COUNTY OF MENDOCINO
DEPARTMENT OF PLANNING AND BUILDING SERVICES
860 NORTH BUSH STREET · UKIAH · CALIFORNIA · 95482
752 SOUTH FRANKLIN STREET · FT. BRAGG · CALIFORNIA · 95437

JULIA KROG, DIRECTOR
TELEPHONE: 707-234-6650
FAX: 707-463-5709
FB PHONE: 707-964-5379
FB FAX: 707-961-2427
pbs@mendocinocounty.gov
www.mendocinocounty.org/pbs

October 28, 2025

Planning – Fort Bragg
Department of Transportation
Environmental Health - Fort Bragg
Building Inspection - Fort Bragg
Assessor
Air Quality Management
Mendocino County Farm Bureau
Sonoma State University
Department of Forestry/ CalFire
-Land Management
Department of Fish and Wildlife
California Coastal Commission
Regional Water Quality Control Board
County Addresser
Cloverdale Rancheria
Cahto Tribe
Potter Valley Tribe
Redwood Valley Rancheria
Sherwood Valley Band of Pomo Indians
Round Valley Tribe
Mendocino Fire District

CASE#: CDP_2025-0020
DATE FILED: 9/9/2025
OWNER/APPLICANT: David Deaton
AGENT: Sunny Chancelor, Aum Construction
REQUEST: Standard Coastal Development Permit for an after-the-fact relocation of an accessory dwelling unit. In addition, the project proposes to renovate an existing single-family residence including expanding an attached deck and parking area.
LOCATION: In the Coastal Zone, 0.8± miles northeast of the Mendocino town center, 0.36± miles east of the intersection of Raven Lane (private) and Larkin Road (CR 443), located at 44650 Raven Lane, Mendocino (APN:119-040-37).
SUPERVISORIAL DISTRICT: 5
STAFF PLANNER: Shelby Miller
RESPONSE DUE DATE: November 11, 2025

PROJECT INFORMATION CAN BE FOUND AT:
www.mendocinocounty.org
Select "Government" from the drop-down; then locate Planning and Building Services/Public Agency Referrals.

Mendocino County Planning & Building Services is soliciting your input, which will be used in staff analysis and forwarded to the appropriate public hearing. You are invited to comment on any aspect of the proposed project(s). Please convey any requirements or conditions your agency requires for project compliance to the project coordinator at the above address, or submit your comments by email to pbs@mendocinocounty.org. Please note the case number and name of the project coordinator with all correspondence to this department.

We have reviewed the above application and recommend the following (please check one):

☐ No comment at this time.

☐ Recommend conditional approval (attached).

☐ Applicant to submit additional information (attach items needed, or contact the applicant directly, copying Planning and Building Services in any correspondence you may have with the applicant)

☐ Recommend denial (Attach reasons for recommending denial).

☐ Recommend preparation of an Environmental Impact Report (attach reasons why an EIR should be required).

☐ Other comments (attach as necessary).

REVIEWED BY:

Signature _____ Department _____ Date _____

CASE: CDP_2025-0020

OWNER
APPLICANT: David Deaton

AGENT: Sunny Chancelor, Aum Construction

REQUEST: Standard Coastal Development Permit for an after-the-fact relocation of an accessory dwelling unit. In addition, the project proposes to install a berm, renovate an existing single-family residence including expanding an attached deck and parking area.

LOCATION: In the Coastal Zone, 0.8± miles northeast of the Mendocino town center, 0.36± miles east of the intersection of Raven Lane (private) and Larkin Road (CR 443), located at 44650 Raven Lane, Mendocino (APN:119-040-37).

APN: 119-040-37

PARCEL SIZE: 5± Acres

GENERAL PLAN: Rural Residential (RR5)

ZONING: Rural Residential (RR:5)

EXISTING USES: Residential

DISTRICT: 5 (Williams)

RELATED CASES:

REFERRAL AGENCIES

LOCAL
☒ Air Quality Management District
☒ Assessor's Office
☒ Building Division Fort Bragg (FB)
☒ County Addresser
☒ Department of Transportation (DOT)
☒ Environmental Health (EH)
☒ Mendocino Fire Protection District
☒ Planning Division FB
☒ Sonoma State University
☒ Mendocino County Farm Bureau

STATE
☒ CALFIRE (Resource Management)
☒ California Coastal Commission
☒ California Dept. of Fish & Wildlife
☒ Regional Water Quality Control Board

TRIBAL
☒ Cloverdale Rancheria
☒ Cahto tribe
☒ Potter Valley Tribe
☒ Redwood Valley Rancheria
☒ Sherwood Valley Band of Pomo Indians
☒ Round Valley Tribe

ADDITIONAL INFORMATION: The Biological Scoping Survey and Botanical Survey prepared by Graening and Associates, LLC on January 28, 2025 (last attachment), was prepared for the adjacent parcel to the west. The after-the-fact ADU was relocated from this parcel to the subject parcel.

STAFF PLANNER: SHELBY MILLER **DATE:** 10/28/2025

ENVIRONMENTAL DATA

1. MAC:
GIS
N/A

2. FIRE HAZARD SEVERITY ZONE:
CALFIRE FRAP maps/GIS
HIGH

3. FIRE RESPONSIBILITY AREA:
CALFIRE FRAP maps/GIS
STATE

4. FARMLAND CLASSIFICATION:
GIS
Rural Residential/ Rural Commercial

5. FLOOD ZONE CLASSIFICATION:
FEMA Flood Insurance Rate Maps (FIRM)
NO

6. COASTAL GROUNDWATER RESOURCE AREA:
Coastal Groundwater Study/GIS
CRITICAL

7. SOIL CLASSIFICATION:
Mendocino County Soils Study Eastern/Western Part
Shinglemill-Gibney complex, 2 to 9 percent slopes

8. PYGMY VEGETATION OR PYGMY CAPABLE SOIL:
LCP maps, Pygmy Soils Maps; GIS
No

9. WILLIAMSON ACT CONTRACT:
GIS/Mendocino County Assessor's Office
NO

10. TIMBER PRODUCTION ZONE:
GIS
NO

11. WETLANDS CLASSIFICATION:
GIS
Two (2) Freshwater Forested/ Shrub Wetlands and one Freshwater Pond on subject parcel.

12. EARTHQUAKE FAULT ZONE:
Earthquake Fault Zone Maps; GIS
NO

13. AIRPORT LAND USE PLANNING AREA:
Airport Land Use Plan; GIS
NO

14. SUPERFUND/BROWNFIELD/HAZMAT SITE:
GIS; General Plan 3-11
NO

15. NATURAL DIVERSITY DATABASE:
CA Dept. of Fish & Wildlife Rarefind Database/GIS
YES

16. STATE FOREST/PARK/RECREATION AREA ADJACENT:
GIS; General Plan 3-10
N/A

17. LANDSLIDE HAZARD:
Hazards and Landslides Map; GIS; Policy RM-61; General Plan 4-44
No

18. WATER EFFICIENT LANDSCAPE REQUIRED:
Policy RM-7; General Plan 4-34
N/A

19. WILD AND SCENIC RIVER:
www.rivers.gov (Eel Only); GIS
No

20. SPECIFIC PLAN/SPECIAL PLAN AREA:
Various Adopted Specific Plan Areas; GIS

21. STATE CLEARINGHOUSE REQUIRED:
Policy
Yes

22. OAK WOODLAND AREA:
USDA
N/A

23. HARBOR DISTRICT:
Sec. 20.512
No

FOR PROJECTS WITHIN THE COASTAL ZONE ONLY

24. LCP LAND USE CLASSIFICATION:
LCP Land Use maps/GIS
N/A

25. LCP LAND CAPABILITIES & NATURAL HAZARDS:
LCP Land Capabilities maps/GIS; 20.500
Beach Deposits and Stream Alluvium and Terraces (Zone 3) – Intermediate Shaking

26. LCP HABITATS & RESOURCES:
LCP Habitat maps/GIS; 20.496
Coastal Prairie Grassland/ Hardwood Forest/ Grassland

27. COASTAL COMMISSION APPEALABLE AREA:
Post LCP Certification Permit and Appeal Jurisdiction maps/GIS; 20.544
Appealable Area

28. CDP EXCLUSION ZONE:
CDP Exclusion Zone maps/GIS
YES

29. HIGHLY SCENIC AREA:
Highly Scenic & Tree Removal Area Maps/GIS; Secs. 20.504.015, 20.504.020
NO

30. BIOLOGICAL RESOURCES & NATURAL AREAS:
Biological Resources & Natural Area Map; GIS; General Plan 4-9
Yes

31. BLUFFTOP GEOLOGY:
GIS; 20.500.020
No

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FORT BRAGG, CA 95437
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www.mendocinocounty.gov/planning

Case No(s)	CDP_2025-0020 Deaton
CDF No(s)	TBD
Date Filed	09/09/2025
Fee	$15,383.00 (X2 BV)
Receipt No.	PRJ_068275
Received by	Sandy Arellano, Planner

Office Use Only

COASTAL ZONE APPLICATION FORM

APPLICANT

Name: David Deaton
Mailing Address: 44650 Raven Lane Email: ddeaton@omm.com
City: Mendocino State: CA Zip Code: 95460 Phone: 562-533-2763

PROPERTY OWNER

Name: David Deaton
Mailing Address: 44650 Raven Lane Email: ddeaton@omm.com
City: Mendocino State: CA Zip Code: 95460 Phone: 562-533-2763

AGENT

Name: AUM Construction Inc. - c/o Sunny Chancellor
Mailing Address: PoBox 1033 Email: sunny@aumconstruction.com
City: Mendocino State: CA Zip Code: 95460 Phone: 7070-357-6595

PARCEL SIZE

5.02 ☐ Square feet ■ Acres

STREET ADDRESS OF PROJECT

44650 Raven Lane

ASSESSOR'S PARCEL NUMBER(S)

119-04-037-00

I certify that the information submitted with this application is true and accurate.

Signature of Applicant/Agent — Date: 9/9/2025
Signature of Owner — Date: Sept 9, 2025

COASTAL ZONE - SITE AND PROJECT DESCRIPTION QUESTIONNAIRE

The purpose of this questionnaire is to relate information concerning your application to the Planning and Building Services Department and other agencies who will be reviewing your project proposal. Please remember that the clearer picture that your give us of your project and the site, the easier it will be to promptly process your application. Please answer all questions. Those questions which do not pertain to your project, please indicate "Not Applicable" or "N/A".

THE PROJECT

1. Describe your project and include secondary improvements such as wells, septic systems, grading, vegetation removal, roads, etc.

- Renovate Existing Primary Residence
- Expand Parking Area at Primary Residence
- Permit Existing Class K Structure as an ADU
- Install Mitigation Measures for ADU as per Biological Report re: Graening & Associates, LLC

2. If the project is residential, please complete the following:

TYPE OF UNIT		NUMBER OF STRUCTURES	SQUARE FEET PER DWELLING UNIT
[X]	Single Family	2	ADU- 704 sq ft / Residence - 4214 sq ft
[ ]	Mobile Home		
[ ]	Duplex		
[ ]	Multifamily		

If Multifamily, number of dwelling units per building:_____

3. If the project is commercial, industrial, or institutional, complete the following:

Total square footage of structures: _____
Estimated employees per shift: _____
Estimated shifts per day: _____
Type of loading facilities proposed: _____

4. Will the proposed project be phased? [ ] Yes [■] No
If Yes, explain your plans for phasing.

5. Are there existing structures on the property? ■ Yes ☐ No
If yes, describe below and identify the use of each structure on the plot plan.

- Primary Residence: Existing and will be Renovated, with some covered areas enclosed and Deck Expanded

- ADU, Class K: Existing and no Change. Berm to be Created as per Biological Report

6. Will any existing structures be demolished? ☐ Yes ■ No
Will any existing structures be removed? ☐ Yes ■ No

If yes to either question, describe the type of development to be demolished or removed, including the relocation site, if applicable.

7. Project Height. Maximum height of structure 25' 2" feet.

8. Lot area (within property lines): 5.02 ☐ square feet ■ acres

9. Lot Coverage:

	EXISTING	NEW PROPOSED	TOTAL
Building coverage	5980 square feet	636 square feet	6616 square feet
Paved area	3355 square feet	1228 square feet	4583 square feet
Landscaped area	5683 square feet	448 square feet	6131 square feet
Unimproved area	203,653 square feet	2312 square feet	201,341 square feet

GRAND TOTAL: 218,671 square feet
(Should equal gross area of parcel)

10. Gross floor area: square feet (including covered parking and accessory buildings).

11. Parking will be provided as follows:

Number of Spaces Existing 4 Proposed 4 Total 4

Number of covered spaces	1	Size
Number of uncovered spaces	3	Size
Number of standard spaces		Size
Number of handicapped spaces		Size

12. Utilities will be supplied to the site as follows:

A. Electricity
- [x] Utility Company (service exists to the parcel).
- [ ] Utility Company (requires extension of services to site: _____feet _____miles
- [ ] On Site generation, Specify: _____
- [ ] None

B. Gas
- [x] Utility Company/Tank
- [ ] On Site generation, Specify: _____
- [ ] None

C. Telephone: [x] Yes [ ] No

13. Will there by any exterior lighting? [x] Yes [ ] No
If yes, describe below and identify the location of all exterior lighting on the plot plan and building plans.

14. What will be the method of sewage disposal?

- [ ] Community sewage system, specify supplier _____
- [x] Septic Tank
- [ ] Other, specify _____

15. What will be the domestic water source?

- [ ] Community water system, specify supplier _____
- [x] Well
- [ ] Spring
- [ ] Other, specify _____

16. Is any grading or road construction planned? [x] Yes [ ] No
If yes, grading and drainage plans may be required. Also, describe the terrain to be traversed (e.g., steep, moderate slope, flat, etc.).

Moderate slope at existing parking to be cut into for expanded parking area with new stone retaining wall
Moderately flat slope at West deck to be filled to level under new Deck Expansion with new Stone retaining wall

For grading and road construction, complete the following:

A. Amount of cut: 37 cubic yards
B. Amount of fill: 15 cubic yards
C. Maximum height of fill slope: 1 feet
D. Maximum height of cut slope: 2 feet
E. Amount of import or export: 0 cubic yards
F. Location of borrow or disposal site: Burm at Backside of ADU as per Biological

17. Will vegetation be removed on areas other than the building sites and roads? ☐ Yes ■ No
If yes, explain:

18. Does the project involve sand removal, mining or gravel extraction? ☐ Yes ■ No
If yes, detailed extraction, reclamation and monitoring may be required.

19. Will the proposed development convert land currently or previously used for agriculture to another use? ☐ Yes ■ No
If yes, how many acres will be converted? _____acres (An agricultural economic feasibility study may be required.)

20. Will the development provide public or private recreational opportunities? ☐ Yes ■ No
If yes, explain:

21. Is the proposed development visible from:

A. State Highway 1 or other scenic route? ☐ Yes ■ No
B. Park, beach or recreation area? ☐ Yes ☒ No

22. Will the project involve the use or disposal of potentially hazardous materials such as toxic substances, flammables, or explosives? ☐ Yes ■ No
If yes, explain:

23. Does the development involve diking, filling, dredging or placing structures in open coastal waters, wetlands, estuaries or lakes?

A. Diking ☐ Yes ■ No
B. Filling ☐ Yes ☒ No
C. Dredging ☐ Yes ☒ No
D. Placement of structures in open coastal waters, wetlands, estuaries or lakes ☐ Yes ☐ No

Amount of material to be dredged or filled? _____cubic yards.

Location of dredged material disposal site: _____

_____

Has a U.S. Army Corps of Engineers permit been applied for? ☐ Yes ☐ No

If you need additional room to answer any question, attach additional sheets.

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SUBMIT ONLY ONE COPY

CERTIFICATION AND SITE VIEW AUTHORIZATION

1. I hereby certify that I have read this completed application and that, to the best of my knowledge, the information in this application, and all attached appendices and exhibits, is complete and correct. I understand that the failure to provide any requested information or any misstatements submitted in support of the application shall be grounds for either refusing to accept this application, for denying the permit, for suspending or revoking a permit issued on the basis of such misrepresentations, or for seeking of such further relief as may seem proper to the County.

2. I hereby grant permission for County Planning and Building Services staff and hearing bodies to enter upon and site view the premises for which this application is made in order to obtain information necessary for the preparation of required reports and render its decision.

Owner/Authorized Agent — Date: 9/9/2025

NOTE: IF SIGNED BY AGENT, OWNER MUST SIGN BELOW.

AUTHORIZATION OF AGENT

I hereby authorize Sunny Chancellor to act as my representative and to bind me in all matters concerning this application.

Owner — Date: Sept 8, 2025

MAIL DIRECTION

To facilitate proper handling of this application, please indicate the names and mailing addresses of individuals to whom you wish correspondence and/or staff reports mailed if different from those identified on Page One of the application form.

Name	**Name**	**Name**
Mailing Address	**Mailing Address**	**Mailing Address**

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COASTAL ZONE DEVELOPMENT

COMPLETE FOR PROJECTS LOCATED IN THE COASTAL ZONE ONLY

List all property owners within 300 feet, and occupants within 100 feet along with the corresponding Assessor's Parcel Number for each owner/occupant. **This form must be typed.**

AP# 000-000-00 **LASTNAME, FIRSTNAME** **STREET ADDRESS** **CITY, STATE ZIP**	11902009 SPECK HOWARD J AND ANGELA R PO BOX 1391 MENDOCINO, CA, 95460	11902011 HONEYCUTT CARRIE TTEE PO BOX 828 MENDOCINO, CA, 95460
11902012 HONEYCUTT CARRIE TTEE PO BOX 828 MENDOCINO, CA, 95460	11902015 LARSEN MARTIN LESLEY 2132 HADDEN RD WALNUT CREEK, CA, 94596	11902016 WELLS JAMES D TTEE / PO BOX 1551 MENDOCINO, CA, 95460
11902035 WILLIAMS KRISTEN PO BOX 588 MENDOCINO, CA, 95460	11904010 MERRILL FAMILY LLC 531 W WILLOW ST WILLOWS, CA, 95988	11904014 MERRILL FAMILY LLC 531 W WILLOW ST WILLOWS, CA, 95988
11904021 MERRILL FAMILY LLC 531 W WILLOW ST WILLOWS, CA, 95988	11904038 SALAZAR MARILYN MATTHEWS T 4029 FIRE CANDLE SPRING BRANCH, TX, 78070	11904039 LITTRELL JANICE TTEE PO BOX 962 MENDOCINO, CA, 95460
11904040 TRIMIEW DIANE V PO BOX 307 LITTLE RIVER, CA, 95456		
11904005 DEATON TTEE DAVID M 1041 E TEHACHAPI DR LONG BEACH, CA, 90807	11904037 DEATON FAMILY TRUST 1041 E TEHACHAPI DR LONG BEACH, CA, 90807-2451	11904041 DEATON TTEE DAVID M 1041 E TEHACHAPI DR LONG BEACH, CA, 90807

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COMPLETE FOR PROJECTS LOCATED WITHIN THE COASTAL ZONE ONLY

DECLARATION OF POSTING

At the time the application is submitted for filing, the applicant must **Post**, at a conspicuous place, easily read by the public and as close as possible to the site of the proposed development, notice that an application for the proposed development has been submitted. Such notice shall contain a general description of the nature of the proposed development and shall be on the standard form provided in the application packet. If the applicant fails to post the completed notice form and sign the **Declaration of Posting**, the Department of Planning and Building Services cannot process the application.

As **Proof of Posting**, please sign and date this Declaration of Posting form when the site is posted; it serves as proof of posting. It should be returned to the Department of Planning and Building Services with the application.

Pursuant to the requirements of Section 20.532.025(H) of the Mendocino County Code, I hereby certify that on 9/8/2025 (date of posting), I or my authorized representative posted the "NOTICE OF PENDING PERMIT" for application to obtain a Coastal Development Permit for the development of:

- Renovate Existing Primary Residence - Expand Parking Area at Primary Residence
- Permit Existing Class K Structure as an ADU - Install Mitigation Measures for ADU as per Biological Report re: Graening & Associates, LLC

(Description of development)

Located at:
44650 Raven Lane, Mendocino, CA, 95460
APN# 119-04-037-00

(Address of development and Assessor's Parcel Number)

The public notice was posted at:

At Driveway of 44700 Raven Lane, Mendocino, CA, 95460, which must be passed though to access subject parcel
Both owned by same owner.

(A conspicuous place, easily seen by the public and as close as possible to the site of proposed development)



Owner/Authorized Representative

Sept 9, 2025

Date

(A copy of the notice which was posted shall be attached to this form).

NOTE: YOUR APPLICATION CANNOT BE PROCESSED UNTIL THIS "DECLARATION OF POSTING" IS SIGNED AND RETURNED TO PLANNING AND BUILDING SERVICES.

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COMPLETE FOR PROJECTS LOCATED WITHIN THE COASTAL ZONE ONLY

NOTICE OF PENDING PERMIT

A COASTAL PERMIT APPLICATION FOR DEVELOPMENT ON THIS SITE IS PENDING BEFORE THE COUNTY OF MENDOCINO:

PROPOSED DEVELOPMENT : - Renovate Existing Primary Residence
- Expand Parking Area at Primary Residence
- Permit Existing Class K Structure as an ADU
- Install Mitigation Measures for ADU as per Biological Report re: Graening & Associates, LLC

LOCATION: 44650 Raven Lane, Mendocino, CA, 95460

APPLICANT : David Deaton

ASSESSOR'S PARCEL NUMBER(S): 119-04-037-00

DATE NOTICE POSTED: 9/8/2025

FOR FURTHER INFORMATION, PLEASE TELEPHONE OR WRITE TO:

COUNTY OF MENDOCINO
PLANNING & BUILDING SERVICES
860 NORTH BUSH STREET
UKIAH, CA 95482
707-234-6650

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COUNTY OF MENDOCINO

DEPARTMENT OF PLANNING AND BUILDING SERVICES
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www.mendocinocounty.gov/pbs

Indemnification And Hold Harmless

ORDINANCE NO. 3780, adopted by the Board of Supervisors on June 4, 1991, requires applicants for discretionary land use approvals, to sign the following Indemnification Agreement. Failure to sign this agreement will result in the application being considered incomplete and withheld from further processing.

Indemnification Agreement

As part of this application, applicant agrees to defend, indemnify, release and hold harmless the County of Mendocino, its agents, officers, attorneys, employees, boards and commissions, as more particularly set forth in Mendocino County Code Section 1.04.120, from any claim, action or proceeding brought against any of the foregoing individuals or entities, the purpose of which is to attack, set aside, void or annul the approval of this application or adoption of the environmental document which accompanies it. The indemnification shall include, but not be limited to, damages, costs, expenses, attorney fees or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in connection with the approval of this application, whether or not there is concurrent, passive or active negligence on the part of the County, its agents, officers, attorneys, employees, boards and commissions.

Sept 9, 2025
Date

Applicant

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COUNTY OF MENDOCINO

DEPARTMENT OF PLANNING AND BUILDING SERVICES
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JULIA KROG, DIRECTOR
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FB FAX: 707-961-2427
pbs@mendocinocounty.gov
www.mendocinocounty.gov

ACKNOWLEDGEMENT OF DEPOSIT/HOURLY FEE

By signing below, the applicant acknowledges that the staff at Planning and Building Services has discussed the potential for collection of a deposit fee for the projects listed below (as adopted by the Board of Supervisors Resolution No's 11-072, 16-150, 18-122, 19-170 and 23-190)

1. Division of Land Project
2. General Plan Project
3. Coastal Project
4. Zoning Project
5. Administrative Project
6. Cannabis Project
7. Private Road Naming

Once an application has been submitted and the processing costs approach 80% of the application fee, additional staff processing time will be billed at $98.00/hour. Staff will notify the applicant/owner that a deposit equal to 50% of the initial filing fee is required for further processing, and more than one deposit may be required depending on the complexity of the project and the staff time necessary to complete application processing.

I acknowledge that I was advised of the deposit fee for continued processing after the initial application fee has been expended.



Applicant Signature

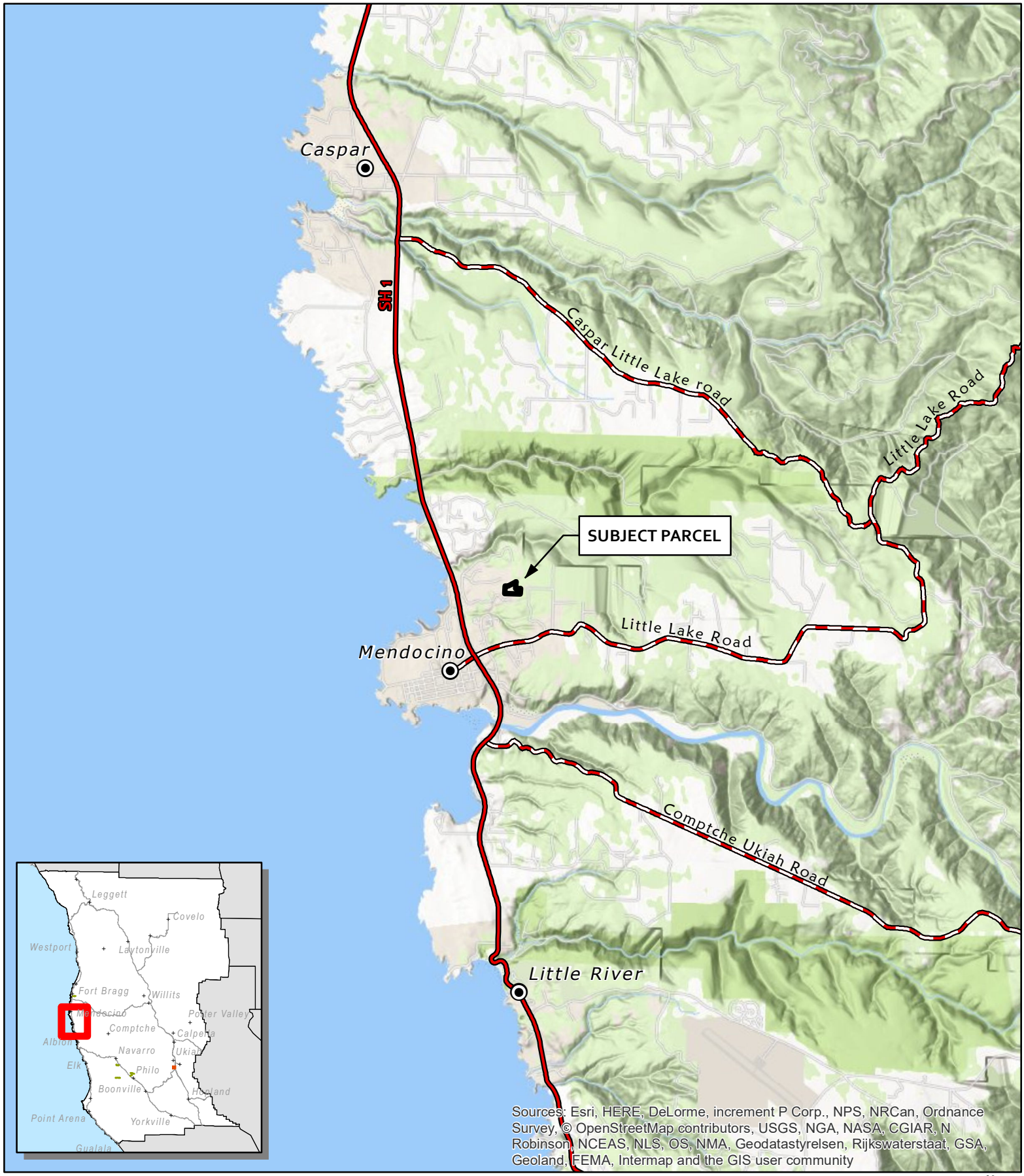
Sept 9, 2025

Date

OFFICE USE ONLY:

CDP_2025-0020 Deaton

Project or Permit Number



Sources: Esri, HERE, DeLorme, increment P Corp., NPS, NRCan, Ordnance Survey, © OpenStreetMap contributors, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Major Towns & Places
Highways
Major Roads

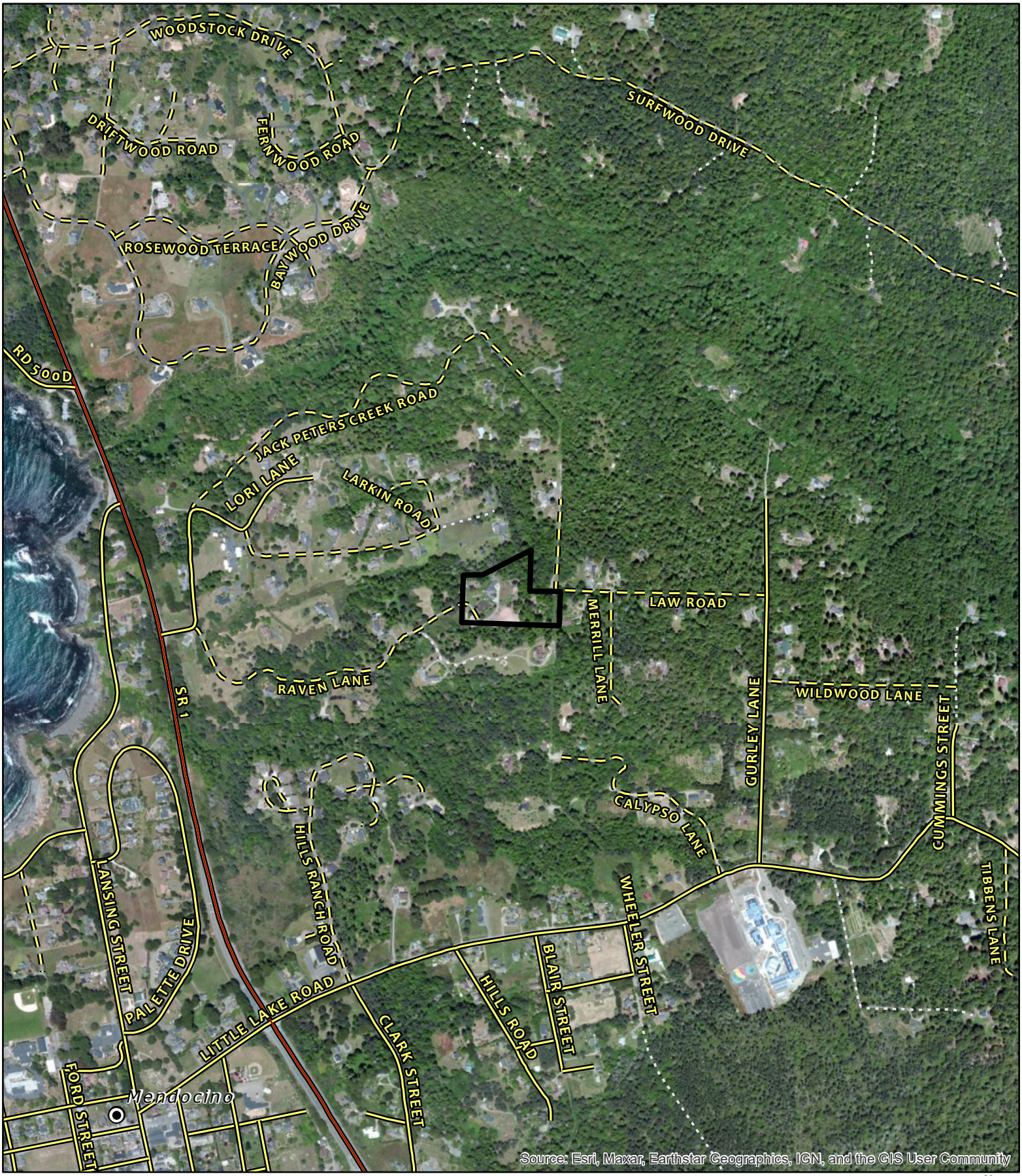
0 2,800 5,600 Feet
0 0.5 1 Miles

N
W E
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1:63,360

LOCATION

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Major Towns & Places
Highways (2017)
Public Roads
Private Roads
Driveways/Unnamed Roads

0 455 910 Feet
0 0.075 0.15 Miles

N
W E
S

1:10,000

AERIAL IMAGERY

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Private Roads

Driveways/Unnamed Roads

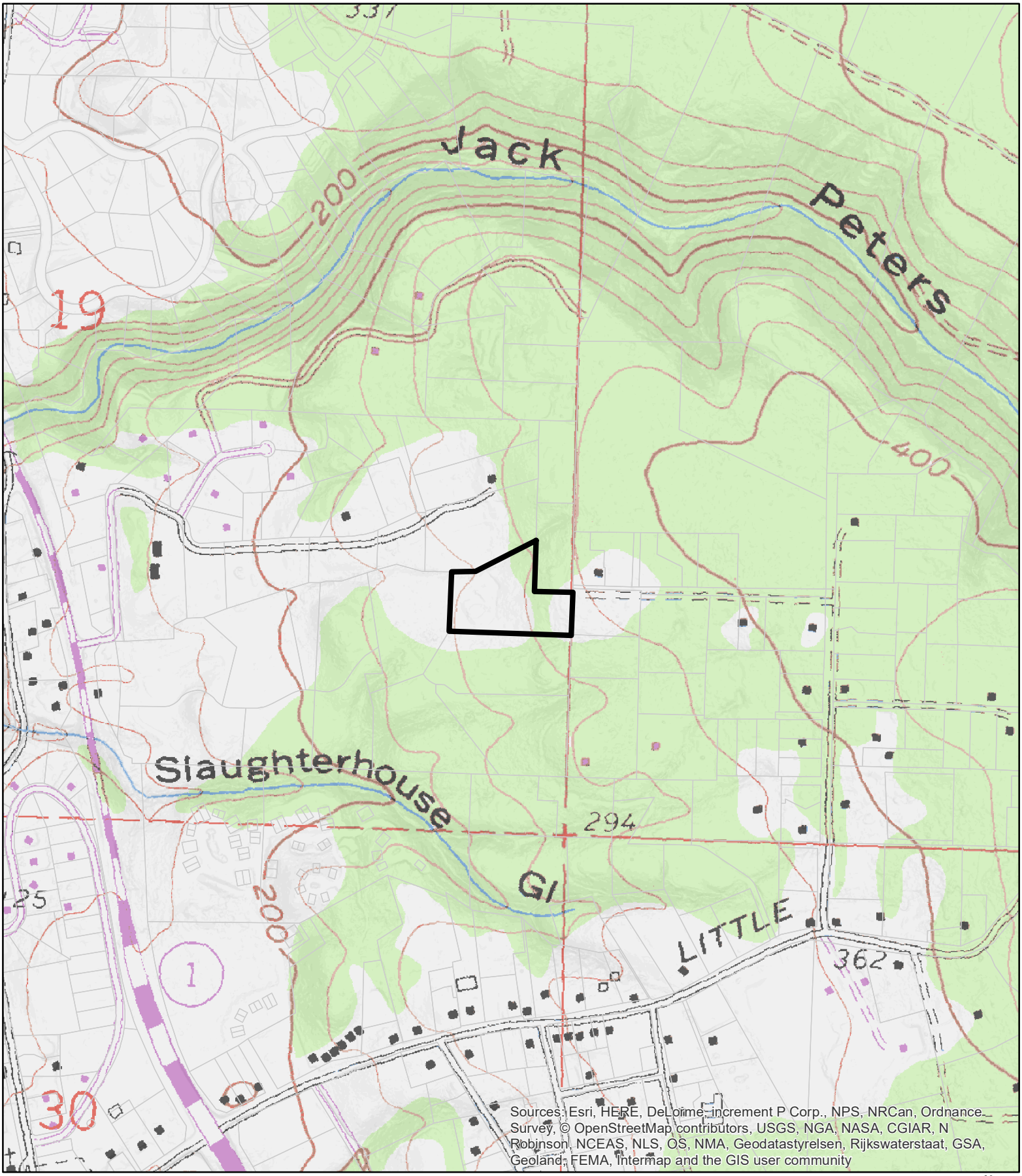
0 55 110 Feet
0 0.01 0.02 Miles

N W E S

1:1,250

AERIAL IMAGERY

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

0 362.5 725 Feet
0 0.05 0.1 Miles

N
W E
S

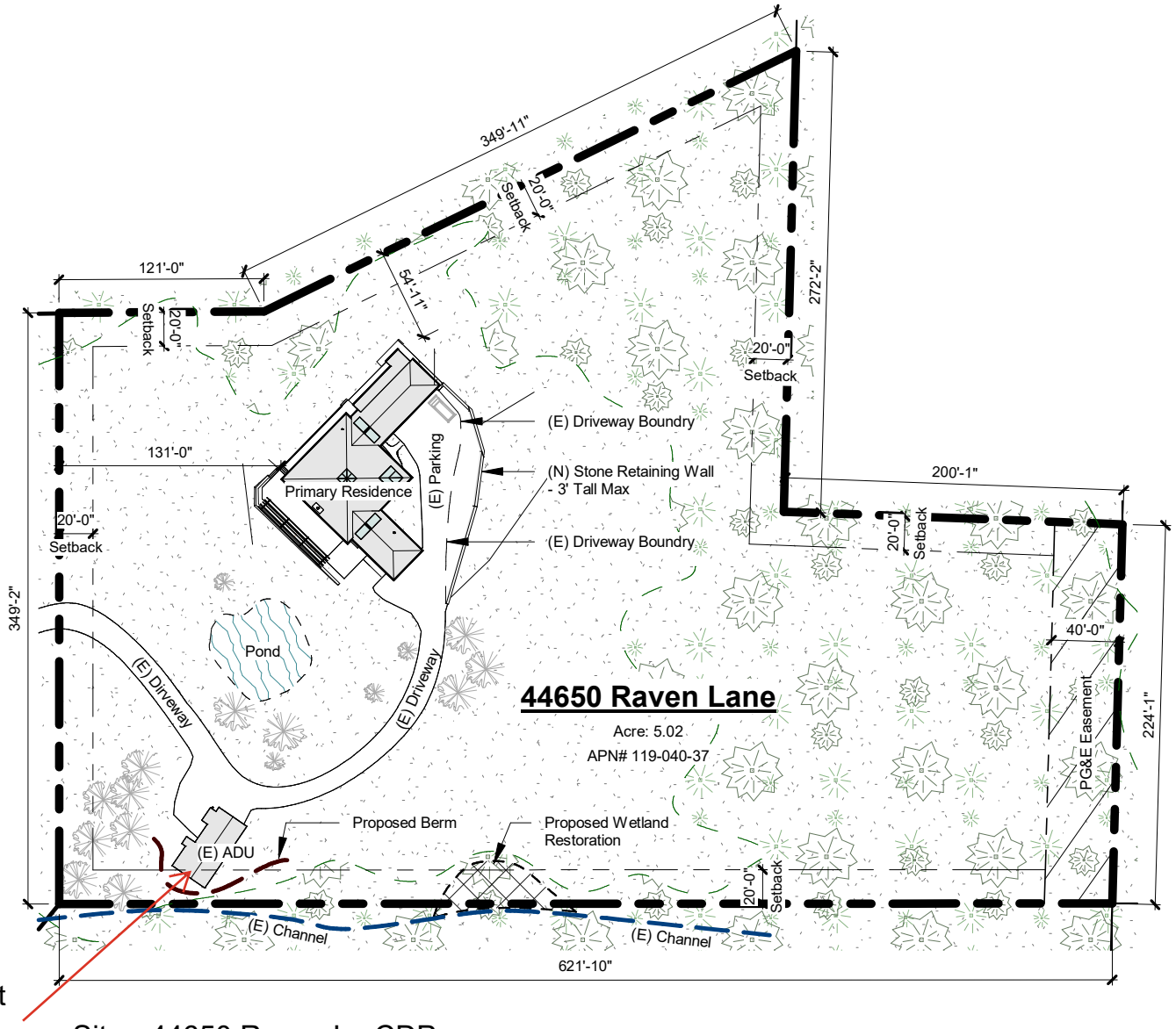
1:8,000

TOPOGRAPHIC MAP
CONTOUR INTERVAL IS 40 FEET

THIS MAP AND DATA ARE PROVIDED WITHOUT WARRANTY OF ANY KIND.
DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES

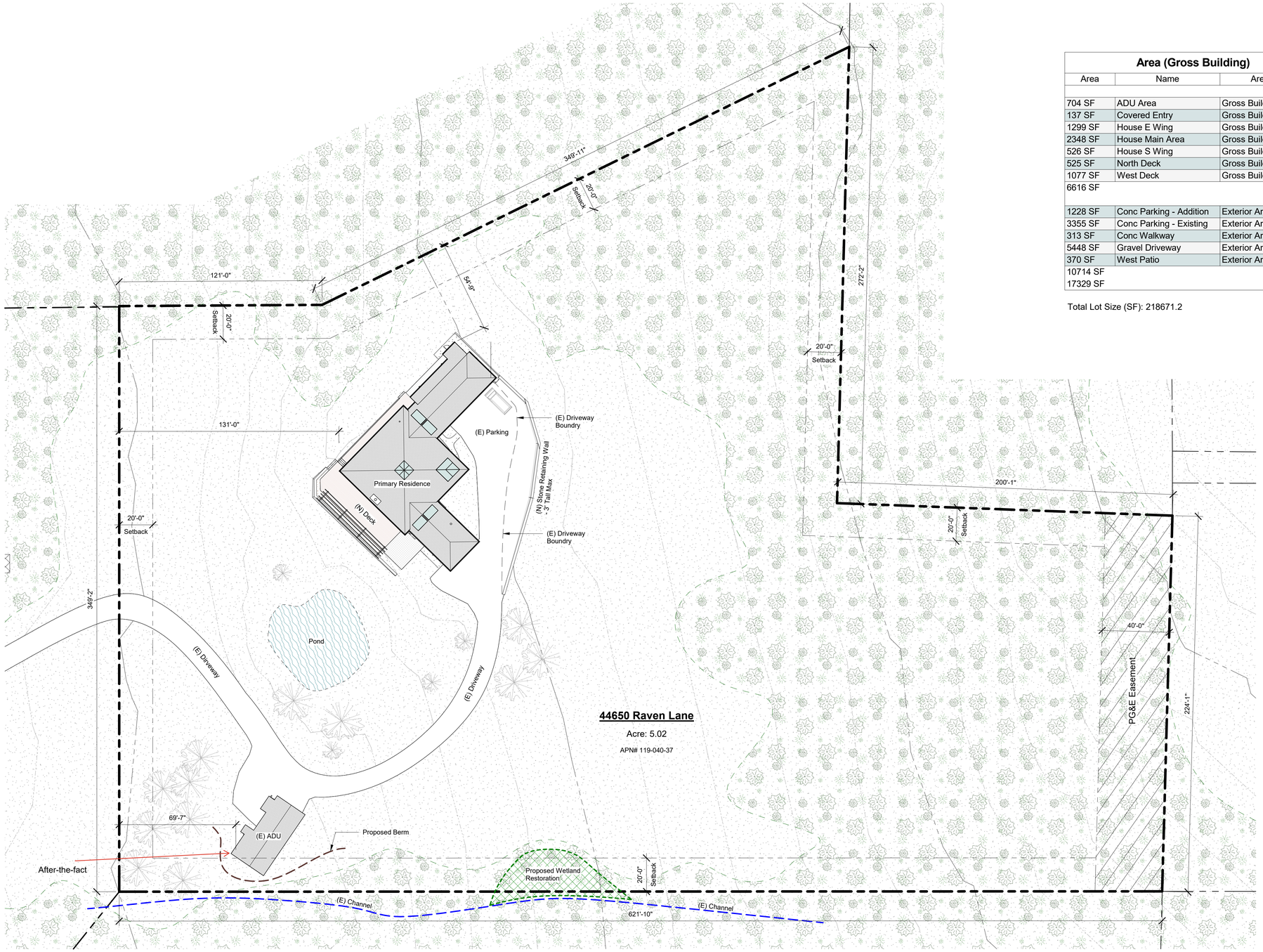


After-the-fact



1 Site - 44650 Raven Ln CDP
1" = 100'-0"

AUM CONSTRUCTION INC. General Contractor Lic. # 817115 www.aumconstruction.com	David Deaton 44650 Raven CDP 44650 Raven Lane, Mendocino, CA 95460	APN # : 119-040-37	SCALE : 1" = 100'-0"
		DATE : 09/09/25	DRAWN BY : SLLC



