

Lucy Macmillan, M.S.
Environmental Scientist

108 Rising Road
Mill Valley, CA 94941
(p): 415-389-9199
(c): 415-244-6296

September 15, 2021

Mr. Tom Smith
Ghilotti Construction Company Inc.
246 Ghilotti Avenue
Santa Rosa, CA 95407

**Re: California Tiger Salamander and Biological Resource Issues
Ghilotti Use Permit Application UPE01-0181
Santa Rosa, Sonoma County, California**

Dear Mr. Smith:

At your request, this letter serves to provide updated information presented in a letter I prepared on January 22, 2021 in response to comments in a letter from the California Department of Fish and Wildlife (CDFW) to the Sonoma County Permit Resource and Management Department on October 19, 2020 regarding the proposed Use Permit application (UPE01-0181) for Ghilotti Construction Company's construction yard project at 304 Todd Road in Santa Rosa, Sonoma County, California. The project is being considered by the County for a Mitigated Negative Declaration (MND) pursuant to the California Environmental Quality Act (CEQA).

Comments raised by CDFW included but were not limited to potential impacts to California tiger salamander and special-status plants as a result of the proposed project. In response to those comments, Ms. Dana Riggs, Principal Wildlife Biologist with Sol Ecology, prepared a California tiger salamander habitat (CTS) assessment for the project site. The CTS assessment responds to CDFW's request for additional information regarding CTS and potential impacts associated with the proposed project. It was determined that no impact to wetlands nor CTS breeding habitat is anticipated from the proposed project. The assessment is attached as a stand alone document to this letter.

In addition, special-status plant surveys were also conducted on the project site with a focus on the drainage ditches that occur outside of the proposed project area along the perimeter given these areas provide potential habitat for special-status plants associated with wetlands on the Santa Rosa Plain. No Special-status plants were observed during protocol-level surveys conducted on the Spring of 2021. Please refer to Appendix A for a copy of the rare plant survey results.

As in my January 22, 2021 letter, I have paraphrased all of the comments in CDFW's letter and provided a response to each comment below.

Mr. Tom Smith
September 15, 2021
Page 2

Comment 1: Page 3 of CDFW Letter

The southern portion of the project appears to support grassland habitat that may be suitable for California tiger salamander (CTS, Ambystoma californiense), a State threatened and federally endangered species. The MND concludes that the “property no longer supports habitat for CTS. It is unclear if the southern 5 acres of the project site have been subject to disturbance from construction and operations allowing grassland habitat to reemerge”.

Response:

Please refer to the California tiger salamander habitat assessment prepared by Ms. Dana Riggs on September 15, 2021 (Riggs, 2021). Based on the findings of this assessment, there is no suitable upland refugia for CTS located on the project site.

Comment 2: Page 3 of Comment Letter

Additionally, the MND describes a Roadway Realignment concluding that it would not impact CTS habitat based on a Biological Resources Evaluation (BRE) prepared for the project however the BRE was not provided.

Response:

I prepared a Biological Resources Evaluation (BRE) of the roadway realignment at Ghilotti Avenue and Standish Avenue on December 10, 2019. This evaluation did not include an evaluation of the proposed project and was for the roadway realignment project only.

Comment 3: Page 3 of Comment Letter

The MND also includes a mitigation measures requiring biological monitoring of the Roadway Realignment if it occurs during the wet season, and states that if any CTS are observed the biologist shall implement applicable protective protocols of CDFW and the United State Fish and Wildlife Service (USFWS). However, it is unclear what the protective protocols would be.

Response:

The referenced mitigation measures were designated for the roadway alignment project not for the proposed project under review.

Comment 4: Page 4 of Comment Letter

The project may result in CTS injury, mortality, and habitat loss. Project impacts would be potentially significant. For an adequate environmental setting and impact analysis and to reduce impacts to less-than-significant, CDFW recommends the following:

- *Provide a thorough analysis of the potential for CTS habitat within the project area and provide a copy of the BRE and any other biological technical studies.*
- *Identify any potentially significant impacts to CTS including potential Mandatory Findings of Significance, prior to mitigation.*
- *Require an Incidental Take Permit from CDFW for impacts to CTS.*
- *Require consultation with USFWS to determine if authorization under the federal ESA is warranted.*

The Terra Bagnata Wetland Mitigation project referenced in the MND does not provide CTS mitigation impacts for this project.

Response:

Please refer to the CTS assessment (Riggs, 2021) for a thorough analysis of potential habitat for CTS on the project site. It was determined that no impact to wetlands nor CTS breeding habitat is anticipated from the proposed project.

As previously stated, the BRE referenced in CDFW's comment letter was not prepared for this project.

Sonoma County will be the entity to consider Mandatory Findings of Significance for the project. Information provided in the CTS assessment is presented to help facilitate that process.

Comment 5: Page 5 of Comment Letter

Would the project have a substantial adverse effect on any riparian habitat or other sensitive community identified in local or regional plans, policies, or by the CDFW or USFWS or on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?

