Appendix C

Biological Assessment for Parking Lot Site

MEMORANDUM

TO:	Kenyon Webster, Aldridge Development	FROM:	Rachel Miller, WRA
CC:		Hope Kingma, WRA	
DATE:	May 8, 2024		
SUBJECT:	Updated Preliminary Biological Assessment for The Batch Plant Parking Lot		

1.0 INTRODUCTION

1.1 Purpose

WRA, Inc. (WRA) has prepared this memorandum to summarize the methods, results, conclusions, and recommendations of a preliminary biological assessment to support the Batch Plant Parking Lot Project (Project), which is proposed at 385 Morris Street (Project Site), in the City of Sebastopol (City), California (**Attachment A, Figures 1 – 3**). Specifically, this memorandum provides updates to the prior memorandum titled "The Batch Plant Parking Lot – Preliminary Biological Assessment", prepared by WRA, dated June 2, 2022. The updates are provided to reflect the current (2024) Project Site conditions. The Project Site is bordered to the north and east by open space and the AmeriCorps Trail associated with Laguna de Santa Rosa, to the south by an existing construction equipment yard and storage building, and to the west by Morris Street and commercial development.

After reviewing the updated site plans and investigating current Project Site conditions, WRA has concluded that any changes from previous site plans do not change WRA's assessment or opinions.

1.2 Project Background

This memorandum focuses on the location of protected resources in relation to the Project Site and the Environmental and Scenic Open Space (ESOS) Combining District setback buffers (Chapter 17.46 of the Municipal Zoning Code). The objectives and criteria of the ESOS are outlined in Chapter 17.46 as follows:

> *"A. To protect the character and quality of the natural environment of critical parcels as identified within the General Plan:*
>
> *1. The elements of scale, form and color derived from the topography and native vegetation of the land shall be preserved.*
>
> *2. Development should be located in such a manner that the overall natural features and processes of the land can still be accommodated.*

B. Setback Buffers. Unless a reduced setback of no less than 50 feet is determined to be appropriate by the Planning Commission upon review of the resource analysis required by subsection D of this section and in conjunction with the findings required by SMC 17.46.060, a 100-foot minimum setback buffer shall be provided from the edge of a wetland, identified riparian dripline, identified endangered species population, or State Department of Fish and Wildlife Preserve, except on the Laguna Youth Park site where no building shall extend beyond 200 feet from the centerline of Morris Street. Up to 20 feet of the required setback may be provided as a landscaped trail area."

Previously-noted homeless encampments to the north and east of the Project Site were not present during the April 2024 Site visit. Additionally, the previously-mapped oxbow wetland east of the Project Site was inundated during the April 2024 Site visit.

The conclusions and recommendations of this report are based on conditions observed at the time of the April 2024 field assessment and regulatory policies and practices in place at the time the report was prepared; changes that may occur in the future regarding conditions, policies, or practices could affect the conclusions presented in this assessment.

2.0 METHODS

Prior to the site visits, background literature was reviewed to evaluate whether special-status species or other sensitive biological resources (e.g., wetlands) could occur in the Project Area and vicinity. Background literature reviewed included aerial photography and the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2024).

Previous Site Visits. On September 1, 2021, WRA biologists Hope Kingma and Matt Richmond traversed the Project Area and vicinity on foot to determine the presence of vegetation communities, special-status plant and wildlife species, essential habitat elements for any special-status plant or wildlife species, and the presence and extent of wetland and non-wetland waters on the Site and the immediate surroundings. WRA biologists also identified wetland and non-wetland waters adjacent to the Project Site potentially subject to regulation by the federal government (U.S. Army Corps of Engineers [USACE]), the state of California (Regional Water Quality Control Board [RWQCB] and the California Department of Fish and Wildlife [CDFW]), and the City of Sebastopol (ESOS Environmental and Scenic Open Space).

On May 25, 2022, WRA biologists Kevin Schwartz and Kelsey Scheckel surveyed on foot the Project Area and the vicinity to the north and east of the project area classifying plant communities according to Sawyer et al. (2009), determining the boundaries of potential wetlands, Waters, and other Waters of the U.S., and recording wildlife species.

April 2024 Site Visit. On April 5, 2024, WRA biologist Rachel Miller traversed the Project Area and vicinity on foot to confirm and update the extent of plant communities, special-status plant and wildlife species, essential habitat elements for any special-status plant or wildlife species, and the presence and extent of wetland and non-wetland waters on the Site and the immediate surroundings. Particular attention was given to the current composition and extent of vegetation communities and the extent of potential wetlands, Waters, and other Waters of the U.S. in the Project Site Vicinity.

3.0 EXISTING CONDITIONS

The Project Site is currently a vacant lot with a remnant concrete pad in the center, old concrete walls around the perimeter, and discarded items throughout the Site, including concrete blocks, fill material, gravel piles, and organic debris piles. The site was formerly a cement plant known as the "Sebastopol Ready Mix Plant Site" that was in operation pre-1985, likely much earlier, but the date is unknown. Historical aerial photographs show the cement plant in operation until at least 2005 (**Appendix B**). Historically, land between Morris Street and the Laguna de Santa Rosa was filled with dredged spoils from Laguna by the City (Cummings 2003) to make it useful for commercial and industrial purposes.

The Laguna de Santa Rosa creek channel is located approximately 200 feet to the east of the project site with associated floodplain vegetation both north and east of the Project Site (**Attachment A – Figure 4**). The eastern floodplain was inundated during the April 2024 survey. Historical imagery shows seasonal inundation of this floodplain, forming an oxbow wetland which becomes disconnected from the Laguna as seasonal inundation recedes, and later dries completely (Google Earth 2024). An AmeriCorps trail meanders through the eastern floodplain and a connector trail connects Morris Street with the AmeriCorps trail north of the Project Site. The majority of the Project Site is at least 10 to 15 feet higher than the adjacent floodplain areas.

4.0 VEGETATION COMMUNITIES

Vegetation communities in the Project Site and immediate proximity include valley oak (*Quercus lobata*) woodlands, mixed woodlands, arroyo willow (*Salix lasiolepis*) thickets, Himalayan blackberry (*Rubus armeniacus*) brambles, ruderal areas, reed canarygrass (*Phalaris arundinacea*) swards, Oregon ash (*Fraxinus latifolia*) groves, and horticultural trees. Vegetation communities are described below and are mapped on **Attachment A – Figure 4**.

Potential wetlands, Waters, and other Waters of the U.S. are mapped in the floodplain between the Project Site and the Laguna – these are vegetated with valley oak woodlands, reed canarygrass swards, and Oregon ash groves communities (**Attachment A – Figure 4**). This area is part of the City of Sebastopol's Laguna Wetlands Preserve. This Preserve provides habitat for a suite of wetland- and riparian-dependent species, as well as critical flood protection and water storage for the lower Russian River region by retaining floodwaters during high winter flows (Prunuske Chatham, Inc. 2015).

Attachment B lists plant and wildlife species observed during the April 5, 2024, site visit, and **Attachment C** provides representative photographs taken during the April 5, 2024, site visit.

4.1 Valley Oak Woodlands

Valley oak woodlands (*Quercus lobata* woodland alliance, S3/G3) occur directly to the north and to the east of the Project Site. Valley oak woodlands are defined by having a dominance of valley oaks in the tree canopy (>50% relative cover or >30% relative cover when other tree species are present). This community occurs within valley bottoms, floodplains, creeks, and stream terraces that have seasonally saturated soils and may be intermittently flooded (Sawyer et. al 2009). Valley oaks have a Wetland Indicator Status (WIS) of FACU, indicating that they usually occur in non-wetlands, but may occur in wetlands (USDA NRCS 2022). Valley oak woodlands are classified as sensitive vegetation communities.

Communities 1-3 are valley oak woodlands. These are detailed below and divided based on relative cover of valley oaks and the presence of other species. Note that potential wetlands, Waters, and other Waters of the U.S. are mapped with a portion of Community 3.

Community 1. This community occurs north of the connector trail and adjacent to Morris Street. Community 1 has a tree canopy of 60% absolute cover of valley oak, with 20% absolute cover of arroyo willow and boxelder (*Acer negundo*). The valley oak leaves were in bud during the April 2024 survey, and the cover of valley oak will increase as leaves mature. The shrub layer is dominated by Himalayan blackberry (70% absolute cover) with some coyote brush (*Baccharis pilularis*, 10% absolute cover).

Community 1 is a transitional area from the seasonally inundated area in the eastern floodplain and Morris Street to the west. Arroyo willow and Himalayan blackberry are classified as FACW, which indicates that they usually occur in wetlands but may occur in non-wetlands. Coyote brush is classified as an upland species (UPL), meaning that it almost never occurs in wetlands. Community 1 was not inundated during the April 2024 survey. The southwestern corner of this community has been re-classified as arroyo willow thickets (see Community 12).

Community 2. Community 2 is also north of the connector trail, east of Community 1 and adjacent to the eastern floodplain. This community is dominated by valley oak (60% absolute cover), with a higher cover of co-dominant species, including arroyo and Gooding's black willow (*Salix gooddingii,* 30% absolute cover) and Oregon ash (20% absolute cover). As in Community 1, the understory is composed of Himalayan blackberry and coyote brush.

Community 3. Community 3 occurs directly east of the Project Site, partially within and adjacent to the eastern floodplain. Community 3 is dominated by approximately 50% cover of valley oak in the tree layer, with some cherry plum (*Prunus cerasifera*, 20% absolute cover). The understory is dominated by Himalayan blackberry (90% cover), with fennel (*Foeniculum vulgare*, 5% cover) and poison oak (*Toxicodendron diversilobum*, 5% cover). Herbaceous species in the low-lying wetlands included narrow-leaved water plantain (*Alisma lanceolatum*, OBL), Santa Barbara sedge (*Carex barbarae*, FAC), curly dock (*Rumex crispus*, FAC), and winged water starwort (*Callitriche marginata*, OBL). Obligate (OBL) species almost always occur in wetlands, while facultative (FAC) species are equally likely to occur in wetlands and non-wetlands.

