

April 17, 2015

Kerry Burke Burke Land Use 34 Amesport Landing Half Moon Bay, CA 94019

# Re: Riparian Habitat Areas Assessment at the 15<sup>th</sup> Street Parcel in Montara, San Mateo County, California

Dear Ms. Burke,

The purpose of this letter is to provide you of the results of the riparian habitat assessment for the proposed single-family residence and associated construction including a driveway on an undeveloped parcel (APN 037-015-090) located along the planned 15<sup>th</sup> Street easement in Montara, San Mateo County, California (Study Area). The site visit was conducted on March 27, 2015.

The focus of the site reconnaissance was to provide an analysis of potential constraints related to ESHAs, specifically setbacks related to riparian habitat.

#### Project Area Description

The proposed Project Area is located in Montara, California, in an existing residential neighborhood. Access is proposed off of 14<sup>th</sup> Street, as 15<sup>th</sup> Street has not been constructed. The Project Area is dominated by an existing weedy grass sod in the area of the proposed access easement off of 14<sup>th</sup> Street. The majority of the site is dominated by Monterey cypress stands (*Cupressus macrocarpa*) with sparse understory vegetation composed predominantly of poison oak (*Toxicodendron radicans*). Other scattered species observed within the Project Area include scattered common rush (*Juncus patens*), lollipop tree (*Myoporum laetum*), ripgut brome (*Bromus diandrus*), upright veldt grass (*Erharta erecta*), horsetails (*Equisetum arvensis*), iris (*Iris* sp.)

## Riparian Corridor

## Riparian Corridor and Buffer Zones Defined in the San Mateo County Local Coastal Program

Pursuant to the San Mateo County Local Coastal Program (LCP; County of San Mateo 2013), riparian corridors are defined as an association of plant and animal species containing at least 50 percent cover of the following species: red alter, jaumea, pickleweed, big leaf maple, narrow-

leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder. For perennial streams, the LCP requires a buffer 50 feet outward from the limit of riparian vegetation. For intermittent streams, the LCP requires a buffer 30 feet outward from the limit of riparian vegetation. Where no riparian vegetation exists, buffer zones along intermittent streams extend 30 feet from the stream midpoint as shown in the attached figure.

Within riparian corridors, the following uses are permitted: 1) education and research; 2) consumptive uses as provided for in the Fish and Game Code and Title 14 of the California Administrative Code, 3) fish and wildlife management activities, 4) trails and scenic overlooks on public lands, and 5) necessary water supply projects. Relevant permitted uses in buffer zones include 1) uses permitted in riparian corridors, 2) residential uses on existing legal building sites, set back 20 feet from the limit of riparian vegetation only if no feasible alternative exists and if no other building site on the parcel exists, 3) on parcels designated as Agriculture, Open Space, or Timber Production on the LCP Land Use Plan Map, residential structures or impervious surfaces only if no feasible alternative exists.

## Riparian corridor and buffer zones applicable to the Project Area

The site was walked by WRA biologists. Vegetation with the Study Area and vicinity was evaluated whether it met the criteria for riparian habitat and/or unvegetated streams as defined by the LCP. According to LCP ESHA maps (County of San Mateo 2013) and the most recent U.S. Geological Survey (USGS) 7.5 minute quadrangle topographic map (USGS 2015), a perennial blue-line stream referred to as Montara Creek is located south of the Project Area, parallel to the southern property line. This stream is identified as primary riparian corridor along the drainage. At the time of the site visit, riparian vegetation composed of arroyo willow was identified along the drainage and the edge of riparian vegetation mapped using aerial photographs and a handheld geographic positioning system (GPS) with sub-meter accuracy. This habitat is located outside of the Project Area and would be subject to a 50 foot riparian buffer measured from the limit of riparian vegetation.

A second, unvegetated drainage was identified outside of the Project Area, running parallel to the West Avenue street easement boundary and terminating in the riparian habitat along Montara Creek. This drainage was largely unvegetated and surrounded by Monterey cypress, and containing veldtgrass, common rush, and d pampasgrass (*Cortaderia* sp). As this drainage was located on private property, the edge of top of bank and centerpoint of the drainage were photographed and GPS points taken outside of the existing fenceline to best approximate the extent of the drainage. It is likely that this drainage would be considered an intermittent stream under the LCP and would require a 30 foot buffer measured from the drainage midpoint.

