



January 28, 2019

Mr. Scott Newton
Arroyo Grande, California
Sent via email: scott@sole2soulsports.com

RE: Biological Resources Assessment Memorandum for the Dove Creek Self-storage Development Project, 11505 El Camino Real and 11450 Viejo Camino, Atascadero, California (APN 045-342-009 and 045-342-010)

Dear Mr. Newton,

Terra Verde Environmental Consulting, LLC (Terra Verde) completed a biological resources assessment of the property located at 11505 El Camino Real and 11450 Viejo Camino (APN 045-342-009 and 045-342-010) in the City of Atascadero, San Luis Obispo County, California (see Attachment A – Figure 1: Site Location and Overview Map). The biological assessment was completed in support of a permit application for a proposed development project which includes the construction of approximately 71,000 square feet of new buildings, including self-storage units and a business operations office building with attached, two-story residential dwelling. An existing, single-family residence located on the western edge of the property will be demolished as part of the proposed project. Current development plans also include re-alignment of an ephemeral drainage that currently flows northeast across the site, in order to convey storm water flows around the proposed development. Approximately 0.77 acre of the total 4.15-acre lot has been designated as a wetland open space preservation area that will be planted with a mix of native species appropriate for the site. This area will receive storm water run-off from the development and any storm water overflow from the re-aligned drainage feature, and will also serve as mitigation for proposed impacts to the existing drainage.

The purpose of the biological resources assessment completed by Terra Verde is to identify sensitive biological resources that occur, or have potential to occur, within the proposed project site. A sensitive resource is defined here as one that is of management concern to local, county, state, and/or federal resource agencies. The existing site conditions, survey methods, and results of the assessment are described in detail below, as well as recommended avoidance and minimization measures, which are intended to reduce potential impacts to sensitive biological resources to the extent feasible. As necessary, this report may be used to support the environmental review and regulatory agency permitting process.



Existing Conditions

The project site is located within the Atascadero U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle, on the eastern edge of the Santa Lucia Mountain Range. It is situated within the Upper Salinas Watershed and the Upper Salinas River Valley, approximately 0.85 mile west of the Salinas River. Topography at the site is flat to gently sloping with elevations ranging from approximately 271 to 280 meters (890 to 920 feet). An unnamed USGS blue line drainage feature flows northeast across the site. The project site is largely undeveloped, with one single-family residence located along the western edge of the project site, which is accessed from Viejo Camino. A review of historical aerial imagery indicates that mowing or other vegetation management activities have been occurring intermittently at this site since at least 2007 (Google Earth, 1989-2017). Further, a herd of goats has been grazed on the property for the past several years.

Methodology

Prior to conducting field surveys of the subject property, Terra Verde staff reviewed the following resources:

- Aerial photographs (Google Earth, 1994-2017) and preliminary site plans
- USGS Atascadero 7.5-minute topographic quadrangle map
- Online Soil Survey of San Luis Obispo County, California, (Natural Resources Conservation Service [NRCS, 2018])
- Consortium of California Herbaria (CCH) online database of plant collections (CCH, 2018)
- California Department of Fish and Wildlife (CDFW) CNDDDB list of state and federally listed special-status species documented within the Atascadero 7.5-minute quadrangle and the surrounding eight quadrangles (Templeton, Creston, Santa Margarita, Lopez Mountain, San Luis Obispo, Morro Bay South, Morro Bay North and York Mountain) (CDFW, 2018)
- CNDDDB map of special-status species that have been documented within a 2-mile radius of the project site (CDFW, 2018) (see Attachment A – Figure 2: 2-mile CNDDDB and Critical Habitat Map)
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants for the Atascadero 7.5-minute quadrangle and the surrounding eight quadrangles (CNPS, 2018)
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) map (USFWS, 2018a)
- USFWS Critical Habitat Portal (USFWS, 2018b)

A list of regionally-occurring, special-status species was compiled based on records reported in the scientific database queries. This species list was utilized to focus the field survey efforts as well as to determine appropriate survey periods for special-status botanical species that have the potential to occur on site. Following the literature review and desktop analysis, Terra Verde completed field surveys of the site, which focused on the identification of sensitive habitats and special-status species, as well as a jurisdictional determination and formal wetland delineation



of hydrologic features. Surveys were completed on May 17 and July 10, 2018, and included the entire approximately four-acre parcel, a 100-foot buffer on all sides where access was feasible, and a visual scan of the surrounding landscape.