Response:

The proposed project will be limited to the interior portions of the site from the toe of slope of the berms inward as shown on the updated site plan. The ditches that are on the perimeter of the project site are outside of the project area and will not be filled, modified or otherwise altered by the proposed project.

As shown on the attached site plan, the proposed crush operation will take place on the existing ground; there will not be any pavement laid. Water generated during light storm events is anticipated to soak into the ground. To capture stormwater potentially generated from larger precipitation events, the site will be graded to drain to the east where there will be a natural vegetated buffer strip between a k-rail and the ditch that runs parallel to Ghilloti Ave during the winter months.

Comment 6: Page 5 of Comment

Project activities could result in the fill of potential streams and runoff from soil stockpiles could adversely impact stream and wetland habitat and endangered and other special-status plants.

Therefore, CDFW recommends that the MND:

- *Include a thorough analysis of the ditches and wetlands within and adjacent to the site and whether the ditches are potentially subject to Section 1600 of the Fish and Game Code.*
- *Identify potential direct and indirect impacts to the above referenced resources and special-status plants.*
- *Require and LSA Notification to CDFW for impacts to streams and compliance with the LSA Agreement upon issuance.*

Response:

The proposed project does not call for modifying the adjacent channelized drainages surrounding the project site. These ditches, while man-made, may be considered potentially subject to CDFW pursuant to Section 1600 of the Fish and Game Code however they will not be modified as part of the proposed project.

The Study Area is within the Santa Rosa Plain and has the potential to support federally listed plant species that occur on the Santa Rosa Plain including Burke's goldfields (*Lasthenia burkei*), many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Sonoma sunshine (*Blennosperma bakeri*). Surveys were performed on March 18, April 13, and May 11, 2021 within the Study Area in accordance with Guidelines for Conducting and Reporting Botanical

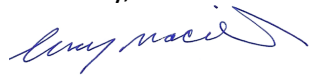
Mr. Tom Smith
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Page 5

Inventories for Federally Listed Plants on the Santa Rosa Plain, California Department of Fish and Wildlife (CDFW) protocol, and California Native Plant Society (CNPS) protocol. No special-status plant species were identified during the surveys. Results of the surveys are provided in Attachment B.

Conclusion

I trust that this letter and associated information satisfactorily respond to CDFW's comments regarding the proposed project. If you have any questions or require further assistance on the project, please contact me at lucymacmillanconsulting@gmail.com or at 415-244-6296. Thank you.

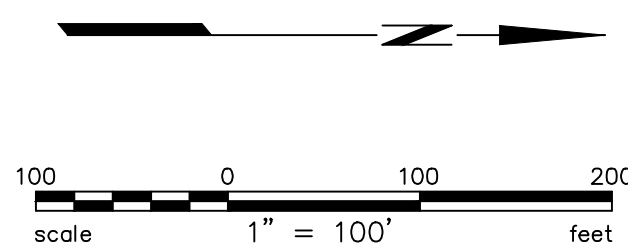
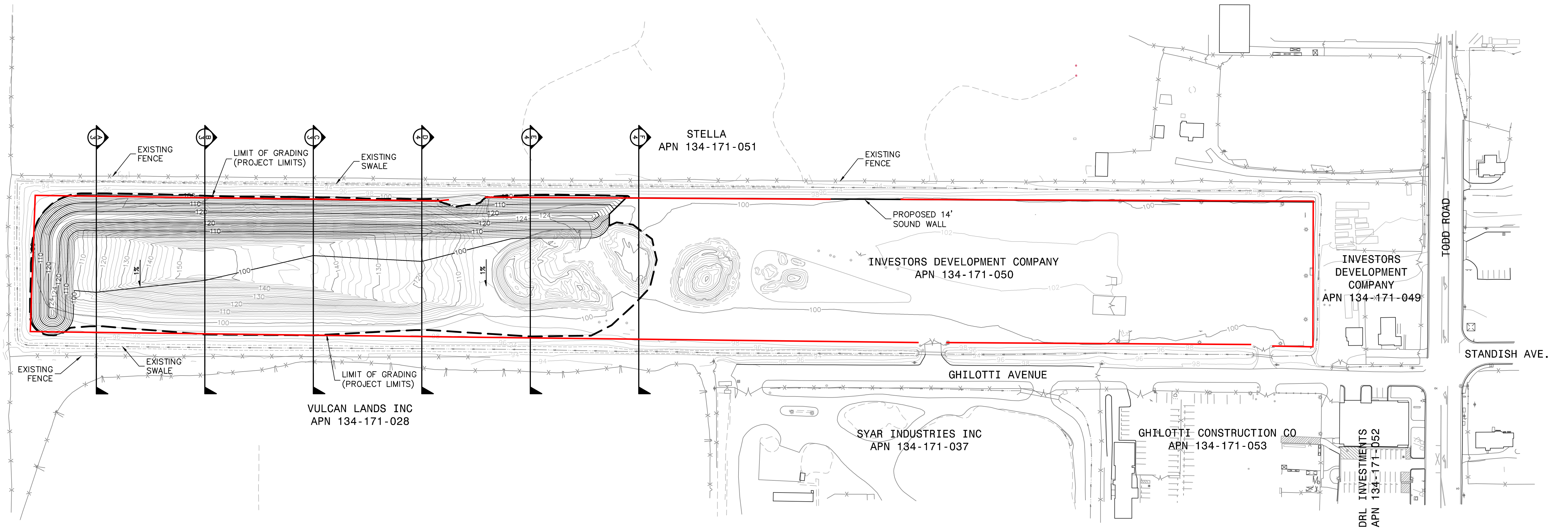
Sincerely,

