project will not impact breeding habitat and will mitigate for the loss of upland habitat through the purchase of mitigation credits at an CDFW approved mitigation bank.

Conclusion. The proposed project will lead to a small reduction in upland habitat that is currently available to CTS. The proposed project could also lead to take of individual CTS located within the project area at the time of construction. Conservation measures described below will avoid or minimize the take of individual CTS to the maximum extent possible; compensatory mitigation measures described below will offset the loss of habitat through the purchase of mitigation credits at a CDFW approved mitigation bank. With implementation of these measures, it is unlikely that the issuance of the ITP for the proposed project would jeopardize the continued existence of CTS Sonoma County DPS in the immediate project area or throughout this species range on the Santa Rosa Plain.

AVOIDANCE AND MINIMIZATION MEASURES AND MITIGATION

General Avoidance and Minimization Measures

AMM 1: Vehicular/Equipment Operation and Maintenance

1. When working on the project all access will use of existing access routes, staging areas will be limited to the work site and/or adjacent paved areas and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. The boundaries of all new and existing access routes shall be clearly marked or flagged. Access routes will be located outside the on-site wetlands and non-native grassland habitat outside the project footprint.

2. All fueling and maintenance of vehicles and other mechanized equipment shall be conducted in designated areas located at least 100 feet away from any wetland habitat. Each designated fueling/maintenance area shall be protected by a containment barrier designed to prevent any spilled or leaked fuel or other contaminants from running into an aquatic habitat. All workers

shall be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.

3. All vehicles and other mechanized equipment used during construction shall be checked for oil, fuel, and coolant leaks prior to initiating work. Any equipment found to be leaking fluids shall not be used in or around aquatic habitat features.

4. The potential for wildfires shall be reduced by parking vehicles away from vegetation and by the use of shields, protective mats, and other fire prevention methods when welding, grinding, or conducting other activities that are likely to create a fire hazard. The construction site shall have adequate sources of water, shovels, and fire extinguishers available for immediate use. All vehicles and heavy equipment used on the site shall have on-board fire extinguishers.

5. During the dry season, vehicles shall never be parked or idled so that the undercarriage is in contact with vegetation.

6. In order to reduce the risk of spreading harmful pathogens into natural areas, vehicles and construction equipment that have been off-road in natural areas shall have their tires thoroughly cleaned (by manual scrubbing down or cleaning with a pressure washer) before the vehicle/equipment is allowed to be used in other natural areas. If the vehicle or equipment was operated in a creek or stream, the tires shall also be decontaminated by one of the following procedures:

    a. Allowing the tires to completely dry (for at least 24 hours) before being allowed use or entry in or in the vicinity of another creek or stream.

    b. Cleaning with a 5 percent bleach solution or 99 percent copper sulfate pentahydrate solution (3/4 teaspoon per gallon of water).

7. Vehicular cleaning work shall be conducted in self-contained work areas at least 100 feet from any aquatic habitat; wash water shall not be disposed of in any natural areas.

AMM 2: Work Area Maintenance/Hazardous Materials

1. Food, trash, and other solid wastes shall be disposed of in properly contained, covered refuse containers, and regularly removed from the various structures and facilities. Following construction, all trash and construction debris shall be removed from the work area.

2. Building material storage areas containing hazardous or potentially toxic materials shall have an impermeable membrane between the ground and the hazardous material and shall be bermed to prevent the discharge of pollutants to groundwater and storm water runoff.

3. Materials deleterious or toxic to fish and wildlife including, but not limited to, asphalt, tires, concrete, construction materials, treated wood, and creosote-containing materials must be stockpiled in bermed containment areas that are lined with an impermeable membrane and designed to hold 125 percent of the total capacity of stored materials. All such materials may not be stored within 100 feet from the edge of any wetland for more than 48 hours.

Contaminant absorbent materials shall be stored in each containment area. Water collected in containment areas shall be disposed of according to Federal, State, and local regulations.

4. An emergency response and cleanup plan shall be prepared prior to beginning work at the site. The plan shall detail the methods to be used to contain and clean up spills of petroleum products or other hazardous materials in the work area.

5. Containers for storage, transportation, and disposal of contaminated absorbent materials shall be provided in the project site. Petroleum products and contaminated soils shall be disposed of according to Federal, State, and local regulations.

AMM 3: Water Quality Management

1. A Storm Water Pollution Prevention Plan (SWPPP), prepared in accordance with the State Water Resources Control Board (SWRCB), National Pollutant Discharge Elimination System Construction General Permit, shall be implemented for all construction activities where required under SWRCB regulations. The SWPPP shall include Best Management Practices (BMPs) for controlling sediment, turbidity, and the release of other pollutants into aquatic habitats during construction.

2. Any concrete structures shall be poured in tightly sealed forms and shall not be allowed contact with surface waters until the cement has fully cured (minimum of 30 days). During that time, the poured concrete shall be kept moist and runoff from the concrete shall not be allowed to enter wetland habitats. Commercial sealants may be applied to the poured concrete surface in locations where the exclusion of water flow for a long period is difficult. If a sealant is used, water shall be excluded from the site until the sealant is dry and fully cured according to the manufacturer's specifications.

3. Water that contacts wet concrete and has a pH greater than 9.0 shall be pumped out and disposed of outside of wetland habitat.

4. No substances toxic to aquatic life shall be discharged or allowed to leach into wetland habitat. Every reasonable precaution to protect wetlands from pollution with fuels, oils, bitumens, calcium chloride, dust suppressants, and other harmful materials shall be implemented.

AMM 4: Worker Training

1. All operations, maintenance, and construction personnel shall receive training about special-status species potentially occurring in the project site before the start of ground disturbing activities.

2. All construction personnel shall receive pre-project training from an Approved Biologist about the sensitive nature of special-status species and their habitat potentially occurring in the vicinity of the construction site.

3. Training shall include the following: (a) descriptions of the sensitive species and habitat potentially occurring with work areas; (b) all routine measures required to protect the

species/Natural Community during work and the possible State and/or Federal penalties for not complying with these requirements; and (c) the requirement to stop all work and notify a supervisor or the Project Biologist if a special-status species is observed in the project site.

AMM 5: Notification Procedures

1. Operations, maintenance, and construction personnel shall report to their supervisor any observed incident of death or injury to a special-status species or damage to habitat. The supervisor shall immediately notify the Project Biologist.

2. Becoming Independent shall report to the CDFW, the following: (a) any incidence of observed or suspected take (harm, harassment, pursuit, hunting, shooting, wounding, killing, trapping, capture, collection, or any attempt to conduct these activities) of a listed animal species; (b) any other report of take or suspected take of a listed animal species not authorized under this project; and (c) any observed destruction or damage to a covered plant species population or its suitable habitat. The report shall be made to CDFW within 24 hours of the incident and shall include pertinent information, such as the date, time, location, species or habitat, and possible cause of the incident (if known).

AMM 6: General Site Disturbance Restrictions

1. Ground-disturbing activities shall be confined to the smallest area needed to complete the work. Project vehicles, especially heavy equipment, shall be limited to existing roadways whenever possible, especially when soils are moist.

2. After the construction work is completed, temporarily disturbed areas shall be restored to their original pre-project condition, including topography and vegetation. If seeding is necessary when restoring to previous condition, local native and noninvasive species seed mixes shall be used.

AMM 7: Erosion Control Measures

1. Disposal sites for removed materials and debris shall be located in off-site locations in a manner that prevents the disposed materials and debris from draining directly into wetland habitat. Standard construction BMPs and erosion control methods shall be used to ensure the material is contained over both the short and long term.

2. Erosion control and sediment detention devices (e.g., certified weed-free straw bales or silt fences) shall be in place during construction and following construction, as necessary to minimize fine sedimentation and siltation, and to detain sediment-laden water on site. These devices shall be placed at all locations where sediment input is likely to occur. A supply of erosion control materials shall be readily available to cover small sites that may become bare and to respond to sediment emergencies. Plastic monofilament mesh covering for straw wattles, erosion control blankets, or erosion control materials are prohibited for erosion control.

3. Sediment shall be removed from sediment controls once the sediment has reached one-third of the exposed height of the control. Sediment collected in these devices shall be disposed of at

approved disposal sites away from the collection area. Collection devices shall be inspected at least once a week and daily during storm events to ensure they are functioning properly. If a control measure does not function effectively, it shall be immediately repaired or replaced. Additional controls shall be installed as necessary.

4. All disturbed soils shall undergo erosion control treatment (e.g., temporary seeding and sterile straw mulch) prior to October 15 and following completion of construction work. Erosion control blankets shall be installed over disturbed soils on all gradients of over 30 percent.

5. Any stockpiles of soil used for fill material during construction shall be covered with a tarp or erosion control blanket and silt fences shall be installed to prevent soils from moving into area waterways. If a greater than 40 percent chance of rain is forecast within 24 hours, the project site shall be "rain proofed" with erosion control measures to ensure that no sediment or turbidity enters an aquatic habitat.

