APPENDIX F

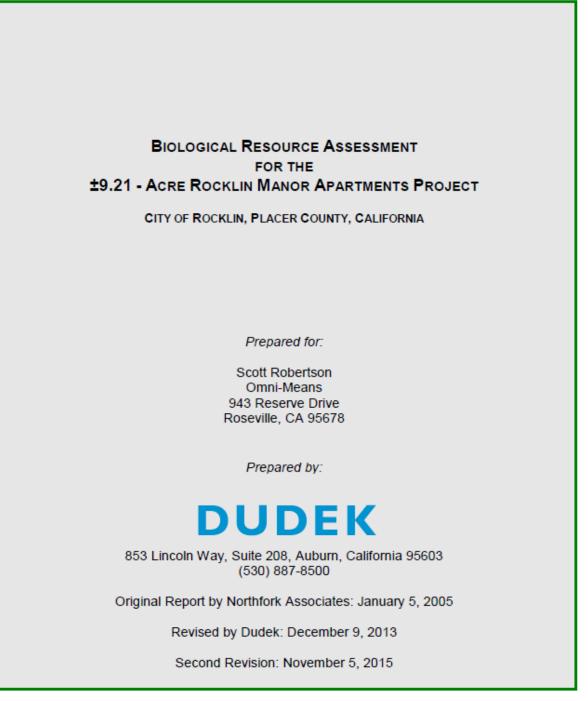


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BIOLOGICAL RESOURCE ASSESSMENT FOR THE ±9.21 – ACRE ROCKLIN MANOR APARTMENTS PROJECT

INTRODUCTION

Setting

Dudek conducted a biological resource assessment on the approximately 9-acre Rocklin Manor Apartments property in the city of Rocklin to update the existing biological resource assessment prepared by Northfork Associates in January 2005. The site is located at the southeast corner of the intersection of Rocklin Road and Sierra College Boulevard. It is situated in Section 21, Township 11N, Range 7E on the 7 ½ minute USGS Rocklin quadrangle (Figure 1).

The property occurs in the transition of the central valley and the Sierra Nevada foothills at elevations between 320 feet and 365 feet. Surrounding land uses include Sierra College to the northwest, commercial retail to the west, and residential housing to the east and south. The parcel immediately north is open disturbed grassland, but it is slated for development. Figure 2 shows the project site and surrounding areas.

Project Description

The proposed project is to build a multi-family residential apartment complex to support the growing population in Rocklin, California.

Objectives

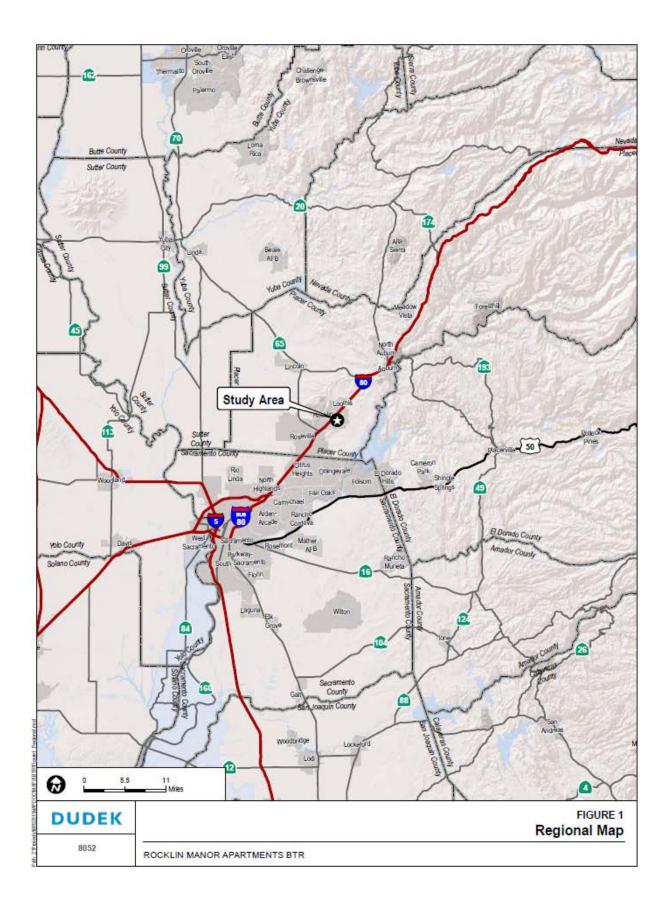
- · Identify and describe the biological communities present on the project site.
- · Record plant and animal species observed on the project site.
- Re-evaluate and identify sensitive resources and special-status plant and animal species that could be affected by project activities.
- Provide conclusions and recommendations.

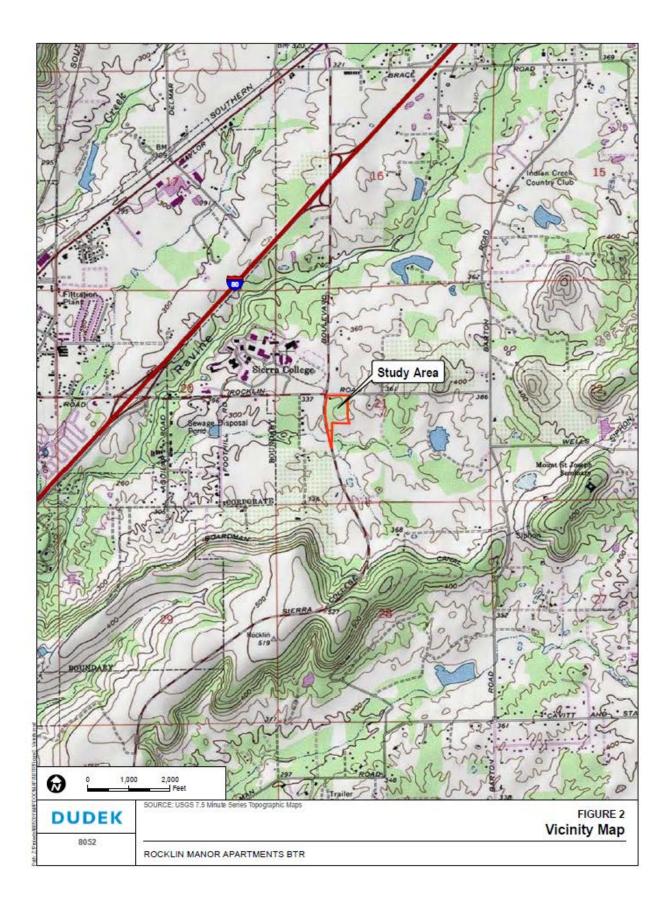
METHODS

Literature Review

Before going to the field, Dudek biologist Kevin Derby reviewed soils and geology maps and aerial photographs of the area. Topographic maps and a several aerial photographs were also reviewed. The following publications were reviewed to provide information on life history, habitat requirements, distribution, and conservation status of regionally occurring animal species: *California's Wildlife*, Volumes I-III (Zeiner et al. 1988, 1990a, 1990b), *A Field Guide to Western Reptiles and Amphibians* (Stebbins 1985), *Mammals of the Pacific States* (Ingles 1965), *The Peterson Field Guide to Hawks of North America* (Clark and Wheeler 1987) and *The Sibley Field Guide to Birds of Western North America* (Sibley 2003).

