June 3, 2025

Attn: Dugan Garrison
Area Manager - Northern California
dugan.garrison@credegroup.com
980 9th Street Suite 2300
Sacramento, CA 95814

RE: Biological Resources Assessment Report for 20540 Broadway, Sonoma County, California

Dear Mr. Garrison,

The purpose of this letter is to provide a biological evaluation on behalf of Red Tail Multi Family Development (Client) for the proposed redevelopment project (Project) located at 20540 Broadway Avenue in the outskirts of the City of Sonoma, Sonoma County, California (Study Area). It is WRA's understanding that the property which contains numerous dilapidated structures, small residences and an abandoned vineyard is being considered by the Client for redevelopment as a multi-unit residential project. WRA completed a biological reconnaissance survey within the Study Area on January 28, 2025. The majority of the site is developed with residences, outbuildings and a fallow vineyard dominating the landcover. There are many small trees on the site, mostly consisting of non-native ornamental and agricultural species and more than two dozen, small native oaks.

This report evaluates the potential for the Study Area to support special-status species, sensitive vegetation communities, and aquatic features, and the potential for impacts to these biological resources as a result of the project within the framework of the California Environmental Quality Act (CEQA). Based on the results of the site assessment, potential impacts to sensitive land cover types and special-status species resulting from the proposed project were evaluated. If the project has the potential to result in significant impacts to sensitive biological resources, measures to avoid, minimize, or mitigate for those significant impacts are described. This report has been updated from its original version to include results of rare plant surveys conducted on June 2, 2025, which had negative findings.

1.0 METHODS

Prior to the site visits, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive biological communities (e.g., wetlands and streams) and special-status species (e.g., endangered plants and animals), including:

- National Wetlands Inventory (USFWS 2025a)
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2025a)
- California Native Plant Society Inventory of Rare Plants (CNPS 2025a)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (USFWS 2025b)
- Web Soil Survey (CSRL 2025)
- Healdsburg 7.5-minute U.S. Geological Survey (USGS) quadrangle (USGS 2025)
- Contemporary aerial photographs (Google Earth 2025)
- Historical aerial photographs (NETR 2025)
- California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)

Database searches (i.e., CNDDB, CNPS) for special-status species focused on the Sonoma, Glen Ellen, Petaluma River, Sears Point USGS 7.5-minute quadrangles. Species database search results are provided in Attachment 2.

On January 28, 2025 a WRA, Inc. (WRA) senior biologist and a botanist/wetland specialist visited the Study Area to document: (1) land cover types (e.g., terrestrial communities, aquatic resources), (2) existing conditions and to determine if such provided suitable habitat for any special-status plant or wildlife species, (3) if and what type of aquatic natural communities (e.g., wetlands, streams) were present, and (4) if special-status species were present. The Study Area was reviewed for the presence of aquatic resources including wetlands and unvegetated waters of the State and waters of the U.S. Methods for identifying these areas relied on the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987), Arid West Regional Supplement (Corps 2008), A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (Lichvar & McColley 2008), Corps of Engineers Regulatory Guidance Letter 05-05 (Corps 2005), and related documentation.

2.0 REGULATORY SETTING

2.1 Local Land Use and Policy

The Study Area is within the City of Sonoma and is subject to the City of Sonoma 2020 General Plan and Sonoma Municipal Code (Municipal Code) requirements (City of Sonoma 2020, City of Sonoma 2025). General Plan Policies and City Code sections relevant to biological resources in the Study Area are included below.

2.1.1 Sonoma General Plan and Municipal City Code Sections

The City of Sonoma 2020 General Plan contains overarching policies that prioritize conservation of wetlands, Sonoma Valley watershed resources, special-status plants and wildlife, and tree preservation. The General Plan was consulted during this assessment and the following City Code sections were determined to be relevant to this Project.

City of Sonoma 2020 General Plan

The City of Sonoma's 2020 General Plan, adopted in 2006, outlines several environmental policies aimed at preserving the city's natural resources and maintaining its small-town character. Key environmental goals relevant to this project include:

- Goal ER-1: Acquire and protect important open spaces in and around Sonoma.
    - Support regulations that limit urban sprawl and protect greenbelts.
- Goal ER-2: Identify, preserve, and enhance significant habitat areas and environmental resources.
    - Conduct environmental impact assessments for new developments.
    - Implement mitigation measures to offset habitat disturbance.
    - Restore and enhance degraded natural areas, such as riparian corridors and native grasslands.
- Goal ER-3: Conserve natural resources to ensure their long-term sustainability.
    - Promote the use of renewable energy sources such as solar power.
    - Implement water conservation strategies, including drought-resistant landscaping.
    - Support recycling and composting programs to minimize landfill waste.
    - Encourage green building practices and sustainable land use planning.

These goals are detailed in the Environmental Resources Element of the General Plan, which emphasizes the importance of open space acquisition, habitat preservation, resource conservation, and recreational planning.

City of Sonoma Municipal Codes

Chapter 12.08 – Tree Ordinance

12.08.032 – Significant Trees.

> It is unlawful for any person other than those authorized under emergency circumstances, as set forth within this chapter, to alter, remove, relocate, or cause to be altered, removed or relocated any significant tree or significant tree, private, as defined in this chapter, unless and until a written permit to do so has first been obtained in accordance with SMC 12.08.050. Any such permit may be declared void by the public works director if its terms are violated. (Ord. 11-2009 § 1(6), 2009; Ord. 09-2003 § 1, 2003).

Chapter 12.08.035 – Applications for New Development

D. Tree Information Required at Time of Application. An arborist's report, prepared by an ISA (International Society of Arboriculture) certified arborist, shall be a requirement of all new development. The report shall provide the necessary information to determine the appropriate extent of tree preservation and protection and tree replacement requirements.

An arborist shall be selected and retained by the city planner from a list of qualified members provided by the tree committee. All costs and fees for the services of the arborist shall be paid by the applicant and shall be paid in full at the time of the project application.