During each survey, all detected plant and wildlife species and their sign (e.g., tracks, scat, vocalizations, etc.) were documented (see Attachment B – Wildlife and Botanical Species Observed). Botanical species identifications and taxonomic nomenclature followed *The Jepson Manual: Vascular Plants of California*, 2nd edition (Baldwin et al., 2012), as well as taxonomic updates provided in the Jepson eFlora (Jepson Flora Project, 2018). The second edition of *A Manual of California Vegetation* (MCV; Sawyer et al., 2009) was referenced for vegetation community classification; however, no natural vegetation communities occur on site.

The habitat requirements for each regionally-occurring, special-status species were analyzed and compared to the type and quality of habitats observed on site during the field surveys. The potential for many species to occur within the project site was eliminated due to a lack of suitable habitat, elevation, appropriate soils/substrate, and/or known distribution of the species within the project site. Special-status species for which suitable habitat was identified on site are discussed below.

Results

Hydrologic Resources

As noted previously, an ephemeral, USGS blue line drainage flows northeast across the survey area. This drainage enters the subject property via a culvert located under El Camino Real, conveying storm flows and surface runoff from the adjacent areas. The drainage exits the subject property via a second culvert located under Viejo Camino at the northeastern corner of the property, and converges with Paloma Creek approximately 0.25 mile east of the project site. Paloma Creek flows directly into the Salinas River and eventually to the traditionally navigable waters of the Pacific Ocean. No flowing or standing water was present at the time of the surveys. However, a clearly-defined channel and evidence of an ordinary high water mark (OHWM) were observed within the ephemeral drainage. Based on the results of the jurisdictional determination completed by Terra Verde, it is assumed that this drainage would be considered waters of the state under the jurisdiction of the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB), and waters of the U.S. under the jurisdiction of the U.S. Army Corps of Engineers (Corps).

In addition, a historical wetland feature mapped in the USFWS NWI online database covers approximately 1.80 acres of the proposed project site (USFWS, 2018a). This area is classified as a freshwater emergent wetland, dominated by persistent emergent vegetation, with temporary flooding during the growing season (USFWS, 2018a). As such, a formal wetland delineation was completed to document the current extent of federal and/or state wetlands on the site, the results of which are summarized in a separate report (*Waters and Wetlands Delineation Report*,



Dove Creek Self-Storage Development Project; Terra Verde, 2019). Although the channel bottom supports a dominance of wetland-indicator (i.e., hydrophytic) plant species throughout much of its length, no hydric soils were observed on site. Therefore, no federal wetlands (i.e., three-parameter wetlands defined by presence of hydric soils, wetland hydrology, and dominance of hydrophytic vegetation) were documented within the survey area.

It is important to note that, though generally accurate, the spatial data housed in the NWI is acquired through analysis of high-altitude imagery and therefore, may not accurately reflect current conditions on the ground (USFWS, 2018a). Although historical site conditions may have supported federal wetlands, current conditions do not support a sufficient hydroperiod to create or sustain hydric soils. Thus, the freshwater emergent wetland feature previously mapped within the proposed project site may have transitioned to more xeric conditions as a result of current and past land uses, as well as changes in the local climate and site hydrology.

Vegetation Communities

Vegetation communities and land cover types were assessed and classified based on vegetation composition, structure, and density, with consideration of known land management practices. The survey area consists primarily of ruderal, herbaceous vegetation that is periodically mowed and regularly grazed by goats. A single-family residence, with associated driveway and ornamental landscaping, occupy approximately 0.30 acre of the project site and survey area (see Attachment C – Representative Site Photographs).

