



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



October 21, 2025

Olguin Caban, Assistant Engineer
Sonoma County Public Infrastructure
400 Aviation Boulevard, Suite 100
Santa Rosa, CA 95403
Olguin.Caban@sonomacounty.gov

Subject: Todd Road and Standish Avenue Intersection Improvements Project,
Mitigated Negative Declaration, SCH No. 2025091118, Sonoma County

Dear Olguin Caban:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from Sonoma County Public Infrastructure (County) for the Todd Road and Standish Avenue Intersection Improvements Project (project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

CDFW is submitting comments on the MND to inform the County, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the project.

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), Lake and Streambed Alteration Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: Sonoma County Public Infrastructure

Objective: The project proposes to improve the intersection of Todd Road at Standish Avenue to meet current Sonoma County standards and signalize the intersection to facilitate current and projected traffic movements including large truck traffic. The project would involve roadway excavation at the intersection to connect power to the

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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new traffic signal mast arms and new drainage inlets to connect with the existing and/or relocated storm drain lines. The drainage improvements would occur within the existing right-of-way and the project improvement limits.

Location: The 2.66-acre project site is located at the intersection of Todd Road and Standish Avenue in unincorporated Sonoma County south of the City of Santa Rosa, in Sections 2, 3, 10, and 11, Township 6 North, Range 8 West as depicted on the Mount Diablo Meridian Santa Rosa U.S. Geological Survey 7.5' quadrangle map, on Assessor's Parcel Numbers 134-102-070, 134-102-071, 134-102-084, 134-102-014, 134-171052, 134-171-049, 134-171-050, 134-171, and at approximately Latitude 38.38718 °N, Longitude 122.72294 °W.

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, either during construction or over the life of the project. **The project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), which is CESA listed as threatened, and Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*), which are CESA listed as endangered species, and burrowing owl (*Athene cunicularia*), which is a CESA candidate species, as further described below.** 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 species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP.

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. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 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.

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

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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.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the project's avoidance of significant impacts on biological resources with implementation of mitigation measures, including those CDFW recommends below, CDFW concludes that an MND is appropriate for the project. **Attachment 1** includes CDFW's recommended mitigation measures in a Draft Mitigation Monitoring and Reporting Program.

1. Mandatory Findings of Significance: Does the project have the potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal?

COMMENT 1: Mitigated Negative Declaration Pages 25-26, California Tiger Salamander, Environmental Setting and Related Impact Shortcoming

- 1. Issue:** The MND states that the project site contains ruderal vegetation and bare ground which may represent suitable upland habitat for California tiger salamander, but that impacts to California tiger salamander would not occur because the project site does not include pavement widening activities and will not alter the existing drainages within the project site. However, the MND also states that project improvements will occur on the dirt/gravel road shoulder and previously disturbed areas. California tiger salamander may utilize previously disturbed areas containing ruderal vegetation. Based on Google Earth aerial imagery, it appears that the project site overlaps with the edges of grassland habitat which contains ruderal vegetation. The project site is also within critical habitat for California tiger salamander, as designated by the U.S. Fish and Wildlife Service (USFWS). California tiger salamander breeding habitat has been documented near the project site, including at the Zero Todd Road project (38.390407, -122.729798) approximately 700 feet west of the project site (California Natural Diversity Database [CNDDDB] Occurrence Number 78) and along Ghilotti Avenue approximately 400 feet south of the project site (CNDDDB Occurrence Number 33), which are within the 1.3-mile dispersal distance for California tiger salamander.

The 2021 Biological Resources Assessment (BRA) referenced in the MND states "... (CTS) may move through the drainage ditches within the study area during migration from breeding to estivation areas or during dispersal. The project would include installation of silt fencing at the limits of construction as indicated on the project site plans and project description to prevent construction impacts to ditches

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and adjacent uplands and prevent CTS from entering the project site. Therefore, no impacts to CTS would occur.” However, typical silt fencing is not specifically designed to exclude California tiger salamander which could enter the project site during dispersal through holes in the silt fencing or through burrows that extend under silt fencing.

