

**VILLAGE AT THE PALMS, SAN LUIS OBISPO,
SAN LUIS OBISPO COUNTY, CALIFORNIA**
(Assessor's Parcel Number 052-162-021)

BIOLOGICAL RESOURCES ASSESSMENT



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EXECUTIVE SUMMARY

Kevin Merk Associates, LLC (KMA) conducted this biological resources assessment (BRA) for the proposed expansion of an existing Assisted Living housing and related services within an approximately two-acre study area at 55 Broad Street, San Luis Obispo, San Luis Obispo County, California. The property is identified as Assessor's Parcel Number (APN) 052-162-021, and zoned Residential Care Facility (R-4 PD). The proposed project involves the construction of two new buildings and associated infrastructure.

The purpose of this assessment was to assist the project proponent with technical biological resources information to support the City of San Luis Obispo's (City) environmental review. This report evaluates the potential for the subject property to support special-status biological resources, and whether these resources could be adversely affected by the proposed project. A desktop review of available background information on special-status biological resources in the project vicinity was used for this analysis coupled with a field survey in February 2021.

Three plant communities or land use types were identified within the study area, and include: 1) Ornamental; 2) Developed/Ruderal; and 3) Riparian. A prominent feature of the property is the segment of Old Garden Creek lined by Riparian forest that traverses the site. The stream originates on the northern slope of Cerro San Luis a short distance from the property, and is a tributary to San Luis Obispo Creek. The Riparian habitat had a mixture of native coast live oak and willows along with a variety of non-native ornamental species that had become established or were intentionally planted. The Riparian habitat is considered to be a sensitive natural community by the California Department of Fish and Wildlife (CDFW) and a sensitive resource by the City. The project as proposed will avoid the creek corridor and associated riparian habitat.

The background review and site survey determined that one special-status plant species had potential to occur within the property, and was observed during the survey. Several southern California black walnut (*Juglans californica*; California Rare Plant Rank [CRPR] 4.2) trees (mostly young specimens) were found in five locations along the creek corridor. The project is setback from the creek's riparian habitat and these five young trees would not be affected during construction or occupation of the proposed project.

Numerous special status wildlife were considered to have potential to occur on the property. No fish species could occur because the onsite drainage is too ephemeral to support fish. The property occurs in designated critical habitat for the California red-legged frog (*Rana draytonii*), but the drainage is too ephemeral to support aquatic habitat of this species, and the site is separated by dense urban development from any recorded occurrences. As such, the creek and its associated riparian habitat were determined to not provide suitable habitat for the species. The creek corridor running through the project site was determined to have potential to support the northern California legless lizard (*Anniella pulchra*), and trees in the project site could provide seasonal habitat for protected nesting birds and roosting bats. The project will avoid the creek corridor and any potentially suitable habitat for the legless lizard. The project description was also developed to avoid impacts to nesting birds by including biological surveys and monitoring should construction commence during the nesting bird season (February 1 through August 31). As an additional approach to avoid impacts to the creek corridor and riparian habitat, protective fencing, an erosion and sediment control plan and compliance with the City's stormwater control requirements would also be part of the project. A Worker Environmental Awareness Program to be developed and provided by a qualified biologist will also help avoid impacts to the creek corridor and wildlife during construction.

The proposed project would occur in the Developed/Ruderal and Ornamental land uses associated with an existing development, and these areas do not represent significant value to wildlife. A development setback along the creek corridor has been designated from the top of bank or edge of riparian, whichever is farther. Grading and surface disturbance are proposed to occur on existing pavement of parking lots and will be sited beyond the creek's top of bank. Even though some development may encroach into the City of San Luis Obispo's creek setback, no direct impacts to the creek or its associated riparian habitat will occur. In addition, no new drainage outfalls are proposed and underground stormwater treatment/retention areas are planned for the proposed project.

The creek is expected to fall under the jurisdiction of U.S. Army Corps of Engineers under Section 404 of the Clean Water Act; Regional Water Quality Control Board under Section 401 of the Clean Water Act and Porter-Cologne Water Quality Control Act; and, CDFW pursuant to California Fish and Game Code Sections 1600 et seq. While no work is proposed to occur within these agencies jurisdictional areas, should any work be conducted in the creek area, notification and potential permitting from these agencies would be required.

The project will be sited primarily in existing parking lots on the site, and will reduce impervious surfaces on the site. Landscaping and ornamental areas may be disturbed where they are immediate adjacent to existing parking lots to construct the project. In compliance with the City Municipal Code for Tree Removal 12.24.090 any trees meeting the size threshold and species requirements would need to be replaced at a 1:1 ratio. The conceptual landscape plan prepared by the applicant would cover the techniques and monitoring methods to replace any removed trees that may be needed in compliance with City-required tree planting. In addition, native plantings would be sited within the creek setback zone along with appropriate maintenance and management. It is expected that any additional tree planting required to meet City policies from removal or transplanting onsite trees will be incorporated into the landscaping and creek setback zone. The project proposes to prevent indirect effects of stormwater runoff from construction areas on the creek corridor, riparian habitat and downstream aquatic areas, by implementing standard Best Management Practices (BMPs) and conducting biological monitoring of site disturbance activities that are in close proximity to the creek corridor to avoid impacts to nesting birds. Temporarily disturbed areas in the creek setback zone would be planted with native species, and as appropriate, a native seed mix (or another approved city method such as mulching) would be utilized to stabilize these areas while landscaping becomes established.

The proposed project did not trigger any of the criteria that would meet a mandatory finding of significance under the California Environmental Quality Act (CEQA). Given the project is proposed in existing disturbed areas, reduces impervious areas, protects the creek through city-approved erosion control and stormwater control measures, and includes protection measures to avoid impacts to nesting birds and bats through pre-activity biological surveys/monitoring, no mitigation measures are required to reduce project effects below a level of significance pursuant to the California Environmental Quality Act.

1.0 INTRODUCTION

Kevin Merk Associates, LLC (KMA) conducted this biological resources assessment (BRA) for a proposed expansion of an existing Assisted Living housing and related services within an approximately two-acre study area at 55 Broad Street, San Luis Obispo, San Luis Obispo County, California. The property is identified as Assessor's Parcel Number (APN) 052-162-021, and zoned Residential Care Facility (R-4 PD). The project is located 0.3 mile to the southwest of the intersection of Santa Rosa Street and Foothill Boulevard, within the Urban Reserve Limits of the City of San Luis Obispo (Figure 1). It is on the U. S. Geological Survey (USGS) San Luis Obispo 7.5-minute topographic quadrangle (T 30 S, R 12 E, southeast corner of the northwest corner of Section 27; 35.2940641°N, 120.6679656°W). The property is situated in an existing developed area within the City of San Luis Obispo (Figure 2). Dense urban development surrounds the property on all sides, and the project would be constructed in existing parking lots.

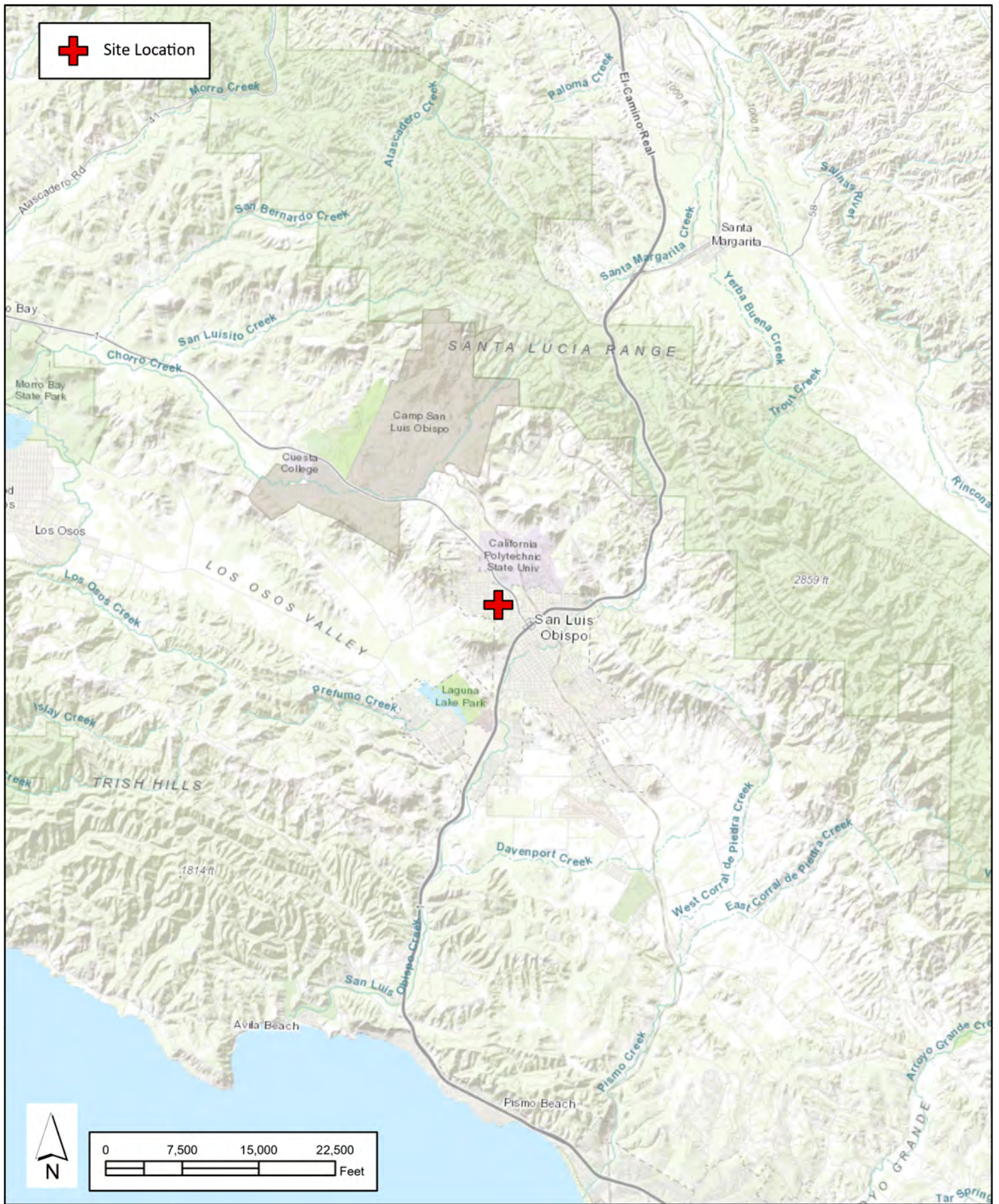
The purpose of this assessment is to assist the project proponent with technical biological resources information to support the application for a proposed expansion of existing Assisted Living housing and related services. This report evaluates the potential for the project site to support special-status biological resources (plants, animals, sensitive natural communities, and designated critical habitat) for the California Environmental Quality Act (CEQA) review to be conducted by the City of San Luis Obispo (City) for the project. This BRA evaluated the site's existing natural conditions to determine whether special-status biological resources may be present onsite and could be adversely affected by the proposed project.

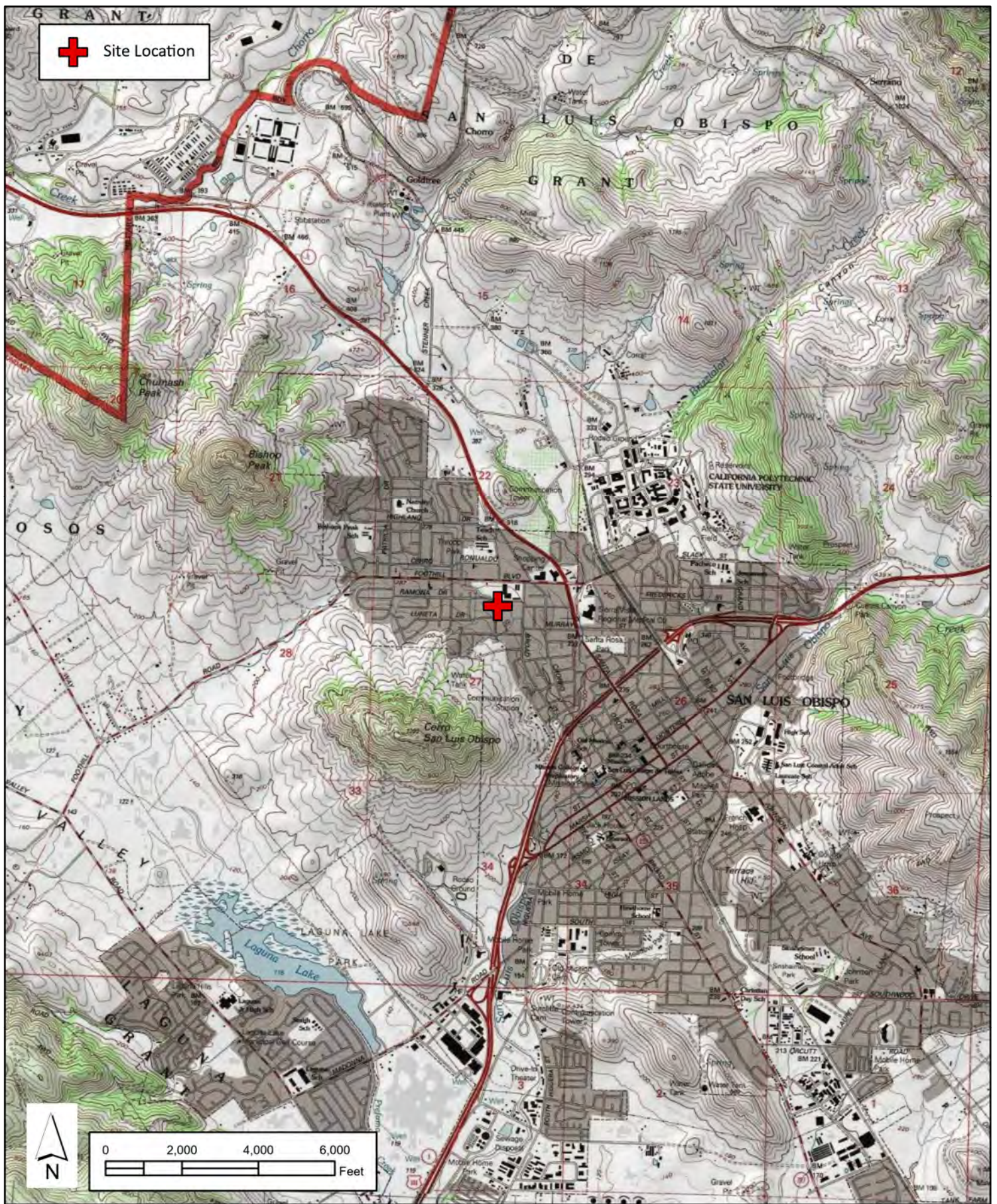
1.1 Project Description

The Village at The Palms is an existing Residential Care Facility for the Elderly (RCFE) that provides a range of housing and services for the elderly population of San Luis Obispo, including Independent Senior Living, Assisted Living (including Memory Care), and Skilled Nursing. The proposed project is intended to meet the growing need within the community for additional Assisted Living housing and services. Adjacent uses include the existing senior housing campus to the east, multi-family and student housing to the west across Palomar Avenue, a commercial retail center, and the parking lot and land associated with The Church of Latter Day Saints to the north across Ramona Drive.

The project will provide various amenities and programs intended to promote social interaction, wellness and fitness, and group activities featuring art and music and access to the outdoors. In lieu of the current land use that is predominantly paved parking adjacent to the existing creek, the proposed development consolidates parking and will allow the new structures and associated outdoor patios and terraces meaningful visual access to the creek side environment. "Building A" includes a kitchen that will provide residents with a variety of food and meal choices and customized menus to meet specific nutritional needs of residents.

The individual studio, one-bedroom, and two-bedroom accommodations reflect the current expectations of assisted living residents to live in a "residential setting" with nicely sized bedrooms, living spaces that allow for a variety of furniture layouts, bathrooms that meet all current accessibility and licensing standards, as well as +9 ft. ceiling heights which will allow windows with maximum natural daylight and opportunities for natural ventilation.