A total of 44 vascular plant species were identified within the survey area, of which 33 (75 percent) are non-native and 20 (45 percent) are listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory (Cal-IPC, 2018), with native species observed only at very low cover. The number and abundance of non-native taxa substantially exceeds that of native taxa, and many of the native species documented are known to be disturbance tolerant (e.g., western ragweed [*Ambrosia psilostachya*], common fiddleneck [*Amsinckia intermedia*], common lippia [*Phyla nodiflora*], etc.), reflecting the high level of disturbance and extremely ruderal nature of vegetation on site.

None of the land cover types observed on site correspond to a natural vegetation community as defined in the MCV classification system. The land cover types observed on site are briefly described below, and illustrated in Figure 3 (Vegetation Communities Map) in Attachment A.

Ruderal Herbaceous (3.85 acres)

A vast majority of the site is characterized by ruderal herbaceous vegetation dominated by wall barley (*Hordeum murinum*), Mediterranean barley (*Hordeum marinum* subsp. *gussoneanum*), and heart-podded hoary cress (*Lepidium draba*), with dense patches of yellow star-thistle (*Centaurea solstitialis*). The channel bottom of the ephemeral, blue line drainage supports a distinct assemblage of species dominated by common lippia, with Mediterranean barley present at high cover in occasional patches. The composition of



ruderal herbaceous vegetation observed is typical of grazed, agricultural, and urban sites and may provide limited foraging habitat for birds, small mammals, and other wildlife.

Developed/Ornamental (0.30 acre)

This land cover type is associated with the existing residence and associated driveway. Ornamental trees, including pine (*Pinus* sp.), Mexican fan palm (*Washingtonia robusta*), and coast redwood (*Sequoia sempervirens*) border the home. Anthropogenic/Developed areas observed on site may provide suitable habitat for nesting birds, roosting bats, and limited wildlife foraging and cover.

Special-status Botanical Species

Based on a review of the range and habitat requirements for regionally-occurring special-status species, it was determined that seven special-status botanical species have the potential to occur within the proposed development area. Surveys were timed to occur during the typical blooming and/or fruiting period for these species, which are listed below with special-status rankings:

- Cambria morning-glory (*Calystegia subacaulis* subsp. *episcopalis*), California Rare Plant Rank (CRPR) 4.2
- San Luis Obispo owl's-clover (*Castilleja densiflora* subsp. *obispoensis*), CRPR 1B.2
- Congdon's tarplant (*Centromadia parryi* subsp. *congdonii*), CRPR 1B.1
- Paniculate tarplant (*Deinandra paniculata*), CRPR 4.2
- San Joaquin spearscale (*Extriplex joaquinana*), CRPR 1B.2
- Spreading navarretia (*Navarretia fossalis*), federal threatened / CRPR 1B.1
- Shining navarretia (*Navarretia nigelliformis* subsp. *radians*), CRPR 1B.2

Although low suitability habitat is present for these species on the project site, none were identified during appropriately-timed surveys and, as such, none are expected to occur within the proposed development area.

Special-status Wildlife Species

Based on a review of the range and habitat requirements for regionally-occurring species, it was determined that four special-status wildlife species have the potential to occur within the proposed development area. These wildlife species and their special-status rankings include:

- Grasshopper sparrow (*Ammodramus savannarum*), California Species of Special Concern (CSC)
- Pallid bat (*Antrozous pallidus*), CSC
- Townsend's big-eared bat (*Corynorhinus townsendii*), CSC
- Big free-tailed bat (*Nyctinomops macrotis*), CSC

In addition to these special-status wildlife species, suitable habitat for resident and migratory nesting birds is present on site. Although no nesting birds or roosting bats were detected during



the field surveys, they may utilize the site for nesting purposes on an annual basis and be present prior to the start of construction.

