

4.9 – BIOLOGICAL RESOURCES

This biological resources section addresses the biological resources present within the Redevelopment Project Area and includes a discussion of the special-status species that potentially occur within the Project Area as well as sensitive habitats in the Project Area. This section also identifies potential plan-specific and cumulative impacts to these resources due to implementation of the proposed project.

4.9.1 EXISTING SETTING

The following information is based largely on the Biological Resources Report (2005), prepared by Ecosystem Sciences for the proposed City of Rancho Cordova General Plan. This report relied on literature reviews and database searches of both the California Natural Diversity Database (CNDDDB) and information from the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Vascular Plants of California as well as information drawn from the draft South Sacramento Habitat Conservation Plan (SSHCCP). Site visits were conducted by Ecosystem Sciences as well as consultation with responsible agencies.

REGIONAL SETTING

Sacramento County lies in the middle of the Central Valley and is bordered by Contra Costa County and San Joaquin Counties on the south, Amador County and El Dorado County on the east, Placer County and Sutter County on the north, and Yolo County and Solano County on the west. Sacramento County extends from the low delta between the Sacramento and San Joaquin rivers northward to the foothills of the Sierra Nevada Mountains with plant communities ranging from cropland and grassland to woodlands and savanna (Ecosystem Sciences, 2005).

LOCAL SETTING

The Project Area is approximately 2,578 acres in size and is located entirely within the incorporated boundaries of the City of Rancho Cordova. The Project Area is generally bounded by the American River to the north, Bradshaw Road to the west, International Boulevard to the south, and Sunrise Boulevard to the east. See Section 3.0 of this EIR for a detailed depiction of the Project Area boundaries. The topography within the Project Area includes gently rolling terrain, such as that found in the eastern Great Central Valley – interrupted and generally level developed land. The Project Area is primarily comprised of developed land with some small open areas.

PLANT COMMUNITIES AND WILDLIFE HABITATS

The following information is taken from the 2005 Biological Resources Report. The Biological Resources Report utilized data from both the Draft South Sacramento Habitat Conservation Plan and the California Wildlife Relationships System (Ecosystem Sciences, 2005). Cover types constitute categories of typical land covers and in some cases the uses of those areas such as aqueducts and roads. Specific wildlife habitats are created by these cover types. Wildlife habitats provide cover, food, and water, which is necessary in order to support a particular animal species or groups of species. Changes in these habitats, both significant and minor, can impact a species' abundance, distribution, and diversity as well as interactions between different species. See **Table 4.9-1** for a listing of the plant communities and wildlife habitats found in the Project Area. The location of the cover types shown in **Table 4.9-1** is depicted on **Figure 4.9-1**.

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TABLE 4.9-1
COVER TYPES IN THE REDEVELOPMENT PROJECT AREA BY TOTAL ACRES

Cover Type	Acres	Percent of Total
High Density Development	1845.14	98.9%
Grassland	11.81	0.6%
Open Water (Lakes and Rivers)	8.08	0.4%
Total	1865.03	100%

Source: *Rancho Cordova Biological Resources Report – Generated from GIS Land Cover Data from the Draft Sacramento County South Sacramento Habitat Conservation Plan.*

Note: Total Acres does not include roads.

In addition to sensitive cover types within the Project Area, several special-status animal species occur within these cover types and are found within the Project Area and within one mile of the Project Area. For more information on special-status species see section 4.9.2, Regulatory Framework, below. **Table 4.9-2**, provided in the Regulatory Framework section below, lists these special status species and identifies which cover types they are associated with.

The following discussion describes the biological communities and habitats (cover types) that exist within the Project Area. Included in the discussion of each cover type is a description of the community or habitat, any pertinent information on the animal species found within the cover type, and information on plant species found within each cover type, where applicable.

High Density Development

The high density development cover type consists of previously developed land that is “highly constructed, intensely managed, and comprised of mainly ornamental exotic plants” (Ecosystem Sciences, 2005, p. 30). Exotic ornamental plants can be a concern as they may spread from managed, landscaped areas into adjacent wildlands.

Some special-status species are found in this cover type and have the potential to occur within the Project Area, specifically Sanford's Arrowhead and Cooper's hawk. Other species commonly found within this cover type include birds such as the rock pigeon, house sparrow, and starling. Some small mammals can be found in this cover type, including raccoon, opossum, and striped skunk – though these are more likely to be found in less dense urban portions of the Project Area.

Grassland

The grassland cover type is found in the northwestern edge of the Project Area, in the vicinity of Hagan Park and within the American River Parkway Plan area. The grassland cover type is characterized by open space generally dominated by non-native annual grasses such as foxtail fescue, wild barley, red brome, ripgut brome, and wild oats. Plant species found in the grassland cover type were once native grasses, but introduced annual grasses have replaced the native species. The non-native annuals that now dominate this cover type are considered naturalized and thus prevent native perennials from re-establishing themselves in the area.

The grassland cover type supports several animal species by providing food plants and, to some extent, habitat for breeding, resting, and cover – though generally only in grassland that includes features such as cliffs, ponds, woody plants, or streams. Animal species found in the grassland cover type within the Project Area include coyote, badger, Swainson's hawk, and

smaller mammals such as mice and voles. Swainson's hawk is classified as Threatened by the CDFG and is therefore considered a special-status species.

Open Water

The open water cover type is characterized by large areas of permanently flooded land including rivers and lakes. The only open water located within the Project Area is a small portion of the American River. Open water supports aquatic plants both on the surface of the water and along the edges of water bodies and, in turn, provides food for insects and wildlife. Algae and plankton populations are also supported by open water, therefore providing food for fish and invertebrates. Over 100 species of birds and 13 mammal species are known to utilize this cover type within the Project Area, including bank swallow and north-western pond turtle. See **Table 4.9-2** for a complete listing of special status species found in this cover type.

4.9.2 REGULATORY FRAMEWORK

The following section describes the Federal, State, and local environmental laws, policies, plans, and agencies that are relevant to biological resources in the proposed Redevelopment Plan and the Project Area. Where available, specific policies are identified.

FEDERAL

Federal Endangered Species Act

The United States Congress passed the federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. The FESA is intended to operate in conjunction with the National Environmental Policy Act (NEPA) to help protect the ecosystems upon which endangered and threatened species depend.

The FESA prohibits the "take" of endangered or threatened wildlife species. "Take" is defined as harassing, harming (including significantly modifying or degrading habitat), pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (16 USC 1532, 50 CFR 17.3). Actions that result in take can result in civil or criminal penalties.

The FESA and U. S. Army Corps of Engineers (USACE) Section 404 guidelines prohibit the issuance of wetland permits for projects that would result in the take of a threatened or endangered wildlife or plant species. The U.S. Army Corps of Engineers must consult with the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS) when threatened or endangered species may be affected by a proposed project in order to determine whether issuance of a Section 404 permit would result in the take of a listed species. In the context of the Project Area, FESA would be triggered if development resulted in take of a threatened or endangered species or if issuance of a Section 404 permit or other federal agency action could result in the take of a threatened or endangered species.

Clean Water Act

The U.S. Army Corps of Engineers (USACE) regulates discharge of dredged or fill material into waters of the United States under Section 404 of the Clean Water Act (CWA). "Discharges of fill material" are defined as the addition of fill material into waters of the U.S., including, but not limited to the following: placement of fill that is necessary for the construction of any structure, or impoundment requiring rock, sand, dirt, or other material for its construction; site-development

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fills for recreational, industrial, commercial, residential, and other uses; causeways or road fills; fill for intake and outfall pipes and subaqueous utility lines [33 C.F.R. Section 328.2(f)]. In addition, Section 401 of the CWA (33 U.S.C. 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain certification that the discharge will comply with the applicable effluent limitations and water quality standards.

