



November 6, 2023
Revised January 30, 2026

Attn: Warren Donald
1180 Shadowbrook Lane
El Dorado Hills, CA 95762

Subject: Biological Resource Evaluation Conditions Update at 2806 Alameda Avenue, Half Moon Bay, California

Dear Warren Donald,

The purpose of this letter is to provide an update on existing conditions and avoidance and minimization measures documented in a previous biological report for the proposed project at 2806 Alameda Avenue (Project, APN: 048-111-090). The focus of this letter is a 0.16-acre area (Project Area) and an approximately 200-foot buffer amounting to a 4.75-acre area (Study Area) in the City of Half Moon Bay, San Mateo County, California. The Project involves developing a single-family residence with an associated access drive and accessory dwelling unit attached to the residence over 0.07 acre of the Project Area. In addition to describing current existing conditions, this letter report identifies and describes any potential existing sensitive habitats including riparian and wetland areas or other Environmentally Sensitive Habitat Areas (ESHA), and “rare, threatened, or endangered” species not identified in previous reports for the Study Area.

WRA performed the biological evaluation on September 19, 2023, in accordance with the 2020 City of Half Moon Bay (City) Local Coastal Land Use Plan (LCLUP)¹. The Study Area was included in the evaluation. This assessment is based on conditions observed on the date of the site visit, related information available at the time of the study, and a review of previous reports completed for this property. Previous reports include the Draft Biological Resources Evaluation (WRA 2018; 2018 Draft BRE)² which encompassed the Study Area and to which this letter provides updates. Any changes in biological communities or species since the 2018 report are described and discussed. This letter contains an updated evaluation of potential impacts to special-status species or ESHAs that may occur as a result of development of the Project Area.

Description of the Project and Study Area

The approximately 4.75-acre Study Area is located west of U.S. Highway 1 in the City of Half Moon Bay and is comprised of relatively flat slopes dominated by active agricultural fields, coyote brush scrub, ruderal areas, and developed land. Monterey cypress (*Hesperocyparis macrocarpa*) stands are present in southern portions of the Study Area. Pullman Watercourse flows through the

¹ City of Half Moon Bay (City). 2020. City of Half Moon Bay Local Coastal Land Use Plan. October 20.

² WRA, Inc. (WRA). 2018. Draft Biological Resource Evaluation 2806 Alameda Avenue. Prepared for City of Half Moon Bay.



center of the Study Area in a southwesterly direction. Agricultural fields are present in the southern Study Area and development dominates the northern Study Area.

The approximately 0.16-acre Project Area is currently undeveloped and vegetated adjacent to Pullman Watercourse. The dominant vegetation is comprised of common ruderal, primarily non-native species such as fennel (*Foeniculum vulgare*), wild radish (*Raphanus sativus*), Italian ryegrass (*Festuca perennis*), upright veldtgrass (*Ehrharta erecta*), and bristly oxtongue (*Helminthotheca echioides*). Two small stands of arroyo willow (*Salix lasiolepis*) are also present. The footprint of the residence is approximately 30 feet from the Pullman Watercourse top of bank (TOB).

Regulatory Setting

SENSITIVE BIOLOGICAL COMMUNITIES

Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, and riparian habitat. These habitats are regulated under federal regulations (such as the Clean Water Act), state regulations (such as the Porter-Cologne Act, the California Department of Fish and Wildlife (CDFW) Streambed Alteration Program, and California Environmental Quality Act (CEQA)), or local ordinances or policies (such as City or County Tree Ordinances, Special Habitat Management Areas, LCLUP, and General Plan Elements). Mitigation measures for impacts to these communities are discussed in the Recommendations section of this report.

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by CDFW under Sections 1600-1616 of the California Fish and Game Code (CFG). Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term stream, which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as follows: “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation” (14 CCR 1.72). In addition, the term stream can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream dependent terrestrial wildlife (CDFG 1994). Riparian is defined as, “on, or pertaining to, the banks of a stream;” therefore, riparian vegetation is defined as, “vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself” (CDFG 1994)³. Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

SPECIAL-STATUS SPECIES

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the federal Endangered Species Act (FESA) and/or California Endangered Species Act (CESA). These Acts afford protection to both listed species, and in the case of CESA, candidate species. In addition, the following are considered special-status species: the CDFW Species of Special Concern, the National Marine Fisheries Service (NMFS) Species of Concern, U.S. Fish and Wildlife Service (USFWS) Birds of Conservation Concern, and species identified in the LCLUP. In addition to

³ California Department of Fish and Game (CDFG). 1994. A Field Guide to Lake and Streambed Alteration Agreements, Sections 1600-1607, California Fish and Game Code. Environmental Services Division, Sacramento, CA.

regulations for special-status species, nests of most birds in the United States, including non-status species, are protected by the Migratory Bird Treaty Act of 1918 (MBTA) and California Fish and Game Code (CFGC). Bat species designated as “High Priority” by the Western Bat Working Group (WBWG) qualify for legal protection under Section 15380(d) of the CEQA Guidelines. Plant species on the California Native Plant Society (CNPS) Rare Plant Inventory with California Rare Plant Ranks (Rank) of 1 and 2, as well as some with a Rank of 3 or 4, are also considered special-status plant species and must be considered under CEQA. Some Rank 3 and Rank 4 species are typically only afforded protection under CEQA when such species are particularly unique to the locale (e.g., range limit, low abundance/low frequency, limited habitat) or are otherwise considered locally rare.