The requirement of an arborist's report may be waived by the determination of the city planner upon the finding of no significant trees on:

1. The project site;

2. On adjoining property that could reasonably be affected by the project construction.

The arborist's report shall clearly describe in writing all trees on the property. The report shall indicate the genus and species, the shape, the trunk diameter of each tree and the nonintrusion zone around each tree as determined by the table in SMC 12.08.020(H), and shall indicate those trees which are proposed to be altered, removed, or relocated and the reasons therefor. Tree delineations by trunk location and an accurate outline of each tree's nonintrusion zone must be shown on the project site plan or tentative map, and on every page of the development and improvement plans where any work is proposed within the nonintrusion zone of any protected tree. The property owner of the property and the person in control of the proposed development shall protect and preserve each tree situated within the site of the proposed development during the period the application(s) for the proposed development is being considered by the city.

E. Tree Replacement Program. A person owning or controlling a new development project shall be required to replace trees designated for removal as part of the approval of the project in accordance with the conditions of approval established by the planning commission or the design review and historic preservation commission as follows:

1. Unless otherwise approved by the review authority, tree replacement shall occur on-site and shall, at a minimum, occur at a 1:1 ratio and a 15-gallon box size for each six inches of tree diameter removed.

2. If the development site is inadequate in size to accommodate the replacement trees, the trees may be planted on public property with the approval of the public works director.

3. Upon the request of the developer and the approval of the city council, the city may accept an in-lieu payment of $100.00 per 15-gallon replacement tree on condition that all such payments shall be used for tree-related educational projects and/or planting programs of the city.

F. Protected Trees. Development of a property on which a protected tree is located shall be subject to project design and construction requirements including, but not limited to, subsections (F)(1) through (F)(6) of this section. All applicable project design and construction requirements related to the protection of trees shall be implemented in accordance with accepted ISA guidelines, unless modified or waived by the director of public works in consultation with the project arborist.

1. Before the start of any clearing, excavation, construction or other work on the site, every protected tree shall be securely fenced off at the nonintrusion zone, or other limit as may be established in the field by the project arborist. Such fences shall remain continuously in place for the duration of all work undertaken in connection with the development. The area so fenced off shall not be used as a storage area or altered or disturbed except as may be permitted under this subsection.

2. If the proposed development, including any site work for the development, will encroach upon the nonintrusion zone of a protected tree, special measures shall be utilized, as approved by the project arborist, to allow the roots to obtain oxygen, water, and nutrients as needed.

3. Underground trenching for public improvements shall avoid major support and absorbing tree roots of protected trees. If avoidance is impractical, tunnels shall be made below the roots. Trenches shall be consolidated to service as many units as possible. Trenching or any other excavation related to the project within the drip line of protected trees shall be avoided to the greatest extent possible and shall only be done under the on-site directions of a project arborist.

4. Concrete or asphalt paving shall not be placed over the root zones of protected trees, unless otherwise permitted by the project arborist. Artificial irrigation shall not occur within the root zone of oaks, unless deemed appropriate by the project arborist to improve tree vigor or mitigate root loss.

5. Compaction of the soil within the nonintrusion zone of protected trees shall be avoided, if possible. Any excavation, cutting, filling, or compaction of the existing ground surface within the nonintrusion zone shall be minimized and subject to such conditions as may be imposed by the project arborist.

6. Burning or use of equipment with an open flame near or within the nonintrusion zone shall be avoided. All brush, earth and other debris shall be removed in a manner which prevents injury to the protected tree. Oil, gas, chemicals or other substances that may be harmful to trees shall not be stored or dumped within the nonintrusion zone of any protected tree, or at any other location on the site from which such substances might enter the nonintrusion zone of a protected tree. Construction materials shall not be stored within the nonintrusion zone of a protected tree. (Ord. 06-2013 § 3, 2013; Ord. 11-2009 § 1(7), (8), (9), 2009; Ord. 09-2003 § 1, 2003; Ord. 96-11, 1996)

Chapter 12.08.050 – Tree Alteration or Removal or Relocation Permits

A. Any person desiring to alter, remove or relocate any tree(s) for which a permit is required under the provisions of SMC 12.08.030(B) or 12.08.032 shall make application upon an appropriate city form to the public works director. The applicant may also submit documentation of any type, including written recommendations from a certified arborist, concerning the health and quality and the desirability of alternatives (e.g., relocation or alteration) to the removal of each tree.

1. The granting or denying of a tree removal permit should be based upon reasonable standards including:

a. The condition of the tree with respect to its general health, structural condition, hazards potential and proximity to existing or proposed structures;

b. The necessity of the tree removal to allow construction of improvements or otherwise allow economic or other reasonable enjoyment of the property;

c. The number, species, age, size and location of existing trees in the area and the effect of the requested removal on shade areas, air pollution, historic values, scenic beauty, and the general welfare of the city as a whole.

2. The review and permit process is not intended to prevent the necessary removal of trees for safety purposes, but is intended to provide a forum in which the value (i.e., shade, appearance, etc.) of the tree or trees proposed for removal can be measured against the reasons for which the applicant desires to have it altered, removed or relocated. Replacement trees should normally be required to mitigate the loss of the tree.

B. Prior to making a determination on the application, the tree committee shall inspect the tree(s) sought to be altered, removed or relocated. The tree committee may also refer the

application to another department, commission or committee of the city, as they deem appropriate, and may require the applicant to provide additional information which they deem necessary in order to make an informed decision on the application. However, the tree committee shall render a decision on the application within 30 days of its referral to the committee by the public works director.

C. If the tree committee approves an application to alter, remove, or relocate a tree, it shall direct the public works director to issue a permit, subject to such conditions as the committee deems appropriate, which may include the planting of replacement trees.

D. A permit granted under the provisions of this section shall be valid for a period of 60 days from the date of issuance unless a longer period is stated in the permit, or an additional 60 days' extension is granted by the public works director. If the work authorized by the permit is not commenced prior to the expiration date, the permit shall become null and void. Once the work authorized by a permit is commenced, it shall be expeditiously pursued to completion. (Ord. 11-2009 § 1(12), (13), 2009; Ord. 09-2003 § 1, 2003; Ord. 96-11, 1996).

2.2 Sensitive Natural Communities

Sensitive natural communities include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" (CDFW 2023) and keeps records of their occurrences in its California Natural Diversity Database (CNDDB; CDFW 2025b). Vegetation alliances are ranked 1 through 5 in the CNDDB based on NatureServe's (2025) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must be considered and evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). Sensitive natural communities also include streams, lakes and associated riparian vegetation protected by CDFW under Sections 1600-1616 of California Fish and Game Code (CFGC). In addition, this general class includes oak woodlands that are in some cases protected by local oak woodland ordinances, and/or general plan policies.