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Special Status Species Reports

Dudek queried the California Natural Diversity Database (CNDDB, RareFind 4) for a list of special status plant and animal species known to occur in the region. The following USGS quadrangles were included in the query: Gold Hill, Auburn, Lincoln, Roseville, Rocklin, Pilot Hill, Citrus Heights, Clarksville and Folsom. In addition, Dudek biologists reviewed lists of special status species in Placer County maintained by the U.S. Fish and Wildlife Service and the California Native Plant Society. Appendix A contains the results of the CNDDB and USFWS searches.

Field Assessments

Field assessment surveys were conducted in November, 2013 by Kevin Derby. Weather during the field survey was clear and dry and temperatures were approximately 55 degrees Fahrenheit.

The entire site was surveyed and observations about plants, animals and habitat characteristics were recorded. A list of plants observed is located in Appendix B.

In spring 2015, Dudek conducted a general site survey to confirm that conditions had not changed since 2013. Dudek also conducted western pond turtle and nesting bird surveys in August, 2015 in anticipation of the start of construction.

POTENTIALLY OCCURRING SPECIAL STATUS SPECIES

For the purposes of this report, special status species are those that fall into one or more of the following categories:

- listed as endangered or threatened under the federal Endangered Species Act (or formally proposed for listing),
- listed as endangered or threatened under the California Endangered Species Act (or proposed for listing),
- designated a Species of Concern or a Species of Local Concern by the Sacramento District of the U.S. Fish and Wildlife Service (USFWS),
- designated as rare, protected, or fully protected pursuant to California Department of Fish and Wildlife (CDFW) code,
- designated a Species of Concern by the California Department of Fish and Wildlife,
- defined as rare or endangered under the California Environmental Quality Act (CEQA), or
- occurring on List 1 or 2 maintained by the California Native Plant Society (CNPS).

The results of the CNDDB search resulted in the identification of eighteen special-status animal species and eleven special-status plant species known to occur in the lower

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elevations of Placer County. Additionally, USFWS lists seven animals and six plants that are federally protected in the vicinity of the project site. Of these, suitable habitat exists for six animal species and five plant species. These are described in Table 1 and discussed further. Four additional species were added to this table that were not identified on CNDDB or UWFWS lists, but have the potential to occur on the project site due to the availability of suitable habitat.

Special-status plant and animal species known to occur in the area but are dependent on specialized emergent wetland habitat types, vernal pools and lakes that do not occur on or near the project, or have range boundaries that occur outside the project site were eliminated from further investigation. These included: Stebbin's morning glory (Calystegia stebbinsii), pine hill ceanothus (Ceanothus roderickii), El Dorado bedstraw (Galium californicum ssp. sierrae), Tahoe yellow cress (Rorippa subumbellata), Layne's ragwort (Senecio lavneae), Sacramento orcutt grass (Orcuttia viscida), dwarf downingia (Downingia pusilla), Boggs Lake hedge-hyssop (Gratiola heterosepala), legenere (Legenere limosa), pincushion navarretia (Navarretia mversii ssp. mversii), stinkbells (Fritillaria agrestis), Sanford's arrowhead (Saggitaria sanfordii), vernal pool adrenid bee (Andrena subpasta), Conservancy fairy shrimp (Branchinecta conservatio), vernal pool fairy shrimp (Branchinecta lynchi), vernal pool tadpole shrimp (Lepidurus packardi), California linderiella (Linderiella occidentalis), Ricksecker's water scavenger beetle (Hydrochara rickseckeri), Lahontan cutthroat trout (Oncorhynchus clarkia henshawi), California tiger salamander (Ambystoma californiense), giant gartersnake (Thamnophis gigas), great blue heron (Ardea herodias), grasshopper sparrow (Ammodramus savannarum), song sparrow ("Modesto" population, Melospiza melodia), California black rail (Laterallus jamaicensis coturniculus), burrowing owl (Athene cunicularia), Swainson's hawk (Buteo swainsoni), osprey (Pandion haliaetus) and tricolored blackbird (Agelaius tricolor).

Table 1
Special Status Species with Potential to Occur in the Project Region

Species	Federal	State	CNPS	Habitat	Potential for Occurrence
Plants	•				
big-scale balsamroot (Balsamorhiza macrolepis var. macrolepis)	-	-	List 1.B	Valley grassland, foothill woodland	Moderate. Suitable habitat exists for this species.
Brandegee's clarkia (Clarkia biloba ssp. brandegeeae)	-	-	List 1.B	Foothill woodland, chaparral	Moderate. Suitable habitat exists for this species.
hispid bird's-beak (Chloropyron molle ssp.hispidum)	-	-	List 1.B	Valley grassland, wetland-riparian	Low. Marginal habitat exists for this species.

Species	Federal	State	CNPS	Habitat	Potential for Occurrence
Ahart's dwarf rush (Juncus leiospermus var. ahartii)	-	-	List 1.B	Valley grassland, freshwater wetland, wetland- riparian	Low. Marginal habitat exists for this species.
Red Bluff dwarf rush (Juncus leiospermus var. leiospermus)	-	-	List 1.B	Valley grassland, wetland riparian	Low. Marginal habitat exists for this species.
Amphibians	ļ				
western spadefoot (Spea hammondi)	-	CSC	-	Pools and Stockponds (breeding)	Low. Seasonal fluctuations in rainfall could provide breeding habitat on-site.
Reptiles	_				
western pond turtle (Emys marmorata)	-	CSC	-	Permanent water basking sites, uplands for nesting	Moderate. Suitable aquatic and upland habitat exists along stream.
Insects					
valley elderberry longhorn beetle (Desmocerus californicus dimorphis)	FT	-	-	Elderberry shrubs	Low. No elderberry shrubs occur on-site. Few shrubs occur just outside project boundary.
Birds					
Cooper's hawk (Accipiter cooperii)	-	SWL	-	Open woodland, riparian deciduous	Moderate. Suitable nesting and foraging habitat exists.
Sharp-shinned hawk (Accipiter striatus)	-	SWL	-	Woodland forest	Moderate. Suitable nesting and foraging habitat exists.
white-tailed kite (<i>Elanus leucurus</i>)	-	SFP	-	Valley grassland	Low. Semi-suitable foraging habitat exists north of the site and nesting habitat exists on- site.
tri-colored blackbird (Agelaius tricolor)	-	CSC	-	Marshes, agricultural land, riparian	Low. Suitable nesting habitat occurs in blackberry patches.
purple martin (Progne subis)	-	CSC	-	Open areas, urban	Moderate. Suitable nesting habitat occurs on-site and foraging habitat occurs just north of the site.
Fish					

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Species	Federal	State	CNPS	Habitat	Potential for Occurrence
central valley steelhead (Oncorhynchus mykiss irideus)	FT	-	-	Creeks and streams, tributaries to Sacramento delta	Low. No documented occurrences of spawning in Secret Ravine, although there is potential to stray into tributary on-site during periods of high flow.
Chinook salmon- central valley fall-run (Oncorhynchus tshawytscha)	-	CSC	-	Creeks and streams, tributaries to Sacramento delta	Low. No documented occurrences of spawning in Secret Ravine, although there is potential to stray into tributary on-site during periods of high flow.