## SUMMARY

Figure 1 (Attachment 1) shows the mapped riparian habitat, riparian habitat buffer, and buffer along an intermittent stream with no riparian habitat. The Project Area is located outside of required buffers for these areas. Trees within the Project Area consist of Monterey Cypress and scattered pines (*Pinus* sp.). Monterey cypress is a widely planted species and is not considered protected outside of identified native stands within the Monterey Peninsula. The tree species within the Project Area do not qualify as riparian habitat as defined in the LCP.

Should you have any questions, comments, or concerns, please do not hesitate to contact our office.

Sincerely,

Tiffany Edwards Wetland Ecologist

Attachment A. Figure 1.

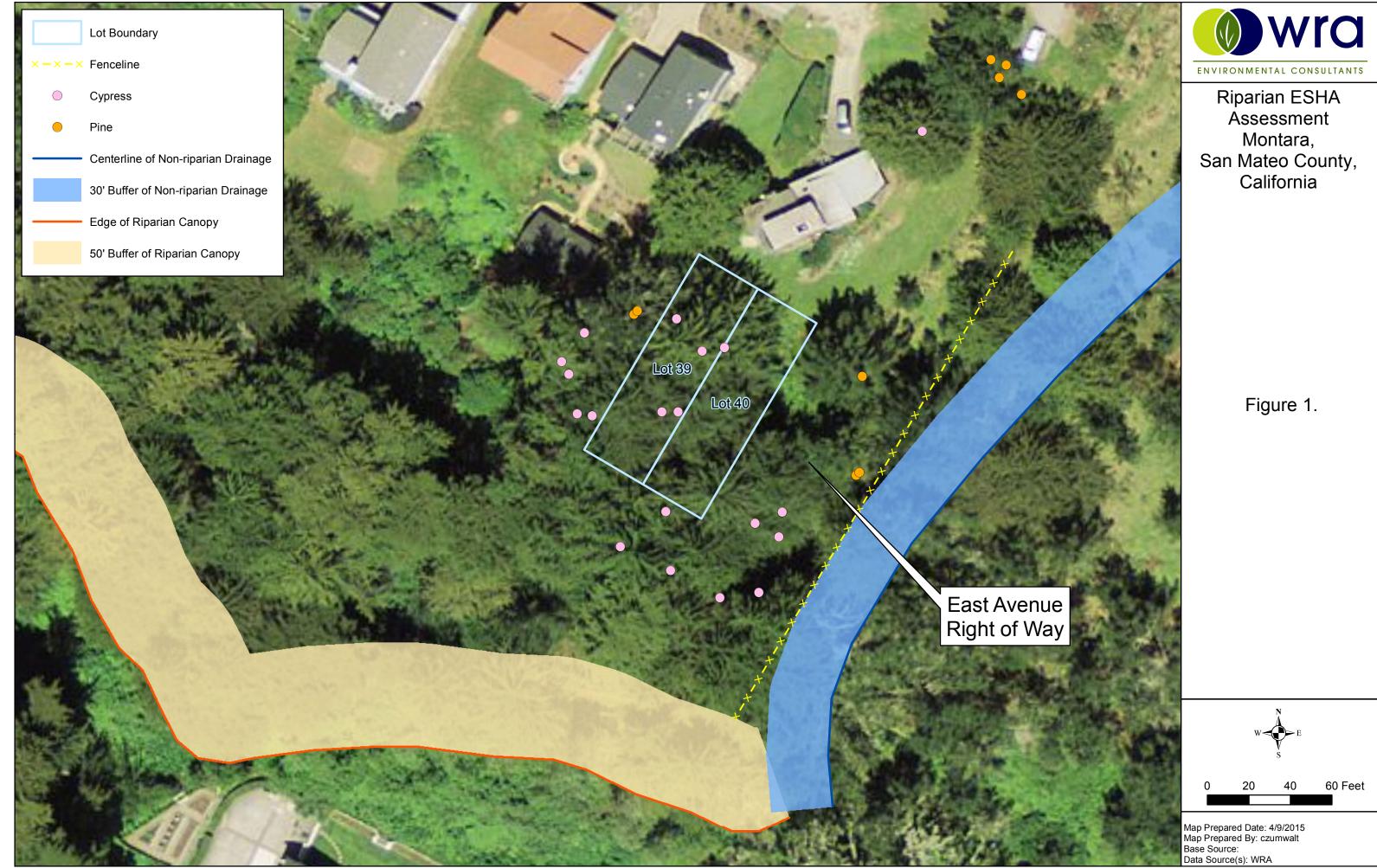
REFERENCES

County of San Mateo. 2013. Local Coastal Program. <u>https://planning.smcgov.org/documents/local-coastal-program-lcp</u>. Accessed March 2015

Google, Inc. Google Earth Images; 1993-2015. Accessed March 2015

[USGS] U.S. Geological Survey (USGS). 2015. Montara Mountain. 7.5 minute topographic map. Available at: <u>http://www.usgsquads.com/index.php</u>. Accessed March 2015. Attachment 1.