2.3 Wetlands, Streams and Aquatic Areas

The U.S. Army Corps of Engineers (Corps) regulates "Waters of the U.S." under Section 404 of the Clean Water Act. Waters of the U.S. are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all non-wetland waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The SWRCB and nine RWQCB protect waters within this broad regulatory scope through many different regulatory programs. Regulated areas under these programs include wetlands and unvegetated water bodies (such as lakes and streams) meeting defined criteria described in the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) and related

Supplements and Regulatory Guidance Letters. Waters of the State include wetlands and other surface waters protected by the *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* (SWRCB 2019).

2.4 Special-Status Species

This report assesses the presence and potential presence of species protected by a range of federal and state laws and regulations. Specific species of plants, fish, and wildlife species may be designated as threatened or endangered by the federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA). The ESA also provides for designation of critical habitat, which are specific geographic areas containing physical or biological features "essential to the conservation of the species." Specific protections and permitting mechanisms for these species differ under each of these acts, and a species' designation under one law does not automatically provide protection under the other. California Fish and Game Code also includes lists of "Fully Protected Species", which includes specific lists of birds, mammals, reptiles, amphibians, and fish designated in CFGC. Special protections for nesting birds and breeding bats are also provided by the Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, and sections 3503, 3503.5 and 3513 of California Fish and Game Code. Under these laws/codes, the intentional harm or collection of adult birds as well as the intentional collection or destruction of active nests, eggs, and young is illegal.

Under the California Native Plant Protection Act (NPPA), CDFW has listed 64 "rare" or "endangered" plant species, and prevents "take", with few exceptions, of these species. Plant species on the CNPS Rare and Endangered Plant Inventory (Inventory; CNPS 2021a) with California Rare Plant Ranks (Rank) of 1 and 2, as well as some Rank 3 species, are also considered special-status plant species and must be considered under CEQA. Rank 4 and some Rank 3 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare.

2.5 Additional CEQA-Specific Protections

To address additional species protections afforded under the California Environmental Quality Act (CEQA), CDFW has developed a list of special species as "a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status." This list includes lists developed by other organizations, including for example, the Audubon Watch List Species, the Bureau of Land Management Sensitive Species, and USFWS Birds of Special Concern. Additionally, any species listed as sensitive within local plans, policies and ordinances are sensitive under CEQA. Movement and migratory corridors for native wildlife (including aquatic corridors) as well as wildlife nursery sites are given special consideration under CEQA.

3.0 SITE DESCRIPTION, VEGETATION COMMUNITIES AND LAND COVER TYPES

The approximately 4.95-acre Study Area is located in southern Sonoma, off Broadway Avenue/California State Route 12, Sonoma County; approximately 15 miles east of U.S. highway 101 and 1.3 miles south of the Sonoma Plaza. The Area surrounding the Study Area is predominantly developed and includes commercial, agricultural, and residential areas. Areas

beyond these, especially to the southwest are dominated by agricultural use (vineyard, orchard, and livestock grazing).

During the site visit, WRA evaluated the species composition and area occupied by distinct vegetation communities, aquatic communities, and other land cover types. Mapping of these classifications utilized a combination of aerial imagery and ground surveys. Communities are characterized and mapped based on distinct shifts in plant assemblage (vegetation) and follow Manual of California Vegetation, Online Edition membership rules where relevant (CNPS 2025b). These resources cannot anticipate every component of every potential vegetation assemblage in California, and so in some cases, it is necessary to identify other appropriate vegetative classifications based on best professional judgment of WRA biologists. The site visit included a focused evaluation of the entire 4.95-acre Study Area.

WRA observed five non-sensitive land cover types within the Study Area, listed in Table 1, below, including Ruderal-fallow vineyard, developed, landscaped, Himalayan blackberry (*Rubus armeniacus*) patch, and white poplar (*Populus alba*) patch.

Table 1. Vegetation Communities and Land Cover Types

COMMUNITY / LAND COVERS	SENSITIVE STATUS	RARITY RANKING	ACRES WITHIN STUDY AREA
TERRESTRIAL COMMUNITY / LAND COVER			
Ruderal – Fallow Vineyard	Non-Sensitive	None	3.67
Developed	Non-Sensitive	None	0.65
Landscaped	Non-Sensitive	None	0.41
Himalayan blackberry patch	Non-Sensitive	None	0.12
White poplar patch	Non-Sensitive	None	0.10
AQUATIC RESOURCES			
None	N/A	N/A	N/A

3.1 Terrestrial Communities

Ruderal – Fallow Vineyard (no vegetation alliance). CDFW Rank: None. The majority of the Study Area consists of a former vineyard that has been inactive for years and has since gone fallow, becoming dominated by ruderal vegetation. The Study Area contains approximately 3.67 acres of ruderal-fallow vineyard. This land cover type is characterized primarily by non-native, weedy annual species, with little to no understory. Scattered trees, including valley oak (*Quercus lobata*) and coast live oak (*Q. agrifolia*), are present throughout the habitat. These trees, mostly small (six inches or less in diameter at breast height [DBH]), have established through natural successional processes following the abandonment and lack of management of the vineyard.

Also scattered throughout this landcover type are small, non-native ornamental trees, including cultivated varieties of cherry, almond, and plum (Prunus spp.). Dominant species observed include ripgut brome (*Bromus diandrus),* yellow star thistle (*Centaurea solstitialis*), stinkwort (*Dittrichia graveolens*), wild carrot (*Daucus carota*), cutleaf geranium (*Geranium dissectum*), short-podded mustard (*Hirschfeldia incana*), narrow-leaved wild lettuce (*Lactuca saligna*), ribwort (*Plantago lanceolata*), wild radish (*Raphanus sativus*), cultivated grape (*Vitis vinifera*), and spring vetch (*Vicia sativa*). Occasional coyote brush (*Baccharis pilularis*), and one mature valley oak is present along the southwestern portion of the Study Area.

Developed (no vegetation alliance). CDFW Rank: None. Developed areas are areas which include structures and features associated with human activities and no longer perform the same habitat functions as natural biological communities. The Study Area contains approximately 0.65 acres of developed area. Within the Study Area, about 1/8 of the parcel is best classified as developed and/or disturbed, consisting of areas that are occupied by structures (residential and farm-related storage building and amenities) and associated paved and graveled driveway areas.