1 Site
1" = 30'-0"

Area (Gross Building)

Area	Name	Area Type
704 SF	ADU Area	Gross Building Area
137 SF	Covered Entry	Gross Building Area
1299 SF	House E Wing	Gross Building Area
2348 SF	House Main Area	Gross Building Area
526 SF	House S Wing	Gross Building Area
525 SF	North Deck	Gross Building Area
1077 SF	West Deck	Gross Building Area
6616 SF		
1228 SF	Conc Parking - Addition	Exterior Area
3355 SF	Conc Parking - Existing	Exterior Area
313 SF	Conc Walkway	Exterior Area
5448 SF	Gravel Driveway	Exterior Area
370 SF	West Patio	Exterior Area
10714 SF		
17329 SF		

Total Lot Size (SF): 218671.2

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

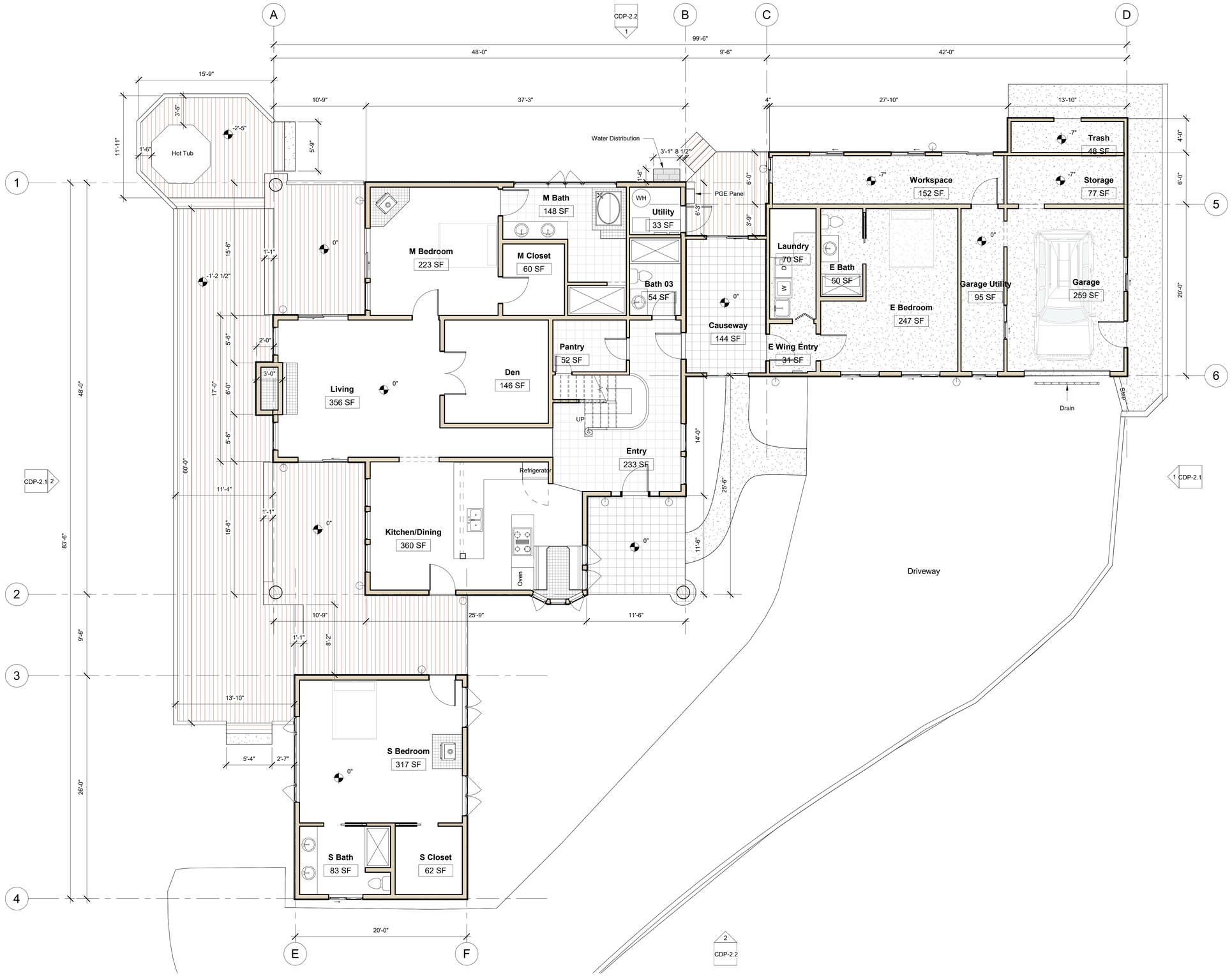
DRAWN BY : SLLC

CDP-1.0

SCALE : 1" = 30'-0"

Site

9/9/2025 10:24:08 AM



AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton

44650 Raven CDP

44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

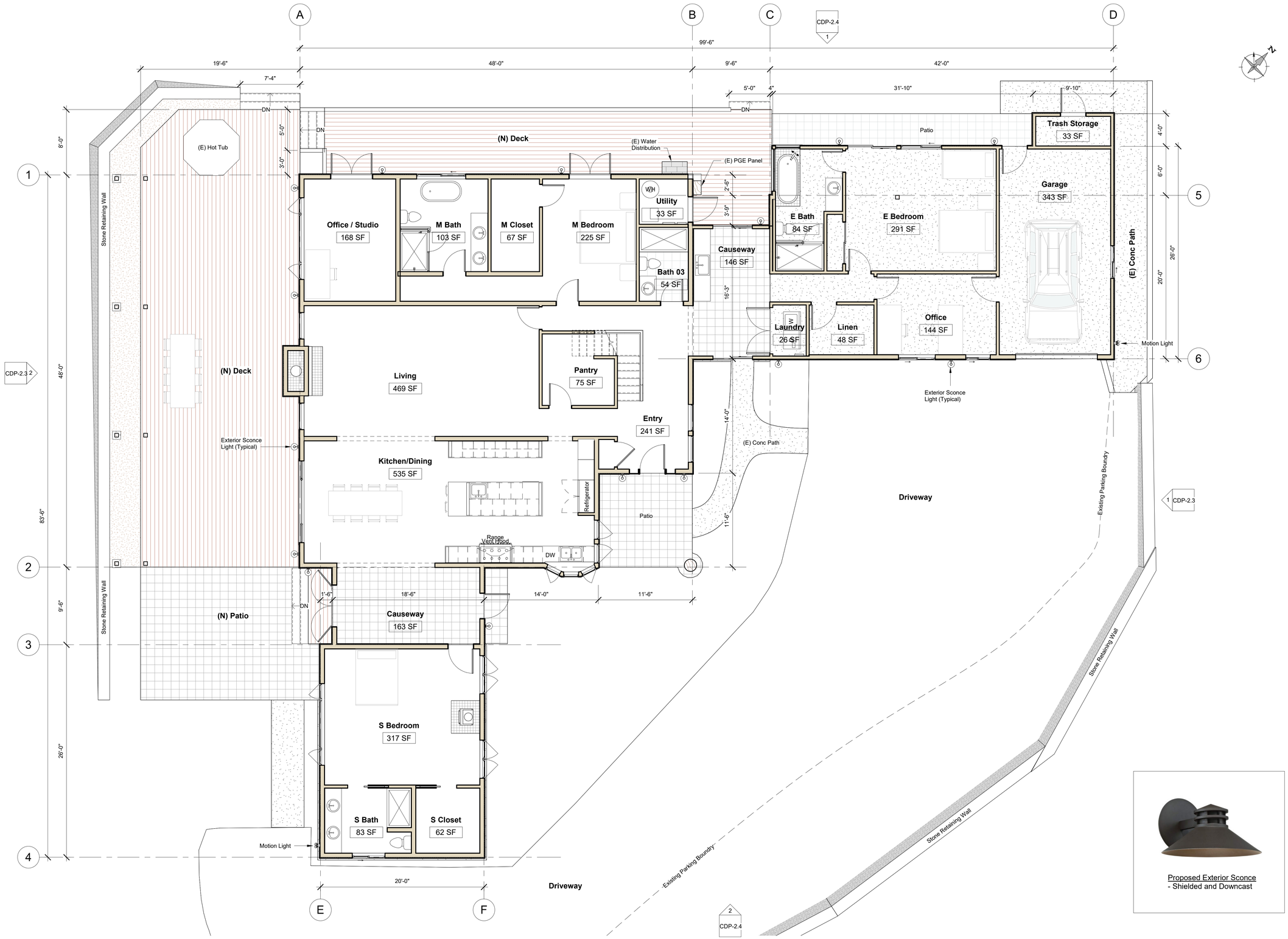
DRAWN BY : SLLC

CDP-1.1

SCALE : 3/16" = 1'-0"

Floor Plan - Existing

9/9/2025 10:24:11 AM



1 Main - Proposed
3/16" = 1'-0"

Proposed Exterior Sconce
- Shielded and Downcast

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton

44650 Raven CDP

44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

DRAWN BY : SLLC

CDP-1.2

SCALE : 3/16" = 1'-0"

Floor Plan - Proposed

9/9/2025 10:24:12 AM

1 Loft - Existing
3/16" = 1'-0"

2 Loft - Proposed
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # :
119-040-37

DATE : 9/9/25

DRAWN BY : SLLC

CDP-1.3

SCALE :
3/16" = 1'-0"

Loft

9/9/2025 10:24:14 AM

1 Roof
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # :
119-040-37

DATE : 9/9/25

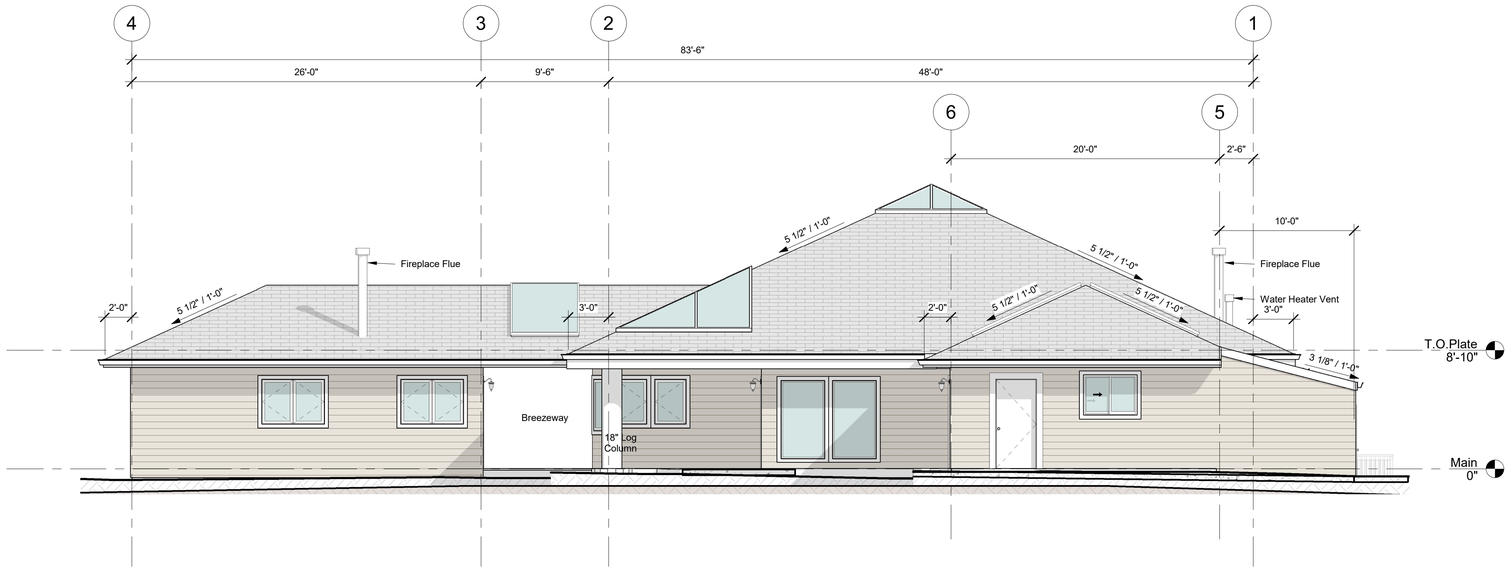
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CDP-1.4

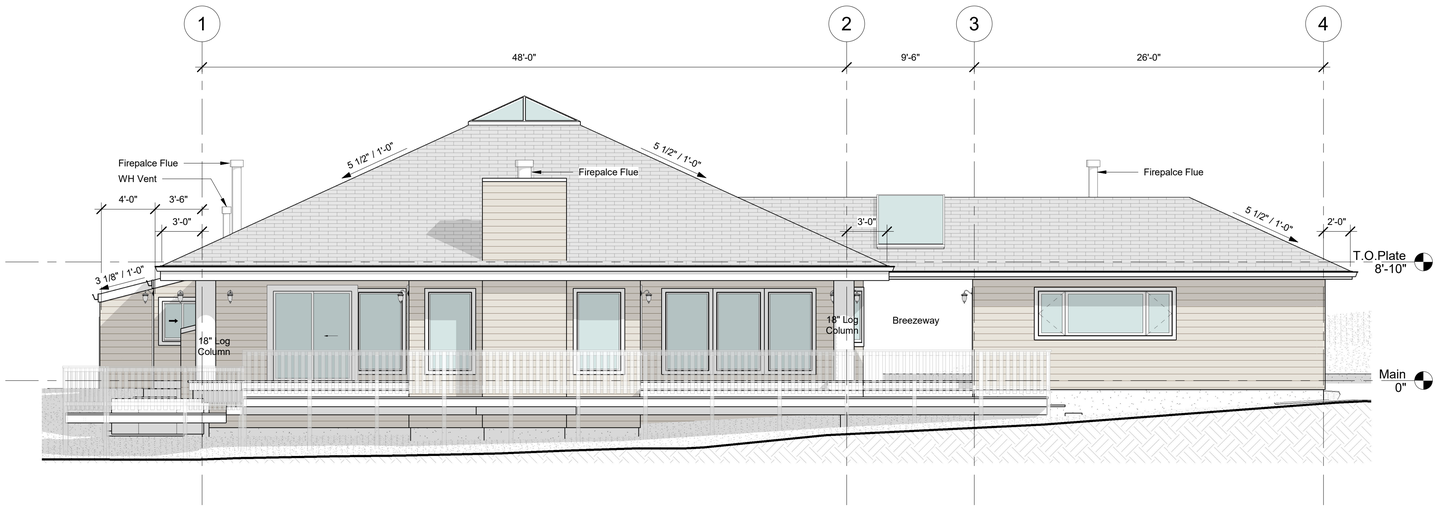
SCALE :
3/16" = 1'-0"

Roof Plan

9/9/2025 10:24:14 AM



1 East - Existing
3/16" = 1'-0"



2 West - Exisitng
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
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CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

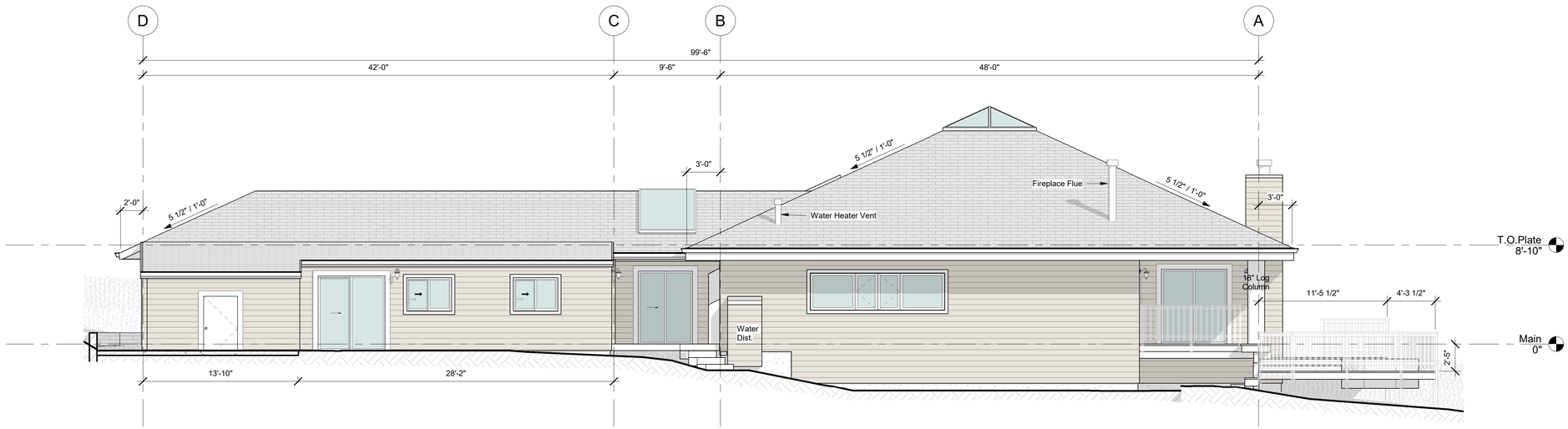
DRAWN BY : SLLC

CDP-2.1

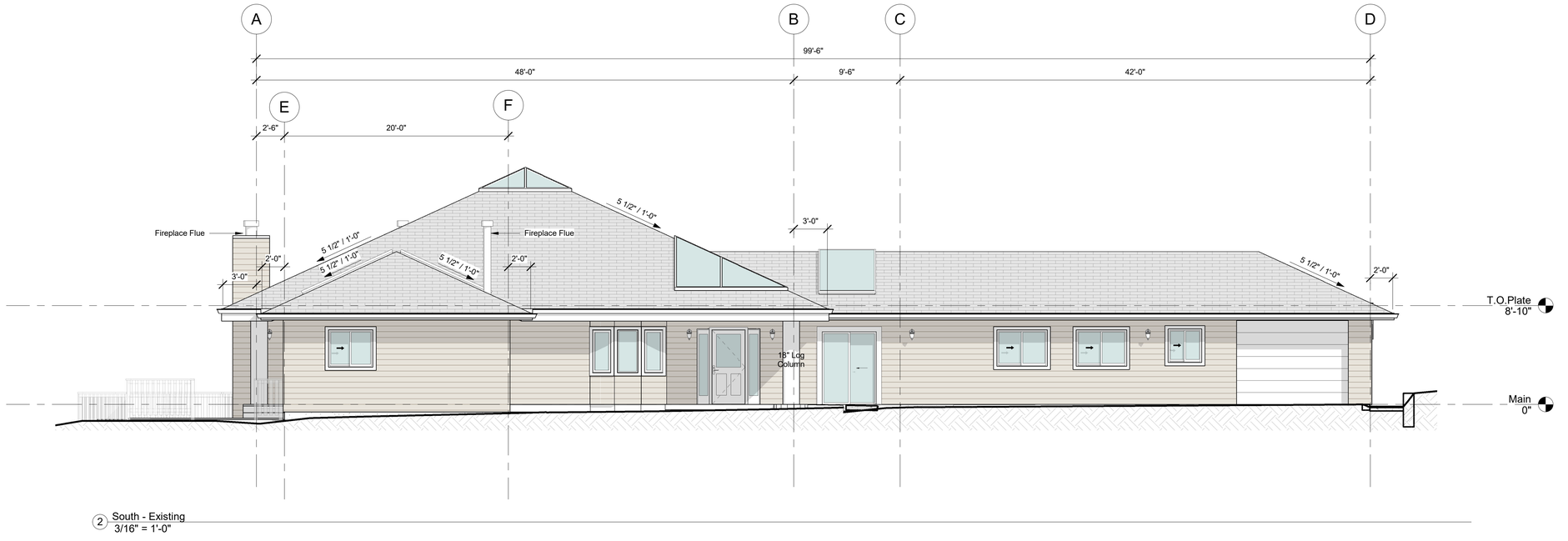
SCALE : 3/16" = 1'-0"

Elevations - Existing

9/9/2025 10:24:16 AM



1 North - Esisting
3/16" = 1'-0"



2 South - Existing
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

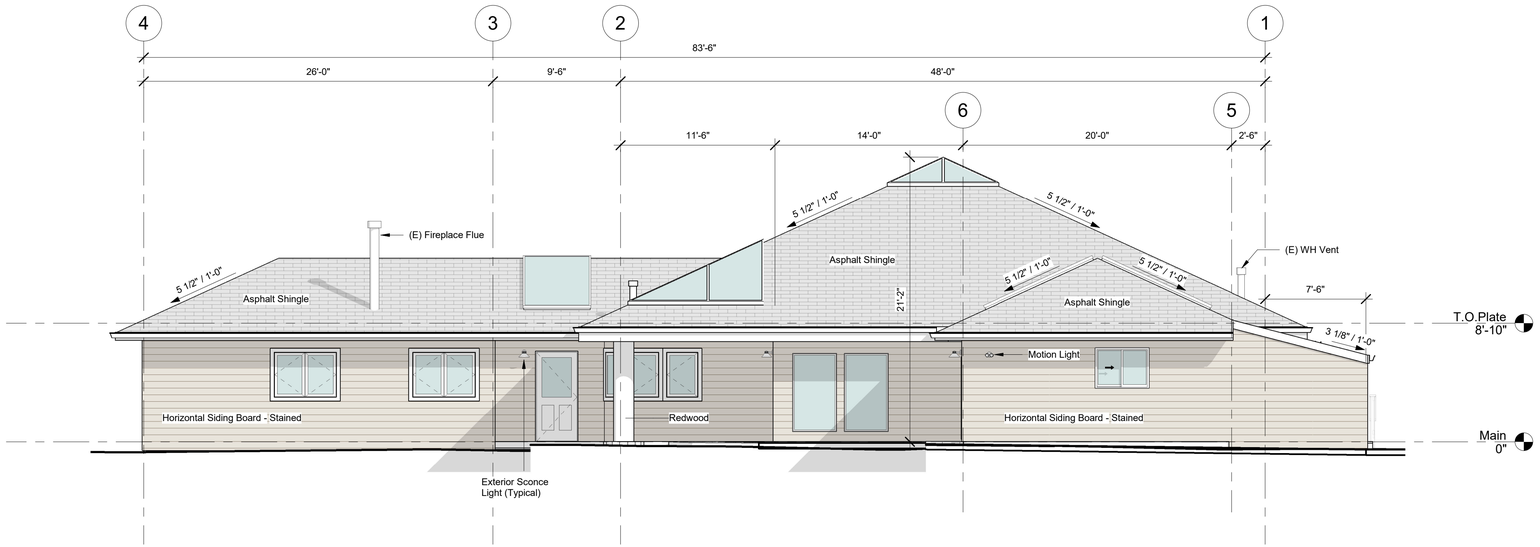
DRAWN BY : SLLC

CDP-2.2

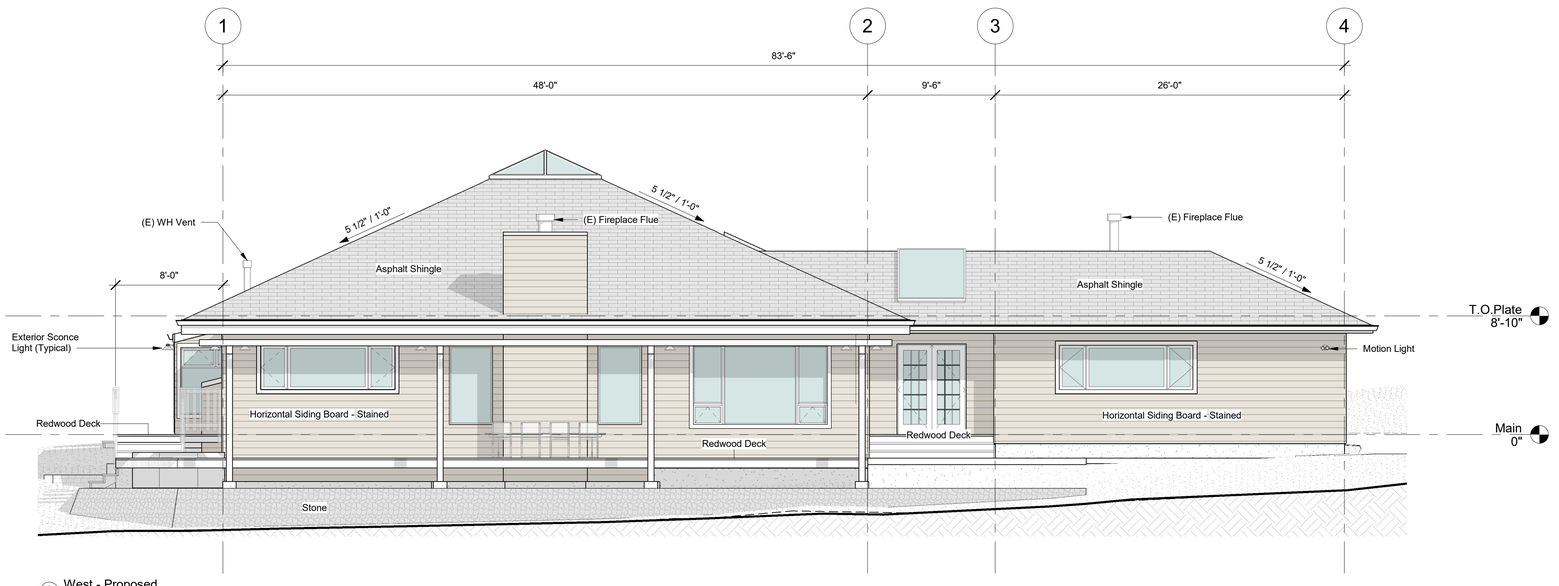
SCALE : 3/16" = 1'-0"

Elevations - Existing

9/9/2025 10:24:20 AM



1 East - Proposed
3/16" = 1'-0"



2 West - Proposed
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

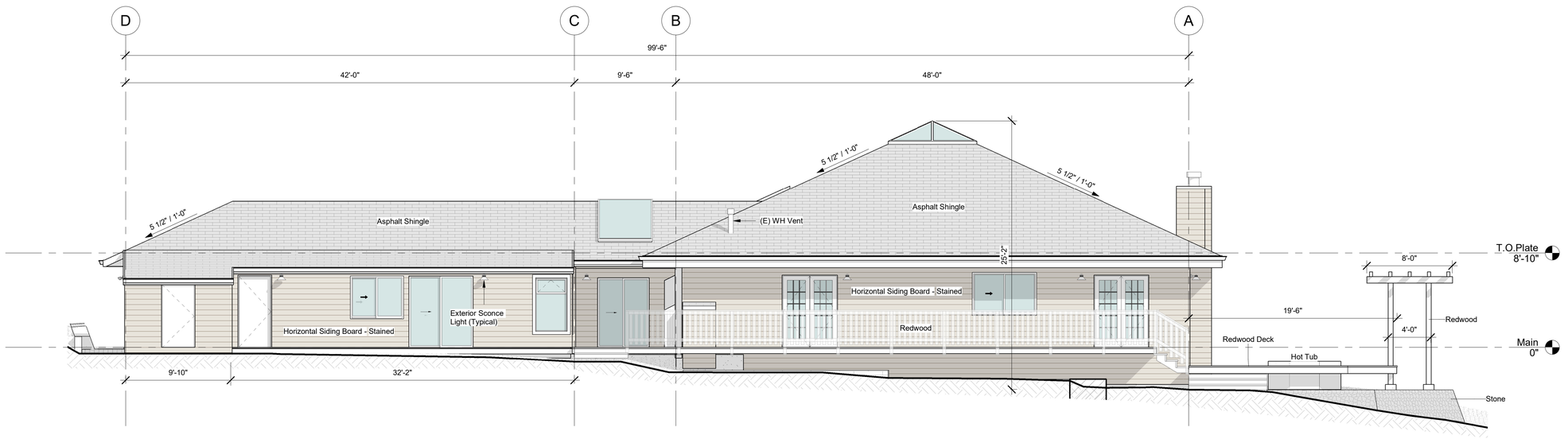
DRAWN BY : SLLC

CDP-2.3

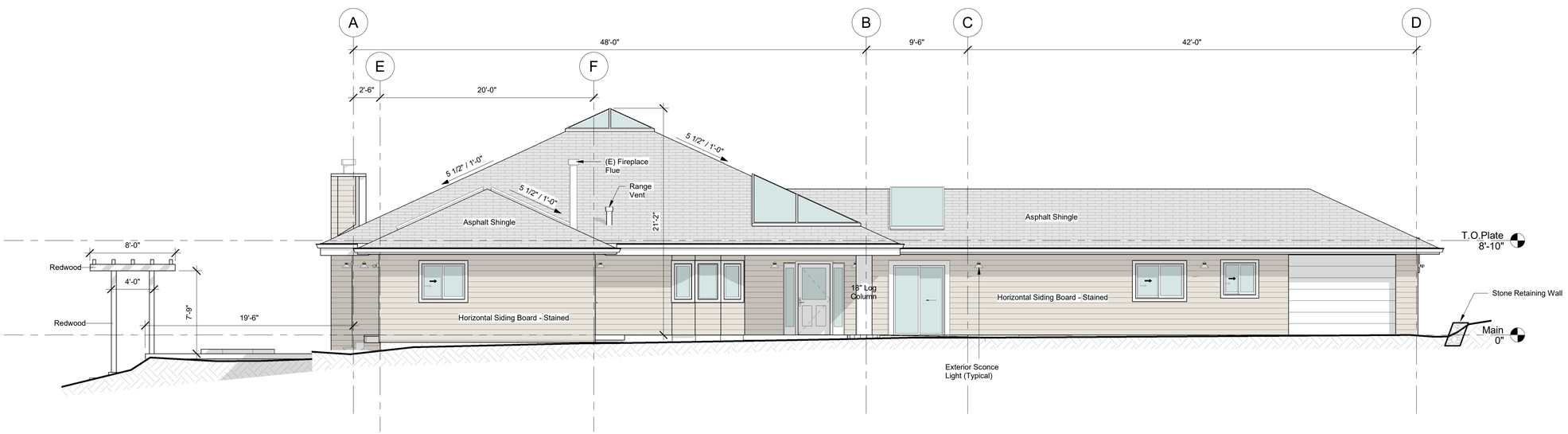
SCALE : 3/16" = 1'-0"

Elevations - Proposed

9/9/2025 10:24:23 AM



1 North - Proposed
3/16" = 1'-0"



2 South - Proposed
3/16" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton

44650 Raven CDP

44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

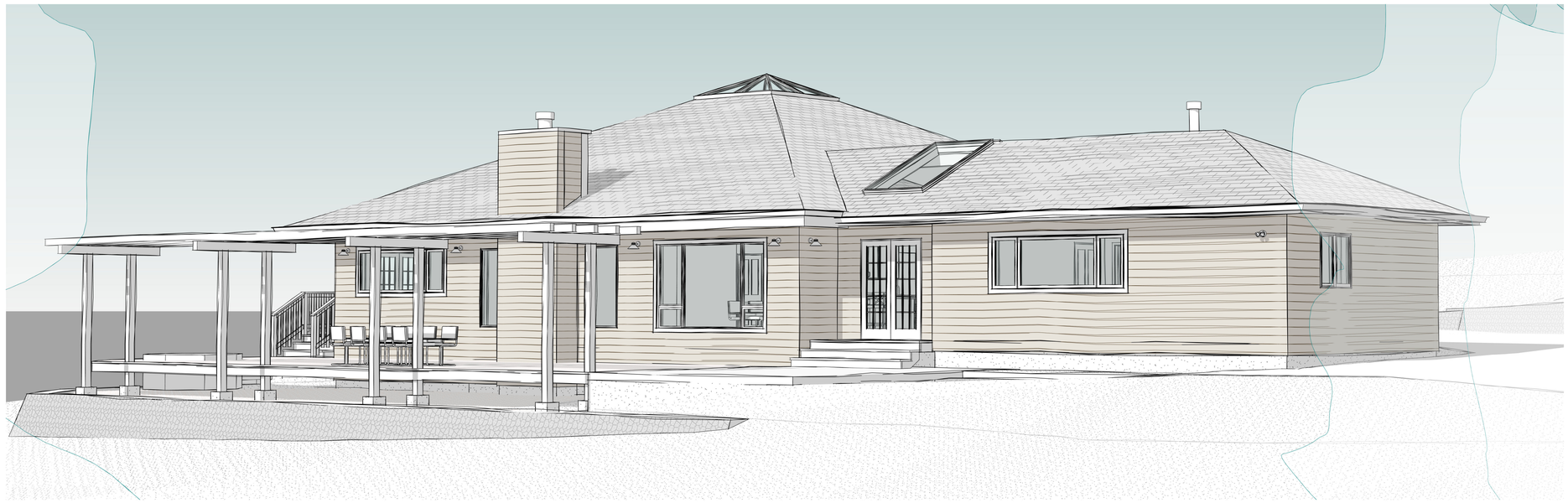
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CDP-2.4

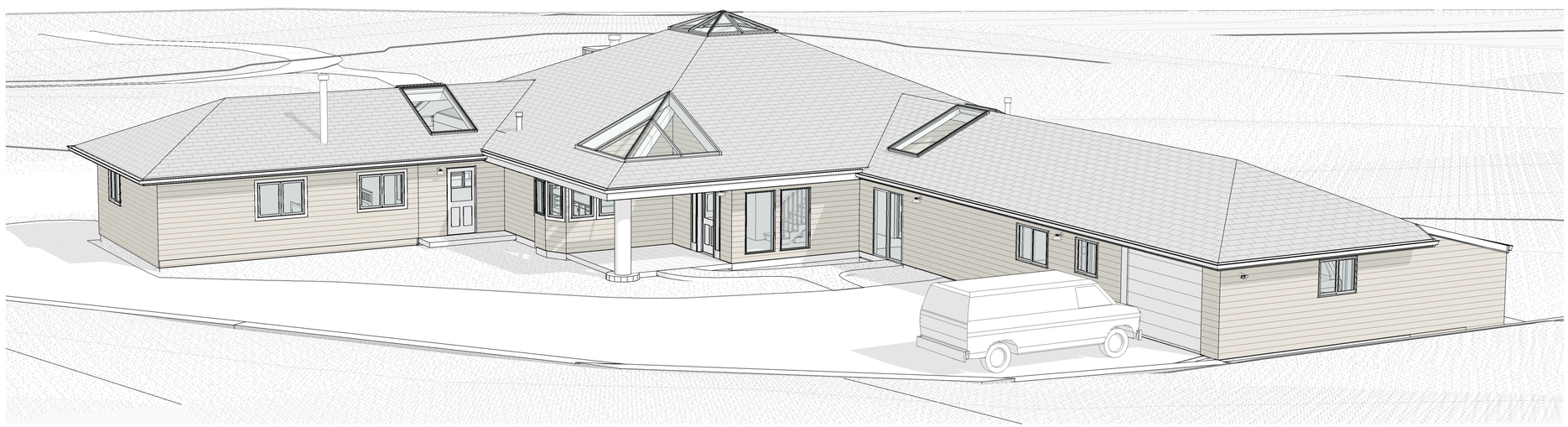
SCALE : 3/16" = 1'-0"