Jurisdictional Waters of the U.S.

Jurisdictional waters of the U.S. include jurisdictional wetlands as well as other waters of the U.S. such as creeks, ponds, and intermittent drainages. Wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" [33 C.F.R. §328.3(b)]. Presently, to be considered a wetland, a site must exhibit three criteria: hydrophytic vegetation, hydric soils, and wetland hydrology existing under the "normal circumstances" for the site. Furthermore, Jurisdictional Waters of the U.S. can be defined by exhibiting a defined bed and bank and ordinary high water mark.

The lateral extent of non-tidal waters is determined by delineating the ordinary high water mark (OHWM) [33 C.F.R. §328.4(c)(1)]. The OHWM is defined by the Corps as "that line on shore established by the fluctuations of water and indicated by physical character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas" [33 C.F.R. §328.3(e)].

Potential jurisdictional waters of the U.S. in the City of Rancho Cordova and in the Project Area include ponds, intermittent and perennial creeks, irrigation ditches, and the river. Roadside ditches are the primary form of jurisdictional waters found within the Project Area. Roadside ditches are considered to be ephemeral in nature. Ephemeral drainage typically functions for the collection and transport of stormwater, conveying flows during and immediately after storm events to other water bodies such as Morrison Creek and Laguna Creek. Wetland vegetation occurs intermittently in this drainage where slower flows and seasonal water availability is present. Depressional areas occur within the reach of the drainage where water pools and remains after the primary channel is dried. The American River is also located within a portion of the Project Area. The American River consists of jurisdictional waters as well.

Other categories of jurisdictional waters include vernal pools, depressional seasonal wetlands, and depressional seasonal wetlands. None of these three types of wetlands are known to exist within the Project Area. However, they are found within the vicinity of and adjacent to the Project Area.

Vernal Pools

The term vernal pool has been used to describe a variety of features. For the purposes of this document, the term vernal pool refers to seasonally inundated shallow depressions underlain by an impermeable layer of soil, generally hardpan or bedrock, and provides a specialized habitat for plant species adapted to this environment. Native annual herbs and grasses are the dominant species in vernal pool communities. The pools are inundated with water for various periods of times depending on the depression depth, extent and duration of rainfall, and ambient temperatures. Surface flow from the surrounding upland habitat (annual grassland) provides a primary source of hydrology of these systems. Vernal pools are found south of the

Project Area, in the vicinity of Mather Airport. No known vernal pools exist within the Project Area.

Depressional Seasonal Wetlands

Depressional seasonal wetlands are seasonal wetlands where saturation rather than inundation is the dominant hydrologic regime. These wetlands support vegetation that is adapted to long-term saturation rather than inundation (non vernal pool vegetation). Annual grasses and herbs dominate the seasonal wetland communities. These wetlands, though not supporting a dominance of vernal pool associated plants, are habitat for federally listed vernal pool fairy shrimp, vernal pool tadpole shrimp, and western spadefoot toad. Depressional seasonal wetlands may also support common wildlife species similar to those that inhabit vernal pools.

Riverine Seasonal Wetlands (Seasonal Swales)

Riverine seasonal wetlands are linear features which collect and carry seasonal surface flow to receiving aquatic water bodies. The flows in these features do not achieve the energy necessary to create a defined bed and ordinary high water mark and therefore are not considered drainages. These features remain saturated or inundated for prolonged periods of time sufficient to support wetland vegetation.

Migratory Bird Treaty Act

Raptors (birds of prey), migratory birds, and other avian species are protected by a number of State and federal laws. The federal Migratory Bird Treaty Act (MBTA) prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior. Section 3503.5 of the California Fish and Game Code states that it is "unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto."

STATE

California Endangered Species Act

The State of California enacted the California Endangered Species Act (CESA) in 1984. The CESA is similar to the FESA but pertains to State-listed endangered and threatened species. It directs agencies to consult with CDFG on projects or actions that could affect listed species, directs CDFG to determine whether jeopardy would occur, and allows CDFG to identify "reasonable and prudent alternatives" to the project consistent with conserving the species.

The CESA prohibits the taking of State-listed endangered or threatened plant and wildlife species. CDFG exercises authority over mitigation projects involving State-listed species, including those resulting from CEQA mitigation requirements. CDFG may authorize taking if an approved habitat management plan or management agreement that avoids or compensates for possible jeopardy is implemented. CDFG requires preparation of biological mitigation plans in accordance with published guidelines.

California Native Plant Society

The California Native Plant Society (CNPS) maintains a list of plant species native to California that are found in low numbers, limited distribution, or are otherwise threatened with extinction.

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This information is published in the Inventory of Rare and Endangered Vascular Plants of California. The following identifies the definitions of the CNPS listings:

- List 1A: Plants Believed Extinct.
- List 1B: Plants Rare, Threatened, or Endangered in California and elsewhere.
- List 2: Plants Rare, Threatened, or Endangered in California, but more numerous elsewhere.
- List 3: Plants About Which We Need More Information - A Review List.
- List 4: Plants of Limited Distribution - A Watch List.

For the purposes of the analysis in this EIR, plant species listed by CNPS as 1B are considered to be special status species.

FEDERAL AND STATE - SPECIAL STATUS SPECIES

The USFWS and the CDFG maintain a list of species that warrant special attention due to their respective rarity as well as the condition and availability of habitat suitable for those species. Both agencies have regulatory authority over these public resources and maintain lists that group species in one of five categories:

- *Species of Concern (USFWS) or Species of Special Concern (CDFG)* – This is an informal category that describes species for which information is available that the species may require conservation actions and that it may be a candidate for listing. Species of Concern, however, are not legally protected under the Endangered Species Act and may not require listing.
- *Candidate* – Sufficient information indicates that the poor quantity or condition of the species or habitat utilized by the species qualifies them for listing with the USFWS and the CDFG, but they are not officially assigned a category and listed.
- *Proposed* – This category describes candidate species for which the formal process has begun in order to add them to the list, but formal listing has not yet occurred.
- *Threatened* – This is a formal listing category used by both the USFWS and the CDFG to identify species that are likely to become endangered within the foreseeable future.
- *Endangered* – This is the formal listing category given to species for which information indicates they could potentially become extinct within the foreseeable future. This is the highest level of listing and denotes the highest level of protection under the law.

For the purposes of the analysis in this EIR, special status species also include species that are not included on USFWS and CDFG lists, but for which information is available that the species are rare, threatened, or endangered in the Sacramento County area. For the purposes of this document, the term “special status species” refers to species that are:

- Legally protected or proposed for protection under the California Endangered Species Act or the Federal Endangered Species Act (any species in the above categories);

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- Defined as endangered or rare under the California Environmental Quality Act (State CEQA Guidelines, Section 15380);
- Designated as a species of concern by the USFWS or the CDFG;
- Animal species listed as “fully protected” in the Fish and Game Code of California (Sections 3511, 4700, 5050, 5515); and/or,
- Plant species listed in the California Native Plant Society's *Inventory of Rare and Endangered Vascular Plants of California* (2001).
- Plant or animal species that have been designated locally (by a city or county) as important through an ordinance (e.g., tree protection ordinance) or policy.

Several special status species are found within and around the Redevelopment Project Area. **Table 4.9-2**, below, identifies each of those species, as well as their ranking in the CNDDDB database, classification by other species lists, their State and Federal listing status (if any), and the cover types that these species are commonly associated with. The only special status species known to occur within the Project Area are the Sanford's arrowhead and the Valley Elderberry Longhorn Beetle. However, several additional special status species were found within one mile of the Project Area and other special status species are known to exist in the same cover types, though elsewhere in the general vicinity and outside one mile from the Project Area.