Federal: FT= federally threatened species

State: CSC= California species of special concern

SWL= California state watch list

SFP= California state fully protected

CNPS: 1B = plants rare, threatened or endangered in California and elsewhere

Species with moderate potential to occur are discussed further below.

Plants

Big-scale balsam-root (*Balsamorhiza macrolepis* var. *macrolepis*) is an herbaceous perennial member of the sunflower family (Asteraceae). It has no state or federal status, but it is on the CNPS List 1B. This species has large yellow flowering heads and leaves that arise from the ground. It differs, in part, from other balsam-roots by having coarsely serrate leaves. Big-scale balsam-root grows in open woodlands and grasslands at widely scattered locations in northern California, and will tolerate serpentine soil. It blooms from March to June.

Brandegee's clarkia (*Clarkia biloba* ssp. *brandegeeae*) is an erect annual member of the evening primrose family (Onagraceae). It has no state or federal status, but it is on the CNPS List 1B. Brandegee's clarkia differs from similar species by having pendant buds, notched petals, and eight stamens. It can be found in oak woodlands in the Sierra foothills from Butte County to El Dorado County. Its common name, farewell-to-spring suggests its late blooming period, usually from May to July.

Wildlife

Western pond turtle (*Emys marmorata*) is in the family Emydidae, which includes box and water turtles. It is a California species of special concern. The western pond turtle is found in generally quiet waters in a wide variety of habitats including ponds, marshes, lakes, streams, irrigation ditches, and vernal pools. Aquatic habitats with adequate vegetative cover and exposed basking sites are utilized. They are omnivorous generalists and opportunistic predators, eating small insects, aquatic invertebrates, fish, frogs, snakes, birds, and mammals. The pond turtle is secretive and prefers habitats with large areas for cover (logs, algae, vegetation) and basking (logs, boulders). Mating occurs in April and May, after which females build nests along wetland margins or in adjacent uplands. Hatchlings emerge approximately 12 weeks after oviposition (October and November). Population decline is due to habitat loss and alteration, fragmentation, little or no recruitment, introduction of alien species (e.g. bullfrog) and commercial harvest.

Cooper's hawk (*Accipiter cooperii*) is a member of the family Accipitridae, which includes hawks, kites, harriers and eagles. It is on the California state watch list and is protected under the Migratory Bird Treaty Act. The Cooper's hawk, once considered a common bird throughout California, has declined throughout its range as a breeding bird. Cooper's hawk prefers areas with dense stands of live oaks, riparian deciduous forests or other forested areas near water. They nest in crotches of deciduous trees 20-50 ft above ground. Nest is a stick platform lined with bark. Cooper's hawk breeds from March through August with peak activity between May and July. Courtship behavior is not well documented but appears to involve flights that begin with both birds soaring on thermals and end with a slow speed chase of the female by the male. Cooper's hawks are mostly lie-in-wait hunters, perching inconspicuously in trees waiting for an opportunity to feed. On occasion they also hunt by flying over woodlands or along fence rows to surprise potential prey. Birds are the primary prey, but small mammals and lizards are also taken. Habitat destruction, mainly in lowland riparian areas, is the principal threat to breeding Cooper's hawks.

Sharp-shinned hawk (*Accipiter striatus*) is the smallest hawk in North America and is a member of the family Accipitridae, which includes hawks, kites, harriers and eagles. It is on the California state watch list and is protected under the Migratory Bird Treaty Act. Sharp-shinned hawk occurs in a wide range of woodland and forest types, both dominated by conifers and by various types of broad-leaved trees, especially oaks. These birds surprise and capture their prey from cover or while flying quickly through dense vegetation. The majority of their prey is comprised of small birds but they will also take lizards, small rodents, frogs and snakes on rare occasion. Sharp-shinned hawks construct a stick nest in a large conifer or dense group of deciduous trees and usually lays a clutch of 4-6 eggs.

Purple Martin (*Progne subis*) is classified under the order *Passeriformes*, which includes the perching birds. Further classification places the purple martin in the swallows and martins family (*Hirundinidae*). It has no Federal designation but is a CDFW Species of Concern. The purple martin nests from April to August, with peak activity in June. Pairs nest colonially or singly, depending on nest site availability. Nest building usually does not begin until several weeks after a pair bond has formed. Nests are built out of twigs and stems of herbaceous plants, leaves, and mud. The diet of the purple martin forages on the ground for ants and other insects. Usually the purple martin feeds solitarily and does not attempt to feed when air temperature is below about 50°F. In the western United States, the purple martin nests in old woodpecker cavities, mostly in habitats with patches of tall sycamores, pines, and other large trees in or near oak

woodlands or within open coniferous forests. The western populations of the purple martin nest solitarily in natural or woodpecker-made cavities in trees.

RESULTS

Soils

Two soil units have been mapped on the site: Andregg coarse sandy loam and xerofluvents, frequently flooded. Andregg soils are Mollisols and are derived from weathered granite. The site does not have gabbro or serpentine derived soils that often support special status plants.

Hydrology

The primary hydrological feature is the intermittent tributary of Secret Ravine, which is ultimately a tributary of the Dry Creek system. This stream had flowing water at the time of the delineation, and may support pockets of water during the summer months; however, it is unlikely that it sustains much flow during this time. The Sierra College road widening in 2010 improved stability and drainage in the area despite resulting in <0.01 acre of wetlands and waters of the U.S.

An upland swale occurs on the north side of the property near Rocklin Road. No culverts could be found discharging water into the swale, which has minimal effect on site hydrology. Groundwater discharge has created a small wetland within the swale.

Biological Communities

Three biological communities occur on the project site; foothill woodland, annual grassland and riparian woodland. Table 2 summarizes the estimated acreage of these communities. An aerial photo of the site (Figure 3) and a habitat map (Figure 4) show the general composition of the site.

Biological Community	Estimated Acreage
Foothill Woodland	7.59
Annual Grassland	1.56
Riparian Woodland	0.06
Total:	9.21

Table 2 Biological Communities

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The site consists primarily of foothill woodland community which is dominated by interior live oak (Figure 4). Blue oaks occur sporadically, with fewer occurrences of valley oaks and oracle (hybrid) oaks. The understory is herbaceous with intermittent patches of shrubs. Himalayan blackberry is common in the northern swale.

A small patch of ruderal annual grassland occurs in the southeast corner. This was part of a larger patch of open grassland that has been developed into residential housing. Ripgut brome, short-podded mustard, and yellow star-thistle are well adapted to disturbance and are common in the annual grassland on-site.

The unnamed tributary has a relatively broad floodplain on the south side that supports a mix of willow, valley oak and interior live oak on the upper portions. The understory is primarily Himalayan blackberry. Because scattered willows and valley oaks are present, the tributary has a narrow riparian canopy.