Elevations - Proposed

9/9/2025 10:24:30 AM



1 3D View - Downhill



3 3D View - Front

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
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CONTRACTORS
: :

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP
44650 Raven Lane, Mendocino, CA 95460

APN # : 119-040-37

DATE : 9/9/25

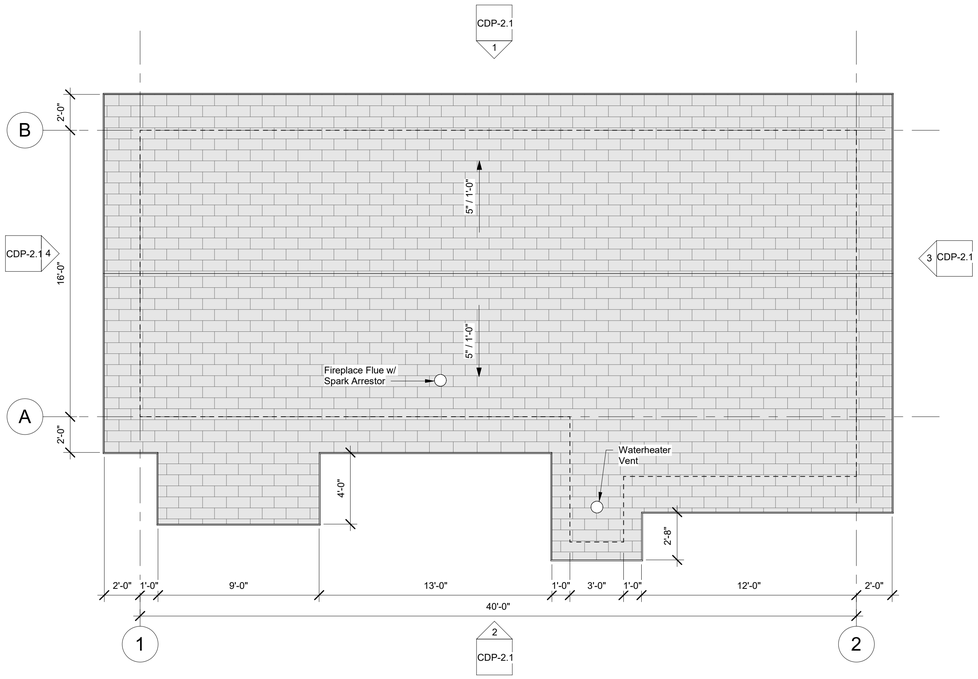
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CDP-9.1

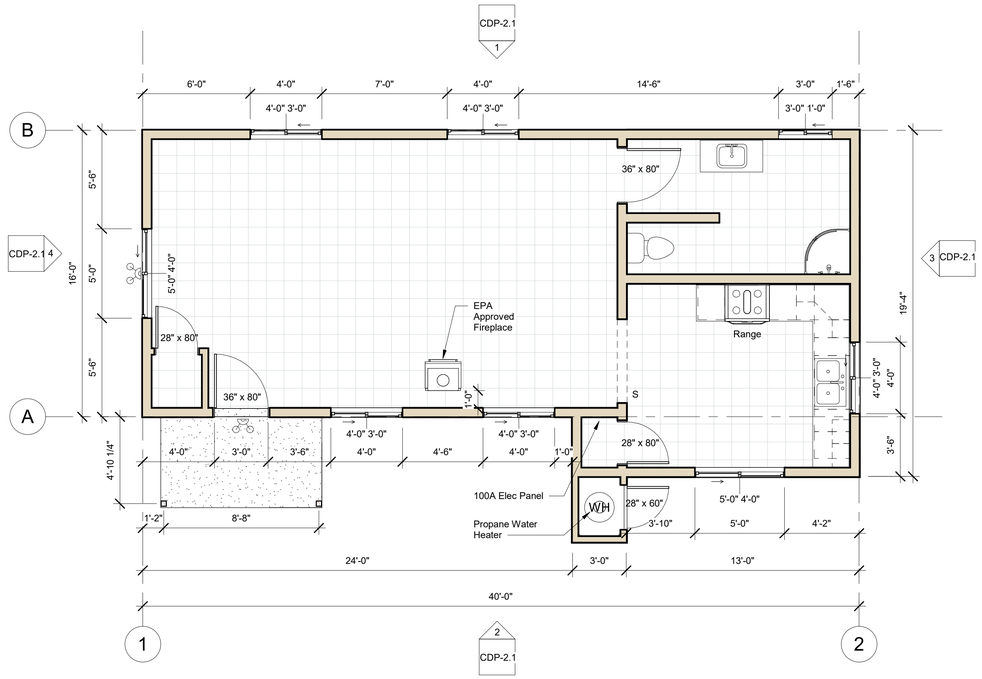
SCALE :

Perspectives

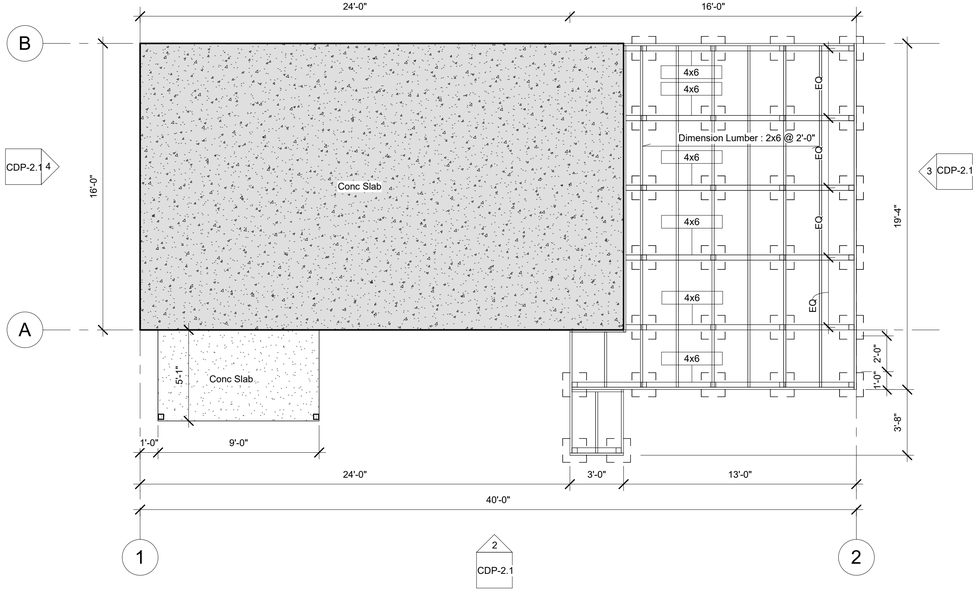
9/9/2025 10:24:41 AM



2 Roof - Existing
1/4" = 1'-0"



1 Main - Existing
1/4" = 1'-0"



4 Foundation - Existing
1/4" = 1'-0"



AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton
44650 Raven CDP - ADU
44700 Raven Lane, Mendocino, CA 95460

APN # : 119-040-41

DATE : 09/09/2025

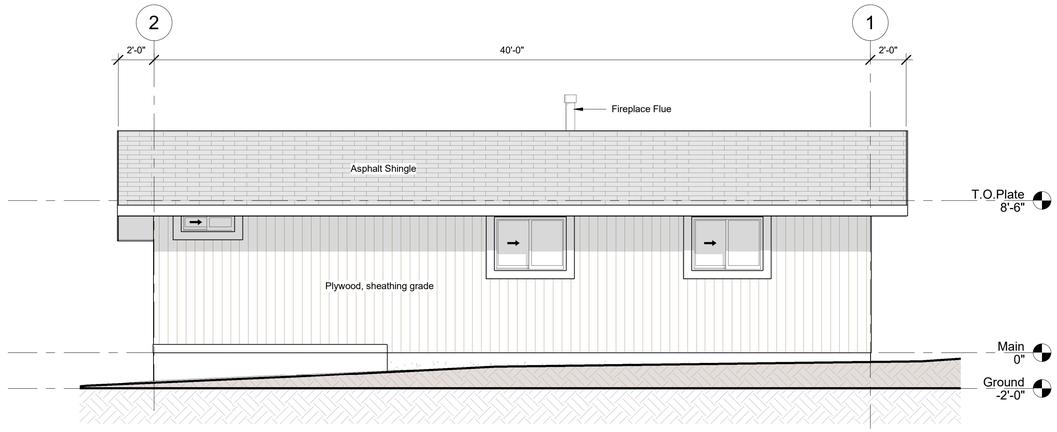
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CDP-1.1

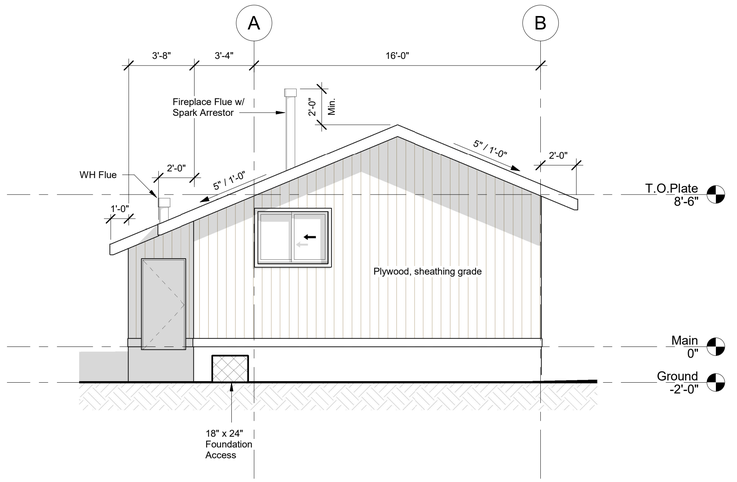
SCALE : 1/4" = 1'-0"

Plans - Existing

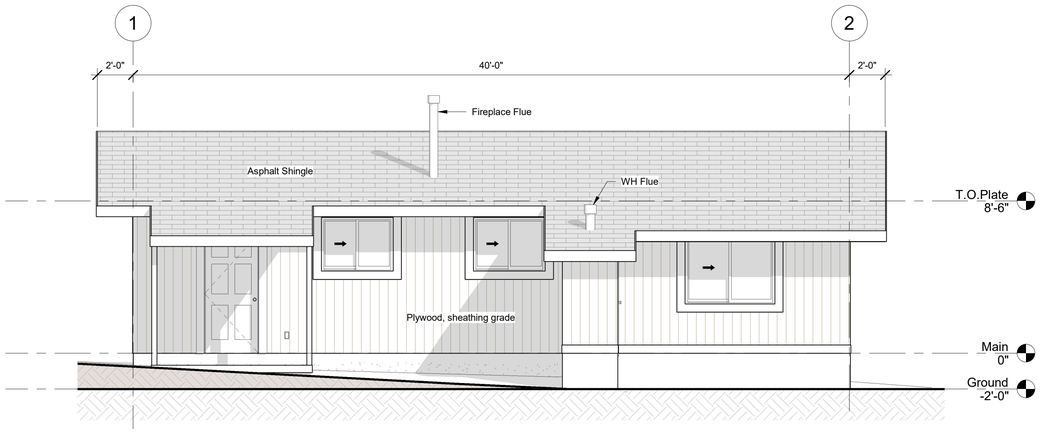
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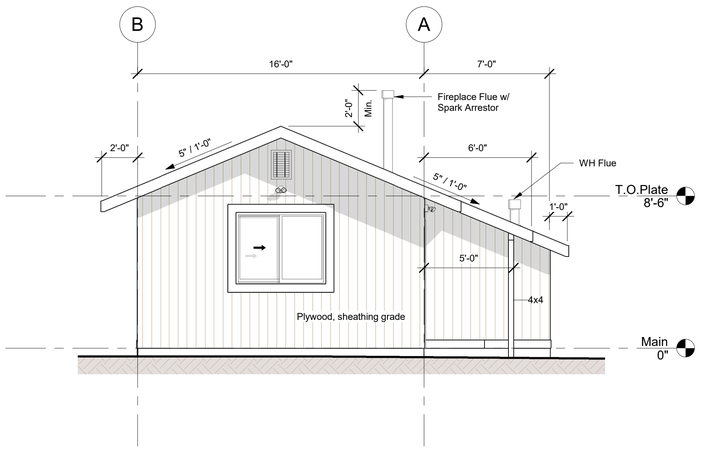
1 East - Existing
1/4" = 1'-0"



3 South - Existing
1/4" = 1'-0"



2 West - Existing
1/4" = 1'-0"



4 North - Existing
1/4" = 1'-0"

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

CONTRACTORS

REVISIONS:

No.	Description	Date

David Deaton

44650 Raven CDP - ADU

44700 Raven Lane, Mendocino, CA 95460

APN # : 119-040-41

DATE : 09/09/2025

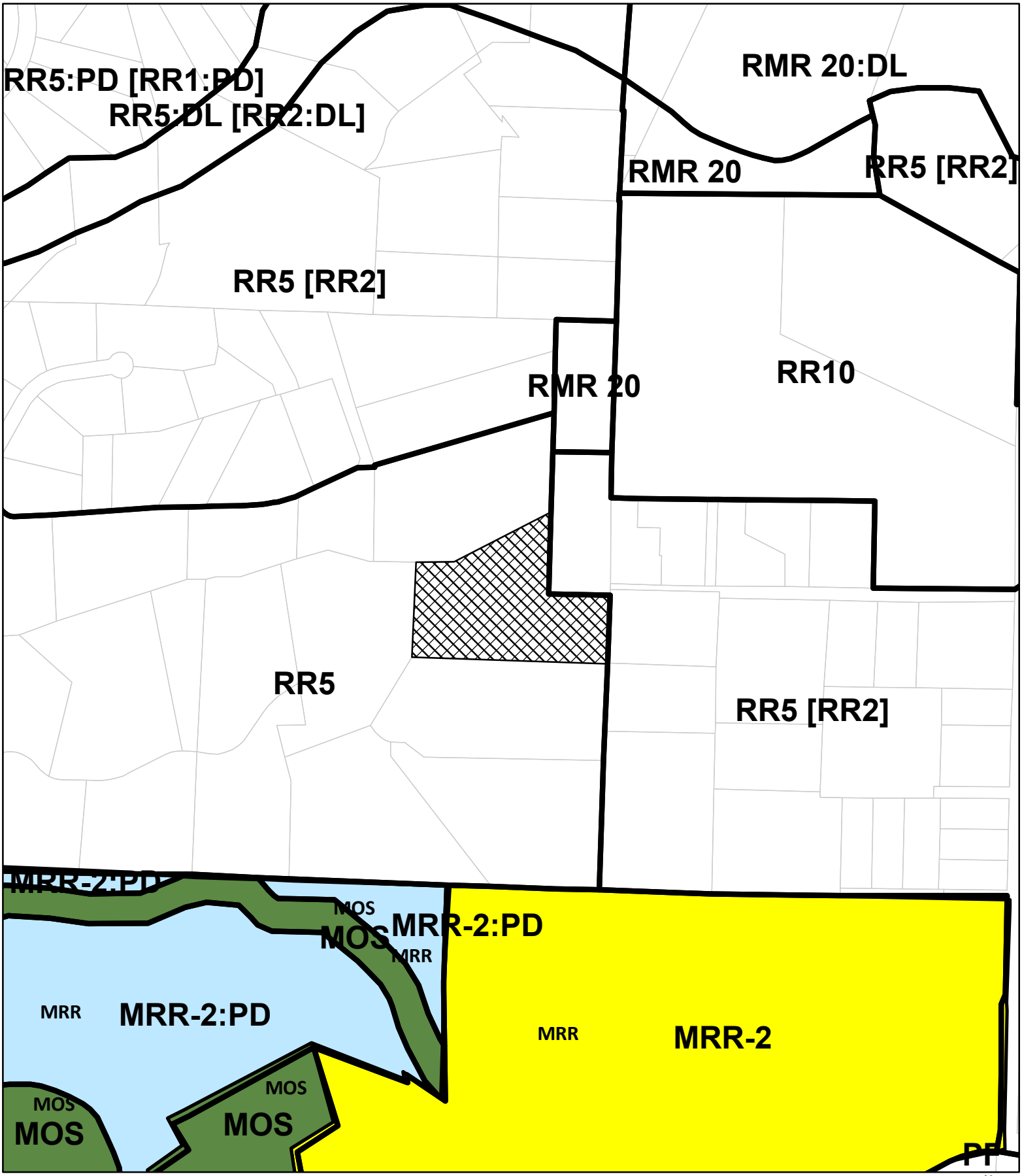
DRAWN BY : SLLC

CDP-2.1

SCALE : 1/4" = 1'-0"

Elevations - Existing

9/9/2025 10:51:25 AM



CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

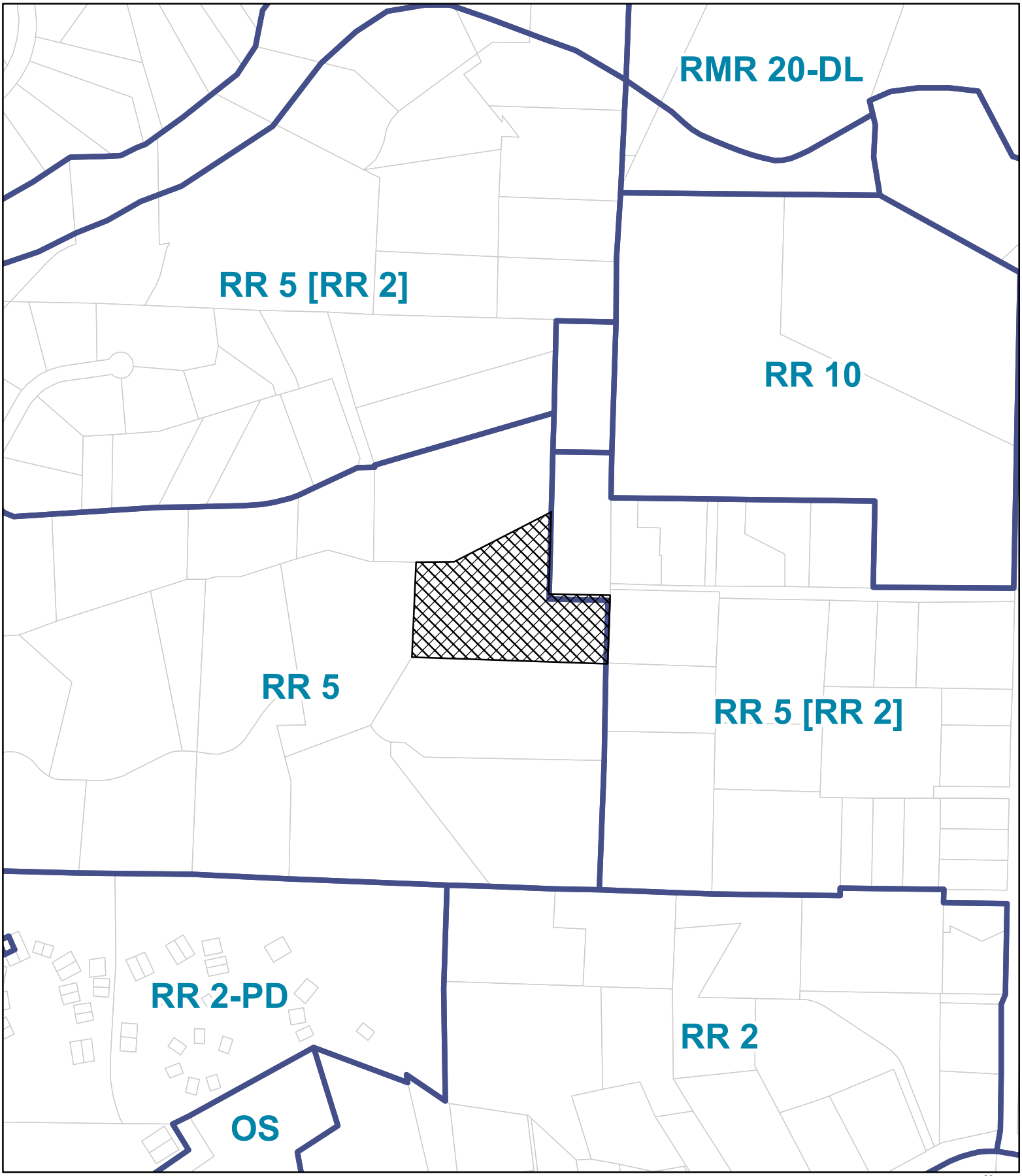
Zoning Districts
Mendocino Town Zoning 020521
ZONEDISP
MOS
MRR-2
MRR-2-PD
Assessors Parcels

0 225 450 Feet
0 0.04 0.08 Miles
1:5,000

N
W E
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ZONING

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

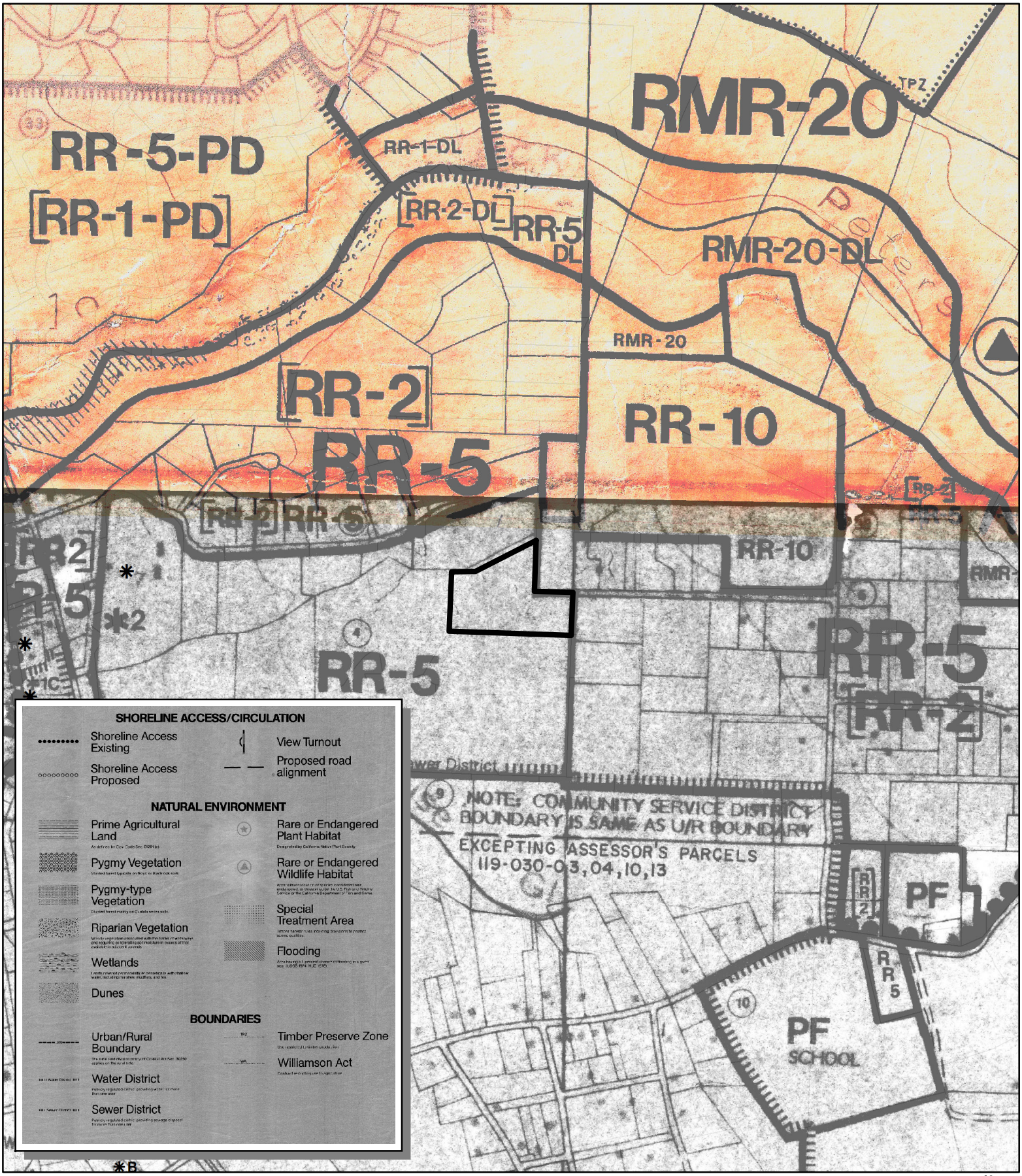
0 225 450 Feet
0 0.04 0.08 Miles

N W E S

1:5,000

GENERAL PLAN

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

✱ Visitor_Accomodation_&_Services

✱B Mendo Town B&Bs

Assessors Parcels

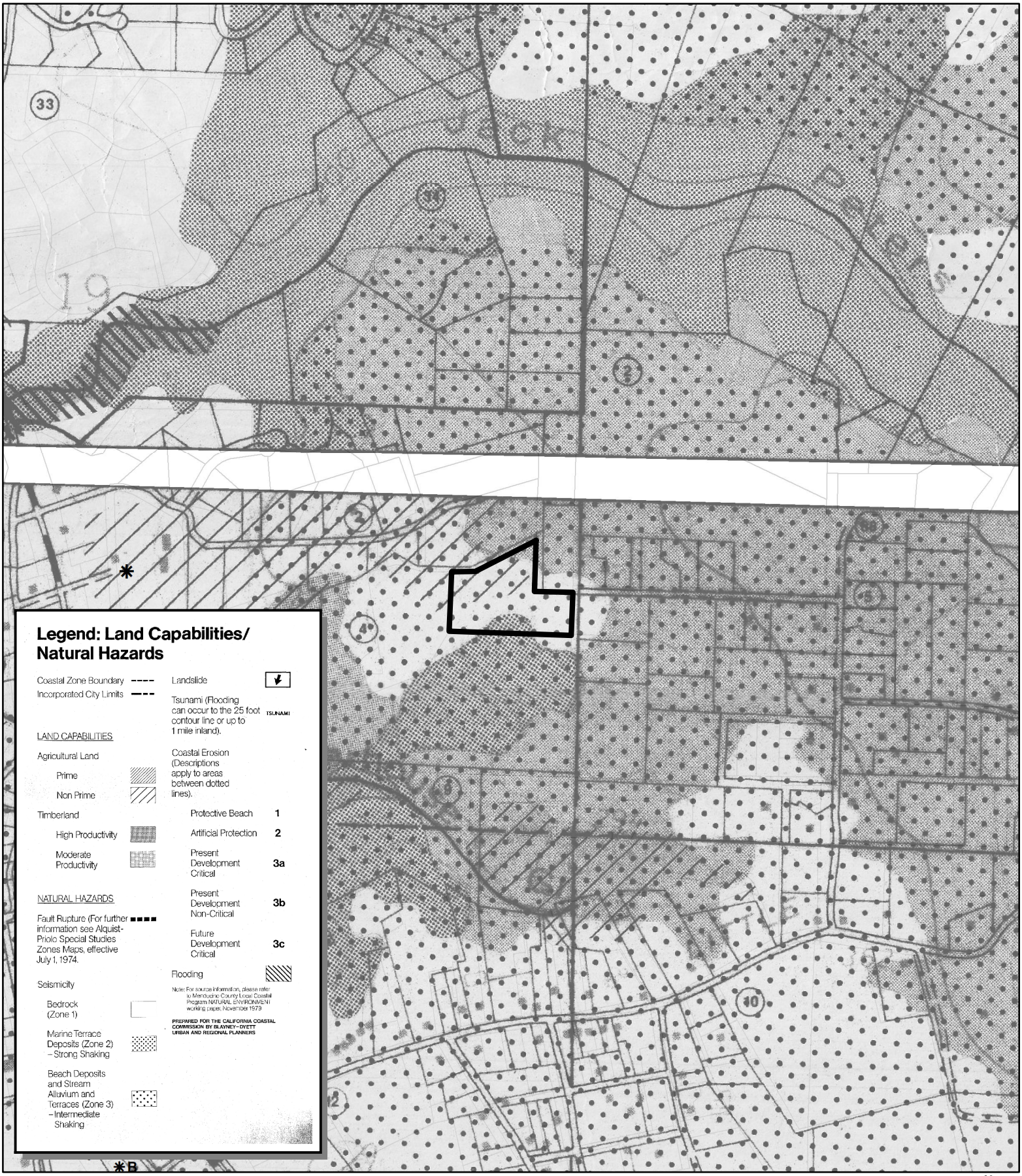
0 362.5 725 Feet
0 0.05 0.1 Miles

N W E S

1:8,000

LCP LAND USE MAP 17: MENDOCINO

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

* Visitor_Accomodation_&_Services

*B Mendo Town B&Bs

Assessors Parcels

0 362.5 725 Feet
0 0.05 0.1 Miles

N W E S

1:8,000

LCP LAND CAPABILITIES & NATURAL HAZARDS

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DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

✱ Visitor_Accomodation_&_Services

✱B Mendo Town B&Bs

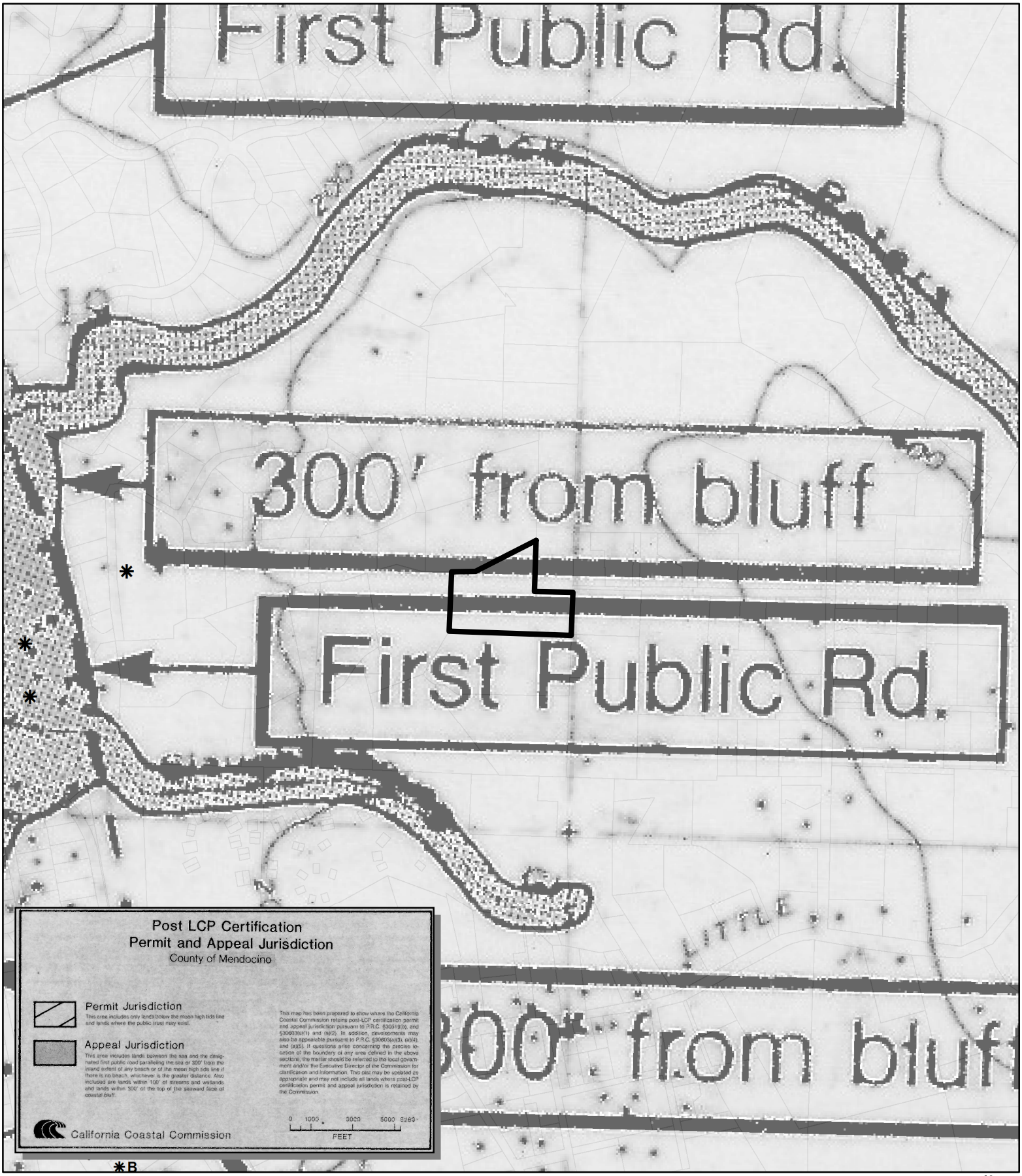
Assessors Parcels

0 362.5 725 Feet
0 0.05 0.1 Miles
1:8,000

N W E S

LCP HABITATS & RESOURCES

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

✱ Visitor_Accomodation_&_Services

✱B Mendo Town B&Bs

Assessors Parcels

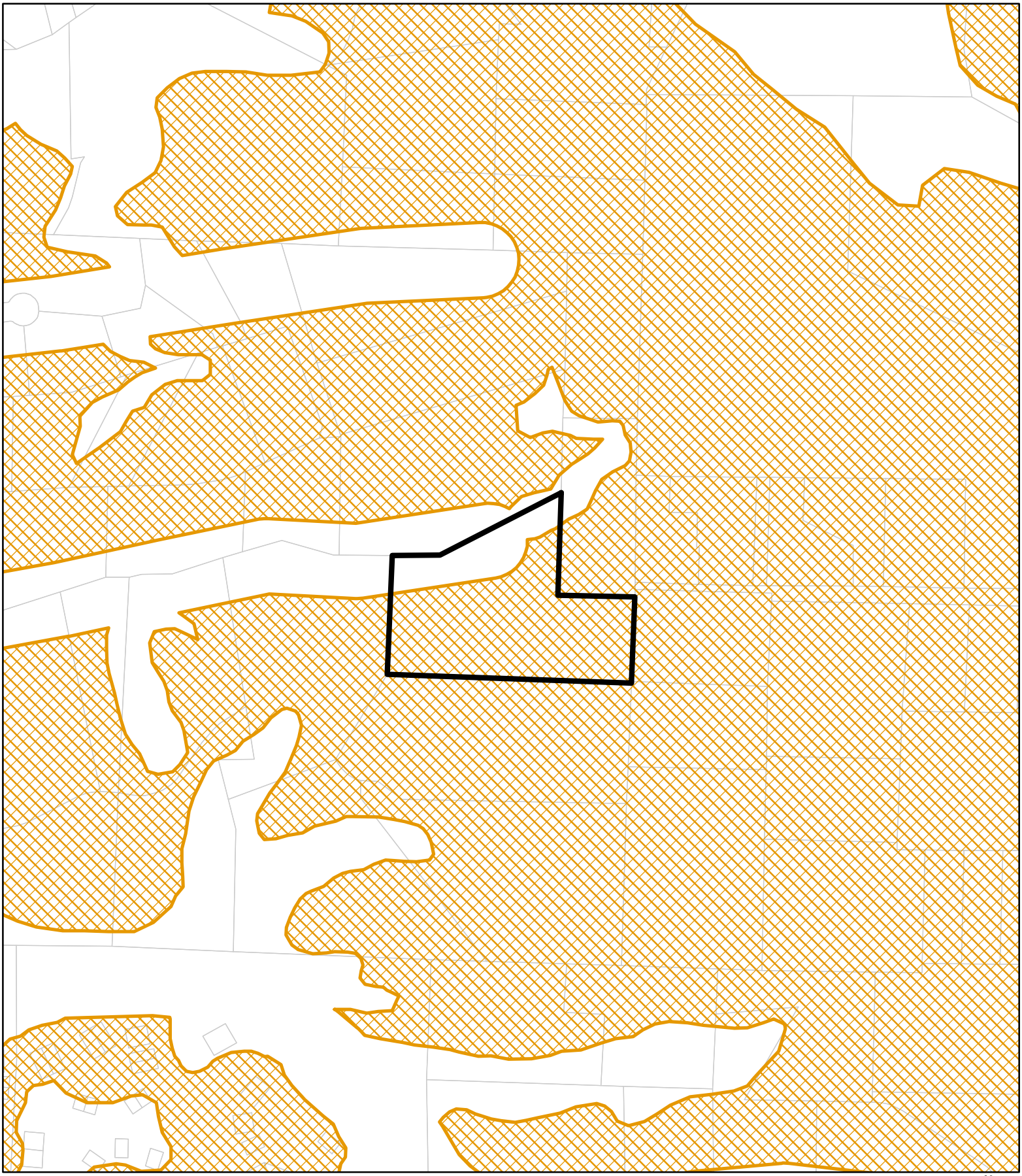
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0 0.05 0.1 Miles