Impact Assessment and Recommended Avoidance and Minimization Measures

The following section includes a summary of potential impacts to sensitive resources as a result of the proposed development. Recommended avoidance and minimization measures (AMMs) are provided, which are intended to reduce or mitigate expected impacts to sensitive biological resources including the existing blue line drainage feature.

Hydrologic Resources

Current development plans include the re-alignment and partial channelization of the blue line drainage through a box culvert, in order to direct and slow storm water flows around the proposed development and reduce flood potential on the site. In addition, sections of the re-aligned channel will be lined with concrete and/or riprap. This will result in the permanent loss of approximately 0.14 acre of ephemeral drainage channel. The proposed wetland open space area included as part of the proposed development will offset the permanent losses. In addition, the following protection measures should be implemented to protect aquatic resources on site during and following construction.

AMM 1: Protection of Hydrologic Resources

Construction within and immediately adjacent to the drainage shall occur only when conditions are dry. For short-term, temporary stabilization, an erosion and sedimentation control plan shall be developed outlining Best Management Practices (BMPs), which shall be implemented to prevent erosion and sedimentation into the channel during construction. Acceptable stabilization methods include the use of weed-free, natural fiber (i.e., non-monofilament) fiber rolls, jute or coir netting, and/or other industry standards. BMPs shall be installed and maintained for the duration of the construction period. In addition, the following general measures shall be implemented during construction:

- The limits of disturbance within the existing drainage feature shall be clearly shown on all sites plans and flagged within the drainages prior to project implementation. All construction personnel shall be directed to avoid impacts to the areas immediately upstream and downstream of the proposed development including the existing culvert features located at El Camino Real and Viejo Camino.
- All equipment and materials shall be stored out of the streambed at the end of each working day, and secondary containment shall be used to prevent leaks and spills of potential contaminants from entering the stream.
- During construction, washing of concrete, paint, or equipment and refueling and maintenance of equipment shall occur only in designated areas a minimum of 50 feet from all drainages and aquatic features. Sandbags and/or sorbent pads shall be available to prevent water and/or spilled fuel from entering drainages.



- Construction equipment shall be inspected by the operator on a daily basis to ensure that equipment is in good working order and no fuel or lubricant leaks are present.

AMM 2: Compensatory Mitigation Plan

A compensatory mitigation plan shall be developed to offset permanent impacts to jurisdictional areas. The exact details and performance criteria of the restoration plan shall be determined during agency coordination with CDFW, RWQCB, and the Corps, as necessary. Stabilization and restoration measures may include the installation of BMPs and/or revegetation using native seed mixes and plantings. Prior to project initiation, all applicable agency permits with jurisdiction over the project area (i.e., Corps, CDFW, and RWQCB) should be obtained. Additional mitigation measures required by these agencies would be implemented as necessary.

Special-status Botanical Species

No special-status botanical species were documented on site during appropriately-timed spring and summer surveys. As such, it is assumed that no special-status botanical species currently exist on site, and no impacts to special-status plant populations will occur as a result of the proposed development.

Special-status Wildlife Species

Demolition of the existing residence and any planned removal of ornamental trees may result in direct or indirect impacts to nesting birds if construction occurs during the typical avian nesting period (generally February 01 through August 31), as well as roosting bats. Further, the grassland habitat areas on site, although disturbed, may provide suitable nesting habitat for ground-nesting species. Impacts may occur due to habitat loss (e.g., removal of trees) or construction-related disturbances that may deter roosting or nesting, or cause nests to fail. Increased short- and long-term anthropogenic activity including increased light pollution may also result in nest failures or deterring nesting and roosting behavior.

AMM 3: Pre-construction Surveys for Roosting Bats

Within 30 days prior to removal of existing structures and/or mature trees, a sunset survey shall be conducted by a qualified biologist to determine if bats are roosting on site. If bats are present, a follow-up acoustic monitoring survey shall be completed to determine, if feasible, which species are present. If roosts of special-status bat species are identified and will be impacted during the proposed project, CDFW will be consulted to determine appropriate measures to be implemented. If it is determined that no special-status bats are present, the project shall proceed under the guidance of a qualified biologist, in a manner that minimizes impacts to individual bats and roosts (e.g., conducting work only during the day or installing one-way exclusions prior to work).