Special-Status Species

Plants

No special-status plants were observed during field surveys. Remnant leaves from bigscale balsam-root would have been evident during the survey, even in November and December. The fruiting stems of a species of *Clarkia* were found during the surveys, but this species is almost certainly the common *Clarkia purpurea*, based on the length and width of the capsule. Although chances are minimal that the site supports any rare plants, the timing of our field surveys makes the survey inconclusive.

Animals

No special-status wildlife was observed during November surveys. However, the site has suitable habitat for some special-status wildlife, including:

Western pond turtle. The unnamed tributary has suitable habitat for pond turtles, especially upstream from Sierra College Boulevard. The floodplain of the creek also has suitable basking sites for this species. Surveys for pond turtles should be conducted before construction begins. If any turtles are observed during surveys, minimization of disturbance to turtles is recommended by avoiding work in areas where turtles are present. No turtles were observed during August, 2015 surveys.

Cooper's hawk and other raptors. Although no nests were observed during surveys since it is outside of the nesting season, habitat for nesting raptors exists on-site. Preconstruction surveys for nesting raptors should be completed if construction is to begin during the nesting season (February through September), and guidance from a qualified biologist and possibly the California Department of Fish and Wildlife should be obtained if any active nests are located. An inactive nest was observed on the project site in June and August, 2015.

Valley elderberry longhorn beetle. Although no elderberry shrubs were identified on the project site, two shrubs do occur within 100 feet of the property boundary near the intermittent stream in the southwestern portion of the property. The City of Rocklin was required to informally consult with the United States Fish and Wildlife Service (USFWS)

regarding avoidance of impacts during the 2010 road widening project and made sure to stay more than 100 feet away utilizing exclusion fencing. The currently proposed multifamily housing project does not propose work in this portion of the property and therefore would not include work near the shrubs.

Waters of the United States

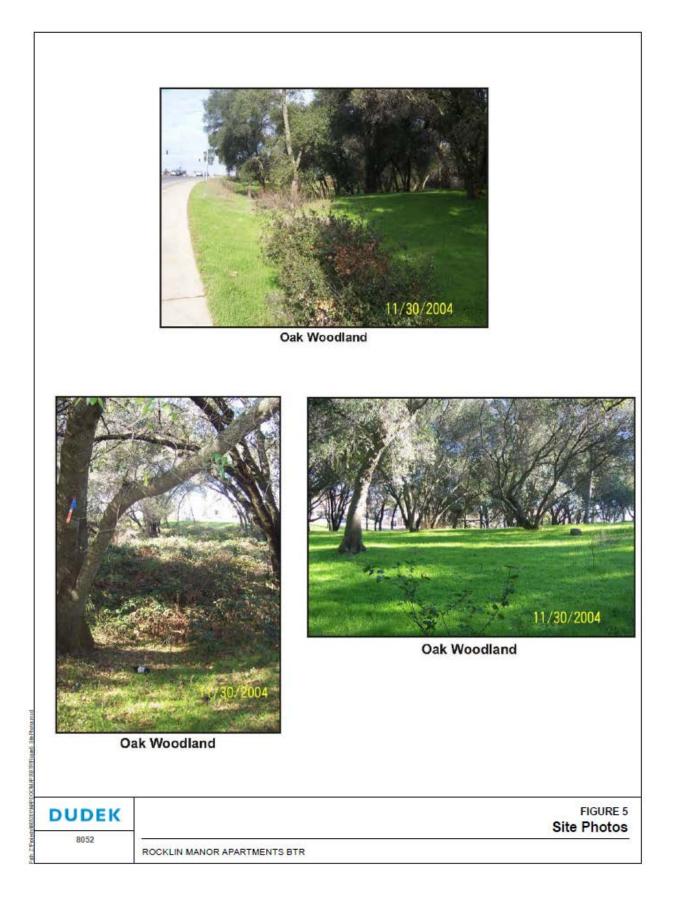
Waters of the United States were delineated on November 30, 2004 by North Fork Associates which showed approximately 0.03 acres that meet the definition of waters of the United States. Subsequently, Dudek checked the onsite conditions on November 25, 2013 to confirm this original delineation is still accurate and onsite conditions have not noticeably changed. A portion of this acreage is the unnamed tributary to Secret Ravine (Figure 5). The remainder consists of a seasonal wetland in what is otherwise an upland swale (Figure 6), and a wetland swale. There are no vernal pools on the project site. The delineation has been resubmitted to the Corps of Engineers for verification, which is currently pending. This wetland delineation was originally submitted in 2005 as the Sierra College Plaza commercial development project in 2007 and the proposed 0.03 acre of fill in wetlands and waters was verified pursuant to Nationwide Permit (NWP) 39 by the U.S. Army Corps of Engineers (ACOE) on January 17, 2008. However, due to unforeseen economic circumstances the property owner defaulted on the project and the City of Rocklin submitted a revised plan that only included widening of Sierra College Boulevard and 0.01 acre of impact to open water and adjacent riparian habitat. The City of Rocklin received authorization for this project change in a letter from the ACOE dated December 1, 2009, paid for the resulting mitigation to the NFWF Sacramento District Wetlands Conservation Fund, and completed the road widening project.

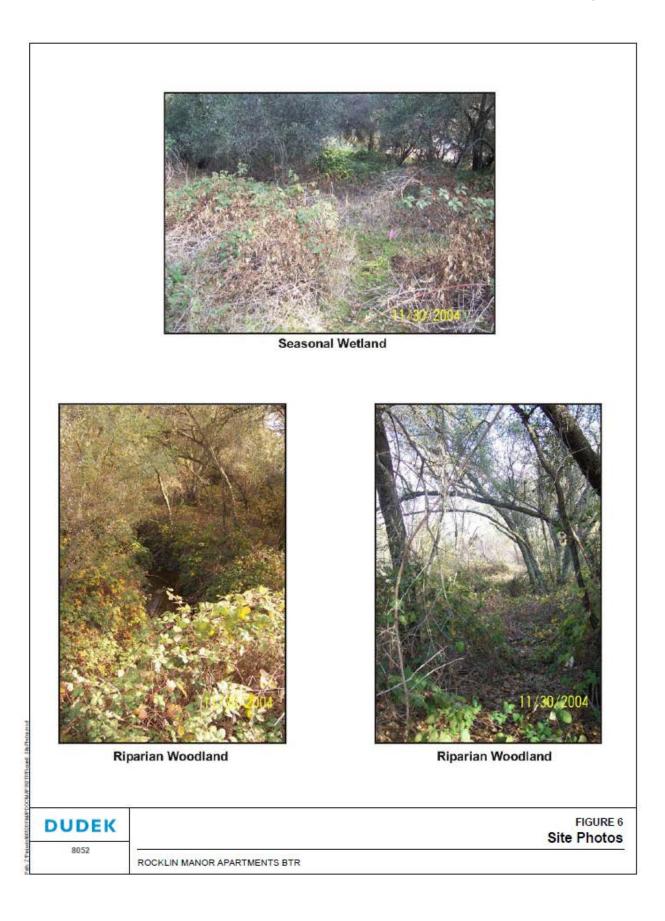
CONCLUSIONS AND RECOMMENDATIONS

- Wetlands and other waters on the site are within the regulatory authority of the Corps of Engineers, or the Regional Water Quality Control Board, or both. Permits from these agencies will be necessary for discharges to waters of the United States or waters of the State.
- The California Department of Fish and Wildlife regulates activities that affect streams, lakes, and ponds within the state. The unnamed tributary is within the jurisdiction of the Department pursuant to Section 1600 of the California Fish and Wildlife Code. Impacts to this area would require a lake or streambed alteration agreement with the Department.
- Based on field surveys, no potentially occurring special-status plant species occur on-site. The site does have marginal habitat for Brandegee's clarkia, and surveys during the blooming period would be required to determine the presence or absence of this species.
- Four special-status wildlife species were deemed to have a moderate potential to
 occur on the project site due to the presence of suitable habitat. It is recommended

clearance surveys be conducted in suitable habitat areas prior to construction activities.