A handwritten signature in blue ink, appearing to read "Lucy Macmillan", with a stylized flourish at the end.

Lucy Macmillan, M.S.
Environmental Scientist

SITE PLAN

BARELLA
APN 045-013-001



GRADING PLAN

GHILOTTI CONSTRUCTION COMPANY
APN 134-171-050

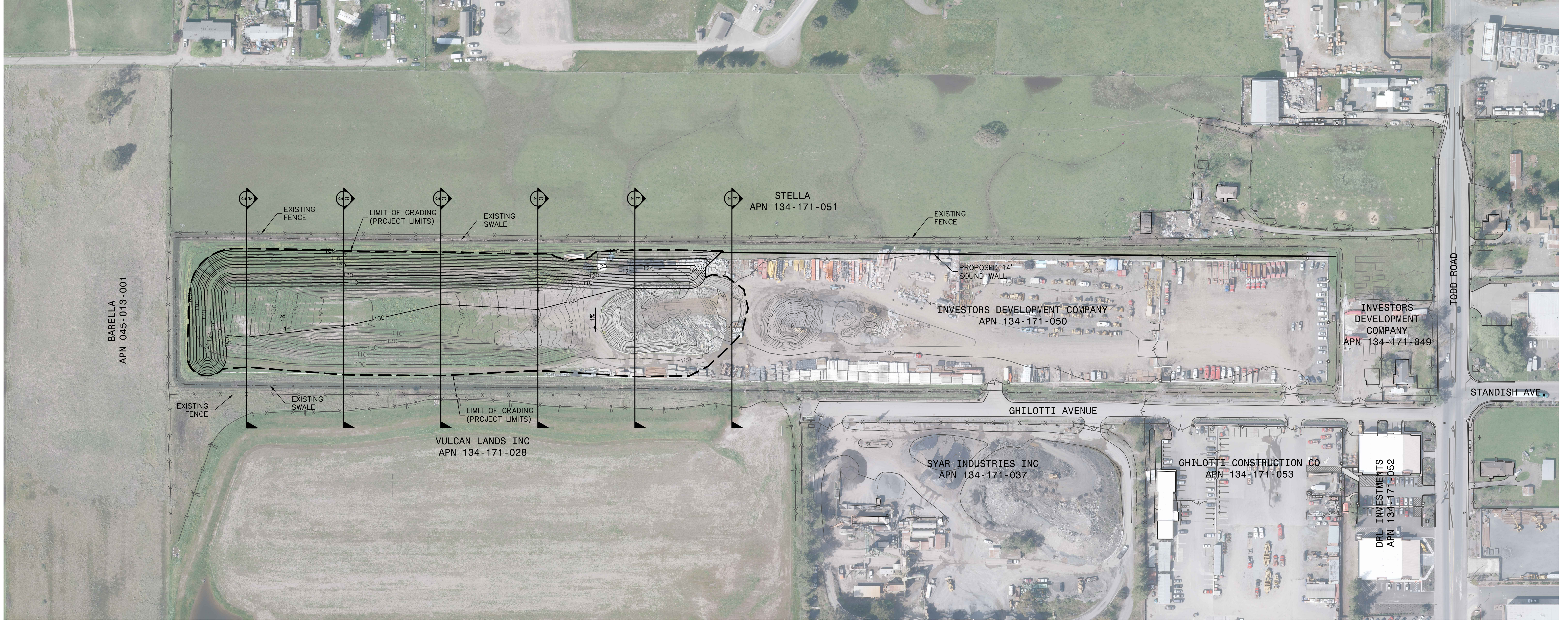
304 TODD ROAD
CITY OF SANTA ROSA, CALIFORNIA

