

**Endangered Species Act
Non-Traditional Section 6 Grant Program
Habitat Conservation Plan Planning Assistance
FY2021**

PROJECT TITLE:

Sonoma County Regional Habitat Conservation Plan/Natural Communities Conservation Plan

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PROJECT COST:

Federal Share - \$566,250 Non-Federal Share - \$188,750 Total Cost - \$755,000

STATEMENT OF NEED

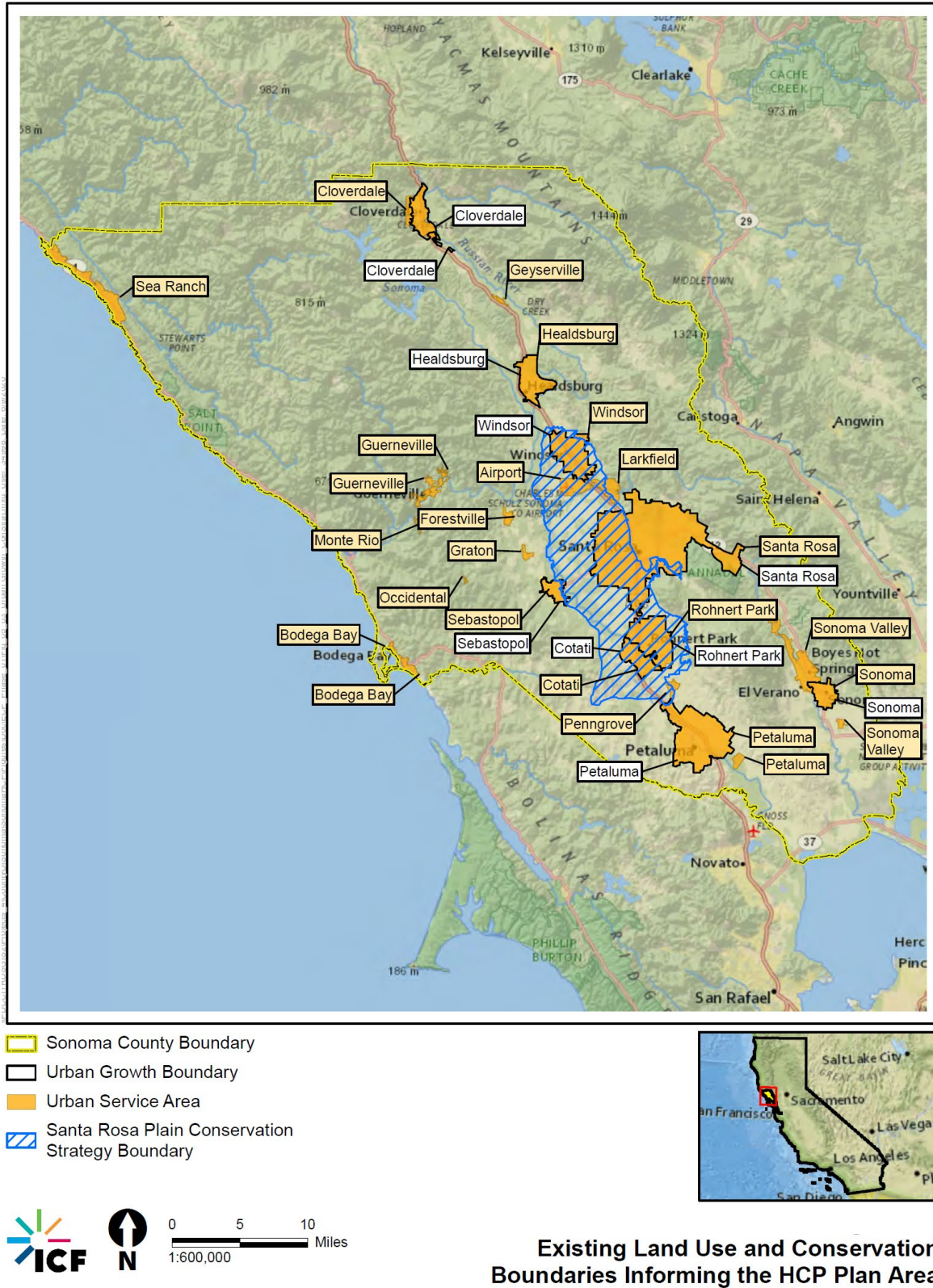
This proposal requests \$566,250 in federal grant funds from the Fiscal Year 2021 Cooperative Endangered Species Conservation Fund (Section 6 of the Endangered Species Act) Nontraditional Habitat Conservation Planning Assistance Program.

Geographic Description of Plan Area

The County will determine the scale of the HCP (or HCP/NCCP) plan area as part of the strategic planning conducted under this grant. At minimum, the plan area size would be similar to that of the Santa Rosa Plain Conservation Strategy which is approximately 75,000 acres. At most, the size of the plan area would cover the whole county which is 1,132,000 acres. Figure 1, below, provides a map of the county with the boundary of the Santa Rosa Plain Conservation Strategy area overlain, along with the locations of urban service areas and urban growth boundaries currently mapped in the county.