- Western pond turtle was not observed during surveys; however, suitable aquatic habitat is provided in two locations: 1) the unnamed creek channel and 2) the pond upstream from Sierra College Boulevard. If construction activities will impact the creek, protocol surveys for western pond turtle should be conducted and avoidance and minimization measures should be taken if any turtles are observed.
- If construction is to occur within the February 1 to September 30 nesting period, preconstruction surveys should be conducted for nesting raptors and other birds. If an active nest(s) is located, a qualified biologist in consultation with CDFW shall recommend a buffer area around the nest(s). The buffer area should be delineated with orange construction fencing and no construction should take place within the buffer zone until the biologist has determined that all young have fledged and are capable of foraging independently.





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Appendix A

Results of CNDDB and USFWS Searches



Summary Table Report California Department of Fish and Wildlife California Natural Diversity Database



Query Criteria: County is (Placer) and Elevation is greater than or equal to "0" and Elevation is less than or equal to "1000"

				Elev.		E	Elem	ent O	cc. R	Ranks	;	Populatio	on Status	Presence			
Name (Scientific/Common)	CNDDB Ranks	Listing Status (Fed/State)	Other Lists	Range (ft.)	Total EO's	A	в	с	D	x	U	Historic > 20 yr	Recent <= 20 yr	Extant	Poss. Extirp.	Extirp.	
Agelaius tricolor tricolored blackbird	G2G3 S1S2	None None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_EN-Endangered NABCI_RWL-Red Watch List USFWS_BCC-Birds of Conservation Concern	70 305	603 S:15	0	2	1	0	2	10	2	13	13	2	0	
Alkali Meadow Alkali Meadow	G3 S2.1	None None		175 175	8 S:1	0	0	0	0	0	1	1	0	1	0	0	
Alkali Seep Alkali Seep	G3 S2.1	None None		150	10 S:1	0	0	0	0	0	1	1	0	1	0	0	
Ammodramus savannarum grasshopper sparrow	G5 S3	None None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	155 155	18 S:1	0	1	0	0	0	0	0	1	1	0	0	
Andrena subapasta an andrenid bee	G1G2 S1S2	None None		160 160	5 S:1	0	0	0	0	0	1	1	0	1	0	0	
Ardea herodias great blue heron	G5 S4	None None	CDF_S-Sensitive IUCN_LC-Least Concern	150 150	134 S:1	1	0	0	0	0	0	1	0	1	0	0	
Athene cunicularia burrowing owl	G4 S3	None None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	45 130	1875 S:4	1	2	0	0	0	1	0	4	4	0	0	
Balsamorhiza macrolepis big-scale balsamroot	G2 S2	None None	Rare Plant Rank - 1B.2 BLM_S-Sensitive USFS_S-Sensitive	125 600	43 S:3	0	0	0	0	1	2	3	0	2	1	0	
Branchinecta conservatio Conservancy fairy shrimp	G1 S1	Endangered None	IUCN_EN-Endangered	100 100	42 S:1	0	1	0	0	0	0	0	1	1	0	0	
Branchinecta lynchi vernal pool fairy shrimp	G3 S3	Threatened None	IUCN_VU-Vulnerable	48 320	751 S:62	8	16	6	0	1	31	4	58	61	0	1	

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Information Expires 5/3/2016



Summary Table Report California Department of Fish and Wildlife



California Natural Diversity Database

				Elev.		Element Occ. Ranks		Populatio	on Status	Presence						
Name (Scientific/Common)	CNDDB Ranks	Listing Status (Fed/State)	Other Lists	Range (ft.)	Total EO's	А	в	0 0	D	x	U	Historic > 20 yr	Recent <= 20 yr	Extant	Poss. Extirp.	Extirp.
Buteo swainsoni Swainson's hawk	G5 S3	None Threatened	BLM_S-Sensitive IUCN_LC-Least Concern USFWS_BCC-Birds of Conservation Concern	40 145	2394 S:18	4	4	0	0	1	9	0	18	17	1	0
Chloropyron molle ssp. hispidum hispid salty bird's-beak	G2T2 S2	None None	Rare Plant Rank - 1B.1 BLM_S-Sensitive	150 150	35 S:1	0	1	0	0	0	0	0	1	1	0	0
Clarkia biloba ssp. brandegeeae Brandegee's clarkia	G4G5T4 S4	None None	Rare Plant Rank - 4.2 BLM_S-Sensitive	471 1,000	89 S:7	0	3	0	0	0	4	3	4	7	0	0
Corynorhinus townsendii Townsend's big-eared bat	G3G4 S2	None Candidate Threatened	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern USFS_S-Sensitive WBWG_H-High Priority	725 725	619 S:1	0	0	0	0	0	1	0	1	1	0	0
Desmocerus californicus dimorphus valley elderberry longhorn beetle	G3T2 S2	Threatened None		80 640	271 S:12	4	1	1	1	1	4	4	8	11	1	0
Downingia pusilla dwarf downingia	GU S2	None None	Rare Plant Rank - 2B.2	60 210	127 S:21	2	11	2	2	3	1	9	12	18	1	2
Elanus leucurus white-tailed kite	G5 S3S4	None None	BLM_S-Sensitive CDFW_FP-Fully Protected IUCN_LC-Least Concern	125 400	158 S:2	0	2	0	0	0	0	0	2	2	0	0
Emys marmorata western pond turtle	G3G4 S3	None None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_VU-Vulnerable USFS_S-Sensitive	270 500	1146 S:4	1	2	0	0	0	1	1	3	4	0	0
Fritillaria agrestis stinkbells	G3 S3	None None	Rare Plant Rank - 4.2	130 130	32 S:1	0	0	0	0	1	0	1	0	0	1	0
Fritillaria eastwoodiae Butte County fritillary	G3Q S3	None None	Rare Plant Rank - 3.2 USFS_S-Sensitive	900 900	235 S:1	0	0	0	0	0	1	1	0	1	0	0
Gratiola heterosepala Boggs Lake hedge-hyssop	G2 S2	None Endangered	Rare Plant Rank - 1B.2 BLM_S-Sensitive	88 290	94 S:4	0	2	1	0	1	0	3	1	3	0	1

