

From: [Renate Lee](#)
To: [Cecily Condon](#)
Cc: [Claudette Diaz](#)
Subject: Re: Can ranchers repair livestock control fences in Riparian Corridors in the proposed LCP, without CDP's, hearings and biological resource assessments?
Date: Wednesday, May 10, 2023 9:49:54 AM
Attachments: [Screenshot 2023-05-08 at 12.50.44 PM.png](#)

Good morning, Cecily and Claudette,

Thank you in advance for your consideration with the email question I sent yesterday.

I'm sure this has already crossed your minds, but it hadn't crossed mine until after I hit send yesterday :/

As seen below in item 2 of the proposed LCP glossary definition of ESHA, if "perennial and intermittent rivers, streams and their tributaries" remain in the automatic designation of ESHA, but Riparian Corridors are removed, there will still be ESHA buffer protections in place for the streamside corridors up to 50ft for repairs and maintenance (and 100 feet or more for new development). Title 14 restricts repairs and maintenance to 50 ft from ESHA, so if the stream is ESHA, there would still be a regulatory setback of 50 feet for repairs, which would provide the habitat protections I imagine the proposed LCP is designed towards.

But if Riparian Corridors are left in the proposed LCP as automatic ESHA, then technically, a fence repair without CDP can't happen within 150 feet of a stream. The proposed LCP Riparian Corridor is 100 ft, and if all ESHA, the Title 14 repair setback of 50 feet pushes any allowed repair to 150 feet away from the stream.

Today, livestock control fences are allowed in Riparian Corridors per the County's RC Combining District, with certain setbacks (for example, "

installing and maintaining a livestock fence at 60 ft from the top of bank is allowed per zoning without a CDP. But with the proposed LCP, that fence is untouchable without a CDP, public hearing and biological resource assessment. And instead of the 50 ft setback for even a repair, the new setback becomes 150 ft.

Environmentally Sensitive Habitat Area: Defined by the California Coastal Act Section 30107.5 as “Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.”

In the Sonoma County Local Coastal Plan, environmentally sensitive habitat areas include those areas which meet one or more of the following criteria:

- (1) Habitats containing or supporting “rare and endangered” species as defined by the California Department of Fish and Wildlife and/or the U.S. Fish and Wildlife Service.
- (2) Perennial and intermittent rivers, streams, their tributaries, and associated riparian habitat.
- (3) Coastal tide lands and marshes.
- (4) Coastal and offshore areas containing breeding or nesting sites and coastal areas used by

Page 7

Glossary

Sonoma County Local Coastal Plan | Planning Commission Recommended
Draft

migratory and resident water-associated birds for resting and feeding.

- (5) Marine mammal haul out areas.
- (6) Areas used for scientific study and research concerning fish and wildlife.
- (7) Lakes and ponds including associated shoreline habitat.
- (8) Wildlife refuges and reserves.
- (9) Sand dunes.

I would contend that the protections envisioned by the proposed LCP are reasonably and fully applied through the application of ESHA on the waterways, without including the Riparian Corridors.

Thank you,
Renate

On May 9, 2023, at 3:16 PM, Renate Lee <renatelee@sbcglobal.net> wrote:

Hello Cecily and Claudette,

Thank you both for hosting the meeting in Bodega Bay last Monday. There was a lot of content discussed that day, which we all appreciated!

Thank you as well for the progress that's been made since January with Ag in the proposed LCP, especially with the changes that were discussed re fences, Timber “grazing”, and Ag Enterprise.

While there remain a few areas of the proposed LCP that are still of concern that would seem to have a straightforward path to resolution (e.g. reinstating Agriculture or Livestock Grazing Operations as a Principally Permitted Use in RRD, under the umbrella of Resource Development, since Grasslands are a resource), the question we posed of how to legally repair a livestock fence in a Riparian Corridor seems to actually be one of the thorniest. With your expertise in project review and the LCP, I was hoping you could evaluate the situation and help us find a way forward that makes sense for the environment and AG operators?

We are simply trying to determine if and how ranchers will be able to repair fences that are within 100 feet of a perennial or intermittent creek or stream, if the proposed LCP is adopted (which maps and designates ESHA over all Riparian Corridors.)

I originally asked Gary Helrich this question by telephone call, a few months ago, and he relayed to me that the

coastal regulations allowing repairs and maintenance should apply to an existing fence in a RC, at least outside of a 20 foot setback, such that ranchers would be able to maintain and repair existing livestock control fences.

As you know, repairs and maintenance are allowed per Chapter 26C Coastal Zone Permit Regulations

(7) Repair and maintenance activities which do not result in an addition to or enlargement or expansion of the object of such activities, except as otherwise specified in Subchapter 7, Title 14, California Administrative Code and any amendments thereafter adopted.

However, per Subchapter 7, Title 14, this repair/maintenance exemption, which would otherwise cover fence repairs, is not allowed in areas designated ESHA.

(a) For purposes of Public Resources Code Section 30610(d), the following extraordinary methods of repair and maintenance shall require a coastal development permit because they involve a risk of substantial adverse environmental impact:

(3) Any repair or maintenance to facilities or structures or work located in an environmentally sensitive habitat area, any sand area, within 50 feet of the edge of a coastal bluff or environmentally sensitive habitat area, or within 20 feet of coastal waters or streams that include:

(B) The presence, whether temporary or permanent, of mechanized equipment or construction materials.

In the case of a fence repair, the construction materials are wire, t-posts, wood braces, shovels, clips and a posthole digger.

My understanding of the impact here, is that with the proposed LCP, fence repairs outside of 20 feet of a stream or creek will no longer be allowed using the repair and maintenance exemption, because it's no longer a simple coastal stream designation or a Streamside Conservation area (per Sonoma County Riparian Corridor regulations) but instead ESHA.

If that's correct, then what does it take to pull a CDP in ESHA? Of course, these RC's are in the Coastal Commission's Appeal Jurisdiction, and when a CDP is required, a public hearing is also always required. Could Permit Sonoma issue administrative CDP's for fence repair in ESHA, or waive CPD requirements for fence repairs? Or because of the jurisdiction, is this not possible? What are the fines for undertaking a repair in ESHA without permit? I understand they can be \$750 per day, for up to 5 years. And could reach \$22,500. Per the proposed LCP, I also see that a CDP would require a Biological Resource Assessment, which I've been told is typically \$8,000-10,000.

It would seem the simplest approach would be to designate Riparian Corridors as Potentially ESHA and not Default ESHA. Then, when a development activity is proposed, the finding of ESHA can be determined, and the applicant can bear the costs for entering into a development request. But blocking repairs and maintenance with the proposed ESHA overlay, and putting the onus on landowners / ranchers to petition that they aren't ESHA will lead to unnecessary conflicts and steep costs.

In support of this notion, the Coastal Act regulation differentiates Stream from ESHA in Title 14, so there is already evidence that the Coastal Commission hasn't conflated all RC's with ESHA.

Thank you so much for looking at this! I really hope you are able to see a path forward!

Best,
Renate
(415) 367-5069 cell

<Grazing in Riparian Corridor.pdf>
<Grazing and fences in ESHA .pdf>
<Simple Livestock Fence Repair Example.pdf>

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From: [Renate Lee](#)
To: [Cecily Condon](#)
Cc: [Claudette Diaz](#)
Subject: Can ranchers repair livestock control fences in Riparian Corridors in the proposed LCP, without CDP's, hearings and biological resource assessments?
Date: Tuesday, May 09, 2023 3:18:55 PM
Attachments: [Grazing in Riparian Corridor.pdf](#)
[Grazing and fences in ESHA .pdf](#)
[Simple Livestock Fence Repair Example.pdf](#)

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Renate
(415) 367-5069 cell

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From: [Denny](#)
To: [Claudette Diaz](#)
Subject: 1 May LCP meeting
Date: Monday, May 15, 2023 5:40:51 PM

EXTERNAL

Hello Claudette,

I am Denny Tibbetts, property owner on Estero Lane. Cecily introduced us after the April 4th BOS meeting. It was good to see you in Bodega Bay at the 1 May meeting. I want to thank Permit Sonoma as well as Supervisor Hopkins for providing the forum addressing agricultural concerns. I appreciate that the proposed Estero access points were included in the discussion. All of the land surrounding the Estero is designated agriculture so it makes perfect sense it was included in the agenda.

I appreciate Lynda's endeavor to resolve the proposed public access points issue on map 10, with the suggestion that Permit Sonoma outline or shade the entire Estero. At first I thought this approach had merit - at least it is accurate that the state of California has control of tides and submerged lands through the state Lands Commission. On further reflection, I realized this approach was flawed and presented serious environmental and management problems that would compromise the pristine natural resource values, in particular the unique wetland areas. It would also infringe on private property rights and further encourage trespassing. Since that meeting, I have looked at other counties' LCPs, in particular Marin and San Mateo County where such maps do not exist. In the PERMIT Sonoma Discussion Points prepared for the April 4th meeting, it states that removing these proposed public access points would be consistent with the Coastal Act. I believe the option to remove these points these proposed public access points is the best course of action.

Thank you for your consideration,

Denny Tibbetts
Estero Lane, Bodega Bay

Sent from my iPad

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From: [Beth Bruzzone](#)
To: [Claudette Diaz](#)
Subject: LCP Statement
Date: Monday, May 22, 2023 11:37:37 AM

EXTERNAL

Hello Claudette....

The August 2022 LCP Revision is an overwhelming, behemoth of a document, as you well know. There is so much information, so many layers to the onion so to say, of policy, that it is nearly impossible as a Community Volunteer and Agricultural Advocate, with a full time occupation outside of my volunteer work, to go through every last line of policy and “catch” everything that conflicts with not only the Coastal Act, but also the Categorical Exclusions.

Last November when I stumbled upon proposed fencing policy that will negatively impact agriculture in the Open Space Element, I realized there is policy scattered throughout the entire LCP that impacts Agriculture. I seriously doubt in the limited time we have to work on this document, that all errant or misplaced policies will be located. Therefore, I propose the following statement appear not only in the Introduction of the LCP, but also at the very beginning of the Agricultural Element, Land Use Element, and Open Space Element.

> “ No policy shall be in conflict with Categorical Exclusion Order E-81-5, Adopted 1981”

This policy was specifically asked for by Sonoma County Supervisors prior to its implementation in 1981 and approved by the Coastal Commission by a 2/3rds vote.

I do not think any of us want to see a repeat of what is occurring in Marin. Sonoma County is already mirroring Marin County with a drawn out LCP process, complete with Agriculture insisting in a seat at the table late in the game. I hear the Marin County LCP is still a contentious document and not fully implemented.

Thank-you, Claudette for being willing to step in and assist the public with the LCP.

Take Care.....

Beth Bruzzone
Bodega/Valley Ford CMAC, Vice Chair
Sonoma RCD Director

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June 22, 2023

Ms. Claudette Diaz
Project Planner
County of Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

Sent Via Email To: Claudette.Diaz@sonoma-county.org

RE: Local Coastal Plan Update

Dear Ms. Diaz,

Thank you for the opportunity to review and comment on the draft Sonoma County Local Coastal Plan Update. We appreciate the effort that has gone into updating this important long-range planning document as we plan for the future of our vital coastal resources.

As you may be aware, LandPaths is a local 501c3 non-profit organization whose mission is to *foster a love of the land in Sonoma County*. We accomplish this through environmental education, and land conservation and stewardship locally. One of our core beliefs is that everyone, from the wealthiest to the most marginalized communities should have and needs access to the awe and inspiration of nature that defines this beautiful place we call home, Sonoma County.

We also know from direct experience the challenges to find balance between public access, public safety, resource protection and private property. The future of our County demands we face this challenge. More and more science-based data is proving what we know instinctively, that time in nature is good for us. Our County's commitment in public access to nature is one of the tools we have to invest in our community's mental and physical health, well-being and life outcomes. In our current mental health crisis, the need for access to nature is felt more acutely. We need only to look at our experience with Covid 19 and the outpouring to our local parks as an example of the solace nature provides. Furthermore, we believe that "*relationship to place*" is one of the defining characteristics of what makes Sonoma County unique and is essential as we look to the actions needed to address climate change.

We know well the critical need to strike a delicate balance between public access and protecting cultural resources, public safety, private property, public health and the environment. To that end, we support the County's efforts to further public access, while at the same time protecting the diverse resources our County has to offer. Working together through public-private partnerships, we believe it is possible to create a comprehensive network of public accessways that connects the California Coastal Trail corridor to existing and proposed regional and local trails throughout the County all the way to the Sonoma Coast. The goals, policies and objectives set forth in the Local Coastal Plan Update would enable us, collectively, to achieve just that. Our County's Ag Preservation & Open Space District is just one example of an agency that is charged with investing our tax dollars into projects that overall balance the goals of land and agricultural protection with public access opportunities to benefit the public trust.

