



August 7, 2020

Charles Floyd
551 Alsace Lorraine Avenue
Half Moon Bay, CA 94019

RE: Updated Addendum to Biological Resources Assessment Report Dated 2008 and 2015 Update for APN 082-130-250

Dear Mr. Floyd,

The purpose of this letter is to inform you of the results of the biological resource assessment update for an undeveloped parcel (Study Area; APN 082-130-250). The subject APN has been expanded since the previous assessments, and the assessor parcel number (APN) updated to reflect the change (previous reports address APN 082-130-070). Although the APN has changed, the survey area remains unchanged. The purpose of this assessment update was to determine whether existing onsite biological resources have changed since the submittal of the biological resources assessment and update (WRA 2008, WRA 2015) with a focus on changes to the most recent riparian drip line mapping (WRA 2015). This update includes any additional mitigation measures that may be needed as a result of changed conditions.

The previous biological resources assessment (WRA 2008, WRA 2015) and proposed Project plans with the 2011 riparian drip line mapping assessment (WRA 2011) are provided in Attachment A. The riparian dripline mapped during the 2020 site visit is provided as Attachment B.

Survey Methods

A site visit to the Study Area was made on July 27, 2020. 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 (CNDDDB; CDFW 2020)
- California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants (CNPS 2020)
- U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation Report (IPaC; USFWS 2020)
- A biological resources assessment (WRA 2008), 2015 update (WRA 2015) and, riparian canopy assessment (WRA 2011) of the Study Area (Attachment A).

During the site visit, the Study Area was examined for: (a) sensitive natural communities as defined by the CNDDDB and LCP and, (b) for the presence, and potential to support, special status plant and wildlife species. Vegetation within the Study Area south of the road was also evaluated for riparian habitat criteria as defined by the LCP. If present, the dripline or boundary of the riparian vegetation was mapped. The Study Area north of the road was not evaluated for riparian vegetation.

Survey Results

The approximately 2.7-acre Study Area is located on State Route 84 approximately five miles east of State Route 1 in western San Mateo County, and is within the Midcoast LCP area. The Study Area includes and is bounded by San Gregorio Creek to the south and east, and existing residential properties to the west and north. The proposed project includes the construction of a house, and associated access road/ditch crossing, fire department turnaround area, and septic system. The water source for the residence would be a domestic well. The Study Area is dominated by two common vegetation communities: non-native annual grassland and coast live oak woodland; riparian woodland is also present.

Vegetation Communities

As described in the 2008 Biological Resources Assessment (BRA), one vegetation community will be affected by the proposed Project and two additional vegetation communities are present adjacent to the Project footprint. Disturbed non-native annual grassland will be permanently and temporarily disturbed by the construction of a residence and the installation of a septic system. Coast live oak woodland and riparian woodland are present adjacent to the proposed Project and may be impacted if trees are trimmed or removed. The revised parcel boundary contains San Gregorio Creek, a USGS “blue line” perennial stream (USGS 2018), and its associated riparian woodland. San Gregorio Creek and riparian woodland are outside of the proposed project footprint.

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. Within the Study Area, this community dominates the Study Area in open areas and under the oak woodland canopy.

Sensitive vegetation communities

Two sensitive vegetation communities were observed onsite in the 2008, 2011, 2015, and 2020 assessments: coast live oak woodland and riparian woodland. Although most coast live oak woodland vegetation associations are not considered sensitive natural communities by the LCP or the CDFW Natural Communities List (CDFW 2019), including the mixed coast live oak woodland alliance found within the Study Area, oak woodlands are given special consideration under the California Oak Woodland Conservation Act (State of California Resources Agency 2004).

The coast live oak woodland community is dominated by coast live oak (*Quercus agrifolia*), with California buckeye (*Aesculus californica*) and California bay laurel (*Umbellularia californica*) and

madrone (*Arbutus menzesii*) in the canopy. The understory was composed of dogtail grass (*Cynosurus echinatus*), poison oak (*Toxicodendron diversilobum*), woodland strawberry (*Fragaria vesca*), California blackberry (*Rubus ursinus*), and non-native herbs and forbs including cutleaf geranium (*Geranium dissectum*), forget-me-not (*Myosotis latifolia*) and ripgut brome (*Bromus diandrus*).