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Summary Table Report

California Department of Fish and Wildlife California Natural Diversity Database



				Elev.		Element Occ. Ranks		i	Populatio	on Status	Presence					
Name (Scientific/Common)	CNDDB Ranks	Listing Status (Fed/State)	Other Lists	Range (ft.)	Total EO's	А	в	с	D	x	U	Historic > 20 yr	Recent <= 20 yr	Extant	Poss. Extirp.	Extirp.
Hydrochara rickseckeri Ricksecker's water scavenger beetle	G2? S2?	None None		140 140	13 S:1	0	0	0	0	0	1	1	0	1	0	0
Juncus leiospermus var. ahartii Ahart's dwarf rush	G2T1 S1	None None	Rare Plant Rank - 1B.2	135 135	13 S:1	0	0	1	0	0	0	1	0	1	0	0
Juncus leiospermus var. leiospermus Red Bluff dwarf rush	G2T2 S2	None None	Rare Plant Rank - 1B.1 BLM_S-Sensitive USFS_S-Sensitive	110 110	56 S:1	0	0	0	0	0	1	1	0	1	0	0
Laterallus jamaicensis coturniculus California black rail	G3G4T1 S1	None Threatened	BLM_S-Sensitive CDFW_FP-Fully Protected IUCN_NT-Near Threatened NABCI_RWL-Red Watch List USFWS_BCC-Birds of Conservation Concern	360 480	241 S:2	1	0	0	0	0	1	0	2	2	0	0
Legenere limosa legenere	G2 S2	None None	Rare Plant Rank - 1B.1 BLM_S-Sensitive	118 150	78 S:3	0	1	0	0	1	1	2	1	2	0	1
Lepidurus packardi vernal pool tadpole shrimp	G3 S2S3	Endangered None	IUCN_EN-Endangered	90 140	316 S:3	1	0	0	0	1	1	1	2	2	1	0
Linderiella occidentalis California linderiella	G2G3 S2S3	None None	IUCN_NT-Near Threatened	45 520	425 S:42	1	7	2	0	0	32	8	34	42	0	0
Margaritifera falcata western pearlshell	G4G5 S1S2	None None		965 965	74 S:1	0	0	0	0	0	1	0	1	1	0	0
Melospiza melodia song sparrow ("Modesto" population)	G5 S3?	None None	CDFW_SSC-Species of Special Concern	120 120	92 S:1	0	0	0	0	0	1	0	1	1	0	0
Navarretia myersii ssp. myersii pincushion navarretia	G1T1 S1	None None	Rare Plant Rank - 1B.1	160 160	14 S:1	0	0	0	0	0	1	1	0	1	0	0
Northern Hardpan Vernal Pool Northern Hardpan Vernal Pool	G3 S3.1	None None		110 250	126 S:6	0	0	0	0	0	6	6	0	6	0	0
Northern Volcanic Mud Flow Vernal Pool Northern Volcanic Mud Flow Vernal Pool	G1 S1.1	None None		165 400	7 S:5	0	0	0	0	0	5	5	0	5	0	0

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APPENDIX F - BIOLOGICAL RESOURCES ASSESSMENT AND MAY 5, 2016 AND AUGUST 25, 2016 LETTERS



Summary Table Report

California Department of Fish and Wildlife California Natural Diversity Database



				Elev.		E	Elem	ent O)cc. F	Ranks	5	Populatio	on Status		Presence	
Name (Scientific/Common)	CNDDB Ranks	Listing Status (Fed/State)	Other Lists	Range (ft.)	Total EO's	А	в	с	D	x	U	Historic > 20 yr	Recent <= 20 yr	Extant	Poss. Extirp.	Extirp.
Pandion haliaetus osprey	G5 S4	None None	CDF_S-Sensitive CDFW_WL-Watch List IUCN_LC-Least Concern	575 575	482 S:1	0	0	1	0	0	0	0	1	1	0	0
Progne subis purple martin	G5 S3	None None	CDFW_SSC-Species of Special Concern IUCN_LC-Least Concern	216 216	61 S:1	0	1	0	0	0	0	0	1	1	0	0
Rana boylii foothill yellow-legged frog	G3 S3	None None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_NT-Near Threatened USFS_S-Sensitive	650 920	810 S:6		4	0	0	0	1	0	6	6	0	. 0
Riparia riparia bank swallow	G5 S2	None Threatened	BLM_S-Sensitive IUCN_LC-Least Concern	114 114	296 S:1	0	0	0	0	0	1	0	1	1	0	0
Sagittaria sanfordii Sanford's arrowhead	G3 S3	None None	Rare Plant Rank - 1B.2 BLM_S-Sensitive	150 150	93 S:1	0	1	0	0	0	0	0	1	1	0	0
Spea hammondii western spadefoot	G3 S3	None None	BLM_S-Sensitive CDFW_SSC-Species of Special Concern IUCN_NT-Near Threatened	95 200	425 S:5		1	0	2	0	2	4	1	5	0	0

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United States Department of the Interior

FISH AND WILDLIFE SERVICE Sacramento Fish and Wildlife Office FEDERAL BUILDING, 2800 COTTAGE WAY, ROOM W-2605 SACRAMENTO, CA 95825 PHONE: (916)414-6600 FAX: (916)414-6713



Consultation Code: 08ESMF00-2016-SLI-0244 Event Code: 08ESMF00-2016-E-00484 Project Name: Rocklin Manor Apartments November 06, 2015

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2)

of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan

(http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and

http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

The table below outlines lead FWS field offices by county and land ownership/project type. Please refer to this table when you are ready to coordinate (including requests for section 7 consultation) with the field office corresponding to your project, and send any documentation regarding your project to that corresponding office. Therefore, the lead FWS field office may not be the office listed above in the letterhead. Please visit our office's website (http://www.fws.gov/sacramento) to view a map of office jurisdictions.

County	Ownership/Program	Species	Office Lead*
Alameda	Tidal wetlands/marsh adjacent to Bays	Salt marsh species, delta smelt	BDFWO
Alameda	All ownerships but tidal/estuarine	A11	SFWO
Alpine	Humboldt Toiyabe National Forest	A11	RFWO
Alpine	Lake Tahoe Basin Management Unit	A11	RFWO
Alpine	Stanislaus National Forest	A11	SFWO
Alpine	El Dorado National Forest	A11	SFWO
Colusa	Mendocino National Forest	A11	AFWO
Colusa	Other	A11	By jurisdiction (see map)
Contra Costa	Legal Delta (Excluding ECCHCP)	A11	BDFWO
Contra Costa	Antioch Dunes NWR	A11	BDFWO
Contra Costa	Tidal wetlands/marsh adjacent to Bays	Salt marsh species, delta smelt	BDFWO
Contra Costa	All ownerships but tidal/estuarine	A11	SFWO

