
September 15, 2021

Mr. Tom Smith
Ghilotti Construction Company Inc.
246 Ghilotti Avenue
Santa Rosa, CA 95407

**Re: California Tiger Salamander Assessment for 304 Todd Road in Santa Rosa, California –
Revised per Updated Site Plan**

Dear Mr. Smith,

The purpose of this letter is to describe the methods and results of a protocol-level California tiger salamander (CTS; *Ambystoma californiense*) site assessment for the property located on Ghilotti Construction Company's construction yard project at 304 Todd Road in Santa Rosa, California (Study Area; Attachment A, Figure 1). This report is being prepared in response to comments from the California Department of Fish and Wildlife (CDFW) issued to Sonoma County. For this purpose, this letter addresses the potential for impact to CTS on the site with respect to the newly revised site grading plan dated March 18, 2021, for use of a portion of the property (Attachment C). Photographs of the site are provided in Attachment B.

Methods

The site assessment described in this report was performed in accordance with the October 2003 USFWS Interim Guidance on Site Assessment and Field Surveys for Determining Presence or A Negative Finding of the California Tiger Salamander. I, Dana Riggs a Principal Biologist with a background in wildlife ecology and more than 20 years of experience performing habitat assessments and protocol surveys for the CTS statewide and in Sonoma County, performed the site assessment on August 11, 2021.

Prior to the site visit, I reviewed available information and the CNDDDB database¹ for records on CTS sightings within 3.1 mile of the Project Site (Attachment A, Figure 2). I also reviewed available aerial photography to identify potential breeding/aquatic and upland habitats on the site and surrounding vicinity and whether barrier-free corridors are present to nearby suitable habitats and/or documented occurrences. During the site assessment, I conducted transects across the entire property to determine whether suitable habitat elements (e.g., suitable water bodies, small-mammal burrows, or other suitable refugia) are present to support CTS. I also evaluated

¹ California Department of Fish and Wildlife (CDFW). 2021. California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch, Sacramento, CA.

surrounding land uses located between the site and nearby suitable occupied habitats and any barriers to dispersal. A map of the property and surrounding habitats, and CNDDDB occurrences is provided in Attachment A (Figures 1-3). Photographs of the site are provided in Attachment B.

Results

Element 1. Is the project site within the range of the CTS?

The project site is within the range of the CTS and is located within the Santa Rosa Plain Conservation Strategy Area. The site is located within an area designated as “future development” and is within the “urban growth boundaries” as shown on the Figure 3 (revised) Conservation Strategy Map².

Element 2. What are the known localities of CTS within the project site and within 3.1 miles (5 km) of the project boundaries?

There are 51 documented occurrence records (or localities) of CTS within 3.1 miles of the project site. Attachment A, Figure 2 and 3 shows the location of these known occurrences relative to the project site. Of these documented occurrence records, three are located east of Highway 101, a known barrier to CTS. The remaining documented occurrence records are located west, north, and south of the site, two to the southeast (#328, #726), and one (#780) within the project site. The documented occurrence within the project site is recorded in an ephemeral erosion control ditch at the southern end of the site. This occurrence is presumed partially extirpated and consisted of two larvae observed in February 2003, one juvenile caught in a pitfall trap in November 2010, and another individual (life stage not specified) in 2013, presumed to be migrating from aestivation to breeding habitat. The exact location of breeding activity on-site is not known but is presumed to be in an erosion control ditch alongside Ghilotti Avenue as described in the occurrence record, which is immediately adjacent to the Study Area and is not within the project footprint as suggested by the CNDDDB polygon (Appendix A, Figures 2 and 3).