We believe a critical component to the success of any future trail network is the incorporation of low-cost overnight camping facilities which would serve to further expand the range of camping experiences currently available in the County. By offering tent or small vehicle campgrounds, hike-in and primitive campgrounds, hostel and sleeping cabin facilities (potentially using existing buildings and structures) in previously disturbed areas, we can broaden the depth of the nature experience, further connect visitors with the land and offer opportunities that may otherwise be out of reach for some residents.

Offering this type of public access must be done in concert with the on-going protection of environmentally sensitive habitat areas. By carefully locating, operating and maintaining public access facilities outside mapped sanctuary preservation areas and conservations, we can offer educational opportunities to access these critical resources while also ensuring they are properly protected and preserved.

Similarly, we support the County's efforts to develop vegetation management guidelines to improve habitat health and reduce the risk of wildland fire, without restricting public access to the coast. We also support prioritizing the use of non-chemical methods for prevention and management such as physical, mechanical, cultural, and biological controls.

We look forward to continuing our participation in the public comment process and plan for the future of our vital coastal resources.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lee Hackeling & Craig Anderson", with a stylized flourish at the end.

Lee Hackeling & Craig Anderson
Programs Director & Executive Director

From: [Renate Lee](#)
To: [Tracy Lyons](#)
Cc: [district5](#); [Leo Chyi](#); [Cecily Condon](#); [Scott Orr](#); [Claudette Diaz](#); [Ross Markey](#)
Subject: Re: Monday, May 1 LCP Meeting Agenda
Date: Monday, May 01, 2023 8:30:15 AM
Attachments: [Grazing in Riparian Corridor.pdf](#)
[Grazing, fences and ESHA .pdf](#)
[Simple Livestock Fence Repair Example.pdf](#)

Thank you all so much for hosting today's LCP workshop in Bodega Bay! We are all really looking forward to it!

In the interest of time and preparation, I am sending along a few additional questions/issues that have come up in the community re grazing and Ag fence repairs in Riparian corridors related to the proposed LCP ESHA maps.

I realize this is last minute, but if there is any chance this component to fences and grazing could be considered at today's workshop, that would be greatly appreciated.

Thank you again,

Renate Lee

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On Apr 28, 2023, at 5:27 PM, Tracy Lyons <Tracy.Lyons@sonoma-county.org> wrote:

Good evening,

We're looking forward to gathering on **May 1st at 10:00am at Bodega Bay Yacht Club** (565 Smith Brothers Rd., Bodega Bay). In an effort to accommodate as many people as possible, we've confirmed everyone who RSVP'd. However, we will be short a handful of chairs. Please bring a folding chair or stool if possible.

Here's the agenda for the day:

AM:

Staff Introductory Presentation/Response to Ag Concerns

Ag Fencing

Grazing in Timberland

Easements

PM:

Public Access Points Presentation by Parks & Permit Sonoma

Estero Lane Public Access Mapping

If you plan to stay for both the morning and afternoon sessions, please plan to bring a bagged lunch or make plans to purchase lunch from a local restaurant.

Best regards,

Tracy Lyons

Field Representative

Supervisor Lynda Hopkins

575 Administration Drive 100A

Santa Rosa, CA 95403

707.565.2212

MOORE BIOLOGICAL CONSULTANTS

June 1, 2023

Mr. Peter Prows

Briscoe, Ivester & Bazel, LLP

235 Montgomery Street, Suite 935

San Francisco, California 94104

Subject: PUBLIC ACCESS TO ESTERO AMERICANO, SONOMA COUNTY,
CALIFORNIA: IMPACTS TO SENSITIVE BIOLOGICAL
RESOURCES

Dear Peter:

I understand Sonoma County is now considering mapping the entire Estero Americano as being available for “Public Access” in the Sonoma County Local Coastal Plan (SCLCP) update. This possible action raises even greater concerns regarding potential impacts to wetlands, sensitive habitats, and sensitive species in and near the Estero resulting from public access than those described in my February 2022 letter (Attachment 1), at which time only a few “Public Access Points” were shown as dots on a map in the public review draft SCLCP update (Sonoma County, 2021).

The meaning of dots on maps is widely, and often liberally interpreted by the regulated public. For fishing enthusiasts, a dot on a map along a waterway says “come on out and fish”. But the dot does not describe exactly where – how big is the dot? A well-educated and law-abiding fisherman told me a couple of weeks ago about his trip to a dot on a map in a foothill county. He parked at the parking lot, started fishing near the truck, and then went off “cross country, through a gate, and over a couple of fences”. Horrified, I asked “on whose property?”. He had no idea.

A map with the entire Estero Americano shaded with a color defined as “Public Access” could be catastrophic for the Estero. Approximately 15 miles of sensitive mudflats and emergent wetlands along the shoreline, much of it on private property, would be opened up to trampling and trespass. As described in my February 2022 letter, large groups of kayakers in the Estero have been documented coming ashore by wading through expansive mudflats and traversing sensitive wetland habitats situated between the open waters of the Estero Americano and dry land.



Source: Estero Americano Preserve website (SLT, 2022).

In light of the significant and well documented habitat degradation the Estero Americano has suffered from human activities, it would be more appropriate for the County to focus on habitat restoration and preservation, rather than making things worse. From an ecological perspective alone, encouraging and facilitating public access throughout the Estero Americano would likely result in far greater direct and indirect impacts than those resulting from more limited and controlled public access, with posted notice to boaters that the most of the bordering lands are both ecologically sensitive and private property.

Please call me at (209) 745-1159 with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Diane S. Moore', with a stylized, cursive script.

Diane S. Moore, M.S.

Principal Biologist

References

Sonoma County. 2021. Sonoma County Local Coastal Plan Update, Public Review Draft. June 22. <https://sonomacounty.ca.gov/PRMD/Press-Release/Permit-Sonoma-Releases-Draft-Local-Coastal-Plan-to-Protect-Sonoma-Coast>.

Attachment 1

February 2022 Letter Regarding Biological
Impacts of Proposed Public Access Points
along the Estero Americano

MOORE BIOLOGICAL CONSULTANTS

February 23, 2022

Mr. Peter Prows
Briscoe, Ivester & Bazel, LLP
235 Montgomery Street, Suite 935
San Francisco, California 94104

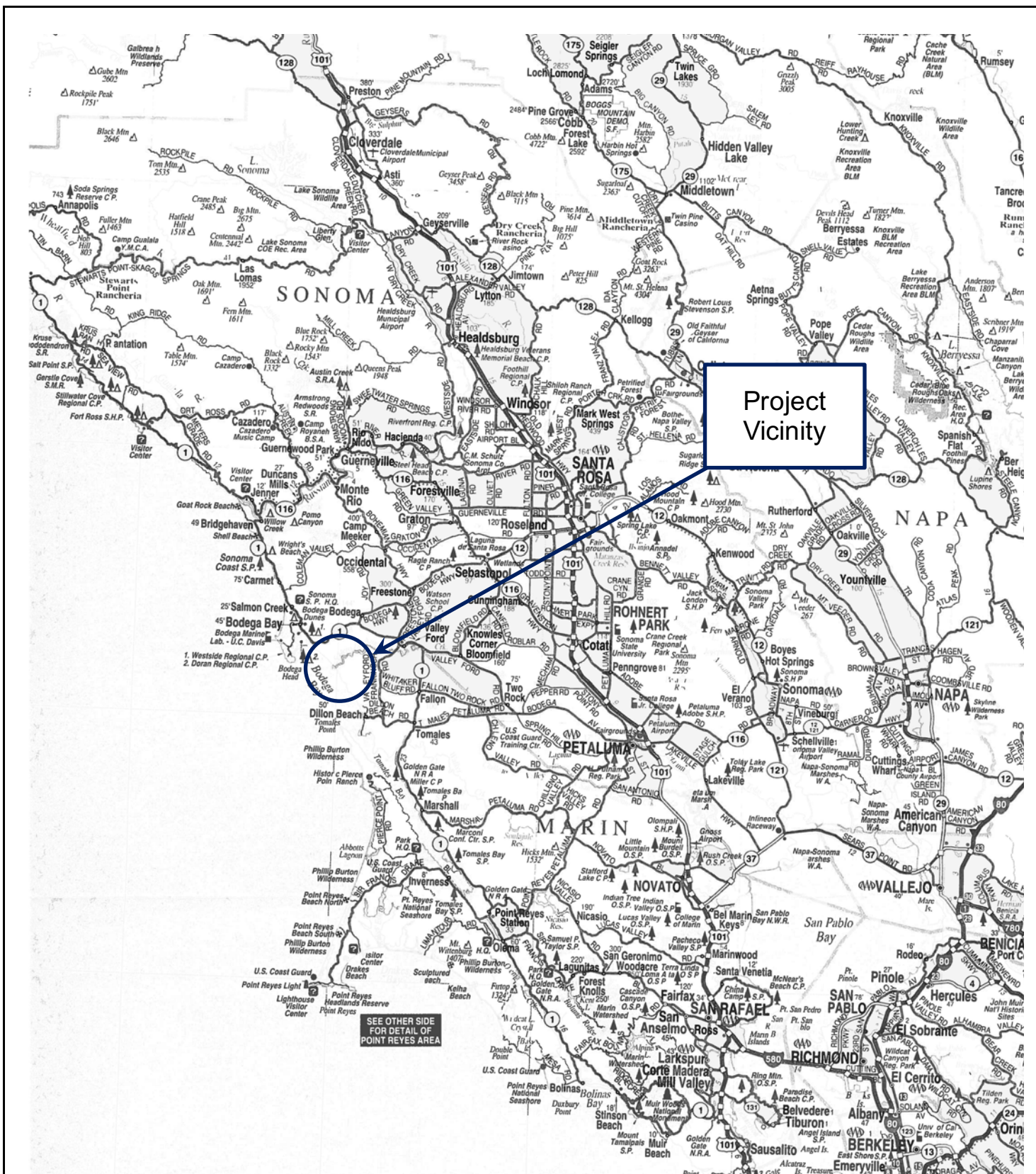
Subject: PROPOSED ESTERO AMERICANO PUBLIC ACCESS POINT “K-2”,
SONOMA COUNTY, CALIFORNIA: BIOLOGICAL ASSESSMENT

Dear Peter:

I understand that Sonoma County is proposing a Public Access Point along the Estero Americano, approximately 4 miles west of Valley Ford, in Sonoma County, California (Figure 1). The proposed Public Access Point is in an area of unnumbered sections in Township 5 North, Range 10 West of the USGS 7.5-minute Valley Ford topographic quadrangle (Figure 2).

The proposed Public Access Point is mapped as “Access Point/Trailhead K-2” in the public review draft Sonoma County Local Coastal Plan (SCLCP) update (Sonoma County, 2021) (Attachment A). This assessment addresses potential impacts of public access to wetlands, sensitive habitats, and sensitive species in and near the proposed Public Access Point.

On October 6, 2021, I conducted a reconnaissance level survey of the proposed Public Access Point. This assessment provides an overview of sensitive biological resources in the area and identifies potential impacts to biological resources resulting from increased public access.



Source: California State
Automobile Association

**Moore Biological
Consultants**



0 9 18 Miles

FIGURE 1

PROJECT VICINITY



Source: USGS 7.5' Quadrangles
VALLEY FORD & BODEGA HEAD , CA


 Sonoma Land Trust

Figure 2

Moore Biological
Consultants

0 1,000 2,000



Map Date: 02/23/2022

USGS

**Estero Americano -
Potential Public Access Point K-2
Sonoma County, CA**

Project Location and Setting

The proposed Public Access Point is along the north bank of the Estero Americano, approximately 4 miles west of Valley Ford, in Sonoma County, California (Figure 1). The proposed Public Access Point is mapped on a steep hillside in the southwest part of a 46+/- acre parcel adjacent to the Estero Americano (Figure 2 and Attachment B).

A private road along the east edge of APN 103-04-012 provides access to a few parcels to the east, the Sonoma Lant Trust (SLT) parcel containing the proposed Public Access Point, the eastern SLT parcel, and the adjacent parcel to the west (APN 103-04-031) (Figure 3). Access to the adjacent parcel to the northeast (APN 102-040-012) and SLT Parcel 103-04-014 is from Estero Lane, along the north side of the parcels.

The SLT owns three parcels along the north side of the Estero Americano encompassing 126.8 acres (APNs 103-04-010, 103-04-014, and 103-04-032) (Figure 2 and Attachment B). The SLT parcels primarily consist of steep hills sloping overall to the south toward the Estero Americano. The western two SLT parcels and adjacent parcels 103-04-012 and 103-04-031 comprise a topographic “amphitheater” facing the Estero Americano, with sweeping views of the Estero from numerous locations on each of the parcels. An intermittent creek with two headwater branches flows generally north to south through this four-parcel cluster, flowing in to the Estero Americano in the parcel to the west of the proposed Public Access Point. The easternmost SLT parcel (APN 103-04-010) faces southeast and drains in to the Estero Americano both directly, and via a creek further east.

