

August 25, 2020
(Updated August 26, 2020)

Sent Via Email

Mr. Alex Diaz
Los Pinos Apartments LLC
5885 Mountain Hawk Drive
Santa Rosa, CA 95409
alexdiame@icloud.com

Subject: Minor Amendment to Endangered Species Act Biological Assessment for the Los Pinos Apartments Project dated August 2019

Dear Mr. Diaz,

The purpose of the amendment is to ensure any environmental impacts associated with the installation of a HDPE storm drain line which extends approximately twelve linear feet beyond the property boundary has been analyzed with respect to the California Environmental Quality Act (CEQA).

The following is an amendment to the Project Description provided in Section 2.3 of the ESA BA, description of the Action Area provided in Section 3.0, and an analysis to determine if the addition of this detail changes the overall findings provided in the ESA BA.

1. Project Description (Section 2.3 in the ESA BA):

The Project is a 50-unit apartment complex encompassing 2.55 acres. The Project includes 7 distinct buildings situated along the northern boundary. The first building fronting Santa Rosa Avenue will house a community room, kitchen and rental office. The remaining buildings will support 36 two bedroom and 12 one bedroom apartments. A total of 113 parking spaces is proposed, with 5 of the spaces designated as "Accessible." Fifty of the 113 parking spaces will be covered with 13 carports. A children's playground will be located between the two buildings closest to Santa Rosa Avenue. The site plan is shown in Figure 4. The Project will require the demolition of an unoccupied residential home and several small sheds and the removal of approximately 9 of the 20 existing trees. Two underground storm drains are proposed to connect to existing Sonoma County Water Agency storm drain systems at the southwest and southeast corners of the site. The project will require importation of approximately 4,630 cubic yards of soil to raise the elevation of the site above the projected 100 year floodplain elevation. Grading activities would result in the permanent placement of fill material (soil) into 0.30 acres of seasonal wetlands and may affect federally-listed California tiger salamander.

Equipment to be used in grading the 2.55-acre footprint for the site will include front-end loaders, dump trucks, and an excavator or back-hoe that may be needed for installation of building foundations and infrastructure.

Measures to minimize project impacts on CTS (see section 4.6) are included in the project description and include exclusion fencing around the perimeter of the development footprint, use of qualified biological monitors, preconstruction surveys, development of erosion control plans, and other measures. Construction of the project is anticipated to last approximately one year.

In addition, a new 24" diameter high density polyethylene (HDPE) storm drain will be installed at the southeastern corner of the Project Site and will extend approximately 12 feet beyond the property boundary, where it will connect into an existing 36" storm drain along Todd Creek trail. The storm drain will be placed approximately four feet below the surface. Excavation of the storm drain trench will require the use of an excavator with a 3 foot wide bucket. The excavator will work from within the property boundary. Gravel will be placed along the bottom of the trench and sides and top of the pipe once installed. Excavated soil used to back fill the trench will be side-cast onto the property boundary in order to avoid disturbing the existing grass and soil along the Todd Creek trail.

Excavation of the trench, placement of the HDPE, gravel, new SDMH, and tie in to the SDFD within this 12 linear foot area should take no more than 3 days to complete. The total footprint of disturbed area will be limited to the width and length of the trench (4' x 12') for a total of 48 square feet or 0.001 acres. This additional impact does not increase the CTS calculation of 2.13 acres presented in the ESA BA.

2. Description of the Action Area (Section 3.0 in the ESA BA):

On August 12, 2020, HBG conducted a site visit to confirm previous assessments that the area between the property boundary and Todd Creek trail do not support wetlands or other waters of the US or State. Dominate vegetation found within the 48 square foot area were wild oats (*Avena spp.*), ripgut brome (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), and ryegrass (*Festuca perennis*).

The addition of the 48 square foot area does not change the total acres referenced throughout the ESA BA (i.e. 2.55 acres) or the general description of the project area described in Section 3.0; does not change the description of the plant communities or animal populations described in Section 3.2; does not change the acres of wetlands described in Section 3.3; and does not change the federal or state listed species described in Section 3.4.

3. Effects of the Proposed Action & Conclusions (Sections 4.5 & 6.0 in the ESA BA):

The addition of this feature does not change HBG's findings¹ of the *Effects of the Proposed Action* or Conclusions for the following reasons:

1. Although the Action Area boundary shown in the ESA BA did not include this 48 square foot area, the biologist who conducted the biological assessment and jurisdictional delineation did review areas abutting the "Action Area" in order to make a sound assessment of potential impacts. Based on the current site conditions (no wetlands)

¹ These analyses can be found in Section 4.5 and 6.0 of HBG's ESA BA

and the location of the 48 square foot area, the impact findings, and total impacts to CTS Suitable Upland Habitat of 2.13 acres shown on the original Figure 9 and the attached updated Figure 9 would not change. Refer to Exhibit 1 for a plan view of the storm drain and Exhibit 2 for the updated Figure 9.

