



US Army Corps
of Engineers

PUBLIC NOTICE

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DATE: April 14, 2000

RESPONSE REQUIRED BY: May 14, 2000

Regulatory Branch

333 Market Street

San Francisco, CA 94105-2197

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1. **INTRODUCTION:** Andromeda Development Group, Inc., Cassiopeia Investors, Inc., and Ursus Development Group, Inc., (the applicants), through their agent Mrs. Brigitta Brondi, 3625 Westwind Boulevard, Santa Rosa, California 95403, (707-579-2400), have applied for a Department of the Army permit to fill a total of 5.95 acres of seasonal wetlands to facilitate development on 3 parcels of land, to expand and complete the Westwind Business Park. The proposed commercial office development is located on unincorporated land north of the City of Santa Rosa, Sonoma County, California. This application is being processed pursuant to the provisions of Section 404 of the Clean Water Act (CWA), (33 U.S.C. 1344).

2. PROJECT DESCRIPTION:

a) Location of the Westwind Business Park - As shown on the attached drawings, the proposed 87-acre commercial office park is located adjacent to and east of the Sonoma County Airport, and approximately 6 miles north of the City of Santa Rosa, west of Highway 101, and along the south side of Airport Boulevard.

b) Regulatory Background - The applicants propose to fill all of the remaining seasonal wetlands that occur on the subject property, some of which may be considered vernal pools, some of which are in the form of drainage ditches that channel the water off the property (and likely replace what was formerly a natural tributary system), and other surface land depressions left over from past ground disturbance, that pond water or remain saturated at the ground surface on a seasonal basis. These wetland features occur in a mosaic of patches and swales on 53 acres of undeveloped land that is part of the property boundaries of the Westwind Business Park (see figure 3). The project site is in the Santa Rosa Plain, an area that has been identified by San Francisco District to have unique wetland habitats (vernal pools) worthy of special environmental review and protection (Corps

Public Notice 97-1A, July 1997, referenced on the District web site, <http://www.sfn.usace.army.mil/regulatory>.)

The Westwind Business Park, as proposed, includes four large parcels, some of which have already been developed into commercial buildings and parking lots. The four parcels are named *Copperhill*, *Andromeda*, *Cassiopeia*, and *Ursus* (see figure 3, attached). The Copperhill parcel (APN 059-250-028) which covers 11.7 acres of land, has already been developed, and was authorized under Corps of Engineers nationwide permit 26 (file 23336N) in November 1998. The Andromeda North parcel (APN 059-260-028) covers 16.4 acres of undeveloped land. The southern portion of the Andromeda parcel has already been developed. Two of its five existing buildings, were authorized by the Corps, Bldg. E by nationwide permit 26 (file 23116N), and Bldg. F by individual permit (file 23495N), in November 1997 and August 1998, respectively. These were after-the-fact authorizations that account for 9.6 acres of development.

The Corps never formally authorized buildings C, D and H. C and D were constructed sometime between 1985 and 1987, and Buildings H and I appeared on the property sometime before 1994. All four were prior to the special status designation of the Santa Rosa Plain by San Francisco District, and prior to the regional notification requirement to our office under nationwide permit #26. Presumably, these buildings were authorized under the non-reporting terms of nationwide permit 26. Accordingly, the Corps has no record of a permit application or authorization to fill wetlands for the construction of these buildings.

The Cassiopeia parcel (APN 059-260-025) covers 11.8 acres of undeveloped land. Building I with surrounding parking lot sits on the eastern portion of this parcel. The Ursus parcel (APN 059-260-026) is the southernmost and occupies 24.4 acres, most of which is undeveloped but includes a few existing

buildings pads from former land uses. These will be replaced by the new proposed development. The entire Westwind Business Park site is currently zoned for industrial and commercial use.

The Corps has already verified Section 404 authorization in three separate reviews and approvals of permit requests. These authorizations are listed below:

File 23336N	Copperhill	0.61 acres of fill
File 23116N	Building E	0.32 acres of fill
File 23495N	Building F	0.06 acres of fill

Therefore, the Corps has collectively already authorized approximately 1 acre of fill placed in special aquatic sites. Each authorization has required a minimum ratio of 1:1 (acre filled per acre created) for mitigation. A total of approximately one acre of compensatory mitigation credit has been accomplished to date through the use of mitigation bank credits.

c) Current Project to be Evaluated: The applicants are requesting authorization to place fill in all remaining wetlands on the undeveloped portions of the parcels that comprise the Westwind Business Park. Specifically, the applicants are applying to place fill in:

0.95 acres of wetlands on the Andromeda parcel
0.42 acres of wetlands on the Cassiopeia parcel
1.33 acres of wetlands on the Ursus Parcel

The total area of wetland the applicants are requesting authorization to fill is 2.70 acres.

However, the Corps of Engineers is not in agreement with the applicants' delineation of jurisdictional wetlands on either the Cassiopeia or the Ursus parcels. Additionally, although the Corps' approved map showing the extent of Corps jurisdiction on the northern portion of the Andromeda parcel was not disputed, our quantification of the area of wetlands to be filled differs from that quantified in the application. The Corps will consider authorizing the following areas of wetlands to be filled:

1.77 acres of wetlands on the Andromeda parcel
1.40 acres of wetlands on the Cassiopeia parcel
2.78 acres of wetlands on the Ursus parcel

The total is about 5.95 acres, (see figures 5,6 and 7). Of this total, approximately 0.58 acres are comprised

of manmade drainage channels that retain wetland hydrology and vegetation, and likely replaced natural drainage swales that were present prior to historic land alteration (see below).

A drawing that illustrates the Masterplan for the Westwind Business park is included as Figure 4. This Plan indicates that the Westwind Business Park will consist of 21 buildings, which collectively will occupy 1,205,340 square feet. The entire Park will cover 87 acres and will include infrastructural improvements such as parking lots, roads, and landscaping amenities.

The application explains that the applicants intend to develop the Ursus Parcel first, prior to the Andromeda North and Cassiopeia parcels. Currently, the Ursus parcel is the southern most parcel and is the only one without any existing buildings. The permit application also mentions that the proposed buildings on all the parcels would be either one, one and a half, or two stories high, with height limitations imposed by the Federal Aviation Administration (FAA) advisory circular limits on structure level. The property is in the Traffic Pattern Zone for the Sonoma County Airport.

d) Project Purpose and Need: The application states that the purpose of the project is to provide office space, research and development areas and manufacturing facilities in a campus-like setting, consistent with the Sonoma Airport Industrial Area Specific Plan. It specifies that the reason for developing the 3 parcels is to meet the goals and objectives established by the County Board Resolution of the Sonoma County Plan to provide for the interest and needs for the growing economy of Santa Rosa, California.