THE CALIFORNIA COASTAL ACT

The California Coastal Commission (CCC), in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone under the California Coastal Act (CCA). The coastal zone varies in width from several hundred feet in highly urbanized areas up to five miles in undeveloped areas; and, offshore, the coastal zone includes a three-mile-wide band of ocean. Development activities, which are broadly defined by the CCA to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a CDP from the CCC. The CCA includes goals and policies that constitute the statutory standards applied to planning and regulatory decisions made by the CCC and by local governments.

THE CALIFORNIA COASTAL COMMISSION ENVIRONMENTALLY SENSITIVE HABITAT AREA (ESHA) DEFINITION

The CCC defines an ESHA as follows:

“Environmentally sensitive habitat area” means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments.”

The CCC Guidelines contain definitions for specific types of ESHAs, including wetlands, estuaries, streams and rivers, lakes, open coastal waters and coastal waters, riparian habitats, other resource areas, and special-status species and their habitats. For the purposes of this report, WRA has taken into consideration any areas that may meet the definition of any ESHA defined by the CCC guidelines or the City LCLUP.

CITY OF HALF MOON BAY LCLUP AND COASTAL RESOURCE CONSERVATION STANDARDS

The Local Coastal Plan and Land Use Plan for the City were updated in 2020 (LCLUP) after the 2018 Draft BRE. The primary goal of the LCLUP is to ensure that the local government’s land use plans, zoning ordinances, zoning maps, and implemented actions meet the requirements of the provisions and policies of the Coastal Act at the local level. Coastal Resource Conservation Standards are described in Chapter 6 of the LCLUP and define sensitive habitat and coastal resource areas for conservation to include: sand dunes; marine habitats; sea cliffs; riparian areas; wetland, coastal tidelands and marshes, lakes, ponds, and adjacent shore habitats; coastal or off-shore migratory bird nesting sites; areas used for scientific study, refuges, and reserves; habitats containing unique or rare and endangered species; rocky intertidal zones; some coastal scrub communities; and archaeological resources. Marine and water resources (including riparian habitats) are also defined in Chapter 6.



Half Moon Bay Heritage Trees

The City stipulates that any tree classified as heritage shall require a tree protection plan in any instance where grading, excavation, demolition, or construction activity occurs within the drip line. Additionally, the removal or major pruning of a heritage tree requires a permit and a fee as established by the city manager and council. The City classifies a “heritage” tree as any tree located on public or private property (excluding eucalyptus) with a trunk diameter of twelve inches or more, or a circumference of at least thirty-eight inches measure at 48 inches above ground level (City 2021).

Methods

Special-status Species Literature Searches

A literature and database search of special-status species with documented occurrences in the vicinity of the Study Area resulted in a list of locally present special-status species. Database searches for known occurrences of special-status species included the Half Moon Bay 7.5-minute U.S. Geological Survey quadrangle and the seven surrounding USGS quadrangles. The following sources were reviewed to determine which special-status plant and wildlife species have been documented to occur in the vicinity of the Study Area:

- Draft Biological Resource Evaluation 2806 Alameda Avenue (WRA 2018)²
- California Natural Diversity Database (CNDDDB) records (CDFW 2023)⁴
- CNPS Rare Plant Inventory (CNPS 2023)⁵
- Information for Planning and Conservation Trust Resource Report (USFWS 2023)⁶
- CDFW publication “California’s Wildlife, Volumes I-III” (Zeiner et al. 1990)⁷
- CDFW publication “California Amphibian and Reptile Species of Special Concern” (Thomson et al. 2016)⁸
- California Bird Species of Special Concern (Shuford and Gardali 2008)⁹
- Western Bat Working Group, species accounts (WBWG 2023)¹⁰
- City of Half Moon Bay Certified LCLUP (City 2020)¹

A site visit was conducted to search for suitable habitats within the Study Area for those species identified as occurring within the vicinity.

⁴ California Department of Fish and Wildlife (CDFW). 2023. Natural Diversity Database, Wildlife and Habitat Data Analysis Branch. Sacramento.

⁵ California Native Plant Society (CNPS). 2023. Electronic Inventory of Rare and Endangered Vascular Plants of California. California Native Plant Society, Sacramento, California.

⁶ U.S. Fish and Wildlife Service (USFWS). 2023. IPaC - Information for Planning and Conservation Trust Resource Report. Sacramento Fish and Wildlife Office. Available online: <http://ecos.fws.gov/ipac/>. Most recently accessed September 2023.

⁷ Zeiner, D. C., W. F. Laudenslayer, Jr., K. E. Mayer, and M. White. 1990. California's Wildlife, Volume I-III: Amphibians and Reptiles, Birds, Mammals. California Statewide Wildlife Habitat Relationships System, California Department of Fish and Game, Sacramento.