The majority of the SLT parcels and adjacent lands are coastal prairie and chaparral habitats, with several notable rock outcrops (Figure 3 and photographs in Attachment C). There are also clusters of planted Monterey cypress (*Hesperocyparis macrocarpa*) trees and some widely scattered Monterey pines



Figure 3 Moore Biological Consultants	<div>0400800</div> <div>Map Date: 02/23/2022 Aerial Source: Maxar (11/2020)</div>	AERIAL
		Estero Americano - Potential Public Access Point K-2 Sonoma County, CA

(*Pinus radiata*) on most of the SLT parcels. Adjacent parcels, and parcels in the greater project vicinity, are primarily open space and rangeland, with widely scattered ranch style homes.

The Estero Americano bounds the south edge of two of the SLT parcels (Figure 3). A private gravel and dirt road provides access from Estero Lane to a few homes near Estero Lane, through the parcel containing the proposed Public Access Point, and in to an adjacent parcel. The south end of this road appears to terminate on a private parcel to the southwest of the proposed Public Access Point.

For approximately 2,000 feet south of Estero Lane, the private road is relatively flat and wide and appears well maintained. Further south, the road is steep and narrow as it winds down the hillside through the southwest SLT parcel toward the proposed Public Access Point. There are numerous water bars along the steep sections of the road to convey run-off from the roadway and reduce the potential for gullies and erosion of the roadbed and adjacent slopes.

The Estero Americano is a tidally influenced estuary, with the mouth of the Estero opening up to the Pacific Ocean during some years. There are expansive emergent wetlands and mudflats subject to tidal influence along the edge of the Estero Americano in the southwest SLT parcel near the proposed Public Access Point and on the parcel to the west (Figure 3 and photographs in Attachment C). Riparian wetlands dominated by willows (*Salix* spp.) bound the intermittent creek that flows in to the Estero Americano west of the proposed Public Access Point, especially along the western headwater branch.

Sonoma County Local Coastal Plan

Several “Environmentally Sensitive Habitat Areas” are mapped in the vicinity of proposed Public Access Point “K-2” in the draft SCLCP update maps (Attachment A) (Sonoma County, 2021). The Public Access Element of the draft

SCLCP update supports distributing recreational facilities where compatible with the sensitivity and suitability of an area. With respect to environmental sensibility, the draft SCLCP describes impacts on the environment, including determining the environmental carrying capacity of the land, protecting wildlife habitat, protection of views, and the “psychological and social” capacity of the land, as key factors in the evaluation of public access points. The draft SCLCP also discusses the need for park facilities (parking, restrooms, water, etc.) at public access points and encourages use of existing park service centers to support additional dispersed recreation. The Public Access Element draft SCLCP update describes the need to prevent overuse and damage to the coastal environment and that “substantial modifications of the natural environment for a specific activity” should be minimized and avoided if possible in planning recreational facilities.

Estero Americano Watershed Management Plan

The proposed Public Access Point is situated in the west part of the Estero Americano, which is described in the Estero Americano Watershed Management Plan (EAWMP) (GRRCD, 2007) as an environmentally sensitive watershed supporting numerous special-status plant, wildlife, and fish species that has been degraded over time by agriculture and other land use activities. Due to sedimentation, siltation, and nutrient pollution, the Estero Americano is listed as an impaired waterbody by the State Water Resources Control Board (SWRCB), which provided funding for the EAWMP.

The steep topography of the hillsides and the erosive qualities of many of the soils in the Estero Americano watershed facilitate erosion that has reduced the open water areas of the Estero over time. A substantial portion of the watershed is mapped in the EAWMP as having either a “high” or “moderately high” erosion hazard, with large gullies being some of largest contributors of sedimentation. Ten notable gullies in the watershed, including the steep bowl-shaped hillsides encompassing the two western SLT parcels, are identified in the EAWMP as

warranting field assessment as a potential “Priority Gully Restoration Site” for potential management activities that could mitigate soil erosion in the area.

Estero Americano State Marine Recreational Management Area

The western portion of the Estero Americano, including the portion adjacent to Public Access Point is within the boundaries of the Estero Americano State Marine Recreational Management Area (SMRMA), which was adopted by the California State Fish and Game Commission in 2010. Marine Managed Areas, such as the SMRMA, were set aside by the Commission primarily to protect or conserve marine life and associated habitats. The boundaries of the SMRMA are depicted in mapping of “Environmentally Sensitive Habitat Areas” in the public review draft SCLCP update (Sonoma County, 2021) (Attachment A).

Waters of the U.S. and Wetlands

The Estero Americano is a jurisdictional Water of the U.S. and includes wetlands as defined by the U.S. Army Corps of Engineers (ACOE, 1987). The Estero Americano is a navigable tidal water, and the wetlands along the edges of the Estero are “adjacent wetlands”, also falling under ACOE jurisdiction. The intermittent creek that flows in to the Estero Americano west of the proposed Public Access Point and riparian wetlands adjacent to the creek are also potentially jurisdictional Waters of the U.S.

In the vicinity of the proposed Public Access Point, the open waters of the Estero Americano are mapped as “Estuarine and Marine Deepwater” and “Riverine” features in the National Wetland Inventory (NWI) (Attachment D). The expansive mudflats and wetland habitats situated between the open waters of the Estero Americano and dry land near the proposed Public Access Point are mapped as “Freshwater Emergent Wetland” and “Freshwater Forested/Shrub Wetland” in the NWI. The creek that flows in to the Estero Americano just west of the proposed

Public Access Point is also mapped as a “Freshwater Forested/Shrub Wetland” in the NWI.

The downstream section of the tributary in to the Estero Americano and the mudflats and wetlands near the proposed Public Access Point are mapped as environmentally sensitive “Freshwater Herbaceous Wetlands” in the public review draft SCLCP update (Sonoma County, 2021) (Attachment A). The SCLCP Environmentally Sensitive Habitat Areas map also depicts patches of “Riparian Woodlands” further upstream along the tributary.

Eelgrass Beds

The open waters of the Estero Americano support California eelgrass (*Zostera marina*), which is considered a “keystone species” in north California estuarine environments upon which many other species, especially juvenile fish and invertebrates depend (SLT, 2016). In addition to its biotical functions and values, eelgrass beds are important in improving water quality through filtering polluted runoff, stabilizing sediments, and nutrient recycling. Eelgrass also functions in carbon sequestration and may offset carbon emissions (SLT, 2016; NOAA, 2014). Due to its importance to the marine ecosystem and the overall environment, the National Marine Fisheries Service (NMFS) “California Eelgrass Mitigation Policy” is the recommendation of no net loss of eelgrass habitat function in California (NOAA. 2014).

The Estero Americano is one of a limited number of estuarine habitats along the coast known to support California eelgrass. During surveys in 2010 and 2014, CDFW documented California eelgrass beds in the Estero Americano adjacent to the proposed Public Access Point (Figure 4). The eelgrass beds in the vicinity of proposed Public Access Point “K-2” are also mapped as one of the “Environmentally Sensitive Habitat Areas” in the draft SCLCP update maps (Attachment A) (Sonoma County, 2021).

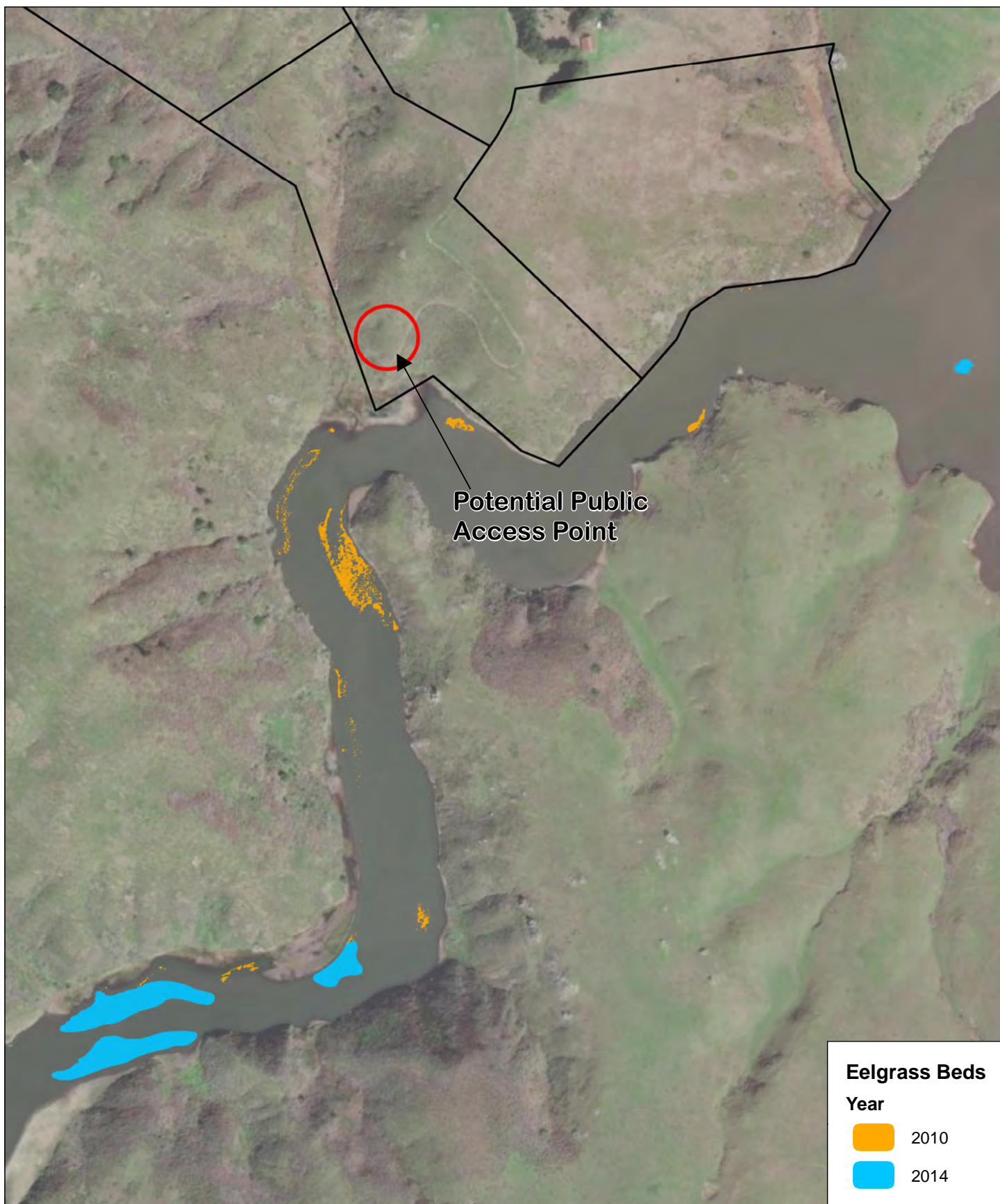


Figure 4

Moore Biological
Consultants

Map Date: 02/23/2022
Source Data: California Department of Fish and
Wildlife (CDFW); 2010 and 2014

Eelgrass Beds

**Estero Americano -
Potential Public Access Point K-2
Sonoma County, CA**

Resident and Migratory Birds

The expansive mudflats and emergent wetland habitats situated between the open waters of the Estero Americano and dry land near the proposed Public Access Point provide foraging and breeding habitat for a variety of shorebirds. The Estero Americano is identified in the Southern Pacific Shorebird Conservation Plan (SPSCP) (Hickey, et. al., 2003) as one of only two “wetlands of importance” for migratory shorebirds and waterfowl in Sonoma County, providing habitat to thousands of shorebirds during peak periods of occurrence. The Estero Americano is in the heart of the Pacific Flyway and supports a very large and diverse winter and migratory bird community. The SPSCP describes how growing recreational use of beaches, mudflats, and wetlands appears to be causing increased disturbance of roosting and foraging shorebirds. Erosion and sedimentation in wetlands are also identified in the SPSCP as a threat to shorebirds.

A variety of resident and migratory birds, including a few special-status species, use upland habitats in the Estero Americano Preserve. Point Reyes Bird Observatory (PRBO) Conservation Science (PRBO, 2012) conducted grassland bird monitoring at the Preserve in 2010 to 2011, with funding and support from SLT. A total of 44 species of birds was documented at nine point count stations during the 2011 breeding season, with grasshopper sparrow (*Ammodramus* *savannum*), which is special-status bird classified as a “Species of Concern” by CDFW, being the most abundant bird on the preserve. Other special-status birds observed in during study include northern harrier (*Circus hudsonius*) and Bryant’s savannah sparrow (*Passerculus sandwichensis alaudinus*). Breeding during the 2011 breeding season was confirmed for grasshopper sparrow, western scrubjay (*Aphelocoma californica*), and savannah sparrow (*Passerculus sandwichensis*). An additional 20 bird species are described in the study as “likely breeders”, while 15 more were considered as potentially breeding in the area. The study noted that low intensity seasonal grazing at the Estero Americano Preserve appears to promote grassland bird habitat.