AMM 8: Vegetation Management Measures

1. Mechanical control methods, such as mowing, shall be used as an alternative to the application of herbicides whenever practicable in or near sensitive habitats and areas known to or likely to support special-status species, including seasonal wetlands.

2. Mass application of herbicides shall be avoided to the maximum extent practicable. Spot spraying or more localized applications shall be used instead.

3. Herbicide mixing shall be limited to areas not prone to runoff, such as concrete mixing/loading pads, disked soil in flat terrain, or graveled mixing pads.

4. The use of all herbicides shall comply with the requirements specified on the pesticide product labeling and Sonoma County regulations.

AMM 9: Wildlife Exclusion Fencing

1. Wildlife exclusion fencing shall be installed and maintained between project the work area and adjacent preserved habitat during all work activities (Figure 3). Exclusion fencing will consist of silt fabric, plywood, aluminum, or other CDFW-approved material; ERTEC[1] is a popular and effective brand of exclusion fencing often used for projects required to exclude CTS. The base of the fence will be buried a minimum of 6 inches in the ground to prevent animals from crawling under and be a minimum of 18 inches in height above ground. The fence will be pulled taut at each support to prevent folds or snags. Support poles will be located on the inside of the exclusion area. Exclusion fencing shall be inspected weekly and repaired immediately when damage is observed during construction work.

[1] ERTEC Environmental Systems: https://ertecsystems.com/.

Habitat-Specific Conservation Measures: Non-native Grassland and Seasonal Wetlands

AMM VPG 1: Buffer Criteria for Covered Development Activities

Wetland and non-native grassland habitats within the project site but outside the project footprint are considered to be indirectly impacted. All such indirect impacts shall be subject to the mitigation requirements under the Santa Rosa Plain Conservatio Strategy (USFWS 2005).

AMM VPG 2: Best Management Practices to be Implemented during Operation, Maintenance, and Construction Activities in and Adjacent to Preserved and Avoided Habitats

1. Biological Monitor

    a. An CDFW Approved Biologist shall monitor all initial project ground-disturbing activities to ensure that no unnecessary take of CTS or destruction of their habitat occurs. The Approved Biologist shall have the authority to stop all activities that may result in such take or destruction until appropriate corrective measures have been completed. The Approved Biologist shall immediately notify Becoming Independent of any unauthorized impacts; Becoming Independent shall report to CDFW within 24 hours of notification.

    b. The Approved Biologist shall provide instructions to all on-site construction personnel regarding the potential presence of CTS and measures required by law to avoid impacts to this species and their habitat, as well as the possible penalties for not complying with these requirements.

2. Habitat Protection During Work Activities

    a. Seasonal wetland habitat and non-native grassland areas adjacent to the immediate work area shall be isolated from the work area by wildlife exclusion fencing (Figure 3) prior to staging and construction/ground-disturbing activities.

    b. Wildlife exclusion fencing shall be installed and maintained between project work areas and adjacent preserved and avoided habitat during all work activities, as described above in AMM 9.

    c. The following activities are prohibited in the seasonal wetland and non-native grassland habitat: (a) alteration of existing topography or any other alteration or uses for any purposes, (b) erection of any new structures; (c) dumping, burning, and/or burying of rubbish, garbage, or any other wastes or fill materials; (d) building of any new roads or trails; (e) killing, removal, or alteration of any existing vegetation; (f) fire protection activities not required to protect existing structures in the project site except as provided for under Firebreak Construction and Maintenance (see below); and (g) use of pesticides or other toxic chemicals inconsistent with the product labeling.

3. Firebreak Construction and Maintenance

    a. Mowing to establish fuel breaks is preferred to disking. Mowing shall generally be conducted as late as possible in the spring, reducing the herbaceous cover to less than 2 inches in height.

    b. Where mowing is not practicable or will not provide an adequate fuel break, disking may be implemented under the following conditions:

        1) Prior to firebreak construction, “No Disk” zones shall be established for wetlands and areas with concentrations of fossorial mammal burrows. “No Disk” zones shall be permanently staked using metal fence posts placed at least 50 feet from the edge of the wetland. A post and sign shall be installed on either side of the wetland (“No Disk” zone) to warn the disk operator of the presence of habitat from either direction.

        2) At those points designated as “No Disk” zones, the disk operator shall raise the disk blades out of the soil and cross the “No Disk” zone. Not until the disk blades are beyond the “No Disk” sign on the opposite side of the sensitive habitat shall the operator be allowed to lower the blades, and in no case shall the operator allow the blades to touch the soil while in the “No Disk” zone.

        3) “No Disk” zones shall not be crossed if water is standing in a pool or if the soil is wet. In such cases, the operator must raise the disk blades and make a detour around the pool. Operators shall consult a site map, if available, to determine the best route around a wetland area.

        4) Where “No Disk” zones fuel levels in vernal pools and burrow areas may compromise a firebreak's effectiveness, the zone’s vegetation may be mowed. The clippings shall be removed by hand, with rakes, or with equipment that lifts the cuttings off the surface without removing the surface soil. Machines that vacuum the clippings shall not be used because the vacuum action may remove seeds or eggs on the soil surface. Precautions described above for general firebreak construction shall also be followed when mowing.

        5) “No Vehicle Access” areas shall also be identified. The purpose of this designation is to identify sensitive habitat areas where vehicle access shall be prohibited. Detour routes shall be identified on the site maps to allow tractors access the firebreak routes while avoiding the endangered species habitat. “No Vehicle Access” areas shall be identified in the field by temporary signs, arrows, and flagging placed at detour points, along dirt roads, and at road intersections at least 1 week prior to firebreak construction.

4. Dust Abatement

    a. The use of dust suppressants (other than water) shall be limited to those shown to have little or no toxicity to aquatic invertebrates and vegetation.

    b. Chemical dust suppressants shall only be used in a manner consistent with product label specifications.

c. Roads and other areas to be treated shall be tight-bladed or processed (cut 2 inches and watered, then laid back with gravel and rolled [if applicable]) to bring fines to the surface.

d. Chemical dust suppressants shall be applied such that the chemical agent remains on the treated area and does not leach into adjacent aquatic habitats.

e. Chemical dust suppressants shall not be applied in wet weather. Wet weather is defined as when there has been 0.25 inch of rain in a 24-hour period or when the National Weather Service 72-hour weather forecast indicates a 30 percent or greater potential for rain. Chemical dust suppressants shall also not be applied during a dry-out period of 48 hours after wet weather.

AMM VPG 3: Habitat Mitigation

Mitigation of potential CTS habitat subject to project indirect impacts will be mitigated at a 2: 1 ratio by the purchase of mitigation CTS credits at an CDFW approved conservation/mitigation bank.

Species-Specific Conservation Measures

Pursuant to the Santa Rosa Plain Conservation Strategy will implement species-specific conservation measures for CTs as follows:

AMM CTS 1: Measures to Avoid or Minimize Take of California Tiger Salamander

Prior to initiation of grading, the applicant will obtain CDFW approval to authorize incidental take of CTS. This approval will cover all activities to be carried out during construction, including the construction of associated infrastructure.

In order to avoid or minimize take, a series of protection measures and monitoring efforts will be implemented prior to and during grading and construction activities, including construction in or adjacent to identified habitat areas. A qualified biologist will supervise and/or implement all protection measures. All construction supervisors will be required to attend a training session with regard to the protection measures. All construction contracts will also expressly include language requiring compliance with the protection measures.

The following measures will be implemented during all project-related construction activities to minimize impacts to CTS and its habitat:

1. At least 15 days prior to the onset of activities, the applicant shall submit the name(s) and credentials of biologists who will conduct activities specified in the following measures ("Project Biologist"). No project activities shall begin until proponents have received written approval from CDFW that the Project Biologist is qualified to conduct the work.

2. Only the Project Biologist shall be allowed to handle CTS. The Project Biologist shall have the authority to halt construction work at any time in order to prevent harming CTS or when any of these avoidance and minimization measures have been violated. Work shall commence only when authorized by the Project Biologist. If work is purposefully stopped because of potential

harm to CTS, the Project Biologist shall advise CDFW by telephone or e-mail within the same day that the work is stopped.

3. Prior to the initiation of construction, the Project Biologist shall meet with construction supervisors and workers to provide basic information on CTS and discuss measures required to minimize impacts.

4. Prior to the start of construction, exclusion fencing will be installed along the northern, western, and southern boundaries of the project site. The fencing shall be designed to exclude adult and juvenile salamanders from entering the project site and shall be subject to the approval of CDFW prior to the rainy season before construction commences. Fencing shall be regularly inspected and maintained throughout the rainy season through the completion of construction work.