**TABLE 4.9-2
POTENTIAL SPECIAL STATUS SPECIES IN THE PROJECT AREA**

Scientific name	Common Name	CNDDDB Ranks	Other Lists	State Status	Federal Status	Associated Cover-types	Found Within One Mile
Plant Species							
<i>Juncus leiospermus</i>	Ahart's dwarf rush	G2T1, S1.2	CNPS: 1B R-E-D: 3-2-3	None	None	Grassland	No
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	G3, S3.2	CNPS: 1B R-E-D: 2-2-3	None	None	High Density Development	Yes ¹
Amphibian Species							
<i>Spea (Scaphiopus) hammondii</i>	Western spadefoot toad	G3, S3	CDFG: CSC BLM: Sensitive	None	None	Grassland	No
Bird Species							
<i>Accipiter cooperii</i>	Cooper's hawk	G5, S3	CDFG: CSC	None	None	Grassland, High Density Development	Yes
<i>Agelaius tricolor</i>	Tricolored blackbird	G2G3, S2	CDFG: CSC	None	None	Grassland	Yes
<i>Ardea alba</i>	Great egret	G5, S4	CDF: Sensitive	None	None	Grassland	Yes

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Scientific name	Common Name	CNDDDB Ranks	Other Lists	State Status	Federal Status	Associated Cover-types	Found Within One Mile
Ardea herodias	Great blue heron	G5, S4	CDF: Sensitive	None	None	Grassland	Yes
Asio flammeus (nesting)	Short-eared Owl	G5, S3	CDFG: CSC USBC: Watch list Audubon: Watch list	None	None	Grassland	No
Athene cunicularia (burrow sites)	Burrowing owl	G4, S2	CDFG: CSC FWS: BCC BLM: Sensitive	None	None	Grassland	Yes
Buteo swainsoni	Swainson's hawk	G5, S2	Audubon: Watch list FWS: BCC FS: Sensitive USBC: Watch list	Threatened	None	Grassland	No
Circus cyaneus (nesting)	Northern harrier	G5, S3	CDFG: CSC	None	None	Grassland	No
Elanus leucurus	White-tailed kite	G5, S3	FWS: MNBMC CDFG: Fully Protected	None	None	Grassland	Yes
Eremophila alpestris actia	California horned lark	G5T3, S3	CDFG: CSC	None	None	Grassland	No
Lanius ludovicianus (nesting)	Loggerhead shrike	G4, S4	CDFG: CSC FWS: BCC	None	None	Grassland	No
Riparia riparia	Bank swallow	G5, S2S3		Threatened	None	Open Water	Yes
Invertebrate Species							
Desmocerus californicus dimorphus	Valley elderberry longhorn beetle	G3T2, S2		None	Threatened	Grassland	Yes ¹
Lepidurus packardi	Vernal pool tadpole shrimp	G3, S2S3	IUCN: VU/A2c	None	Endangered	Vernal Pool	Yes
Linderiella occidentalis	California linderiella (fairy shrimp)	G3, S2S3	IUCN: LRnt	None	Endangered	Vernal Pool	Yes

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Scientific name	Common Name	CNDDB Ranks	Other Lists	State Status	Federal Status	Associated Cover-types	Found Within One Mile
Mammal Species							
Antrozous pallidus	Pallid bat	G5, S3	CDFG: CSC FS: Sensitive BLM: Sensitive WBWG: High priority	None	None	Grassland	No
Taxidea taxus	American badger	G5, S4	CDFG: CSC	None	None	Grassland	No
Reptile Species							
Emys (= Clemmys) marmorata marmorata	North-western pond turtle	G3G4T 3, S3	CDFG: CSC FS: Sensitive	None	None	Open Water	Yes
Key to Ranks and Lists							
CNDDB Ranks:							
G	Global rank indicator; denotes rank based on rangewide status.						
T	Trinomial rank indicator; denotes global status of infraspecific taxa.						
S	State rank indicator; denotes rank based on status.						
1	Critically imperiled because of extreme rarity or because some factor of its biology makes it especially vulnerable to extinction (typically 5 or fewer occurrences).						
2	Imperiled because of rarity or because other factors demonstrably make it very vulnerable to extinction (typically 6 to 20 occurrences).						
3	Rare or uncommon but not imperiled (typically 21 to 100 occurrences).						
4	Not rare and apparently secure, but with cause for long-term concern (usually more than 100 occurrences).						
5	Demonstrably widespread, abundant, and secure.						
U	Unrankable.						
H	Historical occurrence (formerly part of the native biota; implied expectation that it might be rediscovered or possibly extinct).						
X	Presumed extinct or extirpated.						
Q	Indicates uncertainty about taxonomic status.						
?	Uncertainty exists about the stated rank.						
NR	Not ranked.						
NA	Conservation status rank is not applicable.						
CNPS Lists:							
List 1A: Plants Presumed Extinct in California							
List 1B: Plants Rare, Threatened, or Endangered in California and Elsewhere							
List 2: Plants Rare, Threatened, or Endangered in California, But More Common Elsewhere							
List 3: Plants About Which We Need More Information - A Review List							
List 4: Plants of Limited Distribution - A Watch List							

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CNPS R-E-D Codes:	
R	Rarity
1	Rare, but found in sufficient numbers and distributed widely enough that the potential for extinction is low at this time
2	Distributed in a limited number of occurrences, occasionally more if each occurrence is small
3	Distributed in one to several highly restricted occurrences, or present in such small numbers that it is seldom reported
E	Endangerment
1	Not endangered
2	Endangered in a portion of its range
3	Endangered throughout its range
D	Distribution
1	More or less widespread outside California
2	Rare outside California
3	Endemic to California

Source: *Ecosystem Sciences, March 2005 and California Department of Fish and Game (CDFG). 2004. California Natural Diversity Database. Wildlife & Habitat Data Analysis Branch, Department of Fish and Game (Version: 09 September 2004)*

Note: ¹Sanford's arrowhead (*Sagittaria sanfordii*) and valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) were the only special status species found to occur within the Redevelopment Project Area.

Distribution and Life History of Federal and State Listed Species

This section, based on the Biological Resources Report prepared by Ecosystem Sciences in March 2005, provides general information on the distribution and life history of special status species that are listed by either the USFWS or the CDFG as either Threatened or Endangered. For more information on these species including their CNRDB ranking and the cover types they are associated with, see **Table 4.9-2** above. The location of special status plant and animal species found within the Project Area and within one mile of the Project Area is shown on **Figure 4.9-2**.

Federal and State Listed Bird Species

Swainson's Hawk (*Buteo swainsoni*)

Swainson's hawks nest in large, native trees such as oaks and willows and in nonnative trees as well, primarily in riparian and other wet cover types. Suitable habitat for Swainson's hawks is found in the grassland cover type within the Project Area. This habitat could provide shelter and nesting sights as well as foraging habitat. Swainson's hawk is listed as Threatened by the CDFG. No known occurrences of this species were identified within one mile of the Project Area.

Bank Swallow (*Riparia riparia*)

Bank swallows use cliffs and banks as nesting sites, digging into the cliff side where soft soils are found. Suitable habitat for bank swallows exists in the open water cover type within the Project Area. Bank swallow primarily eat insects in flight and are therefore commonly found in riparian and wetland habitats. The Bank swallow is listed as Threatened by the CDFG and is found in three locations within one mile of the Project Area. However, no known occurrences of this species were identified within the Project Area itself.

