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Governor's Office of Planning & Research

MAR 17 2020

March 17, 2020

STATE CLEARINGHOUSE

Carol Ann Gregory, Associate Planner
Sacramento County, Office of Planning and Environmental Review
827 7th Street, Room 225
Sacramento, CA 95814

Dear Ms. Gregory:

HAZEL AVENUE/U.S. 50 INTERCHANGE PROJECT (PROJECT)
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) SCH# 2016022009

The California Department of Fish and Wildlife (CDFW) received a DEIR from Sacramento County (County) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Project as proposed may result in “take²” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The Project is located at the existing Hazel Avenue/US 50 interchange within Sacramento County and the City of Rancho Cordova. The Project area is bounded along Hazel Avenue by the Tributary Point/westbound off-ramp intersection to the north and extends approximately 1,000 feet south of Folsom Boulevard to a future intersection within the Easton Place development. The Project limits along US 50 begin approximately 3,200 feet west of the existing Hazel Avenue Overcrossing and extend 2,500 feet east of the Natoma Overhead (post miles 15.0 to 17.2). Improvements along Folsom Boulevard would extend from approximately 1,200 feet west of the Hazel Avenue intersection to 900 feet east of the intersection.

The Project proposes to modify the existing Hazel Avenue/US 50 interchange and extend and grade-separate Hazel Avenue over Folsom Boulevard and rail corridor. Hazel Avenue will be extended south to a proposed intersection with the future Atlanta Street (a new roadway that will be constructed as part of the Easton Place development). The Project also includes: Construction of a portion of an eastbound auxiliary lane on US 50 from Hazel Avenue to the Folsom Boulevard Overcrossing, also known as the Natoma Overhead, the modification of the existing Aerojet Road off-ramp from US 50, reconstruction of the US 50 westbound loop on-ramp, reconstruction of the US 50 eastbound diagonal off-ramp, and both eastbound on-ramps, Eastbound US 50 on- and off-ramp auxiliary lanes, from west of the Hazel Avenue eastbound off-ramp, and from the loop on-ramp extending to the Folsom Boulevard interchange.

The Project description in the final EIR should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the County in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

² Section 86 of the Fish and Game Code defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”

Comment 1: Relevant State laws and regulations list is incomplete.

Page 2.19-1 of the DEIR lists State laws and regulations relevant to wildlife not listed as *threatened* or *endangered* under either the federal or state Endangered Species Acts. The list does not include the following code sections which are relevant to the Project:

- Section 3503 of the California Fish and Game Code (nests or eggs of birds)
- Section 3503.5 of the California Fish and Game Code (birds of prey, nests, eggs)
- Section 3511 of the California Fish and Game Code (Fully Protected birds)

To address this comment, CDFW recommends revising the list to include these relevant code sections.

Comment 2: Impact conclusion describes incorrect implementation for White-tailed kite (*Elanus leucurus*).

Page 2.19-17 *Impact Conclusion* of the DEIR analyzes impacts to White-tailed kite, a fully protected species under Section 3511 California Fish and Game Code. As such, only avoidance measures are appropriate to ensure compliance, not necessarily minimization and mitigation measures as well.

To address this comment, CDFW recommends Page 2.19-17 be revised to state:

"Implementation of avoidance measures described below would reduce potential impacts on white-tailed kite."

Comment 3: List of BMPs for invasive plant species can be enhanced

Page 2.21-3 of the DEIR lists Best Management Practices (BMPs) that avoid and minimize potential introduction of new invasive plants to the Project area. CDFW recommends adding the following BMPs to this list as well:

- Decontaminate project equipment and gear
- Establish a vehicle wash station
- Ensure straw waddles do not contain plastic monofilament netting that may entrap wildlife or fail to degrade

Comment 4: Mitigation Measure BIO-7 and BIO-8 does not disclose CDFW-approval of Riparian and Wetland Mitigation

As identified on Page 6 of the DEIR, the Project will Notify CDFW under Section 1602 of the Fish and Game Code. Activities that alter riparian, wetland, and non-wetland waters during the Project may fall under the authority of the Fish and Game Code. As a result, any compensatory mitigation for these activities, would require a ratio or acreage amount and location approved by CDFW through a Lake or Streambed Alteration Agreement.

To address this deficiency in the DEIR, CDFW recommends that BIO-7 and BIO-8 be revised to disclose that activities subject to Notification would require CDFW-approved compensatory mitigation to offset impacts. Likewise, to the extent offsite credits are utilized, the mitigation should occur at a CDFW-approved mitigation or conservation bank.