Landscaped (no vegetation alliance). CDFW Rank: None. The Study Area contains approximately 0.41 acres of landscaped area. The landscaped areas within the Study Area include lawns, planted ornamental trees, and herbaceous garden ornamentals. Vegetation within landscaped areas include glossy privet (*Lingustrum lucidum*), pines (*Pinus* spp.) ornamental shrub/trees (e.g., maple [Acer sp.], cotoneaster [cotoneaster sp.],) and non-native grass-dominated lawns.

Himalayan Blackberry Bramble Patch (no vegetation type). Non-sensitive. CDFW Rank: None. The Study Area contains 0.12 acres of Himalayan blackberry bramble patch. This land cover type is almost entirely made up of dense, brambling Himalayan blackberry canes.

White Poplar Patch (no vegetation type). Non-sensitive. CDFW Rank: None. The Study Area contains a 0.10-acre patch of ornamental white poplar. This land cover type is characterized by planted ornamental white poplar, with an understory primarily composed of barren ground and leaf litter, interspersed with traces of non-native grasses and forbs.

3.2 Aquatic Resources

The Study Area does not contain any jurisdictional wetlands or non-wetland waters of the U.S. or State.

4.0 SENSITIVE PLANT SPECIES

The entirety of the Study Area was surveyed for the presence of special-status and sensitive species during the site visit; however, the Study Area consists of previously developed/disturbed areas, which do not contain habitat for most special-status plant species, and ruderal herbaceous grassland contains only marginal habitat for a few special-status plant species.

Based upon a review of the resource databases (CNPS and CNNDB RareFind5), for the four USGS 7.5-minute quadrangles surrounding the Study Area, a total of 49 special-status plant species have been documented in the vicinity of the Study Area. Of these 48 special-status plant species, most were determined to have no potential to occur within the Study Area for one or more of the following reasons:

- The Study Area is predominantly covered by previously developed/disturbed areas, and ruderal herbaceous grassland that is routinely mowed.
- Hydrologic conditions (e.g., seasonal wetlands, vernal pools, marshes and swamps) necessary to support the special-status plant species are not present in the Study Area;
- Edaphic (soil) conditions (e.g., volcanic, serpentine) necessary to support the special-status plant species are not present in the Study Area;
- Topographic conditions (e.g., slopes) necessary to support the special-status plant species are not present in the Study Area;
- Unique pH conditions (e.g., alkali wetlands) necessary to support the special-status plant species are not present in the Study Area;
- Associated natural communities (e.g., vernal pools, chaparral, woodlands) necessary to support the special-status plant species are not present in the Study Area.

Of the special-status species that are documented within the vicinity of the Study Area, one plant, congested hayfield tarweed (*Hemizonia congesta* ssp. *congesta*; Rank 1B.2), has a moderate potential to be present within the Study Area.

Special-status Plants with the Potential to Occur, but Presence Unknown

Hayfield tarplant (*Hemizonia congesta* ssp. *congesta*). Rank 1B.2. Moderate Potential. Hayfield tarplant is an annual herb in the sunflower family (Asteraceae). It is typically found in coastal scrub and in valley and foothill grassland, often if fallowed fields, and it has sometimes been found along roadsides. It occurs at elevations from 65 to 1,837 feet, and it blooms from April to November (CNPS 2025b). Observed associated species include ribwort, hairy cats ear (*Hypochaeris radicata*), birdsfoot trefoil (*Lotus corniculatus*), rattlesnake grass (*Briza maxima*), and ripgut brome (CDFW 2025). The nearest known CNDDB occurrence is located 0.3 aerial miles east of the Study Area (CNDDB 2025); however, the only available record for this occurrence dates back to 1909. On June 2, 2025, a WRA biologist performed a rare plant survey of the Study Area, focused on this species, which was confirmed at other sites to be in bloom. No hayfield tarplants or any other special status plants were detected during the surveys and as such, special status plants are considered absent.

5.0 SENSITIVE WILDLIFE SPECIES

Sensitive wildlife species within the vicinity of the Study Area were identified using database queries of four USGS 7.5-minute quadrangles surrounding the Study Area (encompassing a minimum 5-mile radius). Of the 52 special-status wildlife species documented in the vicinity of the Study Area, most were excluded based on a lack of habitat features. Features not found within the Study Area that are required to support special-status wildlife species include:

- Aquatic habitats (e.g., seasonal wetlands, ponds, lakes, rivers, streams, estuaries, vernal pools) necessary to support the species are not present in the Study Area;
- Vegetation habitats (e.g., coast redwood forest, coastal prairie) that provide nesting and/or foraging resources necessary to support the species are not present in the Study Area;
- Physical structures and vegetation (e.g., mines, old-growth coniferous trees) necessary to provide nesting, cover, and/or foraging habitat to support the species are not present in the Study Area;

- Host plants necessary to provide larval and nectar resources for the species are not present in the Study Area;
- The Study Area is outside (e.g., north of, west of) of the species documented range of occurrence.

Of the special-status wildlife species documented in the vicinity, all except two species of bat (pallid bat, *Antrozous pallidus*; and Townsend's big-eared bat, *Corynorhinus townsendii*) and one bird (white-tailed kite, *Elanus leucurus*) were determined to be unlikely or have no potential to occur within the Study Area. The site contains previously developed/disturbed areas that lack habitat for special-status wildlife species, and periodically mowed ruderal and fallow field with minimal trees which contains habitat for common non-special status nesting birds. Non-status bats may use some of the structures onsite for roosting, including maternity roosts, which are protected under CDFG code.

Special-status Wildlife with the Potential to Occur, but Presence Unknown

Pallid bat (*Antrozous pallidus*). CDFW Species of Special Concern, WBWG High Priority. Moderate Potential. Pallid bats are distributed from southern British Columbia and Montana to central Mexico, and east to Texas, Oklahoma, and Kansas. This species occurs in a number of habitats ranging from rocky arid deserts to grasslands, and into higher elevation coniferous forests. Roosts are typically in rock crevices, tree hollows, mines, caves, and a variety of man-made structures, including vacant and occupied buildings. Tree roosting has been documented within snags and basal hollows of conifers, and within bole cavities in oak trees. Pallid bats are primarily insectivorous, feeding on large prey that is usually taken on the ground but sometimes in flight. Prey items include arthropods such as scorpions, ground crickets, and cicadas (WBWG 2025). The structures within the Study Area did not show any evidence of bat occupation (urine stains, fecal material etc.), however, some of the structures did have openings that could allow bats to enter the buildings. Therefore, pallid bat has a moderate potential to occur within the Study Area.

