

November 1, 2021

Highway 116 Associated Investors LLC
1101 Fifth Avenue, Suite 150
San Rafael, California 94901

Attention: Mr. Tom Monahan

**RE: Assessment of Site Potential to Support Western Burrowing Owl
City of Cotati – 101 Sonoma Project Site (Village Project)
Cotati, California**

Dear Mr. Monahan:

1. INTRODUCTION

The Cotati Village Project (hereinafter Village Project) was originally part of the South Sonoma Business Park Master Plan Project (Assessor's parcel numbers 144-050-009 & 046-286-021) in the City of Cotati. A significant portion of the proposed Village Project development site (hereinafter the project site) is currently developed with the Lowe's Home Improvement Store and the Cotati Cottages subdivision. Currently, the Highway 116 Associated Investors LLC (the Managing General Partner is Monahan Pacific) (hereinafter the Applicant) is proposing to develop the southwest one-quarter of the project site with residential and commercial buildings as well as a public park. This proposed development is the Cotati Village Project.

It is our understanding that, prior to approval of the proposed Village Project, the City of Cotati has asked the applicant for an analysis of whether the project site could support the western burrowing owl. Monk & Associates, Inc., (M&A) has prepared this letter to describe the current conditions on the Cotati Village project site and assess the potential for the project site to support suitable habitat for the western burrowing owl (*Athene cunicularia hypugaea*).

M&A believes that the project site does not support any suitable breeding or overwintering habitat for the burrowing owl due to reasons that are discussed further below. Primarily, the project site lacks suitable habitat for western burrowing owl due to the absence of donor burrows which are needed for nesting and/or habituation.

2. WESTERN BURROWING OWL REGULATORY HISTORY AND HABITAT REQUIREMENTS

The western burrowing owl is a California "species of special concern." Its nest, eggs, and young are also protected under California Fish and Game Code (§3503, §3503.5). Based upon this species' rarity status, any unmitigated impacts to rare species would be considered a "significant effect on the environment" pursuant to §21068 of the CEQA Statutes and §15382 of the CEQA Guidelines. Thus, this owl species must be considered in any project that will, or is currently, undergoing CEQA review, and/or that must obtain an environmental permit(s) from a public agency. When these owls occur on project sites, typically, mitigation requirements are mandated in the conditions of project approval from the CEQA lead agency.

Western burrowing owl habitat is usually found in annual and perennial grasslands, characterized by low-growing vegetation. The western burrowing owl is a subterranean nester that depends primarily on the presence of burrowing mammals that excavate and leave their burrows open such that the burrows are accessible to western burrowing owls. California ground squirrel (*Otospermophilus beecheyi*) burrows are most commonly used by this owl for nesting and cover throughout its nesting range in California. This owl can also use other burrows created by larger burrowing mammals such as the American badger (*Taxidea taxus*) that leave their burrows open and accessible for use by this owl. They may also occasionally use man-made objects such as concrete culverts or rip-rap piles for cover. This owl rarely excavates its own burrows, although Mr. Geoff Monk of M&A has observed shallow excavations in sandy soils by this owl in Solano and Eastern Contra Costa Counties.

Western burrowing owls exhibit high site fidelity, reusing burrows year after year. Occupancy of suitable western burrowing owl habitat can be verified at a site by observation of these owls during the spring and summer months or, alternatively, its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement (whitewash) at or near a burrow. Western burrowing owls typically are not observed in grasslands with tall vegetation or wooded areas because the vegetation obscures their ability to detect avian and terrestrial predators. Since western burrowing owls spend the majority of their time sitting at the entrances of their burrows, grazed grasslands seem to be their preferred habitat because it allows them to view the world at 360 degrees without obstructions.


3. ANALYSIS OF PROJECT SITE CONDITIONS

In June 2002, the Applicant mass graded the 101 South Sonoma Business Park project site in accordance with all issued permits. This project site includes the Village project site. The project site is located on the Santa Rosa Plain which is not known to support the California ground squirrel due to its relatively level topography and high water table. Populations of California ground squirrel are absent on the Plain and it is only when one travels east or west of the Plain, into Sonoma County's hilly topography, that ground squirrel burrows can be observed on the slopes. Accordingly, the only burrow or burrow-like refugia on the Santa Rosa Plain more typically includes debris piles (e.g., downed wood, rock piles) and culvert openings, which very rarely constitute suitable burrowing owl nesting habitat. There are no debris piles or culvert openings on the project site that would constitute western burrowing owl habitat. Based on the absence of suitable donor burrows for nesting and/or habituation, and the complete absence of California ground squirrels or other larger burrowing mammals on the project site, as well as the complete absence of field observations of western burrowing owls on the project site during multiple surveys conducted over several years, no impacts to this species are expected to occur from implementation of the proposed project. There has been no evidence to date that the Santa Rosa Plain supports a breeding population of western burrowing owls. M&A does not believe that the western burrowing owl should be an issue on the Village Project Site.