In addition, California tiger salamander may breed in drainage ditches with suitable hydroperiods, which can be as short as 8 weeks (O’Brien and Helm 2025). The BRA states “it cannot be definitively determined if water remains in these areas for a sufficient amount of time.” Therefore, the drainage ditch may have a sufficient hydroperiod for California tiger salamander breeding and isolating the ditch during project construction could prevent California tiger salamander successful breeding.

Specific impacts and why they may occur and be significant: The MND is unclear as to whether the project will impact suitable California tiger salamander habitat. If the project would directly impact suitable California tiger salamander habitat, the project may result in injury to or mortality of California tiger salamander from ground-disturbing activities within potential California tiger salamander upland habitat on the project site. The project may also result in indirect impacts to potential breeding habitat, as a result of potential hydrologic modifications to the drainage ditch, and prevent successful California tiger salamander breeding if the drainage ditch has a suitable hydroperiod. California tiger salamander is a CESA listed as threatened species, and is federally listed as endangered in Sonoma County (Sonoma County Distinct Population Segment). California tiger salamander is considered threatened under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if California tiger salamander are present on or directly adjacent to the project site or if indirect impacts to breeding habitat occur as a result of the project, the project may substantially reduce the number or restrict the range of this species, which would be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to California tiger salamander to less-than-significant and comply with CESA, CDFW recommends that the MND include: 1) a thorough analysis of the potential for California tiger salamander to occur within the project site considering the information provided above, and 2) the below mitigation measures.

MM-BIO-1. Prior to project construction, the project shall: 1) prepare a figure based on current aerial imagery clearly outlining the project impact area and where it overlaps with or is adjacent to potential CTS upland or breeding habitat, 2) provide the figure to CDFW, and 3) obtain CDFW’s written approval of the figure. If direct or indirect impacts to California tiger salamander habitat occur as a result of the project, prior to project construction, the project shall obtain a CESA ITP from CDFW and comply with the ITP. The project shall obtain authorization

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from the USFWS for impacts to California tiger salamander and comply with the authorization. The project shall also provide habitat compensation for California tiger salamander in accordance with the ITP and Santa Rosa Plain Conservation Strategy (Strategy). Please note that the CESA ITP habitat compensation requirements are often consistent the Strategy but may differ based on site specific conditions.

MM-BIO-2. If impacts adjacent to California tiger salamander habitat would occur as a result of the project, and impacts to California tiger salamander habitat would be avoided, the project shall prepare a California tiger salamander Avoidance Plan (plan) in consultation with CDFW, include CDFW's input in the plan, and implement it.

COMMENT 2: Mitigated Negative Declaration Page 24, California Endangered Species Act-listed Plants, Environmental Setting and Related Impact Shortcoming

Issue: The MND does not clearly state if suitable habitat for CESA-listed plants occurs within or adjacent to the project site. The project site includes drainage ditches but the MND does not specify if wetlands are present within the ditches. According to the BRA, vegetation in the drainage ditches includes broadleaf cattail (*Typha latifolia*), which occurs in wetlands. Sebastopol meadowfoam and Burke's goldfields are known to occur in drainage ditches (USFWS 2016). While the MND states that these ditches will be avoided, the MND does not address potential indirect impacts to seasonal wetlands, such as modification of hydrologic conditions, or construction related sedimentation into occupied wetland habitat, that may result in impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields. Sonoma sunshine is documented to occur 930 feet southwest of the project site (CNDDDB Occurrence Number 17). Sebastopol meadowfoam is documented to occur 1,150 feet southwest of the project site (CNDDDB Occurrence Number 14). As such, it is possible that indirect impacts as a result of the project may result in impacts to the above CESA-listed plants.