AMM 4: Pre-construction Surveys for Nesting Birds

If work is planned to occur between February 1 and September 15, a qualified biologist shall survey the area for nesting birds within one week prior to activity beginning on site. If



nesting birds are located on or near the proposed project site, they shall be avoided until they have successfully fledged or the nest is no longer deemed active. A non-disturbance buffer of 50 feet will be placed around non-listed, passerine species, and a 250-foot buffer will be implemented for raptor species. All activity will remain outside of that buffer until a qualified biologist has determined that the young have fledged or that proposed construction activities would not cause adverse impacts to the nest, adults, eggs, or young. If special-status avian species are identified, no work will begin until an appropriate buffer is determined in consultation CDFW, and/or the USFWS.

Conclusion

No special-status species were observed during field surveys. Although low suitability habitat is present on site for seven regionally-occurring special-status species, none were observed during appropriately-timed surveys in May and July. As such, none are expected to occur. In addition, it was determined that four special-status wildlife species, as well as nesting birds, may utilize existing structures and trees/grassland at the site. Further, proposed impacts to an ephemeral blue line drainage will result in the permanent loss of jurisdictional areas and associated habitat. An approximately 0.77-acre wetland and open space preservation area has been incorporated into the site development plans, which will offset these permanent losses.

Based on the current proposed preliminary designs, it is expected that implementation of the recommended mitigation measures will avoid and/or minimize impacts to potentially occurring sensitive biological resources to a less than significant level. If you should have any questions or require additional information, please contact me at knelson@terraverdeweb.com or (702) 596-5038.

Sincerely,

A handwritten signature in black ink that reads "Kristen Nelson".

Kristen Nelson
Botanist

Attachments:

A – Figures

Figure 1: Site Location and Overview Map

Figure 2: 2-mile CNDDDB and Critical Habitat Map

Figure 3: Vegetation Communities Map

B – Wildlife and Botanical Species Observed

C – Representative Site Photographs



References

- Baldwin, Bruce G., D.H. Goldman, D.J. Keil, R. Patterson, T.J. Rosatti, and D.H. Wilken. *The Jepson Manual: Vascular Plants of California*, Second Edition. University of California Press. Berkeley, California. 2012.
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ATTACHMENT A – Figures