5. The Project Biologist shall train biological monitors designated by the construction contractor. Before the start of construction work each day, the biological monitors shall check for animals under any equipment such as vehicles and stored pipes within active construction zones that are fenced. The biological monitors shall check all excavated steep-walled holes or trenches greater than one foot deep for any animals. If CTS are observed within an active construction zone, the Project Biologist shall be notified immediately, and all work shall be halted, and machinery turned off immediately within 100 feet of the animal until the biologist has captured and removed CTS from the work area. CTS shall be trans-located to a CDFW pre-approved off-site location.

6. The Project Biologist shall be present during all initial ground-disturbing portions of the construction activities.

AMM CTS 2: Mitigation for Impacts to California Tiger Salamanders and their Habitat

Habitat Compensation Measures

Compensatory mitigation for project impacts will consist of preservation compensatory mitigation ratios prescribed in the Santa Rosa Plain Conservation Strategy. The Conservation Strategy is designed to promote the conservation of biological diversity and the preservation of Covered Species and the habitats on which they depend within the Santa Rosa Plain. Table C summarizes mitigation requirements for the Becoming Independent Parking Lot Project as defined by the Conservation Strategy.

The applicant proposes to meet the required mitigation for CTS by purchase of credits at a CDFW-approved mitigation/conservation bank. The following CDFW approved banks in Sonoma County offer CTS credits: Alton Lane, Altin Lane North, Carinalli-Todd Road, Hale, Hazel, Martin, Margaret West, and Swift/Turner banks.

The proposed project will require mitigation at a ratio of two acres of mitigation to every one acre of impact (2:1) for the whole 1.26-acre project site; a total of 2.46 acres (Table C)

Table C: Compensatory Mitigation Requirements for the Becoming Independent Project

Habitat	Project Impacts			Required Mitigation (2: 1 - mitigation: impacts)
	Direct Impact (acres)	Indirect Impact (acres)	Total	Total
Upland	0.51	0.62	1.14	2.28
Wetlands	0	0.09	0.09	0.18
Total (ac)	**0.51**	**0.71**	**1.23**	**2.46 acres**

Source: Santa Rosa Plain Conservation Strategy (2005).

MONITORING PLANS

The applicant proposes to satisfy mitigation acreage requirements through the purchase of mitigation credits at established mitigation/conservation banks. Therefore, no project-specific monitoring plans are required.

FUNDING SOURCES

The applicant proposes to satisfy mitigation acreage requirements through the purchase of mitigation credits at established mitigation/conservation banks. Therefore, no funding is required beyond the purchase of the mitigation credits.

CERTIFICATION

I certify that the information submitted in this application is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to suspension or revocation of this permit and to civil and criminal penalties under the laws of the State of California.

Luana Vaetoe, Executive Director
Becoming Independent; Applicant

Eric Lichtwardt, Associate/Senior Wildlife Biologist
LSA Associates, Inc.; Project Technical Consultant/Application Preparer

REFERENCES

Bolster, Betsy C. 2010. Report to the Fish and Game Commission: A Status Review of the California Tiger Salamander (*Ambystoma californiense*). Nongame Wildlife Program Report 2010-4. State of California, Natural Resources Agency, Department of Fish and Game, Sacramento, California.

California Department of Fish and Wildlife (CDFW). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife, Sacramento, California.

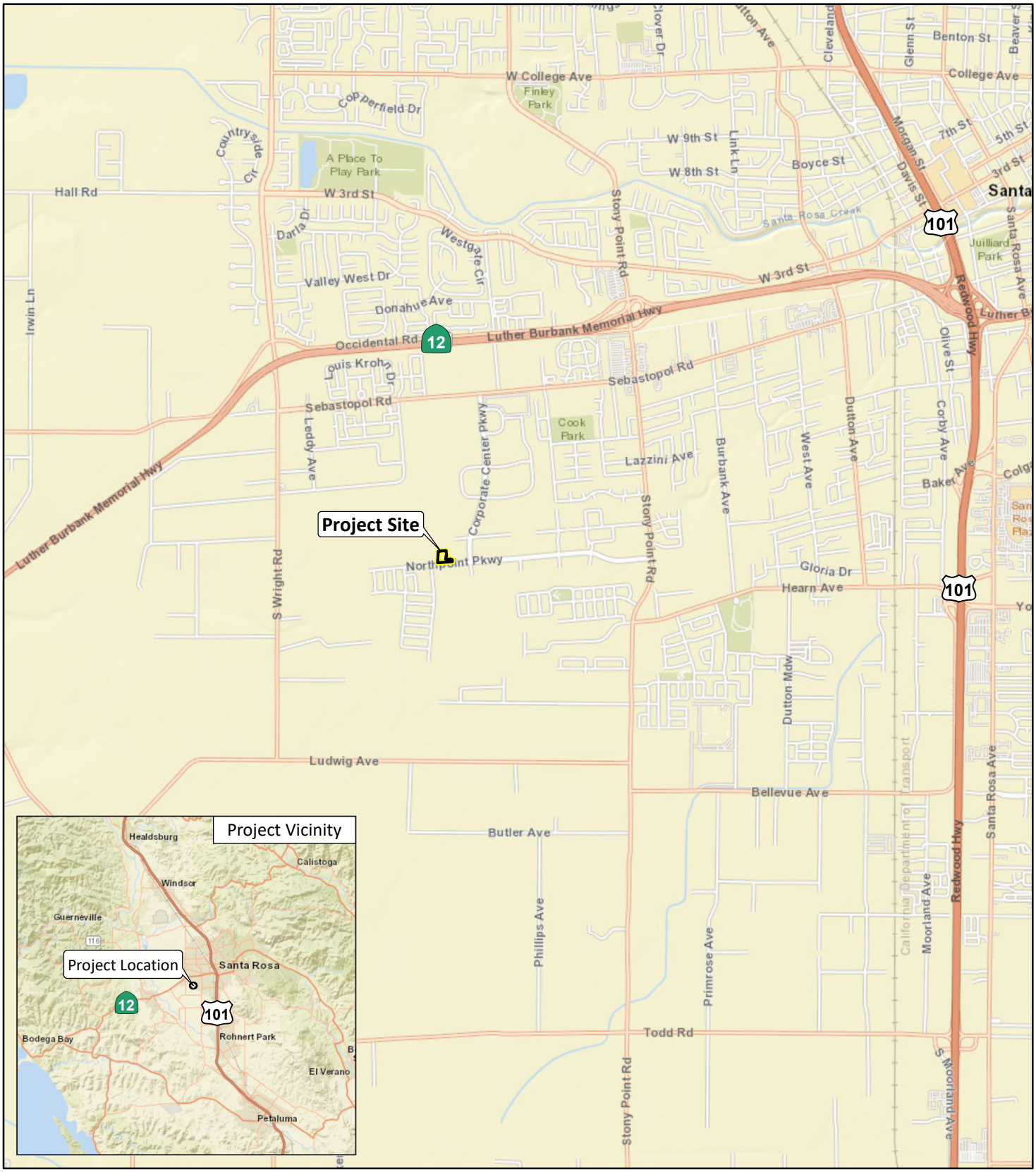
Natural Resources Conservation Service (NRCS). 2023. Web Soil Survey. Available online at: http://websoilsurvey.nrcs.usda.gov (accessed April 13, 2023).

United States Fish and Wildlife Service (USFWS). 2005. Santa Rosa Plain Conservation Strategy (Final). U.S. Fish and Wildlife Service, Sacramento, California.

United States Fish and Wildlife Service (USFWS). 2016. Recovery Plan for the Ranta 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*). Region 8, U.S. Fish and Wildlife Service, Sacramento, California.