⁸ Thompson, R. C., Wright, A. N., and Shaffer, B. H. 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife and University of California Press, Oakland, California.

⁹ Shuford, W.D. and Gardali, T., Eds. 2008. California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

¹⁰ Western Bat Working Group (WBWG). 2023. Species accounts. Prepared by: Betsy C. Bolster. Available online at: <http://wbwg.org/western-bat-species/>. Most recently accessed September 2023.



Site Visit

On September 19, 2023, WRA biologists traversed the Study Area on foot to determine (1) the presence of sensitive coastal resources or habitat areas (ESHAs); (2) presence of potentially jurisdictional features such as wetlands, waters, and riparian communities; and (3) if existing conditions in the Study Area have changed since the most recent assessment in 2018, with respect to habitat provided for any rare, endangered, or unique plant or wildlife species (special-status species) or other ESHAS.

The site visit is intended to identify suitable habitat for special-status species known to occur in the vicinity to determine their potential to occur within the Study Area. The site visit does not constitute a protocol-level survey and is not intended to determine the actual presence or absence of a species; however, if a special-status species is observed during the site visit, its presence will be recorded and discussed.

Results

WRA concurs with nearly all the findings in the 2018 Draft BRE for biological communities and finds that they are mostly consistent with current conditions. However, one update is provided and discussed below based on observations from the site visit. The 2018 Draft BRE report described a riparian biological community within the Study Area which has since changed. In 2019, 2020, and 2022, the California Department of Forestry and Fire Protection (CalFire) conducted weed abatement activities within the Project Area. Additionally, in 2022, a dead arroyo willow that was believed to have been impacted by root rot was removed from the Project Area (Maguire Tree Care Inc. 2022)¹¹. Two more arroyo willow trees were recommended for removal on-site because they had fallen over and uprooted, and they were subsequently removed (Maguire Tree Care Inc, 2023)¹².

With the exception of the change to the riparian biological community, no biological communities, special-status plants, or habitat for rare, endangered or unique wildlife species which were not previously identified in the 2018 Draft BRE were identified during database searches or the September 19, 2023, site visit.

The following sections present the results and discussion of existing conditions within the Study Area. A BRE and a delineation update were conducted concurrently during the September 19, 2023, site visit. Updated maps of biological communities present within the Study Area are provided as Attachment A. A list of observed plant species is included as Attachment B. Photographs of the Study Area are included as Attachment C and wetland delineation data sheets are included as Attachment D.

Biological Communities

Non-sensitive biological communities in the Study Area include the following: agriculture, coyote brush scrub, developed, Monterey cypress, arroyo willow thicket non-riparian, and ruderal. Two sensitive biological communities that are considered ESHAs are found in the Study Area: intermittent stream and arroyo willow thicket riparian (Attachment A, Figures 1-2). The LCLUP maps the Project Area parcel and part of a neighboring parcel immediately north as central coast

¹¹ Maguire Tree Care, Inc. 2022. Letter to Warren Donald. May 2.

¹² Maguire Tree Care, Inc. 2023. Evaluation and Request for Removal Permits for Creek Willows (*Salix laevigata*). May 26.



riparian scrub (Figure 6-1 in the LCLUP); however, the map of potential ESHAs was limited to the Pullman Watercourse and did not include areas mapped as central coast riparian scrub (Figure 6-4 in the LCLUP). Based on the September 19, 2023 site visit, riparian habitat was limited to a portion of the Pullman Watercourse which was mapped as arroyo willow thicket riparian. Ruderal vegetation dominated the remainder of the parcel and did not extend into the neighboring parcel which was determined to be landscaped portion of the yard and mapped as developed.

The Study Area contains 0.03 acre (267 LF) of intermittent stream (known as the Pullman Watercourse) and 0.02 acre of riparian habitat (arroyo willow thicket riparian). Riparian habitat occurs within the Project Area but outside of the proposed development footprint. The intermittent stream is adjacent to but outside of the Project Area. Most of these communities were described in the 2018 Draft BRE. Vegetation within Pullman Watercourse is unchanged and is predominantly ruderal outside of the willows overhanging the northern portion of the Study Area. Plant species within the Pullman Watercourse include poison hemlock (*Conium maculatum*), bristly oxtongue, tall flatsedge (*Cyperus eragrostis*), and stinging nettle (*Urtica dioica*). An update to the riparian and willow communities described in the 2018 Draft BRE is provided.

Update to Riparian and Willow Communities

A single, contiguous patch of arroyo willow was observed in the Project Area in 2018, and it was determined to be riparian. However, during the September 2023 site visit, there were two small, disjunct patches of arroyo willow, separated by approximately 17 feet with no willow sprouts or regrowth from previously removed trees detected in this gap. Both patches of arroyo willow are rooted above the TOB of the Pullman Watercourse, and there is no indication that they are dependent on it as a primary hydrological source. Instead, they likely rely heavily on coastal fog drip and reduced evapotranspiration resulting for the mild temperatures and marine layer during the dry season. Although arroyo willows often occur in wetlands and can function as a hydrophyte, the species can have deep taproots and access subsurface water that is below the depth required for wetland delineation purposes. In such situations, arroyo willows function as non-hydrophytes.