Proposed and Alternative Project Areas with Riparian Setbacks





August 7, 2015

Kerry Burke Burke Land Use 34 Amesport Landing Half Moon Bay, CA 94019

# RE: Biological Resources Assessment Report for APN 037-015-090, Montara, California

Dear Ms. Burke,

The purpose of this letter is to inform you of the results of the biological resource assessment for a proposed single-family residence and associated construction including a driveway on an undeveloped parcel (APN 037-015-090; Study Area) located along the planned 15th Street easement in Montara, San Mateo County, California (Figure 1). The proposed Project is approximately 0.31 acre. The purpose of this assessment is to comply with the San Mateo County Midcoast Local Coastal Program (LCP).

Figures are provided in Attachment A, the list of observed species from the 2015 site assessments are provided in Attachment B, and photographs depicting the current Study Area conditions are provided in Attachment C.

## **Survey Methods**

Site visits to the Study Area were made by Tiffany Edwards (WRA wetland ecologist) on March 27, 2015 and by Patricia Valcarcel (WRA wildlife biologist) on July 24, 2015. Prior to the site visit, a review was conducted of background information including:

- San Mateo County Midcoast Local Coastal Program (LCP) biological resources policies
- San Mateo County Heritage Tree Ordinance
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB; CDFW 2015)
- California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2015)
- U.S. Fish and Wildlife Service (USFWS) 7.5' Quadrangle Species Lists for the Montara Mountain quadrangle (USFWS 2015)
- CDFG publication "California's Wildlife, Volumes I-III" (Zeiner et al. 1990)
- CDFG publication "California Bird Species of Special Concern" (Shuford and Gardali 2008)
- CDFG publication "Amphibians and Reptile Species of Special Concern in California" (Jennings 1994)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)

The Study Area was traversed on foot by WRA biologists and examined for: (a) sensitive natural communities as defined by the CDFW and LCP and, (b) for the presence, and potential to support, special-status plant and wildlife species. Vegetation with the Study Area and vicinity was also evaluated for riparian habitat criteria and/or unvegetated streams as defined by the LCP. If a special-status species was observed during the site visit, its presence is recorded and discussed further below. For some species, a site assessment visit at the level conducted for this report may not be sufficient to determine presence or absence of a species to the specifications of regulatory agencies. In these cases, a species may be assumed to be present or further protocol-level special-status species surveys may be necessary. Special-status species for which further protocol-level surveys may be necessary are described further below.

# Survey Results

# Study Area Description

The Study Area is located in Montara, California, in an existing residential neighborhood. Access is proposed off of 14th Street, as 15th Street has not been constructed. The Study Area is dominated by an existing weedy grass sod in the area of the proposed access easement off of 14th Street. The majority of the site is dominated by Monterey cypress stands (*Cupressus macrocarpa*) with sparse understory vegetation composed predominantly of poison oak (*Toxicodendron diversilobum*). Other scattered species observed within the Study Area include scattered common rush (*Juncus patens*), lollipop tree (*Myoporum laetum*), ripgut brome (*Bromus diandrus*), upright veldt grass (*Ehrharta erecta*), horsetails (*Equisetum arvensis*), iris (*Iris* sp.). Although horsetails and common rush, which are considered to be wetland indicator species, occurred in the understory of the Monterey cypress, these species frequently occur in the coastal zone and coast range due to fog drip and reduced evaporation during the dry season from coastal cloud cover. Additionally, because of their low densities within the Study Area, they are not a reliable indicator of wetland condition and wetlands were determined to be absent.

# Vegetation Communities

Three vegetation communities will be affected by the proposed Project. Monterey cypress woodland; disturbed, non-native annual grassland; and developed land will be permanently and temporarily disturbed by the construction of a residence and access drive. Riparian woodland is located adjacent to the proposed Project, but riparian woodland is greater than 50 feet from the Project Footprint and unlikely to be impacted during development activities. The communities within the Study Area are shown in Figure 2.

## Non-sensitive vegetation communities

Holland (1986) describes non-native grassland as a dense to sparse cover of non-native annual grasses with flowering culms 0.2-1 meter high and often associated with numerous species of showy-flowered annual forbs. This community often occurs on fine-textured, usually clay soils, that are moist, or saturated during the winter rainy season and very dry during the summer and fall. This community covers 0.04 acre of the Study Area and dominates in the open area along the proposed access drive and open areas under the Monterey cypress woodland canopy. In the Study Area, annual grassland is dominated by ripgut brome and upright veldt grass, both of which are non-native species. Non-native and native forbs were also present in trace amounts. Annual grassland is maintained through mowing and weed-whacking and was typically less than two inches in height.