Village at the Palms

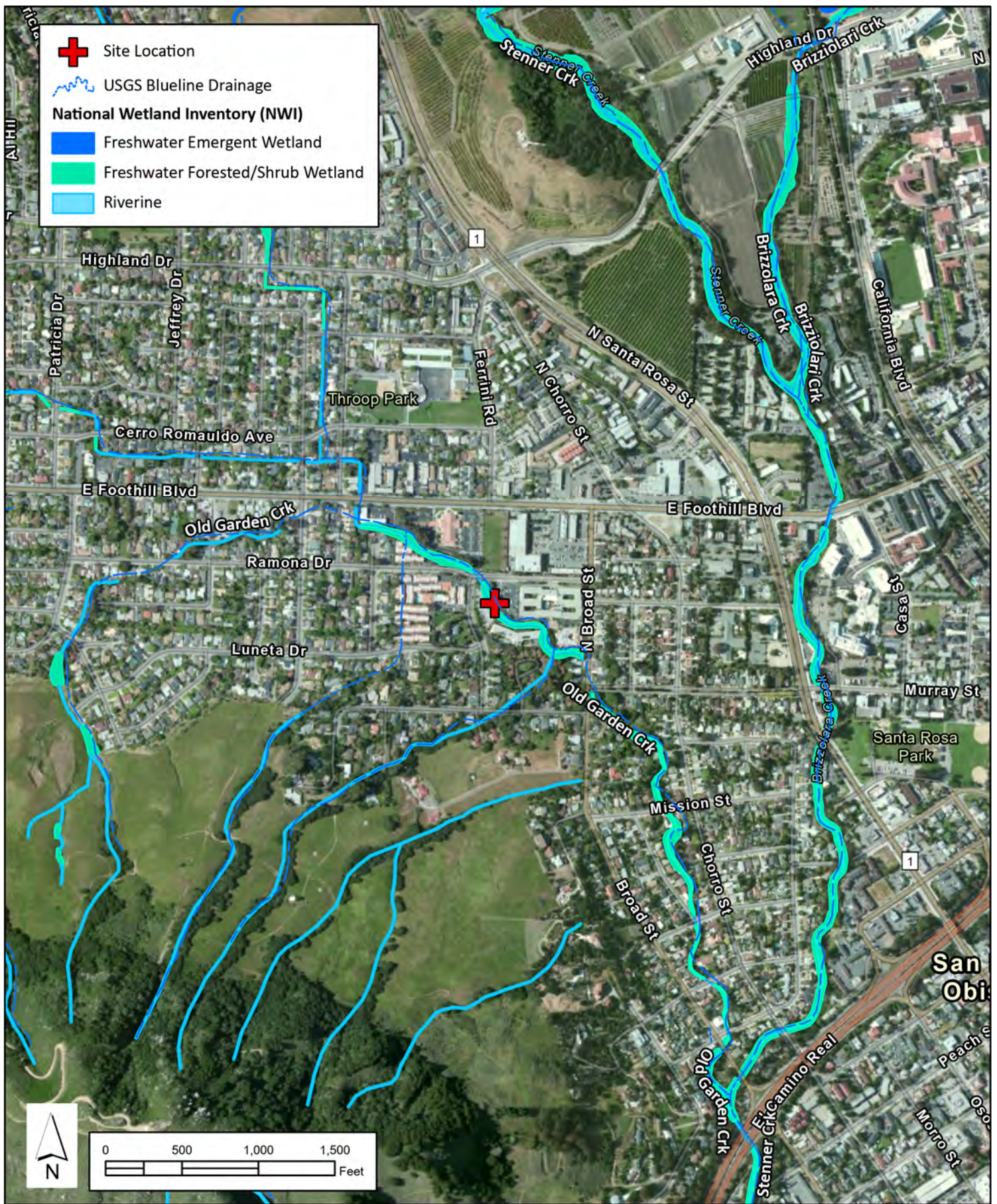
Morrison I, LP

Figure 2

USGS QUAD Map



February 17, 2021



The building designs reflects a more traditional “Spanish style” architecture that includes clay tile roofs, smooth plaster finish walls, decorative tile insets, ornamental wrought iron planters, and a variety of arched openings. The buildings incorporate a significant number of horizontal breaks in the building plane which helps frame the courtyards/patios and create a residential scale articulation.. In addition to the clay tile roofs, both buildings have substantial recessed flat roof areas behind the mansard roofs for the location and visual concealment of mechanical equipment, plumbing vents, exhaust fans, and potential solar panels. “Building A” incorporates an arrival porte-couchere that provides a meaningful drop-off / arrival feature that also complies with Fire Department vertical clearances.

The main lobby for “Building B” incorporates a pedestrian courtyard that provides access to both a permeable creek side walkway and the existing pedestrian bridge. The pedestrian bridge will be modified to meet ADA standards, and in doing so, will serve as a meaningful pedestrian connection between the two new buildings and the overall existing campus. “Building B” also incorporates an automated parking system for a portion of the underbuilding parking, which, by its very nature, allows less of the site to be totally dedicated to surface parking.

The landscape character will be consistent with the existing landscape at the Palms. Existing trees and palm trees, and the riparian plants of the creek corridor, will be preserved and enhanced. City of San Luis Obispo planning documents, such as the “Water Efficient Landscape Ordinance (WELo)” and “Street Tree Master List,” have been consulted to meet city goals. Trees and shrubs are selected to highlight building entries, compliment building scale and screen less interesting site features such as trash enclosures and utilities. Trees and shrubs are selected to enhance microclimate conditions such as providing parking lot shade and shading outdoor gathering areas. Plants are selected for drought-tolerance and to provide a variety of forms, leaf color and texture, and flower color to create variety and interest throughout the year, especially where adjacent to pedestrian pathways and gathering areas.

The two proposed buildings will be licensed as part of the existing Continuing Care Retirement Community (CCRC), and “Building A” will be further licensed as a RCFE. Upon the granting of entitlements, The Village at The Palms intends to commence Construction Documents and file plans for obtaining Building Permits. Construction will be done in two phases, with “Building B” as the first phase and “Building A” to follow immediately upon completion of “Building B”. Construction is anticipated to last approximately 18 months for each phase of work.

1.2 Regulatory Overview

For the purpose of this report, special-status species are those plants and animals listed, or Candidates for listing, as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the federal Endangered Species Act (FESA); those listed as Threatened or Endangered under the California Endangered Species Act (CESA); animals designated as “Species of Special Concern,” “Fully Protected,” or “Watch List” by the California Department of Fish and Wildlife (CDFW; 2021); plants considered Endangered or Rare under the California Native Plant Protection Act; and, animals considered sensitive that do not have a specific listing status but which are recorded in the California Natural Diversity Database (CNDDDB; CDFW 2021a).

FESA provisions protect federally listed species and their habitats from unlawful take, which is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any of the specifically enumerated conduct.” Under these regulations, “harm” may

include significant habitat modification or degradation that kills or injures wildlife. Candidate species are not afforded legal protection under FESA; however, Candidate species typically receive special attention during the CEQA environmental review process. CESA provides for the protection and preservation of native species of plants and animals that are experiencing a significant decline which if not halted would lead to a threatened or endangered designation. Habitat degradation or modification is not expressly included in the definition of take under CESA.

CDFW maintains a list of Species of Special Concern for those species in which declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction. The goal of designating species as special concern is to halt or reverse their decline early enough to secure their long-term viability. Species of Special Concern may receive special attention during environmental review, but do not have statutory protection. FESA and CESA emphasize early consultation to avoid impacts on Threatened and Endangered species. As part of the consultation process, project proponents are directed to develop appropriate mitigation plans to offset project effects on listed species and their habitats.

Sensitive natural communities are those native plant communities listed in the CNDDDB (CDFW 2021a) as rare or of limited distribution. They are evaluated using NatureServe's Heritage Methodology to assign global and state ranks based on rarity and threat, and these ranks are reviewed and adopted by CDFW's (2020b) *Vegetation Classification and Mapping Program* (VegCAMP). Evaluation with the state (S) level results in ranks ranging from 1 (very rare or threatened) to 5 (demonstrably secure). Those with ranks of S1 to S3 are to be addressed in the environmental review process under CEQA (CDFW 2021b).

Critical habitat is designated for species listed under FESA, and are areas that contain the physical or biological features which are essential to the conservation of those species and may need special management or protection. Critical habitat designations affect only federal agency actions or federally funded or permitted activities. Activities by private landowners are not affected if there is no federal nexus.

Rare plants are those defined as occurring on California Rare Plant Rank (CRPR) 1A, 1B, 2A, 2B, 3 and 4 developed by the CDFW working in concert with the California Native Plant Society (CNPS; CDFW 2021c). Rank 4 species are a watch list, and typically do not meet CEQA's rarity definition (Section 15380), but are included here because they may be of local concern. The CRPR definitions are as follows:

- *Rank 1A: Presumed extirpated in California and either rare or extinct elsewhere.* These species are presumed extirpated because they have not been recorded in the wild in California for many years.
- *Rank 1B: Rare, threatened or endangered in California and elsewhere.* Plants that are rare throughout their range and the majority in this rank are endemic to California.
- *Rank 2A: Presumed extirpated in California, but more common elsewhere.* These species are presumed extirpated because they have not been recorded in the wild in California for many years, but they are common outside of the state.
- *Rank 2B: Rare, threatened or endangered in California, but more common elsewhere.* Plants that have ranges that extend into California, where they are rare, but are common in areas outside of the state.

- *Rank 3: Plants needing more information - A review list.* Information necessary to assign the species to one of the lists or reject them is lacking. Most species in this rank are taxonomically unresolved.
- *Rank 4: Plants of limited distribution - A watch list.* Species of limited distribution or infrequent occurrence throughout their range in California but which their vulnerability to extirpation appears low at this time and should be monitored.

Additionally, the CRPR system further assigns threat codes as a decimal extension to the rank, ranging from 1 to 3. CRPR 3 species do not have a threat code due to insufficiency of information needed to assign it, and CRPR 1A and 2A also do not have threat codes because they not know to currently occur in California. The threat code extensions are as follows:

- *.1: Seriously threatened in California.* More than 80% of occurrences are threatened and there is high degree and immediacy of threat.
- *.2: Moderately threatened in California.* Approximately 20 to 80% of occurrences are threatened and there is a moderate degree of immediacy of threat.
- *.3: Not very threatened in California.* Less than 20% of occurrences are threatened and there is a low degree and immediacy of threat, or no current threats are known.

Raptors (e.g., eagles, hawks, and owls) and their nests are protected under both federal and state regulations. Birds of prey are protected in California under the California Fish and Game (2001) Code Section 3503.5. Disturbance that causes nest abandonment or loss of reproductive effort is considered take by CDFW. Eagles are protected under the Bald and Golden Eagle Protection Act. The federal Migratory Bird Treaty Act (MBTA) applies to many bird species, including common species, and prohibits killing, possessing, or trading in migratory birds, including whole birds, parts of birds, bird nests, and eggs. The act restricts construction disturbance during the nesting season that could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment.

The City of San Luis Obispo Municipal Code for Tree Removal 12.24.090 discourages the removal of healthy trees that present no threat to people or property, and requires a permit for tree removal. For properties zoned R-4, as in the case of the subject property, a tree removal permit is not needed if all of the following conditions exist:

- The tree is a designated native species and the trunk is less than ten inches in diameter as measured at standard height (4' 6" from the ground), or for non-native species the trunk is less than twenty inches in diameter; and
- The tree is not located in a creek setback area; and
- The tree is not a designated street tree, and is not located within ten feet of the back of the sidewalk; and
- Planting or retention of the tree was not a condition of development; or
- The tree is a palm and the trunk is less than twelve inches in diameter.

Issuance of tree removal permits from the City require a site plan showing the location, species and size of any tree proposed for removal, with the trees uniquely identified by number. Information must be provided supporting the reason for tree removal, including photographs or diagrams. A

replanting plan shall also be prepared detailing compensatory tree planting with the size, location and species of trees to be planted. The application may also require an arborist report, site plan showing the drip line of each tree, and site-specific tree protection plan for trees that would remain.

CEQA defines a *significant effect on the environment* as “a substantial, or potentially substantial, adverse change in the environment.” Projects that may have significant effects are required to be analyzed in an Environmental Impact Report (EIR). Under CEQA, a project’s effects on biotic resources are deemed significant where the project would do any of the following:

- Potentially substantially degrade the quality of the environment;
- Substantially reduce the habitat of a fish or wildlife species;
- Cause a fish or wildlife population to drop below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Substantially reduce the number or restrict the range of an endangered, threatened, or rare species; or,
- Have possible environmental effects that are individually limited but cumulatively considerable.

In addition to the criteria above that trigger mandatory findings of significance, Appendix G of the CEQA Guidelines includes six additional impacts to consider when analyzing the significance of project effects, which may or may not be significant, depending on the level of impact. A project’s effects on biological resources could be deemed significant if the project would do the following:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by CDFW or USFWS.
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

If the project proponent agrees to mitigation measures or project modifications that would avoid all significant effects or would mitigate the significant effect(s) to a point below the level of significance, an EIR would not be required. The project proponent has incorporated specific measures to protect biological resources onsite as part of the proposed project description, which could allow a CEQA exemption for the project. The applicant would be bound to implement these measures to avoid and minimize project effects to below a level of significance. Mitigation is not required for effects that are less than significant.

2.0 METHODS

2.1 Biological Resources Assessment

Google Earth and other publicly available aerial imagery was employed in coordination with a field survey to define the current extent of onsite plant communities and assist in identifying potential habitat for special-status species. KMA's Principal Biologist Kevin B. Merk conducted a reconnaissance survey of the entire property, which was considered to be the study area for this investigation on February 8, 2021. This survey was conducted between 1000 and 1130 hours, and weather conditions were mostly clear with partial high clouds/marine layer, no wind and air temperature was 48°F. The site was accessed from existing roadways, and the survey was conducted by walking and visually inspecting all portions of the study area. All plant and wildlife species observed during the survey were recorded (Appendix B). Habitat types were mapped on aerial imagery, and dominant plant species in each habitat type were determined (Figure 4). Plant taxonomy followed the Jepson Flora Project (2021), and nomenclature for animals is reported as it appears in the CNDDDB (CDFW 2021a) or as updates are available (California Herps 2021). Plant communities and land use types were mapped on ESRI (2021) aerial imagery. Classification of the onsite plant communities was based on Holland's (1986) *Preliminary Descriptions of the Terrestrial Natural Communities of California* and the CDFW's (2021b) *Vegetation Classification and Mapping Program*, which generally follows Sawyer et al.'s (2009) *Manual of California Vegetation. A Guide to Wildlife Habitats in California*, which is updated through the California Wildlife Habitat Relationships (CWHHR) System (CDFW 2021d), was also cross-referenced. Representative photographs of each of the habitat types within the study area are provided in a photo plate (Appendix C).

The *Web Soil Survey* (Natural Resources Conservation Service [NRCS] 2020) was used to identify the soil mapping units present within the study area. The *National Wetlands Inventory* (NWI) was examined to evaluate the extent of any identified wetlands on the site and in the vicinity (USFWS 2021a). USGS topographic maps were also reviewed for information on hydrologic and topographic features. Designated critical habitat for species listed under FESA was identified and mapped based upon information provided in *Environmental Conservation Online System* (USFWS 2021b).

The CNDDDB (CDFW 2021a) was queried for special-status plant and animal species occurrences and sensitive natural communities within a five-mile buffer of the study area. For each of the special-status species in the 5-mile CNDDDB search, local distribution and ecological information was obtained from a variety of online and published sources (Hoover 1970, Jennings and Hayes 1994, Bolster 1998, Moyle et al. 2015, Thompson et al. 2016, Audubon 2021, Calflora 2021, California Native Plant Society 2021a, California Herps 2021, The Cornell Lab of Ornithology 2021a, 2021b; CDFW 2021d). Those species that occur within the San Luis Obispo and Chorro Creek watersheds, as well as each species recorded in the CNDDDB within five miles, were considered to be within the project vicinity (Appendix E). Other species from the 5-mile search that have limited distributions that do not include the subject area and/or are restricted to higher elevations in the Santa Lucia Range, immediate coastline and beaches, and areas north of Cuesta Grade were considered to be outside of the project vicinity. Based upon our knowledge of the local area and other sources of species occurrence records (particularly observations recorded in Calflora [2021] and The Cornell Lab of Ornithology [2021a]), we included additional special-status biological resources that have been documented in the project vicinity.

For the list of all special-status species known from the project vicinity, an evaluation of those species with potential to occur onsite was performed based upon the suitability of habitat conditions on the property, and the local distribution (geographical and elevational ranges) and specific requirements (plant communities and soils) of the species considered. Definitive surveys for the presence or absence of special-status animal species were not conducted. We relied on existing information and known occurrence records in the region, coupled with our site-specific observations from other locations in the surrounding area, to make determinations for the probability of occurrence of each special-status species within the study area.

Any special-status species that were observed during the site survey are listed as "Present" in Appendix E. Those species listed as "Potential" met the following requirements: relatively recent records in the vicinity; appropriate plant community and/or soil associations onsite; and, within the elevational range and local distribution of the species. If any one of these elements was not met or considered to be marginal for the site, but the other elements were present, that species was considered "Unlikely" to occur in the study area. In situations where onsite environmental conditions were clearly inappropriate, the only records in the vicinity were very old and/or imprecise, and/or the species has a limited distribution that does not overlap the site, then those species were considered "Not Expected". For animals, if any lifestage or particular life history use (i.e., foraging) fit the requirements of the onsite conditions, even while other aspects were inappropriate for certain functions (i.e., breeding), these species were still considered to have potential to occur onsite, but the likelihood of occurring onsite along with a description of site suitability are provided in the Special-status Biological Resources Summary (Appendix D), as well as a more in-depth analysis in the text.

We determined whether potentially jurisdictional wetlands or drainages, special-status plant and animal species, sensitive natural communities, and designated critical habitat could occur on the site. We then evaluated the potential impacts of the proposed project on each of these biological resource issues, including the six additional impacts in CEQA Appendix G. An evaluation of significance as defined under CEQA is provided for each potential impact.

3.0 RESULTS

A list of plants and animals observed during the survey is included as Appendix B. Appendix C is a plate of photographs taken during the site visit to characterize onsite conditions. Appendix D includes a list of all special-status species, sensitive plant communities, and designated critical habitat recorded within the site vicinity, and an evaluation as to their potential presence onsite. Figure 1 is a site location map, Figure 2 shows the site locations on a USGS Quadrangle basemap, Figure 3 includes wetland habitats recorded in the NWI in the site vicinity, and Figure 4 is a habitat map showing the plant communities, land use types and landscape features in the study area. Figures 5 and 6 show the locations of special-status plants and animals, respectively, within five miles of the study area. Sensitive natural communities and designated critical habitat within five miles of the study area are also depicted on Figure 5.

3.1 Existing Conditions

The study area is located in the northwest portion of the City of San Luis Obispo and is considered an "infill" development site that is surrounded by existing residential and commercial uses. The neighborhood lies near the base of Cerro San Luis Obispo. The property has an existing facility that is supported by two parking lots, landscaping, and other ancillary infrastructure. Old Garden Creek bisects the study area from northwest to southeast, and is lined with riparian habitat mixed with

ornamental species. Additional information about the drainage is provided in Section 3.2 below. A prominent feature of the property is landscaped areas and ornamental plantings along fence lines and structures, which represent a diversity of horticultural specimens. Many of these areas are dominated by mature trees and shrubs that provide structure and food resources (i.e., berries and fruit) for wildlife species that inhabit suburban or edge environments, as well as vegetative screening from the surrounding urban area. Ornamental species have also escaped landscaped areas and occur within the riparian habitat.