The Corps has defined the overall project purpose as providing new commercial/industrial office space to the Santa Rosa/Windsor/Rohnert Park region. The proposed work would be a continuation of the developed commercial real estate that already exists within the Business Park boundaries. The commercial real estate is apparently in demand in the economically expanding Santa Rosa/Windsor region.

e) Site History: The application explains that in the 1930's the parcels were included as part of the Sonoma Municipal Airport Area. During World War II, the Airport was "...heavily graded and reduced in all of the land characteristics by the US War Department for

use as the Santa Rosa Army Air Base", which covered over 340 acres. "In late 1946, the War Department returned the airport to the County, removing the barracks structures, then returned the land East of the airport to private ownership." However, the application explains that "...not all War Department Army Base debris was removed, as directed and funded by Congress, but instead, debris was buried 12' to 15' underground on the three Parcels, further disrupting the natural functions of the soils at several depths." The property has since remained largely idle, or subjected to light farming activities for the next 40-odd years. Investors in the Westwind Business Park purchased the property in 1985.

The agent has persistently claimed that because of the historic War Department use of land in this region, the project site qualifies for the Defense Environmental Restoration Program (DERP) Formerly Used Defense Sites (FUDS) program for Federal funding to excavate any leftover hazardous debris that may be buried on site. This program is administered out of the Sacramento District, Corps of Engineers. The Corps has possibly identified items targeted for Federal 'clean-up' operations under the FUDS program in the vicinity of these three parcels. However, the agent claims that the clean-up operation is an integral part of this permit request, and that the applicants will perform this activity on their own because they wish to proceed ahead of the Government schedule. If their clean up operations result in discharges into waters of the U.S., the fill would be subject to Corps CWA evaluation and authorization with appropriate mitigation.

f) Environmental Setting: The undeveloped land is quite flat overall, and has subtle depressions on the surface that pond water during the rainy season (December through March, generally). The depressions are fringed by soil that maintains subsurface saturation through the depth of the root zone for a minimum of several weeks each year. The perched subsurface water tables are typical within the Santa Rosa Plain.

There are four species of endangered endemic wetland plants that are known to occur within the Santa Rosa Plain Region. One, Burke's goldfields, (*Lasthenia burkeii*) was observed at 3 locations within the project site by a biologist performing plant surveys in 1997-98. Habitat for Burke's goldfields is present in several 'pools' within these three parcels. The Corps permit evaluation for Building F included addressing

impacts to the goldfields that occurred in one of the pools that was to be filled for the construction of that portion of the development. We are unaware that any of the other species of wetland endangered plants that occur within the SR Plain has been observed on the subject property to date.

The application states that several biologists have surveyed the property for rare and endangered plants since the '97-98 surveys, but none has been observed. Due to past land uses which, in addition to the historic military uses include more recent cattle grazing and hay production, much vegetative cover on the site is dominated by non-native annual grasses such as Harding grass (*Phalaris aquatica*), medusahead (*Taeniatherum caput-medusae*), ryegrass (*Lolium multiflorum*), soft chess (*Bromus hordeaceus*), rattlesnake grass (*Briza major*), and oat (*Avena sativa*). The wetland areas tend to support semaphore grass (*Pleuropogon californicus*), California oat grass, (*Danthonia californicum*), Mediterranean barley (*Hordeum marinum*), ryegrass, harding grass, and rushes such as *Juncus tenuis* and *J. phaeocephalus*.

In ground truthing the parcels to verify and map the extent of wetlands on the parcels, Corps staff observed, in some of the more extensive pools on the southern half of the Ursus parcel, a diversity of distinctive vernal pool plants such as coyote thistle (*Eryngium aristulatum*), sky blues (*Downingia concolor*), and spike rush (*Eleocharis macrostachya*).

The application includes two "Habitat Quality Site Evaluation" summaries, one for the Cassiopeia and Ursus parcels, and one for the Andromeda North parcel. These evaluations were performed in December 1998 but contain no supportive data or explanation of methodology. Both evaluations assigned "Biological Resource" scores below 125, and concluded that all wetland resources on site are of low quality.

g) Proposed Mitigation: To offset the loss of seasonal wetland habitat, the agent, Mrs. Brondi, has stated, in a "MFR" dated March 3, 2000 included with the permit application, that there is a "commitment to purchase 1.2 acres of credit at the Petaluma Hill Mitigation Area". She also claims that no other mitigation credits are available at this time, and that they are on a waiting list for mitigation credits when they become available.

Specifically, the application states that the applicants are prepared to mitigate for the loss of 2.70 acres of wetlands by using a 1/2:1 ratio, and thus purchasing a total "...of 1.35 acres of credit at a Corps certified high quality mitigation bank."

The applicants also propose, "...as part of the three Parcel's Mitigation Plan, to build and set in three strategic locations within each of the three Parcels, a 'Wetlands and Habitat Marker' to preserve the County Airport Industrial Area 'historical sites' for the CWA/NEPA environmental protections for which we all strive."

3. STATE APPROVALS: Under Section 401 of the Clean Water Act, an applicant for a Corps permit must obtain a State water quality certification or waiver before a Corps permit may be issued (33 U.S.C. 1341). The applicants are hereby notified that, unless the Corps is provided a valid request for State water quality certification by the Regional Water Quality Control Board (RWQCB) within 60 days of the date of this public notice, the District Engineer may consider the permit application to be withdrawn. No permit will be issued until the applicant obtains the required certification or waiver. A waiver will be explicit, or it may be presumed, if the State fails or refuses to act on a valid request for certification within 60 days of receipt, unless the District Engineer determines a shorter or longer period is reasonable for the State to act.

Those parties concerned with any water quality issues that may be associated with this project should write to the Executive Officer, California Regional Water Quality Control Board, North Coast Region, 5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403, by the close of the comment period of this public notice.