A narrowly focused HCP would have a boundary similar to the current limits of the Santa Rosa Plain Conservation Strategy (Figure 1, below). An HCP permit area focused on the Santa Rosa Plain presents the fastest and least costly path to meeting regulatory needs for endangered species in that region. However, an HCP focused just on the Santa Rosa Plain would not provide the County with coverage for its own linear transportation, infrastructure and recreational projects elsewhere in the County. A Santa Rosa Plain

HCP would also not include four of the County's eight incorporated cities. It also would not include all recovery areas identified by the U.S. Fish and Wildlife Service (USFWS) 2016 *Recovery Plan for the Santa Rosa Plain*. To address those needs, the County would need to prepare an almost countywide HCP (countywide except for baylands and Coastal Zone areas). Finally, a countywide HCP may be the only appropriate plan area to pursue a Natural Community Conservation Plan.



**Existing Land Use and Conservation
Boundaries Informing the HCP Plan Area**

Figure 1. Boundaries Informing the HCP Plan Area

Statement of Need

Like many Bay Area counties, Sonoma County has undergone rapid change in recent decades. Change is expected to continue over the next several decades as communities rebuild after the catastrophic wildfires of 2017 and 2019, as more people and businesses move to the region, and as existing businesses expand. This growth is expected to create conflicts with some of the County's many plant and animal species that are listed as endangered or threatened under the federal Endangered Species Act (ESA) and California Endangered Species Act (CESA). Accommodating economic growth while conserving listed and other special status species, and other natural resources, is an important County goal that requires foresight and good planning.

The Santa Rosa Plain exemplifies the County's challenge of balancing economic growth with listed and other special status species conservation. A large share of the County's growth has occurred, and will continue to occur, in the Santa Rosa Plain. This central County region also supports extensive seasonal wetlands and grasslands that provide habitat for four ESA and CESA listed as endangered plant species: Sonoma sunshine (*Blenosperma bakeri*), Burke's goldfield (*Lasthenia burkei*), Sebastopol meadowfoam (*Limnanthes vinculans*), and many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*). The Santa Rosa Plain and nearby lowlands are also the only habitat for the federally endangered Sonoma distinct population segment (DPS) of California tiger salamander (*Ambystoma californiense*). California tiger salamander is also listed as threatened under CESA statewide. Several non-listed special status species also occur within the Santa Rosa Plain and the wider county, for example, northwestern pond turtle, foothill yellow-legged frog (Northwest/North Coast clade), and burrowing owl (see Table 2).

Lands within the unincorporated County and several municipalities are occupied by these species, increasing the regulatory burden on a variety of private and public stakeholders. In the early 2000s, representatives from these stakeholders, in cooperation with the USFWS and California Department of Fish and Wildlife (CDFW), developed the Santa Rosa Plain Conservation Strategy (Conservation Strategy; U.S. Fish and Wildlife Service 2005) for the above listed species. An HCP/NCCP would update and leverage the immense effort already completed for the Conservation Strategy and provide for greater consistency in federal and State requirements. USFWS issued a Programmatic Biological Opinion (updated in 2020) based on the SRP Conservation Strategy; however, it was developed prior to CESA listing of California tiger salamander and therefore CESA requirements have differed. A Conservation Strategy implementation committee was formed, however an Implementation Plan was never created or adopted by local agencies, USFWS, or CDFW.

An HCP/NCCP would facilitate conservation of listed species by identifying contiguous blocks of suitable habitat conservation areas and establishing associated targets, and by promoting development within urban growth boundaries. Some of this information is available within the USFWS 2016 *Recovery Plan for the Santa Rosa Plain*, however an HCP would build on those efforts and, as a County plan, be more familiar to local developers, potentially translating into greater habitat conservation and potentially reducing associated mitigation land costs. An HCP would also contribute to the conservation of other special status species, reducing the likelihood of future listing and associated regulatory burdens. Significant conservation efforts in terms of land acquisition, management, and wetland creation and restoration have been undertaken to protect and stabilize populations of the four listed plant species and the California tiger salamander. Despite these efforts, long term monitoring of the status of California tiger salamander sub-populations shows continued decline in this Distinct Population Segment (Cook et al 2008, 2016, 2018). The conservation status of the listed plant species is not as well understood and uncertainty remains around whether populations are stable, declining, or increasing. However, the current population status does not support delisting these species in the foreseeable future (U.S. Fish and Wildlife Service 2016).

Additionally, few mitigation bank credits remain and the cost of those that do is well into the multi-six figures per acre range

An HCP would promote compliance with ESA for projects without a federal permitting nexus (i.e., those projects that also require a permit from a federal agency such as the U.S. Army Corps of Engineers), and the establishment of conservation lands. It would also encourage CESA compliance as an accompaniment to ESA compliance. Further, CESA and the NCCP Act mitigation and conservation standards complement and, in some ways, expand on ESA compliance, furthering species conservation and recovery. In terms of the regulatory burdens and mitigation costs, the County and private developers continue to face substantial challenges when undertaking activities on the Santa Rosa Plain. The Santa Rosa Plain Conservation Strategy provides some regulatory streamlining through a programmatic Biological Opinion issued by USFWS, but this pathway is only available to projects that have a federal nexus. This leaves projects that would affect only upland habitat of the California tiger salamander without a facilitated permit pathway. Further, the continued varying legal interpretations of Clean Water Act jurisdiction may remove the federal nexus for some projects impacting wetlands or other waters of the United States.