2. Conservation Measures listed in Section 4.6 of the ESA BA will apply to this area.

If you have any questions, please feel free to contact me at 415.385.4106, rperrera@hbggroup.com.

Sincerely,

Robert F. Perrera Digitally signed by
Robert F. Perrera
Date: 2020.08.26
12:50:26 -07'00'

Robert F. Perrera
Senior Wetlands Regulatory Scientist

Enclosure:

Exhibit 1. Grading Drainage and Utility Plan, Sheet 2

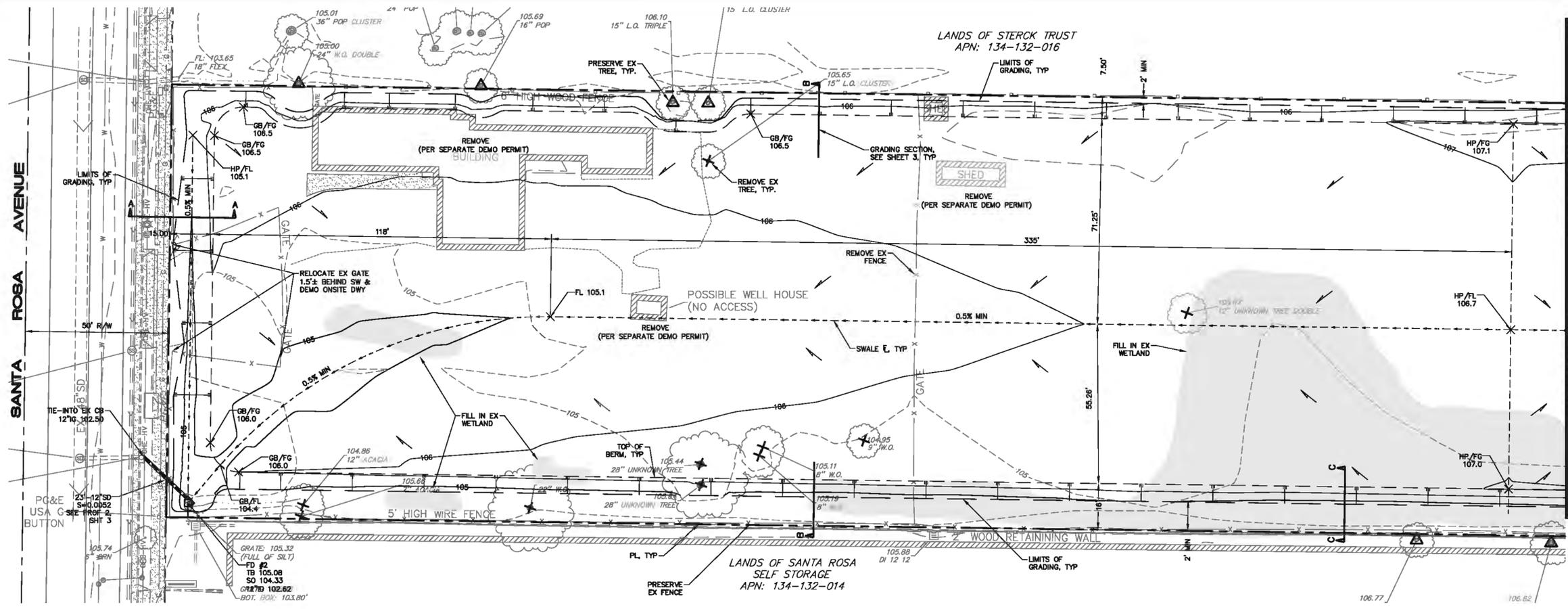
Exhibit 2. Figure 9. Location of Suitable CTS Habitat on the 2.55-acre Site (Updated 8-19-2020)

Cc:

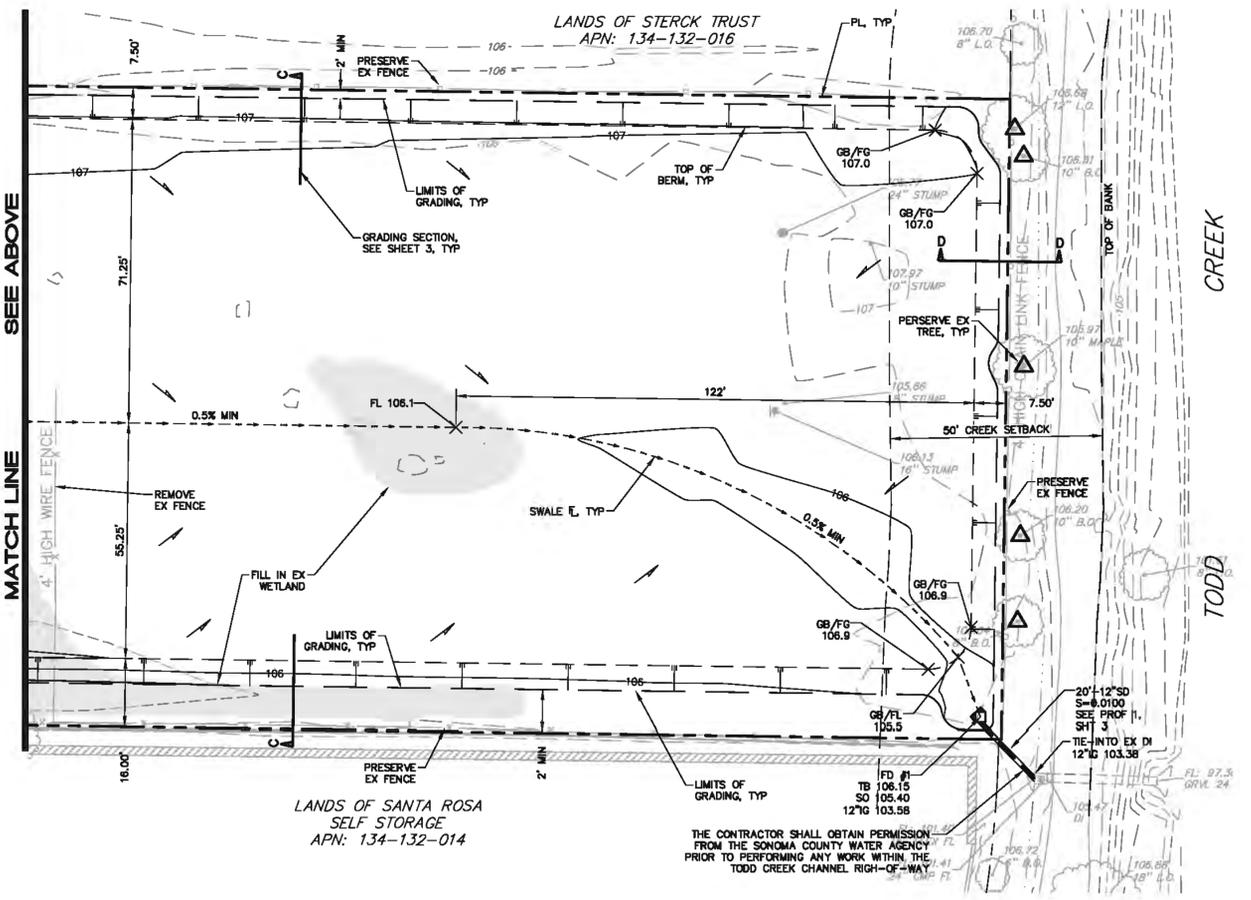
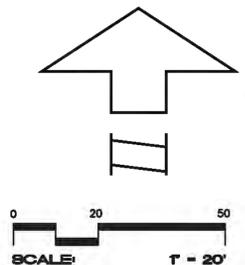
Ms. Jean Kapolchok, Kapolchok and Associates
Mr. Andy Bordessa, P.E., Civil Design Consultants, Inc.
Mr. Joseph Dorger

Exhibit 1

Grading Drainage and Utility Plan, Sheet 2



SEE BELOW
MATCH LINE



SEE ABOVE
MATCH LINE

LANDS OF SANTA ROSA
SELF STORAGE
APN: 134-132-014

THE CONTRACTOR SHALL OBTAIN PERMISSION
FROM THE SONOMA COUNTY WATER AGENCY
PRIOR TO PERFORMING ANY WORK WITHIN THE
TODD CREEK CHANNEL RIGHT-OF-WAY

REVISIONS			
NO.	REVISION	DATE	R.C.E.

APRIL 2020
4/14/20
DATE

ANDREW BORDESSA
REGISTERED PROFESSIONAL ENGINEER - CIVIL
No. 34088
STATE OF CALIFORNIA
FORCE 049368

CML DESIGN CONSULTANTS, INC.
2200 Range Avenue, Suite 204
San Jose, CA 95131
(707) 542-1820

GRADING, DRAINAGE AND UTILITY PLAN
3496 SANTA ROSA AVENUE
SANTA ROSA, CALIFORNIA
APN: 134-132-015

APRIL 2020

JOB NO.
18-138

SHEET NO.
2

OF 5 SHEETS

Exhibit 2.