Federal and State Listed Invertebrate Species

Valley Elderberry Longhorn Beetle (*Desmocerus californicus ssp. Dimorphus*)

Valley elderberry longhorn beetle (VELB) utilize elderberry plants for food, shelter for eggs, and cover. This species is listed as Threatened by the USFWS. VELB were identified as occurring within the grassland cover type within the Project Area as well as along the American River within one mile of the Project Area. VELB is listed as threatened by the USFWS.

Vernal Pool Tadpole Shrimp (*Lepidurus packardii*)

Vernal pool tadpole shrimp are similar in life history to vernal pool fairy shrimp but differ by morphology and physical characteristics as well as dispersion and numbers within their associated cover types. Vernal pool tadpole shrimp are found in vernal pools as well as ephemeral drainages, seasonal wetlands, clay flats, stock ponds, and ditches. Endemic to California, this species is listed as endangered by the USFWS. Suitable habitat for this species is not found within the Project Area. However, habitat and known occurrences of this species were identified within one mile of the Project Area to the south in vernal pool complexes west of Mather Airport.

California Linderiella (*Linderiella occidentalis*)

California linderiella are also similar to the other species of vernal pool shrimp discussed above. California linderiella inhabit similar habitat to the vernal pool tadpole shrimp, though they show some tolerance for higher temperatures and inhabit clear water pools more readily than the vernal pool fairy shrimp (who are often found in more tea-colored pools). Also endemic to California, California linderiella are listed as Endangered by the USFWS. Just as with vernal pool tadpole shrimp, suitable habitat for this species is not found within the Project Area, though it is known to occur within one mile of the Project Area to the south.

LOCAL

Proposed Rancho Cordova General Plan

The City of Rancho Cordova is in the process of preparing its first General Plan. On May 16, 2005 the City of Rancho Cordova adopted Resolution No. 57-2005 that establishes the City's interim policies and diagrams associated with the development of its new General Plan are to be used to guide land use and circulation within the City until adoption of the General Plan. The proposed General Plan includes provisions related to impacts to biological resources. Section 4.1 of this EIR includes more information on the proposed Rancho Cordova General Plan.

American River Parkway Plan

The American River Parkway Plan was adopted by Sacramento County in 1985. The vision of the Plan was to manage the Parkway's natural resources; accommodate the demand for passive, unstructured, river oriented recreational pursuits in a natural environment which are not normally provided by other County recreational facilities, in a manner which minimizes the impact on the environment; limit the use of the Parkway to prevent overuse and preserve environmental quality thereby ensuring the availability of the Parkway for future users; coordinate and cooperate in the Parkway planning and management efforts; and balance the preservation of naturalistic open space and habitat within the urban area with the provision of active recreational facilities to serve the recreational needs of the community. Sacramento County is currently working with

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Update Citizens Advisory Committee (UCAC), and the general public to update the American River Parkway Plan focusing on the downstream portion of the Parkway, including three contiguous sites in a 5.5-mile reach of the lower American River (Discovery Park, Woodlake, and Cal Expo). This area includes approximately 1,000 acres. The Update is required because the context and usage of the three areas has changed considerably since the Plan was adopted in 1985.

Proposed South Sacramento Habitat Conservation Plan

The proposed South Sacramento County Habitat Conservation Plan (SSHCP), which is managed by the Sacramento County Planning and Community Development Department, is an environmental study that seeks strategies that allow commercial, residential, and other development, while balancing the needs of sensitive plant and animal species and the preservation of agricultural operations. The SSHCP is currently being developed in conjunction with several public agencies and other interested stakeholders. The City of Rancho Cordova is a participating agency in the SSHCP, and may ultimately become a permittee under the SSHCP. The geographic scope of the SSHCP includes approximately 340,000 acres in the unincorporated County area bounded by US-50 to the north, the County line to the east and south; excluding the Delta, and Interstate 5 to the west. The SSHCP covers land within the cities of Rancho Cordova, Elk Grove and Galt. Only those portions of the Redevelopment Project Area that are located south of US-50 are within the SSHCP area.

The SSHCP is intended to consolidate environmental efforts to protect and enhance wetlands (primarily vernal pools) and upland habitats to provide ecologically viable conservation areas. The SSHCP will also minimize regulatory hurdles and streamline the development permit process for projects that are consistent with the HCP and engage in the process. The SSHCP will cover 46 species of plants and wildlife, 11 of which are state or federally listed as threatened or endangered. The SSHCP will be an agreement between state/federal wildlife and wetland regulators (e.g., USFWS and the USACE) and the County to allow land owners to engage in "incidental take" of listed species (i.e., destruction or degradation of habitat in connection with economic based activities) in return for conservation commitments from the County. Funding for the SSHCP is expected to come from a per-acre fee levied on new developments to mitigate associated habitat impacts.

An adaptive management program will be implemented in conjunction with the SSHCP so that mitigation measures that do not meet their goals or are not applicable to an individual can be modified to address project- and site-specific environmental impacts. The critical future steps to be taken in completion of the SSHCP include the: completion of species account documents; preparation of habitat account; and completion of draft chapters (land use, physical resources, biological resources, and cultural resources). The County is making progress towards the goal of acquiring a Clean Water Act Section 404 permit. The County will collaborate with five other counties in the region to lobby Congress for appropriations.

4.9.3 PROJECT IMPACTS AND MITIGATION MEASURES

METHODOLOGY

Preliminary Investigation/Document Review

Information on Biological Resources within the Project Area was collected from the Biological Resources Report prepared by Ecosystem Sciences for the proposed City of Rancho Cordova General Plan EIR process. The Project Area is located entirely within the City of Rancho

Cordova, therefore the report was determined to be an appropriate source for information used in this analysis.

Preliminary investigation into biological resources for the City of Rancho Cordova was conducted via literature review and document gathering. The purpose of such review was to identify the extent of resources to be analyzed in this document as well as to prepare for field investigations and to identify any data gaps that may exist in the records. A complete list of technical documents and records used is available in the Biological Resources Report prepared by Ecosystem Sciences for the City of Rancho Cordova. The Biological Resources Report is available at City Hall for review. The assembled documents, including any digital data and aerial photos, were studied and interpreted in order to infer site conditions prior to field investigations. Additionally, the following agencies, firms, and individuals were consulted:

- Sacramento County, HCP Steering Committee
- U.S. Army Corps of Engineers, Sacramento District
- ECORP Consulting
- EDAW
- California Native Plant Society
- Dawn Lawson, Local Resident
- Judy and George Waegell, Local Resident

The cover types described and used for this document were based on classifications in the Draft South Sacramento Habitat Conservation Plan in consultation with the Sacramento County HCP Steering Committee.

Field Reconnaissance

Field reconnaissance consisted of biological surveys of several locations throughout the Rancho Cordova area between 2003 and 2005 as a part of planning and CEQA compliance throughout the City of Rancho Cordova. Additional surveys were conducted by staff of Ecosystem Sciences in the preparation of the Biological Resources Report (2005) and were performed in order to characterize existing conditions in the Rancho Cordova Area and to determine the presence of special status species (plants and wildlife) and/or the presence of suitable habitat for such species. In order to identify potential species, the California Natural Diversity Database as well as the CNPS's Inventory of Rare and Endangered Vascular Plants of California were utilized. Consultations with the above agencies, firms, and individuals were used for this purpose as well. Database searches were conducted for the Carmichael and Buffalo Creek quadrangles, in which the Project Area is located, as well as the Rio Linda, Citrus Heights, Folsom, Clarksville, Sacramento East, Folsom Southeast, Florin, Elk Grove, Sloughhouse, and Carbondale quadrangles.

STANDARDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, a biological resource impact is considered significant if implementation of the project would result in any of the following:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFG or USFWS.

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- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFG or USFWS.
- 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, rivers, 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 local 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 local, regional, or state habitat conservation plan.
- Although listed species are protected by specific federal and state statutes, the California Environmental Quality Act (CEQA) Guidelines Section 15380(b) provides that a species not listed on the federal or state list of protected species may be considered rare or endangered if the species can be shown to meet certain specified criteria.

Additionally, according to the Mandatory Findings of Significance [CEQA Guidelines Section 15065(a)], an impact is considered significant if implementation of the project would:

- Substantially degrade the quality of the environment, substantially reduce the habitat of a fish and wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species.

An evaluation of whether or not an impact on biological resources would be substantial must consider both the resource itself and how that resource fits into a regional or local context. Substantial impacts would be those that would diminish, or result in the loss of, an important biological resource, or those that would obviously conflict with local, state, or federal resource conservation plans, goals, or regulations. Impacts are sometimes locally important, but not significant according to CEQA. The reason for this is that although the impacts would result in an adverse alteration of existing conditions, they would not substantially diminish, or result in the permanent loss of, an important resource on a population-wide or region-wide basis.

PROJECT IMPACTS AND MITIGATION MEASURES

Impacts to Endangered, Threatened, and Other Listed Species

- Impact 4.9.1** Implementation of the proposed project could result in direct and indirect loss of habitat and individuals of endangered, threatened, proposed, and candidate status as well as plant species identified by the California Native Plant Society with a rating of CNPS1B. This would be a **significant** impact.

Direct Impacts of the Redevelopment Plan

Suitable habitat for plant and animal species listed as Endangered, Threatened, Proposed, Candidate, Species of Concern, or CNPS1B is found within the Project Area. Redevelopment initiated as a result of implementation of the proposed project could result in direct impacts to such habitat.

Two listed species are known to exist within the Project Area – Sanford's arrowhead (*Sagittaria sanfordii*) and valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*). Sanford's arrowhead is found in two locations within the Project Area within the high density development cover type. Valley elderberry longhorn beetle is found along the American River in the northwestern portion of the Project Area. Sanford's arrowhead is commonly found in drainage features, both man-made and natural, throughout the high density development cover type. The location of these two listed species is shown in **Figure 4.9-3**. Valley elderberry longhorn beetle is only found within those portions of the Project Area that lie within the American River Parkway Plan and are therefore protected from redevelopment activities. As properties are redeveloped and as capital infrastructure is updated to meet the demand of larger numbers of residents and employees in the Project Area, potentially significant impacts could occur to Sanford's arrowhead.

Suitable habitat exists in the Project Area for two additional listed species – Ahart's dwarf rush (*Juncus leiospermus*) and Bank Swallow (*Riparia riparia*). While suitable habitat for Ahart's dwarf rush exists within the Project Area, no occurrences of the species were found within the Project Area or within one mile of the area during preparation of the Biological Resources Report and in subsequent searches of the CNDDDB. Conversely, bank swallow was found to occur within one mile of the Project Area to the north, along the American River. However, no occurrences of bank swallow were located within the Project Area itself.

Indirect Impacts of the Redevelopment Plan

Indirect impacts occur primarily due to increased human/wildlife interactions, habitat fragmentation, encroachment by exotic weeds, and changes in surface water flows. Substantial indirect impacts generally occur as a result of development of previously undisturbed land and open space. Virtually all of the Project Area is already developed. Therefore, any future redevelopment activities would not create any substantial new indirect impacts to listed species.

Mitigation Measures

The following mitigation measures will be adopted by the City Council in connection with the adoption of the Redevelopment Plan as measures that will apply to all development in the Project Area until the proposed General Plan is adopted:

- MM 4.9.1a** The Agency shall require a biological resources evaluation for private and public development projects in areas identified to contain or possibly contain listed plant and/or wildlife species based upon the City's biological resource mapping provided in the General Plan EIR or other technical materials. This evaluation shall be conducted prior to the authorization of any ground disturbance.
- MM 4.9.1b** For those areas in which special status species are found or likely to occur or where the presence of species can be reasonably inferred, the Agency shall

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require mitigation of impacts to those species. Mitigation shall be designed by the Agency in coordination with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG), and shall emphasize a multi-species approach to the maximum extent feasible. This may include development or participation in a habitat conservation plan.

Implementation of the above mitigation would ensure that the proposed project would have **less than significant** direct and indirect impacts on listed species.

Impacts to Species of Concern and Other Non-Listed Special Status Species

Impact 4.9.2 Implementation of the proposed project could result in a direct or indirect loss of habitat and individuals of animal and plant species of concern and other non-listed special status species. This would be a **significant** impact.

Direct Impacts of the Redevelopment Plan

According to the literature search and site examinations performed as part of the Biological Resources Report for the City of Rancho Cordova, as well as a later CNDDDB search performed by the City, no non-listed special status species are known to occur within the Project Area. However, suitable habitat exists within the Project Area for several such species. These species and their associated cover types within the Project Area are identified in **Table 4.9-3**. For the locations of any of these species found within one mile of the Project Area, see **Figure 4.9-3**.

**TABLE 4.9-3
NON-LISTED, SPECIAL STATUS SPECIES HABITAT WITHIN THE PROJECT AREA**

Scientific Name	Common Name	Associated Cover Types	Found Within One Mile
<i>Spea hammondi</i>	Western spadefoot toad	Grassland	No
<i>Accipiter cooperii</i>	Cooper's hawk	Grassland High Density Development	Yes
<i>Agelaius tricolor</i>	Tricolored blackbird	Grassland	Yes
<i>Ardea alba</i>	Great egret	Grassland	Yes
<i>Ardea herodias</i>	Great blue heron	Grassland	Yes
<i>Asio flammeus</i>	Short-eared Owl	Grassland	No
<i>Athene cunicularia</i>	Burrowing owl	Grassland	Yes
<i>Circus cyaneus</i>	Northern harrier	Grassland	No
<i>Elanus leucurus</i>	White-tailed kite	Grassland	Yes
<i>Eremophila alpestris actia</i>	California horned lark	Grassland	No
<i>Lanius ludovicianus</i>	Loggerhead shrike	Grassland	No
<i>Antrozous pallidus</i>	Pallid bat	Grassland	No
<i>Taxidea taxus</i>	American badger	Grassland	No
<i>Emys marmorata marmorata</i>	Northwestern pond turtle	Open Water	Yes

Source: *Biological Resources Report, Ecosystem Sciences, 2005 and CNDDDB Data, November 2005.*

Of the three cover types found within the Project Area, only the grassland and open water cover types constitute undeveloped land and provide potential habitat for all of the species listed in **Table 4.9-3** (except for Cooper's hawk). However, both cover types are located within the American River Parkway Plan area and are therefore protected from development by policies within that plan. Cooper's hawk is known to inhabit the high density development cover

type, though no occurrences of the species were found within the Project Area. One occurrence of Cooper's hawk was found within one mile of the Project Area. Therefore, it is conceivable that future redevelopment activities within the Project Area could directly impact this species. Additionally, Cooper's hawks require trees for nesting. Any direct impacts to trees within the Project Area could potentially reduce habitat and possible nesting sites for the species.