Elevations on the relatively flat property range from 235 to 240 feet (71 to 73 meters) above mean sea level. Observations of the soils in the field (limited to riparian corridor) were of dark, loamy clays in landscaped areas and along the riparian corridor. Additional information about the soils onsite is provided in Section 3.3 below.

3.2 Hydrologic Features, Wetlands and Riparian Habitats

Old Garden Creek traverses the site from the northwest to the southeast through the center of the study area and is shown as an intermittent stream on the San Luis Obispo topographic quadrangle. As shown on Figures 3 and 4, the USGS centerline data are generally correct between the two parking lots where development is proposed, but the centerline is not correct in the southeast corner of the study area as the stream exits the site. Downstream from the property it converges with Stenner Creek just upstream of Highway 101 near the Broad Street interchange. Stenner Creek joins San Luis Obispo Creek on the opposite side of Highway 101 near the Marsh Street exit. San Luis Obispo Creek flows southwest parallel to Highway 101, and bends sharply to the west at Avila Beach Drive. It becomes a tidally influenced lagoon in its lower reaches, and flows into the Pacific Ocean at San Luis Obispo Bay in Avila Beach.

Within the study area, the drainage had a defined bed and bank and flowing water (<6-inches deep) was present during the February 8th site visit. Throughout most of its length onsite, the creek channel was lined by dense riparian habitat (described further below). The creek corridor is depicted as a Freshwater Forested/Scrub Wetland in the NWI (Figure 3). Based on the presence of a defined bed and bank structure with seasonal flowing water that connects to San Luis Obispo Creek and the Pacific Ocean, it is expected that the onsite reach of Old Garden Creek would be a water of the United States and State of California. It would be regulated under the Clean Water Act and state Porter-Cologne Water Quality Act. In addition, CDFW would also regulate activities with the riparian corridor pursuant to California Fish and Game Code.

3.3 Soils

Two soil types are present in the study area — Los Osos loam, 15 to 30 percent slopes and Cropley Clay, 2 to 9 percent slopes, MLRA 4 (NRCS 2021). The entire project site is located in paved parking areas that are on the Cropley clay soil map unit. The Los Osos loam is situated on the small slope to the southwest of the parking lot adjacent to Palomar Avenue. Cropley Clay is a clay soil that is an alluvium derived from calcareous shale. It is moderately well-drained and is not considered to be a hydric soil (NRCS 2020)

3.4 Habitat Types

One plant community and two land use types were identified within the study area, and include: 1) Ornamental; 2) Developed/Ruderal; and 3) Riparian. A description of these habitat types is given below and the areas occupied by these features is shown in Figure 4. Representative

photographs of these land use and habitat types are provided in Appendix C.

3.4.1 Ornamental Landscaping

Various ornamental shrubs and trees have been planted within the study area. A large and diverse number of species are present (Appendix B), and some of the dominants include several palms (*Washingtonia* spp.), roses (*Rosa* spp.), liquidambar (*Liquidambar* sp.) and various succulents (*Aloe* spp.). The non-native, ornamental species intermix with native species along the creek corridor, and species such as elm (*Ulmus* sp.) and various fruit trees were planted to create a vegetation barrier adjacent to surrounding development. Ornamental is not a native plant community, and is classified as an Urban habitat within the CWHR System (CDFW 2021d). Creeping vines, such as English ivy (*Hedera helix*), have also invaded the riparian corridor along the creek.

3.4.2 Developed/Ruderal

Developed/Ruderal areas onsite consist of the existing apartment complex, driveway, parking areas, and intensively landscaped areas (Figure 4). Ruderal areas consisted mostly of disturbed bare ground and pavement. Developed/Ruderal areas are an anthropogenic land use type and are not a natural community. They are classified as an Urban habitat within the CWHR System (CDFW 2021d).

3.4.3 Riparian

A band of Riparian forest is present along Old Garden Creek. This community was dominated by coast live oak (*Quercus agrifolia*), and contained arroyo willow (*S. lasiolepis*), as well as other native species that were planted or had spread naturally, such as toyon (*Heteromeles arbutifolia*). There were also a variety of non-native ornamental species that were intentionally planted, such as the various palms along the edge of the parking lots. Native species in the understory included poison oak (*Toxicodendron diversilobum*), coyote brush (*Baccharis pilularis*), and a few young multi-stemmed southern California black walnut (*Juglans californica*). The understory was very dense in some areas with a high number of fallen, dead branches and woody debris, while in other areas it was well-maintained and limbed up with good visibility. At the northern end of the riparian habitat outside of the canopy, and within an old crossing of the drainage channel in the southern part of the property, the channel had scattered herbaceous wetland plant species such as tall flatsedge (*Cyperus eragrostis*). This habitat type corresponds to the Central Coast Live Oak Riparian Forest community described by Holland (1986) and the *Quercus agrifolia*/*Salix lasiolepis* association in VegCAMP (CDFW 2021b).

3.5 **Special-status Biological Resources**

The background review revealed an exceptionally large number of special-status biological resources that have been documented within the project vicinity (Appendix D). The diversity of habitats ranging from the coastline, valleys, and mountainous areas, in addition to rare habitat types such as serpentine rock outcrops, and the concentrated effort in this area to survey for and record rare species have resulted in the large number of occurrences. The study area supports approximately two acres of highly disturbed habitats. The Ornamental habitat type is disturbed, but can also support nesting birds, due to the diversity of species planted, their density, and fruits/seeds as food sources. Although available undeveloped habitat is limited, mobile wildlife species and plant propagules could also access the site from the larger surrounding area where there is substantial open space, including nature reserves and recreation areas, and CalPoly and



Camp San Luis Obispo lands. Special-status biological resources with potential to occur in the study area are described below. Also see Figure 5 for a map of CNDDDB plant records within five miles of the property.

3.5.1 Special-status Plants

The background review determined that there was very little potential for special-status plant species to occur in the proposed development area. Given the riparian/creek zone is narrow, with some areas regularly maintained and dense carpets of non-native English ivy, many of the rare plants known to occur in the region are not expected to occur onsite. Please refer to Appendix E for further detail. Only one special status plant species was identified as having potential to occur onsite during the background review, and several young individuals were present along the creek corridor. Further information is as follows:

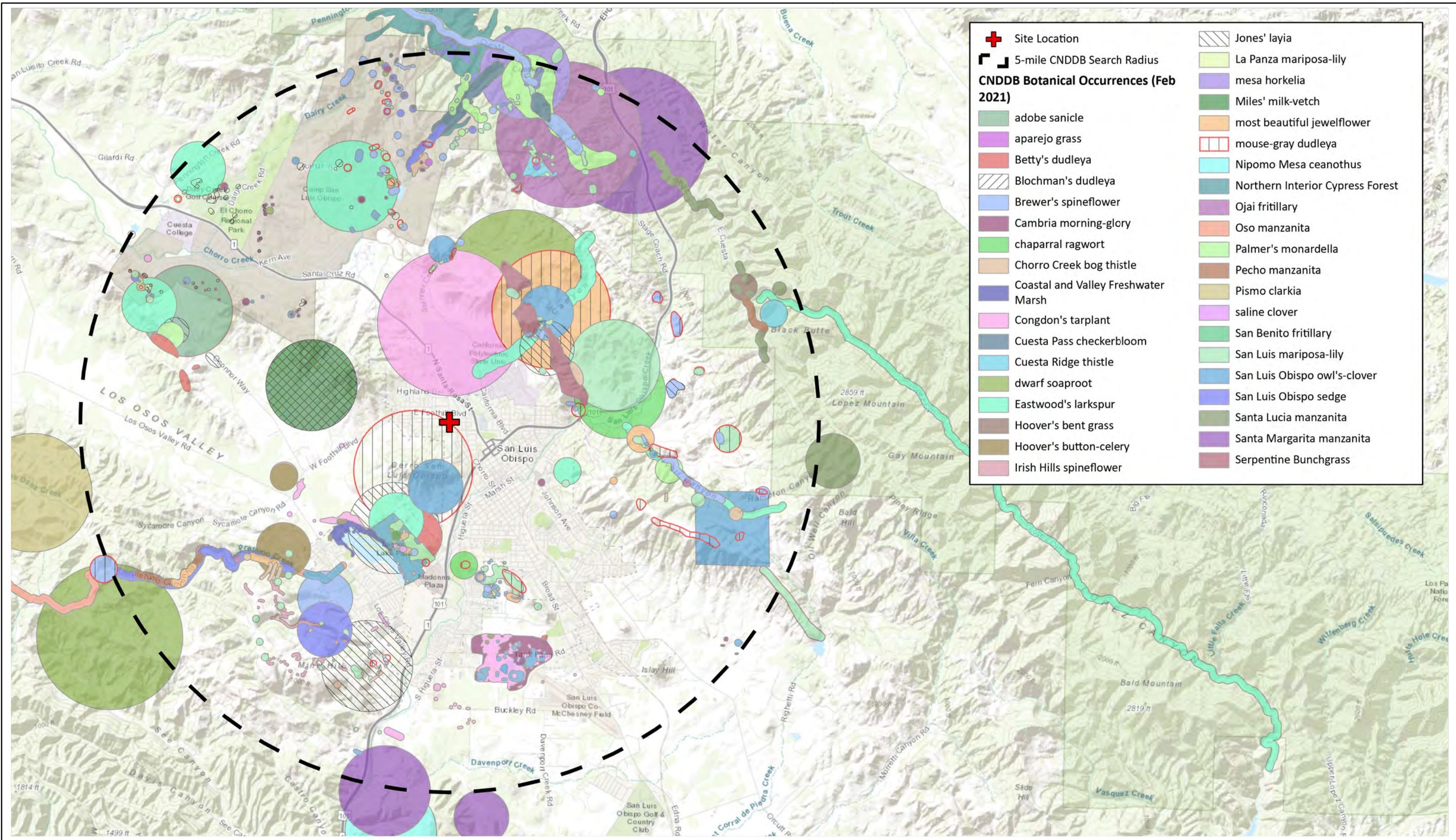
- **California (southern) black walnut** (*Juglans californica*) — CRPR 4.2;

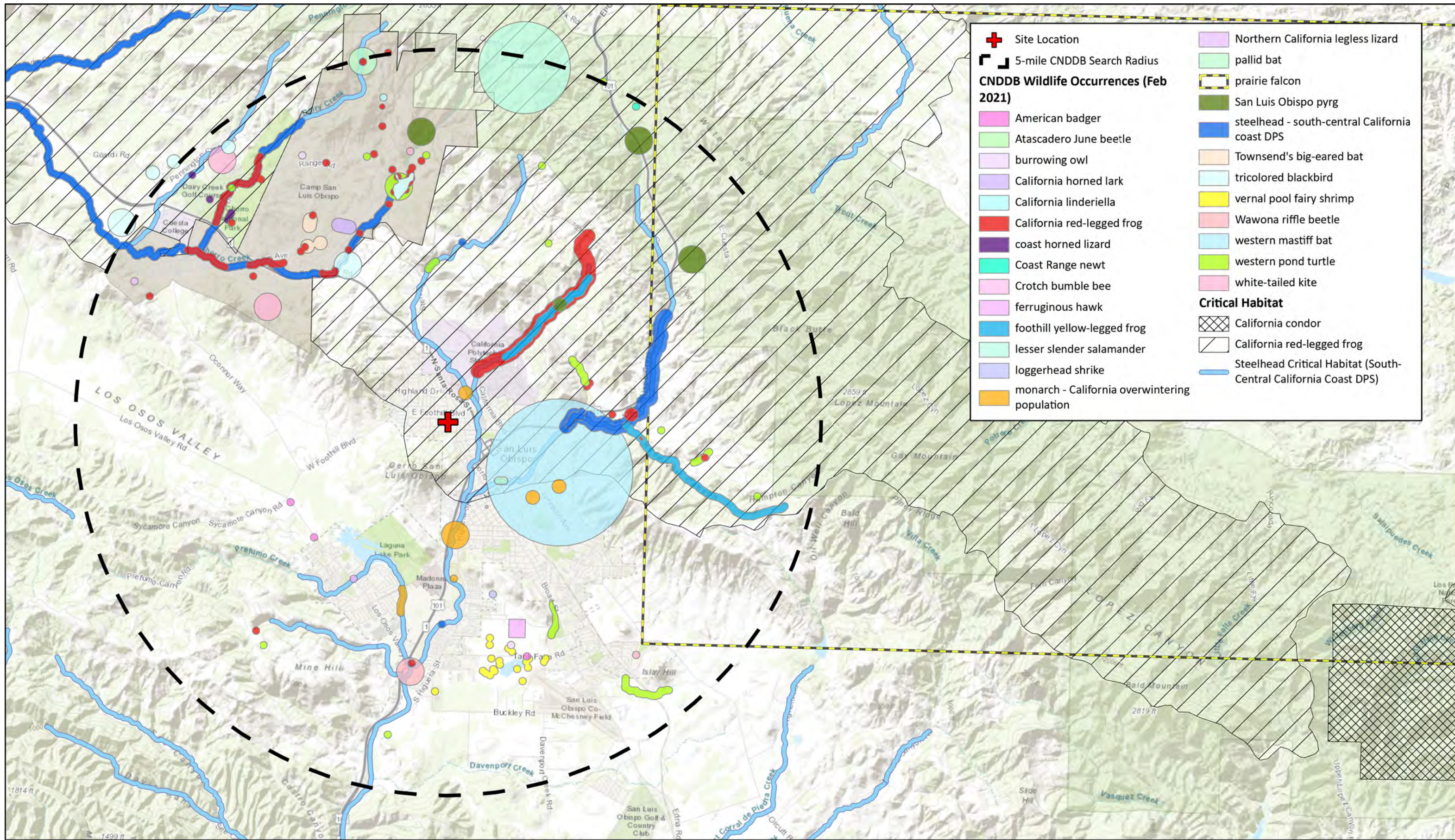
Approximately five (5) southern California black walnut trees were found in the understory of the Riparian habitat onsite. This species is considered to be a CRPR 4.2 (a watch list) species within its native range. It is a perennial deciduous tree in the family Juglandaceae that occurs along streams in riparian and southern oak woodland habitats. It has been planted extensively and used as root stock for the English walnut. This species was not recorded in the CNDDDB in the vicinity, but there are other records in Calflora (2021) in creekside habitats near the site, especially along the lower reaches of San Luis Obispo Creek adjacent to Highway 101. Although this species is widely distributed throughout the Sacramento Valley, coastal mountains from Mendocino County to San Diego County, and various inland locations in southern California (Calflora 2021), it is native only to Santa Barbara County and areas to the south (CNPS 2021a). Hoover (1970) identifies black walnut in San Luis Obispo County as having been introduced. It would not be considered to be a special-status species onsite because it is outside of its native range, and appears to have been planted and the young specimens in the creek likely have naturalized onsite from the historic plantings.

The suite of rare serpentine endemic species reported by the CNDDDB were determined to not have potential to occur onsite based on the lack of suitable soils or serpentine rock outcrops. The annual species that have been recorded near the study area (Figure 5), are associated with loam or clay soils, which are present on the greater project site, but not from the proposed disturbance footprint. Although the February 2021 reconnaissance survey was conducted outside the blooming period of special status plants identified by the CNDDDB, the background review and field investigation were considered to be comprehensive, and were sufficient to determine the site has low potential to support special-status plant species. No further botanical surveys are recommended at this time.

3.5.2 Special-status Animals

The CNDDDB contains a large number of recorded occurrences of special-status wildlife species within 5-miles of the study area. The review of special-status species records and local knowledge of the area. While the listing status, habitat associations and evaluation of occurrence are summarized in Appendix D, the following species were identified as having potential to occur onsite during some stage in their life cycle, and as such are described in further detail below. Please review Appendix D and Figure 6 – the CNDDDB wildlife map further detail.





The **obscure bumble bee** (*Bombus caliginosus*) does not have a specific listing status, but is considered sensitive in the CNDDDB and could be a species of local concern. It is found along the California coast from Santa Barbara County northward. The host plants for this species occur in coastal scrub, riparian, and grassland habitats. Queens emerge from hibernation in late-January, workers appear in early-March, and males emerge in April. Colonies dissolve in late-October, with only the new queens surviving. Willows and coyote brush, along with a suite of ornamental species, were seen at the site and could potentially be a food source for this species. Little is known about this species in San Luis Obispo County. Most CNDDDB records are from collections made from the 1940s through the mid-1970s, and the locality information from these collections mostly is imprecise. No overwintering habitat appeared present since the ornamental area is highly maintained and creek corridor is narrow and densely vegetated.

The **San Luis Obispo pyrg** (*Pyrgulopsis taylori*) is an aquatic snail that has no specific listing but considered sensitive by the CNDDDB. This species inhabits freshwater habitats, but individuals have also been observed on rocks and in leaf litter around aquatic sites (CDFW 2021a). This species has been recorded nearby in Brizziolari and Chorro creeks (CDFW 2021a). Potentially suitable habitat may be present in the onsite drainage, even though it does not support perennial water.

The **northern California legless lizard** (*Anniella pulchra*) is a CDFW Species of Special Concern. This species occurs in a variety of habitats as long as there is soil moisture and cover, including beach dunes, chaparral, pine forest, oak woodland, riparian forest and scrub, coastal scrub and landscaped areas near residences (California Herps 2021). This species is fossorial and buries into loose soils, leaf litter, or is associated with cover objects that provide moisture (i.e., rocks, boards, and logs). They forage just beneath the surface of loose soil or in leaf litter during the morning or evening and may be active above the surface at dusk or at night (California Herps 2021). Their peak activity near the surface is from February through May (Yasuda 2012). There are several records from the general vicinity, but only one record nearby, from Camp San Luis Obispo in 1998 (CDFW 2020a). Because they are fossorial and found near the surface during a limited time seasonally, this species is often under-reported even when common. Suitable habitat is present in the riparian corridor and lesser so in the ornamental habitat adjacent to the creek, where there is abundant leaf litter or other ground cover, but the clay soils may be unsuitable. They would not be present in the disturbance area, which is the existing parking lots.