The northwestern patch of arroyo willows is located approximately 30 feet from the Pullman Watercourse and does not perform riparian functions (e.g., shading of the stream, contribution of allochthonous material) and was therefore not considered to be a riparian community. For the purposes of this report, it was mapped as the arroyo willow thicket non-riparian biological community. The southeastern patch of arroyo willows partially overhangs the Pullman Watercourse and was considered to be riparian habitat because it provided shade and allochthonous material to the watercourse. For the purposes of this report, it was mapped as the arroyo willow thicket riparian biological community.

These findings are an update to the 2018 Draft BRE. Site conditions have changed since 2018, and there is a reduction of riparian habitat by 0.08 acre. This may be a result of natural processes including droughts and storm events based on arborist reports (Maguire 2022 and 2023). Willows will resprout from stumps or branches if the tree is still alive, and new sprouts were observed in the understory of the patch identified as riparian. The lack of willow regrowth and sprouts observed between the two willow patches during the 2023 site visit indicates that conditions may have changed sufficiently to reduce willow growth and riparian habitat within the Project Area. Vegetation management by CalFire is not believed to be at a level that would prevent willow regrowth if willows were still alive or sprouting in the gap; although the details of their management have not been provided. No evidence of discing was observed. The 2018 Draft BRE described all willows within the Project Area were assumed to be reliant on the intermittent stream

and, therefore, riparian; however, it could also be the case that the willows farther from the intermittent stream were not dependent on the stream and were upland, similar to current mapping in this report. Ultimately, this report cannot determine the cause (natural or human) of the change in distribution of willows in the Project Area, only document the changes in acreage and current conditions.

Special-status Species

SPECIAL-STATUS PLANTS

The 2018 Draft BRE found that the Study Area had moderate potential to support eight (8) special status plant species, including: coastal marsh milk-vetch (*Astragalus pycnostachyus* var. *pycnostachyus*), johnny-nip (*Castilleja ambigua* var. *ambigua*), San Francisco Bay spineflower (*Chorizanthe cuspidata* var. *cuspidata*), San Francisco gumplant (*Grindelia hirsutula* var. *maritima*), perennial goldfields (*Lasthenia californica* ssp. *macrantha*), Choris' popcorn flower (*Plagiobothrys chorsianus* var. *chorsianus*), Oregon polemonium (*Polemonium carneum*), and San Francisco champion (*Silene verecunda* ssp. *verecunda*). However, the Project Area did not contain suitable habitat for any of the eight special-status plant species, and these species were only determined to have potential to occur in coyote brush scrub habitat over 100 feet from the Project Area. WRA concurs with the finding that no special-status plant species have moderate or high potential to occur within the Project Area.

SPECIAL-STATUS WILDLIFE

WRA concurs with the findings from the 2018 Draft BRE that the Study Area has moderate potential to support eight (8) special status wildlife species (western red bat, hoary bat, San Francisco dusky-footed woodrat, white-tailed kite, Allen's hummingbird, San Francisco (saltmarsh) common yellowthroat, Bryant's savannah sparrow, and loggerhead shrike. However, the Project Area only has potential to support seven (7) of these species, as there is no grassland habitat within the Project Area to support Bryant's savannah sparrow. Additionally, the Study and Project Areas have potential to support common nesting birds protected by the CFGC. Although there is potential, no San Francisco dusky-footed woodrat houses were observed within the Project Area in 2018 or in 2023.

Recommendations

Based on review of the previously submitted report and the September 19, 2023, site visit, WRA concludes that conditions within the Study Area have changed since the 2018 Draft BRE, but the report adequately assessed the impacts and appropriate mitigations for development of the Project Area. In addition, the biological community does not contain central coast riparian scrub as shown in the LCLUP over the entirety of the parcel and a portion of a neighboring parcel to the north. One biological community, arroyo willow thicket riparian, present in the Study Area has been diminished since 2018 due to natural mortality and plant removal because of poor health¹¹,¹², and this change is reflected in the updated biological communities map included in Attachment A, Figures 1 and 2. CalFire weed abatement activities have also occurred since 2018, although those activities are believed to be restricted to herbaceous vegetation control. The Project Area is within a 35-foot riparian buffer for the arroyo willow thicket riparian community and a 20-foot stream buffer for the intermittent stream (Attachment A, Figures 1 and 2). No special-status plant species have moderate or high potential to be present in the Project Area. Several special-status wildlife species described in the 2018 Draft BRE have potential to be present in the Project Area.



Recommendations following current guidelines for sensitive communities and special-status wildlife are provided below.

Sensitive Biological Communities

Intermittent Stream

Avoidance of jurisdictional features is recommended to the extent possible, and no impacts or work adjacent to the intermittent stream are proposed. No additional measures beyond the LCLUP standards in non-riparian watercourse buffers (Policy 6-53 and 6-55) are recommended for the intermittent stream.