N W E S

1:8,000

POST LCP CERTIFICATION & APPEAL JURISDICTION

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

CDP Exclusion Areas

Assessors Parcels

0 180 360 Feet

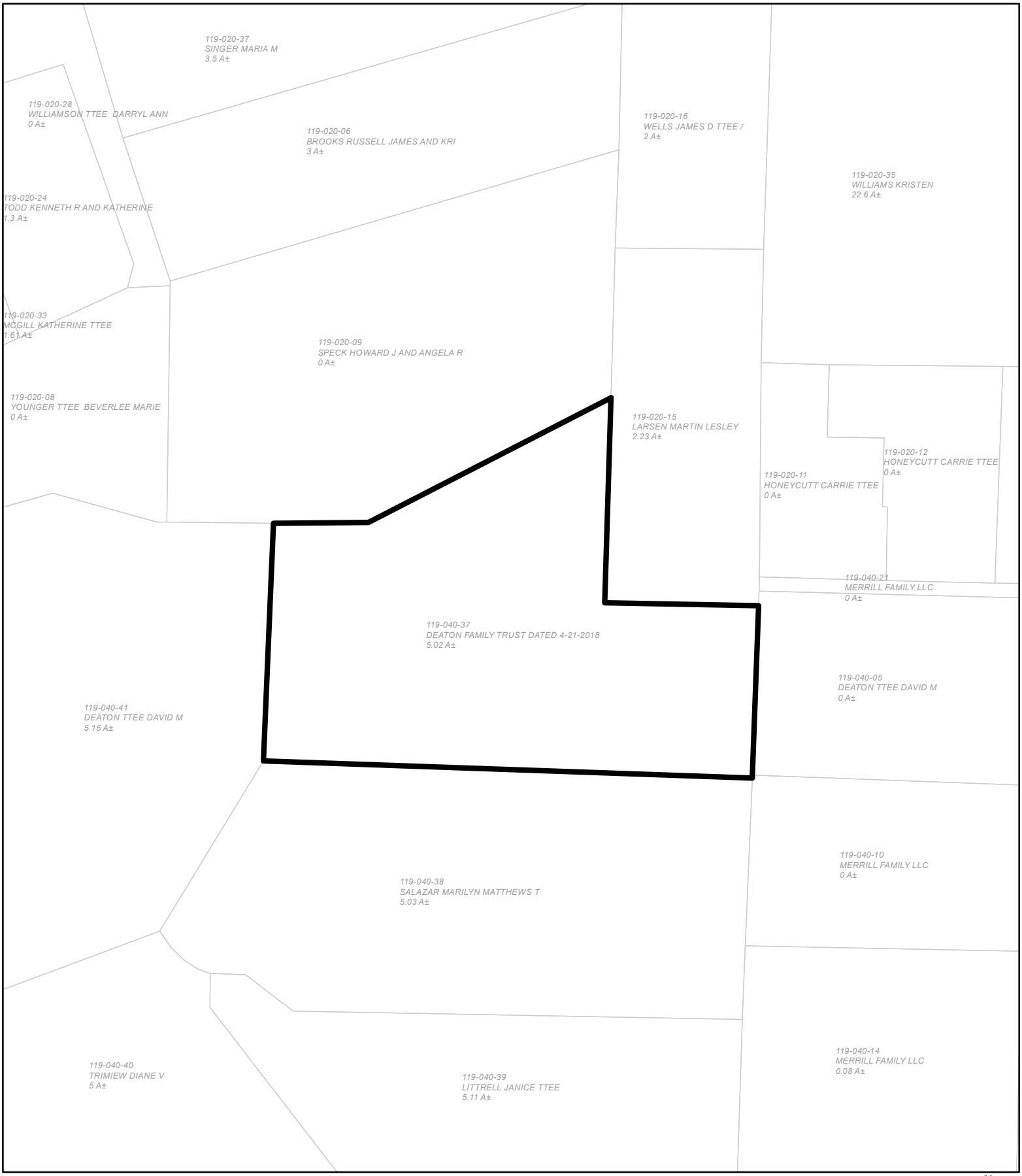
0 0.03 0.06 Miles

N W E S

1:4,000

CDP EXCLUSION AREA

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

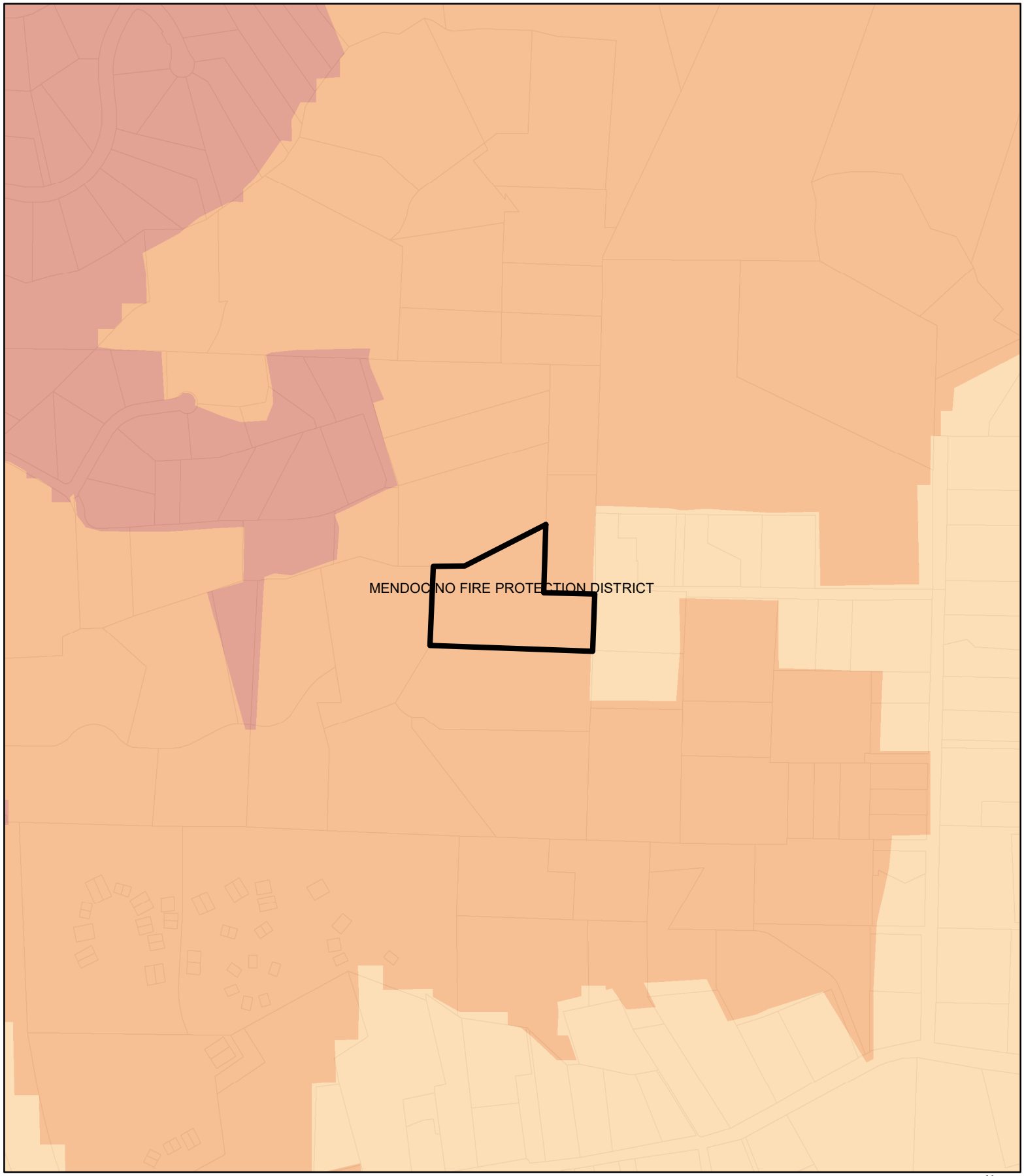
0 90 180 Feet
0 0.015 0.03 Miles

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1:2,000

ADJACENT PARCELS

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Very High Fire Hazard
High Fire Hazard
Moderate Fire Hazard
County Fire Districts
Assessors Parcels

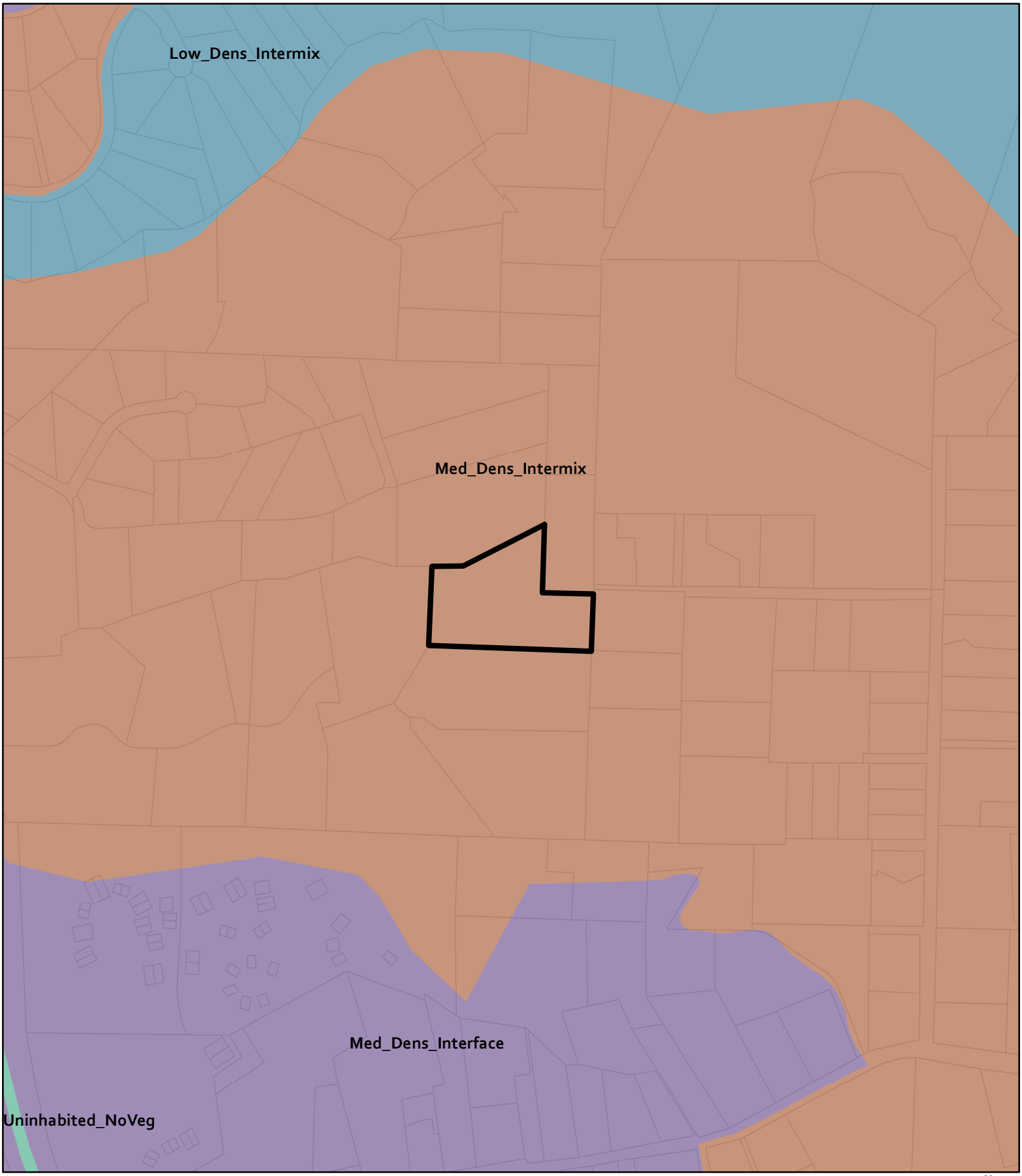
0 270 540 Feet
0 0.05 0.1 Miles

N
W E
S

1:6,000

FIRE HAZARD ZONES & RESPONSIBILITY AREAS
STATE RESPONSIBILITY AREA

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DO NOT USE THIS MAP TO DETERMINE LEGAL PROPERTY BOUNDARIES



CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

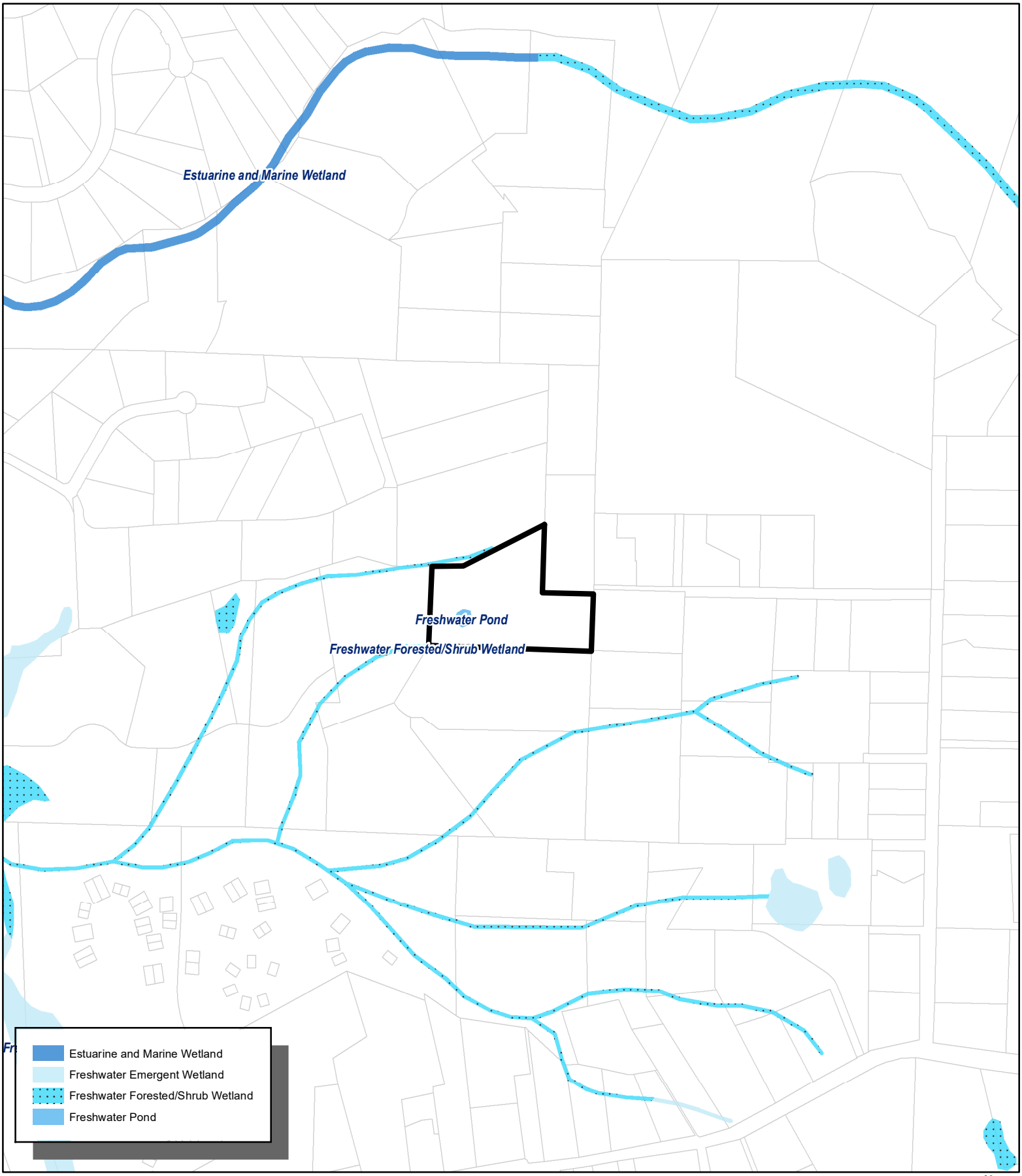
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0 0.05 0.1 Miles

N W E S

1:6,000

WILDLAND-URBAN INTERFACE

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

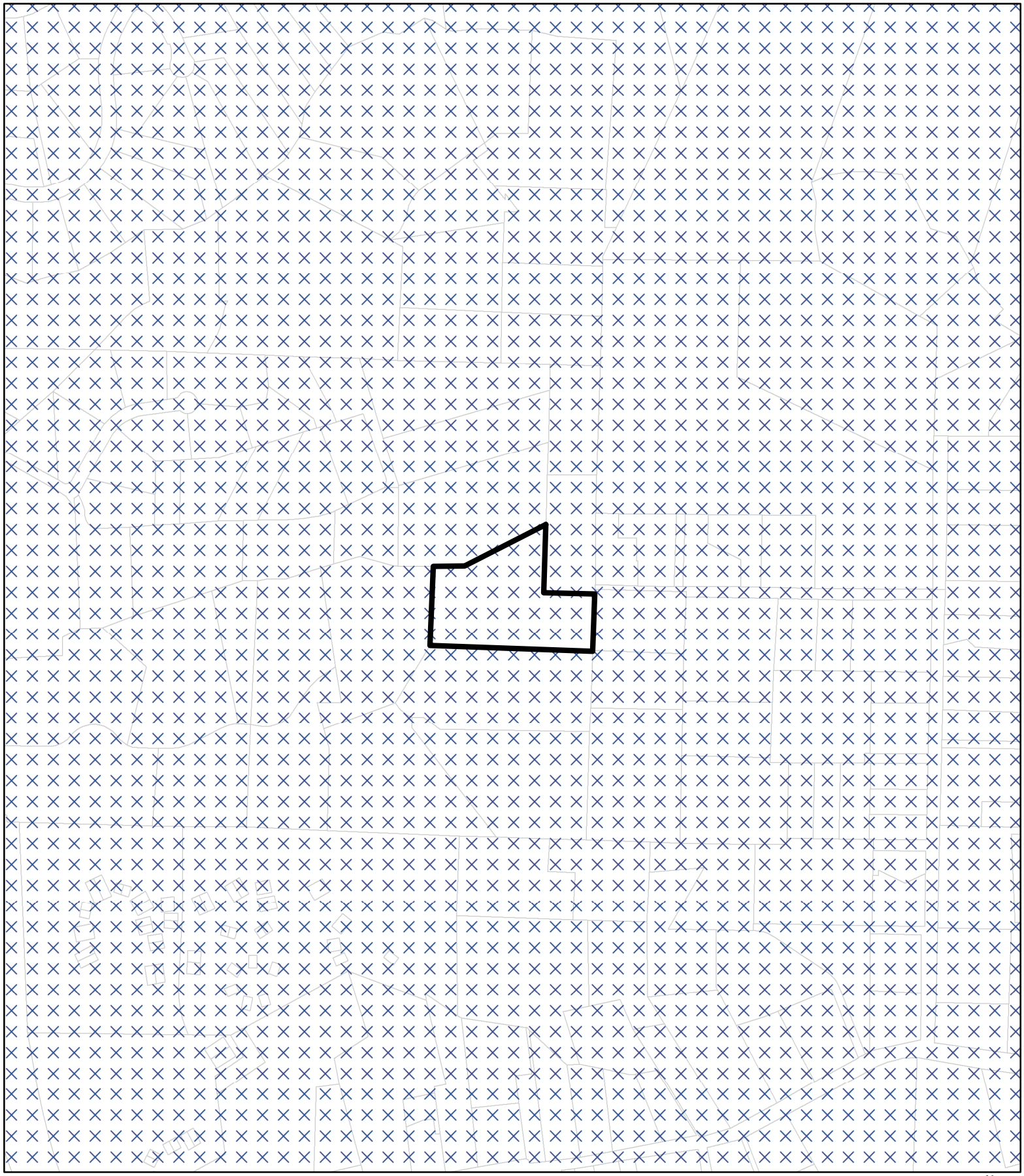
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N W E S

1:6,000

WETLANDS

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Critical Water Resources

Assessors Parcels

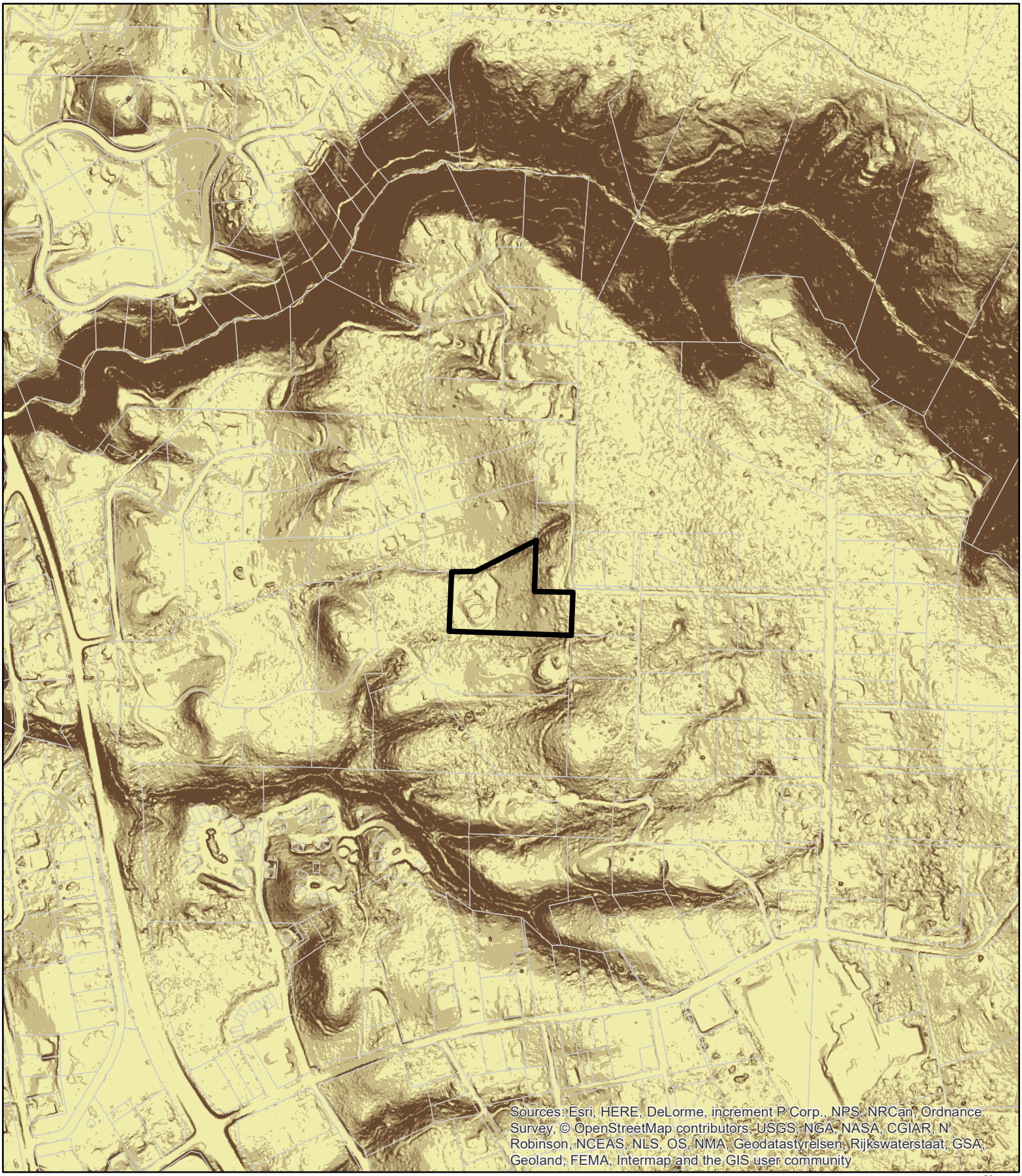
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COASTAL GROUND WATER RESOURCES

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels
0 - 10%
10% - 20%
20% - 30%
30% - 40%
40% - 50%

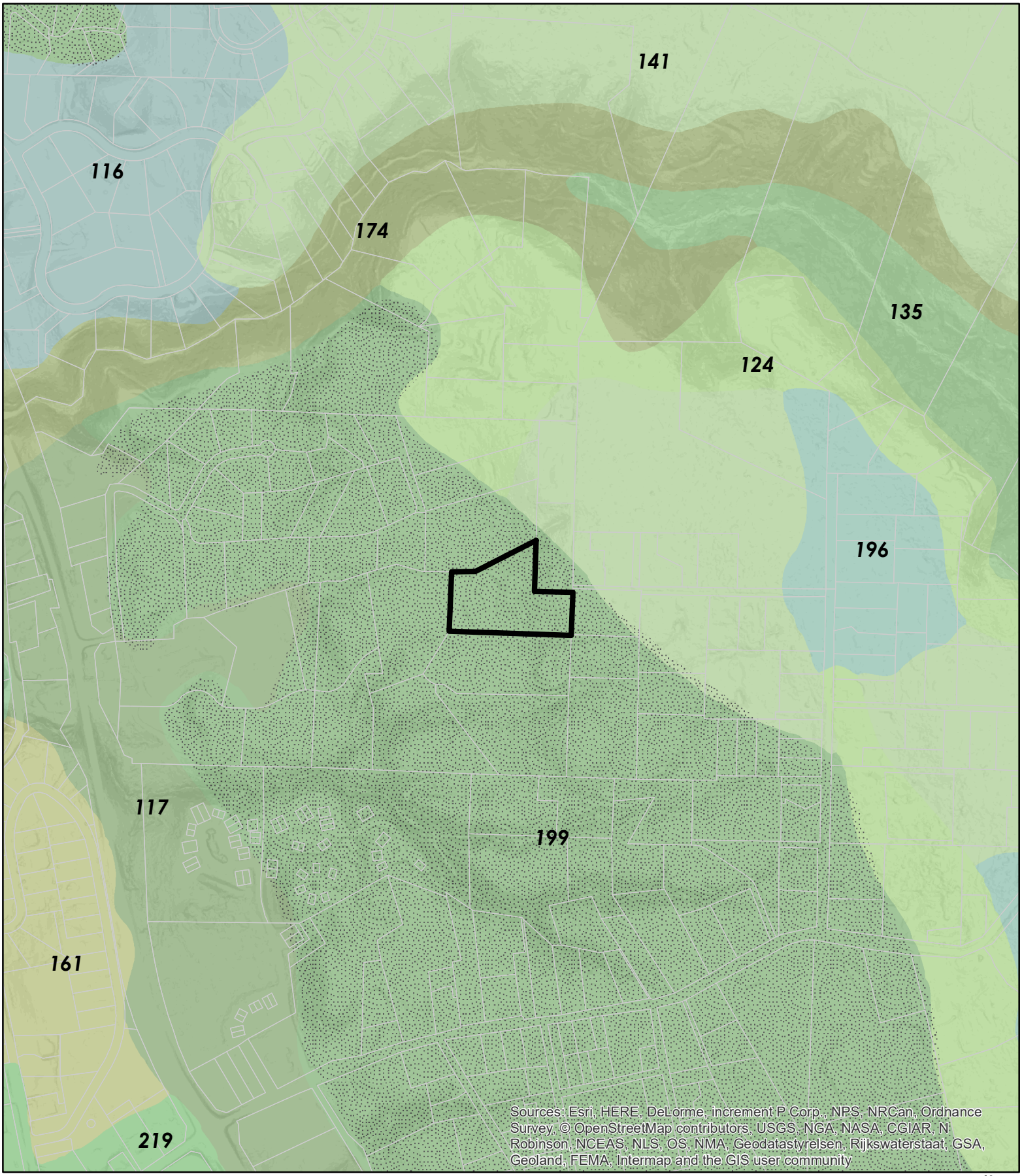
0 362.5 725 Feet
0 0.05 0.1 Miles

N
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S

1:8,000

ESTIMATED SLOPE

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

Shinglemill-Gibney Complex

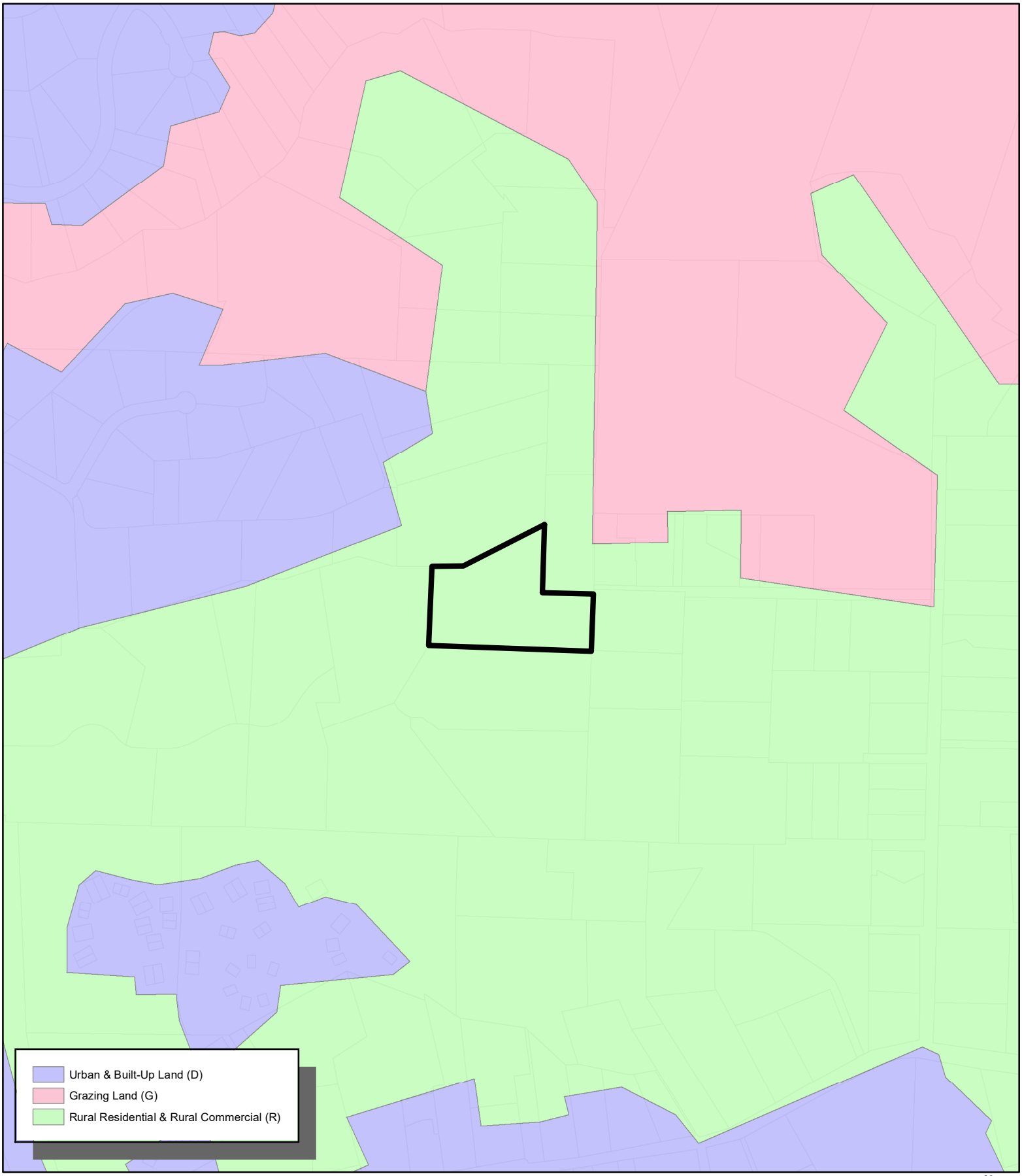
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WESTERN SOIL CLASSIFICATIONS

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APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

0 270 540 Feet
0 0.05 0.1 Miles

N W E S

1:6,000

IMPORTANT FARMLANDS

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

School Buildings

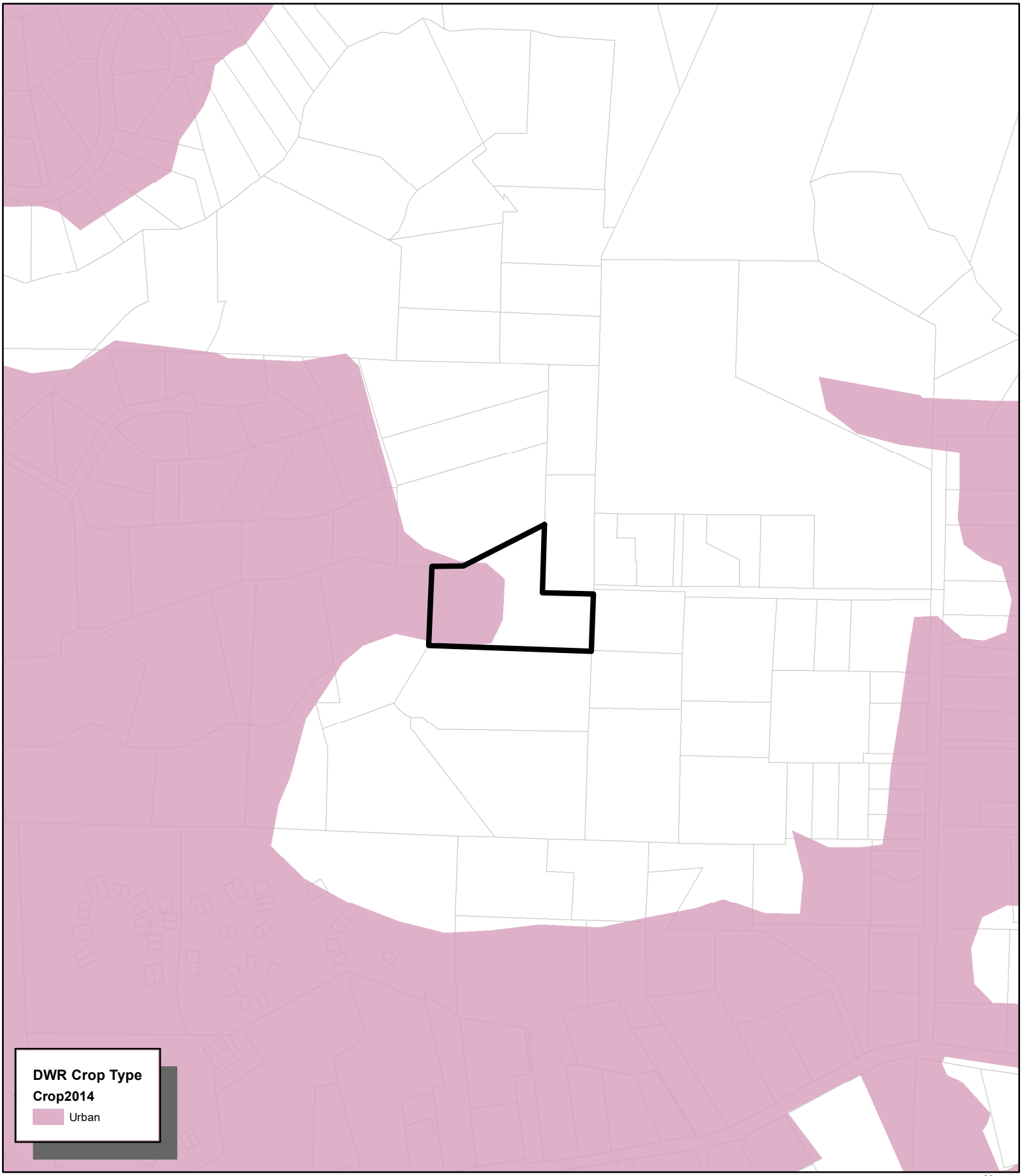
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0 0.05 0.1 Miles

N W E S

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SCHOOL DISTRICT

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CASE: CDP 2025-0020
OWNER: DEATON, David
APN: 119-040-37
APLCT: David Deaton
AGENT: AUM Construction Inc.
ADDRESS: 44650 Raven Lane

Assessors Parcels

0 270 540 Feet
0 0.05 0.1 Miles

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1:6,000

CROP TYPES

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Graening & Associates, LLC
343 Carpenter Hill Road, Folsom CA 95630

TECHNICAL MEMO: Proposed Mitigation Measures for the A.D.U. at 44650 Raven Lane, Mendocino

August 12, 2025

Introduction

The California Coastal Commission (CCC) is requiring retroactive permitting and mitigation for an ADU installed on a 5.5-acre parcel located at 44650 Raven Lane, Mendocino, California. The ADU (cabin) was inadvertently installed too close to a channel (see Exhibits). The California Coastal Commission typically requires a 100-foot setback from wetlands and channels to protect these sensitive areas. However, this setback distance can be adjusted based on specific site conditions and the nature of the wetland or channel. The project biologist (Dr. Geo Graening) is proposing mitigation measures to address biological impacts while allowing the ADU to remain in its current location.

Biological Setting

The Property contains two vegetation community types: coastal coniferous forest and ruderal/developed. The Property land use is rural residential and has been developed with structures, graveled/mulched/paved driveways, and landscaping; these portions of the Property were converted from natural habitat many years ago. A formal aquatic resources delineation was completed in April 2025:

- Graening and Associates, LLC. 2025. Aquatic Resource Delineation Report For The Property At 44650 Raven Lane, Mendocino, California. 41 pp.

Based upon these criteria, 3 features within the Property were determined to be potentially subject to USACE jurisdiction (see Exhibits):

- an intermittent channel on the northern property boundary; and
- an intermittent channel on the southern property boundary (the waterbody in question)
- a riverine wetland adjacent to the intermittent channel on the southern property boundary

Impact Analysis

The channel in question was not directly impacted by placement of the ADU. The ADU is setback from the channel by about 10 to 15 feet. The channel could be impacted indirectly by:

- polluted stormwater discharge (petroleum products from leaking vehicles, pesticides, herbicides, sediment)
- invasive species planted for landscaping.

Mitigation Plan

The proposed mitigation is the following:

- create a berm to separate the channel from receiving any stormwater associated with the ADU and driveway (see Exhibits)
- require the berm and area around the ADU to be planted in native species (riparian shrubs) and any non-native species removed

- enhance an existing nearby wetland to compensate for any indirect impacts caused by the ADU placement by the planting of native marsh species to increase species richness and hydrophyte dominance, and the removal of non-native species
- periodic biological monitoring to ensure the success of the mitigation plan

Table 1 presents the suggested plant palette for all new plant installations.

Table 1. Restoration Plan Plant Palette

Species Name	Common Name
RIPARIAN SHRUBS	
Athyrium filix-femina	lady fern
Polystichum californicum	California swordfern
Polystichum munitum	western sword fern
Pteridium aquilinum	northern bracken fern
Rhododendron sp.	rhododendron
Rubus spp.	native berry
Salix spp.	native willows
Sambucus racemosa	red elderberry
Vaccinium ovatum	evergreen huckleberry
MARSH PLANTS	
Berula sp.	water parsnip
Cardamine spp.	native bittercress
Cyperus spp.	native sedges
Deschampsia sp.	native hairgrass
Equisetum spp.	native horsetail
Iris douglasiana	Douglas Iris
Juncus spp.	native rush

Conclusions

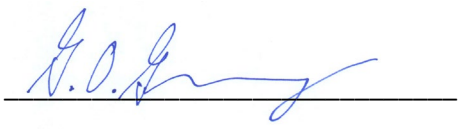
The proposed mitigation plan should achieve the following goals:

- ensure that potential polluted stormwater does not enter the channel
- enhance the biological value of the adjacent wetland
- increase native species richness and diversity.