Monterey cypress woodland is comprised of a dense canopy of Monterey cypress with minimal understory. The understory, where it occurs, is dominated by poison oak with scattered occurrences of ripgut brome, upright veldt grass, and rush. The majority of the Study Area is covered in Monterey cypress and encompasses 0.25 acre. This species and community is only considered to be protected if it occurs within native stands. Native stands of Monterey cypress are well documented in the literature. There are only two native occurrences of Monterey cypress, both of which occur in the Monterey area; elsewhere, this plant is widely planted as an ornamental and has become naturalized in areas outside of this range (CNPS 2015). Therefore, Monterey cypress within the Study Area is not considered to be a sensitive community, although tree removal during development may require permits with the county.

Developed land within the Study Area (0.02 acre) consists of an existing roadway, the terminus of Fourteenth Street. The proposed Project will construct an access drive between the residence and the terminus of Fourteenth Street. Fourteenth Street is a paved residential street with a stormwater ditch along the downslope (southern) side of the street. The ditch was determined to be a non-riparian drainage because it is man-made in upland habitat and maintained for stormwater runoff. It is not considered a sensitive community.

#### Sensitive vegetation communities located outside of the Project Footprint

#### Wetland and Waters features

No wetlands or waters were observed onsite. One maintained, stormwater ditch was observed along Fourteenth Street, and as discussed above, it is not a sensitive community.

#### Riparian Corridor and Buffer Zones Defined in the San Mateo County Local Coastal Program

Pursuant to the San Mateo County Local Coastal Program (LCP; County of San Mateo 2013), riparian corridors are defined as an association of plant and animal species containing at least 50 percent cover of the following species: red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and box elder. For perennial streams, the LCP requires a buffer 50 feet outward from the limit of riparian vegetation. For intermittent streams, the LCP requires a buffer 30 feet outward from the limit of riparian vegetation. Where no riparian vegetation exists, buffer zones along intermittent streams extend 30 feet from the stream midpoint as shown in the attached figure.

Within riparian corridors, the following uses are permitted: 1) education and research; 2) consumptive uses as provided for in the Fish and Game Code and Title 14 of the California Administrative Code, 3) fish and wildlife management activities, 4) trails and scenic overlooks on public lands, and 5) necessary water supply projects. Relevant permitted uses in buffer zones include 1) uses permitted in riparian corridors, 2) residential uses on existing legal building sites, set back 20 feet from the limit of riparian vegetation only if no feasible alternative exists and if no other building site on the parcel exists, 3) on parcels designated as Agriculture, Open Space, or Timber Production on the LCP Land Use Plan Map, residential structures or impervious surfaces only if no feasible alternative exists.

## Riparian corridor and buffer zones applicable to the Study Area

According to LCP ESHA maps (County of San Mateo 2013) and the most recent U.S. Geological Survey (USGS) 7.5 minute quadrangle topographic map (USGS 2015), a perennial blue-line stream referred to as Montara Creek is located south of the Study Area, parallel to the

southern property line. This stream is identified as primary riparian corridor along the drainage. At the time of the site visit, riparian vegetation composed of arroyo willow was identified along the drainage and the edge of riparian vegetation mapped using aerial photographs and a handheld geographic positioning system (GPS) with sub-meter accuracy. This habitat is located outside of the Study Area; however, it is subject to a 50-foot riparian buffer measured from the limit of riparian vegetation. Figure 2 shows the mapped edge of riparian vegetation and associated setback in relation to the Study Area.

A second, unvegetated drainage was identified outside of the Study Area, running parallel to the West Avenue street easement boundary and terminating in the riparian habitat along Montara Creek. This drainage was largely unvegetated and surrounded by Monterey cypress, and containing veldtgrass, common rush, and pampasgrass (*Cortaderia* sp). As this drainage was located on private property, the edge of top of bank and center point of the drainage were photographed and GPS points taken outside of the existing fence line to best approximate the extent of the drainage. This drainage is likely to be considered an intermittent stream under the LCP which will require a 30-foot buffer measured from the drainage midpoint. The non-riparian drainage centerline and associated setback are shown in Figure 2.