Potential wetlands, Waters, and other Waters of the U.S. occur within the eastern portion of Community 3; these are marked in **Attachment A – Figure 4**. The mapped extent was confirmed during the April 5, 2024, site visit by the presence and extent of hydrophytic vegetation and the presence of inundation and saturated soils. Hydrophytic vegetation included narrow-leaved water plantain, Santa Barbara sedge, curly dock, winged water starwort, and Himalayan blackberry.

4.2 Mixed Woodlands

Community 4. Mixed woodland (no vegetation alliance) occurs north of the Project Site, along the connector trail and AmeriCorp trail. This area was previously classified as valley oak woodland composed of an early successional stand of mixed hardwoods with >30% relative cover of valley oak. As the other species have matured, the relative cover of valley oak has decreased, and this community no longer qualifies as valley oak woodland (<30% relative cover of valley oak). The community was therefore re-classified as mixed woodlands during the April 2024 site survey.

Community 4 has a tree canopy composed of several co-dominant species, including cherry plum, Boxelder, valley oak, coast live oak (*Quercus agrifolia*), arroyo willow (*Salix lasiolepis*), and

Gooding's black willow. The understory of Community 4 is dominated by Himalayan blackberry (70% absolute cover), with some common rush (*Juncus patens*, 10% absolute cover) also present.

4.3 Arroyo Willow Thickets

Arroyo willow thickets (*Salix lasiolepis* Shrubland Alliance, S4/G4) occur within the Project Site (Community 5) and north of the Project Site adjacent to Morris Street (Community 12). Arroyo willow thickets are defined by the dominance (>50% relative cover) or co-dominance (>30% relative cover) of arroyo willow in the tall shrub or low tree canopy. Arroyo willows are classified as FACW; however, the dominance of this species does not automatically indicate the presence of a wetland, as this species occurs in non-wetlands approximately 33% of the time. This community is not classified as sensitive; however, a Corps-verified jurisdictional delineation (JD) would be required before conclusively classifying the arroyo willow thickets as uplands.

Community 5. An arroyo willow thicket occurs in the eastern portion of the Project Site, where a dense canopy of arroyo willow (80% absolute cover) has grown over large concrete blocks, discarded bricks, and rip rap. The understory is comprised of fennel and Himalayan blackberry. The concrete, bricks, and rip rap are remnants of the previous cement plant on site and/or may have been excavated from the depression immediately east of this community.

During the September 2021 site visit, Community 5 was previously characterized as a depressional wetland; however, the area was impenetrable to survey for hydric soils or hydrology indicators. During the May 2022 and April 2024 site surveys, Community 5 was not inundated or saturated and there were no other hydrology indicators present. Community 5 was therefore confirmed as a likely upland vegetation community during April 2024. However, this community cannot be conclusively classified as upland without a Corps-verified JD.

Community 12. During the April 2024 survey, the southeastern corner of Community 1 was re-classified as an arroyo willow thicket. Community 12 is dominated by arroyo willow at approximately 80% absolute cover in the tree canopy. The arroyo willows appear to have matured and grown since the May 2022 site visit. Himalayan blackberry dominates the understory of Community 12.

4.4 Himalayan Blackberry Brambles

Community 6. Himalayan blackberry brambles (*Rubus armeniacus* Shrubland Semi-natural Alliance, SNA/GNA) occur within the Project Site, adjacent to the arroyo willow thickets. Himalayan blackberry thickets are defined by the dominance of Himalayan blackberries (>60% relative cover) in the shrub layer (Sawyer et. al. 2009). The extent of Himalayan blackberry thickets was expanded during the April 2024 survey.

Himalayan blackberries dominate community 6, at 100% absolute cover in the shrub layer. Some arroyo willows and fennel are scattered through this community at less than 10% absolute cover. Himalayan blackberries are classified as a highly invasive species by the California Invasive Plant Council (Cal-IPC 2024), and this alliance is not classified as sensitive. However, Himalayan blackberries are classified as a facultative wetland species (FAC), so a Corps-verified JD would be required to conclusively classify this community as non-wetlands.

4.5 Ruderal Areas

Community 7. Within the Project Site, ruderal areas (no vegetation alliance) occur within and along the perimeter of the Site. The ruderal areas are dominated by invasive and non-native species and the community is not classified as sensitive. Dominant species include slim oat (*Avena barbata*), ripgut brome (*Bromus diandrus*), soft chess (*Bromus hordeaceus*), and Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*). Other common species included Bermuda grass (*Cynodon dactylon*), Italian ryegrass (*Festuca perennis*), sweet fennel (*Foeniculum vulgare*), black mustard (Brassica nigra), rose clover (*Trifolium hirtum*), California burclover (*Medicago polymorpha*), and spring vetch (*Vicia sativa*).

Community 11. During the May 2022 site visit, a pile of vegetation debris was noted within this community. As of April 2024, the vegetation debris pile had significantly expanded and was mapped separately as land cover type 11 (**Attachment A – Figure 4**).

4.6 Reed Canarygrass

Community 8. Reed canarygrass swards (*Phalaris arundinacea* Herbaceous Semi-Natural Alliance, SNA/GNA) occur to the east and north of the oxbow wetland and along the AmeriCorps trail. Within the Project Site vicinity, this vegetation alliance is dominated by a monoculture of reed canarygrass, with a few scattered arroyo willows and Oregon ash trees along the perimeter. During the April 2024 survey, reed canarygrass occurred as emergent vegetation within the inundated portion of the eastern floodplain.

This alliance is not classified as sensitive; however, within the Project Site vicinity, it occurs within the potential wetlands, Waters, and other Waters of the U.S. (**Attachment A – Figure 4**). The mapped extent of potential wetlands was confirmed during the April 2024 site visit by the presence and extent of hydrophytic vegetation (i.e., reed canarygrass, which is a FACW species) and the presence of inundation.

4.7 Oregon Ash Groves

Community 9. Oregon ash groves (*Fraxinus latifolia* Forest and Woodland Alliance, S3.2/G4) occur in the northern and eastern portions of the Project Site. This alliance is defined by a tree canopy with >50% absolute cover or >30% relative cover of Oregon ash (Sawyer et. al. 2009). This alliance is classified as sensitive, and the Oregon ash groves in the Project Site vicinity also occur within potential wetlands, Waters, and other Waters of the U.S. Community 9 is composed of Oregon ash groves.

In the Project Site vicinity, Oregon ash groves are dominated by Oregon ash (60% absolute cover), with valley oaks also common (20% absolute cover). The understory is composed of young Oregon ash seedlings and Himalayan blackberry, with the herbaceous layer composed of reed canarygrass, water plantain, and curly dock. The mapped extent of potential wetlands was confirmed during the April 2024 site visit by the presence and extent of hydrophytic vegetation and the presence of inundation. Hydrophytic vegetation within Community 9 includes Oregon ash (FACW), Himalayan blackberry, reed canarygrass, water plantain (OBL), and curly doc (FAC).

4.8 Horticultural Trees

Community 10. Horticultural trees (no vegetation alliance) occur outside the northwestern corner of the Project Site, along the entrance to the AmeriCorps trail. Cherry plum, coast live oak, and holly leaf cherry (*Prunus ilicifolia*) are co-dominant in the tree canopy, with coyote brush and Himalayan blackberry in the shrub layer. This community is not classified as sensitive.

5.0 RECOMMENDATIONS

5.1 Analysis of Effects to Special-Status Species

Due to the extremely disturbed and historic land use of the project site, no special-status plant or wildlife species have potential to occur within the proposed parking lot development envelope. Based on the CNDDB records, no special-status plants or wildlife species are known to occur on or adjacent to the project site.

5.2 Laguna Wetlands Preserve Restoration and Management Plan

The purpose of the Laguna Wetlands Preserve Restoration and Management Plan is to guide the City's long-term management of the properties consistent with the Laguna Master Plan (Prunuske Chatham, Inc. 2015). The Plan includes an inventory of the natural, cultural, and recreational resources of the Preserve; describes restoration and management objectives and actions as well as environmental compliance requirements. The goals and policies most relevant to this document, include:

A. *Preservation of Laguna habitats, including sensitive habitats and lands that serve as buffers between the Laguna and urban or agricultural development.*
B. *Establish a Specific Park Development Plan Compatible with Protection and Enhancement Goals.*
    - *Native tree buffer between park uses and adjacent land uses, from 8-40' wide, designed to provide wildlife resources as well as screening. This buffer now exists in most places where it is feasible.*

5.3 City of Sebastopol ESOS Environmental and Scenic Open Space Requirements

The purpose of the ESOS Environmental and Scenic Open Space Combining District is to control land use within areas of great scenic or environmental value to the citizens of the Sebastopol General Plan area, to control any alteration of the natural environment and terrain in areas of special ecological and educational significance to the entire community as unique vegetative units or wildlife habitats or as unique geological or botanic specimens, and to enhance and maintain for the public welfare and well-being the public amenities accrued from the preservation of the scenic beauty and environmental quality of Sebastopol. The ESOS Combining District was established to implement the goals, policies and objectives of the Conservation, Open Space and Parks Element of the General Plan.

The ESOS Combining District includes setback requirements to protect the quality and integrity of certain unique scenic, ecologic or biotic environments (Zoning Code Chapter 17.92, ESOS – Environmental and Scenic Open Space District). The Project Site is zoned M Industrial and ESOS, Environmental and Scenic Open Space. The ESOS zone requires a 100-foot minimum setback

buffer from the edge of a wetland or identified riparian dripline, unless a reduced setback of no less than 50 feet is determined to be appropriate by the Planning Commission, based on review of a resource analysis. Up to 20 feet of the required setback may be provided as a landscaped trail area.

The requirements of the resource analysis are detailed subsection D; however, Section 17.46.090 states that the Planning Commission can modify the study requirements based on substantial evidence provided by a qualified professional that specific resources of potential concern do not occur on the property or will not be affected by the project.