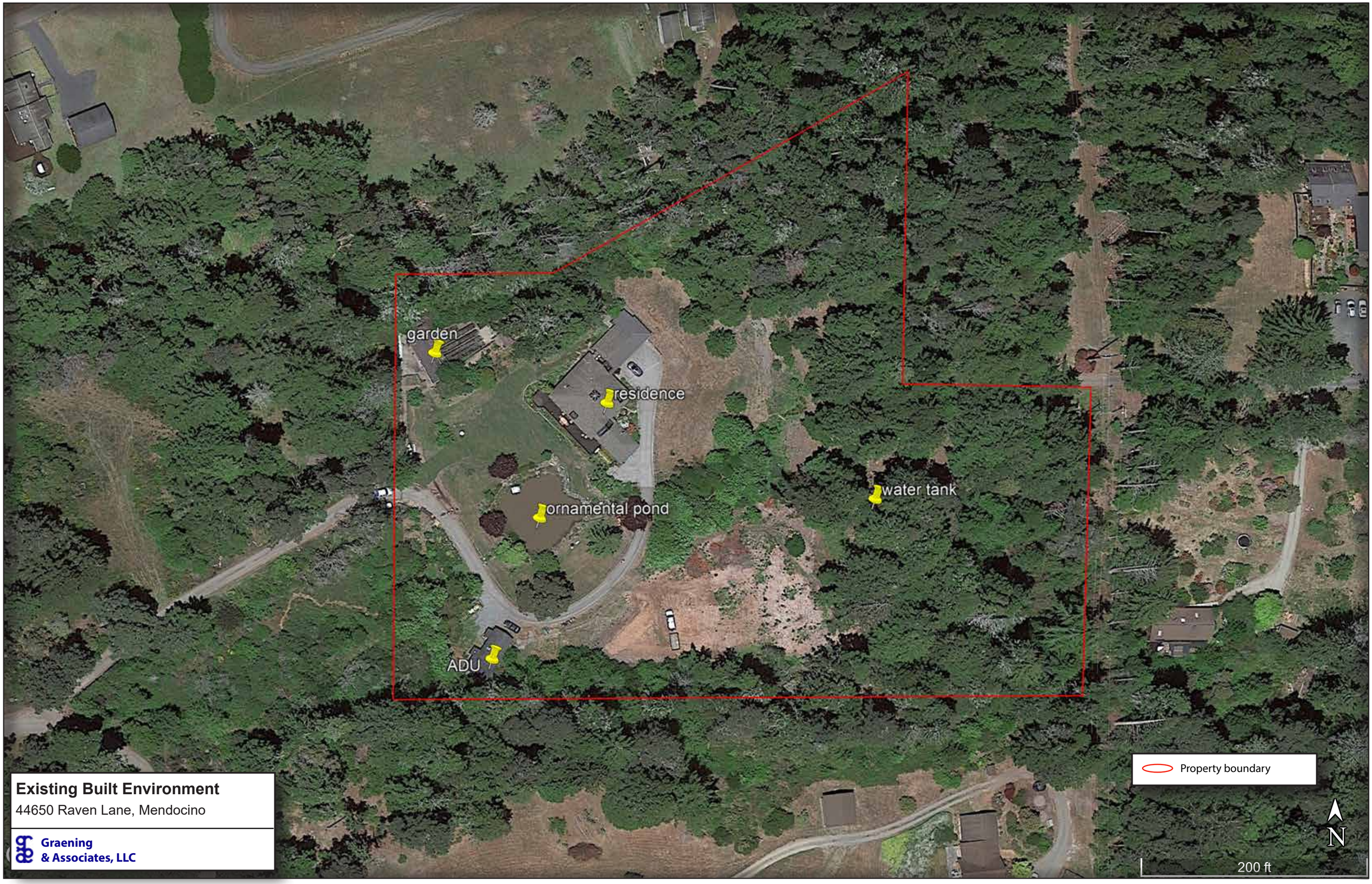
Implementation of this mitigation plan should compensate for any indirect impacts to the channel caused by placement of the ADU within the buffer zone.

AUTHOR

Dr. Gary O. “Geo” Graening
Principal Biologist
Graening & Associates, LLC



EXHIBITS



Existing Built Environment

44650 Raven Lane, Mendocino

Graening
& Associates, LLC

Aquatic Resources Classification			Aquatic Resource Size		
Aquatic Resource Name	**Cowardin**	**Location (Lat/Long)**	**(sq. ft.)**	**(acre)**	**(linear feet)**
Channels					
channel section, north	R4SB	39.3176, -123.7914	536	0.012	134
		Total Channels	**536**	**0.012**	**134**
Wetlands					
marsh	PEM1	39.3167, -123.7905	2082	0.048	
		Total Wetlands	**2082**	**0.048**	

39.3181, -123.7900

Upland

Wetland

ADU

39.3167, -123.7916

Aquatic Resources Delineation Map

44650 Raven Lane, Mendocino

Delineator: Dr. G.O. Graening, April 7, 2025

Graening & Associates, LLC

Parcel Boundary

Data Points

Jurisdictional Features

Channel

Marsh

Non-Jurisdictional Features

Pond

Upland swales

Pipe culverts

N

200 ft

44650

ADU

Proposed berm

Proposed wetland restoration

Proposed Mitigation

44650 Raven Lane, Mendocino

Graening & Associates, LLC

Property boundary | Channel | Marsh | Pond | Upland swales | Pipe culverts

N

100 ft

Graening & Associates, LLC
343 Carpenter Hill Road, Folsom CA 95630

REPORT OF COMPLIANCE
A.D.U. at 44650 Raven Lane, Mendocino

October 22, 2025

Introduction

An ADU was installed on a 5.5-acre parcel located at 44650 Raven Lane, Mendocino, California. The ADU (cabin) was inadvertently installed too close to an intermittent channel (see Exhibits). Pursuant to Mendocino County Code, the County typically requires a 100-foot buffer area from wetlands and channels to protect these environmentally sensitive habitat areas (ESHAs). The County required the landowner to contract a biologist for a Report of Compliance, as required by Sec. 20.532.060 - Environmentally Sensitive Habitat Area—Supplemental Application Procedures [Ord. No. 3785 (part), adopted 1991]. Additional project information shall be required for development within an ESHA and may be required for any development within five hundred (500) feet of an ESHA if the development is determined to have the potential to impact an ESHA. This Report of Compliance is based upon an on-site investigation which demonstrates that the development meets all of the criteria specified for development in, and proximate to, an ESHA. This Report is structured by the items listed in the Ordinance. including a description and analysis of the following performed by a qualified professional.

(1) Present extent of the habitat, and if available, maps, photographs or drawings showing historical extent of the habitat area.

A formal aquatic resources delineation was completed in April 2025:

- Graening and Associates, LLC. 2025. Aquatic Resource Delineation Report For The Property At 44650 Raven Lane, Mendocino, California. 41 pp.

The Property contains three ESHAs (see Exhibits):

- an intermittent channel on the northern property boundary;
- an intermittent channel on the southern property boundary; and
- a riverine wetland (freshwater emergent marsh) adjacent to the intermittent channel on the southern property boundary

The ADU is located within 100 feet of the intermittent channel on the southern property boundary. The ADU is farther than 100 feet from all other ESHAs.

(2) Previous and existing ecological conditions.

(a) The life history, ecology and habitat requirements of the relevant resources, such as plants, fish and wildlife, in sufficient detail to permit a biologist familiar with similar systems to infer functional relationships (the maps described in above may supply part of this information).

(b) Restoration potentials.

The Property contains two vegetation community types: coastal coniferous forest and ruderal/developed. The Property land use is rural residential and has been developed with structures, graveled/mulched/paved driveways, and landscaping; these portions of the Property were converted from natural habitat many years ago.

(3) Present and potential adverse physical and biological impacts on the ecosystem.

The intermittent channel on the southern property boundary was not directly impacted by placement of the ADU. The ADU is setback from the channel by about 10 to 15 feet. The channel could be impacted indirectly by:

- polluted stormwater discharge (such as petroleum products from leaking vehicles, pesticides, herbicides, or sediment)
- invasive species planted for landscaping.

(4) Alternatives to the proposed development, including different projects and alternative locations.

The ADU (cabin) has already been established at its current location. The only alternative would be to relocated it to a different location on the Property. Relocation would be prohibitively expensive and require the removal of expensive landscaping or native coastal forest.

(5) Mitigation measures, including restoration measures and proposed buffer areas.

A mitigation plan was developed by Graening and Associates, LLC. The proposed mitigation is the following:

- create an earthen berm to separate the channel from the ADU to protect the channel from receiving any stormwater associated with the ADU and driveway (see Exhibits)
- require the berm and area around the ADU to be planted in native species (riparian shrubs) and any non-native species removed
- enhance an existing nearby wetland to compensate for any indirect impacts caused by the ADU placement by the planting of native marsh species to increase species richness and hydrophyte dominance, and the removal of non-native species
- periodic biological monitoring to ensure the success of the mitigation plan

Implementation of the proposed mitigation plan should achieve the following goals:

- ensure that potential polluted stormwater does not enter the channel
- enhance the biological value of the adjacent wetland
- increase native species richness and diversity.

Implementation of this mitigation plan should compensate for any indirect impacts to the channel caused by placement of the ADU within the buffer zone.

(6) If the project includes dredging, explain the following…

not applicable

(7) If the project includes filling…..

not applicable

(8) If the project includes diking...

not applicable

(9) If the project is adjacent to a wetland and may cause mud waves...

not applicable

(10) Benchmark and survey data used to locate the project, the lines of highest tidal action, mean high tide...

not applicable

(11) Other governmental approvals as required and obtained. Indicate the public notice number of Army Corps of Engineers permit if applicable.

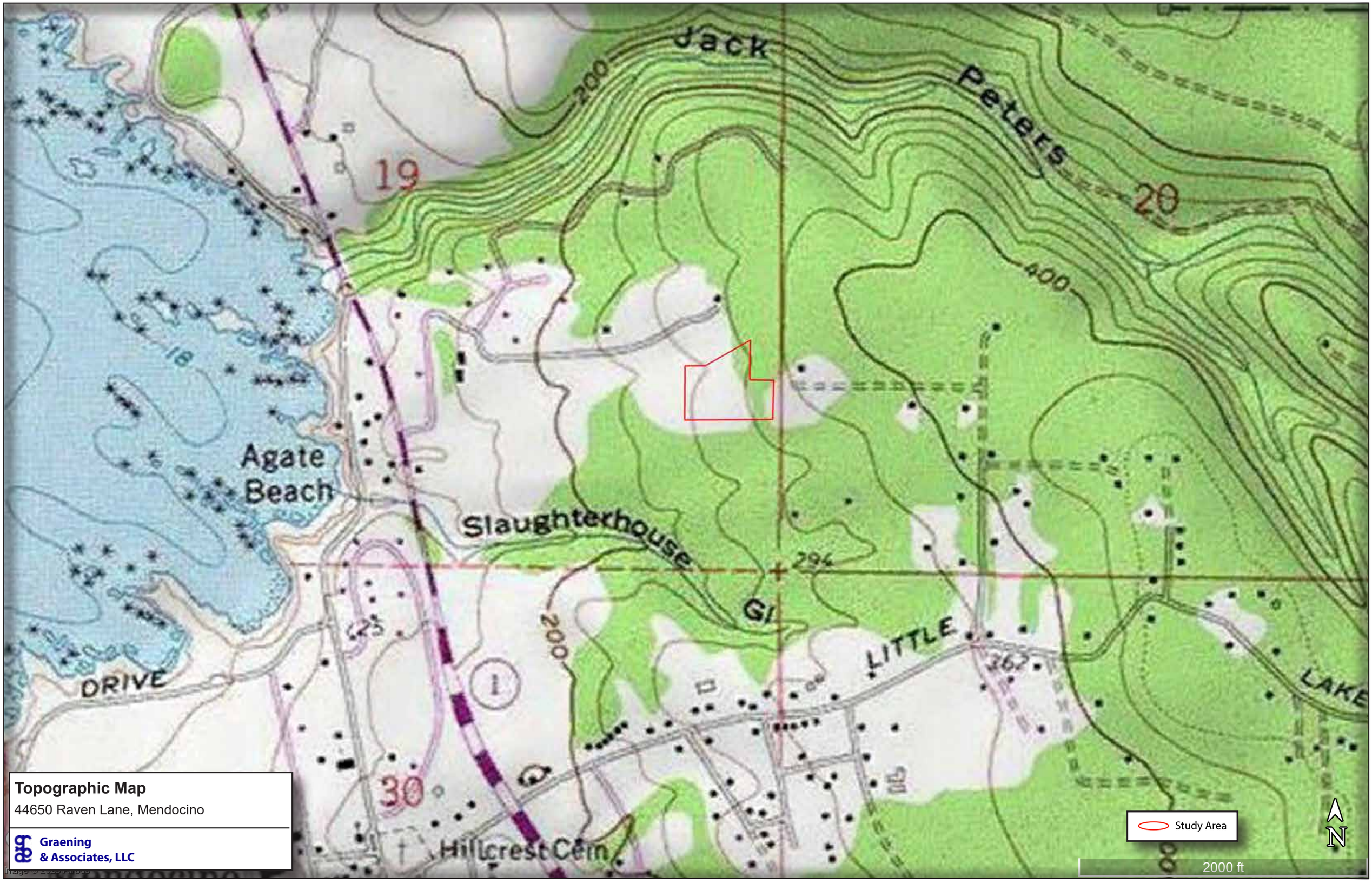
No other government approvals are needed. An Army Corps of Engineers permit is not needed because the ADU did not impact the channel Ordinary High Water Mark.

AUTHOR
Dr. Gary O. “Geo” Graening
Principal Biologist
Graening & Associates, LLC



EXHIBITS

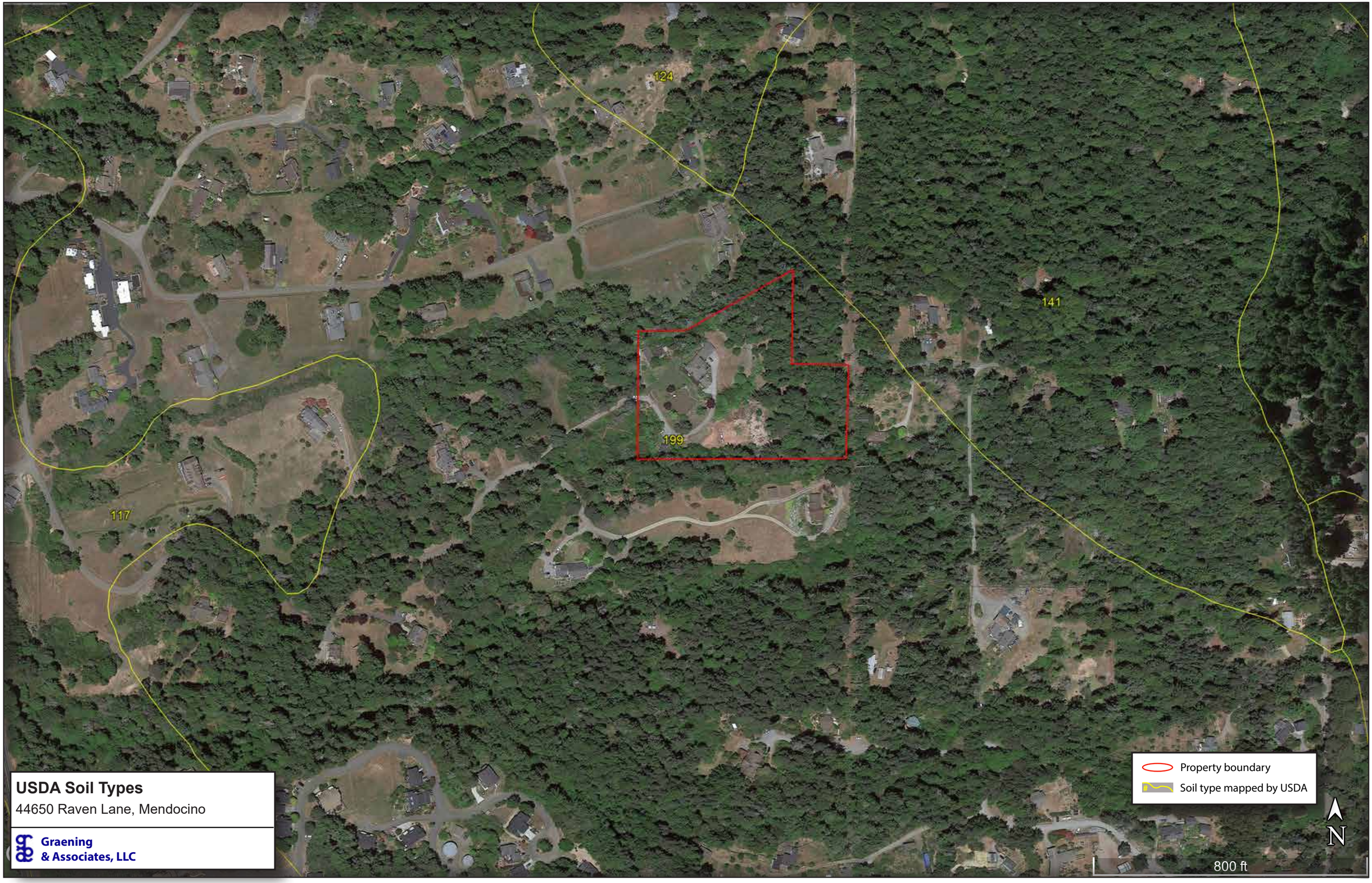
Topographic Base Map
Inundation Map
Vegetation Map
Soils Map
ESHA and Buffers
Mitigation Plan



Topographic Map

44650 Raven Lane, Mendocino

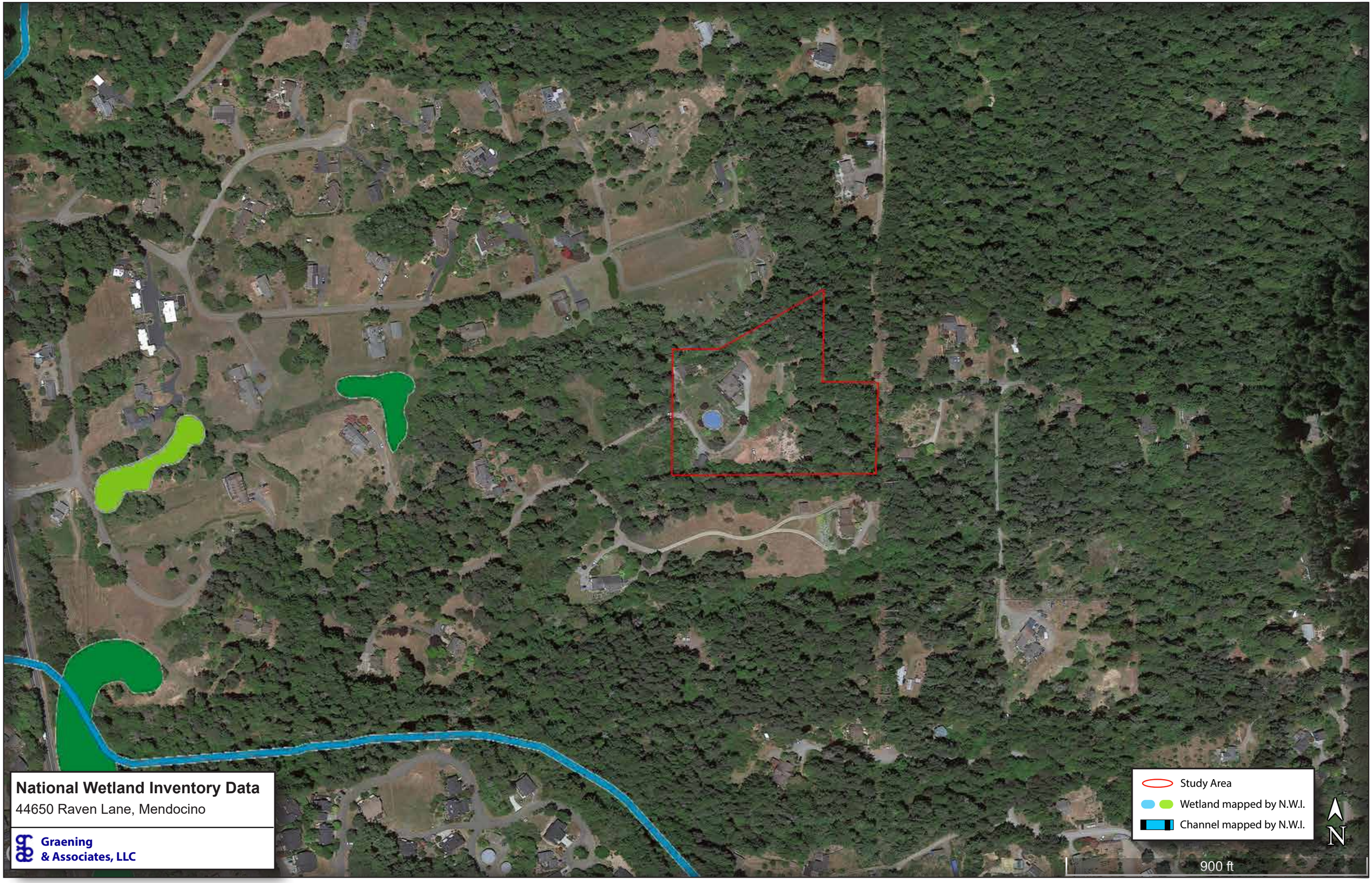
Graening
& Associates, LLC



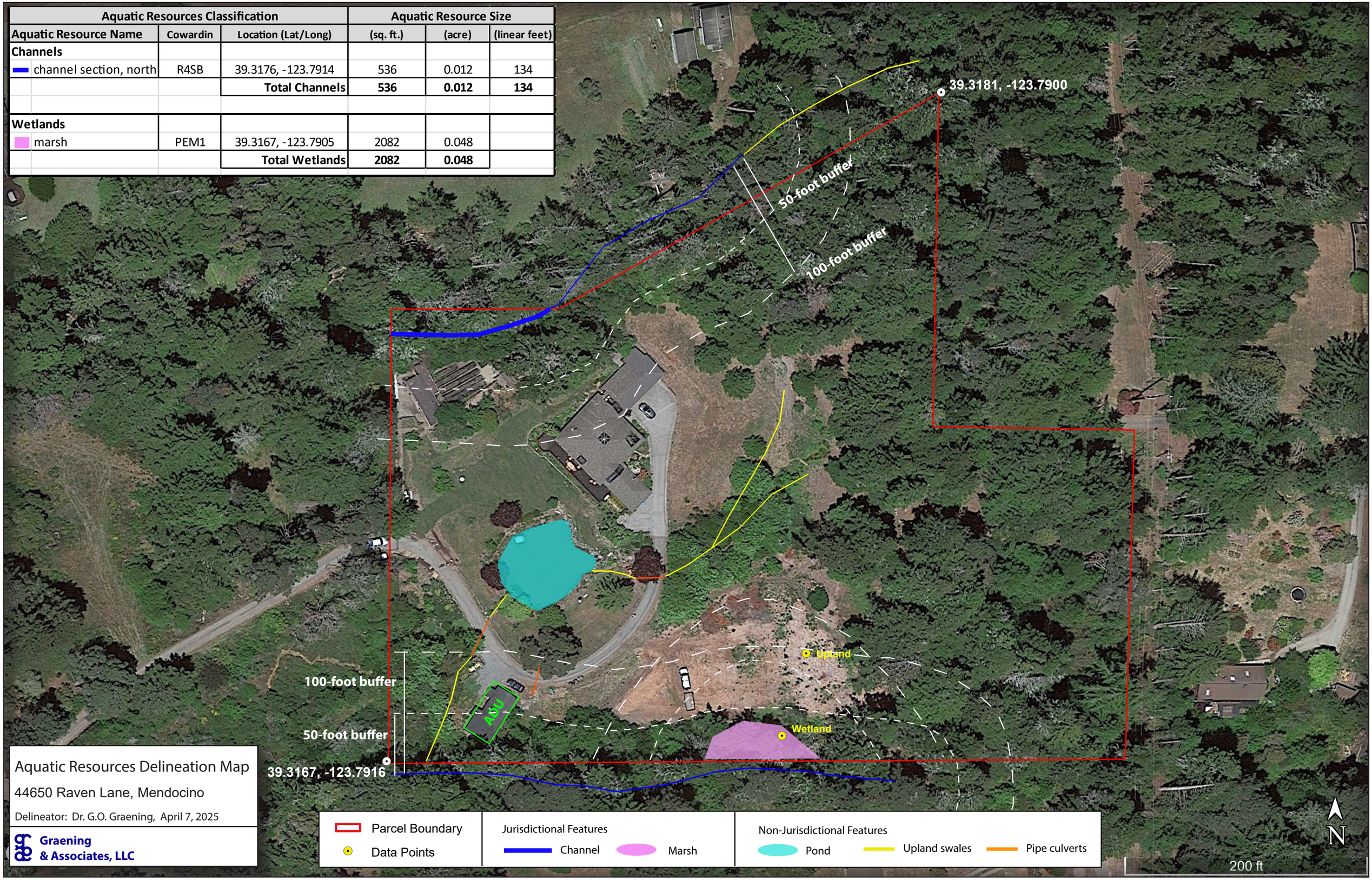
USDA Soil Types

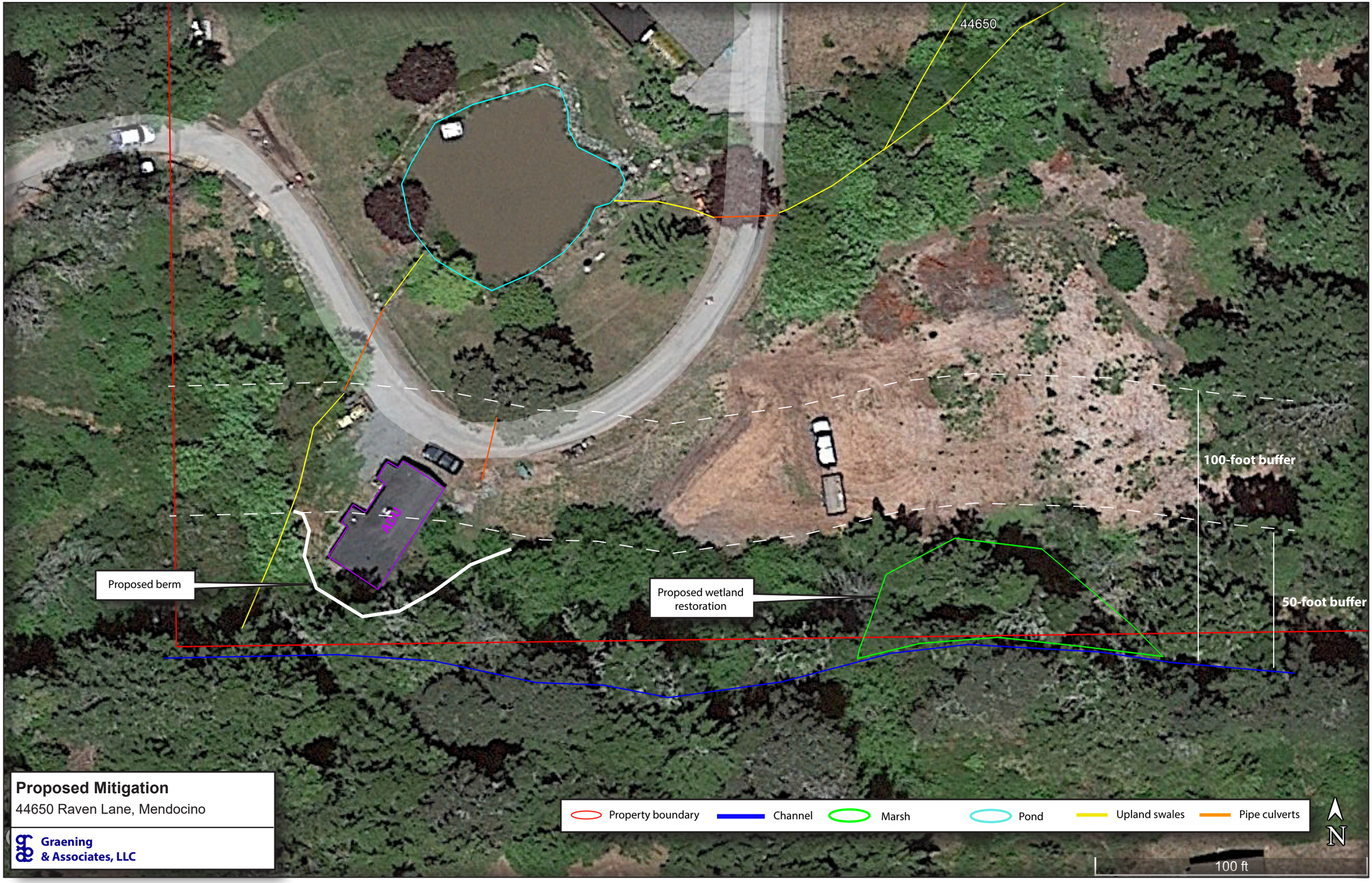
44650 Raven Lane, Mendocino

Graening & Associates, LLC


National Wetland Inventory Data
44650 Raven Lane, Mendocino
Graening
& Associates, LLC
Study Area
Wetland mapped by N.W.I.
Channel mapped by N.W.I.
N
900 ft

Aquatic Resources Classification			Aquatic Resource Size		
Aquatic Resource Name	**Cowardin**	**Location (Lat/Long)**	**(sq. ft.)**	**(acre)**	**(linear feet)**
Channels					
channel section, north	R4SB	39.3176, -123.7914	536	0.012	134
		Total Channels	**536**	**0.012**	**134**
Wetlands					
marsh	PEM1	39.3167, -123.7905	2082	0.048	
		Total Wetlands	**2082**	**0.048**	





Proposed Mitigation

44650 Raven Lane, Mendocino

Graening & Associates, LLC

AQUATIC RESOURCE DELINEATION REPORT FOR THE PROPERTY AT 44650 RAVEN LANE, MENDOCINO, CALIFORNIA

April 4, 2025

Prepared by:

Graening and Associates, LLC
343 Carpenter Hill Road, Folsom CA 95630

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1. INTRODUCTION

1.1. Purpose and Scope

Graening and Associates, LLC conducted a formal delineation of jurisdictional water bodies on the 5.5-acre parcel located at 44650 Raven Lane, Mendocino, California (the Study Area)(see Exhibits). This report presents the results of the field survey conducted in accordance with the USACE Wetlands Delineation Manual to determine which portions of this property may qualify as potentially jurisdictional waters of the United States (including wetlands). USACE is ultimately responsible for determining the limits of their jurisdiction, and this report has been prepared to assist the USACE with their determination.

1.2. REGULATORY SETTING

Real property in California that contains water resources is subject to various federal and state regulations, and activities occurring in these water resources may require permits, licenses, variances, or similar authorization from federal, state and local agencies. Following is a brief, but not exhaustive, summary of such regulations, as they apply particularly to field delineations of jurisdictional waterbodies.

1.2.1. Federal Regulations

At the federal level, the Federal Water Pollution Control Act, more commonly referred to as the Clean Water Act (CWA) (33 United States Code [USC] 1344), is the primary law regulating wetlands and surface waters. In Section 404 of the CWA, waters of the US are defined as: all waters used in interstate or foreign commerce; all interstate waters including interstate wetlands; all other waters such as intrastate lakes, rivers, streams (including intermittent and ephemeral streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes or natural ponds, where the use, degradation, or destruction of which could affect interstate commerce; impoundments of these waters; tributaries of these waters; or wetlands adjacent to these waters (33 CFR Part 328). With non-tidal waters, in the absence of adjacent wetlands, the extent of federal jurisdiction is defined by the ordinary high water mark - the line on the shore established by the fluctuations of water, and indicated by a clear, natural line impressed on the bank, shelving, changes in soil character, destruction of terrestrial vegetation, or the presence of litter and debris. Wetlands are defined as: "…*those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions*." (Federal Register 1980, 1982).

Any person, firm, or agency planning to alter of work in navigable waterbodies, including the discharge of dredged or fill material, must first obtain authorization from the United States Army Corps of Engineers (USACE). Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403) prohibits the obstruction or alteration of navigable waters of the US without a permit from USACE. Section 301 of the Federal Water Pollution Control Act, as amended ("Clean Water Act") prohibits the discharge of pollutants, including dredged or fill material, into waters of the US without a Section 404 permit from USACE (33 USC 1344). If the proposed project involves species (or their habitat) listed under the federal Endangered Species Act of 1973, USACE must initiate consultation with USFWS or National Marine Fisheries Service pursuant to Section 7 (16 USC 1536; 40 CFR Part 402). Wetland features that exhibit vernal pool characteristics may be protected under the federal Endangered Species Act or California Endangered Species Act, because several crustaceans listed as threatened or endangered are dependent upon vernal pool habitat.

Under CWA Section 401, every applicant for a federal permit or license for any activity which may result in a discharge to a water body must obtain certification that the proposed activity will comply with State water quality standards. The applicable Regional Water Quality Control Board must certify that a USACE Section 404 Permit action meets state water quality objectives by issuing a Water Quality Certification. California Department of Fish and Game provides comment on USACE permit actions under the Fish

and Wildlife Coordination Act. Under CWA Section 402, any construction project that disturbs at least one acre of land requires enrollment in the State's construction general permitting program under the National Pollutant Discharge Elimination System and implementation of a storm water pollution prevention plan.

The United States Environmental Protection Agency (USEPA) and USACE (2008) issued joint guidance regarding Clean Water Act jurisdiction following the decision in the consolidated cases of Rapanos v. United States and Carabell v. United States. USACE and USEPA will assert jurisdiction over traditional navigable waters, and non-navigable tributaries that have relatively permanent flow, and adjacent wetlands. The agencies will decide jurisdiction on a case-by-case basis for non-navigable tributaries that do not have relatively permanent flow, and adjacent wetlands, based upon significant nexus criteria (Kennedy Test, Scalia Test). The agencies generally will not assert jurisdiction over ditches, swales or other erosional features, or isolated wetlands.

1.2.2. State Regulations

Waters of the State are regulated primarily under the California Water Code and the California Code of Regulations Title 23: Water and Title 27: Environmental Protection. All water features in California, on public and private lands, in both natural and artificial channels, including isolated wetland features and impermanent drainages that are not claimed as waters of the US, are considered waters of the State. Waters of the State are protected under the Porter-Cologne Water Quality Control Act (California Water Code, Division 7: Water Quality) and are regulated by the State Water Resources Control Board (SWRCB) and its 9 Regional Water Quality Control Boards.
All parties proposing to discharge materials that could affect waters of the State must file a report of waste discharge with the appropriate regional board. The regional board will then respond to the report by issuing waste discharge requirements (WDRs) in a public hearing, or by waiving WDRs (with or without conditions) for that proposed discharge. Both of the terms "discharge of waste" and "waters of the State" are broadly defined in the Porter-Cologne Act, such that discharges of waste include fill, any material resulting from human activity (including construction), or any other "discharge" that may directly or indirectly impact waters of the State.

Additional statewide regulations that protect wetlands and riparian areas include the Wetlands Conservation Policy (Executive Order W-59-93), also known as the State's "No Net Loss" Policy for Wetlands; and the Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (State Water Board Resolution No. 2004-0030).

California Fish and Game Code (§1600-1607, 5650F) protects fishery resources by regulating "...*any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake*." California Department of Fish and Wildlife (CDFW) requires notification prior to project commencement, and issuance of a Lake or Streambed Alteration Agreement, if a proposed project will result in the alteration or degradation of waters of the State. The limit of CDFW jurisdiction is currently interpreted to be the "stream zone", defined as "*that portion of the stream channel that restricts lateral movement of water*" and delineated at "*the top of the bank or the outer edge of any riparian vegetation, whichever is more landward*". CDFW reviews the proposed actions and, if necessary, submits to the applicant a proposal for measures to protect affected fish and wildlife resources. The final proposal that is mutually agreed upon by the CDFW and the applicant is the Streambed Alteration Agreement.

The California Coastal Act requires that most development avoid and buffer wetland resources (California Coastal Commission 2004, 2006). Policies include:

- Section 30231, which requires the maintenance and restoration (if feasible) of the biological productivity and quality of wetlands appropriate to maintain optimum populations of marine organisms and for the protection of human health.

- Section 30233, which limits the filling of wetlands to identified high priority uses, including certain boating facilities, public recreational piers, restoration, nature study, and incidental public services (such as burying cables or pipes). Any wetland fill must be avoided unless there is no feasible less environmentally damaging alternative, and authorized fill must be fully mitigated.

The California Coastal Commission (CCC)'s regulations establish a "one parameter definition" that only requires evidence of 1 of the 3 USACE parameters to establish wetland conditions:

"*Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats*." (14 CCR Section 13577).

1.3. ENVIRONMENTAL SETTING

The Study Area is located within the Outer North Coast Range geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters. The Study Area and vicinity is in Climate Zone 17: Marine effects in Southern Oregon and Northern California, defined by mild, wet, almost frostless winters and cool summers with frequent fog or wind (Sunset, 2024). The topography of the Study Area is a coastal terrace. The elevation ranges from approximately 270 to 400 feet above mean sea level. USDS maps one soil type in the Study Area: #199: Shinglemill-Gibney complex, 2 to 9 percent slopes. The geology is salt-affected marine terraces with eolian sand parent materials.

2. METHODOLOGY

2.1. PRELIMINARY DATA GATHERING AND RESEARCH

The delineation was conducted in accordance with the:

- 1987 Corps of Engineers Wetland Delineation Manual

- 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0). U.S. Army Engineer Research and Development Center Environmental Laboratory, Vicksburg, MS. 153 pp.

Methodology followed USACE and USEPA guidelines, and consisted of preliminary data gathering and research, field surveys, digital mapping, and documentation of final boundary determinations.

2.2. Determination Procedures

The purpose of the field determination was to: 1) identify any and all water features that are subject to federal jurisdiction (*i.e.*, waters of the US) within the Study Area; and 2) if present, determine the boundary of each water feature. The entire study area was assessed in such a manner as to view all areas to the degree necessary to determine the vegetation community types and the presence or absence of jurisdictional water features. Wetland field determination procedures followed the USACE *Wetlands Delineation Manual* technical guidelines for a Level 2 Routine Field Determination (Environmental Laboratory 1987). Additionally, the appropriate USACE regional supplement was also consulted.

The diagnostic environmental characteristics of hydrophytic vegetation, hydric soils, and wetland hydrology (i.e., 3-parameter approach) were used as the standard for determining if specific areas qualified as wetlands (Environmental Laboratory 1987). A subject area was determined to be a wetland if all 3 requisite characteristics were present; as a general rule, evidence of a minimum of one positive indicator for each parameter must be found in order to make a positive wetland determination.

Hydrophytic vegetation is defined as "...*the sum total of macrophytic plant life that occurs in areas where the frequency and duration of inundation or soil saturation produce permanently or periodically saturated soils sufficient in duration to exert a controlling influence on the plant species present*." (Environmental Laboratory 1987). Hydrophytic vegetation indicators included: prevalence of vegetation; majority of dominant plant species are obligate or facultative wetland plants (hydrophytes); morphological or physiological adaptations to saturated soil conditions; and species listed on the *National List of Plant Species that Occur in Wetlands* (USFWS 2006a) and the *Regional List* (Region 10) (USFWS 2006b). This National List divides plant species into categories based upon their frequency of occurrence in wetlands. These categories are: OBL = obligate wetland plants that occur almost always in wetlands under natural conditions (estimated probability greater than 99%); FACW = facultative wetland plants that usually occur in wetlands, but occasionally occur in non-wetlands (estimated probability 67 – 99%); FAC = facultative wetland plants that are equally likely to occur in wetlands or non-wetlands (estimated probability 34 – 66 %); FACU – facultative upland plants that usually occur in non-wetlands, but occasionally are found in wetlands (estimated probability 1 – 33 %); UPL = obligate upland plants that almost always occur in non-wetlands (estimated probability greater than 99%); NI and UNK = insufficient information to determine status; NL = not listed; NA = no agreement by Regional Panel on status; NO = species does not occur in specified region; * (asterisk) indicates tentative assignment; + (positive) or – (negative) sign indicates higher or lower frequency in its category, respectively. During field investigations, the percentage of hydrophytic plant coverage was determined based on the ratio of wetland indicator species coverage present to the total plant coverage present. More than 50 percent of the dominant plant species cover must be FAC, FACW, or OBL to meet the hydrophytic vegetation criterion.

Hydric soils are defined as soils that are "...*formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part*." (Environmental Laboratory 1987). A minimum of one week of inundation or 14 consecutive days of saturation during the growing season is a typical requirement. The criteria for establishing the presence of hydric soils vary among different soil types and drainage classes. Hydric soil indicators include evidence of reducing or redoximorphic conditions (including sulfidic odor, organic streaking), gleyed, mottled, or low-chroma soils, iron and manganese concretions, and low dissolved oxygen concentration (aquic moisture regime); organic soils (histosols); or mineral soils saturated and rich in organics (histic epipedon) (NRCS 2006a). Richardson and Vepraskas (2001) present a thorough discussion of wetland soil science. In the absence of visible field indicators, hydric soil conditions may be determined according to two criteria: 1) all dominant plant species have an indicator status of OBL and/or FACW (at least one dominant plant species must be OBL); and 2) areas below the level of ordinary high water are frequently flooded for long duration or very long duration during the growing season and possess and aquic (reducing) moisture regime. Soils are also classified as hydric on non-hydric by NRCS (2006b).