Natural Community Conservation Plan

The State of California is the only state to enact a law that closely complements the habitat conservation planning process of ESA. The NCCP Act encourages the development of multi-species, ecosystem-based plans that provide for the conservation and recovery of both listed and unlisted species within the plan area. The NCCP Act requires a plan to provide for the conservation of covered species and includes independent scientific input and significant public participation. When applied together, the ESA and NCCP Act bring their complementary strengths to conservation planning to provide greater conservation benefits than either Act alone. Information on the NCCP program can be found at <https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.

Anticipated Outcome/Expected Benefits

The Sonoma County HCP/NCCP would provide for the conservation of covered species (see Table 2 for the preliminary list of species that may be covered in the HCP/NCCP) in Sonoma County and the natural and semi-natural communities upon which they depend, including potential agricultural landscapes that support covered species. It would also provide a streamlined process for accommodating appropriate and compatible economic growth and development consistent with applicable federal and state regulations and local land use laws and associated general plans. At minimum, the HCP/NCCP would be designed to:

- Provide a comprehensive means for coordinating and standardizing the mitigation and compensation requirements of the FESA, NCCPA, California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and other applicable laws and regulations related to covered species and associated natural communities in Sonoma County. This will ensure that public and private actions will be governed equally and consistently, thereby reducing delays, expenses, and regulatory duplication.
- In combination with the past Santa Rosa Plain Conservation Strategy Plan serving as a roadmap for coordination and cooperation among various and ongoing conservation planning efforts occurring both within Sonoma County and in neighboring jurisdictions.
- Provide a scientifically sound and consistent basis for issuing the permits and authorizations necessary for lawful incidental take of covered species that have been listed as threatened or endangered pursuant to the terms of the FESA and/or CESA.

- Provide a scientifically sound and consistent process for the issuance of incidental take authorizations for covered species that are not currently listed but may be listed in the future without the imposition of additional mitigation or conservation requirements outside of the HCP/NCCP process.
- Reinforce the role of local government in overseeing local land use planning and decision-making.
- Encourage and support sustainable and conservation-based agricultural practices, recognizing that agriculture in Sonoma County plays an important role in both the local economy and the preservation of open space and habitat for a variety of species.
- Streamline and coordinate existing processes for review and permitting of public and private activities that potentially affect covered species by replacing the current project-by-project, species-by-species review and regulatory regime with a comprehensive plan and a less costly, more efficient and speedier approval process.
- Provide clear expectations and regulatory predictability for land users and conservation efforts related to the covered species and associated natural communities within Sonoma County by identifying relevant conservation requirements for ongoing and future activities.
- Provide for effective, landscape scale, conservation of the species covered by the plan and their habitats, including measures that contribute to species recovery.

Overall, the anticipated outcome of an HCP/ NCCP would be an increase in acres of suitable breeding habitat for all the wildlife species within the plan but especially with CTS. Also, we expect that there would be a reduction of impacts to breeding areas and reduction in habitat fragmentation. Enhancement of species numbers at the edges of their distribution should allow for future range expansion back into areas from which they have been extirpated, or into new areas that provide suitable conditions which are consistent with recovery plan distribution goals. The HCP/NCCP will improve habitat connectivity among existing protected areas or expand upon existing protected areas to reduce habitat fragmentation for several of the wildlife and plant species both on the Santa Rosa Plain and elsewhere.

Key HCP Progress to Date

The County recently drafted a technical report titled, *Sonoma County Habitat Conservation Plan: Preliminary Phase Strategic Planning*. The technical report contains the results of strategic planning for an HCP, providing initial strategic planning to determine the foundational elements of a potential HCP. The report provides an overview of the HCP development process, potential HCP applicants and eventual permittees, potential permit area, covered activities, covered species, and recommendations on the approach to HCP development. The approach is based on the potential scope and scale of the HCP. The report also provides an initial assessment of the development of an NCCP in conjunction with the HCP. The County continues to evaluate two options identified in the technical report:

1. A Santa Rosa Plain option (i.e., a targeted geography focused on incidental take coverage for the four listed plant species and the Sonoma DPS of the California tiger salamander); and
2. A County-wide option (i.e., County-wide plan covering more species).

Previously Awarded Section 6 Non-Traditional Grant Funding

No previous Section 6 Non-Traditional grants have been provided for this HCP. This would be the first such grant.

PURPOSE

landscape scale conservation of the covered species and their habitats, including measures to contribute to their recovery and potential delisting. In addition, we will be able to conserve natural communities at the ecosystem scale while accommodating compatible land uses. The HCP/NCCP will provide for effective, landscape scale conservation of the species covered by the HCP and their habitats, including measures that contribute to species recovery.