Specific impacts and why they may occur and be significant: Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields may be indirectly impacted by the project due to potential modification of hydrological conditions of the ditch which may contain occupied wetland habitat, construction related sedimentation into occupied wetland habitat, or other factors affecting any on-site or off-site occurrences of these species, resulting in unevaluated and unmitigated mortality of individuals. Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are CESA and federally listed as endangered species. These species are considered endangered under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if they are present adjacent to the project site where they would be indirectly impacted, the project may substantially reduce the number or restrict the range of these species, which would

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be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields to less-than-significant and comply with CESA, CDFW recommends that the MND include the following mitigation measure in the MND.

MM-BIO-3. Prior to ground disturbance, the project shall submit a wetland assessment and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site wetland habitat, such as modification of hydrological conditions or construction related sedimentation into occupied wetland habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation.

If direct or indirect impacts to potentially suitable wetlands may occur, the project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results should follow CDFW's 2018 Protocols for *Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (<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* (<https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy>). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting 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 the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal

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Endangered Species Act (ESA) (e.g., wetlands) and provide compensatory habitat mitigation as required.

II. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS?

COMMENT 3: Mitigated Negative Declaration Page 28, Burrowing Owl, Environmental Setting and Related Impact Shortcoming

Issue: The MND does appropriately evaluate potential impacts to burrowing owl, which have been documented within 2.6 miles of the project site (CNDDDB Occurrence Number 2172). The project is within the wintering range of burrowing owl and based on aerial imagery appear to be within or adjacent to potentially suitable habitat for the species.

Specific impacts and why they may occur and be significant: The project may impact wintering burrowing owl utilizing burrows or burrow surrogates on or within up to 1,640 feet of the project site. The project could result in injury or mortality of adults and permanent wintering (i.e., non-nesting) habitat loss. Burrowing owl is a candidate species for CESA listed as threatened because the species' population viability and survival are adversely affected by risk factors such as precipitous declines from habitat loss, fragmentation, and degradation; evictions from nesting sites without habitat mitigation; wind turbine mortality; human disturbance; and eradication of California ground squirrels resulting in a loss of suitable burrows required by burrowing owl for nesting, protection from predators, and shelter (Shuford and Gardali 2008; Department of Fish and Game Staff Report on Burrowing Owl Mitigation (2012); personal communication, CDFW Statewide Burrowing Owl Coordinator Esther Burkett, May 13, 2022). Information indicates a decline in burrowing owl range over time, burrowing owl has experienced population declines in regions of California and threats to burrowing owl, coupled with long-term population declines, suggest a high degree and immediacy of threat to burrowing owl in California (CDFW 2024). Based on the foregoing, if burrowing owl are wintering on or within up to 1,640 feet of the project site, project impacts to burrowing owl would be potentially significant.

Recommended Mitigation Measure: For an adequate environmental setting and to reduce potential impacts to burrowing owl to less-than-significant and comply with CESA and Fish and Game Code section 3503 et seq., CDFW recommends including the below mitigation measures in the MND.

MM-BIO-4. If the project occurs during the burrowing owl wintering season from September 1 to January 31, prior to project activities a Qualified Biologist shall conduct a burrowing owl habitat assessment within 1,640 feet of the project area

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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 habitat assessment and survey methodology. The habitat assessment shall focus on searching the California Natural Diversity Database 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 of greater than 11 centimeters [cm] in diameter and a depth of greater than 150 cm), 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. Surveys should begin August 1. 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.

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, the project shall obtain a CESA ITP from CDFW prior to construction and comply with

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all requirements of the ITP including, but not limited to providing habitat compensation.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports 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 field survey form can be filled out and submitted online 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://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES


The project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. 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. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating project impacts on biological resources.