# Special-Status Species

# Special-Status Plants

Based upon a review of the resources and databases discussed previously, all special-status plant species documented in the vicinity of the Study Area were assessed. Figure 3 shows special-status plant species documented in the CNDDB (CDFW 2015) to occur within 2 miles of the Study Area. No special-status plant species were observed in the Study Area. Many species requiring certain habitat types not present in the Study Area, such as serpentine endemics and plants requiring coastal bluff or scrub habitats, were determined to have no potential to occur. Of the 27 special-status plant species evaluated, all were determined to have no potential or a low potential to occur based on the high disturbance levels in and around the Study Area and/or a lack of suitable habitat components in the Study Area. While the site visit did not constitute a protocol-level rare plant survey, during the 2015 site visit, no special-status plants were observed.

# San Mateo County Heritage Tree and Significant Tree Ordinances

Pursuant to the County of San Mateo Heritage Tree Ordinance (Ordinance No. 427), madrone, coast live oak, and California bay laurel trees may be subject to regulation under the tree ordinance pursuant to the ordinance. Permits may be required by the County for the trimming or removal of trees which qualify for heritage status under the Ordinance. All trees within the Study Area are Monterey cypress and Monterey pine which are not covered under the San Mateo County Heritage Tree Ordinance; however, some may be considered a "significant tree" which is defined as any tree 38 inches in circumference at 4.5 feet above the ground. Removal of potentially significant trees as part of the proposed Project is anticipated to be considered in permits for the overall Project and is not anticipated to require a separate permit (San Mateo County Ordinance Code, Part 3, Division 8, Section 12,020.1). This assessment did not include an arborist assessment and no tree measurements were taken.

## Special-Status Wildlife Species

Based upon a review of the databases and literature, 39 special-status wildlife species have been documented to occur in the vicinity of the Study Area. Figure 4 shows occurrences documented within 2 miles of the Study Area in the CNDDB (CDFW 2015). Of the 39 special-status wildlife species documented to occur in the vicinity, only two species have a moderate or high potential to occur within the Study Area. No rare, endangered, or unique species as defined by the LCP have potential to occur within the Study Area.

Most species do not have potential to occur because a lack of suitable habitat including no aquatic features and a maintained understory within the Monterey cypress woodland. In addition, no cavities were observed in the trees within the Study Area suitable for cavity nesting bird species such as Nuttall's woodpecker (*Picoides nuttallii*; USFWS Bird of Conservation Concern) and oak titmouse (*Baeolophus inornatus*; USFWS Bird of Conservation Concern). Townsend's big-eared bat (*Corynorhinus townsendii*; State Candidate Species, WBWG High Priority) requires caves or cave-like structures for roosting which are not present within or near the Study Area. Pallid bat (*Antrozous pallidus*; CDFW Species of Special Concern) also typically roosts in crevices and caves, but may roost in trees. However, pallid bat is sensitive to disturbance at roost sites and the proximity to residences reduces the potential for pallid bat to roost in the Study Area. San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*; CDFW Species of Special Concern) may occur in the vicinity of the woodland; however, the understory in the Monterey cypress woodland within Study Area is maintained and no woodrat houses were observed during the July 24, 2015 site visit.

**Olive-sided flycatcher (***Contopus cooperi***), CDFW Species of Special Concern, USFWS Bird of Conservation Concern.** Olive-sided flycatchers typically occur within the coniferous forest biome, where it is most often associated with forest openings, forest edges near natural openings (e.g., meadows, canyons, rivers) or human-made openings (e.g., harvest units), or open to semi-open forest stands (Altman, 2000). Although no olive-sided flycatchers were detected during the site visit on July 24, 2015, the Monterey cypress woodland and adjacent woodland habitats are suitable for this species.

Allen's hummingbird (*Selasphorus sasin*), USFWS Bird of Conservation Concern. Allen's hummingbird, common in many portions of its range, is a summer resident along the majority of California's coast and a year-round resident in portions of coastal southern California and the Channel Islands. Breeding occurs in association with the coastal fog belt, and typical habitats used include coastal scrub, riparian, woodland and forest edges, and eucalyptus and cypress groves (Mitchell 2000). It feeds on nectar, as well as insects and spiders. The Study Area contains suitable nesting habitat, and Allen's hummingbird has a high potential to nest within the trees in the Study Area.

## Impacts and Recommendations

The Study Area has potential to impact two special-status bird species. In addition, most native bird nests are protected under the Migratory Bird Treaty Act. All other sensitive biological communities including riparian habitat are beyond recommended setbacks. Swales and detention basins will treat run-off and avoid impacts to nearby riparian habitats. No rare, endangered, or unique species are anticipated to be impacted by the proposed Project. Recommendations to protect special-status and non-special-status nesting birds are described below.