5.4 Previous Conceptual Development Plan Modifications and Recommendations

Based on the September 2021 and May 2022 site visits, WRA previously recommended that the Conceptual Development Plan, dated 7/14/21, be revised in order to avoid impacts to potential wetlands on the site. WRA recommended that the proposed development be confined to the limits of existing disturbance (Limit of Disturbance), as illustrated in **Figure 3**. Finally, the Conceptual Development Plan dated 7/14/21 showed the Laguna Promenade trail extending off the project site to connect with the existing dirt trail to the north; however, there is a very steep slope that would make a trail extension infeasible at that location and would likely result in impacts to mature willows. The current plans (dated 5/6/2024, **Attachment D**) incorporate these recommendations (see Section 6.2).

6.0 OTHER CONSIDERATIONS

6.1 Analysis of Potential Effects to Water Quality

The current proposed plans (dated 5/6/2024, **Attachment D**) illustrates that there are several stormwater treatment facilities, such as a bioretention basin and bio-treatment swales with native plantings, proposed along the southern and eastern borders of the parking lot to retain and treat stormwater run-off. It is assumed that the treated stormwater will be discharged to the existing storm drain system in Morris Street.

To further ensure that there are no water quality impacts to adjacent floodplain that is located north and east of the project site, the grading of the parking lot will be sloped away from the wetland and floodplain as indicated in the Conceptual Grading Plan L2.0. Installation of a concrete barrier around the site perimeter is also shown on the current plants; this concrete barrier would provide an additional measure of protection for the adjacent biological resources by preventing any run-off from the parking lot from flowing into the adjacent wetland. This would be a significant improvement over the current site conditions since there is no barrier between the limits of disturbance and the adjacent wetlands at this time.

6.2 Revised Plans for the Batch Plant Parking Lot

The current plans for the Batch Plant Valet Parking Lot prepared by ZAC Landscape Architects Inc., (dated 5/6/2024, **Attachment D**) show that the proposed Laguna Promenade trail and overlook on the eastern edge of the project site are located within the limits of existing disturbance (see Sheet L1.1). A previously-planned trail connection to the north has been removed from the current plans.

The Conceptual Grading Plan (Sheet L2.0) shows that the site will be sloped away from the wetland and floodplain towards Morris Street. The Conceptual Landscape Plan (Sheet L3.0) illustrates the proposed native plantings and retained existing vegetation.

7.0 CONCLUSIONS

This report provides a resource analysis of the existing vegetative and biotic characteristics of the property and the changes that may occur as a result of a development project. After reviewing the updated Barlow Batch Plant Valet Parking Lot Plans, any changes from previous site plans do not change WRA's assessment or opinions.

The previous plans for the Batch Plant Parking Lot dated 11/16/21 and 04/28/2022 were modified as recommended above, and the stormwater treatment facilities do not discharge directly into the Laguna floodplain.

Stormwater runoff. The current proposed development (dated 5/6/2024, **Attachment D**) would be an improvement in stormwater runoff as the current conditions allow runoff into the Laguna de Santa Rosa. Previous plan versions (dated 11/16/2021 and 4/28/2022) were modified as recommended above, and the current proposed plans (dated 5/6/2024, **Attachment D**) would ensure that runoff is funneled into the City's stormwater facilities stormwater treatment and does not discharge directly into the Laguna floodplain. As such, the proposed parking lot will not impact the biological resources associated with the Laguna Wetlands Preserve.

The current proposed plans also significantly increase the natural treatment of stormwater runoff by adding bio-retention and treatment on site. The current plan shows a greater than 30% increase in native vegetative and tree cover on site which would help the City meet some of its Climate Protection Campaign and Sonoma County Climate Action Plan goals.

Grading Limits of Disturbance. WRA recommends confining the Project to within the limits of previous disturbance (**Attachment A – Figure 3**). Grading within the Limits of Disturbance should not impact mature oaks growing outside of the Limits of Disturbance. These trees established themselves 10 to 15 feet below the current grade and while this area had been an active cement plant. The soil within the Limits of Disturbance has already been highly compacted for over 50 years. The proposed plans will de-compact a large portion of the area to allow for the creation of bio-retention facilities and tree plantings. These are improvements over the existing conditions. Best management practices and tree protection measures will be installed to prevent any impact to existing native vegetation communities.

Nesting Birds. If project construction is initiated during the breeding season (February 15 – September 1), a preconstruction nesting bird survey will be required to ensure that project activities do not disturb raptors or other native birds that likely nest in the adjacent floodplain that is located north and east of the project site. If active nests are identified, suitable non-disturbance buffers will be required, as determined by a qualified biologist.

During the May 2022 site visit and breeding season, WRA biologists saw City maintenance staff mowing the AmeriCorps trail which traverses directly through wetlands, saturated soils, and nesting bird habitat. City staff informed the WRA biologists that they mow the area, trim branches, and clear fallen debris 3 times per season. The maintenance crew nearly got their pickup stuck in the wetlands as the soils in these areas are saturated. Driving in these areas on saturated soils compacts the soil, creates ruts, and increases the likelihood that invasive species of plants will take hold. These types of disturbances have a much greater impact on the wetlands and wildlife than the proposed project work in an area previously used as a cement

plant. Increased visitation in the project area potentially could also decrease the incidence of dumping, homelessness, and point sources of pollution into the Laguna de Santa Rosa that currently plague the area along the AmeriCorps trail. The City regularly removes large areas of garbage from the areas north and east of the Project Site within the Laguna Wetlands Reserve.

Summary. It is WRA's professional opinion that due to the existing character of the property and the proposed scope of the proposed project, the full scope of studies called for by SMC 17.46.050(D) is not necessary, given the fact that the parking lot footprint was previously intensely developed and disturbed, and the proposed project would not expand beyond the limits of prior disturbance on the site. The wetland boundary east of the Project Site is located outside of the 50-foot development setback, per the current plans (dated 5/6/2024, **Attachment D**), and this reduced setback is appropriate for this site. The current proposed plan (dated 5/6/2024, **Attachment D**) would slope the site away from this edge, improving the water quality of the Laguna de Santa Rosa as compared to the existing conditions which provide no barrier. In addition, the proposed landscaping would provide an improved buffer over the current conditions. The existing mature valley oaks on the eastern edge of the project site provide an adequate native tree buffer between the edge of the project site (limits of the proposed parking lot) and the wetland floodplain associated with the Laguna de Santa Rosa.

8.0 ATTACHMENTS:

Attachment A. Figures
- Figure 1. Location
- Figure 2. Aerial Vicinity
- Figure 3. Aerial Map
- Figure 4. Existing Conditions Survey (April 5, 2024)
- Figure 5. Photo Locations

Attachment B. Project Site Photographs April 5, 2024

Attachment C. List of Observed Plant and Animal Species in Project Site and Vicinity on April 5, 2024

Attachment D. Barlow Batch Plant Parking Lot Plans (dated 5/6/2024)

9.0 REFERENCES:

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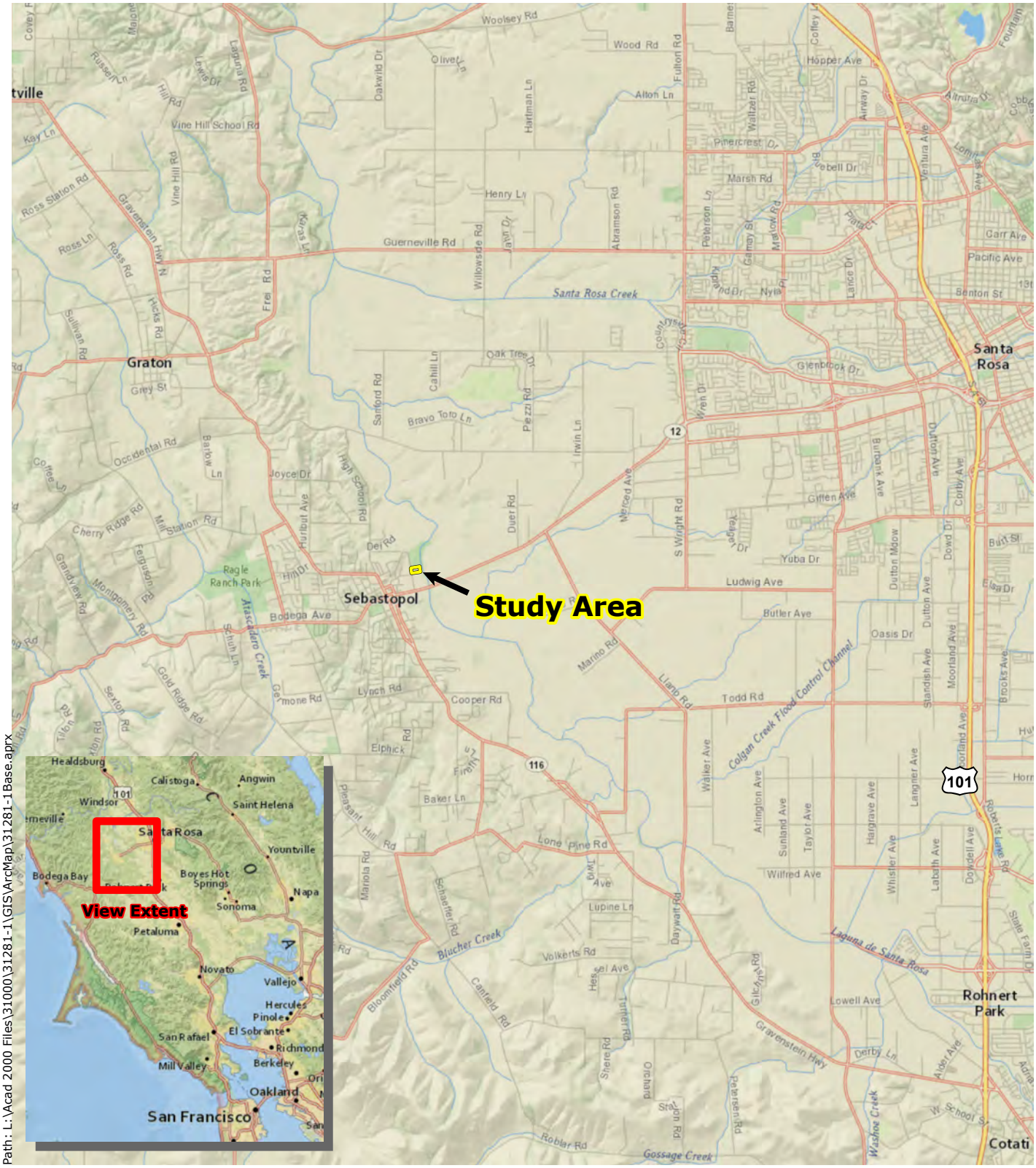