MARCH 18, 2021

PREPARED BY



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SUITE 300
SANTA ROSA, CA 95401
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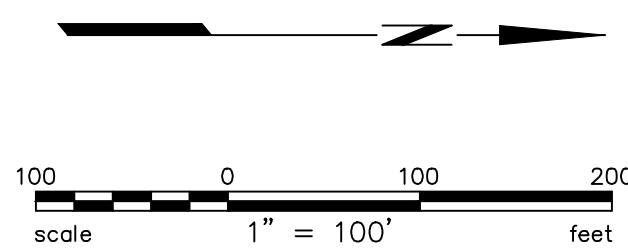
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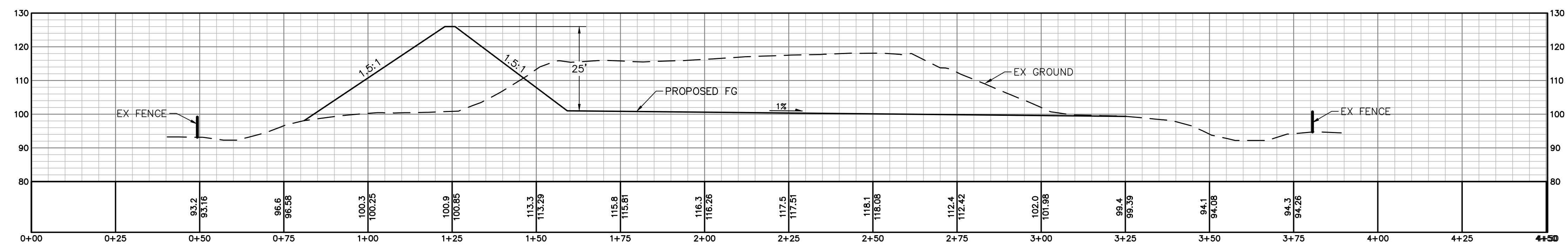
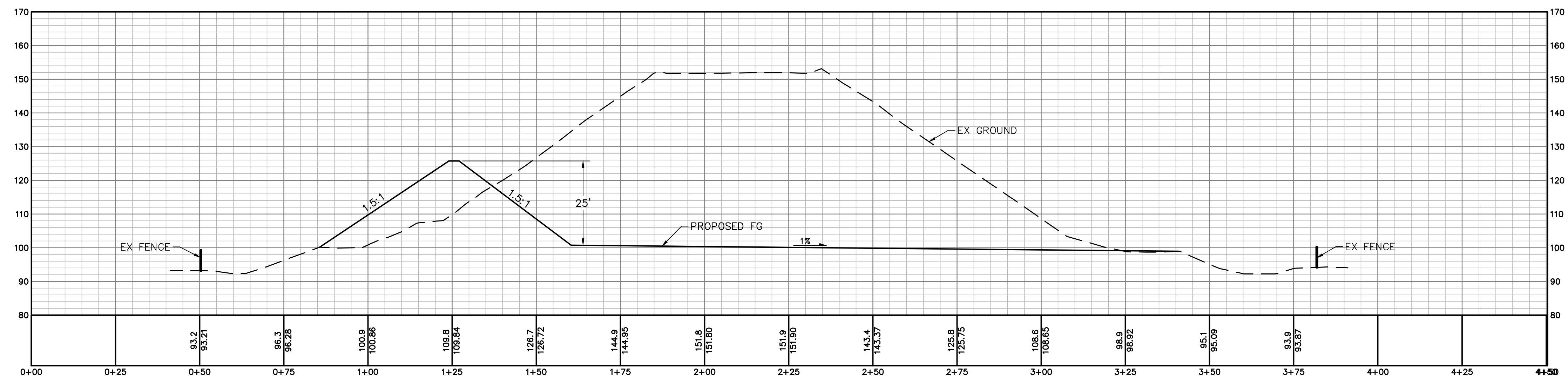
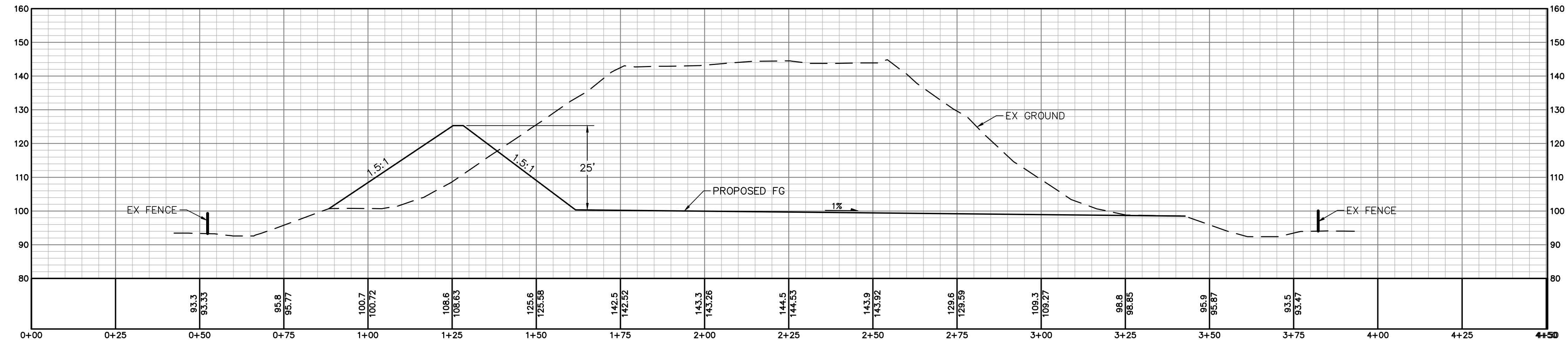