4. PRELIMINARY ENVIRONMENTAL

ASSESSMENT: The Corps of Engineers has assessed the environmental impacts of the action proposed in accordance with the requirements of the National Environmental Policy Act of 1969 (Public Law 91-190), and pursuant to Council on Environmental Quality's Regulations 40 CFR 1500-1508 and Corps of Engineers' Regulations, 33 CFR 230 and 325, Appendix B. Unless otherwise stated, the Preliminary Environmental Assessment describes only the impacts (direct, indirect, and cumulative) resulting from

activities within the jurisdiction of the Corps of Engineers.

Impacts to the Physical Environment

a) Substrate: The 53 acres that are proposed to be developed for the Westwind Business Park would result in substantial substrate alteration. After excavating and removing an undisclosed amount of soil that is unsuitable for building purposes, as well as 'cleaning out' various forms of buried debris left by the War Department during World War II, several thousand cubic yards of clean soil are proposed to be imported to the site and compacted to make it suitable for building. Under the current scenario, all existing seasonal wetlands that occur on the property would be filled, and replaced with compacted soils suitable for construction of buildings, parking lots, roads, or artificial landscape features. The extensive alteration of substrate is considered adverse, permanent, and moderate to major in magnitude.

b) Drainage Patterns The existing commercial buildings have already altered the drainage patterns on the property to an extent. The remaining seasonal wetlands and naturalized grassland in the undeveloped areas continue to attenuate storm flows that, according to information in the application, flow north across the property, into the infrastructure of stormdrains that feed Windsor Creek, and then southwest into Mark West Creek, (which also flows just south of the southern border of the Ursus parcel). There are about 0.6 acres of drainage channels on the Ursus and Cassiopeia parcels that would be filled and we assume, replaced with underground culverts that feed to an existing stormwater system. The beneficial aspects to the existing vegetated drainage features include providing wetland habitat during the winter and spring, providing cleansing functions to water quality, and also attenuating stormwater flows on the property. These beneficial functions will be lost as a result of project construction. These adverse impacts on drainage patterns would be permanent and moderate in magnitude.

c) Flood Control Function of Wetlands: The native substrate, even in its somewhat altered condition from past farming practices and military operations, acts like a sponge, and retains a large volume of stormwater, over the approximately 53 undeveloped acres. The

water table is perched atop a subsurface argillic horizon which prevents the downward penetration of surface water below 25 to 40 inches, which is characteristic of the Huichica soils that are common within the Santa Rosa Plain, and causes the seasonal wetland features to form. Incrementally, loss of this substrate compounds regional flooding downstream, within the Plain. Replacing the flood attenuating substrate with impervious surfaces would contribute to flashier stormwater runoff, and may necessitate other engineered flood control structures downstream, on Mark West Creek, the Laguna de Santa Rosa, or even the Russian River. This adverse impact will be long term and moderate in magnitude.

d) Water Quality: The existing wetlands and surrounding area may contribute to enhanced water quality by filtering and assimilating various sediments, nutrients, and pollutants from detained stormwater. Project construction would replace these wetland areas with impervious surfaces (roofs and pavement). This effect is considered adverse, permanent and moderate in magnitude.

e) Air Quality - Grading work, operation of construction equipment and other construction activities occurring in jurisdictional wetland areas would generate various air pollutant emissions, including fugitive dust, carbon, nitrogen and sulfur dioxides, and reactive organic gases. Currently, we have no information regarding the timing of project construction or whether the Business Park will be constructed in phases. However, in view of the relative project scale and limited area of affected wetlands (approximately 10% of the area to be developed is jurisdictional), and based on the assumption that the proposed construction will not all be accomplished at the same time, but phased in some form, the Corps has determined that the total direct and indirect project emissions would not exceed the *de minimus* threshold levels of 40 CFR 93.153. Air pollution emissions associated with project construction in wetlands would cause adverse but short-term and minimal impacts to ambient air quality.

f) Noise - Operation of heavy equipment and other construction activities could be audible from nearby commercial office buildings, causing adverse, but short-term and minor impacts to ambient noise levels. However, the site is adjacent to the Sonoma County

Airport so ambient noise levels tend to be at an elevated level anyway.

Impacts to the Biological Environment

a) Wetlands - The Santa Rosa Plain was once a mosaic of valley oak woodlands and grasslands crossed by creeks and tributary drainages. The flat terrain, clayey soils, and relatively high rainfall contributed to the once widespread occurrence of seasonally ponded or saturated areas known as seasonal wetlands and vernal (springtime) pools and swales. For over a century, human activities have brought about broad-scale changes on the Santa Rosa Plain, with commensurate effects on this mosaic of habitats and the associated drainage patterns. Agricultural practices, and more recently, ever increasing land development activities along with accompanying roads and infrastructure, have cumulatively realigned native drainages, removed trees, and largely modified and isolated remnants of the natural habitat. In the last 30 to 40 years, the changes have accelerated with the advance of commercial and residential development, as well as the rapid expansion of new vineyards. Today, little of the original mosaic and relatively few of the natural areas remain (Phase 1 Final Report, Santa Rosa Plain Vernal Pool Ecosystem Preservation Plan, CH2M HILL, 1995).

While the 53 acres of undeveloped land that comprise the Andromeda, Cassiopeia, and Ursus parcels have been largely disturbed and altered over much of this last century, remnants of the vernal wetland mosaic persist. Some of the swales are less degraded than others; some portions of the land have recovered native wetland plant communities. Other swales support mostly the weedy annual species typical of disturbed areas. As jurisdictional patches of land, they are scattered throughout much of the undeveloped areas such that it is virtually impossible to develop any sizeable parcel without placing some fill in wetlands.

To offset the loss of the 2.70 acres of wetlands that the applicants have quantified and proposed to fill, they offer to reserve credits at a Corps approved mitigation bank at a ratio of one half unit of area compensated for every unit of area that will be filled. They have not yet identified where all the proposed mitigation credits will be purchased.

In contrast, the Corps has identified 5.95 acres of

wetlands that are proposed to be filled, which it considers to be a relatively large area, especially within the Santa Rosa Plain, where individual seasonal wetland swales tend to be small features, commonly ranging in size from only about 0.02 to 0.20 acres each, (sometimes larger), and it often takes the cumulative loss of many wetland swales to total one acre. Because of the uncompensated cumulative loss of seasonal wetlands in this area from past development, the remaining wetland habitats take on a greater level of importance to preserve and restore.