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Sources: National Geographic, WRA | Prepared By: rochelle, 5/3/2024

Figure 1. Study Area Regional Location Map

The Barlow Parking at Batch Plant
Sebastopol, California

0 1 2 Miles

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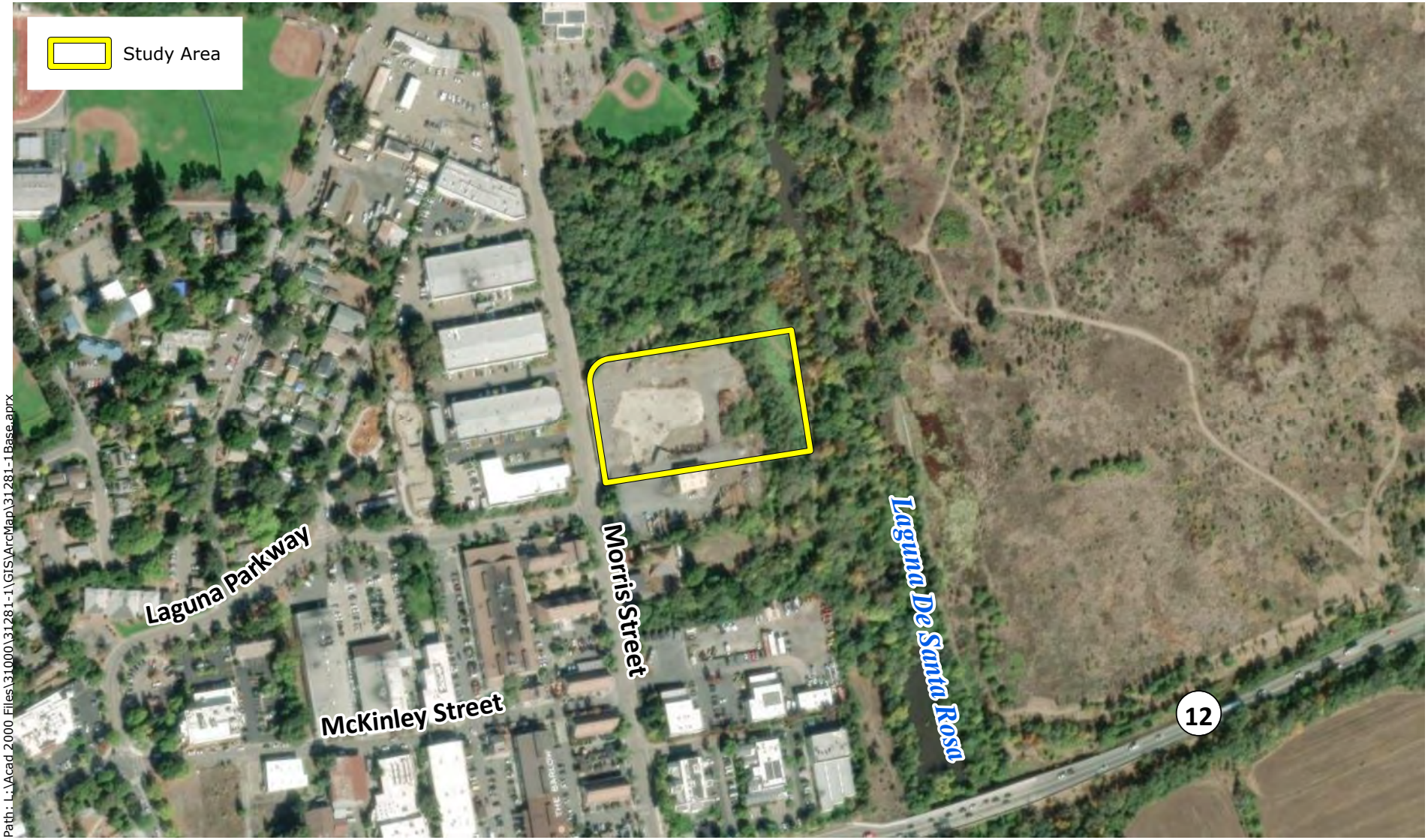
wra Environmental Consultants



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Sources: 2018 Sonoma County Aerial, WRA | Prepared By: rochelle, 5/3/2024

Figure 2. Aerial Vicinity Map

The Barlow Parking at Batch Plant
Sebastopol, California

0 250 500 Feet

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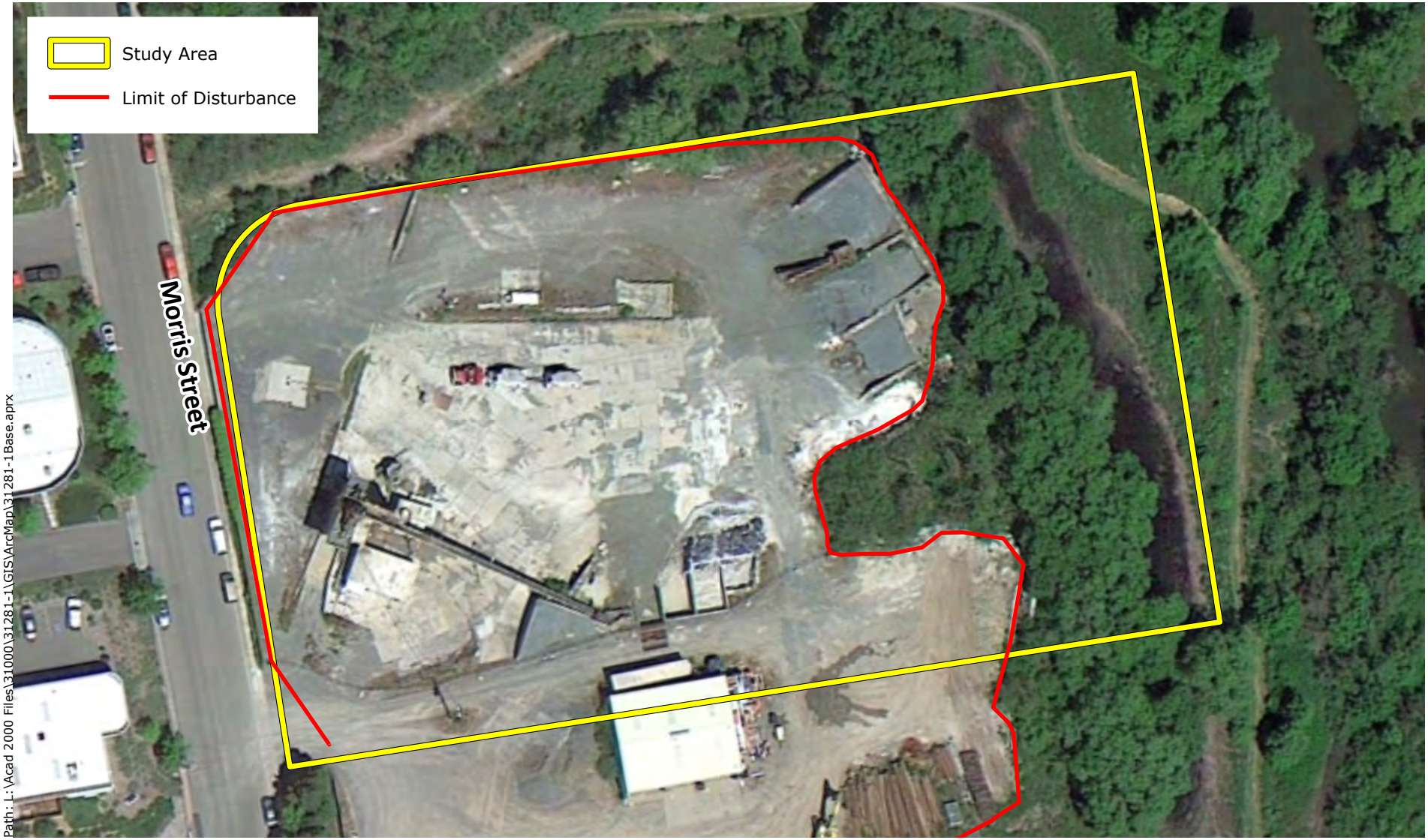
wra Environmental Consultants