Cooper's hawk (*Accipiter cooperii*) is on the CDFW Watch List for nesting. This is a woodland species that prefers dense stands of coast live oak, riparian forest, and mixed coniferous forests near a source of water. They prey on birds, small mammals, reptiles and amphibians. They have been documented in numerous locations at CalPoly, on the east side of Bishop Peak, and throughout the residential areas surrounding the site (The Cornell Lab of Ornithology 2021a). The dense Riparian and Ornamental habitats onsite would be suitable for foraging and nesting.

The **ferruginous hawk** (*Buteo regalis*) is on the CDFW Watch List for wintering sites, and it occurs in this area during the winter. They use lower elevation open grassland habitats, and also occur in sagebrush, desert scrub, and edges of pinyon-juniper (CDFW 2021d). Roosting is in open areas on a lone tree or utility pole. They prey on rabbits, ground squirrels, mice, amphibians and reptiles (CDFW 2021d). There are several observations from open grassland habitats surrounding the site, such as at CalPoly, along Highway 1, and O'Connor Way (The Cornell Lab of Ornithology 2021a), and wintering has been documented nearby (CDFW 2021a). Individuals could perch or roost in the Riparian or Ornamental habitats, but they do not nest in this area. They could potentially use the site as a stopover during winter.

The **loggerhead shrike** (*Lanius ludovicianus*) is a CDFW Species of Special Concern for nesting. This species occurs in variety of relatively open habitats with low vegetation and well-spaced shrubs or trees, such as coastal scrub, grasslands, agricultural fields, pastures, riparian areas, desert scrub, savannas, prairies, golf courses, and along roadsides. They prefer areas where there are objects to perch on such as fences, trees or shrubs (Audubon 2021). Nests are placed in dense and sometimes thorny trees or shrubs and brush piles (Audubon 2021). They prey on insects, amphibians, reptiles and small mammals, and may impale their prey on sharp objects. There are observations of this species near the study area at CalPoly, within urban San Luis Obispo, and at Camp San Luis (The Cornell Lab of Ornithology 2021a). Suitable foraging habitat is present throughout the Riparian and Ornamental habitats for this species. They could build nests in the dense shrubby Ornamental or Riparian areas.

The **prairie falcon** (*Falco mexicanus*) is on the CDFW Watch List for nesting. This species forages in open grasslands, scrublands, and agricultural areas including feed lots. Nesting habitat is generally rock formations and large trees, but they also occur in urban areas and nest high on buildings. This species has been recorded at several locations on CalPoly and around the edge of the San Luis Obispo urban area (The Cornell Lab of Ornithology 2021a). Although highly unlikely, they potentially could nest or roost along the riparian corridor. No stick nests indicative of raptors were observed during the survey.

The **sharp-shinned hawk** (*Accipiter striatus*) is on the CDFW Watch List for nesting. Although not reported by the CNDDDB in the 5-mile search radius, This species generally occurs in densely forested coniferous forests, mixed woodlands and riparian habitats, and dense forest is required for nesting. During migration, it uses coastlines, lake shores and mountain ridges (Audubon 2021). It does not breed in San Luis Obispo County. There are numerous observations of this species from surrounding the site, including three records from the adjacent neighborhood, CalPoly and urban San Luis Obispo (The Cornell Lab of Ornithology 2021a). This species could occur onsite during migration and could periodically forage onsite, but does not nest in this area. The Riparian and Ornamental areas onsite are suitable for foraging.

The **tricolored blackbird** (*Agelaius tricolor*) is a state Threatened species and a CDFW Species of Special Concern for nesting colonies. This species nests and roosts colonially in freshwater marshes with dense tules, cattails, or blackberry thickets. They forage in areas with low-growing vegetation such as agricultural fields, grasslands and feedlots. Wintering tricolored blackbirds congregate in large multispecies flocks, often containing red-winged blackbirds (The Tricolored Blackbird Working Group 2007). Nesting colonies have been recorded at several ponds along Highway 1 (CDFW 2021a), and there are numerous observations on CalPoly agricultural lands (The Cornell Lab of Ornithology 2021a) near the site. No suitable water sources are present onsite for breeding habitat, but individuals may forage periodically within the riparian corridor as transients.

The **white-tailed kite** (*Elanus leucurus*) is a CDFW Fully Protected species for nesting sites. This species prefers open areas for foraging, including grasslands, river valleys, oak savanna, agricultural areas, deserts, and marshes (Audubon 2021). They nest in large isolated trees, and occasionally in riparian habitats (CDFW 2021d). During the non-breeding season, they roost communally in trees or tall shrubs at the edges of grasslands (The Cornell Lab of Ornithology 2021b). This species has been recorded at several locations close to the property on CalPoly agricultural lands, as well as the urban area of San Luis Obispo (The Cornell Lab of Ornithology 2021a). They could forage and roost or nest in the Riparian or Ornamental habitats onsite.

The **yellow warbler** (*Setophaga petechia*) is a CDFW Species of Special Concern for nesting. In California, this species breeds along coastal areas from Del Norte County south to Ventura County, where it prefers medium-density riparian woodlands. This is a migratory species that occurs in this area only during the breeding season. This species is closely tied to riparian habitat for foraging and nesting, but they also use residential areas and orchards. There are several records of this species from along San Luis Creek in downtown, Cal Poly, Camp San Luis and at a residence in the neighborhood surrounding the site (The Cornell Lab of Ornithology 2021a). The Riparian, and to a lesser extent Ornamental trees and shrubs onsite are suitable for this species, and they could forage or nest onsite.

The **pallid bat** (*Antrozous pallidus*) is a CDFW Species of Special Concern. This species forages in a variety of dry, open habitats such as grassland, deserts, woodland, shrubland and coniferous forest. Maternity and winter roosting sites are cavities or caves in rock features, large trees or buildings, and these structures must substantially moderate temperature. Day roosts are in caves, crevasses, mines and occasionally hollow trees or buildings. Night roosts are in more open areas such as porches or agricultural buildings. They forage on beetles, moths, spiders, scorpions, and Jerusalem crickets (CDFW 2021d). There are records of the species from the vicinity, including Camp San Luis Obispo and the tunnel for San Luis Creek within the city (CDFW 2021a). They could forage over the site and night roost in the existing structures. There is a slight possibility they could day roost in the riparian corridor.

Townsend's big-eared bat (*Corynorhinus townsendii*) is a CDFW Species of Special Concern. This species occurs in a variety of habitats, including dry upland areas, semidesert, coniferous forest, and riparian woodland. They prefer foraging along the edges of riparian vegetation and they drink water from ponds. They roost in caves, mines, abandoned buildings and under bridges (Gruver and Keinath 2006). They are considered to widespread throughout California except for high elevations in the Sierra Nevada and occur in this area throughout the year (CDFW 2021d). There are records or roost sites on Camp San Luis Obispo and along Chorro Creek (CDFW 2021a). The rocky areas of nearby Bishop Peak may also be suitable for roosting. This species could forage over the site where there is suitable Riparian, but there is no suitable habitat for roosting. The structures onsite would not be suitable because of frequent human disturbance.

The **western mastiff bat** (*Eumops perotis californicus*) is a CDFW Species of Special Concern. It occurs in coniferous and deciduous woodlands, coastal scrub, grasslands, chaparral, deserts and urban areas (CDFW 2021d). This species is resident year-round in the Coast Ranges, and are active nocturnally throughout the year. They roost in cliff faces, tunnels, on buildings or in trees. Maternity roosts are restricted to crevices in rock formations or buildings (CDFW 2021d). There is a record in the CNDDDB from the general area of San Luis Obispo (CDFW 2021a). This species could forage over all areas of the property. They could roost in the large trees onsite or in structures.

3.5.3 Sensitive Natural Communities

The Riparian habitat onsite is dominated by coast live oak with some arroyo willow in the downstream limits, and aligns with the Central Coast Live Oak Riparian Forest community, which has a State Rarity Rank of 3.2. Riparian habitats are also considered to be sensitive biological resources by the City and CDFW. Some periodic occurrences of wetland plants were also observed in the channel, but did not provide sufficient cover to warrant classification as a separate plant community. See Appendix D and Figure 5 for information on other sensitive natural communities known to occur in the vicinity, but that do not occur onsite.

3.5.4 Designated Critical Habitat

The study area occurs within the outer limits of designated critical habitat for the California red-legged frog (Figure 6). This area is Unit SLO-3 Willow and Torro Creeks to San Luis Obispo, and comprises approximately 116,517 acres (USFWS 2010). The unit occurs along the coast of central San Luis Obispo County, north of Morro Bay, and extends eastward to include the northern portion of the City of San Luis Obispo and areas east of the city. It provides connectivity within and between the inner Coast Range and the Santa Lucia Range. The unit contains features that are essential for the conservation of the species, including: 1) permanent and ephemeral aquatic breeding habitat; 2) non-breeding aquatic and riparian habitat; 3) upland habitat; and 4) dispersal habitat (USFWS 2010).

The study site does not provide suitable aquatic breeding habitat for the California red-legged frog. Old Garden Creek is too ephemeral and does not contain water of sufficient depth long enough for California red-legged frog larvae to complete metamorphosis. The stream lacks any significant pools, and is also of insufficient depth to support adult frogs, which dive into the water to escape predators and are associated with water depths of at least 2.3 feet deep (Hayes and Jennings 1989). The riparian habitat and mesic conditions along the stream corridor could potentially be used by juvenile frogs dispersing away from breeding ponds, if there were such sites adjacent to the property. Based on aerial photograph review, it does not appear that potential breeding ponds are nearby. The high level of urbanization of the area also reduces the quality of riparian habitat onsite. The designated critical habitat ruling considers upland areas within 1 mile (1.6 kilometers) within suitable aquatic habitats to be essential for shelter, foraging, predator avoidance, and maintaining the environmental conditions supporting the aquatic habitat. Upland and riparian habitat within 1 mile of occupied or previously occupied aquatic sites is also critical for dispersal between these sites (USFWS 2010). The CNDDDB contains an historic record of the California red-legged frog within approximately one mile from the study area at Brizziolari Creek, which is separated from the site by Highway 1. The next closest record to the study area is Chorro Creek at Camp San Luis Obispo, at almost two miles away, also on the opposite side of Highway 1. The highway would be considered to be a barrier to dispersal where there is a concrete median and high degree of traffic may otherwise prevent any successful movement. Two potentially suitable ponds are seen on aerial photography within the general project region on the same side of Highway 1 but is separated by urban development. Based on this analysis, the study area does not provide linkage to any other suitable aquatic sites and is surrounded by dense urban development. Therefore, the site would not be considered suitable for breeding or upland dispersal habitat for the frog even though it is present within designated critical habitat.

3.5.5 Migratory Birds and Raptors

There are numerous bird species with potential to occur at the site that could nest in the onsite Riparian and Ornamental habitat types. In addition to the special-status bird species described above, avian species that could nest onsite also include raptors protected under California Fish and Game Code, the Bald and Golden Eagle Protection Act, and common species that are protected under the MBTA.

4.0 IMPACT ANALYSIS

The following impact analysis is intended to help guide project planning efforts and support the CEQA review process. It is important to note that the applicant has already included protection

measures for nesting birds, riparian habitat and water quality in the project description. The project will be located on existing parking lots and will reduce the extent of impervious areas on the site. Erosion control measures and compliance with city stormwater control requirements will also ensure the project avoids impacts to the creek corridor and downstream aquatic habitats. The impact discussion evaluates the range of impacts that could result from implementation of the proposed project. Direct effects (or impacts), as defined under CEQA, are caused by a project and occur at the same time and place. Indirect effects are caused by a project, but occur at a different time or place. Cumulative effects are those that result from when the effects of the subject project combine with effects from other unrelated projects to compound environmental harm. Our understanding of the extent of proposed development footprint, along with the observations of onsite conditions from the site visit and desktop evaluation of special-status biological resources in the project vicinity, provided the basis for this analysis.

4.1 Direct and Indirect Effects

The impact area for the proposed project would occur in the Developed/Ruderal and Ornamental land uses associated with an existing development. Trees, as well as various shrub species, planted in landscaped and ornamental areas would be removed as shown on project plans. Non-native trees along the edge of the parking lot adjacent to Riparian habitat may also be removed and/or transplanted, while native oaks, willows and other riparian species would be protected. The proposed project includes a setback from the creek's top of bank and edge of riparian habitat, but the applicant is requesting the setback be modified for the upper stories, and other select areas. Selective grading is proposed within the revised creek setback, which would occur on paved parking lot and disturbed/developed areas, and thereby avoids impacts to the Riparian habitat. The proposed project will tie-in to the existing onsite storm-drain system, and no new outfalls are proposed in Old Garden Creek. There is potential for direct effects nesting birds and bat species during the removal of trees and other vegetation, during site grading and other construction activities, as described in Section 4.1.1 below, but the project description requires biological surveys and monitoring to ensure no impacts to these species occurs during construction. Potential also exists for indirect effects on the Riparian habitat onsite and habitats and associated species located downstream from the site, through surface runoff over disturbed areas during or after construction. However, the project proponent will have a detailed erosion and sediment control plan and will be required to comply with the city's stormwater control plan to ensure creek resources are not adversely affected. Each of these potential effects is discussed in the sections following.

4.1.1 Adverse Effects on Candidate, Sensitive or Special-status Species

Southern California black walnut trees were identified onsite and determined to not meet the rarity threshold since they appeared to be planted ornamental species outside their normal range. The upwards of five young walnut trees observed along the creek appeared to have been recent recruits from historic plantings onsite or in the immediate area. They will not be affected by construction of the project. No other special-status plant species evaluated in Appendix D are expected to occur on the site, and no further botanical surveys are recommended.

There would be no measurable negative effect on wildlife habitat because the approximately two acres of developed lands that would be lost are only adjacent to marginally suitable habitat for wildlife species. Further, the Riparian habitat and creek corridor would be protected during construction and maintained and enhanced as part of the project's landscaping (as described below in Section 4.1.2). The potential for direct project effects on individuals of special-status wildlife is

not expected due to the inclusion of biological surveys and monitoring to avoid certain activities during specific seasons, such as the nesting bird period. It is important to note that a project's effects on wildlife species varies based on the timing of the initiation of construction activities with the manner in which these species may utilize the site. Individuals of special-status species that use the site on a transitory basis and are mobile, such as foraging monarch butterflies, obscure bumble bees, birds and bats, are expected to move away from any temporary disturbance during construction activities and would not be directly affected. Similarly, birds and raptors that could temporarily roost in the trees also would not be affected because they would naturally relocate, and roosting habitat will be preserved and enhanced. Species that would only use the site for foraging and that do not breed in this area or in which suitable breeding habitat is not present would not be affected by the project include: ferruginous hawk, sharp-shinned hawk, and tricolored blackbird. The San Luis Obispo pyrg, if it were present onsite, would be limited to the immediate creek corridor, and no construction would occur in this habitat. The project will have an erosion and sediment control plan and comply with the city-required stormwater control plan to protect the creek habitat from indirect effects of sedimentation and pollutants. This is detailed in the project description. While many of the special-status bird species listed in Appendix D could use the large trees and shrubs in the Riparian and Ornamental habitats for nesting, the project description includes biological surveys and monitoring to ensure construction activities initiated during the nesting season avoids impacts to birds, as well as roosting bats. Individuals of less mobile species such as the northern California legless lizard may occur in the creek corridor, but no ground disturbing activities such as grading would occur in this area. Legless lizards are not expected to occur in the paved parking lots and adjacent ornamental areas, and therefore, the project is not expected to adversely affect this species. Bat species could roost in the non-native trees in Ornamental or Riparian areas or in the structures that would be removed (if required), and the biological surveys and monitoring detailed in the project description would ensure the project avoids impacts to roosting bats that could potentially be present.

Designated critical habitat for the California red-legged frog is present at the project site. However, no suitable aquatic habitat for this species is present on the site, and construction of the project would only represent marginal upland and dispersal habitat composed of paved parking lots. No known populations are within 1.0 mile of the site, and the development area is surrounded by barriers to dispersal (i.e., Highway 1 and urban development) from known occurrences in the region. The site would be considered to be unlikely for non-breeding, upland and dispersal habitat for the frog. Therefore, the loss of less than two acres of paved parking lot within designated critical habitat is not significant from a biological resources perspective, nor should it be considered a potential impact pursuant CEQA. The Riparian habitat and the creek corridor will be avoided and would continue to provide suitable habitat to support a dispersal corridor from one end of the site to the other. Because there would be no significant effects on California red-legged frog critical habitat, no mitigation is needed.

In addition to the special-status bird species identified with potential to nest onsite (Appendix D), other avian species protected under the MBTA and California Fish and Game Code could also be present in the project vicinity on a seasonal basis. If construction takes place during the nesting season, biological surveys and monitoring would be conducted to ensure these activities do not result in the mortality of eggs or young reliant on the nest, or other indirect disturbance from construction activities disrupting nesting behavior of avian species in adjacent areas. Project effects on active bird nests, therefore, would not be significant with the inclusion of biological surveys and monitoring for nesting birds if construction is initiated during the nesting season (February 1 through August 31), and no additional mitigation would be required.

