

**Saddle Mountain Open Space Preserve
Management Plan
Mitigated Negative Declaration
State Clearinghouse Number 2019059008**



Prepared for:

Sonoma County Agricultural Preservation and Open Space District
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Appendices

Appendix A. Mitigation Monitoring and Reporting Program for Saddle Mountain Preserve Management Plan MND

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Mitigated Negative Declaration
Sonoma County Agricultural Preservation and Open Space District
Saddle Mountain Preserve Management Plan Mitigated Negative Declaration

Project Title

Saddle Mountain Preserve Management Plan

Lead Agency Name and Address

Sonoma County Agricultural Preservation and Open Space District
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Project Location

Saddle Mountain Open Space Preserve (Preserve) is located in the central Mayacamas Mountains, in unincorporated Sonoma County, California, northeast of the city of Santa Rosa. The Preserve lies just north of the city limits of Santa Rosa and is located in the Mark West Creek and Santa Rosa Creek watersheds in the Russian River Hydrologic Unit. It lies at the intersection of four USGS 7.5' quadrangles: Mark West Springs in the northwest, Calistoga in the northeast, Santa Rosa in the southwest, and Kenwood in the southeast. The site is accessible from Cleland Ranch Road off Calistoga Road, St. Helena Road, and via an access easement on Plum Ranch Road. Erland Road, another private road, has also been identified as an access point.

Project Description

The Sonoma County Agricultural Preservation and Open Space District (Ag + Open Space) proposes to adopt the Saddle Mountain Preserve Management Plan (Management Plan) and to implement actions described in the Management Plan. The Management Plan was developed to guide preservation, protection, and enhancement of the Preserve's biological, ecological, cultural, historical resources, and aesthetic resources. The Management Plan is designed to enhance native habitats and protect sensitive biotic resources, protect cultural resources, reduce wildfire hazards, and provide opportunities for education, research, and limited visitation.

The Management Plan identifies and prioritizes the actions needed to achieve these goals. To achieve the management recommendations, Ag + Open Space intends to implement short- and long-term management actions along with avoidance measures needed to protect or enhance resources during implementation of those actions.

Findings

Impacts from implementation of the Management Plan would be mitigated to less-than-significant levels through implementation of mitigation measures and avoidance measures identified in the Initial Study. With implementation of these measures, no significant adverse effects to the environment are expected from the project. Implementation of the Management Plan would not have impacts which are individually limited but cumulatively considerable; nor would it have impacts that would cause substantial adverse effects, either directly or indirectly.

Initial Study and Comments

An Initial Study/Proposed Mitigated Negative Declaration was prepared and circulated to the State Clearinghouse and interested agencies on May 3, 2019, for a 30-day public review period. Ag + Open Space held a public meeting on May 6, 2019, to provide the public with an opportunity to comment on the Management Plan and the Initial Study. Ag + Open Space received three comment letters during the public review period. Ag + Open Space held an informational meeting on May 6, 2019 where several attendees asked questions and provided comments on the Management Plan and the IS/MND. The comments resulted in minor modifications to mitigation measures, but no new mitigation measures were required.

Protection Measures and Mitigation Measures

The following list of environmental protection measures (referred to as Project Measures) and mitigation measures have been added to the Project, have been agreed to by Ag + Open Space, and have been found to reduce potentially significant impacts from implementation of the Management Plan to less than significant. A Mitigation Monitoring and Reporting Program (MMRP) has been prepared and is available in Appendix A. The MMRP provides the complete text for each measure after responding to public comments.

Project Measures

The following Project Measures were developed to require a minimum level of impact avoidance and minimization for the implementation of all Management Plan activities. The Project Measures are mandatory and they are incorporated into all phases of planning, design, and implementation of Management Plan activities, as appropriate.

Project Measure 1 - Planting and Revegetation after Soil Disturbance for Restoration

Ag + Open Space, to the extent feasible, shall ensure plants disturbed by management actions be replaced with native plant species in accordance with the following measures:

- Implement soil protection measures, including seeding or planting promptly with appropriate native species and covering with weed-free straw mulch, and/or installing biodegradable erosion control fabric on slopes.
- Use seed or container stock of local origin for plantings. Seed or propagules for revegetation shall be collected from the Preserve itself if a viable source is present. Where this is not possible, propagules shall be from within the Russian River watershed, with exceptions being made only

after review by a qualified staff member or consultant. Within these geographic parameters, collections shall be made with the goal of capturing natural genetic variation (e.g., collect from a range of elevations and from plants exhibiting varied phenology).

- Native plant species historically present at the site shall be used and species with high wildlife and/or pollinator values will be used where feasible and appropriate.
- In limited instances, non-invasive, non-persistent grass species (e.g., sterile wheat) may be used in conjunction with native species to provide fast-establishing, temporary cover for erosion control.
- Soil amendments are typically not needed for establishment of native vegetation in intact native soils. If soils have been disturbed and require additional organic matter or nutrients to support native plants, limited organic, weed-free amendments may be used to help establish restoration vegetation. Organic fertilizers may be used only above the normal high water mark of any adjacent waterways. No chemical fertilizers shall be used.
- For management actions that have removed native vegetation, post-disturbance revegetation success will be based on individual site conditions and will generally be based on the following: 1) establishment of native trees and shrubs at a ratio of 1:2 living after five years (or the ratio mandated by regulatory permits if permits are needed), 2) establishment of herbaceous cover equal to that of adjacent undisturbed ground within three years, and 3) no increase in invasive species populations (or no greater cover of invasive species than that of adjacent undisturbed ground).
- If needed, a temporary irrigation system will be installed to ensure establishment of vegetation; when vegetation is sufficiently established, irrigation materials will be removed.

Project Measure 2 - Reduction of Construction Emissions

Ag + Open Space shall ensure that dust and other emissions are controlled during construction activities by implementing the following measures, as recommended by the BAAQMD (BAAQMD 2017b):

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day during the dry season.
- Haul trucks transporting soil, sand, and other loose material off-site will be covered.
- Visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Vehicle speeds on unpaved roads will be limited to 15 miles per hour.
- Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage for construction workers will be provided at all access points.
- Construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All construction equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- During construction activities, a publicly visible sign will be posted with Ag + Open Space and BAAQMD contact information regarding dust complaints. Ag + Open Space will respond and take corrective action within 48 hours of receiving a complaint.

Project Measure 3 - Erosion Control, Sediment Detention, and Site Maintenance

Ag + Open Space shall ensure erosion control, sediment detention, and site maintenance activities occur in accordance with the following measures:

- Ground disturbance will not exceed the minimum area necessary to complete the project or activity. Existing native vegetation will be preserved to the maximum extent feasible.
- All disturbed areas will be protected from erosion. Measures to stabilize disturbed soils will include, but not be limited to, placement of straw wattles, jute netting, silt fencing, and native reseeding. When a project involves grading or work within or adjacent to a stream, waterway, or other sensitive aquatic habitats, a spill prevention and clean-up plan, a Stormwater Pollution Prevention Plan, or similar document, will be prepared and implemented during construction activities to protect water quality. The plan will address polluted runoff and spill prevention policies, best management practices (BMPs) that are required to be available on site in case of rain or a spill (e.g., straw bales, silt fencing), clean-up and reporting procedures, and locations of refueling and minor maintenance areas.
- Debris, sediment, rubbish, vegetation, or other construction-related materials will be placed in an approved location. No materials, including petroleum products, chemicals, silt, fine soils, or substances deleterious to the function of a watercourse, water quality, or biological resources will be allowed to pass into, or be placed where it can pass into, stream channels.
- If rain occurs while materials are temporarily stockpiled, the stockpiles will be covered with plastic that is secured in place to ensure the piles are protected from rain and wind. Silt fencing or wattles will be installed on contour around all stockpile locations.
- Spoil materials from clearing, grubbing, grading, and channel excavation will be disposed of at a site approved by Ag + Open Space.
- Fire-suppression equipment will be reviewed and approved by Ag + Open Space or contracted staff before construction begins and will be available on site at all times.
- Areas that have received prescribed fire treatments will be evaluated and monitored for soil instability and erosion. Unacceptable levels of post-fire erosion, potentially as a result of greater-than-intended fire intensity, will be remediated through the implementation of control measures such as those described above.

Project Measure 4 - Pollution Prevention

Ag + Open Space shall employ BMPs for staging, maintenance, fueling, and spill containment of potentially hazardous materials used on the Preserve, including, but not limited to, the following:

- Vehicles and equipment will be inspected daily for leaks and repaired immediately if necessary.
- Fueling will take place away from watercourses and sensitive areas.
- Major vehicle and equipment maintenance and washing will be performed offsite.

- Spill cleanup materials will be maintained onsite during all activities that require the use of vehicles, equipment, or hazardous materials. Any spill will be cleaned up immediately.
- Spent fluids, such as motor oil and radiator coolant, and used vehicle or equipment batteries will be collected, stored, and recycled as hazardous waste offsite.