Townsend's big-eared bat, (*Corynorhinus townsendii*), CDFW Species of Special Concern, WBWG High Priority. Moderate Potential. This species ranges throughout western North America from British Columbia to central Mexico. Its local distribution is strongly associated with the presence of caves, but roosting also occurs within man-made structures including mines and buildings. While many bats species wedge themselves into tight cracks and crevices, big-eared bats hang from walls and ceilings in the open. Males roost singly during the spring and summer months while females aggregate in the spring at maternity roosts to give birth. Females roost with their young until late summer or early fall, until the young become independent, flying and foraging on their own. In central and southern California, hibernation roosts tend to be made up of small aggregations of individuals (Pierson and Rainey 1998). Foraging typically occurs along edge habitats near streams and wooded areas, where moths are the primary prey (WBWG 2015). The structures within the Study Area did not show any evidence of bat occupation (urine stains, fecal material etc.) however, some of the structures did have openings that could allow bats to enter the buildings. Therefore, Townsend's big-eared bat has a moderate potential to occur within the Study Area.

White-tailed kite (*Elanus leucurus*), CDFW Fully Protected Species. Moderate Potential. Kites occur in low elevation grassland, agricultural, wetland, oak woodland, and savannah habitats. Riparian zones adjacent to open areas are also used. Vegetative structure and prey availability seem to be more important than specific associations with plant species or vegetative communities. Lightly grazed or ungrazed fields generally support large prey populations and are often preferred to other habitats. Kites primarily feed on small mammals, although, birds, reptiles, amphibians, and insects are also taken. Nest trees range from single isolated trees to trees within large contiguous forests. Preferred nest trees are extremely variable, ranging from small shrubs (less than 10 feet tall), to large trees (greater than 150 feet tall) (Dunk 1995). There is a moderate potential for White-tailed kite to occur in the Study Area due to the presence of suitable nesting sites and adjacent grassland and agricultural fields provide open foraging habitat.

6.0 Protected Trees

The Study Area contains twelve valley oaks and two coast live oaks which are large enough (i.e., native oaks with a trunk circumference of 24 inches [7.6 inches in diameter] or greater in size to be considered a "significant" tree per the City of Sonoma Tree Municipal Code. A tree removal permit will be required to remove this tree if necessitated by the Project design.

7.0 LOCAL BIOLOGICAL RESOURCE PLANS AND POLICIES

Redevelopment of the Study Area does not conflict with any local plans or policies pertaining to biological resources. The site lacks wetlands, vernal pools, rare wildlife habitats, rare plant habitats and waterways identified as sensitive in the General Plan with the exception of a small peripheral area that is mapped as a riparian buffer, but in fact does not serve riparian functions (see section 9). Removal of native trees present within the Study Area, if proposed, will comply with the City of Sonoma Municipal Tree Ordinance (Chapter 12.08.032, .035, & .050).

8.0 WILDLIFE CORRIDORS

To account for potential impacts to wildlife movement/migratory corridors, WRA reviewed habitat connectivity mapping data from the California Essential Connectivity Project by Caltrans (2010) and CDFW's Biogeographic Information and Observation System (BIOS) (CDFW 2025b). Additionally, aerial imagery (Google Earth 2025) for the local area was referenced to assess if local core habitat areas were present within or connected to the Study Area. This assessment was refined based on observations of on-site physical and/or biological conditions, including topographic and vegetative factors that can facilitate wildlife movement, as well as on-site and off-site barriers to connectivity.

The Study Area is not within a documented wildlife movement corridor or mapped "natural landscape block" by CDFW (2025b). As such, it provides no regionally significant wildlife movement functions, though common urban species are likely to forage within or transit through the site.

9.0 FINDINGS AND RECOMMENDATIONS

Based on our site visit and review of the proposed Project, the Project does not have the potential to result in significant impacts to biological resources. The sections below contain a summary and recommendations (if appropriate) for best management practices to employ as part of the project to comply with existing laws and regulations relevant to biological resources for the Project.

9.1 Special-Status Species

Upon review of existing conditions, species distributions, and habitat requirements, one special-status plant two special status bats and one special status bird are assessed as having a moderate or high potential to occur within the Study Area. The following avoidance measures will reduce the potential for impacts to wildlife and plant species to a less than significant level.

Nesting birds, including white-tailed kite: CFGC prohibits disturbance to active nest sites for native nesting birds, which may be present in trees within the Study Area (including those adjacent to development elements). WRA recommends that the removal of trees and other vegetation (including tree trimming, if needed) occur from September 1 to January 31, outside of the general bird nesting season. If tree/vegetation removal during this time is not feasible, a pre-construction nesting bird survey should be performed by a qualified biologist no more than 14 days prior to the initiation of Project activities. The survey should cover the Study Area described herein plus a 200-foot buffer for non-status passerine birds and a 1,000-foot buffer for white-tailed kite and other raptors, where access is allowed. Binoculars and/or spotting scopes shall be used to survey adjacent areas that cannot be accessed by foot. If active bird nests are found during the survey, an appropriate no-disturbance buffer should be established by the qualified biologist. Buffer sizes may vary dependent on bird species, location and setting of the nest, levels of ambient disturbance near the nest, and other factors. Once it is determined that the young have fledged (left the nest) or the nest otherwise becomes inactive (e.g., due to predation), the buffer may be removed and work may be initiated within the former buffer.

Special-status bats and all bat maternity roosts: Bat maternity roosts, including those of species of special concern are protected by existing CFGC. To avoid impacts to active maternity roosts, WRA recommends that demolition of buildings on the site be conducted outside of the maternity season, which is generally considered to be between February 1 and September 1. If demolition cannot occur outside this timeframe, it is recommended that a qualified biologist survey the Study Area for maternity roosts at least 30 days prior to anticipated demolition. If maternity roosts are detected, demolition shall not occur until a follow up survey has determined that the maternity roosts have become inactive; defined as all young being independent of their parents with respect to feeding and other critical care. Once maternity roosts, if present, are no longer active, demolition can occur following the procedures described in part to of this recommendation (see paragraph below). If no maternity roosts are detected but conditions within the Study Area are conducive to supporting maternity roosts, the bat biologist shall make recommendations to make the potential maternity roost sites unsuitable for this use. These may include closing up entry points or opening up areas to reduce thermal stability to prevent colonization of bats in advance of demolition.