Riparian Habitat

Within the Project Area, 0.02 acre of riparian habitat (arroyo willow thicket riparian) is present. The proposed development footprint is outside of the riparian habitat but within the Riparian Corridor Buffer as described in the LCLUP. A reduced setback may be requested where the only building site is within a buffer; however, the proposed development would still be within the LCLUP reduced buffer of 20-foot. The City will have to make a determination on conformance of the proposed Project with the LCLUP and City Municipal Code based on this consideration. If development is allowed, WRA recommends the following measure in addition to LCLUP standards for work in riparian buffers (Policy 6-48 and 6-52):

- Prior to ground disturbance, flag the edge of riparian habitat adjacent to construction activities with orange construction fence and signage to alert workers of sensitive habitats to be avoided.

Riparian habitat is potentially subject to the jurisdiction of the RWQCB, the CDFW, the CCC, and the City LCLUP. Riparian habitat is considered to be impacted if project activities remove or kill riparian trees. If riparian habitat is impacted by project activities, the following permits may be required prior to project commencement:

- RWQCB Section 401 Water Quality Certification
- CDFW Section 1602 Lake or Streambed Alteration Agreement

Habitat mitigation may also be required for impacts to riparian habitat by the City under the LCLUP. The LCLUP provides a recommended mitigation ratio of 3:1 for riparian habitat (Policy 6-70), and a mitigation, monitoring, and reporting plan to monitor and document the success of the mitigation. Based on existing conditions, the proposed development should avoid riparian habitat; however, riparian habitat has decreased since the 2018 Draft BRE and previously the development would have resulted in removal of riparian habitat. The reduction in riparian habitat since 2018 may have been a result of natural processes based on arborist reports (Maguire Tree Care 2022 and 2023) and lack of regrowth documented; however, whether it was natural causes or from vegetation management, it cannot be determined by this report. The City will need to review the available documentation including previously submitted arborist reports to determine if the reduction in riparian habitat requires mitigation.



Special-status Species

SPECIAL-STATUS PLANTS

No impacts to the special-status plant species that have potential to occur in the Study Area is anticipated from the proposed Project. Consequently, avoidance or minimization of impacts to special-status plant species within the Project Area is not warranted.

SPECIAL-STATUS WILDLIFE

The Project Area has moderate potential to support seven (7) special status wildlife species: western red bat, hoary bat, San Francisco dusky-footed woodrat, white-tailed kite, Allen's hummingbird, San Francisco (saltmarsh) common yellowthroat, and loggerhead shrike. Additionally, the Study and Project Areas have potential to support common nesting birds protected by the MBTA and CFGC.

Special-status and common roosting bats

Two special-status bat species, western red bat and hoary bat, may utilize trees within Project Area for non-maternity roosting during the non-hibernation season. If tree removal or trimming is to occur, special-status and/or common roosting bats may be impacted during tree removal activities by causing injury to or the death of individuals. If the proposed Project plans include tree removal, felled trees must lay undisturbed overnight before further tree moving (i.e., hauling offsite, chipping, etc.) can proceed.

Special-status birds, raptors, and common nesting birds

Potential impacts to special-status birds, common nesting birds, and their habitats could occur during the removal of vegetation or during ground-disturbing activities. These activities could result in the direct removal or destruction of active nests or may create audible, vibratory, and/or visual disturbances that cause birds to abandon active nests. It is recommended that any trees and shrubs in or adjacent to the Project Area that are proposed for removal and could be used as avian nesting sites be removed during the non-nesting season (September 1 through February 14).

If Project activities are initiated during the nesting season (February 15 – August 31), a pre-construction nesting bird survey shall be conducted by a qualified biologist within 14 days prior to ground disturbance. These surveys shall determine the presence or absence of active nests that may be affected by Project activities.

- If active nests of protected species are found within Project impact areas or close enough to these areas to affect nesting success, a work exclusion zone shall be established around each nest by a qualified biologist. Established exclusion zones shall remain in place until all young in the nest have fledged or the nest otherwise becomes inactive. Appropriate exclusion zone sizes vary dependent upon bird species, nest location, existing visual buffers, ambient sound levels, and other factors; an exclusion zone radius may be as small as 25 feet (for common, disturbance-adapted species) or as large as 250 feet or more for raptors. Exclusion zone size may also be reduced from established levels if supported with nest monitoring by a qualified biologist indicating that work activities are not adversely impacting the nest.



San Francisco Dusky Footed Woodrat

San Francisco dusky-footed woodrat has potential to occur in the arroyo willow thicket riparian habitat in the Project Area. Potential impacts to San Francisco dusky-footed woodrats may occur during vegetation removal, excavation, general ground disturbing activities, or the removal of stick houses. These activities may potentially cause injury to or the death of San Francisco dusky-footed woodrat individuals. If Project activities are to occur in the arroyo willow thicket riparian habitat, the Project Area should be surveyed for the presence of nest structures by a qualified biologist. If nest structures are observed and cannot be avoided, a qualified biologist should remove the structures by hand before ground disturbance occurs. If juveniles are found during hand removal, the nest should be reassembled and left for three weeks before attempting to remove the nest.