Project Measure 5 - Prevent Spread of Sudden Oak Death

Ag + Open Space shall be responsible for protecting against the spread of SOD through implementation of the following requirements:

- Before purchasing any nursery stock for restoration plantings, confirm that the nursery follows current BMPs for preventing the spread of SOD (consult the California Oak Mortality Task Force, www.suddenoakdeath.org, for current standards). All plant materials will be inspected for symptoms of SOD before bringing onto the Preserve.
- Train management staff on host species, symptoms, and disease transmission pathways for *Phytophthora ramorum* and other *Phytophthora* species, and on BMPs to prevent the spread of SOD, including:
 - Clean equipment after working in forest and woodland habitats, including chainsaws, boots, and truck tires (spray with a 10% bleach solution or other disinfectant, then rinse).
 - Work in forest and woodlands in the dry season instead of the wet season when spores are being produced and infections are starting. Avoid or minimize pruning oak, tanoak, and bays in wet weather.
 - Leave potentially infected downed trees on site instead of transporting the material to an uninfected area. Where infection is already known to be present, leaving *P. ramorum*-infected or killed trees on site has not been shown to increase the risk of infection to adjacent trees.
 - If necessary to reduce safety or fire hazards, infected trees can be cut, branches chipped, and wood split. Avoid working in wet weather. Clean equipment after work is completed. Do not leave cut wood and chips in an area where they might be transported to an uninfected location.
- Educate Preserve users about measures to prevent the spread of SOD. Provide signage at major trailheads explaining that SOD occurs on the Preserve, showing typical symptoms and explaining that it can be spread by Preserve visitors, especially in wet winters, during rainy and windy weather.

Project Measure 6 - Agency Coordination, Approvals, and Public Notification for Prescribed Fire

Ag + Open Space shall coordinate with CalFire, the BAAQMD, and the interested public during the planning and implementation of all prescribed fire projects. For each prescribed fire project, Ag + Open Space will work with qualified prescribed fire personnel to:

- Develop a site-specific burn plan that is approved by CalFire and conforms to the agency's specifications. The burn plan will include a description of the prescribed fire project area and burn

objectives, an analysis of site-specific environmental setting and any potentially affected resources, a burn prescription and predicted fire behavior, and contingency and medical plans.

- Develop a smoke management plan that is approved by the BAAQMD and conforms to the agency's specifications. The smoke management plan must include emissions estimates, wind and weather prescriptions, any necessary mitigations to reduce impacts from smoke, contingency procedures if the burn or smoke impacts exceed the original prescription, and public notification and complaint protocols.
- Conduct public outreach to solicit public input and to inform neighboring landowners and the interested public about potential prescribed fire projects and possible smoke impacts. Public outreach will occur throughout the burn planning process and public notification will take place prior to implementation of burns. Neighboring landowners and all sensitive receptors that may be impacted by smoke from a prescribed fire project shall be notified prior to burning.
- Develop a "Go/No Go Checklist" approved by CalFire and the BAAQMD that provides final confirmation of necessary conditions for implementing a prescribed fire project.

Additionally, Ag + Open Space will partner with qualified entities for the implementation of burns. All prescribed fire projects on the Preserve shall be implemented by CalFire or a qualified professional organization.

Project Measure 7 - Herbicide Use

Ag + Open Space shall ensure that herbicides are used in accordance with the manufacturers' recommendations. Consistent with the Board of Directors' approved resolution 2019-0975, herbicides will only be used to control invasive species and when other control measures are determined to be infeasible or less effective. Herbicides will be used only by applicators who hold a Qualified Applicator License or Certificate. Techniques such as spot application will be employed to ensure that only the minimum amount of herbicide necessary is used. Herbicides will not be used in areas where surface water bodies could be affected.

Project Measure 8 - General Measures to Avoid Impacts on Biological Resources

Ag + Open Space shall ensure the following biological resources protection measures are implemented on the Preserve:

- Perform preconstruction surveys prior to significant ground disturbance within all native habitats year-round. Surveys (on the day preceding work and/or ahead of the construction crew) will be performed by a qualified biologist to ensure no special-status species or common wildlife are occupying the area. If wildlife species are observed within the work area or immediate surroundings, these areas must be avoided until the animal(s) has (have) vacated the area, and/or, upon approval by the regulatory agencies, the animal(s) must be relocated out of the area by a qualified biologist.
- Conduct a training session for all construction crew personnel before any significant ground disturbance or building work, year-round. The training will be conducted by a qualified biologist and will include a discussion of the sensitive biological resources on the Preserve and the potential

presence of special-status species. This must include a discussion of special-status species' habitats, protection measures to ensure species are not impacted by project activities, project boundaries, and biological conditions outlined in the project permits, as applicable.

Project Measure 9 - Prevent the Spread of Invasive Species

Ag + Open Space shall prevent the spread of invasive plant species to the extent feasible. Weed control methods will include, but will not be limited to:

- Clean plant material and soil from the tires and undercarriage of vehicles and equipment (e.g., mowers) that have traveled through weed-infested areas before they leave those areas. Cleaning may be done with a hose if water is available and/or with a scrub brush or stiff broom.
- Train staff and Preserve volunteers to recognize invasive species and report new infestations promptly.

Project Measure 10 - Ensure Adequate Emergency Access

Ag + Open Space shall ensure that adequate access to the Preserve for emergency vehicles is maintained at all work sites, during all management activities including construction and prescribed burning.

Mitigation Measures

The mitigation measures have been developed to reduce potential significant impacts associated with implementation of Management Plan activities. Mitigations include specific actions needed to reduce impacts on plant and wildlife resources; riparian and wetland resources; and historic, cultural, paleontological, and tribal resources. Mitigation measures to reduce wildfire hazards and excess noise are also included. The mitigation measures presented here and in the MMRP incorporate all mitigation language changes resulting from public comments.

Mitigation Measure BIO-1, Avoid Loss of Special-status Plants and their Habitats

Ag + Open Space shall ensure that the following protection measures for special-status plants and their habitat are implemented during management activities. Where avoidance of individuals or habitat is infeasible, Ag + Open Space shall compensate for loss as required by CDFW and USFWS:

- Ag + Open Space shall conduct a botanical survey to ensure that no special-status plants are present in the area of potential ground disturbance prior to initiation of work. If special-status plants or their habitat are not identified during initial site surveys, no further mitigation for impacts on target species is necessary under this measure. Surveys shall be conducted at the appropriate time for plant identification, and shall be conducted by a botanist experienced with Sonoma County sensitive species.
- Ensure that special-status plants and their habitat are not damaged during road erosion control and drainage improvement activities. Napa false indigo is most likely to occur in these locations. Train crews to recognize this species prior to ground-disturbing activities, and have a trained supervisor oversee all work in areas where this plant occurs.

- Ensure that special-status plants and their habitat are not damaged by invasive species control efforts. Invasive species control is planned in or near locations supporting Lobb’s aquatic buttercup, Napa false indigo, and Clara Hunt’s milk vetch. Ensure that control efforts do not damage these plants, their seedbank, or habitat conditions. Prior to invasive control work, determine whether any known special-status occurrences are present within 100 feet. If so, a natural resource specialist or botanist shall plan and supervise the work.
- Ensure that special-status plants and their habitat are not damaged by fuels reduction, prescribed fire, or other vegetation thinning efforts. Fuels reduction is proposed along the Erland-Cleland Tie Road, along which Napa false indigo occurs. Prior to work, determine whether any known special-status plant occurrences are present within 100 feet. If so, a natural resource specialist or botanist shall plan and supervise the work (in conjunction with other specialists as needed).
- Ensure that Clara Hunt’s milk vetch populations are protected from impacts associated with Preserve access. Ag + Open Space shall install sensitive area flagging around the known population area to route Ag + Open Space staff, Preserve patrollers, and visitors around known population areas. The flagged areas may vary slightly from year to year based on the location of individual plants. Ag + Open Space shall educate Preserve patrollers and other visitors about the importance of avoiding impacts on individual plants in the flagged areas. Ag + Open Space shall continue to monitor the number of individuals annually.
- Any herbicide application to treat non-native plants must ensure that no special-status plants are affected.

Mitigation Measure BIO-2, Protect Special-status Plants during Prescribed Burning

Ag + Open Space shall ensure that the following protection measures for special-status plants are implemented prior to and during prescribed fire activities:

- Prior to conducting prescribed fire activities in habitat that supports special-status plant species, a qualified botanist or biologist shall survey the proposed burn area and identify any special-status plants or critical plant habitat that is present. If special-status species are present in the burn area, a botanist or qualified natural resource specialist shall work with professional fire personnel to plan and supervise the burn to protect special-status plants. Depending on the specific species’ characteristics and response to fire, a botanist shall determine if the special-status plant(s) may be negatively impacted by prescribed fire activities. If prescribed fire is determined to have a potentially negative impact on the special-status plant species, measures shall be implemented to protect the plant(s) including, but not limited to, the following:
 - The location of special-status plant(s) will be flagged or otherwise marked
 - An appropriate buffer will be established with environmentally sensitive area (ESA) fencing or other means to identify the sensitive area
 - Locations of special-status plants or habitat that should not be included in the prescribed fire shall be clearly marked on burn plans and in the burn unit

- Control lines or firebreaks shall be established at a sufficient distance to exclude fire from the area containing special-status plant species and their habitat
- Sensitive locations containing special-status plant species shall be monitored during prescribed fire activities to ensure that fire is excluded from the area and to implement remedial actions, such as fire suppression, as needed.