To avoid significant impacts to special-status bats, prior to demolition, at any time of the year, it is recommended that a preconstruction survey be conducted within 7 days of commencement of demolition by a qualified bat biologist. This survey will inspect all structures for the presence

of bats. If bats are detected, the bat biologist will recommend exclusion techniques, if appropriate. Regardless of detection of bats, structures suitable to support bats shall be demolished and allowed to sit overnight before clearance of associated debris to allow any bats to self-relocate overnight.

Special-status plants: prior versions of this report recommended that a targeted survey for hayfield congested tarweed be conducted during the blooming period (April - November) for the plant and if it is detected, it should be avoided. If it is present and cannot be avoided, additional CEQA evaluation may be needed to determine appropriate mitigation. The recommended survey was performed on June 2, and no hayfield congested tarweed was detected. As such, special status plants are considered absent from the site and no additional surveys or measures to protect them are recommended.

9.2 Sensitive Vegetation and Aquatic Communities

The project will result in no impact to sensitive vegetation communities. A non-jurisdictional roadside drainage swale may be impacted as part of the Project, but as described above in Section 3.2, this feature is exempt from Waters of the U.S. and Waters of the State definitions and is not considered a sensitive feature.

9.3 Local Plans and Policies

Tree ordinance: The Study Area contains 12 valley oaks and two coast live oaks that are large enough (i.e., trunk circumference of 24 inches or greater/7.6 inches in diameter or greater) in size to be considered in the local tree ordinance. A tree removal permit will be required to remove trees if necessitated by the Project design. The CEQA lead agency may require an arborist report that identifies all trees on the site, their location and whether or not they will be removed.

Riparian Corridor buffer: The Study Area contains a small area (less than 1,500 square feet) that is designated as a riparian buffer by the County of Sonoma. These buffers are designated using GIS tools and do not necessarily reflect biologically significant areas. In this case, the WRA biologist assessed this small area as having no riparian habitat or function because there is over 150 feet of non-native ruderal grassland, absent of woody trees and shrubs, and a developed driveway between the Study Area and nearest riparian dripline. This area is located in the northeastern part of the site (Figure 2). Because impacts to this area, if needed, would not result in functional impacts to the greater riparian area that it is mapped as being part of, no recommendations for additional measures are included herein.

9.4 Wildlife Corridors

The Study Area is not within a mapped wildlife corridor and provides no significant wildlife movement functions. As such, the Project would have no impact on existing established wildlife corridors.

9.5 Habitat Conservation Plans

The Project is not within the covered area of a Habitat Conservation Plan. Therefore, the project would not conflict with the Strategy or any Habitat Conservation Plan.

While some best management practices may be warranted to comply with existing established Codes and standards, the Project would not result in any significant impacts to biological resources.

Sincerely,

Brian Freiermuth
Senior Associate Biologist

Attachments

Attachment 1. Figures
Figure 1. Study Area
Figure 2. Landcover and Sensitive Areas
Attachment 2. Species Database Search Results
Attachment 3. Site Photographs

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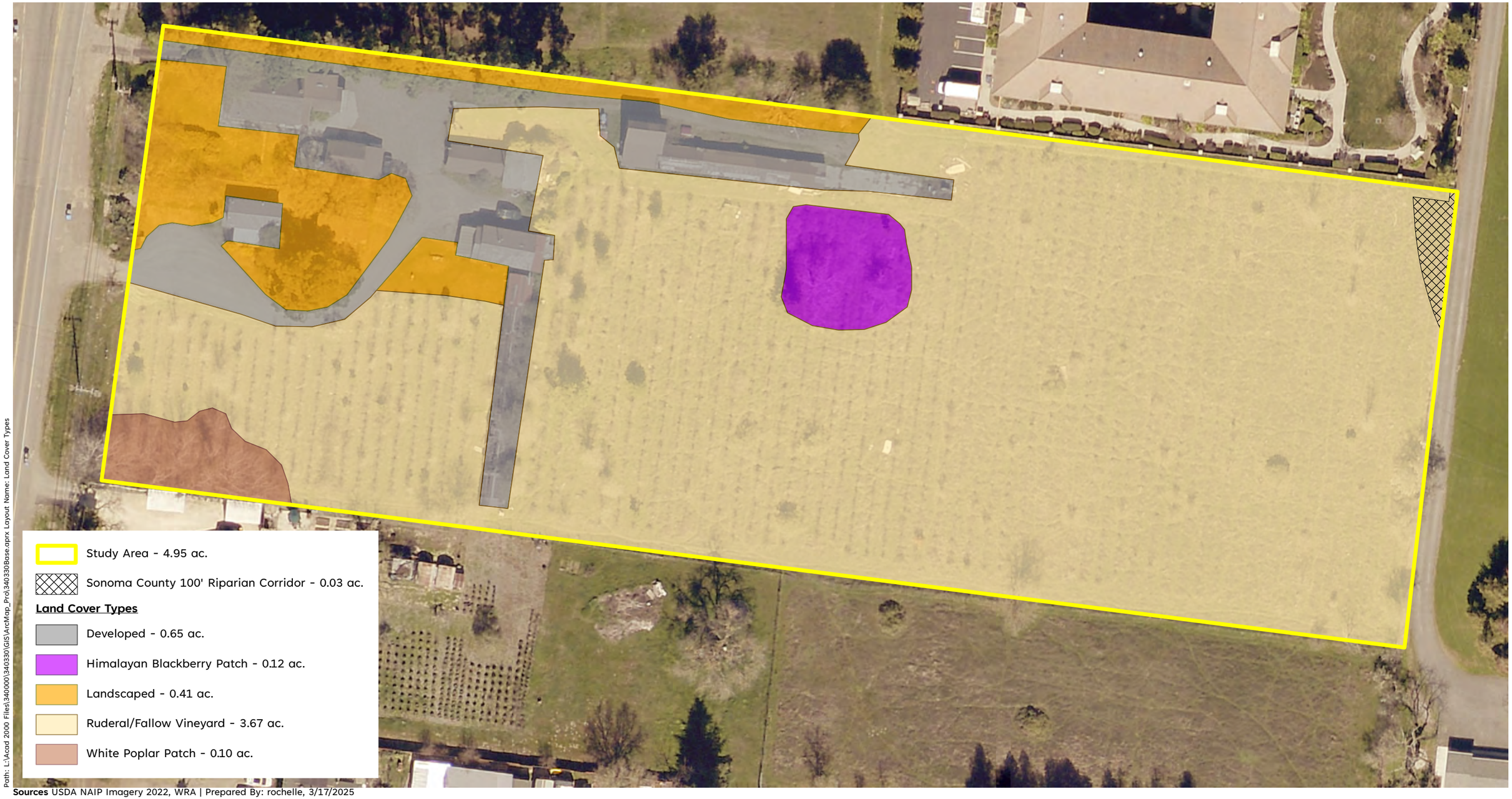
ATTACHMENT 1. FIGURES