Suitable habitat for 13 non-listed special status species occurs within the grassland and open water cover types within the Project Area. However, as both cover types are located within the American River Parkway Plan area, and are therefore precluded from development pursuant to County Policy for the Parkway, no impact to these species could occur as a result of implementation of the proposed project. Habitat for Cooper's hawk also exists within the Project Area and one occurrence of Cooper's hawk was identified within one mile of the Project Area. Cooper's hawks nest in trees along riparian areas – including urban trees within the vicinity of the American River. Such trees exist within the Project Area and could potentially be removed as part of future redevelopment activities.

Indirect Impacts of the Redevelopment Plan

Indirect impacts to non-listed special status species are identical in quantity and quality as to those identified for listed species in **Impact 4.9.1** above. Just as with listed species, substantial indirect impacts to non-listed, special status species would not occur as the Project Area is currently developed and any indirect impacts have occurred prior to the proposed project. Indirect impacts to non-listed special status species would be less than significant.

Mitigation Measures

Implement mitigation measures **MM 4.9.1a and b**.

Implementation of the above mitigation would ensure that direct and indirect impacts to non-listed special status species would be **less than significant**.

Loss of Habitat for Bird Species

Impact 4.9.3 Implementation of the proposed project could result in the loss of nesting habitat for non-special status raptors, migratory birds, and other species of nesting birds. This would be a **significant** impact.

The aquatic features located in the open water cover type within the Project Area provide suitable foraging habitat for non-special status bird species found within the Project Area and provide habitat for a variety of shore birds, waterfowl, and migratory passerines. Additionally, grassland areas in the Project Area provide habitat for other local, non-special status species. Suitable nesting habitat for these species within the Project Area is only found within the American River Parkway. The American River Parkway Plan prohibits development of these areas. Therefore, impacts to these species would be less than significant.

Resident species of nesting birds utilize nesting habitat provided by urban trees within the developed portion of the Project Area (within the high density cover type). The Redevelopment Plan does not propose any specific redevelopment activities at this time that would remove urban trees. However, funds provided by the Redevelopment Plan would result in future redevelopment activities that could include the removal of such trees. If these trees were removed during the nesting season, significant impacts could occur to these bird species.

4.9 BIOLOGICAL RESOURCES

Mitigation Measures

The following mitigation measures will be adopted by the City Council in connection with the adoption of the Redevelopment Plan as measures that will apply to all development in the Project Area until the proposed General Plan is adopted:

MM 4.9.3a Prior to the approval of any public or private development project in areas identified or assumed to contain trees, the Agency shall require that a determinate survey of trees species and size be performed. If any native oaks or other native trees six inches or more in diameter at breast height (dbh), multitrunk native oaks or native trees of 10 inches or greater dbh, or non-native trees of 18 inches or greater dbh that have been determined by a certified arborist to be in good health are found to occur, such trees shall be avoided if feasible. If such trees cannot be avoided, the project applicant shall do one of the following:

- All such trees shall be replaced at an inch-for-inch ratio. A replacement tree planting plan shall be prepared by a certified arborist or licensed landscape architect and shall be submitted to the City of Rancho Cordova for approval prior to removal of trees.

-or-

- The project applicant shall submit a mitigation plan that provides for complete mitigation of the removal of such trees in coordination with the City of Rancho Cordova. The mitigation plan shall be subject to the approval of the City.

If the City of Ranch Cordova adopts a tree preservation ordinance at any time in the future, any redevelopment activities shall be subject to that ordinance instead.

MM 4.9.3b Prior to the approval of any public or private development project in areas containing trees, the Agency shall require that a determinate survey be conducted during the nesting season (March 1 and August 31) to identify if active bird nesting is taking place. If all site disturbance is to occur outside this time, the actions described in this mitigation measure are not required. If nesting activity is observed, consultation with the City of Rancho Cordova Planning Department shall be conducted in order to determine the appropriate mitigation, if any, required to minimize impacts to nesting birds. No activity may occur within 50 feet of any nesting activity or as otherwise required following consultation with the California Department of Fish and Game.

Implementation of the above mitigation would ensure that the proposed project would have a **less than significant** impact due to loss of habitat.

Direct and Indirect Impacts to Jurisdictional Waters

Impact 4.9.4 Implementation of the proposed project would result in impacts to and the potential loss of jurisdictional waters of the U.S. This would result in a **potentially significant** impact.

Jurisdictional waters of the U.S. provide for a variety of functions for plants and wildlife within the vicinity of the Project Area. Jurisdictional waters provide habitat, foraging, cover, migration and movement corridors, and water sources for both special-status and other species found in the Project Area. In addition to habitat functions, jurisdictional waters provide physical conveyance of surface water flows as well as channels for the handling of large stormwater events. Large storms can produce extreme flows that cause bank cutting and sedimentation of ephemeral drainage and water bodies such as open water and streams in the Project Area. Jurisdictional waters can slow these flows and lessen the effects of these large storm events, protecting habitat and other resources. Jurisdictional waters found within the Project Area include the American River and various small drainages and ditches located within the high-density development in the area.

Direct impacts to jurisdictional waters occurring within the open water and grassland cover types could not occur due to the fact that those areas are within the American River Parkway Plan and, therefore, could not be redeveloped as a result of implementation of the proposed project. However, direct and indirect impacts to functions and biological values of jurisdictional waters could potentially occur as a result of future redevelopment activities within the high-density development cover type. Potential impacts within the Project Area include discharge of stormwater or fill materials into jurisdictional wetlands. Additional impacts could occur as roadways are improved within the Project Area. Widening and improvement of roadways can cause the realignment of stormwater conveyance infrastructure along those roads, including jurisdictional ditches.

Mitigation Measures

The following mitigation measures will be adopted by the City Council in connection with the adoption of the Redevelopment Plan as measures that will apply to all development in the Project Area until the proposed General Plan is adopted:

MM 4.9.4a Prior to the approval of any public or private development project, the Agency shall insure that there is no net loss of wetlands (including vernal pools and other wetland habitats) prior to development of land areas that contain wetland features. The Agency shall require that wetland features be delineated and identify those features that are "waters of the U.S.". A mitigation plan shall be developed that demonstrates how the "no net loss" standard will be achieved.

MM 4.9.4b Prior to the approval of any public or private development project, the Agency shall ensure that direct and indirect effects to wetland habitats are minimized through the promotion of environmentally sensitive project siting and design, to the maximum extent practicable.

Implementation of the above mitigation measures would reduce this impact to **less than significant**.

Effects on Wildlife Movement Corridors

Impact 4.9.5 Implementation of the proposed project would not interfere with the movement of several species of special concern. This would cause **no impact**.

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Movement corridors within the vicinity of the City of Rancho Cordova are primarily made up of three features: streams and rivers that provide movement of aquatic species as well as forage and shelter for migrating bird species; ephemeral drainages that are key for the spread and movement of vernal pool and other aquatic habitat invertebrates and animals as well as migrating birds; and large, interconnected open space areas that allow terrestrial animal species an uninterrupted avenue for mating, range expansion, and movement. Only one such feature is found near the Project Area – the open water cover type found along the American River in the northwest of the Project Area. The river only makes up 8.08 acres of space, less than 0.4 percent of the total area within the Project Area and no development activities are proposed for this area in the Redevelopment Plan or the proposed City of Rancho Cordova General Plan. No other significant features exist within the Project Area that would provide movement corridors for animal or plant species. Therefore, the proposed project would have **no impact** on wildlife movement corridors.

Mitigation Measures

None required.

Conflict with Adopted Federal and State Conservation and Recovery Plans

Impact 4.9.6 Implementation of the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any adopted biological resources recovery or conservation plan of any Federal or State agency. This would result in **no impact**.