Please feel free to contact me if you have any questions regarding the findings of this Biological Resource Evaluation Conditions Update.

Sincerely,

Patricia Valcarcel

Regulatory Program Director

Attachments:

Attachment A: Figures

Figure 1: Biological Communities Within the Study Area

Figure 2: Biological Communities, Focused on the Project Area

Attachment B: Observed Species List

Attachment C: Site Photographs

Attachment D: Wetland Delineation Data Sheets



Attachment A

Figures





Figure 1. Biological Communities Within the Study Area

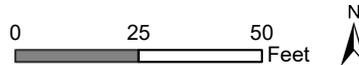
Path: L:\Acad 2000 Files\190000\19052-4\GIS\ArcMap\19052-4Base.aprx Layout Name: Fig2_Biological Communities Focused on the Project Area



Sources: San Mateo County Imagery 2022, WRA | Prepared By: gillespie, 1/30/2026

Figure 2. Biological Communities, Focused on the Project Area

2806 Alameda Avenue
Half Moon Bay, California



Attachment B
Observed Species List



Attachment B-1. Plant Species Observed within the Study Area on September 19, 2023

Scientific Name	Common Name	Origin	Form	Rarity Status ¹	CAL-IPC Status ²	Wetland Status ³
<i>Anthemis cotula</i>	Dog fennel	non-native	annual herb	-	-	FACU
<i>Avena sp.</i>	Wild oats	non-native	annual grass	-	-	-
<i>Baccharis pilularis</i>	Coyote brush	native	shrub	-	-	-
<i>Bromus diandrus</i>	Ripgut brome	non-native (invasive)	annual grass	-	Moderate	-
<i>Bromus hordeaceus</i>	Soft chess	non-native (invasive)	annual grass	-	Limited	FACU
<i>Cirsium vulgare</i>	Bullthistle	non-native (invasive)	perennial herb	-	Moderate	FACU
<i>Conium maculatum</i>	Poison hemlock	non-native (invasive)	perennial herb	-	Moderate	FACW
<i>Cyperus eragrostis</i>	Tall cyperus	native	perennial grasslike herb	-	-	FACW
<i>Daucus carota</i>	Carrot	non-native	perennial herb	-	-	UPL
<i>Delairea odorata</i>	Cape ivy	non-native (invasive)	perennial herb	-	High	FAC
<i>Ehrharta erecta</i>	Upright veldt grass	non-native (invasive)	perennial grass	-	Moderate	-
<i>Epilobium brachycarpum</i>	Panicled willow herb	native	annual herb	-	-	FAC
<i>Epilobium ciliatum</i>	Slender willow herb	native	perennial herb	-	-	FACW
<i>Erigeron canadensis</i>	Horseweed	native	annual herb	-	-	FACU
<i>Festuca perennis</i>	Italian rye grass	non-native (invasive)	annual, perennial grass	-	Moderate	FAC
<i>Helminthotheca echioides</i>	Bristly ox-tongue	non-native (invasive)	annual, perennial herb	-	Limited	FAC
<i>Hirschfeldia incana</i>	Short-podded mustard	non-native (invasive)	perennial herb	-	Moderate	-
<i>Kickxia elatine</i>	Sharp point fluellin	non-native	perennial herb	-	-	UPL
<i>Lysimachia arvensis</i>	Scarlet pimpernel	non-native	annual herb	-	-	FAC
<i>Lythrum hyssopifolia</i>	Hyssop loosestrife	non-native (invasive)	annual, perennial herb	-	Limited	OBL
<i>Madia sativa</i>	Coastal tarweed	native	annual herb	-	-	-

Scientific Name	Common Name	Origin	Form	Rarity Status ¹	CAL-IPC Status ²	Wetland Status ³
<i>Plantago coronopus</i>	Cut leaf plantain	non-native	annual herb	-	-	FAC
<i>Polypogon monspeliensis</i>	Annual beard grass	non-native (invasive)	annual grass	-	Limited	FACW
<i>Pseudognaphalium luteoalbum</i>	Jersey cudweed	non-native	annual herb	-	-	FAC
<i>Raphanus sativus</i>	Wild radish	non-native (invasive)	annual, biennial herb	-	Limited	-
<i>Rubus ursinus</i>	California blackberry	native	vine, shrub	-	-	FAC
<i>Rumex crispus</i>	Curly dock	non-native (invasive)	perennial herb	-	Limited	FAC
<i>Salix lasiolepis</i>	Arroyo willow	native	tree, shrub	-	-	FACW
<i>Solanum nigrum</i>	Black nightshade	non-native	annual herb	-	-	FACU
<i>Sonchus oleraceus</i>	Common sow thistle	non-native	annual herb	-	-	UPL
<i>Spergularia rubra</i>	Purple sand spurry	non-native	annual, perennial herb	-	-	FAC
<i>Urtica dioica</i>	Stinging nettle	native	perennial herb	-	-	FAC
<i>Zantedeschia aethiopica</i>	Callalily	non-native (invasive)	perennial herb	-	Limited	OBL

Note: All species identified using the *Jepson eFlora* [Jepson Flora Project (eds.) 2023]; nomenclature follows *Jepson eFlora* [Jepson Flora Project (eds.) 2023] or Rare Plant Inventory (CNPS 2023). Sp.: “species”, intended to indicate that the observer was confident in the identity of the genus but uncertain which species.