There are 14 documented occurrence records of CTS located within 1.3 miles (2 km) of the project site, the distance CTS have been known to migrate. This does not include the occurrence along Ghilotti Avenue (#780) or the one on the east of Highway 101. The nearest documented occurrence (#668) free from dispersal barriers is located approximately 1,700 feet or 0.32 miles (0.51 km) to the south and consisted of a single adult observation in 2013, also presumed extant in the area. The most recent nearby documented occurrence (#328), 0.65 miles (1 km) from the site was of larvae in 2019 observed in ponded drainage and vernal swale, (with regular observations of larvae in this area dating back to 1993). A majority of the remaining documented occurrences are of larvae or eggs and considered extant, however the date of documentation (early to mid-2000s for most) and continued development may indicate certain occurrences are

² U.S. Fish and Wildlife Service. 2014. Draft Recovery Plan for the Santa Rosa Plain: *Blennosperma bakeri* (Sonoma sunshine); *Lasthenia burkei* (Burke’s goldfields); *Limnanthes vinculans* (Sebastopol meadowfoam); Sonoma County Distinct Population Segment of the California Tiger Salamander (*Ambystoma californiense*). U.S. Fish and Wildlife Service, Pacific Southwest Region, Sacramento, California. vi + 132 pp

extirpated particularly those to the north of the project site within the “urban growth boundaries” designated areas. The 14 documented occurrence records of CTS located within 1.3 miles (2 km) of the project site are in areas designated as “future development”, “already developed (no potential for impacts)”, “CTS conservation areas”, and “areas within 1.3 miles of known breeding” as shown on the Conservation Strategy Map.

Element 3. What are the habitats within the project site and within 1.24 miles (2 km) of the project boundaries?

The project site is relatively flat at an elevation of between 32 and 33 meters (105- 111 feet), except for a large berm at the south end of the site with an elevation of 38 meters (126 feet). Impacted bare ground and gravel constitute the sides and top of the berm, limited vegetative groundcover on the sides. Underlying soils include Clear Lake clay, sandy, and Wright loam, commonly found on the Santa Rosa Plain; however, all of the berms on the property are comprised of fill material imported to the site in the early 2000s and do not provide suitable estivation habitat. The project site is developed, visible as gravel parking and equipment storage yards, storage containers and built structures, and pavement rubble piles, (the northern 3/4th having more materials structures and parked vehicles). The presence of fill and soil compaction preclude small mammal burrows on the site. Little vegetation is present on the project site and consists of mostly weedy species. Dominant natural communities present are ruderal grassland habitat and developed and disturbed habitat.

The paved road (Ghilotti Avenue) runs along the northeast side of the site stopping midway. A dirt road runs through the outer edge of the project site, over the berm and between rubble piles. An ephemeral erosion control ditch for a soil deposition area runs along Ghilotti Avenue outside the project footprint, extending from the top half of the site and connects into the more vegetated ditch base at the site base. This ditch provides suitable breeding habitat in above normal rainfall years and may provide isolated breeding pools towards the southern end in normal rainfall years. It is presumed this ditch is breeding habitat as described in occurrence #780 described above. Concrete k-rail surrounds the site to the west, south and east and creates a barrier between active areas of the project site and surrounding wetland drainage ditches and intact grassland habitats (k-rail is shown in redline on the attached revised site plan, Attachment C).

The project site is surrounded by industrial (construction company sites) and agricultural development (often disked), and ruderal grassland to the north, south, east, and west. Although there is suitable upland and breeding habitat within 1.3 miles (2 km) of the site, this habitat is poor quality, fragmented and mostly surrounded by development. The only potential corridor exists along the south and lower east more vegetated portion of the site; however concrete k-rail forms a barrier to dispersal from these locations onto the project site.

Impact Analysis and Discussion

Based on the findings of this assessment, there is no suitable upland refugia for CTS located on the project site due to presence of fill material and compaction from on-site activities dating back to the late 1990s. Suitable breeding habitat is present and presumed occupied immediately adjacent to the site within an ephemeral erosion ditch located along Ghilotti Avenue, outside the project footprint. Disturbance from vehicles on the site, including frequent vibration likely precludes estivation. Concrete k-rail surrounds the project footprint and forms a barrier to dispersing CTS from surrounding lands. It further provides an erosion control barrier by preventing on-site soils from discharging into adjacent wetlands. As such, no impact to wetlands nor CTS breeding habitat or dispersing adults is anticipated, provided this k-rail continues to be maintained during site operations.