OBJECTIVES

The following Table 1 summarizes the proposed tasks to be accomplished during the period of performance pursuant to the stated need.

Table 1. Objectives for a Sonoma County HCP/NCCP

Objective Summary	Outcome/Deliverable	Milestones
1. Establish and Initiate Stakeholder Outreach and Science Advisory Program	The County will develop and implement a robust stakeholder and science advisory engagement program. Stakeholders will be invited to review and comment on various aspects of HCP/NCCP development.	Year 1- Year 2
2. Compile and Assess Baseline Information	Covered Species List Species Accounts Locations and Types of Covered Activities Species Habitat Models Assemble Land Cover Data Land Cover Types	Year 1
3. Develop Approach and Assess Feasibility	Preliminary Biological Goals and Objective for Species Impact Assessment Gap Analysis Monitoring and Adaptive Management Descriptions of Potential Conservation Measures Preliminary Conservation Strategy Avoidance and Minimization Measures Habitat-level Conservation Measures Species-level Conservation Measures Monitoring and Adaptive Management Preliminary Costing and Funding Analysis to Conservation Measures to Determine Feasibility	Year 2

INITIATION OR COMPLETION OF A HABITAT CONSERVATION PLAN

This proposal is for the initiation of an HCP, covering Phases 1 and 2 of an anticipated four phased process to HCP completion, as summarized in Table 1 and further described below. Phases 3 and 4 are not part of this proposal but are outlined below for informational purposes.

- **Phase 1:** Establish and Initiate Stakeholder Outreach and Science Advisory Program; Compile and Assess Baseline Information (Objectives 1 and 2)
- **Phase 2:** Develop Approach and Assess Feasibility (Objective 3)
- **Phase 3:** Develop Plan, Begin CEQA/NEPA

- **Phase 4.** Public Review and Permitting, Complete CEQA/NEPA

This section is organized by the objectives outlined in Table 1. Task 1 below is an overarching task for all objectives.

The County will be faced with many important decisions during HCP/NCCP planning. Many of these key decisions include issues that were first discussed during the Preliminary Phase, including which species will be covered, what activities will be covered, and what area the permits will cover. Nonetheless, preparation of an HCP document is a highly iterative process. The County will work with a consultant to determine the best approach to framing the critical information for HCP planning to support decision making. In some cases, decisions will be introduced, framed, and documented through a technical memo. In other cases, it may be more efficient to frame the topic and document the decision as a section of a draft chapter of the HCP. This approach will streamline HCP planning and provide helpful context for reviewers.

The County will prepare and provide review materials as described below. The County will revise these work products based on internal comments and then share them with FWS and CDFW for a broader review. This approach ensures the Services and CDFW have had the opportunity to review key materials in advance of receiving complete chapters or a fully compiled HCP.

Task 1. HCP Project Management and Meetings

This task includes monthly meetings with the Services and CDFW. This task also includes coordinating the direct project work of County staff and consultants throughout the lifecycle of the grant. Under this task, the County will exercise its standard procurement protocol to solicit the support of a consultant with experience and expertise in the development of Habitat Conservation Plans.

Deliverables

- Participation in up to 24 meetings with the County, Services, and CDFW held approximately monthly
- Preparation of meeting materials and follow up notes
- Consultant RFP in compliance with 2CFR200 and standard county procurement protocol
- Quarterly invoices

Objective 1. Establish and Initiate Stakeholder Outreach and Science Advisory Program

Task 2. Public and Stakeholder Outreach

Stakeholder outreach and establishment of robust stakeholder engagement process is often a component of regional HCP development, going beyond that required for CEQA and NEPA compliance. Stakeholders support is critical for maintaining momentum in HCP development, as well as in the successful adoption of regional HCPs. Contractor will work with the County to design and implement a robust stakeholder engagement process to solicit feedback on key issues and to ensure stakeholder needs are addressed. The County will release both an administrative draft for wildlife agency review and a public draft to ensure all stakeholders concerns are addressed. Addressing concerns raised by stakeholders in will minimize the number of public comments received on the HCP, minimize revisions required for the final and garner support for the overall program. A requirement of the NCCP would be to have independent science input into the NCCP process. Independent science input is also strongly recommended for any HCP. The science input will occur early in the planning process before an HCP is drafted in order to guide development of the HCP.

The membership of the Science Advisors will be based on their expertise of species and habitats and ecosystems found in Sonoma County. The Science Advisors will be selected by the Applicants (Sonoma County and cities and districts preparing the HCP) and Agencies (US Fish and Wildlife Service, National

Marine Fisheries Service and California Department of Fish and Game) with input from a broad-based Steering Committee which is providing advice and recommendations throughout the HCP process.

The principal task of the Science Advisors will be established science-based conservation and natural resource management standards to guide HCP preparation.

Objective 2. Compile and Assess Baseline Information

Task 3. Confirm Proposed Covered Species

Covered species are those species that will be listed on each ITP issued by the Services and CDFW (non-CESA species would only be covered by an NCCP and not a 2081(b) ITP). The Preliminary Phase technical report identified potential covered species, applied screening criteria, and developed initial lists of species likely to be covered under the minimum and countywide permit area scenarios. A consultant will assist the County in confirming the proposed covered species and will draft as a chapter section and appendix the text and tables describing the covered species consideration and selection process. Species accounts for the covered species are addressed in the next task.