Special-Status Species

The proposed Public Access Point is situated in and adjacent to habitats providing suitable habitat for several special-status plant, wildlife, and fish species. California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB, 2021) (Attachment D) contains records of 44 special-status species documented within the USGS 7.5-minute Bodega Head and Valley Ford topographic quadrangles, which is an area encompassing approximately 120+/- square miles surrounding the site. An additional 7 federally listed or candidate wildlife and plants species are identified in the United States Fish and Wildlife Service (USFWS) IPaC Trust Resource Report of Federally Threatened and Endangered species that may occur in or be affected by projects in the project vicinity (Attachment D).

The federally threatened Central Coast steelhead (*Oncorhynchus mykiss irideus*) has been documented in the Estero Americano in the immediate vicinity of the proposed Public Access Point and the Estero Americano is designated as critical habitat for Central Coast steelhead (Attachment E). The CNDDDB also contains a record of longfin smelt (*Spirinchus thaleichthys*), a State threatened and federal candidate species, in the Estero Americano just southwest of the proposed Public Access Point. Tidewater goby (*Eucyclogobius newberryi*), also a federally threatened species, has been documented in the Estero Americano just southeast of the proposed Public Access Point. Further, the Estero Americano is designated critical habitat for tidewater goby (USFWS, 2008) (Attachment E).

California red-legged frog (*Rana aurora draytonii*), a federally threatened species, has been documented in several locations within a few miles of the proposed Public Access Point and the Estero Americano and lands to the south are designated critical habitat for California red-legged frog (USFWS, 2006) (Attachment E). The creek that flows in to the Estero Americano just west of the proposed Public Access Point provides potentially suitable breeding habitat for

California red-legged frog and adjacent wetland and upland habitats may be used for frog movement and/or aestivation.

The CNDDDB (2021) contains 3 records of California red-legged frog that appear to be in very close proximity to the proposed Public Access Point, although the specific location information of these records is “suppressed”. Based on the location of the labels on the CNDDDB map (Attachment E), one of the 3 suppressed records appears to be on the north side of the Estero Americano, possibly on one of the SLT parcels. The remaining 2 suppressed records appear to be in the Estero Americano or on the north side of the Estero Americano just east of the proposed Public Access Point.

Four special-status plants are documented in the CNDDDB within approximately 0.5 miles west and southwest of the private parcel to the west of the proposed Public Access Point (Attachment E); there is also designated critical habitat for yellow larkspur (*Delphinium luteum*) less than one mile northwest of the proposed Public Access Point. Another patch of designated yellow larkspur critical habitat is located across the Estero Americano to the south (USFWS, 2002). Based on habitat types present, one of more special-status plant species may occur in habitats in or near the proposed Public Access Point.

The federally endangered Myrtle’s silverspot butterfly (*Speyeria zerene myrtleae*) is also documented in the CNDDDB along Estero Lane, just northwest of the proposed Public Access Point. This butterfly may occur in habitats in or near the proposed Public Access Point.

Proposed Public Access Point Activities

The proposed Public Access Point is expected to facilitate kayak traffic coming and going across the shore to the Public Access point. The proposed Public Access Point might be used as a launch or landing site, which would involve the transport of boats to the launch site, either overland across the private road or by

barge on the Estero Americano. As the private road appears to terminate on private property not owned by SLT, it is unclear where the vehicles would park and what route the kayakers would traverse to get to the water. Scrambling down the extremely steep hill from the proposed Public Access Point to the water would be treacherous, even without carrying a kayak. Absent development of a dock in the open waters (which would trigger the need from permits from several agencies), any kayakers launching or coming ashore at the proposed Public Access Point would need to wade through expansive mudflats and traverse sensitive wetland habitats situated between the open waters of the Estero Americano and dry land. It is anticipated large groups of kayakers may congregate at the proposed Public Access Point, for picnics or other gatherings that could generate noise impacting both wildlife and nearby residential parcels.



Source: Estero Americano Preserve website (SLT, 2022).

Potential Impacts to Biological Resource from Increased Public Access

There are numerous potential impacts to biological resources resulting from increased public access along the Estero Americano. Because it is a navigable waterway, the Estero Americano is already used to some degree by the public for boating and other recreation, but existing use should be limited to the open water

navigable areas. Unless kayakers or other boaters are coming ashore, which would involve trespass, the sensitive mudflats and emergent wetlands at and near the proposed Public Access Point are not subject to human trampling and the species that utilize these habitats are not subject to noise disturbance.

Encouraging and facilitating public access at the proposed Public Access Point could result in direct and indirect impacts to nesting birds, eelgrass beds, special-status fish species, California red-legged frog, and sensitive plants. Increased public access could also result in the degradation of critical habitat for California red-legged frog, tidewater goby, and Central Coast steelhead. Trampling the sensitive near shore mudflats and emergent wetlands would increase sedimentation of the Estero Americano and gatherings would generate noise and activity that could disrupt nesting birds and other wildlife, and also impact the quality of life of nearby residents. Increased traffic along the private road from Estero Lane could result in increased erosion along the road and associated sedimentation of the watershed, degradation of eelgrass beds, direct vehicle impacts to California red-legged frog (i.e., take), and indirect impacts to nesting birds. Development of parking areas, trails, restroom facilities, or other amenities at the proposed Public Access Point could also result indirect and indirect impacts to these same resources.

Biologically, the encouragement and facilitation of public access at the proposed Public Access Point is contrary to “preserving the coastal estuary, upland environments, and other sensitive resources” which are described as several of the primary objectives of SLT’s Estero Americano Preserve (SLT, 2022). The Estero Americano Preserve website describes the Estero Americano as “one of the most biologically dynamic areas along the entire Northern California coastline”. Coastal prairie management, vegetation monitoring, invasive plant control, road rehabilitation, and erosion control efforts to protect water quality along the Estero are described as focal “stewardship activities” at the preserve. Trampling the sensitive near shore mudflats and emergent wetlands, habitat degradation, erosion and sedimentation, potential direct impacts to California

red-legged frog, and noise disturbance to nesting birds don't align with preservation of sensitive biological resources at and near the proposed Public Access Point.

Conclusions

The proposed Public Access Point is in a remote and sensitive area and is inappropriate for public use. It is not accessible to the public via a public road there are no existing facilities such as parking areas, water, or restrooms for the public to use. Dedicated public access, or even development of recreational facilities on the steep hillsides, would likely involve substantial modifications of the natural environment, contrary to one of the key public access siting standards of the draft SCLCP update (Sonoma County, 2021). The proposed Public Access Point is a highly environmentally sensitive area that will only be adversely impacted by increased public access. The Estero Americano has suffered significant habitat degradation and truly deserves better stewardship.

Please call me at (209) 745-1159 with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Diane S. Moore', written in a cursive style.

Diane S. Moore, M.S.
Principal Biologist

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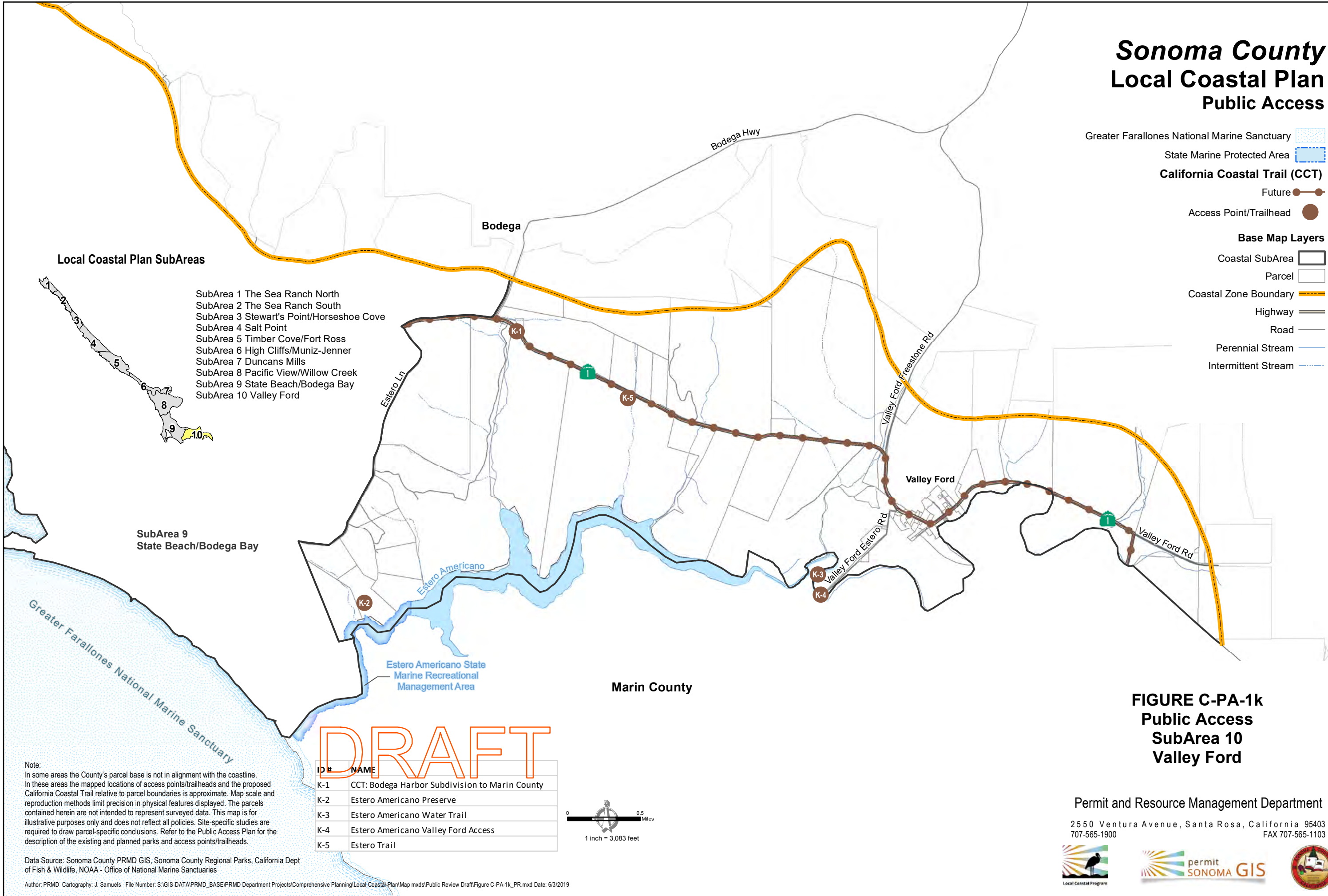
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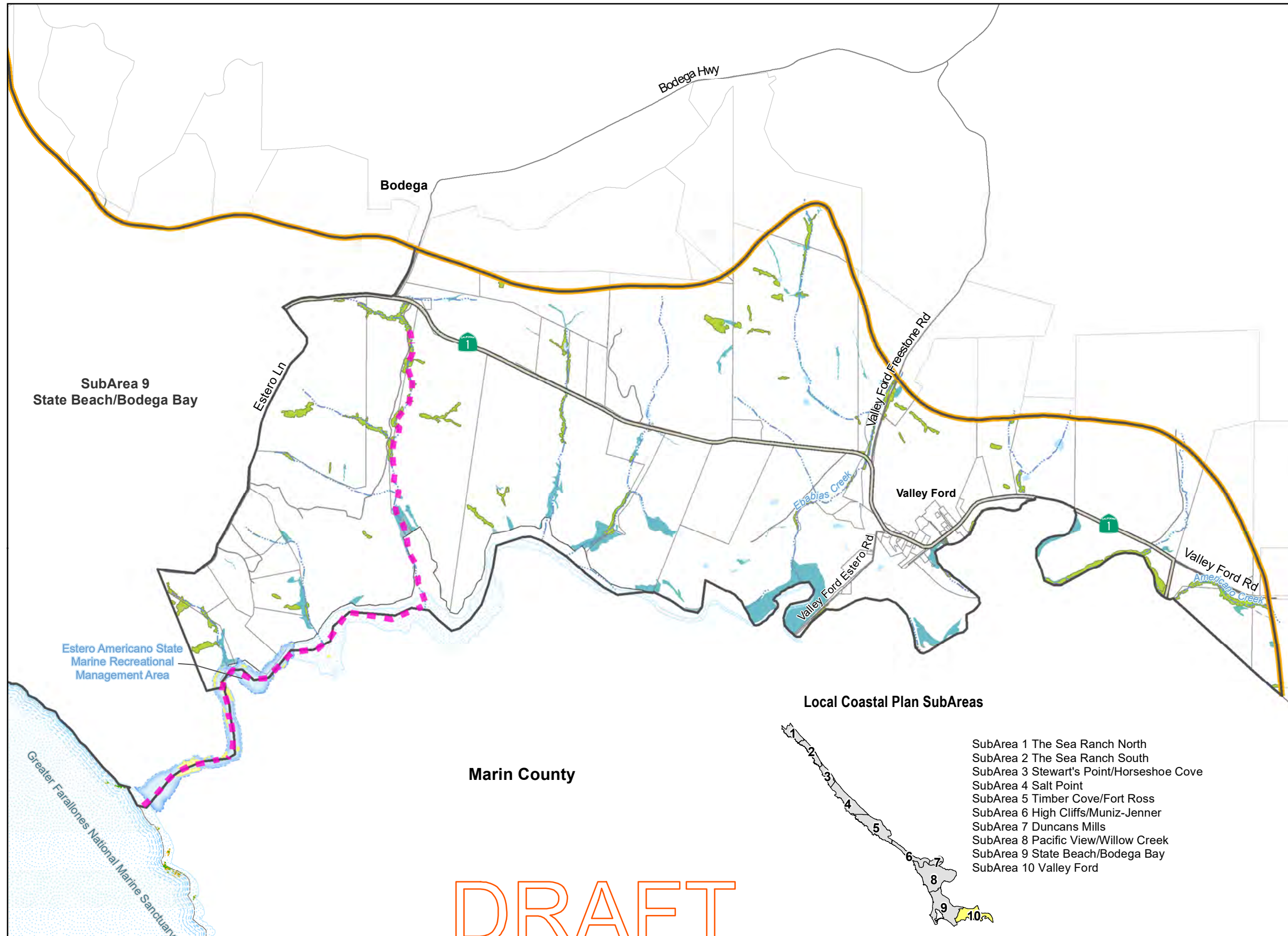
Attachment A