Mitigation Measure BIO-3, Protect Fish and Aquatic Wildlife Species

Ag + Open Space shall ensure that the following measures for aquatic species protection are implemented for ground-disturbing management activities near creeks and wetlands:

- A preconstruction survey for foothill yellow-legged frog shall occur prior to beginning work in any wetted stream channel (e.g., wet crossing treatments, culvert replacement), and work shall only occur in areas that have been surveyed by a qualified biologist. Frogs surveys would be restricted to the stream channels. Frogs shall be relocated outside of the work area by a qualified biologist, which may require consultation with CDFW and USFWS. Ongoing monitoring during construction shall occur to ensure frogs have not moved back into the area, and they are not being impacted by activities.
- A preconstruction survey for steelhead and other native fish shall occur prior to beginning work in any perennial stream channel (i.e., wet crossing treatments, culvert replacement), and work shall only occur in areas that have been surveyed by a qualified biologist. Dewatering activities may be needed if fish are present during construction. Ongoing monitoring during implementation of restoration activities shall occur to ensure fish are not being impacted.
- If water is present during construction of the any project, fish and other vertebrate aquatic species shall be relocated up- and/or downstream prior to construction, species shall be excluded from the work area, and the stream shall be dewatered. A comprehensive aquatic species relocation and dewatering plan shall be developed in consultation with CDFW, USFWS, and NOAA Fisheries during acquisition of ecological permits.
- A preconstruction survey for adult northwestern pond turtles and nest sites shall occur prior to beginning work for all projects within or near streams and other permanent water bodies. Any adults found within the work area shall be relocated to suitable off-site habitat. Nest sites discovered during the preconstruction survey or anytime during construction shall be avoided until vacated, as determined by a qualified biologist. Ongoing monitoring shall occur during construction to ensure no turtles have moved back into the area.

Mitigation Measure BIO-4, Protect Nesting Birds

Ag + Open Space shall ensure that the following protection measures for birds are implemented for ground-disturbing and/or vegetation management activities:

- Work shall occur outside of the critical breeding bird period (February 15 through August 31) for construction projects and during ongoing land management (e.g., vegetation trimming and removal, shaded fuel break development, etc.). If activities must occur during this period,

work areas shall be surveyed by a qualified biologist prior to commencing. Surveys shall be required for all human-related ground disturbance activities in natural habitats and for vegetation trimming and removal. The surveys shall be conducted within one week prior to initiation of vegetation clearing, tree removal and trimming, shaded fuel break development, and other vegetation activities. If the biologist finds no active nesting or breeding activity, work can proceed without restrictions. If active raptor or owl nests are identified within 100 feet of the construction area or active nests of other special-status birds (e.g., passerines, woodpeckers, hummingbirds, etc.) are identified within 50 feet of the construction area, a biologist shall determine whether or not construction activities may impact the active nest or disrupt reproductive behavior. If it is determined that construction would not affect an active nest or disrupt breeding behavior, construction can proceed without restrictions. The determination of disruption shall be based on the species' sensitivity to disturbance, which can vary among species; the level of noise or construction disturbance; and the line of sight between the nest and the disturbance. If the biologist determines activities would be detrimental, the nesting area and 250-foot buffer for larger nesting birds (e.g., owls, raptors, herons, egrets) and 50-foot buffer for small nesting songbirds shall be avoided until the nest has been vacated.

- If the work area is left unattended for more than one week following the initial surveys, additional surveys shall be completed. Ongoing construction monitoring shall occur to ensure no nesting activity is disturbed. If State and/or federally listed birds are found breeding within the area, activities shall be halted and consultation with the CDFW and USFWS shall occur.

Mitigation Measure BIO-5, Protect Northern Spotted Owl

Ag + Open Space shall ensure that the following protection measures for northern spotted owls are implemented for habitat disturbing management activities:

- Assume presence of northern spotted owl in Douglas fir, redwood, and mixed woodland habitats on the Preserve.
- Breeding northern spotted owls shall be protected in accordance with the measures outlined in ***Mitigation Measure BIO-4, Protect Nesting Birds***, above. Protection shall include focused breeding owl surveys for projects occurring from March 1 through August 31 in areas of suitable forested and woodland habitat and within 1 mile of a documented owl occurrence.
- If spotted owls are determined to be present during the breeding season within 0.5 miles of the work area, no work shall occur between March 1 and August 31 or until nesting completion has been verified by a qualified biologist.
- If the absence of northern spotted owl cannot be verified, the species shall be assumed to be present and either: 1) the work shall be performed after August 31 or 2) sound reduction measures shall be implemented in consultation with a qualified biologist, CDFW, and USFWS to ensure activities do not significantly raise noise above ambient levels.

- No trees or understory vegetation shall be removed within 500 feet of a documented active breeding location for northern spotted owl (either through previously confirmed sightings or project-specific verification by the project biologist).
- For projects proposed during the non-breeding season in suitable habitat, construction activities shall be overseen by a qualified biologist to ensure roosting and foraging birds are not being impacted.

Mitigation Measure BIO-6, Protect Special-status Bats

Ag + Open Space shall ensure that the following protection measures for bats are implemented during management activities on the Preserve:

- Complete presence/negative finding bat surveys prior to removal or significant trimming of any trees which are over 6 inches in diameter at breast height. Surveys shall be completed by a qualified biologist. Because each individual bat species may use different roosts seasonally and from night to day, surveys must be conducted by a qualified biologist at the appropriate times. If trees planned for trimming or removal are identified as active roost sites, appropriate and specific avoidance measures shall be developed. Avoidance measures may include, but would not be limited to, seasonal limitations on work when roosts are unoccupied and/or establishment of buffer areas around occupied roosts.
- For all trees previously identified as active roost sites and subject to trimming or removal, trees shall be taken down in a two-step process – limb removal on day one shall be followed by bole removal on day two. This approach would allow bats, if they are present, an opportunity to move out of the area prior to completing removal of the trees. No trees supporting special-status bats shall be removed without prior consultation with CDFW.
- If work is postponed or interrupted for more than two weeks from the date of the initial bat survey, the preconstruction survey shall be repeated.
- Construction shall be limited to daylight hours to avoid interference with the foraging abilities of bats.

Mitigation Measure BIO-7, Protect Wetlands and Waters

Ag + Open Space shall conduct a wetlands survey for areas that would be permanently or temporarily disturbed to confirm the location, extent, and regulatory status of wetland and water features within the management activity area. Project impacts on wetlands and waters shall be avoided where feasible. If jurisdictional wetlands cannot be avoided, the project may require a Clean Water Act (CWA) Section 404 permit from the U.S. Army Corps of Engineers and a Section 401 permit from the Regional Water Quality Control Board. All permit requirements shall be implemented.

In addition, compensation for impacts on wetlands and waters shall follow the requirements in the CWA Section 404/401 permits. Compensatory mitigation may consist of the following:

- Providing compensatory mitigation through aquatic resource restoration, establishment, enhancement, and/or preservation.
- Obtaining credits from a mitigation bank.

Mitigation Measure CUL-1, Identify and Avoid or Minimize Impacts on Historic Resources

Prior to ground-disturbing activities within 100 feet of a documented historic resource, Ag + Open Space shall examine the site to determine if the resource is within or outside the area of disturbance. If the historic resource is outside the area of disturbance or can be avoided, temporary fencing shall be placed around the historic resource and the project shall be designed and constructed to avoid impairment of the historic resource.

If the historic resource is determined to be within the area of disturbance and cannot be avoided, *The Secretary of the Interior’s Standards for the Treatment of Historic Properties* shall be followed. A qualified historic preservation professional shall be retained to develop a treatment plan. Such professionals may include architects, architectural historians, historians, historic engineers, archaeologists, and others who have experience in working with historic structures. Mitigation measures recommended by the qualified historic preservation professional shall be implemented. These measures could include, but not necessarily be limited to:

- Avoidance of significant historic resources;
- Graphic documentation (photographs, drawings, etc.); and/or
- Restoration, stabilization, repair, and reconstruction.

If subsurface historic materials are encountered during project activities, the piece of equipment or crew member that encountered the materials shall stop and the find shall be inspected by a qualified historian/archaeologist. Project personnel shall not collect historic materials. If the historian/archaeologist determines that the find qualifies as a unique historic resource for the purposes of CEQA (Guidelines Section 15064.5(c)), all work shall be stopped in the immediate vicinity to allow the archaeologist to evaluate the find and recommend appropriate treatment. Such treatment and resolution shall include either modifying the project to allow the materials to be left in place or undertaking data recovery of the materials in accordance with standard archaeological methods. The preferred treatment is protection and preservation.

Mitigation Measure CUL-2, Avoid Impacts on Previously Undiscovered Historic Resources

Ag + Open Space shall ensure that if previously unknown historic resources are encountered during construction, the piece of equipment or crew member that encountered the materials shall stop and the find shall be inspected by a qualified archaeologist. Project personnel shall not collect historic materials. If the archaeologist determines that the find potentially qualifies as a unique historic resource for the purposes of CEQA (Guidelines Section 15064.5(c)), all work shall be stopped in the immediate vicinity to allow the archaeologist to evaluate the find and recommend appropriate treatment. Such treatment and resolution shall include either project modification to

allow the materials to be left in place or undertaking data recovery of the materials in accordance with standard archaeological methods. The preferred treatment is protection and preservation

Mitigation Measure CUL-3, Minimize Impacts of Prescribed Fire on Cultural Resources

Ag + Open Space shall, prior to the implementation of prescribed fire activities, ensure that a qualified archaeologist surveys the proposed burn unit to identify any historic and archaeological resources present. A qualified archaeologist shall mark locations, and all fire and staging activities shall be excluded in marked areas. Prior to conducting a prescribed burn, wildland fire officials shall receive training on the location of cultural resources and measures necessary to protect them. Upon completion of burning activities, markings designating the location of cultural resources shall be removed.

Mitigation Measure CUL-4, Identify and Avoid or Minimize Impacts on Archaeological Resources

Ag + Open Space shall avoid known archaeological resources where feasible and follow the treatment recommendations presented in the cultural resources reports for the Preserve (Tom Origer & Associates 2008, 2018). All projects shall be designed, constructed, and operated to avoid damage to the resource as guided by the cultural resources treatment measures. Measures may include, but are not limited to, temporary protective barriers, construction worker training, or relocation of the project itself.