Lead FWS offices by County and Ownership/Program

3

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El Dorado	El Dorado National Forest	A11	SFWO
El Dorado	LakeTahoe Basin Management Unit		RFWO
Glenn	Mendocino National Forest	A11	AFWO
Glenn	Other	All	By jurisdiction (see map)
Lake	Mendocino National Forest	A11	AFWO
Lake	Other	All	By jurisdiction (see map)
Lassen	Modoc National Forest	A11	KFWO
Lassen	Lassen National Forest	A11	SFWO
Lassen	Toiyabe National Forest	A11	RFWO
Lassen	BLM Surprise and Eagle Lake Resource Areas	A11	RFWO
Lassen	BLM Alturas Resource Area	A11	KFWO
Lassen	Lassen Volcanic National Park	All (includes Eagle Lake trout on all ownerships)	SFWO
Lassen	All other ownerships	All	By jurisdiction (see map)

Marin	Tidal wetlands/marsh adjacent to Bays	Salt marsh species, delta smelt	BDFWO
Marin	All ownerships but tidal/estuarine	A11	SFWO
Mendocino	Russian River watershed	A11	SFWO
Mendocino	All except Russian River watershed	A11	AFWO
Napa	All ownerships but tidal/estuarine	A11	SFWO
Napa	Tidal wetlands/marsh adjacent to San Pablo Bay	Salt marsh species, delta smelt	BDFWO
Nevada	Humboldt Toiyabe National Forest	A11	RFWO
Nevada	All other ownerships	A11	By jurisdiction (See map)
Placer	Lake Tahoe Basin Management Unit	A11	RFWO
Placer	All other ownerships	A11	SFWO
Sacramento	Legal Delta	Delta Smelt	BDFWO
Sacramento	Other	A11	By jurisdiction (see map)
San Francisco	Tidal wetlands/marsh adjacent to San Francisco Bay	Salt marsh species, delta smelt	BDFWO

San Francisco	All ownerships but tidal/estuarine	A11	SFWO
San Mateo	Tidal wetlands/marsh adjacent to San Francisco Bay	Salt marsh species, delta smelt	BDFWO
San Mateo	All ownerships but tidal/estuarine	A11	SFWO
San Joaquin	Legal Delta excluding San Joaquin HCP	A11	BDFWO
San Joaquin	Other	A11	SFWO
Santa Clara	Tidal wetlands/marsh adjacent to San Francisco Bay	Salt marsh species, delta smelt	BDFWO
Santa Clara	All ownerships but tidal/estuarine	A11	SFWO
Shasta	Shasta Trinity National Forest except Hat Creek Ranger District (administered by Lassen National Forest)	All	YFWO
Shasta	Hat Creek Ranger District	A11	SFWO
Shasta	Bureau of Reclamation (Central Valley Project)	A11	BDFWO
Shasta	Whiskeytown National Recreation Area	A11	YFWO
Shasta	BLM Alturas Resource Area	A11	KFWO

Shasta	Caltrans	By jurisdiction	SFWO/AFWO
Shasta	Ahjumawi Lava Springs State Park	Shasta crayfish	SFWO
Shasta	All other ownerships	A11	By jurisdiction (see map)
Shasta	Natural Resource Damage Assessment, all lands	A11	SFWO/BDFWO
Sierra	Humboldt Toiyabe National Forest	A11	RFWO
Sierra	All other ownerships	A11	SFWO
Solano	Suisun Marsh	A11	BDFWO
Solano	Tidal wetlands/marsh adjacent to San Pablo Bay	Salt marsh species, delta smelt	BDFWO
Solano	All ownerships but tidal/estuarine	All	SFWO
Solano	Other	A11	By jurisdiction (see map)
Sonoma	Tidal wetlands/marsh adjacent to San Pablo Bay	Salt marsh species, delta smelt	BDFWO
Sonoma	All ownerships but tidal/estuarine	A11	SFWO
Tehama	Mendocino National Forest	A11	AFWO
	Shasta Trinity National Forest		

Tehama	except Hat Creek Ranger District (administered by Lassen National Forest)	A11	YFWO
Tehama	All other ownerships	A11	By jurisdiction (see map)
Yolo	Yolo Bypass	A11	BDFWO
Yolo	Other	A11	By jurisdiction (see map)
All	FERC-ESA	A11	By jurisdiction (see map)
All	FERC-ESA	Shasta crayfish	SFWO
All	FERC-Relicensing (non-ESA)	A11	BDFWO
*Office Leads:			
AFWO=Arcata Fisl	a and Wildlife Office		
BDFWO=Bay Delta	Fish and Wildlife Office		
KFWO=Klamath F	alls Fish and Wildlife Office		
RFWO=Reno Fish :	and Wildlife Office		
YFWO=Yreka Fish	and Wildlife Office		

Attachment



Project name: Rocklin Manor Apartments

Official Species List

Provided by:

Sacramento Fish and Wildlife Office FEDERAL BUILDING 2800 COTTAGE WAY, ROOM W-2605 SACRAMENTO, CA 95825 (916) 414-6600

Consultation Code: 08ESMF00-2016-SLI-0244 Event Code: 08ESMF00-2016-E-00484

Project Type: DEVELOPMENT

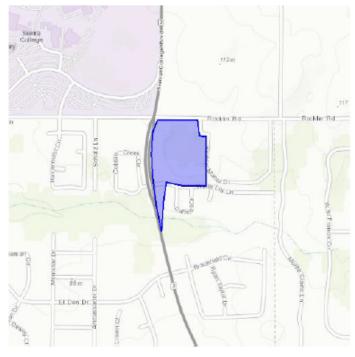
Project Name: Rocklin Manor Apartments

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



Project name: Rocklin Manor Apartments

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-121.20433688163756 38.78807774637309, -121.20406866073608 38.788052658004794, -121.20406866073608 38.78662260641751, -121.20492696762085 38.78661424345838, -121.20561361312865 38.786714598903345, -121.20571017265321 38.7866120827132585, -121.20579600334167 38.78525943112542, -121.20598912239076 38.78604555993527, -121.20613932609557 38.78686513180595, -121.20617151260376 38.787534163083194, -121.20612859725952 38.78819482530843, -121.20595693588257 38.788546060960805, -121.20441198348998 38.788546060960805, -121.20433688163756 38.78807774637309)))

Project Counties: Placer, CA

http://ecos.fws.gov/ipac, 11/06/2015 12:38 PM 2



Project name: Rocklin Manor Apartments

Endangered Species Act Species List

There are a total of 7 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the Has Critical Habitat column may or may not lie within your project area. See the Critical habitats within your project area section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

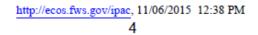
Amphibians	Status	Has Critical Habitat	Condition(s)
California red-legged frog (Rana draytonii) Population: Entire	Threatened	Final designated	
Crustaceans			
Vernal Pool fairy shrimp (Branchinecta lynchi) Population: Entire	Threatened	Final designated	
Vernal Pool tadpole shrimp (<i>Lepidurus packardi</i>) Population: Entire	Endangered	Final designated	
Fishes	•	•	
Delta smelt (Hypomesus transpacificus) Population: Entire	Threatened	Final designated	
steelhead (Oncorhynchus (=salmo) mykiss) Population: Northern California DPS	Threatened	Final designated	
Insects			

http://ecos.fws.gov/ipac, 11/06/2015 12:38 PM 3



Project name: Rocklin Manor Apartments

Valley Elderberry Longhorn beetle (Desmocerus californicus dimorphus) Population: Entire	Threatened	Final designated	
Reptiles	1	1	
Giant Garter snake (Thamnophis gigas) Population: Entire	Threatened		