Sonoma County Local Coastal Plan (SCLCP) Public Review Draft Update Maps – Subarea 10 (Valley Ford)

Sonoma County Local Coastal Plan Public Access



Sonoma County Local Coastal Plan Environmentally Sensitive Habitat Areas (ESHA)



- Steelhead Trout
- Eelgrass Bed
- Freshwater Herbaceous Wetland
- Pond or Reservoir
- Tidal Salt Marsh
- Riparian Woodland
- Greater Farallones National Marine Sanctuary
- State Marine Protected Area
- Kelp Canopy
- Kelp Subsurface
- Riparian Corridor

Base Map Layers

- Coastal SubArea
- Parcel
- Coastal Zone Boundary
- Highway
- Road

Special Status Species Habitat Present in SubArea

- | Animals | Plants |
|-------------------------------|------------------------------------|
| American Badger | Baker's Goldfields |
| Burrowing Owl | Congested-headed Hayfield Tarplant |
| California Red-Legged Frog | Fragrant Fritillary |
| Great Egret | Golden Larkspur |
| Longfin Smelt | Point Reyes Checkerbloom |
| Myrtle's Silverspot Butterfly | Two-fork Clover |
| Tidewater Goby | |
| Tricolored Blackbird | |
| Western Pond Turtle | |

Local Coastal Plan SubAreas

- SubArea 1 The Sea Ranch North
- SubArea 2 The Sea Ranch South
- SubArea 3 Stewart's Point/Horseshoe Cove
- SubArea 4 Salt Point
- SubArea 5 Timber Cove/Fort Ross
- SubArea 6 High Cliffs/Muniz-Jenner
- SubArea 7 Duncans Mills
- SubArea 8 Pacific View/Willow Creek
- SubArea 9 State Beach/Bodega Bay
- SubArea 10 Valley Ford

FIGURE C-OSRC-2k
Environmentally Sensitive
Habitat Areas (ESHA)
SubArea 10
Valley Ford

DRAFT

Note:
Biotic resources shown on this map include only known habitat areas as of a certain date. There may be other biotic resources identified or found through field surveys and studies or reviews. Consultation with the California Natural Diversity Data Base and field surveys or studies may be necessary to determine potential biotic resources on a given site. The location of reported habitat and occurrences of special status plant and animal species are not shown on this map due to the non-specific nature of the data. For information on the reported habitat and occurrences of special status species in this SubArea, consult the California Natural Diversity Database.

Map scale and reproduction methods limit precision in physical features displayed. The parcels contained herein are not intended to represent surveyed data. In some areas the County's parcel base is not in alignment with the coastline. This map is for illustrative purposes only and does not reflect all policies. Site-specific studies are required to draw parcel-specific conclusions.

Data Source: Sonoma County PRMD GIS, Sonoma County Agricultural Preserve and Open Space District (SCAPOS), California Dept. of Fish & Wildlife Biogeographic Data Branch (BDB) - California Natural Diversity Database (CNDDB), The Resources Legacy Fund Foundation (contract), the Marine Protected Areas Monitoring Enterprise (coordination), Ocean Imaging (data collection and processing), The California Department of Fish and Game (database management), U.S. Dept of Agriculture, Forest Service, NOAA - Office of National Marine Sanctuaries



Permit and Resource Management Department

2550 Ventura Avenue, Santa Rosa, California 95403
707-565-1900 FAX 707-565-1103



Attachment B

Parcel Map

COUNTY ASSESSOR'S PARCEL MAP

TAX RATE AREA
96-013 96-014
96-035

103-04

1	N70°06'30"W	100.80
2	N85°02'00"W	268.60
3	S80°30'00"W	183.40
4	N84°49'00"W	127.00
5	N71°22'30"W	33.30
6	R=340.00	L=99.30
7	N54°38'30"W	55.86
8	N54°38'30"W	37.64
9	R=332.20	L=118.71
10	R=542.70	L=119.50
11	N21°33'00"W	62.30
12	R=142.50	L=84.46
13	R=76.40	L=57.16
14	N12°38'30"W	78.90
15	N20°53'00"W	173.50
16	N26°51'00"W	137.30
17	N21°50'00"W	114.20
18	N31°47'30"W	99.30
19	R=468.10	L=216.09
20	N05°20'30"W	111.10
21	N11°52'00"E	145.00
22	S86°13'40"W	173.12
23	R=220.00	L=236.52
24	R=280.00	L=268.63
25	R=220.00	L=211.84
26	R=280.00	L=46.30
27	N87°08'30"W	99.62
28	R=220.00	L=107.18
29	R=280.00	L=269.61
30	N87°08'30"W	454.61
31	R=220.00	L=211.06
32	R=280.00	L=301.03

For Details See
F.A.S. Plans
S-777-3

STATE HIGHWAY 1

200.75 Ac.
Ag Pre 2-257-71
2516/461

96-013
96-014

±223.16 Ac.
Ag Pre 2-257-82
82-009310

±2.07 Ac.
±12.68 Ac.
Ag Pre 2-257-82
82-009310

Ag Pre 2-257-82
82-009310

Note:
Portions rotated to align
with Adjoiners.
Deed Bearings are Magnetic
Variation 16°30'.

REVISED
12-28-77=26
04-28-81=30
05-11-89=32-LSL
02-06-98=C/E-RM
01-19-00=O/E-KT
05-16-02=14 O/E-LF
05-23-06=SBE-RL
10-24-12=34-BC
10-24-12=R/S-BC
04-02-15=R/S-BC

Assessor's Map Bk. 103, Pg. 04
Sonoma County, Calif. (ACAD)

KEY 10-22-12 BC
0 400 800 1600

SCALE: 1"=800'

Potential
Public Access
Point

Estero Americano

DETAIL
SCALE: 1"=200'

NOTE: This map was prepared for Assessment
purposes only and does not indicate either parcel
legality or a valid building site. No liability is
assumed for the accuracy of the data delineated.
The acreages are based on the information
supplied to the Assessor (i.e., recorded survey maps,
recorded deeds, prior assessment maps, etc.)

NOTE: Assessor's parcels do not necessarily
constitute legal lots. To verify legal parcel status,
check with the appropriate city or county
community development or planning division.

Attachment C

Photographs



View of the Estero Americano, looking southwest from the hillside north of the potential public access point; 10/06/21.



Dirt and gravel road providing access from Estero Lane to a few homes, the potential public access point, and a private parcel just west of the potential public access point, looking south; 10/06/21. Further south, the road steepens and winds down the hillside.



View of the Estero Americano, looking southwest from the potential public access point toward the sensitive wetland area along the edge of the Estero; 10/06/21.



Tributary to the Estero Americano, just southwest of the potential public access point, looking southwest; 10/06/21. This tributary meanders through emergent wetlands adjacent to the open waters of the Estero.



Tributary to the Estero Americano just west of the potential public access point, looking northeast; 10/06/21. The tributary has two forks further to the north, each of which flows through private parcels and Sonoma Land Trust parcels.



After a rainy weekend a few weeks later, the tributary was flowing; 10/25/21. This stream provides suitable breeding habitat for California red-legged frog and adjacent wetland and upland habitats may be used for frog movement and/or aestivation.



Potential public access point, looking southeast from near the south end of the dirt access road; 10/06/21. There is an expansive emergent wetland area between the open water of the Estero and dry land.



Open waters of the Estero Americano just west of the potential public access point, looking southwest; 10/06/21. This area supports eelgrass beds, a very sensitive and diminishing habitat that is important to numerous species.

Attachment D

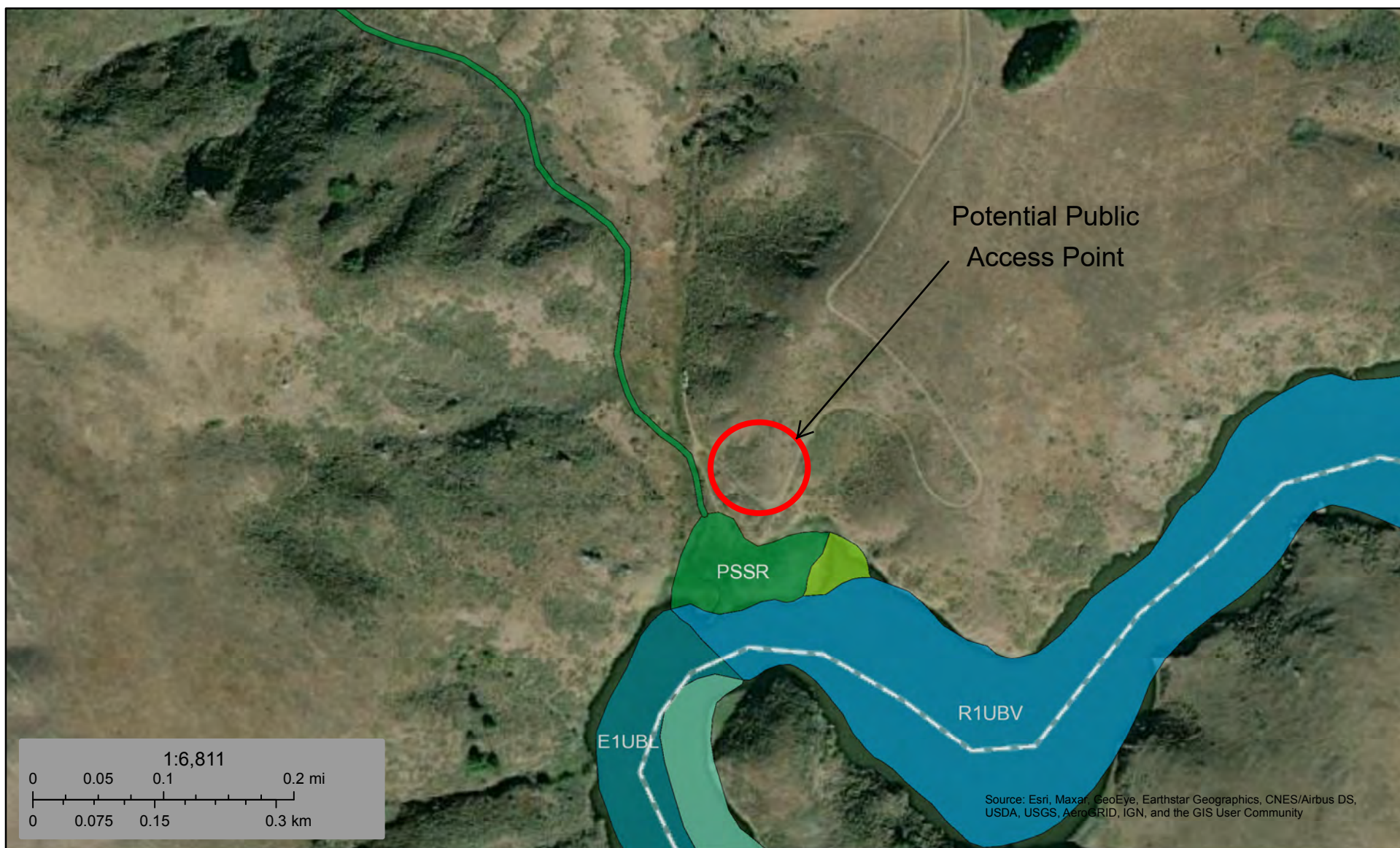
National Wetland Inventory



U.S. Fish and Wildlife Service

National Wetlands Inventory

Estero Americano



September 20, 2021

Wetlands

Estuarine and Marine Deepwater	Freshwater Emergent Wetland	Lake
Estuarine and Marine Wetland	Freshwater Forested/Shrub Wetland	Other
	Freshwater Pond	Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Attachment E