Sources: ZAC Prvided Aerial, WRA | Prepared By: rochelle, 5/3/2024

Figure 3. Study Area Aerial Map

The Barlow Parking at Batch Plant
Sebastopol, California

0 50 100 Feet

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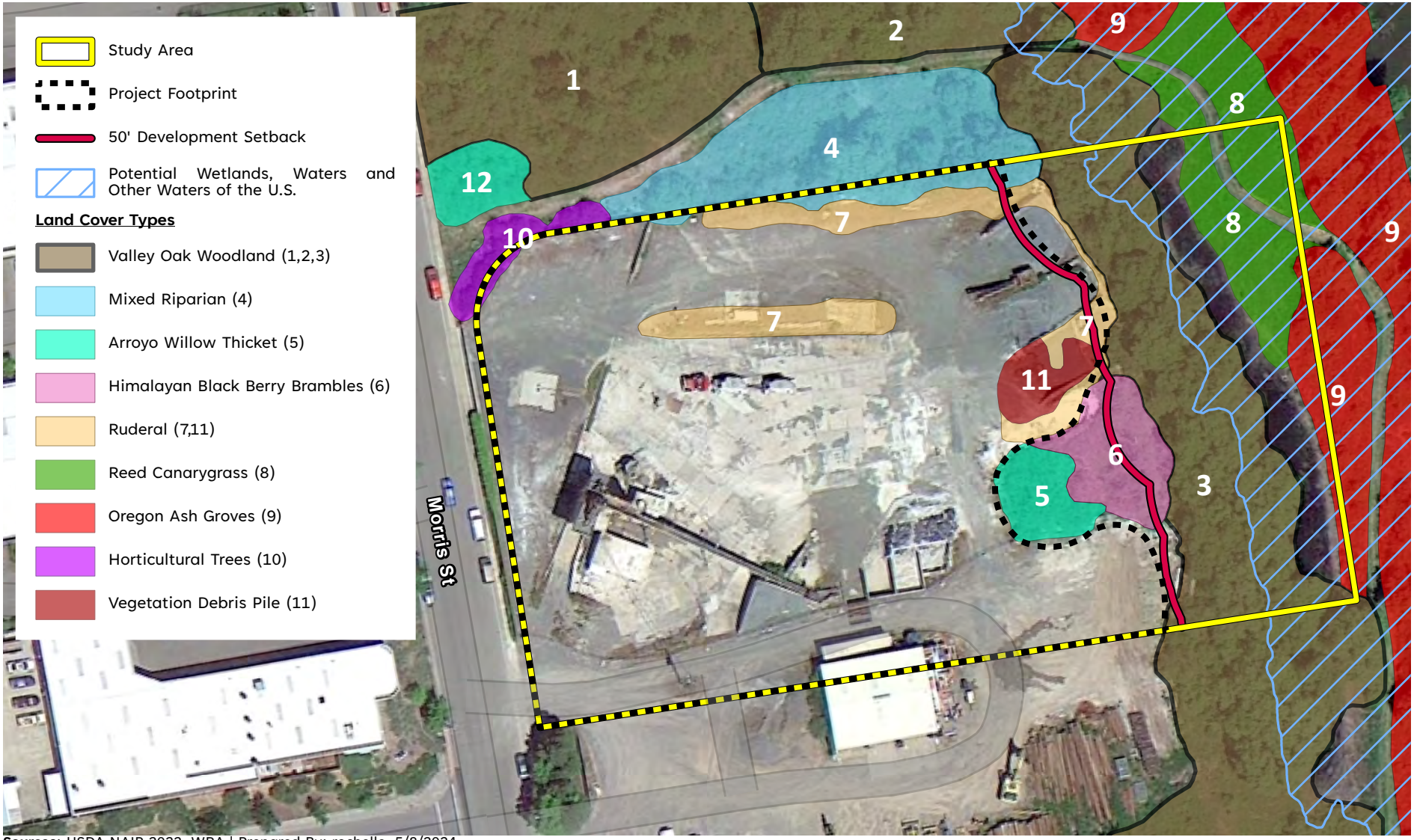
wra Environmental Consultants



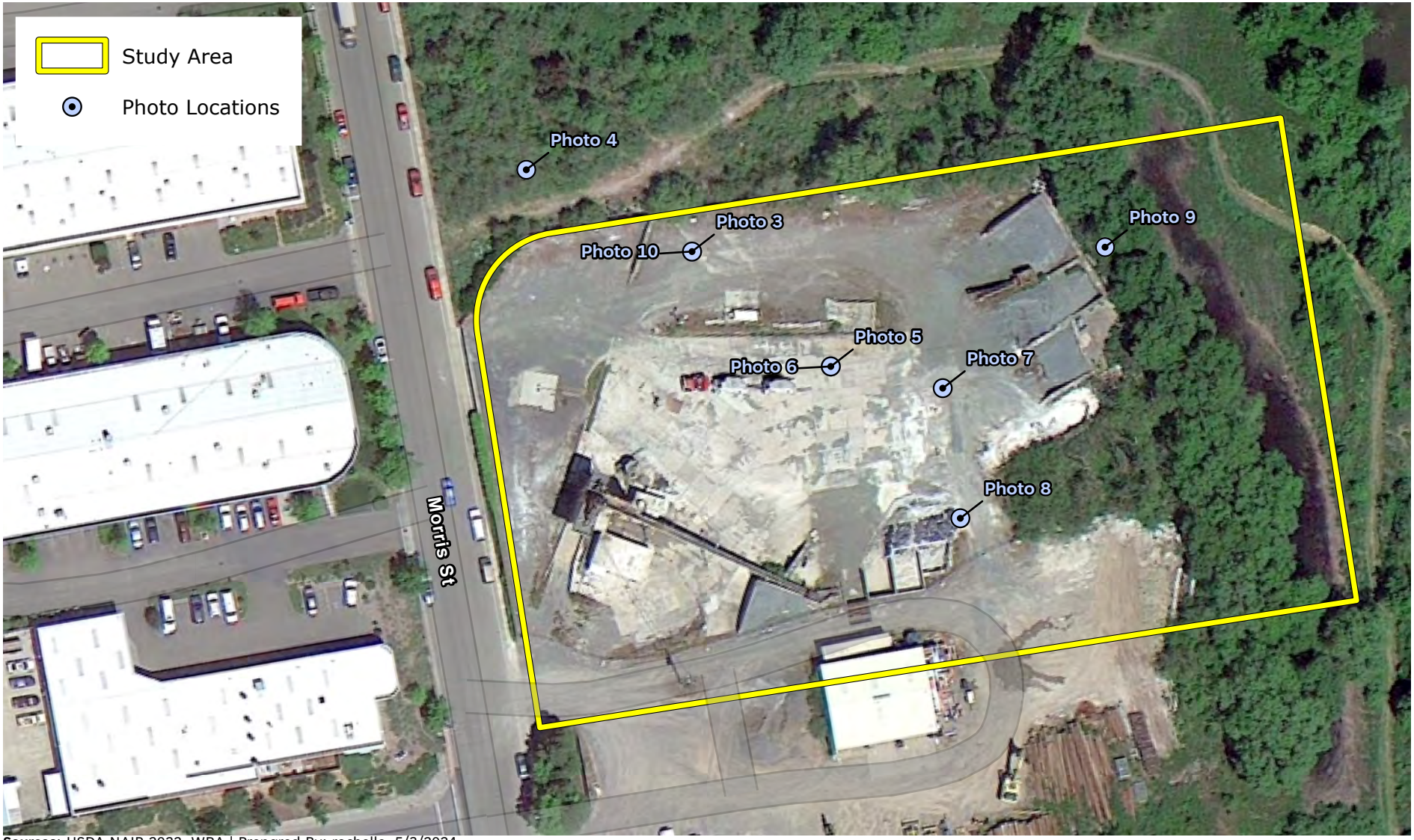
Path: L:\Acad 2000 Files\31000\31281-1\GIS\ArcMap\31281-1Base.aprx Layout Name: Land Cover Types

Sources: USDA NAIP 2022, WRA | Prepared By: rochelle, 5/8/2024

Figure 4. Existing Conditions Survey (April 5, 2024)

The Barlow Parking at Batch Plant
Sebastopol, California

wra Environmental Consultants



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Sources: USDA NAIP 2022, WRA | Prepared By: rochelle, 5/3/2024

Figure 5. Photo Locations

The Barlow Parking at Batch Plant
Sebastopol, California

wra Environmental Consultants

Photo 1. Historical aerial imagery of the Project Site, showing history of disturbance on the site, with active concrete plant. The oxbow wetland to the east of the Project Site is seasonally dry. Aerial imagery date: October 19, 2003.

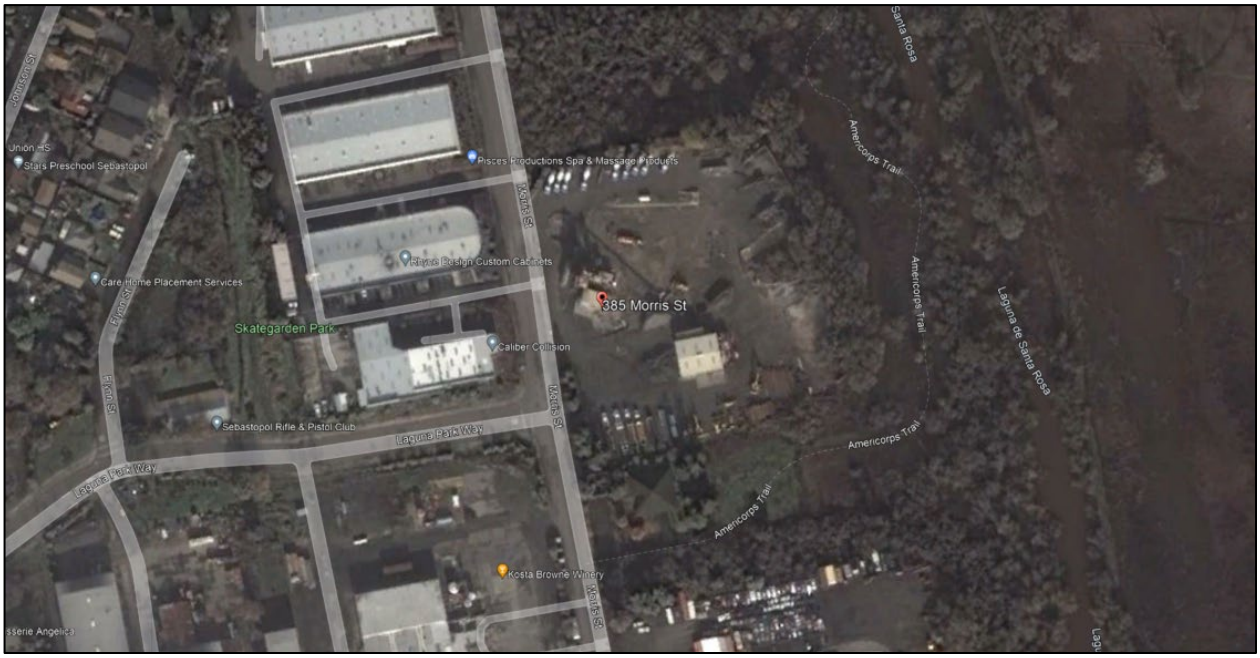


Photo 2. Historical aerial imagery of the Project Site, showing high inundation throughout the Laguna de Santa Rosa and floodplain east of the site. Aerial imagery date: December 23, 2005.