This scope assumes that the County will be able to confirm the covered species based on existing and available data; no field surveys are included for this purpose.

Task 4. Develop Species Accounts

Sonoma County will prepare a species account (i.e., ecological profile) for each covered species that will be covered in the HCP. These species accounts provide an important foundation for the HCP effects analysis and conservation strategy. Draft species accounts will be provided for review to the County and the Services and CDFW to ensure that they are complete. These accounts will contain summaries of the important information needed to support the development of the HCP, not comprehensive compilations of all that is known about a species (i.e., not a treatise). Species accounts will be an appendix to the HCP.

Task 5. Confirm Plan Area and Permit Area

The plan area is the area analyzed in the development of the HCP, but it may include areas where covered activities will not occur. A permit area is also defined in an HCP and is the area that includes the locations of where all covered activities will occur. The Preliminary Phase technical report provided initial considerations regarding the plan area and permit area. The County will confirm the plan area and will draft in chapter format text describing the plan and permit area.

Deliverables Santa Rosa Plain HCP/2081, Countywide HCP/2081, Countywide HCP/NCCP

Up to two (2) drafts of a memo addressing plan and permit area. Work will include revisions to GIS maps developed in the Preliminary Phase. Subsequent drafts will be incorporated into the full administrative draft HCP.

Task 6. Confirm Covered Activities

The HCP must identify the activities that could result in take of covered species and that will be covered by the plan. The Preliminary Phase technical report addressed the covered activities criteria, selection process, data sources and a brief description of covered activities. A consultant will assist the County in expanding and refining the initial description of covered activities and will draft in chapter format the covered activities section of the HCP. Work includes up to three (3) days of site visits to inspect infrastructure or other resources that may be addressed in the HCP.

The County will develop GIS data reflecting where covered activities are assumed to occur. This information will be used in the effects analysis.

Task 7. Develop Species Habitat Distribution Models

All HCPs are required to quantify the level of take authorization requested for each covered species. The primary tool for quantifying take will be estimates of acres impacted or, in some cases, numbers of

occurrences or populations (of plants) impacted. These estimates will be based, in part, on species habitat suitability models, as well as field data of occurrence as available for the permit area. Species habitat distribution models (habitat models) have the advantage of predicting species occurrence throughout the permit area, in a consistent fashion for use in both the effects analysis and the conservation strategy. If adequate regional data exists on species habitat associations, habitat models can help overcome the inherent limitations of species occurrence data (occurrence data are often incomplete or imprecise). Habitat models will be based on existing land cover maps, in combination with other appropriate parameters such as elevation, soil type, proximity to different land cover types, and species movement distances (e.g., California tiger salamander). Final modeling methods and results will be incorporated into the species accounts. In some cases, existing habitat models may be used as-is or modified with current data.

The Preliminary Phase report identified 15 species as potential covered species. Species models may not be feasible for all covered species because of a lack of understanding of species habitat requirements, insufficient data, habitat parameters that occur on a scale too fine to map regionally, or a combination of these factors. It is assumed for the purposes of the scope of work that habitat models will be developed for up to 12 species for the HCP.

Objective 3. Develop Approach and Assess Feasibility

Task 8. Develop Preliminary Biological Goals and Objectives

Biological goals and objectives are a required element of an HCP. Biological goals are broad, guiding principles based on the conservation needs of the resources addressed by the HCP. Biological goals are often qualitative and aspirational in nature. In contrast, biological objectives are expressed as measurable conservation targets. Biological goals and objectives serve two important functions in an HCP—they act as a useful summary of the conservation strategy, and they provide the measurable, typically quantitative targets of the HCP that will be monitored during implementation. The biological goals and objectives will consider the regional conservation needs of the species as identified in the species accounts and will guide the development of conservation measures including avoidance, minimization, and mitigation measures.

Once the covered species list is confirmed, the County will prepare goals and objectives for each covered species for review by the Service and CDFW. Species recovery plans with recovery goals and objectives have been developed for some of the covered. These recovery plans will be used to help develop the goals and objectives for the HCP covered species. Biological goals and objectives for the species included in the Santa Rosa Plain Conservation Strategy will be heavily informed by that strategy and the current recovery plan.

For the NCCP, biological goals and objectives will be developed based on a 3-tiered hierarchy: landscape, natural community, and species. Additional biological goals and objectives will be developed at the landscape and natural community levels to address the regulatory requirement of the NCCP Act.

Task 9. Assess Effects and Level of Take

The County will evaluate each covered activity, as well as components of each covered activity, to identify the mechanisms that could result in direct or indirect effects on covered species or ESA-designated critical habitat (critical habitat must be evaluated because of the internal Section 7 consultation and biological opinion development the Services will be undertaking during permit processing). These impact mechanisms will be linked to each covered species in a matrix and narrative description.