Based on these findings, continued use and/or future modifications as prescribed in the proposed project plan are not likely to impact CTS nor CTS habitats now or in the future and no compensatory mitigation is recommended. Continued maintenance of the on-site k-rail barrier or replacement with a new permanent fence is recommended to ensure avoidance to CTS and nearby CTS habitats.

Please do not hesitate to contact me should you have questions.

Respectfully,

A handwritten signature in black ink, appearing to read 'Dana Riggs', is centered below the text 'Respectfully,'.

Dana Riggs, Principal Biologist

Attachments (2):

- Attachment A – Project Figures
- Attachment B – Site Photographs
- Attachment C – Revised Site Plan

Figure 1. Project Study Area



Project Study Area

304 Todd Road
Santa Rosa, CA

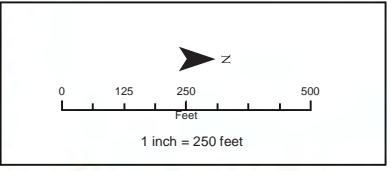
Legend

- Survey Area
- Roads and Streets



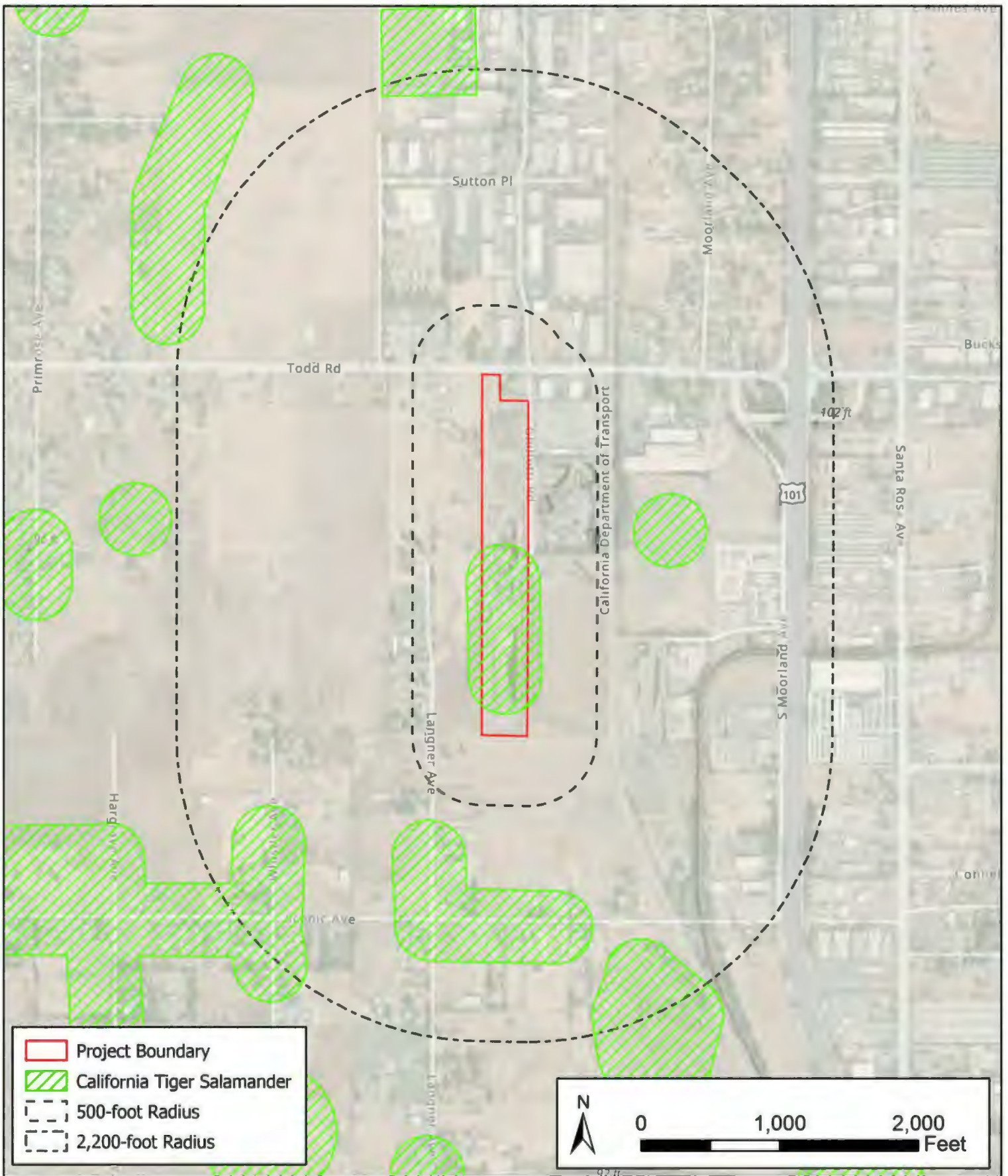
Coordinate System: NAD 1983 UTM Zone 10N
Projection: Universal Transverse Mercator
Datum: North American 1983
Vertical Datum: NAVD88, U.S. Feet