# Special-status and Non-Special-Status Nesting Birds

Two special-status bird species have potential to nest within the Study Area and trees proposed for removal. In addition, non-special-status native birds may nest in trees within the Study Area. Therefore, the following measures are recommended to avoid impacts to active nests of both special-status and non-special-status bird species:

- Trees proposed for removal should be removed during the bird non-nesting season (September 1 February 14).
- If tree removal or Project activities are initiated during the nesting season (February 15 August 31), a pre-construction nesting bird survey is recommended to avoid impacts to both special-status and non-special-status bird species.
  - If active nests are observed, a qualified biologist will determine suitable buffers based upon nest location and bird species.

# Summary

Based upon a review of databases and a site visit to the Study Area, no sensitive habitats are present within the Study Area. No wetlands or waters are present within the Study Area, and the proposed Project is outside riparian setbacks described in the LCP. Swales and detention basins will treat run-off and avoid impacts to nearby riparian habitats. Avoidance of the bird nesting season or pre-construction surveys for nesting birds are recommended for tree removal activities. No special-status plant species have potential to be present. No further measures are recommended.

Figure 2 (Attachment 1) shows the mapped vegetation communities, riparian habitat, riparian habitat buffer, and buffer along an intermittent stream with no riparian habitat. The Study Area is located outside of required buffers for these areas. Trees within the Study Area consist of Monterey Cypress and scattered pines (*Pinus* sp.). Monterey cypress is a widely planted species and is not considered protected outside of identified native stands within the Monterey Peninsula. The tree species within the Study Area do not qualify as riparian habitat as defined in the LCP.

Please feel free to contact me with any questions you may have.

Sincerely,

Patricia Valcarcel Wildlife Biologist

Enclosures: Attachment A- Figures Attachment B- List of Observed Species Attachment C- Study Area Photographs

#### References

- Altman, B., and R. Sallabanks. 2000. Olive-sided Flycatcher (*Contopus cooperi*). In The Birds of North America, No. 502 (A. Poole and F. Gill, eds.). The Birds of North America, Inc., Philadelphia, PA.
- California Department of Fish and Wildlife (CDFW). 2010. List of Vegetation Alliances and Associations. Vegetation Classification and Mapping Program, California Department of Fish and Game. Sacramento, CA. September.
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- County of San Mateo. 2013. Local Coastal Program. https://planning.smcgov.org/documents/local-coastal-program-lcp. Accessed July 2015.
- Holland, RF. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Prepared for the California Department of Fish and Game, Sacramento, CA.
- Mitchell, D.E. 2000. Allen's Hummingbird (*Selasphorus sasin*), The Birds of North America Online (A Poole, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America Online: <u>http://bna.birds.cornell.edu/bna/species/501</u>
- U.S. Geological Survey (USGS). 2015. Montara Mountain. 7.5 minute topographic map. Available at: <u>http://www.usgsquads.com/index.php</u>. Accessed March 2015.