If avoidance of the location of a known archaeological resource is not feasible, a qualified archaeologist shall be retained to perform an evaluation of the resource and to determine its significance. The resource would be subject to archaeological research and testing in order to adequately document the site and its scientific data. Mitigation measures recommended by the qualified archaeologist shall be implemented and may include graphic documentation, avoidance of the resource, or accession of materials.

If previously unknown archaeological materials are encountered during construction, the piece of equipment or crew member that encountered the materials shall stop, and the find shall be inspected by a qualified archaeologist. Project personnel shall not collect archaeological materials. If the archaeologist determines that the find potentially qualifies as a unique archaeological resource for the purposes of CEQA (Guidelines Section 15064.5(c)), all work shall be stopped in the immediate vicinity to allow the archaeologist to evaluate the find and recommend appropriate treatment. Such treatment and resolution shall include either project modification to allow the materials to be left in place or undertaking data recovery of the materials in accordance with standard archaeological methods. The preferred treatment is protection and preservation.

Mitigation Measure CUL-5, Procedures for Encountering Human Remains

Ag + Open Space shall implement the following actions should human remains be encountered during project activities:

The treatment of any human remains and associated or unassociated funerary objects discovered during soil-disturbing activities shall comply with applicable State laws. If human graves are encountered, Ag + Open Space shall ensure that all work stops in the vicinity and the Sonoma County Coroner is notified. A qualified archaeologist shall evaluate the remains. If human remains are of Native American origin, the Coroner shall notify NAHC within 24 hours of identification, pursuant to PRC §5097.98. NAHC would appoint a Most Likely Descendant. A qualified archaeologist, Ag + Open Space, and the Most Likely Descendant shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects (CEQA Guidelines §15064.5[d]). The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters. If the Most Likely Descendant and the other parties cannot not agree on the reburial method, Ag + Open Space shall follow PRC §5097.98(b), which states that “the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.”

Mitigation Measure GEO-1, Avoid or Document Paleontological Resources

If a paleontological resource is discovered during construction, Ag + Open Space shall halt all ground-disturbing activities within 50 feet of the find. Ag + Open Space shall notify a qualified paleontologist who would document the discovery, evaluate the potential resource, and assess the nature and significance of the find. Based on scientific value or uniqueness, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the material. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices.

Mitigation Measure HAZ-1, Reduce Wildland Fire Hazards during Construction

Prior to construction activities, Ag + Open Space shall remove and clear away dry, combustible vegetation from the construction site with specific focus on the staging areas for heavy equipment. Grass and other vegetation less than 18 inches in height shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems can contact combustible materials. Fire extinguishers and fire suppression tools shall be available on the site when conducting construction activities.

Mitigation Measure NOI-1, Reduce Noise

Ag + Open Space shall ensure that noise reduction actions are implemented for all activities that use construction equipment within 200 feet of the Preserve boundary. Noise reduction measures may include the following:

- Equip internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and are appropriate for the equipment.

- Locate stationary noise-generating equipment as far as possible from sensitive receptors in the vicinity.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Provide signs at the Preserve entrance to inform users of the noise-producing activities, the location of the activities, and the duration.
- Inform residences in the areas near noise-generating actions to inform residents of the noise-producing activities, location of the activities, and the duration.
- Designate a "disturbance coordinator" responsible for responding to complaints about construction noise and taking reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator near management activities.

Mitigation Measure TCR-1, Consult with Native American Tribes if Previously Undiscovered Artifacts are Discovered

In the event that any Native American archaeological remains are discovered during implementation of management activities, Ag + Open Space shall contact and consult with local tribes who have a traditional and cultural affiliation with the Project area including Cloverdale Rancheria of Pomo Indians, Dry Creek Rancheria of Pomo Indians, Lytton Rancheria of California, and Mishewal-Wappo Tribe of Alexander Valley. If the tribe(s) considers the resource to be a tribal resource, the City shall consult with the tribe to develop appropriate mitigation measures in accordance with Public Resources Code 21080.3.2.

Mitigation Measure TCR-2, Identify and Avoid or Minimize Impacts on Tribal Cultural Resources

Ag + Open Space shall consult annually with representatives from interested tribes to relay information about the upcoming management activities and to allow for the tribes to provide information about the specific area. If the review identifies that a project may cause substantial adverse change to a tribal cultural resource, Ag + Open Space shall avoid or minimize adverse impacts in one of the following ways:

- 1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context.
- 2) Treatment of the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - a. Protecting the cultural character and integrity of the resource
 - b. Protecting the traditional use of the resource
 - c. Protecting the confidentiality of the resource

Response to Agency and Public Comments

Ag + Open Pace received three comment letters during the comment period. The comment letters are provided on the following pages. Comments have been assigned numbers for clarity and ease of reference. Ag + Open Space responses to the comments follow each letter. Revisions to the Draft Initial Study/Proposed MND in response to the comment letters are shown in ~~strikeout~~ and underline text.

From: David Schiltgen <david.schiltgen@gmail.com>
Sent: Thursday, May 16, 2019 4:02 PM
To: Monica Delmartini <Monica.Delmartini@sonoma-county.org>
Cc: slarson@ucanr.edu; emorris@srcity.org; mdahl@srcity.org
Subject: Saddle Mountain Management Plan - incorporation of grazing to reduce fire risks.

Monica,

1-1

I wasn't able to attend the May 6th meeting to discuss the Saddle Mountain Preserve Management Plan but I reviewed it on line (www.sonomaopenspace.org/saddle-plan) and was impressed with the thoroughness and thought behind it. However, I wanted to suggest that given its proximity to the Santa Rosa, and its location in a high fire risk area east of the City, that additional consideration be given to incorporating two fire prevention measures into the Management Plan, i.e. 1) a new or expanded water retention pond(s) which could serve as a water source during fire fighting and 2) controlled grazing at the preserve to reduce fine fire fuels and chaparral encroachment.

1-2

As you know the 960 Acre preserve northeast of Santa Rosa is designated by Calfire as "High" and "Very High" Fire Severity zone. The Draft plan does discuss fire hazards beginning on page 58 and indicates that controlled burns may be conducted on site. However, another useful tool for eliminating excessive fine fuels is grazing. The University of California

1-3

Cooperative Extension has a number of studies which assessed the reduced fire risks resulting from grazed lands. See a recent article by Dr. Stephanie Larson of the UCCE at: <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=29569> . The above referenced article by Dr Stephanie Larson indicates: "Cattle grazing primarily alters fuel conditions by reducing the amount of herbaceous fine fuels, whereas goat and sheep grazing can potentially also reduce the shrub component." Other UCCE reports discussing the use of grazing as a vegetation management tool include the following:

1-4

<https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=27269>
<http://www.plumas-sierra.ucanr.edu/?blogpost=29203&blogasset=36858>
<https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=5463>

1-5

In some cases, grazing can achieve similar effects of controlled burns on a more steady basis without the risk of the more infrequent and episodic controlled burns. I think fostering a resurgence of grazing would be a very valuable tool to keep in our fire risk reduction toolbox.

1-6

Though the parcel was grazed in the past, and Lisa Bush, a Certified Rangeland Manager, developed a Conceptual Grazing Plan for the Saddle Mountain Open Space Preserve, the Ag+Open Space District has determined that introducing grazing to the Preserve is not feasible at this time. This conclusion was reached despite acknowledging the following in the report:

"It is an observable fact that since intensive ranching ended at Saddle Mountain, more grassland acreage has become the thatchy host of coyote brush. Studies have documented the complete conversion of grassland to coyote brush-dominated coastal scrub in several locations in the bay area where grazing has ceased (Bartolomeetal.2007).

1-7 I think the grazing could be conducted on the Preserve in a manner that is consistent with the Sonoma County Agricultural Preservation and Open Space District's goals as it has easement on working forest and working agricultural lands elsewhere. As the recent fires so brutally demonstrated, the City of Santa Rosa is vulnerable all along its eastern flank from the adjacent high fire risk areas. If we want to reduce the chances that a fire would again march right into the City, we need defensible space and fire risk reduction plans in the fire prone hills which flank the eastern parts of the City.

1-8 Page 59 of the plan discusses past fire studies in the area and Fire Management Concepts, Inc. prepared a report entitled "Wildland Urban Interface Hazard Fuel Risk Assessment: City of Santa Rosa, California" as a first step in developing a comprehensive Community Wildfire Protection Plan. According to Fire Management Concepts, Inc. (2004), "The vegetation communities that surround Santa Rosa to the north, east and south are similar in fuel type classification to those that burned in the Oakland Hills. In addition, many areas surrounding Santa Rosa have fuel types and dead fuel loading that are even more hazardous than those present during the Oakland Hills Fire. The 1996 fire modeling conducted by Moritz found that the old stand of manzanita off St. Helena Road is "potentially explosive" and that (2) woodlands with an understory of brush or thickets of young Douglas-fir trees could burn with an intensity that could create crown fires and spotting; these conditions are particularly hazardous along roads that must be used for emergency access and evacuation. The study also noted that Sudden Oak Death on the Preserve will increase near-term fire hazard. The Saddle Mountain Management Plan goes on to state:

" In recent years, fire behavior on several regional wildfires has far exceeded modeled predictions, due in part to extremely low fuel moistures associated with drought and/or offshore wind events prior to the onset of the rainy season. It is worth noting that ...that wildfire hazards on the Preserve maybe more severe than predicted in the 1996 plan.