APPENDIX A

FIGURES



LSA

LEGEND

Project Site

FIGURE 1

N

0 1500 3000

FEET

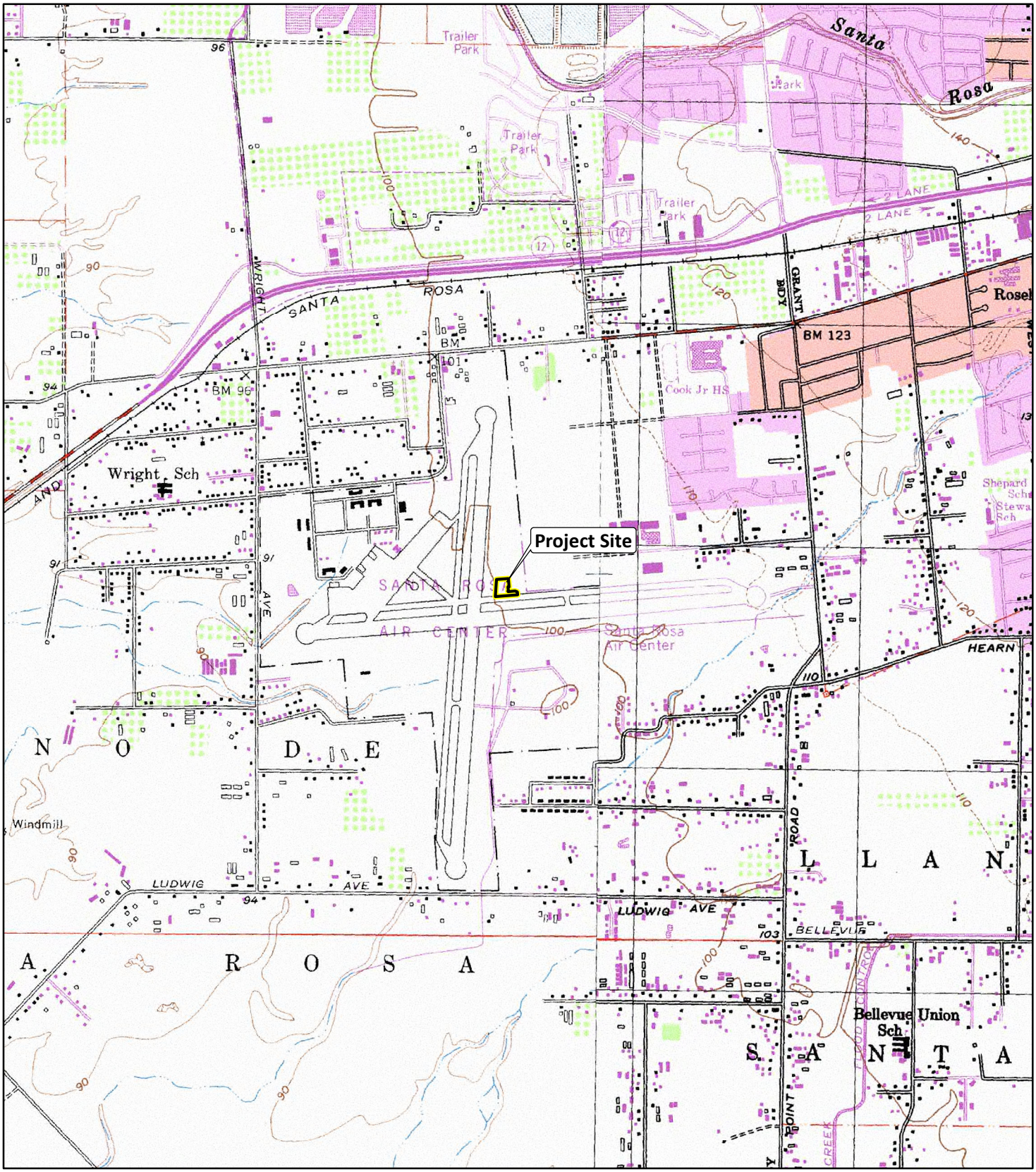
Becoming Independent

Santa Rosa, Sonoma County, California

Project Site and Regional Location

SOURCE: Esri World Street Map (2023).

I:\2023\20230971\GIS\MXD\ITP\Figure 1_Project Site and Regional Location.mxd (7/16/2024)



LSA

LEGEND

Project Site

FIGURE 2

N

0 1000 2000

FEET

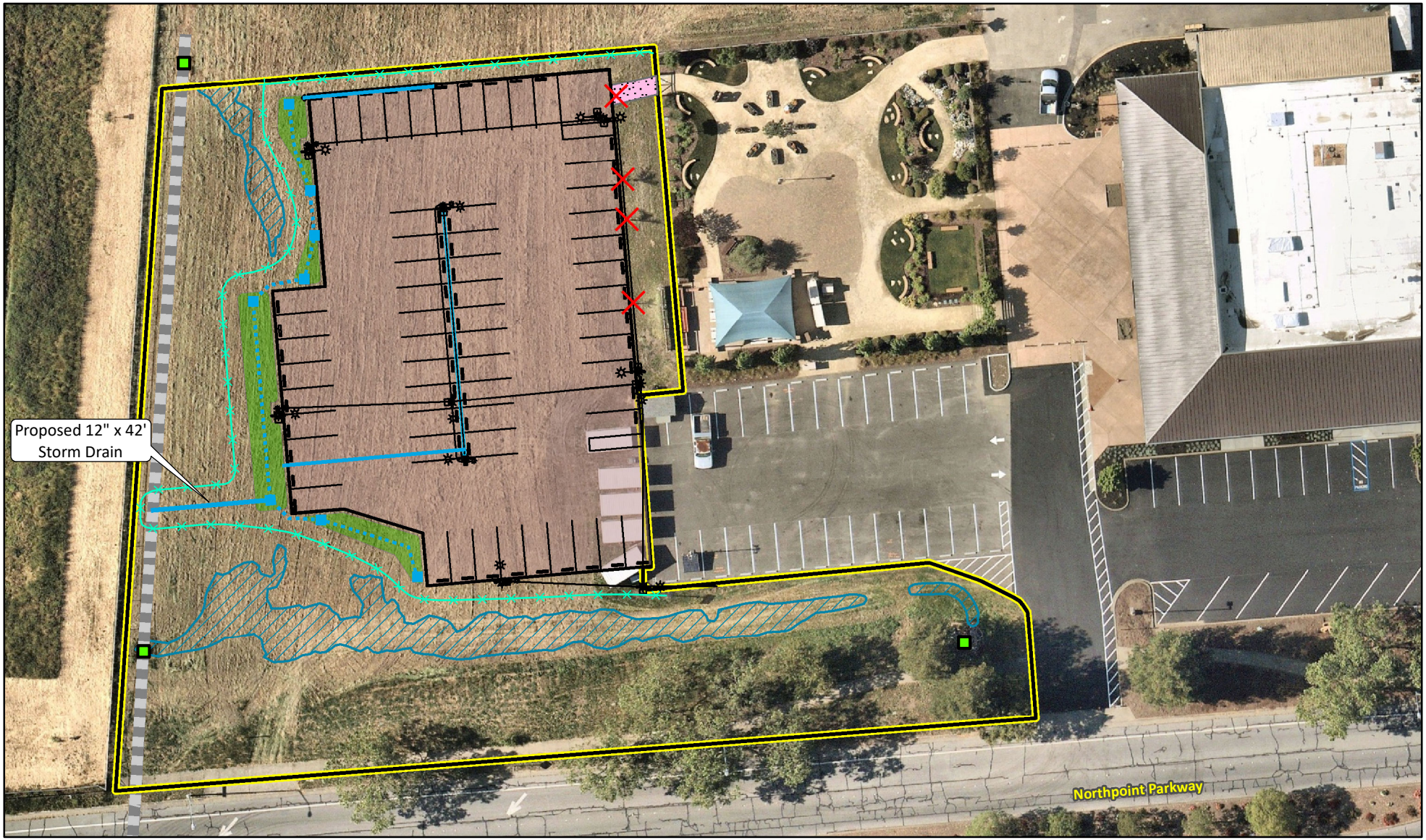
Becoming Independent

Santa Rosa, Sonoma County, California

Project Site Location

SOURCE: USGS 7.5-minute Topo Quads - *Sebastopol, Calif.* (1980) and *Santa Rosa, Calif.* (1994).

I:\2023\20230971\GIS\MXD\ITP\Figure 2_Project Location.mxd (7/16/2024)



LSA

FIGURE 3

LEGEND

Project Site (1.26 acres)

Existing Seasonal Wetlands

Existing Storm Water Drain Inlet

Existing 72-inch Storm Sewer

Proposed Project

Impervious Surface (0.47 ac)

Bioretention Basin (0.04 ac)

Decomposed Gravel Sidewalk (<0.01 ac)

Proposed Storm Drain Network

Wildlife Exclusion Fence
(Temporary during construction)

Tree to be Removed

N

0 25 50
FEET

Becoming Independent
Santa Rosa, Sonoma County, California

Proposed Project

SOURCE: Nearmap (05/2022).