CNDDB Summary Report and Exhibits
& USFWS IPaC Trust Report



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad> IS <(Valley Ford (3812238))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G1G2	S1S2	SSC
<i>Agrostis blasdalei</i> Blasdale's bent grass	PMPOA04060	None	None	G2	S2	1B.2
<i>Anodonta californiensis</i> California floater	IMBIV04220	None	None	G3Q	S2?	
<i>Anodonta oregonensis</i> Oregon floater	IMBIV04110	None	None	G5Q	S2?	
<i>Arboreus pomo</i> Sonoma tree vole	AMAFF23030	None	None	G3	S3	SSC
<i>Ardea alba</i> great egret	ABNGA04040	None	None	G5	S4	
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	None	G4	S3	SSC
<i>Bombus caliginosus</i> obscure bumble bee	IIHYM24380	None	None	G4?	S1S2	
<i>Bombus occidentalis</i> western bumble bee	IIHYM24250	None	Candidate Endangered	G2G3	S1	
<i>Callophrys mossii marinensis</i> Marin elfin butterfly	IILEPE2207	None	None	G4T1	S1	
<i>Calystegia purpurata ssp. saxicola</i> coastal bluff morning-glory	PDCON040D2	None	None	G4T2T3	S2S3	1B.2
<i>Chorizanthe cuspidata var. villosa</i> woolly-headed spineflower	PDPGN04082	None	None	G2T2	S2	1B.2
<i>Cirsium andrewsii</i> Franciscan thistle	PDAST2E050	None	None	G3	S3	1B.2
<i>Coastal Brackish Marsh</i> Coastal Brackish Marsh	CTT52200CA	None	None	G2	S2.1	
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	ABNRB02022	Threatened	Endangered	G5T2T3	S1	
<i>Coelus globosus</i> globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
<i>Cypseloides niger</i> black swift	ABNUA01010	None	None	G4	S2	SSC
<i>Danaus plexippus pop. 1</i> monarch - California overwintering population	IILEPP2012	Candidate	None	G4T2T3	S2S3	
<i>Delphinium bakeri</i> Baker's larkspur	PDRAN0B050	Endangered	Endangered	G1	S1	1B.1
<i>Delphinium luteum</i> golden larkspur	PDRAN0B0Z0	Endangered	Rare	G1	S1	1B.1



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Dicamptodon ensatus</i> California giant salamander	AAAAH01020	None	None	G3	S2S3	SSC
<i>Dirca occidentalis</i> western leatherwood	PDTHY03010	None	None	G2	S2	1B.2
<i>Emys marmorata</i> western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
<i>Eucyclogobius newberryi</i> tidewater goby	AFCQN04010	Endangered	None	G3	S3	
<i>Fritillaria liliacea</i> fragrant fritillary	PMLIL0V0C0	None	None	G2	S2	1B.2
<i>Gilia capitata ssp. chamissonis</i> blue coast gilia	PDPLM040B3	None	None	G5T2	S2	1B.1
<i>Gilia capitata ssp. tomentosa</i> woolly-headed gilia	PDPLM040B9	None	None	G5T2	S2	1B.1
<i>Hemizonia congesta ssp. congesta</i> congested-headed hayfield tarplant	PDAST4R065	None	None	G5T2	S2	1B.2
<i>Hesperervax sparsiflora var. brevifolia</i> short-leaved evax	PDASTE5011	None	None	G4T3	S3	1B.2
<i>Horkelia marinensis</i> Point Reyes horkelia	PDROS0W0B0	None	None	G2	S2	1B.2
<i>Lasthenia californica ssp. bakeri</i> Baker's goldfields	PDAST5L0C4	None	None	G3T1	S1	1B.2
<i>Lasthenia californica ssp. macrantha</i> perennial goldfields	PDAST5L0C5	None	None	G3T2	S2	1B.2
<i>Lasthenia conjugens</i> Contra Costa goldfields	PDAST5L040	Endangered	None	G1	S1	1B.1
<i>Leptosiphon rosaceus</i> rose leptosiphon	PDPLM09180	None	None	G1	S1	1B.1
<i>Lichnanthe ursina</i> bumblebee scarab beetle	IICOL67020	None	None	G2	S2	
<i>Microseris paludosa</i> marsh microseris	PDAST6E0D0	None	None	G2	S2	1B.2
<i>Oncorhynchus kisutch pop. 4</i> coho salmon - central California coast ESU	AFCHA02034	Endangered	Endangered	G5T2T3Q	S2	
<i>Oncorhynchus mykiss irideus pop. 8</i> steelhead - central California coast DPS	AFCHA0209G	Threatened	None	G5T2T3Q	S2S3	
<i>Pelecanus occidentalis californicus</i> California brown pelican	ABNFC01021	Delisted	Delisted	G4T3T4	S3	FP
<i>Rana boylei</i> foothill yellow-legged frog	AAABH01050	None	Endangered	G3	S3	SSC
<i>Rana draytonii</i> California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC

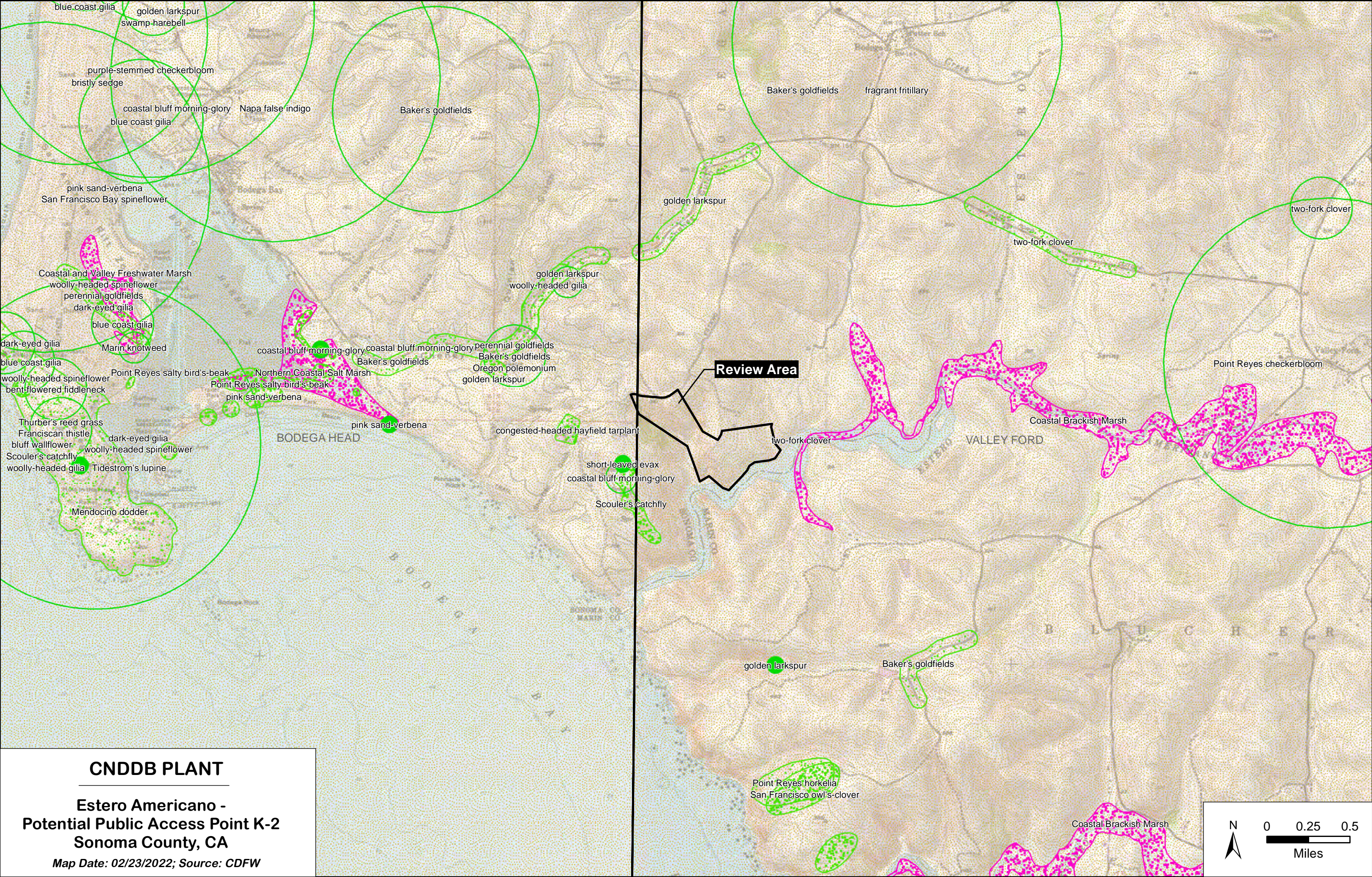


Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Sidalcea calycosa ssp. rhizomata</i> Point Reyes checkerbloom	PDMAL11012	None	None	G5T2	S2	1B.2
<i>Sidalcea malviflora ssp. purpurea</i> purple-stemmed checkerbloom	PDMAL110FL	None	None	G5T1	S1	1B.2
<i>Silene scouleri ssp. scouleri</i> Scouler's catchfly	PDCAR0U1MC	None	None	G5T4T5	S2S3	2B.2
<i>Speyeria zerene myrtleae</i> Myrtle's silverspot butterfly	IILEPJ608C	Endangered	None	G5T1	S1	
<i>Spirinchus thaleichthys</i> longfin smelt	AFCHB03010	Candidate	Threatened	G5	S1	
<i>Syncaris pacifica</i> California freshwater shrimp	ICMAL27010	Endangered	Endangered	G2	S2	
<i>Taxidea taxus</i> American badger	AMAJF04010	None	None	G5	S3	SSC
<i>Thamnomia vermicularis</i> whiteworm lichen	NLTES43860	None	None	G5	S1	2B.1
<i>Trifolium amoenum</i> two-fork clover	PDFAB40040	Endangered	None	G1	S1	1B.1
<i>Triphysaria floribunda</i> San Francisco owl's-clover	PDSCR2T010	None	None	G2?	S2?	1B.2
<i>Triquetrella californica</i> coastal triquetrella	NBMUS7S010	None	None	G2	S2	1B.2
<i>Vespericola marinensis</i> Marin hesperian	IMGASA4140	None	None	G2	S2	

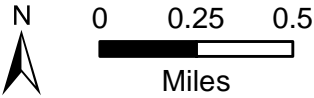
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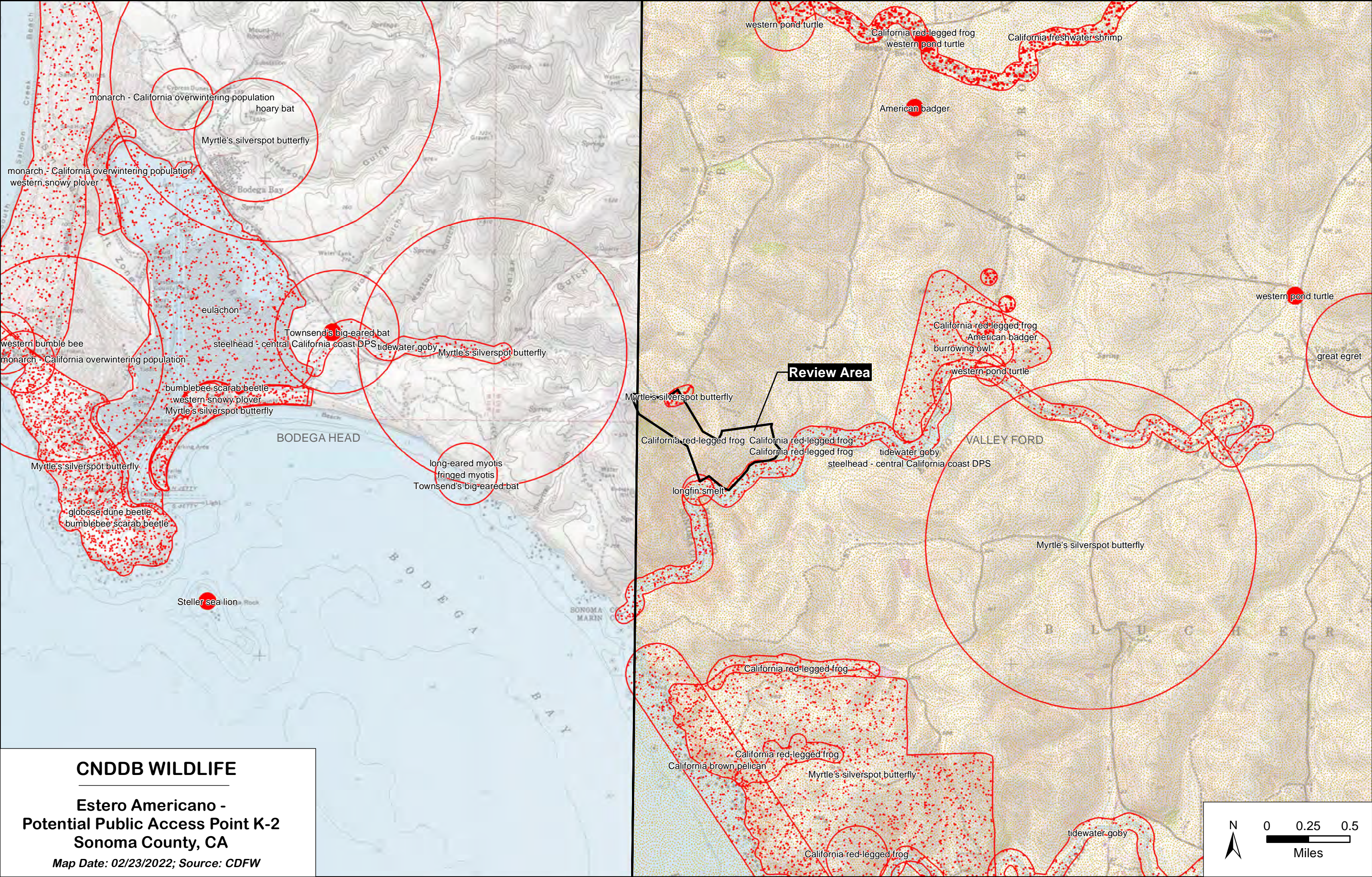