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:

B77E9A6211EF486...
Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

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ec: Office of Land Use and Climate Innovation (SCH No. 2025091118)
Vincent Griego, US Fish and Wildlife Service- Vincent_Griego@fws.gov

REFERENCES

California Department of Fish and Wildlife (CDFW, formerly California Department of Fish and Game). 2012. Staff Report on Burrowing Owl Mitigation. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline>

CDFW. 2024. Petition Evaluation for Western Burrowing Owl (*Athene cunicularia hypugaea*). Report to the Fish and Game Commission. California Department of Fish and Wildlife, P.O. Box 944209, Sacramento, CA.

Klute, D. S., L. W. Ayers, M. T. Green, W. H. Howe, S. L. Jones, J. A. Shaffer, S. R. Sheffield, and T. S. Zimmerman. 2003. Status Assessment and Conservation Plan for the Western Burrowing Owl in the United States. U.S. Department of Interior, Fish and Wildlife Service, Biological Technical Publication FWS/BTPR6001-2003, Washington, D.C.

O'Brien, S.M. and Helm, B.P. Minimum hydroperiod for metamorphosis in the California Tiger Salamander, *Ambystoma californiense*, *Herpetology Notes*, Volume 18: 613–616 (published online on 12 July 2025)

Shuford, W. D., and Gardali, T., editors. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

US Fish and Wildlife Service. 2016. Recovery Plan for the Santa Rosa Plain. Available online at: https://ecos.fws.gov/docs/recovery_plan/06012016_Final%20Santa%20Rosa_RP_signed_1.pdf

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ATTACHMENT 1

Draft Mitigation Monitoring and Reporting Program

Biological Resources (BIO)		
Mitigation Measure (MM) Description	Implementation Schedule	Responsible Party
<p>MM-BIO-1. Prior to project construction, the project shall: 1) prepare a figure based on current aerial imagery clearly outlining the project impact area and where it overlaps with or is adjacent to potential CTS upland or breeding habitat, 2) provide the figure to CDFW, and 3) obtain CDFW's written approval of the figure. If direct or indirect impacts to CTS habitat occur as a result of the project, prior to project construction, the project shall obtain a CESA ITP from CDFW and comply with the ITP. The project shall obtain authorization from the USFWS for impacts to CTS and comply with the authorization. The project shall also provide habitat compensation for CTS in accordance with the ITP and Santa Rosa Plain Conservation Strategy (Strategy). Please note that the CESA ITP habitat compensation requirements are often consistent the Strategy but may differ based on site specific conditions.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>
<p>MM-BIO-2. If impacts adjacent to CTS habitat would occur as a result of the project, and impacts to CTS habitat would be avoided, the project shall prepare a CTS Avoidance Plan (plan) in consultation with CDFW, include CDFW's input in the plan, and implement it.</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>
<p>MM-BIO-3. Prior to ground disturbance, the project shall submit a wetland assessment and an evaluation of potential direct and indirect impacts to any on-site or adjacent off-site wetland habitat, such as modification of hydrological conditions or construction related sedimentation into occupied wetland habitat, to CDFW for review and obtain CDFW's written acceptance of the assessment and evaluation.</p> <p>If direct or indirect impacts to potentially suitable wetlands may occur, the project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results should follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (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 (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

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<p>goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with the above survey protocols and guidelines, including, but not limited to conducting 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 the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation. In addition, the project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal ESA (e.g., wetlands) and provide compensatory habitat mitigation as required.</p>		
<p>MM-BIO-4. If the project occurs during the burrowing owl wintering season from September 1 to January 31, 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 habitat assessment and survey methodology. The habitat assessment shall focus on searching the California Natural Diversity Database 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 of greater than 11 cm in diameter and a depth of greater than 150 cm), 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</p>	<p>Prior to and during ground disturbance</p>	<p>Project Applicant</p>

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<p>obtain CDFW's written approval of the habitat assessment prior to starting project activities.</p> <p>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. Surveys should begin August 1. 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.</p> <p>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.</p> <p>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, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP including, but not limited to providing habitat compensation</p>		
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