1-9 In addition to grading, I also want to suggest that a water impoundment be constructed or expanded on site. Water impoundments can become a biotic oasis in an otherwise dry landscape. The Mountains of eastern Sonoma County do not have many water impoundments and could dearly use more because these pools of nearby water can provide a critical source of water for firefighting during fire events. The closer the pool the more frequent and faster dip and dump cycles a helicopter can make fighting a fire. Having more than one water impoundment near a fire means multiple helicopters could dip and dump without the risk of crossing flight lines.

Thank you for considering my comments.

David Schiltgen


Response to Comment Letter 1: David Schiltgen

Response to Comment 1-1

The commenter reviewed the Management Plan and felt that it was thorough and thoughtful. The commenter suggests that additional consideration be given to incorporating two fire prevention measures into the Management Plan, given the Preserve's location in the wildland-urban interface in close proximity to the City of Santa Rosa. Ag + Open Space appreciates this feedback and agrees that the fire prevention is a critical management issue for the Preserve, particularly given its location in the wildland-urban interface in close proximity to the City of Santa Rosa. The commenter provides specific recommendations for incorporation fire prevention measures into the Management Plan, responses to which are provided below.

Response to Comment 1-2

The commenter suggests utilizing grazing as a management tool to eliminate excessive fine fuels on the Preserve. In the Management Plan, Ag + Open Space identified reducing fuel loads on the Preserve as an important management action. A conceptual grazing plan was prepared for the Preserve in 2008 to evaluate the feasibility of utilizing grazing as a management tool on the property. The conceptual grazing plan identified several major constraints to grazing on the property, including: the diffuse nature of the property's grassland patches, intergradation of vegetation types, steep topography, predation, site access, and lack of infrastructure and water sources. Additionally, the conceptual grazing plan noted that targeted grazing within the Preserve would require intensive management and oversight and could result in negative impacts to sensitive habitats. As a result, Ag + Open Space determined that cattle grazing is not a feasible management tool for the Preserve.

Due to the vegetation composition and steep topography of the Preserve, grazing with goats and sheep is more feasible than cattle grazing. Ag + Open Space will continue to evaluate the feasibility and efficacy of utilizing short-term, targeted goat and sheep grazing as potential tools for fuels reduction and vegetation management on the Preserve. However, predation, site access, lack of infrastructure and water, and other factors continue to pose significant constraints to goat and sheep grazing. As a result, goat and sheep grazing was not included in the Management Plan as a specific management action to be implemented on the Preserve.

Though Ag + Open Space has determined that cattle grazing is not feasible on the Preserve, Ag + Open Space agrees with the commenter that grazing can be a useful management tool for fire prevention and will further evaluate the use of custom sheep and goat grazing on the property. Custom grazing will also be evaluated and, if determined to be appropriate, incorporated into the Forest Management Plan for the Preserve.

In response to this comment, Ag + Open Space has revised page 5 in Section 1.6.2 of the Management Plan as follows:

Identified grazing challenges include the property's geographic position, rugged topography, intergrading vegetation types, and current paucity of grazing infrastructure (e.g. sound fencing

and water sources). Due to these challenges, Ag + Open Space has determined that introducing large-scale livestock grazing to the Preserve is not feasible at this time, although flash grazing with goats or sheep for vegetation and fuel management may be used as appropriate.

No changes in the IS/MND are required as a result of Ag + Open Space considering the use of sheep and goat grazing on the Preserve.

Response to Comment 1-3

The commenter provides an article by Dr. Stephanie Larson regarding a research project to identify the impacts of grazing on wildfire frequency and severity. Ag + Open Space has reviewed the article provided by the commenter and has added it to the administrative file for the Management Plan. The article notes that grazing can be an effective management technique for reducing fine fuel loading and wildfire risk. Though the article focuses primarily on cattle grazing, Ag + Open Space considered this information in its decision to continue evaluating the use of goat and sheep grazing as a potential management tool on the Preserve. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-4

The commenter provides three articles discussing the use of grazing to reduce wildfire threats in California. Ag + Open Space has reviewed the three resources provided by the commenter and has added them to the administrative file for the Management Plan. Though the articles primarily focus on cattle grazing, Ag + Open Space considered this information in its decision to continue evaluating the use of goat and sheep grazing as a potential management tool on the Preserve. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-5

The commenter suggests that grazing can achieve similar effects as controlled burns and can be implemented more regularly. The commenter thinks that grazing could be a valuable tool in Ag + Open Space's fire reduction toolbox. Ag + Open Space recognizes that grazing is a valuable tool for reducing ground fuels and that managed grazing can, in general, be implemented more regularly than prescribed fire projects. However, as is described in the response to Comment 1-2 above, Ag + Open Space found that the use of cattle grazing as a management tool was not feasible on the Preserve due to a variety of factors, including topography and lack of infrastructure. The Forest Management Plan that will be developed for the Preserve will further evaluate the potential for targeted goat or sheep grazing for fuel reduction and vegetation management on the Preserve. Ag + Open Space will continue to evaluate the efficacy and feasibility of goat and sheep grazing as management tools for reducing fire hazards and promoting natural resource management on the Preserve.

Additionally, Ag + Open Space will utilize a variety of management techniques to reduce fuel hazards on the Preserve, as described in the Management Plan. In addition to prescribed fire, Ag + Open Space intends to manage fuel loads on the Preserve through mechanical techniques and create shaded fuel breaks along strategic corridors throughout the property. Mechanical vegetation management will also be used to address shrub encroachment into grasslands and to address overstocked forest stands. As such,

Ag + Open Space intends to utilize a variety of tools and techniques to reduce the risk of fire on the Preserve. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-6

The commenter notes that the property was grazed in the past and that a Conceptual Grazing Plan was developed for the Preserve. Nothing that thatch encroachment into grassland has occurred since the cessation of grazing on the property, the commenter questions why Ag + Open Space has determined that reintroducing grazing to the Preserve. Though the Saddle Mountain area was historically used as a livestock ranch, subsequent land divisions have eliminated water sources and reduced site accessibility and much of the grazing infrastructure, including fencing, has deteriorated significantly over time. The Conceptual Grazing Plan that was developed for the Preserve identified several major constraints to grazing on the property, as described in the response to Comment 1-2. In light of these constraints, Ag + Open Space determined that cattle grazing is not a feasible management tool for the Preserve.

As the commenter notes, cessation of grazing has led to the encroachment of coyote brush into grassland areas on the Preserve. Because cattle grazing is no longer feasible on the area, the Management Plan proposes a variety of management techniques, including prescribed fire and mechanical vegetation management, to reduce coyote brush encroachment and maintain the open character of grasslands on the Preserve.

Targeted, short-term sheep and goat grazing could reduce thatch encroachment and fuel loading on the Preserve, if such management techniques could be feasibly implemented given the constraints on the site. As described above, Ag + Open Space will continue to evaluate the feasibility of utilizing sheep and goat grazing as a potential management tool on the Preserve. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-7

The commenter suggests that grazing is consistent with the overall organizational mandate for Ag + Open Space and that it is important to create defensible spaces and reduce fire risks east of Santa Rosa. Ag + Open Space agrees that grazing is a management tool that is consistent with its overall goals and mission, and Ag + Open Space utilizes grazing on many of its lands throughout Sonoma County. However, as described above and detailed in the Conceptual Grazing Plan, a variety of site-specific constraints render the use of cattle grazing on the Preserve infeasible. Pending further evaluation by Ag + Open Space, sheep and goat grazing may be utilized on the Preserve as a management tool in the future.

Ag + Open Space fully agrees with the commenter regarding the need for fire risk reduction and the creation of defensible spaces on the Preserve specifically and in the wildland-urban interface east of Santa Rosa more generally. Reducing the risk of wildfire is a core component of the Management Plan and a variety of management actions are proposed to decrease fire risk and reduce fuel loads on the Preserve. These management actions include prescribed burning, mechanical vegetation management, targeted thinning, shaded fuel break development, and invasive species control. Ag + Open Space will coordinate

closely with CalFire to develop and implement prescribed fire and shaded fuel break projects on the Preserve that will tie in to larger, regional efforts by Cal Fire to reduce fuel loads northeast of Santa Rosa, and a Forest Management Plan or similar document will be prepared to further guide stand management, targeted thinning, and fuels reduction projects. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-8

The commenter points out that the Management Plan acknowledges that fuel loads are high on the Preserve and that Sudden Oak Death (SOD) can exacerbate fire risk. Ag + Open Space agrees that the fire hazards and fuel loads are high on the Preserve and ameliorating this issue is a critical component of the Management Plan. Proposed management actions that are intended to reduce fire risk on the Preserve include prescribed fire, mechanical vegetation management to reduce ladder fuels and prevent thatch encroachment, creation of shaded fuel breaks, select Douglas fir and forest thinning, and development of a Forest Management Plan or similar document. Ag + Open Space also recognizes that SOD presents a range of natural resource concerns and can lead to the accumulation of excessive ground and ladder fuels. Management activities intended to prevent the spread of SOD are outlined on pages 47-48 of the Draft IS-MND and include training and education and developing appropriate stand management prescriptions for forested areas susceptible to SOD. The management activities proposed in the Management Plan are designed to reduce fire hazards across the Preserve generally and to address SOD and its attendant fire risk specifically. No changes to the Management Plan or IS/MND are necessary to address this comment.

Response to Comment 1-9

The commenter suggests that Ag + Open Space construct or expand water impoundments on the Preserve. Ag + Open Space has determined that it is not feasible to construct or expand any water impoundments on the Preserve. Construction of a water impoundment on the area would result in significant impacts to natural resources and is incompatible with Ag + Open Space's overarching goals for management of the Preserve. The existing pond and vernal pool on the Preserve are in close proximity to a historic resource and provide sensitive habitat for a variety of plant and animal species, including one rare plant (Lobb's aquatic buttercup) and a California species of special concern (western pond turtle). Expansion of this vernal pool would require significant disturbance to sensitive cultural and natural resources and is therefore infeasible.