Comment 5: Mitigation Measure BIO-13 revisions needed to adequately mitigate impacts to Impact BIO-4 to less-than-significant

Mitigation Measure BIO-13 (also included on Page 2.19-22 of Section 2.19.4.1) of the DEIR proposes measures for reducing impacts to White-tailed kite. This measure does not adequately avoid impacts to comply with the Fish and Game Code.

To correct this, CDFW recommends the measure be revised to state:

"For each year in which construction, grading, or project-related improvements are to commence between February 1 and September 15, a focused survey for white-tailed kite nests on the site and within 0.25 mile of the site will be conducted by a qualified biologist no greater than 15 days prior to the start of construction work (including clearing and grubbing). If White-tailed kites are found, the qualified Biologist shall develop a species-specific avoidance plan for CDFW review and approval. Any measures approved in the plan will be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, nothing further will be required. If a lapse in project-related activities of 14 days or longer occurs, another focused survey is required before Project activities can be reinitiated.

If impacts are identified during the course of the project, project personnel shall fully avoid impacts to the species and immediately notify CDFW if White-tailed kite is detected during Project activities."

Please note that the DEIR includes Swainson's hawk in this measure. CDFW recommends this measure independently address White-tailed kite, since the species have different life histories and statuses. Separate comments on Swainson's hawk are written below.

Comment 6: Mitigation Measure BIO-13 revisions needed to adequately mitigate impacts to Impact BIO-4 to less-than-significant

Mitigation Measure BIO-13 (also included on Page 2.19-22 of Section 2.19.4.1) of the DEIR proposes measures for reducing impacts to Swainson's hawk (*Buteo swainsoni*). This measure does not adequately avoid impacts to comply with the Fish and Game Code.

To correct this, CDFW recommends adding the following measure that specifically addresses Swainson's hawk:

"If equipment staging, site preparation, grading, excavation or other project-related activities are scheduled during the Swainson's hawk nesting season (typically March 1 through September 15) surveys for active nests of such birds shall be conducted by a qualified biologist in accordance with the typical survey protocol: Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee 2000). Surveys shall be conducted at the appropriate radius and time periods listed in the survey protocol. Since the project spans over multiple years, a new survey shall be conducted for each nesting season to capture any new Swainson's hawk nests that may be established.

If an active Swainson's hawk nest is found during project surveys, the qualified biologist shall consult with CDFW and demonstrate compliance with CESA. If during consultation it is determined that implementation of the project as proposed may result in take of Swainson's hawk, the project may seek related take authorization as provided by the Fish and Game Code."

As the DEIR indicates that Swainson's hawk was observed in the Project area during the cursory surveys in 2016, CDFW recommends starting the above referenced survey in the spring prior to Project implementation. If the survey results indicate presence of Swainson's hawk, CDFW recommends that the Project apply for an Incidental Take Permit (Fish & G. Code, § 2080 et. seq) for take of listed species.

Comment 7: BIO-14 revisions needed to more effectively mitigate Impact BIO-9 to less-than-significant

Mitigation Measure BIO-14 of the DEIR describes preconstruction surveys for nesting migratory birds. For clarity during implementation, this measure should define the survey methodology.

To address this concern, CDFW recommends updating with the following information (revisions underlined):

"In each year in which project activities would occur during the breeding season (generally February 1 through September 15), the County or Contractor will retain a qualified wildlife biologist with knowledge of the relevant species to conduct nesting surveys 15 days or less before the start of construction. Surveys will include a search of all trees and shrubs, marsh, wetland, manmade structures, and ruderal vegetation that provide suitable nesting habitat in the project area including staging and stockpile areas. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos. If no active nests are detected during these surveys, no additional measures are required. If a lapse in project-related activities of 14 days or longer occurs, another focused survey will be required before project activities can be reinitiated.

If an active nest is found in the survey area, a no-disturbance buffer will be established with fences or flags around the nest buffer area to avoid disturbance or destruction of the site until the end of the breeding season (September 15) or until after a qualified wildlife biologist determines that the young have fledged and moved out of the project area (this date varies by species). The extent of these buffers will be determined by the biologist in coordination with USFWS and CDFW and will depend on the level of noise or construction disturbance, line-of-sight between the nest and the disturbance, ambient levels of noise and other disturbances, and other topographical or artificial barriers. Suitable buffer distances may vary between species. If nesting birds are showing signs of distress or disruptions to nesting behaviors or the buffer is otherwise not feasible, the qualified wildlife biologist, in coordination with USFWS and CDFW, shall determine the appropriate change in response (e.g. buffer increase, temporary construction stop, etc.) until no further interruptions to breeding behavior are detectable.