I:\2023\20230971\GIS\MXD\ITP\Figure 3_Proposed Project.mxd (7/17/2024)

LSA

FIGURE 4

LEGEND

Project Site (1.26 acres)

Existing Storm Water Drain Inlet

Cover Types

Non-native Grassland (1.05 ac)

Ornamental Trees (0.09 ac)

Seasonal Wetland (0.09 ac)

Developed (0.03 ac)

Project Direct Impacts

Permanent Impact (0.51 ac)

Temporary Impact (0.01 ac)

Tree to be Removed

N

0 25 50

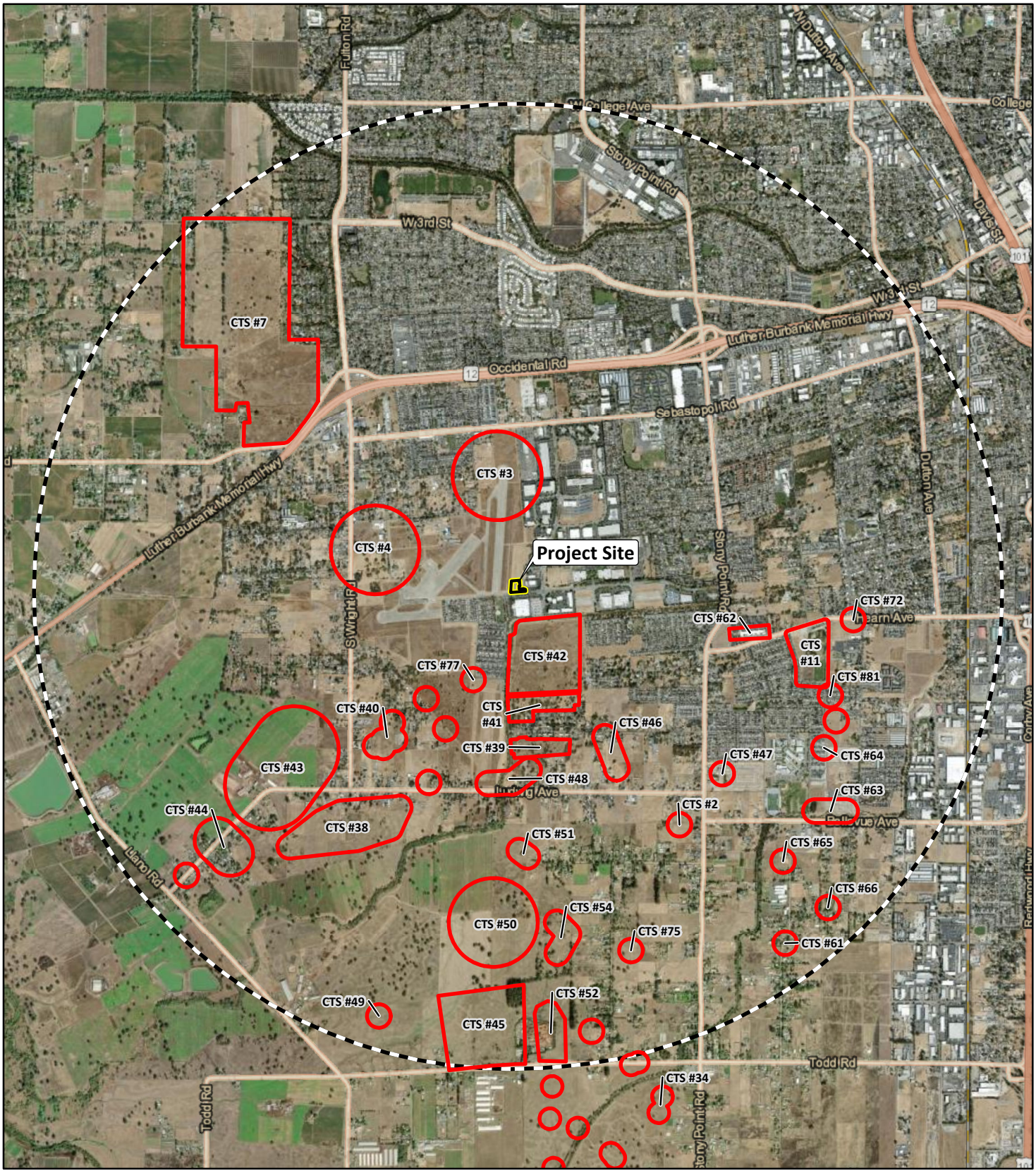
FEET

SOURCE: Nearmap (05/2022).

Becoming Independent
Santa Rosa, Sonoma County, California

Cover Types and Features

I:\2023\20230971\GIS\MXD\ITP\Figure 4_Cover Types and Features.mxd (7/17/2024)



LSA

LEGEND

- Project Site
- 2-mile Buffer of Project Site
- California Tiger Salamander (*Ambystoma californiense*) pop. 3

0 1500 3000
FEET

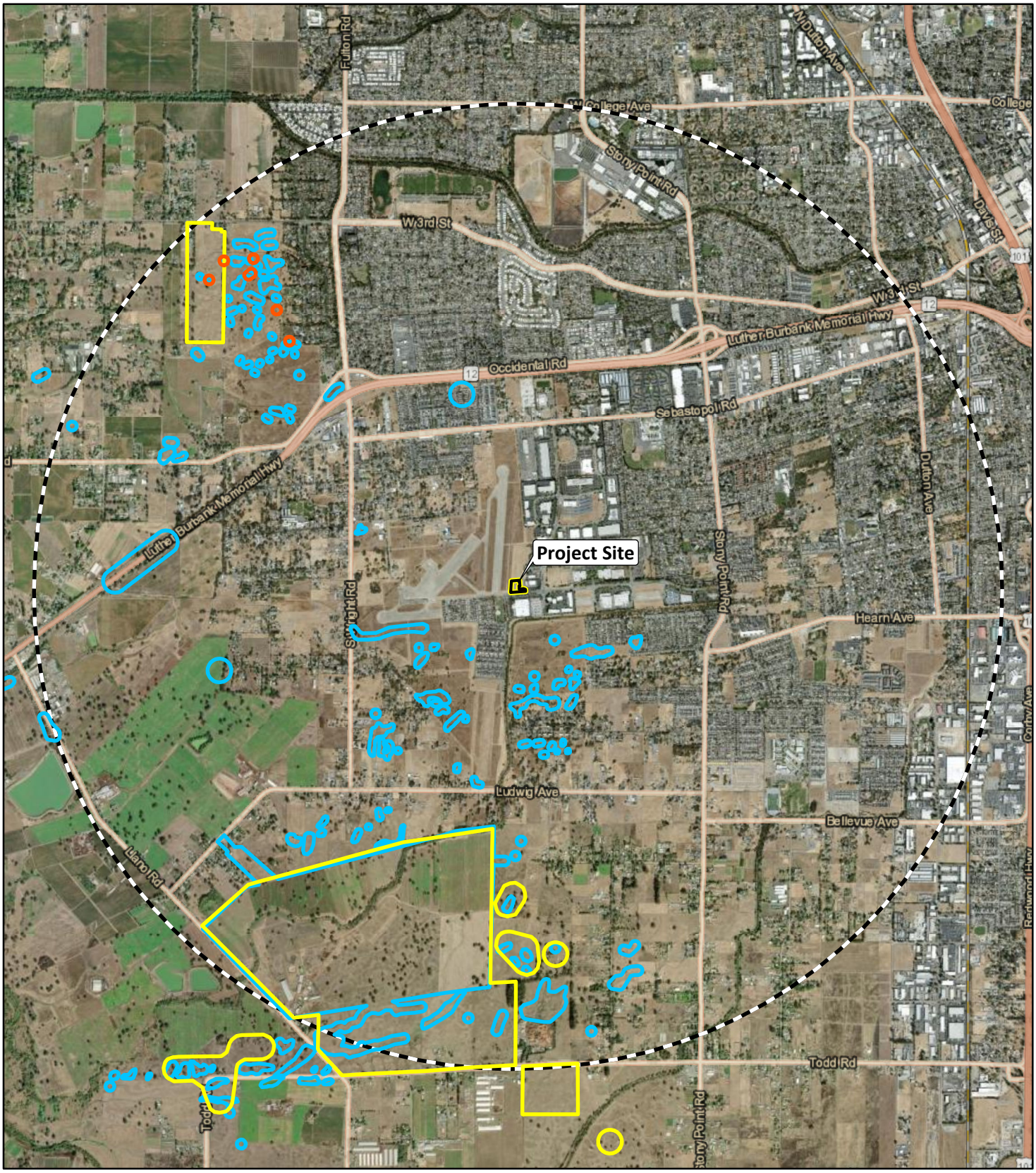
FIGURE 5

Becoming Independent
Santa Rosa, Sonoma County, California

California Tiger Salamander
Occurrences in the Project Vicinity

SOURCE: CDFW CNDDB (06/2024); Esri World Imagery (Maxar 10/2023).

I:\2023\20230971\GIS\MXD\ITP\Figure 5_CTS Occurrences in the Project Vicinity.mxd (7/16/2024)



LSA

Project Site

2-mile Buffer of Project Site

State Listed Plant Species Occurrences

Sonoma Sunshine (*Blennosperma bakeri*)

Burke's Goldfields (*Lasthenia burkei*)

Sebastopol Meadowfoam (*Limnanthes vinculans*)

N

0 1500 3000

FEET

SOURCE: CDFW CNDDB (06/2024); Esri World Imagery (Maxar 10/2023).

