



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

Bay Delta Region

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GAVIN NEWSOM, Governor

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September 16, 2025

Conor McKay, Senior Planner
City of Santa Rosa
100 Santa Rosa Avenue, Suite 100
Santa Rosa, CA 95404
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Subject: South Santa Rosa Specific Plan, Notice of Preparation of a Program
Environmental Impact Report, SCH No. 2025080486, City of Santa Rosa,
Somona County

Dear Conor McKay:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) of a Program Environmental Impact Report (EIR) for the South Santa Rosa Specific Plan (project).

CDFW is providing the City of Santa Rosa (City), as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW staff are involved in the Technical Advisory Committee for the development of the EIR. To date staff involvement has been minimal, however CDFW anticipates increasing involvement in the future.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT LOCATION AND DESCRIPTION SUMMARY

The project is in the southern portion of the City of Santa Rosa and unincorporated Sonoma County in the City's sphere of influence and bordered by State Route 12 to the north, Bellevue-Wilfred Flood Control Channel to the south, and Juniper Avenue to the

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west. The eastern border is near Petaluma Hill Road. The project is centered at approximately 38.4020°N, 122.7155°W.

The project will guide the future development of a 1,900-acre area in southern Santa Rosa and unincorporated Sonoma County in the City's sphere of influence, identifying land use and transportation improvements to serve people who live, work, and play in the area. The project will establish a cohesive vision for South Santa Rosa by creating a blueprint for land use and circulation, including development and public realm standards, community health, and equity policies, capital improvements, and investments. The project will play a foundational role in regulating land use in the project area; it will be a high-level planning document that provides direction for capital improvements, zoning regulations, and other City plans and programs.

The CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.) require that the EIR incorporate a full project description, including reasonably foreseeable future phases of the project, that contains sufficient information to evaluate and review the project's environmental impact (CEQA Guidelines, §§ 15124 & 15378). Please include a complete description of the following project components in the project description:

- Land use changes resulting from, for example, rezoning certain areas;
- Footprints of permanent project features and temporarily impacted areas, such as staging areas and access routes.;
- Area and plans for any proposed buildings/structures, ground disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems;
- Operational features of the project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features; and
- Construction schedule, activities, equipment, and crew sizes.

The NOP identifies that the EIR will be a **Program EIR**. While Program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate

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identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, "Where the later activities involve site-specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR." Based on CEQA Guidelines section 15183.3 and associated Appendix N Checklist, and consistent with other program EIRs, CDFW recommends creating a procedure or checklist for evaluating subsequent project impacts on biological resources to determine if they are within the scope of the Program EIR or if an additional environmental document is warranted. This checklist should be included as an attachment to the EIR. Future analysis should include all special-status species and sensitive habitat including, but not limited to species considered rare, threatened, or endangered species pursuant to CEQA Guidelines, section 15380.

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a "within the scope" of the EIR conclusion. For subsequent project activities that may affect sensitive biological resources, a site-specific analysis should be prepared by a qualified biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent project activities' significant effects and indicate whether it incorporates all applicable mitigation measures from the EIR.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the project has the potential to result in "take" of plants or animals listed under CESA or candidates for CESA listing, either during construction or over the life of the project. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed or candidate species, such as: **California tiger salamander (*Ambystoma californiense*)**, **Sonoma sunshine (*Blennosperma bakeri*)**, **Sebastopol meadowfoam (*Limnanthes vinculans*)**, **Burke's goldfields (*Lasthenia burkei*)**, and **burrowing owl (*Athene cunicularia*)**, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP. **If a CESA ITP is warranted, CDFW recommends that the EIR include a mitigation measure requiring the project to obtain an ITP from CDFW, as further described below.**

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species (Pub.

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Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, and 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. **It appears that the project may impact Colgan Creek, Todd Flood Control Channel, Bellevue-Wilfred Flood Control Channel, and other streams. Impacts to any stream would likely require an LSA Notification. If an LSA Notification is required, CDFW recommends that the EIR include a mitigation measure requiring the project to submit an LSA Notification and compliance with the LSA Agreement, if issued.** CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA as a Responsible Agency.