Attachment A

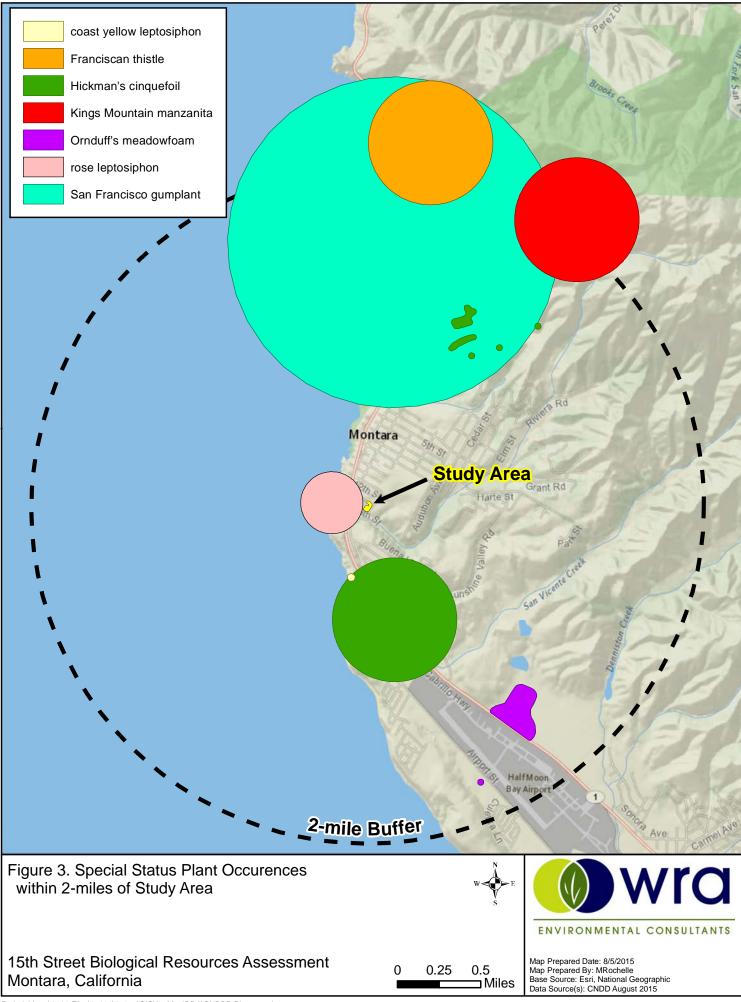
Figures



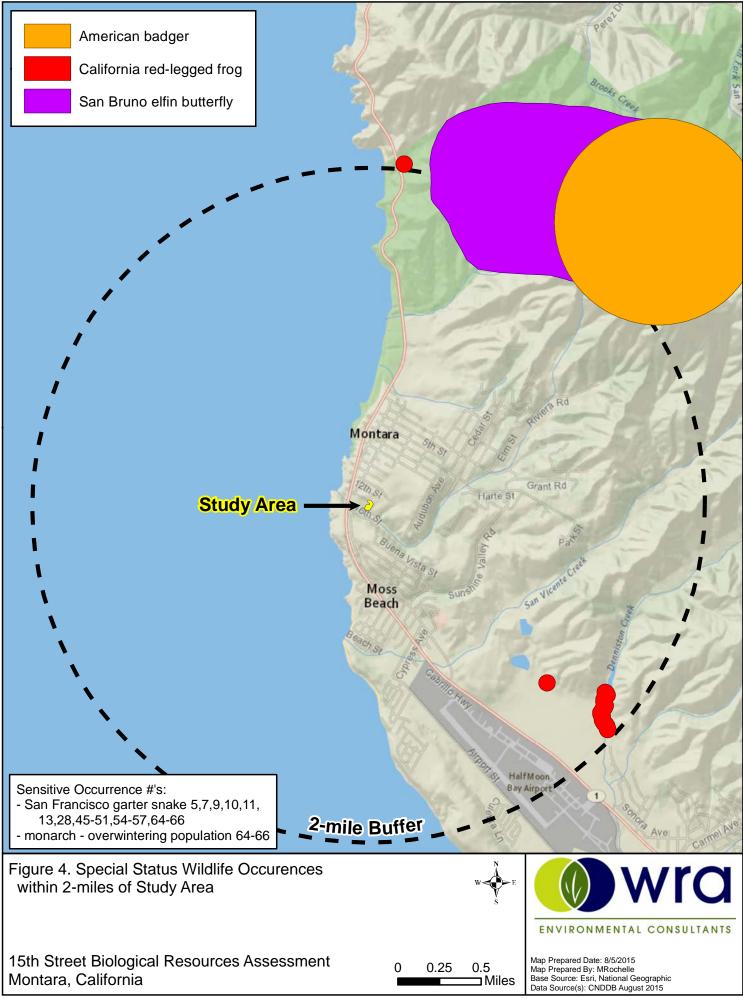
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Attachment B

List of Observed Species

**Attachment B.** Plant and wildlife species observed by WRA biologists during the March 27, 2015 and July 24, 2015 site visits at the Study Area

SCIENTIFIC NAME	COMMON NAME
Birds	
Haemorhous mexicanus	house finch
Corvus brachyrhynchos	American crow
Oreothlypis celata	orange-crowned warbler
Calypte anna	Anna's hummingbird
Junco hyemalis	dark-eyed junco
Zenaida macroura	mourning dove
Poecile rufescens	chestnut-backed chickadee
Sayornis nigricans	black phoebe
Aphelocoma californica	western scrub jay
Melozone crissalis	California towhee
Mammals	
Thomomys bottae	Botta's pocket gopher (mounds)