I:\2023\20230971\GIS\MXD\ITP\Figure 6_State Listed Plant Occurrences in the Project Vicinity.mxd (7/16/2024)

FIGURE 6

Becoming Independent
Santa Rosa, Sonoma County, California

State Listed Plant Occurrences
in the Project Vicinity

APPENDIX B

PROJECT PLANS

(Provided in a separate attachment)

APPENDIX C

BOTANICAL SURVEY REPORT

CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

July 19, 2024

Luana Vaetoe, Executive Director
Becoming Independent
1455 Corporate Center Parkway
Santa Rosa, CA 95407

Subject: Botanical Survey Results for the Becoming Independent Parking Lot Project
Santa Rosa, Sonoma County, California

Dear Ms. Vaetoe:

This letter report summarizes the results of a botanical surveys for the Becoming Independent Parking Lot Project located at 1455 Corporate Center Parkway in Santa Rosa, Sonoma County, California (Figure 1). Protocol-level rare plant surveys were conducted in accordance with the Santa Rosa Plain Conservation Strategy (Conservation Strategy); the Conservation Strategy was created as a long-term conservation program to mitigate for potential adverse effects on federally listed species due to future development on the Santa Rosa Plain. The project site is within the Conservation Strategy's urban growth boundary and is designated as a future development area; however, the project site is within an area that may support rare plant habitat.

METHODS

Focused surveys for the four plant species covered by the Conservation Strategy – Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vineculans*), Burke's goldfields (*Lasthenia burkei*), and many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*) – were conducted during the normal blooming periods for the target species in 2023 and 2024, as summarized in Table A. LSA botanists surveyed the entirety of the project area in accordance with the Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain*[1] and CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (2018).[2] All plant species were identified to a sufficient taxonomic level necessary to determine whether or not they have special status. A full list of species observed within the project

1 United States Fish and Wildlife Service (USFWS). 2005. *Santa Rosa Plain Conservation Strategy*. Available online at: https://www.fws.gov/sites/default/files/documents/1-Santa-Rosa-Plain-Conservation-Strategy-Main%20Body-508.pdf (accessed July 31, 2023).

2 California Department of Fish and Wildlife (CDFW). 2018. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.* State of California, California Natural Resource Agency, Department of Fish and Wildlife. March 20.

157 Park Place, Pt. Richmond, California 94801 510.236.6810 www.lsa.net

area is included as an attachment to this report. Names of plant species are consistent with The Jepson Manual[3] and the Jepson Online Interchange for California Floristics (Jepson eFlora).[4]

Table A: Summary of Surveys Conducted

Date	Personnel	Survey Focus
April 5 & 7, 2023	Anna Van Zuuk and Jennifer Roth	Sonoma sunshine and Sebastopol meadowfoam
May 8, 2023	Anna Van Zuuk and Hannah de la Calle	Sebastopol meadowfoam and Burke's goldfields
April 11, 2024	Anna Van Zuuk	Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields

EXISTING CONDITIONS

LSA identified one natural community and two semi-natural communities on site: seasonal wetlands, non-native grasslands, and ornamental landscaping (Figure 2). A full list of plant species observed on the site is included as an attachment to this report.

Non-Native Grassland

The majority of the project site consists of non-native grasslands dominated by wild oat species (*Avena* spp.), brome species (*Bromus* spp.), and non-native perennial bunch grasses including orchard grass (*Dactylis glomerata*) and Harding grass (*Phalaris aquatica*). This species composition meets the definition of wild oats and annual brome grasslands (Avena spp. – Bromus spp. Herbaceous Semi-Natural Alliance) in the *Manual of California Vegetation, Second Edition.*[5] Other non-native, ruderal species are present in this community including seaside barley (*Hordeum marinum*), Italian ryegrass (*Festuca perennis*), chicory (*Cichorium intybus*), bristly ox-tongue (*Helminthotheca echioides*), wild radish (*Raphanus sativus*), rabbitsfoot grass (*Polypogon monspeliensis*), vetch species (*Vicia* spp.), prostrate knotweed (*Polygonum aviculare*), curly dock (*Rumex crispus*) prickly lettuce (*Lactuca serriola*), and English plantain (*Plantago lanceolata*).

Seasonal Wetland

Small areas dominated by hydrophytic, and facultative vegetation are present within the greater non-native grassland area. These areas collect local runoff and drain into the Santa Rosa stormwater system. Typical vegetation observed in these areas includes semaphore grass (*Pleuropogon californicus*), seaside barley, Italian ryegrass, hyssop loosestrife (*Lythrum hyssopifolia*), common

[3] Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, editors. 2012. The Jepson Manual: Vascular Plants of California, Second Edition. University of California Press, Berkeley, California.

[4] Jepson Flora Project (eds.). 2023. Jepson eFlora. Website: ucjeps.berkley.edu/eflora/ (accessed August 2, 2023).

[5] Sawyer, J.O., T. Keeler-Wolf, and J. Evens. 2009. *A Manual of California Vegetation,* Second Edition. California Native Plant Society, Sacramento, California.

toad rush (*Juncus bufonius*), tall flatsedge (*Cyperus eragrostis*), and pricklefruit buttercup (*Ranunculus muricatus*).

Ornamental Landscaping

Ornamental landscaping is present along the sidewalk on the north side of Northpoint Parkway and surrounding the existing Becoming Independent community garden. The landscaping contains a variety of tree, shrub, and forb species including London plane tree (*Platanus* x *hispanica*), callery pear (*Pyrus calleryana*), coast redwood (*Sequoia sempervirens*), queen palm (*Syagrus romanzoffiana*), Chinese fringe flower (*Loropetalum chinense*), and blue fescue (*Festuca glauca*), among others.

RESULTS

No Sonoma sunshine, Sebastopol meadowfoam, Burke's goldfields, or many-flowered navarretia plants were detected during focused surveys conducted during their respective blooming periods. All species, including site visits to nearby reference populations, are discussed further below.

Sonoma Sunshine

Sonoma sunshine is federally listed as endangered, state listed as endangered, and has a CNPS rank of 1B.1 (rare, threatened, or endangered in California and elsewhere). This is an annual herb that is found on the grassy margins of swales and vernal pools in valley grasslands from 65 – 135 feet in elevation and typically blooms from February – April. Sonoma sunshine is a California native endemic (limited) to the State.

LSA visited the Alton North Conservation Bank, located south of the project area, on April 5 and May 8, 2023, and again on April 11, 2024, to observe the phenological development of a known population of Sonoma sunshine prior to surveying the project area. Thousands of Sonoma sunshine plants were observed in bloom at this location during the April 2023 visit, easily distinguished from the more common species, common stickyseed (*Blennosperma nanum*), by its leaves (fewer and longer lobes), red stigma of ray flowers, and overall robustness. All wetlands at this conservation bank contained varying levels of standing water at the time of the survey April 2023 survey, ranging from 6 – 24 inches in depth, and plants were observed throughout the shallower pools from edge to edge. This species was also observed in fruit during the May 2023 visit and the April 2024 visit, at which time pools were dry and plants were largely desiccated and dehiscing. During the April 2024 visit approximately 5 percent of plants were still in bloom, with the remainder of plants in fruit.

No occurrences of Sonoma sunshine were detected within the project area; no *Blennosperma* species were observed.

Sebastopol Meadowfoam

Sebastopol meadowfoam is federally listed as endangered, state listed as endangered, and has a CNPS rank of 1B.1 (rare, threatened, or endangered in California and elsewhere). This species is an annual herb that is typically found in wet meadows and vernal pools less than 1,000 feet in elevation

and blooms from April – May. Sebastopol meadowfoam is a California native endemic (limited) to the State.

LSA visited the Alton North Conservation Bank, located south of the project area, on April 5 and May 8, 2023, and again on April 11, 2024, to observe the phenological development of a known population of Sebastopol meadowfoam prior to surveying the project area. Only a handful of Sebastopol meadowfoam plants were observed in a vegetative state during the April 2023 visit, positively identified based on leaf morphology (3-5 leaflets, largely entire, with lower leaves entire and conspicuously spatulate). In contrast, the locally common white meadowfoam (*Limnanthes alba*) and common meadowfoam (*Limnanthes douglasii*) have pinnately lobed leaves with 5 – 11 or 5 – 13 leaflets, respectively. All plants are located in one pool, designated pool 40, on the northern boundary of the conservation bank adjacent to Alton Lane; this pool contained roughly 20 inches of standing water. Approximately 80 - 100 plants were observed blooming in this pool during the May 2023 visit; the pool was dry at that time. Approximately 50 blooming plants were observed during the April 2024 visit; the pool contained 1 – 4 inches of standing water during this survey.

No occurrences of Sebastopol meadowfoam were detected within the project area; no *Limnanthes* species were observed.

Burke's Goldfields

Burke's goldfields are federally listed as endangered, state listed as endangered, and have a CNPS rank of 1B.1 (rare, threatened, or endangered in California and elsewhere). This species is an annual herb that is found in wet meadows and vernal pools in foothill woodlands less than 1,640 feet in elevation and typically bloom from April – June. Burke's goldfields is a California native endemic (limited) to the State.