Project name: Rocklin Manor Apartments

Critical habitats that lie within your project area

There are no critical habitats within your project area.

http://ecos.fws.gov/ipac, 11/06/2015 12:38 PM 5

Appendix B

List of Plants Observed

Common Name	Taxon	Wetland Status
Annual beard grass	Polypogon monspeliensis	FACW+
Arroyo willow	Salix lasiolepis lasiolepis	FACW
Blue oak	Quercus douglasii	21
Broad-leaf filaree	Erodium botrys	-
Buck brush	Ceanothus cuneatus cuneatus	ST 5
California poppy	Eschscholzia californica	×
Cattail	Typha sp.	OBL
Chicory	Cichorium intybus	
Clarkia	Clarkia sp.	*
Common chickweed	Stellaria media	FACU
Common fiddlneck	Amsinckia menziesii	× .
Coyote brush	Baccharis pilularis	-
Crane's-bill geranium	Geranium molle	÷ 1
Curly dock	Rumex crispus	FACW-
English plantain	Plantago lanceolata	FAC-
Fiddle dock	Rumex pulcher	FAC+
Poothill pine	Pinus sabiniana	,
Foxtail barley	Hordeum murinum leporinum	NI
Fremont cottonwood	Populus fremontii fremontii	FACW
Goose grass	Galium aparine	FACU
Hairy vetch	Vicia villosa	
ledgehog dogtail	Cynosurus echinatus	-
limalayan blackberry	Rubus discolor	FACW*
Horehound	Marrubium vulgare	FAC
Horseweed	Conyza canadensis	FAC
nterior live oak	Quercus wislizeni	÷
talian ryegrass	Lolium multiflorum	FAC*
talian thistle	Carduus pycnocephalus	-
thuriel's spear	Triteleia laxa	2
Cnotted hedge parsley	Torilis nodosa	-
Aexican tea	Chenopodium ambrosioides	FAC
finer's lettuce	Claytonia perfoliata	FAC
Ainiature lupine	Lupinus bicolor	-
Dak mistletoe	Phoradendron villosum	8
Dracle oak	Quercus morehus	-
Red willow	Salix laevigata	FACW+
Ripgut grass	Bromus diandrus	
Rose clover	Trifolium hirtum	-

Appendix B

Common Name	Taxon	Wetland Status	
Short-podded mustard	Hirschfeldia incana	(C)	
Six-weeks brome grass	Vulpia bromoides	FACW	
Smooth cat's-ear	Hypochaeris glabra	23	
Soap plant	Chlorogalum pomeridianum pomeridi		
Soft chess	Bromus hordeaceus	FACU-	
Summer cottonweed	Epilobium brachycarpum	121	
Tall flatsedge	Cyperus eragrostis	FACW	
Telegraph weed	Heterotheca grandiflora	(T)	
Valley oak	Quercus lobata	FAC*	
Western poison-oak	Toxicodendron diversilobum	20	
Yellow star-thistle	Centaurea solstitialis	·	



853 LINCOLN WAY, SUITE #208 AUBURN, CALIFORNIA 95603 T 530.887.8500 F 530.885.8372

MEMORANDUM

To:	David Mohlenbrok
From:	Kevin Derby, Senior Biologist
Subject:	Response to Citizens Voice Organization EIR Comments
Date:	May 5, 2016
cc:	Scott Robertson, Omni-Means

This memorandum is in response to a comment submitted by the Citizens Voice Organization on April 22, 2016. Specifically, this is a response to comment letter section C, comment #2: Biological Resources (Trees, Wildlife) on page 4 of the letter, and will focus on the comment regarding the chain link fence around a portion of the property:

Comment: In addition, the existing fence should be removed for at least 3 months to establish an accurate baseline of the biological resources and wildlife on the property. The chain link construction fencing violates the City's Municipal Code and has been a barrier to wildlife that normally use that wooded property.

Answer: The chain link fence was erected on August 7, 2015 as security measure in anticipation of construction. The original biological surveys and resource assessment report were prepared by Northfork Associates in January, 2005. Recent biological field assessment surveys were conducted in November, 2013 by Dudek. The entire site was surveyed and observations about plants, animals and habitat characteristics were recorded. In spring 2015, Dudek conducted a general site survey and confirmed that conditions had not changed since 2013. Dudek also conducted western pond turtle and nesting bird surveys in early August, 2015 in anticipation of the start of construction, and prior to installation of the fence. However, regardless of the presence of the fence, the portion of the property that was fenced was not considered an important wildlife corridor. While the fence may discourage local use and foraging by terrestrial wildlife adapted to proximity to human activity, it does not impact a movement corridor. The more important movement corridor is the intermittent tributary to Secret Ravine (although interrupted by Sierra College), which is not fenced and is actually closer to an existing single-family housing development than it is to the proposed project.

WWW.DUDEK.COM

Memorandum Subject: Sierra Gateway Apartments – Response to EIR Comments (Biological Resources)

All other biological resources comments/questions included in the Citizens Voice Organization comment letter were specifically addressed in the technical biological resources assessments prepared by North Fork Associates and Dudek in 2005, 2013, and 2015.

A B

Kevin Derby Senior Biologist DUDEK

DUDEK

8866 January 2016

DUDEK

853 LINCOLN WAY, SUITE #208 AUBURN, CALIFORNIA 95603 T 530.887.8500 F 530.885.8372

August 25, 2016

David Mohlenbrok Environmental Services Operations Manager Public Services Department, City of Rocklin 4081 Alvis Court, | Rocklin, CA

Cc: Mr. Scott Robertson, Omni-Means

Subject: Brandegee's Clarkia Status- Rocklin Manor Apartments

Dear Mr. Mohlenbrok:

This letter is to notify you of the change in status of Brandegee's clarkia (*Clarkia biloba* ssp. *brandegeeae*) and the resulting implications for the Rocklin Manor Apartments Project.

Brandegee's clarkia has been reassigned from the California Native Plan Societies' (CNPS) I.B. list, to CNPS 4 list. Under the California Environmental Quality Act (CEQA) it is common practice by Lead Agencies to require focused surveys for plant species on CNPS I.B. However, CNPS list 4 species rarely, if ever require focused surveys as regulatory agencies do not generally require or request them under CEQA and they fall below the Levels of Significance established by most Lead Agencies. As such, any previous requirement to perform focused surveys or other mitigation for this species based on its CNPS I.B. status would no longer apply. Any surveys for this species would be at the discretion of the City and you Levels of Significance pertaining to floristic resources listed as CNPS 4 species under CEQA.

If you have any questions or require additional information, please do not hesitate to contact me at 818.640.2487 or jspranza@dudek.com.

Sincerely,

John Spranza, II Principal Ecologist Dudek Cell: 818.640.2487 Office: 530.863.4658 jspranza@dudek.com