However, there are several water sources in the immediate vicinity, including two large impoundments located on properties immediately adjacent to the Preserve. Given the presence of nearby water source that could be utilized by firefighters in emergency situations, Ag + Open Space has determined that constructing an impoundment on the Preserve would have limited benefit and would substantially impact sensitive environmental resources on the property. No changes to the Management Plan or IS/MND are necessary to address this comment.

Comments from Jeb Bjerke, Senior Environmental Scientist Specialist, Native Plant Program, California Department of Fish and Wildlife on the draft Saddle Mountain Open Space Preserve Management Plan and the corresponding initial study/mitigated negative declaration.

May 5, 2019

2-1

I conducted a brief review of the draft Saddle Mountain Open Space Preserve Management Plan (management plan) and the corresponding initial study/mitigated negative declaration (IS/MND). My comments primarily relate to Clara Hunt's milkvetch (*Astragalus claranus*), a plant species that is listed as threatened under the California Endangered Species Act (CESA). Clara Hunt's milkvetch may be the most at-risk plant species that is currently present on the Saddle Mountain Open Space Preserve (Preserve).

Overall, I found the management plan and corresponding IS/MND for the Preserve to be well-prepared, and I am pleased with the overall purpose of the acquisition: to "conserve and protect the natural, scenic, agricultural, aesthetic, biotic, rare and endangered species habitat, and openness values of the Preserve," and the objective of: "Management of the Preserve in a manner that minimizes impacts and enhances natural resources".

2-2

My primary concerns are regarding management of the population of Clara Hunt's milkvetch that occurs on the Preserve, and on the adjacent private property (Hayfork Ranch). In addition to owning the Preserve, the Sonoma County Agricultural Preservation and Open Space District (District) holds a conservation easement on the adjacent Hayfork Ranch property. The population of Clara Hunt's milkvetch on the Preserve and the Hayfork Ranch is not yet documented in the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB); however, CDFW staff will update the CNDDDB later this month and Clara Hunt's milkvetch element occurrence (EO) 14 will be included in that update.

2-3

There are currently six known occurrences of Clara Hunt's milkvetch: four of them are in Napa County (EOs 7, 11, 12, and 13), and two of them are in Sonoma County (EOs 3 and 14). EO 3 is the occurrence on the Hayfork Property that is close to the reservoir, and is separate from EO 14. Based on the information available to me, one of the occurrences in Napa County (EO 7) has declined over the last several decades and may now be extirpated, and another occurrence in Napa County (EO 11) appears to be declining as well, which suggests that this species may be in serious decline. The Preserve provides an important refuge for Clara Hunt's milkvetch, and management of Clara Hunt's milkvetch habitat on the Preserve may be critical for preventing the extinction of the species. For this reason, I have a few recommendations for the management plan and corresponding IS/MND.

2-4

(1) I recommend that the District request permission from the owner of Hayfork Ranch, to expand Clara Hunt's milkvetch monitoring efforts so that EO 14 is monitored on both sides of the fence annually and that the results of this monitoring effort are submitted each year to cnddb@wildlife.ca.gov. This is important because it will allow the District to compare portions of the Clara Hunt's milkvetch occurrence that are on different sides of the fence and are therefore managed differently. Examining the portion of EO 14 that is on the Hayfork Ranch side of the fence will also allow the District to have easy access to a "reference population" for Clara Hunt's milkvetch to aid in identification of the species on the Preserve during field surveys, as described in [CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#). The owner of Hayfork Ranch may also

2-4 cont

be interested in receiving additional information on the portion of EO 14 that is on Hayfork Ranch.

2-5

(2) In an effort to enhance the Clara Hunt's milkvetch population, in line with the overall purpose of the Preserve and objectives of the management plan, I also recommend that the District implement a monitoring and adaptive management plan for the Clara Hunt's milkvetch population on the Preserve as a part of the overall management plan. Implementation of such a monitoring and adaptive management plan would not only be very beneficial for the Clara Hunt's milkvetch population on the Preserve, but could also be beneficial for the entire species. Such an effort could try to examine whether removal of vegetation in the summer and early fall has a positive effect on the germination and reproduction of Clara Hunt's milkvetch. Vegetation management techniques such as fire, livestock, raking of residual dry matter, and/or mechanical removal using weed whackers or other equipment could be examined to try and determine which management techniques are beneficial for the species. The program that I work for (CDFW's Native Plant Program) is responsible for issuing scientific permits for state-listed plants, and I can answer any questions you may have regarding permitting for scientific studies of management strategies.

2-6

(3) I recommend that the District avoid and minimize impacts to Clara Hunt's milkvetch plants by implementing some simple avoidance protocols, for instance: (a) between November and mid-March when plants will be very difficult to see and avoid, the portion of the Preserve that contains Clara Hunt's milkvetch shall be completely avoided, and (b) between mid-March and May, the portion of the Preserve that contains Clara Hunt's milkvetch shall only be visited if permitted visitors are accompanied by a botanist or other individual who can positively identify Clara Hunt's milkvetch, and that botanist or other individual ensures that all visitors to the area avoid trampling of Clara Hunt's milkvetch plants by using pin flags or other techniques to identify Clara Hunt's milkvetch plants in the field.

Thank you for the opportunity to provide comments on these documents, and for the District's efforts to conserve and protect rare and endangered species habitat at the Saddle Mountain Open Space Preserve.

Response to Comment Letter 2: California Department of Fish and Wildlife

Response to Comment 2-1

The commenter reviewed the Management Plan and Initial Study/Proposed Mitigated Negative Declaration and provided comments associated with Clara Hunt's milk vetch (*Astragalus claranus*). The commenter felt the management plan and IS/MND were well-prepared and is pleased with the purpose of the acquisition and management objectives. Ag + Open Space appreciates the feedback.

Response to Comment 2-2

The commenter expresses concern about the management of the existing population of Clara Hunt's milk vetch on the Preserve and on the adjacent Hayfork Ranch. Ag + Open Space shares the commenter's concern, and the comment is correct that Ag + Open Space holds a conservation easement over the Hayfork property. The population of Clara Hunt's milk vetch was documented on the Preserve in April 2009 and documentation has been added to the California Natural Diversity Database (CNDDDB). Ag + Open Space looks forward to CDFW's updates in CNDDDB. Additional populations of Clara Hunt's milk vetch have been previously documented on the Hayfork Ranch property. A small annual plant in the pea family (Fabaceae), the only known populations are located in Sonoma and Napa counties, where it typically is located in open areas or grasslands on thin, volcanic, clay soils. It seems to favor lightly disturbed areas on the property with monitoring results showing highest plant counts within trails and roadways, and adjacent to recent mammal burrows. Clara Hunt's milk vetch is found in areas lightly grazed by horses on an adjacent property; however, horse no longer appear to graze the entirety of the Clara Hunt's milk vetch population area on Hayfork Ranch.

Ag + Open Space has participated in monitoring efforts with CDFW staff and conducts special-status plant species counts annually to track population numbers on the Preserve. The Management Plan and the IS/MND address the presence of Clara Hunt's milk vetch on the Preserve and the management strategies and necessary mitigation measures for the species.

Response to Comment 2-3

The commenter discusses the number of known occurrences of Clara Hunt's milk vetch in Sonoma and Napa counties and notes that the species may be in serious decline. As noted in the response to comment 2-2, Ag + Open Space is aware of the important habitat the Preserve and Hayfork Ranch provide for Clara Hunt's milk vetch, and acknowledges that active management to encourage expansion of this population is appropriate. No changes to the IS/MND are necessary to address the comment. See response to comment 2-6 for the management plan changes made in response to this comment.

Response to Comment 2-4

The commenter suggests that Ag + Open Space request permission from the owner of Hayfork Ranch to expand Clara Hunt's milk vetch monitoring efforts to include the population outside the Preserve. Ag + Open Space agrees to request seasonal access with the landowner and to add the area to the on-going annual population count, if access is granted to the property, and to share data and management recommendations with the landowner. Ag + Open Space encourages CDFW to expand their annual Clara

Hunt's milk vetch monitoring program to include occurrences on the Preserve and surrounding property to add to the on-going studies of population trends. CDFW is also welcome to participate in the annual population counts conducted by Ag + Open Space. Ag + Open Space agrees to submit occurrence counts to CNDDDB as requested in the comment. No changes to the Management Plan or the IS/MND are necessary.

Response to Comment 2-5

The commenter suggests that Ag + Open Space implement a monitoring and adaptive management plan for the Clara Hunt's milk vetch population on the Preserve as a part of the overall Management Plan. Ag + Open Space will continue to conduct annual monitoring of Clara Hunt's milk vetch plant counts and habitat conditions, and will implement management changes to protect the species as needed. Additionally, per previous discussion with CDFW, Ag + Open Space agrees to begin small-scale management trials, such as thatch raking within test plots. See response to comment 2-6 for the management plan changes made in response to this comment.