LSA visited the Sonoma County Airport Consolidated Mitigation Area (SACMA), located northwest of the project area, on May 8, 2023, and again on April 11, 2024, to observe the phenological development of a known population of Burke's goldfields prior to surveying the project area. Thousands of Burke's goldfields plants were observed in late-stage bloom at this location during the May 2023 visit; a similar number of plants were observed in a largely vegetative state (approximately 5 percent of plants blooming) during the April 2024 visit. Plants were positively identified by the presence of free phyllaries (leaf-like structures subtending a flowerhead), its pappus (one long awn and many short scales), and its generally pinnately divided leaf lobes. In contrast, other more common species of goldfields such as smooth goldfields (*Lasthenia glaberrima*), California goldfields (*Lasthenia californica*), and Fremont's goldfields (*Lasthenia fremontii*), which also occur in Sonoma County vernal pools, have fused phyllaries or pappus with more than one awn. All wetlands at this mitigation area were dry at the time of the May 2023 survey, and plants were observed in rings around the edges of pools. Approximately two-thirds of pools still contained standing water at the time of the April 2024 survey.

No occurrences of Burke's goldfields were detected within the project area; no *Lasthenia* species were observed.

Many-Flowered Navarretia

Many-flowered navarretia is federally listed as endangered, state listed as endangered, and has a CNPS rank of 1B.2 (rare, threatened, or endangered in California and elsewhere). This species is an annual herb that is found in vernal pools in yellow pine forests from 2,625 – 3,610 feet in elevation and typically blooms from April – June. Many-flowered navarretia is a California native endemic (limited) to the State.

Many-flowered navarretia is endemic to Lake and Sonoma counties. The nearest CNDDB record (Occurrence No. 9) is located near Sanders Road, approximately 0.53 mile north of the project area. This occurrence is the only recorded occurrence of this species on the Santa Rosa Plain; it was last observed in 1998 and is presumed extant.

No occurrences of many-flowered navarretia were detected within the project area; no *Navarretia* species were observed.

If you have any questions, please contact me at (916) 844-2983 or via email at anna.vanzuuk@lsa.net or Eric Lichtwardt at (510) 376-5694 or email at eric.lichtwardt@lsa.net.

Sincerely,

LSA Associates, Inc.

Anna Van Zuuk
Biologist/Botanist

Attachment: List of Plant Species Observed
Figure 1: Regional Location
Figure 2: Vegetation Communities and Land Cover Types

PLANT LIST

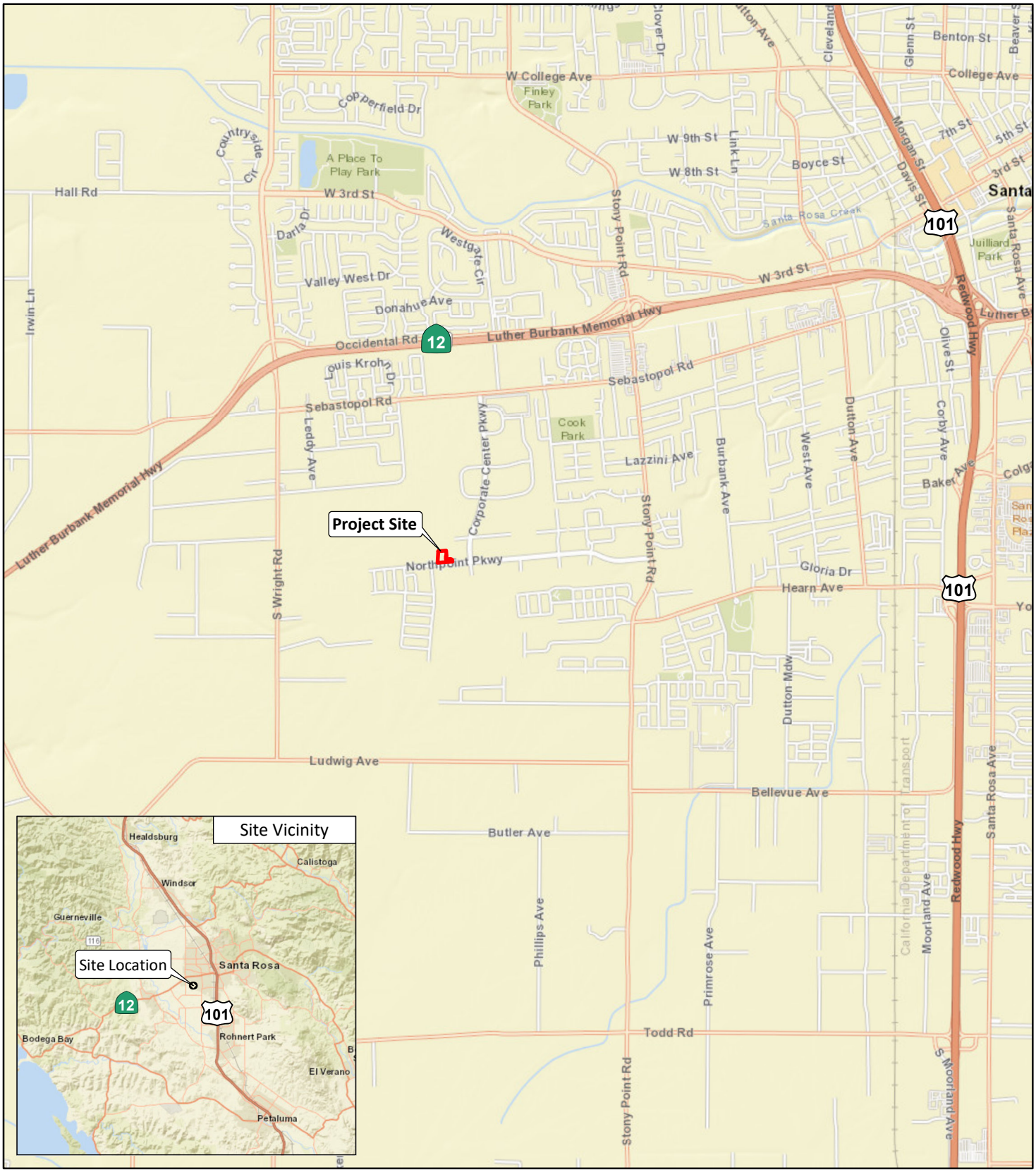
Renew Urban - LSA Project No. 20230971

Scientific Name	Common Name	Family	Native?	Cal-IPC	Botanical Survey Dates [1] 4/7/2023	[2] 5/10/2023	[3] 4/11/2024
Avena barbata	Slender oat	Poaceae	N	Moderate	X	X	X
Avena fatua	Wild oat	Poaceae	N	Moderate	X	X	X
Brassica nigra	Black mustard	Brassicaceae	N	Moderate	X	X	
Brassica rapa	Common mustard	Brassicaceae	N	Limited		X	
Briza minor	Little rattlesnake grass	Poaceae	N		X	X	X
Bromus catharticus	Rescue grass	Poaceae	N			X	
Bromus diandrus	Ripgut brome	Poaceae	N	Moderate		X	X
Bromus hordeaceus	Soft chess	Poaceae	N	Limited		X	X
Calendula officinalis	Pot marigold	Asteraceae	N				X
Carduus pycnocephalus	Italian thistle	Asteraceae	N	Moderate	X		X
Chenopodium album	Lamb's quarters	Chenopodiaceae	N		X	X	
Cichorium intybus	Chicory	Asteraceae	N			X	X
Convolvulus arvensis	Field morning glory	Convolvulaceae	N			X	X
Cynodon dactylon	Bermuda grass	Poaceae	N	Moderate		X	X
Cyperus eragrostis	Tall flatsedge	Cyperaceae	Y		X	X	X
Dactylis glomerata	Orchard grass	Poaceae	N	Limited			X
Daucus carota	Queen Anne's lace	Apiaceae	N		X	X	X
Downingia concolor	Spotted throat downingia	Campanulaceae	Y		X	X	
Epilobium brachycarpum	Tall annual willowherb	Onagraceae	Y			X	
Erodium cicutarium	Red stemmed filaree	Geraniaceae	N	Limited		X	
Erodium moschatum	White stemmed filaree	Geraniaceae	N			X	X
Festuca glauca	Blue fescue	Poaceae	N		X	X	
Festuca microstachys	Small fescue	Poaceae	Y		X	X	X
Festuca myuros	Rattail sixweeks grass	Poaceae	N	Moderate	X	X	X
Festuca perennis	Italian ryegrass	Poaceae	N	Moderate	X	X	X
Foeniculum vulgare	Sweet fennel	Apiaceae	N	Moderate		X	X
Geranium dissectum	Cutleaf geranium	Geraniaceae	N	Limited	X		X
Helminthotheca echioides	Bristly ox-tongue	Asteraceae	N	Limited	X	X	X
Hemizonia congesta ssp. lutescens	Hayfield tarweed	Asteraceae	Y			X	X
Heterotheca grandiflora	Telegraph weed	Asteraceae	Y		X	X	
Hirschfeldia incana	Short podded mustard	Brassicaceae	N	Moderate	X	X	X
Hordeum marinum	Seaside barley	Poaceae	N		X	X	X
Hordeum murinum	Foxtail barley	Poaceae	N	Moderate	X	X	X
Hypochaeris glabra	Smooth cats ear	Asteraceae	N	Limited	X	X	
Hypochaeris radicata	Hairy cats ear	Asteraceae	N	Moderate		X	X
Juncus bufonius	Common toad rush	Juncaceae	Y			X	X
Kickxia spurina	Fluellin	Plantaginaceae	N			X	
Lactuca saligna	Narrow leaved wild lettuce	Asteraceae	N		X	X	
Lactuca serriola	Prickly lettuce	Asteraceae	N		X	X	
Lamium purpureum	Purple dead nettle	Lamiaceae	N		X	X	X