Photo 3. Overview of the Project Site, showing concrete pad, gravel/paved areas, discarded concrete blocks, and ruderal vegetation (Community 7). Facing south; photo taken April 5, 2024.

Photo 4. Representative view of connector trail north of the Project Site. Arroyo willow thicket (Community 12) on left, and horticultural trees (Community 10) on right. Facing northeast; photo taken April 5, 2024.

Photo 5. Representative view of mixed riparian (Community 4). Facing southeast; photo taken April 5, 2024.

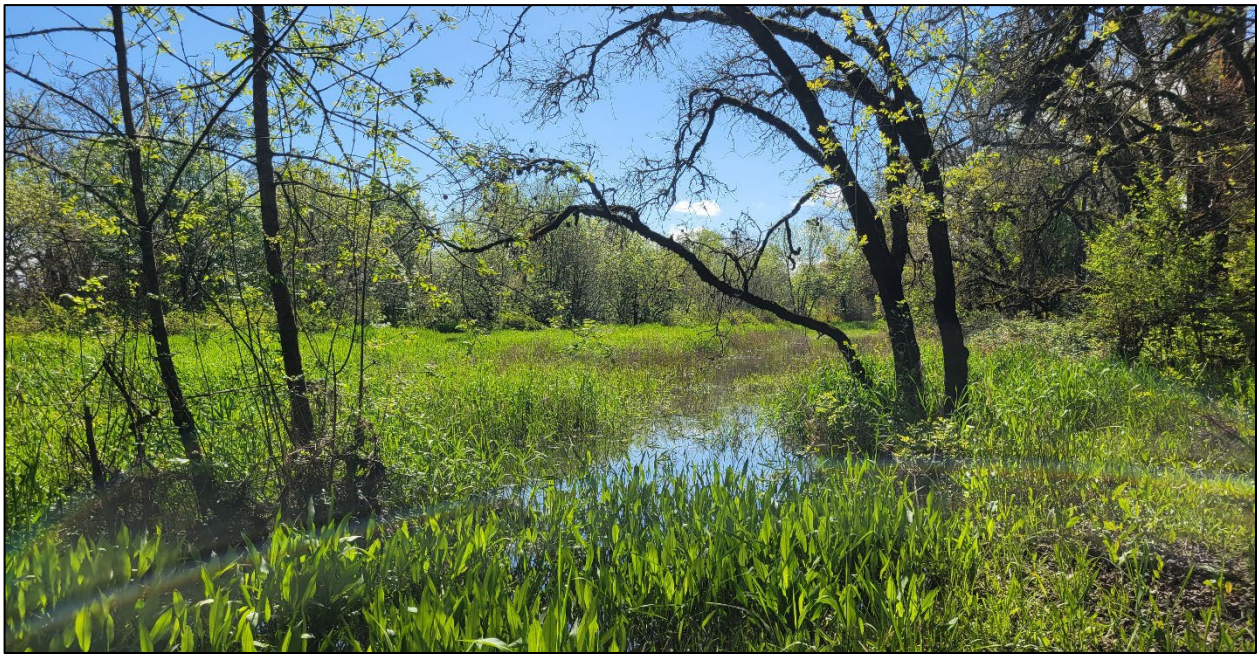


Photo 6. Representative view of reed canarygrass swards (Community 8), with valley oak woodland (Community 3) on right. The AmeriCorps trail is inundated in photo center. Facing southeast; photo taken April 5, 2024.

Photo 7. Vegetation debris pile in Project Site (Land Cover 11; not a vegetation community). Facing northeast; photo taken April 5, 2024.

Photo 8. Arroyo willow thicket (Community 5), with fennel in understory. Facing west; photo taken April 2024.

Photo 9. View from eastern border of the Project Site, showing inundated oxbow wetland, Reed canarygrass swards (Community 8), and Oregon ash groves (Community 9) beyond. Facing east; photo taken April 5, 2024.

Photo 10. Representative view of Project Site, showing concrete pad and ruderal vegetation (Community 7). Facing southeast; photo taken April 5, 2024.

Attachment C. List of Observed Plant and Animal Species in Project Site and Vicinity on April 5, 2024

TSCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
Acer negundo	Boxelder	native	tree	-	-	FACW
Alisma lanceolatum	Water plantain	non-native	perennial herb (aquatic)	-	-	OBL
Avena barbata	Slim oat	non-native (invasive)	annual, perennial grass	-	Moderate	-
Baccharis pilularis	Coyote brush	native	shrub	-	-	-
Brassica nigra	Black mustard	non-native (invasive)	annual herb	-	Moderate	-
Bromus diandrus	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
Bromus hordeaceus	Soft chess	non-native (invasive)	annual grass	-	Limited	FACU
Bromus sitchensis var. *carinatus*	California brome	native	perennial grass	-	-	-
Callitriche marginata	Winged water starwort	native	annual herb (aquatic)	-	-	OBL
Carduus pycnocephalus ssp. *pycnocephalus*	Italian thistle	non-native (invasive)	annual herb	-	Moderate	-
Carex barbarae	Valley sedge	native	perennial grasslike herb	-	-	FAC
Erodium cicutarium	Red stemmed filaree	non-native (invasive)	annual herb	-	Limited	-
Erodium moschatum	Whitestem filaree	non-native	annual herb	-	-	-
Festuca myuros	Rattail sixweeks grass	non-native (invasive)	annual grass	-	Moderate	FACU
Festuca perennis	Italian rye grass	non-native (invasive)	annual, perennial grass	-	Moderate	FAC
Foeniculum vulgare	Fennel	non-native (invasive)	perennial herb	-	High	-
Fraxinus latifolia	Oregon ash	native	tree	-	-	FACW
Geranium dissectum	Wild geranium	non-native (invasive)	annual herb	-	Limited	-
Hordeum murinum	Foxtail barley	non-native (invasive)	annual grass	-	Moderate	FACU
Hypochaeris radicata	Hairy cats ear	non-native (invasive)	perennial herb	-	Moderate	FACU
Juncus patens	Common rush	native	perennial grasslike herb	-	-	FACW
Lactuca serriola	Prickly lettuce	non-native	annual herb	-	-	FACU

Attachment C. List of Observed Plant and Animal Species in Project Site and Vicinity on April 5, 2024

TSCIENTIFIC NAME	COMMON NAME	ORIGIN	FORM	RARITY STATUS[1]	CAL-IPC STATUS[2]	WETLAND STATUS[3]
Medicago polymorpha	Bur clover	non-native (invasive)	annual herb	-	Limited	FACU
Nicotiana sp. (NIF)	-	-	-	-	-	-
Phalaris arundinacea	Reed canarygrass	native	perennial grass	-	-	FACW
Plantago elongata	Coastal plantain	native	annual herb	-	-	FACW
Plantago lanceolata	Ribwort	non-native (invasive)	perennial herb	-	Limited	FAC
Poa annua	Annual blue grass	non-native	annual grass	-	-	FAC
Prunus cerasifera	Cherry plum	non-native (invasive)	tree	-	Limited	-
Prunus ilicifolia	Holly leaf cherry	native	tree, shrub	-	-	-
Pyrus communis	Common pear	non-native	tree	-	-	-
Quercus agrifolia	Coast live oak	native	tree	-	-	-
Quercus lobata	Valley oak	native	tree	-	-	FACU
Raphanus sativus	Wild radish	non-native (invasive)	annual, biennial herb	-	Limited	-
Rorippa curvipes	Bluntleaf yellow cress	native	annual herb	-	-	FACW
Rosa sp.	-	-	-	-	-	-
Rubus armeniacus	Himalayan blackberry	non-native (invasive)	shrub	-	High	FAC
Rumex crispus	Curly dock	non-native (invasive)	perennial herb	-	Limited	FAC
Salix babylonica	Weeping willow	non-native	tree	-	-	FAC
Salix gooddingii	Goodding's black willow	native	tree	-	-	FACW
Salix lasiolepis	Arroyo willow	native	tree, shrub	-	-	FACW
Silybum marianum	Milk thistle	non-native (invasive)	annual, perennial herb	-	Limited	-
Sonchus asper ssp. *asper*	Prickly sow thistle	non-native	annual herb	-	-	FAC
Toxicodendron diversilobum	Poison oak	native	vine, shrub	-	-	FACU

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2024]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2024] or Inventory of Rare and Endangered Plants (CNPS 2024). Sp.: "species," intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

[1] **California Native Plant Society. 2024. Inventory of Rare and Endangered Plants (online edition, v9-01 1.5). Sacramento, California. Online at: http://rareplants.cnps.org/; most recently accessed: April 2024.**

FE: Federal Endangered
FT: Federal Threatened
SE: State Endangered
ST: State Threatened
SR: State Rare

Rank 1A:	Plants presumed extinct in California
Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere
Rank 2:	Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3:	Plants about which we need more information – a review list
Rank 4:	Plants of limited distribution – a watch list