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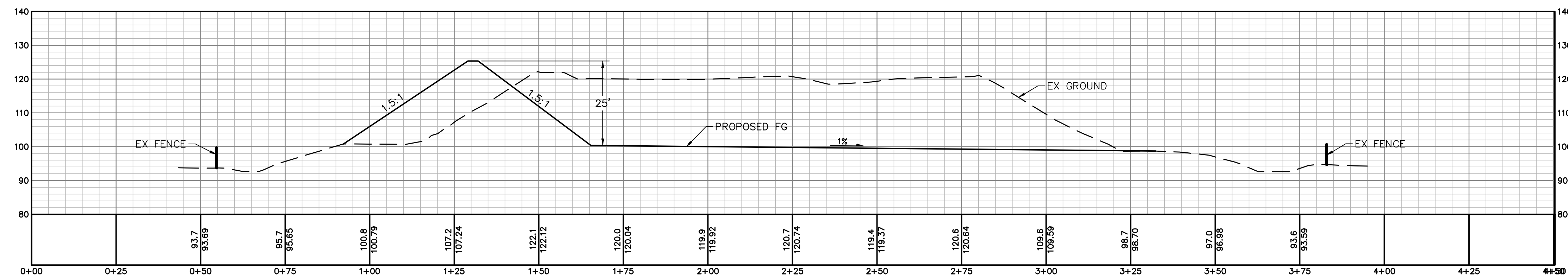
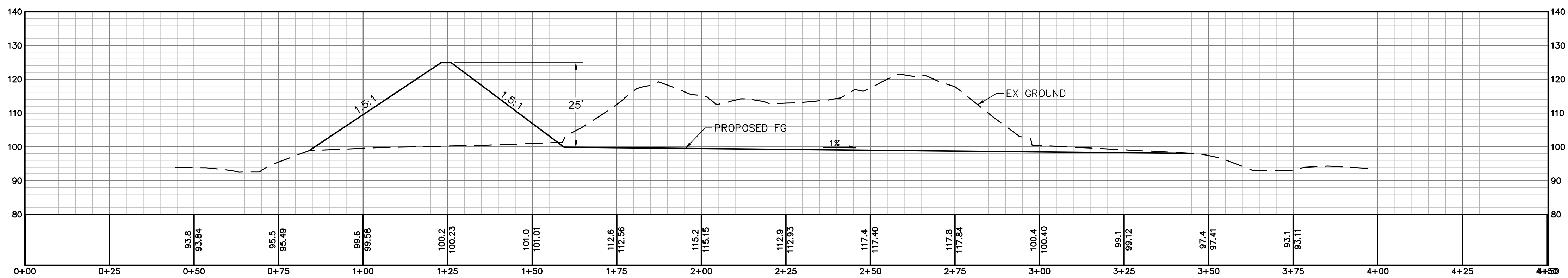
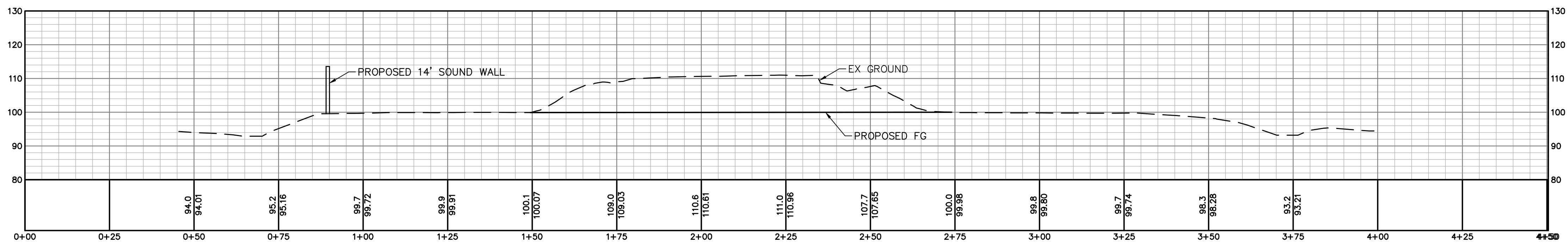
SHEET 2 OF 4 SHEETS





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MARCH 18, 2021



Attachment A - Rare Plant Surveys

July 22, 2021

Mr. Tom Smith
Ghilotti Construction Company, Inc.
246 Ghilotti Avenue
Santa Rosa, CA 95407

Re: Special Status Plant Surveys at 304 Todd Road, Santa Rosa, Sonoma County, California

Dear Mr. Smith,

This letter discusses the findings of protocol-level special status plant surveys at 304 Todd Road in Santa Rosa, Sonoma County, California (Study Area). The purpose of the surveys was to determine the presence or absence of special status plant species and vegetation communities within the Study Area. The Study Area is within the Santa Rosa Plain and has the potential to support federally listed plant species that occur on the Santa Rosa Plain including Burke's goldfields (*Lasthenia burkei*), many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Sonoma sunshine (*Blennosperma bakeri*). Surveys were performed on March 18, April 13, and May 11, 2021 within the Study Area in accordance with Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain,¹ California Department of Fish and Wildlife (CDFW) protocol,² and California Native Plant Society (CNPS) protocol.³ No special status plant species were identified during the surveys.