The proposed action would have permanent adverse impacts to the seasonal wetlands that occur on site. The 1.35 acres of compensatory wetlands created at a Corps approved mitigation bank offered by the applicants, would result in a net loss of 4.6 acres of wetland just from this action alone. Due to the sensitivity and rarity of this habitat, the impact from the loss would be considered major in magnitude.

b) Endangered species - Several plant species which are adapted to vernal pools in the Santa Rosa Plain have been listed as federally protected endangered species by the US Fish and Wildlife Service. These endangered species are Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), Sebastopol meadowfoam (*Limnanthes vinculans*), and many-flowered navarretia (*Navarretia leucocephala ssp. plieantha*). Of these species, only Burke's Goldfields have been reported to occur on two of the three vacant parcels considered in this application. The Corps is not aware of any formal plant surveys that have been performed on any of the subject parcels. Therefore, we cannot confirm that the other endangered plants do not occur on any of them, nor that the Goldfields are not more widespread than in a few pools with 'suspected' observations on the Ursus and Cassiopeia parcels.

The Corps has made a preliminary determination that the proposed filling of 5.95 acres of seasonal wetlands in this permit request may adversely affect populations of all of the endangered plants listed above. We will initiate individual formal Section 7 consultation with the U.S. Fish and Wildlife Service over the potential impacts of this project.

c) Wildlife Habitat - There are few trees on any of the parcels; most of the land is flat open grassland, traversed by manmade drainage swales. The site is habitat for small mammals and birds, reptiles and amphibians, with wildlife value as open space. The

Andromeda North parcel, bordered to the north by Airport Boulevard, to the west by the airport, and to the east by the Copperhill developed parcel, is somewhat isolated as open space, from the other two parcels, due to the development of Buildings C, D, E, F, and H, and Copperhill Road, that bisects the property. The Cassiopeia and Ursus parcels are adjacent, situated south of most of the existing buildings, and provide contiguous open space with Mark West Creek, south of the property.

Loss of these remaining undeveloped parcels of integrated wetland and upland wildlife habitat would be adverse, permanent, and moderate in magnitude.

Impacts to the Cultural Environment

a) Historic and Archaeological Resources - A Corps of Engineers staff archaeologist will assess the available information about cultural resources that may occur within the project area. If, based upon the available information, a field investigation of the permit area is warranted, and cultural properties listed or eligible for listing on the National Register of Historic Places are identified during the inspection, the Corps of Engineers will coordinate with the State Historic Preservation Officer to take into account any project effects on such properties.

b) Economics and Employment - The northern Santa Rosa/Windsor area is developing rapidly. The Airport Boulevard Corridor already has several newly completed commercial developments. There is apparent demand for more. The proposed build out of the Westwind Business Park site will provide 12 new commercial buildings, according to the Masterplan (9 exist already), which will initially provide employment for the construction industry, and subsequently offer employment opportunities within the commercial-business sector. The Corps understands that this development may likely be constructed building by building on an as-needed basis, as prospective tenants are identified. This has been the basis on which the existing buildings have been planned and financed. Development of the proposed three parcels is expected to be economically beneficial to the area.

Cumulative Impacts During the past 40 years, the Santa Rosa Plain has been transformed from a rural residential, agricultural area with large expanses of open space to a more urbanized and intensely agricultural area with a greater intensity of man-

induced alterations. The changes in land use have resulted in substantial losses of seasonal wetland habitat, especially vernal pools. This loss of seasonal wetlands has become so severe that four species of wetland adapted endemic plant species have been listed as federally protected endangered species.

The proposed filling of 5.95 acres of seasonal wetlands addressed in this pending permit application represents an additional incremental net loss of vernal pool habitat within the Santa Rosa Plain. In considering cumulative impacts for the entire 87-acre Westwind Business Park site, we factor in the 1.0 acre of wetland that has already been authorized and filled on the site, although 1 acre of mitigation credit has been provided to offset this loss. We are unable to quantify the wetland loss that occurred during the construction of Buildings C, D, H and I. Altogether, the total impacts to seasonal wetlands on this site since its acquisition by its investors in 1985 likely exceeds 7 acres. We consider this a substantial contribution to cumulative impacts to the remaining wetlands within the Santa Rosa Plain. However, if *all* the wetland areas proposed to be filled are fully compensated in some form that is acceptable to the Corps and other resource agencies, then the *net* adverse impacts to wetlands from the requested authorization to fill, may not amount to further loss and/or degradation of seasonal wetlands within the Santa Rosa Plain.

Along with the cumulative loss of seasonal wetlands within the Santa Rosa Plain, suitable sites to perform compensatory mitigation have also become fewer and more difficult to acquire and implement successfully. The Corps will encourage the applicants to consider opportunities to *avoid* filling portions of the Business Park site that contain the most valuable aquatic resources by redesigning their project, prior to our possibly accepting their proposal to purchase off site mitigation credits. This is consistent with a Memorandum of Agreement over Mitigation between the Corps and the U.S. Environmental Protection Agency dated February 1990.

Conclusions and Recommendations Based on an analysis of the above-identified impacts, a preliminary determination has been made that it will not be necessary to prepare an Environmental Impact Statement (EIS) for the subject permit application. Our Environmental Assessment for the proposed action has, however, not yet been finalized and this preliminary determination may be reconsidered if additional information indicates the project would *significantly* affect aquatic resources.

5. EVALUATION OF ALTERNATIVES: Evaluation of this activity's impact on the public interest will also include application of the guidelines promulgated by the Administrator of the Environmental Protection Agency under Section 404(b) of the Clean Water Act, 33 USC, Section 1344(b).

The Corps has determined that the project is non-water dependent and will involve placing fill in special aquatic sites. Therefore, the applicant will need to demonstrate how the project, with the proposed filling of 5.95 acres of wetlands, is the least environmentally damaging, practicable alternative that will accomplish the project purpose.

The Corps has preliminarily identified the overall project purpose as: The construction of a commercial business park within Sonoma County. No minimum size requirement for this business park has yet been identified.

The permit application submittal includes a section that documents the applicants' rationale and concludes that "no alternatives of any kind are possible for the three Parcels". The Corps will review and assess this alternatives analysis to determine whether the proposed project satisfies the Section 404(b)(1) Guidelines.