Wetland hydrology "...*encompasses all hydrologic characteristics of areas that are periodically inundated or have soils saturated to the surface at some time during the growing season*" (Environmental Laboratory 1987). Many factors influence site-specific hydrology, including the precipitation, stratigraphy, topography, soil permeability, and plant cover of the site. In general, inundation or saturation must occur for at least 5 percent of the growing season to qualify as wetland hydrology. The degree of inundation or saturation at the subject site can vary widely from year to year depending on rainfall patterns within the watershed. Primary wetland hydrology indicators include visual observations of inundation or soil saturation, water marks and water-stained leaves, sediment deposits, drift lines, and drainage patterns in wetlands.

Sampling locations were established within potential wetland areas and within adjacent uplands, where present, to determine the boundary of wetlands. At each sampling point, the location was georeferenced using a GPS receiver and marked on an aerial photograph; a numbered pin flag or lathe was placed, where necessary, to assist other surveyors. Information on vegetation, soils, and hydrology was recorded on a USACE *Routine Wetland Determination Data Form*.

Dominant and subdominant plant species in each vegetative stratum (e.g., tree, shrub, forb) that occurred within approximately 5 to 10 feet of the sampling point were identified and recorded, and their wetland indicator status determined. All visible flora observed were recorded in a field notebook and identified to the lowest possible taxon; a hand lens was used where necessary. When a specimen could not be identified *in situ*, a photograph or voucher specimen (depending upon scientific permit requirements) was taken and identified later in the laboratory using a dissecting scope where necessary. Taxonomic determinations and nomenclature followed these references: plants—Pavlik (1991), Brenzel (2007), Stuart and Sawyer (2001), Lanner (2002), Baldwin et al. (2012), Calflora (2019), University of California at Berkeley (2019a,b).

Where necessary, a soil pit was dug with a spade to expose at least 16 inches of soil profile, and the sample evaluated for hydric soil indicators. Munsell Soil Color Charts (2000 edition, Gretagmacbeth, Inc.) were used to determine soil matrix and mottle color (hue, value, and chroma), and soil type and particle size was also noted. NRCS (1999) Soil Taxonomy handbook was referenced for soil classification where necessary. Based on the results of the 3-parameter test, the extent of each potential wetland was mapped in the field using a GPS receiver capable of submeter accuracy and/or demarcated on aerial photographs for later "heads-up" digitization. Wetlands and other aquatic habitats were classified using the USFWS "*Classification System for Wetland and Deepwater Habitats*", or "Cowardin class" (Cowardin *et al*., 1979; USFWS 2014). A determination was made whether normal environmental conditions exist; atypical conditions followed a modified procedure described in the USACE Manual (Environmental Laboratory 1987). Geographic analyses, including acreage calculations, were performed using geographical information system software (ArcGIS 10, ESRI, Inc.).

For identification of water features other than wetlands that are subject to federal or State jurisdiction, 2 principal field characteristics were evaluated: 1) the presence of a channel; and 2) the presence of an ordinary high water mark. The ordinary high water mark is defined in 33 CFR Part 329.11 as the line on the shore established by the fluctuations of water, and indicated by a clear, natural line impressed on the bank, shelving, changes in soil character, destruction of terrestrial vegetation, or the presence of litter and debris. Other characteristics were noted, where possible: description of hydrologic feature type, length, approximate discharge volume, gradient, range between low and high water mark, width of riparian vegetation, etc. For determination of whether these water bodies constituted waters of the US, USACE regulations (33 CRF 328) were consulted. Data sheets for these non-wetland water bodies were completed at representative locations and were included in the Appendix.

A joint USEPA/USACE memorandum dated 2008 provided guidance to implementing the Supreme Court's decision in the consolidated cases Rapanos v. United States and Carabell v. United States (hereafter referred to simply as "Rapanos") which addressed the jurisdiction over waters of the United States under the Clean Water Act. In Rapanos, the Supreme Court restricted where the federal government can apply the Clean Water Act, specifically by determining whether a wetland or tributary is a "water of the United States." According to USEPA & USACE (2008), jurisdiction will continue to be asserted over "all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide." These waters are referred to as traditional navigable waters. The agencies will also continue to assert jurisdiction over wetlands adjacent to traditional navigable waters, where "adjacent" means "bordering, contiguous, or neighboring." Finding a continuous surface connection is not required to establish adjacency under this definition (USEPA & USACE 2008).

A non-navigable tributary of a traditional navigable water is a non-navigable water body whose waters flow into a traditional navigable water either directly or indirectly by means of other tributaries. Clean Water Act jurisdiction will continue to be held over non-navigable tributaries that are "relatively permanent" – waters that typically (e.g., except due to drought) flow year-round or waters that have a continuous flow at least seasonally (e.g., typically three months). Justice Scalia emphasizes that relatively permanent waters do not include tributaries "*whose flow is 'coming and going at intervals...broken, fitful*.'" Therefore, "relatively permanent" waters do not include ephemeral tributaries which flow only in response to precipitation and intermittent streams which do not typically flow year-round or have continuous flow at least seasonally (USEPA & USACE 2008). However, CWA jurisdiction over these waters will be evaluated under the significant nexus standard described next.

The agencies will assert jurisdiction over the following types of waters when they have a significant nexus with a traditional navigable water: (1) non-navigable tributaries that are not relatively permanent, (2) wetlands adjacent to non-navigable tributaries that are not relatively permanent, and (3) wetlands adjacent to, but not directly abutting, a relatively permanent tributary (e.g., separated from it by uplands, a berm, dike or similar feature). The agencies will assess the flow characteristics and functions of the tributary itself, together with the functions performed by any wetlands adjacent to that tributary, to determine whether collectively they have a significant nexus with traditional navigable waters. A waterbody possesses the requisite nexus, and thus becomes jurisdictional, if the waterbody, either alone or in combination with similarly situated lands in the region, significantly affects the chemical, physical, and biological integrity of other covered waters more readily understood as 'navigable' (USEPA & USACE 2008).

To assist in the interpretation of the Rapanos criteria, the USACE Jurisdictional Determination Form Instructional Guidebook was consulted (USACE & USEPA 2007).

3. RESULTS

3.1. FIELD SURVEY AND CONDITIONS

Dr. G. O. Graening conducted a reconnaissance-level assessment on January 25, 2025. Kristen Ahrens, M.S. performed the formal delineation on March 23, 2025. A complete coverage, variable-intensity pedestrian survey was performed of the Study Area, modified to account for differences in terrain, vegetation density, and visibility. Sampling points were established at key locations and analyzed for the presence or absence of wetland (or for channels, ordinary high water mark) indicators; these points are documented in the Data Sheets in the Appendix. The results of the analyses of Study Area vegetation, soils, and hydrology are presented in the following sections, followed by the recommended jurisdictional determination.

3.2. Vegetation

The Study Area contains two vegetation community types: coastal coniferous forest and ruderal/developed. The Study Area land use is rural residential and has been developed with structures, graveled/mulched/paved driveways, and landscaping; these portions of the Study Area were converted from natural habitat many years ago (see Exhibits). Plant species present consist primarily of non-native annual grasses and weedy forbs, but also landscape plants/ornamentals. The non-developed portion of the Study Area is coastal coniferous forest, with the canopy consisting of Douglas fir (Pseudotsuga menziesii), Monterey cypress (Hesperocyparis macrocarpa), ash (Fraxinus), and pine (Pinus muricata, etc.), and an understory of dogwood (Cornus nuttallii), brambles (Rubus, Ribes), and various fern species. Obligate wetland plants are present within the Study Area.

3.3. Soil Types

Digital soil survey maps from NRCS' SSURGO 2.2 Database were consulted for this study (NRCS 2017), and 1 mapped soil unit occurs within the Study Area (see Exhibits): 199: Shinglemill-Gibney complex, 2 to 9 percent slopes. Some mapped soil types within the Study Area were found to be designated "hydric" by NRCS: Shinglemill is hydric; Gibney is not hydric. NRCS provides this disclaimer: "*Lists of hydric soils along with soil survey maps are good off-site ancillary tools to assist in wetland determinations, but they are not a substitute for observations made during on-site investigations*." (http://soils.usda.gov/use/hydric/overview.html).

3.4. Hydrology

The general direction of surface runoff in the Study Area is to the west (see Exhibits). According to the FEMA Flood Hazard Boundary Map of the region, the property is not located within a flood zone (see Exhibits). The zone codes are as follows: Zone A – inside the 100-year floodplain; Zone X - outside the 500-year floodplain; Zone X500 - outside the 100-year floodplain but within the 500-year floodplain; Zone ANI – area not included in the mapping program. Because wetlands often occur within floodplains, these FEMA Flood Hazard Boundary Maps may assist the delineator in determining if wetland hydrology exists within the Study Area.

The USFWS National Wetland Inventory (NWI) digital maps of the Study Area were also consulted (see Exhibits). One NWI wetland feature was mapped within the Study Area: the ornamental pond. Note, however, that this database was not used to conclude that a wetland was present or absent in the Study Area.

3.5. DELINEATION RESULTS AND JURISDICTIONAL RECOMMENDATIONS

All hydrologic features were identified and mapped within the Study Area and subjected to the delineation criteria set forth by each regulatory agency. These features are summarized in the following tables and mapped in the Exhibits. This map has not been verified by USACE, and thus represents an unofficial

demarcation of the potential limits of jurisdiction. Various survey points were established for the delineation of this Study Area.

3.5.1. Water Resources Potentially Subject to Federal Jurisdiction

All identified hydrologic features were subjected to the 3-parameter test, the Hydrology Criterion (Scalia Test), and the Significant Nexus (Kennedy) Test. Based upon these criteria, 2 features within the Study Area were determined to be potentially subject to USACE jurisdiction(see Exhibits):

Channel section, north
Unnamed channel, ephemeral, Cowardin Class R4SB; coordinates 39.3176, -123.7914; 536 square feet (0.012 acre),134 linear feet, 4 feet wide. Ordinary High Water Mark indicators for this drainage are: shelving; destruction/absence of vegetation; bank erosion; and litter/debris packing.

Marsh
Freshwater emergent wetland, Cowardin Class PEM1; coordinates 39.3167, -123.7905; 2082 square feet (0.048 acre). Dominant plants were *Equisetum, Ranunculus,* and *Deschampsia*. Soils exhibited organic and clay accumulations with reduced conditions and gleying.

There is also a jurisdictional channel next to the southern boundary of the Property, but this is understood to be outside of the Property (and Study Area)(see Exhibits).

3.5.2. Upland Features Not Expected To Be Subject to Federal Regulation

There is an ornamental pond (3,947 square feet; 0.091 acres) that appears to have been constructed in uplands in front of the house; it is fed by a swale that has also been landscaped into a rock garden. When the pond is at full capacity, it spills over in to a swale that runs to the southwest and under the driveway via a pipe culvert. The pond is not hydrologically connected to the channel on the southern boundary.

There are various upland swales within the Study Area. These features have upland pasture grasses such as *Lolium perenne* and do not have defined channels or OHWM indicators (see Exhibits). They all fail the Scalia Test for relatively permanent flow and they fail the connectivity criterion. They all fall under the category described by USEPA & USACE (2008) as:

> "*Swales or erosional features (e.g., gullies, small washes characterized by low volume, infrequent, or short duration flow) are generally not waters of the United States because they are not tributaries or they do not have a significant nexus to downstream traditional navigable waters. In addition, ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water are generally not waters of the United States because they are not tributaries or they do not have a significant nexus to downstream traditional navigable waters*."

4. QUALIFICATIONS OF DELINEATORS & REPORT AUTHORS

G.O. GRAENING, Ph.D., M.S.E.
Dr. Graening holds a PhD in Biological Sciences and a Master of Science in Biological and Agricultural Engineering. Dr. Graening was an adjunct Professor at California State University at Sacramento for 10 years and was an active researcher in the area of conservation biology; his publication list is available online at http://www.csus.edu/indiv/g/graeningg/pubs.htm. Dr. Graening is also a Certified Arborist (ISA # WE-6725A). Dr. Graening has over 30 years of experience in environmental assessment, including previous employment with The Nature Conservancy.

KRISTEN AHRENS, M.S.
Kristen Ahrens holds a B.S. and M.S. in Biological Sciences. Ms. Ahrens has experience performing delineations and sensitive plant and animal surveys with expertise in mammalian studies and is currently a part-time instructor at California State University at Sacramento in the Department of Biological Sciences. Ms. Ahrens has over 15 years of experience in environmental assessment, research, and biology teaching with employers that include Brusca Associates, Inc., California Department of Fish and Wildlife, and U.S. Fish and Wildlife.

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6. QUALIFICATIONS OF SURVEYORS AND REPORT PREPARERS

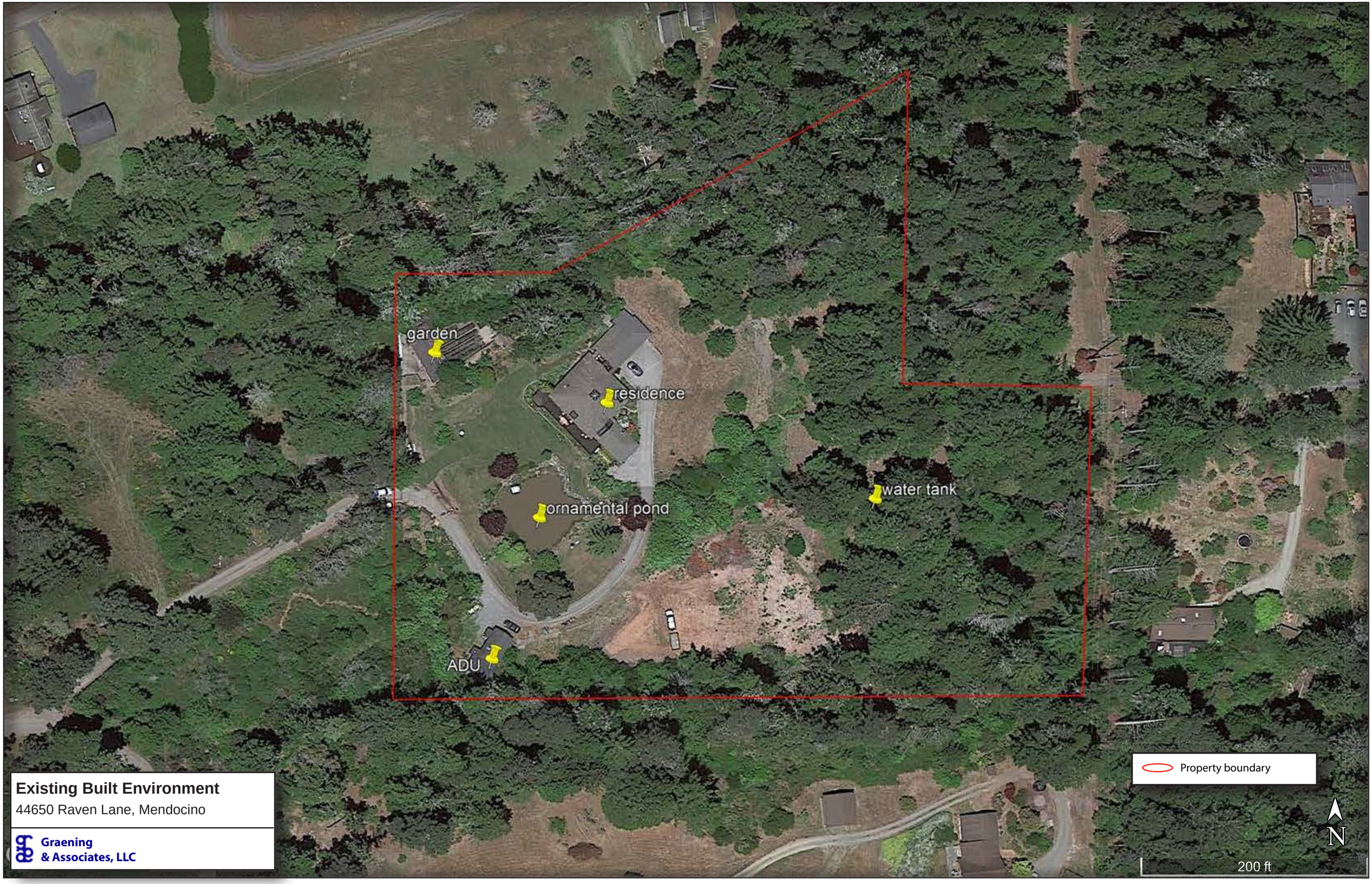
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G. O. Graening holds a Ph.D. in Biological Sciences and a Master of Science in Biological Engineering, and is a certified professional in storm water quality (EnviroCert Int'l). Dr. Graening has 30 years of experience in environmental assessment and research, including the performance of numerous wetland delineations and aquatic restoration projects. Dr. Graening also serves as an adjunct professor of biology at California State University Sacramento and is an active researcher in the area of conservation biology and groundwater ecology.

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Mr. Nosal holds a B.S. and M.S. in Biological Sciences. Mr. Nosal has statewide experience performing sensitive plant and animal surveys in addition to terrestrial vegetation investigations. Mr. Nosal has over 25 years of experience in botanical surveys, environmental assessment, and teaching with employers that include California Department of Fish and Wildlife, State Water Resources Control Board, American River College, MTI College and Pacific Municipal Consultants. Mr. Nosal has intensive experience with the flora of the Pine Hill region includes leading numerous field trips exploring the botany of the region, co-authoring a fuel management plan for Pine Hill, and a Master's thesis on Stebbins's morning glory (*Calystegia stebbinsii*), an endangered plant of this region.

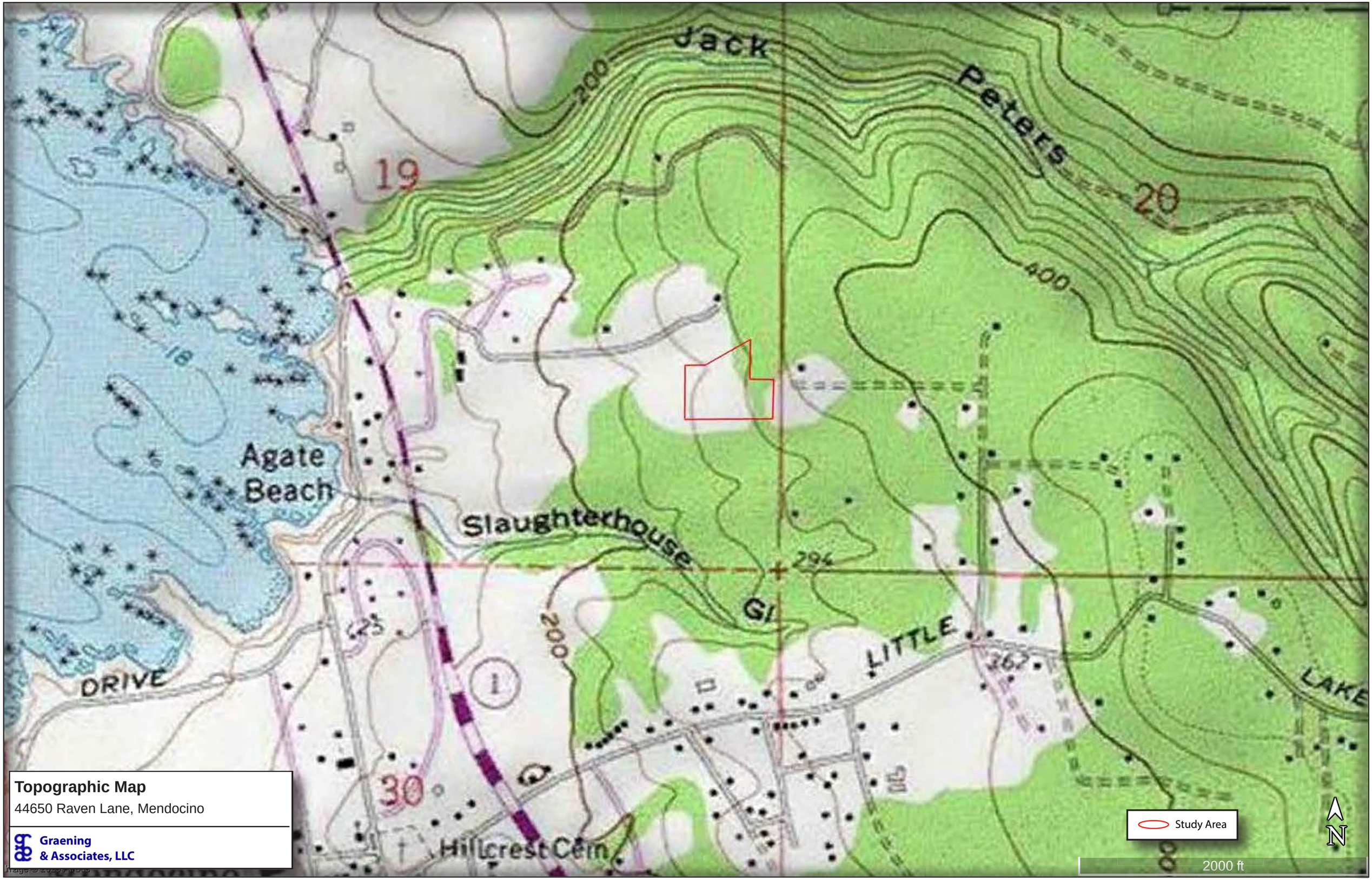
EXHIBITS



Existing Built Environment

44650 Raven Lane, Mendocino

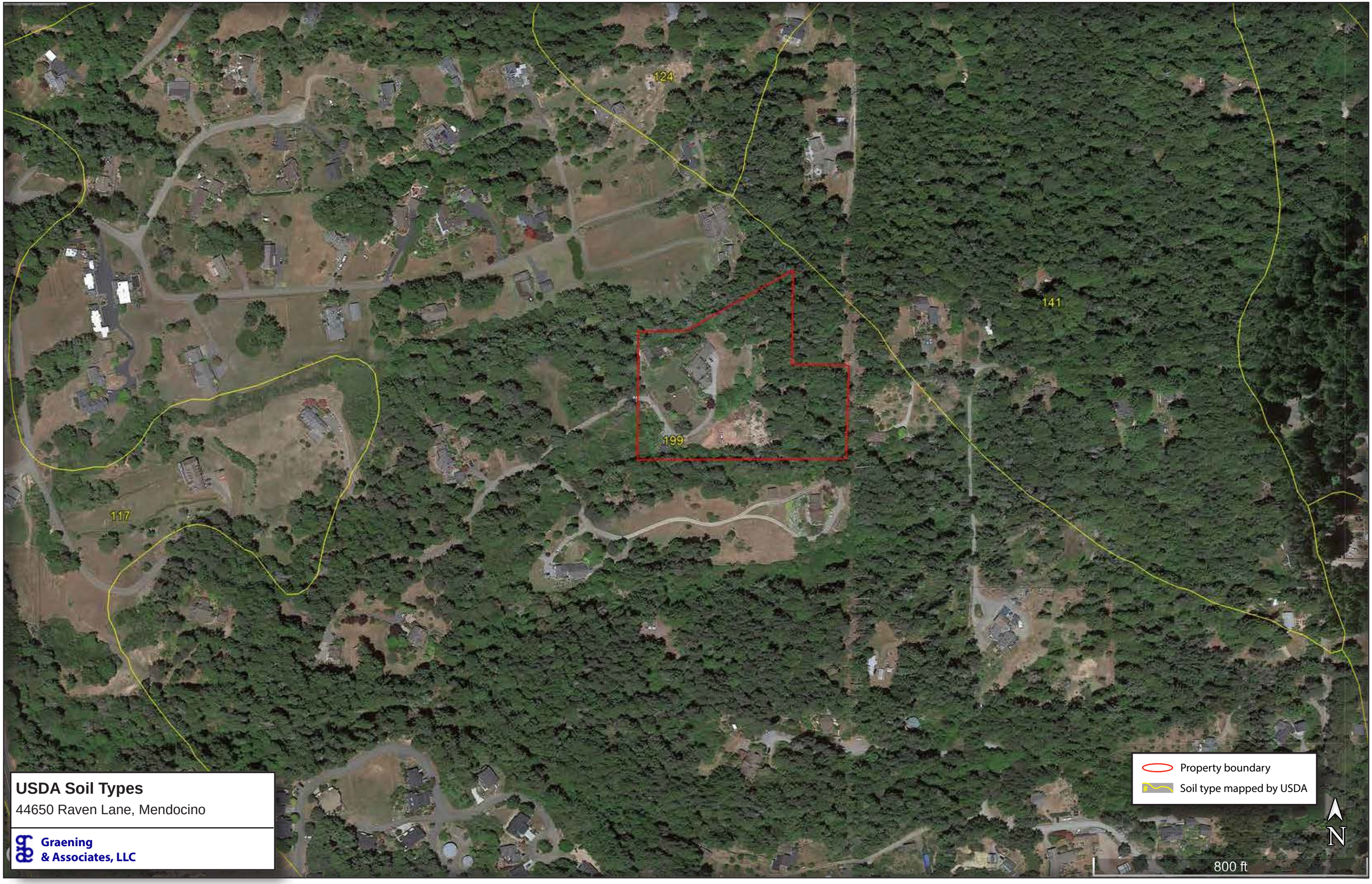
Graening
& Associates, LLC



Topographic Map

44650 Raven Lane, Mendocino

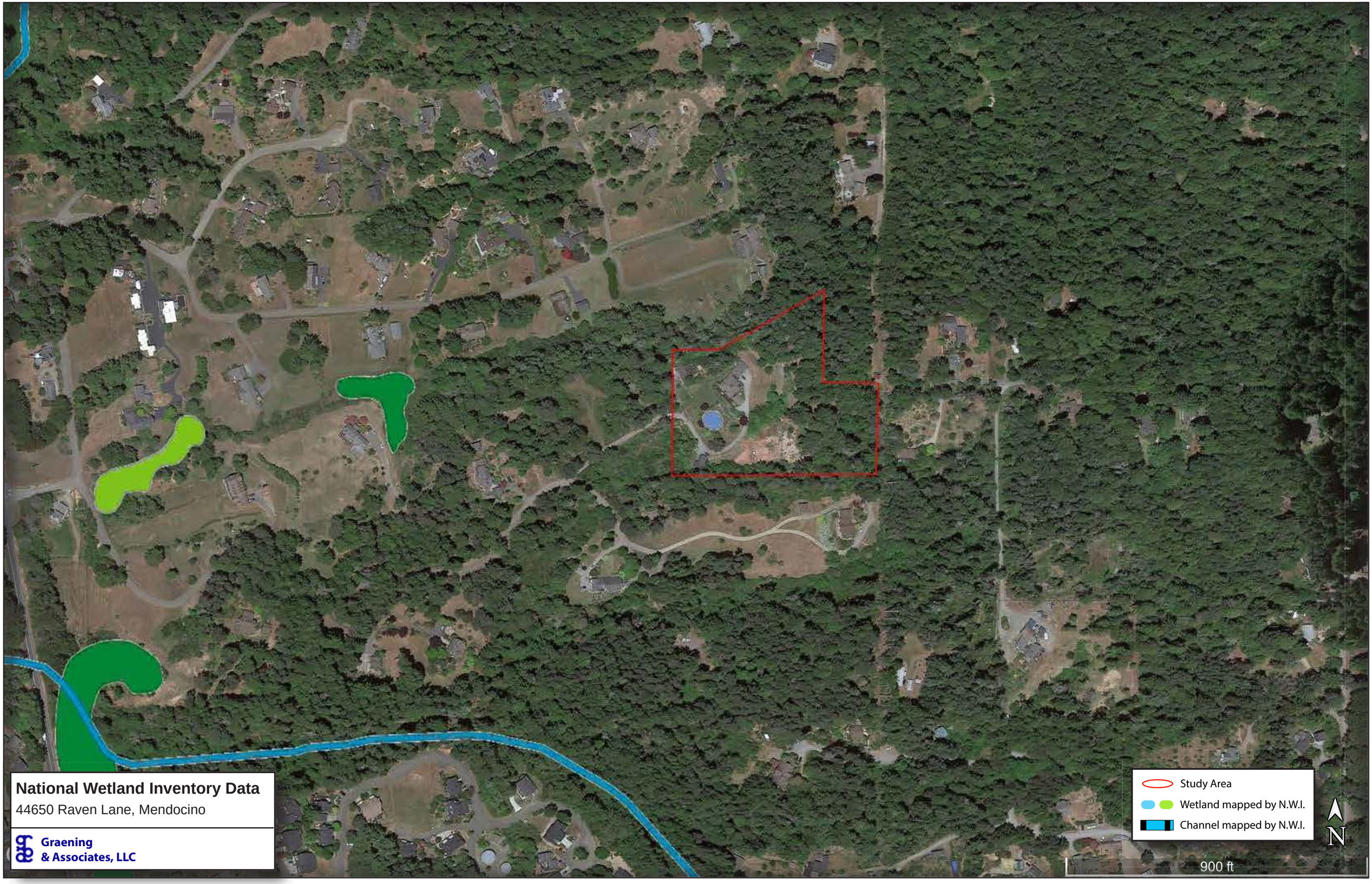
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& Associates, LLC



USDA Soil Types

44650 Raven Lane, Mendocino

Graening & Associates, LLC



National Wetland Inventory Data

44650 Raven Lane, Mendocino

Graening
& Associates, LLC

Aquatic Resources Classification			Aquatic Resource Size		
Aquatic Resource Name	**Cowardin**	**Location (Lat/Long)**	**(sq. ft.)**	**(acre)**	**(linear feet)**
Channels					
channel section, north	R4SB	39.3176, -123.7914	536	0.012	134
		Total Channels	**536**	**0.012**	**134**
Wetlands					
marsh	PEM1	39.3167, -123.7905	2082	0.048	
		Total Wetlands	**2082**	**0.048**	

39.3181, -123.7900

Upland

Wetland

ADU

39.3167, -123.7916

Aquatic Resources Delineation Map

44650 Raven Lane, Mendocino

Delineator: Dr. G.O. Graening, April 7, 2025

Graening & Associates, LLC

Parcel Boundary

Data Points

Jurisdictional Features

Channel

Marsh

Non-Jurisdictional Features

Pond

Upland swales

Pipe culverts

N

200 ft

APPENDIX – WETLAND DELINEATION FIELD DATA SHEETS

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: 44650 Raven Lan City/County: Mendocino Sampling Date: 3/23/25

Applicant/Owner: State: CA Sampling Point: wetland

Investigator(s): Kristen Ahrens Section, Township, Range:

Landform (hillslope, terrace, etc.): Local relief (concave, convex, none): Slope (%):

Subregion (LRR): Lat: Long: Datum:

Soil Map Unit Name: NWI classification: n/a

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ____ (If no, explain in Remarks.)

Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No ____

Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ✓	No ____	**Is the Sampled Area within a Wetland?** Yes ✓ No ____
Hydric Soil Present?	Yes ✓	No ____	
Wetland Hydrology Present?	Yes ✓	No ____	

Remarks: located east of ADU on southern prop. boundary

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: ____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	____ = Total Cover		
Sapling/Shrub Stratum (Plot size: ____)			
1.			
2.			
3.			
4.			
5.			
	____ = Total Cover		
Herb Stratum (Plot size: ____)			
1. Deschampsia sp.	25		FACW
2.			
3. Equisetum sp.	15		FAC
4.			
5. Ranunculus sp.	60	Y	FAC
6.			
7.			
8.			
9.			
10.			
11.			
	90 = Total Cover		
Woody Vine Stratum (Plot size: ____)			
1.			
2.			
	____ = Total Cover		

% Bare Ground in Herb Stratum ____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: ____ (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species ____	x 1 = ____
FACW species ____	x 2 = ____
FAC species ____	x 3 = ____
FACU species ____	x 4 = ____
UPL species ____	x 5 = ____
Column Totals: ____ (A)	____ (B)

Prevalence Index = B/A = ____

Hydrophytic Vegetation Indicators:

- ___ 1 - Rapid Test for Hydrophytic Vegetation
- ___ 2 - Dominance Test is >50%
- ___ 3 - Prevalence Index is ≤3.0[1]
- ___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ___ 5 - Wetland Non-Vascular Plants[1]
- ___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ✓ No ____

Remarks:

SOIL

Sampling Point: wetland

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-16"	2.5YR 2.5/1		5Y 6/4	10	RM		loamy clay	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- X Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- X 2 cm Muck (A10)
- ___ Red Parent Material (TF2)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ✓ No _____

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required: check all that apply)

- ✓ Surface Water (A1)
- ___ High Water Table (A2)
- ✓ Saturation (A3)
- ✓ Water Marks (B1)
- ✓ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ___ Salt Crust (B11)
- ✓ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Stunted or Stressed Plants (D1) **(LRR A)**
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)
- ___ Raised Ant Mounds (D6) **(LRR A)**
- ___ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes ✓ No _____ Depth (inches): 2"

Water Table Present? Yes ✓ No _____ Depth (inches): 0"

Saturation Present? (includes capillary fringe) Yes ✓ No _____ Depth (inches): 0"

Wetland Hydrology Present? Yes ✓ No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:



WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: 44650 Raven Lane City/County: Mendocino Sampling Date: 3/27/25

Applicant/Owner: State: CA Sampling Point: SWALE

Investigator(s): Section, Township, Range:

Landform (hillslope, terrace, etc.): Local relief (concave, convex, none): Slope (%):

Subregion (LRR): Lat: Long: Datum:

Soil Map Unit Name: NWI classification: n/a

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No ____ (If no, explain in Remarks.)

Are Vegetation ____, Soil ____, or Hydrology ____ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No ____

Are Vegetation ____, Soil ____, or Hydrology ____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No ✓	**Is the Sampled Area within a Wetland?** Yes ____ No ✓
Hydric Soil Present?	Yes ____	No ✓	
Wetland Hydrology Present?	Yes ____	No ____	

Remarks:

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: ____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3. ✓			
4.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: ____)			
1.			
2.			
3.			
4. ✓			
5.			
	= Total Cover		
Herb Stratum (Plot size: ____)			
1. Deschampsia	20	N	FACW
2.			
3. Polystichum	10	N	FACU
4.			
5. Ranunculus	5	N	FAC
6.			
7. Lolium perenne	50	Y	FACU
8.			
9.			
10.			
11.			
	= Total Cover		
Woody Vine Stratum (Plot size: ____)			
1.			
2. ✓			
	= Total Cover		

% Bare Ground in Herb Stratum ____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species ____	x 1 = ____
FACW species ____	x 2 = ____
FAC species ____	x 3 = ____
FACU species ____	x 4 = ____
UPL species ____	x 5 = ____
Column Totals: ____ (A)	____ (B)

Prevalence Index = B/A = ____

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

___ 2 - Dominance Test is >50%

___ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ 5 - Wetland Non-Vascular Plants[1]

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No ✓

Remarks:

SOIL

Sampling Point: SWALE

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-12	5YR 4/3		n/a				sandy/loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10)
- ___ Red Parent Material (TF2)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No ✓

Remarks: no soil indicators

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ___ Salt Crust (B11)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Stunted or Stressed Plants (D1) **(LRR A)**
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)
- ___ Raised Ant Mounds (D6) **(LRR A)**
- ___ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes _____ No ✓ Depth (inches): _____

Water Table Present? Yes _____ No ✓ Depth (inches): 11

Saturation Present? (includes capillary fringe) Yes ✓ No _____ Depth (inches): 1

Wetland Hydrology Present? Yes _____ No ✓

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: recent rain wetted soils



WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: 44650 Raven Lane City/County: Mendocino Sampling Date: 3/23/25

Applicant/Owner: _____ State: CA Sampling Point: UPLAND

Investigator(s): _____ Section, Township, Range: _____

Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____

Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____

Soil Map Unit Name: _____ NWI classification: n/a

Are climatic / hydrologic conditions on the site typical for this time of year? Yes _____ No _____ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ✓ No _____

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No ✓	**Is the Sampled Area within a Wetland?**	Yes _____ No ✓
Hydric Soil Present?	Yes _____	No ✓		
Wetland Hydrology Present?	Yes _____	No ✓		

Remarks:

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	= Total Cover		
Sapling/Shrub Stratum (Plot size: _____)			
1.			
2.			
3.			
4.			
5.			
	= Total Cover		
Herb Stratum (Plot size: _____)			
1. Lolium perenne	50	Y	FACU
2.			
3. Geranium	5		FAC
4.			
5. Trifolium	5		FACU
6.			
7. Taraxacum officinale	5		FACU
8.			
9.			
10.			
11.			
	100 = Total Cover		
Woody Vine Stratum (Plot size: _____)			
1.			
2.			
	= Total Cover		

% Bare Ground in Herb Stratum _____

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0 (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species _____	x 1 = _____
FACW species _____	x 2 = _____
FAC species _____	x 3 = _____
FACU species _____	x 4 = _____
UPL species _____	x 5 = _____
Column Totals: _____ (A)	_____ (B)

Prevalence Index = B/A = _____

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

___ 2 - Dominance Test is >50%

___ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ 5 - Wetland Non-Vascular Plants[1]

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes _____ No ✓

Remarks:

SOIL

Sampling Point: UPLAND

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0-16	5YR 4/3		n/a				loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Loamy Mucky Mineral (F1) **(except MLRA 1)**
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10)
- ___ Red Parent Material (TF2)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No ✓

Remarks: no soil indicators

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Surface Soil Cracks (B6)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9) **(except MLRA 1, 2, 4A, and 4B)**
- ___ Salt Crust (B11)
- ___ Aquatic Invertebrates (B13)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres along Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Stunted or Stressed Plants (D1) **(LRR A)**
- ___ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ___ Water-Stained Leaves (B9) **(MLRA 1, 2, 4A, and 4B)**
- ___ Drainage Patterns (B10)
- ___ Dry-Season Water Table (C2)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ FAC-Neutral Test (D5)
- ___ Raised Ant Mounds (D6) **(LRR A)**
- ___ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes ___ No ✓ Depth (inches): _____

Water Table Present? Yes ___ No ✓ Depth (inches): _____

Saturation Present? (includes capillary fringe) Yes ✓ No ___ Depth (inches): 2"

Wetland Hydrology Present? Yes _____ No ✓

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks: recent rain wetted soils



APPENDIX B – PHOTOS FROM FIELD DELINEATION

PHOTOS OF NORTHERN CHANNEL









PHOTOS OF SOUTHERN CHANNEL









PHOTOS OF MARSH





GENERAL SITE PHOTOS

























BIOLOGICAL SCOPING SURVEY AND BOTANCIAL SURVEY FOR THE RESIDENTIAL IMPROVEMENTS AT 44700 RAVEN LANE, MENDOCINO, CALIFORNIA

January 28, 2025

Prepared by:

Graening and Associates, LLC
343 Carpenter Hill Road, Folsom CA 95630

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1. INTRODUCTION

1.1. PROJECT LOCATION AND DESCRIPTION

A biological scoping survey and botanical survey for a coastal development permit was conducted on a parcel (APN 119-040-41) located at 44700 Raven Lane, with access off of Highway 1. The proposed project components are (see Exhibits):

- Construction of a new residence (single story, 2 bedroom)
- Relocation of a cabin from the adjacent property (APN 119-040-37) to the subject property
- Construction of a septic system and leachfield

The Study Area was defined as an arbitrary boundary drawn around all 3 proposed project components; the Study Area is approximately 2 acres (see Exhibits).