**Figure 9. Location of Suitable CTS Habitat on
the 2.55-acre Site (Updated 8-19-2020)**

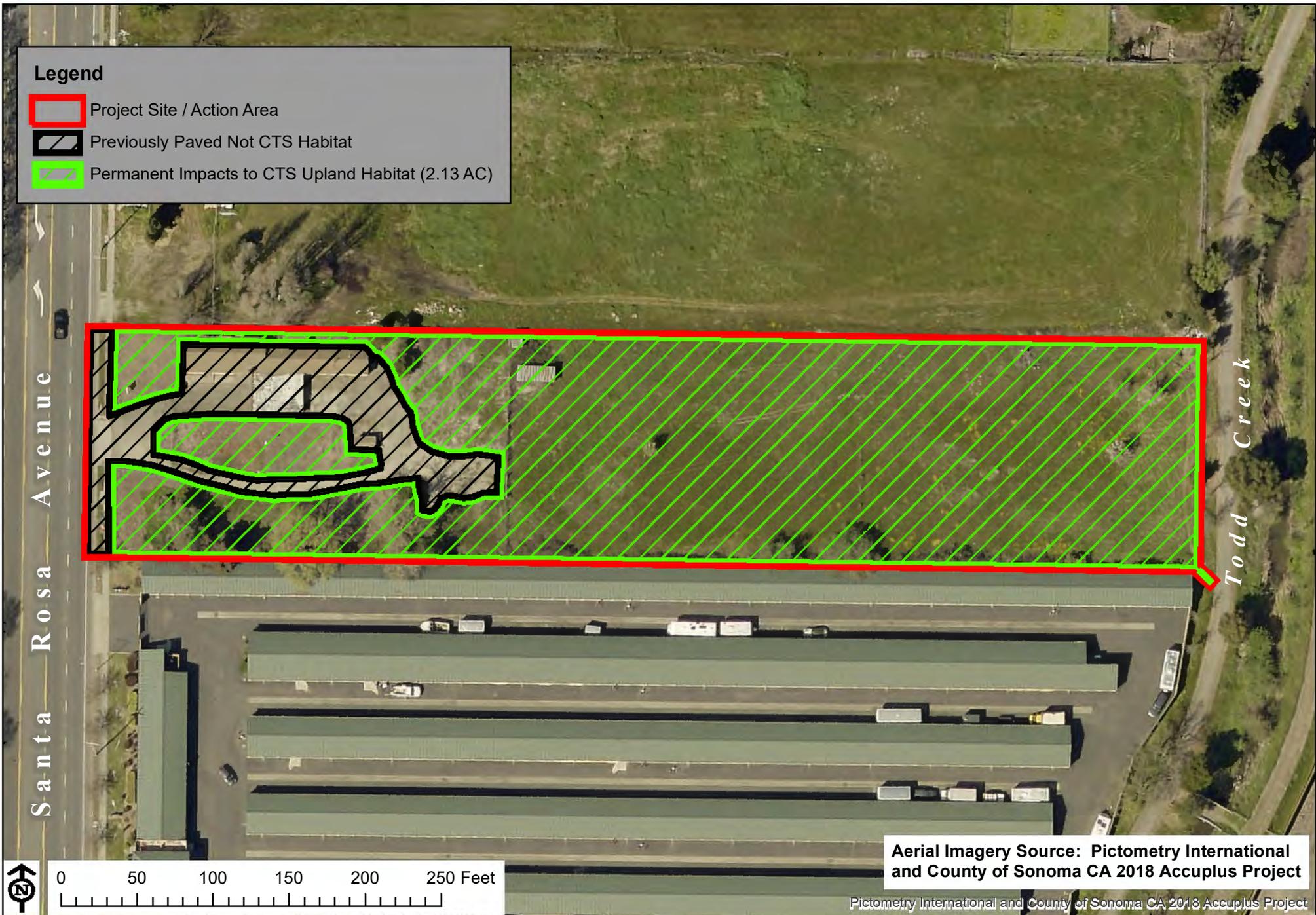


Figure 9. Location of Suitable CTS Habitat on the 2.55-acre Site (Updated 8-19-2020)

Los Pinos Apartments Project
 Sonoma County, California

Huffman-Broadway Group, Inc.
 ENVIRONMENTAL REGULATORY CONSULTANTS

Date Prepared: August 28, 2019

Prepared by: Huffman-Broadway Group