Map created: 7/21/2021
Data: Sol Ecology Inc., Sonoma Co.
Base: ESRI
GIS: AG2060



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community





2246 Camino Ramon
San Ramon, CA 94583

CNDDDB California Tiger Salamander
Occurrences within 2,200 feet of
304 Todd Road
Santa Rosa, California

Attachment B. Site Photographs



Concrete k-rail (right) prevents CTS from accessing (dispersing onto) the site. Berms are comprised of fill material and do not provide suitable estivation habitat for CTS.



Concrete k-rail is maintained regularly and backfilled on the interior to prevent CTS from dispersing onto site. K-rail also acts a barrier to prevent accidental discharge to adjacent wetlands and drainage ditches (shown on left).



Concrete k-rail prevents CTS from dispersing into stockpile and staging areas on the site.



On-site berms are comprised entirely of fill and do not provide suitable estivation habitat for CTS. These areas are covered with a mix of ruderal grass species during portions of the year but remain unsuitable for burrowing animals.

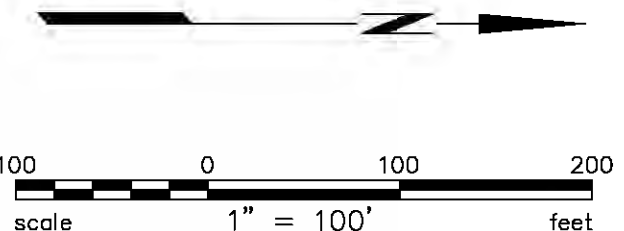
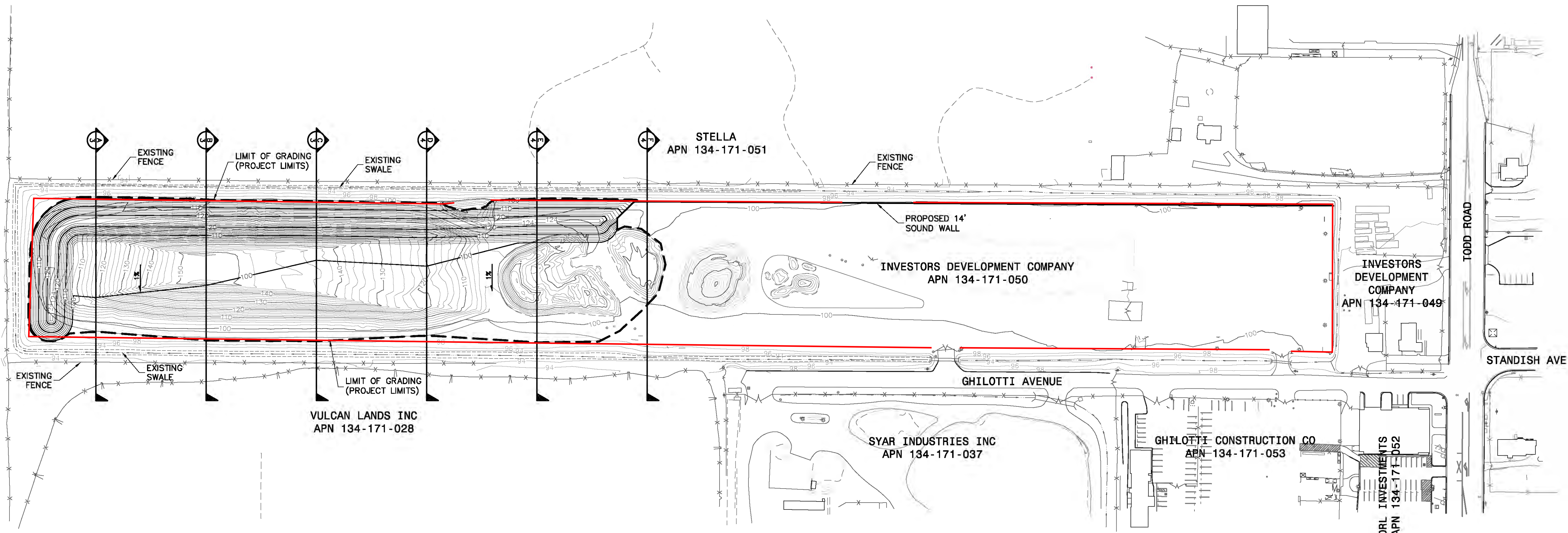