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If you have any questions or require additional information, please do not hesitate to contact me at (925) 947-4867 ext. 203. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Lynch". The signature is written in a cursive, flowing style.

Sarah Lynch
Principal Biologist

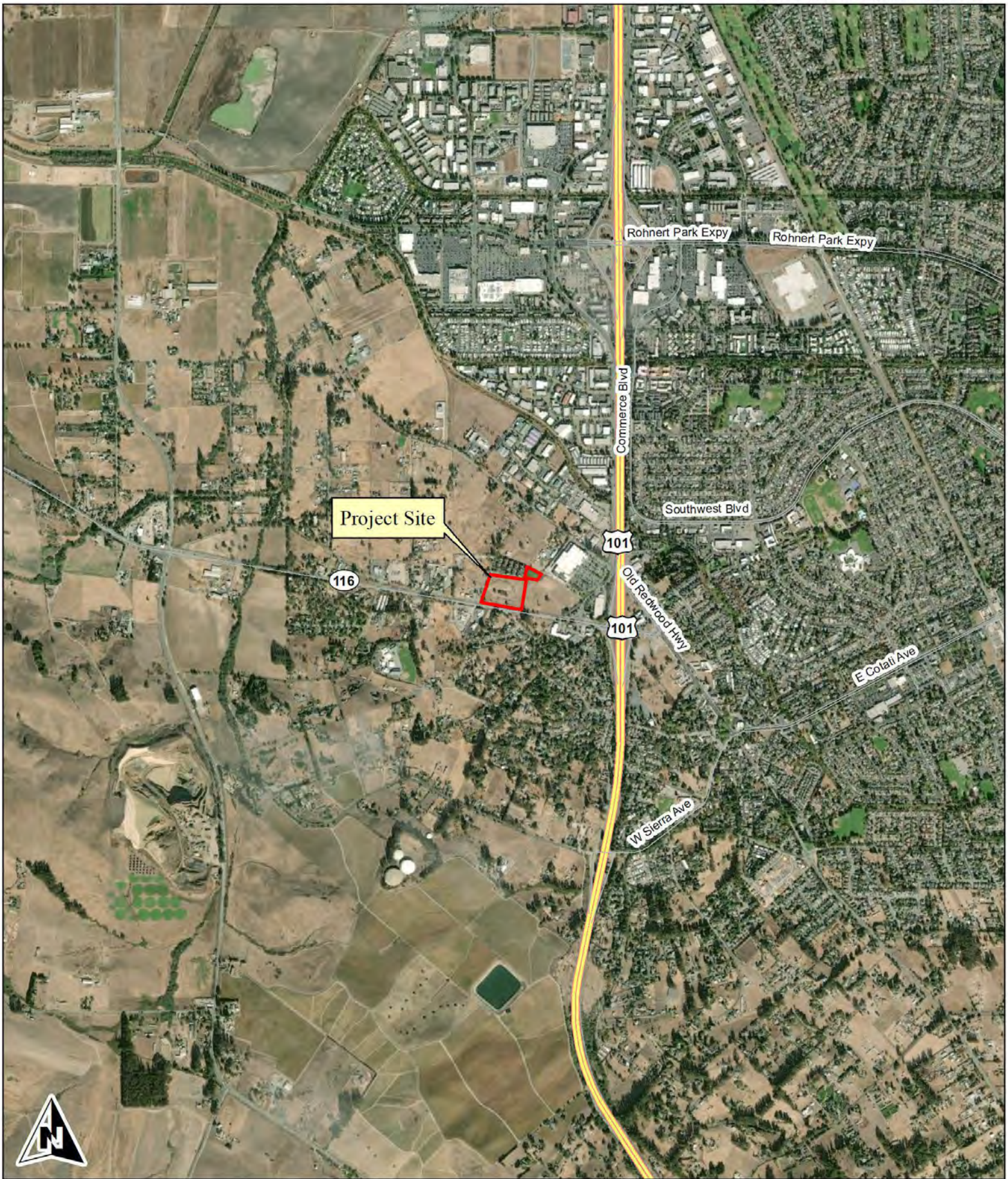
Attachments: Figures 1-3



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Figure 1. Cotati Village Project Site
 Regional Map
 Cotati, California

County: Sonoma
 Map Preparation Date: October 27, 2021



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Figure 2. Cotati Village Project Site
Location Map
Cotati, California

Section 23: T6N R8W
38.332748 -122.718971
7.5-Minute Cotati quadrangle
Aerial Photograph Source: ESRI
Map Preparation Date: October 27, 2021



Project Site

Alder Ave

Gravenstein Hwy

W Cotati Ave



0 50 100 200 300 400 500 Feet

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Figure 3. Aerial Photograph of the
Cotati Village Community Project Site
City of Cotati, California

Aerial Photograph Source: ESRI
Map Preparation Date: November 11, 2021