

# Huffman-Broadway Group, Inc.

ENVIRONMENTAL REGULATORY CONSULTANTS

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February 11, 2021

Sent Via Email

Eliseo Alexander Diaz Santana  
Los Pinos Apartments LLC  
alexdiame@icloud.com

**Subject: Response to CDFW Comments on Los Pinos Apartments, Mitigated Negative Declaration, SCH No. 2021010137, Sonoma County, California**

Dear Mr. Santana:

Huffman-Broadway Group, Inc. (HBG) has received and reviewed comments from California Department of Fish and Wildlife with respect to the Mitigated Negative Declaration (MND) for the Los Pinos Apartments in Sonoma County, California. We also reviewed the February 8, 2021 email delivered to you from Planner Katrina Braehmer of the Sonoma County Planning Division explaining how they will respond to most comments by incorporating specific information into the MND but requesting additional information from the applicant's consultant with respect to comments #2 and #3. This letter provides the requested information solely with respect to the comments regarding monarch butterflies (*Danaus plexippus plexippus*) and American badgers (*Taxidea taxa*).

**Comment #2:** CDFW indicates that the onsite habitat may be suitable for monarch butterfly, and suggests that the project, therefore, may result in injury or mortality to monarchs.

As mentioned in the comment, the monarch is designated as a California Terrestrial and Vernal Pool Invertebrate of Conservation Priority and has recently been advanced as a candidate species for listing under the federal Endangered Species Act. The larval host plant for monarchs is milkweeds, primarily milkweeds of the genus *Asclepias*. Darrin Weimeyer of Weimeyer Ecological Services prepared a Biological Assessment for the 2.5-acre property in 2019 in which he provided results of a general biological reconnaissance and wetland delineation, including an inventory of vegetation, and in which he also reported results of protocol rare plant surveys conducted on the site in 2019. Darrin Weimeyer conducted these site visits and protocol surveys on January 14, April 4, May 14, June 7, and June 27, 2019. The Plant Inventory List included as Appendix C of his 2019 Biological Assessment report contains no mention of milkweeds of the genus *Asclepias*. Darrin Weimeyer, working under Ted Winfield and Associates, conducted protocol rare plant surveys on April 2, April 26, and May 28, 2020 with no recorded observations of milkweeds.

Robert Perrera of HBG also contacted Darrin Weimeyer directly to inquire if he had observed milkweeds on the property and he responded in an email to Mr. Perrera on February 7, 2021 that he had found no milkweed plants on the property. Additional surveys of the property were conducted by Robert Perrera and Gary Deghi of HBG on August 20, 2019, and no milkweed plants were noted.

Milkweed plants, which serve as the larval host plant for monarch butterflies, do not occur on the subject property. No suitable habitat for monarch butterflies is found on the site, therefore, no potentially significant impacts to monarch butterflies would result from construction of the Los Pinos Apartments project.

**Comment #3:** CDFW comments that the grassland habitat found on the property may be suitable to support American badger, a California Species of Special Concern, which, according to as yet unpublished CNDDDB records, includes a sighting of American badger from a location approximately 1.6 miles from the site.

The CNDDDB indicates that suitable habitat for American badger includes the drier open stages of most shrub, forest, and herbaceous habitats. Suitable habitat for the species also requires friable soils and open, uncultivated ground. As pointed out by CDFW, the habitat on the Project Site may be potentially suitable to support an American badger. However, the fact that the site is located within an urbanized area along Santa Rosa Avenue reduces the possibility that American badger would use the site.

Biologists with Weimeyer Ecological Consulting and with HBG have made repeated visits to the site without encountering an American badger. Darrin Weimeyer conducted surveys of the property on January 14, April 4, May 14, June 7, and June 27, 2019, and again on April 2, April 26, and May 28, 2020. and Robert Perrera and Gary Deghi of HBG visited the site on August 20, 2019, and no American badgers were observed on any of these site visits. During the August 20, 2019 visit, HBG Wildlife biologist Gary Deghi searched the property for burrows of fossorial mammals, and specifically surveyed the property for burrows that would be suitable to support burrowing owl (*Atene cunicularia*) or American badger, and no burrows were found that would support either of these Species of Concern. The only mammal burrows observed were dens of Botta's pocket gopher (*Thomomys bottae*).

In their comment, CDFW points out that an American badger can create a burrow over the course of a day, therefore, even though presence of American badger on the site remains unlikely, the absence of suitable burrows for American badger in 2019 or 2020 does not mean that an American badger could not have occupied the site in the meantime. Therefore, it would be prudent to conduct a preconstruction survey for American badger and their burrows as recommended by CDFW.

If you have any questions regarding the above, please call me at 650-208-8711 or Robert Perrera at 415-385-4106.

Sincerely,

Gary Deghi  
Vice President/Senior Environmental Scientist

CC:  
Jean Kapolchok, jkapolchok@sonomacountylanduse.com  
Joseph Dorger, joe.dorger@outlook.com

## REFERENCES

California Department of Fish and Wildlife. 2020. Special Animals List For State of California produced by Biogeographic Data Branch, California Natural Diversity Database, California Department of Fish and Wildlife. List dated November 2020.

California Department of Fish and Wildlife. 2021. Natural Heritage Division, Natural Diversity Data Base for Santa Rosa Quadrangle Map and surrounding areas, February 2021.

Huffman-Broadway Group. 2021. *Email from Darren Wiemeyer to Robert Perrera confirming no milkweed plants were observed.* February 7, 2012.

Ted Winfield & Associates. 2020. *Special-Status Plant Report 2019 and 2020 Los Pinos Apartments 3496 Santa Rosa Avenue Santa Rosa, CA. Addendum To Biological Assessment Prepared By Wiemeyer Ecological Sciences August 2, 2019.* June 15, 2020

Wiemeyer Ecological Services. 2019. *Biological Assessment. Los Pinos Apartments, 3496 Santa Rosa Avenue, Santa Rosa, CA. Prepared for Eliseo Alexander Diaz Santana.* August 2, 2019.