*Special-status only at native occurrences. The Project Area does not contain a native occurrence of this species.

¹ California Native Plant Society. 2023. *Rare Plant Inventory* (online edition, v9.5). Sacramento, California. Online at: <http://rareplants.cnps.org/>; most recently accessed: September 2023.

FE:	Federal Endangered
FT:	Federal Threatened
SE:	State Endangered
ST:	State Threatened
SR:	State Rare
Rank 1A:	Plants presumed extinct in California
Rank 1B:	Plants rare, threatened, or endangered in California and elsewhere
Rank 2:	Plants rare, threatened, or endangered in California, but more common elsewhere
Rank 3:	Plants about which we need more information – a review list
Rank 4:	Plants of limited distribution – a watch list

² California Invasive Plant Council. 2023. *California Invasive Plant Inventory Database*. California Invasive Plant Council, Berkeley, CA. Online at: <http://www.cal-ipc.org/paf/>; most recently accessed: September 2023.

High: Severe ecological impacts; high rates of dispersal and establishment; most are widely distributed ecologically.
Moderate: Substantial and apparent ecological impacts; moderate-high rates of dispersal, establishment dependent on disturbance; limited-moderate distribution ecologically
Limited: Minor or not well documented ecological impacts; low-moderate rate of invasiveness; limited distribution ecologically
Assessed: Assessed by Cal-IPC and determined to not be an existing current threat

³ U.S. Army Corps of Engineers. 2020. National Wetland Plant List, version 3.5. Engineer Research and Development Center. Cold Regions Research and Engineering Laboratory, Hanover, NH. Online at: <http://wetland-plants.usace.army.mil/>

OBL: Almost always found in wetlands
FACW: Usually found in wetlands
FAC: Equally found in wetlands and uplands
FACU: Usually not found in wetlands
UPL: Almost never found in wetlands
NL: Not listed, assumed almost never found in wetlands
NI: No information; not factored during wetland delineation

Attachment B-2. Wildlife Species Observed within the Study Area on September 19, 2023

Scientific Name	Common Name
<i>Spinus psaltria</i>	Lesser goldfinch
<i>Haemorhous mexicanus</i>	House finch
<i>Calypte anna</i>	Anna's hummingbird
<i>Melospiza melodia</i>	Song sparrow
<i>Zonotrichia leucophrys</i>	White-crowned sparrow
<i>Melospiza crissalis</i>	California towhee
<i>Buteo jamaicensis</i>	Red-tailed hawk (flyover)
<i>Sitta carolinensis</i>	White-breasted nuthatch
<i>Sayornis nigricans</i>	Black phoebe
<i>Thomomys bottae</i>	Botta's pocket gopher
<i>Vanessa atalanta</i>	Red admiral butterfly

Attachment C
Representative Photos





Photo 1: Ruderal and arroyo willow thicket riparian (upper left) and arroyo willow thickets non-riparian (upper right) biological communities within the Project Area, facing southwest.



Photo 2: Coyote brush scrub (center and background) and ruderal (foreground) biological communities located in the southwestern portion of the Study Area, facing west.



Photo 3: Arroyo willow thicket riparian biological community adjacent to Pullman Watercourse, facing northeast.



Photo 4: Culvert inlet of the Pullman Watercourse at the southwestern corner of the Project Area.

Attachment D

Wetland Delineation Data Forms



WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 2806 Alameda Ave City/County: Half Moon Bay/San Mateo Sampling Date: 9/9/2023
 Applicant/Owner: City of Half Moon Bay State: CA Sampling Point: P02
 Investigator(s): Scott Batiuk and Maya Avendano, WRA inc. Section, Township, Range: N/A
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): none Slope (%): 0
 Subregion (LRR): LRR C (Medit. CA) Lat: 37.48857336 Long: -122.4529772 Datum: WGS 84
 Soil Map Unit Name: NOTCOM NWI classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: Sample point is located within the central portion of the parcel. Hydrophytic vegetation is present at the sample point, though the bare ground is also present at a level of 45%. Neither hydric soil indicators nor wetland hydrology indicators were observed at the sample point. Given the co-dominance of an upland species, along with no hydric soil or wetland hydrology indicators, the sample point is not located within a CCC or Corps wetland.	

VEGETATION – Use scientific names of plants.