West facing photo taken from top of berm looking out onto dirt roads and adjacent disked agricultural parcel; site compaction and fill precludes CTS.



South facing photo of roadside ditch along north east portion of site; feature does not provide suitable breeding habitat except possibly in very wet years. Concrete k-rail (to the right) provides a barrier between this ditch and the project site.

BARELLA
APN 045-013-001



GRADING PLAN

GHILOTTI CONSTRUCTION COMPANY
 APN 134-171-050
 304 TODD ROAD
 CITY OF SANTA ROSA, CALIFORNIA
 MARCH 18, 2021

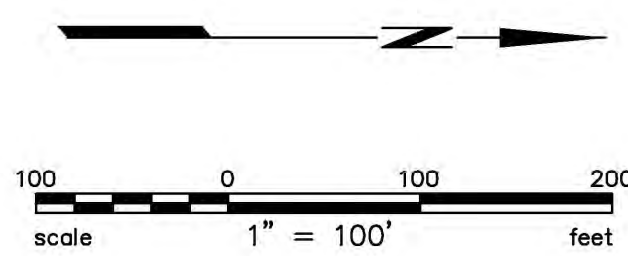
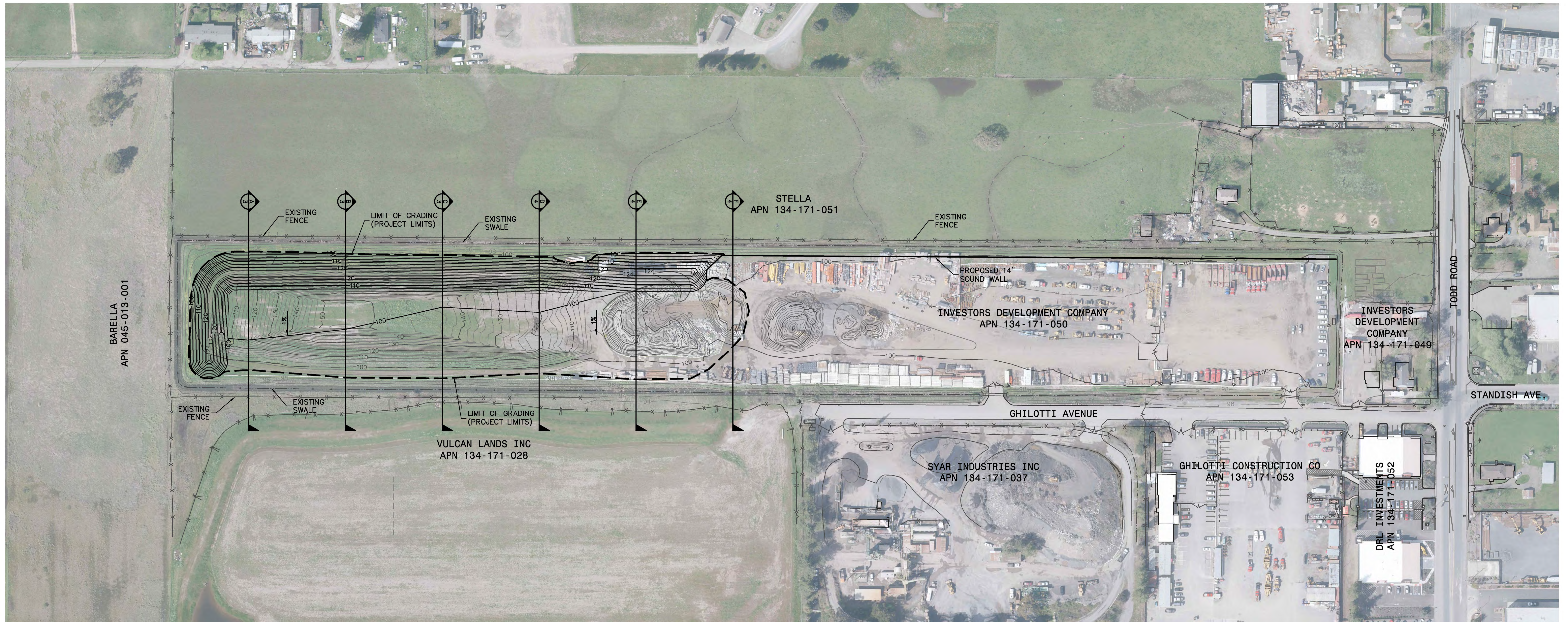
PREPARED BY