The LCP Land Use Plan (LUP) defines riparian canopy as vegetation along a perennial or intermittent stream, composed of a minimum of 50 percent of the following species: red alder, jaumea, pickleweed, big leaf maple, narrow-leaf cattail, arroyo willow, broadleaf cattail, horsetail, creek dogwood, black cottonwood, and boxelder. On June 24 and 29, 2011, WRA collected data to map the riparian drip line along San Gregorio Creek in the Study Area. The location of the riparian drip line was measured at 30 locations from the top of bank of San Gregorio Creek. In addition, the tree species was documented at each point. Each point was then plotted on the Hartsell map (see Attachment A, 2011 riparian assessment). The mean distance from the top of bank and drip line was 49 feet; the distance ranged from 10 to 85 feet. The dominant tree cover along the drip line was alder (*Alnus* sp.) (40 percent) and boxelder (*Acer negundo*) (30 percent). The remaining 30 percent consisted of willow (*Salix* sp.), California bay (*Umbellularia californica*), and dogwood (*Cornus* sp.). The understory was dominated by non-natives, including poison hemlock (*Conium maculatum*), thistles (*Carduus* sp.), and stinging nettle (*Urtica* sp.)

The 2020 assessment utilized similar mapping methods and concurred with the previous riparian drip line assessment. No encroachment of the riparian drip line was observed. Along the south and east Study Area boundaries, dense riparian canopy dominated by alder, boxelder, and arroyo willow was observed. The understory was dominated by California blackberry, poison oak, poison hemlock, Cape ivy (*Delairea odorata*), sticky willy (*Galium aparine*), and stinging nettle (*Urtica dioica*) with scattered elderberry (*Sambucus nigra*). Although poison hemlock, California blackberry and Cape ivy are facultative wetland indicators, this area was located in an area which slopes gently toward the riparian corridor on the southern property line and was intermixed with upland species not commonly found in wetlands, with no other hydrologic sources observed. These species are disturbance-adapted and tend to occur on berms, roadsides, and other disturbed upland locations. Accordingly, this vegetation is more adequately protected by the riparian vegetation definition and is included in this vegetation community.

Wetland and Waters features

San Gregorio Creek is a perennial stream within the Study Area. The creek was not part of the previous assessments but is now part of the expanded parcel. The creek ranges from eight to 15-feet wide and is within a well-defined channel. A floodplain on the creek ranges from 30 to 150 feet-wide. Within the Study Area, San Gregorio Creek flows north to south. During the time of the July 2020 site visit, water was observed flowing in the creek. The LCP has established a 50-foot buffer zone for perennial creek systems. Per Section 7.11a of the LCP for perennial streams, if riparian vegetation is present, a buffer extends 50 feet from the limit or dripline of the riparian vegetation. The dripline of riparian vegetation was mapped during the July 2020 site visit and is shown on Attachment B along with the approximate 50-foot setback. San Gregorio Creek is considered sensitive by the LCP and CDFW.

One ditch was observed during the 2008, 2015, and 2020 biological resource assessments, contiguous with the northern property line. At the time of the 2020 site assessment, this feature contained standing water. The ditch feature ranges from two to four feet wide and incised to approximately three feet deep, contains large amounts of fallen trees and branches, and is largely unvegetated in the bottom and sides. The ditch is surrounded by poison oak, coast live oak, and

a sparse arroyo willow. The access bridge and driveway improvements are the only proposed work in and near the ditch. The ditch is man-made in upland habitat and therefore, not considered a sensitive community. No wetlands were observed on-site.

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. Although the site visit did not constitute a protocol-level rare plant survey, the July 2020 site visit coincided with the blooming period for five special-status species identified in the Study Area region including Blasdale's bent grass (*Agrostis blasdalei*), Francisco Bay spineflower (*Chorizanthe cuspidata* var. *cuspidata*), San Francisco gumplant (*Grindelia hirsuta* var. *maritima*), Kellogg's horkelia (*Horkelia cuneata* ssp. *sericea*), and Hickman's cinquefoil (*Potentilla hickmanii*). No special-status plant species were observed in the Study Area.

San Mateo County Heritage Tree Ordinance

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. This update did not include an evaluation or update of an existing tree survey.