PLANT LIST

Renew Urban - LSA Project No. 20230971

Scientific Name	Common Name	Family	Native?	Cal-IPC	Botanical Survey Dates [1] 4/7/2023	[2] 5/10/2023	[3] 4/11/2024
Lepidium didymum	Lesser swine cress	Brassicaceae	N		X	X	
Loropetalum chinense	Chinese fringe flower	Hamamelidaceae	N		X	X	X
Lotus sp.	Lotus	Fabaceae			X	X	
Lupinus bicolor	Miniature lupine	Fabaceae	Y		X		X
Lysimachia arvensis	Scarlet pimpernel	Myrsinaceae	N		X		
Lythrum hyssopifolia	Hyssop loosestrife	Lythraceae	N	Limited		X	X
Madia gracilis	Grassy tarweed	Asteraceae	Y		X	X	
Malva parviflora	Cheeseweed mallow	Malvaceae	N			X	
Malvella leprosa	Alkali mallow	Malvaceae	Y		X	X	
Medicago orbicularis	Round leafed medick	Fabaceae	N			X	
Medicago polymorpha	Bur medic	Fabaceae	N	Limited		X	X
Phalaris aquatica	Harding grass	Poaceae	N	Moderate			X
Plantago lanceolata	English plantain	Plantaginaceae	N	Limited		X	X
Platanus x hispanica	London plane tree	Platanaceae	N		X	X	X
Pleuropogon californicus	Semaphore grass	Poaceae	Y		X	X	X
Poa annua	Annual blue grass	Poaceae	N			X	
Polygonum aviculare	Prostrate knotweed	Polygonaceae	N			X	
Polypogon interruptus	Ditch beard grass	Poaceae	N		X	X	
Polypogon monspeliensis	Rabbitsfoot grass	Poaceae	N	Limited		X	
Pseudognaphalium luteoalbum	Jersey cudweed	Asteraceae	N			X	
Pyrus calleryana	Callery pear	Rosaceae	N		X	X	X
Ranunculus californicus	California buttercup	Ranunculaceae	Y				X
Ranunculus muricatus	Pricklefruit buttercup	Ranunculaceae	N		X	X	X
Raphanus sativus	Wild radish	Brassicaceae	N	Limited	X	X	X
Rumex crispus	Curly dock	Polygonaceae	N	Limited		X	X
Senecio vulgaris	Common groundsel	Asteraceae	N		X	X	
Sequoia sempervirens	Coast redwood	Cupressaceae	Y		X	X	X
Sonchus oleraceus	Common sowthistle	Asteraceae	N			X	X
Spergularia rubra	Purple sand spurry	Caryophyllaceae	N		X	X	
Syagrus romanzoffiana	Queen palm	Arecaceae	N		X	X	X
Taraxacum officinale	Dandelion	Asteraceae	N			X	X
Tragopogon porrifolius	Purple salsify	Asteraceae	N			X	
Trifolium subterraneum	Subterranean clover	Fabaceae	N				X
Veronica peregrina	Neckweed	Plantaginaceae	Y		X	X	X
Vicia sativa	Spring vetch	Fabaceae	N			X	X
Vicia villosa	Winter vetch	Fabaceae	N			X	
Wyethia glabra	Smooth mule ears	Asteraceae	Y				X



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LEGEND

Project Site

FIGURE 1

N

0 1500 3000

FEET

SOURCE: Esri World Street Map (2023).

I:\20230571\GIS\MXD\Delineation\Figure 1_Regional Location.mxd (8/4/2023)

Becoming Independent

Santa Rosa, Sonoma County, California

Project Site and Regional Location

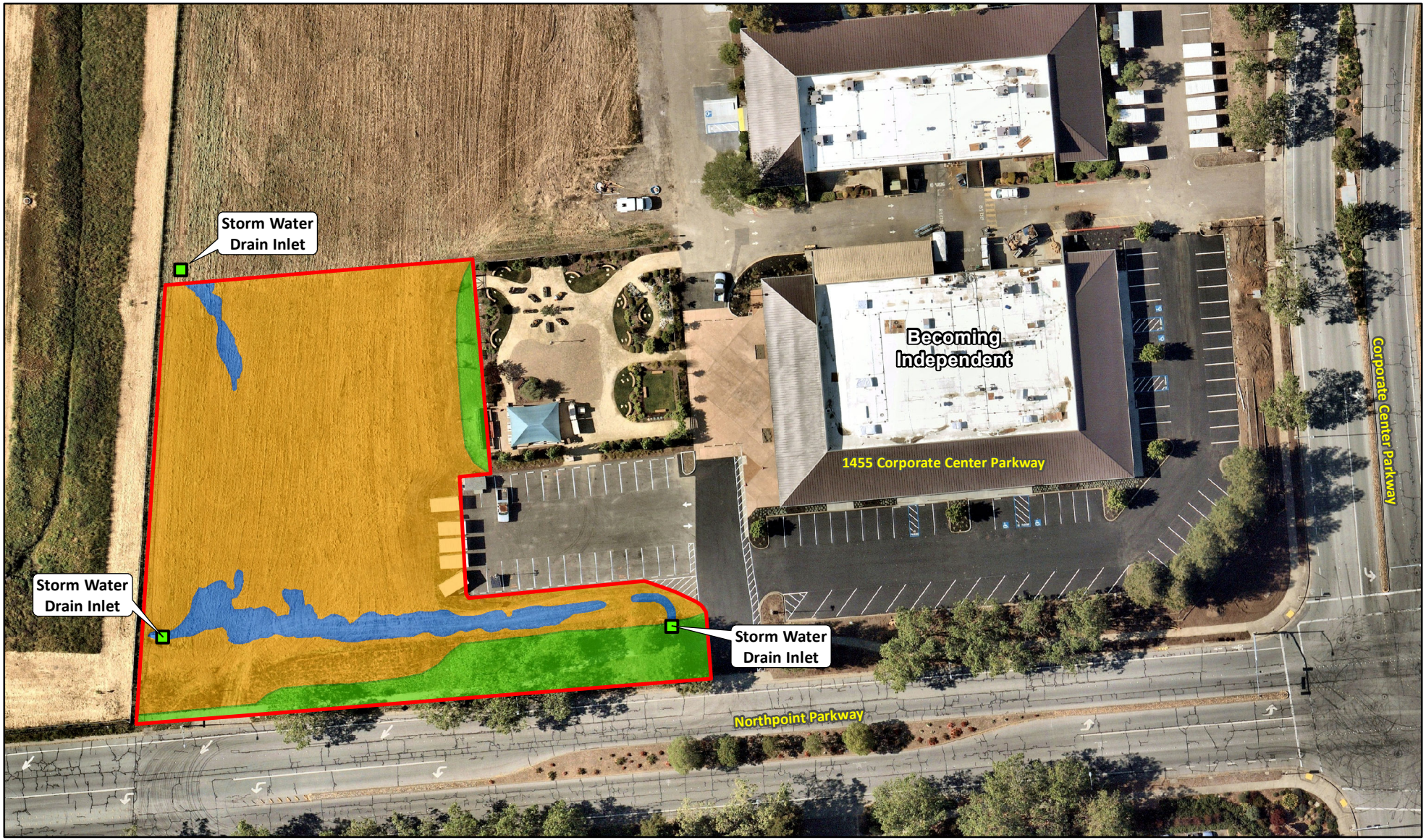

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FIGURE 2

LEGEND

Project Site (1.25 acres)

Storm Water Drain Inlet

Vegetation Communities and Land Cover Types

Non-Native Grassland

Ornamental Landscaping

Seasonal Wetland

0 40 80

FEET

SOURCE: Nearmap (05/2022).

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Becoming Independent
Santa Rosa, Sonoma County, California

Vegetation Communities and Land Cover Types