As an additional protection measure to avoid impacts to the creek corridor, riparian habitat, nesting birds and other wildlife, the project proponent will have a qualified biologist prepare a Worker Environmental Awareness Program that will be presented to all project personnel before the start of construction. This program shall detail measures to avoid impacts on biological resources, and will include a description of special-status species potentially occurring on the project site and their natural history; the status of the species and their protection under environmental laws and regulations; and, the penalties for take. Review of the erosion and sediment control measures as well as any other appropriate recommendations shall be given as to actions to avoid impacts to all wildlife during construction. Other aspects of the training shall include a description of general measures to protect wildlife, including:

- Delineation of the allowable work area, staging areas, access points and limits to vehicle access;
- Storage of all pipes, metal tubing, or similar materials stored or stacked on the project site for one or more overnight periods shall be either securely capped before storage or thoroughly inspected for wildlife before the materials are moved, buried, capped, or otherwise used.
- Inspected of materials stored onsite, such as lumber, plywood, and rolls of silt fence, for wildlife that may have sheltered under or within the materials;
- Use of netting to exclude birds from nesting in construction materials;
- Constructing escape ramps in all excavations and trenches more than 6-inches deep;
- Contact information for the City-approved biologist and instructions should any wildlife species be detected in the work site;
- Dust suppression methods during construction activities when necessary to meet air quality standards and protect biological resources; and
- Methods for containment of food-related trash items (e.g., wrappers, cans, bottles, food scraps), small construction debris (e.g., nails, bits of metal and plastic), and other human-generated debris (e.g., cigarette butts) in animal-proof containers and removal from the site on a weekly basis.

All project personnel who have attended the training shall sign an attendance sheet. The program shall be repeated for any new crews that arrive subsequently on the site.

4.1.2 Adverse Effects on Riparian Habitat or Sensitive Natural Communities

The Riparian habitat onsite is considered to be classified as the Central Coast Live Oak Riparian Forest community, which has a State Rarity Rank of 3.2, and as such is considered sensitive under CEQA. Riparian habitats are also considered to be sensitive biological resources by the City and CDFW. The extent of the Riparian habitat onsite has been delineated (Figure 4 and project plans), and all project activities will remain outside of this area. No other sensitive communities as designated by the CDFW occur onsite.

No permitting pursuant to Section 404 of the Clean Water Act (Corps); Section 401 of the Clean Water Act and Porter-Cologne Water Quality Control Act (RWQCB); and, Sections 1600 et seq. (CDFW) is required to implement project activities as proposed since they will be setback from the jurisdictional areas. Permanent impacts have been designed to remain outside of the modified creek setback. The site plans show that grading would remain outside of, but very close to, the edge of Riparian dripline. If the project description changes and requires work within the riparian corridor, these activities should be reviewed to determine if notification and permitting from these

agencies is required.

Riparian habitat onsite as well as downstream of the project will be protected during construction through the installation of orange protective fencing or other measures to demarcate the limits of construction in proximity to the creek. The project erosion and sediment control plan and compliance with the City’s stormwater requirements will also ensure that the project does not result in indirect impacts to water quality in Old Garden Creek. Areas with disturbed soils along the creek corridor would be restored under the direction of the project engineer in consultation with a qualified restoration ecologist. Methods could include recontouring graded areas to blend in with existing natural contours, covering the areas with salvaged topsoil, and/or applying the native seed mix as described in Table 1. Native seed mix can also be applied to the graded areas in the creek setback area through either direct hand seeding or hydroseeding methods, and combined with landscaping, mulching and other erosion and sediment controls to ensure project activities are consistent with City requirements.

Table 1. Native Erosion Control Seed Mix

Species	Application Rate (lbs./acre)
<i>Bromus carinatus</i> (California brome)	10
<i>Stipa pulchra</i> (purple needlegrass)	5
<i>Trifolium wildenovii</i> (tomcat clover)	5
<i>Vulpia microstachys</i> (six weeks fescue)	5
Total	25

4.1.3 Interference with Movement of Native Fish or Wildlife, Wildlife Corridors, and Wildlife Nursery Sites

The proposed project would not affect the movement of native fish because all work will be conducted outside of stream channel. In addition, the reach of the drainage in the subject property is too ephemeral to support fish. No equipment or materials will enter or be placed in the channel that could affect fish downstream.

The subject property is unlikely to be used for wildlife movement because it does not provide linkage to other suitable habitat areas. The site is surrounded by dense urban development, and as such, there are little opportunities for wildlife to move through the property as it exists. The creek corridor will be protected and development setback from the top of bank. The creek setback zone will be enhanced post construction through native landscaping and weed abatement, and this area would continue to be used as a stopover point or corridor for wildlife that are adapted to human development. Therefore, there would be no negative impacts of the project on wildlife corridors or movement.

The Ornamental trees on the site that would be removed or transplanted could be used as nesting sites for a variety of nesting birds suited to nesting in urban environments. Until replacement ornamental trees are established, the Riparian corridor will continue to offer the best opportunity for nesting birds. Ultimately, there would be no net loss of nesting habitat on the site. Therefore, there would be no impact of the project on wildlife nursery sites. Because there would be no project impacts on the movement of native fish or wildlife, wildlife corridors or wildlife nursery sites, no mitigation is required.

4.1.4 Conflicts with Local Policies or Ordinances, Such as Tree Preservation

The project may require the removal of planted non-native species of trees that are at least three (3) inches DBH. As detailed in the City's Municipal Code for Tree Removal 12.24.090, these trees are required to be replaced at a 1:1 ratio for tree planting to be conducted onsite. A compensatory tree planting program would be developed and could include areas within the creek setback area. It is envisioned that additional tree planting will take place within the development as part of the landscaping effort to mitigate all tree removal on the site. The applicant would meet the final specifications of the City's municipal code for tree protection and replacement in order to receive permit approval. Once these conditions are met, there would be no additional impacts under CEQA for tree removal, and as such, no additional mitigation is required.

4.1.5 Conflicts with Conservation Plans

No local, regional or state conservation plans have been prepared for the area in which the project is located; therefore, there would be no conflicts with these plans and no mitigation is required.

4.2 Cumulative Effects

The proposed project is located within the developed urban limits of the City of San Luis Obispo and is surrounded on all sides by dense urban development. It is currently developed as a senior care facility with a large proportion of landscaping and ornamental plantings, and parking lots. There are no natural habitats within the impact area that have not already been disturbed, and the project would not affect Riparian habitat associated with Old Garden Creek. The project has been designed to avoid impacts to special status wildlife and nesting birds, and to prevent stormwater runoff from the site from affecting the Riparian habitat on- and off-site during and shortly after construction. The development plan includes stormwater management techniques for the long-term in order to comply with City requirements. The project as proposed will have no significant effects on biological resources on the site or in the immediate project area. The loss of approximately two acres of a highly developed site within an existing developed parking lot would not have any significant effects on biological resources, especially considering that the Riparian habitat will be avoided and protected. Because there would be no effects of the project in the context of the site's importance in the overall area, the project would not contribute to cumulative effects of other non-federal projects planned in the area.

5.0 CONCLUSIONS

The proposed project involves the redevelopment of an existing developed site to increase the current Assisted Living housing and related services. The project impact areas are highly disturbed from many years of human activities and do not contain significant biological resources. No impacts to rare plants or animals or sensitive Riparian habitat would occur since project development would be sited in developed areas (i.e., parking lot and adjacent landscaped areas). This analysis determined that the proposed project was designed to avoid impacts to biological resources, including the onsite portion of Old Garden Creek, and does not meet any of the criteria that would trigger mandatory findings of significance under CEQA.

6.0 REFERENCES

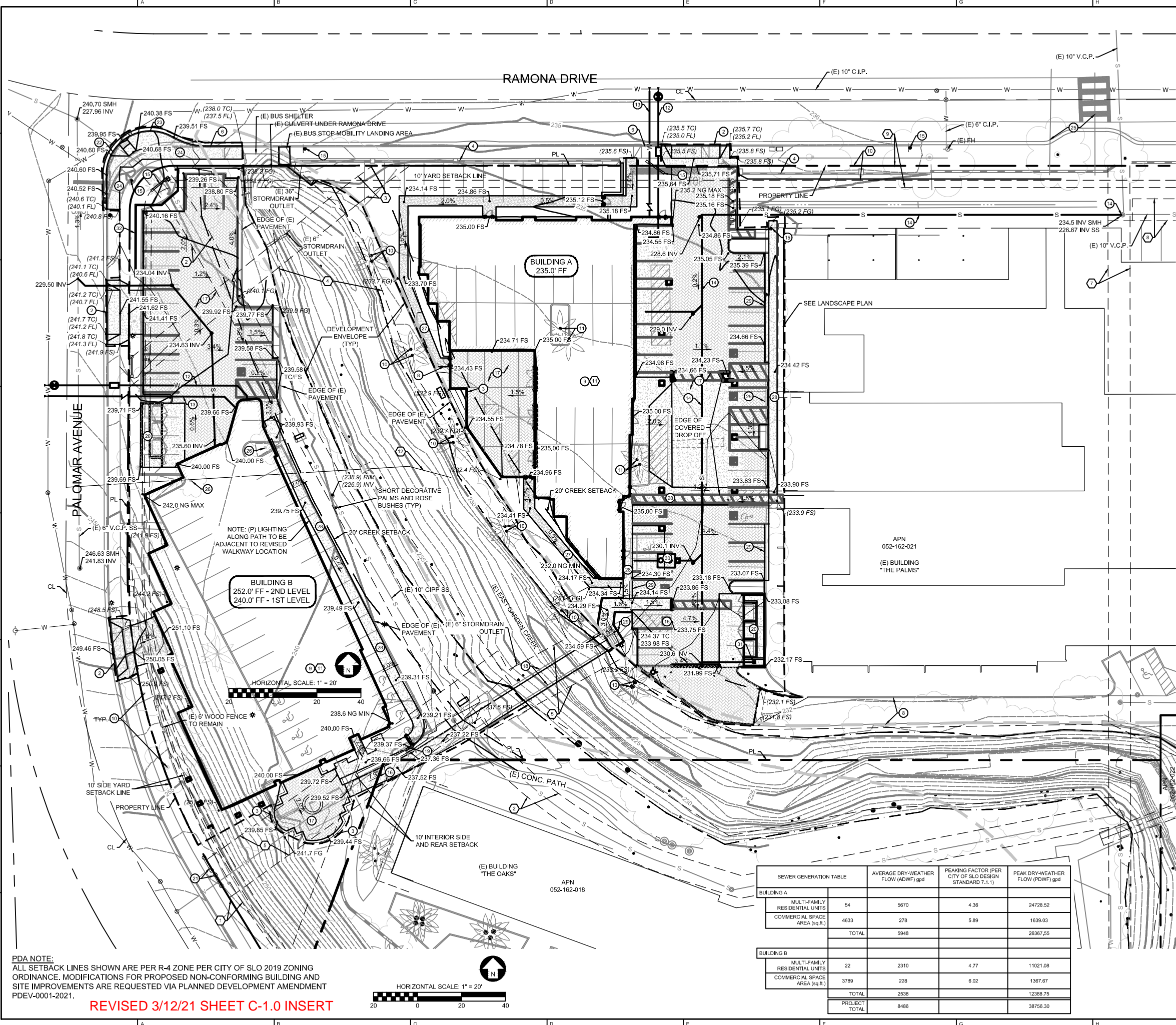
- Audubon. 2021. Guide to North American Birds. Accessed via: <https://www.audubon.org/bird-guide> in February 2021.
- Bolster, B.C. (editor). 1998. Draft Terrestrial Mammal Species of Special Concern in California. Contributing authors: P.V. Brylski, P.W. Collins, E.D. Pierson, W.E. Rainey and T.E. Kucera. Prepared for California Department of Fish and Game, Wildlife Management Division, Nongame Bird and Mammal Conservation Program. Contract FG3146WM.
- Calflora. 2021. Information on Wild California Plants for Conservation, Education, and Appreciation. Berkeley, California. Accessed via <http://www.calflora.org/> in February 2021.
- California Department of Fish and Game (CDFG). 2001. Fish and Game Code of California, Section 3503.5. Gould Publications, Altamonte Springs, Florida.
- California Department of Fish and Wildlife (CDFW). 2018 (March 20). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.
- CDFW. 2021. Special Animals. Biogeographic Data Branch, California Natural Diversity Database.
- CDFW. 2021a. California Natural Diversity Database (CNDDDB). Commercial version dated February 6, 2021. Accessed via: <https://www.wildlife.ca.gov/Data/CNDDDB> in February 2021.
- CDFW. 2021b. Vegetation Classification and Mapping Program (VegCAMP). Accessed via: <https://www.wildlife.ca.gov/Data/VegCAMP> in February 2021.
- CDFW. 2021c (February). Special Vascular Plants, Bryophytes, and Lichens List. California Natural Diversity Database.
- CDFW. 2021d. California Wildlife Habitat Relationships System. Accessed via: <https://www.wildlife.ca.gov/data/cwhr> in February 2021.
- California Herps. 2021. A Guide to the Amphibians and Reptiles of California. Accessed via: <http://www.californiaherps.com> in February 2021.
- California Native Plant Society (CNPS). 2021a. Inventory of Rare and Endangered Plants of California. Online edition V8-03 0.39. Accessed via: <http://www.rareplants.cnps.org> in February 2021.
- California Native Plant Society (CNPS). 2020b. Considerations for Including CRPR 4 Plant Taxa in CEQA Biological Resource Impact Analysis. Adopted by the CNPS Rare Plant Program Committee 21 January 2020. Sacramento, California.
- City of San Luis Obispo (City). 2005 (September). Cerro San Luis Natural Reserve Open Space Conservation Plan. The Natural Resources Program.
- The Cornell Lab of Ornithology. 2021a. eBird. Accessed via: <https://ebird.org> in February 2021.
- The Cornell Lab of Ornithology. 2021b. All About Birds. Accessed via: <https://www.allaboutbirds.org> in February 2021.
- Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual. U.S. Army Engineer Waterways Experiment Station. Vicksburg, Mississippi.
- Gruver, J.C. and D.A. Keinath. 2006 (October 25). Townsend's Big-eared Bat (*Corynorhinus townsendii*): A Technical Conservation Assessment. Prepared for the USDA Forest Service, Rocky Mountain Region, Species Conservation Project.

- Hayes, M. P., and M. R. Jennings. 1989. Habitat correlates of the distribution of the California red-legged frog (*Rana aurora draytonii*) and the foothill yellow-legged frog (*Rana boylei*): Implications for management. Pages 144-158 in R. E. Szaro, K. E. Severson and D. R. Patton (technical coordinators). Management of amphibians, reptiles and small mammals in North America. July 19-21, 1988 - Flagstaff, Arizona. USDA General Technical Report RM-166:1-458.
- Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. California Department of Fish and Game, Sacramento, California.
- Hoover, R.F. 1970. The Vascular Plants of San Luis Obispo County, California. University of California Press, Berkeley, California.
- Jennings, M. R., and M. P. Hayes. 1994. Amphibian and reptile species of special concern in California, 1 November 1994. CDFG, Inland Fisheries Division, Rancho Cordova, CA. 255 pp.
- Jepson Flora Project (editors). 2021. Jepson eFlora. The Jepson Herbarium, University of California, Berkeley. Accessed via: <http://ucjeps.berkeley.edu/eflora/> in February 2021.
- Moyle, P.B., R.M. Quinones, J.V. Katz, and J. Weaver. 2015. Fish Species of Special Concern in California, Third Edition. California Department of Fish and Wildlife, Sacramento.
- Natural Resources Conservation Service (NRCS). 2021. Web Soil Survey. National Cooperative Soil Survey, U.S. Department of Agriculture. Accessed via: <http://websoilsurvey.nrcs.usda.gov/> in February 2021.
- Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento, California.
- Thompson, R.C., A.N. Wright, and H.B. Shaffer. 2016. California Amphibian and Reptile Species of Special Concern. University of California Press, Oakland, California.
- The Tricolored Blackbird Working Group. 2007. Conservation Plan for the Tricolored Blackbird (*Agelaius tricolor*). Susan Kester (editor). Sustainable Conservation, San Francisco, California.
- United States Army Corps of Engineers (USACE). 2008a. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0). J.S. Wakely, R.W. Lichvar, and C.V. Noble (editors). ERDC/EL TR-08-28. U. S. Army Engineer Research and Development Center, Vicksburg, MS.
- United States Fish and Wildlife Service (USFWS). 2000 (January). Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants.
- 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 75(51):12816-12959.
- United States Fish and Wildlife Service (USFWS). 2021a. National Wetlands Inventory. U.S. Department of the Interior, Washington, D.C. Accessed via: <https://www.fws.gov/wetlands/data/Mapper.html> in February 2021.
- United States Fish and Wildlife Service (USFWS). 2021b. Threatened and Endangered Species Active Critical Habitat Report. ECOS Environmental Conservation Online System. Accessed via: <https://ecos.fws.gov> in February 2021.
- Wilkerson, R.L. and R.B. Siegel. 2010. Assessing changes in the distribution and abundance of burrowing owls in California, 1993-2007. Bird Populations 10:1-36.
- Yasuda, C. 2012 (May). California Legless Lizard, *Anniella pulchra*. Species Account. U.S. Forest Service.