Figure 1: Site Location and Overview Map

Figure 2: 2-mile CNDDB and Critical Habitat Map

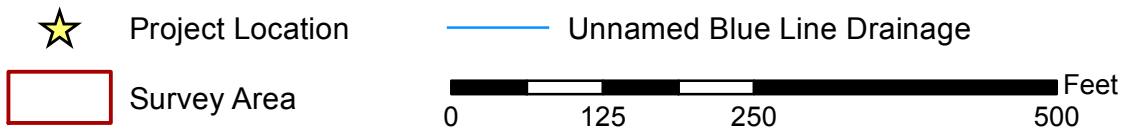
Figure 3: Vegetation Communities Map



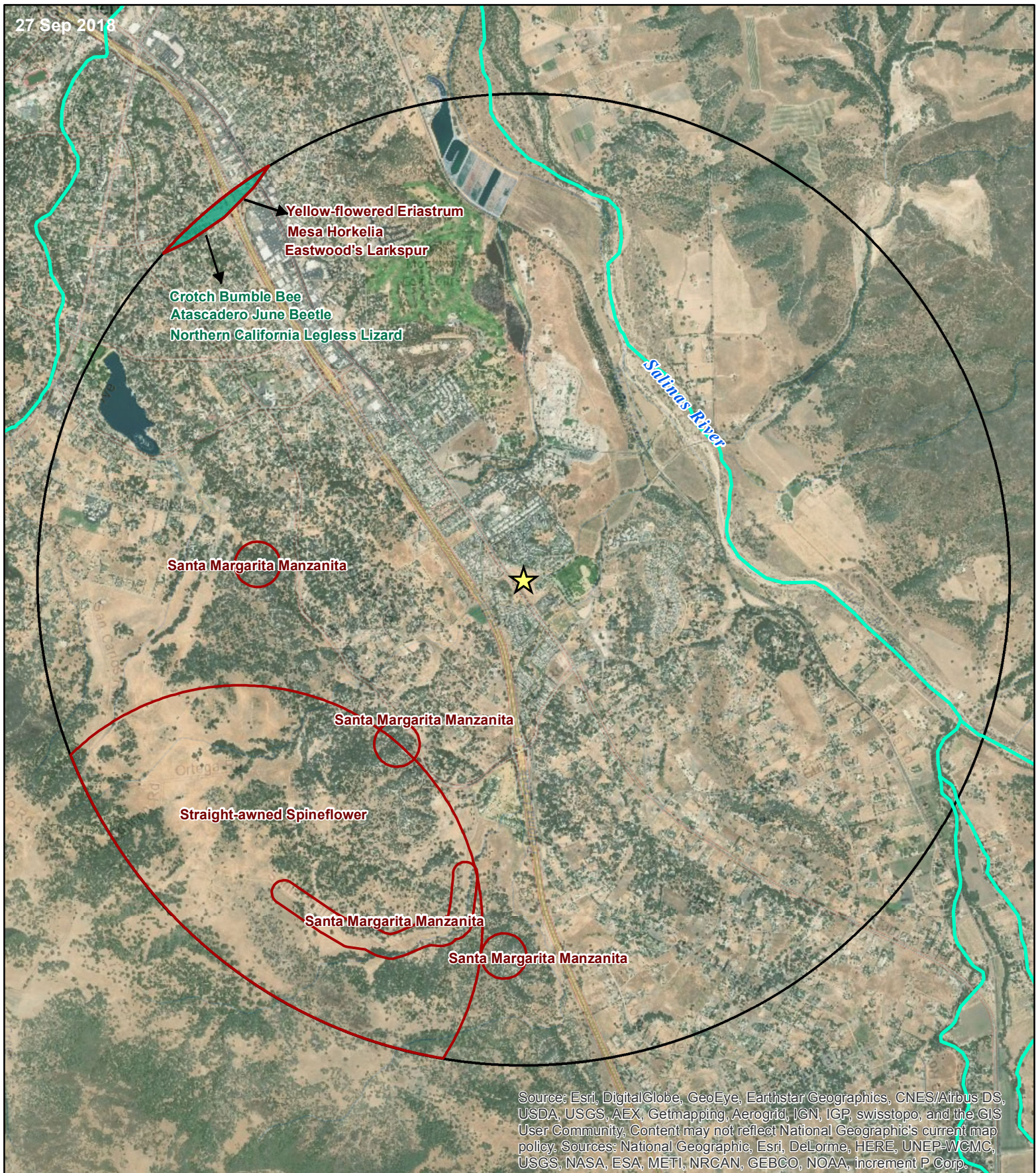
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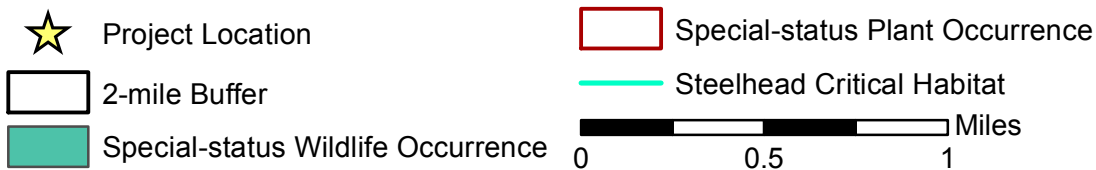
Dove Creek Self-storage Development Project
Figure 1: Site Location and Overview Map