Sources: National Geographic, WRA | Prepared By: rochelle, 3/17/2025

Figure 1. Study Area Regional Location Map

20540 Broadway Housing Development
City of Sonoma, Sonoma County, California

wra Environmental Consultants



Sources USDA NAIP Imagery 2022, WRA | Prepared By: rochelle, 3/17/2025

Figure 2. Land Cover Types in the Study Area

20540 Broadway Housing Development
City of Sonoma, Sonoma County, California

0 100 200 Feet

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wra Environmental Consultants

ATTACHMENT 2. SPECIES DATABASE SEARCH RESULTS

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Sonoma (3812234) OR Glen Ellen (3812235) OR Petaluma River (3812225) OR Sears Point (3812224))
 AND Taxonomic Group IS (Fish OR Amphibians OR Reptiles OR Birds OR Mammals OR Mollusks OR Arachnids OR Crustaceans OR Insects)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Accipiter cooperii Cooper's hawk	ABNKC12040	None	None	G5	S4	WL
Acipenser medirostris pop. 1 green sturgeon - southern DPS	AFCAA01031	Threatened	None	G2T1	S1	SSC
Actinemys marmorata northwestern pond turtle	ARAAD02031	Proposed Threatened	None	G2	SNR	SSC
Adela oplerella Opler's longhorn moth	IILEE0G040	None	None	G2	S2	
Agelaius tricolor tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S2	SSC
Ambystoma californiense pop. 3 California tiger salamander - Sonoma County DPS	AAAAA01183	Endangered	Threatened	G2G3T2	S2	WL
Ammodramus savannarum grasshopper sparrow	ABPBXA0020	None	None	G5	S3	SSC
Andrena blennospermatis Blennosperma vernal pool andrenid bee	IIHYM35030	None	None	G2	S1	
Antrozous pallidus pallid bat	AMACC10010	None	None	G4	S3	SSC
Aquila chrysaetos golden eagle	ABNKC22010	None	None	G5	S3	FP
Athene cunicularia burrowing owl	ABNSB10010	None	Candidate Endangered	G4	S2	SSC
Bombus caliginosus obscure bumble bee	IIHYM24380	None	None	G2G3	S1S2	
Bombus crotchii Crotch's bumble bee	IIHYM24480	None	Candidate Endangered	G2	S2	
Bombus occidentalis western bumble bee	IIHYM24252	None	Candidate Endangered	G3	S1	
Buteo regalis ferruginous hawk	ABNKC19120	None	None	G4	S3S4	WL
Buteo swainsoni Swainson's hawk	ABNKC19070	None	Threatened	G5	S4	
Caecidotea tomalensis Tomales isopod	ICMAL01220	None	None	G2	S2S3	
Calicina diminua Marin blind harvestman	ILARAU8040	None	None	G1	S1	

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Coccyzus americanus occidentalis western yellow-billed cuckoo	ABNRB02022	Threatened	Endangered	G5T2T3	S1	
Corynorhinus townsendii Townsend's big-eared bat	AMACC08010	None	None	G4	S2	SSC
Coturnicops noveboracensis yellow rail	ABNME01010	None	None	G4	S2	SSC
Cypseloides niger black swift	ABNUA01010	None	None	G4	S3	SSC
Danaus plexippus plexippus pop. 1 monarch - California overwintering population	IILEPP2012	Proposed Threatened	None	G4T1T2Q	S2	
Dicamptodon ensatus California giant salamander	AAAAH01020	None	None	G2G3	S2S3	SSC
Elanus leucurus white-tailed kite	ABNKC06010	None	None	G5	S3S4	FP
Eremophila alpestris actia California horned lark	ABPAT02011	None	None	G5T4Q	S4	WL
Falco columbarius merlin	ABNKD06030	None	None	G5	S3S4	WL
Falco peregrinus anatum American peregrine falcon	ABNKD06071	Delisted	Delisted	G4T4	S3S4	
Geothlypis trichas sinuosa saltmarsh common yellowthroat	ABPBX1201A	None	None	G5T3	S3	SSC
Hesperoleucus venustus subditus southern coastal roach	AFCJB19032	None	None	GNRT2	S2	SSC
Hydrochara rickseckeri Ricksecker's water scavenger beetle	IICOL5V010	None	None	G2?	S2?	
Laterallus jamaicensis coturniculus California black rail	ABNME03041	None	Threatened	G3T1	S2	FP
Linderiella occidentalis California linderiella	ICBRA06010	None	None	G2G3	S2S3	
Melospiza melodia samuelis San Pablo song sparrow	ABPBXA301W	None	None	G5T2	S2	SSC
Myotis thysanodes fringed myotis	AMACC01090	None	None	G4	S3	
Myotis volans long-legged myotis	AMACC01110	None	None	G4G5	S3	
Myotis yumanensis Yuma myotis	AMACC01020	None	None	G5	S4	
Oncorhynchus mykiss irideus pop. 8 steelhead - central California coast DPS	AFCHA0209G	Threatened	None	G5T3Q	S3	SSC
Rallus obsoletus obsoletus California Ridgway's rail	ABNME05011	Endangered	Endangered	G3T1	S2	FP