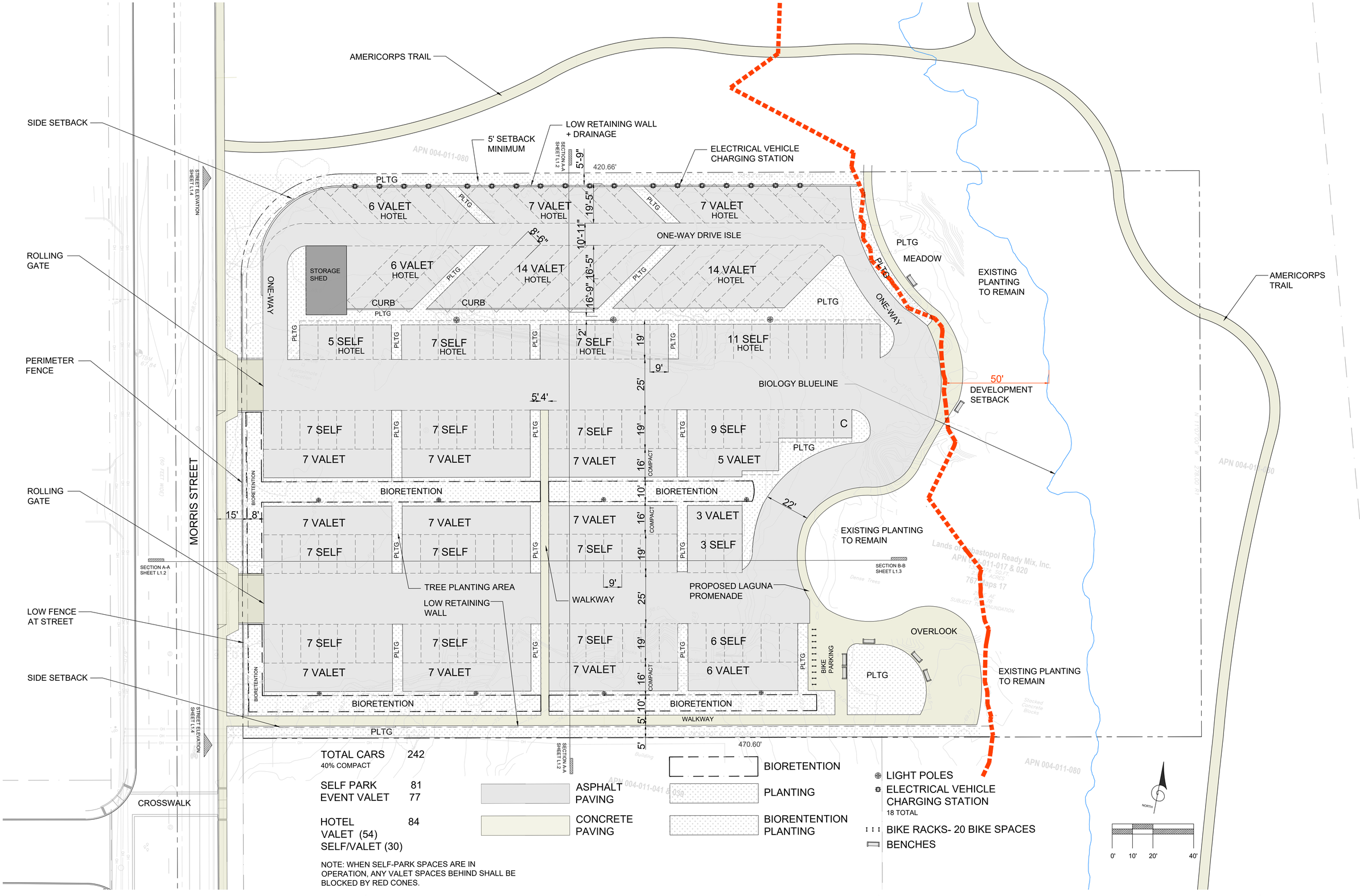
[2] **California Invasive Plant Council. 2024. California Invasive Plant Inventory Database. California Invasive Plant Council, Berkeley, CA. Online at: http://www.cal-ipc.org/paf/; most recently accessed: April 2024.**

High:	Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate:	Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited:	Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed:	Assessed by Cal-IPC and determined to not be an existing current threat

[3] **U.S. Army Corps of Engineers. 2022. National Wetland Plant List, version 3.6. Online at: http://wetland-plants.sec.usace.army.mil/**

OBL:	Almost always found in wetlands
FACW:	Usually found in wetlands
FAC:	Equally found in wetlands and uplands
FACU:	Usually not found in wetlands
UPL:	Almost never found in wetlands
NL:	Not listed, assumed almost never found in wetlands
NI:	No information; not factored during wetland delineation

WILDLIFE		
SCIENTIFIC NAME	**COMMON NAME**	**STATUS**
BIRDS		
Aphelocoma californica	California scrub-jay	No status
Sayornis nigricans	black phoebe	No status
Thryomanes bewickii	Bewick's wren	No status
Melospiza melodia	Song sparrow	No status
Pipilo maculatus	Spotted Towhee	No status
Anas platyrhynchos	Mallard	No status
Corvus brachyrhynchos	American crow	No status



TOTAL CARS	242
40% COMPACT	
SELF PARK	81
EVENT VALET	77
HOTEL VALET (54) SELF/VALET (30)	84

NOTE: WHEN SELF-PARK SPACES ARE IN OPERATION, ANY VALET SPACES BEHIND SHALL BE BLOCKED BY RED CONES.

- ASPHALT PAVING
- CONCRETE PAVING
- BIORENTENTION
- PLANTING
- BIORENTENTION PLANTING
- LIGHT POLES
- ELECTRICAL VEHICLE CHARGING STATION 18 TOTAL
- BIKE RACKS- 20 BIKE SPACES
- BENCHES

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SEBASTOPOL, CA 95472
(707) 824-5600

BATCH PLANT PARKING LOT

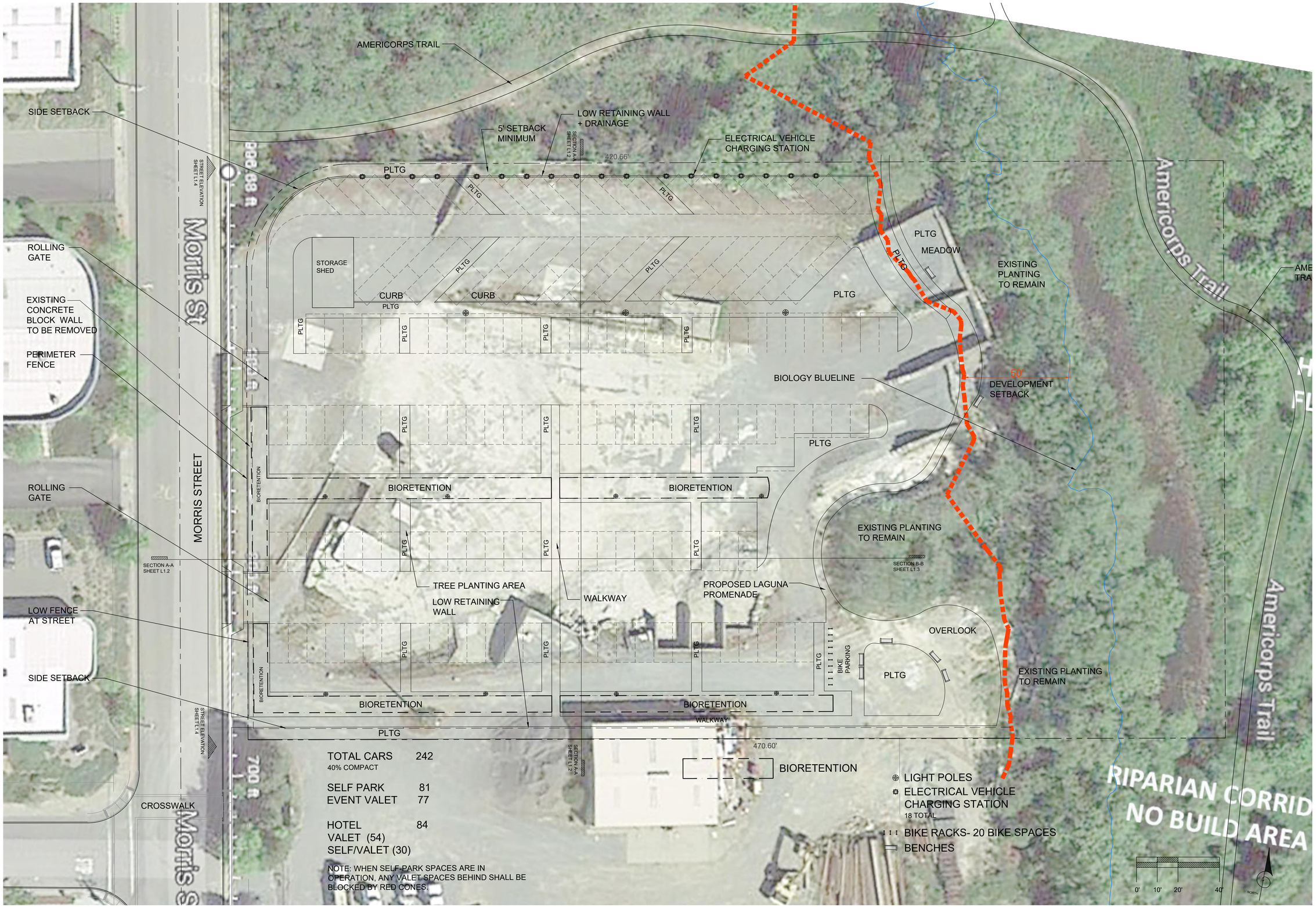
385 MORRIS STREET SEBASTOPOL CA 95472

APN 004-011-017 & 020

CONCEPTUAL SITE PLAN

PLOT DATE:
05-06-2024

L1.0



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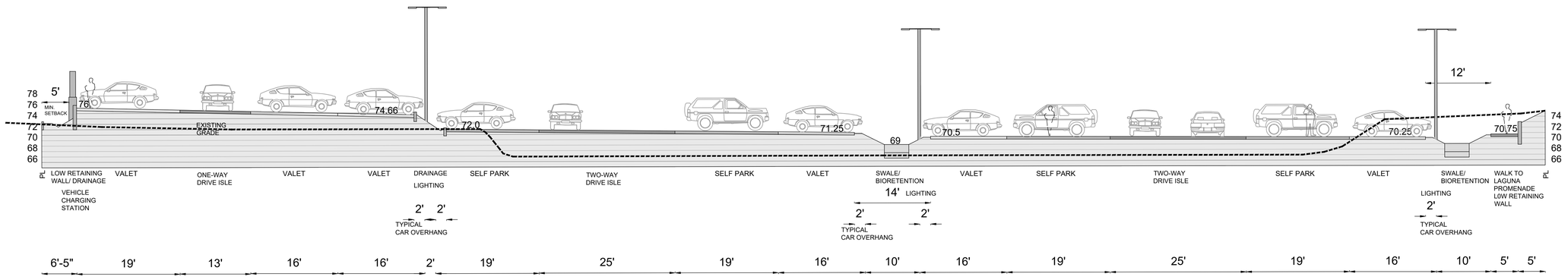
APN 004-011-017 & 020

