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Nadin Sponamore
Sponamore Associates
2128 Contra Costa Avenue
Santa Rosa, CA 95402

RE: Rancho Laguna II

Dear Nadin:

I reviewed Mark Armstrong's discussion of the visual quality impacts at Rheem Boulevard (letter dated 2/5/2009), as well as the attached drawings and plans. This memorandum presents my assessment of the effects that the proposed plan modifications have on biological resources, as evaluated in the DEIR.

There are two distinct parts of the restored/revegetated Rheem Boulevard drainage: the upstream segment, which extends north of the "D" Drive crossing; and the downstream segment, which extends between the "D" Drive and "A" Way. The **upstream segment** could be regarded as more of a landscaping undertaking, as it screens the six home lots from Rheem Boulevard. The **downstream segment**, which does not separate homes from Rheem Boulevard, is more natural and is considered to have more habitat value for wildlife.

First and foremost, the modifications to the site plan to lessen the visual impacts would not result in additional biological impacts above and beyond those evaluated in the DEIR. As Mark points out, the revised plan would slightly reduce the total impacts to waters of the U.S./waters of the State. As summarized in Table 3.55-2 of the DEIR, the proposed project would impact 0.66 acre/2,042 linear feet of intermittent drainages, seasonal wetlands, freshwater marsh and seep habitats. Incorporation of the visual quality mitigation would result in total impacts of 0.5318 acre/1,768 linear feet of the same habitats. The realigned Rheem Blvd. drainage would have a total length of 1,986 linear feet, or a net increase of 218 linear feet. Mark mentions that mitigation for impacts to seasonal wetland and seep would most likely be on site, which is desirable from a resource and permitting standpoint. However, no details of the mitigation are provided.

The visual quality mitigations also modify the plan evaluated in the DEIR by removing the planting of taller riparian trees along the realigned Rheem Boulevard drainage. This is inconsistent with the approved biological mitigation measures presented in the DEIR. Specifically, mitigation measure 3.55 #4b, which states,

“The plans provide for the re-creation and enhancement of approximately 1,500 linear feet of surface channel, which will be revegetated with native species. In addition, the implementation of this plan shall result in the establishment of at least 1.3 acres of Central Coast riparian scrub habitat.”

and mitigation measure 3.55 #5b, which states,

“Potential impacts to a total of 55 mature native arroyo willow (1,024 cumulative inches) shall be mitigated through planting of a minimum of 201 container-grown arroyo willows in the designated open space preserve in the re-aligned Rheem Boulevard drainage corridor.”

The revised plan does not show the planting of any willows in either the upstream or downstream riparian areas.

The stated purpose for the revised planting scheme along the drainage course is to preserve views of the hillside from Rheem Boulevard. I question the need to restrict plantings to low shrubs along the downstream segment of the channel, as the channel bottom is about 20 below the roadway elevation. I recommend that the applicant’s restoration ecologist review the proposed planting plan with the engineer and the landscape architect to determine if taller vegetation can be used. Structural diversity of native plantings in the downstream segment would provide improved habitat values to native wildlife and would improve the overall plan from a biological perspective.

As identified under Impact 3.55 #5, Loss of Native Trees, 234 native trees are to be planted on site, comprised of coast live oak, valley oak, and buckeye, in addition to willows. The proposed landscape plan does not include buckeyes or coast live oak, as required under Mitigation Measure 3.55 #5a. The final landscape plan must be consistent with the measures outlined in the DEIR. It is understandable that the use of these plant species in the upstream segment is not feasible for reasons of views from Rheem Boulevard, since the ground elevations are so close to the roadway surface. However, because elevations of the downstream segment are well below the grade of the roadway surface, there seems to be no visual constraint to using taller trees there.

In reviewing the landscape plan (Rheem Boulevard Visual Quality Mitigation Exhibit, sheet PL 1.1), I have concerns regarding the prescribed plant materials in both the upstream and downstream segments. Three of the six species listed in the riparian transition palette are neither native to nor indigenous in the East Bay. These species should be substituted with

native species. While the grassland mix is comprised of native locally indigenous species, it does not include any native wildflower species. The riparian transition shrub palette includes two cultivars and one native species (leather oak) that does not occur in the East Bay; these should be substituted with native species (also note misspelling of Garrya). The riparian screen transition trees should be modified to meet the tree planting mitigation measure described above.

As stated above, it seems to be the intent of the applicant that the upstream segment plantings serve more of an ornamental and visual function and are not intended as habitat restoration, *per se*. However, the presence of the recreated wetland swale indicates that some habitat values are being assigned to this segment. For that reason, any plant species proximal to the swale should be locally indigenous and compatible with this habitat.

The landscape drawings seem to show three ponded areas in the wetland swale of the upstream segment. As stated in the DEIR (Mitigation Measure 3.55 #17a), the proposed revegetation of the re-aligned Rheem Boulevard drainage shall not include the construction of perennial ponds or any year-round water features to avoid attracting California red-legged frog. The applicant should explain the intent of these features and if seasonal ponding of short duration is proposed, the pond dimension, depths and contours should be reviewed by a qualified herpetologist to ensure that they would not be attractive to California red-legged frog.

In conclusion, the proposed visual mitigation measures would not result in additional impacts that have not been evaluated in the DEIR. However, the proposed changes in the riparian plantings do not appear to be consistent with the biological mitigation measures. the planting plan should be re-evaluated by a qualified restoration ecologist and modified to be consistent with the mitigation measures outlined in the DEIR. All plant species selected for areas specified as part of the restored/revegetated Rheem Boulevard drainage should be locally indigenous and compatible with the soil types and micro-climate of Rheem Valley.

Sincerely,

A handwritten signature in black ink that reads "Michael Wood". The signature is written in a cursive, flowing style.

Michael Wood