Fully Protected Species

Fully protected species which may occur in or adjacent to the project area, such as **white-tailed kite (*Elanus leucurus*)**, may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code, § 2081.15). Project proponents should consult with CDFW early in the project planning process.

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Raptors and Other Nesting Birds

CDFW has jurisdiction over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

ENVIRONMENTAL SETTING

The EIR should provide sufficient information regarding the environmental setting (“baseline”) to understand the project’s, and its alternative’s (if applicable), potentially significant impacts on the environment (CEQA Guidelines, §§ 15125 & 15360).

CDFW recommends that the CEQA document prepared for the project provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the project area and surrounding lands, including, but not limited to all rare, threatened, or endangered species (CEQA Guidelines, § 15380). The EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species and sensitive natural communities that are known to occur, or have the potential to occur in or near the project site, include but are not limited to those listed in **Attachment 1**.

The environmental setting should also identify conservation or mitigation banks or proposed mitigation lands within or adjacent to the project area such as Horn Avenue Mitigation Bank (see: <https://www.mapcollaborator.org/cpad/> and <https://data.ca.gov/dataset/cdfw-owned-and-operated-lands-and-conservation-easements-ds3092>), and proposed permittee responsible mitigation land including the Horn 6 and Lone Oak sites, and also the potentially proposed Windmill site. CDFW can provide additional information to help support inclusion of these lands.

Habitat descriptions and the potential for species occurrence should include information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service’s (USFWS) Information, Planning, and Consultation System, California Aquatic Resources Inventory, and findings from “positive occurrence” databases such as

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California Natural Diversity Database (CNDDDB). Based on the data and information from the habitat assessment, the EIR should adequately assess which special-status species are likely to occur on or near the project site, and whether they could be impacted by the project.

IMPACT ANALYSIS AND MITIGATION MEASURES

The EIR should discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the project (CEQA Guidelines, § 15126.2). This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Encroachments into riparian habitats, wetlands or other sensitive areas;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, vegetation overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features.

The CEQA document should also identify reasonably foreseeable future projects in the project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the project's contribution to the impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact – e.g., reduction of available habitat for a special-status species – should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

Based on the comprehensive analysis of the direct, indirect, and cumulative impacts of the project, the CEQA Guidelines direct the lead agency to consider and describe all feasible mitigation measures to avoid potentially significant impacts in the EIR, and/or mitigate significant impacts of the project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370). This includes a discussion of impact avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with CDFW, USFWS, and the

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National Marine Fisheries Service. These measures can then be incorporated as enforceable project conditions to reduce potential impacts to biological resources to less-than-significant levels.

CDFW offers the specific comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Please be advised that the EIR should include a comprehensive evaluation of potentially significant impacts to fish and wildlife resources as described in this letter, and CDFW may provide additional comments once the EIR is circulated for public review.

CESA-Listed or Candidate Species

California Tiger Salamander

California Tiger Salamander (CNDDDB Occurrence Numbers 19, 33, and 79) have been documented within the project area. Portions of the project are within the area designated as "Likely to Adversely Affect California Tiger Salamander" in the 2020 U.S. Fish and Wildlife Service (USFWS) Programmatic Biological Opinion (PBO, available here: <https://www.fws.gov/media/santa-rosa-plain-conservation-strategy-appendix-b-biological-opinions>, with an associated mapping tool at <https://fws.maps.arcgis.com/apps/webappviewer/index.html?id=ac94c1a176f04d4587aff1f0fd16a7f8&level=11>) and are within potential California Tiger Salamander habitat based on the Santa Rosa Plain Conservation Strategy (available here: <https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy>).

If direct or indirect impacts to suitable grassland or wetland habitat for California Tiger Salamander would occur as a result of the project, CDFW recommends that the EIR include a mitigation measure requiring the project to obtain and comply with an ITP from CDFW and authorization from USFWS, as California Tiger Salamander is also listed under the federal Endangered Species Act (ESA). The EIR should also require that compensatory habitat be provided consistent with the Santa Rosa Plain Conservation Strategy. While often consistent with the Santa Rosa Plain Conservation Strategy, ITP habitat compensation requirements may differ based on a site-specific analysis.