6. PUBLIC INTEREST EVALUATION: The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity and its intended use on the public interest as they relate to activities in, or affecting, the navigable waters of the United States and the discharge of dredged or fill materials into those waters. Evaluation of the probable impacts which the proposed activity may have on the public interest requires a careful weighing of all those factors which become relevant in each particular case. The benefits which reasonably may be expected to accrue from the proposal must be balanced against its reasonable foreseeable detriments. The decision whether to authorize a proposal, and if so the conditions under which it will be allowed to occur, are therefore determined by the outcome of the general balancing process. That decision will reflect the national concern for both protection and utilization of important resources. All factors which may be relevant to the proposal must be considered including the cumulative effects thereof. Among those are conservation, economics, aesthetics, general

environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shore erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people.

7. CONSIDERATION OF COMMENTS: The Corps of Engineers is soliciting comments from the public Federal, State and local agencies and officials, Indian Tribes, and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the Corps to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and other public interest factors listed above. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

8. SUBMISSION OF COMMENTS: Interested parties may submit in writing any comments concerning this activity. Comments should include the applicant's name, the number, and the date of this notice and should be forwarded so as to reach this office within the comment period specified on page one of this notice. Comments should be sent to: The San Francisco District, Army Corps of Engineers, Attention: Regulatory Branch, 333 Market Street, San Francisco, CA 94105. It is Corps policy to forward any such comments which include objections to the applicant for resolution or rebuttal. Any person may also request, in writing, within the comment period of this notice that a public hearing be held to consider this application. Requests for public hearings shall state, with particularity, the reasons for holding a public hearing. Additional details may be obtained by contacting the applicant whose address is indicated in the first paragraph of this notice, or by contacting **Peter Fox** of our office at **415-977-8454** or via email at pfox@spd.usace.army.mil. Details on any changes of a minor nature which are made in the final permit action will be provided on request.

MENDOCINO COUNTY

LAKE COUNTY

YOLO COUNTY

SANTA ROSA PLAIN
SONOMA COUNTY

WESTWIND BUSINESS PARK
NAPA COUNTY

SOLANO COUNTY

Scale: 1" = 20 Miles (Approx)

SEBASTOPOLE

SANTA ROSA

ROBERT PARK
COTATI

MARIN COUNTY

CONTRA COSTA COUNTY

SAN FRANCISCO

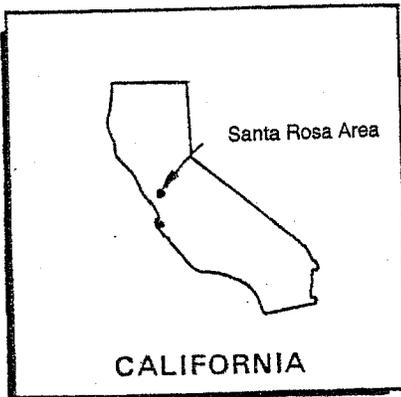
ALAMEDA COUNTY

SAN MATEO COUNTY

SANTA CLARA COUNTY

38° 00'

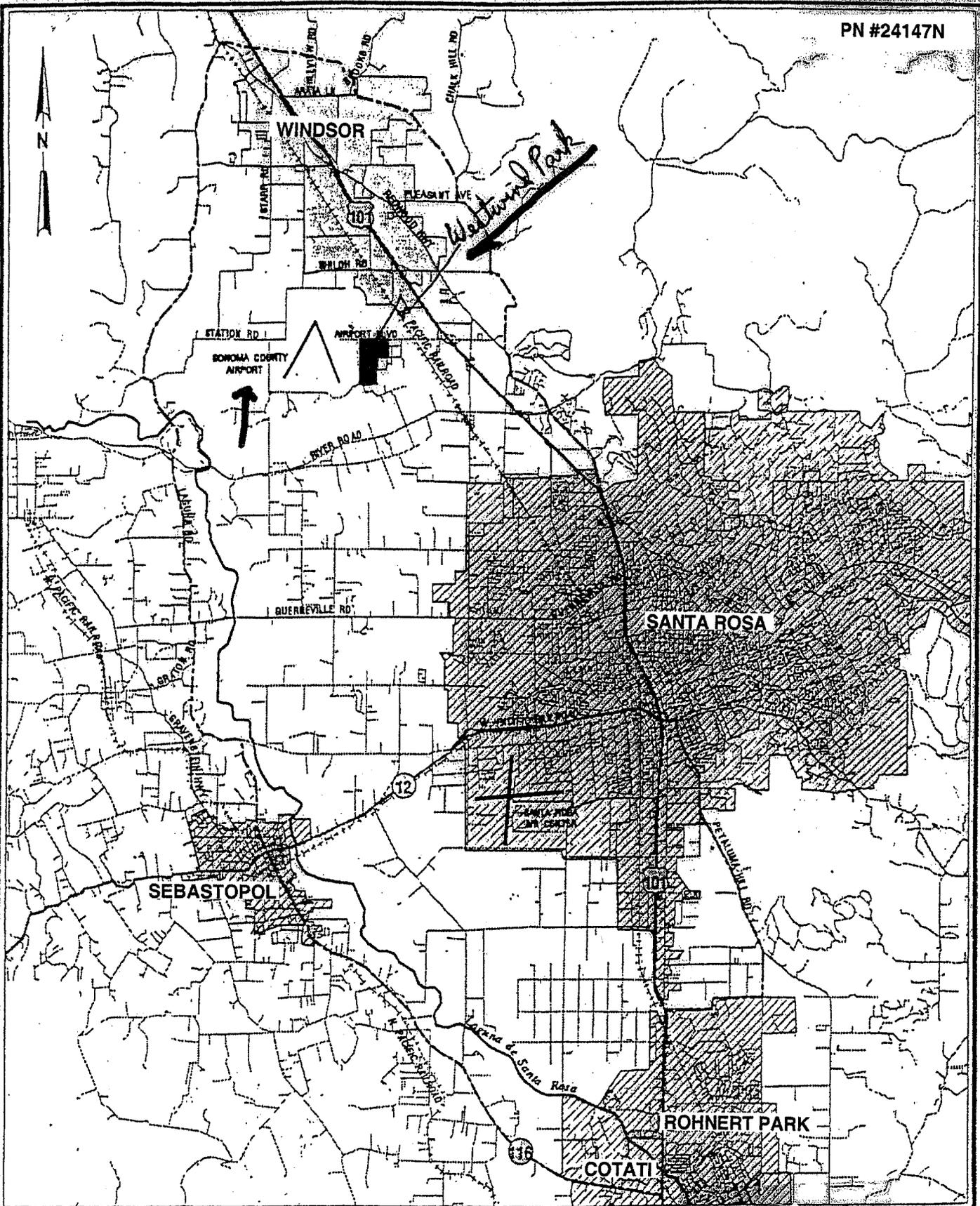
Pacific Ocean
123° 00'



Santa Rosa Plain

REGIONAL LOCATION

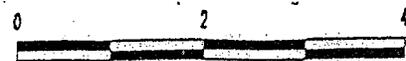
FIGURE 1



FEATURES:

-  City
-  Sphere of Influence
-  Vernal Pool Study Area

Study Area



MILES
(1 Inch = 2 Miles) **FIGURE 2**

PN #24147N

ANDROMEDA NORTH Airport Blvd.