Response to Comment 2-6

The commenter suggests that Ag + Open Space implement avoidance measures to protect Clara Hunt's milk vetch from November to mid-March and from mid-March to May annually. Clara Hunt's milk vetch occurs in mildly disturbed areas on the Preserve (e.g., in areas where thatch is not present) and the population area is located within and along the access road that runs through the Preserve. As such, Ag + Open Space agrees to flag around the known population area to route Ag + Open Space staff, Preserve patrollers, and visitors on docent-led hikes around the population area between November and May. Ag + Open Space also agrees to educate Preserve patrollers and other visitors to the Preserve about the importance of avoiding impacts to individual plants in the flagged area. The Preserve road is closed to vehicle use during these months. However, emergency access (e.g., fire trucks and other emergency vehicles) will have full access along the Preserve access road in the event of an emergency on the Preserve. To address the comment, the following requirement is added to Mitigation Measure BIO-1, Avoid Loss of Special-status Plants and their Habitats (IS/MND page 80):

- Ensure that Clara Hunt's milk vetch populations are protected from impacts associated with Preserve access. Ag + Open Space shall install sensitive area flagging around the known population area to route Ag + Open Space staff, Preserve patrollers, and visitors around known population areas. The seasonal avoidance zone shall be flagged around the Clara Hunt's milk vetch population from November - May to prevent trampling while this annual plant is growing and setting seed. The location and purpose of this zone shall be shared with volunteer patrollers and other Preserve visitors in order to increase awareness of the sensitivity and necessary protection of this plant population. Ag + Open Space shall educate Preserve patrollers and other visitors about the importance of avoiding impacts on individual plants in the flagged areas. Ag + Open Space shall continue to conduct annual monitoring of the Clara Hunt's milk vetch population on the Preserve. This monitoring shall continue, in coordination with California Fish and Wildlife to the greatest extent possible, with documentation of plant counts and current site conditions collected and retained.

In addition to the mitigation language changes, the following changes were made to the Management Plan:

Added to Section 4.3 (Buffer zones for sensitive features, page 57):

Additionally, a seasonal avoidance zone should be flagged around the Clara Hunt's milk vetch population from November - May to prevent trampling while this annual plant is growing and setting seed. The location and purpose of this zone should be shared with volunteer patrollers and other Preserve visitors in order to increase awareness of the sensitivity and necessary protection of this plant population.

Added to Section 4.6.1 (Monitoring protocols, page 62):

Monitoring of Clara Hunt's Milk Vetch

Ag + Open Space currently conducts annual monitoring of the Clara Hunt's milk vetch population on the Preserve. This monitoring should continue, in coordination with California Fish and Wildlife to the greatest extent possible, with documentation of plant counts and current site conditions collected and retained.

Added to 4.1.2 (Grassland habitat enhancement, page 54):

In coordination with California Fish and Wildlife and under appropriate regulatory permits, small-scale trial treatments such as manual thatch removal within the Clara Hunt's milk vetch population area would be appropriate in order to test methods of enhancing habitat and encouraging more robust reproduction of this species.

-----Original Message-----

From: Fred Clement <fsclement@yahoo.com>

Sent: Tuesday, May 28, 2019 10:14 AM

To: Monica Delmartini <Monica.Delmartini@sonoma-county.org>

Subject: TO HAVE HANGGLIDING ADDED TO ACTIVITIES ALLOWED FROM SADDLE MOUNTAIN

Hi Monica, I enjoyed the hike up to Saddle Mountain with you a few weeks back. I just wanted to send you this request to have Hang gliding and Paragliding officially included in the plan for approved activities on Saddle Mountain. Hang gliding has been an activity from Saddle Mountain since the 1980's and the local Hang gliding community would like to have access to this local site. As I stated to you Hang gliding is a very low impact activity form Saddle Mountain. This site would probably be used a dozen or so days a year at most. Mainly in the spring when the conditions are right for a soaring flight from the ridge top. The Hang gliding community has liability insurance through the United States Hang gliding and Paragliding Association (USHPA) ushpa.org Our local hang gliding chapter is [Sonomawings.com](http://sonomawings.com) Thank you Sincerely Fred Clement P.S. if you need more information please contact the local club. sonomawings.com Or me

3-1
[REDACTED] Thanks

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Response to Comment Letter 3: Fred Clement

Response to Comment 3-1

The commenter requests that hang gliding and paragliding be added to the activities allowed on the Saddle Mountain Preserve. The purpose of the acquisition is to conserve and protect the natural, scenic, agricultural, aesthetic, biotic, rare and endangered species habitat, and openness values of the Preserve. Recreational access onto the Preserve must be compatible with the conservation purposes. Ag + Open Space evaluates requests for access to District-owned properties according to an established public access policy. As such, Ag + Open Space will review this specific request for access separate from the Management Plan process. Once ownership of the property is transferred to another entity, hang gliding and paragliding will be included in the range of recreational uses to be formally evaluated for consistency with both the conservation values and the future management and operation of the Preserve.

In addition, the following changes have been made to the Management Plan to clarify future public access on the Preserve. The following paragraph has been added to the end of Section 1.2 (page 2) of the Management Plan:

Ultimately the intent is to transfer ownership of the Preserve to another conservation entity, likely a public parks agency, with Ag + Open Space retaining a conservation easement and other legal agreements that will ensure permanent protection of the land as well as appropriate public access. To date, a transfer recipient for Saddle Mountain Open Space Preserve has not been identified.

The following paragraph has been added to the beginning of Section 2.4 (page 11) of the Management Plan:

Public access to the Preserve under Ag + Open Space ownership is currently permitted through participation in the Ag + Open Space volunteer patrol program and via educational public outings organized by contracted partners. At such time that ownership of the Preserve is transferred to another entity for long-term operation and maintenance, potential public access and recreational uses will be formally evaluated and updated.

Saddle Mountain Management Plan Public Meeting

May 6, 2019 Public Comments, Page 1 of 3

Q Question, A Answer, C Comment, S Suggestion

PC-1

Q Is there still a pileated woodpecker on property?

A Yes.

PC-2

Q Are ravens a threat to spotted owls?

A We will look into that.

PC-3

C Need to have patrol on property.

A We have volunteer patrol, staff, and consultants visiting the property.

PC-4

Q When on property with LandPaths for a recent outing, there was a gate. Will there still be a gate or will there be open access?

A Outings will still be led by consultants, and access location on preserve depends on types of outings. Gates will remain in place and outings leaders are given combos.

PC-5

Q Do you have relationships with Sonoma State Uni (SSU) or Santa Rosa Junior College (SRJC) to get students and researchers on land?

A Yes, Soundscapes with SSU.

A All are possible and encouraged under Management Plan.

PC-6

Q Access on St. Helena Road?

A Short frontage and private property issues (inholding) preclude access at this time.

A Possibility in future if we were to purchase inholding.

PC-7

Q Construction access point for future road work?

A Cleland Ranch Rd, maybe Plum Ranch and Erland roads depending on project location.

PC-8

Q LandPaths recently could not get through a locked gate. Is this an ongoing issue?

A We changed gate code and sent the new number to LandPaths, but that person was out of the office.

PC-9

Q Are there other methods of outreach for volunteer patrol?

A Two VP trainings per year, newsletters, social media, website.

S Alpine Club, Friends of Mark West Watershed could help promote through email lists.

Q Will the Erland-Cleland Tie Rd. be available for use for emergencies this fire season?

PC-10

A Yes.

Q Shaded fuel breaks—how will they be accomplished?

PC-11

A CalFire crews, volunteers for minor tree removal.

S North Bay Conservation Corps.

Q Will we rely entirely on CalFire for the development of burn plans? State Parks has a different approach.

PC-12

A CEQA doc recommends creation of a forest management plan; will involve consultation with registered professional forester, prescribed fire specialist, tribes, other ecological consultants and will provide guidance for future burn plans. Cal Fire will be responsible for operational burn plan but will need to coordinate with us on ecological objectives, optimal timing, and sensitive resource considerations.

Q Fire exit road through Erland—you mentioned there is a locked gate?

PC-13

A We have provided gate codes to Erland Road neighbors who are Volunteer Patrollers.

Q How to best educate people about condition of emergency access road? Maybe have a meeting on site?

PC-14

A Yes, we can organize a site visit.

Q What is “Limited Public Access?”

PC-15

A Guided public outings, volunteer patrol, access for research and education

Q Describe Mitigated Negative Declaration Notice

PC-16

A

- CEQA language
- Is there an impact to the environment?
- Mitigated negative declaration = no impact if mitigated

Q Hang Glider Interest in Rincon Ridge

PC-17

- Low impact, air patrol
- Rincon Ridge has history of hang gliders since the 80s
- Four to five people is approximately equal to twelve days per year

A Provide written comment/inquiry during public comment period

Q How many average Volunteer visits per month

PC-18

PC-18 cont

Two to three report, Likely under-reported

Alpine Club email list and Friends of Mark West Volunteer Patrol

Q Timeline for erosion work?

PC-19

A Erosion—likely next spring.

A Fuels management –depends on CalFire, high priority.

S North Bay Conservation Corps interest in fuel break work.

Q Use of well for fire suppression? Helpful for prescribed burn?

PC-20

A Possibly but flow rate may be too low, especially for suppression

Q Hydrology and vegetation management to enhance salmonid habitat?

PC-21

A Ag + Open Space could work with researcher, if scientific interest.

Public Hearing Comments

Response to PC-1

The commenter asked if pileated woodpeckers are still present on the Preserve. Pileated woodpeckers, as well as Nuttall's woodpecker, are present on the Preserve.

Response to PC-2

The commenter asked if ravens are a threat to northern spotted owls. In general, ravens, as well as some other avian species, have been known to compete with northern spotted owls for food and cover and occasionally attempt to prey on their eggs. However, little is known at this time regarding any specific impacts ravens may have on northern spotted owls on the Preserve. Ag + Open Space will cooperate with any researchers or other entities that would like to explore this issue.