CNDDDB PLANT

**Estero Americano -
Potential Public Access Point K-2
Sonoma County, CA**

Map Date: 02/23/2022; Source: CDFW

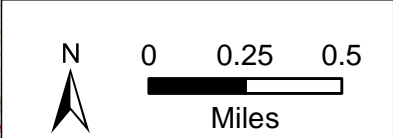




CNDDb WILDLIFE

Estero Americano - Potential Public Access Point K-2 Sonoma County, CA

Map Date: 02/23/2022; Source: CDFW



IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Marin and Sonoma counties, California



Local office

Sacramento Fish And Wildlife Office

☎ (916) 414-6600

📠 (916) 414-6713

Federal Building

2800 Cottage Way, Room W-2605

Sacramento, CA 95825-1846

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
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Marbled Murrelet *Brachyramphus marmoratus* Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/4467>

Northern Spotted Owl *Strix occidentalis caurina* Threatened

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/1123>

Short-tailed Albatross *Phoebastria (=Diomedea) albatrus* Endangered

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/433>

Western Snowy Plover *Charadrius nivosus nivosus* Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/8035>

Yellow-billed Cuckoo *Coccyzus americanus* Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/3911>

Reptiles

NAME

STATUS

Green Sea Turtle *Chelonia mydas* Threatened

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/6199>

Amphibians

NAME

STATUS

California Red-legged Frog *Rana draytonii* Threatened

Wherever found

There is **final** critical habitat for this species. Your location overlaps the critical habitat.

<http://ecos.fws.gov/ecp/species/2891>

Fishes

NAME

STATUS

Tidewater Goby *Eucyclogobius newberryi***Endangered**

Wherever found

There is **final** critical habitat for this species. Your location overlaps the critical habitat.

<http://ecos.fws.gov/ecp/species/57>

Insects

NAME

STATUS

Monarch Butterfly *Danaus plexippus***Candidate**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/9743>

Myrtle's Silverspot Butterfly *Speyeria zerene myrtleae***Endangered**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/6929>

Crustaceans

NAME

STATUS

California Freshwater Shrimp *Syncaris pacifica***Endangered**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/7903>

Flowering Plants

NAME

STATUS

Baker's Larkspur *Delphinium bakeri***Endangered**

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/5031>

Clover (tidestrom's) Lupine *Lupinus tidestromii***Endangered**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/4459>

Contra Costa Goldfields *Lasthenia conjugens***Endangered**

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/7058>

Showy Indian Clover *Trifolium amoenum***Endangered**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/6459>**Sonoma Sunshine** *Blennosperma bakeri***Endangered**

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/1260>**Yellow Larkspur** *Delphinium luteum***Endangered**

Wherever found

There is **final** critical habitat for this species. Your location overlaps the critical habitat.<http://ecos.fws.gov/ecp/species/3578>

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME	TYPE
California Red-legged Frog <i>Rana draytonii</i> http://ecos.fws.gov/ecp/species/2891#crithab	Final
Tidewater Goby <i>Eucyclogobius newberryi</i> http://ecos.fws.gov/ecp/species/57#crithab	Final
Yellow Larkspur <i>Delphinium luteum</i> http://ecos.fws.gov/ecp/species/3578#crithab	Final

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
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Allen's Hummingbird *Selasphorus sasin*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/9637>

Breeds Feb 1 to Jul 15

Bald Eagle *Haliaeetus leucocephalus*

Breeds Jan 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<http://ecos.fws.gov/ecp/species/1626>

Black Oystercatcher *Haematopus bachmani*

Breeds Apr 15 to Oct 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/9591>

Black Scoter *Melanitta nigra*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Black Storm-petrel *Oceanodroma melania*

Breeds May 15 to Nov 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Black Tern *Chlidonias niger*

Breeds May 15 to Aug 20

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/3093>

Black Turnstone *Arenaria melanocephala*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Black-footed Albatross *Phoebastria nigripes*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/8033>

Black-legged Kittiwake *Rissa tridactyla*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Black-vented Shearwater *Puffinus opisthomelas*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Brown Pelican *Pelecanus occidentalis*

Breeds Jan 15 to Sep 30

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

California Spotted Owl *Strix occidentalis occidentalis*

Breeds Mar 10 to Jun 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/7266>

California Thrasher *Toxostoma redivivum*

Breeds Jan 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Clark's Grebe *Aechmophorus clarkii*

Breeds Jun 1 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Common Loon *gavia immer*

Breeds Apr 15 to Oct 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<http://ecos.fws.gov/ecp/species/4464>

Common Murre *Uria aalge*

Breeds Apr 15 to Aug 15

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Common Yellowthroat *Geothlypis trichas sinuosa*

Breeds May 20 to Jul 31

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<http://ecos.fws.gov/ecp/species/2084>

Double-crested Cormorant *phalacrocorax auritus*

Breeds Apr 20 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<http://ecos.fws.gov/ecp/species/3478>

Golden Eagle *Aquila chrysaetos*

Breeds Jan 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<http://ecos.fws.gov/ecp/species/1680>

Long-eared Owl *asio otus*

Breeds Mar 1 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/3631>

Long-tailed Duck *Clangula hyemalis*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<http://ecos.fws.gov/ecp/species/7238>

Marbled Godwit *Limosa fedoa*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/9481>

Nuttall's Woodpecker *Picoides nuttallii*

Breeds Apr 1 to Jul 20

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<http://ecos.fws.gov/ecp/species/9410>

Oak Titmouse *Baeolophus inornatus*

Breeds Mar 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/9656>

Olive-sided Flycatcher *Contopus cooperi*

Breeds May 20 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/3914>

Pink-footed Shearwater *Puffinus creatopus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Pomarine Jaeger *Stercorarius pomarinus*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Red Phalarope *Phalaropus fulicarius*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Red-breasted Merganser *Mergus serrator*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Red-necked Phalarope *Phalaropus lobatus*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Red-throated Loon *Gavia stellata*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Ring-billed Gull *Larus delawarensis*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Short-billed Dowitcher *Limnodromus griseus*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/9480>

South Polar Skua *Stercorarius maccormicki*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Surf Scoter *Melanitta perspicillata*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Tricolored Blackbird *Agelaius tricolor*

Breeds Mar 15 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<http://ecos.fws.gov/ecp/species/3910>

White-winged Scoter *Melanitta fusca*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Willet *Tringa semipalmata*

Breeds elsewhere

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wilson's Storm-petrel *Oceanites oceanicus*

Breeds elsewhere

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Wrentit *Chamaea fasciata*

Breeds Mar 15 to Aug 10

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence

across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

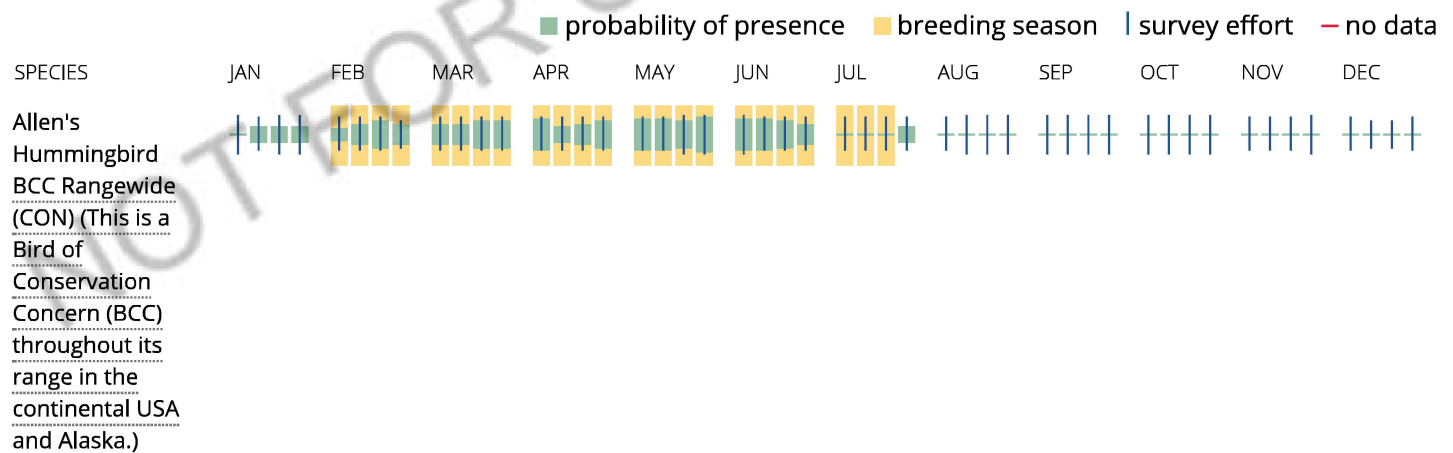
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

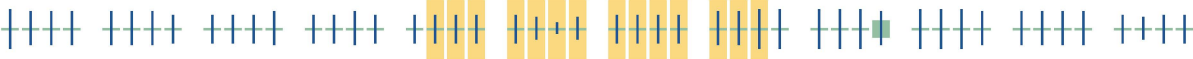
Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Black Tern
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Black Turnstone
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)