Comment 8: Mitigation Measure BIO-15 revisions needed to adequately mitigate impacts to bats to less-than-significant

Mitigation Measure BIO-15 (also included on Page 2.19-25 of Section 2.19.4.1) is for identifying, avoiding, and minimizing impacts to roosting bats. As written, the measure does not fully encompass all potential habitat or effectively minimize impacts.

To address this CDFW recommends the DEIR be revised to include the following:

- Habitat assessment and survey by a qualified bat biologist
- Examining all suitable habitats prior to project implementation (including tree removal, tree trimming, or other disturbance). BIO-15 should include also habitats in manmade structures (e.g. bridge, culvert, etc.)
- Including development of a Bat Avoidance and Minimization Plan (Bat Plan) in the event that bats are utilizing the Project area during Project activities. The Bat Plan should include 1) Project-specific measures to avoid and minimize impacts to roosting bats in and near the areas that will be disturbed by Project activities 2) monitoring by a qualified bat biologist to oversee bat behavior and the avoidance and minimizations measures designed to protect nesting/roosting bats 3) exclusion measures for the habitat that will be removed or made inaccessible by the Project and 4) discussion of available alternative habitat (both temporary and permanent).

All appropriate exclusionary measures should be implemented prior to the bridge construction during the period of March 1 to April 15 or August 31 to October 15. Potential avoidance efforts may include exclusionary blocking or filling potential roosting cavities with foam or steel wool, visual monitoring, and staging Project work to avoid bats. If bats are known to use manmade structures, exclusion netting should not be used to avoid entanglement.

Comment 9: Potential impact to special-status plants not disclosed, nor adequately mitigated to less-than significant

Table 2.18-1 of the DEIR identifies habitat present for the following species: Brandegee's clarkia (*Clarkia biloba ssp. Brandegeae*), legenera (*Legenere limosa*), and Sanford's arrowhead (*Sagittaria sanfordii*). Section 2.18.3.1 evaluates that the Project would result in "no impacts on special-status plants" because appropriately timed botanical surveys were conducted. Although CDFW recognizes that surveys may have indicated negative results in 2016, suitable habitat features may support special-status plants by the time the Project reaches implementation. As a result, five or more years may have passed since the last survey date.

To correct this potential issue, CDFW recommends incorporating the following measure:

"A one-time pre-construction plant survey shall be performed during the appropriate blooming period for all special-status plant species with potential to occur that may be impacted within the project site. If the survey results are negative, no further action by Permittee is needed. If the survey finds that any special-status plant species are present, Permittee shall consult with CDFW on the appropriate action and the inclusion of any additional measures."

Comment 10: Project landscaping can be enhanced

CDFW has noted that the DEIR includes Project plans for landscaping improvements in the Project area. CDFW recommends consideration of the Homegrown Habitat Plant List (Sacramento Valley Chapter, California Native Plant Society), provided as Attachment 1, when developing the final planting palette for landscaped areas such as medians, shoulders, etc. The Homegrown Habitat Plant List (HHPL) is the result of a coordinated effort of regional stakeholders with the intent of improving landscape plantings for the benefit of property owners and ecosystem. Including plants from the HHPL is intended to produce the following outcomes for landscaping:

- Increased drought tolerance
- Decreased water use
- Decreased maintenance and replacement planting costs
- Increased functionality for local pollinators and wildlife
- Increase in overall biodiversity and ecosystem health
- Increased carbon sequestration and climate change resilience
- Educational opportunities for staff and students

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link:

http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR and assist the Lead Agency in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Dylan Wood, Environmental Scientist at 916-358-2384 or dylan.a.wood@wildlife.ca.gov.

Enclosure: Attachment 1- Homegrown Habitat List

Sincerely,



Kevin Thomas
Regional Manager

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Kelley Barker, kelley.barker@wildlife.ca.gov
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Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento

Homegrown Habitat Plant List 2019

	A	B	C	D	E	F	G	H
	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
36	Mid	California Buckwheat	Eriogonum fasciculatum	P	2.5'	VL/L	FS	Tough, easy to grow, prefer good drainage
37		Hoary Coffeberry	Frangula californica var tomentosa	P	20'	L	FS/PS	May prefer PM shade in valley
38		California Wildrose	Rosa californica	P	8'	M	FS/PS	Tolerates clay soils; drought-tolerant; spreads through underground runners
39		California Wild Grape	Vitis californica	P	10'-40'	L/M	FS/PS	Common along rivers and streams, winter deciduous
40		Common Yarrow	Achillea millefolium	P	3'	L-H	FS/PS	Looks best with regular water; semi deciduous in drier conditions; can be aggressive
41		Coyote Mint	Monardella villosa	P	2'	L	PS/S	Requires good drainage, needs PM shade in the valley
42		Showy Milkweed	Asclepias speciosa	P	5'	L/M	FS	Tolerates clay soils; spreads through underground rhizomes
43		Imbricate Phacelia	Phacelia imbricata	P	1'	L	FS/PS	Perennial herb; tolerates clay soil; can re-seed
44		Woolly Sunflower	Eriophyllum lanatum	P	2'	L	FS/PS	Summer semi-deciduous; can be extremely drought-tolerant
45		Nude Buckwheat	Eriogonum nudum	P	6'	L	FS	Summer semi-deciduous; leafless stems
46		Blue Wild Rye	Elymus glaucus	P	5'	L	FS/PS	Popular accent grass for gardens; summer semi-deciduous
47		Deergrass	Muhlenbergia rigens	P	5'	L	FS	Attractive bunch grass; easy to grow; grows in most soils
48		Fleabane Daisy	Erigeron foliosus	P	3.3'	L	PS	
49	Mid-Late	Lippia	Phyla nodiflora	P	6"	L	FS/PS	Flowering ground cover; spreads rapidly
50		Spider Lupine	Lupinus benthamii	A	2.3'	VL	FS	
51		Seep Monkeyflower	Erythranthe guttata	A	5'	M/H	FS/PS	Aquatic annual plant; good in ponds or rain gardens
52								
53								
54		Narrowleaf Milkweed	Asclepias fascicularis	P	1.5'	M	FS	Not showy; tolerates clay; host to Monarchs
55		Virgin's Bower	Clematis ligusticifolia	P	30'	L/M	PS/SH	vine; showy white flowers; summer deciduous; part shade to shade
56		Hooker's Evening Primrose	Oenothera elata	P	5'	M-H	FS/PS	Wetland-riparian but still drought tolerant; reseeds aggressively
57		California Fuchsia	Epilobium canum	P	3'	L	FS	Hummingbird favorite; spreads; cut back in winter
58		Gumplant	Grindelia camporum	P	4'	L	FS	Tolerates most soils; can be cut back in winter
59		Snowberry	Symphoricarpos albus	P	6'	L	PS/SH	Moist shady areas; winter deciduous; spreads by rhizomes
60		Slender Woolly Buckwheat	Eriogonum gracile	A	5'	EL/VL	FS/PS	Small annual; tolerates most soils; winter semi-deciduous
61		Common Madia	Madia elegans	A	7'	L	FS/PS	Annual herb; showy yellow flowers; tolerates many soils
62	Late	Common Sunflower	Helianthus annuus	A	5'	M	FS	Tolerates most soils; can get very large
63								
64		California Aster	Symphyotrichum chilense	P	5'	VL/L	FS/PS	Tolerates clay soil; winter deciduous; cut back in winter; aggressive spreader
65		California Goldenrod	Solidago californica	P	3'	VL/M	FS/PS/S	Easy to grow; for late color plant with Epilobium canum; spreader
66		Sulphur Buckwheat	Eriogonum umbellulatum	P	7'	VL/M	FS	Showy yellow flowers; variable plant; evergreen
67		Bee Plant	Scrophularia californica	P	4'	L	PS	Strong bee attractant; tolerates most soils; needs good drainage
68		Coyote Brush	Baccharis pilularis	P	10'	VL/L	FS/PS	Tour easy to grow shrub; variable forms; blooms into winter
69		Rubber Rubberbrush	Ericameria nauseosa	P	9'	L	FS	Needs good drainage; summer/fall bloom
70		Vinegarweed	Trichostema lanceolatum	A	1'	L	FS	Does not do well in seed mixes; sow individually; tolerates dry clay soils