APPENDIX A

Site Plans





- SITE CONSTRUCTION NOTES:**
- 1 SIDEWALK UNDERDRAIN PER CITY OF SAN LUIS OBISPO STANDARD 3410.
 - 2 DRIVEWAY PER SAN LUIS OBISPO CITY STANDARD 2110, 2120 AND 2130.
 - 3 PROPOSED 2' MAX SEAT WALL
 - 4 EXISTING 6' STUCCO SITE WALL TO REMAIN
 - 5 PROPOSED 3' MAX RETAINING WALL
 - 6 EXISTING DRIVEWAY TO BE REMOVED
 - 7 EXISTING POWER POLE TO REMAIN
 - 8 EXISTING AC PAVEMENT AND AC DIKE
 - 9 EXISTING PARKING LOT TO BE REMOVED
 - 10 EXISTING TREES TO REMAIN, SEE SHEET C-0.0
 - 11 EXISTING TREES TO BE RELOCATED, SEE SHEET C-0.0
 - 12 PROPOSED DOMESTIC WATER LINE
 - 13 PROPOSED FIRE LINE WITH DCDA
 - 14 PROPOSED SEWER LINE
 - 15 PROPOSED SIGN PER ARCH AND LANDSCAPE PLANS (TYP) HEIGHT AND SETBACK AS NEEDED FOR SIGHT DISTANCE
 - 16 PROPOSED RAMP
 - 17 PROPOSE PERVIOUS PAVER SURFACE
 - 18 EXISTING BRIDGE TO BE PROTECTED
 - 19 PROPOSED STAIRS
 - 20 PROPOSED TRASH ENCLOSURE WITH DRAIN TO LANDSCAPE AREA
 - 21 EXISTING FIRE LINE WITH BPF TO FH ON BUILDING A SITE AND EXISTING FIRE LINE WITH DCDA TO OAKS
 - 22 REMOVE AND REPLACE EXISTING ADA CURB RAMP.
 - 23 PROPOSED BULBOUT WITH COORDINATION WITH CITY TRAFFIC ENGINEERING
 - 24 PROPOSED SIDEWALK PER CITY STANDARDS
 - 25 REMOVE AND REPLACE CROSSWALK FLASHERS
 - 26 EXISTING TREE TO BE REMOVED, SEE SHEET C-0.0
 - 27 PROPOSED PERVIOUS PATH PER LANDSCAPING
 - 28 PROPOSED CONCRETE WALKWAY
 - 29 PROPOSED CURB
 - 30 PROPOSED GREASE INTERCEPTOR
 - 31 PROPOSED F.O.G. AREA DRAIN TO SEWER. NOTE AREA TO HAVE SOLID ROOFING
 - 32 PROPOSED 6' SITE WALL PER ARCHITECT PLANS

- EXISTING EASEMENTS**
- 1 ROAD AND UTILITY EASEMENT PER 1452 O.R. 528
 - 2 10' SEWER EASEMENT PER 1433 O.R. 127
 - 3 10' WATER PIPELINE EASEMENT PER 1333 O.R. 684
 - 4 AREA SUBJECT TO INUNDATION AND PUBLIC DRAINAGE AND MAINTENANCE EASEMENT PER 24 PM 88
 - 5 WATERLINE EASEMENT PER INST. 1999-054359, 54 PM 79
 - 6 6' BRIDGE EASEMENT PER 2018-021948
 - 7 10' SEWER EASEMENT PER 635 O.R. 173
 - 8 10' SEWER EASEMENT PER 1341 O.R. 9
 - 9 9.84' TREE EASEMENT PER SL 96-157
 - 10 6' PUBLIC UTILITY EASEMENT PER SL 96-157
 - 11 PARKING AGREEMENT PER 1997-059991 TO BE ADJUSTED
 - 12 APPROX. CL EX. STORM DRAIN AND CL EASEMENT PER 24 PM 88.

57,000 SF DISTURBED AREA (SWPPP REQUIRED)

EARTHWORK:
 1575 CY CUT
 620 CY FILL
 7.0' MAX CUT
 13.0' MAX FILL

LID STORMWATER REQUIREMENTS, TIER 4 PROJECT UTILIZES:
 • DISCONNECTED DOWNSPOUTS
 • PERVIOUS PAVING

PEDESTRIAN IMPROVEMENT NOTE:
 PROJECT WILL BE REQUIRED TO IMPLEMENT THE PEDESTRIAN IMPROVEMENTS IDENTIFIED IN THE ANHOLM NEIGHBORHOOD GREENWAY. THESE IMPROVEMENTS ARE ELIGIBLE FOR TIF CREDITS

PROPERTY LINE NOTE:
 LOT LINES SHOWN HEREON PER SLO AL20-0002

SEWER GENERATION TABLE	AVERAGE DRY-WEATHER FLOW (ADWF) gpd	PEAKING FACTOR (PER CITY OF SLO DESIGN STANDARD 7.1-1)	PEAK DRY-WEATHER FLOW (PDWF) gpd
BUILDING A			
MULTI-FAMILY RESIDENTIAL UNITS	54	4.36	24728.52
COMMERCIAL SPACE AREA (sq.ft.)	4633	5.89	1639.03
TOTAL	998		26367.55
BUILDING B			
MULTI-FAMILY RESIDENTIAL UNITS	22	4.77	11021.08
COMMERCIAL SPACE AREA (sq.ft.)	3789	6.02	1367.67
TOTAL	2538		12388.75
PROJECT TOTAL	8496		38756.30

PDA NOTE:
 ALL SETBACK LINES SHOWN ARE PER R-4 ZONE PER CITY OF SLO 2019 ZONING ORDINANCE. MODIFICATIONS FOR PROPOSED NON-CONFORMING BUILDING AND SITE IMPROVEMENTS ARE REQUESTED VIA PLANNED DEVELOPMENT AMENDMENT PDEV-0001-2021.

REVISED 3/12/21 SHEET C-1.0 INSERT

ASHLEY & VANCE
 ENGINEERING, INC.

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PRELIMINARY #:
 ARCH-0386-2020
 USE-0387-2020
 PDEV-0001-2021

THE VILLAGE AT THE PALMS
 55 BROAD ST
 SAN LUIS OBISPO, CA 93405

Project: _____

Revisions:

1	Legless Lizard Bldg B Site Rev.

Proj. Engr.: JMA Phone Ext.: 156
 Proj. Mgr.: GSF Phone Ext.: 149
 Date: 11.20.2020 Scale: PER PLAN
 A&V Job No.: 181183 Sheet Size: 24 x 36

GRADING AND UTILITY SHEET

C-1.0

APPENDIX B

List of Plants and Animals Observed During the Site Visit



Appendix B. List of Plants and Animals Observed Onsite During the Site Visit

Scientific Name	Common Name
Plants	
<i>Agapanthus</i> sp.*#	Cottonwood (not <i>trichocarpa</i> or <i>fremontii</i>)
<i>Aloe</i> spp.*#	Aloes
<i>Avena</i> sp.*	Wild oat
<i>Baccharis pilularis</i>	Coyote brush
<i>Brassica nigra</i> *	Black mustard
<i>Camellia</i> sp.*#	Camellia
<i>Cynodon dactylon</i> *	Bermuda grass
<i>Cyperus eragrostis</i>	Tall flatsedge
<i>Digitalis</i> sp.*#	Foxglove
<i>Echium</i> sp.*#	Echium
<i>Erodium botrys</i> *	Big heron bill
<i>Euphorbia peplus</i> *	Petty spurge
<i>Festuca myuros</i> *	Rattail sixweeks grass
<i>Festuca perennis</i> *	Italian rye grass
<i>Frangula californica</i> #	California coffeeberry
<i>Geranium</i> sp.*#	Geranium
<i>Hedera helix</i> *#	English ivy
<i>Heteromeles arbutifolia</i> #	Toyon
<i>Hirschfeldia incana</i> *	Summer mustard
<i>Hydrangea</i> sp.*#	Hydrangea
<i>Juglans californica</i>	Southern California black walnut
<i>Lavandula angustifolia</i> *#	Lavender
<i>Liquidambar</i> sp.*#	Sweetgum
<i>Lonicera hispidula</i>	Honeysuckle
<i>Medicago polymorpha</i> *	California burclover
<i>Myoporum laetum</i> *#	Myoporum
<i>Oxalis pes-caprae</i> *	Bermuda buttercup
<i>Pennisetum clandestinum</i> *#	Kikuyu grass
<i>Pittosporum</i> sp.*#	Cheesewood
<i>Quercus agrifolia</i>	Coast live oak
<i>Rosa</i> sp.*#	Rose (various ornamental)
<i>Salix lasiolepis</i>	Arroyo willow
<i>Salvia leucantha</i> *#	Mexican bush sage
<i>Toxicodendron diversilobum</i>	Poison oak
<i>Ulnus</i> sp.	Elm (planted)
<i>Washingtonia</i> spp.*#	Palms (various)
Animals	
<i>Aphelocoma californica</i>	California scrub jay
<i>Calypte anna</i>	Anna's hummingbird
<i>Corvus brachyrhynchos</i>	American crow
<i>Danaus plexippus</i>	Monarch butterfly
<i>Mimus polyglottos</i>	Northern mockingbird
<i>Pipilo maculatus</i>	Spotted towhee
<i>Regulus calendula</i>	Ruby-crowned kinglet
<i>Sayornis nigricans</i>	Black phoebe
<i>Streptopelia decaocto</i> *	Eurasian collared dove
<i>Zonotrichia leucophrys</i>	White-crowned sparrow

*Non-native species

#Planted in developed and/or ornamental areas

Bold = special-status species

APPENDIX C

Photo Plate



Photo Plate

Photo 1. Southerly view of parking lot/creek interface where Building A will be constructed. Top of bank area along parking lot has been planted with palms and some native trees along with non-native landscaping in the understory.



Photo 2. Southerly view of parking lot/creek interface where Building B will be constructed. A mix of native and non-native horticultural species are planted in this area.



Photo 3. Close up view of turf and landscaping on the east side of the creek with non-native English ivy growing throughout the area.



Photo 4. Representative view of the incised creek channel with larger trees in the top of bank area. Note scour and vegetation laying down from recent high flows with 2 to 6 inches of flowing water present.



Photo 5. Some parts of the channel may have been armored during construction in this area. Flowing water was present and it ranged from 2 to 6 inches deep.



Photo 6. Northerly view of Building A parking lot with mature trees along the top of bank creating the riparian corridor of varying structure.



Photo 7. Several areas along the creek corridor were composed of dense vegetation consisting of willows, young black walnut, large alders, honeysuckle, and English ivy.



Photo 8. Representative view of the narrow creek corridor looking from east to west towards the Building A parking lot. Most of the site is composed of limbed up trees with good visibility through the creek zone.

APPENDIX D

Special-status Biological Resources Summary



Appendix D - Special-status Biological Resources Summary Table

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
PLANTS						
Adobe sanicle	<i>Sanicula maritima</i>	—	R	1B.1	Perennial herb; chaparral, coastal prairie, meadows and seeps, valley and foothill grassland on clay and serpentine soils; 30-240 meters in elevation; blooms February to May.	Not expected. No suitable grassland habitat is present, and no serpentine influence was observed on the site. The site is within the species' elevational range, and has been recorded at several locations nearby, including Cerro Romualdo, Laguna Lake, South Hills Open Space and Bishop Peak, but no suitable habitat is present and species was not observed during survey.
Aparejo grass	<i>Muhlenbergia utilis</i>	—	—	1B.2	Perennial bunch grass; coastal scrub, creosote bush scrub, wetlands and riparian; 250-1000 meters in elevation; blooms October to May.	Not expected. Potentially suitable wetland/riparian habitat is present along creek corridor, but the site is outside of the elevational range of the species and there is only one record nearby at Camp SLO. Not observed during survey.
Betty's dudleya	<i>Dudleya abramsii</i> ssp. <i>bettinae</i>	—	—	1B.2	Perennial herb; chaparral, coastal scrub and valley and foothill grassland on rocky, serpentine soils; 20-180 meters in elevation; blooms May to July.	Not expected. Species is restricted to serpentine rock outcrops, which are not present onsite. Perennial species would have been seen during the surveys.
Blochman's dudleya	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	—	—	1B.1	Perennial herb; coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grassland on rocky, often clay or serpentine soils and sandstone rock outcrops; 5 - 450 meters in elevation; blooms April to June.	Not expected. Species is associated with rocky areas or thin layers of clay soils over serpentine rock, which is not present onsite. Species would have been seen during the surveys.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Brewer's spineflower	<i>Chorizanthe breweri</i>	—	—	1B.3	Annual herb; coniferous forest, chaparral, cismontane woodland and coastal scrub on serpentinite or gravelly soils; 45-800 meters in elevation; blooms April to August.	Not expected. No suitable soils or serpentine rock outcroppings are present. Numerous records nearby and the site is within the species distribution, but not observed during survey.
California (southern) black walnut	<i>Juglans californica</i>	—	—	4.2	Deciduous tree that naturally occurs along rivers and streams. Planted and hybridized throughout California and occurs in landscaped and natural settings.	Present. Several young specimens observed along the creek corridor that may have been planted.
Cambria morning-glory	<i>Calystegia subacaulis</i> ssp. <i>episcopalis</i>	—	—	4.2	Perennial rhizomatous herb; chaparral, cismontane woodland, coastal prairie, and valley and foothill grassland usually on clay soils; 30-500 meters in elevation; blooms March to July.	Not expected. No suitable grassland habitat present, and site is highly disturbed.
Chaparral ragwort	<i>Senecio aphanactis</i>	—	—	2B.2	Annual herb; chaparral, cismontane woodland, coastal scrub in drying alkaline flats; 15-800 meters in elevation; blooms January to April.	Not expected. No suitable soils are present onsite. All records in the vicinity are from sites with serpentine soils. Not observed during survey.
Chorro Creek bog thistle	<i>Cirsium fontinale</i> var. <i>obispoense</i>	E	E	1B.2	Perennial herb; chaparral, cismontane woodland, coastal scrub, valley and foothill grassland in seeps and drainages with serpentine; 35-385 meters in elevation; blooms February to September.	Not expected. No suitable soils or serpentine seep habitat are present, Occurs at Laguna Lake, Irish Hills and in the hills on the north side of Hwy. 1 on Camp San Luis Obispo. Not observed during survey.
Congdon's tarplant	<i>Centromadia parryi</i> ssp. <i>congdonii</i>	—	—	1B.1	Annual herb; valley and foothill grassland and disturbed sites on alkaline soils; 0-230 meters in elevation; blooms May to November.	Not expected. No suitable grassland habitat on clay soils is present, and no topographic depressions or seasonal wetlands capable of supporting this species were observed. Has been recorded in seasonal wetlands at Laguna Lake and Camp SLO. Would not occur in riparian habitat along the creek.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Cuesta Pass checkerbloom	<i>Sidalcea hickmanii</i> ssp. <i>anomala</i>	—	R	1B.2	Perennial herb; closed-cone coniferous forest and chaparral on rocky, serpentine soil; 600-800 meters in elevation; blooms May to June.	Not expected. No suitable habitat or soils are present and the site is greatly outside of the species' elevational range. Generally restricted to West Cuesta Ridge, but one record from Camp SLO at lower elevation.
Cuesta Ridge thistle	<i>Cirsium occidentale</i> var. <i>lucianum</i>	—	—	1B.2	Perennial herb; openings in chaparral, steep rocky slopes and disturbed roadsides; 500-750 meters in elevation; blooms April to June.	Not expected. No suitable habitat is present, the site is greatly outside of the species' elevational range and restricted distribution.
Dwarf soaproot	<i>Chlorogalum pomeridianum</i> var. <i>minus</i>	—	—	1B.2	Perennial bulbiferous herb; chaparral on serpentine soils; 305-1000 meters in elevation; blooms May to August.	Not expected. No suitable habitat or soils are present, and the site is greatly outside of the species' elevational range.
Eastwood's larkspur	<i>Delphinium parryi</i> ssp. <i>eastwoodiae</i>	—	—	1B.2	Perennial herb; chaparral and valley and foothill grassland generally in serpentine soils; 75-500 meters in elevation; blooms February to March.	Not expected. No suitable soils are present as there is no serpentine influence on the property. Several records in foothills in the region, and the site is within the species' local distribution and elevational range. Not observed during survey.
Hooked popcornflower	<i>Plagiobothrys uncinatus</i>	—	—	1B.2	Annual herb; chaparral, cismontane woodland, valley and foothill grassland, and coastal bluff scrub in sandy soils; 300-730 meters in elevation; blooms April to May.	Not expected. No suitable soils are present and the site is greatly outside of the elevational range of the species.
Hoover's bent grass	<i>Agrostis hooveri</i>	—	—	1B.2	Stoloniferous perennial herb; chaparral, cismontane woodland, and valley and foothill grassland habitats in sandy soils; 60-600 meters in elevation; blooms April to July.	Not expected. No suitable soils are present and the site is outside of the species' local distribution. Has been recorded in the region, but generally in more mountainous areas with chaparral habitats on sandy soils and there are no records from the City of SLO area. Not observed during survey.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Hoover's button-celery	<i>Eryngium aristulatum</i> var. <i>hooveri</i>	—	—	1B.1	Herb that can occur as either an annual or a perennial; vernal pools, seasonally wet grasslands, and roadside ditches; 3-45 meters in elevation; blooms June to August.	Not expected. No suitable seasonal wetland or topographic depression habitat present onsite. Records in the southern and southwestern San Luis Obispo area such as Tank Farm property.
Irish Hills spineflower	<i>Chorizanthe aphanantha</i>	—	—	1B.1	Annual herb; openings in chaparral and restricted to serpentine; approx. 305 meters in elevation; blooms from April to August.	Not expected. Known only from a very restricted area in the Irish Hills to the southwest of San Luis Obispo; no suitable habitat or serpentine soils are present.
Jones' layia	<i>Layia jonesii</i>	—	—	1B.2	Annual herb; chaparral and valley and foothill grassland on clay or serpentine; 5-400 meters in elevation; blooms March to May.	Not expected. No suitable serpentine based soils are present onsite. The site is within the species' elevational range, and records from serpentine rock and soils are near the site, including Camp SLO, O'Connor Way, CalPoly, and an historic record at the base of Bishop Peak. Not observed during surveys.
La Panza mariposa-lily	<i>Calochortus simulans</i>	—	—	1B.3	Perennial bulbiferous herb; chaparral, cismontane woodland, lower montane coniferous forest, and valley and foothill grassland on sandy and often granitic soils and sometimes on serpentine; 325-1150 meters in elevation; blooms April through June.	Not expected. The site is slightly outside the local and elevational range of the species, frequent disturbance would preclude this species, and the site survey was conducted when the species was blooming in the area and was not seen.
Mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	—	—	1B.1	Perennial herb; chaparral, cismontane woodland, and coastal scrub on sandy or gravelly soils; 70- 810 meters in elevation; blooms February to September.	Not expected. No suitable soils or coastal scrub habitat are present. Site is within the species' known range, but there are no records from the San Luis Obispo area. Not observed during survey.
Miles' milk-vetch	<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	—	—	1B.2	Annual herb; coastal scrub habitats with clay soils; 20-90 meters in elevation; blooms March to June.	Not expected. No suitable habitat present onsite, and creek corridor would not be expected to support this species.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Most beautiful jewelflower	<i>Streptanthus albidus</i> ssp. <i>peramoenus</i>	—	—	1B.2	Annual herb; chaparral, cismontane woodland, and valley and foothill grassland on serpentine soils; 94-1000 meters in elevation; blooms March to October.	Not expected. No suitable soils are present and the species' is usually at higher elevations than what occur onsite. Recorded from mountains and hills in the region but not observed during survey.
Mouse-gray dudleya	<i>Dudleya abramsii</i> ssp. <i>murina</i>	—	—	1B.3	Perennial leaf succulent; chaparral, cismontane woodland and valley and foothill grassland on serpentine soils; 50-525 meters in elevation; blooms May to June.	Not expected. Species is restricted to serpentine rock outcrops, which are not present onsite. Perennial species would have been seen during the surveys.
Ojai fritillary	<i>Fritillaria ojaiensis</i>	—	—	1B.2	Perennial bulbiferous herb; broad-leaved upland forest, chaparral, cismontane woodland, and lower montane coniferous forest on rocky soils; 225-998 meters in elevation; blooms February to May.	Not expected. No suitable habitat or soils are present and the site is outside of the elevational range of this species. No fritillary species observed during the survey.
Oso manzanita	<i>Arctostaphylos osoensis</i>	—	—	1B.2	Perennial evergreen shrub; chaparral and cismontane woodland on dacite porphyry buttes; 95-500 meters in elevation; blooms February to March.	Not expected. No suitable habitat or soils are present, and no native (non-planted) manzanita shrubs were seen during the surveys.
Palmer's mondardella	<i>Monardella palmeri</i>	—	—	1B.2	Perennial herb; chaparral and cismontane woodland on serpentine soils; 200-800 meters in elevation; blooms June to August.	Not expected. No suitable soils are present and the site is outside of the elevational range of this species. Recorded in surrounding mountainous area.
Pecho manzanita	<i>Arctostaphylos pechoensis</i>	—	—	1B.2	Perennial evergreen shrub; coniferous forest, chaparral and coastal scrub on siliceous shale soils; 125-850 meters in elevation; blooms November to March.	Not expected. No suitable soils are present, the site is outside of the species' elevational range, no manzanita shrubs were seen during the surveys and the only record in the region has an imprecise location from 1970.
Pismo clarkia	<i>Clarkia speciosa</i> ssp. <i>immaculata</i>	E	R	1B.1	Annual herb; margins and openings of chaparral, cismontane woodland, and valley and foothill grassland in sandy soils; 25-185 meters in elevation; blooms May to July.	Not expected. Site is outside of the restricted distribution of this species and no sandy soils are present.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Saline clover	<i>Trifolium hydrophilum</i>	—	—	1B.2	Annual herb; marshes and swamps, mesic valley and foothill grassland, and vernal pools on alkaline soils; 0-300 meters in elevation; blooms April to June.	Not expected. No suitable habitat present, and creek corridor would not provide suitable habitat.
San Benito fritillary	<i>Fritillaria viridea</i>	—	—	1B.2	Perennial bulbiferous herb; chaparral and cismontane woodland on rocky serpentine slopes, streambanks and roadsides; 200-1525 meters in elevation; blooms March to May.	Not expected. No suitable habitat or soils are present, the site is outside of the species' elevational range, and the only records in the vicinity is from 1925 and 1964.
San Luis mariposa-lily	<i>Calochortus obispoensis</i>	—	—	1B.2	Bulbiferous, perennial herb; chaparral, coastal scrub and valley and foothill grassland on sandstone, serpentine and/or sandy soils; 75-730 meters in elevation; blooms May to July.	Not expected. No suitable serpentine based soils are present and although there are records in the general area, they are from more mountainous areas with rock outcroppings. Not observed during survey.
San Luis Obispo ceanothus	<i>Ceanothus thyrsiflorus</i> var. <i>obispoensis</i>	—	—	1B.1	Perennial shrub; chaparral and cismontane woodland on dacite soils; 140-225 meters in elevation; blooms in June.	Not expected. Suitable habitat and soils are not present and the site is outside of the species' elevational range. Perennial shrub would have been seen during the survey.
San Luis Obispo owl's-clover	<i>Castilleja densiflora</i> var. <i>obispoensis</i>	—	—	1B.2	Annual herb; meadows, seeps, and valley and foothill grassland sometimes on serpentine; 10-400 meters in elevation; blooms March to May.	Not expected. No suitable grassland habitat is present onsite. Creek corridor is not expected to provide necessary habitat for this species.
San Luis Obispo sedge	<i>Carex obispoensis</i>	—	—	1B.2	Perennial herb; coniferous forest, chaparral, coastal prairie, coastal scrub, valley and foothill grassland, often on serpentine and clay soils in seeps; 10-820 meters in elevation; blooms April to June.	Not expected. No suitable serpentine based soils are present onsite. While numerous records are in the region, all occurrences are at higher elevations and associated with serpentine based seeps along the Santa Lucia Mountains, Irish Hills or other foothill locations. Not observed during survey.
Santa Lucia manzanita	<i>Arctostaphylos luciana</i>	—	—	1B.2	Perennial evergreen shrub; chaparral and cismontane woodland on shale soils; 350-850 meters in elevation; blooms December to March.	Not expected. No suitable habitat or soils are present, the site is greatly outside of the species' elevational range, and no native manzanitas were found during survey.