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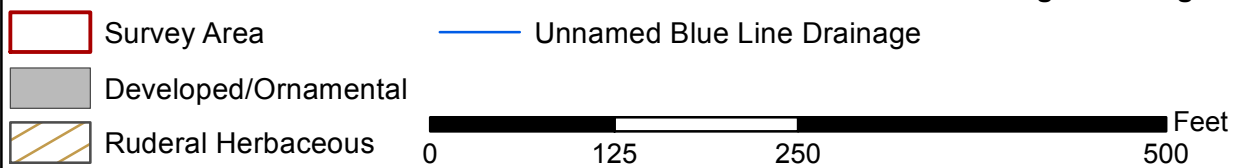
Dove Creek Self-storage Development Project
Figure 2: 2-mile CNDDB and Critical Habitat Map



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Dove Creek Self-storage Development Project
Figure 3: Vegetation Communities Map





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ATTACHMENT B – Wildlife and Botanical Species Observed

Table A.2. List of Wildlife Species

Order	Scientific Name	Common Name	Origin/Listing Status*
Avifauna	<i>Cathartes aura</i>	Turkey vulture	--
	<i>Corvus brachyrhynchos</i>	American crow	--
	<i>Haemorhous mexicanus</i>	House finch	--
	<i>Melospiza crissalis</i>	California towhee	--
	<i>Passer domesticus</i>	House sparrow	Non-native
	<i>Sayornis saya</i>	Say's phoebe	--
	<i>Spinus psaltria</i>	Lesser goldfinch	--
Mammals	<i>Thomomys bottae</i>	Botta's pocket gopher	--
Reptiles	<i>Sceloporus occidentalis</i>	Coast range fence lizard	--

Table A.1. List of Botanical Species

Family	Scientific Name	Common Name	Indicator Status ¹	Origin
Apiaceae, Carrot Family	<i>Conium maculatum</i>	Poison hemlock	FACW	Naturalized
Arecaceae, Palm Family	<i>Washingtonia robusta</i>	Mexican fan palm	FACW	Naturalized (Ornamental)
Asteraceae, Sunflower Family	<i>Ambrosia psilostachya</i>	Western ragweed	--	Native
	<i>Anthemis cotula</i>	Mayweed	--	Naturalized
	<i>Capsella bursa-pastoris</i>	Shepherd's purse	--	Naturalized
	<i>Carduus pycnocephalus</i> subsp. <i>pycnocephalus</i>	Italian thistle	--	Naturalized
	<i>Centaurea solstitialis</i>	Yellow star-thistle	--	Naturalized
	<i>Erigeron bonariensis</i>	Flax-leaved horseweed	--	Naturalized
	<i>Silybum marianum</i>	Milk thistle	--	Naturalized
	<i>Sonchus asper</i> subsp. <i>asper</i>	Prickly sow thistle	FAC	Naturalized
Boraginaceae, Borage Family	<i>Amsinckia intermedia</i>	Common fiddleneck	--	Native
	<i>Amsinckia menziesii</i>	Small-flowered fiddleneck	--	Native
	<i>Plagiobothrys canescens</i>	Valley popcornflower	--	Native
Brassicaceae,	<i>Brassica nigra</i>	Black mustard	--	Naturalized