200 4th STREET
 SUITE 300
 SANTA ROSA, CA 95401
 (707) 583-8500
 www.bkf.com

Plot Mar 18, 2021 at 2:35pm

109099_SITL.dwg COPYRIGHT © 2021 BKF ENGINEERS



GRADING PLAN

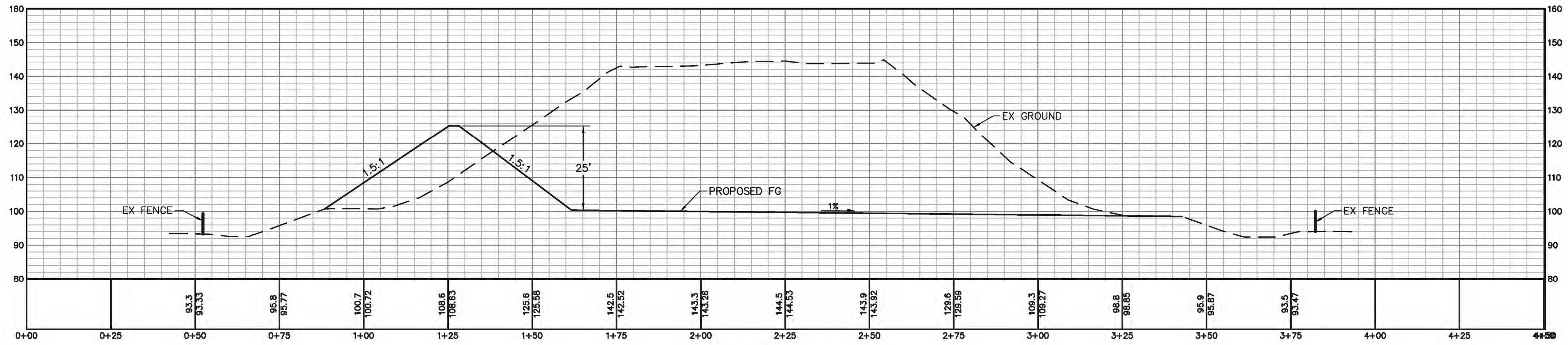
GHILOTTI CONSTRUCTION COMPANY
APN 134-171-050