Project Site Description

The Study Area is located at 304 Todd Road in the City of Santa Rosa, Sonoma County, California (Figure 1). The Study Area is used as an equipment and material storage yard; asphalt, rock, and concrete stockpiling; crushing operations, and recycling and soil stockpiling.

1 Santa Rosa Conservation Strategy. 1996. Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain. Available online at:

https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Appendix_D_%20FWS_Plant_Survey_Protocols.pdf. Accessed: May 2021.

2 CDFW. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available online at:

<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>. Accessed: May 2021.

3 CNPS. 2001. CNPS Botanical Survey Guidelines. Available online at: https://cnps.org/wp-content/uploads/2018/03/cnps_survey_guidelines.pdf. Accessed: May 2021.

Clear Lake clay, sandy substratum, drained, 0 to 2 percent slopes, MLRA 14 is the primary soil map unit within the Study Area.⁴ Clear Lake clay is poorly drained and occurs on basin floors. The parent material is basin alluvium derived from volcanic and sedimentary rock over fan alluvium derived from volcanic and sedimentary rock. Clear Lake clay is rated hydric. Elevation within the Study Area ranges from approximately 32 to 33 meters (105 to 115 feet) above mean sea level, except for a large berm at the south end of the Study Area with an elevation of 38 meters (126 feet).

The project site is developed consisting of gravel parking and equipment storage yards, storage containers and built structures, and pavement rubble piles. The project site has been disturbed since 2004 based on Google Earth aerial images. Vegetation within the developed areas primarily consists of non-native grasses and forbs. Drainage ditches run along the western, southern, and eastern border of a man-made berm. Annual semaphoregrass (*Pleuropogon californicus* var. *californicus*, OBL) and rush (*Juncus* sp.) are predominant within the drainage ditches. These drainage ditches are potential habitat for the target special status plant species.

Methods

Reference Sites

Reference sites were visited prior to each survey. Details regarding each reference site visit can be found in Table 1 below.

Table 1. Reference Site Species Observed Table

Date	Reference Site	Species Observed ¹
March 16, 2021	Alton North Conservation Bank	BLBA, LABU
April 13, 2021	Alton North Conservation Bank	BLBA, LABU, LIVI

¹BLBA – *Blennosperma bakeri*

LABU – *Lasthenia burkei*

LIVI – *Limnanthes vincularis*

Burke's goldfields and Sonoma sunshine were observed in bloom at the Alton North Conservation Bank in March. All three species, including Sebastopol meadowfoam, were observed in bloom at the Alton North Conservation Bank in April. A reference site for many-flowered navarretia was visited in April but no special status plant species were observed.

4 U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS). 2019. Web Soil Survey. Web application. Last updated: July 31, 2019. Available online at: <https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Accessed: May 2021.

Field Surveys

Protocol-level special status plant surveys were performed within the Study Area on March 18, April 13, and May 11, 2021. Surveys were performed by walking throughout the entire Study Area. Surveys were conducted during the appropriate season and were floristic in nature. All plants encountered during the surveys were identified to the highest taxonomic level necessary to determine rarity. The *Jepson Manual* was consulted for detailed biological, distributional, and phenological information, and used as a standard for nomenclature.⁵ All special status plant populations and sensitive communities, if found, were mapped using a handheld Global Positioning System (GPS) unit with sub-meter accuracy.

Field Surveyor Qualifications

Andrew Georgeades, Senior Ecologist for Sol Ecology received his Bachelor of Science degree in Natural Resource Management and Conservation at San Francisco State University in 2005. Prior to co-founding Sol Ecology, Andrew worked as a natural resources' specialist for the Golden Gate National Recreation Area where he was responsible for monitoring native and rare plant populations and planning and supervising revegetation projects within the park. Andrew also previously worked for the California Native Plant Society as a vegetation project lead on the "Manual of California Vegetation, 2nd Ed." Publication. As a lead, he performed plant surveys, identified vegetation habitat types, landforms, environmental conditions, and plant species following the project protocol. Andrew currently is responsible for overseeing all floristic and focused plant surveys at Sol Ecology and maintains a CDFW scientific collecting permit.

Amy May, Associate Biologist for Sol Ecology received a Bachelor of Science degree in Biological Sciences at Virginia Tech in 2006 and a dual Master of Public Affairs and Master of Science in Environmental Science at Indiana University-Bloomington in 2010. She has worked as a biologist in the public and private industry for over 10 years and specializes in special status plant surveys, floristic inventories, and vegetation community mapping with experience in the Bay Area, Mojave Desert, Shasta Cascade Region, Great Basin, and Snake River Plain.