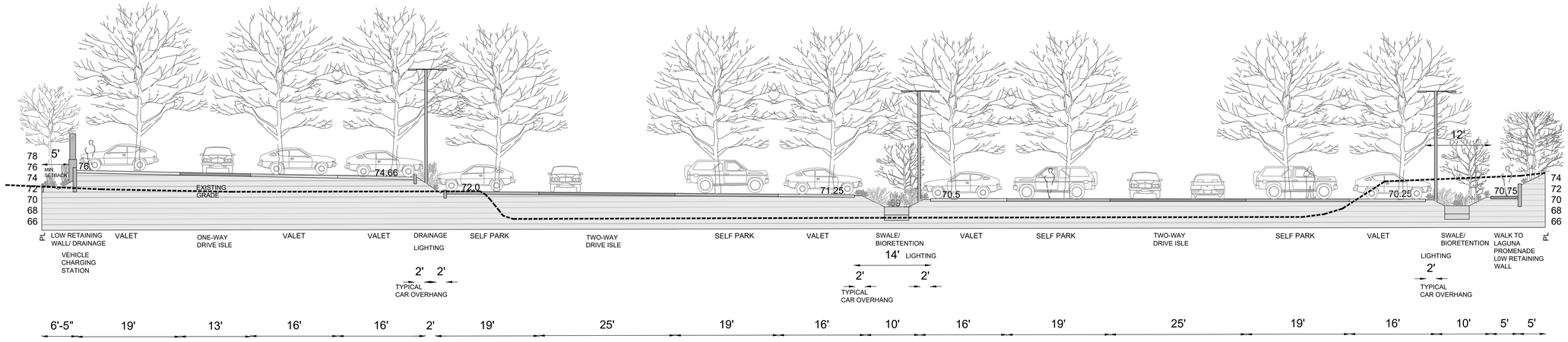
CONCEPTUAL SITE PLAN + AERIAL PHOTO

PLOT DATE:
05-06-2024

L1.1



SITE SECTION A-A



SITE SECTION A-A with PLANTING

0' 5' 10' 20'

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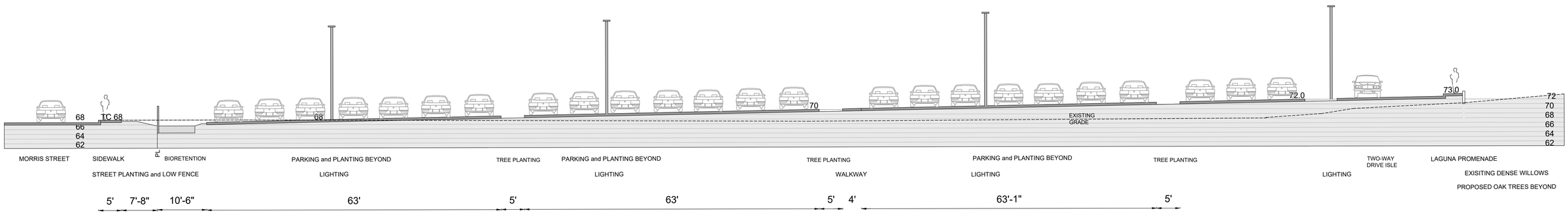
385 MORRIS STREET SEBASTOPOL CA 95472

APN 004-011-017 & 020

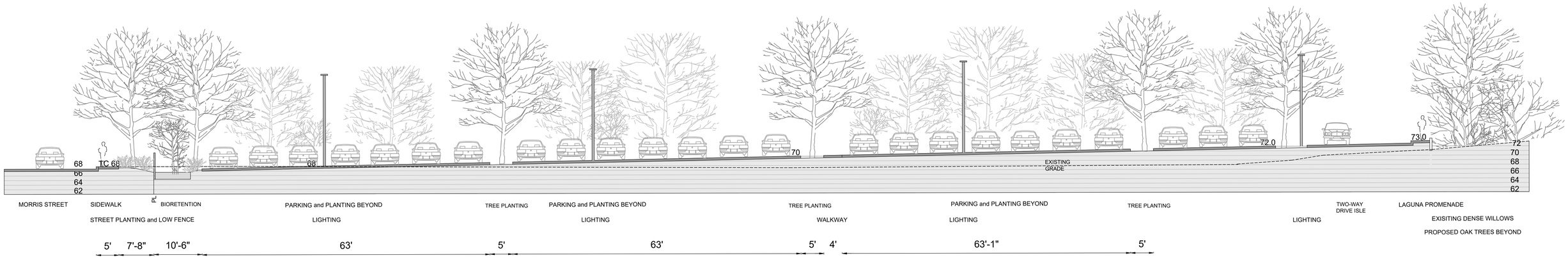
CONCEPTUAL SITE SECTION A-A

PLOT DATE:
05-06-2024

L1.2



SITE SECTION B-B



SITE SECTION B-B with PLANTING

0' 5' 10' 20'

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BATCH PLANT PARKING LOT

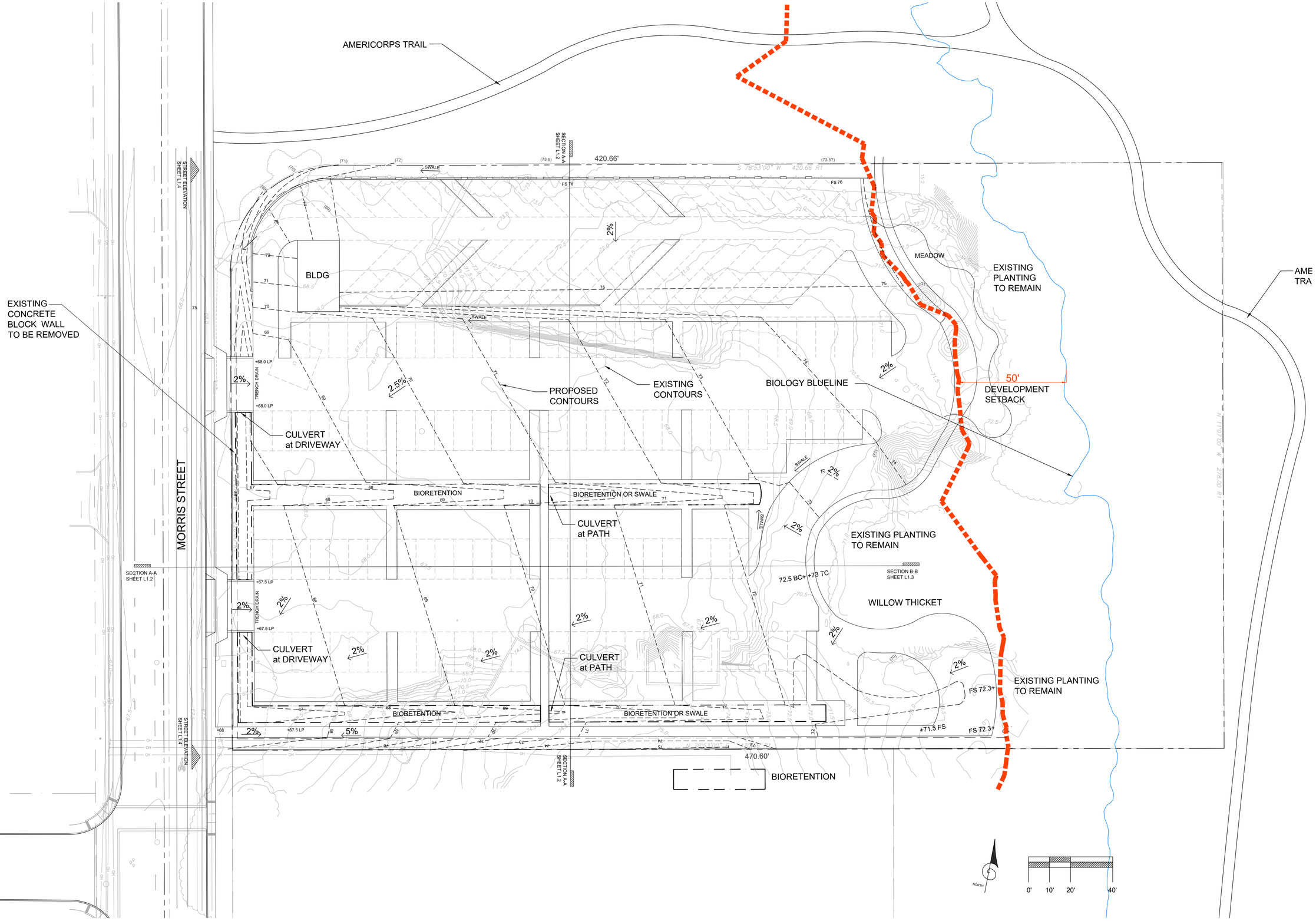
385 MORRIS STREET SEBASTOPOL CA 95472

APN 004-011-017 & 020

CONCEPTUAL SITE SECTION B-B

PLOT DATE:
05-06-2024

L1.3



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BATCH PLANT PARKING LOT

385 MORRIS STREET SEBASTOPOL CA 95472

APN 004-011-017 & 020

CONCEPTUAL GRADING PLAN

PLOT DATE:
05-06-2024

L2.0

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BATCH PLANT PARKING LOT

385 MORRIS STREET SEBASTOPOL CA 95472

APN 004-011-017 & 020

CONCEPTUAL LANDSCAPE PLAN

PLOT DATE:
05-06-2024

L3.0