Special-Status Wildlife Species

Four wildlife species were identified in the 2008 BRA as either present or having a moderate potential to occur: San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), Cooper's hawk (*Accipiter cooperi*), olive-sided flycatcher (*Contopus cooperi*), and yellow warbler (*Setophaga [Dendroica] petechia*). The 2015 BRA provided an update to status for Cooper's hawk, Townsend's big-eared bat (*Corynorhinus townsendii*), and California red-legged frog (*Rana draytonii*; Federal threatened, CDFW Species of Special Concern) designation of critical habitat (USFWS 2010). Since 2015, additional changes to status have occurred: Townsend's big-eared bat is no longer a candidate species for listing under the California Endangered Species Act (CESA), although it remains a special-status species. Foothill yellow-legged frog (*Rana boylei*; State endangered) in the central coast are now listed as endangered under CESA, and mountain lion (*Puma concolor*; State candidate) in the central coast are a candidate for listing under CESA.

The expansion of the Study Area to include San Gregorio Creek does add stream-associated species as potential to occur within the Study Area. These species are foothill yellow-legged frog, steelhead (*Oncorhynchus mykiss irideus*; Federal threatened), and steelhead designated critical habitat. Both species and steelhead critical habitat only have potential to be present within San Gregorio Creek and do not have potential to be present in upland habitats within the proposed Project footprint. These species are discussed further below. This assessment concurs with previous determinations for San Francisco dusky-footed woodrat, California red-legged frog, and special-status bird species. No revisions to previous measures or determinations for those species are recommended.

Mountain lion is a rarely seen and uncommon cat, yet it is the most widely distributed cat in the Western Hemisphere, ranging from Chile to British Columbia, and adapting to virtually any habitat

that contains its primary prey sources of deer and other large mammals. It can be active night or day, but typically is nocturnal near human development. Dens are well-hidden and usually concealed by thick vegetation. Adults are solitary and territorial (Reid 2006). Mountain lion are known to occur in the region of the Study Area; however, the Study Area does not contain typical characteristics of den sites or other primary habitat characteristics to reside or regularly occur within the Study Area. This species is not likely to occur within the Study Area, and no additional measures are recommended.

Foothill yellow-legged frog historically occurred in coastal and mountain streams from southern Oregon to Los Angeles County, but has declined in many parts of this range. This species is strongly associated with rivers and creeks, and prefers shallow, flowing water with a rocky substrate. Individuals do not typically move overland and are rarely observed far from a source of permanent water. In northern California, it was observed adults were on average within ten feet and rarely over 40 feet from the stream (Bourque 2008), and the data suggest that movements away from water are related to flood events (Kupferberg 1996, Bourque 2008, Thomson et al. 2016). Aquatic breeding sites are often near stream confluences, with egg masses typically deposited behind or sometimes under rocks in low-flow areas with cobble and/or gravel (Thomson et al. 2016). This species is historically known within San Gregorio Creek (CDFW 2020), and is presumed present as the creek still maintains perennial flows. Although foothill yellow-legged frog is presumed present in San Gregorio Creek, it is not likely to be present in upland habitats such as those within the proposed Project footprint. Measures to protect the riparian habitat, including LCP riparian setbacks are considered sufficient to protect foothill yellow-legged frog. No additional measures are recommended.

The Central California Coast Distinct Population Segment (DPS) of steelhead includes all naturally spawned populations of steelhead (and their progeny) in California streams from the Russian River to Aptos Creek, and the drainages of San Francisco and San Pablo Bays eastward to the Napa River (inclusive), excluding the Sacramento-San Joaquin River Basin. Steelhead typically migrate to marine waters after spending two years in freshwater, though they may stay up to seven. They then reside in marine waters for 2 or 3 years prior to returning to their natal stream to spawn as 4-or 5-year-olds. Steelhead adults typically spawn between December and June. In California, females typically spawn two times before they die. Preferred spawning habitat for steelhead is in perennial streams with cool to cold water temperatures, high dissolved oxygen levels and fast flowing water. Abundant riffle areas (shallow areas with gravel or cobble substrate) for spawning and deeper pools with sufficient riparian cover for rearing are necessary for successful breeding. Steelhead are known to occur in San Gregorio Creek and this creek is designated critical habitat (NMFS 2005). This species is presumed present within San Gregorio Creek in the Study Area, but is not present within the proposed Project footprint. Measures to protect the riparian habitat, including LCP riparian setbacks are considered sufficient to protect steelhead and its critical habitat. No further measures are recommended.