Common Name	Scientific Name	Fed	CA	CRPR	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Santa Margarita manzanita	<i>Arctostaphylos pilosula</i> (=A. wellsii)	—	—	1B.2	Evergreen perennial shrub; occurs in closed-cone coniferous forests, broad-leaved upland forest, cismontane woodland, and maritime chaparral sometimes on sandstone; ranges from 75 to 1100 meters in elevation; blooms December to May.	Not expected. No suitable soils or habitat are present, and no native manzanitas were found during the survey.
Straight-awned spineflower	<i>Chorizanthe rectispina</i>	—	—	1B.3	Annual herb; openings in chaparral, cismontane woodland, coastal scrub on granite sand or disintegrating shale and tolerates disturbance; 85-1035 meters in elevation; blooms April to July.	Not expected. No suitable habitat or soils are present, and only one record from nearby is from 1885. Not observed during survey.

*E = Endangered; T = Threatened; R = Rare; '—' = no status; CRPR: Rank 1A - Presumed extirpated in California and either rare or extinct elsewhere; Rank 1B – Rare, threatened or endangered in California and elsewhere; Rank 2A – Presumed extirpated in California, but more common elsewhere; Rank 2B – Rare, threatened, or endangered in California, but more common elsewhere; Rank 3 - Plants needing more information, a review list; Rank 4 – Limited distribution, a watch list. Sources: California Natural Diversity Database (California Department of Fish and Wildlife 2021a); Special Vascular Plants, Bryophytes, and Lichens List (California Department of Fish and Wildlife 2021c); Inventory of Rare and Endangered Plants of California (California Native Plant Society 2021a); Information on Wild California Plants for Conservation, Education, and Appreciation (Calflora 2021).

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
ANIMALS						
INVERTEBRATES						
Atascadero June beetle	<i>Polyphylla nubila</i>	—	—	—	Sandy soils in annual grassland, chamise chaparral, and oak woodland and savannah. Restricted to Atascadero and San Luis Obispo.	Not expected. Onsite soils are not sandy and the only record from the vicinity is from 1956 and has an imprecise location.
California linderiella	<i>Linderiella occidentalis</i>	—	—	—	Seasonal pools or vernal pools in grasslands or in sandstone depressions. Can occur in very small pools and are heat tolerant.	Not expected. No topographic depressions capable of holding water are present, and species does not occur in flowing water, and therefore creek corridor is not suitable habitat.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Monarch butterfly	<i>Danaus plexippus</i> pop. 1	—	—	— (overwintering population)	Adults feed on the nectar of various blooming plants. During breeding can be found in fields, pastures, residential areas, grassland and scrub. Eggs are laid on and caterpillars feed on milkweed. Overwinters in wind-protected tree groves of eucalyptus, Monterey pine and cypress along the coast.	Potential. Individuals were seen flying around the study area during the survey. No suitable overwintering sites on the property given the relatively small narrow tree corridor along creek within urban areas of SLO.
Obscure bumble bee	<i>Bombus caliginosus</i>	—	—	—	Found on ceanothus, coyote brush, thistles, sweet peas, lupines, willows, clover and blackberry. Queens emerge from hibernation in late-January, workers appear in early-March, and males emerge in April. Colonies dissolve in late-October, with only the new queens surviving.	Potential. Potential host plants are in the study area. There are historic records from the vicinity, but little is known about this species.
San Luis Obispo pyrg	<i>Pyrgulopsis taylori</i>	—	—	—	Freshwater snail with planktonic larvae. Also has been recorded on rocks and in leaf litter.	Potential. Marginal habitat may be present in the onsite drainage, but it is intermittent and appears to dry down on a seasonal basis. Has been recorded nearby in Brizziolari and Chorro creeks, but those drainages have a larger watershed and are more perennial in nature.
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	T	—	—	Grasslands with temporary ponded water. Inhabits small clear-water depressions in rock, vernal pools and swales, as well as anthropogenic habitats such as tire ruts, dozer scrapes and railroad pools. Needs standing water for at least 18 days to complete its lifecycle.	Not expected. No topographic depressions capable of holding water are present, and species does not occur in flowing water. Known to occur in the south side of San Luis Obispo around the Tank Farm, but no records from along Hwy. 1.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Western bumble bee	<i>Bombus occidentalis</i>	—	CE	—	Generalist foragers and found on agricultural crops such as tomatoes, peppers, cranberries, alfalfa, avocado, apples, cherries, blackberries, and blueberries. Only females survive the winter and establish new colonies the following spring. Colonies contain one queen, female workers, larvae, and when the season nears, male and female reproductive members. Nests are underground in cavities or burrows.	Unlikely. Species has undergone substantial range reduction, and no longer occurs in central California. Historic record from 1936 from south of San Luis Obispo.
FISH						
South-central California coast DPS steelhead	<i>Oncorhynchus mykiss irideus</i> pop. 9	T	—	—	Adults spawn in freshwater streams with clear, well-oxygenated, cool water and clean gravel substrate. Also require instream cover (branches, logs) and streamside vegetation. Juveniles rear in freshwater reaches or lagoons before going to the ocean to mature, and then return to freshwater to reproduce.	Not expected. No suitable habitat is present in the study area. The reach of the unnamed drainage onsite is much too ephemeral to be used by this species. Creek is channelized downstream and traverses highly disturbed urban areas. Documented to occur in Chorro and San Luis Obispo creeks, but barriers and urban development along with ephemeral nature of creek are factors limiting use of this drainage by steelhead.
AMPHIBIANS/REPTILES						
Blainville's (=coast) horned lizard	<i>Phrynosoma blainvillii</i>	—	—	SSC	Grasslands, sandy washes, coastal scrub, chaparral, coniferous forest and woodlands with patches of open areas for sunning and bushes for cover. Often with loose sandy soils for burial, but also uses small mammal burrows. Preys on native species of ants and other small invertebrates.	Not expected. No suitable plant communities given developed nature of site. Generally absent from urban areas due to lack of undisturbed native habitat and presence of non-native ants associated with humans. No records nearby.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
California red-legged frog	<i>Rana draytonii</i>	T	—	SSC	Forages and breeds in streams with deep slow-moving pools, stock ponds, reservoirs, springs, lagoons, and marshes; usually with emergent or riparian vegetation but also found at sites lacking vegetation. Uses riparian and various upland habitats in winter and for dispersal.	Unlikely. The onsite drainage does not have sufficient water depth to support any lifestage. Has been recorded historically in Brizziolari Creek, but not observed since 1939. Known to occur throughout the Chorro Creek watershed. Potentially suitable ponds within 1 mile seen on aerial imagery to the NW and on CalPoly, but urban development and Hwy. 1 are likely significant barriers to upland movement. No suitable habitat in this urban area, so very unlikely to disperse or migrate through the site.
Coast Range newt	<i>Taricha torosa</i>	—	—	SSC	Primarily terrestrial in forests, oak woodlands, chaparral, and rolling grassland. Breeds in ponds, reservoirs and pools of clear streams with rocky substrates and cascades.	Not expected. Onsite drainage does not have sufficient amount of water or appropriate rocky habitat with pools and cascades. Has been recorded historically from Brizziolari Creek but not found on CalPoly for several decades.
Foothill yellow-legged frog - Central Coast population	<i>Rana boylei</i>	—	E	SSC	Rocky streams and rivers with open sunny banks, surrounded by forests, chaparral and woodlands. Sometimes found in isolated pools, backwaters, and spring-fed pools. Reproduction is exclusively in streams and rivers. Usually found near water and diurnal.	Not expected. No suitable habitat is present on or near the site. This species is considered to be extirpated south of Rocky Point in far northwestern SLO County. Historically recorded in Brizziolari Creek and Reservoir Canyon, but not found since 1958.
Lesser slender salamander	<i>Batrachoseps minor</i>	—	—	SSC	Forests composed of mixed oak, tanbark oak, sycamore and bay laurel with moist conditions. Found above 400 m elevation. Active above ground on warm, wet nights but otherwise is underground or under cover objects.	Not expected. Species has a very restricted distribution along the ridge of the Santa Lucia Mountain Range, and site is well below the elevational range and outside of the distribution of the species.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Northern California legless lizard	<i>Anniella pulchra</i>	—	—	SSC	Beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, oak woodland, and stream terraces with riparian vegetation. Fossorial species requires moist, loose soils or leaf litter with plant cover or surface objects (rocks, boards, logs, etc.). Can occur in residential areas.	Potential. The site is mostly developed, and soils onsite are not highly suitable for this fossorial species that typically occurs in sandy soils with coastal scrub, chaparral and oak woodland habitats. Riparian habitat is present onsite and includes oak trees with dense leaf litter and the area along the creek corridor could potentially support this species. Legless lizards have been recorded throughout the general area, but few records nearby.
Southwestern pond turtle (=western pond turtle)	<i>Actinemys pallida</i> (= <i>Emys marmorata</i>)	—	—	SSC	Ponds, lakes, rivers, streams, marshes, brackish lagoons, and irrigation ditches with a mosaic of vegetation and open areas for basking. Uses upland areas for nesting and in winter, including woodland, forest, grassland, chaparral, and grasslands.	Not expected. No suitable aquatic habitat is present on or near the site. The onsite drainage is too ephemeral and shallow to support this species. The nearest pond seen on aerial photography is well beyond (>4000 feet) the species' distance for upland habitat use. Would not cross Hwy. 1 or urban areas surrounding site. Recorded from Stenner and Chorro creeks on the north side of Hwy. 1.
BIRDS						
Bald eagle	<i>Haliaeetus leucocephalus</i>	—	E	FP	Open areas near water where they mainly feed on fish, and may also eat birds, amphibians, reptiles, small mammals, and crabs; nests in large mature trees such as ponderosa pine or occasionally on cliffs or the ground, within 1 mile of a large water source; occurs year-round in this area.	Not expected. Could potentially fly over the site but would not be expected to roost on large trees given the urban setting. Has been recorded in eBird from numerous locations in the vicinity, but unlikely to stopover at the site and would not be expected to nest.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Burrowing owl	<i>Athene cunicularia</i>	—	—	SSC (burrow sites & some wintering sites)	Open treeless areas with low sparse vegetation such as grasslands, deserts, pastures, agricultural fields, airports, and artificial embankments where they prey on small vertebrates and various invertebrates. Nests in burrows created by other animals with nearby lookouts such as fence posts or shrubs. Formerly occurred year-round in this area, but now restricted to winter.	Not expected. No suitable grassland habitat and no small mammal burrows observed. Species would not use the creek corridor for roosting or nesting habitat given it is a grassland species, and the high level of human presence in a developed area.
California horned lark	<i>Eremophila alpestris actia</i>	—	—	WL	Areas with sparse vegetation or bare ground in prairies, deserts, tundra, beaches, dunes, airports, plowed fields and heavily grazed pastures where they eat seeds and insects. Nesting is on bare ground. Occurs year-round in this area.	Not expected. No suitable grassland habitat present, and creek corridor and associated riparian habitat would not be used by this species.
Cooper's hawk	<i>Accipiter cooperii</i>	—	—	WL (nesting)	Mature and open woodlands including oak forest, conifers and riparian; may also be found in suburban areas with tall trees. Feeds on birds, small mammals, reptiles and amphibians. Nesting is in dense woodlands. Occurs in this area year-round.	Potential. Could forage, nest or roost onsite in the Riparian or Ornamental habitats. They have been recorded at numerous locations close to the site on CalPoly, Bishop's Peak and in urban areas nearby in eBird.
Ferruginous hawk	<i>Buteo regalis</i>	—	—	WL (wintering)	Open country such as grasslands, sagebrush, saltbush shrubland, and edges of pinyon-juniper forest where they prey on small mammals. Nests on lone trees, cliffs, utility poles, and shrubs from ground-level to 65-feet high. Occurs in this area during winter.	Potential. Potential foraging habitat is not present and does not nest in this area. Could perch or roost in Riparian or Ornamental habitats. There are several observations from open grassland habitats in the region in eBird, but these areas are much more extensive and connected to other open space areas compared to the urban setting of this site.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Golden eagle	<i>Aquila chrysaetos</i>	—	—	FP, WL (nesting & wintering)	Uncommon resident of mountainous and valley-foothill areas. Foraging typically occurs in open terrain where they prey on small mammals. Nesting usually occurs on cliff ledges, and less commonly in large trees or on structures such as electrical towers. Occurs in this area year-round.	Not expected. No suitable nesting or foraging habitat is present onsite given proximity to human activity and urban development. No large stick nests observed onsite characteristic of raptor use. Has been recorded at numerous locations on CalPoly and in open rangelands in region, but would not be expected to use creek corridor onsite.
Grasshopper sparrow	<i>Ammodramus savannarum</i>	—	—	SSC	Grasslands, prairies, hayfields, and open pastures with little scrub cover and some bare ground where they prey on grasshoppers and other invertebrates. Nests on the ground at the base of clumps of grass within a large patch of tall grass. Occurs in this area during breeding season.	Not expected. No suitable grassland habitat present. Creek corrido is not suitable for nesting or foraging activities for this species.
Great blue heron	<i>Ardea herodias</i>	—	—	— (nesting colony)	Freshwater and saltwater marshes, also foraging in grasslands and agricultural fields. Nesting colonies are near lakes, ponds and wetlands bordered by forests. Nests are placed mainly in trees, but may also nest on the ground, in bushes or artificial structures. Occurs year-round in this area.	Not expected. No suitable habitat present for this species to forage or nest onsite. Narrow creek corridor with dense vegetation would not be suitable for foraging, especially given the high level of human activity. There are numerous records in eBird from the region, but not in this particular area.
Great egret	<i>Ardea alba</i>	—	—	— (nesting colony)	Forages in marshes, swamps, streams, rivers, ponds, lakes, lagoons, tidal flats, canals, ditches, flooded fields, and sometimes in upland where they prey on fish, amphibians, reptiles, crustaceans, and invertebrates. Roosts communally in trees. Nesting colonies are on lakes, ponds, marshes, and estuaries, but does not nest in this area. Occurs in this area during non-breeding season.	Not expected. No suitable habitat present for this species to forage or nest onsite. Narrow creek corridor with dense vegetation would not be suitable for foraging, especially given the high level of human activity. There are numerous records in eBird from the region, but not in this particular area.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Loggerhead shrike	<i>Lanius ludovicianus</i>	—	—	SSC (nesting)	Open country with low vegetation and well-spaced shrubs or trees such as coastal scrub, grasslands, agricultural fields, pastures, riparian areas, desert scrub, savannas, prairies, golf courses, and along roadsides where they prey on insects, amphibians, reptiles and small mammals. Nests in trees, shrubs, or brush piles. Occurs in this area year-round.	Potential. Suitable Riparian and Ornamental habitats are present onsite. Could forage or nest onsite. There are several observations in eBird from CalPoly, downtown SLO, and Camp SLO.
Merlin	<i>Falco columbarius</i>	—	—	WL (wintering)	Coastlines, open grasslands, savannas, woodlands, lakes, wetlands, and montane conifer forests where they prey on small birds, small mammals and insects. Nests in existing corvid or hawk nest but does not nest in California. Occurs in this area during winter.	Not expected. No suitable habitat present for this species to forage onsite. Narrow creek corridor with dense vegetation would not be suitable for foraging, especially given the high level of human activity. Does not nest in the region.
Northern harrier	<i>Circus cyaneus</i>	—	—	SSC (nesting)	Large areas of wetlands and grasslands with low vegetation where they prey on small mammals, amphibians, reptiles and birds. Nesting is in marshes, grazed meadows, and desert shrubland where they nest on the ground in a dense clump of vegetation such as willows, grasses, sedge, bulrushes or cattails. Occurs year-round in this area.	Not expected. No suitable habitat present for this species to forage or nest onsite. Narrow creek corridor with dense vegetation would not be suitable for foraging, especially given the high level of human activity. There are numerous records in eBird from the region, but they are from grassland and wetland areas to the south and north of town.
Prairie falcon	<i>Falco mexicanus</i>	—	—	WL (nesting)	Grasslands, desert shrubland, tundra, coastal scrub, feedlots, and agricultural fields where they feed on small mammals, insects and birds. Nests on high cliff ledges, steep bluffs, trees, or on buildings or utility poles. Occurs year-round in this area.	Potential. Species could potentially nest in the tall trees along the riparian corridor. No stick nests indicative of raptors observed onsite. Has been recorded at CalPoly and various locations around the city.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Sharp-shinned hawk	<i>Accipiter striatus</i>	—	—	WL (nesting)	Forages along the edges of dense mixed woodlands and forests where they prey on birds. Nests are in dense forests with closed canopies in conifer trees. Occurs in winter in this area.	Potential. Suitable dense, although narrow, patches of riparian forest are onsite. Has been recorded at numerous locations surrounding the site during migration in eBird, including the neighborhoods surrounding the site. Could occur as a transient while migrating, but does not nest in this area.
Snowy egret	<i>Egretta thula</i>	—	—	— (nesting colony)	Lagoons, freshwater wetlands, ponds, temporary pools, and wet fields where they prey on aquatic animals and insects. Nesting colonies are in dense vegetation of islands and marshes. Occurs in this area outside of the breeding season.	Not expected. No suitable habitat present for this species to forage or nest onsite. Narrow creek corridor with dense vegetation would not be suitable for foraging, especially given the high level of human activity. There are numerous records in eBird from the region, but not in this particular area.
Tricolored blackbird	<i>Agelaius tricolor</i>	—	T	SSC (nesting colony)	Forages in a variety of habitats including pastures, agricultural fields, rice fields, and feedlots. Nests colonially in freshwater marshes with tules or cattails, or in other dense thickets of willow, thistle, blackberry, or wild rose in close proximity to open water. Occurs year-round in this area.	Potential. Nesting colonies have been recorded at several ponds along Hwy. 1 nearby. Could occur onsite as a transient while foraging, but would not nest onsite due to lack of sufficient water source or emergent vegetation to form colonial nests.
White-tailed kite	<i>Elanus leucurus</i>	—	—	FP (nesting)	Savannas, open woodlands (oak or pine), riparian forest, marshes, desert grasslands, and fields where they prey on small mammals, birds, lizards, and insects. Nests and roosts in the edges of forests or in tall isolated trees. Occurs in this area year-round.	Potential. Has been recorded at numerous locations on the CalPoly ag lands in close proximity to the site and in urban SLO, in eBird. Suitable foraging habitat is generally lacking, but could nest or roost in the Riparian or Ornamental habitats. No stick nests present indicative of raptors.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Yellow-billed magpie	<i>Pica nuttalli</i>	—	—	— (nesting & communal roosts)	Permanent residents of open oak woodland and savannah, riparian, valley hardwood-conifer, residential and agricultural areas, pastures and orchards. Feed on the ground on insects, invertebrates, trash, carrion, acorns, fruit, grain, nestlings, eggs, earthworms, ticks and live rodents. Nests and roosts in small colonies high in large trees. Occurs year-round in this area.	Unlikely. Riparian habitat is very narrow and adjacent to existing human development. No communal roosts are recorded nor were any nest occurrences observed that would indicate this species has occurred onsite. Generally more common north of Cuesta Grade, and not observed during survey of the site.
Yellow warbler	<i>Setophaga petechia</i>	—	—	SSC	Wetland and riparian habitats with willows, cottonwoods, aspens, sycamores and alders where they eat insects. Also uses gardens, orchards and roadside thickets. Nesting is in shrubs or small trees. Occurs year-round in this area.	Potential. Could forage or nest in the Riparian or Ornamental habitats onsite. Has been recorded in the region in eBird. Not observed during survey of the site.
MAMMALS						
American badger	<i>Taxidea taxus</i>	—	—	SSC	Open grasslands, fields and the edge of scrub and woodland habitats; requires dry loose soils for burrowing and shelter and feeds on a variety of small mammals such as California ground squirrel and pocket gopher.	Not expected. No suitable habitat present given highly urbanized nature of the project area, which likely precludes their occurrence. Highway 1 would be a barrier to their movement. No dens or ground squirrel burrows were seen during the survey.
Big free-tailed bat	<i>Nyctinomops macrotis</i>	—	—	SSC	Prefers rugged, rocky terrain and canyons. Roosts in buildings, caves, tree hollows, crevices in cliffs or rock outcrops. Feeds on moths. Occurs in California only during the winter, and is rare, found in areas with rugged rocky canyons.	Not expected. No suitable rocky habitat is present onsite, and the only record in the vicinity is from 1981. Low probability to occur as a transient during migrations.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Monterey dusky-footed woodrat	<i>Neotoma macrotis luciana</i>	—	—	SSC	Builds large stick middens in chaparral and woodland habitats of moderate canopy and moderate to dense understory. Occurs in the Coast Ranges from Monterey Bay to Los Osos/Atascadero. Reaches its eastern extent at Camp Roberts where it contacts <i>Neotoma fuscipes bullator</i> and southern extent where <i>Neotoma macrotis macrotis</i> occurs.	Not expected. The subspecies of dusky-footed woodrat in the San Luis Obispo area is reported to be <i>Neotoma macrotis macrotis</i> . No records were in the CNDDDB from the vicinity and no wood rat nests/middens were observed in the creek corridor.
Morro Bay kangaroo rat	<i>Dipodomys heermanni morroensis</i>	E	E	FP	Restricted to relict, stabilized sand dunes in Los Osos and Baywood Park, where they construct burrows in areas with low slope and compacted sandy soil. Associated with early seral stages of coastal dune scrub where there are patches of bare ground. Feeds on seeds. Has not been seen in the wild since 1986.	Not expected. Species is restricted to sand dune sheet that is not present onsite, and site is outside the local distribution of the species. Species may be extinct.
Pallid bat	<i>Antrozous pallidus</i>	—	—	SSC	Open dry habitats including deserts, grasslands, shrublands, woodlands, and forests. Roosts in rocky outcrops, caves, crevasses, mines, hollow trees, and buildings that moderate temperature. Night roosts on porches and open buildings.	Potential. Could forage over the site and night roost in the structures. Has been recorded on Camp SLO and the city downtown area, and could day roost in the trees in riparian corridor.
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	—	—	SSC	Moderate to dense coastal scrub, especially in rocky areas with slopes.	Not expected. The subspecies of dusky-footed woodrat in the San Luis Obispo area is reported to be <i>Neotoma macrotis macrotis</i> . No records were in the CNDDDB from the vicinity and no wood rat nests/middens were observed in the creek corridor.