304 TODD ROAD
CITY OF SANTA ROSA, CALIFORNIA

MARCH 18, 2021

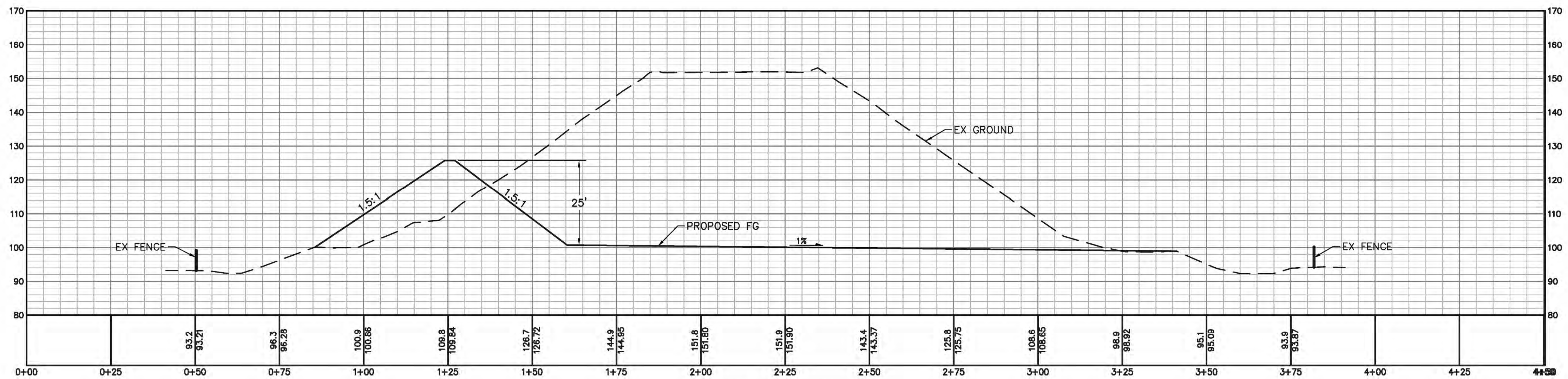
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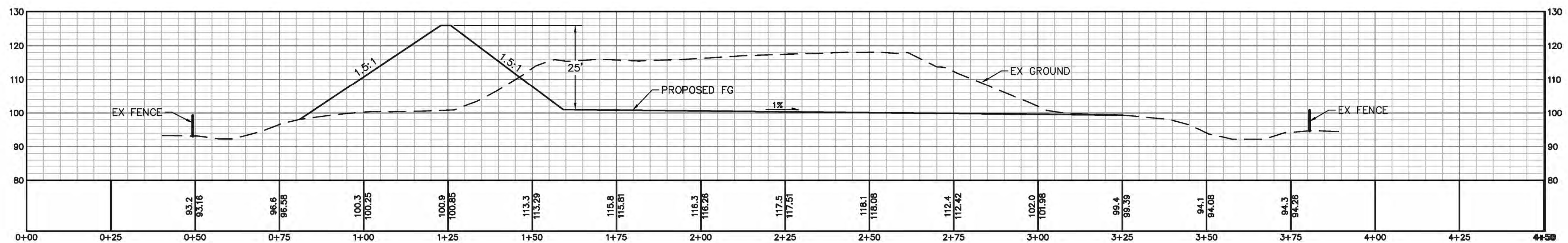
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Section B