CESA-Listed Plants

Burke's goldfields (CNDDDB Occurrence Number 41), Sebastopol meadowfoam (CNDDDB Occurrence Numbers 12, 42, and 57), and Sonoma sunshine (CNDDDB Occurrence Numbers 18 and 29) have been documented within the project area.

CDFW recommends that the EIR include a mitigation measure requiring that prior to construction, the project shall complete the botanical surveys described below where suitable habitat for the above CESA listed plants may be directly or indirectly impacted.

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Botanical surveys for Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields shall be conducted if direct or indirect impacts to suitable wetland habitat for these species would occur as a result of the project. In order for CDFW to accept the results of these surveys, they should be completed in conformance with CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (available here: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (available here: <https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy>), including, but not limited to conducting a minimum of two years of surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys should include the entire extent of any directly or indirectly impacted suitable wetland habitat, including portions of the wetland on adjacent parcels or not directly impacted, as impacts to part of a wetland often affects the entire wetland. Evaluation of indirect impacts may necessitate a thorough hydrological assessment that fully analyzes existing and post-project conditions to seasonal wetland habitat. Surveys conducted during drought conditions may not be acceptable.

If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or if surveys are not completed and the presence of these species and impacts to them is assumed, CDFW recommends that the EIR include a mitigation measure requiring the project to obtain and comply with an ITP from CDFW and authorization from the USFWS, as the above plant species are also listed under the federal ESA. The EIR should also require habitat compensation for impacts to occupied habitat for the above plant species at a minimum 3:1 mitigation to impact ratio, unless otherwise approved in writing by CDFW, and impacts to suitable habitat for the above federally listed plant species pursuant to the Santa Rosa Plain Conservation Strategy and 2020 USFWS PBO for projects on the Santa Rosa Plain, which requires a 1:5:1 ratio for mitigation within the same core area as the impact, and a 3:1 ratio if within a different core area. While often consistent with the Santa Rosa Plain Conservation Strategy and PBO, ITP habitat compensation requirements may differ from the above ratios and based on a site-specific analysis.

Burrowing Owl

Burrowing owl (CNDDDB Occurrence Numbers 564 and 2172) have been documented within five miles of the project, and the project is within the wintering range of the species.

CDFW recommends that the EIR include a mitigation measure requiring that prior to project construction, the project shall complete the burrowing owl habitat assessments

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and surveys described below where suitable habitat for burrowing owl may be impacted or where suitable habitat is present within 1,640 feet of the project area.

If the project occurs during the burrowing owl wintering season from September 1 to October 15 (or any extended work period), prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area pursuant to the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report, available here: <https://wildlife.ca.gov/Conservation/Survey-Protocols#377281284-birds>), unless otherwise approved in writing by CDFW. The Qualified Biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology. The habitat assessment shall focus on searching the CNDDDB and potentially other sources for any burrowing owl records on or within one mile of the project area, vegetation type and height, suitable burrows (with an opening greater than 11 centimeters in diameter and a depth greater than 150 centimeters), burrow surrogates (culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures), and presence of burrowing owl sign (tracks, molted feathers, cast pellets, prey remains, egg shell fragments, owl white wash, and nest burrow decoration material), and the presence of burrowing owl individuals or pairs. If the habitat assessment does not identify suitable habitat and surveys are not conducted as described below, an additional habitat assessment shall be conducted within 14 days prior to construction and if new potentially suitable burrowing owl refugia are present surveys shall be conducted as described below, unless otherwise approved in writing by CDFW. The results of the habitat assessment shall be emailed to CDFW and the project shall obtain CDFW's written approval of the habitat assessment prior to starting project activities.