Copperhill site

Sonoma County Airport

Cassiopeia parcel

North Laughlin Road

Copperhill Parkway

Westwind Blvd.

Wetland delineation not fully represented on this map, for Ursus parcel

Ursus parcel

jurisdictional wetland area

PN #24147N

Local Setting: Westwind Business Park

Scale: 1 inch = approx. 400 feet.

 = wetlands

Applicant: Andromeda Dev. Grp., Inc.,
Cassiopeia Invest., Inc. & Ursus Dev.
Grp., Inc. - Agent; Brigitta Brondi, 3625
Westwind Blvd., Santa Rosa, CA 95403

FIGURE 3

Masterplan

WESTWIND BUSINESS PARK SANTA ROSA, CALIFORNIA

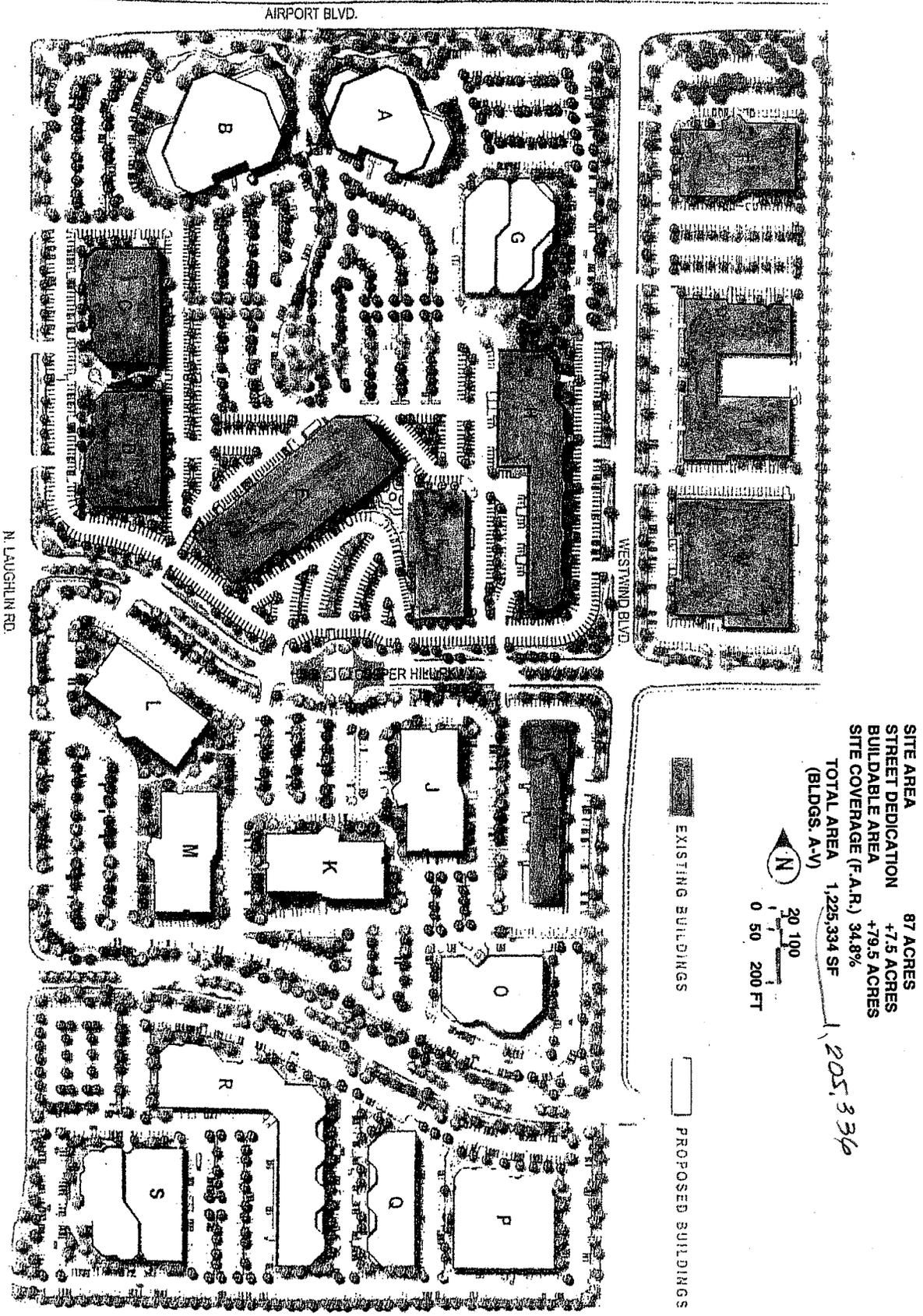
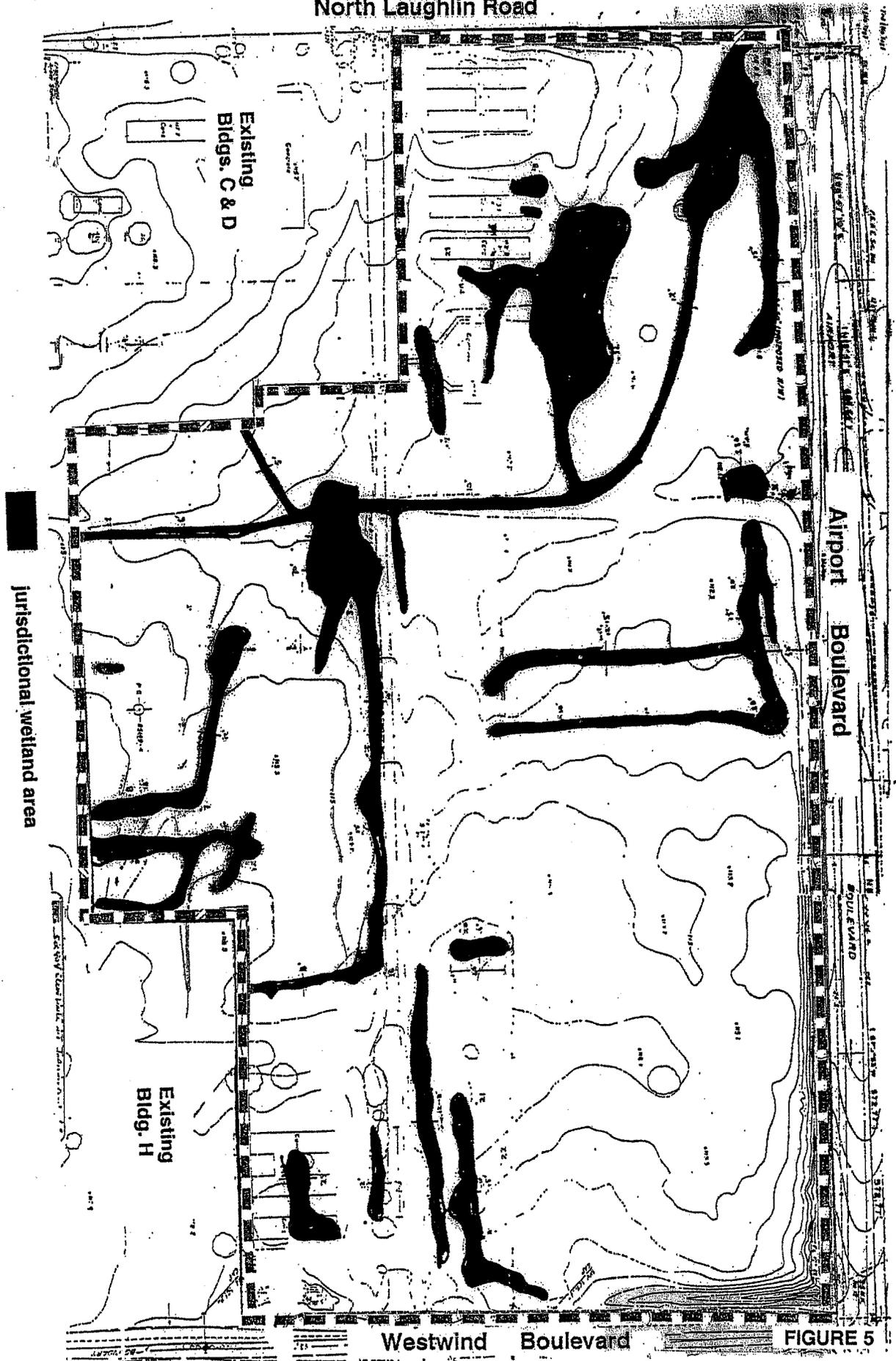