Results

No special status plant species were observed during the 2021 special status plant surveys within the Study Area. Table 2 lists all of the plant species observed within the Study Area during 2021 special status plant surveys.

⁵ Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken, editors. 2012. The Jepson manual: vascular plants of California, second edition. University of California Press, Berkeley.

Discussion

Adverse conditions from yearly weather patterns, as well as disease, drought, fire, herbivory, predation, or other disturbances may preclude the presence of certain plants in a given year. No evidence of disease, fire, herbivory, predation, or other disturbances were observed within the Study Area. Plant species in the developed areas and drainage ditches were evident and easily identifiable.

Weather patterns, including both precipitation and temperature, can influence the likelihood that herbaceous annuals will germinate in a given year. Spring 2021 was a relatively dry season in the Bay Area and the second consecutive year of drought conditions. Based on data from the National Oceanic and Atmospheric Administration (NOAA) California Nevada River Forecast Center (Napa State Hospital), the Study Area vicinity received 39% of the normal precipitation for the water year to date. The water year starts on October 1 and the most current data are based on the months of October 2020 through March 2021.⁶ Although there was not much precipitation in Spring 2021, 3 of the 4 target special status plant species were easily identifiable at the Alton North Conservation Bank throughout a two-month period. Average temperatures were mild enough to trigger germination.⁷

The Study Area is not similar to the Alton North Conservation Bank in terms of plant species composition and landforms present. The reference site is composed of upland grassland and seasonal wetlands that occur almost entirely in swales or shallow headwater depressions. The dominant species within the seasonal wetlands include California oatgrass (*Danthonia californica*), curly dock (*Rumex crispus*), Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), rye grass (*Festuca perennis*), and soft chess (*Bromus hordeaceus*). The reference site is associated with Huichica loam soil series⁸. The Study Area is disturbed. A man-made berm occurs throughout most of the Study Area and drainage ditches occur along the western, southern, and eastern portions of the berm. Annual semaphoregrass and rush are the predominant plant species within the drainage ditches. The Study Area is associated with Clear Lake clay soil series. Although the Study Area is not similar to Alton North Conservation Bank, the elevation, soils, and hydrology observed in the drainage ditches within the Study Area do provide suitable potential habitat for the target special status plant species.⁹

6 National Oceanic and Atmospheric Administration (NOAA). 2021. California Nevada River Forecast Center, Monthly Precipitation Summary Water Year 2021, NSHC1 Napa State Hospital, CA. Last updated: April 21, 2021. Available online at: https://www.cnrfc.noaa.gov/monthly_precip.php. Accessed: April 2021.

7 USDA, NRCS. 2021. Climatic Data, Agricultural Applied Climate Information System (AgACIS), Napa County, Napa County State Hospital, Monthly summarized data, Variable Average Temperature. Available online at: <https://efotg.sc.egov.usda.gov/#/details>. Accessed: May 2021.

8 Ted Winfield and Associates. 2008. Long-term Monitoring and Management Plan for the Alton South Conservation Bank, Sonoma County, CA.

9 USFWS. 2016. Recovery Plan for the Santa Rosa Plain. Available online at: https://ecos.fws.gov/docs/recovery_plan/06012016_Final%20Santa%20Rosa_RP_signed_1.pdf. Accessed: May 2021.

In accordance with the Santa Rosa Conservation Strategy, a second year of plant surveys is recommended to be completed in the Spring of 2022¹⁰. Should you have any questions or concerns, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'AG', with a stylized flourish extending from the bottom.

Andrew Georgeades
Principal Ecologist

Attachment A

Figure 1. Study Area

Table 2. Observed Plant Species Table

10 Santa Rosa Conservation Strategy. 1996. Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain. Available online at:
https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Appendix_D_%20FWS_Plant_Survey_Protocols.pdf. Accessed: May 2021.

Figure 1. Rare Plant Survey Area



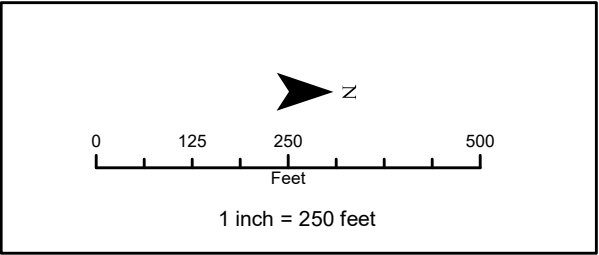
Rare Plant Survey Area
304 Todd Road
Santa Rosa, CA

- Legend**
- Survey Area
 - Roads and Streets



Coordinate System: NAD 1983 UTM Zone 10N
Projection: Universal Transverse Mercator
Datum: North American 1983
Vertical Datum: NAVD88, U.S. Feet

Map created: 7/21/2021
Data: Sol Ecology Inc., Sonoma Co.
Base: ESRI
GIS: AG2060



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Table 2. Observed Plant Species Table