If suitable burrowing owl habitat is observed, four surveys shall be conducted to detect the presence of burrowing owl pursuant to the CDFW 2012 Staff Report. The site visits shall be spread evenly throughout the non-breeding season, unless otherwise approved in writing by CDFW. The survey results shall be emailed to CDFW and the project shall obtain CDFW's written approval of the survey results prior to starting project activities. In addition, a survey shall be completed within 14 days prior to the start of construction, as described in the CDFW 2012 Staff Report. Time lapses of more than 14 days between project activities may trigger subsequent surveys including, but not limited to a final survey conducted within 24 hours prior to ground disturbance.

If burrowing owl is detected, the project shall immediately notify CDFW. The project shall avoid impacts to the burrowing owl and implement a 1,640-foot buffer area around the owl site in which no project activities shall occur, unless otherwise approved in writing by CDFW. A Qualified Biologist or Biological Monitor shall monitor any detected owl to ensure it is not disturbed.

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If the surveys result in the detection of the burrowing owl that may be impacted by the project, or the presence of this species and impacts to it are assumed, CDFW recommends that the EIR include a mitigation measure requiring the project to obtain and comply with an ITP from CDFW. The EIR should also require habitat compensation for impacts to occupied burrowing owl habitat at a minimum 3:1 mitigation to impact ratio, unless otherwise approved by CDFW.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during project surveys to CNDDDB. The CNDDDB online field survey form and other methods for submitting data can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Plantsand-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist), at (707) 428-2075 or Nicholas.Wagner@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory), at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Special-Status Species and Sensitive Natural Communities

ec: Office of Land Use and Climate Innovation, State Clearinghouse, Sacramento

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ATTACHMENT 1: Special-Status Species and Sensitive Natural Communities

Scientific Name	Common Name	Status
Amphibians & Reptiles		
<i>Rana draytonii</i>	California red-legged frog	FT, SSC
<i>Actinemys marmorata</i>	northwestern pond turtle	FPT, SSC
<i>Ambystoma californiense</i>	California tiger salamander - Sonoma County DPS	FE, ST
Birds		
<i>Elanus leucurus</i>	white-tailed kite	FP
<i>Athene cunicularia</i>	burrowing owl	SC, SSC
<i>Accipiter cooperii</i>	Cooper's hawk	WL
Plants		
<i>Limnanthes vinculans</i>	Sebastopol meadowfoam	FE, SE, CRPR 1B.1
<i>Lasthenia burkei</i>	Burke's goldfields	FE, SE, CRPR 1B.1
<i>Blennosperma bakeri</i>	Sonoma sunshine	FE, SE, CRPR 1B.1
<i>Amsinckia lunaris</i>	bent-flowered fiddleneck	CRPR 1B.2
<i>Trifolium buckwestiorum</i>	Santa Cruz clover	CRPR 1B.1
<i>Fritillaria liliacea</i>	fragrant fritillary	CRPR 1B.2
<i>Downingia pusilla</i>	dwarf downingia	CRPR 2B.2
<i>Microseris paludosa</i>	marsh microseries	CRPR 1B.2
<i>Trifolium hydrophilum</i>	saline clover	CRPR 1B.2
<i>Trifolium amoenum</i>	two-fork clover	CRPR 1B.1
Fishes		
<i>Oncorhynchus mykiss</i>	Central California Coast winter steelhead	FT, SSC

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Mammals		
<i>Taxidea taxus</i>	American badger	SSC
<i>Antrozous pallidus</i>	pallid bat	SSC
Sensitive Natural Communities		
Coastal and Freshwater Valley Marsh		
Northern Hardpan Vernal Pool		
Northern Vernal Pool		
Valley Needlegrass Grassland		

FP = state fully protected under Fish and Game Code; FE = federally listed as endangered under the Endangered Species Act (ESA); FT = federally listed as threatened under ESA; FPT = proposed as threatened ESA; SE = state listed as endangered under CESA; SC = state candidate species under CESA; SSC = state Species of Special Concern; FP = state Fully Protected Species; CRPR = California Rare Plant; DPS = distinct population segment; WL = CDFW Watch List