Response to PC-3

The commenter stated that the property needs to be patrolled. Ag + Open Space trains volunteers to patrol the Preserve, and Ag + Open Space staff and consultants regularly visit the property.

Response to PC-4

The commenter asked if the gate at the Preserve access point along Calistoga Road will remain in place or if the Preserve will be open to the general public. Ag + Open Space will maintain the locked gate and public access to the Preserve will be limited to docent-led outings, trained volunteer patrols, and researchers.

Response to PC-5

The commenter asked if Ag + Open Space has relationships with Sonoma State University or Santa Rosa Junior College to allow students and researchers to access the Preserve. Ag + Open Space currently works with Sonoma State University's Soundscape project to allow ongoing research on the Preserve. Ag + Open Space will continue to coordinate and cooperate with researchers and institutions to allow access to the Preserve for research and environmental education.

Response to PC-6

The commenter asked if there is access to the Preserve from St. Helena Road. Currently, only a small portion of the Preserve (approximately 500 feet) fronts St. Helena Road. The small size of this frontage, along with private inholdings along the road, preclude feasible access to the Preserve from St. Helena Road.

Response to PC-7

The commenter asked about the construction access point for future road and erosion control work. Cleland Ranch Road, and potentially Plum Ranch and Erland roads, will be used for construction access depending on specific project location.

Response to PC-8

Commenter noted that LandPaths recently was unable to get through the locked gate at the entrance to the Preserve and asked if this is an ongoing issue. Ag + Open Space maintains a locked gate at the Preserve

access point off of Calistoga Road and periodically changes the gate code. When the gate code is changed, the updated code is sent to partner organizations, including LandPaths.

Response to PC-9

The commenter asked about the method of outreach for volunteer patrols and suggested that the Alpine Club and Friends of Mark West Watershed could help promote volunteer trainings and other events through their email lists. Ag + Open Space will coordinate with the Alpine Club and Friends of Mark West Watershed to conduct outreach for public outings, volunteer trainings, and other events.

Response to PC-10

The commenter asked if Erland-Cleland Tie Road would be available for use for emergencies during the fire season. Emergency services will be able to travel through the Preserve via Erland-Cleland Tie Road when necessary. The road can be used as a secondary escape route for nearby residents, but the road is not maintained for regular vehicle use and may not be accessible for all vehicles. Use of the road as an emergency escape route in the event of wildfire is not recommended, especially at night or during high winds. Ag + Open Space will coordinate with nearby residents and landowners regarding emergency use of the Preserve's roads, but recommends neighbors establish an appropriate safety zone along Erland Road in which residents could shelter safely in place.

Response to PC-11

The commenter asked how the construction of shaded fuel breaks will be accomplished and suggested that the North Bay Conservation Corps could assist with this management activity. Ag + Open Space anticipates that shaded fuel breaks will be implemented on the Preserve in close coordination with CalFire and CalFire crews. Ag + Open Space staff, contractors, and volunteers would likely participate. Ag + Open Space will coordinate with the North Bay Conservation Corps to explore opportunities for partnering with that organization to implement planned management activities, including shaded fuel breaks.

Response to PC-12

The commenter inquired about the process for developing prescribed fire plans and the extent of CalFire involvement. Ag + Open Space will develop a Forest Management Plan or similar document that will guide the overall natural resource goals and objectives of prescribed burn projects and vegetation management activities on the Preserve. Ag + Open Space will be primarily responsible for initial burn planning, including identifying resource objectives and seasonality. CalFire will serve as an operational partner and will develop operational plans and incident action plans for prescribed burn projects, and will take a lead role in implementing burns under a VMP contract.

Response to PC-13

The commenter asked about the locked gates along Erland-Cleland Tie Road, in reference to its use as a potential fire exit route. Ag + Open Space provides gate codes for the Erland Road gate to neighbors who are trained volunteer patrollers. See Response to PC-10.

Response to PC-14

The commenter asked about the best way to educate people about the condition of the emergency access roads and suggested having a meeting on the site. Ag + Open Space appreciates this suggestion and will be glad to join a meeting with neighboring landowners to discuss and assess the condition of the road and its suitability as an emergency access route.

Response to PC-15

The commenter asked what is meant by “limited public access” to the Preserve. Ag + Open Space intends to allow guided public outings, volunteer patrols, and research and education activities to take place on the Preserve. See Section 2.5.7 of the Draft IS-MND (pages 48-49).

Response to PC-16

The commenter asked what is meant by “mitigated negative declaration.” Mitigated Negative Declaration is a term that is used under CEQA to denote that a lead agency has found that a project’s impacts to the environment would be less than significant with implementation of mitigation measures.

Response to PC-17

The commenter noted that hang gliders are interested in using the Preserve as a launching-off point. See response to Comment Letter 3, above.

Response to PC-18

The commenter asked how many volunteer patrols occur each month. Ag + Open Space typically receives report of two to three volunteer patrols each month. However, the actual number of volunteer visits is likely higher.

Response to PC-19

The commenter asked when the management activities described in the Management Plan would be implemented. Ag + Open Space anticipates that the erosion and road treatments will begin in the spring of 2020 and will be ongoing, occurring in the dry season of each year until the projects are complete. The fuels management activities are a high priority, but may depend on the availability of CalFire staff to coordinate and implement. Coordination with CalFire will begin upon Management Plan approval.

Response to PC-20

The commenter asked if the wells on the Preserve could be used for fire suppression or if they would be helpful for prescribed fire activities. The wells on the Preserve are simply well casings; they are not developed, do not have pumps, and the flow rate of the wells is unknown. As a result, they are not suitable for fire suppression use. During all prescribed fire activities, engines with water tanks will be brought on site.

Response to PC-21

The commenter asked if research is being conducted regarding how hydrology and vegetation management activities could potentially enhance salmonid habitat on the Preserve. Hydrology monitoring is being conducted by the Coast Range Watershed Institute in coordination with the Sonoma Resource

Conservation District. Ag + Open Space welcomes the opportunity to work with additional researchers if there is scientific interest in investigating the effects to salmonid habitat of hydrology and vegetation management activities on the Preserve.

Lead Agency Changes

Ag + Open Space has made the following changes to the management plan and Draft IS/MND. These changes do not increase the severity of impacts already identified and do not require development of new mitigation measures. Revisions to the Draft Initial Study/Proposed MND in response to the comment letters are shown in underline text.

Jepson’s leptosiphon (*Leptosiphon jepsonii*) was recently discovered on the Preserve. The species is a California Native Plant Society Rank 1B.2 plant. Habitat for this species is chaparral dominated by mostly evergreen shrubs with thick, leathery leaves and stiff branches and cismontane woodland dominated by trees that are deciduous, evergreen or both with open canopies. The annual forb grows in open and partially shaded grassy slopes and blooms from April to May. Implementation of Mitigation Measure BIO-1, Avoid Loss of Special-status Plants and their Habitats and Mitigation Measure BIO-2, Protect Special-status Plants during Prescribed Burning are required to protect Jepson’s leptosiphon present on the Preserve. No changes to the mitigation measures are necessary.

The following changes are made in the Draft IS/MND in response to the recent identification of Jepson’s leptosiphon on the Preserve:

Page 22, Table 2-2:

Table 2-1. Special-status Plants Documented or with Potential to Occur on the Preserve

Scientific Name	Common Name	Listing Status ¹ USFWS/CDFW/CNPS
<i>Centromadia parryi</i> ssp. <i>parryi</i>	pappose tarplant	--/--/ 1B.2
<i>Eryngium constancei</i>	Loch Lomond coyote-thistle (=button-celery)	FE/SE/ 1B.1
<i>Fritillaria liliacea</i>	fragrant fritillary	--/--/ 1B.2
<i>Hemizonia congesta</i> ssp. <i>congesta</i>	white seaside tarplant	--/--/ 1B.2
<i>Layia septentrionalis</i>	Colusa layia	--/--/ 1B.2
<u><i>Leptosiphon jepsonii</i></u>	<u>Jepson’s leptosiphon</u>	<u>--/--/ 1B.2</u>
<i>Lupinus sericatus</i>	Cobb Mountain lupine	--/--/ 1B.2

¹ Listing Status: FE-federally listed as endangered, FT-federally listed as threatened, BCC-Bird of Conservation Concern, SE-state listed as endangered, ST-state listed as threatened, Candidate SE-state candidate to be listed as endangered under CESA Candidate ST-state candidate to be listed as threatened under CESA, FP-State of California fully-protected species, SSC-California Species of Special Concern, and WL-Watch List.

Page 79:

Special-status Plants

~~Nine~~ Ten special-status plant species are known to occur on the Preserve or have high potential to occur. These include one species (Clara Hunt's milk vetch), which is listed as federally endangered and state threatened; the remainder are considered rare by the California Native Plant Society. These plants are listed below, with proposed management activities that have the potential to adversely affect them. Activities of concern include ground-disturbing activities such as roadway erosion and drainage repair, invasive species control, prescribed fire, fuels reduction, and thinning. If management activities occur in habitats that support special-status plants, impacts on special-status plants could result, including direct loss of individual plants, loss of existing seedbanks, and alteration of habitat conditions.

Added to Section 2.15 (Sensitive Plant Species) as subsection 2.15.8:

In addition to the rare plant species documented in 2009, Jepson's leptosiphon (*Leptosiphon jepsonii*) (CNPS 1B.2) was documented along the Erland-Cleland Tie Road in 2019. The population was found growing on a seasonally wet roadbed within a patch of Coastal Oak Woodland and within the transition zone between Coastal Oak Woodland and Annual Grassland. The bioregional distribution of this species is the North Coast Ranges (Hickman 1993).