1.2. ENVIRONMENTAL SETTING

The Study Area is located within the Outer North Coast Range geographic subregion, which is contained within the Northwestern California geographic subdivision of the larger California Floristic Province (Baldwin et al. 2012). This region has a Mediterranean-type climate, characterized by distinct seasons of hot, dry summers and wet, moderately-cold winters. The Study Area and vicinity is in Climate Zone 17: Marine effects in Southern Oregon and Northern California, defined by mild, wet, almost frostless winters and cool summers with frequent fog or wind (Sunset, 2024). The topography of the Study Area is a coastal terrace. The elevation ranges from approximately 260 to 280 feet above mean sea level. USDS maps one soil type in the Study Area: #199: Shinglemill-Gibney complex, 2 to 9 percent slopes, hydric.

1.3. METHODS

Wildlife Survey / Habitat Mapping

A variable-intensity pedestrian survey was performed, and modified to account for differences in terrain, vegetation density, and visibility. All visible fauna and flora observed were recorded in a field notebook, and identified to the lowest possible taxon. Survey efforts emphasized the search for any special-status species that had documented occurrences in the CNDDB within the vicinity of the Study Area and those species on the USFWS species list (Appendix 1).

The locations of any special-status species sighted were marked on aerial photographs and/or georeferenced with a geographic positioning system (GPS) receiver. Habitat types occurring in the Study Area were mapped on aerial photographs, and information on habitat conditions and the suitability of the habitats to support special-status species was also recorded. The Study Area was also informally assessed for the presence of potentially-jurisdictional water features, including riparian zones, isolated wetlands and vernal pools, and other biologically-sensitive aquatic habitats

Botanical Survey

Dr. Graening performed the botanical field survey on the morning of January 25, 2025. Two person-hours were spent, but the survey area was only several hundred square feet. Survey methodology followed the following protocols:

- California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

The timing of the botanical field survey did not affect the comprehensiveness of the botanical field survey because the region does not freeze and thus plants may bloom at any time and because the project areas are already urbanized and have no significant potential to harbor rare plants, and because the ground cover is dominated by invasive grasses and forbs.

2. RESULTS

2.1. VEGETATION COMMUNITIES AND WILDLIFE

All plant taxa detected during the botanical field survey are listed in the following table. No special-status plants were detected during the botanical survey.

Checklist of Plants Occurring within, or Directly Adjacent to, the Project Area

Scientific Name	Common Name
Abies sp.	fir
Cirsium vulgare	bull thistle
Cotoneaster spp.	cotoneaster
Cytisus scoparius	Scotch broom
Digitalis sp.	foxglove
Erica sp.	heath
Fragaria chiloensis	Beach strawberry
Hedera helix	English ivy
Hesperocyparis macrocarpa	Monterey cypress
Hordeum sp.	Barley
Iris douglasiana	Douglas Iris
Juncus effusus	Common rush
Leontodon taraxacoides	hawkbit
Notholithocarpus densiflorus	tanoak
Oxalis pes-caprae	sour grass
Picea sitchensis	Sitka spruce
Pinus radiata	Monterey pine
Polystichum californicum	California swordfern
Ramalina menziesii	lace lichen
Rhododendron sp.	Rhododendron
Rubus discolor	Himalayan blackberry
Rubus spectabilis	salmonberry
Rubus ursinus	California blackberry
Sequoia sempervirens	Coast redwood
Taraxacum officinale	Dandelion

The Study Area contains two vegetation community types: coastal coniferous forest and ruderal/developed. The Study Area consist of several residential lots that have been developed with structures, graveled/mulched/paved driveways, and landscaping; these portions of the Study Area were converted from natural habitat many years ago (see Exhibits). Plant species present consist primarily of non-native annual grasses and weedy forbs, but also English ivy (*Hedera helix*) and rhododendron (*Rhododendron*). The non-developed portion of the Study Area is coastal coniferous forest, with the canopy consisting of Douglas fir (*Pseudotsuga menziesii*), Monterey cypress (*Hesperocyparis macrocarpa*), ash (*Fraxinus*), and pine (*Pinus muricata*, etc.), and an understory of dogwood (*Cornus nuttallii*), brambles (*Rubus, Ribes*), and various fern species.

The Study Area is devoid of wildlife in areas that are cleared, landscaped, or developed (including the Study Area) except for songbirds tolerant of human activity. The portions of the Study Area that contain

coastal coniferous forest host a variety of bird species, including woodpeckers, raven (*Corvus corax*), and seagull flyovers (Laridae).

2.2. Critical Habitat, Special-status Habitat, Habitat Plans and Wildlife Corridors

The Study Area is not located within the boundaries of any critical habitat. The CNDDB reported no special-status habitats within the Study Area. The CNDDB reported the following special-status habitats in a 10-mile radius outside of the Study Area: coastal and valley freshwater marsh; coastal brackish marsh; sphagnum bog; grand fir forest; Mendocino pygmy cypress forest; and northern coastal salt marsh. No special-status habitats were detected within the Study Area.

Wildlife movement corridors link remaining areas of functional wildlife habitat that are separated primarily by human disturbance, but natural barriers such as rugged terrain and abrupt changes in vegetation cover are also possible. Wilderness and open lands have been fragmented by urbanization, which can disrupt migratory species and separate interbreeding populations. Corridors allow migratory movements and act as links between these separated populations.

No wildlife corridors exist within the Study Area, but the coniferous forest provides for animal movement while the adjacent Highway 1 acts as a barrier and a mortality sink. No fishery resources exist in the Study Area, but the adjacent Pacific Ocean and streams (gulches) contain important fishery resources. The Study Area is not located within any adopted Habitat Conservation Plan or Natural Community Conservation Plan.

2.3. LISTED SPECIES AND OTHER SPECIAL-STATUS SPECIES

For the purposes of this assessment, “special status” is defined to be species that are of management concern to state or federal natural resource agencies, and include those species that are:

- Listed as endangered, threatened, proposed, or candidate for listing under the Federal Endangered Species Act;
- Listed as endangered, threatened, rare, or proposed for listing, under the California Endangered Species Act of 1970;
- Designated as endangered or rare, pursuant to California Fish and Game Code (§1901);
- Designated as fully protected, pursuant to California Fish and Game Code (§3511, §4700, or §5050);
- Designated as a species of special concern by CDFW;
- Plants considered to be rare, threatened or endangered in California by the California Native Plant Society (CNPS); this consists of species on Lists 1A, 1B, and 2 of the CNPS Ranking System; or
- Plants listed as rare under the California Native Plant Protection Act.

2.3.1. Reported Occurrences of Listed Species and Other Special-status Species

No listed species or special-status species have been detected in the Study Area. A list of special-status plant and animal species that have occurred in the vicinity of the Study Area and vicinity was compiled based upon the following:

- Any previous and readily-available biological resource studies pertaining to the Study Area;
- Informal consultation with USFWS by generating an electronic Species List (Information for Planning and Conservation website at https://ecos.fws.gov/ipac/); and
- A spatial query of the CNDDB using the standard 9 quadrangle boundary
- A query of the California Native Plant Society’s database *Inventory of Rare and Endangered Plants of California* (online edition).

The CNDDB was queried and any reported occurrences of special-status species were plotted in relation to the Study Area boundary using GIS software (see exhibits). The CNDDB reported no special-status

species occurrences specifically within the Study Area. There are 3 reported species occurrences that overlaps the Study Area:

- Behren's silverspot butterfly (*Speyeria zerene behrensii*). CNDDB states the accuracy is 1 mile and the populations status is "Possibly Extirpated". The location is based upon museum collections and is vaguely recorded as "*town of Mendocino…occurrence primarily based on collections from Mendocino, Mendocino Co….also type collections from prior to 1869 with locality given as Mendocino attributed here, but it's unclear if those were from town of Mendocino or only in the county….collections were reported from the town of Mendocino on 9 July 1961 and on unknown dates…surveys in 2004 and 2005 did not find any of these butterflies in this vicinity*."

- marsh pea (*Lathyrus palustris*), CNPS 2B.2. CNDDB states the accuracy is 1 mile and the populations status is "Presumed Extant." The location is based upon museum collections and is vaguely recorded as "*vicinity of (back of) the city of Mendocino…exact location unknown. mapped as best guess by* CNDDB *in the general vicinity just east of Mendocino…only source of information for this site is a 1903 McMurphy collection…needs fieldwork*."

- great burnet (*Sanguisorba officinalis*), CNPS 2B.2. CNDDB states the accuracy is 1 mile and the populations status is "Presumed Extant." The location is based upon museum collections and is vaguely recorded as "*about 2 miles northeast of Mendocino City…exact location unknown... no road northeast from Mendocino; mapped as best guess east of Mendocino in vicinity of Little Lake Road….wet sphagnum bog...1957 Sharsmith collection is the only source for this site…ID needs checking (possibly Sanguisorba minor?)…needs fieldwork*."

The CNDDB has concentrations of records in Jack Peters Gulch and in Slaughterhouse Gulch for such steelhead Northern California DPS winter run and for rare amphibians such as red-legged frog and northern red-legged frog. Within a 10-mile buffer of the Study Area boundary, the CNDDB reported several special-status species occurrences, summarized in the table in the Appendix along with any additional CNPS species.

A USFWS species list was generated online using the USFWS' IPaC Trust Resource Report System (see Appendix 1). This list is generated using a regional and/or watershed approach and does not necessarily indicate that the Study Area provides suitable habitat. The following listed species should be considered in the impact assessment:

- Marbled Murrelet Brachyramphus marmoratus Threatened
- Northern Spotted Owl Strix occidentalis caurina Threatened
- Western Snowy Plover Pacific Coast population DPS Charadrius nivosus nivosus Threatened
- Yellow-billed Cuckoo Western U.S. DPS Coccyzus americanus Threatened
- Green Sea Turtle Chelonia mydas Threatened
- Leatherback Sea Turtle Dermochelys coriacea Endangered
- Tidewater Goby Eucyclogobius newberryi Endangered
- Behren's Silverspot Butterfly Speyeria zerene behrensii Endangered
- Lotis Blue Butterfly Lycaeides argyrognomon lotis Endangered
- Monarch Butterfly Danaus plexippus Candidate
- Burke's Goldfields Lasthenia burkei Endangered
- Contra Costa Goldfields Lasthenia conjugens Endangered
- Showy Indian Clover Trifolium amoenum Endangered

Migratory birds should also be considered in the impact assessment.

2.3.2. Potential for Listed Species or Special-status Species to Occur in the Study Area

There is no suitable habitat for any federally-listed species in the Study Area:

- Marbled Murrelet: there is no marine habitat in the Study Area
- Northern Spotted Owl: there are no old-growth trees or mature, dense forest habitat in the Study Area
- Western Snowy Plover: there is no shore habitat in the Study Area
- Yellow-billed Cuckoo there are no riparian habitats in the Study Area
- Green Sea Turtle: there is no marine habitat in the Study Area
- Leatherback Sea Turtle : there is no marine habitat in the Study Area
- Tidewater Goby: there is no marine habitat in the Study Area
- Behren's Silverspot Butterfly: there are no grasslands or nectar habitats in the Study Area
- Lotis Blue Butterfly: there are no grasslands or nectar habitats in the Study Area
- Monarch Butterfly: there are no grasslands or nectar habitats in the Study Area
- Burke's Goldfields: there are no vernal pools or other wetlands in the Study Area
- Contra Costa Goldfields: there are no vernal pools or other wetlands in the Study Area
- Showy Indian Clover: there are no grasslands or wetlands in the Study Area

See the Appendix for a complete table of Special-status Species and their potential to occur in the Study Area.

The 3 project areas have a very low potential for harboring special-status plant species due to the dominance of landscape species and aggressive non-native grasses and forbs; the surrounding Study Area has a greater potential to harbor special-status plant species, but these areas will not be disturbed. The 3 project areas have a very low potential for harboring special-status animal species because there are only disturbed habitats present, there is noise and traffic from Highway 1, and there are constant human activities. The portions of the Study Area that contain coastal coniferous forest have a moderate potential to sustain special-status animals, primarily bird species.

2.4. POTENTIALLY-JURISDICTIONAL WATER RESOURCES

The USFWS National Wetland Inventory reported no water features within the Study Area (see Exhibits). An assessment for the presence of potentially-jurisdictional water resources within the Study Area determined that the 3 project areas and the surrounding Study Area do not contain any channels or wetlands.

The nearest channels are as follows:

- Slaughterhouse Gulch is about 1,000 feet to the south
- Jack Peters Gulch is about 1,500 to the north
- Project is about 100 to110 feet away from drainage ditch on northern property boundary
- The ADU (cabin) is about 50 feet away from the ephemeral channel to the south.

The nearest marine habitat is the beach of the Pacific Ocean about 2,500 feet to the west, with Highway 1 as a wildlife barrier. The nearest wetland is in the ornamental pond about 115 feet away from proposed leachfields and about 65 feet away from existing ADU; riverine wetlands occur in the ephemeral channel to the south..

3. IMPACT ANALYSES AND MITIGATION MEASURES

This section establishes the impact criteria, then analyzes potential Project-related impacts upon the known biological resources within the Study Area, and then suggests mitigation measures to reduce these impacts to a less-than-significant level.

3.1. IMPACT SIGNIFICANCE CRITERIA

The significance of impacts to biological resources depends upon the proximity and quality of vegetation communities and wildlife habitats, the presence or absence of special-status species, and the effectiveness of measures implemented to protect these resources from Project-related impacts. As defined by CEQA, the Project would be considered to have a significant adverse impact on biological resources if it would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a special-status species in local or regional plans, policies, or regulations, or by USFWS or CDFW
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by USFWS or CDFW
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
- Conflict with any county or municipal policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved governmental habitat conservation plan.

3.2. IMPACT ANALYSIS

The following discussion evaluates the potential for Project-related activities to adversely affect biological resources. The Project boundaries were digitized and then overlaid on the habitat map using GIS to quantify potential impacts. Historical aerial photos were also analyzed for changes in land use.

3.2.1. Potential Direct / Indirect Adverse Effects Upon Special-status Species

- *Will the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Plants

No special-status plant species were detected in the Project Area during the botanical field survey. The 3 project areas are located in ruderal/developed habitat, which will be impacted by project implementation. For development of the leachfields, a few hundred square feet of the understory of coastal forest will need to be cleared. No mature trees need to be cleared for project implementation. The 3 project areas have a very low potential for harboring special-status plant species due to the dominance of landscape species and aggressive non-native grasses and forbs. Special-status species are more likely to occur in sensitive and rare habitats, which are lacking in the Project Area. No further botanical field surveys are recommended.

Wildlife

The 3 project areas have a very low potential for harboring special-status animal species because there are only disturbed habitats present, there is noise and traffic from Highway 1, and there are constant human activities. No direct impacts to special-status species are expected from implementation of the proposed project.

However, special-status animals could use the coastal coniferous forest (e.g., Sonoma tree vole) and the drainages (e.g., northwestern pond turtle, northern red-legged frog) near the project areas. Special-status animals could migrate into the 3 project areas before start of construction. Construction activities could cause injury or mortality to special-status species. This is a potentially significant impact before mitigation.

Nesting Birds

Special-status bird species were reported in databases (CNDDB and USFWS) in the vicinity of the Project Area. The Project Area, and adjacent trees and utility poles, contain suitable nesting habitat for various bird species. However, no nests were observed during the field survey. If construction activities are conducted during the nesting season, nesting birds could be directly impacted by tree removal and indirectly impacted by noise, vibration, and other construction-related disturbance. Therefore, Project construction is considered a potentially significant adverse impact to nesting birds.

Recommended Mitigation Measures

Because special-status animals that occur in the vicinity could migrate onto the Study Area between the time that the field survey was completed and the start of construction, a pre-construction survey for special-status species should be performed by a qualified biologist to ensure that special-status species are not present. The survey should focus on Sonoma tree vole, northwestern pond turtle, and northern red-legged frog. If any special-status animals are detected, construction should be delayed, and the appropriate wildlife agency (CDFW and/or USFWS) should be consulted and project impacts and mitigation reassessed. With the implementation of this mitigation measure, adverse impacts upon special-status animals would be reduced to a less-than-significant level.

If construction activities would occur during the nesting season (typically February through August), a pre-construction survey for the presence of special-status bird species or any nesting bird species should be conducted by a qualified biologist within 500 feet of proposed construction areas. If active nests are identified in these areas, CDFW and/or USFWS should be consulted to develop measures to avoid “take” of active nests prior to the initiation of any construction activities. Avoidance measures may include establishment of a buffer zone using construction fencing or the postponement of vegetation removal until after the nesting season, or until after a qualified biologist has determined the young have fledged and are independent of the nest site. With the implementation of this mitigation measure, adverse impacts upon special-status bird species and nesting birds would be reduced to a less-than-significant level.

3.2.2. Potential Direct / Indirect Adverse Effects Upon Special-status Habitats or Natural Communities or Corridors

- *Will the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The Study Area is not located within the boundaries of any critical habitat. There will be no effect on Critical Habitat. The Study Area does not contain riparian habitat or any other special-status habitats. Project implementation will not impact any special-status habitats. Habitat conversion of coastal

coniferous forest is limited to the clearing of a few hundred square feet (and no tree felling); this is not considered to be a significant habitat loss.

Recommended Mitigation Measures

No mitigation is necessary.

3.2.3. Potential Direct / Indirect Adverse Effects on Jurisdictional Water Resources

- *Will the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Potential direct impacts to water resources could occur during construction by modification or destruction of stream banks or riparian vegetation or the filling of wetlands or channels. However, there are no water resources within the Study Area. The nearest channels and wetlands are sufficiently far away and vegetated buffers exist in between. There will be no direct impacts to water resources.

Potential indirect impacts to water resources could occur during construction of projects greater than 1 acre. For such larger projects, surface water quality has the potential to be degraded from storm water transport of sediment from disturbed soils or by accidental release of hazardous materials or petroleum products from sources such as heavy equipment servicing or refueling and enrollment in the Water Board's Construction General Permit is required. However, the proposed project is very small (just several thousand square feet) and of short duration. No hazardous materials or petroleum products or heavy equipment will be used.

Recommended Mitigation Measures

No mitigation is necessary.

3.2.4. Potential Impacts to Wildlife Movement, Corridors, etc.

- *Will the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

No wildlife corridors or fisheries exist within the Study Area, although such resources exist nearby. Implementation of the proposed project would create new barriers to wildlife movement and there is no potential to impact fisheries. Implementation of the project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Recommended Mitigation Measures

No mitigation is necessary.

3.2.5. Potential Conflicts with Ordinances, Habitat Conservation Plans, etc.

- *Will the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- *Will the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Implementation of the proposed project will not require the removal of any mature trees. The Study Area is not within the coverage area of any adopted Habitat Conservation Plan or Natural Community Conservation Plan.

Recommended Mitigation Measures

No mitigation is necessary.

4. QUALIFICATIONS OF BOTANICAL FIELD SURVEYOR / REPORT AUTHOR

G.O. GRAENING, Ph.D., M.S.E.

Dr. Graening holds a PhD in Biological Sciences and a Master of Science in Biological and Agricultural Engineering. Dr. Graening was an adjunct Professor at California State University at Sacramento and was an active researcher in the area of conservation biology; his publication list is available online at http://www.csus.edu/indiv/g/graeningg/pubs.htm. Dr. Graening is also a Certified Arborist (ISA # WE-6725A). Dr. Graening has over 30 years of experience in environmental assessment, including previous employment with The Nature Conservancy.

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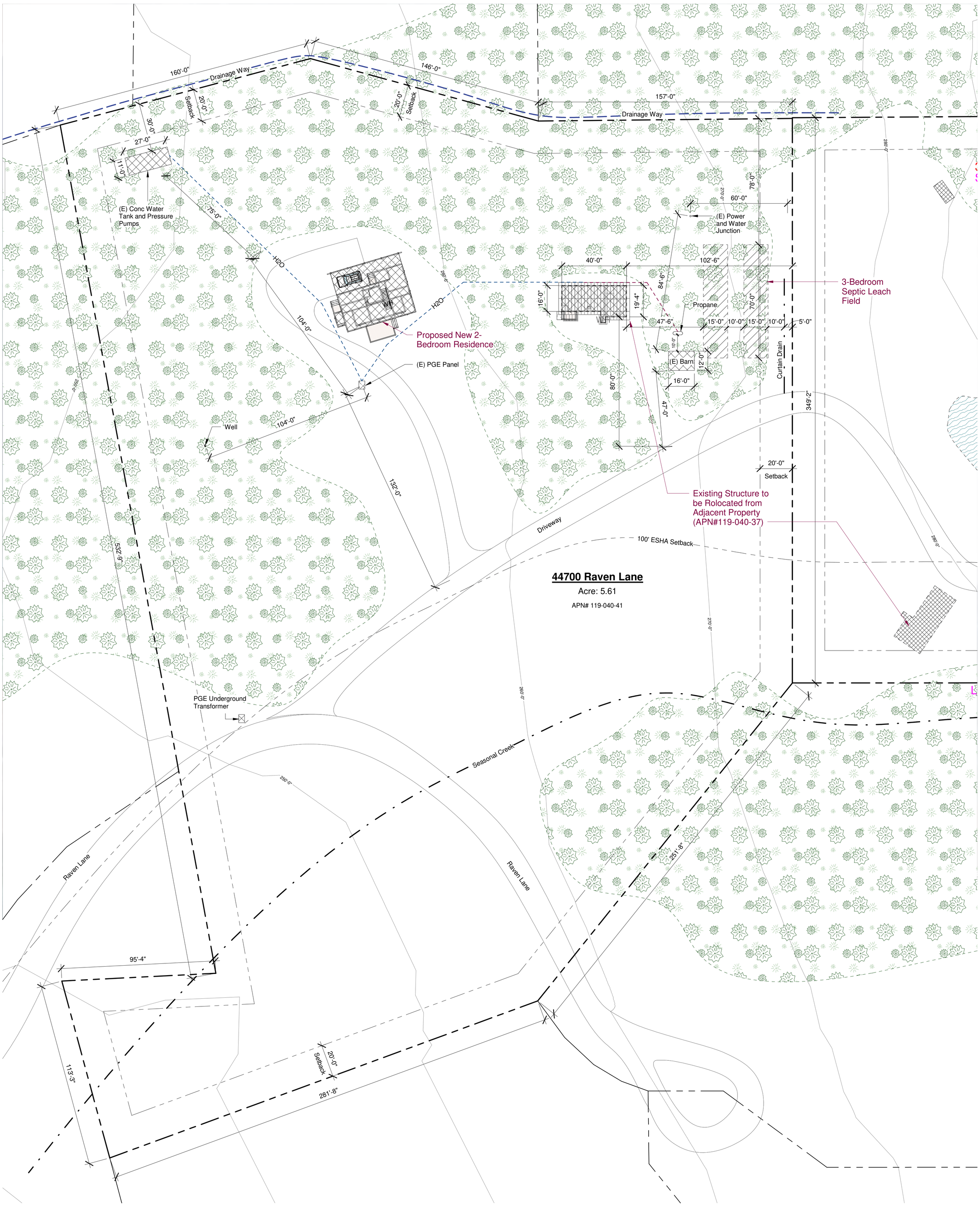
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EXHIBITS



1 Site - 44700 Raven Ln
1" = 30'-0"

Site - 44700 Raven

SCALE : 1" = 30'-0"

A-102

DRAWN BY : SLLC

DATE : TBD

APN # : 119-040-41

David Deaton

Property Development

44650 Raven Lane, Mendocino, CA 95460

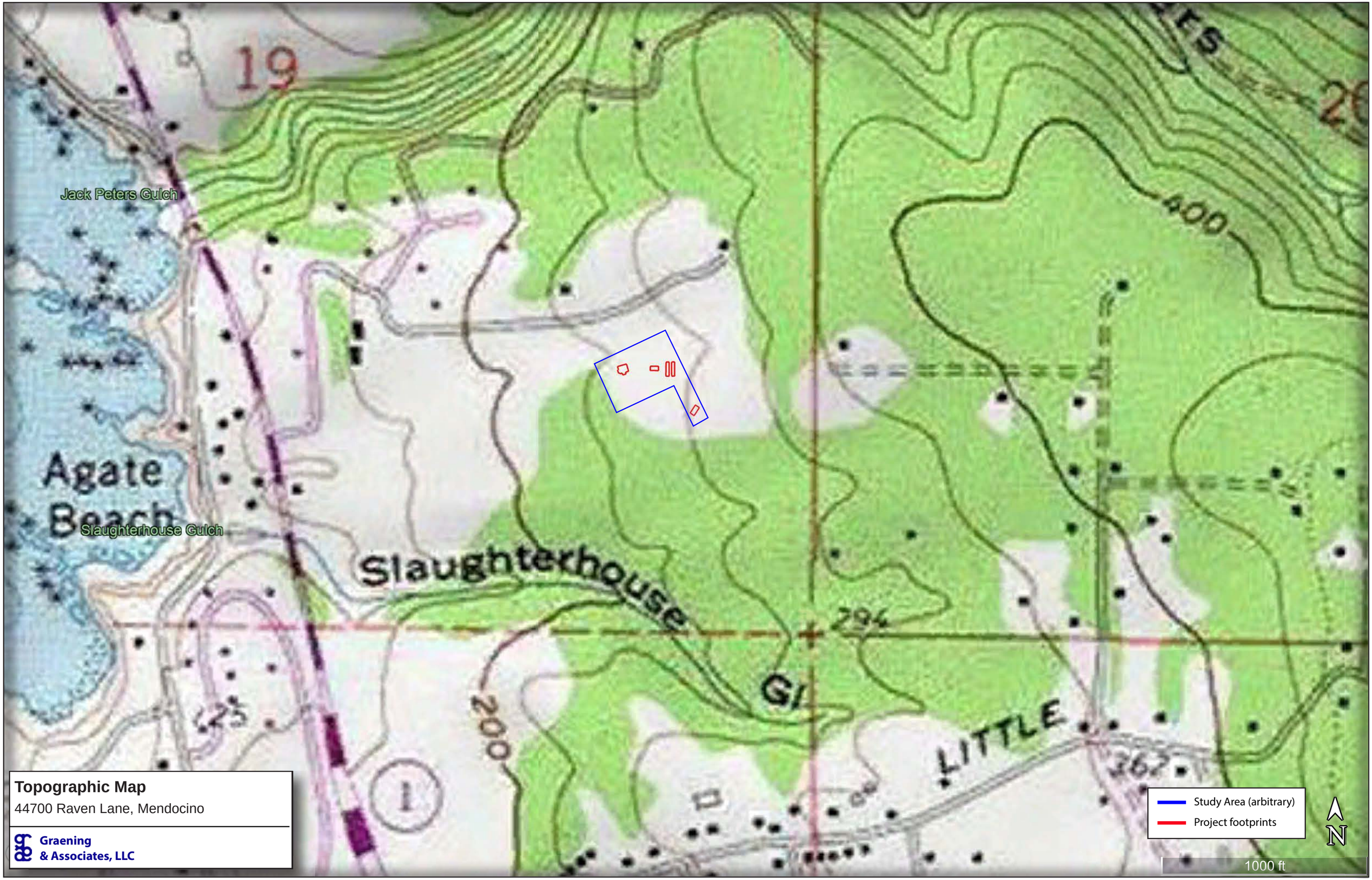
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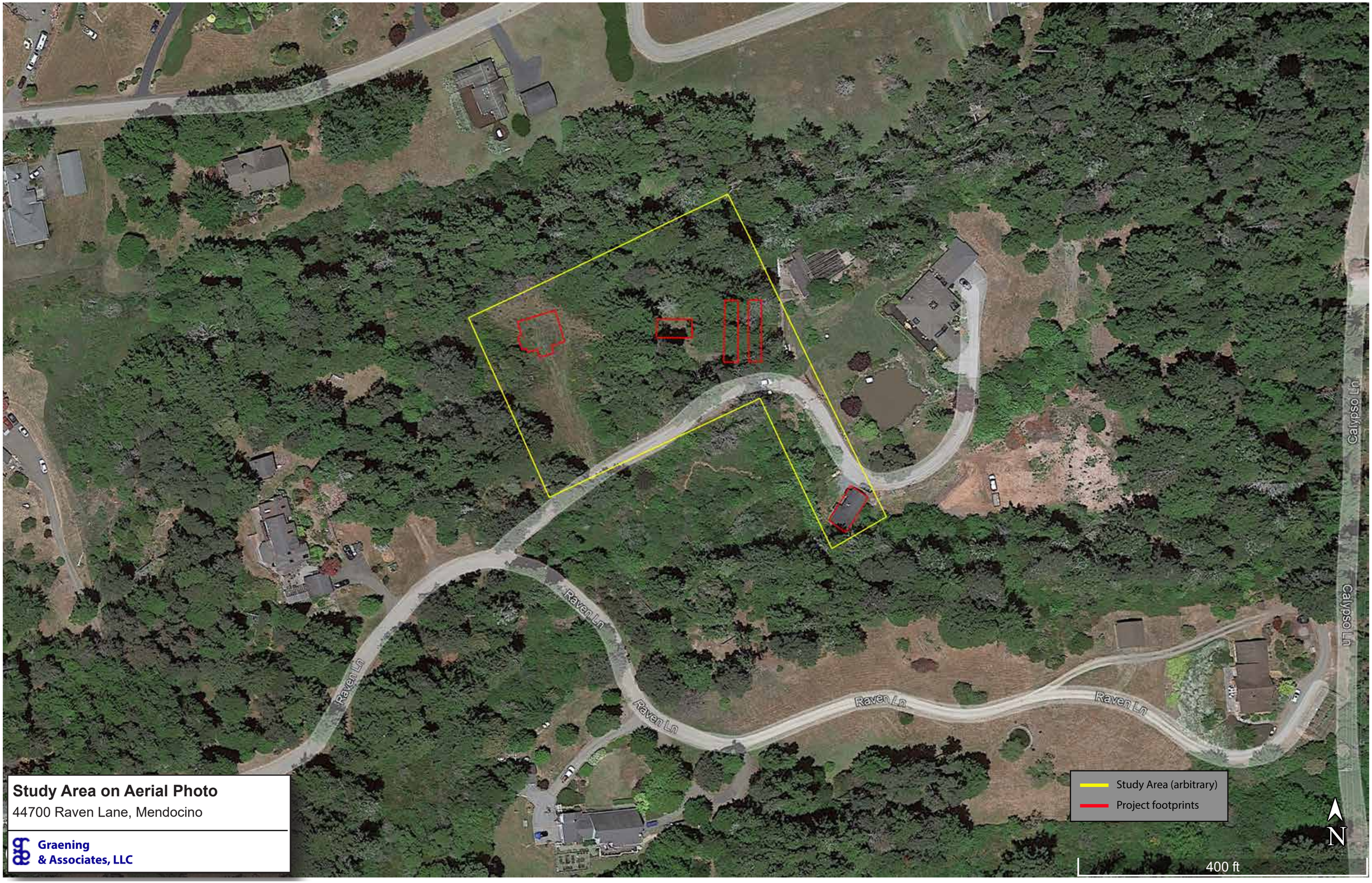
No.	Description	Date

CONTRACTORS:

AUM CONSTRUCTION INC.
General Contractor Lic. # 817115
www.aumconstruction.com

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19
Jack Peters Gulch
Agate Beach
Slaughterhouse Gulch
Slaughterhouse Gl
400
294
200
LITTLE
362
425
1
Topographic Map
44700 Raven Lane, Mendocino
Graening & Associates, LLC
Study Area (arbitrary)
Project footprints
N
1000 ft



Study Area on Aerial Photo

44700 Raven Lane, Mendocino

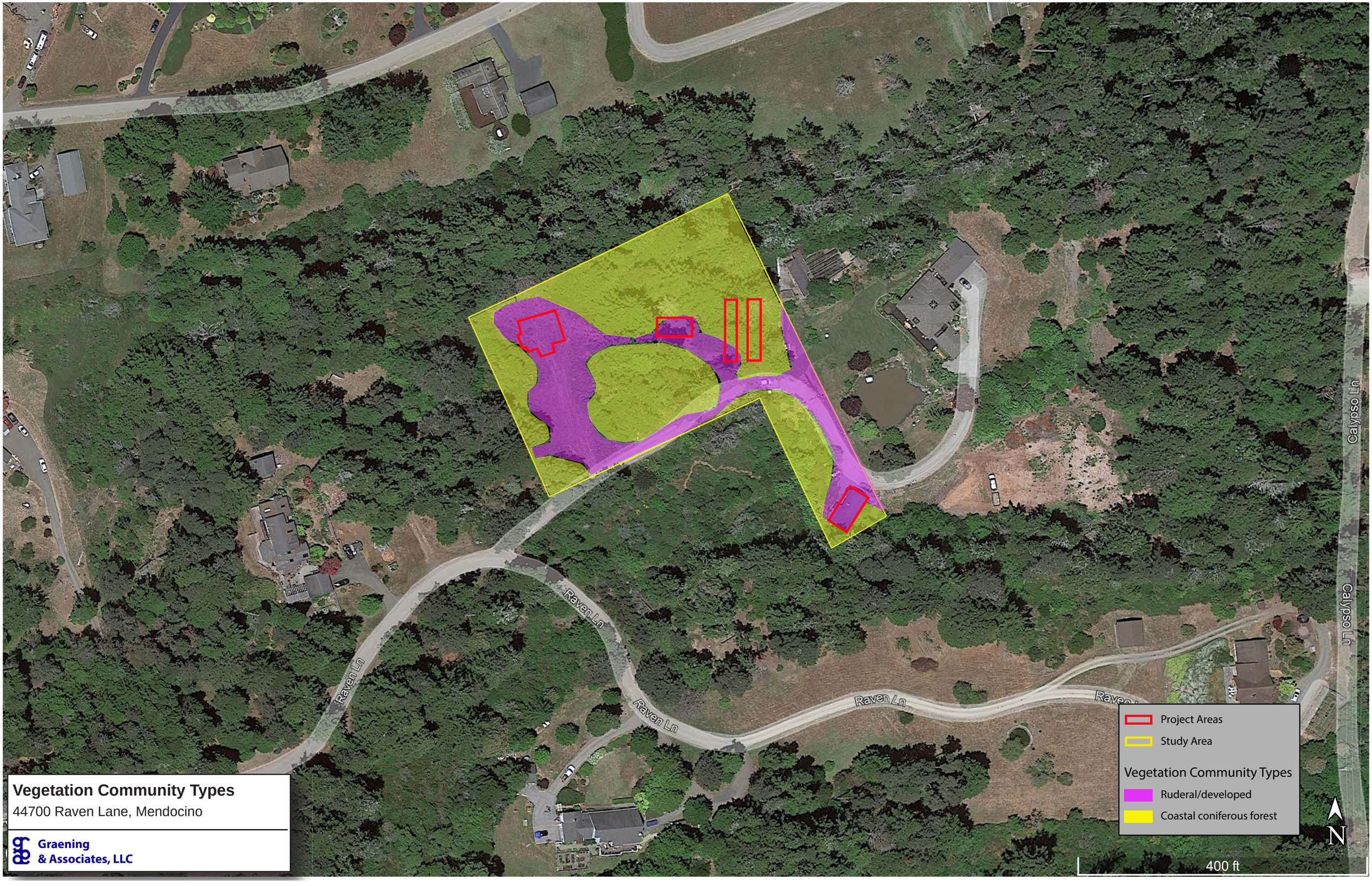
Graening
& Associates, LLC



Project Design Map on Aerial Photo

44700 Raven Lane, Mendocino

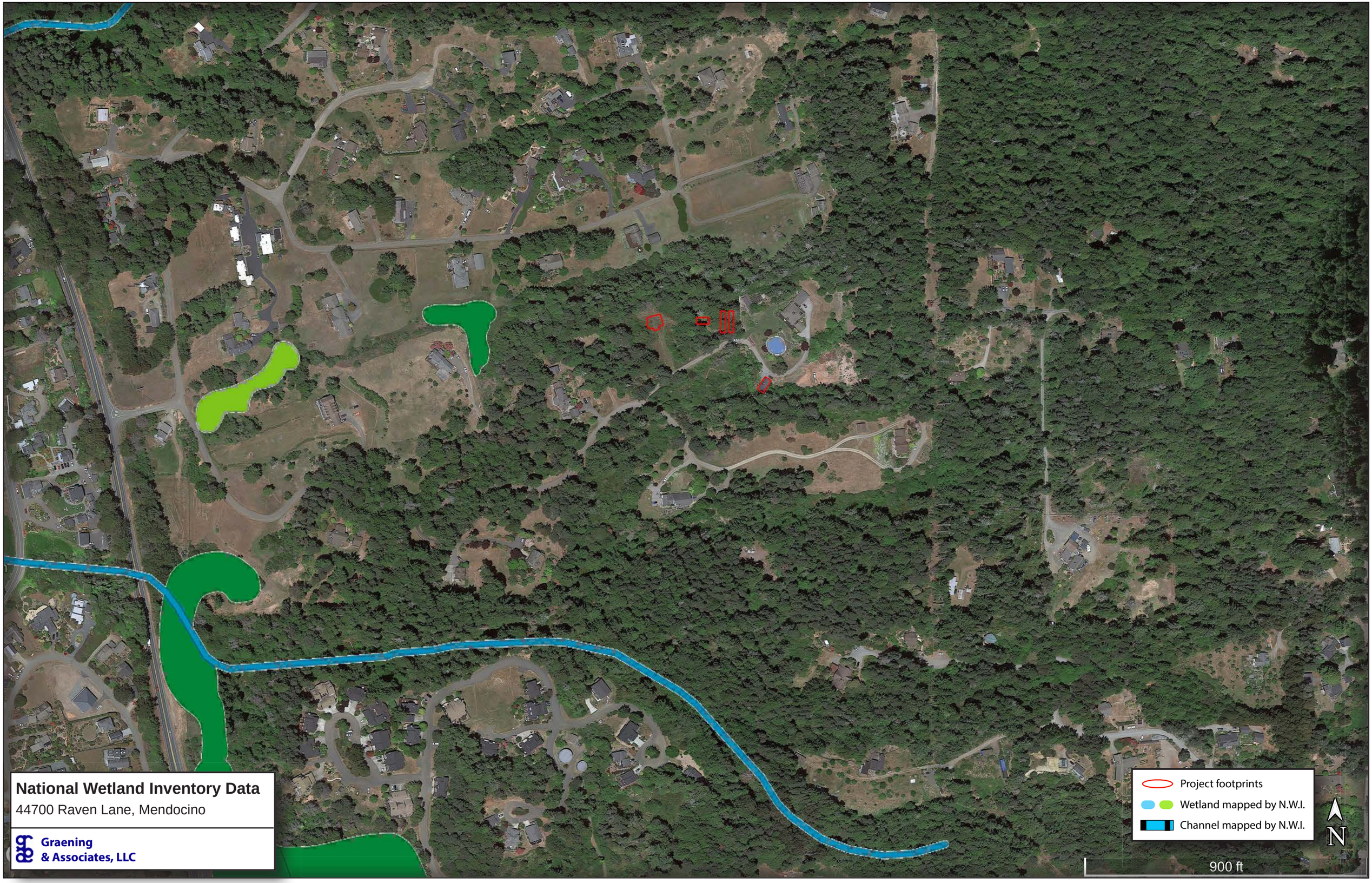
Graening & Associates, LLC



Vegetation Community Types

44700 Raven Lane, Mendocino

Graening & Associates, LLC



National Wetland Inventory Data

44700 Raven Lane, Mendocino

Graening & Associates, LLC



Surface Water Resources

44700 Raven Lane, Mendocino

Graening & Associates, LLC

APPENDIX 1: USFWS SPECIES LIST

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arcata Fish And Wildlife Office
1655 Heindon Road
Arcata, CA 95521-4573
Phone: (707) 822-7201 Fax: (707) 822-8411