Currently there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, nor any other conservation or recovery plan in effect for the Project Area, in whole or in part. However, Sacramento County is currently preparing the South Sacramento Habitat Conservation Plan (SSHCP) that will include the Project Area in its scope. The City of Rancho Cordova is participating in the development of this plan. While the City has been cooperating in the preparation of the South Sacramento Habitat Conservation Plan, it is unknown if the City will adopt the Plan and require compliance with the SSHCP requirements. The SSHCP does not include those portions of the Project Area that exist north of US-50. Those portions of the Project Area that are located within the SSHCP area do not contain any habitat identified in the SSHCP as being of a significant habitat value. Therefore, the proposed project would have **no impact** on any currently adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other conservation or recovery plan.

Mitigation Measures

None Required.

4.9.4 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

CUMULATIVE SETTING

With the exception of impacts to movement corridors, the cumulative setting used for the following analysis included the Project Area and the City of Rancho Cordova General Plan Planning Area; which is generally bounded by Watt Avenue to the west, State Route 16 to the south, Grant Line Road to the east, and the American River to the North. Impacts to movement corridors were considered for the wider area encompassing adjacent cities, including the City of Folsom, the City of Sacramento, and the City of Elk Grove. As movement corridors concern both

local animal species and migratory species, a larger cumulative area was necessary. Both CNDDDB data as well as data from the South Sacramento Habitat Conservation Plan Steering Committee was used in this analysis to determine if implementation of the proposed project would have a cumulatively considerable incremental impact on the cumulative setting.

CUMULATIVE IMPACTS AND MITIGATION MEASURES

Cumulative Biological Resources

Impact 4.9.7 Implementation of the proposed project, together with past, present, and probable future projects in the area, could result in a cumulatively significant loss of biological resources in the region. The Redevelopment Plan's incremental contribution to this significant cumulative impact is **cumulatively considerable**.

As identified under **Impacts 4.9.1 through 4.9.6** above, implementation of the proposed project would result in less than significant impacts to biological resources in the Project Area. Past, present, and planned development in the cumulative area has resulted and will result in significant impacts on special status species, habitat for non-special status birds, jurisdictional waters of the U.S., and wildlife movement corridors. Extensive vernal pools and other important habitat exists in the southern portions of the Rancho Cordova General Plan Planning Area and planned development of these areas could result in direct and indirect impacts to wildlife. The region also contains areas of oaks and other landmark trees that could be impacted by future development as well. Additionally, development of large areas of previously undeveloped land could impact existing wildlife movement corridors as well.

The proposed project, as described in the discussions above, would not have a substantial contribution to these cumulative impacts as the proposed project would have less than significant impacts on these biological resources. The only exception regards indirect impacts to both listed and non-listed special status species (see **Impacts 4.9.1** and **4.9.2**, above). The proposed project would not have a substantial indirect impact on special status species within the Project Area. However, substantial employment growth is expected in the Project Area (see Section 4.2 of this EIR) and this employment growth could result in additional growth in the surrounding area, including the currently undeveloped portions of the City to the south of the Project Area, to support and house these additional employees. The Redevelopment Plan would facilitate growth initiated as a result of the proposed Rancho Cordova General Plan. Such growth could be cumulatively considerable when considered with the expected cumulative indirect impacts to special status species. Therefore, the proposed project's incremental contribution to indirect impacts on special status species would be **cumulatively considerable** and the impact would remain **significant and unavoidable**.

Mitigation Measures

None proposed.

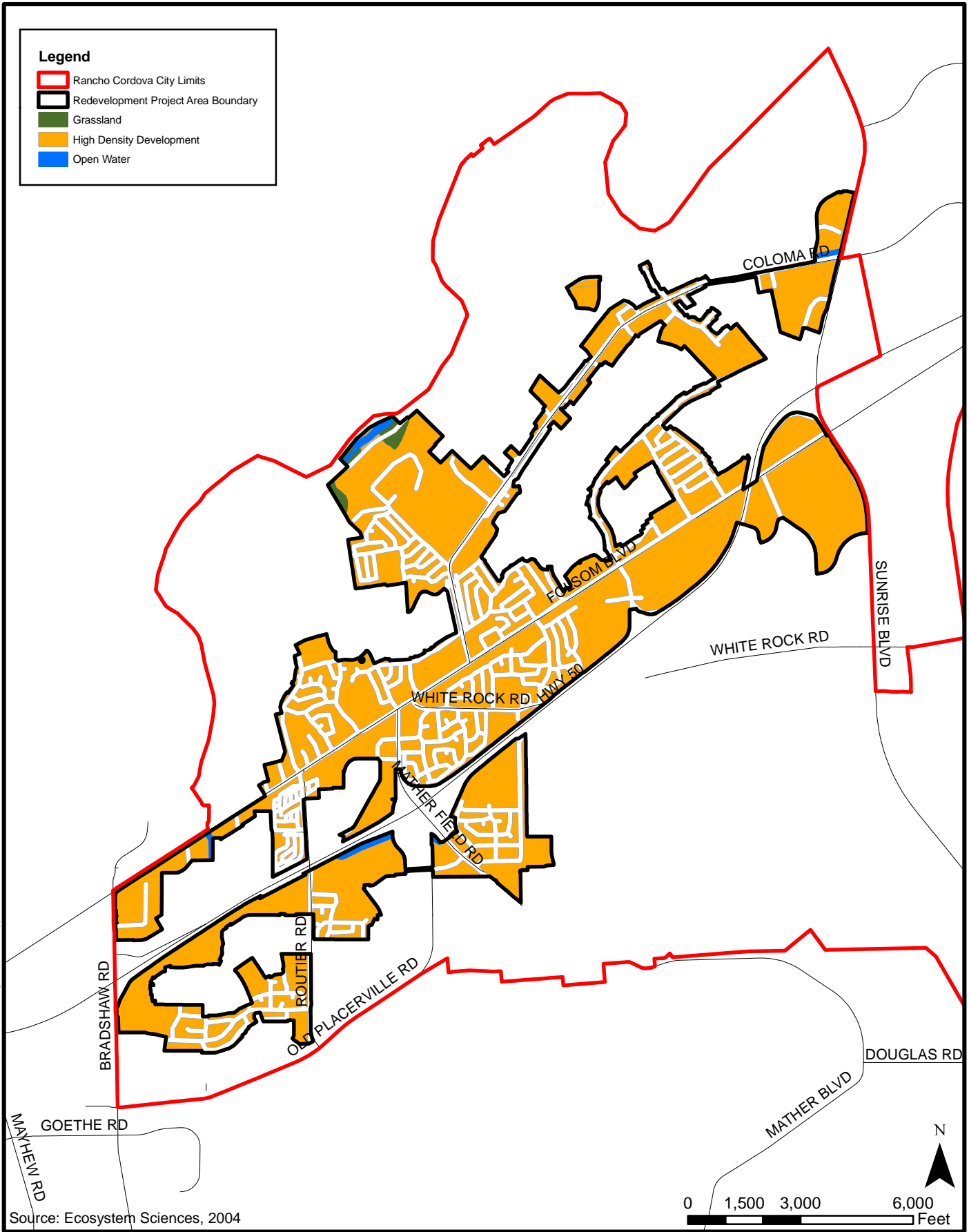
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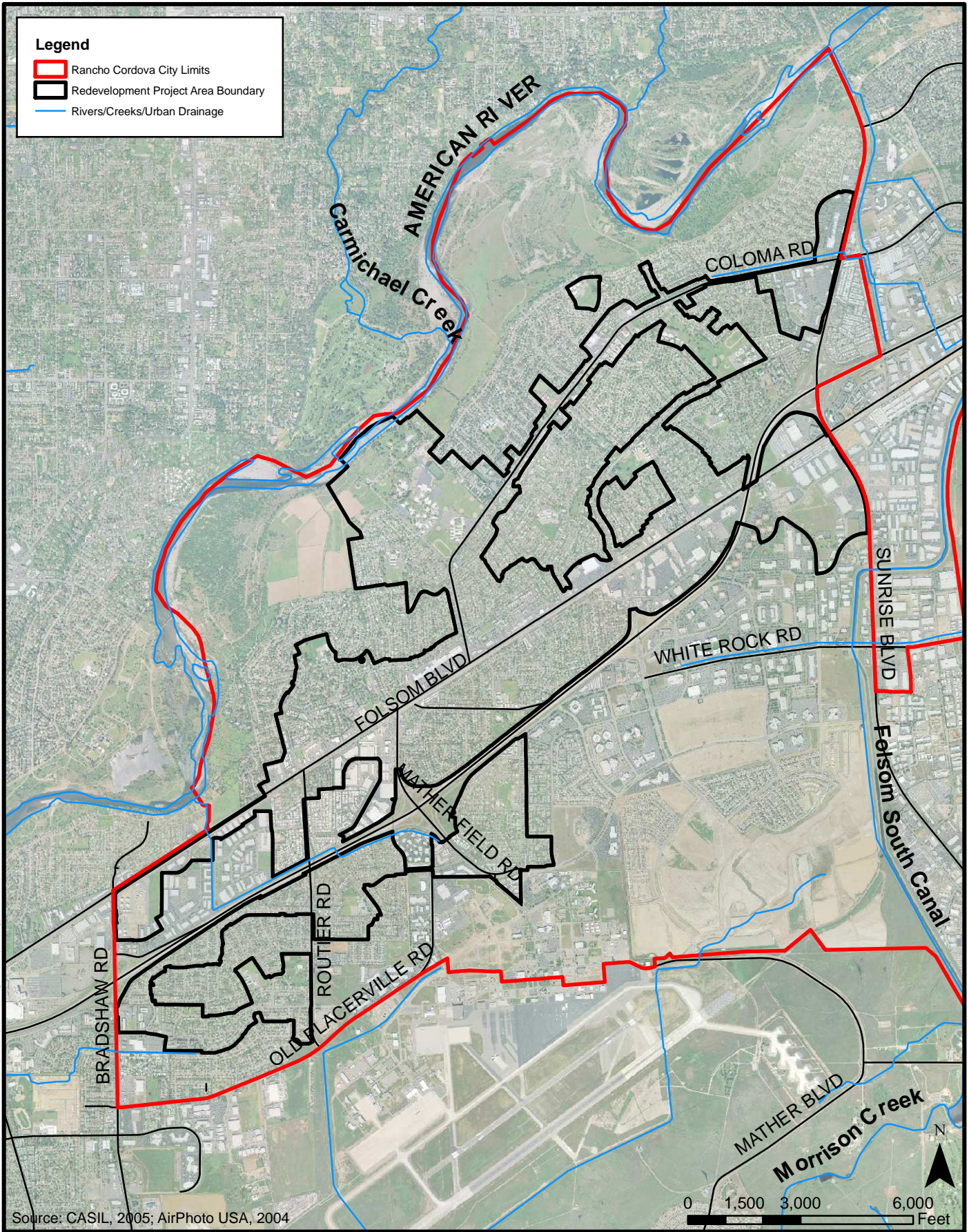


