



Garcia and Associates
2601 Mission Street, Suite 600
San Francisco, CA 94110
Phone: (415) 642-8969
Fax: (415) 642-8967

To: Molly Sandomire, TRC
From: Joe Drennan
Date: October 3, 2016
RE: Fulton-Fitch Mountain Reconductoring Project Special-Status Plant Surveys

Garcia and Associates (GANDA) conducted special-status plant surveys for the Fulton-Fitch Mountain Reconductoring Project in 2011 and 2012. Results of the surveys were presented in a Biological Resources Technical Report (BRTR) for the project completed in 2012. Currently, the project is in review by the CPUC and a request was made to clarify the survey protocol for special-status plants. Specifically, the following issue was identified:

Issue: Portions of the project study area are located in the Santa Rosa Plain Conservation Strategy (SRPCS) area and within the range of federally listed plants that may require mitigation. The BRTR prepared by GANDA (2012) describes protocol level surveys for special-status plants, but it is not clear if the surveys were conducted according to the required survey protocol for the federally listed plants identified in the SRPCS (USFWS 2005).

Response: Surveys for federally listed plants covered by the SRPCS were conducted in accordance with the “Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain”.

In 2011 and 2012, seasonally-timed surveys were conducted by qualified botanists with concurrent visits to reference populations of the target species. A total of 5 rounds were conducted over the 2-year period. All plant taxa observed during surveys were recorded to the taxonomic level required to determine if they had special-status. Documentation of the surveys included a table of survey dates and personnel, a table of the reference sites visited with dates and maps of the survey area. Surveyors were not able to find a publically accessible reference population of many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*). Further research indicated that populations of this species are not publically accessible and the species

may no longer be extant in the area. Aside from this deviation from the guidelines, all other aspects were implemented.

References

Garcia and Associates (GANDA), 2012. *Biological Resources Technical Report, Pacific Gas & Electric Company's Fulton-Fitch 60kV Power Line Reconductor Project, Sonoma County, California*. Unpublished report prepared for Pacific Gas & Electric Company, San Ramon, CA.

United States Fish and Wildlife Service (USFWS), 2005. *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain*. Online: https://www.fws.gov/sacramento/es/recovery-planning/Santa-Rosa/Documents/Appendix_D_%20FWS_Plant_Survey_Protocols.pdf. Site visited October 3, 2016.