The County will collaborate with the Services, and CDFW to identify the appropriate methods for measuring levels of take (e.g., area of habitat affected, number of individuals or populations taken) for each covered species in the permit area. The County will develop a draft memo including the stressors

affecting covered species and the proposed method for evaluating impacts. After initial review is provided by the County, Services, and CDFW, the County will refine and expand this analysis and will also develop a quantified assessment of impacts to covered species. Potential indirect effects to covered species will be describe in qualitative terms because indirect effects (and the resulting take from indirect effects) are difficult to quantify on a regional scale.

Since an NCCP will be pursued, this task will also include an evaluation—independent of covered species—of the effects of covered activities on natural communities and on wildlife connectivity, and an approach to quantifying loss of natural communities.

Task 10. Develop Preliminary Conservation Strategy and Conservation Alternatives

The County will coordinate with the Services and CDFW to develop a functional and practicable conservation strategy. The approach to the conservation strategy should emphasize laying a solid groundwork on which the mitigation measures will be built. Sonoma County should seek consensus on components of the conservation strategy as it is developed. Soliciting input from the Services and CDFW as the strategy is developed provides a better chance of the Services and CDFW accepting key elements of the conservation strategy later.

The County will develop mitigation measures to fully offset the impacts of the taking of each covered species. Species-specific mitigation measures will be developed that are practical, cost-effective, and clear. Sources used to develop the mitigation measures will include the following:

- Approved and in-process regional HCPs or conservation strategies that cover the same species;
- Federal or state recovery plans; and
- Practical management experience of local mitigation bankers and other landowners.

These mitigation measures will be adjusted or recombined to form different alternatives from which the County Services and CDFW can identify the final conservation strategy for inclusion in the public draft HCP.

The NCCP will address additional conservation requirements including—but not limited to—biological diversity, wildlife connectivity, natural communities, scientific studies and other elements that address the higher conservation standards required of an NCCP.

Task 11. Develop Preliminary Cost and Funding Plan

The Services must each make findings for permit issuance documenting the adequacy of the cost estimate and funding strategy. The County will develop a cost and funding plan for the HCP as required by the ESA. Costs associated with the HCP will be identified and estimated for the following:

- Implementing HCP mitigation measures;
- Conducting management and monitoring;
- Implementing habitat restoration and remedial measures;
- Facilitating land acquisition and due diligence (e.g., appraisals, pre-acquisition biological surveys, legal fees); and Administering HCP implementation.

DESCRIPTION OF ENTITIES UNDERTAKING THE PROJECT

Permit Sonoma is leading the strategic planning efforts to consider how to prepare an HCP. The County has had preliminary discussions with multiple stakeholders including, but not limited to County departments that may be part of the HCP include the Department of Agriculture/Weights and Measures, Department of Transportation and Public Works, and Sonoma County Regional Parks. All of these County

departments are expected to have activities or projects that could require take authorization. The County has also had input from representatives of the Wine grape Growers and other local jurisdictions who participated in the Santa Rosa Plain Conservation Strategy (2005) (i.e., City of Santa Rosa, Rohnert Park and Cotati). We will continue to include the entities who were part of the 2005 effort and other special districts, environmental groups or others who may also be interested in participating in the HCP/NCCP.

As potential participants express interest in the HCP/NCCP, the County will evaluate the type and scope of involvement of each additional participant in the context of role in HCP development and/or implementation. For example, a participant may wish to have their activities covered by the HCP/NCCP, but they may not want to be a permittee under the HCP/NCCP. In such cases, those participants would need to negotiate a process by which they would seek coverage from the County as needed. The benefit of this type of arrangement is that there is less involvement and commitment in efforts to develop and implement the HCP/NCCP, but this reduced commitment typically comes with higher costs to use the HCP/NCCP once permitted. Others may wish to be involved in HCP/NCCP development and implementation, holding their own permit or as a co-permittee.

ANTICIPATED OUTCOMES/ EXPECTED BENEFITS

Public benefits may include carbon sequestration, enhanced water quality, protection of view sheds, biodiversity conservation, and protection of pollinator habitat, which benefits surrounding farming communities. Passive recreation that is conducive to sensitive resources may also be permitted, where consistent with the Plan.

SPECIES BENEFITS

For the purposes of the table below, the minimal narrowly focused HCP/NCCP option is assumed which, would have a boundary similar to the current limits of the Santa Rosa Plain Conservation Strategy (Figure 1, above). If a county-wide HCP/NCCP were undertaken, the degree of benefits to non-Santa Rosa Plains Species would undoubtedly improve to higher levels.

Based on an initial analysis, the species in Table 2 are proposed for coverage in a Sonoma County HCP/NCCP. This list is preliminary and will require review and further assessment regarding likelihood to be affected by the covered activities, presence in the permit area, and other key considerations. This initial list of covered species will be updated as HCP/NCCP development progresses. The revised list of proposed covered species will be used to develop the HCP chapters, including detailed species profiles, an effects analysis, and a detailed analysis of the species conservation needs. As this detailed information is developed, it may become apparent that one or more of the proposed covered species no longer meets an evaluation criterion and, therefore, are dropped from the HCP. Similarly, the Services, CDFW, stakeholders, or the County may propose that certain species be added to the list.