Summary

Based upon a review of previous biological reports for the proposed Project and a site visit conducted on July 27, 2020, no additional measures are recommended at this time. Conditions remain similar to those described in the 2008 BRA and 2015 BRA, and although the status of some plant and wildlife species has changed, no additional special-status species have the potential to be present within the proposed Project footprint. In addition, the riparian drip line has not changed and the proposed Project footprint remains outside of setbacks outlined in the LCP. San Gregorio Creek is located within the Study Area; however, the creek and associated riparian vegetation are outside the limits of the proposed Project. Per the LCP, a 50-setback from the limit

of riparian vegetation is recommended (Attachment B). No wetlands are present within the Study Area. The pre-construction surveys for San Francisco dusky-footed woodrat and nesting birds recommended in the 2008 BRA remain relevant and implementation of these measures will avoid impacts to sensitive resources and species. No additional measures are recommended.

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

Sincerely,



Patricia Valcarcel, CWB
Senior Biologist

Enclosures: Attachment A - Previous Reports: WRA 2015, WRA 2008, WRA 2011
Attachment B - Map of Riparian Vegetation Limits in the Study Area

References

- Bourque, R.M. 2008. Spatial ecology of an inland population of the foothill yellow-legged frog (*Rana boylei*) in Tehama County, California. Master's thesis, Humboldt State University, Arcata, CA.
- California Department of Fish and Wildlife (CDFW). 2019. California Natural Community List. Biogeographic Data Branch. Vegetation Classification and Mapping Program, Sacramento, CA. November 8
- California Department of Fish and Wildlife (CDFW). 2020. California Natural Diversity Database. Wildlife and Habitat Data Analysis Branch, Sacramento. Most recently accessed July 2020.
- California Native Plant Society (CNPS). 2020. Inventory of Rare and Endangered Plants (online edition, v8-02). Sacramento, California. Online at: <http://vegetation.cnps.org/>; Most recently accessed: July 2020.
- Holland, RF. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Prepared for the California Department of Fish and Game, Sacramento, CA.
- Kupferberg, S.J. 1996. Hydrologic and geomorphic factors affecting conservation of a river-breeding frog (*Rana boylei*). *Ecological Applications* 6:1332-1344.

- National Marine Fisheries Service (NMFS). 2005. Endangered and Threatened Species; Designation of Critical Habitat for Seven Evolutionarily Significant Units of Pacific Salmon and Steelhead in California. National Oceanic and Atmospheric Administration. Federal Register 70:52488-52586.
- Reid, FA. 2006. Mammals of North America. New York: Houghton Mifflin Company.
- State of California Resources Agency. 2004. Oak Woodlands Conservation Act. Online at: http://www.leginfo.ca.gov/pub/03-04/bill/sen/sb_1301_1350/sb_1334_bill_20040924_chaptered.html
- Thomson, R.C., Wright, A.N., Shaffer, H.B. 2016. California Amphibian and Reptile Species of Special Concern. University of California Press and California Department of Fish and Wildlife. California.
- United States Fish and Wildlife Service (USFWS). 2010. Endangered and Threatened Wildlife and Plants: Revised Designation of Critical Habitat for California Red-legged Frog; Final Rule. Federal Register, Vol. 75, No. 51. 12815-12959.
- United States Fish and Wildlife Service (USFWS). 2020. Information for Planning and Conservation Report (IPaC). Sacramento Fish and Wildlife Office. Online at: <http://www.fws.gov/sacramento>. Most recently accessed: August 2020.
- United States Geological Survey (USGS). 2018. La Honda Quadrangle, California, San Mateo County, 7.5-minute Series.
- WRA, Inc. 2008. Biological Impact Form for Compliance with Local Coastal Program Policy 7.5. Prepared for Charles Floyd.
- WRA, Inc. 2011. Riparian Drip Line Mapping. June 30, 2011.
- WRA, Inc. 2015. Updated Addendum to Biological Resources Assessment Report Dated 2008 for APN 058-130-070.