Table A.1. List of Botanical Species

Family	Scientific Name	Common Name	Indicator Status ¹	Origin
Mustard Family	<i>Capsella bursa-pastoris</i>	Shepherd's purse	--	Naturalized
	<i>Hirschfeldia incana</i>	Mediterranean hoary mustard	--	Naturalized
	<i>Lepidium draba</i>	Heart-podded hoary cress	--	Naturalized
Convolvulaceae, Morning-glory Family	<i>Convolvulus arvensis</i>	Bindweed	--	Naturalized
Cupressaceae, Cypress Family	<i>Sequoia sempervirens</i>	Coast redwood	--	Native (Ornamental)
Fabaceae, Legume Family	<i>Acmispon americanus</i> var. <i>americanus</i>	American bird's foot trefoil	--	Native
	<i>Lotus corniculatus</i>	Bird's-foot trefoil	FAC	Naturalized
	<i>Medicago polymorpha</i>	California burclover	--	Naturalized
	<i>Vicia villosa</i>	Hairy vetch	--	Naturalized
Geraniaceae, Geranium Family	<i>Erodium botrys</i>	Big heron bill	--	Naturalized
	<i>Erodium cicutarium</i>	Redstem filaree	--	Naturalized
	<i>Erodium moschatum</i>	Greenstem filaree	--	Naturalized
	<i>Geranium molle</i>	Crane's bill geranium	--	Naturalized
Juncaceae, Rush Family	<i>Juncus</i> cf <i>patens</i>	Spreading rush	FACW	Native
Lamiaceae, Mint Family	<i>Marrubium vulgare</i>	White horehound	--	Naturalized
Myrsinaceae, Myrsine Family	<i>Lysimachia arvensis</i>	Scarlet pimpernel	FAC	Naturalized
Papaveraceae, Poppy Family	<i>Eschscholzia californica</i>	California poppy	--	Native
Poaceae, Grass Family	<i>Avena barbata</i>	Slender wild oat	--	Naturalized
	<i>Bromus catharticus</i>	Rescue Grass	--	Naturalized
	<i>Bromus diandrus</i>	Ripgut grass	--	Naturalized
	<i>Bromus hordeaceus</i>	Soft chess	--	Naturalized
	<i>Bromus madritensis</i> subsp. <i>rubens</i>	Red brome	--	Naturalized
	<i>Cynodon dactylon</i>	Bermuda grass	--	Naturalized
	<i>Elymus triticoides</i>	Beardless wild rye	FAC	Native

Table A.1. List of Botanical Species

Family	Scientific Name	Common Name	Indicator Status ¹	Origin
	<i>Festuca perennis</i>	Rye grass	FAC	Naturalized
	<i>Hordeum marinum</i> subsp. <i>gussoneanum</i>	Mediterranean barley	FAC	Naturalized
	<i>Hordeum murinum</i>	Wall barley	--	Naturalized
	<i>Pennisetum clandestinum</i>	Kikuyu grass	--	Naturalized
Polygonaceae, Buckwheat Family	<i>Rumex crispus</i>	Curly dock	FAC	Naturalized
Rubiaceae, Madder Family	<i>Galium aparine</i>	Goose grass	--	Native
Rubiaceae, Madder Family	<i>Galium aparine</i>	Goose grass	--	Native
Salicaceae, Willow Family	<i>Salix laevigata</i>	Red willow	FACW	Native
Verbenaceae, Vervain Family	<i>Phyla nodiflora</i>	Common lippia	FACW	Native

¹**Listing Status:** Indicates listing status for taxa that are included on the National Wetland Plant List (NWPL) for the Arid West region (USFWS, 2016), as well as taxa that are considered noxious/invasive weeds in California. No special-status species were documented. Taxa that are considered wetland-indicators are included on the NWPL and assigned one of the following wetland indicator statuses:

- **Obligate (OBL):** plants that almost always occur in wetlands.
- **Facultative Wetland (FACW):** plants that usually occur in wetlands, but may occur in non-wetlands.
- **Facultative (FAC):** plants that are equally likely to occur in wetlands and non-wetlands.

²**cf (=conforms to):** indicates provisional species determination based on the observed pheno-phase, but in the absence of diagnostic features (e.g., desiccated or undeveloped reproductive structures).



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ATTACHMENT C - Representative Site Photographs



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Photo 1. View west showing the narrow channel of the blue line drainage (May 17, 2018).



Photo 2. View north toward private residence and landscape trees present on western site boundary (May 10, 2017).



Photo 3. View west of the culvert under Viejo Camino, with a debris rack just downstream of the culvert outlet (May 17, 2018).



Photo 4. View east of the downstream end of the drainage where it flows under Viejo Camino (May 17, 2018).