Table 2. Projected Species Benefits

Covered Species	Expected Benefits	Federal / State Status	Degree of Benefit (low, medium, high)*	Justification**
Sonoma sunshine	Preservation and expansion of essential vernal pool habitat	Endangered/Endangered	High	The HCP/NCCP will cover 80% of the species range-wide habitat.

Covered Species	Expected Benefits	Federal / State Status	Degree of Benefit (low, medium, high)*	Justification**
Burke's goldfields	Preservation and expansion of essential vernal pool habitat	Endangered/Endangered	High	The HCP/NCCP will cover 90% of the species range-wide habitat.
Sebastopol meadowfoam	Preservation and expansion of essential vernal pool habitat	Endangered/Endangered	High	The HCP/NCCP will cover 100% of the species range-wide habitat.
Many-flowered navarretia	Preservation of essential vernal pool habitat	Endangered/Endangered	High	The HCP/NCCP will cover 100% of the species range-wide habitat.
Two-fork clover	Protection and management of existing populations	Endangered/Endangered	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
Chinook salmon – California coastal ESU	Protection and management of existing populations	Threatened /Species of Special Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
Coho salmon – central California Coast ESU	Protection and management of occupied habitat	Endangered/Endangered	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.

Covered Species	Expected Benefits	Federal / State Status	Degree of Benefit (low, medium, high)*	Justification**
Steelhead—central California coast DPS	Protection and management of habitat	Threatened / Species of Special Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
California freshwater shrimp	Protection and management of occupied habitat in Sonoma County	Endangered / Endangered	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
California tiger salamander – Sonoma County DPS	Prevent extirpation of the species	Endangered / Threatened	High	The HCP/NCCP will protect and manage occupied habitat in a large percentage of this species' range.
California red-legged frog	Protection and management of habitat	Threatened / Species of Special Concern	Medium	The HCP/NCCP will protect and manage occupied habitat in key locations of this species' range.
Northwestern pond turtle	Protection and management of occupied habitat in Sonoma County	None / Species of Special Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of

Covered Species	Expected Benefits	Federal / State Status	Degree of Benefit (low, medium, high)*	Justification**
				this species' range.
Western burrowing owl	Protection and management of occupied habitat in Sonoma County	None /Species of Special Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
Tricolored blackbird	Protection and management of occupied habitat in Sonoma County	Endangered / Species of Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.
Northern spotted owl	Protection and management of occupied habitat in Sonoma County	Threatened /Species of Special Concern	Low	The HCP/NCCP will protect and manage occupied habitat in a small percentage of this species' range.

TIMELINE:

Objective 1. Establishing and Initiating Stakeholder Outreach and Science Advisory will commence upon notification of grant award, currently assumed to be mid-2021. Work may continue through the conclusion of the grant.

Objective 2. The objective for compiling and assessing Baseline Information will commence upon notification of grant award, currently assumed to be late -2021. Work is expected to conclude by the end of year 2 of the grant.

Objective 3. The objective of developing an Approach and Assess Feasibility, 12 months after grant award (Assumed to be late spring or early summer 2022). Work will continue through the conclusion of the grant.

LOCATION/MAPS

At the smallest scale, the County contemplates an HCP that matches, or is close to, the boundary of the Santa Rosa Plain Conservation Strategy (see Figure 1 above). At the largest scale, the County contemplates a countywide HCP/NCCP.

INFORMATION TO SUPPORT ENVIRONMENTAL COMPLIANCE REVIEW REQUIREMENTS

While the Fish and Wildlife Service has the responsibility for making the final determination regarding compliance with Federal laws the proposed HCP and NCCP will comply will all of the Following:

- National Environmental Policy Act (NEPA).
- Endangered Species Act (ESA).
- National Historic Preservation Act (NHPA).
- California Environmental Quality Act (CEQA)
- California Endangered Species Act (Fish & G. Code § 208)
- Other Permits –Including 404 of the Federal Clean Water Act, 401 of the State Clean Water Act.

DATA MANAGEMENT AND SHARING

Deliverables will be provided to CDFW, USFWS, and other State and Federal Agencies, as appropriate, in Microsoft Word format to facilitate commenting and response to comments using the Track Changes feature. This will also allow the use of Track Changes so that agency staff can readily see how the chapter text changes between versions. Figures, graphics, and model outputs will likely only be available as PDF files. All materials developed for public release will be posted on the County's PRMD website to a new (yet-to-be added) HCP/NCCP page.

PROGRAM PRIORITIES

The proposed project will address conservation needs of up to 12 federally listed species. Planning for at least one of these species, Sonoma Distinct Population Segment (DPS) of California tiger salamander, is urgently needed as some researchers have indicated that the species could be extirpated from its range on the Santa Rosa Plain without such planning and conservation that would reduce continued upland habitat fragmentation and being pool loss. A conservation strategy will be developed for each covered species as part of the project. Actions that will be considered include habitat creation, enhancement, restoration, and/or preservation. By having a science driven strategy, we will restore trust with local communities by expanding the lines of communication with USFWS, CDFW, local water districts and Tribes. We will also strike a regulatory balance by ensuring the ESA decisions and actions are based on strong science and a thorough analysis.