Common Name	Scientific Name	Fed	CA	CDFW	Ecological Information	Evaluation of Occurrence/ Site Suitability / Local Records
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	—	—	SSC	Desert scrub, grassland, sagebrush, chaparral, oak woodlands, riparian and coniferous forests; prefers mesic habitats and closely tied to rock cliffs with crevasses. Roosts in caves, cliffs, mines, tunnels and bridges.	Potential. Could forage onsite, but no structures for roosting are present. Roost sites have been recorded nearby at Camp SLO and Chorro Creek.
Western mastiff bat	<i>Eumops perotis californicus</i>	—	—	SSC	Desert scrub, coastal scrub, chaparral, oak woodland, and coniferous forest. Roosts colonially in rock crevasses, buildings, tunnels and in trees. Does not undergo seasonal migrations or prolonged hibernation, and is present in this area year-round.	Potential. Suitable foraging habitat is present onsite, and could roost in buildings or large trees. Has been recorded in the San Luis Obispo area.

*E = Endangered; T = Threatened; C = Candidate; SSC = Species of Special Concern; FP = Fully Protected; WL = Watch List; '—' = no status; California Natural Diversity Database (California Department of Fish and Wildlife 2020a); Special Animals List (California Department of Fish and Wildlife 2019); California Wildlife Habitat Relationships System (CDFW 2021d); A Guide to the Amphibians and Reptiles of California (California Herps 2021); eBird (The Cornell Lab of Ornithology 2021a); All About Birds (The Cornell Lab of Ornithology 2021b); Guide to North American Birds (Audubon 2021).

SENSITIVE NATURAL COMMUNITIES	
Central Coast Arroyo Willow Forest — State Rarity Rank S3.2	Absent. Dense closed-canopy forest characterized by arroyo willow (<i>Salix lasiolepis</i>) and/or Pacific willow (<i>S. lasiandra</i>). Occurs on moist to saturated sandy or gravelly soil in floodplains, low-gradient stream reaches and dune slack ponds. The riparian habitat onsite is dominated by coast live oak, and is more closely aligned with Central Coast Live Oak Riparian Forest.
Central Coast Live Oak Riparian Forest — State Rarity Rank 3.2	Present. Band of riparian on drier, outer floodplains along perennial streams between the more mesic cottonwood or willow-dominated communities and more xeric chaparral. Dominated by coast live oak (<i>Quercus agrifolia</i>) with a relatively open understory of grasses and mixed shrubs. Numerous ornamentals present in the creek corridor planted as part of site landscaping, several of which are highly invasive (i.e., English ivy). The riparian habitat onsite is dominated by coast live oak and also contains planted species, and is consistent with this community.

SENSITIVE NATURAL COMMUNITIES	
Central Coast Riparian Scrub — State Rarity Rank S3	Absent. A dense, shrubby streamside thicket dominated by any of several species of willows (<i>Salix</i> spp.) and has coyote brush (<i>Baccharis pilularis</i>) as a secondary component. Occurs on sand or gravel bars along rivers and streams with ground water close to the surface. Also present around dune slack ponds. The riparian habitat onsite is more closely aligned with Central Coast Live Oak Riparian Forest due to the dominance of coast live oaks.
Central Dune Scrub — State Rarity Rank S2.2	Absent. Restricted to coastal strip on stabilized backdunes. It is composed of low-growing scattered shrubs, subshrubs and herbs and is indicated by the presence of mock heather (<i>Ericameria ericoides</i>), beach blue lupine (<i>Lupinus chamissonis</i>), and beach sagewort (<i>Artemisia pycnocephala</i>). Site is located away from the coastline and this community is not present.
Central Foredunes — State Rarity Rank S1.2	Absent. Areas of sand accumulation that are exposed to onshore winds and sparsely vegetated by suffrutescent plant species including sand verbena (<i>Abronia</i> sp.), sea rocket (<i>Cakile</i> sp.), and primrose (<i>Camissonia</i> sp.). Site is located away from the coastline and beaches and this community is not present.
Central Maritime Chaparral — State Rarity Rank S2.2	Absent. Occurs on well-drained, sandy soils within the summer fog zone. Composed of sclerophyll shrubs dominated by one or more species of manzanita (<i>Arctostaphylos</i> spp.). No manzanita species occur on the site and this community is not present.
Coastal and Valley Freshwater Marsh — State Rarity Rank S2 and S3	Absent. Occurs in permanently flooded sites with freshwater and lacking significant flow, dominated by perennial, emergent vegetation such as bulrushes (<i>Scirpus</i> sp. and <i>Schoenoplectus</i> sp.) and cattails (<i>Typha</i> sp.). No areas of perennially ponded water were present, and no emergent vegetation was present onsite with sufficient cover to be consistent with this habitat type.
Coastal Brackish Marsh — State Rarity Rank S2.1	Absent. Occurs along the inland edges of coastal bays, lagoons and estuaries at the interface between saltwater and freshwater. Salinity may vary due to tides and seasonal freshwater runoff. It has dense cover by perennial emergent species such as bulrushes (<i>Scirpus</i> sp. or <i>Schoenoplectus</i> sp.), broadleaf cattail (<i>Typha latifolia</i>), sedges (<i>Carex</i> spp.) and saltgrass (<i>Distichlis spicata</i>). The site occurs away from the coast and does not have brackish water habitat.
Freshwater Seep — State Rarity Rank S3.2	Absent. Occurs in permanently moist or wet soil that seeps from surfacing groundwater or water table, usually within grassland or meadow communities. Composed of mainly perennial herbs, especially sedges (<i>Carex</i> spp.) and rushes (<i>Juncus</i> spp.). Ephemeral nature of onsite drainage did not have elements of this habitat type present.

SENSITIVE NATURAL COMMUNITIES	
Northern Coastal Salt Marsh — State Rarity Rank S3.2	Absent. This community occurs in sheltered inland margins of bays, lagoons and estuaries. These areas are subject to regular tidal inundation of salt water for at least part of the year. Salt-tolerant hydrophytes up to 1 meter tall for moderate to dense stands. Characteristic species include fleshy jaumea (<i>Jaumea carnosa</i>), Pacific cordgrass (<i>Spartina foliosa</i>), and pickleweed (<i>Salicornia</i> sp.). The site occurs away from the coast and tidally influenced habitat is not present.
Northern Interior Cypress Forest — State Rarity Rank S2.2	Absent. Occurs on dry, rocky, and often serpentine soils. Stands are open and scrubby, being maintained by fires. It is dominated by one or more native cypress species (<i>Hesperocyparis</i> spp.). Suitable soils and cypress are not present onsite.
Serpentine Bunchgrass — State Rarity Rank S2.2	Absent. Restricted to areas with serpentine soils. Dominated by native perennial bunchgrasses and herbs with low total cover. Characteristic species include needlegrass (<i>Stipa</i> spp.), California poppy (<i>Eschscholzia californica</i>), and small fescue (<i>Festuca microstachys</i>), with a higher percentage of native grasses compared to other California grassland communities. No suitable serpentine soils occur, which is required to support this community.
Valley Needlegrass Grassland — State Rarity Rank S3.1	Absent. Often occurs on clay soils that are moist or saturated in winter and very dry in the summer. It is dominated by purple needlegrass (<i>Stipa pulchra</i>), but may have higher percent cover overall by native and introduced annual grassland species. No grassland habitat composed of native bunchgrasses is present.
Vernal Marsh — State Rarity Rank S2	Absent. Vegetated by low, annual herbs such as sedges (<i>Carex</i> spp.) and rushes (<i>Juncus</i> spp.). Has marshy conditions or standing water following winter rains but is reduced or completely dry by summer. Often found at the transition between Coastal and Valley Freshwater Marsh and drier upland grassland. Species characteristic of this community were not present with sufficient cover to meet this habitat type description.

Sources: Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986); California Natural Community List (California Department of Fish and Wildlife 2021b); California Natural Diversity Database (California Department of Fish and Wildlife 2021a).

DESIGNATED CRITICAL HABITAT	
California Red-legged Frog	Present. Unit SLO-3 is present in the area that the study site occurs along southern-most boundary. Onsite drainage does not contain critical habitat attributes and was determined to not support suitable habitat for this species.

Source: Threatened and Endangered Species Active Critical Habitat Report (United States Fish and Wildlife Service 2021b).