SCIENTIFIC NAME	COMMON NAME	LIFE FORM	ORIGIN	CAL-IPC
ANGIOSPERMS				
Dicots				
Apiaceae – Carrot Family				
<i>Eryngium aristulatum</i>	Jepson's button celery	perennial herb	native	--
Asteraceae – Sunflower Family				
<i>Calendula arvensis</i>	field-marigold	annual herb	non-native	--
<i>Helminthotheca echinoides</i>	bristly ox-tongue	annual or perennial herb	non-native	limited
<i>Hypochaeris radicata</i>	rough cat's-ear	perennial herb	non-native	moderate
<i>Lasthenia glaberrima</i>	smooth goldfields	annual herb	native	--
<i>Senecio vulgaris</i>	common groundsel	annual herb	non-native	--
Campanulaceae – Bellflower Family				
<i>Downingia concolor</i>	spotted throat downingia	annual herb	native	--
Convolvulaceae – Morning-glory Family				
<i>Convolvulus arvensis</i>	Bindweed	perennial herb or vine	non-native	--
Dipsacaceae – Teasel Family				
<i>Dipsacus sp.</i>	Teasel	--	--	--
Fabaceae – Pea Family				
<i>Lathyrus hirsutus</i>	caley pea	annual herb	non-native	--
<i>Lotus corniculatus</i>	bird's-foot trefoil	perennial herb	non-native	--
<i>Lupinus bicolor</i>	miniature lupine	perennial herb	native	--
<i>Medicago polymorpha</i>	California burclover	annual herb	non-native	limited
<i>Trifolium fragiferum</i>	strawberry clover	perennial herb	non-native	--
<i>Vicia sativa</i>	spring vetch	annual herb	non-native	--

SCIENTIFIC NAME	COMMON NAME	LIFE FORM	ORIGIN	CAL-IPC
Geraniaceae – Geranium Family				
<i>Geranium dissectum</i>	Cranesbill	annual herb	non-native	limited
Lamiaceae – Mint Family				
<i>Mentha pulegium</i>	Pennyroyal	perennial herb	non-native	moderate
Lythraceae – Loosestrife Family				
<i>Lythrum hyssopifolia</i>	hyssop loosestrife	annual or perennial herb	non-native	limited
Myrsinaceae – Myrsine Family				
<i>Lysimachia arvensis</i>	scarlet pimpernel	annual herb	non-native	--
Onagraceae – Evening-primrose Family				
<i>Epilobium</i> sp.	Willowherb	--	--	--
Orobanchaceae – Broomrape Family				
<i>Parentucellia viscosa</i>	yellow glandweed	annual herb	non-native	limited
Polygonaceae – Buckwheat Family				
<i>Rumex crispus</i>	curly dock	perennial herb	non-native	limited
Ranunculaceae – Buttercup Family				
<i>Ranunculus muricatus</i>	pricklefruit buttercup	annual or perennial herb	non-native	--
Rosaceae – Rose Family				
<i>Rubus armeniacus</i>	Himalayan blackberrgy	shrub	non-native	high
Monocots				
Alismataceae – Water-Plantain Family				
<i>Alisma</i> sp.	water-plantain	--	--	--
Cyperaceae – Sedge Family				
<i>Carex</i> sp.	Sedge	--	--	--
<i>Cyperus eragrostis</i>	Flatsedge	perennial	native	--
Iridaceae – Iris Family				

SCIENTIFIC NAME	COMMON NAME	LIFE FORM	ORIGIN	CAL-IPC
<i>Sisyrinchium bellum</i>	western blue-eyed-grass	perennial herb	native	--
Juncaceae – Rush Family				
<i>Juncus</i> sp.	Rush	--	--	--
Poaceae – Grass Family				
<i>Avena barbata</i>	slender wild oat	annual grass	non-native	moderate
<i>Briza minor</i>	annual quaking grass	annual grass	non-native	--
<i>Bromus diandrus</i>	ripgut grass	annual grass	non-native	moderate
<i>Bromus hordeaceus</i>	soft chess	annual grass	non-native	limited
<i>Festuca perennis</i>	rye grass	perennial grass	non-native	moderate
<i>Hordeum marinum</i> ssp. <i>gussoneanum</i>	Mediterranean barley	annual grass	non-native	moderate
<i>Hordeum brachyantherum</i>	meadow barley	perennial grass	native	--
<i>Phalaris aquatica</i>	harding grass	perennial grass	non-native	moderate
<i>Pleuropogon californicus</i> var. <i>californicus</i>	annual semaphoregrass	perennial grass	native	--
<i>Poa annua</i>	annual blue grass	annual grass	non-native	--
<i>Polypogon monspeliensis</i>	annual beard grass	annual grass	non-native	limited
Themidaceae – Brodiaea Family				
<i>Brodiaea coronaria</i>	garland brodiaea	perennial herb	native	--
<i>Triteleia peduncularis</i>	long-rayed brodiaea	perennial herb	native	--