BUDGET NARRATIVE

The Cost Estimate Narrative below summarizes project expenditures to complete this project and mirrors the budget spreadsheet.

Useful life: N/A

Program Income (\$): \$0 There is no program income associated with this project.

General Expenses (\$): \$0 There will be no purchases of minor equipment.

Major Equipment (\$): \$0 There will be no purchase of major equipment.

Travel/Training (\$): \$0 Travel and/or Training is not included in this budget or project

External Contracts (\$):

Costs include staff costs for Sonoma County annual salary and benefit rates. The assumption is that a state Personal Year (PY) is 2,080 working hours/year.

- **Senior Environmental Specialist.** The Senior Environmental Specialist will be involved in all aspects of the grant and estimated breakdown of hours/task is noted below
 - Annual Salary = \$105,151
 - Annual Benefit Rate = 43%
 - 0.6 PY x 2 Years = 1,248 Hours/Year x 2 = 2,496 Total Hours
 - Hours Per Task/Year
 - Task 1 : Project Management 200 Hours per year
 - Task 2 : Technical Analysis 648 Hours per year
 - Task 3 : Outreach 400 Hours per year
- **Grant Manager.** The County Grant Manager will manage and coordinate all aspects of the grant funding (i.e., Accounting, Cost Share Documentation, Quarterly Reporting, Support of the County's Procurement Procedures and Overall Record Keeping
 - Annual Salary = \$109,167
 - Annual Benefit Rate = 41%
 - 0.1 PY x 2 Years = 208 Hours/Year x 2 = 516 Hours

The County will exercise its standard procurement policy and follow the requirements of 2 CFR Part 200 to solicit the support of a contractor with the experience and expertise required to facilitate and develop an HCP and NCCP. The costs for a consultant are an estimate of not to exceed costs based on an analysis of similar planning efforts in the California. A full description of estimated consultant costs/tasks are included in Table 3. Sound project management improves the efficiency of obligations associated with this grant. The consultant will be tasked with managing activities associated with this grant including, but not limited to:

1. Approved statement of work and budget
2. Administrative requirements of 2 CFR Part 200
3. Applicable state requirements.

Sonoma County Counsel is included as an External Contract Cost due to Permit Sonoma's billing procedures. Actual costs may be significantly higher and the County will bear the responsibility of an increase.

Costs for CDFW participation in this project are a rough estimate and may need to be adjusted based to include the fully burdened cost of their involvement.

Table 3. Costs Estimate Table

Task Summary	Estimated Federal Share	Estimated Match	Estimated Total Cost
1. Project Management	\$180,000	\$60,000	\$240,000
2. Stakeholder Outreach	\$93,750	\$31,250	\$125,000
3. Confirmed Proposed Covered Species	\$37,500	\$12,500	\$50,000
4. Develop Species Account	\$26,250	\$8,750	\$35,000
5. Confirm Plan and Permit Area	\$15,000	\$5,000	\$20,000
6. Confirm Covered Activities	\$37,500	\$12,500	\$50,000
7. Develop Species Habitat Distribution Models	\$41,250	\$13,750	\$55,000
8. Develop Preliminary Goals & Objectives	\$26,250	\$8,750	\$35,000
9. Assess Effects and Level of Take	\$30,000	\$10,000	\$40,000
10. Develop Conservation Strategy	\$60,000	\$20,000	\$80,000
11. Develop Cost & Funding Plan	\$18,750	\$6,250	\$25,000
TOTAL	\$566,250	\$188,750	\$755,000

In-Kind Match Description (\$):

- The County will contribute \$188,750 in match funds from set-aside General Funds intended for the purpose of developing a Habitat Conservation Plan and County Department specific funding (i.e., Force Labor).

CONFLICT OF INTEREST DISCLOSURE

There are no conflicts of interest with regard to this proposal.

SINGLE AUDIT REPORTING STATEMENT

CDFW submitted a Single Audit Report to the California Department of Finance (DOF) for the most recently closed Fiscal Year. DOF compiles and submits a single Audit Report on behalf of the State of California. The report (#719482) is available on the DOF website, located here:

http://www.dof.ca.gov/Programs/OSAE/Audit_Reports/California_Audits_and_Accountability_Reports/

INDIRECT COST STATEMENT

CDFW is a U.S. State government entity receiving more than \$35 million in direct Federal funding each

year. The indirect cost rate proposals are submitted to the U.S. Department of the Interior. Currently, the approved FY19/20 rate is 27.16%. The FY21/22 rate proposal will be submitted for approval and is subject to change.

OVERLAP OR DUPLICATION OF EFFORT STATEMENT

There are no overlaps or supplication between this application and any of our Federal applications or funded projects, in regards to activities, costs, or time commitment of key personnel application, we will immediately notify the U.S. Fish and Wildlife Service point of contact identifies in this Funding Opportunity in writing.

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DATE:

February 11, 2021