FIGURE 4

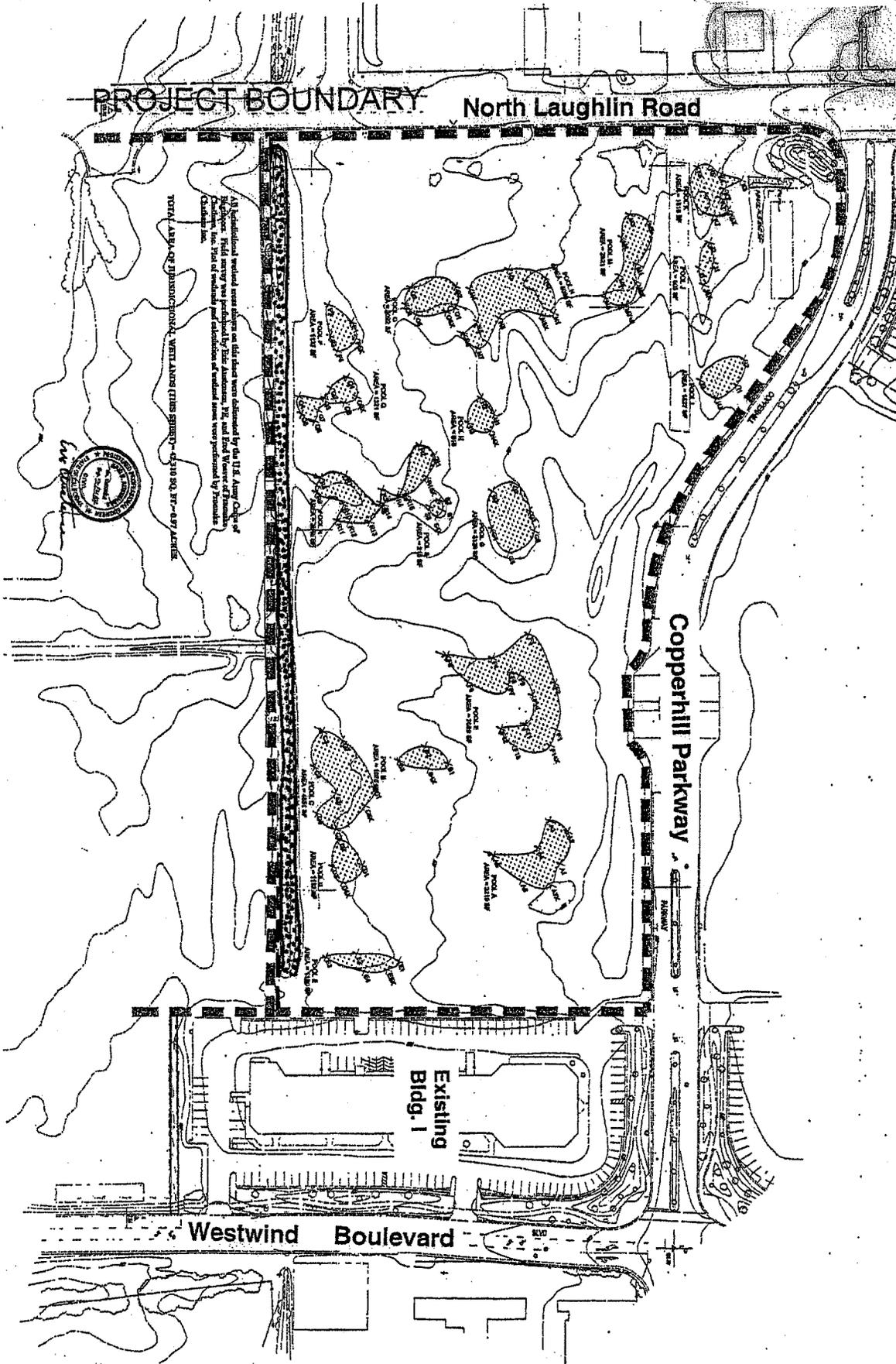
North Laughlin Road



ANDROMEDA NORTH

Westwind Boulevard

FIGURE 5



All jurisdictional wetland areas shown on this sheet were delineated by the U.S. Army Corps of Engineers. Field survey was performed by Eric Anderson, PE, and Paul Weaver of Providence Consulting, Inc. The pool of wetlands and collection of wetland areas were performed by Providence Consulting, Inc.