<u>Tree Stratum</u> (Plot size: <u>25' fence line</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. <u>Salix lasiolepis</u>	<u>10</u>	<u>Y</u>	<u>FACW</u>	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>66%</u> (A/B)
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
	<u>10</u>	= Total Cover		
<u>Sapling/Shrub Stratum</u> (Plot size: <u>N/A</u>)				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>6</u> x 1 = <u>6</u> FACW species <u>10</u> x 2 = <u>20</u> FAC species <u>18</u> x 3 = <u>54</u> FACU species <u>6</u> x 4 = <u>24</u> UPL species <u>15</u> x 5 = <u>75</u> Column Totals: <u>55</u> (A) <u>179</u> (B) Prevalence Index = B/A = <u>3.25</u>
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
5. _____	_____	_____	_____	
	_____	= Total Cover		
<u>Herb Stratum</u> (Plot size: <u>5'x5'</u>)				Hydrophytic Vegetation Indicators: <input checked="" type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)
1. <u>Ehrharta erecta</u>	<u>13</u>	<u>Y</u>	<u>NL</u>	
2. <u>Helminthotheca echioides</u>	<u>11</u>	<u>Y</u>	<u>FAC</u>	
3. <u>Lysimachia arvensis</u>	<u>6</u>	<u>N</u>	<u>FAC</u>	
4. <u>Lythrum hyssopifolium</u>	<u>6</u>	<u>N</u>	<u>OBL</u>	
5. <u>Cirsium vulgare</u>	<u>4</u>	<u>N</u>	<u>FACU</u>	
6. <u>Erigeron canadensis</u>	<u>2</u>	<u>N</u>	<u>FACU</u>	
7. <u>Raphanus sativus</u>	<u>2</u>	<u>N</u>	<u>NL</u>	
8. <u>Rumex crispus</u>	<u>1</u>	<u>N</u>	<u>FAC</u>	
	<u>45</u>	= Total Cover		
<u>Woody Vine Stratum</u> (Plot size: <u>N/A</u>)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
	<u>55</u>	= Total Cover		
% Bare Ground in Herb Stratum <u>45</u> % Cover of Biotic Crust <u>0</u>				

Remarks:
 Vegetation at the sample point meets the Dominance Test criteria. Sample point is dominated by hydrophytic vegetation.

WETLAND DETERMINATION DATA FORM – Arid West Region

Project/Site: 2806 Alameda Ave City/County: Half Moon Bay/San Mateo Sampling Date: 9/19/2023
 Applicant/Owner: City of Half Moon Bay State: CA Sampling Point: P03
 Investigator(s): Scott Batiuk and Maya Avendano, WRA inc. Section, Township, Range: N/A
 Landform (hillslope, terrace, etc.): terrace Local relief (concave, convex, none): none Slope (%): 0
 Subregion (LRR): LRR C (Medit. CA) Lat: 37.48857336 Long: -122.4529772 Datum: WGS 84
 Soil Map Unit Name: NOTCOM NWI classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: Sample point was located on a mounded portion of the parcel. The sample point was not dominated by hydrophytic vegetation and did not show evidence of hydric soils or wetland hydrology indicators. Sample point is not located within a wetland.	

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: <u>N/A</u>)	Absolute % Cover	Dominant Species?	Indicator Status	
1. _____	_____	_____	_____	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A) Total Number of Dominant Species Across All Strata: <u>1</u> (B) Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0%</u> (A/B)
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
<u>0</u> = Total Cover				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species _____ x 1 = _____ FACW species _____ x 2 = _____ FAC species _____ x 3 = _____ FACU species _____ x 4 = _____ UPL species _____ x 5 = _____ Column Totals: _____ (A) _____ (B) Prevalence Index = B/A = _____
Sapling/Shrub Stratum (Plot size: <u>N/A</u>)				
1. _____	_____	_____	_____	
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
_____ = Total Cover				
Herb Stratum (Plot size: <u>5'x5'</u>)				
1. <u>Raphanus sativus</u>	<u>35</u>	<u>Y</u>	<u>NL</u>	Hydrophytic Vegetation Indicators: <input type="checkbox"/> Dominance Test is >50% <input type="checkbox"/> Prevalence Index is ≤3.0 ¹ <input type="checkbox"/> Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/> Problematic Hydrophytic Vegetation ¹ (Explain)
2. <u>Conium maculatum</u>	<u>10</u>	<u>N</u>	<u>FACW</u>	
3. <u>Helminthotheca echioides</u>	<u>5</u>	<u>N</u>	<u>FAC</u>	
4. <u>Lysimachia arvensis</u>	<u>2</u>	<u>N</u>	<u>FAC</u>	
5. <u>Solanum nigrum</u>	<u>1</u>	<u>N</u>	<u>FACU</u>	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
8. _____	_____	_____	_____	
<u>53</u> = Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	_____	_____	¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. _____	_____	_____	_____	
<u>53</u> = Total Cover				
% Bare Ground in Herb Stratum <u>47</u>		% Cover of Biotic Crust _____		Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Remarks:
 Vegetation primarily occurred on the top of the mound. Hydrophytic vegetation criterial not met.

SOIL

Sampling Point: P03

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-8	10YR 2/2	100					CL	
8-12	10YR 3/2	100					SL	