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City of Rancho Cordova
Planning Department

Figure 4.9-1
Habitat Cover Types
Within the Redevelopment Project Area

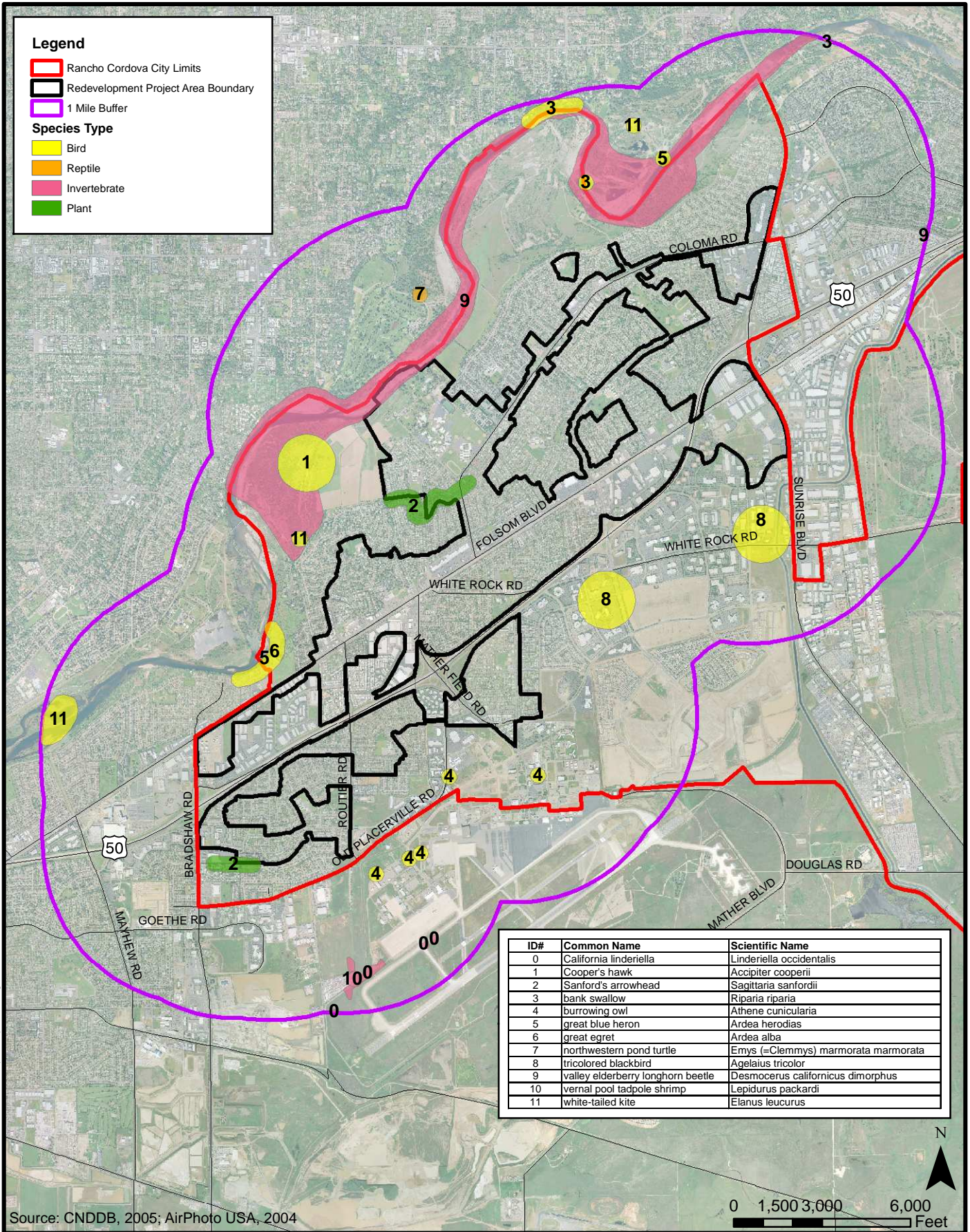


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City of Rancho Cordova
Planning Department

Figure 4.9-2
Rivers and Creeks
Within the Redevelopment Project Area Vicinity



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City of Rancho Cordova
Planning Department

Figure 4.9-3
Recorded Occurrences of Special-Status Species
Within 1 Mile of the Redevelopment Project Area