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Rana boylii pop. 1	AAABH01051	None	None	G3T4	S4	SSC
foothill yellow-legged frog - north coast DPS						
Rana draytonii	AAABH01022	Threatened	None	G2G3	S2S3	SSC
California red-legged frog						
Reithrodontomys raviventris	AMAFF02040	Endangered	Endangered	G1G2	S3	FP
salt-marsh harvest mouse						
Riparia riparia	ABPAU08010	None	Threatened	G5	S3	
bank swallow						
Sorex ornatus sinuosus	AMABA01103	None	None	G5T1T2Q	S1S2	SSC
Suisun shrew						
Speyeria zerene sonomensis	IILEPJ6083	None	None	G5T1	S1	
Sonoma zerene fritillary						
Spirinchus thaleichthys pop. 2	AFCHB03040	Endangered	Threatened	G5TNRQ	S1	
longfin smelt - San Francisco Bay-Delta DPS						
Syncaris pacifica	ICMAL27010	Endangered	Endangered	G2	S2	
California freshwater shrimp						
Talanites ubicki	ILARA98030	None	None	G1	S1	
Ubick's gnaphosid spider						
Taricha rivularis	AAAAF02020	None	None	G2	S2	SSC
red-bellied newt						
Taxidea taxus	AMAJF04010	None	None	G5	S3	SSC
American badger						
Tryonia imitator	IMGASJ7040	None	None	G2	S2	
mimic tryonia (=California brackishwater snail)						

Record Count: 51

Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database

Query Criteria: Quad IS (Sonoma (3812234) OR Glen Ellen (3812235) OR Petaluma River (3812225) OR Sears Point (3812224))
 AND Taxonomic Group IS (Ferns OR Gymnosperms OR Monocots OR Dicots OR Lichens OR Bryophytes)

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Allium peninsulare var. franciscanum Franciscan onion	PMLIL021R1	None	None	G4G5T2	S2	1B.2
Amorpha californica var. napensis Napa false indigo	PDFAB08012	None	None	G4T2	S2	1B.2
Astragalus tener var. tener alkali milk-vetch	PDFAB0F8R1	None	None	G2T1	S1	1B.2
Balsamorhiza macrolepis big-scale balsamroot	PDAST11061	None	None	G2	S2	1B.2
Blennosperma bakeri Sonoma sunshine	PDAST1A010	Endangered	Endangered	G1	S1	1B.1
Brodiaea leptandra narrow-anthered brodiaea	PMLIL0C022	None	None	G3?	S3?	1B.2
Ceanothus confusus Rincon Ridge ceanothus	PDRHA04220	None	None	G1	S1	1B.1
Ceanothus sonomensis Sonoma ceanothus	PDRHA04420	None	None	G2	S2	1B.2
Centromadia parryi ssp. parryi pappose tarplant	PDAST4R0P2	None	None	G3T2	S2	1B.2
Chloropyron maritimum ssp. palustre Point Reyes salty bird's-beak	PDSCR0J0C3	None	None	G4?T2	S2	1B.2
Chloropyron molle ssp. molle soft salty bird's-beak	PDSCR0J0D2	Endangered	Rare	G2T1	S1	1B.2
Chorizanthe valida Sonoma spineflower	PDPGN040V0	Endangered	Endangered	G1	S1	1B.1
Downingia pusilla dwarf downingia	PDCAM060C0	None	None	GU	S2	2B.2
Eriogonum luteolum var. caninum Tiburon buckwheat	PDPGN083S1	None	None	G5T2	S2	1B.2
Fritillaria liliacea fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
Hemizonia congesta ssp. congesta congested-headed hayfield tarplant	PDAST4R0W1	None	None	G5T2	S2	1B.2
Hesperolinon congestum Marin western flax	PDLIN01060	Threatened	Threatened	G1	S1	1B.1
Horkelia tenuiloba thin-lobed horkelia	PDROS0W0E0	None	None	G2	S2	1B.2

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Lasthenia conjugens Contra Costa goldfields	PDAST5L040	Endangered	None	G1	S1	1B.1
Legenere limosa legenere	PDCAM0C010	None	None	G2	S2	1B.1
Leptosiphon jepsonii Jepson's leptosiphon	PDPLM09140	None	None	G2G3	S2S3	1B.2
Lilium pardalinum ssp. pitkinense Pitkin Marsh lily	PMLIL1A0H3	Endangered	Endangered	G5T1	S1	1B.1
Lupinus sericatus Cobb Mountain lupine	PDFAB2B3J0	None	None	G2?	S2?	1B.2
Navarretia leucocephala ssp. bakeri Baker's navarretia	PDPLM0C0E1	None	None	G4T2	S2	1B.1
Plagiobothrys mollis var. vestitus Petaluma popcornflower	PDBOR0V0Q2	None	None	G4?TX	SX	1A
Polygonum marinense Marin knotweed	PDPGN0L1C0	None	None	G2Q	S2	3.1
Sidalcea calycosa ssp. rhizomata Point Reyes checkerbloom	PDMAL11012	None	None	G5T2	S2	1B.2
Streptanthus anomalus Mount Burdell jewelflower	PDBRA2G520	None	None	G1	S1	1B.1
Trifolium hydrophilum saline clover	PDFAB400R5	None	None	G2	S2	1B.2
Trifolium polyodon Pacific Grove clover	PDFAB402H0	None	Rare	G1	S1	1B.1
Viburnum ellipticum oval-leaved viburnum	PDCPR07080	None	None	G4G5	S3	2B.3

Record Count: 31

ATTACHMENT 3. SITE PHOTOGRAPHS

Photograph 1. Ruderal – fallow vineyard land cover that dominates the majority of the Study Area.

Photograph 2. Developed concrete slab, gravel road, and one of several storage sheds.

Photograph 3. Another view of ruderal -fallow vineyard with small dbh oaks and Prunus spp. scattered throughout.

Photograph 4. Residential building, lawn and landscaped land cover within the western portion of the Study Area. Planted pines in background.

Photograph 5. Ornamental white poplar patch located in the southwestern corner of the Study Area.

Photograph 6. Ruderal – fallow vineyard land cover along the eastern border of the Study Area; no riparian habitat present, despite the county's desktop riparian corridor mapping.

Photograph 7. One of several barn storage fixtures that has potential to support special-status bat species.

Photograph 8. Another barn/storage fixture that could support special-status bat species.

ATTACHMENT 2. SPECIES DATABASE SEARCH RESULTS

ATTACHMENT 3. SITE PHOTOGRAPHS