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Section A

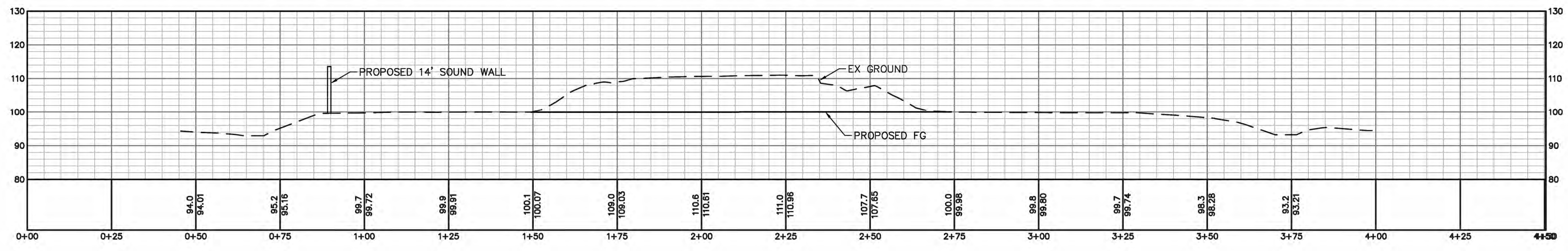
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 CITY OF SANTA ROSA, CALIFORNIA

MARCH 18, 2021

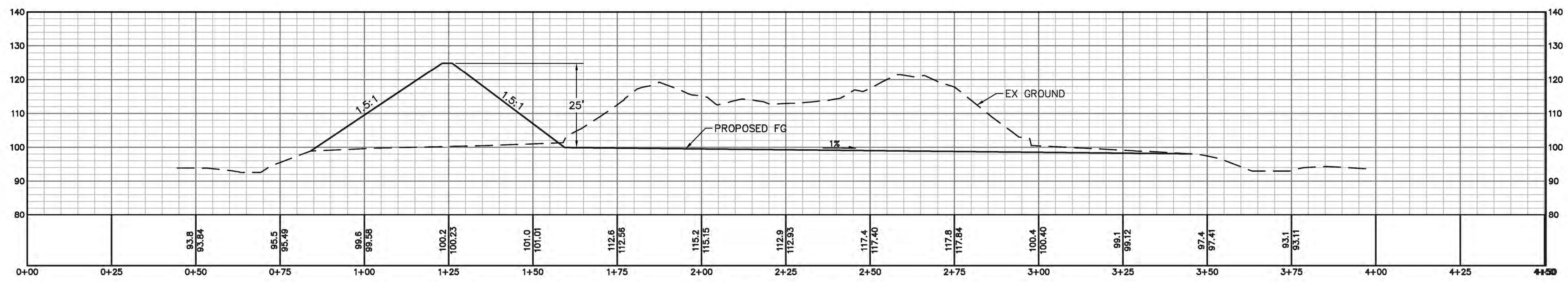
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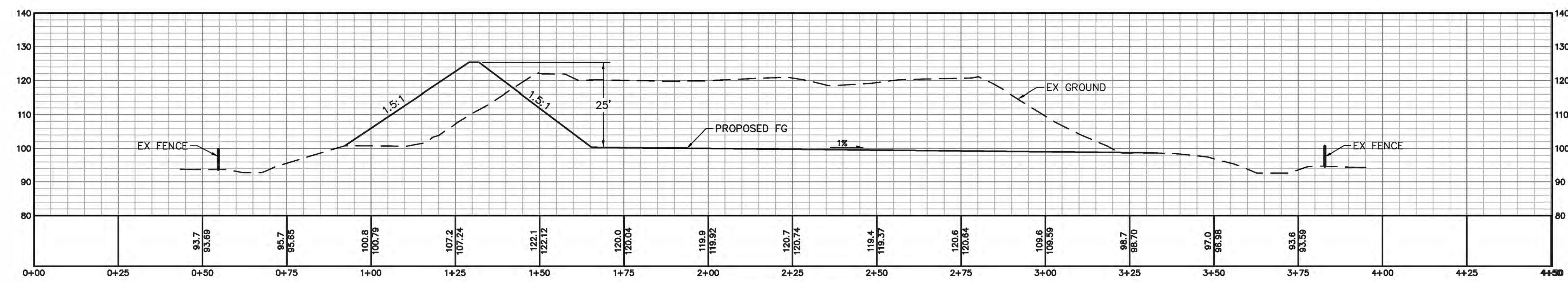
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Section E

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Section D

H: 1"=100'
V: 1"=100'

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