In Reply Refer To: 11/20/2024 19:33:57 UTC
Project Code: 2025-0022310
Project Name: Deaton Property Development

Subject: List of threatened and endangered species that may occur in your proposed project location 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, 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 U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

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 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 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:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

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 Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arcata Fish And Wildlife Office
1655 Heindon Road
Arcata, CA 95521-4573
(707) 822-7201

PROJECT SUMMARY

Project Code: 2025-0022310
Project Name: Deaton Property Development
Project Type: Residential Construction
Project Description: new residential construction and translocate cabin (ADU) and build new leachfield
Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.31672765,-123.79266872201505,14z



Counties: Mendocino County, California

ENDANGERED SPECIES ACT SPECIES

There is a total of 13 threatened, endangered, or candidate species on this 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.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Marbled Murrelet *Brachyramphus marmoratus* Population: U.S.A. (CA, OR, WA) There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4467	Threatened
Northern Spotted Owl *Strix occidentalis caurina* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1123	Threatened
Western Snowy Plover *Charadrius nivosus nivosus* Population: Pacific Coast population DPS-U.S.A. (CA, OR, WA), Mexico (within 50 miles of Pacific coast) There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8035	Threatened
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

REPTILES

NAME	STATUS
Green Sea Turtle *Chelonia mydas* Population: East Pacific DPS No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6199	Threatened
Leatherback Sea Turtle *Dermochelys coriacea* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1493	Endangered

FISHES

NAME	STATUS
Tidewater Goby *Eucyclogobius newberryi* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/57	Endangered

INSECTS

NAME	STATUS
Behren's Silverspot Butterfly *Speyeria zerene behrensii* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/900	Endangered
Lotis Blue Butterfly *Lycaeides argyrognomon lotis*	Endangered

NAME	STATUS
There is **proposed** critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/5174	
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

FLOWERING PLANTS

NAME	STATUS
Burke's Goldfields *Lasthenia burkei* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4338	Endangered
Contra Costa Goldfields *Lasthenia conjugens* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7058	Endangered
Showy Indian Clover *Trifolium amoenum* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6459	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider

implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

---

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

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

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Mar 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

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

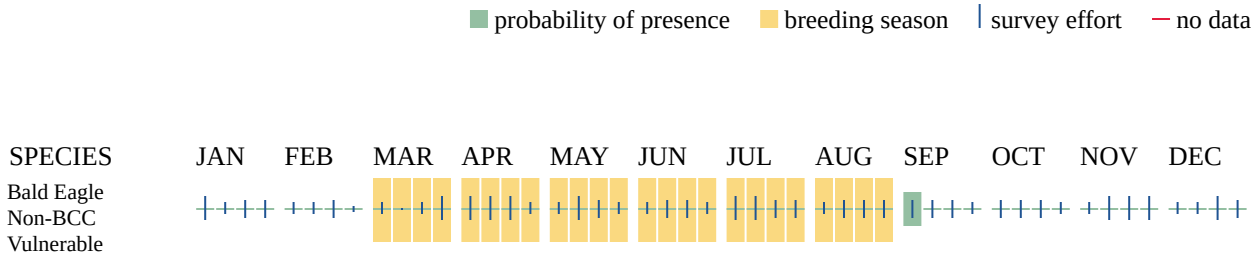
Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

---

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

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

NAME	BREEDING SEASON
Allen's Hummingbird *Selasphorus sasin* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15
Ancient Murrelet *Synthliboramphus antiquus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11929	Breeds Mar 10 to Sep 10
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Mar 1 to Aug 31
Black Oystercatcher *Haematopus bachmani* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9591	Breeds Apr 15 to Oct 31
Black Turnstone *Arenaria melanocephala* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10557	Breeds elsewhere
Brandt's Cormorant *Urile penicillatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11903	Breeds Apr 15 to Sep 15
California Gull *Larus californicus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10955	Breeds Mar 1 to Jul 31
Cassin's Auklet *Ptychoramphus aleuticus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/6967	Breeds Mar 21 to Sep 21
Chestnut-backed Chickadee *Poecile rufescens rufescens* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11913	Breeds Mar 1 to Jul 31
Clark's Grebe *Aechmophorus clarkii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10575	Breeds Jun 1 to Aug 31

NAME	BREEDING SEASON
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Marbled Godwit *Limosa fedoa* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds elsewhere
Oak Titmouse *Baeolophus inornatus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9656	Breeds Mar 15 to Jul 15
Olive-sided Flycatcher *Contopus cooperi* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3914	Breeds May 20 to Aug 31
Oregon Vesper Sparrow *Pooecetes gramineus affinis* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5141	Breeds Apr 21 to Aug 31
Red Knot *Calidris canutus roselaari* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8880	Breeds elsewhere
Rufous Hummingbird *Selasphorus rufus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002	Breeds Apr 15 to Jul 15
Tufted Puffin *Fratercula cirrhata* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/430	Breeds May 5 to Oct 5
Western Grebe *aechmophorus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Western Gull *Larus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11969	Breeds Apr 21 to Aug 25

NAME	BREEDING SEASON
Western Screech-owl *Megascops kennicottii cardonensis* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11923	Breeds Mar 1 to Jun 30
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10669	Breeds elsewhere
Wrentit *Chamaea fasciata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10668	Breeds Mar 15 to Aug 10

PROBABILITY OF PRESENCE SUMMARY

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

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

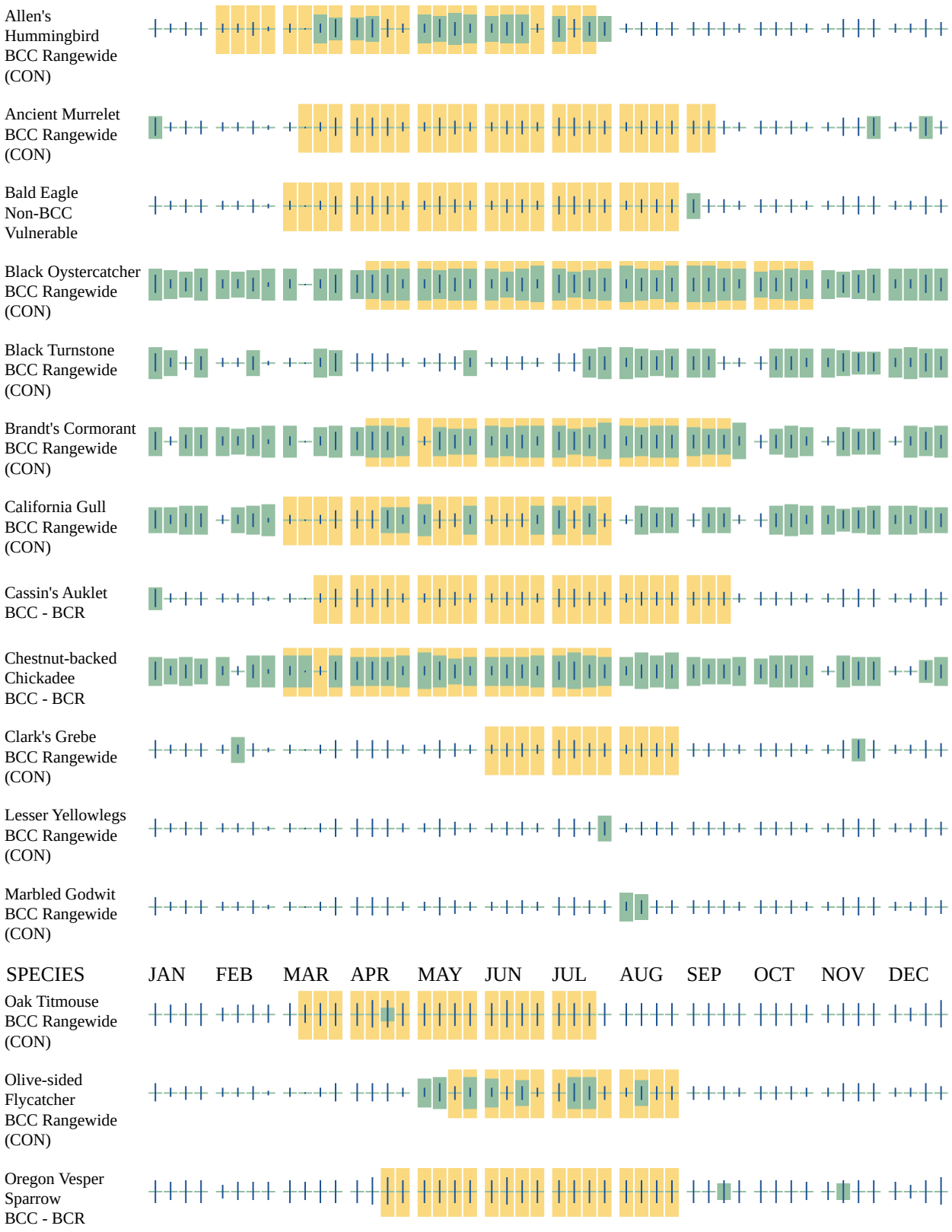
Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

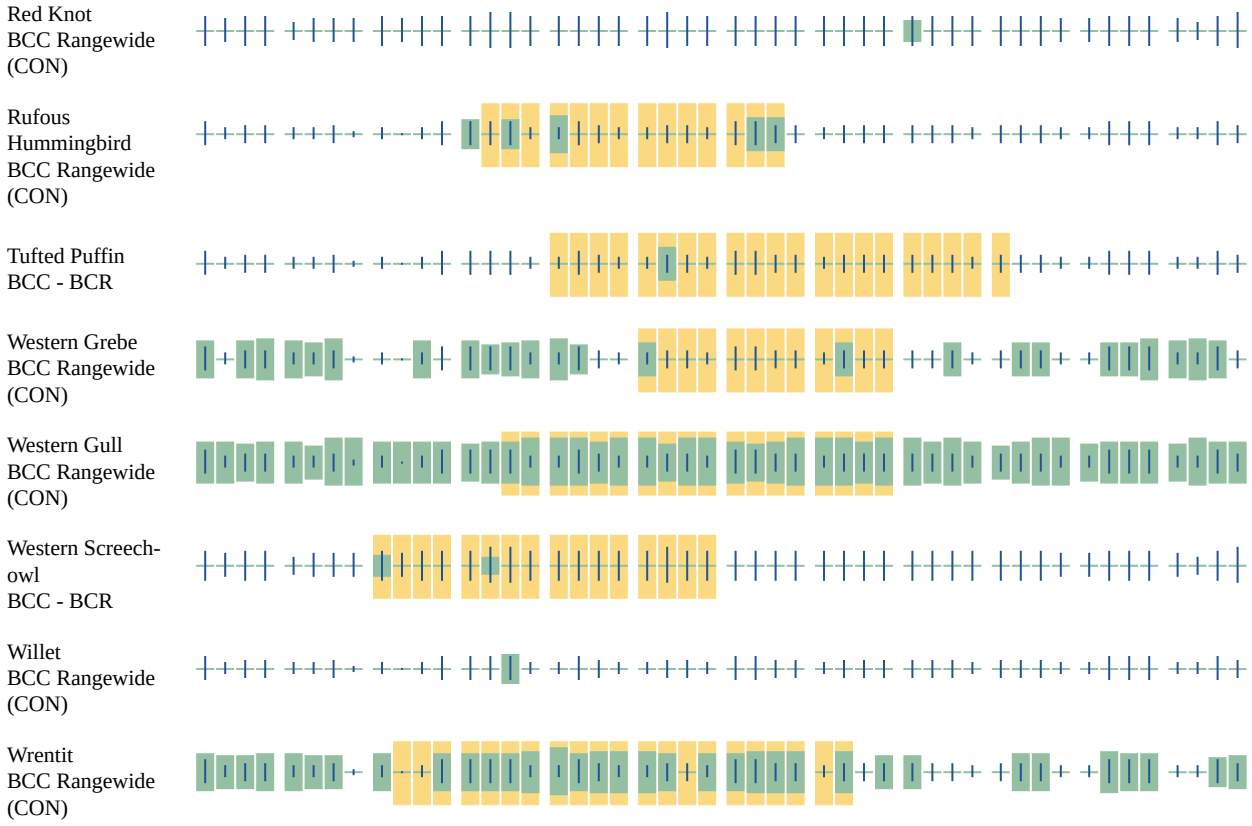
Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data

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


Allen's Hummingbird BCC Rangewide (CON)
Ancient Murrelet BCC Rangewide (CON)
Bald Eagle Non-BCC Vulnerable
Black Oystercatcher BCC Rangewide (CON)
Black Turnstone BCC Rangewide (CON)
Brandt's Cormorant BCC Rangewide (CON)
California Gull BCC Rangewide (CON)
Cassin's Auklet BCC - BCR
Chestnut-backed Chickadee BCC - BCR
Clark's Grebe BCC Rangewide (CON)
Lesser Yellowlegs BCC Rangewide (CON)
Marbled Godwit BCC Rangewide (CON)
SPECIES
JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC
Oak Titmouse BCC Rangewide (CON)
Olive-sided Flycatcher BCC Rangewide (CON)
Oregon Vesper Sparrow BCC - BCR



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
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- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

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

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: G.O. Graening
Address: 343 Carpenter Hill Road
City: Folsom
State: CA
Zip: 95630
Email ggraening@gmail.com
Phone: 9164525442

APPENDIX 2: SITE PHOTOS

PHOTOS OF ADU (CABIN) TO BE RELOCATED








DON'T MAKE
ME
BEAR!

PHOTOS OF LOCATION OF PROPOSED RESIDENCE









PHOTOS OF LOCATION OF LEACH FIELD AND ADU









APPENDIX 3: SPECIAL-STATUS SPECIES TABLE AND POTENTIAL TO OCCUR

Special-status Species Reported by CNDDB and CNPS in the Vicinity of the Study Area

Scientific Name	Common Name	Status*	General Habitat**	Microhabitat**	Potential to Occur in Project Area***
Abronia umbellata var. breviflora	pink sand-verbena	CNPS 1B.1	COASTAL DUNES		Absent: No habitat onsite.
Agrostis blasdalei	Blasdale's bent grass	CNPS 1B.2	COASTAL DUNES, COASTAL BLUFF SCRUB, COASTAL PRAIRIE. INCLUDES AGROSTIS BLASDALEI VAR. MARINENSIS, STATE-LISTED RARE.	SANDY OR GRAVELLY SOIL CLOSE TO ROCKS; OFTEN IN NUTRIENT-POOR SOIL WITH SPARSE VEGETATION. 5-150M.	Absent: No habitat onsite.
Arborimus pomo	Sonoma tree vole	CSSC	NORTH COAST FOG BELT FROM OREGON BORDER TO SOMONA CO. IN DOUGLAS-FIR, REDWOOD & MONTANE HARDWOOD-CONIFER FORESTS.	FEEDS ALMOST EXCLUSIVELY ON DOUGLAS-FIR NEEDLES. WILL OCCASIONALY TAKE NEEDLES OF GRAND FIR, HEMLOCK OR SPRUCE.	Low potential to occur: Marginal habitat is present.
Arctostaphylos nummularia ssp. mendocinoensis	pygmy manzanita	CNPS 1B.2	CLOSED-CONE CONIFEROUS FOREST.	ACIDIC, SANDY-CLAY SOILS IN DWARF CONIFEROUS FOREST. 90-200M.	Absent: No habitat onsite.
Ascaphus truei	Pacific tailed frog	CSSC	OCCURS IN MONTANE HARDWOOD-CONIFER, REDWOOD, DOUGLAS-FIR & PONDEROSA PINE HABITATS.	RESTRICTED TO PERENNIAL MONTANE STREAMS. TADPOLES REQUIRE WATER BELOW 15 DEGREES C.	Absent: No habitat onsite.
Astragalus agnicidus	Humboldt County milk-vetch	CE	BROADLEAFED UPLAND FOREST, REDWOOD FOREST.	DISTURBED OPENINGS IN PARTIALLY TIMBERED FOREST LANDS; ALSO ALONG RIDGELINES; SOUTH ASPECTS. 575-750M.	Absent: No habitat onsite.
Blennosperma nanum var. robustum	Point Reyes blennosperma	CNPS 1B.2	COASTAL PRAIRIE, COASTAL SCRUB.	ON OPEN COASTAL HILLS IN SANDY SOIL. 10-145M.	Absent: No habitat onsite.
Bombus caliginosus	obscure bumble bee	CSSC	GRASSLANDS		Absent: No habitat onsite.
Bombus occidentalis	western bumble bee	CP	GRASSLANDS		Absent: No habitat onsite.
Brachyramphus marmoratus	marbled murrelet	FT, CE	FEEDS NEAR-SHORE; NESTS INLAND ALONG COAST FROM EUREKA TO OREGON BORDER & FROM HALF MOON BAY TO SANTA CRUZ.	NESTS IN OLD-GROWTH REDWOOD-DOMINATED FORESTS, UP TO SIX MILES INLAND, OFTEN IN DOUGLAS-FIR.	Absent: No habitat onsite.
Calamagrostis crassiglumis	Thurber's reed grass	CNPS 2B.1	COASTAL SCRUB, FRESHWATER MARSH.	USUALLY IN MARSHY SWALES SURROUNDED BY GRASSLAND OR COASTAL SCRUB. 10-45M.	Absent: No habitat onsite.
Calileptoneta wapiti	Mendocino leptonetid spider	CSSC	KNOWN ONLY FROM THE TYPE LOCALITY, ELK, AND NEARBY SITES IN MENDOCINO COUNTY.		Absent: No habitat onsite.
Calystegia purpurata ssp. saxicola	coastal bluff morning-glory	CNPS 1B.2	COASTAL DUNES, COASTAL SCRUB.	15-105M.	Absent: No habitat onsite.
Carex californica	California sedge	CNPS 2B.2	BOGS AND FENS, CLOSED-CONE CONIFEROUS FOREST, COASTAL PRAIRIE, MEADOWS, MARSHES AND SWAMPS.	MEADOWS, DRIER AREAS OF SWAMPS, MARSH MARGINS. 90-250M.	Absent: No habitat onsite.
Carex lenticularis var. limnophila	lagoon sedge	CNPS 2B.2	BOGS AND FENS, MARSHES AND SWAMPS, NORTH COAST CONIFEROUS FOREST.	LAKESHORES, BEACHES. 0-6M.	Absent: No habitat onsite.
Carex livida	livid sedge	CNPS 2A	MARSHES AND SWAMPS		Absent: No habitat onsite.
Carex lyngbyei	Lyngbye's sedge	CNPS 2B.2	MARSHES AND SWAMPS (BRACKISH OR FRESHWATER).	0M.	Absent: No habitat onsite.
Carex saliniformis	deceiving sedge	CNPS 1B.2	COASTAL PRAIRIE, COASTAL SCRUB, MEADOWS AND SEEPS, MARSHES AND SWAMPS (COASTAL SALT).	MESIC SITES. 3-230M.	Absent: No habitat onsite.
Castilleja ambigua var. humboldtiensis	Humboldt Bay owl's-clover	CNPS 1B.2	COASTAL SALT MARSH.	IN COASTAL SALTMARSH WITH SPARTINA, DISTICHLIS, SALICORNIA, JAUMEA. 0-3M.	Absent: No habitat onsite.
Castilleja litoralis	Oregon coast paintbrush	CNPS 2B.2	COASTAL BLUFF SCRUB, COASTAL DUNES, COASTAL SCRUB.	SANDY SITES. 15-100M.	Absent: No habitat onsite.
Castilleja mendocinensis	Mendocino Coast paintbrush	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL SCRUB, COASTAL PRAIRIE, CLOSED-CONE CONIFEROUS FOREST, COASTAL DUNES.	OFTEN ON SEA BLUFFS OR CLIFFS IN COASTAL BLUFF SCRUB OR PRAIRIE. 0-160M.	Absent: No habitat onsite.
Charadrius nivosus nivosus	western snowy plover	FT	SANDY BEACHES, SALT POND LEVEES & SHORES OF LARGE ALKALI LAKES.	NEEDS SANDY, GRAVELLY OR FRIABLE SOILS FOR NESTING.	Absent: No habitat onsite.
Chorizanthe howellii	Howell's spineflower	FE, CT	COASTAL DUNES, COASTAL PRAIRIE, COASTAL SCRUB.	SAND DUNES, SANDY SLOPES, AND SANDY AREAS IN COASTAL PRAIRIE. 0-35M.	Absent: No habitat onsite.
Clarkia amoena ssp. whitneyi	Whitney's farewell-to-spring	CNPS 1B.1	COASTAL BLUFF SCRUB, COASTAL SCRUB.	10-100M.	Absent: No habitat onsite.

Coelus globosus	globose dune beetle	CSSC	INHABITANT OF COASTAL SAND DUNE HABITAT; ERRATICALLY DISTRIBUTED FROM TEN MILE CREEK IN MENDOCINO COUNTY SOUTH TO ENSENA	INHABITS FOREDUNES AND SAND HUMMOCKS; IT BURROWS BENEATH THE SAND SURFACE AND IS MOST COMMON BENEATH DUNE VEGETATION.	Absent: No habitat onsite.
Collinsia corymbosa	round-headed collinsia	CNPS 1B.2	COASTAL DUNES.	0-20 M.	Absent: No habitat onsite.
Cornus unalaschkensis	bunchberry	CNPS 2B.2	FOREST UNDERSTORY		Low potential to occur: Marginal habitat is present.
Corynorhinus townsendii	Townsend's big-eared bat	CSSC	THROUGHOUT CALIFORNIA IN A WIDE VARIETY OF HABITATS. MOST COMMON IN MESIC SITES.	ROOSTS IN THE OPEN, HANGING FROM WALLS & CEILINGS. ROOSTING SITES LIMITING. EXTREMELY SENSITIVE TO HUMAN DISTURBANCE.	Absent: No habitat onsite.
Cuscuta pacifica var. papillata	Mendocino dodder	CNPS 1B.2	COASTAL DUNES.	INTERDUNE DEPRESSIONS. ANNUAL PARASITIC VINE OBSERVED ON GNAPHALIUM, SILENE AND LUPINUS. 0-50 M.	Absent: No habitat onsite.
Eastwoodiella californica	swamp harebell	CNPS 1B.2	BOGS AND FENS, CLOSED-CONE CONIFEROUS FOREST, COASTAL PRAIRIE, MEADOWS, FRESHWATER MARSH, N COAST CONIFEROUS FOREST.	BOGS AND MARSHES IN A VARIETY OF HABITATS; UNCOMMON WHERE IT OCCURS. 1-405M.	Absent: No habitat onsite.
Elanus leucurus	white-tailed kite	CSSC	ROLLING FOOTHILLS AND VALLEY MARGINS WITH SCATTERED OAKS & RIVER BOTTOMLANDS OR MARSHES NEXT TO DECIDUOUS WOODLAND.	OPEN GRASSLANDS, MEADOWS, OR MARSHES FOR FORAGING CLOSE TO ISOLATED, DENSE-TOPPED TREES FOR NESTING AND PERCHING.	Absent: No habitat onsite.
Emys marmorata	western pond turtle	FP	A THOROUGHLY AQUATIC TURTLE OF PONDS, MARSHES, RIVERS, STREAMS & IRRIGATION DITCHES, USUALLY WITH AQUATIC VEGETATION, BE	NEED BASKING SITES AND SUITABLE (SANDY BANKS OR GRASSY OPEN FIELDS) UPLAND HABITAT UP TO 0.5 KM FROM WATER FOR EGG-LAYIN	Low potential to occur: Marginal habitat is present.
Erigeron supplex	supple daisy	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL PRAIRIE.	USUALLY IN GRASSY SITES. 10-50 M.	Absent: No habitat onsite.
Erysimum concinnum	bluff wallflower	CNPS 1B.2	COASTAL DUNES, COASTAL BLUFF SCRUB, COASTAL PRAIRIE.	MORE OR LESS A COASTAL GENERALIST WITHIN COASTAL HABITAT TYPES. 0-185 M.	Absent: No habitat onsite.
Erysimum menziesii	Menzies' wallflower	FE, CE	COASTAL DUNES.	LOCALIZED ON DUNES AND COASTAL STRAND. 0-35 M.	Absent: No habitat onsite.
Eucyclogobius newberryi	tidewater goby	FE	BRACKISH WATER HABITATS ALONG THE CALIF COAST FROM AGUA HEDIONDA LAGOON, SAN DIEGO CO. TO THE MOUTH OF THE SMITH RIVER.	FOUND IN SHALLOW LAGOONS AND LOWER STREAM REACHES, THEY NEED FAIRLY STILL BUT NOT STAGNANT WATER & HIGH OXYGEN LEVELS.	Absent: No habitat onsite.
Fratercula cirrhata	tufted puffin	CSSC	OPEN-OCEAN BIRD; NESTS ALONG THE COAST ON ISLANDS, ISLETS, OR (RARELY) MAINLAND CLIFFS.	REQUIRES SOD OR EARTH INTO WHICH THE BIRDS CAN BURROW, ON ISLAND CLIFFS OR GRASSY ISLAND SLOPES.	Absent: No habitat onsite.
Gilia capitata ssp. pacifica	Pacific gilia	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL PRAIRIE, VALLEY AND FOOTHILL GRASSLAND.	5-300M.	Absent: No habitat onsite.
Gilia millefoliata	dark-eyed gilia	CNPS 1B.2	COASTAL DUNES.	2-20M.	Absent: No habitat onsite.
Helminthoglypta arrosa pomoensis	Pomo bronze shoulderband	CSSC	FOUND NEAR THE COAST IN HEAVILY-TIMBERED REDWOOD CANYONS OF MENDOCINO COUNTY.	FOUND UNDER REDWOODS.	Absent: No habitat onsite.
Hemizonia congesta ssp. congesta	congested-headed hayfield tarplant	CNPS 1B.2	GRASSLANDS		Absent: No habitat onsite.
Hesperevax sparsiflora var. brevifolia	short-leaved evax	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL DUNES.	SANDY BLUFFS AND FLATS. 0-200M.	Absent: No habitat onsite.
Hesperocyparis pygmaea	pygmy cypress	CNPS 1B.2	CLOSED-CONE CONIFEROUS FOREST.	ON PODZOL-LIKE BLACKLOCK SOIL IN PYGMY CYPRESS FOREST COMMUNITY. 35-305M.	Absent: No habitat onsite.
Horkelia marinensis	Point Reyes horkelia	CNPS 1B.2	COASTAL DUNES, COASTAL PRAIRIE, COASTAL SCRUB.	SANDY FLATS AND DUNES NEAR COAST; IN GRASSLAND OR SCRUB PLANT COMMUNITIES. 5-30M.	Absent: No habitat onsite.
Hydrobates homochroa	ashy storm-petrel	CSSC	COLONIAL NESTER ON OFF-SHORE ISLANDS. USUALLY NESTS ON DRIEST PART OF ISLANDS. FORAGES OVER OPEN OCEAN.	NEST SITES ON ISLANDS ARE IN CREVICES BENEATH LOOSELY PILED ROCKS OR DRIFTWOOD, OR IN CAVES.	Absent: No habitat onsite.
Juncus supiniformis	hair-leaved rush	CNPS 2B.2	MARSHES AND SWAMPS, BOGS AND FENS.	20-100M.	Absent: No habitat onsite.
Kopsiopsis hookeri	small groundcone	CNPS 2B.3	NORTH COAST CONIFEROUS FOREST.	OPEN WOODS, SHRUBBY PLACES, GENERALLY ON GAULTHERIA SHALLON. 90-885M.	Absent: No habitat onsite.
Lasthenia californica ssp. bakeri	Baker's goldfields	CNPS 1B.2	CLOSED-CONE CONIFEROUS FOREST, COASTAL SCRUB.	OPENINGS. 60-520M.	Low potential to occur: Marginal habitat is present.
Lasthenia californica ssp. macrantha	perennial goldfields	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL DUNES, COASTAL SCRUB.	5-520M.	Absent: No habitat onsite.

Lathyrus palustris	marsh pea	CNPS 2B.2	BOGS & FENS, LOWER MONTANE CONIF. FOREST, MARSHES & SWAMPS, N. COAST CONIFEROUS FOREST, COASTAL PRAIRIE, COASTAL SCRUB.	MOIST COASTAL AREAS. 1-100M.	Low potential to occur: Marginal habitat is present.
Lilium maritimum	coast lily	CNPS 1B.1	CLOSED-CONE CONIFEROUS FOREST, COASTAL PRAIRIE, COASTAL SCRUB, BROADLEAVED UPLAND FOREST, NORTH COAST CONIFEROUS FOREST.	HISTORICALLY IN SANDY SOIL, OFTEN ON RAISED HUMMOCKS OR BOGS; TODAY MOSTLY IN ROADSIDE DITCHES. 10-335M.	Low potential to occur: Marginal habitat is present.
Microseris borealis	northern microseris	CNPS 2B.1	BOGS AND FENS, MEADOWS AND SEEPS, LOWER MONTANE CONIFEROUS FOREST.	1000-2000 M.	Absent: No habitat onsite.
Noyo intersessa	Ten Mile shoulderband	CSSC	FOUND IN COASTAL DUNES, COASTAL SCRUB, AND RIPARIAN REDWOOD FOREST HABITATS.		Absent: No habitat onsite.
Oncorhynchus kisutch pop. 4	coho salmon - central California coast ESU	FE, CE	FEDERAL LISTING = POPS BETWEEN PUNTA GORDA & SAN LORENZO RIVER. STATE LISTING = POPS SOUTH OF PUNTA GORDA.	REQUIRE BEDS OF LOOSE, SILT-FREE, COARSE GRAVEL FOR SPAWNING. ALSO NEED COVER, COOL WATER & SUFFICIENT DISSOLVED OXYGEN.	Absent: No habitat onsite.
Oncorhynchus mykiss irideus pop. 49	steelhead - northern California DPS winter-run	FT	STREAMS WITH GRAVEL		Absent: No habitat onsite.
Packera bolanderi var. bolanderi	seacoast ragwort	CNPS 2B.2	COASTAL SCRUB, NORTH COAST CONIFEROUS FOREST.	SOMETIMES ALONG ROADSIDES. 30-915 M.	Low potential to occur: Marginal habitat is present.
Pandion haliaetus	osprey	CSSC	OCEAN SHORE, BAYS, FRESH-WATER LAKES, AND LARGER STREAMS.	LARGE NESTS BUILT IN TREE-TOPS WITHIN 15 MILES OF A GOOD FISH-PRODUCING BODY OF WATER.	Absent: No habitat onsite.
Phacelia insularis var. continentis	North Coast phacelia	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL DUNES.	OPEN MARITIME BLUFFS, SANDY SOIL, SOMETIMES ROCKY HABITATS. 10-170 M.	Absent: No habitat onsite.
Pinus contorta ssp. bolanderi	Bolander's beach pine	CNPS 1B.2	CLOSED-CONE CONIFEROUS FOREST.	PODZOL-LIKE SOILS WITH MENDOCINO CYPRESS AND BISHOP PINE; WITHIN PYGMY CYPRESS FOREST. 35-250M.	Absent: No habitat onsite.
Piperia candida	white-flowered rein orchid	CNPS 1B.2	NORTH COAST CONIFEROUS FOREST, LOWER MONTANE CONIFEROUS FOREST, BROADLEAFED UPLAND FOREST.	COAST RANGES FROM SANTA CRUZ COUNTY NORTH; ON SERPENTINE. FOREST DUFF, MOSSY BANKS, ROCK OUTCROPS & MUSKEG. 0-1200M.	Absent: No habitat onsite.
Plebejus anna lotis	lotis blue butterfly	FE	INHABITS WET MEADOWS OR POORLY-DRAINED SPHAGNUM-WILLOW BOGS, WHERE SOILS ARE WATERLOGGED & ACIDIC; NORTH COASTAL CALIF.	INHABITS UPPER EDGES OF PEAT BOG BETWEEN PEAT & SURROUNDING LOW WILLOWS; HOSTPLANT IS LOTUS FORMOSISSIMUS.	Absent: No habitat onsite.
Progne subis	purple martin	CSSC	INHABITS WOODLANDS, LOW ELEVATION CONIFEROUS FOREST OF DOUGLAS-FIR, PONDEROSA PINE, & MONTEREY PINE.	NESTS IN OLD WOODPECKER CAVITIES MOSTLY, ALSO IN HUMAN-MADE STRUCTURES. NEST OFTEN LOCATED IN TALL, ISOLATED TREE/SNAG.	Low potential to occur: Marginal habitat is present.
Puccinellia pumila	dwarf alkali grass	CNPS 2B.2	ALKALINE SOILS		Absent: No habitat onsite.
Ramalina thrausta	angel's hair lichen	CNPS 2B.1	OLD GROWTH FORESTS		Absent: No habitat onsite.
Rana aurora	northern red-legged frog	CSSC	HUMID FORESTS, WOODLANDS, GRASSLANDS, & STREAMSIDES IN NORTHWESTERN CALIFORNIA, USUALLY NEAR DENSE RIPARIAN COVER.	GENERALLY NEAR PERMANENT WATER, BUT CAN BE FOUND FAR FROM WATER, IN DAMP WOODS AND MEADOWS, DURING NON-BREEDING SEASON.	Low potential to occur: Marginal habitat is present.
Rana boylii pop. 1	foothill yellow-legged frog - north coast DPS	CSSC	FRESHWATER STREAMS		Absent: No habitat onsite.
Rhyacotriton variegatus	southern torrent salamander	CSSC	COASTAL REDWOOD, DOUGLAS-FIR, MIXED CONIFER, MONTANE RIPARIAN, AND MONTANE HARDWOOD-CONIFER HABITATS. OLD GROWTH FOREST.	COLD, WELL-SHADED, PERMANENT STREAMS AND SEEPAGES, OR WITHIN SPLASH ZONE OR ON MOSS-COVERED ROCK WITHIN TRICKLING WATER.	Absent: No habitat onsite.
Rhynchospora alba	white beaked-rush	CNPS 2B.2	BOGS AND FENS, MARSHES AND SWAMPS.	FRESHWATER MARSHES AND SPHAGNUM BOGS. 60-2000M.	Absent: No habitat onsite.
Sanguisorba officinalis	great burnet	CNPS 2B.2	BOGS & FENS, MEADOWS & SEEPS, BROADLEAFED UPLAND FOREST, MARSHES & SWAMPS, NORTH COAST CONIFEROUS FOREST, RIPAR. FOREST.	ROCKY SERPENTINE SEEPAGE AREAS AND ALONG STREAM BORDERS. 60-1400M.	Absent: No habitat onsite.
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	CNPS 1B.2	MARSHES AND SWAMPS.	FRESHWATER MARSHES NEAR THE COAST. 5-75(245)M.	Absent: No habitat onsite.
Sidalcea malviflora ssp. patula	Siskiyou checkerbloom	CNPS 1B.2	COASTAL PRAIRIE, BROADLEAFED UPLAND FOREST.	OPEN COASTAL FOREST. 15-65M.	Absent: No habitat onsite.
Sidalcea malviflora ssp. purpurea	purple-stemmed checkerbloom	CNPS 1B.2	BROADLEAFED UPLAND FOREST, COASTAL PRAIRIE.	15-65M.	Absent: No habitat onsite.
Speyeria zerene behrensii	Behren's silverspot butterfly	FE	RESTRICTED TO THE PACIFIC SIDE OF THE COAST RANGES, FROM POINT ARENA TO CAPE MENDOCINO, MENDOCINO CO.	INHABITS COASTAL TERRACE PRAIRIE HABITAT. FOODPLANT IS VIOLA SP.	Absent: No habitat onsite.

Speyeria zerene behrensii	Behren's silverspot butterfly	FE	RESTRICTED TO THE PACIFIC SIDE OF THE COAST RANGES, FROM POINT ARENA TO CAPE MENDOCINO, MENDOCINO CO.	INHABITS COASTAL TERRACE PRAIRIE HABITAT. FOODPLANT IS VIOLA SP.	Absent: No habitat onsite.
Taricha rivularis	red-bellied newt	CSSC	FRESHWATER STREAMS		Absent: No habitat onsite.
Trifolium buckwestiorum	Santa Cruz clover	CNPS 1B.1	COASTAL PRAIRIE, BROADLEAFED UPLAND FOREST, CISMONTANE WOODLAND.	MOIST GRASSLAND. GRAVELLY MARGINS. 105-610 M.	Absent: No habitat onsite.
Trifolium trichocalyx	Monterey clover	FE, CE	CLOSED-CONE CONIFEROUS FOREST.	POORLY DRAINED, LOW NUTRIENT SOIL UNDERLAIN W/HARDPAN; ALSO OPENINGS AND BURNED AREAS. 30-240 M.	Low potential to occur: Marginal habitat is present.
Triquetrella californica	coastal triquetrella	CNPS 1B.2	COASTAL BLUFF SCRUB, COASTAL SCRUB VALLEY AND FOOTHILL GRASSLANDS.	GROWS WITHIN 30M FROM THE COAST IN COASTAL SCRUB, GRASSLANDS AND IN OPEN GRAVELS ON ROADSIDES, HILLSIDES, ROCKY SLOPES,	Absent: No habitat onsite.
Viola palustris	alpine marsh violet	CNPS 2B.2	COASTAL SCRUB, BOGS AND FENS.	SWAMPY, SHRUBBY PLACES IN COASTAL SCRUB OR COASTAL BOGS. 0-15M.	Absent: No habitat onsite.

*Definitions of Status Codes: FE = Federally listed as endangered; FT = Federally listed as threatened; FC = Candidate for Federal listing; CE = California State listed as endangered; CT = California State listed as threatened; CSSC = California species of special concern; CRPR (California Rare Plant Rank) List 1A = Plants presumed extinct in California by; CRPR List 1B = Plants designated rare, threatened or endangered in California and elsewhere; CRPR List 2A = Plants presumed extirpated in California but common elsewhere; CRPR 2B = Plants rare threatened or endangered in California, but more common elsewhere; CRPR 3 Review List: Plants about which more information is needed and CRPR 4 = Watch List: Plants of limited distribution. CRPR Threat Ranks: 0.1 = seriously threatened in California; S2 = moderately threatened in California; S3 = not very threatened in California .

**Copied verbatim from CNDDB, unless otherwise noted.

***Definitions of Occurrence Probability Rankings:

- Present: Species was observed during site visit. Or
- Present: Species has been previously documented to occur within the Study Area.
- Potential to occur: Suitable habitat present.
- Low potential to occur: Marginal habitat is present.
- Absent: No habitat onsite.