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***Subject: Aggie Research Campus: Impacts of Agricultural Buffer on Western Burrowing Owl Habitat***

The City of Davis invited public comment on the scope of the Draft Supplemental Environmental Impact Report for the Aggie Research Campus (ARC) Project on November 15, 2019. The City received comments from the public regarding the impacts of the Project's agricultural buffer on burrowing owl habitat. One such comment states that the Project proposes "planting trees and other tall vegetation on six and a half acres of the City's 25 acres," and that "[c]hanging the vegetation type is a significant impact to burrowing owls as owls cannot use land with tall vegetation." (Letter to City from Burrowing Owl Preservation Society, 4 Dec. 2019.) Another comment provides that "native plants should be planted in the section [of the agricultural buffer] adjacent to ... burrowing owl habitat," and that a plan should be put into place to "maintain the plants, and grasses, for the benefit of the burrowing owls." The purpose of this letter is to respond to these comments.

The existing croplands within the proposed Project site may provide burrowing owl foraging habitat and limited nesting opportunities for burrowing owls. No owls were observed on the ARC Project site during biological surveys. However, occupied burrowing owl burrows have been documented at six locations within approximately 500 feet of the Project boundary within the last three years. The six occupied burrow complexes occur along Road 30B, Road 104, and Mace Blvd in disturbed roadside areas, and in a vacant grassland east of Ikeda's Market (see 19 February 2020 letter from Sycamore Environmental Consultants, Inc., transmitting preliminary results of burrowing owl surveys for the Aggie Research Campus Project).

As proposed, the 150-foot wide, 22.6-acre agricultural buffer will abut active agricultural operations located along the north and east sides of the ARC site. The length of the buffer along the northern ARC boundary is approximately 3,460 linear feet. The length of the buffer along the eastern boundary is approximately 3,400 linear feet. Consistent with the City's agricultural buffer requirements, the ARC agricultural buffer will be comprised an inner 50-foot wide agricultural buffer/transition area with more active uses and an outer 100-foot wide agricultural buffer with more passive uses, which will be contiguous with agricultural land offsite. The following uses would occur within the publicly accessible 50-foot agricultural transition area: bike paths that encircle the ARC and connect to offsite facilities, pedestrian walking trails, community gardens (which will have an emphasis on native plants/pollinators), solar panels, benches and pedestrian-scale lighting. The remaining, outermost 100 feet of the buffer will be an approximately 1.3-mile-long, 14.9-acre open space corridor that will be designed to provide wildlife habitat and drainage. Three proposed artificial burrow complexes for burrowing owls would be constructed along with a drainage swale that outfalls into the existing Mace Drainage Channel. The swale will be shallowest just east of Road 104 and Road 32A. The swale will gradually deepen to convey stormwater to the Mace Drainage Channel. The banks of the swale/ditch and the 100-foot-wide passive use buffer would be suitable burrowing owl habitat even with clusters of native trees planted within the buffer.

To date, no occupied burrowing owl burrows have been identified within the proposed 150-foot wide agricultural buffer area. The agricultural buffer covers land that is currently disked and farmed, except for the perimeter of the property and the banks of the Mace Drainage Channel. As mentioned, burrowing owl burrows have been found nearby, and the ARC site – including the agricultural buffer area – provides suitable foraging habitat for burrowing owl. As such, the proposed Project activities within the agricultural buffer could potentially result in impacts to burrowing owl habitat.

To minimize Project related adverse impacts to burrowing owl nesting habitat – including all proposed activities within the agricultural buffer – the ARC will seek coverage under the Yolo Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP) and comply with its requirements. The HCP/NCCP will require the ARC to implement Avoidance and Minimization Measure 18 (AMM-18), entitled “Minimize Take and Adverse Effects on Western Burrowing Owl.” With respect to potential impacts to foraging habitat within the agricultural buffer area, the ARC will pay any applicable HCP/NCCP fees.

Further, in recognition of the fact that burrowing owls require relatively short vegetation and burrows for nesting, ARC will implement the following measures within the outer

100-foot portion of the agricultural buffer area to ensure that the existing and created habitat within this area will be beneficial for burrowing owls:

- Reduce or cluster trees to allow large expanses of grassland within the buffer,
- Implement seasonal mowing, or preferably, stock grazing of grassland areas in the buffer to maintain the short vegetation height preferred by burrowing owls,
- Preserve any California ground squirrels that colonize the buffer grasslands, including their burrows, and
- Establish the three artificial burrow complexes currently proposed in the agricultural buffer area. The buffer on the north side of the Project site, east of Road 104 is a particularly suitable location to establish one or more of the artificial burrows. There are nearby, occupied burrowing complexes along Road 104, on the Mace Blvd curve, and along Road 30B.

Cordially,



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