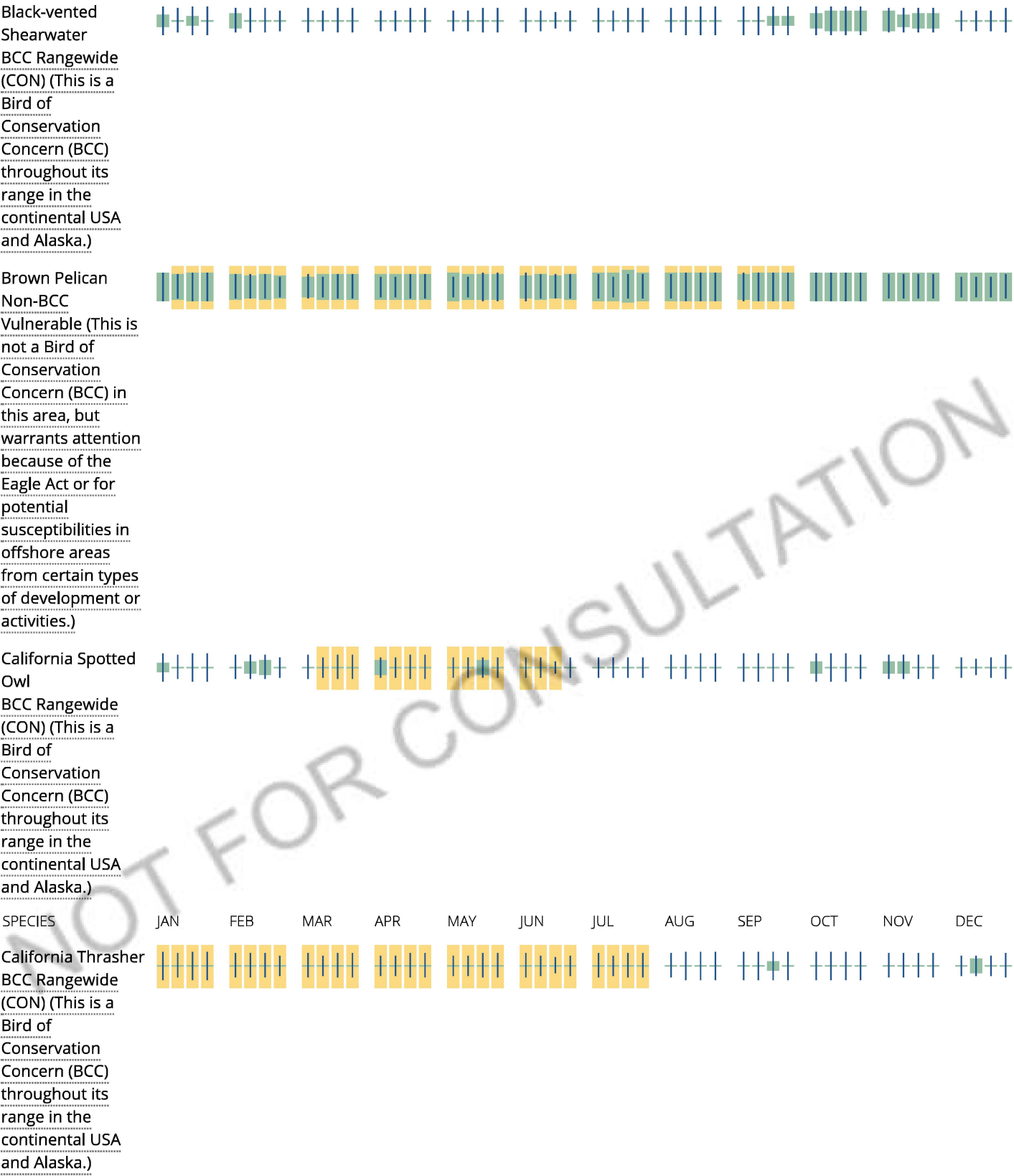


Black-footed
Albatross
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Black-legged
Kittiwake
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)





Clark's Grebe
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



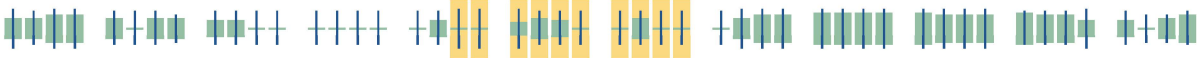
Common Loon
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



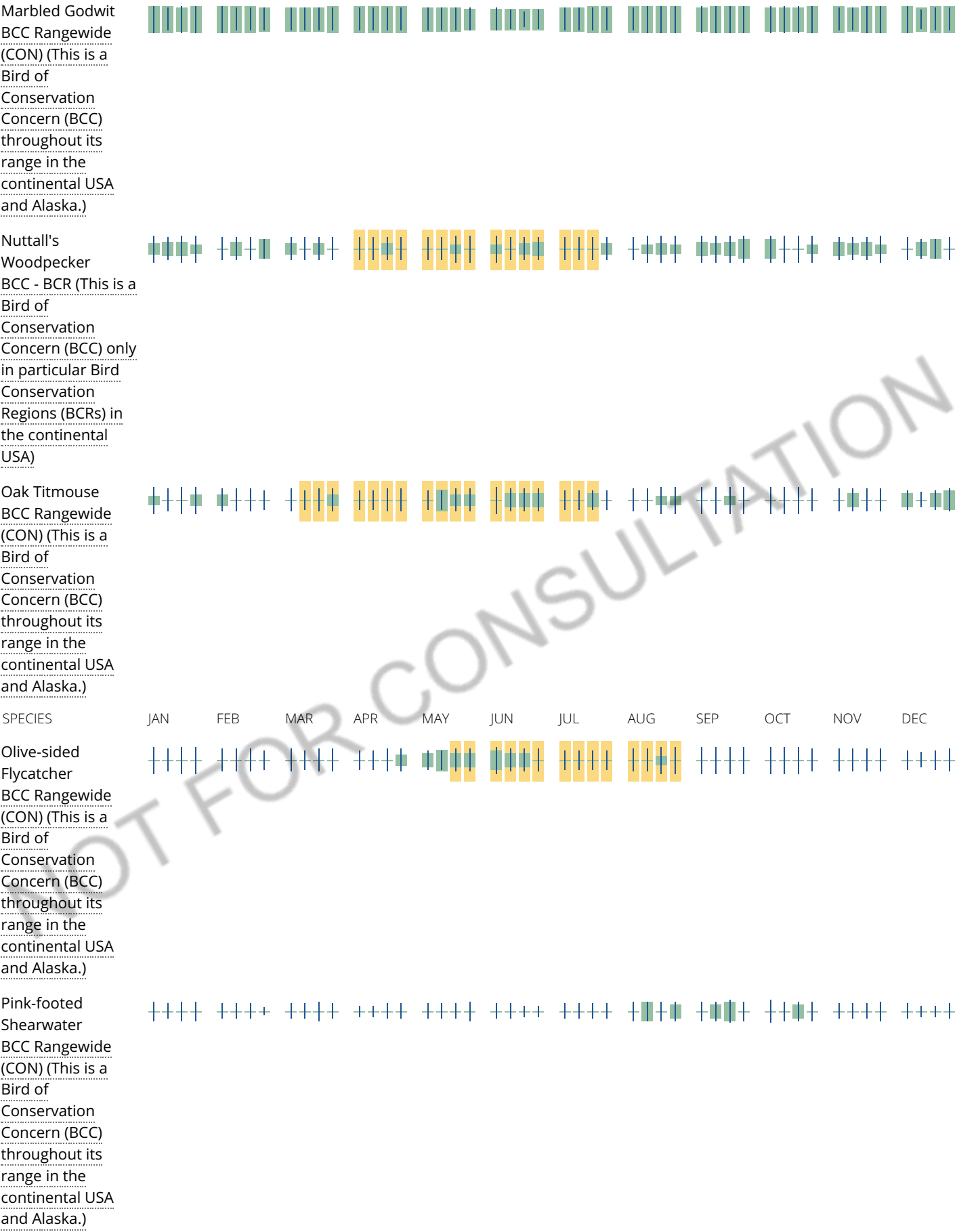
Common Murre
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



Common
Yellowthroat
BCC - BCR (This is a
Bird of
Conservation
Concern (BCC) only
in particular Bird
Conservation
Regions (BCRs) in
the continental
USA)



Double-crested Cormorant Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)	
Golden Eagle Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)	
Long-eared Owl BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)	
Long-tailed Duck Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)	



Pomarine Jaeger
Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Red Phalarope
Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Red-breasted Merganser
Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)



Red-necked Phalarope



Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Red-throated Loon



Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Ring-billed Gull



Non-BCC
Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)

Short-billed
Dowitcher
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



South Polar Skua
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



Surf Scoter
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



Tricolored
Blackbird
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



SPECIES JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC

White-winged
Scooter
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



Willet
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Wilson's Storm-
petrel
Non-BCC
Vulnerable (This is
not a Bird of
Conservation
Concern (BCC) in
this area, but
warrants attention
because of the
Eagle Act or for
potential
susceptibilities in
offshore areas
from certain types
of development or
activities.)



Wrentit
BCC Rangewide
(CON) (This is a
Bird of
Conservation
Concern (BCC)
throughout its
range in the
continental USA
and Alaska.)



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

Wildlife refuges and fish hatcheries

REFUGE AND FISH HATCHERY INFORMATION IS NOT AVAILABLE AT THIS TIME

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Attachment F

Designated Critical



Gary Helfrich
Planner III
County of Sonoma
2550 Ventura Avenue, Santa Rosa, CA 95403
Submitted via email to: gary.helfrich@sonoma-county.org

Re: Public Comment on Local Coastal Plan from Stewards of the Coast and Redwoods

Dear Mr. Helfrich,

Stewards of the Coast and Redwoods is a nonprofit that partners with the Russian River Sector of California State Parks to promote, restore, and protect the natural and cultural resources in our parks. The sector includes Armstrong Redwoods State Natural Reserve, Austin Creek State Recreation Area, and Sonoma Coast State Park. State Parks depend on Stewards to provide funding and support for the Volunteers in Parks Program, educational and interpretive activities, resource management and stewardship projects, and to assist in the development of interpretive facilities and displays.

Sonoma Coast State Park is located between Jenner and Bodega Bay on Highway 1. This 10,000+ acre park was established in 1934 and includes over 15 miles of trails. It is a series of beaches separated by rock bluffs and headlands extending 17 miles inland from Bodega Head to Vista Trail four miles north of Jenner. Features that make this State Park one of California's most scenic attractions include long sandy beaches below rugged headlands, a craggy coastline with natural rock arches, and secluded coves. Beachcombers, fishermen, sunbathers and picnickers can access the beach from more than a dozen points along the coast from Highway 1.

Stewards' Seal Watch volunteers rove the Goat Rock Beach seal rookery, located at the mouth of the Russian River. Volunteers assist in protecting the harbor seals during pupping season through interpretation by sharing information with Park visitors about the harbor seals' identification, natural history, and their protection under the Marine Mammal Protection Act. Beachgoers from near and far are able to view the animals from a safe distance with help of ropes, signs, and binoculars maintained by Seal Watch volunteers.

With significantly increased park visitation following the COVID-19 pandemic, public wildlife viewing is exceeding the capacity of volunteers and park staff to protect the Goat Rock Beach pinniped population. Thus, Stewards is submitting comments on several sections of the Local Coastal Plan revisions currently being drafted by Permit Sonoma and under consideration by the Planning Commissioners that pertain to Pinniped and Sea Bird protection. We cite paragraphs from the currently published draft. Our comments and recommendations for changes follow each citation:

Page OSRC-17-18, 5th Paragraph: “Stellar [sic] sea lions and other pinnipeds haul out on offshore intertidal areas that become exposed at low tides. Seals and sea lions use intertidal areas and sandy beaches, spits, and bars to haul out and rest. Harbor seals specifically use sandy beaches including the beaches at Sonoma Coast Sea Ranch, Jenner and Bodega Bay to rest, molt, give birth, and nurse their pups. California sea lions and northern elephant seals are occasionally observed at these harbor seal haul out locations.”

Comment: There is insufficient description of the importance of protection of haul-out areas, which even today are subject to human and dog intrusions, with inadequate State Parks staffing to monitor the sites.

Recommendation: Change to: "Harbor Seals, Steller sea lions, and other pinnipeds protected under the and the Marine Mammal Protection Act (MMPA), haul out on intertidal areas that become exposed at low tides as well as on offshore rocks. Harbor Seals, in addition to using offshore rocks along the Sonoma coast, specifically use sandy beaches at Sonoma coast locations at Sea Ranch, Goat Rock Beach in Jenner, and in the intertidal areas of Bodega Bay to rest, give birth, nurse their pups, and molt."

Page OSRC-25, Policy C-OSRC-5e(3) “Public access to Offshore Rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited. (EXISTING LCP REVISED: RECOMMENDATION 39 ON PAGE 31)

Page OSRC-26, Policy OSRC-5e(5): “Disturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation. Disturbance of areas used by harbor seals and sea lions shall be **avoided**. (EXISTING LCP REVISED)

Comment: The two above-cited policies are intended to protect biological resources (nesting birds on offshore rocks and marine mammals). But there is no mechanism specified for enforcement of the prohibitions against trespass on or disturbance/harassment of these sensitive habitats.

Recommendation: Consider a programmatic revise to the public access element of the LCP for county, state, and federal agencies, and local nonprofit partners to develop a coastal development permit through the California Coastal Commission for a seasonal closure of a portion of Goat Rock Beach to protect the harbor seals during pupping season. Currently, State Parks and Stewards of the Coast and Redwoods Seal Watch Volunteers erect ropes and signage as a “symbolic” closure which we seek to have formalized through this programmatic mechanism and supported through agency collaboration.

Page OSRC-26, Policy C-OSRC-5e(6): “Encourage the California Department of Fish and Wildlife to monitor Marine Mammal Haul-Out Grounds on an annual basis to determine their condition and level of use by marine mammals; and to incorporate this information into its management plan for marine mammals. (EXISTING LCP REVISED)”

Comment: Annual monitoring is not sufficient. Stewards currently monitors on a bi-weekly basis and monitoring should occur on a weekly basis during March-June pupping season and the August-September molting season.

Recommendation: Change to: "Collaborate with the California Department of Fish and Wildlife and Sonoma Water to monitor Marine Mammal Haul-Out Grounds on a bi-weekly basis and on a weekly basis during pupping season (March through June) and molting season (August through September), in order to determine their condition and level of use and to incorporate this information into its management plan for marine mammals."

Thank you for your consideration of these important issues. Protection of Sonoma Coast wildlife from human disturbance is critical to the beauty and value of the California coastal zone.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Lindenberg", written in a cursive style.

Justin Lindenberg
Executive Director