TOTAL AREA OF JURISDICTIONAL WETLANDS THIS SHEET - 4210 SQ. FT. - 0.07 ACRES.



PRUNUSKE CHATHAM, INC.
 P. O. BOX 828
 OCCIDENTAL, CA 95465
 (707) 874-0100

DATE: _____
 SCALE: _____
 CHECKED BY: _____
 DRAWN BY: _____

CASSIOPEIA PARCEL

WESTWIND BUSINESS PARK

PREPARED FOR:
WESTWIND BUSINESS PARK
 1000 WESTWIND BLVD
 WESTWIND, CA 95460

U.S. ARMY CORPS OF ENGINEERS
 JURISDICTIONAL WETLANDS
CASSIOPEIA PARCEL

SHEET 1 OF 2

-  Jurisdictional wetland area
-  Linear wetland feature (jurisdictional)

FIGURE 6

PRONUSKE CHARITAM, INC.
P.O. BOX 828
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(707) 874-0100

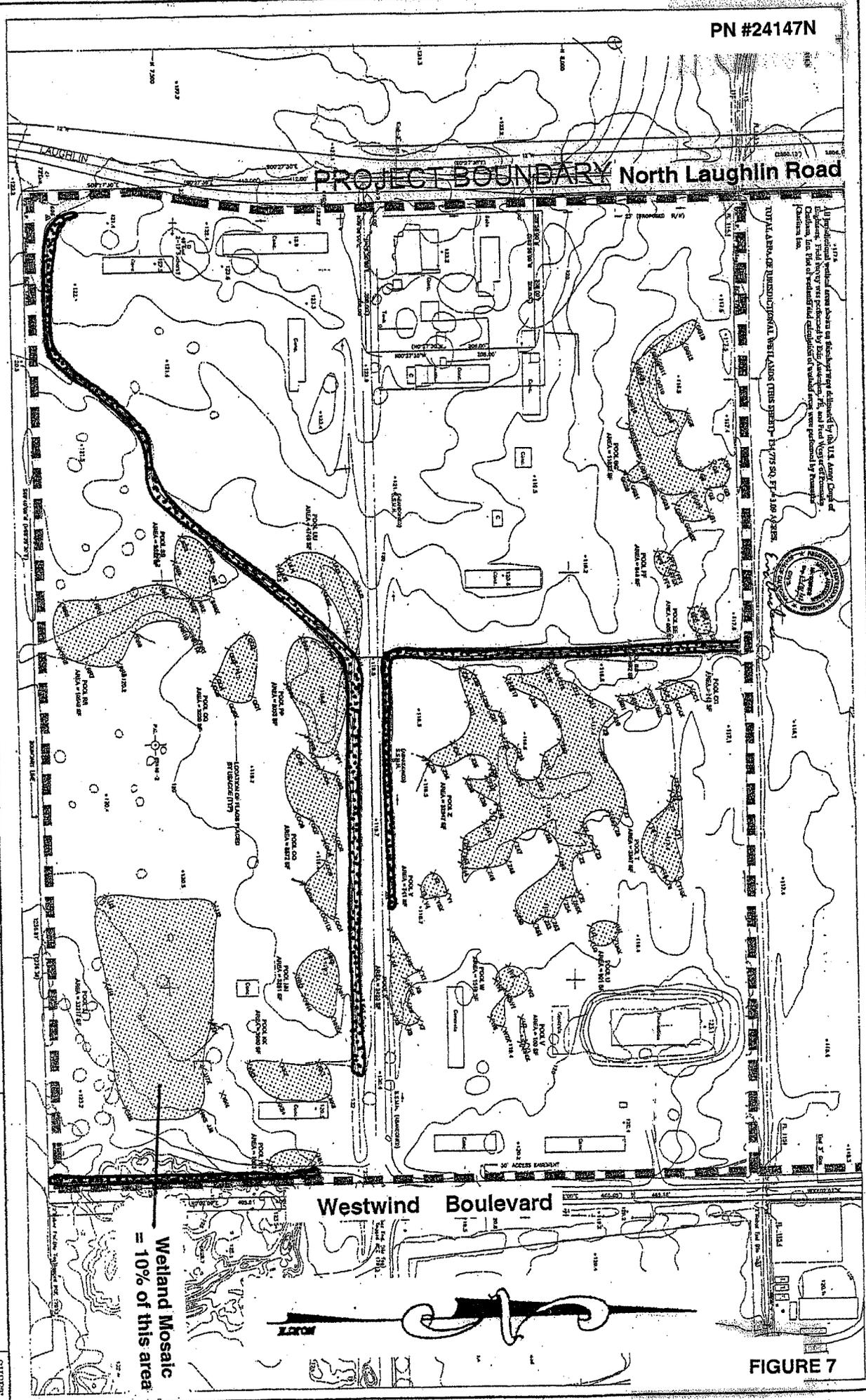
DATE: JULY 12, 1998
SCALE: 1" = 50'
CHECKED BY: EA
INDUSTRIAL DIV. FRW

URSUS PARCEL

PREPARED FOR:
WESTWIND BUSINESS PARK
WESTWIND BUSINESS PARK
WESTWIND BUSINESS PARK
WESTWIND BUSINESS PARK

U.S. ARMY CORPS OF ENGINEERS
JURISDICTIONAL WETLANDS
URSUS PARCEL 7

-  Jurisdictional wetland area
-  linear wetland feature (jurisdictional)



All jurisdictional wetland areas shown on this map were identified by the U.S. Army Corps of Engineers. Field surveys were conducted by Bob Anderson, P.E., and Tom Wright of Environmental Consultants, Inc. Data on wetland and riparian features were provided by the U.S. Army Corps of Engineers.



FIGURE 7