Homegrown Habitat Plant List 2019

	A	B	C	D	E	F	G	H
	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
1	Early	Western Redbud	<i>Cercis occidentalis</i>	P	10'-20'	L	S/PS	Drought-tolerant; also tolerates semi-riparian conditions
2		Red Willow	<i>Salix laevigata</i>	P	30'-50'	H	FS	Wetland-semi riparian; tolerates clay soils; fast grower, semi-deciduous
3		Arroyo Willow	<i>Salix lasiolepis</i>	P	7'-35'	H	FS	Likes marshes/wet areas; spreads by root runners; deciduous
4		Sandbar Willow	<i>Salix exigua</i>	P	10'-23'	H	FS	Constant moisture; spreads by basal shoots to any moisture
5		Valley Oak	<i>Quercus lobata</i>	P	60'-100'	L	FS	Fast growing (20' in 5 years); drought tolerant
6		Scrub Oak	<i>Quercus berberidifolia</i>	P	15'-20'	L	FS/PS	Smaller, drought tolerant, likes medium fast drainage
7		Buck Brush	<i>Ceanothus cuneatus</i>	P	5'-12'	VL	FS	Needs fast drainage; fast to moderate growth, evergreen
8		California Everlasting	<i>Psuedognaphalium californicum</i>	P	3'	VL/L	FS	Semi deciduous, may like some afternoon shade in summer
9		California Blackberry	<i>Rubus ursinus</i>	P	6'	M/H	FS/PS/S	Requires substantial moisture, wide spreading
10		Dutchmans Pipe	<i>Aristolochia californica</i>	P	20'	L/M	S/PS	Deciduous vine, grows in moist woods along streams
11		Baby Blue Eyes	<i>Nemophila menziesii</i>	A	.25'	L	FS/PS	Annual herb
12		Chinese Houses	<i>Collinsia heterophylla</i>	A	.5'	M	S/PS	Annual purple flowering herb, good in containers
13		Lacy Phacelia	<i>Phacelia tanacetifolia</i>	A	3'	VL/L	FS	Tolerates clay soils; good plant for biological pest control
14		Miners Lettuce	<i>Claytonia perfoliata</i>	A	1.3'	L/M	PS	Edible spreading annual herb; in the valley, does best in part shade
15								
16	Early-Mid	Blue Elderberry	<i>Sambucus nigra</i> var. <i>cerulea</i>	P	20'-30'	M	FS	Easy to grow, fast growing deciduous shrub/tree; host plant for endangered Valley Elderberry Longhorn Beetle
17		Interior Live Oak	<i>Quercus wislizenii</i>	P	15'-50'	VL	S/PS	Medium to large evergreen, moderate grower
18		Blue Oak	<i>Quercus douglasii</i>	P	16'-82'	VL	FS/PS	Slow grower deciduous, supports many species
19		Toyon	<i>Heteromeles arbutifolia</i>	P	12'	L	FS/PS	Evergreen shrub easy to grow, white flowers early summer, red berries in fall
20		Shining Willow	<i>Salix lasiandra</i>	P	3'-30'	M/H	FS/PS	Winter deciduous riparian plant, good for restoration projects
21		Mountain Mahogany	<i>Cercocarpus betuloides</i>	P	8'-20'	VL/L	FS/PS	In the valley this plant will do better with PM shade
22		Hollyleaf Redberry	<i>Rhamnus ilicifolia</i>	P	9'	L	PS	PM shade in the valley, siting is critical for success
23		California Broom/Deerweed	<i>Acmispon glaber</i>	P	3'	VL	FS	Not too showy subshrub with high habitat value
24		Skunkbush, Fragrant Sum	<i>Rhus aromatica</i>	P	8'	L	FS/PS	Winter deciduous shrub, may like PM shade in valley
25		Chaparral Honeysuckle	<i>Lonicera interrupta</i> (hispidula)	P		VL/L	FS/PS	Hardy, woody chaparral shrub/vine, summer flowering, edible/bitter berries
26		Silver Bush Lupine	<i>Lupinus albifrons</i>	P	3'	L	FS/PS	Requires good drainage, PM shade in valley
27		Foothill Penstemon	<i>Penstemon heterophyllus</i>	P	5'	L	FS/PS	Perennial evergreen herb. May need pm shade in valley
28		Sonoma Sage	<i>Salvia sonomensis</i>	P	1.3'	VL	PS	Moderately drought tolerant if given part shade
29		Purple Needlegrass	<i>Stipa pulchra</i>	P	3'	VL/L	FS	CA state grass, perennial with deep roots
30		California Poppy	<i>Eschscholzia californica</i>	A	.5'	VL/L	FS	CA State flower, tolerates clay soil, readily reseeds
31		Elegant Clarkia	<i>Clarkia unguiculata</i>	A	.5'	L	FS/PS	Showy pink flowers, reseeds readily
32		Globe Gillia	<i>Gillia capitata</i>	A	1'	L/M	FS	Showy pink to lavender flowers
33		Miniature Lupine	<i>Lupinus bicolor</i>	A	1.3'	L	FS	Showy purple and white flowers, plant with CA poppies
34		Sky Lupine	<i>Lupinus nanus</i>	A	2'	L	FS	Chaparral annual herb
35								