Family	Scientific name	Common name	Life form	Origin	Invasive Status <sup>1</sup>	Rare Status <sup>2</sup>	Wetland indicator <sup>3</sup>
Alliaceae [Liliaceae]	Allium sp.	tapertip onion	perennial	forb	native		
Anacardiaceae	Toxicodendron diversilobum	poison oak	deciduous	shrub	native		
Blechnaceae	Woodwardia fimbriata	chain fern	perennial	fern	native		
Cupressaceae	Hesperocyparis [Cupressus] macrocarpa	Monterey cypress	evergreen	tree	native	Rank 1B.2*	
Equisetaceae	Equisetum arvense	field horsetail	perennial	fern	native		
Fabaceae	Trifolium dubium	Shamrock clover	annual	forb	non-native		
Fabaceae	Vicia sativa ssp. nigra	garden vetch	annual	forb	non-native		
Geraniaceae	Geranium dissectum	cutleaf geranium	annual	forb	non-native		moderate
Hydrangeaceae [Philadelphaceae]	Philadelphus lewisii	Lewis' mock orange	evergreen	shrub	native		
Iridaceae	Iris douglasiana	Douglas' iris	perennial	forb	native		
Juncaceae	Juncus patens	common rush	perennial	graminoid	native		
Onagraceae	Camissonia sp.	beach suncup	perennial	forb	native		
Oxalidaceae	Oxalis pes-caprae	Bermuda buttercup	perennial	forb	non-native		moderate
Poaceae	Agrostis avenacea	Pacific bentgrass	perennial	graminoid	non-native		limited
Poaceae	Bromus diandrus	ripgut brome	annual	graminoid	non-native		moderate
Poaceae	Ehrharta erecta	panic veldtgrass	perennial	graminoid	non-native		moderate
Rosaceae	Pyracantha angustifolia	narrowleaf firethorn	evergreen	shrub	non-native		limited
Scrophulariaceae [Myoporaceae]	Myoporum laetum	lollypop tree	evergreen	shrub	non-native		moderate

Attachment B. Plant species observed in the Study Area, March 2	7, 2015
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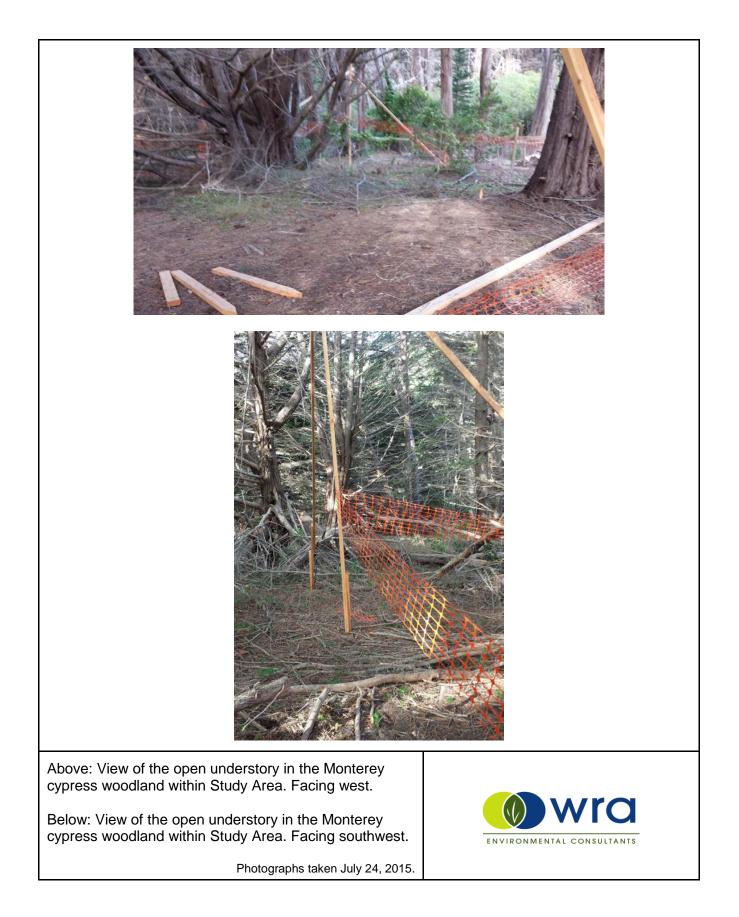
All species identified using the *Jepson Manual, 2<sup>nd</sup> Edition* (Baldwin et al. 2012) and *A Flora of Sonoma County* (Best et al. 1996); nomenclature follows Baldwin et al. 2012 <sup>1</sup>Invasive Status: California Invasive Plant Inventory (Cal-IPC 2006) <sup>2</sup>Rare Status: The CNPS Inventory of Rare and Endangered Plants (CNPS 2015) <sup>3</sup>Wetland Status: National List of Plant Species that Occur in Wetlands, Arid West (Lichvar 2012)

\*This species is only considered to be special status within its native range near Monterey. This species is widespread throughout California and is not considered to be special-status within the Study Area.

Attachment C

Representative Photographs







Below: View of Fourteenth Street terminus and stormwater ditch facing west.



Photographs taken March 27 and July 24, 2015.